



South Cambridgeshire Local Development Framework

Affordable Housing
District Design Guide: High Quality and
Sustainable Development in South Cambridgeshire
Landscape in New Developments

Supplementary Planning Documents

Statement of Consultation

March 2010

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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):
- Affordable Housing
 - District Design Guide: High Quality and Sustainable Development in South Cambridgeshire
 - Landscape in New Developments
- 1.2 The SPDs have not been subject to a full Sustainability Appraisal as the parent policies in the adopted Development Plan Documents have been fully appraised and it is not possible for SPD to create new policy.
- 1.3 A Sustainability Appraisal and Strategic Environmental Assessment (SA / SEA) Statement has been prepared to this effect. The preparation of the SPDs has been subject to public participation in accordance with Regulation 17.
- 1.4 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 Statement took place between 23 October and 4 December 2009. The Council set up an interactive website to assist access to the documents and to facilitate making responses online.
- 2.2 A total of 318 representations were received on the SPDs. No representations were received to the Sustainability Statement. The breakdown of these representations is shown in the table below.

Breakdown of representations received to the SPDs:

SPD	Support	Object	Comment	Total
Affordable Housing	2	31	21	54
District Design Guide	40	42	103	185
Landscape	12	29	38	79

Summary of the main issues raised to the Affordable Housing SPD:

- More than half of the representations received are from the landowners / developers for the major developments, in particular Gallagher, Homes and Communities Agency and Marshall. They are seeking to ensure that the SPD properly reflects the issues affecting the major developments and that it is consistent with the affordable housing policies in the Area Action Plans. They also raise concerns with the proposals for dealing with development viability, including the proposed 3 year review period in cases where initial viability leads to a reduced affordable housing contribution, the requirement for developers to fund the independent validation of viability evidence, the approach to residual land valuation, and the requirement for the development to provide free serviced land.
- Questions are raised about the proposed indicative tenure mix targets and the approach to size of units, including from the County Council which is concerned that this could have implications for numbers of children on affordable housing developments.
- Cambridge City Council makes a number of detailed comments on the SPD, essentially seeking consistency in approach between the two districts where they felt clarifications would be helpful.
- A number of detailed points are made by other representors e.g. approach to rounding of affordable housing calculations, promotion of energy efficient design, delivery of rural exception sites.

Summary of the main issues raised to the District Design Guide SPD:

- Strong support for the SPD in general and to specific parts of it.
- Suggestions that the SPD could usefully include more illustrations of good and/or bad examples, provide clearer annotations on illustrations.
- Suggestions that the SPD would benefit from a slight restructure to improve clarity, remove duplication and reduce the length of the document to make it more user-friendly.

- Suggestions that more information be added on car parking, Green Infrastructure, and using design to promote sport and recreation should be included.
- Suggestions for more policy references to source policies in LDF documents, and for cross-references to adopted SPD.

Summary of the main issues raised to the Landscape SPD:

- Sustainable Urban Drainage Systems (SUDS) – several respondents noted that the references to SUDS were brief, and should be extended.
- Maintenance and Management - several replies noted that it was important that Maintenance (generally short term) and Management (Long term vision of the scheme) should be made distinct.
- Green Infrastructure - requests were made for further support for green infrastructure.
- Landscape examples - requests for examples of good and bad landscapes, and clarification of maps and drawings.
- Request for inclusion of reference to allotments.

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 The proposed changes to the SPDs and their impact on sustainability have been considered by the Council at a Planning and New Communities Joint Portfolio Holder meeting on 2 March 2010 as part of the process of formally adopting the revised SPDs.

Affordable Housing Supplementary Planning Document

Public Participation Report

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
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CHAPTER 1 INTRODUCTION TO THE SUPPLEMENTARY PLANNING DOCUMENT

1.1

26376 - East of England Regional Assembly (Paul Bryant) [6829]	Comment	<p>SCDC's 'Affordable Housing SPD' provides appropriate and detailed local guidance on the delivery of affordable housing. It includes an assessment of current need, reaffirms the Councils commitment to deliver 40% or more of all new dwellings as affordable, and discusses the use of rural exception policies. It also recognises that affordable housing should be well designed, well built, and that it should be delivered as part of sustainable, mixed-tenure developments. This SPD is consistent with regional policy, in particular, policies SS1, SS4, H2 and ENV7.</p> <p>The Regional Planning Panel Standing Committee considered a report at its meeting on 6 November 2009 before endorsing the recommendation that the Affordable Housing Supplementary Planning Document is in general conformity with the East of England Plan.</p>	Conformity with East of England Plan noted.	No change
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1.8

26391 - Natural England (Ms Janet Nuttall) [6952]	Support	<p>We support the aims and principles of this document in seeking to provide sustainable, inclusive and mixed communities. Natural England welcomes the proposal to ensure that new housing provides good places to live, with well-mixed and integrated communities and providing an appropriate balance between private and public open</p>	<p>Support noted. The SPD deals specifically with affordable housing provision and must be read alongside all other parts of the LDF. It is not necessary or appropriate to repeat other requirements of the LDF in this SPD. Other DPDs and SPDs deal with the provision of green infrastructure in new developments. There is therefore no need to include reference to the provision of green infrastructure in the document.</p>	No change
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>1.9</i></p> <p>26576 - Homes and Communities Agency (Mr Mark White) [2347]</p>	Object	Paragraph 1.4 states that the SPD will apply to the new town of Northstowe, to provide clarity on this issue, the SPD should include the text from Policy NS/7 (6) Affordable Housing, of the Adopted Northstowe Area Action Plan (NAAP) and should cross reference paragraphs D3.9 to D3.12 of the NAAP. This adopted policy provides the context for negotiations concerning the provision of affordable housing at Northstowe.	It is agreed that as the SPD applies to the major developments, the respective affordable housing policies from all the Area Action Plans, including that for Northstowe, should also be included in the SPD. As this will make the list of policies quite lengthy, the DPD extracts will be moved to an appendix. It is not considered necessary to include the supporting text for those policies in the SPD but they will remain relevant in the consideration of any proposals for those major	<p>Amend para 1.9 as follows:</p> <ol style="list-style-type: none"> 1. Revise last sentence to read: "The policies are set out in Appendix 1 for convenience." 2. Move the policies under paragraph 1.9 into new Appendix 1. 3. Renumber all appendices accordingly. 4. Add to the end of new Appendix 1 the following policies: <ul style="list-style-type: none"> - Northstowe AAP, Policy NS/7 (6) - Cambridge East AAP, Policy CE/7 (5) - (10) - Cambridge Southern Fringe AAP, Policy CSF/7 (5) - North West Cambridge AAP, <p>Amend para 1.9 as follows:</p> <ol style="list-style-type: none"> 1. Revise last sentence to read: "The policies are set out in Appendix 1 for convenience." 2. Move the policies under paragraph 1.9 into new Appendix 1. 3. Renumber all appendices accordingly. 4. Add to the end of new Appendix 1 the following policies: <ul style="list-style-type: none"> - Northstowe AAP, Policy NS/7 (6) - Cambridge East AAP, Policy CE/7 (5) - (10) - Cambridge Southern Fringe AAP, Policy CSF/7 (5) - North West Cambridge AAP,
26518 - Gallagher Estates (Mr Alan Joyner) [1606]	Object	The document states that the SPD will apply to the new town of Northstowe. The section commencing on page 2 under the heading 'SOUTH CAMBRIDGESHIRE LDF POLICY' should therefore include the full wording of 'Policy NS/7 (6) Affordable Housing', of the Adopted Northstowe Area Action Plan (NAAP) and should cross reference with paragraphs D3.9 to D3.12 of the NAAP, as the Policy has considerable importance for negotiations concerning the provision of affordable housing at	It is agreed that as the SPD applies to the major developments, the respective affordable housing policies from all the Area Action Plans, including that for Northstowe, should also be included in the SPD. As this will make the list of policies quite lengthy, the DPD extracts will be moved to an appendix. It is not considered necessary to include the supporting text for those policies in the SPD but they will remain relevant in the consideration of any proposals for those major	<p>Amend para 1.9 as follows:</p> <ol style="list-style-type: none"> 1. Revise last sentence to read: "The policies are set out in Appendix 1 for convenience." 2. Move the policies under paragraph 1.9 into new Appendix 1. 3. Renumber all appendices accordingly. 4. Add to the end of new Appendix 1 the following policies: <ul style="list-style-type: none"> - Northstowe AAP, Policy NS/7 (6) - Cambridge East AAP, Policy CE/7 (5) - (10) - Cambridge Southern Fringe AAP, Policy CSF/7 (5) - North West Cambridge AAP,

Representations***Nature Summary of Main Issue******Council's Assessment******Action******1.10***

26519 - Gallagher Estates (Mr Alan Joyner) [1606]

Object

Page 4 - Paragraph 1.10 - The meaning of 'affordable sites' in the 11th line of this paragraph is unclear. Is this meant to distinguish between private and public sector owned land for Gypsies and Travellers sites provision? Alternatively, is this a reference to Gypsy and Travellers sites being included within the affordable housing category of provision whether located on private or public sector owned land? The paragraph should be redrafted to make this clear. Also there is a superfluous duplicated 'which are' contained in the final sentence, which should

Line 11 of paragraph 1.10 is intended to distinguish between the way gypsy and traveller sites are provided which, as for housing for the settled community, can be funded and delivered by gypsies and travellers themselves on allocated land, ie. private sites, or provided as affordable housing with a subsidy and usually by RSLs, ie. affordable sites. The approach for the Gypsy and Traveller DPD recently consulted on included the option to allocate land at major developments, either as specific sites or as areas of search, which must be provided as part of the development. The GTDPD consultation also consulted on whether gypsy and traveller sites at major developments should be private or affordable sites. The issue of how the provision of land for gypsy and travellers by landowners at major developments is secured is a separate matter to be resolved through that DPD process.

Add the following to the end of the 5th sentence of paragraph 1.10: "..., ie. , funded and delivered by gypsies and travellers themselves on allocated land, or provided as affordable housing with a subsidy and usually by RSLs."

Representations**Nature Summary of Main Issue****Council's Assessment****Action****CHAPTER 2 HOUSING NEED****2.2**

26520 - Gallagher Estates (Mr Alan Joyner) [1606]

Object

Page 5 - Paragraph 2.2 - The Inspectors' report into the Development Policies DPD stated that " - -to make the policy clear and coherent and accord with national policy, there needs to be an explicit reference to viability in the policy - -" (Paragraph 7.7). This is a stronger statement than recognising the need to take account of financial viability of developments, which is referred to on page 5 at paragraph 2.2 of the Draft SPD which should therefore be amended to include the exact words used in the Inspector's report.

