



South Cambridgeshire Local Development Framework

**Development Affecting Conservation Areas  
Open Space in New Development  
Public Art  
Trees & Development Sites**

Supplementary Planning Documents

**Statement of Consultation**

**January 2009**

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## **1. INTRODUCTION**

- 1.1 This statement has been developed to provide information relating to how the representations received to the following Supplementary Plan Documents (SPD) have been considered in accordance with Town & Country Planning (Local Development) (England) Regulations 2004 - Regulation 18(4):
  - Development Affecting Conservation Areas
  - Open Space In New Developments
  - Public Art
  - Trees & Development Sites
- 1.2 The SPDs have also been subject to Sustainability Appraisal. The Sustainability Appraisal and Strategic Environmental Assessment (SA / SEA) has been undertaken in parallel with the preparation of the SPDs, so that sustainability considerations have been identified at an early stage and reflected in their content.
- 1.3 A Sustainability Appraisal Scoping Report Addendum has been prepared for the Conservation Areas, Open Space and Public Art SPDs, and subject to consultation with statutory bodies (English Heritage, Environment Agency and Natural England. Sport England and Play England were also consulted on the Open Space Addendum). These Addendums form part of the South Cambridgeshire Sustainability Appraisal Scoping Report (January 2006), and provide a framework for the Sustainability Appraisals. A Scoping Report Addendum was not produced for the Trees SPD as it was felt the existing Sustainability Appraisal Scoping Report was sufficiently detailed to cover it; the statutory bodies did not disagree with this approach.
- 1.4 The preparation of the SPDs has been subject to public participation in accordance with Regulation 17.
- 1.5 This statement sets out the following information for the public consultation:
  - A summary of the main issues raised in representations received during the public consultation; and
  - How these issues have been addressed in the SPDs.

## **2. CONSULTATION OVERVIEW**

- 2.1 A six-week period of public consultation on the SPDs and their associated Sustainability Appraisals took place between 6 June and 18 July 2008. The Council set up an interactive website to assist access to the documents and to facilitate making responses online.

2.2 A total of 193 representations were received on the SPDs. No representations were received to the Sustainability Appraisals. The breakdown of these representations is shown in the table below.

**Breakdown of representations received to the SPDs:**

SPD	Support	Object	Total
Development Affecting Conservation Areas	7	25	32
Open Space In New Developments	9	59	68
Public Art	11	43	54
Trees & Development Sites	5	34	39

**Summary of the main issues raised to the Development Affecting Conservation Areas SPD:**

- The legislative background is due to change when the Heritage Protection Bill is enacted and it is suggested this should be recognised within the SPD.
- Concern that the SPD is too focused on what is happening within Conservation Areas and does not address the setting of Conservation Areas adequately.
- Comment that there is no reference under what circumstances the Council would consider the use of an Article 4 Direction nor when it would consider withdrawing Permitted Development Rights.
- Concern that the SPD is too restrictive over the use of recycled materials and it is suggested the SPD be amended so as to provide maximum flexibility in the use of recycled materials in all situations.

**Summary of the main issues raised to the Open Space in New Developments SPD:**

- Concern that there are parts of the SPD which appear to be seeking to create new policy rather than providing greater detail on the policies in adopted Development Plan Documents.
- Concern that the full hierarchy of green infrastructure has not been considered in the Draft SPD, with Strategic Open Space not included.
- Suggestion that greater clarity about the application of the Open Space SPD to Area Action Plans should be provided.
- Concern over the insistence on 50% of equipped play space and there being no justification in national policy guidelines.

- Concern that non-residential developments are required to contribute towards outdoor playing space, as there is no such reference in Policy SF/10.
- Concern over the use of Cambourne as the model for occupancy rates and sports participation rates, as Cambourne is considered unrepresentative of overall patterns of supply and demand throughout the District.
- Concern over the period of maintenance contributions, calculations used, and consistency with Circular 05/2005.
- Various concerns over the areas included in list of areas and facilities that do not contribute towards Open Space Standards.

**Summary of the main issues raised to the Public Art SPD:**

- Concern that the definition of Public Art and criteria of what does / does not constitute Public Art is too narrow and restrains creativity. The criteria exclude architectural detail which is of concern.
- Questioned the need for a professional artist to be involved – could have non-professional or other members of the design team with artistic skills to create Public Art.
- Concern was expressed that developers were to be expected to allocate between 1% and 5% of the construction costs of a capital project to Public Art.
- Concern that Public Art in new developments should be based on themes. This is seen as too prescriptive.
- The Public Art Support Group was welcomed and requests were made for it to have a wide membership and its terms of reference be consulted on.
- Clarification needed of some aspects of the Development Flow Chart.

**Summary of the main issues raised to the Trees & Development Sites SPD:**

- Suggestion that the SPD should recognise that there are different types of planning applications that require different levels of detail.
- Concern that there is no specific mention of older trees, which are particularly valuable and should be conserved and their loss avoided.

- The Forestry Commission note that while the SPD appears to be accurate and consistent with the Planning Authority's responsibilities, they are concerned there are important omissions with regard to their statutory responsibilities.
- Suggestion that there should be reference to the repercussions if trees are wilfully damaged or destroyed.
- Concern that the section on New Planting does not make reference to including trees of different sizes, those that are best suited to different sites, as many new developments only plant small ornamental trees.

**How these issues have been addressed:**

- 2.3 The following schedules for each SPD provide a summary all of the representations received in plan order together with any suggested change to the text of the SPD, the Council's assessment of them and, where appropriate, proposes amendments to the text of the draft SPDs.
- 2.4 There are no amendments proposed to the Sustainability Appraisals, as the changes to the SPDs are relatively minor, in the main providing further detail or clarification rather than altering the policy approach.
- 2.5 The proposed changes to the SPDs and their impact on sustainability have been considered by the Council at a meeting of Cabinet on 15 January 2009 as part of the process of formally adopting the revised SPDs.

# ***Development Affecting Conservation Areas Supplementary Planning Document***

## ***Public Participation Report***

Chapter 1- Introduction

1.1

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b><i>Chapter 1- Introduction</i></b>					
<b>1.1</b>					
22149 - Cambridgeshire County Council	Support	No specific comments, in general support.		Support noted.	No change.
22177 - Great Shelford Parish Council	Support	Another useful document.		Support Noted.	No change.
22219 - East of England Regional Assembly	Support	The Regional Planning Panel Standing Committee considered the attached report at the meeting of 27th June 2008 and endorsed the recommendation that: 'The four draft Supplementary Planning Documents prepared by South Cambridgeshire District Council are in general conformity with the RSS.'		Noted.	No change.
22097 - Steeple Morden Parish Council	Support	Steeple Morden Parish Council supports the general thrust of the Conservation Area SPD.		Support noted.	No change.
<b>1.2</b>					
22195 - Cambridge Preservation Society	Object	Object to omission - impact of developments adjacent to a Conservation Areas should be also discussed in detail to ensure the Conservation Areas are not affected to their detriment.		Paragraph 4.14 of Planning Policy Guidance note 15 makes reference to the desirability of preserving or enhancing the Conservation Area should also be a material consideration when handling development proposals outside the Conservation Area but would affect its setting, or views into or out of the area. Policy CH/5 refers to development proposals in or affecting Conservation Areas. Therefore, the same principals apply to developments that will affect the setting of a Conservation Area as to those within. Whilst this alluded to in paragraphs 1.2, 1.5, 1.7 and 1.8, agree it should be given more emphasis in the SPD.	Add a new paragraph after paragraph 1.9 to read: "Development affecting Conservation Areas includes any development proposal outside the Conservation Area that would affect its setting, or views into or out of the area. The guidance contained in this SPD should be applied equally to any such development proposals." Renumber the remaining paragraphs accordingly.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>1.3</b>					
22056 - English Heritage	Object	You will be aware that the legislative background is about to change with the Heritage Protection Bill currently before parliament. It would be appropriate to make a brief reference to this in the introduction though, as changes are some way off, further detail would be premature at this stage. It may also be appropriate to note that the document will need to be revised as necessary when PPGs 15 and 16 are updated to support the new Heritage Protection legislation.		Agree that reference should be made to the draft Heritage Protection Bill.	Add the following to the end of paragraph 1.3: "The draft Heritage Protection Bill is likely to introduce changes to the way the historic environment is protected in England when it is implemented. As a consequence, it may result in a review of Planning Policy Guidance note 15 to support the new Heritage Protection legislation, at which time this SPD will need to be updated."
<b>1.4</b>					
22044	Object	Although I have no detailed comments on the Draft SPD, I continue to consider that the recent expansion of the boundaries of the St Michael's Conservation Area at Longstanton was unjustified and has diluted and devalued the importance of the Conservation Area itself, the original boundaries of which were more tightly drawn around St Michael's church.	The Draft SPD should be amended to commit and make reference to an early review of the Longstanton St Michael's Conservation Area boundaries.	The Longstanton Conservation Area was reviewed recently and an extension to its boundaries in the vicinity of Long Lane was formally designated on 22 September 2005. Conservation Areas are designated under separate legislation and their boundaries cannot be changed through the plan making process. The Development Control Policies Development Plan Document (DPD) sets out policies that apply to the Conservation Area, and it is shown on the Proposals Map for information, but cannot change the boundary. The SPD provides further guidance on the DPD policies that apply to Conservation Areas and is not the mechanism for reviewing Conservation Area boundaries.	No change.
<b>1.6</b>					
22077 - Natural England	Support	Natural England supports the aims of this SPD in protecting Conservation Areas from development.		Support noted.	No change.

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<b>1.8</b>					
22045 - The National Trust	Object	Given the statement in the Draft Heritage Protection Bill, currently being considered, that the Government intends to reverse the outcome of the 1992 High Court case (South Lakeland DC v Sec of State for the Env), either this fact should be recorded in para. 1.8 or reference to the High Court case excluded from the SPD. The Draft Bill has stated that the eventual Bill will provide that a proposed change that does not benefit the conservation area will not be considered to be appropriate.		The draft Heritage Protection Bill is still in its infancy and there are still a number of steps to be taken before its implementation, which is not anticipated until 2010/11. During this process there may be revisions to the Bill, therefore it is not yet known what the final Bill will say. Until the Bill is implemented the wording in Planning Policy Guidance note 15 remains relevant. It is proposed to add text to paragraph 1.3 to refer to the Heritage Protection Bill (in response to Representation number 22056), but it is premature to add anything further at this stage.	No change.
<b>1.9</b>				Agree.	Amend the note at the end of paragraph 1.9 to read: "The issue of trees in Conservation Areas is the subject of the Trees and Development Sites SPD."
22089 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher suggest that the note to Paragraph 1.9 is revised to confirm that the 'separate' SPD is the 'Trees and Development Sites SPD' so as to avoid any confusion as to the documents being referenced.			
<b>1.10</b>					
22090 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 1.10 makes reference to 'the separate SPD on works to Listed Buildings'. To the best of our knowledge this document is not yet available and therefore it is not possible to determine whether the policies in that document are appropriate. Furthermore, it is not possible to carry out a comprehensive assessment as the implications of policy in another (as yet unpublished document) cannot be determined. Furthermore, English Partnerships and Gallagher wish to reserve the right to revisit comments on this document when the Listed Buildings SPD is published to ensure that complementary documents are adopted.	As such the document should be revised to make reference to 'emerging' SPD as this more accurately reflects the position.	Supplementary Planning Documents cannot introduce new policy, rather they elaborate upon policies in the adopted Development Plan Documents.  There is no need to amend the reference to the Listed Buildings SPD within the text of the SPD to indicate that it is "emerging". The SPDs are listed in Appendix 2 together with their status.	Ensure the status of the SPDs listed in Appendix 2 reflects the latest position.

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<b>1.11</b>					
22046 - The National Trust	Object	The Draft Heritage Protection Bill is proposing to strengthen the importance of protecting the setting of heritage assets such as conservation areas and historic parks and gardens and this needs to be reflected in the SPD.	The words "or adjacent to" in lines 6 and 7 should be replaced with "or within the setting of".	Agree with the sentiments of this representation. However, the draft Heritage Protection Bill is still in its infancy and there are still a number of steps to be taken before its implementation, which is not anticipated until 2010/11. During this process there may be revisions to the Bill, therefore it is not yet known what the final Bill will say. Until the Bill is implemented the wording in PPG15 remains relevant. Paragraph 4.14 of Planning Policy Guidance Note refers to the desirability of preserving or enhancing the area should also be a material consideration when handling development proposals outside the Conservation Area but would affect its setting, or views into or out of the area. As a result, it would be appropriate to replace "or adjacent to" with "or affecting".	Amend the last sentence of paragraph 1.11 to read: "Any planning application within or affecting a Conservation Area will be considered against the key characteristics identified within the appraisal and the policies outlined in the management plan."
22099 - Steeple Morden Parish Council	Object	Should make clear that any planning application which impacts upon the character and setting of a Conservation Area will be considered against the key characteristics identified within the appraisal not just those that are within or adjacent. Some applications due to their scale and position could impact upon a Conservation Area though physically they might be some distance from the boundary.		The second and third sentences of Paragraph 1.11 already state that where a character appraisal exists, planning applications within and adjacent to Conservation Areas will be considered against the key characteristics identified within them, and the policies outlined in the management plan. It is also proposed to introduce an additional paragraph after paragraph 1.9 (in response to Representation 22195) to clarify that it is not just development within Conservation Areas to which the policy applies, but also any development proposal that affects its setting, or views into or out of the area.	No further change.

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22098 - Steeple Morden Parish Council	Object	Those villages who are not in possession of the current Conservation Area appraisal will take precedence in the review because they are particularly vulnerable to challenge.		Paragraph 1.11 states that individual character appraisals and management plans will be prepared for all Conservation Areas in South Cambridgeshire, but acknowledges this may take some time to complete. It is expected that appraisals will be undertaken following the settlement hierarchy in the Core Strategy DPD, with those villages without appraisals but most likely to be affected by major developments in and around Cambridge being prioritised. It is not appropriate to refer to a more detailed timetable for the completion of appraisals within the SPD as this is a separate process.	No change.
22178 - Great Shelford Parish Council	Support	A draft Great Shelford Conservation policy document was produced in 2007. As far as we are aware this has not been adopted. Reading through the SPD it is clear that there are recommendations in there which are not covered in the Gt Shelford Conservation Area Draft Policy Statement. It would be useful to know if the latter document will be updated in the light of the SPD being approved.		The Great Shelford Conservation Area Appraisal was adopted on 12.9.07, and is available to view on the Council's website: <a href="http://www.scambs.gov.uk/Environment/Conservation/ConservationAreaAppraisals/gawstonShelford.htm">http://www.scambs.gov.uk/Environment/Conservation/ConservationAreaAppraisals/gawstonShelford.htm</a> . The Conservation Areas SPD sets out the broad approaches to development affecting Conservation Areas across the whole district and will be read in conjunction with any local character appraisal, which provides a more detailed context to the local area. Therefore there is no need for both documents to cover identical things as they correspond with each other.	No change.

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<b><i>Chapter 2 - New Developments in Conservation Areas</i></b>					
<b>2.1</b>					
22078 - Natural England	Object	Paragraphs 2.1 - 2.7 should cross-reference other relevant SPDs such as Biodiversity and Trees and Development Sites since these issues will also require due consideration in the application for infill development.		There is no reference to trees or biodiversity issues within these paragraphs. Referring to the Trees and / or Biodiversity SPDs would therefore be out of context and would create unnecessary repetition, as reference is already made to other SPDs in the Introduction. The SPDs are also listed in Appendix 2 as sources of further information.	No change.
<b>2.4</b>					
22193 - Cambridge Preservation Society	Object	Clearer definition required of "character appraisal" and its status as material or not consideration in the planning process.		Noted.	Add a footnote to paragraph 1.11 as follows: "Conservation Area Character Appraisals are produced by the Council covering various Conservation Areas within the district. The appraisals define the special character and evolve guidelines for development and enhancement schemes. For further information contact the Conservation and Design Team."
<b>2.9</b>					
22194 - Cambridge Preservation Society	Object	Spelling - "from" should read "form".		Noted.	Amend the first sentence of paragraph 2.9 to read: "The South Cambridgeshire Design Guide identifies that a number of villages have a strong linear form and in such villages backland development may weaken or erode this character."

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<b>2.17</b>					
22180 - Great Shelford Parish Council	Object	Enlarge on hard landscaping to cover permeability and possibly general advice on how frontages should be treated. Parking is a real problem - maybe some advice on how car parking can fit into a conservation area.		<p>Landscaping issues will be covered in further detail by the Landscape, Biodiversity and Trees SPDs. General advice on frontages is already covered within paragraph 2.17 which deals with appropriate materials and guidelines on boundary treatments, and earlier in the SPD in the section dealing with Scale, Massing and Detailing.</p> <p>It is recognised that car parking can be a problem within many Conservation Areas given that many buildings pre-date motor cars. However, where there is sufficient space, householders are able to use their Permitted Development Rights to put in hard surfacing to accommodate cars within their curtilage, and if this surface area is over 5 square meters the surface is required to be of porous materials. These will need to be of appropriate materials to be sympathetic to the Conservation Area. Where there is no space for off-street car parking vehicles will inevitably be parked on the street. If this becomes a safety concern the local highways authority may take appropriate action to ensure safe passage of vehicles.</p>	No change.
22091 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher believe that whilst high quality design is important, in the context of Conservation Areas reference should also be made to design which preserves or enhances the character or appearance of the area, consistent with PPG15.		<p>Agree that a high standard of design is important in Conservation Areas, as indeed it is anywhere, in accordance with Government guidance in Planning Policy Statement 1. However, the introduction to the SPD stresses the importance of preserving or enhancing the character or appearance of Conservation Areas, in particular the section that deals with South Cambridgeshire LDF Policy (paragraphs 1.7 to 1.12). Therefore, it is not necessary to repeat these overarching principles throughout the SPD, as this would be unnecessary repetition.</p>	No change.

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22092 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher object to the reference to 'the setting of a Conservation Area' in paragraph 2.17. Clarification is requested to confirm that this is a reference to the conservation area itself, rather than the area around a conservation area. It is noted that PPG15 makes no reference to 'setting' of a conservation area, although it does make reference to the setting of 'proposed new development' (paragraph 4.18).	A revision to the sentence is requested as follows: 'In order for new developments to preserve or enhance a Conservation Area it is ...'.	Agree the revised wording is more consistent with Planning Policy Guidance note 15.	Amend the first sentence of paragraph 2.17 to read: "In order for new developments to preserve or enhance a Conservation Area it is important that they are constructed of appropriate materials, i.e. materials drawn from the pallet of traditional materials found in the locality."
22093 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher also object to paragraph 2.17 in that it places an undue emphasis on 'traditional materials' and identifies that contemporary design will only be approved in exceptional circumstances.	Accordingly, it is recommended that the penultimate sentence of paragraph 2.17 be amended as follows: 'Proposed development within conservation areas based on a contemporary design approach and use of non-traditional materials, will be carefully assessed for any unacceptable adverse impact on the character or appearance of the conservation area.'	Paragraph 2.17, as worded, places emphasis on the use of traditional materials to preserve and enhance the character and appearance of Conservation Areas whilst allowing, in exceptional circumstances, high quality contemporary design. The suggested wording weakens this stance considerably, removing the need for high quality design and implying contemporary design will be permitted as the norm rather than the exception.	No change.
22179 - Great Shelford Parish Council	Object	No mention made of the need for an unadorned ridge on thatched building. We are still getting fussy ones here.		The issue of ridges on thatched buildings is too detailed an issue for the Conservation Areas SPD. It is already covered in the Council's Thatching Guidance and will also be addressed in the Listed Buildings SPD.	No change.