It is agreed that reference to the specific approach to affordable housing at the major developments should be added to the end of the paragraph to acknowledge the specific weight given to viability in respect of these

Add new sentence to the end of para 2.2 to read: "The Area Action Plans for the major developments at Northstowe, Cambridge East and Cambridge Southern Fringe, and the Site Specific Policies DPD policy allocating NIAB Extra, include an additional caveat making clear that these are major and complex developments, which have a wide variety of requirements covering infrastructure and services, and a balance may need to be struck between competing requirements, in the light of economic viability. For North West Cambridge AAP this specific additional caveat on viability is not added given the special nature of the development and the importance of addressing university needs, although the usual reference to viability is included.

2.6

26521 - Gallagher Estates (Mr Alan Joyner) [1606]

Object

Page 6 - Paragraph 2.6 - This paragraph should be amended to make reference to the increase in unmet need for affordable housing being largely due to the economic downturn and the collapse in the house building market. Reference should also be made in this paragraph to the policy guidance in Circular 05/2005 that planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision (Paragraph B9) and that this will constrain the ability to impose a requirement in future planning decisions to make up for previous unmet need for affordable housing.

This chapter deals with current evidence for housing need which continues to support the policies contained in the adopted DPDs. The SPD is not about reviewing the current affordable housing targets, but in providing supplementary guidance on how they will be implemented. It is not necessary or appropriate to include reference to planning obligations here.

No Change

Representations***Nature Summary of Main Issue******Council's Assessment******Action******2.7***

26347 - Steeple Morden Parish Council (Mr Tony Turner) [12759]

Comment We've found Housing Needs figures distorted by people putting their name on the Registers for several villages - quite understandably - in the hope of getting one. Feel there should be a software solution to identify those with a true local connection to each location, to make the needs figures more meaningful.

The overall district wide needs figures are quoted in paragraph 2.6 from the Strategic Housing Market Assessment (SHMA) which conforms to government guidance on its methodology and specifically excludes double counting. The purpose of paragraph 2.7 is to demonstrate that applicants have preferences and local connections in all locations across the district, based on the 2007 Housing Register, not to produce an overall figure of need across the district. If these local connections were totalled it would exaggerate the overall level of need as suggested by the Parish Council, which is why it is not done, relying instead on the approved SHMA methodology. Since the introduction of Choice Based Lettings (CBL, 2008) local preferences are no longer recorded. The needs figures included in the SHMA do not use either local connections or preferences.

No Change

*Representations**Nature Summary of Main Issue**Council's Assessment**Action***CHAPTER 3 PLANNING AFFORDABLE HOUSING PROVISION****3.6**

26522 - Gallagher Estates (Mr Alan Joyner) [1606]	Object	Page 8 - Paragraph 3.6 - This paragraph should be amended to include a reference to 'Policy NS/7 (6) Affordable Housing', of the Adopted Northstowe Area Action Plan (NAAP) and should cross reference with paragraphs D3.9 to D3.12 of the NAAP (See separate representations on paragraph 1.9).	It is appropriate to reflect the specific policy context for the major developments, which differs slightly from the district wide policy. As such, a new sentence should be added to paragraph 3.6.	Add new penultimate sentence to paragraph 3.6 to read: "The policy for the major developments reflects that they are major and complex developments which have a wide variety of requirements covering infrastructure and services and recognising that a balance may need to be struck between competing requirements in the light of economic viability."
26579 - Homes and Communities Agency (Mr Mark White) [2347]	Object	Paragraph 3.6 does not make mention of the particular circumstances of the new town of Northstowe which are addressed in adopted planning policy in the Northstowe Area Action Plan (NAAP) (also see HCA representations on paragraph 1.9). This paragraph should include a reference to Policy NS/7 (6) Affordable Housing, of the NAAP and should be cross referenced with paragraphs D3.9 to D3.12 of the NAAP which specify Northstowe's particular circumstances as a new settlement.	It is appropriate to reflect the specific policy context for the major developments, which differs slightly from the district wide policy. As such, a new sentence should be added to paragraph 3.6.	Add new penultimate sentence to paragraph 3.6 to read: "The policy for the major developments reflects that they are major and complex developments which have a wide variety of requirements covering infrastructure and services and recognising that a balance may need to be struck between competing requirements in the light of economic viability."
26218 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]	Object	If financial testing demonstrates that a level higher than 40% is appropriate, there is a need to bear in mind the discipline of achieving a balanced and mixed community. Levels above 40% for affordable housing, to which can be added between 20% and 30% of open-market housing made available for private renting, will undermine the achievement of a stable mixed and sustainable community. An indicative upper level should be	In view of the high level of housing need in the district and the role and function of the SPD, it is not considered appropriate to set an upper level of affordable housing provision, even an indicative one. The adopted DPDs do not set any upper limit. However, the adopted DPDs recognise the importance of achieving mixed and balanced communities and this is a matter that can best be considered in the context of a specific development	No Change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>3.7</p> <p>26349 - D H Barford & Co Limited (Mr Ian Taylor) [9048]</p>	Object	<p>The Council's intention to 'round up' the affordable housing requirement is unreasonable. The implication is that the Council will effectively be insisting on a 50% affordable housing requirement on developments of 2 dwellings.</p> <p>The intention to round up or down is inconsistent with the approach adopted by the Huntingdonshire Core Strategy Inspector who accepted a similar 40% target, but for this reason considered it should only apply to developments of 3 or more dwellings. Consequently developments of 3 dwellings are required to provide 1 unit, developments of 5 dwellings are required to provide 2 units, etc.</p>	<p>The key difference from the Huntingdon Core Strategy is that it includes a target of 40% affordable housing. The South Cambridgeshire policy target is 40% or more affordable housing. It is clear in the Inspectors' Report at paragraph 7.7 that they were allowing for the Council to seek a higher figure than 40% where it can be justified given the high level of need in the district. Also relevant on the issue of rounding is that at the time of the examination, the Council's submission draft policy was for 50% affordable housing with an approach to round down which would clearly have resulted in an affordable dwelling provided in a scheme of two.</p> <p>The Inspector changed the target to "40% or more" and retained the 2 dwelling threshold. The advice to the Inspector was that rounding down was the Council's practice at the time and it was not and is not captured anywhere in policy or guidance. We therefore needed to establish the protocol for implementing the adopted policy.</p> <p>The advice given to the Inspector, ie. a rounding down was in the context of the submission policy of 50% affordable housing where clearly we would have expected to see an affordable dwelling provided in a scheme of 2. The Inspector changed the target to "40% or more" and retained the 2 dwelling threshold.</p> <p>The advice to the Inspector was the Council's practice at the time, it was not and is not captured anywhere in policy or guidance. We therefore needed to establish the protocol for implementing the adopted policy. The Council now applies the normal mathematical approach to rounding, ie. where a calculation gives .5 or more it is rounded up and where it is less than .5 it is rounded down. Therefore a scheme of 2 dwellings at 40% affordable housing would give 0.8 which is rounded up to 1 affordable dwelling. As the policy is for 40% OR MORE and is subject to financial viability, it is consistent with the policy that if it is viable to provide an affordable dwelling on a site of 2 dwellings that it should be provided in view of the level of need. The SPD seeks to formalise that approach in a clear and transparent way.</p>	No Change

Representations***Nature Summary of Main Issue******Council's Assessment******Action******Tenure Mix for Affordable Housing***

26514 - Cambridgeshire County Council (Mrs Wendy Hague)

Comment The proposed proportion and mix of social housing represents greater provision of 'family-sized' social housing than in recent years. On average, social rented dwellings contain more children than market properties, and larger properties contain more children than smaller properties. Therefore developments with a higher proportion of social rented housing, and/or larger properties, will house higher numbers of children and require more sizeable education contributions. Overall, the affordable housing proportions and mixes in this SPD would result in child numbers towards the middle to upper end of the County's general range. Should the market housing mix be particularly skewed towards larger properties, child numbers could exceed even the upper end of the County's general range.

This SPD affects affordable housing only and not market provision. The principle is that the tenure mix and size of affordable dwellings should reflect the housing needs in the district. The tenure mix proposed in the SPD is the same as that sought in recent years. A target figure of 10% 1 bedroom homes provides a reasonable ratio to allow households starting a family the likelihood of transferring to larger accommodation and remaining in their local communities. Further, a higher proportion of 2 bed accommodation allows for trading down again within the community. Lastly, the allocations policies in operation allow couples to occupy 2 bed homes thus both meeting their aspirations and allowing for family growth. The 10% figure offers a compromise between the aspirations of couples/singles as evidenced by their purchase behaviour (3.21), overall needs figures and housing management issues. The SPD targets are consistent with recent negotiations concerning the Cambridge Southern Fringe. A limit on the number of 1 bedroom properties does not signal an intention for a greater proportion of large properties to be provided than in the past, but indicates that 2 bedroom properties are more flexible as smaller dwellings than 1 bedroom and it is not envisaged that this would significantly change the household mix in developments. Nevertheless, educational contributions should be negotiated based on the proposed mix for individual developments to best address identified needs as these are brought forward for planning permissions. It is for the County Council to monitor the child yield from new developments and ensure that it secures adequate contributions to provide for educational needs arising from development.

No Change

Representations***Nature Summary of Main Issue***

26523 - Gallagher Estates (Mr Alan Joyner) [1606]

Object Pages 8, 9 and 10 - Paragraphs 3.9 to 3.18 - These paragraphs should be amended to include a reference to D3.11 of the Adopted Northstowe Area Action Plan (NAAP) which states that the mix of affordable housing will be determined in response to identified needs at the time of the development.

Council's Assessment

The SPD must be read alongside other relevant parts of the Local Development Framework, including the Northstowe Area Action Plan. The SPD explains that the targets are consistent with the findings of the Strategic Housing Market Assessment 2008. The SHMA was published since the Development Control Policies DPD and the Northstowe Area Action Plan and provides evidence for the targets and supports the Council's practice over recent years. The figures included in the 2009 SHMA suggest a higher level of social rented housing. However, it is not considered that this can be regarded as providing a robust indication of long term needs given the current uncertainties in the housing market and therefore the 2008 figures are maintained. The SPD makes it clear that the tenure mix targets to apply district wide are the starting point for any negotiations and they are therefore not unduly prescriptive. Circumstances affecting individual developments will be a matter for the planning application process. In addition, a review mechanism for long term developments on major sites is proposed. This representation highlights that paragraphs 3.13 to 3.15 mix together the targets and justifications that will apply district wide and to the urban fringes. It is proposed to separate out the two sets of targets for clarification.

Action

Delete paragraphs 3.13 to 3.15 to read:
 3.13 The district wide targets for tenure mix in new affordable housing is 70% social rent and 30% intermediate housing. They are the appropriate targets because they:
 - conform to the needs identified in the Strategic Housing Market Assessment for at least the first 5 years covered by the study (SHMA May 2008- Source Chapter 30 Table 6);
 - respond to the greatest amount of need (rented housing) but still produce balanced sustainable developments;
 are close to the Council's current practice which has shown itself to be viable and deliverable.
 3.14 In sites which form part of the urban extensions to Cambridge, the starting point for negotiations will be amended to 75% rent and 25% intermediate housing. They are the appropriate targets because they:
 - are consistent with the targets contained in Cambridge City Council's Affordable Housing Supplementary Planning Document
 - are extensions to Cambridge and the targets for Cambridge are the most appropriate to apply to the whole urban extension, including parts within South Cambridgeshire.
 - mean that even in the largest developments the amount of rented housing will not exceed the amount shown to be sustainable in the largest local settlement, Cambridge City, in the recent past. It therefore follows a "precautionary approach", building on local circumstances.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
26582 - Homes and Communities Agency (Mr Mark White) [2347]	Object	These paragraphs should be rewritten to cross reference to Policy D3.11 of the Adopted Northstowe Area Action Plan (NAAP). This makes reference to the particular circumstances of Northstowe as a new settlement and states that the "mix of affordable housing will be determined in response to identified needs at the time of the development."	Noted. This objection is accommodated by the change proposed in relation to 26523 above.	3.15 The targets will be the starting point for negotiations on individual sites. Long term developments on major sites will have a review mechanism for the mix incorporated into the S106 No Change
<i>3.13</i> 26219 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]	Object	The split between social rent and intermediate tenure should be 50/50. That enables greater opportunities for key workers to purchase part of the equity. In these very challenging and prolonged circumstances of recession, the Cambridge area is one of the few nationally where ingredients for growth in the economy remain. Supporting that potential for growth in challenging economic times is made more compelling. Key workers, who generally aspire to house ownership, should be given more opportunity to gain access to intermediate tenures. Nevertheless, the review mechanism for major sites to consider housing mix is welcomed.	Support for the review mechanism is noted. The targets established here refer to district wide needs identified through the Strategic Housing Market Assessment (SHMA), and take account of the overall housing needs in the district and the appropriate mix for individual housing schemes to reflect that need whilst ensuring creation of mixed and balanced communities. Policy objective HG/a makes it clear that key workers are only one component of need. Key workers needs can be directly prioritised where appropriate through allocations policies rather than influencing the mix in a way that might provide more opportunities for them. Also, many key workers cannot afford intermediate tenures and require affordable rented homes.	No Change

Representations

Nature Summary of Main Issue

Council's Assessment

Action

3.15

Representations

26220 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]

Nature Summary of Main Issue

Comment More explanation should be introduced into the text to support the fourth bullet point dealing with the amount of rented housing which is claimed to be sustainable in Cambridge City. Clearly, from looking at various parts of the City, that figure will vary. For example, both the Abbey and Cherry Hinton Wards exhibit high levels of socially rented accommodation already. That will be a factor in addressing an appropriate level for Cambridge

Council's Assessment

This issue was addressed at the Cambridge East Area Action Plan examination. The Inspectors' Report concludes that "Existing housing areas near the urban extension are relatively disadvantaged areas in the Cambridge context. Even so, they are not particularly disadvantaged on a national scale. None of the adjoining housing areas have been identified for remedial action. The affordable housing at Cambridge East would in significant part be taken by households from South Cambridgeshire, where deprivation is even less than in the City. There are masterplanning solutions to the possible problem of over-concentrating poorer households, especially given the size of the urban extension. The effects of the actions of 'buy to let' investors will depend on several factors which are difficult to forecast" (paragraph 9.4). The AAP also makes clear that affordable housing will be distributed in small groups and clusters which would also assist with the creation of a mixed and balanced community. The need to avoid mono-tenure areas is also contained within the SPD via the clustering approach - paras 3.24 and 3.26. The AAP states that Cambridge East must provide an agreed mix of affordable housing. The SPD must be read alongside other relevant parts of the Local Development Framework, including the Cambridge East Area Action Plan. The SPD identifies targets for the urban extensions to Cambridge that are consistent with the Cambridge City Council Affordable Housing SPD. This recognises that the developments will form part of the built up area of Cambridge and that standards suitable for Cambridge are the most appropriate for the urban extensions. The SPD is also clear that the targets for affordable housing tenures are the starting point for negotiations and they are therefore not unduly prescriptive. Circumstances affecting individual developments will be a matter for the planning application process. In addition, a review mechanism for long term developments on major sites is proposed. This representation highlights that paragraphs 3.13 to 3.15 mix together the targets and justifications that will apply district wide and to the urban fringes. It is proposed to separate out the two sets of targets for clarification.

Action

Delete paragraphs 3.13 to 3.15 and replace to read:
 3.13 The district wide targets for tenure mix in new affordable housing is 70% social rent and 30% intermediate housing. They are the appropriate targets because they:
 - conform to the needs identified in the Strategic Housing Market Assessment for at least the first 5 years covered by the study (SHMA May 2008- Source Chapter 30 Table 6);
 - respond to the greatest amount of need (rented housing) but it still produce balanced sustainable developments;
 - are close to the Council's current practice which has shown itself to be viable and deliverable.
 3.14 In sites which form part of the urban extensions to Cambridge, the starting point for negotiations will be amended to 75% rent and 25% intermediate housing. They are the appropriate targets because they:
 - are consistent with the targets contained in Cambridge City Council's Affordable Housing Supplementary Planning Document
 - are extensions to Cambridge and the targets for Cambridge are the most appropriate to apply to the whole urban extension, including parts within South Cambridgeshire.
 - mean that even in the largest developments the amount of rented housing will not exceed the amount shown to be sustainable in the largest local settlement, Cambridge City, in the recent past. It therefore follows a "precautionary approach", building on local circumstances.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		East.		3.15 The targets will be the starting point for negotiations on individual sites. Long term developments on major sites will have a review mechanism for the mix incorporated into the S106
3.18 26524 - Gallagher Estates (Mr Alan Joyner) [1606]	Object	Page 10 - Paragraph 3.18 - Delete the words " - - contributing to the existing backlog of needs - -" as this is contrary to the policy guidance in Circular 05/2005 that planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision (Paragraph B9).	Government guidance on the needs that should be addressed in the Strategic Housing Market Assessment as contained in the Practice Guidance (draft guidance ODPM 2005 Chapter 5) clearly includes the backlog of needs (Chap 5 Stage 2) as well as newly arising need (Chap 5 Stage 3) However since the guidance does not use the term "backlog" but refers to "unmet current need" then for the avoidance of doubt the SPD should be amended to include the words unmet current needs instead of backlog.	Amend para 3.18 to read: "In determining the tenure mix on individual sites, a balance will be struck between new affordable housing contributing towards meeting unmet current needs, meeting newly arising needs, and at the same time forming sustainable mixed and balanced communities."
3.20 26525 - Gallagher Estates (Mr Alan Joyner) [1606]	Object	Page 10 - Paragraph 3.20 - The list of information sources to be used to ensure that the affordable housing to be provided meets local housing needs should be extended to include any analytical housing or demographic reports submitted by applicants in support of planning applications. SCDC is reminded of the Housing and Demographic Reports submitted with the outline application for Northstowe and the work undertaken on site specific demographics that is available. This was acknowledged in the Council's response to representations on the Draft 'Open Spaces in New Developments' SPD (Representation No: 22124) and a similar amendment should be made to the Affordable Housing SPD.	The representation to the Open Spaces in New Developments SPD was specifically in relation to population estimates that should be used for the application of the open space standards. It is not directly comparable to the situation here where the appropriate type and size of affordable housing is being determined and should be based on robust evidence of housing needs. Each planning application must be treated on its merits and if a developer were able to provide a case for the affordable housing types and sizes that is evidence based and can be demonstrated to be appropriate to the development concerned that may be acceptable. However, in most cases the housing register and local needs surveys will be the most robust evidence.	No Change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>3.21</i></p> <p>26222 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]</p>	Object	<p>The SHMA is the most up-to-date and extensive source of information on housing need. Elsewhere in the document it is used as an authoritative source. It is inappropriate to move away from its finding that around 30% of affordable homes should be for singles/couples. The reasons cited by the Council to justify a higher figure are not compelling, nor is there any indication why 30%</p>	<p>The Strategic Housing Market Assessment (SHMA) identifies overall need - it does not prescribe provision and para 2.5 of the draft SPD makes it clear that not all needs can be met, either now or in the foreseeable future. Further, the SHMA does not take account of aspirations as opposed to basic need, of the need to create mixed and balanced communities, or the distinction between special needs and general provision. A target figure of 10% small units provides a reasonable ratio to allow households starting a family the likelihood of transferring to larger accommodation and remaining in their local communities. Further, a higher proportion of 2+ bed accommodation allows for trading down again within the community. Lastly, the allocations policies in operation allow couples to occupy two bed homes thus both meeting their aspirations and allowing for family growth. The 10% figure offers a compromise between the aspirations of couples/singles as evidenced by their purchase behaviour (3.21), overall needs figures and housing management issues.</p>	No Change
<p><i>Layout and Distribution</i></p> <p>26526 - Gallagher Estates (Mr Alan Joyner) [1606]</p>	Object	<p>Pages 11 and 12 - Paragraphs 3.23 to 3.26 - These paragraphs do not make clear whether 'groups or clusters' refers to affordable housing of all types or solely to affordable housing tenures. The definition of 'Clusters' in the Glossary at page 49 is also unclear. Amendments are required to the text to clarify what is meant.</p>	<p>Policy HG/3 para 5 refers to affordable housing with no reference to specific tenures and it therefore refers to all affordable housing as defined in the LDF Paragraphs 3.25 and 3.26 in the draft SPD also refer simply to affordable housing with no distinction made between social rent and intermediate tenures and references to clusters therefore refer collectively to all affordable housing as defined in paragraph 3.2 of the draft SPD. The glossary also refers to affordable homes and therefore all affordable tenures are included.</p>	No Change

Representations**Nature Summary of Main Issue****Council's Assessment****Action****3.26**

26303 - Cambridge City Council (Mrs Emma Davies) [6069]

Comment To help with clarity of the document, it is felt that it would be useful to set out the City Council definition, including reference to flatted schemes.