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
2.19				

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22100 - Steeple Morden Parish Council	Object	2.19/20 We do not accept the argument expressed that the use of recycled material could confuse the ability to read and understand the pattern of development. Where this is necessary a simple search through planning records or limited knowledge of building techniques will elicit the truth. The benefit to the environment of using recycled materials that are in keeping with the surroundings out weighs this consideration.		The last sentence of paragraph 2.19 recognises the wider sustainability agenda, and actually promotes the reuse of salvaged materials, where appropriate. However in order to add clarity to this matter the wording of paragraph 2.19 and 2.20 is to be amended. It is important to recognise that reclaimed materials are a finite resource and therefore there is a need to prioritise the use of them for historic buildings, particularly for works to Listed Buildings, then works affecting the setting of a Listed Building. There can also an issue concerning the quality of some reclaimed materials, which needs to be considered. It is also important to consider the local context in which the materials are to be used, and it is often better to be true to the era of development (by using new materials) than try to make a new building look older than it is, which can result in a building that is neither one thing or the other. This will be assessed on a case by case basis.	Delete paragraphs 2.19 and 2.20 and replace with the following text: "2.19 Over recent years there has been an increasing move to use recycled building materials, and in particular bricks, slates and roofing tiles. The decision whether to use salvaged or new (but often traditional) materials needs to weigh the particular circumstances of each case against the factors set out below. 2.20 Reusing resources helps achieve sustainability objectives. When repairs are being carried out on a historic building it is important that materials are carefully removed, stored, and reused. When whole or parts of buildings are demolished, materials can be used successfully for new structures on the same site. Salvaged materials are particularly valuable in making repairs to historic buildings that match the existing and this use should be given priority. 2.21 It is also important not to encourage the sort of markets in salvaged materials that lead to the needless and damaging stripping or demolition of historic buildings. Materials should only be reused if they are of good quality and fit for purpose and are appropriate to a building's construction, type and location. 2.22 The changes made to historic buildings over time are usually reflected in their materials and details. Using new materials, as opposed to salvaged ones, means that this tradition is continued as recent additions can be clearly read. New materials can also be appropriate where a new building is responding to the general character of an area's buildings rather than trying to copy them. The use of new but traditional materials such as tiles,

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
				brick and stone helps promote their production and availability." Renumber the remaining paragraphs accordingly.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22032 - Solopark Plc	Object	Solopark objects to the Council's bias against the use of recycled materials in historic environments and believes that quality of materials (whether new or recycled), and quality of detailing and workmanship are more important considerations. The use of recycled materials is also more sustainable than the use of newly procured materials, and it should be a key objective of the Council to secure their use. This part of the SPD is based on whimsical philosophical arguments which are opposed.	The SPD should be amended so as to provide maximum flexibility in the use of recycled materials in all situations. The Council is free to express a preference and to negotiate according to that preference, but should not insist on new materials for philosophical reasons. Paragraphs 2.19 and 2.20 need to be adjusted with this in mind.	Conservation Areas and Listed Buildings are recognised for their special architectural or historic interest and it is appropriate to specify what the Council considers as appropriate materials. Paragraphs 2.19 and 2.20 recognise there is a role for recycled materials and provides flexibility for their use in appropriate circumstances. However in order to provide greater clarity in this matter paragraphs 2.19-2.20 have been amended . It is important to recognise that reclaimed materials are a finite resource and therefore there is a need to prioritise the use of them for historic buildings, particularly for works to Listed Buildings, then works affecting the setting of a Listed Building. There can also be an issue concerning the quality of some reclaimed materials, which needs to be considered. It is also important to consider the local context in which the materials are to be used, and it is often better to be true to the era of development (by using new materials) than try to make a new building look older than it is, which can result in a building that is neither one thing or the other. Although the Council has expressed a preference for the use of new materials for all significant new developments affecting the setting of Listed Buildings, the use of recycled materials can be negotiated on a case-by-case basis, and in some circumstances it may be appropriate to substitute recycled materials instead.	Delete paragraphs 2.19 and 2.20 and replace with the following text: "2.19 Over recent years there has been an increasing move to use recycled building materials, and in particular bricks, slates and roofing tiles. The decision whether to use salvaged or new (but often traditional) materials needs to weigh the particular circumstances of each case against the factors set out below. 2.20 Reusing resources helps achieve sustainability objectives. When repairs are being carried out on a historic building it is important that materials are carefully removed, stored, and reused. When whole or parts of buildings are demolished, materials can be used successfully for new structures on the same site. Salvaged materials are particularly valuable in making repairs to historic buildings that match the existing and this use should be given priority. 2.21 It is also important not to encourage the sort of markets in salvaged materials that lead to the needless and damaging stripping or demolition of historic buildings. Materials should only be reused if they are of good quality and fit for purpose and are appropriate to a building's construction, type and location. 2.22 The changes made to historic buildings over time are usually reflected in their materials and details. Using new materials, as opposed to salvaged ones, means that this tradition is continued as recent additions can be clearly read. New materials can also be appropriate where a new building is responding to the general character of an area's buildings rather than trying to copy them. The use of new but traditional materials such as tiles,

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<b>2.20</b>					
22094 - English Partnerships and Gallagher Longstanton Limited	Object	<p>It is understood that a separate SPD is being produced for Listed Buildings. This document should clearly set out the requirements for developments affecting the setting of listed buildings, not the 'Development Affecting Conservation Areas' SPD.</p>	<p>English Partnerships and Gallagher request that this paragraph be deleted from the document.</p>	<p>Many Listed Buildings are located within Conservation Areas and, by their nature, Conservation Areas often contain several Listed Buildings. The two often go hand-in-hand, and there will therefore inevitably be a degree of overlap between SPDs addressing these topics. However amendments have been made to paragraphs 2.19-2.20 in response to Representations 22032 and 22100 and therefore the issue has been overtaken by these revisions.</p>	<p>No further change.</p>
<b>2.21</b>					
22095 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships and Gallagher object to the current wording of the last sentence of paragraph 2.21. Paragraph 4.1 of PPG15 states that designation provides the basis for policies to preserve or enhance their character or appearance. Therefore those elements of interest should be identified as a part of the process of designating an area as a conservation area. PPG15 also states that policies should be developed which identify what aspects of the character or appearance should be preserved or enhanced and the means by which that objective is to be pursued (paragraph 4.9). However, no reference is made to the 'setting' of conservation areas in PPG15.</p>	<p>The text as currently drafted is too prescriptive and should be deleted or revised to read:          'The District Council will refuse Outline Applications for developments within Conservation Areas, or affecting their character or appearance, where the information submitted is not sufficient to determine whether or not the proposal would preserve or enhance that Conservation Area'.</p>	<p>Agree the revised wording referring to "affecting their character or appearance" rather than "affecting their setting" more accurately reflects Government guidance in Planning Policy Guidance note 15. The last sentence of paragraph 2.21 should be amended accordingly.</p>	<p>Amend the last sentence of paragraph 2.21 to read:          "The District Council will refuse Outline Applications for developments within Conservation Areas, or affecting their character or appearance, where the information submitted is not sufficient to determine whether or not the proposal would preserve or enhance the Conservation Area."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22101 - Steeple Morden Parish Council	Object	We cannot find any reference under what circumstances the Planning Authority would consider the use of an Article 4 direction nor when it would consider withdrawing permitted development rights.		Agree it would be useful to cover Article 4 Directions within the SPD. It would also be useful to add a note to explain the implications for contravening legislation.	<p>Add a new section after paragraph 2.21 as follows:</p> <p>"ARTICLE 4 DIRECTIONS</p> <p>2.22 In order to restrict the right of landowners from carrying out certain types of development, an Article 4 Direction can be placed on specific buildings or areas. This enables the local authority to require permission for what is otherwise allowed without consent. This is despite the current changes to the permitted development rights to landowners which are in the process of being update. This does not necessarily mean that permission would be refused, but allows the authority to assess any potential impact to the buildings, the street scene and the Conservation Area.</p> <p>2.23 It is recommended the District Council should be contacted prior to undertaking any work to discuss the development proposal to establish whether the development would be permitted and whether planning permission will be needed for all or part of the work.</p> <p>Contravention of the legislation relating to Conservation Areas may result in the local planning authority taking legal action."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22181 - Great Shelford Parish Council	Object	No mention is made of Article 4 direction - this was suggested for some areas in the Great Shelford Conservation policy document. It would make owners and developers aware of how minor changes can affect the harmony of a terrace of cottages for example and establish ground rules for extensions such as front porches.		Agree it would be useful to cover Article 4 Directions within the SPD. It would also be useful to add a note to explain the implications for contravening legislation.	<p>Add a new section after paragraph 2.21 as follows:</p> <p>"ARTICLE 4 DIRECTIONS</p> <p>2.22 In order to restrict the right of landowners from carrying out certain types of development, an Article 4 Direction can be placed on specific buildings or areas. This enables the local authority to require permission for what is otherwise allowed without consent. This is despite the current changes to the permitted development rights to landowners which are in the process of being update. This does not necessarily mean that permission would be refused, but allows the authority to assess any potential impact to the buildings, the street scene and the Conservation Area.</p> <p>2.23 It is recommended the District Council should be contacted prior to undertaking any work to discuss the development proposal to establish whether the development would be permitted and whether planning permission will be needed for all or part of the work.</p> <p>Contravention of the legislation relating to Conservation Areas may result in the local planning authority taking legal action."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22096 - English Partnerships and Gallagher Longstanton Limited	Object	If specific additional information is required to enable assessment of applications in conservation areas (including outline applications) this should be set out in this document to provide guidance to applicants and to avoid delay in determining planning applications. The list of information requirements should also specify the circumstances in which the information may be required and cross reference pre-application discussions with officers to confirm the circumstances for additional information. Furthermore, development proposals that are not within conservation areas should not be required to provide additional information.		<p>Paragraph 2.21 states that Outline applications may need to provide additional information "such as key elevations, locations of structures, details of access et cetera" in order to judge the impact of a development proposal on the character and appearance of a Conservation Area. The type of additional information that may be required will be specific to the development proposal and the Conservation Area affected. Therefore it is not possible to foresee every eventuality and provide a comprehensive list within the SPD. It is recommended that pre-application discussions are held with officers before submitting any planning application that may affect the character or appearance of a Conservation Area. Such discussion may be able to highlight potential issues or areas where additional information may be required to supplement an Outline planning application. Therefore it would be helpful for the text of the SPD to encourage pre-application discussions with officers.</p> <p>Any development proposal with the potential to affect the character or appearance of a Conservation Area will be required to comply with the need to provide sufficient information to judge its impact. This may include development proposals outside a Conservation Area, and is consistent with Government guidance in Planning Policy Guidance note 15.</p>	<p>Add the following after the third sentence in paragraph 2.21: "Consultation with SCDC officers prior to submission of a planning application is encouraged to ensure applicants provide sufficient information with their application to judge its impact."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>Appendix 2 - Contact Details and Further Information</b>					
<i>Local information</i>					
22196 - Cambridge Preservation Society	Object	Should also refer to the Landscape Guidance SPD.		Agree.	Add "Landscape Guidance for Development Sites SPD" to the list of other relevant SPDs by SCDC in Appendix 2.

*National information*

22055 - English Heritage	Support	The SPD for Conservation Areas provides a helpful and accessible guide to current policy and advice. We are pleased to see references in the bibliography to recent English Heritage publications on renewable energy and methods of assessing important views.		Support noted.	No change.
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# *Open Spaces in New Developments Supplementary Planning Document*

## *Public Participation Report*

Chapter 1 - Introduction to the Supplementary Planning Document

1.1

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
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### *Chapter 1 - Introduction to the Supplementary Planning Document*

1.1

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22119 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher Longstanton Ltd are concerned that there are parts of the SPD which are seeking to create new policy rather than providing greater detail on the policies in adopted DPDs. We are concerned that this approach is in conflict with national guidance. As a consequence such an approach also would not accord with the requirements of an SPD as set out at section 19 of the Planning and Compulsory Purchase Act (2004). English Partnerships and Gallagher Longstanton Ltd are also concerned that the wording of the SPD is too prescriptive. Several examples of this are referred to in our representations.		<p>Many points raised in the objection are addressed against other objections against specific parts of the SPD, and are not repeated here. This includes a number of proposed changes which reflect some of the points raised. Following these changes it is not considered that the plan imposes additional policy that should have been included within a Development Plan Document. It is also necessarily prescriptive in order to provide clear guidance to developers.</p> <p>With regard to the use of standard costs, there use reflects guidance in Circular 05/2005 -</p> <p>'B33. Formulae and standard charges are quantitative indications of the level of contribution likely to be sought by a local planning authority, through a planning obligation, towards the provision of infrastructure that is necessitated by a new development. Local authorities are encouraged to employ formulae and standard charges where appropriate, as part of their framework for negotiating and securing planning obligations. These can help speed up negotiations, and ensure predictability, by indicating the likely size and type of some contributions in advance. They can also promote transparency by making indicative figures public and assist in accountability in the spending of monies.'</p> <p>It is considered that the formula provided in the SPD meet the requirements of the circular.</p>	No Change.
22174 - Great Shelford Parish Council	Object	This is a useful but quite complex document.		Support noted.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22150 - Cambridgeshire County Council	Support	In general support.		Support noted. Specific points are addressed against separate representations.	No Change.
22220 - East of England Regional Assembly	Support	The Regional Planning Panel Standing Committee considered the attached report at the meeting of 27th June 2008 and endorsed the recommendation that: 'The four draft Supplementary Planning Documents prepared by South Cambridgeshire District Council are in general conformity with the RSS.'		Support noted.	No change.
<b>1.2</b>					
22048 - The National Trust	Object	The National Trust regrets that the full hierarchy of green infrastructure has not been considered in the Draft SPD. The highest level of the provision hierarchy i.e. strategic open space, has been ignored in spite of the fact that it will play an important role for the new communities. Three such National Trust properties, Wimpole, Anglesey Abbey and the expanding Wicken Fen, already successfully provide the strategic open space function but all could benefit from improvements to cycling and walking links from the new communities and from open spaces lower down the hierarchy. The National Trust would hope Section 106 funding would be available to help finance the provision of the links and improvements to the facilities provided within the strategic open spaces.	The National Trust regrets that the full hierarchy of green infrastructure has not been considered in the Draft SPD. The highest level of the provision hierarchy i.e. strategic open space, has been ignored in spite of the fact that it will play an important role for the new communities. Three such National Trust properties, Wimpole, Anglesey Abbey and the expanding Wicken Fen, already successfully provide the strategic open space function but all could benefit from improvements to cycling and walking links from the new communities and from open spaces lower down the hierarchy. The National Trust would hope Section 106 funding would be available to help finance the provision of the links and improvements to the facilities provided within the strategic open spaces.	Supplementary Planning Documents cannot introduce new policy, rather they elaborate upon policies in the adopted Development Plan Documents. Policies SF/10 and SF/11 in the Development Control Policies Development Plan Document refer to Outdoor Play Space, Information Open Space and New Developments, and the standards that will be used to calculate contributions from development. Strategic Open Space is not included within the scope of these policies. As a result, Strategic Open Space is beyond the scope of the SPD as has not been included.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>1.4</b>					
22120 - English Partnerships and Gallagher Longstanton Limited	Object	<p>Paragraphs 1.4</p> <p>English Partnerships/ Gallagher believe that the use of the word 'visible' in this paragraph is inappropriate. The requirement for children's play areas should be for safety which does not necessarily require that play areas are "overlooked by family homes" (as required by paragraph 4.35 of the SPD). We consider that a requirement for visibility would restrict design solutions, particularly in the case of NEAPs which require a wider buffer zone. English Partnerships/ Gallagher seek the deletion of the word 'visible' from this paragraph to be replaced by 'overlooked to provide natural surveillance'.</p>	<p>English Partnerships/ Gallagher seek the deletion of the word 'visible' from this paragraph to be replaced by 'overlooked to provide natural surveillance'.</p>	<p>Paragraph 1.4 seeks to ensure children's play areas are designed into development proposals and located such that they will be very accessible and visible, and not located in left over unused spaces, for example tucked away in a corner. As such, they should be located within the heart of the development where they would be visible and overlooked, which provides natural surveillance and improves their safety. This is considered a sound element of the SPD.</p>	No change.
22058 - English Heritage	Support	<p>Open space has a vital role in defining townscape - from garden squares and village greens to more formally laid out public parks. We hope that the design and layout of new neighbourhoods will draw on the historically successful examples, which often rely on visual enclosure of space as an integral part of townscape, and use space to define distinct communities.</p>		<p>Support noted.</p>	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>1.5</b>			<p>22033 - University of Cambridge</p> <p>Object      Greater clarity about the application of this Open Space SPD to Area Action Plans should be provided. Reference is made in the draft SPD to 'a number of Area Action Plans for major developments that contain specific policies on open space that vary from the district wide policy. The relevant Area Action Plans should be specified as all are now adopted or in advanced stages of preparation. It should also be made clear which parts of the SPD (if any) apply to development in the Area Action Plan areas.</p>	<p>i) Specify the Area Action Plans referred to</p> <p>ii) Clarify which parts of the SPD (if any) apply to the Area Action Plan areas</p>	<p>It is agreed that further clarification could be provided.</p> <p>Add new paragraph after 1.5: "Area Action Plans that address sites on the edge of Cambridge (Cambridge East AAP, Cambridge Southern Fringe AAP, North West Cambridge AAP) utilise the Cambridge City Council Open Space standards. The standards and costs included in chapter 2 of this document therefore do not apply to these area."</p>

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
1.11				

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22121 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships/ Gallagher believe that the 50:50 split of children's play space between formal and informal proposed in this paragraph is impractical. There is no justification in national policy guidelines for the insistence on 50% of equipped play space. Furthermore this requirement is inconsistent with the Northstowe AAP at paragraph 10.11 which requires that 'up to 50%' [of children's play areas] will be in the form of LAPs, LEAPs, NEAPs and SIPs.</p> <p>When the walk time accessibility standard and the minimum size standard for LAPs, LEAPs and NEAPs are combined with a requirement for equipped play space of 0.4ha per 1000 population, the quantity of play space can be demonstrated to be excessive and unreasonable.</p>		<p>It is the role of this SPD to provide guidance on how the adopted LDF policies should be implemented. It is entirely appropriate to provide guidance on the form the 0.8 hectares of children's playspace should take. The Council's 'Recreation Study - Audit and Assessment of Need for Outdoor Playspace and Informal Open Space in South Cambridgeshire June 2005' (subject to public consultation in November 2004) paragraph 3.39 states, 'This significant shortfall in Formal Children's Playspace, when combined with the accessibility problems outlined above, suggest that it would be sensible to establish a high standard for the provision of Formal Children's Playspace in new developments. The higher figure of 0.8 hectares per 1,000 population is therefore selected. A split between formal and informal should also be maintained at 50% each where appropriate.'</p> <p>The 50/50 split of formal and informal playspace is considered an appropriate starting point for considering the wide range of new developments that will be considered using this SPD, in a situation where provision across the district is relatively poor compared to the LAPS / LEAPS / NEAPS model. It provides a clear point for developing a contributions model for off site provision. 'The Development of a Recreation Policy for South Cambridgeshire District Council' background document used model to calculate the split between the different types of provision in order to calculate costs, rather than advocate a different geographical distribution of the different types of play spaces. Used for this purpose the document is sound.</p> <p>It is acknowledged that 50% may not be required to meet the needs of a new major development, and this is reflected</p>	<p>Amend paragraph 1.11 to read: "The starting point for the mix of Children's Play Space will be 50% formal and 50% informal. A lower percentage of formal space (and consequently higher level of informal children's play space) may be acceptable if it can be demonstrated that provision of the LAPS /LEAPS / NEAPs hierarchy can be achieved appropriately with less than 50% formal provision."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22122 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 1.11 - second sentence The standard to which this sentence refers is the standard for children's play space. Appendix 4 of this SPD is wider and is headed 'Areas and Facilities that do not contribute toward open space standards' and the list of areas and facilities contained in Appendix 4 appears to be a mix of play spaces and open space. English Partnerships/ Gallagher recommend that the references and headings in this paragraph and in Appendix 4 should be consistent.	English Partnerships/ Gallagher recommend that the references and headings in this paragraph and in Appendix 4 should be consistent.	in the Area Action Plan policy. With regard to onsite provision more generally, it is acknowledged that there may be cases where provision of the playspace hierarchy can be achieved with less than 50% of the play space being of the formal variety. A change to the SPD is proposed to reflect this point.	Move the second sentence of paragraph 1.11 to form beginning of paragraph 1.12.

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
1.13				

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22123 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships/ Gallagher believes that this paragraph imposes additional open space standards to those included in Policy SF/11 of the Development Control Policies DPD. The standards in SF/11 relate to the provision of open space associated with residential populations within new communities to benefit the community as a whole, whether residents, the workforce or visitors. Furthermore Policy SF10 quite clearly states that 'all residential development will be required to contribute towards outdoor playing space' and there is no reference to other types of development.</p> <p>It is not the function of an SPD to introduce new policy and to do so would be contrary to government guidance (para 6.1 of PPS12).</p>	<p>English Partnerships/ Gallagher strongly recommend that paragraph 1.13 be deleted from the SPD.</p>	<p>The intention of the paragraph is to highlight the benefits the provision of open space can bring to types of development other than residential. It is not intended to set a specific requirement or standard for provision for non-residential development. It is agreed that this could be clarified by amending the paragraph.</p> <p>In addition, paragraphs 2.1, 2.5 and 2.15 would benefit from further clarification that the contribution mechanism has been put in place to address additional need generated by residential development. The role of formulas in the SPD are to identify contributions that would be sought to mitigate additional need generated by residential development, reflecting policy SF/11 of the adopted Development Control Policies DPD. The requirements are triggered by a net gain in need, which should reflect the nature of the net loss as well as the net gain of dwellings, and should therefore be based on the net increase in occupants rather than simply numbers of dwellings.</p>	<p>Amend paragraph 1.13 to read:</p> <p>"In addition to the standards detailed above, informal open space provision will be encouraged as part of business park, retail and large-scale commercial developments; this is for the benefit and well being of the workforce and also visitors to the site. Any spaces provided should have regard to the nature and location of the development."</p> <p>Amend paragraph 2.1 to read:</p> <p>"When there will be a net increase in the number of occupants as a result of a residential development (calculated according to paragraph 2.7 below). This includes conversions and change of use. It includes bed-sits, flats, sheltered housing and affordable housing."</p> <p>Amend 1st sentence of paragraph 2.5 to read:</p> <p>"Calculation of provision required for a residential development involves establishing the net increase in occupants resulting from a residential development, using an occupancy rate for different property types within the development based on the number of bedrooms."</p> <p>Amend 1st sentence of 2.15 to read:</p> <p>"The level of contribution sought by the Local Planning Authority will be calculated according to the net increase of occupants that will result from a residential development according to the table at paragraph 2.7 above."</p>

<b><i>Representation No.</i></b>	<b><i>Nature</i></b>	<b><i>Representation Summary</i></b>	<b><i>Change To Plan Sought</i></b>	<b><i>Council's Assessment</i></b>	<b><i>Change To Draft SPD</i></b>
22182 - Cambridge Preservation Society	Object	Where are considerations made in relation to hospital, sheltered housing and similar sites? Such needs to be clarified and adequate green space provisions must be included to ensure safer, healthier and more sustainable living, working etc environments.		Sheltered housing would be addressed by the requirements of residential development.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22029 - Wm Morrison Supermarkets Plc	Object	Provision of open space should be fairly and reasonably related in scale to the development. Flexibility should be allowed for off-site provision	Amend paragraph 1.13 to ensure open space fairly and reasonably related to the development, and to allow flexibility with the potential for off-site provision where appropriate.	<p>The intention of the paragraph is to highlight the benefits the provision of open space can bring to types of development other than residential. It is not intended to set a specific requirement or standard for provision. It is agreed that this could be clarified by amending the paragraph.</p> <p>In addition, paragraphs 2.1, 2.5 and 2.15 would benefit from further clarification that the contribution mechanism has been put in place to address additional need generated by residential development. The role of formulas in the SPD are to identify contributions that would be sought to mitigate additional need generated by residential development, reflecting policy SF/11 of the adopted Development Control Policies DPD. The requirements are triggered by a net gain in need, which should reflect the nature of the net loss as well as the net gain of dwellings, and should therefore be based on the net increase in occupants rather than simply refer to dwellings.</p>	<p>Amend paragraph 1.13 to read:</p> <p>"In addition to the standards detailed above, informal open space provision will be encouraged as part of business park, retail and large-scale commercial developments; this is for the benefit and well being of the workforce and also visitors to the site. Any spaces provided should have regard to the nature and location of the development."</p> <p>Amend paragraph 2.1 to read:</p> <p>"When there will be a net increase in the number of occupants as a result of a residential development (details of how this is calculated are provided below). This includes conversions and change of use. It includes bed-sits, flats, sheltered housing and affordable housing."</p> <p>Amend 1st sentence of paragraph 2.5 to read:</p> <p>"Calculation of provision required for a residential development involves establishing net increase in occupants, using an occupancy rate for different property types within the development based on the number of bedrooms."</p> <p>Amend 1st sentence of 2.15 to read:</p> <p>"The level of contribution sought by the Local Planning Authority will be calculated according to the net increase of occupants that will result from a residential development according to the table at paragraph 2.7 above."</p>

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b><i>Chapter 2 - Calculating Provision Requirements</i></b>					
<b>2.1</b>					
22225 - Longstanton Parish Council	Object	Recreation Study - annex 1. The village population figures are from 2001. While its is recognised that the population will continue to rise, we have increased in size so much since 2001 that we insist upon the use of up-to-date figures. Otherwise, the "50% increase" will likely get missed off later interpretation of the population.		The representation seeks to change a document that was not the subject of the consultation.	No change.
<b>2.4</b>					
22183 - Cambridge Preservation Society	Object	No reference is made to the provision of any indoor sports facilities and commuted sums (ref also Cambridge Horizons Sport Strategy). Will there be a separate SPD?		This SPD addresses implementation of the public open space standards. The requirement for other community facilities is addressed by Development Control Policies DPD Policy DP/4, will be addressed by the Planning Obligations SPD.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
2.7	Object 22212 - Marshall of Cambridge (Holdings) Limited	<p>There is no evidence to support the assertion that occupancy levels at Cambourne are considered a reasonable proxy from new developments across the district. What evidence that is available suggests that occupancy levels at Cambourne are higher than elsewhere in the district because of the attraction of new housing to younger families at a lower price than similar accommodation in the more mature villages which are the norm across the district. Given that this factor is one of the principal inputs into the calculation a better evidence base is required to inform sound conclusions.</p>		<p>The creation of a formula approach to provision requires a population per dwelling figure to be used. In order to better reflect the nature of a development, that figure must acknowledge that the number of people depends on the size of the dwelling. Many SPD utilises a basic formula, such as number of bedrooms plus one to establish the population of a dwelling. However, it is considered that a more accurate reality based formula provides a fairer approach. The Cambourne survey offers information on how a new development is actually occupied, and is considered the best figure available for this purpose. The 2001 census does not provide sufficient detail to provide an accurate district wide population by dwelling size, although a reasonable estimate can be extrapolated, and this does not differ substantially from the Cambourne figures.</p>	<p>Add to paragraph 2.7: "Where there is alternative robust information on population in relation to a specific major development this will be used subject to the approval of the Local Planning Authority."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22124 - English Partnerships and Gallagher Longstanton Limited	Object	Use of Cambourne as the model for occupancy rates and sports participation rates is inconsistent with the basis on which the standards for open space have been developed ('The Development of a Recreation Policy for South Cambridgeshire District Council' - October 2005) - recommended standards based on an audit of existing facilities and participation rates across the district set against existing levels of population. Page 1 refers to Cambourne, being unrepresentative of overall patterns of supply and demand throughout the District. It is suggested that when applying standards to major new developments such as Northstowe, the occupancy rates proposed within the planning application and agreed by the District Council are used.	English Partnerships/ Gallagher therefore request the following addition to para 2.7: "Where there is alternative information in relation to a specific development this will be used."	The creation of a formula approach to provision requires a population per dwelling figure to be used. In order to better reflect the nature of a development, that figure must acknowledge that the number of people depends on the size of the dwellings. Many SPD utilise a basic formula, such as 'number of bedrooms plus one' to establish the population of a dwelling. However, it is considered that a more accurate reality based formula provides a fairer approach. The Cambourne survey offers information on how a new development is actually occupied, and is considered the best figure available for this purpose. The 2001 census does not provide sufficient detail to provide an accurate district wide population by dwelling size, and although a reasonable estimate can be extrapolated, and this does not differ substantially from the Cambourne figures.	Add to paragraph 2.7: "Where there is alternative robust information on population in relation to a specific major development this will be used, subject to the approval of the Local Planning Authority."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>2.13</b>					
22163 - Cambridge Preservation Society	Object	Object to the detailing of the clause as no contributions (such as Section 106 and others) are made to informal off-site Open Space and the Society suggests that payments for such includes not only formal play or sports provisions but also informal and (semi-)natural land i.e. other nearby major and other open spaces and green corridors including country parks and wildlife sites such as the Coton C Reserve, Wandlebury CP, Magog Down, Milton CP, Wicken Fen, Greater Fen etc and others as emerging in near future close to Cambridge but also other villages and settlements within the District where relevant.		The intention of the paragraph is to establish what off-site payments may be used for. In essence they must be used to contribute towards the open space standard described in policy SF/11 of the Development Control Policies DPD. Funding could therefore be used to provide or enhance informal open space according to the definition, and this could be clarified. However, it does not include contributions towards strategic open spaces, as they would not meet the definition provided by the policy.	Amend 2nd and 3rd bullet of paragraph 2.13 to read:  "The laying out and construction of land including sport pitches, facilities and equipment for play and / or sport, and informal openspace;  The improvement or upgrading of land including sports pitches, facilities and / or equipment for play or sport, and informal openspace;"

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
2.14				

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22125 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraphs 2.14 to 2.16 English Partnerships/ Gallagher understand that the financial contribution per person required to be made by a developer if the open space and play standards cannot be met on site are based on research contained in 'The Development of a Recreation Policy for South Cambridgeshire District Council' cited earlier. English Partnerships/ Gallagher believe that there are significant flaws in the analysis in that report which call into question all the costs shown in this SPD. English Partnerships/ Gallagher therefore recommend that the proposed contributions per person for Outdoor Sport and for Equipped Children's Play, which cannot be justified by the analysis, should be revised to take into account the comments made on the research report, as set out in Annex A to these representations.	English Partnerships/ Gallagher therefore recommend that the proposed contributions per person for Outdoor Sport and for Equipped Children's Play, which cannot be justified by the analysis, should be revised to take into account the comments made on the research report, as set out in Annex A to these representations.	The original study by Leisure and the Environment was undertaken to develop a mechanism for calculating capital and maintenance costs likely to be required on 2.8 hectares of open space in order to apportion appropriate costs to create a standard formula. A number of assumptions were made in regard to costs, layout and other factors, and the original assessment was done on the basis of information relating to 2005 and in some cases 2003 cost estimates from NPFA and others. It was not the role of this study to alter this standard, which has already been adopted in the Development Control Policies DPD.  The main objection from EP / Gallagher's seeks to undermine the overall conclusions by casting doubt on the method of calculation, without proposing an alternative way of estimating requirements and costs. Issues have been raised regarding the team generation rates, and the size of pitches that have been assumed, and the costs that have been used. The objections only criticise the means of assessment, and despite the wording of the proposed change to the plan, make no positive suggestions about a preferred methodology. The points raised have been considered in detail by the Council.	No change.  Outdoor Sport  Team Generation Rates The L&E study calculated Team Generation Rates based on the total population, a methodology criticised by the objector as being contrary to Sport England advice. Sport England (and indeed the Football Association) use Team Generation Rates to estimate the number of pitches required for each age group, so senior pitches are based on Team Generation Rates for the adult

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			<p>population, etc. In reality there is little or no difference to the overall figure for teams, so long as the basis for the calculation is then applied equally to the overall population. The Team Generation Rates of 1 senior team per 971 people in the whole population is broadly the same as 1 team per 130 people in the adult age group (a figure derived from FA figures using the preferred methodology). Whilst the method used is not described clearly in the L &amp; E report, the methodology is easier to apply to a whole district's population (or that of a particular size of development) when calculating overall requirements, and represents a reasonable approach.</p> <p>Pitch requirements  With regard to the issues surrounding teams per pitch raised by the objector, the number of pitches required for each team is not as simple as saying that each team plays at home once every fortnight and each pitch is capable of 2 matches a weekend, therefore every pitch accommodates 4 teams. Pitch need depends on the peak day of use - in Cambridgeshire from evidence available (and used in similar Northstowe calculations) this is both Saturday and Sunday, and not in equal measure. In Northstowe these factors produced the following:</p> <ul style="list-style-type: none"> <li>* 36 senior teams require 12 pitches (average 3 teams per pitch)</li> <li>* 29 junior teams required 13 pitches (average 2.2 teams per pitch)</li> <li>* 26 mini teams require 7 pitches (average 3.7 teams per pitch)</li> <li>* Overall 91 teams require 32 pitches i.e. 2.84 teams per pitch</li> </ul> <p>Similarly the geographical distribution of teams particularly in a rural area like South Cambs must be considered - a pitch available in say Linton would be of</p>	

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			<p>no use to a team in Swavesey. The above ratios for Northstowe may if anything be low. The actual ratio between football pitches and teams overall of 2.84 may be more accurate than 2 (in L&amp;E's original) or 4 (in the objection). This correction would impact on the apportionment within the 1.6 hectare sport standard.</p> <p>All senior rugby takes place on Saturday so each pitch is capable of accommodating one match per week (ie two teams per pitch). The cricket assumption already utilises 4 teams per pitch. If the rates were changed, increasing the number of football teams per pitch, it would slightly reduce the football component in the calculation. Allowing for a proportion of pitches to be mini rather than junior, and applying the higher team generation rate would be in the region of 0.79ha rather than 0.98.</p> <p>The impact of the changes could be that using this particular formula approach would not add up to 1.6 hectares. However, given the South Cambridgeshire approach towards avoiding sharing of cricket and football pitches, it could be argued that a higher proportion could be used for cricket. This is an alternative form of grass pitch that would not impact on the resulting costs.</p> <p>Costs A number of assumptions were made in regard to costs, layout and other factors, and the original assessment was done on the basis of information relating to 2005 and in some cases 2003 cost estimates from NPFA and others. It is agreed that one option to keep costs up to date would be to completely revise costs to 2008 costs and methods of construction etc. However, the overall capital cost per person recommended by L&amp;E is directly</p>	

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			<p>in line with calculations undertaken for a number of other local authorities, as described on the Sport England website, and is considered to be reasonable.</p> <p>It should be noted that the capital costs used by L+E to inform the formula are considered low; should capital costs be reviewed to ensure that they truly represent the 2008 costs, they are likely to increase significantly.</p> <p>The objector makes the comment that the actual cost of maintenance of a MUGA / artificial pitch will depend on the type of pitch produced, however, for the purposes of developing a formula for off site contributions, an assumption must be made.</p> <p>Overall it is considered that the study provides a reasonable method of how much of the 1.6 hectares for sport would be used for grass pitches, and how much for other facilities. Amendments to reduce the proportion of some pitch types over another would not significantly alter the costs.</p> <p>Children's Playspace</p> <p>It is the role of this SPD to provide guidance on how the adopted LDF policies should be implemented. It is entirely appropriate to provide guidance on the form the 0.8 hectares of children's playspace should take. The Council's 'Recreation Study - Audit and Assessment of Need for Outdoor Playspace and Informal Open Space in South Cambridgeshire June 2005' (subject to public consultation in November 2004) paragraph 3.39 states, 'This significant shortfall in Formal Children's Playspace, when combined with the accessibility problems outlined</p>	

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			<p>above, suggest that it would be sensible to establish a high standard for the provision of Formal Children's Playspace in new developments. The higher figure of 0.8 hectares per 1000 population is therefore selected. A split between formal and informal should also be maintained at 50% each where appropriate.'</p> <p>The 50/50 split of formal and informal playspace is considered an appropriate starting point for considering the wide range of new developments that will be considered using this SPD, in a situation where provision across the district is relatively poor compared to the LAPS / LEAPS / NEAPS model. It provides a clear point for developing a contributions model for off site provision. 'The Development of a Recreation Policy for South Cambridgeshire District Council' background document used model to calculate the split between the different types of provision in order to calculate costs.</p> <p>It is acknowledged that 50% may not be required to meet the needs of a new major development, and this is reflected in the Area Action Plan policy. With regard to onsite provision more generally, it is acknowledged that there may be cases where provision of the playspace hierarchy can be achieved with less than 50% of the play space being of the formal variety. A change to the SPD is proposed to reflect this point.</p> <p>With regard to the offsite contribution, it is considered that the 50/50 split of formal / informal should remain the starting point. The purpose of the L&amp;E report to determine how much formal playspace should be in the form of LAP / LEAP or NEAP. It is considered that the end result is a sound proportionment, which creates a reasonable cost requirement per person.</p>	

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				<p>The representation also criticises the difference in cost between informal children's playspace, and the informal open space, querying why the latter is so much higher. From the definition of informal open space, it encompasses more formal development such as planted areas and meeting places, that would imply a higher cost. It is sound that it is charged at a higher rate.</p> <p>It should be noted that the capital costs used by L+E to inform the formula for LEAPs and NEAPs in particular are considered low; should capital costs be reviewed to ensure that they truly represent the 2008 costs, they are likely to increase significantly.</p>	
<b>2.17</b>					
22126 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that it should be made clear in this paragraph that the Template for a s.106 Agreement set out in Appendix 7 can only be indicative. Each s.106 agreement will be specific to the development, especially in the case of major new developments such as Northstowe.		<p>It is acknowledged that s106 agreements may vary, but the purpose of this SPD is to provide clear guidance for developers, in doing so simplify and speed up the planning process. A change is proposed to clarify that the actual s106 agreement may vary from the template.</p>	<p>Add to end of paragraph 3.2: "It is acknowledged that this standard template may require revision in relation to the specific circumstances of an application."</p>
<b>2.18</b>					
22164 - Cambridge Preservation Society	Support	Para 2.18 - ownership: comment that the Society is proud to be one of the local trusts managing 2 large open spaces and other designated wildlife sites accessible to local people of nearby villages and expanding city of Cambridge and to the benefit of wildlife.		<p>Noted.</p>	<p>No change.</p>

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<b>2.20</b>					
22127 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the requirements set out in these paragraphs are over prescriptive. In the case of Northstowe, a number of options are being investigated for the future ownership and management of the open space and facilities. For example it is inappropriate for the Council to declare in paragraph 2.20 that transfer to a management company "is the Council's least preferred option and will be avoided where possible" as this prejudges the outcome of the investigation of various options for management. English Partnerships/ Gallagher recommend that paragraphs 2.20 and 2.21 are deleted from the SPD.		This SPD must address a wide variety of open spaces in a wide variety of locations. It is acknowledged that there are a variety of ownership and management options. However, the Council's preference for most developments is for them to be managed by a Parish Council or locally accountable community organisation, and it is important that this preference is stated in the SPD.  This preference reflects past experience where transfer to management companies has led to difficulties and frustration by local communities.	Amend Paragraph 2.20 to read:  "It is strongly advised that in the majority of cases new open spaces and facilities should come under the freehold ownership of the Parish Council or Town Council or a local community organisation or trust that has clear accountability, is properly constituted, represents the best interests of the whole community and appropriate access by the community is guaranteed into perpetuity."  Amend Paragraph 2.21 to read:  "If a developer, in consultation with the District Council and Parish Council, decides to transfer the site to a management company, the District Council will require appropriate conditions to ensure public accountability, access and appropriate arrangements in the event that the management company becomes insolvent (a developer guarantee)."
<b>2.24</b>					
22165 - Cambridge Preservation Society	Object	Para 2.24 - maintenance sum: comment - suggested is that not only a maintenance sum is established but also may include assets which beyond 10 year maintenance period will generate income and thus better ensure the long-term looking after the site (e.g. freehold of a building which can be let and income generated support a green space).		In major developments a number of methods of future maintenance are being explored.  A ten year maintenance period is considered appropriate regarding facilities that directly meet the needs of the development, given the guidance in circular 05/2005.	No change.

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<b>2.25</b>					
22213 - Marshall of Cambridge (Holdings) Limited	Object	If this is a reference to paragraph B18 in annex B of the circular it is a misinterpretation. It is paragraph B19 which refers to circumstances where the intention is that the facilities to be supplied are for wider public use. That paragraph (B19) spells out the general principle that the cost of subsequent maintenance and other relevant expenditure associated with the developers contributions should normally be borne by the body of authority in which the asset is to be vested. Calculation over a period of five years is excessive. A period of one year is appropriate.		<p>It is agreed that paragraph 2.25 and its references to the circular could be clarified.</p> <p>Disagree. 5 years for 'pump priming' is considered a reasonable term which reflects the intentions of Circular 05/2005 paragraph B19. A one-year period is not considered sufficient.</p>	<p>Amend paragraph 2.25 to read:</p> <p>"In accordance with Planning Circular 05/05 (paragraph B18) this 10 year requirement has been reviewed and is considered a fair and balanced approach for new provision predominantly for the benefit of the users of the associated development."</p>

  

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<b>2.26</b>					
22128 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that Paragraph 2.26 is redrafted to make it clear that pump priming contributions are not required in circumstances covered by paragraph 2.24. As currently drafted, there is the potential for double counting. Furthermore English Partnerships/ Gallagher believe that it is inappropriate to stipulate a 5 year period for payment of pump priming maintenance contributions. Circular 05/2005 at paragraph B19 makes clear pump priming contributions should reflect "the time lag between the provision of the new facility and its inclusion in public sector funding streams or its ability to recover its own costs".	English Partnerships/ Gallagher recommend that Paragraph 2.26 is redrafted by deleting "also" and "for 5 years" in the first sentence and inserting a sentence after this first sentence to read "Pump priming contributions will not be required where a commuted maintenance sum for 10 years is provided (as set out in paragraph 2.24)". In addition the reference in the first sentence to "paragraph 19" should be revised to "paragraph B.19".	It is agreed that the form of Maintenance payments is likely to take one form or the other rather than both in relation to a single facility, therefore paragraph 2.26 could be clarified. However, 5 years for 'pump priming' is considered a reasonable term which reflects the intentions of the circular paragraph B19.	<p>Add to end of paragraph 2.26:</p> <p>"Additional pump priming contributions will not be required where a commuted maintenance sum has been secured as set out in paragraph 2.24."</p> <p>Reference should also be to paragraph 'B'19 of the circular.</p>

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2.28				

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22129 - English Partnerships and Gallagher Longstanton Limited	Object	This paragraph sets out the maintenance contributions required per person which are based upon the findings of the 2005 report 'The Development of a Recreation Policy for South Cambridgeshire District Council'. English Partnerships/ Gallagher believe that this report does not provide credible justification for the cost figures for the reasons set out in Annex A of these representations. In particular, the maintenance contributions for Equipped Play Facilities, which are calculated as a percentage of the capital contribution for such facilities, cannot be justified by the analysis and should be revised.	<p>English Partnerships/ Gallagher recommend that an additional paragraph is inserted after paragraph 2.28 to read:</p> <p>"Standard costs for maintenance contributions from developers (as set out in paragraph 2.28) will not always represent the actual cost in every circumstance particularly where there are specific site circumstances or where maintenance arrangements are put in place on terms which might vary from these standard costs. For example this situation could arise at major development sites if the developer enters into a grounds maintenance contract with a management organisation. Therefore, where clear evidence can be produced to show that the required facilities can be provided or ongoing maintenance works carried out at costs which may differ from the costs shown in paragraph 2.28 of this SPD, whilst still achieving the appropriate, agreed specification then these actual costs should apply."</p>	<p>With regard to the actual costs, this objection only criticises the means of assessment, and despite the wording of the proposed change to the plan, makes no positive suggestions about a preferred methodology. The L&amp;E Report 2005 is considered to provide a reasonable method assessing general maintenance costs.</p> <p>It is acknowledged that there may be circumstances where maintenance arrangements are agreed through negotiation and reflect the actual circumstances of the site. This may be the case in relation to some major developments. However, the use of the formula included in paragraph 2.28 will provide an appropriate mechanism for the majority of sites, and alternative costs should only be used where appropriate justification is provided. It is considered that the approach to the contributions sought could be clarified with changes that better reflect the circular.</p>	<p>Add to end of paragraph 1.2: "The SPD includes standard charges indicating the level of contribution likely to be sought by the Local Planning Authority, as indicated by Planning Circular 05/05 Planning Obligations."</p> <p>Amend 1st sentence of 2.15 to read: "The level of contribution sought by the Local Planning Authority will be calculated according to the net increase of occupants that will result from a residential development according to the table at paragraph 2.7 above."</p> <p>Amend 2.28 to read:</p> <p>"The level of contribution sought by the Local Planning Authority for commuted maintenance will be as follows:</p> <p>Costs are based on research titled 'The Development of a Recreation, Policy for South Cambridgeshire District Council', prepared by consultants Leisure and the Environment in 2005, index linked (Building Cost All-in Tender Price Index) to 1st quarter of 2008. They represent a robust indicator of the level of contribution which will normally be required. If alternative costs were to be sought through negotiation with the Local Planning Authority, clear evidence would need to be produced to the satisfaction of the Local Planning Authority, to show that the required provision could be maintained for the appropriate period whilst still achieving the relevant agreed specification and quality."</p>

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<b>2.29</b>					
22130 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend the following is added at the end of paragraph 2.29: "Equally the parish council or management organisation must accept the transfer of the open space or facility following the successful conclusion of the agreed handover procedure. Appropriate text will need to be included in the provisions and/or schedules of the s106 agreement".	English Partnerships/ Gallagher recommend the following is added at the end of paragraph 2.29: "Equally the parish council or management organisation must accept the transfer of the open space or facility following the successful conclusion of the agreed handover procedure. Appropriate text will need to be included in the provisions and/or schedules of the s106 agreement".	The SPD confirms the need for early discussions between the developers and the Parish Council, in order to ensure that all aspects of the open space provision are fully discussed and agreement reached, including transfer of land.  Paragraph 2.29 clarifies that an open space must be appropriately maintained until it is handed over to the managing organization. It is not considered necessary to add the sentence proposed in the representation.	No change.

  

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<b>2.30</b>					
22166 - Cambridge Preservation Society	Object	Para 2.30 - comment - suggest change of first sentence: "Developers are also required to produce as built plans upon completion of features and full maintenance plans for all on-site informal open space, formal outdoors....." This to ensure proper and usable data is collated to aid smooth and safer management of the various sites.	Suggest change of first sentence: "Developers are also required to produce as built plans upon completion of features and full maintenance plans for all on-site informal open space, formal outdoors....."	This section addresses off site contributions, therefore the change is not appropriate. The provision of sufficient information regarding new open spaces is addressed in Appendix 1, and a revision is not considered necessary.	No change.