Agreed. The only substantive difference between the Cambridge City SPD definition and the draft SCDC document concerns flatted developments which are not currently included in the SCDC text, and this can be

Revise second sentence of para 3.26 to read:
"The North West Cambridge Area Action Plan, prepared jointly with Cambridge City Council indicates that small groups or clusters may be between 6 and 25 dwellings, and in flatted schemes no more than 12 affordable dwellings should have access from a common stairwell or lift."

26224 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]

Object In dealing with the layout and distribution of affordable housing there needs to be flexibility, given the range of sites and the development time periods which will be relevant. At North-West Cambridge up to 25 dwellings in a cluster is indicated as being acceptable. In the urban extensions to Cambridge there is a need for a wider range of sizes than might be appropriate elsewhere on other smaller sites. Appropriate flexibility might be achieved by suggesting that clusters might achieve between 40 and 50 dwellings in appropriate circumstances.

The SPD proposes an approach that is consistent with that in the Cambridge City Affordable Housing SPD, reflecting that the parts of the urban extensions lying within South Cambridgeshire district will form part of the urban area of Cambridge. It therefore proposes that the appropriate size of a small group or cluster to inform discussions on the major developments is therefore between 6 and 25 dwellings. The SPD also makes clear that AAPs for the major developments other than North West Cambridge AAP say that the appropriate cluster size will be determined having regard to the location within the development and the type of housing being provided. This will be a matter for the planning application process.

No Change

3.27

26137 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]

Comment Would like to see more emphasis on energy efficiency in affordable housing by achieving code 6 and a return to Parker Morris standards. Too many new houses are built with inadequate storage space.

Any developing RSL who wishes to attract Homes and Communities Agency (HCA) grant to a development, needs to comply with the minimum Code of Sustainable Homes level 3 as set by the HCA. The HCA also detail the minimum floor areas required for property types. Code level 6 is zero carbon plus other requirements and is currently only achieved by demonstration projects. Government is intending moving to this level for all new development in 2016. Whilst the principle of pressing for sustainable design is supported, the Council is mindful that Parker Morris and level 6 would be so far above current requirements as to be financially unviable without a new grant regime.

No Change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.28 26393 - Natural England (Ms Janet Nuttall) [6952]	Comment	<p>The Natural England Access to Natural Greenspace Standards (ANGSt) standards as currently defined and recommended for adoption in PPG17: Planning for Open Space, Sport and Recreation, are:</p> <ul style="list-style-type: none"> * Every home should be within 300m of an accessible natural greenspace of at least 2ha plus; * At least 1ha of Local Nature Reserve should be provided per 1,000 population; * At least one accessible 20ha site within 2km; * At least one accessible 100ha site within 5km; * At least one accessible 500km site within 10km. 	The SPD deals specifically with affordable housing provision and must be read alongside all other parts of the LDF. It is not necessary or appropriate to repeat other requirements of the LDF in this SPD. Other DPDs and SPDs deal with the provision of green infrastructure in new developments. There is therefore no need to include reference to the provision of green infrastructure in the	No Change
26392 - Natural England (Ms Janet Nuttall) [6952]	Comment	We believe this SPD should make reference to the requirement and benefits of good quality, multi-functional green infrastructure as part of all new housing development. Green infrastructure is the network of protected sites, green spaces and linkages which provide for multi-functional uses relating to ecological services, quality of life and economic value. Green infrastructure should be delivered at all spatial scales from sub regional to local neighbourhood levels.	The SPD deals specifically with affordable housing provision and must be read alongside all other parts of the LDF. It is not necessary or appropriate to repeat other requirements of the LDF in this SPD. Other DPDs and SPDs deal with the provision of green infrastructure in new developments. There is therefore no need to include reference to the provision of green infrastructure in the	No Change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>3.30</i></p> <p>26225 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]</p>	Object	The reference to a meaningful proportion of homes, designed to lifetime mobility standards, needs to be refined on the basis of appropriate evidence.	The SPD refers to affordable housing only and not market housing. Many new affordable homes are already built to the Lifetime Homes standards which is a central government target and will be compulsory for all new affordable housing from 2011. There is a need to build much more inclusive and flexible housing to meet future demand in an ageing society. In particular, to build homes that will be adaptable enough to match a lifetime's changing needs. This can be achieved by building to Lifetime Homes Standards. Lifetime Homes Standards are inexpensive, simple features designed to make homes more flexible and functional for all. The Government intends that all public sector funded housing is built to Lifetime Homes Standards by 2011. They will also work closely with developers, architects, planners and other professionals to encourage take-up and to establish the most economic way to deliver the benefits of Lifetime Homes Standards. Lifetime Homes Standards will be made a mandatory part of the Code for Sustainable Homes to encourage progressively increased take-up in new build projects. The government's stated aspiration is that by 2013 all new homes will be being built to Lifetime Homes Standards.	No Change
<p><i>3.31</i></p> <p>26515 - Cambridgeshire County Council (Mrs Wendy Hague)</p>	Comment	It is noted that the intention that affordable housing within the District should meet a score of at least 12 against the Building for Life Criteria. As this requirement would need to be reported in the District Council's Annual Monitoring Report the County Council would welcome further discussions in relation to this issue (para 3.31).	The Council is willing to discuss the monitoring of this new national core output indicator with the County Council.	No Change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>3.35 26396 - Papworth Hospital NHS Foundation Trust (Mr Ken Brewer) [2513]</p>	Object	<p>Objection to paragraph 3.35 - it has the potential to restrict the opportunity of the provision of sheltered and age restricted accommodation coming forward, as planning applications for sheltered or age restricted accommodation would have to provide affordable housing. Given that the requirement for this type of accommodation is likely to increase in demand, based on the future demographic trends of the population, this approach could create issues regarding provision. Furthermore, it is considered to introduce a requirement which is not included in either the Core Strategy or the Development Control Policies documents.</p>	<p>This paragraph is not introducing any new requirements and is consistent with the Core Strategy and the Development Control Policy document which do not provide any exceptions for properties with an age restriction in terms of provision of affordable housing. This section of the SPD simply states that for the avoidance of doubt Policy HG/3 will apply to self contained residential accommodation with or without age restrictions or on site services, and will not apply to institutional use/care homes.</p> <p>A simple age restriction or provision of services does not affect the fundamental residential nature of the accommodation. It is accepted that there will be a growing need for accommodation suitable for older people based on demographic projections but this need includes households who will need affordable homes as well as people able to afford open market provision.</p>	No Change
<p>3.37 26226 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]</p>	Object	<p>There is welcome reference to the problems of co-ordinating delivery between open market and affordable housing. The solution suggested points to a legal agreement. However that is achieved there needs to be a form of words allowing flexibility. Until the recent financial turmoil, the thought would have been that the challenge of delivery lay more with affordable than with open market housing. Such is the depth of the current problem that there are certain circumstances where it is the delivery of open market housing rather than affordable which is problematic.</p>	<p>It is agreed that when the legal agreement is drawn up it needs to take account of a range of factors including issues around the delivery of market and affordable housing in the context of the site in question, it's characteristics, likely delivery timetable, and so on. It will need to provide as much certainty as possible along with</p>	No Change
<p>CHAPTER 4 DELIVERING AFFORDABLE HOUSING</p>				
<p>4.23 26304 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Comment	<p>We would recommend that this paragraph clarifies that Mortgagee in Possession clauses should only be included when an RSL is involved.</p>	<p>Agreed.</p>	<p>Add text to the end of paragraph 4.23 to read: "Mortgagee in Possession clauses will only be used in S106s when a Registered Social Landlord is involved with the project."</p>

Representations

Nature Summary of Main Issue

Council's Assessment

Action

CHAPTER 5 FINANCIAL MATTERS

Land Values for the Affordable Housing Element

26527 - Gallagher Estates (Mr Alan Joyner) [1606]

Object The requirement for free serviced land is inherently unsound and unlawful as it an unreasonable intervention in normal commercial negotiations between scheme promoters and RSL's or other affordable housing providers. The Council cannot dictate this requirement as it is contrary to Circular 05/2005 (Paragraph B35) and to PPS 3 (Paragraph 29) in that it is overly prescriptive, inflexible and does not allow for the most appropriate approach to delivering affordable housing to emerge taking into account the economic viability of each specific site. This requirement should therefore be deleted as it is vulnerable to judicial review if adopted.

The provision of free serviced land is not a requirement but an expectation based on current best practice and successfully concluded negotiations, particularly in relation to securing grant aid from the Homes and Communities Agency.
 This clause is compatible with PPS3 para 29 in that the overall target for affordable housing takes account of the likely level of developer contribution that can reasonably be secured (bullet point 1). Further, bullet point 5 in the PPS specifically requires the LDF to "Set out the approach to seeking developer contributions to facilitate the provision of affordable housing."
 This clause gives effect to that requirement by formalising this expectation based on agreements that have already been successfully negotiated and enacted.

No Change

Representations***Nature Summary of Main Issue******Council's Assessment******Action***

26529 - Gallagher Estates (Mr Alan Joyner) [1606]

Object Page 23 - Paragraphs 5.1 to 5.3 - It is entirely unreasonable and unjust to require a developer/applicant to pay for the costs of any independent advice needed by the Council to validate a viability appraisal submitted by an applicant. The Council as Local Planning Authority has a duty to determine planning applications and to bear the costs of so doing. Costs recovery is already provided for by means of the imposition of planning applications fees. This additional financial requirement has no statutory basis and is unlawful.