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<b>Appendix 1 - The Development Process</b>					
3.1					
22175 - Great Shelford Parish Council	Object	The Parish Council's main comment is that it would be very helpful if the DC could run a workshop so that Parish Councils would know how to make useful inputs into Section 106 agreements at an early stage. All too often in the past on large developments the Parish Council has been presented with a fait accompli. It is important the PC should be consulted separately on Section 106 proposals at a very early stage.	Noted. The comment has been passed on to the legal and Development Control team. Again early consultation with the Parish Council is recommended in the SPD.	No change.	
<b>The Process Flow Chart</b>					
22131 - English Partnerships and Gallagher Longstanton Limited	Object	Box 4 - 2nd bullet English Partnerships/ Gallagher believe that the requirement to provide a draft s106 Agreement at the point of submission of a planning application is not consistent with guidance on The Validation of Planning Application (ref. CLG: December 2008). This guidance states that a local planning authority may require a statement of 'the proposed heads of terms' to be submitted with the application. Therefore, as currently drafted, this paragraph is in conflict with national guidance and therefore is not in accordance with the requirements of an SPD as set out at section 19 of the Planning and Compulsory Purchase Act (2004).	English Partnerships/ Gallagher therefore recommend that this paragraph is amended so that reference is to the submission of 'a statement of the proposed heads of terms for a s106 agreement' and that reference to 'a draft s106 agreement' as well as the requirements set out in the second bullet point of this Box are deleted.	In order to speed up the planning application process, the SPD enables applicants to understand what the Council will be seeking with regard to s106, and to fill in a draft agreement. It is not a requirement, as made clear by paragraph 3.2 of the SPD, that states that where possible a planning application will be submitted with a draft section 106 agreement.  The subsequent paragraph in the flow chart illustrates the process where a draft agreement is not supplied. It is therefore not prescriptive, and not contrary to guidance.  It is acknowledged however, that the word 'completed' should not be used in this context, as the s106 information submitted will be a draft rather than a completed agreement.	Amend 1st sentence of paragraph 3.2 to read:  "The Planning Application should be submitted where possible with a draft Section 106 Agreement (based on the model agreement, but otherwise with a draft statement of the proposed heads of terms for a s106 agreement)."  Amend Box 4 - 2nd bullet to read:  "Developer submits a planning application accompanied by a Design and Access Statement along with a draft Section 106 Agreement (based on the model agreement, but otherwise with a draft statement of the proposed heads of terms for a s106 agreement)."

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<b>Appendix 2 - Detailed Information on What is Required</b>					
<b>4.1</b>					
22224 - Longstanton Parish Council	Object	<p>Longstanton golf course is a key amenity in the community. The Recreational Study is rather focussed on LAPs, NEAPS, and other acronyms for formal play areas and football pitches, etc. We believe this is wrong. Recreation includes not just publicly funded areas, but also areas to which the public has access.</p> <p>The golf course provides recreation for golfers, and also walking for countless others in the village.</p> <p>We strongly recommend the inclusion of the golf course in the assessment and that you consider the impact of its removal as a community facility.</p>		<p>The representation seeks to change a document that was not the subject of the consultation.</p>	No change.
<b>4.4</b>					
22132 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships/ Gallagher believe that it is inappropriate to refer to Cambourne in justification of higher levels of participation in all new developments. Not only is it inconsistent with the basis on which existing standards have been set in the Development Control Policies DPD, but Cambourne cannot be held out as representative of all future new developments. This is confirmed in Page 1 of the report 'The Development of a Recreation Policy for South Cambridgeshire District Council' of October 2005 that refers to Cambourne being unrepresentative of overall patterns of supply and demand throughout the District.</p>	<p>English Partnerships/ Gallagher therefore recommend that this paragraph is deleted from the SPD.</p>	<p>Disagree. The paragraph provides an example of participation rates in the district. It is not used to justify the standard, as this has already been adopted through the Development Control Policies DPD. It is included for information and should be retained in the document.</p>	No change.

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<b>4.6</b>					
22133 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the reference in this paragraph to "more local facilities such as swimming pools, artificial turf pitches and sports halls" is misleading in the context of the development of a sub-regional tariff. The reference to local facilities should be deleted; or the distinction between what is local and what is strategic should be clarified to avoid confusion over double counting of developer contributions.	English Partnerships/ Gallagher therefore request the following text be deleted: 'The Strategy also identifies the need for more local facilities such as swimming pools, artificial turf pitches and sports halls within the major growth areas' and request that the following sentence after 'development of a sub regional tariff for strategic sports facilities' be added: 'These will be clearly identified as appropriate to the sub-region as opposed to being for the needs of local residents'.	The operation of a tariff approach, and what elements of infrastructure it would cover, has yet to be established. The queries raised highlight that it should not be referenced in this SPD in advance of this work.	Delete last 2 sentences of 4.6.
<b>4.9</b>					
22134 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that "Artificial Turf Pitches on school sites" should be included within the standard for formal outdoor sports provision. At the end of para 4.9 we therefore request the additional text: 'Conversely, Artificial Turf Pitches will be included within the standard for community provision'	At the end of para 4.9 we therefore request the additional text: 'Conversely, Artificial Turf Pitches will be included within the standard for community provision'	Appendix 4 of the document establishes that facilities in educational ownership where community use is secured through written agreement can be included. A change to this paragraph is not required.	No change.
22184 - Cambridge Preservation Society	Support	School pitches should not be overused to the detriment of provisions for the school and the overall local community.		Support noted.	No change.

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<b>4.13</b>					
22135 - English Partnerships and Gallagher Longstanton Limited	Object	This paragraph stipulates that pitches should not overlap, e.g. by locating football pitches on the outfield of cricket pitches. English Partnerships/ Gallagher believe that this is contrary to NPFA guidance in the Six Acre Standard, and contrary to the approach adopted by consultants Leisure and the Environment in the report of October 2005 on which the Council have relied to define the developer contributions toward outdoor sports facilities.	The second and third sentences of this paragraph should be deleted and the following sentence inserted "It may be 'desirable' to avoid pitch sharing but it is recognised that in some circumstances overlapping of pitches is acceptable in the interests of an economic and efficient use of land, downstream maintenance costs and other wider objectives that developments have to meet".	There are increasing levels of difficulty being experienced across the District in relation to overlap of pitches between summer and winter sports due to the playing seasons overlapping in late spring and late summer; playing seasons have extended at both start and end.	"Pitches should not overlap as the summer and winter seasons now increasingly present potential conflict between sports at the end of each season; for example cricket and football pitches where seasons overlap."
<b>4.22</b>					
22186 - Cambridge Preservation Society	Object	Support the good management and design principles as suggested but needs to include more space for the pitch so that it can be adjusted to prevent excessive wear and tear at the goal mouth - i.e. needs at least an additional width of goal mouth to ensure quality provision and truly sustainable pitch maintenance.	A 50% allowance for run off and safety margins (which is included in the calculations) would allow pitches to be moved slightly from time to time, to overcome these issues. This also needs to be combined with quality construction for new pitches and good management and maintenance regimes to ensure that damage to vulnerable areas of the pitch is kept to a minimum.	No change.	
22186 - Cambridge Preservation Society	Object	The Society objects to flood lighting of pitches adjacent or within the Green Belt and Conservation Areas as such is adverse to the setting of the Green Belt and Conservation Areas. This needs to be clarified.	The Council's policy with regard to lighting is included within the Development Control Policies DPD, and appropriately addresses impact on surrounding areas. Additional policy in this SPD is not required.	No change.	

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>4.35</b>	Object	22136 - English Partnerships and Gallagher Longstanton Limited	English Partnerships/ Gallagher believe that the use of the word 'overlooked by family homes' in this paragraph is inappropriate. The requirement for children's play areas should be for safety which does not necessarily require that play areas are "overlooked by family homes". We consider that this requirement for being overlooked would restrict design solutions, particularly in the case of NEAPs which require a wider buffer zone. English Partnerships/ Gallagher seek the deletion of the word 'overlooked by family homes to provide informal surveillance' from this paragraph to be replaced by 'overlooked to provide natural surveillance'.	English Partnerships/ Gallagher seek the deletion of the word 'overlooked by family homes to provide informal surveillance' from this paragraph to be replaced by 'overlooked to provide natural surveillance'.	<p>Paragraph 4.35 seeks to ensure children's play areas are designed into development proposals and located such that they will be very accessible and visible, and not located in left over unused spaces, for example tucked away in a corner. As such, they should be located within the heart of the development where they would be visible and overlooked, which provides natural surveillance and improves their safety. The Council's preference is for Children's Play Areas to be overlooked by family housing, and this is reflected in the SPD.</p> <p>It is noted however that NEAP's can create greater levels of noise and require the larger buffer zone to help minimise the potential for noise pollution and disruption to residential property. The safety of young people using NEAP's is of paramount importance and it is expected that such facilities will be used unsupervised by an adult parent or guardian.</p> <p>As such, the requirement for NEAPs is that they should either be overlooked by family homes to provide informal surveillance based on the appropriate buffer zone requirement, or, located in "busy" areas where there is considerable natural surveillance and footfall throughout daylight hours.</p>

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
4.36				

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22137 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the 50:50 split of children's play space between formal and informal proposed in this paragraph is impractical. There is no justification in national policy guidelines for the insistence on 50% of equipped play space. Furthermore this requirement is inconsistent with the Northstowe AAP at paragraph 10.11 which requires that 'up to 50%' [of children's play areas] will be in the form of LAPs, LEAPs, NEAPs and SIPs. When the walk time accessibility standard and the minimum size standard are combined with a requirement for equipped play space of 0.4ha per 1000 population, the quantity of play space can be demonstrated to be excessive and unreasonable.	Therefore English Partnerships/ Gallagher strongly recommend that the last sentence of this paragraph is deleted.	<p>It is the role of this SPD to provide guidance on how the adopted LDF policies should be implemented. It is entirely appropriate to provide guidance on the form the 0.8 hectares of children's playspace should take. The Council's 'Recreation Study - Audit and Assessment of Need for Outdoor Playspace and Informal Open Space in South Cambridgeshire June 2005' (subject to public consultation in November 2004) paragraph 3.39 states, 'This significant shortfall in Formal Children's Playspace, when combined with the accessibility problems outlined above, suggest that it would be sensible to establish a high standard for the provision of Formal Children's Playspace in new developments. The higher figure of 0.8 hectares per 1,000 population is therefore selected. A split between formal and informal should also be maintained at 50% each where appropriate.'</p> <p>The 50/50 split of formal and informal playspace is considered an appropriate starting point for considering the wide range of new developments that will be considered using this SPD, in a situation where provision across the district is relatively poor compared to the LAPS / LEAPS / NEAPS model. It provides a clear point for developing a contributions model for off site provision.</p> <p>It is acknowledged that 50% may not be required to meet the needs of a new major development, and this is reflected in the Area Action Plan policy. With regard to onsite provision more generally, it is also acknowledged that there may be cases where provision of the playspace hierarchy can be achieved with less than 50% of the play space being of the formal variety. A change to the SPD is proposed to reflect this point.</p>	Delete paragraph 4.36.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>4.37</b>					
22138 - English Partnerships and Gallagher Longstanton Limited	Object	A wider buffer zone for skateparks and informal MUGAs follows the guidance in the NPFA Six Acre Standard for a minimum of 30m, although a greater distance may be needed where purpose-built skateboarding facilities are provided. Nevertheless English Partnerships/ Gallagher believe that to stipulate a specific distance (80-100m) for informal MUGAs is too restrictive, particularly in urban locations, such as a town parks. No such requirement is placed on formal MUGAs. It is noted at Northstowe, the Council is seeking to locate formal MUGAs at community centres in the heart of residential areas.	Therefore English Partnerships/ Gallagher recommend that the table at Paragraph 4.37 is revised by deleting the reference to informal MUGA's in row 5 column 5 of the table. Furthermore we request that the end of the 'Distance' footnote to the Table in paragraph 4.37 be amended by adding after "busy roads or junctions" except where defined safe crossing points are provided. This will be the case in particular in urban areas where there are also likely to be speed restrictions."	The recommendation of 80 -100m buffer is from SCDC Environmental Health team relating to informal MUGA's or Ball Courts (basketball etc). This is a recommendation based on rural areas where background noise levels are low. The SPD should be revised to say that this is the recommended buffer zone distance for skate parks and informal MUGA's or Ball Courts in the villages of South Cambs. It is acknowledged that such facilities in more urban areas, may not require the same buffer zone.  It is acknowledged that in urban areas there may be a need to cross busy roads, but it should only be considered appropriate for Neap's, and only where safe footpaths and crossing points are provided at the same time. The aim should remain to provide spaces where there is no need to cross a busy road ensuring child safety and maximizing the opportunities for children and young people to access play facilities without adult supervision.	Amend paragraph 4.37:  Amend table referring to NEAP: "80m -100m for skate parks and informal MUGA's (for rural areas)." Add to end of the paragraph referring to distance: "The only exception to this may be for NEAP's, where defined safe crossing points are provided at the same time."
<b>4.46</b>					
22187 - Cambridge Preservation Society	Object	Add that play areas should not be provided on split sites and not divided by a busy road or cycleway etc to ensure safer design solutions.		The issue is noted, but the SPD establishes the need for a network of safe play spaces. References to play spaces split by busy roads is not necessary.	No change.
22188 - Cambridge Preservation Society	Object	Benches / seating - consider antisocial behaviour and improve description of bench design; also play areas should have a degree of sunlight and also some shade.		Play areas and shade is addressed by 4.46. The words "robust and low maintenance" be added to description of benches.	Amend 1st bullet of 4.46:  Robust and low maintenance benches with arm and back rests to aid older or less mobile carers;

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22139 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher consider this paragraph to be too prescriptive. It contradicts the sentiment in paragraph 4.44 of the SPD that the "LPA will encourage the provision of innovative approaches to play facilities"; and it is unnecessary given the requirements of paragraphs 4.47 and 4.48. English Partnerships/ Gallagher recommend that paragraph 4.46 is deleted.	English Partnerships/ Gallagher recommend that paragraph 4.46 is deleted.	Disagree. The purpose of the guidance is to clarify what SCDC expects to see on new play spaces. This has the benefit of establishing expectations from the outset. It would weaken the SPD if guidance was not provided.	Amend 1st sentence of 4.46 to read: "All play areas will be expected to provide each of the following unless clear evidence is produced to demonstrate why any particular facility or item should be omitted:"
<b>4.47</b>					
22189 - Cambridge Preservation Society	Object	Add also reference for safer surfacing to relevant BS.		EN1177 relates to safety surfacing. The SPD has been revised to clarify.	Revise paragraph 4.47 to read : "All play equipment must meet the most recent and relevant BS and EN standards including BS EN 1176 for playground and equipment design and installation and BS EN 1177 for impact attenuating surface testing and performance plus any further BS EN amendments and subsequent standards."
<b>4.49</b>					
22191 - Cambridge Preservation Society	Object	Paras 4.49 to 4.77 - add that play areas for all ages should have natural surveillance and a good degree of overlooking to prevent / reduce anti-social behaviour; play areas should be integral to development and village centres etc not positioned at most furthest edge to most of the new and nearby existing communities.		The point is noted, but is adequately addressed by paragraph 1.4 of the SPD.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>4.50</b>					
22140 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that the words "On such developments, it is anticipated that Design Codes will provide the framework for a coordinated approach to the design and delivery of LAPs" be added to the end of this paragraph.	English Partnerships/ Gallagher recommend that the words "On such developments, it is anticipated that Design Codes will provide the framework for a coordinated approach to the design and delivery of LAPs" be added to the end of this paragraph.	Agreed.	Add the following to the end of paragraph 4.50: "On large developments, Design Codes can provide the framework for a coordinated approach to the design and delivery of LAPs."
22190 - Cambridge Preservation Society	Object	Add to "planting and natural features" also "the provision of tactile features (such as boulders etc)"; all fencing should be sturdy and long-lived.		It is agreed that LAPs could include tactile features, and this should be referenced in the paragraph.	Amend third sentence of paragraph 4.50:  "Rather they will use landscaping, planting and natural features and will offer a variety of paved and grass surfaces and tactile features."
<b>4.72</b>					
22141 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that the following text is added to the end of the first bullet point in this paragraph "except where defined safe crossing points are provided. This will be the case in particular in urban areas where there are also likely to be speed restrictions"	English Partnerships/ Gallagher recommend that the following text is added to the end of the first bullet point in this paragraph "except where defined safe crossing points are provided. This will be the case in particular in urban areas where there are also likely to be speed restrictions"	It is acknowledged that in urban areas there may be a need to cross busy roads to get to some high order facilities, but it should not be appropriate for informal playspace. Such playspaces should be provided in housing areas to avoid the need for children to cross busy roads. This is appropriately reflected in paragraph 4.72 of the SPD.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>4.74</b>					
22080 - Natural England	Object	<p>We recommend that this section makes reference to the aims of the Cambridgeshire Horizons Green Infrastructure Strategy, the requirements for informal open space identified within PPG 17 and Natural England's Accessible Natural Greenspace Standards (ANGSt). The ANGSt standards provide a set of benchmarks for ensuring access to places of wildlife interest. These standards recommend that people living in towns and cities should have:</p> <ul style="list-style-type: none"> <li>* an accessible natural greenspace less than 300 metres (5 minutes walk) from home;</li> <li>* statutory Local Nature Reserves at a minimum level of one hectare per thousand population;</li> <li>* at least one accessible 20 hectare site within two kilometres of home; one accessible 100 hectare site within five kilometres of home; and one accessible 500 hectare site within ten kilometres of home.</li> </ul>	<p>We recommend that this section makes reference to the aims of the Cambridgeshire Horizons Green Infrastructure Strategy, the requirements for informal open space identified within PPG 17 and Natural England's Accessible Natural Greenspace Standards (ANGSt).</p>	<p>The SPD provides guidance on how the open space standards in the adopted Development Control Policies DPD should be implemented, and this section addresses the informal open space element of the policy. It would not be sound to add references to an alternative standard through this SPD.</p>	No change.
<b>4.78</b>					
22079 - Natural England	Support	We strongly support the requirement identified in paragraphs 4.74 to 4.77 for the provision of informal open space within new development.		Support noted.	No change.
22153 - Cambridgeshire County Council	Object	The Green Infrastructure Strategy should be referenced as technical guidance, as this shows the main green corridors that Northstowe and the urban extensions should be helping develop.		<p>It is agreed that links to the Green Infrastructure Strategy could be highlighted.</p>	<p>Add to end of paragraph 4.78: "They will help support the vision of the Cambridgeshire Green Infrastructure Strategy to create a comprehensive and sustainable network of green corridors."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22081 - Natural England	Object	Paragraphs 4.78 and 4.79 are disappointing and again should make reference to the Cambridgeshire Green Infrastructure Strategy. These sections could also set out in more detail the multi-functional value of green corridors and their huge potential benefit to wildlife, even on a small scale. However, it would be prudent within these paragraphs to highlight the importance of the quality (in addition to quantity) of green space provision and the need for appropriate maintenance in order to optimise those multi-functional benefits. A network of green corridors can also provide a valuable link between town and country; a useful publication and reference to this is The Countryside In and Around Towns: A vision for connecting towns and country in the pursuit of sustainable development (CA 207).	Paragraphs 4.78 and 4.79 are disappointing and again should make reference to the Cambridgeshire Green Infrastructure Strategy.	Issues raised in the representation go beyond implementation of the open space standards provided by SF/10 and SF/11 of the Development Control Policies DPD. Issues will also be addressed by the Landscape SPD, the Biodiversity SPD, and the District Design Guide.	Add to end of 4.78: "They will help support the vision of the Cambridgeshire Green Infrastructure Strategy to create a comprehensive and sustainable network of green corridors."
22151 - Cambridgeshire County Council	Support	<p>It is not unusual for public rights of way to cross open space. Where they do, land use proposals must prevent conflict; e.g. do not allow football pitches to be marked out over the line of a path.</p> <p>It should be born in mind that the requirements and options differ between footpaths and bridleways on the one hand and byways on the other. Apart from other things, the latter carry vehicular rights and adjustments can only be made thorough the magistrates' court.</p>		<p>The issue regarding public rights of way is noted, and a change to the SPD is suggested.</p>	<p>Add to end of paragraph 4.15:</p> <p>"It is not unusual for public rights of way to cross open space. When locating sports pitches, consideration should be given to preventing conflicts."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
4.82					
22083 - Natural England	Object	The provision of insufficient greenspace can encourage car use and have direct impacts on biodiversity. We feel it is important to highlight, within the main body of this SPD, the need to provide sufficient accessible Greenspace to prevent inappropriate or over-capacity use of existing sites such as those designated for nature conservation.		The point raised is noted, but the purpose of the SPD is to provide guidance on the implementation of the existing open space policies.	No change.
22154 - Cambridgeshire County Council	Object	There is an incorrect reference to the Biodiversity Checklist / Action Plan. The Cambridgeshire & Peterborough Biodiversity Partnership, not Cambridgeshire County Council, produced this.		Agree.	Amend 3rd sentence of 4.82 to read:  "Further guidance can be found in the Biodiversity checklist / Action Plan produced by Cambridgeshire & Peterborough Biodiversity Partnership."
22082 - Natural England	Support	Natural England supports the message in paragraph 4.82 that "It is vital that open space provision, as part of the landscape scheme, maximises the biodiversity of the site by the inclusion of native species and the creation and retention of a variety of habitats." Reference might also be made here to the following web link: A space for nature <a href="http://www.english-nature.org.uk/special/greenspace/">www.english-nature.org.uk/special/greenspace/</a>		Support noted. The web link refers back to English Nature recommended standards, which are not the subject of this SPD.	No change.

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b>Appendix 3 - Definitions</b>					
<i>Outdoor Play Space</i>					
22142 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships/ Gallagher believe that the 50:50 split of children's play space between formal and informal proposed in this appendix (under b. Children's Play Space) is impractical. There is no justification in national policy guidelines for the insistence on 50% of equipped play space. Furthermore this requirement is inconsistent with the Northstowe AAP at paragraph 10.11 which requires that 'up to 50%' [of children's play areas] will be in the form of LAPs, LEAPs, NEAPs and SIPs. When the walk time accessibility standard and the minimum size standard for LAPs, LEAPs and NEAPs are combined with a requirement for equipped play space of 0.4ha per 1000 population, the quantity of play space can be demonstrated to be excessive and unreasonable.</p>	<p>Therefore English Partnerships/ Gallagher strongly recommend that the last sentence of the definition of Children's Play Space at b) of this Appendix is deleted.</p>	<p>It is the role of this SPD to provide guidance on how the adopted LDF policies should be implemented. It is entirely appropriate to provide guidance on the form the 0.8 hectares of children's playspace should take.</p> <p>The 50/50 split of formal and informal playspace is considered an appropriate starting point for considering the wide range of new developments that will be considered using this SPD, in a situation where provision across the district is relatively poor compared to the LAPS / LEAPS / NEAPS model. It provides a clear point for developing a contributions model for off site provision. 'The Development of a Recreation Policy for South Cambridgeshire District Council' background document used model to calculate the split between the different types of provision in order to calculate costs, rather than advocate a specific geographical distribution of the different types of play spaces. Used for this purpose the document is sound.</p> <p>It is acknowledged that 50% may not be required to meet the needs of a new major development, and this is reflected in the Area Action Plan policy. In this case the AAP policy clearly takes precedence over the district wide guidance in this SPD. With regard to onsite provision more generally, it is acknowledged that there may be cases where provision of the playspace hierarchy can be achieved with less than 50% of the play space being of the formal variety. A change to the SPD is proposed to reflect this point.</p>	<p>Amend Appendix 3 definition of outdoor playspace to read:</p> <p>"Children's Play Space - Designated areas for outdoor play for children and young people. This will contain a range of facilities and an environment that has been designed to provide focused opportunities for outdoor play. This includes formal equipped play areas and provision for teenagers including wheeled sports parks and macadam kick-about areas. It also includes areas for informal play, including grass kick-about areas within housing developments."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>Informal Open Space</b>					
22192 - Cambridge Preservation Society	Object	Definition: Informal Open Space - should not include any odd unusable green patches.		The intention is agreed, but it is considered that the SPD includes sufficient guidance on the quality requirements of open spaces.	No change.

Areas that will not be considered

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>Appendix 4 - Definitions : Areas and Facilities That Do Not Contribute Towards Open Space Standards</b>					
<i>Areas that will not be considered</i>					
22152 - Cambridgeshire County Council	Object	There has been discussion, relating to Northstowe and elsewhere, on whether the area covered by public rights of way should be subtracted from the open space area figure when calculating required provision. It is suggested that where usage does not conflict this is not necessary. This position is taken, at least in part, to avoid the possibility of an offer of a new bridle route, for example, being withdrawn to maintain open space to house number ratio.		The SPD is clear that land used for roadside verges and other small or narrow incidental areas of land should not be included in the standard. Where the primary focus of a very linear corridor of land is a movement corridor, the same principle should apply.	No change.
22143 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher are concerned that 'Greenways' are not defined in this SPD and as a consequence there is the potential for confusion between 'Greenways' as described in this Appendix and 'Green Corridors' as described at paragraph 4.78. In circumstances set out in paragraph 4.78 and 4.79 the whole of the Greenway would count toward the open space standard, even though the footpath or cycleway could be described as a green corridor. Further, national guidance (PPG17 - Annex paragraph 2) identifies green corridors as "open spaces that may be of public value" and therefore it is not in accordance with the advice of PPG 17 to exclude green corridors or green ways from contributing towards Open Space Standards.	English Partnerships/ Gallagher therefore recommend that Bullet Point 6 of the Definition - Land Used for Greenways is deleted from this Appendix.	Disagree. Where a site provides an informal open space function, it can be included. This may be the case with a green corridor, where a wider area of land is included which performs an informal open space function.  The definition of a greenway highlighted in this appendix is intended to highlight that where land takes the form of a landscaped path, it should not be included. It is only where a useable informal open space is provided as part of that corridor should it be included. A Green Corridor is a larger area of land that performs a wider function. A change is proposed to clarify the distinction.	Amend 6th Bullet to read:  "Land used for Greenways (off highway landscaped paths), since their principal purpose is that of a movement corridor. This is distinct from a Green Corridor, which comprises open land, which penetrates into an urban area for amenity and recreation. The only exception to this is that part of a Greenway that passes through an area that is designated in its own right as informal open space."

Areas that will not be considered

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22147 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that this definition is not sufficiently precise to distinguish such areas from open space areas with multi functional use. Informal areas of open space can be multi functional, providing a facility for recreation as well as for nature conservation (see NAAP paragraph D11.2) and should reasonably count toward the public open space standard. Paragraph 4.82 of the SPD provides further support for the notion of multi use of open space. Therefore multi functional areas should count toward open space standards.	Therefore English Partnerships/ Gallagher recommended that a clearer and narrower definition is provided for ecology areas which do not contribute to open space standards.	Where public access to an area is discouraged it is entirely reasonable not to count it towards the open space standards provided by policy SF/11, as it will not meet the definitions provided in the notes to the policy.  Multifunctional sites may include specific areas which benefit ecology, but they will still be able to meet the definition provided by note 3 of policy SF/11, as they are designed for use by people.	No change.  A change to the SPD is not necessary.
22145 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the exclusion of allotments is inconsistent with PPG17, where 'allotments' are included in the typology of open space uses defined in the annex (paragraph 2 vii). Using Northstowe as an example the technical case that the allotments at Northstowe should be counted as part of the provision of informal open space is as follows: PPG 17 includes a definition of open space which expands the definition contained in the Town & Country Planning Act 1990 where it is defined as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground.	English Partnerships/ Gallagher therefore recommend that Bullet Point 13 of the Definition - Allotments is deleted from this Appendix.	Disagree. Allotments are not included within the standard defined in policy SF/11 and addressed by the SPD. They were not included in the audit that lead to the open space standards, as detailed in paragraph 2.24 of the South Cambridgeshire Recreation Study, they are therefore an additional community facility.  Allotments are a community facility that will be sought separately under the terms of Development Control Policies DPD policy DP/4. This was highlighted by the inclusion of allotments in the list of community facilities included in the Submission Northstowe AAP, although the entire list was deleted as a result of the Examination. The loss of this list form the plan does not change the general approach to allotments.	No change.

Areas that will not be considered

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22146 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that "Water bodies" should not be excluded as contributors toward informal public open space as this would be in conflict with national guidance (PPG17 - paragraph 1 of the Annex). Furthermore with respect to Northstowe, the Northstowe Area Action Plan acknowledges at paragraph D11.2 that a "water park will also allow the creation of a diverse environment to provide both a visual and recreation (our emphasis) amenity for the residents of the new town and surrounding villages as well as opportunities for biodiversity." It is accepted that in the absence of sports facilities, water bodies may not be counted as outdoor sports facilities.	English Partnerships/ Gallagher therefore recommend that Bullet Point 14 of the Definition - Water Bodies is deleted from this Appendix.	In many cases the primary function of a water bodies is drainage, and the recreation function is limited. Water bodies would be land intensive but not provide a function that met the requirements of the policy defined in policy SF/11. Water bodies should only be counted where they provide an interactive feature that enables formal sports activities.	No change.
22144 - English Partnerships and Gallagher Longstanton Limited	Object	Car Parking areas have been included in Appendix 4 as non contributors to outdoor play space standards. If this is the intention then English Partnerships/ Gallagher believe that in the context of a sustainable new community such as Northstowe, it is incongruous to propose a policy that disadvantages car parks that serve a dual purpose, for example as a shopper's car park combined with a facility for users of a sports hub. For instance if a car park exclusively for the use of the sports hub counts as a contributor to public open space, a shared car park should have some open space value.	English Partnerships/ Gallagher therefore recommend that Bullet Point 10 of the Definition - Car Parking Areas is revised to state "car parking areas that are not to serve an open space use".	The benefits of dual use of parking are acknowledged. However, the danger is that a large car park serving a wider function that also benefits an open space, could be included as counting towards the standard if the wording suggested by the objector was utilised. The scale of such a car park could go significantly beyond what would be required to serve an open space, and as a result reduce the amount of land actually provided for open space uses.  It is agreed that the first sentence of Appendix 4 should be reworded.	Amend first sentence of Appendix 4:  "The following are areas that will not be considered as contributing to the open space quantitative standard."
22176 - Great Shelford Parish Council	Support	We are very pleased that sundry small areas of land are no longer to be included in the open space total. This will ensure open space is usable and not just an amalgam of roadside verges.		Support noted.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>Appendix 5 - Further Information</b>					
<i>Local Information</i>					
22155 - Cambridgeshire County Council	Object	A reference to the Green Infrastructure Strategy, Biodiversity Checklist / Action Plan and SCDC Biodiversity Strategy should be added.	Agreed.		Appendix 5 - Add reference to the Green Infrastructure Strategy, Biodiversity Checklist / Action Plan and SCDC Biodiversity Strategy.

## **Appendix 7 - Section 106 Template**

### *The Template*

22148 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that it should be made clear in this Appendix that provides a Template for s.106 Agreement, that this template can only be indicative. Each s.106 agreement will be specific to the development, especially in the case of major new developments such as Northstowe.	Circular 05/2005 states, 'Local planning authorities are encouraged to use and publish standard heads of terms, agreements / undertakings or model clauses wherever possible in the interest of speed.' The template provided in appendix 7 is intended to reflect this purpose. However, it is agreed that complex applications and situations may require deviations from this standard template. A change has been proposed to paragraph 3.2 in response to a previous representation.	No change.
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# ***Public Art Supplementary Planning Document***

## ***Public Participation Report***

Chapter 1 - Introduction to the Supplementary Planning Document

1.1

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b><i>Chapter 1 - Introduction to the Supplementary Planning Document</i></b>					
<b>1.1</b>					
22043	Support	In support of Public Art Guidance. Demonstrates an integral, strategic approach to public art: to encourage the commission of public art, thus prior to artwork commission; as part of the planning and development process.		Support noted.	No change.
22047	Support	The document provides a good framework in terms of overall approaches to public art and detailed stages and procedures for implementation as an integral part of the planning process		Support noted.	No change.
22221 - East of England Regional Assembly	Support	The Regional Planning Panel Standing Committee considered the attached report at the meeting of 27th June 2008 and endorsed the recommendation that: 'The four draft Supplementary Planning Documents prepared by South Cambridgeshire District Council are in general conformity with the RSS.'		Support noted.	No change.
22084 - Natural England	Support	Natural England welcomes the production of this SPD; public art can make a valuable contribution to the appreciation, and indeed conservation, of the natural environment.		Support noted.	No change.
22042 - Cambourne Arts	Support	We generally support the document.		Support noted.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>1.2</b>					
22214 - Marshall of Cambridge (Holdings) Limited	Object	In defining or explaining public art I would suggest that references should be made to issues such as promoting a sense of pleasure, being pleasing, perhaps being evocative of history, being inspiring and / or thought provoking. The contents of the current paragraph are not easy to comprehend.		Agree to amend the definition of Public Art to more reflect what is meant by the term in South Cambridgeshire.	The wording of paragraph 1.2 should be amended to read: "The term Public Art refers to works of art in any media which contributes to the identity, understanding, appreciation, and enhancement of public places. Public Art can promote a sense of place and pleasure for example by evoking local history, be inspiring and / or thought provoking. In South Cambridgeshire Public Art has a role to play in neighbourhood and community development."
<b>1.3</b>					
22159 - Cambridgeshire County Council	Support	In general support, based on the understanding that Policy SF/6 in the Development Control Policies DPD adopted July 2007 is one of encouragement, and is voluntary rather than an a requirement.		Support noted	No change.
<b>1.6</b>					
22215 - Marshall of Cambridge (Holdings) Limited	Object	In the fourth bullet point there is reference to such a maintenance of art works. Any such reference needs to point to the context set by the advice in Circular 05/2005.		The bullet point is to be amended to clarify its meaning.	The wording of the fourth bullet of paragraph 1.6 be amended to read as follows: "Where Public Art is secured, proposals include costed maintenance schedules to ensure continuing community benefit."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>1.8</b>					
22060 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships / Gallagher recommend that references to text contained in PPS1 and PPS3 should be more accurately quoted by providing specific quotes with the paragraphs of the PPS referenced. These paragraphs need to differentiate between the actual text in the PPS and South Cambridgeshire District Council's objectives for Public Art. For example as currently drafted paragraph 1.9 could be interpreted as stating that PPS1 refers to "the inclusion of public art in a scheme could assist the involvement of the community and help in creating vision". In fact there are no specific references to public art within PPS1.		To ensure that there is differentiation between the actual text in PPS3 and South Cambridgeshire District Council's objectives for Public Art specific extracts from PPS3 will be included in paragraph 1.8. The wording of the paragraph will be revised to clarify that it is South Cambridgeshire's opinion that Public Art can assist in creating a distinctive character.	The wording of paragraph 1.8 will be revised to read as follows: "At a national level Planning Policy Statement 3: Housing (PPS3) states that "...Good design is fundamental to the development of high quality new housing, which contributes to the creation of sustainable, mixed communities." (paragraph 12). PPS3 also proposes that Local Planning Authorities should aim at "...Creating places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character." (paragraph 14). South Cambridgeshire District Council considers that the inclusion of Public Art within new developments will assist in creating this distinctive nature."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>1.9</b>					
22061 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships / Gallagher recommend that references to text contained in PPS1 and PPS3 should be more accurately quoted by providing specific quotes with the paragraphs of the PPS referenced. These paragraphs need to differentiate between the actual text in the PPS and South Cambridgeshire District Council's objectives for Public Art. For example as currently drafted paragraph 1.9 could be interpreted as stating that PPS1 refers to "the inclusion of public art in a scheme could assist the involvement of the community and help in creating vision". In fact there are no specific references to public art within PPS1.		To differentiate between the actual text in PPS1 and South Cambridgeshire District Council's objectives for Public Art, paragraph 1.9 will be amended to include specific quotes from PPS1. It will be made clear that the value of including Public Art is in the opinion of South Cambridgeshire District Council.	The wording of paragraph 1.9 will be amended to read as follows: "Planning Policy Statement 1: Delivering Sustainable Development states that 'Community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities. In developing the vision for their areas, planning authorities should ensure that communities are able to contribute to ideas about how that vision can be achieved, have the opportunity to participate in the process of drawing up the vision, strategy and specific plan policies, and to be involved in development proposals.' (Key Principle (vi) paragraph 13). South Cambridgeshire District Council believe that the inclusion of Public Art in a scheme should assist the involvement of the community and help in creating and delivering a shared vision as well as supporting community development and cohesion."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>1.12</b>					
22085 - Natural England	Support	We support paragraph 1.15 which identifies the benefits of public art.	Suggest that the second bullet is amended thus: * Create unique images that, as symbols, can be used to promote places, generating pride of place and a sense of local identity and distinctiveness.	Support noted and second bullet point in paragraph 1.12 is to be amended.	Amend second bullet point in paragraph 1.12 to read as follows: "Create unique images that, as symbols, can be used to promote places, generating pride of place and a sense of local identity and distinctiveness."
<b>1.14</b>					
22063 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships / Gallagher are concerned that the reference to the policy requirement of the Northstowe Area Action Plan (NAAP) is incorrect. Policy NS/9(9) of the NAAP refers to "a strategy for public art..." and not to a "Public Art Plan". The same words are contained in paragraph D5.14 of the NAAP. The SPD should be amended to be consistent with the NAAP and any other Area Action Plans through reference to "a Public Art Strategy". As currently drafted this paragraph would be in conflict with DPD policy and therefore would not be in accordance with the requirements of an SPD as set out at section 19 of the Planning and Compulsory Purchase Act (2004).		The wording in paragraph 1.14 to be amended to reflect the policy wording included in the Area Action Plans. Where the term 'Public Art Plans' is mentioned this should be replaced with 'Public Art Strategy'. An additional sentence is to be include to clarify the meaning of 'plan' and 'strategy' in the SPD.	In the first sentence of paragraph 1.14 'Public Art Plans' should be replaced by 'Public Art Strategies'. After this first sentence the following words are to be added: "For clarity in this document the terms 'Public Art Plan' and 'Public Art Strategy' are interchangeable."

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
1.15				

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22031 - James A Quinlan & Associates Limited	Object	Make clear that policy is to encourage and that there can be no compulsion on developers to provide public art.		<p>Policy SF/6 in the Development Control Policies DPD, as replicated in paragraph 1.15, clearly states at paragraphs 1 and 3 that the district council will encourage Public Art. It will be one of a number of considerations as part of the planning approval process.</p> <p>In order to ensure that the SPD is absolutely clear on this emphasis of encouragement rather than implying compulsion the wording throughout the whole SPD has been reviewed and amended accordingly.</p>	<p>The following amendments have been made to the SPD:</p> <p>Amend paragraph 1.4 by deleting the last sentence and adding the following wording: "The Council is aware of the competing demands made upon developers for funding for infrastructure relating to development schemes and will take these viability considerations into account when discussing with developers the nature/scale of the Public Art element that could be included in any development scheme."</p> <p>Amend first bullet in paragraph 1.6 to read: "To promote the benefits of Public Art in new developments where appropriate, in order to enhance the built or natural environment and the quality of life of residents and visitors."</p> <p>Amend second bullet in paragraph 1.6 to read: "Provide practical guidance to developers about how Public Art can be included when a planning application is submitted particularly how it should be referenced / incorporated within Design and Access statements."</p> <p>Amend third bullet in paragraph 1.6 to read: "Assist applicants for planning permission by informing them about what contributions may be encouraged and why and how provision and payments could be made."</p> <p>Insert a new bullet after the third bullet in paragraph 1.6 to read: "To ensure that local communities are</p>

<b>Representation No.</b>	<b>Nature Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
			fully engaged in decisions on Public Art provision in local developments."	
			Replace paragraph 1.14 with the following: "Four of the areas where growth is planned have Area Action Plans, which form part of the LDF, and because of the scale of development proposed within these Plans there are policies that Public Art Strategies should be prepared. For clarity in this document the terms 'Public Art Plan' and 'Public Art Strategy' are interchangeable. The provision of Public Art in these growth areas will help to provide a sense of place and distinctiveness."	
			Amend paragraph 2.1 to read: "South Cambridgeshire District Council takes a broad view of Public Art, being a process of improving the quality of development and / or assisting community development. This may include the involvement of recognised artists."	
			Add after the word 'landmarks' in the first bullet in paragraph 2.2 the following words: " ...(including artworks incorporated into landmark buildings);..."	
			Add the following text to the end of 2.2: "Permanent works should be durable and good quality construction requiring very little if any maintenance;"	
			Delete paragraph 3.1.	
			Amend paragraph 3.2 to read: "South Cambridgeshire Council will normally encourage developers to dedicate between 1% and 5% of the	

<b>Representation No.</b>	<b>Nature Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
			<p>associated construction costs of the capital project to Public Art. The level of contribution from the developer is likely to be determined by the scale of the development with larger schemes with high service and infrastructure costs being the most likely to contribute the lowest percentage cost toward Public Art. For a number of the very large scale developments within South Cambridgeshire where development costs will run into the hundreds of millions of pounds and which will have to bear very high costs of services, facilities and infrastructure, the contribution to Public Art provisions is likely to be less than 1% of the total development value."</p>	<p>Add the following wording to the last sentence of paragraph 3.3: "...whichever is most appropriate given the scale and location of the development."</p>
			<p>Amend paragraph 3.4 to read as follows: "If a developer is willing to incorporate Public Art within a scheme the Council will include this when they negotiate a legal agreement (referred to as a section 106 agreement) with the developers and their agents to ensure that the Public Art is well provided and measures are provided to ensure that it is maintained and remains an asset to the development. Such an agreement can cover all the different elements of the necessary infrastructure requirements and for Public Art this could contain the details of the nature and extent of the Public Art contribution and any sums involved."</p>	<p>Delete paragraph 3.5.</p>

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
			Amend paragraph 3.7 to read as follows: "Where a developer is willing to make a contribution to Public Art but is unable to prepare a Public Art Plan or achieve an appropriate scheme on site, the Council will encourage developers to make financial contributions to support Public Art initiatives in suitably prominent locations nearby where artworks would contribute to local character and thereby enhance the neighbourhood of the development or as part of other plans adopted and promoted by South Cambridgeshire District Council."	
			Amend the second sentence of paragraph 3.8 to read as follows: "The costs could be applied to either one or proportionately to a number of developments in the vicinity."	
			Amend the first sentence in paragraph 4.1 to read: "Policy SF/6 in the Development Control Policies DPD encourages the provision and commissioning of Public Art and indicates that it would apply to the following schemes:"	
			Amend paragraph 4.6 to read as follows: "Where a developer has decided to include Public Art in a scheme a Public Art Plan will need to be prepared as part of the development process. The nature of the Public Art Plan will depend on the scale of the development."	
			Amend bullet 1 of paragraph 4.7 to read: "A brief for the involvement of the artists where Public Art is not already	

<b>Representation No.</b>	<b>Nature Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
			included in the architecture or landscaping of the scheme."	
			Replace the word "intrinsic" in the second bullet in paragraph 4.7 with "already included"	
			Amend bullet 5 of paragraph 4.7 to read: "Details for future care and future maintenance. Permanent works should be durable and good quality construction requiring very little if any maintenance."	
			Amend the second sentence of paragraph 4.11 to read: "It is more effective to incorporate Public Art in the earliest thinking of a development proposal."	
			Flow Chart Box 1 - amend the text to read: "Pre - Application Discussions and Consultations. Developer contacts the District Council Development Control Section. If the scheme is of a scale that falls under the scope of the Council's Public Art policy the Development Control Officer will provide the developer with this SPD. The Officer will encourage the developer to consult the local community and prepare an integrated Public Art plan as part of other contributions supporting services, facilities and infrastructure."	
			Flow Chart Box 2 - remove contact telephone number.	
			Flow Chart Box 4 - replace "always" with "often" in the second paragraph.	
			Flow Chart Box 5 - add the following text to the end:	

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			"Where off-site provision is contemplated the Arts Development Officer will seek early discussions with the local Parish Council to ascertain whether off-site provision would be supported."	Flow Chart Box 6 - amend the first sentence to read: "Unless the developer employs an in-house specialist, consideration should be given to engaging an artist or artists to form part of the design team. Advice on this recruitment process is given in this SPD."
				Flow Chart Box 9 - amend the first sentence to read: "The artist and / or the developer consults with the local community regarding the purpose and nature of the Public Art scheme."
				Flow Chart Box 10 - add the following text to the beginning of the first sentence: "Where appointed..."
				Flow Chart Box 18 - amend the first sentence to read: "The Public Art Plan is recommended (or declined) by the Arts Development Officer following consultation with the Development Control Officer."
				Amend the heading before paragraph 5.1 to read: "The Role of an Artist"
				Amend paragraph 5.1 to read as follows: "The defining quality of Public Art is the artist's intent and the connection that this intent has with the place that art works are located as well as the viewers or audience."

<b>Representation No.</b>	<b>Nature Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
			<p>Delete the second sentence of paragraph 5.2 and replace with the following:</p> <p>"It may not be necessary to appoint a recognised artist but an artist will often have the necessary skills to successfully take a Public Art project from inception to realisation. Where appointed, the artist should be involved in the creation of development proposals as a member of the design team and will be expected to develop their work in collaboration with the local community and users of the public building or site. Artists should always have due regard to health and safety issues in respect of the art works."</p>	<p>Amend paragraph 5.3 to read as follows:</p> <p>"The main roles that artists can have include working:</p> <ul style="list-style-type: none"> <li>1) Alongside local people and involving residents in exploring the ideas, development and realisation of permanent or temporary art works or arts projects in the community.</li> <li>2) As members of design teams and with architects to enhance aesthetic aspects of the development.</li> <li>3) As researchers and curators, drawing on for example views expressed in Parish Plans, the local history of a place and its surroundings or its proposed future use in order to inform the art works."</li> </ul> <p>Amend paragraph 5.4 to read as follows:</p> <p>"All artwork commissioned by a developer should be of a high quality and represent good value for money."</p>

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			Amend the second sentence of paragraph 5.5 to read as follows: "The artist's brief should be communicated at the earliest stage."	
			Amend the heading before paragraph 5.6 to read: "Recruitment of an Artist"	
			Amend the first sentence of paragraph 5.6 to read as follows: "Where the decision is made to appoint an artist, their selection should be made against clear criteria based on the objectives of the commission."	
			Amend the heading before paragraph 5.11 to read: "The Public Art Brief"	
			Amend paragraph 5.11 to read: "The Public Art brief clarifies precisely the kind of artwork and therefore artist required for the particular development."	
			Delete the final sentence of paragraph 5.13.	
			Amend paragraph 5.14 to read as follows: "A good degree of Public Art expertise is essential and developers should engage consultants with the skills, knowledge and capacity required to support the Public Art process and have regard to their advice."	
			Add a new sentence after the first sentence in paragraph 5.24 to read: "South Cambridgeshire District Council wants to involve communities in decisions whether Public Art should be provided and in the development of Public Art proposals."	