Although the representation from Gallagher Estates refers to paragraphs 5.1 to 5.3 of the SPD, the relevant reference to costs of independent advice needed by the Council is paragraph 5.8. Financial viability is recognised as a specialist area and the Council does not have that specialist expertise in-house. It is in this context that paragraph 5.8 provides that where the Council needs independent advice to validate a viability appraisal the reasonable costs of that validation will be met by the developer/applicant. It is not accepted that the recovery of costs is unreasonable and unjust and it is felt that paragraph 5.8 reflects an acknowledgement by the HCA in their Good Practice Note "Investment and planning obligations: responding to the downturn" (paragraph 32) that "it is common practice for developers to fund the cost of independent valuation". There would appear to be no reason why the developer cannot in its appraisal include an estimated figure for the reasonable costs of the Council taking independent advice to validate a viability appraisal. The Council knows of no cases where it has been established that recovery of such fees is unlawful. Developers have not successfully argued that the legal costs of the Councils (either in-house or external) in relation to negotiation of a Planning Agreement should be covered by planning application fees and a Consultant's advice to validate a viability appraisal is considered to be reasonably analogous to legal costs.

No Change

This principle applies equally to all applications regardless of the size of the development.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
5.4 26138 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Comment	The calculations involved seem detailed, time consuming and possible expensive. Would there be any scope for district councils to combine resources, as they will be dealing with many of the same developers, to achieve consistent and economic. valuations	Valuations will clearly vary from site to site dependent on the location of the site, nature of the proposal and range of obligations, however the methodology used to test viability should be consistent across sites. SCDC is currently in the process of seeking to put in place a framework agreement to secure viability expertise for a number of local authorities including Cambridge City Council, Cambridgeshire County Council and Cambridgeshire Horizons, which is intended to result in a more streamlined process for validating viability assessments provided by developers that seek to justify a departure from policy targets such as affordable housing. The cost of any such validation process should be bourn by the development, but is not intended to increase the overall development contribution as it is accepted that the cost of the validation should itself be treated as a further cost affecting viability in the same way as other accepted costs such as, for example, stamp duty.	No Change
26227 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]	Object	This and following paragraphs deal with viability. The document refers earlier to PPS3. Paragraph 29 advises that local planning authorities will need to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact on overall levels of housing delivery and creating mixed communities. There is no evidence of an informed assessment having been undertaken. Such an assessment of the 40% or more proportion needs to be set in circumstances which are current today in relation to housing land values.	The affordable housing target of 40% or more is established in the adopted Development Control Policies DPD. It is for the SPD to supplement the DPD and it cannot review the target, even if the Council accepted that there was a case to do so, which it does not. There remains a high level of housing need in the district, the policy applies to the plan period to 2016, and it includes a viability test to ensure that the level of affordable housing sought is reasonable in the case of a particular development taking account of circumstances at the time of determining a planning application. Paragraph 5.14 also makes clear that the Council will be prepared to review and renegotiate the affordable housing contribution if it considers that the applicant/developer has made a sound case.	No Change
26439 - Cambourne Parish Council (Mr John Vickery) [2376]	Support	Chapter 5 should not be amended as it allows the percentage to be reduced if 40% is not financially viable as this allows for the relative priority of other planning considerations and the need to achieve mixed and balanced communities to be taken into account.	Noted.	No Change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>5.5 26528 - Gallagher Estates (Mr Alan Joyner) [1606]</p>	Object	Page 23 - Paragraph 5.5 - The statement that "This will require a full economic appraisal of the costs of development and of returns etc - " is too prescriptive and should be amended to state " - - The Council will encourage a full economic appraisal etc etc - - -"	Paragraph 5.5 confirms that there will be a presumption that the development will include full and appropriate provision for affordable housing unless it is demonstrated that it cannot be provided at a rate of 40% or more of the dwellings in a development. Paragraph 5.5 then goes on to confirm that the onus is on a developer to demonstrate that viability would be jeopardised by this level of provision. If the developer wishes to demonstrate that viability would be jeopardised, a full economic appraisal will	No Change
<p>5.8 26228 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]</p>	Object	In circumstances where planning application fees for the major urban extensions to Cambridge will be up to £125,000 for outline applications, and £250,000 for each reserved matters application, there is no justification for those applicants to be burdened with costs which are properly borne by the Council.	The costs referred to will generally only arise where a developer argues that viability would be jeopardised by a level of provision of 40% or more as affordable housing. Financial viability is recognised as a specialist area and the Council does not have that specialist expertise in-house. It is in this context that paragraph 5.8 provides that where the Council needs independent advice to validate a viability appraisal that seeks to justify a departure from policy targets such as affordable housing, the reasonable costs of that validation will be met by the developer/applicant. It is not accepted that the recovery of costs is unreasonable and unjust and it is felt that paragraph 5.8 reflects an acknowledgement by the HCA in their Good Practice Note "Investment and planning obligations: responding to the downturn" (paragraph 32) that "it is common practice for developers to fund the cost of independent valuation". There would appear to be no reason why the developer cannot in its appraisal include an estimated figure for the reasonable costs of the Council taking independent advice to validate a viability appraisal. The Council knows of no cases where it has been established that recovery of such fees is unlawful. Developers have not successfully argued that the legal costs of the Council (either in-house or external) in relation to negotiation of a Planning Agreement should be covered by planning application fees and a Consultant's advice to the Council to validate a viability appraisal is considered to be reasonably analogous to legal costs. This principle applies equally to all applications regardless of the size of the development.	No Change

Representations***Nature Summary of Main Issue******Council's Assessment******Action******5.9***

26305 - Cambridge City Council
(Mrs Emma Davies) [6069]

Comment While this paragraph is consistent with the City Council's Affordable Housing SPD, of particular importance in relation to the reference to the valuation of the site being of its existing use and not its hope value, there are some concerns with the wording "the profit margin required by the developer". It is not always appropriate to accept the developer's profit margin in viability modelling.

The phrase used in the draft SPD is the same as that used in the Cambridge City Affordable Housing SPD at paragraph 42. However, it is agreed that the SPD would be better with an alternative wording, allowing for a reasonable profit for the developer, which may or may not be the level of profit that they seek.

Revise paragraph 5.9 first sentence to read:
"...including required contributions to local services and infrastructure, the provision of affordable housing and a reasonable profit margin to the

26230 - Marshall of Cambridge
(Holdings) Limited (Mr Stephen
Sillery) [664]

Object The reference to reasonable costs should include business relocation costs.

The Cambridge East Area Acton Plan makes clear at paragraph D4.13 that South Cambridgeshire and Cambridge City Councils are mindful of the significant infrastructure requirements of building a new urban quarter and of the need to relocate Cambridge Airport and some businesses to facilitate redevelopment. There is no need to repeat this in the district wide SPD.

No Change

Representations

26530 - Gallagher Estates (Mr Alan Joyner) [1606]

Nature Summary of Main Issue

Object Page 24 - Paragraph 5.9 - Use of the term 'residual land value basis' is entirely unclear and is not defined in the glossary at the end of the document. It is completely unreasonable to disregard the actual purchase (or land acquisition) costs in a viability appraisal and this issue was a matter for closing submissions by Robin Purchas QC at the recent planning appeal by Countryside Properties for the Clay Farm and Glebe Farm sites at Cambridge within Cambridge City Council's administrative area. The whole of paragraph 5.9 should either be deleted or amended to take these points on board.

Council's Assessment

The use of Residual Land Value models as appraisal tools is established practice. The Inspectors' Report into the Development Control Policies DPD specifically identified the Grimley model used by the Housing Corporation/HCA as a vehicle for making viability assessments more "open and objective." They noted - "Such models should enable sensible variations around the 40% to be negotiated on an objective basis, thus making the policy a positive tool for achieving the optimum level of affordable housing provision. (para 7.7)

Residual land value is defined as - "The residual valuation is the value of the site once the cost of the development and the developer's return for risk and profit have been subtracted from the value of the development. In other words, the residual land value is the amount the developer should bid/pay for the land." Also - "If the site is allocated in the LDF this residual site value should then be compared with the market value of development land in the local area. If the residual land value is below the market value then the developer may well consider that the scheme is unviable" (page 28 of the HCA's Economic Appraisal Tool - User Manual: http://www.homesandcommunities.co.uk/public/documents/HCA_Economic_Appraisal_Tool_User_Manual_v2.0.pdf)

Viability is therefore firstly tested against local market values. The reason existing or last use value is also considered is to ensure that sites with alternative uses are properly assessed for viability and not unreasonably burdened with requirements that are not viable. As the HCA appraisal states - "For brownfield sites, it is also critical to compare the residual land value to the existing use value of the site, particularly if there are physically sound and occupiable buildings. If the residual land value is lower than the existing use value then the development would not be considered to be viable and may not proceed."(page 28). This approach is the same as that adopted by Cambridge City Council Affordable Housing SPD and therefore there is no conflict on sites which straddle their boundaries with SCDC.

Draft para 5.9 does not state that purchase price will be disregarded but that the appraisal should include a valuation based on existing or last use value taking into account all reasonable costs. The purchase price will be a factor providing that it corresponds to market value for development land. Although Residual Land Value is a term in common usage in relation to these matters it is accepted that a definition could usefully be added to the glossary and the explanation contained in the Homes and