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22202 - Cambridge Preservation Society	Object	2b - add hospital grounds and similar to the list.		The suggested amendment is to the wording of the policy that is contained in the Development Control Policies DPD adopted by South Cambridgeshire District Council in July 2007. As adopted policy it is not possible to amend the wording. Paragraph 2b lists some non-residential developments that are included but the list is not exhaustive, and the fundamental issue is whether a development meets the size threshold. Therefore, although the policy does not explicitly mention hospitals this type of development is not excluded if it is over 1000m <sup>2</sup> .	No change.

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
2.2	<i>Chapter 2 - What is Public Art</i>			

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22064 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships / Gallagher believe that it is a mistake to try to define the specific types of projects that are recognised as public art as trying to define public art too narrowly will constrain creativity and originality of approach, which SCDC should be seeking to encourage through the SPD.</p> <p>English Partnerships / Gallagher would therefore recommend that there is no definition of public art and the paragraph is deleted.</p> <p>If a definition is to be retained then it will need to be broadened and be less specific through reference to two broad categories of public art.</p>	<p>If a definition is to be retained then it will need to be broadened and be less specific through reference to two broad categories of public art, as follows:</p> <p>a) Art Integrated into Physical Form and Function. Projects that have a physical, permanent outcome integrated into the form, function, style or content of a place, space or building. These will range from projects where an artist has participated in the design or masterplanning of buildings, townscapes or landscapes to the design and making of individual physical elements within them.</p> <p>b) Arts activities A programme of projects that will range from creative consultation to festivals, ephemeral structures, film, web or other 'virtual projects' that promote a clear sense of identity to those within the settlement and external to it, to community choirs and so forth.</p> <p>Examples could be provided to help clarify the definition if necessary such as for Art Integrated into Physical Form and Function examples would be:  "Infrastructure related works. Involvement of artists within planning and design teams to contribute to the development of an articulate and legible landscape for example focussed around (although not limited to) points of entry and orientation,, highways and associated landscape, public transport infrastructure, cycle paths and bridleways, green spaces, pedestrian corridors and play spaces."</p>	<p>The SPD has included a definition of Public Art in order to provide clarity as to what will be accepted as being Public Art within South Cambridgeshire. However it is accepted that the broad categories suggested are a useful definition for Public Art and therefore an additional paragraph will be added into the SPD.</p>	<p>An additional paragraph is to be added after paragraph 2.1 and will result in subsequent changes to the paragraph numbering that follows. This new paragraph will read as follows: "There are two broad categories of Public Art which are as follows:</p> <p>(a) Art Integrated into Physical Form and Function.  Projects that have a physical, permanent outcome integrated into the form, function, style or content of a place, space or building. These will range from projects where artworks have been incorporated into the design or masterplanning of buildings, townscapes or landscapes to the design and making of individual physical elements within them.</p> <p>(b) Arts Activities.  A programme of projects that will range from creative consultation to festivals, ephemeral structures, film, web or other 'virtual projects' that promote a clear sense of identity to those within the settlement and external to it to community choirs and so forth and which will support local community development strategies."</p> <p>The first sentence of paragraph 2.2 to be deleted and replaced with the following wording: "Such works can include:..."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
			"Design of Buildings - involvement of artists within planning and design teams to contribute to the creation of distinctive and stimulating buildings and places that can provide public and community facilities, residential provision, commercial and employment development, and retail and leisure developments."		
<b>2.3</b>					
22065 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 2.3 - 2nd Bullet Point  English Partnerships / Gallagher are concerned that the phrase "an open procurement process" could be misinterpreted.	This text should be amended to read "a clearly understood procurement process."	The amendment suggested is to be accepted.	The second bullet point in paragraph 2.3 be amended to read: "The work should result from a clearly understood procurement process."
22040 - Cambourne Arts	Object	Non-professional artists should be encouraged.	Change "a living professional artist" to "a living professional artist, possibly in collaboration with local non-professional artists."	The Council accepts that non-professional artists could make a beneficial input into Public Art projects. The wording of the first bullet of paragraph 2.3 is to be amended to remove reference to the artist, and therefore avoid any confusion.	The first bullet point in paragraph 2.3 should be amended to read as follows: "Commissioned work should be original and intrinsic to the architecture or landscape of the scheme."

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22216 - Marshall of Cambridge (Holdings) Limited	Object	The criteria for the assessment of public art seems unnecessarily restrictive as set out. Why for example does there need to be reference to a professional artist. Talented amateurs may well have an equally compelling role. It is also difficult to understand why a previously unrealised design should be ruled out. Similarly architects of buildings may be talented artists capable of embellishing their buildings in a manner which gives pleasure to the public. To rule them out seems extreme.		<p>The Council agrees that it is not necessary to refer to a professional artist and the wording of the first bullet of paragraph 2.3 is to be amended to remove reference to the artist.</p> <p>It is accepted that architectural detail, ornamentation, decoration or functional elements etc. are important to the creation of good design in a development. The final bullet point of paragraph 2.3 is to be amended to reflect this.</p>	<p>The wording of the first bullet point of paragraph 2.3 is amended in Representation 22040. No further change.</p> <p>The wording of the final bullet of paragraph 2.3 is to be amended to read as follows:</p> <p>"In this context the definition could consist of functional elements designed by artists, architects, urban designers, landscape architects or interior designers."</p>
22066 - English Partnerships and Gallagher Longstanton Limited	Object	<p>Paragraph 2.3 - Final Bullet Point</p> <p>English Partnerships / Gallagher believe that if an artist is an integral part of the overall design team and public art is to be integrated into the overall design of a development, seeking to define which members of the design team cannot contribute to public art is perverse.</p>	Therefore in accordance with a broader definition of public art (see English Partnerships / Gallagher representation on paragraph 2.2) the final bullet point under Paragraph 2.3 should be deleted.	Paragraph 2.3 seeks to define what work will be considered Public Art. This paragraph does not seek to define which members of the design team can or cannot contribute to Public Art. The Council accepts that architectural detail, ornamentation, decoration or functional elements etc. are important to the creation of good design in a development. The final bullet point of paragraph 2.3 is to be amended to reflect this.	The wording of the final bullet point of paragraph 2.3 is amended in Representation 22216. No further change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22036 - University of Cambridge	Object	<p>We object to the inclusion of the criteria that specify what constitutes public art. The SPD should not be so prescriptive in this respect.</p> <p>Specifically, it should not prescribe who should be commissioned, how they should be commissioned or restrict the provision of public art to all but professional artists.</p> <p>Architectural detail, ornamentation and decoration can make a positive contribution as public art whether designed by an artist or architect or other professional designer.</p> <p>The SPD guidance should focus on improving the public realm through public art as an outcome and be less prescriptive about the processes for achieving that outcome.</p>	<ul style="list-style-type: none"> <li>i) Delete reference to 'living' artists (public art should not be defined solely as works by living artists)</li> <li>ii) Delete reference to the procurement process. It is inappropriate for the SPD to prescribe a particular process.</li> <li>iii) Make clear that architectural detail, ornamentation and decoration can be defined as public art.</li> <li>iv) Make clear that, irrespective of whether such detailing, ornamentation or decoration is designed by an artist or other design professional it can still be considered as public art</li> </ul>	<p>The SPD is not making absolute statements about Public Art but is defining what Public Art is for South Cambridgeshire District Council. The SPD has included criteria as to what constitutes Public Art in order for there to be clarity about what the Council will accept as being Public Art. Public Art is distinct from other design features incorporated into a development scheme. Public Art should not include mass produced objects such as garden furniture from a retail store. It must be unique / specific for each location. The Council recognises the contribution that architectural detail etc can make to a development scheme.</p> <p>The idea of using a living artist is to ensure that the artwork is designed specifically with the particular scheme in mind rather than retro-fitting old art works. The artist will then be able to be involved in the development of the whole scheme and will be able to involve the community in the design of the artwork to produce an end result that is an integral part of final development.</p>	<p>Additional wording to be added to paragraph 2.3. At the end of the first sentence the following words to be added:</p> <p>"for South Cambridgeshire District Council."</p>

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b><i>Chapter 3 - Funding</i></b>					
<b>3.1</b>					
22067 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships / Gallagher are concerned that there is no reference within this paragraph or to anywhere within Chapter 3 to other sources of funding other than funding from a developer. There are a wide range of funding sources for public art and it is recommended that a paragraph is incorporated into the SPD to describe the potential sources of funding and procurement mechanism for public art in addition to funding from developers.	<p>It is recommended that a paragraph is incorporated into the SPD to describe the potential sources of funding and procurement mechanism for public art in addition to funding from developers, including:</p> <ul style="list-style-type: none"> <li>- Initiatives by community organisations or delivery partners</li> <li>- National funding organisations (such as the Arts Council, Lottery Fund etc)</li> <li>- Trusts and Foundations</li> <li>- Local charitable and voluntary organisations</li> </ul>	The SPD is aiming to show developers how Public Art could be incorporated into their development schemes. South Cambridgeshire District Council has a policy that it expects developers to dedicate between 1% and 5% of the associated construction costs of the capital project to Public Art. Additional information could be provided on alternative sources of funding but this funding is likely to be only a part of the cost of Public Art with the developer's initial contribution being the main driver.	<p>A new paragraph will be added after 3.3 which will result in subsequent re-numbering of the paragraphs that follow.</p> <p>The new paragraph to read:      "In addition to funding from developers there are other potential sources of funding for Public Art. This funding is likely to be only part of the cost of Public Art with the developer's initial contribution being the main driver. Alternative funding could include the following: i) Initiatives by community organisations or delivery partners; ii) National funding organisations (such as the Arts Council, Lottery Funds etc); iii) Trusts and Foundations; iv) Local charities and voluntary organisations."</p>
<b>3.2</b>					
22068 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships / Gallagher believe it is unreasonable and inappropriate to require developers to contribute between 1% to 5% of the construction costs to public art.</p> <p>English Partnerships / Gallagher are very concerned that this paragraph as currently drafted is in conflict with national guidance (Paragraph B9 of ODPM Circular 05/2005) and therefore is not in accordance with the requirements of an SPD as set out at section 19 of the Planning and Compulsory Purchase Act (2004).</p>	English Partnerships / Gallagher therefore strongly recommend that this paragraph is deleted from the SPD.	The SPD is intended to assist the achievement of Policy SF/6 in the adopted Development Control Policies DPD. This encourages developers when making planning applications to make provision for Public Art. It states in the supporting text to this policy that 'ideally' between 1% and 5% of the total cost of the development be allocated to Public Art. The SPD is only re-stating what already appears in the adopted DPD.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22160 - Cambridgeshire County Council	Object	There are revisions required to the text for editing purposes.	Para 3.2 substitute "expects" with "would expect" to reflect the status of the original policy SF/6 as one to encourage development and the conditional language used within the flow diagram within the SPD.	Agree with the principle and the text should be amended to reflect the status of the original policy as one to encourage development.	The wording of paragraph 3.2 is to be amended in response to Rep 22031. No further change.
22217 - Marshall of Cambridge (Holdings) Limited	Object	This refers to an expectation that between 1-5% of construction costs will be dedicated to public art. Whilst this is expressed as an expectation the question must be what is the basis for that expectation. 1% for art has become more familiar over recent years and it has been established that on large scale schemes even that may be excessive.		The supporting text to Policy SF/6 on Public Art mentions the fact that the Council has adopted a Public Art Policy that encourages developers to allocate a proportion of the budget for the implementation of a public art scheme. It states that this proportion is ideally between 1% and 5%. This policy was challenged at the Independent Examination of the Development Control Policies DPD and the inspectors did not amend the policy or the supporting text. It is not for the consultation of this SPD to seek to make changes to the adopted policy in the DPD.	The wording of paragraph 3.2 is to be amended in response to Rep 22031. No further change.
22037 - University of Cambridge	Object	A 5% public art contribution is far too high a cost for development to bear.  Adopted planning policy for Cambridge City requires 1% of capital construction costs to be allocated for public art.  The strategy for South Cambridgeshire should be consistent with that for Cambridge City.	Replace paragraph 3.2 with the following wording:-  South Cambridgeshire District Council will ask developers to dedicate 1% of the associated construction costs of the capital project to public art.	The current adopted Public Art Policy for South Cambridgeshire encourages developers to allocate between 1% and 5% of the total cost of the development. This is referred to in the supporting text for Policy SF/6 on Public Art in the adopted Development Control Policies DPD with the addition of 'ideally' (paragraph 6.7).	The wording of paragraph 3.2 is to be amended in response to Rep 22031. No further change.
22069 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships / Gallagher believe that although it is helpful to have an example of suitable text that might be included in a s.106, any legal agreement will need to reflect the specific circumstances of that development.	Therefore the text in paragraph 3.6 should be amended to state 'suggested template for the Section 106 agreement.'	Agree with amendment.	Text in paragraph 3.6 should be amended to read: "See Appendix 2 for the suggested template for the Section 106 agreement."

**3.6**

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>3.9</b>					
22070 - English Partnerships and Gallagher Longstanton Limited	Object	SPD fails to acknowledge that there are other mechanisms that may be more relevant and appropriate for managing and maintaining the public realm and public works of art within the public realm:  a) Offering to grant a lease of the relevant part of the public area where the public art is located and transferring responsibility and management arrangements as part of the lease; b) A management entity taking responsibility for managing and maintaining the public areas in accordance with protocols agreed for that management entity c) A relevant public or statutory authority taking responsibility for managing and maintaining public art		There are reasonable ways of ensuring that work is maintained and on large schemes these will need to be negotiated and agreed. An additional paragraph is to be made after paragraph 3.9 to clarify the matter.	A new paragraph will be added in the funding chapter to follow paragraph 3.9. The wording of this new paragraph is as follows: "On large schemes developers may need to negotiate other arrangements for managing and maintaining the public space and Public Art within this space. This includes the following - a) Offering to grant a lease of the relevant part of the public area where the Public Art is located and transferring responsibility and management arrangements as part of the lease; b) A management entity taking responsibility for managing and maintaining the public areas in accordance with protocols agreed for that management entity; c) A relevant public or statutory authority taking responsibility for managing and maintaining Public Art."
22218 - Marshall of Cambridge (Holdings) Limited	Object	This reference to maintenance as well as decommissioning must be set properly in the context of the advice contained in the relevant paragraphs of Circular 05/2005.		Paragraph 3.9 does not include any requirements that are contrary to Circular 05/2005 and an amendment will be made to the wording to clarify this. The Council is proposing to produce a Planning Obligations SPD and this is likely to consider the maintenance and decommissioning matters.	The final sentence to be added at the end of paragraph 3.9 to read as follows: "Consideration of maintenance of the Public Art should be set out in the context of the advice contained in paragraphs B18-20 in Circular 05/2005 on Planning Obligations."
22161 - Cambridgeshire County Council	Object	There are revisions required to the text for editing purposes.	Para 3.9 page 17 to read page 19.	Agree.	Amend reference in paragraph 3.9 to "page 17" to read "page 19".

<b><i>Representation No.</i></b>	<b><i>Nature</i></b>	<b><i>Representation Summary</i></b>	<b><i>Change To Plan Sought</i></b>	<b><i>Council's Assessment</i></b>	<b><i>Change To Draft SPD</i></b>
22027	Support	If the relevant Parish Council to the artwork will be taking on the responsibility of maintaining and looking after the work, their views and opinions should be sort at an early stage. On a recent housing project I have been involved with, the Parish council stipulated a 20 year maintenance free period for artwork, which limited greatly the type of work and materials considered. The Parish council was also very wary about indirect costs incurred, asking for a 1 meter paved area around any artwork to make cutting the grass easy and designs adjusted to stop wind blown litter accumulating.		Support and comments noted.	No change.

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b><i>Chapter 4 - Implementing Public Art</i></b>					
4.4 22049	Object	Reference to 'themes' will encourage a prescriptive and predictive approach to commissioning. Commissioners should set clear aims and objectives for a project. Artists should be given scope to interpret these appropriately for the given context.	Adapt para title and wording to reflect comment.	The Council did not want to suggest that only themes should be used for Public Art in all new development. Artists should be allowed to have the freedom to create Public Art relevant to a particular location and not be restricted by having to use one particular theme. Therefore paragraph 4.4 is to be reworded.	The heading for this section to be renamed: "PUBLIC ART COMMISSIONS".  The first sentence of Paragraph 4.4 is to be deleted and replaced by the following to read: "Commissioners should set clear aims and objectives for Public Art. These may be based on themes relevant to the nature of the locality such as the uses, historic or contemporary, landscape character or biodiversity, or function of the public space or building(s). The beneficiaries must be clearly identified where artists are to be given scope to interpret these appropriately for the given context. In most cases the clients will be the occupiers of the new development or their representatives."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22071 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships / Gallagher are concerned that this paragraph is too prescriptive as it recommends that "public art in new development should be based on themes". English Partnerships / Gallagher believe that it is unnecessary and in many circumstances inappropriate for all Public Art in new development to be based on themes. Theming can lead to a "dumbing down" of creativity and can prevent, particularly in larger schemes, a variety of approaches to public art to emerge in response to varying conditions and environments within a site.	English Partnerships / Gallagher recommend that this paragraph is deleted or if it is to be retained then themes should be referred to as "one possible approach to a site".	The Council did not want to suggest that only themes should be used for Public Art in all new development. Artists should be allowed to have the freedom to create Public Art relevant to a particular location and not be restricted by having to use one particular theme. Therefore paragraph 4.4 is to be reworded. However in response to the suggestion that theming can lead to 'dumbing down' of creativity this has certainly not been the case for Arbury Park where the fruit and flower growing theme has been an inspiration. Additional wording to be added to the paragraph to support this.	The first sentence of Paragraph 4.4 is to be deleted and replaced by the following to read: "Commissioners should set clear aims and objectives for Public Art. These may be based on themes relevant to the nature of the locality such as the uses, historic or contemporary, landscape character or biodiversity, or function of the public space or building(s). The beneficiaries must be clearly identified where artists are to be given scope to interpret these appropriately for the given context. In most cases the clients will be the occupiers of the new development or their representatives."  Also to emphasise the success that using a theme can bring, additional wording to be added to the second sentence so that it reads as follows: "At Arbury Park the fruit and flower growing industries provided the main theme for a number of art works on the 900 home development and has resulted in a wide variety of high quality art interventions."
22086 - Natural England	Support	Natural England welcomes the statement at 4.4 and suggest that it is extended thus: "Public Art in new development should be based on themes relevant to the nature of the locality such as the uses, historic or contemporary, landscape character and biodiversity, or function of the public space or building/s".		Support noted and amendments made to paragraph.	The wording of paragraph 4.4 is to be amended in response to Rep 22049. No further change.

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<b>4.7</b>					
22162 - Cambridgeshire County Council	Object	There are revisions required to the text for editing purposes.	Para 4.7 and 4.8 only "commercial" development has been included; this needs clarification.	The Public Art policy clearly states that it applies to residential developments and to other developments including office, manufacturing, warehousing and retail development. In the section on Public Art Plans there needs to be a clearer definition of what is meant as 'commercial' development.	In both paragraph 4.7 and 4.8 delete in the first paragraph the word 'commercial development' and replace with 'other development including office, manufacturing, warehousing and retail development'.
22050	Object	Knowledge, skills and time for project management throughout the process are important - suggest there could be an additional bullet point requiring details of what provision will be made for this.		Accept suggestion that an additional bullet point be made to what needs to be in Public Art Plans for small scale developments.	Additional bullet point to be added as the first point to paragraph 4.7 to read as follows: "A Management Plan consisting of a summary of the knowledge, skills and time allowed for Public Art project management."
<b>4.8</b>					
22051	Object	Knowledge, skills and time for project management throughout the process are important - suggest there could be an additional bullet point requiring details of what provision will be made for this.		Accept that an additional bullet point be added to what needs to be contained in the Public Art Plan for a large scale scheme.	An additional bullet point to be added to paragraph 4.8 and is to be the first point. It is to read as follows: "A Management Plan consisting of a summary of the knowledge, skills and time allowed for Public Art project management."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22072 - English Partnerships and Gallagher Longstanton Limited	Object	<p>As currently drafted this paragraph would be in conflict with DPD policy and therefore would not be in accordance with the requirements of an SPD as set out at section 19 of the Planning and Compulsory Purchase Act (2004).</p> <p>It is unreasonable and inappropriate for outline applications for major developments to provide all the details as set out in paragraph 4.8 within a Public Art Plan or Strategy.</p> <p>At the outline stage for major developments it would only be possible within a Public Art Strategy to provide a broad description of types of art works and themes being explored and possibly give some indication of the different areas within the site where public art would be appropriate.</p>	<p>The level of detail appropriate for a Public Art Strategy to accompany outline planning applications for major developments should be recognised within this paragraph and therefore English Partnerships / Gallagher recommend that this paragraph is revised to read:</p> <p>"Large Scale Schemes</p> <p>For large scale schemes, where it is probable that an outline planning application will be initially submitted for the site, a Public Art Strategy will need to contain:</p> <ul style="list-style-type: none"> <li>* The nature and purpose of the Public Art intervention and its relationship to the site including anticipated aims and benefits.</li> <li>* An outline of the scope of artists' involvement in the scheme, the potential recruitment and selection processes and likely timescales.</li> <li>* The process for community liaison and engagement - both undertaken and proposed.</li> <li>* A broad indication of programme priorities.</li> <li>* A statement indicating that responsibility for future care and future maintenance will be addressed as the details of the Public Art Programme are developed."</li> </ul>	<p>The Council accept that amendments should be made to paragraph 4.8 - the contents of a Public Art Plan to reflect that for large scale schemes a detailed plan may not be available in the early stages of the planning of the development. However it is still the Council's opinion that an artist should be engaged at the earliest point to contribute to the masterplanning process and to feed into the design and access statement.</p>	<p>The bullet points of paragraph 4.8 will be amended to read as follows:</p> <p>"1) The nature and purpose of the Public Art intervention and its relationship to the site including anticipated aims and benefits; 2) A brief for the involvement of the artist(s), the potential recruitment and likely timescales; 3) The process for community liaison and engagement - both undertaken and proposed; 4) An indication of the Public Art programme priorities set in the context of the phasing of the development and likely costs; 5) The ownership, maintenance and decommissioning scheme; 6) A statement indicating the responsibility for future care and maintenance - this will be addressed as details of the Public Art Programme are developed."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>4.9</b>					
22167 - Great Shelford Parish Council	Object	<p>Public Art can be a problematic proposal and requires adequate funds to make a positive contribution to a new development. It is doubtful whether on smaller developments the developers contribution will be enough for a significant work of art. In these circumstances it may be better to have living art - gardens or landscape for the community in which it can get involved with landscape designers.</p> <p>Therefore in Section 4.9 though welcoming the establishment of a support group it should include representatives of a wide number of artistic disciplines who can give sound, unbiased information on proposals.</p>		<p>Note the support for the idea of setting up a Public Art Support Group and the suggestion of having a wide range of artistic experts to be members of the proposed group.</p> <p>However, the Council has reviewed its working practices and in streamlining its processes has decided to reduce the number of advisory groups and not create new ones. Consequently Public Art should be considered through existing Council processes and therefore it is proposed to remove all references in the SPD to the Public Art Support Group.</p> <p>Paragraph 4.3 should be amended to acknowledge the importance of involving developers, artists, the Council and particularly the local community in order to implement successful Public Art.</p>	<p>Delete heading "Public Art Support Group" before paragraph 4.9 and delete paragraph 4.9. Delete heading "Public Art Support Group" before paragraph 5.22 and delete paragraph 5.22. Delete Box 17 from the Flow Chart.</p> <p>Add the following wording to the end of paragraph 4.3:</p> <p>"Local involvement will be particularly important and where Public Art does not form an intrinsic part of the architecture or landscaping of a development, commissioning should normally await the arrival of the new residents or users of the development."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>The Flow Chart</b>					
22205 - Cambridge Preservation Society	Object	More details of any need to decommission a public art feature and need to clarify future ownership rights at such time of installing a feature.		Accept amendments to clarify the future ownership of an artwork. The wording of the relevant box in the Flow Chart will be amended, as well as paragraph 5.18	<p>The wording of the first sentence in Box 25 of the Flow Chart will be amended to read as follows:</p> <p>"Once any site-specific art works are completed, the Developer will confirm that they are ready to be transferred and the legal documents (including the decommissioning process and likely future ownership) will be prepared by Legal representatives of the Developer and the Parish Council (or approved management organisation)."</p> <p>An additional sentence is to be added to the end of paragraph 5.18 to read as follows:</p> <p>"Clarity on the existing and likely future ownership of artworks is essential."</p>
22075 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships / Gallagher note that the cross reference in this box appears to be to the wrong Appendix - it should cross reference to "Appendix 2" not 'Appendix 3'.</p> <p>Therefore as currently drafted this paragraph is in conflict with national guidance (The Validation of Planning Application) and therefore is not in accordance with the requirements of an SPD as set out at section 19 of the Planning and Compulsory Purchase Act (2004). English Partnerships / Gallagher therefore recommend that this paragraph is amended so that reference is to the submission of a statement of the proposed heads of terms for a s.106 Agreement.</p>		<p>The cross reference to Appendix 3 will be amended to read Appendix 2 in Box 14 of the Flow Chart. The wording in Box 13 will be amended to state that it is a statement of the proposed heads of terms for a Section 106 Agreement that will be submitted with the planning application</p>	<p>The cross reference to 'Appendix 3' will be amended to read 'Appendix 2' in Box 14 of the Flow Chart.</p> <p>Box 13 will be amended and the second bullet point will be now read as follows:</p> <p>"A statement of the proposed heads of terms for the Section 106 Agreement for consideration."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22074 - English Partnerships and Gallagher Longstanton Limited	Object	Box 13 - Page 14  English Partnerships / Gallagher recommend that within this box it should be recognised that at an outline planning application stage it would not be possible to incorporate public art into the landscape architect drawings.		The Flow Chart is intended to be used for applicants of both large and small developments and whilst it may not be possible to incorporate Public Art into some of the application drawings for the larger schemes it is certainly possible on others.	Box 13 of the Flow Chart on page 14 of the SPD shall be amended. The final sentence to be amended to read as follows: "Ideally the Public Art will be incorporated into the detailed architect / landscape architect drawings submitted as part of the planning application."
22204 - Cambridge Preservation Society	Object	Add "record keeping - immediately upon completion full description and pictorial information of public art features should be provided in form of written up summary with pictorial and other information for a local public art reference archive as well as discrete plaque installed on-site.		The Council accept the suggested amendment and a new section is to be added after paragraph 4.11.	A new section to be added after paragraph 4.11 to read as follows.  The heading is to be: "RECORD KEEPING".  The new paragraph will read: "Immediately upon completion a full description and pictorial information of the Public Art should be provided in the form of a written up summary with pictorial and other information for a local Public Art reference archive."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22076 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships / Gallagher are concerned that this part of the flow chart fails to acknowledge that there are other mechanisms that may be more relevant and appropriate for managing and maintaining the public realm and public works of art within the public realm, such as:</p> <ul style="list-style-type: none"> <li>a) Offering to grant a lease of the relevant part of the public area where the public art is located and transferring responsibility and management arrangements as part of the lease;</li> <li>b) A management entity taking responsibility for managing and maintaining the public areas</li> <li>c) A relevant public or statutory authority taking responsibility for managing and maintaining public art.</li> </ul>		<p>The suggested amendments have been incorporated in to paragraph 3.9 and the text in Box 24 has been amended.</p>	<p>A new paragraph will be added in the funding chapter to follow paragraph 3.9. The wording of this new paragraph is as follows:</p> <p>"On large schemes developers may need to negotiate other arrangements for managing and maintaining the public space and Public Art within this space. This includes the following - a) Offering to grant a lease of the relevant part of the public area where the Public Art is located and transferring responsibility and management arrangements as part of the lease; b) A management entity taking responsibility for managing and maintaining the public areas in accordance with protocols agreed for that management entity; c) A relevant public or statutory authority taking responsibility for managing and maintaining Public Art." Also the text in Box 24 is to be amended to read as follows - "Once provided any installation will need to vest in an owner the ability to maintain or decommission the artwork as appropriate or necessary. Usually a commuted sum will need to be allocated to achieve this and to be included in the Section 106 Agreement."</p>

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b>Appendix 1 - Who does what - Principles of Good Practice</b>					
5.2					
22028	Support	Consideration of Health and safety issues, artists should look at BS1176 childrens playground equipment, as a general best practise design criterea, and also look at Department For Transport Inclusive Mobility <a href="http://www.mobility-unit.dft.gov.uk">www.mobility-unit.dft.gov.uk</a> . Children climbing all over sculptural work, and consideration for finger, eye, fall and head injuries. Plus visually impaired pedestrians pavement use is very often overlooked		Note support and comments made. Additional wording to be added to paragraph 5.2 to take into account the health and safety considerations.	An additional sentence to be added to end of paragraph 5.2 to read:  "Artists should always have due regard to health and safety issues in respect of art works."
5.3					
22054	Support	A very good summary of artists' roles [whereas the definitions given in paras 2.2 and 2.3 are more limiting and could be adapted to incorporate more of the spirit of what is expressed here]		Support noted. It is proposed to amend the definition of Public Art in paragraphs 2.2 and 2.3 in response to other representations - this should address the concerns raised.	No change.
5.8					
22057	Object	Too limiting - the quality of the art should always be paramount. Commissioners should be encouraged to set their sights high and look for the best possible artist for every project.	Developers should seek to appoint the artist best qualified to undertake the particular project, taking into account those suitably qualified artists in or connected with S Cambs District.	The Council supports the idea of using the best possible artist for every project. Paragraph 5.8 to be amended.	The wording of paragraph 5.8 is to be deleted and replaced with the following:  "Developers should seek to appoint the artist best qualified to undertake the particular project. Work by notable artists will be encouraged in South Cambridgeshire."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>5.18</b>					
22206 - Cambridge Preservation Society	Object	More details of any need to decommission a public art feature and need to clarify future ownership rights at such time of installing a feature.		The amendment is accepted and amendments to be made to Box 25 of the Flow Chart and to paragraph 5.18.	<p>The wording of the first sentence in Box 25 of the Flow Chart will be amended to read as follows:</p> <p>"Once any site-specific art works are completed, the Developer will confirm that they are ready to be transferred and the legal documents (including the decommissioning process and likely future ownership) will be prepared by Legal representatives of the Developer and the Parish Council (or approved management organisation)."</p> <p>An additional sentence is to be added to the end of paragraph 5.18 to read as follows:</p> <p>"Clarity on the existing and likely future ownership of artworks is essential."</p>

  

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>5.22</b>					
22207 - Cambridge Preservation Society	Object	Add link to Cambridge City Council's Public Art Steering Group in relation to urban extensions covering cross-boundaries.		The Council has reviewed its working practices and in streamlining its processes has decided to reduce the number of advisory groups and not create new ones. Consequently Public Art should be considered through existing Council processes and therefore it is proposed to remove all references in the SPD to the Public Art Support Group.	Delete heading "Public Art Support Group" before paragraph 4.9 and delete paragraph 4.9. Delete heading "Public Art Support Group" before paragraph 5.22 and delete paragraph 5.22. Delete Box 17 from the Flow Chart.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>5.26</b>					
22041 - Cambourne Arts	Object	Non-professional artists should be encouraged.	<p>Change:</p> <p>"The Council will encourage an artist to involve local people in the development of artworks as the best way to gain public awareness and support."</p> <p>to:</p> <p>"The Council will encourage an artist to involve local people (including local non-professional artists) in the development of artworks as the best way to gain public awareness and support."</p>	The Council agree that non-professional artists have a role to play in the development of local artwork and therefore paragraph 5.26 will be amended.	<p>The wording of final sentence in paragraph 5.26 will be amended to read as follows:</p> <p>"The Council will encourage the involvement of local people (including local non-professional artists) in the development of artworks as the best way to gain public awareness and support."</p>

## Appendix 3 - Case Studies

### Themed work

22208 - Cambridge Preservation Society	Object	Genome Strip (Sustrans Cycleway - the coloured strip itself blends in well with the rural countryside but the notice board and vertical DNA ladder are completely inappropriate to that setting (and the usage of non-native tree species/cultivars).	Comment noted.	No change.
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## Appendix 4 - Further Information

### Local Information

22209 - Cambridge Preservation Society	Object	Should also refer to the (draft) Landscape Guidance SPD.	Agree.	Add reference to "Landscape Guidance for Development Sites SPD (in preparation)" in Local Information.
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# *Trees & Development Sites Supplementary Planning Document*

## *Public Participation Report*

Chapter 1 - Introduction to the Supplementary Planning Document

1.1

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b><i>Chapter 1 - Introduction to the Supplementary Planning Document</i></b>					
1.1 22223	Object	I would like the land behind "Kevrit" 30 Riddy Lane, Bourn, Cambs be included in village framework for future development. The land is set behind houses and the drive would be able to accommodate a refuse lorry and service vehicles. There would be no intensification of traffic on Riddy as there is a private drive to the land. The land or potential development does not overlook housing and would not encroach anyone's privacy. I believe a selective development would enhance the village.		Supplementary Planning Documents cannot make new policy, rather they expand upon policies in the Development Plan Documents (DPD) and provide additional guidance to developers and applicants on how these policies are implemented. Village Frameworks are defined in Policy DP/7 in the Development Control Policies DPD, and their boundaries are currently being considered by Planning Inspectors as part of the Examination of the Site Specific Policies DPD. Any change to the village framework boundary needs to be pursued through the DPD process and is not a matter that can be addressed in the Supplementary Planning Documents.	No change.
22222 - East of England Regional Assembly	Support	The Regional Planning Panel Standing Committee considered the attached report at the meeting of 27th June 2008 and endorsed the recommendation that: 'The four draft Supplementary Planning Documents prepared by South Cambridgeshire District Council are in general conformity with the RSS.'		Noted.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22156 - Cambridgeshire County Council	Support	In general support, but it is considered that the status of veteran trees has been overlooked and the following comments are offered to amplify this and other prospective SPDs which have direct relevance.		Support noted. The Council has identified areas of ancient woodland in the Biodiversity Strategy, together with measures to conserve them. The Council is also producing a Biodiversity SPD, which will also refer to veteran trees. It is not necessary to duplicate this information within the Trees SPD, however a reference to ancient woodland and veteran trees and cross-reference to the Biodiversity Strategy should be included.	Amend paragraph 2.11 to read: "Sites to be developed may also be important for species protected under wildlife legislation or contain ancient woodland or veteran trees which are a valuable biodiversity resource. Further guidance on these can be found in the Council's Biodiversity SPD and Biodiversity Strategy."
22059 - English Heritage	Support	Thoughtful planting of trees and landscaping are equally important in new development. Where greenfield sites are to be developed the existing features of the site should be considered, and those of importance retained; for instance, historic hedgerows. Where important archaeological remains exist, tree planting can cause damage and should be avoided. In existing neighbourhoods, street trees often add to and complement the townscape and maintenance programmes that recognise this are essential.		Support noted. Paragraph 3.1 requires comprehensive site surveys are undertaken to allow key components of a site to be identified, retained, incorporated and protected throughout development. Therefore any tree on or off the site that is impacted by the development will be identified by the Site Survey and can be assessed and those of importance retained. New planting will be addressed in the Landscaping SPD.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>1.5</b>					
22102 - English Partnerships and Gallagher Longstanton Limited	Object	The draft SPD makes reference to documents that will be produced in the future (the Landscape and Biodiversity SPDs). Given these documents are not yet available it is not possible to determine the impact of the policies in those documents on the Trees SPD. Furthermore, it is not possible to carry out a comprehensive assessment as the implications of policy in other (as yet unpublished documents) cannot be determined. Furthermore, English Partnerships and Gallagher wish to reserve the right to revisit comments on this document when the Landscape and Biodiversity SPDs are published to ensure that complementary documents are adopted.	As such the document should be revised to make reference to 'emerging' SPD as this more accurately reflects the position.	Supplementary Planning Documents cannot introduce new policy, rather they expand upon policies in the adopted Development Plan Documents. There is no need to amend the reference to the Landscape and Biodiversity SPDs within the text of the SPD to indicate that they are "emerging". The SPDs are listed in Appendix 2 together with their status.	Ensure the status of SPDs listed in Appendix 2 reflects the latest position.
<b>1.6</b>					
22087 - Natural England	Support	We support the aims of this SPD and in particular its objective to assist achievement of the LDF objectives for the conservation and enhancement of biodiversity and landscape character, including Development Control Policies DPD objectives NE/b: To protect and enhance the character and appearance of landscapes and natural heritage and NE/c: To protect and enhance biodiversity.		Support noted.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>	
<b>1.8</b>	Object	22103 - English Partnerships and Gallagher Longstanton Limited	The change is requested to ensure that the policy recognises that there are different types of planning applications require different levels of detail. For example outline planning applications aim to secure the principle of development and should provide sufficient detail to allow robust environmental impact assessment in line with the regulations set out in Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended 2006 and 2007). However, reserved matters or full applications can provide more detail given the level of design details that are produced.	English Partnerships and Gallagher request that bullet two of this paragraph be reworded as follows: 'Undertake full surveys of existing landscape and biodiversity features, to a level of detail appropriate to the type of application, and conserve the environmental aspects of the site'.	Paragraph 1.8 summarises the content of a large number of policies contained in the Development Plan Documents (DPD), as it is not practicable to replicate them all in the SPD. The wording of bullet point 2 accurately reflects that contained in policies in the Area Action Plans (such as Policy CE/17 in the Cambridge East Area Action Plan). Had the actual policy text from the DPDs been included in the SPD it would not be possible to amend it, as SPD cannot alter policy. As such, the summary of the policy wording is accurate, and therefore should not be amended. Notwithstanding paragraph 4.1, which sets out the survey requirements, acknowledges that every development will be different in scale and complexity and that the survey requirements outlined may be required in part or full.	No change.

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b><i>Chapter 2 - The Need to Consider Trees</i></b>					
2.1					
22200 - Cambridge Preservation Society	Object	No references are made to tall hedges or hedges with standard trees and their preservation / maintenance etc; veteran trees are not mentioned and if there is a list and if all veteran trees are protected by TPO or Conservation Area designation of other protective designation.		<p>SCDC cannot legally protect hedges although a hedge may fall under the Hedgerow regulations. Hedges on a development site would be considered in their context to the site and suitability to retain, enhance etc.</p> <p>Standard trees within a hedge may be protected through a Conservation Area or Tree Preservation Order designation. However it is not common practice to serve a TPO on trees within falling distance of the Highway as they can fall under the Highways Act and in certain circumstances can be removed without requiring consent from the local authority.</p> <p>Veteran trees by their nature would be exempt from a TPO being served. If a tree is protected by a TPO and is now considered a veteran then SCDC can 'manage' the tree through applications for tree works. Veteran trees are valuable resource, for both landscaping and biodiversity. There is already useful guidance in the Council's Biodiversity Strategy, including a map showing Ancient &amp; Semi Ancient Woodland and Ancient Replanted Woodland. Rather than repeat this detailed information it would be useful to add a cross-reference to the Council's Biodiversity Strategy.</p>	<p>Amend paragraph 2.11 to read:</p> <p>"Sites to be developed may also be important for species protected under wildlife legislation or contain ancient woodland or veteran trees which are a valuable biodiversity resource. Further guidance on these can be found in the Council's Biodiversity SPD and Biodiversity Strategy."</p>
22197 - Cambridge Preservation Society	Object	Capital letters Dutch Elm Disease.		Agree.	<p>Amend second sentence of paragraph 2.1 to read: "One of the least wooded counties also having suffered extensive loss of Elm due to the Dutch Elm Disease and more recently Beech, Horse Chestnut and Ash."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>2.2</b>					
22198 - Cambridge Preservation Society	Object	In bold and improved phrasing covering the qualities of trees to make fresh air for all.		Agree, the 5th bullet point should be consistent with the others and should be amended accordingly.	Amend the 5th bullet of paragraph 2.2 to read: "Fresh air for all; trees provide clean air as they take in carbon dioxide and release oxygen as part of their living process, acting as carbon sinks."
22105 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher request that 'Enhancing a new development' be revised to acknowledge that retention of existing trees on a new development will not always add a sense of maturity or enhance property value, particularly if the trees are of poor quality, inappropriate species or mix of species. In some cases the environment would be enhanced by comprehensive new landscaping which long term would add greater value than interim retention of existing trees.	English Partnerships and Gallagher request that the sentence be reworded as follows: 'existing trees on a new development can add a sense of maturity ...'	It is acknowledged that not all trees will add to a sense of maturity or add to property value, and the text should be amended to change "will" to "can".	Amend 8th bullet of paragraph 2.2 to read: "Enhancing a new development; existing trees on a new development can add a sense of maturity to a new building and can enhance property value if incorporated at the design stage."
22104 - English Partnerships and Gallagher Longstanton Limited	Object	The text as drafted is inappropriate for inclusion in a planning document.	English Partnerships and Gallagher request that the third sentence of 'Providing a 'feel good factor'' be deleted.	Paragraph 2.2 identifies the role of trees within the built and natural environment. Not only do trees have 'natural' functions, for example for landscaping and biodiversity, but they also have a role in good design, place making and creating sustainable communities in accordance with the aims of Government guidance in Planning Policy Statement 1 (PPS). 'Feel good factor' is an indicator that places are livable spaces and not simply a collection of bricks and mortar. Not only is bird song an indicator that there is biodiversity in place (encouraged by PPS9), but the shade and bursts of colour provided by trees all have their part in good design and creating living spaces. Therefore, inclusion of this text is appropriate.	No change.