Action

ADD the following definition to the Glossary: Residual Land Value
- The residual valuation is the value of the site once the cost of the development and the developers return for risk and profit have been subtracted from the value of the development. In other words, the residual land value is the amount the developer should bid/pay for the land.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
26440 - MCA Developments Limited [3652]	Object	Financial appraisals to evaluate the viability of development proposals should not be based on existing or last use land values, rather the actual purchase price paid. Should a policy of assuming only existing use value be adopted, such a provision would fatally disincentivise landowners and developers from being able to develop in South Cambs for residential purposes as there would be no economic incentive for	<p>Communities Agency Economic Appraisal Tool User Manual (page 28) is proposed.</p> <p>The use of Residual Land Value models as appraisal tools is established practice. The Inspectors' Report into the Development Control Policies DPD specifically identified the Grimley model used by the Housing Corporation/HCA as a vehicle for making viability assessments more "open and objective". They noted - "Such models should enable sensible variations around the 40% to be negotiated on an objective basis, thus making the policy a positive tool for achieving the optimum level of affordable housing provision (para 7.7). Residual land value is defined as - "The residual valuation is the value of the site once the cost of the development and the developer's return for risk and profit have been subtracted from the value of the development. In other words, the residual land value is the amount the developer should bid/pay for the land." Also - "If the site is allocated in the LDF this residual site value should then be compared with the market value of development land in the local area. If the residual land value is below the market value then the developer may well consider that the scheme is unviable."(page 28) http://www.homesandcommunities.co.uk/public/documents/HCA_Economic_Appraisal_Tool_User_Manual_v2.0.pdf Viability is therefore firstly tested against local market values. The reason existing or last use value is also considered is to ensure that sites with alternative uses are properly assessed for viability and not unreasonably burdened with requirements that are not viable. As the HCA appraisal states - "For brownfield sites, it is also critical to compare the residual land value to the existing use value of the site, particularly if there are physically sound and occupiable buildings. If the residual land value is lower than the existing use value then the development would not be considered to be viable and may not proceed."(page 28). This approach is the same as that adopted by Cambridge City Council Affordable Housing SPD and therefore there is no conflict on sites which straddle their boundaries with SCDC.</p>	No Change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>5.11</i></p> <p>26306 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Comment	Reference should be made to seeking external funding in advance of considering varying the mix and tenure.	<p>Whilst it is accepted that external funding will be a consideration in judging financial viability, the reference to "seeking" external funding in advance is potentially confusing. The most common source of external funding is the Homes and Communities Agency and recent experience suggests that the timing and methods of accessing their funding cannot be easily predicted. The Councils clear intention in conducting any negotiation is that all aspects of financial viability are considered and a balanced view of the availability of external funds are part of this equation whether or not a formal "bid" has been made, or is possible, for funds at the time of negotiation. Policy HG/3 para 4 identifies the availability of subsidy as a factor in the determination of the mix of tenures and house sizes.</p>	No Change
<p><i>5.12</i></p> <p>26307 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Comment	We have concerns that the wording of this paragraph could be seen to be too prescriptive. If it is accepted that 40% affordable housing is not viable at the time of determining the application, there may be other ways to ensure that this does not apply to the whole development.	<p>This mechanism allows the Council the flexibility to review the initial percentage of affordable housing specified in a S106 Agreement in the case of development built out over a lengthy period, particularly the major developments and developments coming forward in times of difficult market conditions. This allows for changes/increases in grant that may be forthcoming from the HCA or even Cambridgeshire Horizons. It is considered to be a reasonable and appropriate approach to dealing with changes in market conditions, which can be particularly important in the context of major developments that will be built over a long period of time during which it can be expected that will be fluctuations in market conditions. See also response to 26237.</p>	No Change

Representations***Nature Summary of Main Issue******Council's Assessment******Action***

26531 - Gallagher Estates (Mr Alan Joyner) [1606]

Object A requirement for continuous 3 year reviews of affordable housing provision for major developments is completely unworkable as the degree of uncertainty and risk created to the viability of a scheme will seriously impede the ability to fund the cost of the strategic infrastructure necessary for the commencement of development. This represents the introduction of new policy and is outside the proper scope of an SPD which is restricted to provide greater detail on the policies in DPD's. The review requirement, if adopted, would inhibit the delivery of both market and affordable housing provision and should therefore be deleted.

Although it is suggested that "a requirement for continuous 3 year reviews of affordable housing provision for major developments is completely unworkable as the degree of uncertainty and risk created to the viability of a scheme will seriously impede the ability to fund the cost of the strategic infrastructure necessary for commencement of development " the Respondent's comments omit to point out that paragraph 5.12 only deals with circumstances where an initial percentage of less than 40% (affordable housing) is agreed. In these circumstances for the majority of sites where financial viability is not an issue in relation to the provision of 40% affordable housing there will be no issue for the purposes of impeding the ability to fund the cost of the strategic infrastructure necessary for the commencement of development.

No Action

In those cases where the initial appraisal shows that 40% affordable is not viable then it is not unreasonable that there should be review periods such that if the market improves and the balance of the land to be developed at the time of the review is more viable (i.e. such that a higher percentage of affordable housing can then be justified) a higher percentage is then provided (including provision to cover a shortfall of less than 40% on an earlier part of the development) The critical point , however, is that the percentage on review will not go above a 40% threshold, irrespective of any earlier shortfall, unless the viability is such that the increase can be fully justified.

It is felt that paragraphs 5.13 and 5.14 are reasonable and recognise that circumstances can deteriorate as well as improve. For example it identifies a scenario where planning permission was granted for a particular proportion of affordable housing on the assumption that Social Housing Grant would be available but that by the time the development commences this proves not to be available.

Similarly paragraph 5.14 provides that where evidence of exceptional circumstances is provided that threaten the delivery of the scheme, the Council will consider negotiation for the provision of a lower proportion of affordable homes or for a number of built units with no additional public subsidy as the affordable housing contribution. But again recognising that circumstances may improve, it provides that if there is agreement for example as to the initial provision of a lower proportion of affordable homes, the S.106 Agreement would include provision for further reviews every 3 years where the

Representations

26237 - Marshall of Cambridge (Holdings) Limited (Mr Stephen Sillery) [664]

Nature Summary of Main Issue

Object Paragraphs 5.12, 5.13 and 5.14 introduce a three-yearly review mechanism for Section 106 agreements. This will generate substantial problems in securing development finance for major sites. Lenders will need to fully understand the value of the asset into which they will be investing over a period. The percentage of affordable housing is a principal determinant of value. A three-yearly review will bring much uncertainty to the possible investment, hampering delivery. The problem can be overcome by an indication that any review will be downwards only in relation to the proportion of affordable housing.

Council's Assessment

Although it is suggested that paragraphs 5.12, 5.13 and 5.4 introduce a three-yearly review mechanism for Section 106 Agreements, the Respondent omits to point out that paragraph 5.12 only deals with circumstances where an initial percentage of less than 40% (affordable housing) is agreed. For the majority of sites where financial viability is not an issue in relation to the provision of 40% affordable housing, there will be no necessity of three yearly review and therefore there will not be an issue affecting for the purposes of securing development finance being secured for major sites.

In those cases where the initial appraisal shows that 40% affordable is not viable then it is not unreasonable that there should be review periods such that if the market improves and the balance of the land to be developed at the time of the review is more viable (i.e. such that a higher percentage of affordable housing can then be justified), a higher percentage is then provided (including provision to cover a shortfall of less than 40% on an earlier part of the development). The critical point, however, is that the percentage on review will not go above a 40% threshold, irrespective of any earlier shortfall, unless the viability is such that the increase can be fully justified, in which case development finance will not be adversely affected on the basis that if viability does not justify 40% or more affordable housing, it will not be required, and indeed the review could suggest a lower figure.

It is felt that paragraphs 5.13 and 5.14 are reasonable and recognise that circumstances can deteriorate as well as improve. For example, it identifies a scenario where planning permission was granted for a particular proportion of affordable housing on the assumption that Social Housing Grant would be available but that by the time the development commences this proves not to be available.

Similarly paragraph 5.14 provides that where evidence of exceptional circumstances is provided that threaten the delivery of the scheme, the Council will consider negotiation for the provision of a lower proportion of affordable homes or for a number of built units with no additional public subsidy as the affordable housing contribution. The Council's normal practice is to also consider the potential to amend the tenure mix to assist viability and this should be added to paragraph 5.14. But again recognising that circumstances may improve, it provides that if there is agreement for example as to the initial provision of a lower proportion of affordable homes,

Action

Revise 2nd sentence of paragraph 5.14 to read:
"Where evidence of exceptional circumstances is provided that threaten the delivery of the scheme, the Council will consider negotiating a different tenure mix or for the provision of a lower proportion of affordable homes or for"

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>5.23</i></p> <p>26533 - Gallagher Estates (Mr Alan Joyner) [1606]</p>	Object	<p>Page 27 - Paragraphs 5.23 to 5.26 - The references to 'free serviced land' and the cost of independent valuation advice being paid for by the developer/land owner/applicant should be deleted (See separate response to Page 23 - Paragraphs 5.1 to 5.3 and Page 23 - Paragraphs 5.1 to 5.3 for justification).</p>	<p>the S.106 Agreement would include provision for further reviews every 3 years where the development is not completed within a 3 year period.</p> <p>The issue of the developer funding independent valuation advice is addressed in response to the objector's separate representation 26529.</p> <p>The provision of free serviced land is not a requirement but an expectation based on current best practice and successfully concluded negotiations, particularly in relation to securing grant aid from the Homes and Communities Agency.</p> <p>This clause is compatible with PPS3 para 29 in that the overall target for affordable housing takes account of the likely level of developer contribution that can reasonably be secured (bullet point 1). Further, bullet point 5 in the PPS specifically requires the LDF to "Set out the approach to seeking developer contributions to facilitate the provision of affordable housing."</p> <p>This clause gives effect to that requirement by formalising this expectation based on agreements that have already been successfully negotiated and enacted.</p>	No Change
<p><i>5.29</i></p> <p>26516 - Cambridgeshire County Council (Mrs Wendy Hague)</p>	Comment	<p>It is considered that a reference to national indicators may be helpful in providing context.</p> <p>The model S'106 template whilst helpful should be sufficiently robust to withstand changing circumstances. It may be appropriate to indicate other stakeholders as other parties, particularly given the established joint working on fringe sites.</p> <p>Likewise it is expected that contributions to services and infrastructure may be made via other mechanisms in the near future.</p>	<p>Noted. It is agreed that Section 106 agreements need to reflect changing circumstances in appropriate circumstances and will be negotiated accordingly.</p>	No Change

Representations***Nature Summary of Main Issue******Council's Assessment******Action******CHAPTER 6 RURAL EXCEPTION SITES******6.1***

26441 - Eltisley Parish Council
(Mrs Gail Stoehr) [1147]

Comment Eltisley Parish Council appreciates that South Cambridgeshire District Council is under pressure and direction from Central Government areas such as exception sites but feels that SCDC could be constructive in its methods and include Parish Councils in these areas more as happened in the past.

Every opportunity must be taken by South Cambridgeshire District Council to ensure that Parish Council's are fully involved in every step of the process.

SCDC has established an Exception Site Parish Review meeting to which all parishes have been invited to attend and the first meeting was held in January 2010. The purpose of the group is to scrutinise the working of the exception sites policy as contained within policy HG/5 of the Development Control Policies DPD. This is an opportunity to work with parish councils and to help them maximise delivery of exception sites. The Strategy and Development and Enabling Team does work with parish councils throughout the inception of exception sites. Usually this is a joint partnership between the PC, SCDC, RSL and Cambs ACRE.

No Change

6.7

26313 - Cottenham Parish
Council (Mrs Julie Groves) [692]

Comment Notwithstanding its support for an excellent document this Council nevertheless feels that the conditions described in paragraph 6.7 are, when read in conjunction with Government's Planning Policy Guidance Note 3: Housing Update, unnecessarily oppressive.

The SPD's approach is to provide for exceptions sites within and adjoining villages. This is consistent with Policy HG/5 of the Development Control Policies DPD which requires an exception site to adjoin a village, be well related to the built-up area of the settlement and also to be well related to services and facilities within the village. This approach was found to be sound by the public examination Inspectors. It also seeks to be as consistent as possible with the principles of sustainable development which the Council applies in the identification of suitable sites for wider residential development, in particular accessibility to services and facilities and to public transport. The accessibility to services and facilities is a key issue and the SPD could be clearer on the importance of this criteria, which will be relevant where the share of a village framework may result in some sites that are adjoining the framework being considerable distance from village services and facilities and therefore potentially unsuitable as an exception site.

Add the following to the end of the second sentence of paragraph 6.7:
"...and be reasonably accessible

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>APPENDIX 2 - PPS3: DEFINITION OF AFFORDABLE HOUSING</i>				
<i>APPENDIX 2 - PPS3: DEFINITION OF AFFORDABLE HOUSING</i>				
26517 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	The definition of affordable housing as set out in Appendix 2 may need to acknowledge policies within the City Council's DPD/SPDs.	Noted. The definitions in appendix 2 are taken from PPS3 and the explanations of affordability in section 4 are either identical to, or broadly comparable to, the definitions adopted by the City with slight differences where information from the SHMA indicates differences between Cambridge City and SCDC which should be taken into	
<i>APPENDIX 3 - MODEL SECTION 106 CLAUSES</i>				
<i>APPENDIX 3 - MODEL SECTION 106 CLAUSES</i>				
26310 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Delivery Mechanism - It may be appropriate to include more options within this definition. In larger developments, clauses 19, 20 and 21 could apply within each phase. Clause 19 requires clarification.	This is a model S106 and is provided as a starting point and is intended as a guide only to be amended as necessary in the context of specific planning applications.	No Change
26308 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Definition of Affordable Housing - no reference is made either here or in paragraph 3.3 of the draft SPD to other types of tenure approved by the Council, as included within the Southern Fringe S106s.	Our definition is intended to be flexible and not specific to enable us to respond to new and emerging tenure types to meet those with specified housing needs.	
26309 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Definition of Affordable Housing Land - for larger developments, it is not always possible to know at outline approval (and S106) stages the precise areas of land to be used for Affordable Housing. Provision could be made here for the option of Affordable Housing Land to be identified through an Affordable Housing Scheme for each phase.	Noted. It is acknowledged that not all clauses will be appropriate for all sites and alternatives can be formulated where appropriate.	No Change

District Design Guide: High Quality and Sustainable Development in South Cambridgeshire

Supplementary Planning Document

Public Participation Report

CHAPTER 1 INTRODUCTION TO THE SUPPLEMENTARY PLANNING DOCUMENT

CHAPTER 1 INTRODUCTION TO THE SUPPLEMENTARY PLANNING DOCUMENT

Representations

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CHAPTER 1 INTRODUCTION TO THE SUPPLEMENTARY PLANNING DOCUMENT

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<p>26455 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]</p>	<p>Comment The structure of the document would benefit from a slight restructure</p> <p>Part I Geology, Topography & Historical Context Part II Basic Design Criteria Part III Major Developments Part IV Smaller Scale Developments</p> <p>All images and Photos require image reference and Labelling</p>	<p>Agree, the SPD would benefit from a slight restructure, as follows:</p> <ul style="list-style-type: none"> - Part I Local Context (Chapters 1 & 2) - Part II Design Principles (Chapters 4 - 11 but with revisions) - Part III Procedures and Applications (Chapter 19) <p>(Part III from the consultation draft SPD will be subsumed into a restructured Part II, incorporating a number of revisions to the order of the text and removal of duplication across chapters.)</p> <p>Agree all illustrations should be clearly annotated.</p>	<p>Restructure and reorder the document into three parts, removing duplications as follows:</p> <ul style="list-style-type: none"> - Part I Local Context (Chapters 1 & 2) - Part II Design Principles (Chapters 4 - 11 but with revisions) - Part III Procedures and Applications (Chapter 19) <p>(Part III from the consultation draft SPD will be subsumed into a restructured Part II, incorporating a number of revisions to the order of the text and removal of duplication across chapters.)</p> <p>Ensure all illustrations are clearly annotated.</p>
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.1</i>				
26374 - East of England Regional Assembly (Paul Bryant) [6829]	Comment	<p>The stated purpose of this SPD is to ensure the delivery of sensitively and appropriately designed, sustainable developments. It sets out design principles based on recognised good practice and explains the key requirements that the Council will be taking into consideration when considering planning proposals. The areas covered by this SPD are both broad and comprehensive, ranging from consideration of landscape and historic built forms, environmental health issues, building and disability regulations, and environmental sustainability. This SPD is consistent with regional policy, in particular, policies SS1, ENV1, ENV6 and ENV7.</p> <p>The Regional Planning Panel Standing Committee considered a report at its meeting on 6 November 2009 before endorsing the recommendation that the District Design Guide Supplementary Planning Document is in general conformity with the East of England Plan.</p>	Noted	No change
<i>1.2</i>				
26434 - Great Shelford Parish Council (Mrs Wenda Burbidge) [1887]	Support	<p>This is a well laid out, comprehensive and well detailed document which will be useful to all users of the planning system. It is a considerable improvement on the original design guide and will be useful to us as a Parish council as we will be able to use the information provided to back up our decisions on planning applications. We will also be able to refer neighbours to it so they are able to understand aspects such as overlooking and therefore hope paper copies, when it is approved, will be available in our local library.</p> <p>We congratulate the authors on the work that has gone into it.</p>	Support noted. The Council has recently contacted all the local libraries to understand whether there is public demand to view paper copies of planning policy documents in the libraries and whether they would be willing to have copies of them. Note - the documents are currently made available to view at libraries on CD-Rom and on the Council's website: www.scamb.gov.uk/ldf .	No change
26213 - Cottenham Parish Council (Mrs Julie Groves) [692]	Support	<p>Cottenham Parish Council supports this document. The draft DDG introduces geology, morphology and topography, then outlines sustainable policy (ref DCPDPD 2007), documents current/past architectural trends and village morphology. Then details best practice, mitigation and guidelines with reference to the Disability Act, Environmental Health and Sustainability. All written in all a very positive and comprehensive draft, with which one has no quibbles.</p>	Support noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.3</i> 26397 - Papworth Hospital NHS Foundation Trust (Mr Ken Brewer) [2513]	Object	In general the SPD is considered to be unduly prescriptive. While the provision of advice to ensure the delivery of sensitively and appropriately designed proposals is supported, the 'wordiness' of the document make it more difficult to use. We would also suggest that much of its content is already covered adequately in a number of other documents. We would suggest that part 1 of the SPD could be deleted or provided as an appendix	Part 1 of the document leads on to later parts as well as including design context and principles. The document is lengthy but has a wide scope and brings together a number of important subjects which should influence design. Covering these subjects and approaches in one place is an advantage. It is proposed to restructure the SPD (see response to Representation 26455).	The clarity and accuracy of the text has been reviewed and improvements made to Chapters 2 and 3 and other parts of the document.
<i>1.5</i> 26238 - Cambridge City Council (Mrs Emma Davies) [6069]	Support	We strongly support the creation of this document to encourage the delivery of sensitively and appropriately designed, sustainable developments within the district.	Support noted	No change
<i>1.8</i> 26243 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	As the document is a design guide, it should aim to illustrate best practice principles in a visual form rather than with text. The document could also usefully contain illustrations of what constitutes good and bad design, with captions illustrating which is which. Not only will the inclusion of more illustrations help to reduce the size of the document, but illustrations can provide essential clarification of spatial issues that people may find difficult to understand. Equally illustrations can inspire developers to conquer challenges of modern development, rather than leaving them stuck for creative solutions.	Agree, more illustrations should be included.	Include more illustrations, with clear annotations.
26492 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	The County Council welcomes the environmental sustainability principles and requirements set out in Chapter 11 of the Design Guide. However it is suggested that it would be helpful to include references to the policies relating to water and energy efficiency in the Development Control Policies DPD as well as those in the adopted Area Action Plans where specific environmental sustainability standards or targets are identified (para	The introduction to the SPD includes two overarching policies on sustainability and design from the Development Control Policies Development Plan Document which apply district-wide, including in the major development areas covered by Area Action Plans (unless they include their own location-specific policies). The introduction provides a broad overview and introduction to the whole Design SPD. Rather than provide a long list of policies in the introduction, it would be more appropriate for the chapters which cover topics in more detail to include	Incorporate policy references within the relevant chapter(s).

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
26214 - Cottenham Parish Council (Mrs Julie Groves) [692]	Support	<p>This document is rather wordy, perhaps by repetition they aim to re-enforce the message. However it is comprehensive in both general principles and the details required.</p> <p>There is nothing controversial providing one agrees that development should enhance the landscape and environment. The effect on wildlife, biodiversity, and SuDs is covered.</p> <p>It explains why a landscape scheme is needed, how to construct and present a scheme and details required drawings.</p> <p>A useful, but brief, section goes into aspects of the different Cambridgeshire landscapes in order to inform applicants of what they need to fit in with.</p> <p>There are some photographs showing good and bad landscaping but it would benefit from an appendix giving more of these.</p>	Support noted	No change
26403 - Mr Steve Terry [12785]	Support	<p>Overall this is a welcome document and will hopefully raise the quality of design in the district.</p> <p>Part 1 provides a very useful contextual framework to development in the villages. However, the photographs should identify whether or not the illustrations are good or bad examples.</p>	Support noted. Agree the illustrations should be clearly annotated.	Ensure all illustrations are clearly annotated.

Representations***Nature Summary of Main Issue******Council's Assessment******Action******1.9***

26241 - Cambridge City Council
(Mrs Emma Davies) [6069]

Comment We are concerned that the document is overly long and that this may hamper the accessibility and usability of the document. It is felt that some of the detail could be removed, particularly where this is taken from other supporting documents. The document could also usefully contain a 'users guide' up front, so that readers can direct themselves easily to the sections that are relevant

The document is lengthy but has a wide scope and brings together a number of important subjects which should influence design. Covering these subjects and approaches in one place is an advantage.

Chapter 1 will introduce the layout of the document and how it should be used.