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
2.5				

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22052 - Forestry Commission	Object	The Trees & Development SPD is welcomed and, as one would expect, appears to be accurate and consistent with the Authority's responsibilities with respect to the Town & Country Planning Act. However, apart from a single reference to the Forestry Act in relation to TPO's, there are important omissions with regard to the Forestry Commission's statutory responsibilities. This could lead to some confusion, or indeed mislead the reader. Wording to include in the SPD is provided.	<p>The document should, therefore, make reference to the following:</p> <ol style="list-style-type: none"> <li>1. The Forestry Commission is the Government Department with statutory responsibility for trees and woodland. The responsibilities and powers of the Forestry Commissioners in relation to planning are derived mainly from the Forestry Act 1967 and the Environmental Impact Assessment Regulations 1999.</li> <li>2. The Forestry Act (1967) (<a href="http://www.forestry.gov.uk/forestry/INFD-677JBL">www.forestry.gov.uk/forestry/INFD-677JBL</a>) as amended requires landowners to apply for a licence for the felling of growing trees. There are certain specific exemptions for the need for a felling licence, but it may be necessary for an owner (or their agent) to make an application to the Forestry Commission to fell trees covered by a Tree Preservation Order even where permission from the Local Authority has been granted. In such cases the Forestry Commission consults the Local Authority before making a decision.</li> <li>3. The Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 (SI 1999/2228) (<a href="http://www.hmso.gov.uk/si/si1999/19992228.htm">www.hmso.gov.uk/si/si1999/19992228.htm</a>) require anyone who wishes to carry out a relevant project (i.e. afforestation, deforestation, forestry roads or quarries) to obtain consent from the Forestry Commission. There may be a need for a Forestry EIA to be carried out even where the Local Authority has determined that a Planning EIA is not required. In such cases the Forestry Commission is obliged to consider the impact of the change of land use.</li> </ol>	<p>General support for the SPD noted. Agree, it is important to recognise the duties of the Forestry Commission and that they may need to be contacted. In addition, reference should also be made to ancient woodland and veteran trees.</p>	<p>Amend paragraph 2.11 to read: "Sites to be developed, including vegetation and individual trees, may also be important for species protected under wildlife legislation or contain ancient woodland or veteran trees which are a valuable biodiversity resource. Further guidance on these can be found in the Council's Biodiversity SPD and Biodiversity Strategy."</p> <p>Add a new paragraph after 2.11 to read: "The Forestry Commission is the Government Department with statutory responsibility for trees and woodland. The responsibilities and powers of the Forestry Commissioners in relation to planning are derived mainly from the Forestry Act 1967 and the Environmental Impact Assessment Regulations 1999. It may be advisable to contact them to determine if compliance with their statutory duties may be required."</p>

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
		<p>4. Government policy, as set out in the 1994 Sustainable Forestry document, is to operate a general presumption against the conversion of woodland and trees to other use and to protect or ancient and semi-natural woodlands.</p> <p>5. In 1998, the Government published its England Forestry Strategy "A new focus for England's woodland" (<a href="http://www.forestry.gov.uk/forestry/hcou-4ucf8j">www.forestry.gov.uk/forestry/hcou-4ucf8j</a>). The Strategy stated that, "We will continue to exercise a general presumption against the conversion of woodland to other land uses unless there are overriding public benefits, for example to restore important semi-natural habitats. In these situations we will seek to ensure that equivalent areas of new woodland are planted in compensation." The Strategy was revised by DEFRA in 2007 ("England's Trees, Woods and Forests" <a href="http://www.defra.gov.uk/wildlife-countryside/rddteam/forestry.htm">www.defra.gov.uk/wildlife-countryside/rddteam/forestry.htm</a>), but makes no direct reference to this issue.</p> <p>6. The Government's Policy for England's Ancient and Native woodland ("Keepers of time. A statement of policy for England's ancient and native woodland." Defra, Forestry Commission 2005) states that, "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland".</p> <p>7. PPS9 ("Planning Policy Statement 9: Biodiversity and Geological Conservation." ODPM 2005) also contains specific references to ancient woodland:</p>		

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
			<p>"Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as a SSSI). They should not grant planning permission for any development that would result in its loss or deterioration unless the need for, and benefits of, the development in that location outweigh the loss of woodland habitat."</p> <p>8. PPS9 also states that "aged and veteran" trees are important for biodiversity and "their loss should be avoided".</p>		
2.6	22053 - Forestry Commission	Support	<p>Thank you for consulting the Forestry Commission. You may be aware that the Forestry Commission is the Government Department with statutory responsibility for trees and woodlands.</p> <p>The Trees &amp; Development SPD is welcomed and, as one would expect, appears to be accurate and consistent with the Authority's responsibilities with respect to the Town &amp; Country Planning Act.</p>	Support noted.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>2.7</b>					
22106 - English Partnerships and Gallagher Longstanton Limited	Object	The text as drafted does not distinguish whether it is appropriate to preserve existing trees, which is set out in the Act. Section 197a of the Town & Country Planning Act 1990 states 'It shall be the duty of the local planning authority - (a) to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees ...'	Accordingly, the SPD should be amended to accurately reflect the content of the Act, including the text 'whenever it is appropriate'.	Agree the text should be amended to more accurately reflect Section 197a of the Town and Country Planning Act 1990.	Amend paragraph 2.7 to read: "The Town and Country Act 1990 (section 197) specifically charges the Local Planning Authority with the duty to ensure, whenever it is appropriate, when granting planning permission that adequate provision is made for the preservation and planting of trees through planning conditions and the serving of Tree Preservation Orders (TPOs)." Delete paragraph 2.6, to avoid repetition. Delete the heading "Legal Framework" and move the heading "Statutory Legislation" to precede paragraph 2.5.

  

<b>2.8</b>					
22168 - Great Shelford Parish Council	Object	This should be re-worded, you wouldn't get permission to wilfully damage or destroy trees.		The wording in paragraph 2.8 is consistent with that in Section 198(3) of the Town and Country Planning Act 1990, (referred to in Section 211) that states that "a tree preservation order may, in particular, make provision - (a) for prohibiting (subject to any exemptions for which provision may be made by the order) the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of trees except with the consent of the local planning authority, and for enabling that authority to give their consent subject to conditions;" Although it is unlikely that permission would be given for wilful damage to trees, given that this section of the SPD is dealing with statutory legislation relating to trees, it is important that it accurately reflects the wording of the legislation. It should therefore be retained. Paragraph 2.8 identifies that trees can be afforded statutory protection. However, it would be helpful to make clear that contravention of the legislation can result in legal action.	Insert the following text after paragraph 2.8: "Contravention of the statutory legislation relating to trees may result in the local planning authority taking legal action."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>2.9</b>					
22169 - Great Shelford Parish Council	Object	Should explain here that consent is needed for works to TPO trees and if a tree is removed it should be replaced.		Section 206 of the Town and Country Planning Act 1990 states that "(1) If any tree in respect of which a tree preservation order is for the time being in force; (a) is removed, uprooted or destroyed in contravention of the order...it shall be the duty of the owner of the land to plant another tree of an appropriate size and species at the same place as soon as he reasonably can." Agree it would be helpful to explain this in the SPD.	Add a new paragraph after paragraph 2.10: "If any tree subject to a TPO which has been identified for retention or for which prior consent for works or removal is removed, uprooted or destroyed in contravention to a TPO it will be the responsibility of the land owner to plant another tree of an appropriate size and species at the same place as soon as he reasonably can."  Renumber remaining paragraphs accordingly.
<b>2.10</b>					
22170 - Great Shelford Parish Council	Object	Would it be useful to briefly highlight items relating to trees in the Biodiversity Strategy in this report e.g. preservation of veteran trees and their importance to wildlife. Suspect there is an assumption by developers that a tree with a fair bit of dead wood should be removed.		Agree it would be useful to add guidance about veteran trees and their importance to wildlife. The Council is currently producing a Biodiversity SPD and this could usefully be cross-referred to, together with the Biodiversity Strategy. The proposed amendments to paragraph 2.11 in response to representation 22156 will address this issue.	No further change.
<b>2.11</b>					
22088 - Natural England	Object	Suggestion for re-wording of paragraph 2.11.	Suggestion for re-wording of paragraph 2.11 to read: "Sites to be developed, including vegetation and individual trees, may also be important for species protected under wildlife legislation; this is covered in the SCDC Biodiversity SPD".	Although wider vegetation would not fall within the remit of the Trees SPD, it would be considered as part of the Biodiversity SPD. As this paragraph is cross-referring to the Biodiversity SPD, it could usefully be added. The proposed amendments to paragraph 2.11 in response to representations 22156 and 22052 will address this issue.	No further change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22107 - English Partnerships and Gallagher Longstanton Limited	Object	<p>This paragraph refers to the Biodiversity SPD. Given this document is not yet available it is not possible to determine the impact of the policies in this document on the Trees SPD.</p> <p>Furthermore, English Partnerships and Gallagher wish to reserve the right to revisit comments on this document when the biodiversity SPD is published to ensure that complementary documents are adopted.</p>	<p>As such the document should be revised to make reference to 'emerging' SPD that will set out details of important species to be protected under wildlife legislation as this is a more accurate reflection of the position.</p>	<p>Supplementary Planning Documents cannot introduce new policy, rather they expand upon policies in the adopted Development Plan Documents. There is no need to amend the reference to the Biodiversity SPD within the text of the SPD to indicate that it is "emerging". The SPD is listed in Appendix 2 together with its status.</p>	<p>Ensure the status of SPDs listed in Appendix 2 reflects the latest position.</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>Chapter 3 - The Development Process</b>					
<b>3.1</b>					
22108 - English Partnerships and Gallagher Longstanton Limited	Object	<p>This indicates that the Standard (BS5387) recognises that trees are one of a number of design factors and that their retention should be balanced against new planting and the overall value that they will contribute to a development.</p> <p>Furthermore, BS5387 states that the presence of small trees (where these are less than 150mm stem diameter) '... should not be allowed to dominate site layout considerations'. Therefore whilst it is recognised that retention of trees within a development is a consideration this should be informed by the value of the trees on site, their effect on the masterplan and the wider design proposals including new planting.</p>	<p>As such English Partnerships and Gallagher request that paragraph 3.1 be revised as follows:</p> <p>'A good quality design cannot be achieved if the opportunities and constraints of a site are not identified and considered. Comprehensive site surveys will allow for key components of a site to be retained and will ensure that where appropriate new trees can be incorporated and existing trees protected.'</p>	<p>Agree the revised wording more closely reflects the aims of the British Standards and paragraph 3.1 should be amended accordingly.</p>	<p>Amend paragraph 3.1 to read:</p> <p>"A good quality design cannot be achieved if the opportunities and constraints of a site are not identified and considered. Comprehensive site surveys will allow for key components of a site to be retained and will ensure that where appropriate new trees can be incorporated and existing trees protected."</p>
<b>3.2</b>					
22109 - English Partnerships and Gallagher Longstanton Limited	Object	<p>Whilst existing trees can be an important factor that shapes development of a masterplan, it should be acknowledged that they are one of a number of opportunities and constraints that inform a design led process to deliver high quality design solutions. If undue emphasis is given to trees this could be at the expense of other factors, particularly if the different values of trees is not recognised. The SPD as worded implies that all trees, regardless of their value or contribution to the landscape, amenity or overall scheme design should be retained and that this is an absolute factor rather than part of a balanced consideration of the site's characteristics and the overall vision for the masterplan.</p>	<p>Accordingly, English Partnerships and Gallagher request that this paragraph is revised as follows:</p> <p>'Where there are existing mature trees, of high value (as defined by BS5837 (2005)), on a proposed development site consideration should be given to the incorporation of those trees in the overall layout of the development, particularly in public areas. Front elevations of buildings facing onto trees or proposed new planting must also be considered / addressed for the longevity of the enhancements that trees bring to development.'</p>	<p>Agree that trees are one of a number of factors that should be considered in the design process, and that whilst the Council would seek to retain and incorporate mature trees within the development, it should not be at the expense of good design. However, each site is different with varying opportunities and constraints, and in following industry guidance (BS5837 2005) an Arboricultural Implications Assessment will be undertaken. This will assess whether mature trees are worthy of retention and should be included within the design. Any design that does not incorporate such trees will need to be justified. Paragraph 3.2 could clarify this position, and should be reworded.</p>	<p>Amend paragraph 3.2 to read:</p> <p>"Where there are existing mature trees on a proposed development site careful consideration should be given to the incorporation of those trees in the overall layout of the development, particularly in public areas. Front elevations of buildings facing onto trees or proposed new planting must be well thought out for the longevity of the enhancements that trees bring to development."</p>

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22157 - Cambridgeshire County Council	Object	Planning Policy Statement 9 notes that "Local planning authorities should identify any areas of ancient woodland. 'Aged' or 'veteran' trees are particularly valuable, and their loss should be avoided. Planning authorities should encourage the conservation of such trees as part of development proposals."		The Council has identified areas of ancient woodland in the Biodiversity Strategy, together with measures to conserve them. The Council is also producing a Biodiversity SPD, which will also refer to veteran trees. It is not necessary to duplicate this information within the Trees SPD, however a cross-reference to the Biodiversity Strategy should be included. The proposed amendments to paragraph 2.11 in response to representations 22156 and 22052 will address this issue.	No further change.
22199 - Cambridge Preservation Society	Object	Unfortunately not only landscape architects design major spaces - thus it should state "Landscape Architects and other designers".	It should state "Landscape Architects and other designers".	Agree, amend reference to 'landscape architects' to 'landscape professionals'.	Amend the second sentence of paragraph 3.3 to read: "Landscape professionals are advised to consider sections 13 and 14 of BS 5837 2005; dealing with new planting, future requirements and relationships to development."
22110 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher note that this paragraph refers to the Landscape SPD providing guidance on site visits as invaluable to assessing a site prior to submission of any landscape scheme. The paragraph is not clear whether this is a reference to site visits by SCDC officers or by the applicant and as the Landscape SPD is not yet available it is not possible to cross reference the documents to gain clarity. As such the document should be revised to either provide clarity as to the intent of the final sentence or to remove the sentence and deal with the issue in the Landscape SPD when it is published.		There will inevitably some overlap between the Trees SPD and the SPDs covering Landscape and Biodiversity, as the issues can be indistinguishable. Paragraph 3.3 refers to landscaping issues for completeness and cross-refers to the Landscape SPD which will provide further guidance in these matters. There is no need to amend the Trees SPD to elaborate on matters that will be addressed in another SPD.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>3.4</b>					
22111 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 3.4 makes reference to landscape proposals and arboricultural information being presented by a 'competent arboricultural consultant'. Whilst it is agreed that arboricultural information should be prepared by such a consultant, landscape proposals are often produced by landscape architects or other designers, who are competent to produce these documents. BS5387 states that 'prior to commencing the topographical survey, it may be appropriate to seek the advice of an arboriculturalist to identify all trees that are relevant for inclusion in the survey'. However the Standard does not state the need for an arboriculturalist to undertake landscape proposals, although the introduction refers to the use of 'a competent person'.	Therefore, the reference to landscape proposals being prepared by an arboricultural consultant is inappropriate and the text should be revised as follows: 'Development proposals, where appropriate, should include landscape proposals and arboricultural information. The data and information should be clearly presented to allow the officer to make a concise and comprehensive assessment of the proposals.'	Paragraph 3.4 seeks to ensure that there is sufficient information on landscape proposals and arboricultural information, and that it is presented clearly for officers to be able to make an assessment on site. It is agreed that it need not be the arboricultural consultant who prepares this information, and this should be amended.	Amend paragraph 3.4 to read: "Development proposals should include landscape proposals and arboricultural information. The data and information should be clearly presented to allow the officer to make a concise and comprehensive assessment of the proposals."

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>3.9</b>					
22112 - English Partnerships and Gallagher Longstanton Limited	Object	The SPD should recognise that in some instances, particularly large scale developments, it will not be possible to submit details on all the trees. Reasons include the level of information that can reasonably be requested at the outline application stage, given the implications in terms of cost and time for preparing such detailed survey information, when the principle of development is yet to be established. Furthermore, where development is proposed that will be delivered over a number of years it should be recognised the value of trees will change. In this case it would be more appropriate to provide the information at the later stage when it would directly influence the detailed design of the scheme.	It is also noted that a caveat is included in the SCDC validation checklist as to why it may not be possible to include the information referenced in the draft SPD. For consistency it is requested that the SPD be revised to introduce the same wording as that included in the Validation Checklist.	Paragraph 3.9 states that when submitting planning applications it is important that all the required information and data relating to trees is provided. Paragraph 3.10 refers to submitting detail at an early stage in the process to allow evaluation of the losses, gains and requirements of a development. Paragraph 3.9 does not specify the level of detail or information required, which it is accepted will vary according to the type of planning application, development proposal and site. Paragraph 3.10 refers to the information required in paragraph 3.9. Neither paragraph is advocating the inclusion of detailed information with all planning applications, although it is important that sufficient information is provided to judge the impact of the proposed development. Paragraph 4.1 sets out the survey requirements and acknowledges that every development will be different in scale and complexity and that the survey requirements outlined may be required in part or full. As a result, there is already sufficient recognition within the SPD that the level of detail will vary accordingly. In addition, applicants are encouraged to contact the Council before submitting any planning application, and would be able to discuss what information is required to accompany the planning application, which will be determined on a case-by-case basis. There is therefore no need to add wording similar to that contained in the Validation Checklist.	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>3.12</b>	22171 - Great Shelford Parish Council	Object	Could there be a section 3.13 stating the protection of trees will be monitored regularly (PC could have a hand in this for example ensuring fences remain in place).	Conditions are often placed on planning applications, for example requiring landscaping schemes within a certain timeframe, and that any failures within a five year period from their planting will require replacements. As such, there is already a monitoring mechanism in place.	No change.

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b><i>Chapter 4 - Survey Requirements</i></b>					
<b>4.1</b>					
22113 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher request that the SPD is revised so that information on the types applications the requirements relate to is included, as it will provide clarity for applicants. This could include model conditions that will be used to secure the later submission of details that cannot be provided for example at the outline application stage.		Paragraph 4.1 sets out the survey requirements and acknowledges that every development will be different in scale and complexity and that the survey requirements outlined may be required in part or full. As a result, there is already sufficient recognition within the SPD that the level of detail will vary accordingly. It is not possible to foresee every eventuality and provide comprehensive information within the SPD, as each case is dealt with on its individual merits. The type of application will determine detail. It is recommended that a pre-site meeting or conversation is held with the appropriate officer before submitting any planning application. Such discussion can clarify details required, and at which stage, prior to any application being submitted.	No change.
<b>4.3</b>					
22114 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 4.3 states that a tree survey should be undertaken 'independently of proposals for the site'. This wording is considered to be superfluous and English Partnerships and Gallagher recommend that it be deleted.		Paragraph 4.3 refers to a tree survey being undertaken independently of proposals for the site to make it clear that the survey must consider all trees on, and where appropriate, adjoining the site and not just those which may be directly affected by the development proposals. The wording reflects that in BS5837 (2005), which states that "a tree survey should be undertaken by an arboriculturist and should record information about the trees on a site independently of and prior to any specific design for development."	No change.

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
<b>4.4</b>					
22115 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 4.4 states that it is not acceptable to include grouping of trees which will be affected by development proposals. Instead the SPD states that each tree must be individually plotted. This is regardless of whether the tree exists as part of a group, and in fact may be harmed if part of the group was removed.	It is requested that the bullet referring to group numbering be revised as follows: 'Group numbering will be acceptable where trees are growing together'.	Bullet point 3 of paragraph 4.4 states that group numbering is not acceptable where development is within the crown spread of an individual within the group, as group numbering would not enable individual trees to be identified. This is needed to distinguish between the impact from the development proposal on an individual tree and a group of trees. Bullet point 3 does state that group numbering may be acceptable where not directly affected by the development proposal, which provides some flexibility in appropriate circumstances. The wording reflects BS5837 (2005) which states that trees forming groups should be identified and considered as groups, however, an assessment of individuals within any group should still be undertaken if they are open grown or if there is a need to differentiate between them. For this reason it is acceptable where groups fall within development proposals to identify them individually so the trees can be assessed on individual or group merit.	No change.

  

<b>4.11</b>					
22116 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 4.11 makes reference to further information on the content of a Tree Constraints Plan being contained in Appendix 2. Appendix 2 contains contact details for various organisations and key national guidance it does not include further direct information.	As such it is recommended that the reference to Appendix 2 is deleted.	Appendix 2 includes relevant further information, including the Building Research Establishment's Site Layout planning for daylight and sunlight: a guide to good practice. Paragraph 4.11 could make it clear where this information can be found.	Amend the last sentence of paragraph 4.11 to read: "This information can be included on a scale plan or discussed prior to a planning application being submitted; further information can be found in Appendix 2 - National Information."

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<b>4.15</b>					
22117 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 4.15 refers to the preparation of an arboricultural implications assessment. As stated above an arboricultural implications assessment can only be provided at the detailed stage of applications and this should be reflected in the SPD.		Paragraph 4.15 refers to an Arboricultural Implications Assessment (AIA), which are included in the industry's best practice. It details what AIAs are required to include. It does not state that an AIA will be required with every planning application. Paragraph 4.1 acknowledges that every development site is different in scale and complexity and that the requirements detailed in the chapter will be required in part or full.	No change.
<b>4.16</b>					
22172 - Great Shelford Parish Council	Object	4.16, 4.17 and 4.18 Surely there should be some mention of the repercussions if trees are wilfully damaged and destroyed.		Agree it would be helpful to make clear that contravention of the legislation can result in legal action.	Insert the following text after paragraph 2.8: "Contravention of the statutory legislation relating to trees may result in the local planning authority taking legal action."
<b>4.21</b>					
22201 - Cambridge Preservation Society	Object	New Planting and Street Tree planting - this should provide a clear reference for developers and other site owners / managers to plant not just small trees but also substantial trees which are long-lived and of forest tree scale (e.g. oaks / beech / maple) and requiring more space to ensure long-term green and sustainable living benefiting local people and wildlife and adequate scale in view of taller buildings and features proposed.		Paragraph 4.21 already refers to new industry practice and materials to enable the establishment of trees within the built environment for longevity and so that they do not become a nuisance in their maturity. This should ensure that sufficient space is provided for their long-term growth. It is important that trees are suited to their environment and this can be dealt with at the landscape design stage. The Landscape SPD will provide further guidance on the sorts of trees that will be appropriate, therefore there is no need to add further detail in the Trees SPD.	No change.

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22158 - Cambridgeshire County Council	Object	We note that SPDs for Landscape and Biodiversity (pg17) are in preparation so it would appear that much of the landscaping and biodiversity detail will be provided in these and the implication is that this SPD needs to be read in conjunction with them. Whilst there is no need to repeat information, it would be helpful to provide a small section that gives some guidance on the most appropriate times of year for tree work and new planting. Within the tree work section a reference should be made on the need to consider breeding birds and bats, and the implications this might have. This can then be cross-referenced to the Biodiversity SPD.		Agree that it is important to consider existing biodiversity when undertaking new planting, and a note should be added to this effect. The Biodiversity and Landscaping SPDs will provide further guidance on this issue.	Add a note after paragraph 4.21 to read: "NOTE - Any tree works which are undertaken need to consider breeding birds and bats which are afforded statutory protection. Further information is provided in the Landscaping and Biodiversity SPDs."  Delete "For full details see SPD on Landscaping."
22173 - Great Shelford Parish Council	Object	It would be useful to include a section on the trees best suited to different sites. Often new developments have small ornamental trees and no forest trees. However the latter are very important in creating skyline detail in the long term. Developers should allow enough space to accommodate large trees.		It is important that trees are suited to their environment and this can be dealt with at the landscape design stage. Providing detailed guidance on the types of trees best suited to different sites is not appropriate, given each site and development proposal is treated on its individual merits. However the Landscape SPD will provide further information. Guidance on species of trees in keeping with the area and designing in trees to the built environment is given in the Cambridgeshire Design Guidelines and the Cambridgeshire Design Guide for streets and the public realm - Cambridgeshire County Council	Add the following into a new section 'Local Information' within Appendix 2 before 'National Information': "- Cambridgeshire Design Guidelines - Cambridgeshire County Council; - Cambridgeshire Design Guide for streets and the public realm - Cambridgeshire County Council"

<b>Representation No.</b>	<b>Nature</b>	<b>Representation Summary</b>	<b>Change To Plan Sought</b>	<b>Council's Assessment</b>	<b>Change To Draft SPD</b>
22118 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher note that reference is made to the Landscaping SPD at paragraph 4.21. Given this SPD is not yet available, appropriate references should be made to the document within the Trees SPD. Paragraph 4.21 deals exclusively with planting new trees, but references the Landscape SPD for 'full details'. Therefore if there are further details that are pertinent to including new trees within developments this information should be contained in the Trees SPD, not an as yet unpublished document. This approach would provide greater clarity to applicants. Accordingly English Partnerships and Gallagher request that the additional information be included and the reference to the Landscape SPD deleted.		There will inevitably be overlap between the Trees SPD and the SPDs on Biodiversity and Landscaping, as the issues coincide. However, it is not appropriate to include detailed landscaping information within the Trees SPD. Therefore reference to the Landscape SPD should be retained to direct the reader to the appropriate place to find further detailed information.	No change.