Add a new paragraph after 1.15 to read:

The SPD is divided into three sections:

* Part I Local Context - describes the characteristics of South Cambridgeshire and how these should influence the design of new development.

* Part II Design Principles and Criteria - covers general approaches to design, appreciating and responding to context, different locations, types and scales of development, and the elements of design. It also outlines how design should deal with environmental sustainability, biodiversity and environmental health issues, and national legislation and standards.

* Part III Procedures and Applications - describes the documentation, such as site appraisals, concept diagrams and design and access statements, that is likely to be needed to show the design process and explain and support proposals and planning applications.

The SPD includes a number of Appendices, including useful contacts, addresses, and reference material, as well as further detail on a number of issues covered within the SPD.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
26377 - Natural England (Ms Janet Nuttall) [6952]	Support	Natural England supports the overall concept and objectives of this SPD to ensure delivery of sensitively and appropriately designed, sustainable developments and setting out important design principles based on recognised good practice. We also welcome the aim to help applicants achieve an attractive, sustainable, well designed, high quality environment that integrates housing, employment and community uses, together with infrastructure and green areas in conjunction with the	Support noted	No change
<i>1.10</i>				
26140 - Mrs Katherine Heydon [2799]	Support	FOR: strongly support policy DP/1 Sustainable Development. COMMENT: in entirety, with particular regards to sustainability, drainage, housing density, flood/climate change mitigation and travel policy.	Support noted	No change
25582 - Anglian Water Services Limited (Mrs Amie Lill) [10900]	Support	Thank you for giving Anglian Water the opportunity to comment on this consultation. We support the criteria listed that applicants are expected to take account of, in particular the importance of incorporating water conservation measures into developments, the adaptation to the impacts of climate change and the use of Sustainable Urban Drainage Systems (SUDs).	Support noted	No change
26381 - Natural England (Ms Janet Nuttall) [6952]	Support	We welcome the section on Sustainable Urban Drainage Systems under Chapter 1, including the reference to opportunities for biodiversity enhancement. We would welcome a general reference to the multi-functional uses of SUDS, such as the provision of green infrastructure for public access, as well as biodiversity.	The introduction to the SPD includes copies of two overarching policies on sustainability and design from the Development Control Policies Development Plan Document which apply district-wide. These are adopted policies, therefore it is not possible to amend their text. There is already a reference in paragraphs 11.61 and 11.66 to the incorporation of open space and maximizing opportunities for the enhancement of biodiversity, but it would be useful to elaborate in paragraph 11.66.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>1.11</i></p> <p>26437 - Bassingbourn cum Kneesworth Parish Council (Mr Mike Hallett) [12769]</p>	Object	Policy DP/2 Design of New Development does not adequately address the conservation of the built heritage of the area. We consider that the text of policy DP/2 paragraph 1.b. should be expanded to read "Conserve or enhance important built heritage and environmental assets of the site;"	The introduction to the SPD includes copies of two overarching policies on sustainability and design from the Development Control Policies Development Plan Document which apply district-wide (Policies DP/1 and DP/2). These are adopted policies, therefore it is not possible to amend their text. There are a number of other policies in the adopted Development Plan Documents that address conservation issues (and the other topics covered by the SPD) in more detail, but have not been replicated in the SPD. The Council has already adopted separate SPDs on Listed buildings and Conservation Areas, which do not need to be replicated within the Design SPD.	No change
26142 - Mrs Katherine Heydon [2799]	Support	<p>Policy DP/2 Design of New Development.</p> <p>FOR: a), COMMENT: strongly support the use of the word 'enhance' which allows for evolved and modern architecture in addition to historical or pastiche design.</p> <p>FOR: c), COMMENT: strongly support the use of 'variety and interest' to encourage a diverse/varied streetscene and mixed-housing styles.</p> <p>FOR: e), COMMENT: strongly support 'permeable', interconnected routes of roads, cycleways, bridleways and footpaths.</p> <p>FOR: g), COMMENT: strongly support a 'mix of housing types including smaller homes'.</p>	Support noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>CHAPTER 2 THE DESIGN CONTEXT</i>				
<i>2.5</i>				
26456 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Figure 2.1 would benefit from some reference points on the plan e.g. significant settlements, major transport links and rivers.	Noted but not considered necessary.	No change
<i>2.8</i>				
26457 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Figure 2.2 would benefit from some reference points on the plan e.g. significant settlements, major transport links and rivers.	Noted but not considered necessary.	No change

Representations***2.10 - Prehistoric***

26493 - Cambridgeshire County Council (Mrs Wendy Hague)

Nature Summary of Main Issue

Comment The section on historical development makes reference to a focus for prehistoric settlement on lighter soils, particularly the gravel terraces. However it is important to note that, research fieldwork over the past decade has demonstrated a denser level of settlement throughout the district in the prehistoric periods. An example of which is the fieldwork undertaken in conjunction with the Cambourne development and the A428 road improvements which demonstrate that large tracts of the claylands, previously considered unviable to sustain settlement prior to the Roman period, were in fact intensively utilised from at least the Iron Age (para 2.10).

Council's Assessment

Accepted

Action

Reword paragraph 2.10 as follows:

"In Palaeolithic and Mesolithic times the area was occupied by hunter-gatherers, when much of the area that was later to become fen was then above sea level, so could also support the more transient societies in a heavily wooded landscape. It was the rise in sea level that accompanied the melting ice-cap at the end of the last Ice Age that led to periodic flooding and the development of the fenland areas. In Neolithic times communities became more settled as an agrarian based society started to develop. These early communities especially established themselves on the chalk grasslands around the Icknield Way, along the river valleys and fenland edge, and on the lighter soils associated with the Greensand. The development of these communities continued through the Bronze Age and into the Iron Age, by when farming had become so well developed that huge tracts of land were covered by ditched fields and enclosed homesteads, especially in areas of gravel subsoil, but also in the heavier clay areas where developments in agricultural technology produced ploughs capable of working the heavier soils."

*Representations**Nature Summary of Main Issue**Council's Assessment**Action***CHAPTER 3 VILLAGE LANDSCAPE AND SETTLEMENT ANALYSIS****CHAPTER 3 VILLAGE LANDSCAPE AND SETTLEMENT ANALYSIS**

26378 - Natural England (Ms Janet Nuttall) [6952]	Support	We welcome the use of Landscape Character Assessment as a basis for identifying key characteristics to be preserved and/or enhanced. We particularly support the implementation of suitable design principles including retention, creation and enhancement of green areas and implementation of appropriate planting schemes. These are likely to be multi-functional and provide a range of benefits including public access, enhancement of biodiversity and even benefiting climate	Support noted	No change
3.11				
26458 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.11 Labels around the photo should connect to those elements of the photo they are identifying.	Accepted	Clarify the annotations to the photograph at paragraph 3.11.
3.13				
26459 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.13 Trees and Hedgerows Mixed woodland Reference should be made to the status of this woodland is it typically, natural semi-natural ancient etc.	Reference requested would give a greater degree of detail than is appropriate here.	No change
3.14 - Design Principles				
26460 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.14 Design Principals 9th bullet: "Ensure large barns are sited and designed to minimise their bulk and impact on the wider landscape, normally relating them to existing groups of farm buildings. Prominent ridgeline sites should be avoided." As this is referring to agricultural buildings and planning permission is often not required this point seems problematic as it would be difficult to ensure this is abided to. A farmers guide to the planning system gives guidance in appendix B on permitted development rights and agricultural buildings. Link below: http://www.communities.gov.uk/documents/planningandbuilding/pdf/143516.pdf	The text is appropriate for design principles which apply more widely than development which requires planning permission.	No change

Representations

Nature Summary of Main Issue

Council's Assessment

Action

26461 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment 10th Bullet:
"Avoid the use of standardised and intrusive urban materials,..."

The use of materials, street furniture, lighting and signage as part of the traffic calming measures, will often be dictated by the County highways authority if these are to be adopted and signage would typically need to conform to current regulations if these signs were implemented it would result in there invalidity upon the public highway making them unenforceable. Therefore, the use of non standardised materials is often not acceptable.

Amend bullet -

"Where possible development... should avoid the use of standardised and intrusive urban materials, street furniture, lighting and signage as part of traffic calming measures."

Accepted.

Change text to 10th bullet of paragraph 3.14 to read:
"Avoid the use of standardised and intrusive urban materials, street furniture, lighting and signage as part of traffic calming measures wherever appropriate."

3.15 - Landscape Character

26462 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment The descriptions within this paragraph give two distinct different character areas and should be separated into two separate areas e.g.

"i. This character area is a broad scale landscape of large fields, low trimmed hedgerows and few trees. Certain high points have small beech copses which form strong focal points, and there are occasional shelterbelts around settlements.

ii. The eastern part of the area is cut through by the valleys of the rivers Granta and Rhee, which have an intimate character of small grazing meadow and wet woodlands, with lines of willows along the rivers. Some historic parkland within these valleys also adds to their distinctive character."

The character areas were taken from a Countryside Commission landscape character assessment and are

No change

3.16

26463 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment Paragraph 3.16
Labels around the photo should connect to those elements of the photo they are identifying.

Accepted.

Clarify the annotations to the photograph at paragraph 3.16.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.19 26435 - Great Shelford Parish Council (Mrs Wenda Burbidge) [1887]	Comment	Clay bat has only one 't' (paras 3.19, 3.53 & 13.3).	Accepted.	Correct the typographical error in paragraphs 3.19, 3.53 & 13.3.
3.21 - Design Principles 26465 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	14 bullet: "Ensure new agricultural buildings" As this is referring to agricultural buildings and planning permission is often not required this point seems problematic as it would be difficult to ensure this is abided to. A farmers guide to the planning system gives guidance in appendix B on permitted development rights and agricultural buildings. Link below: http://www.communities.gov.uk/documents/planningandbuilding/pdf/143516.pdf	The text is appropriate for design principles which apply more widely than development which requires planning permission.	No change
26464 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.21 13th Bullet: "Avoid the use of standardised and intrusive urban materials, street furniture, lighting and signage as part of traffic calming measures." The use of materials, street furniture, lighting and signage as part of the traffic calming measures, will often be dictated by the County highways authority if these are to be adopted and signage would typically need to conform to current regulations (The Traffic Signs Regulations & General Directions Act 2002) if these signs were implemented it would result in there invalidity upon the public highway making them unenforceable. Therefore, the use of non standardised materials is often not acceptable.	Accepted.	Change text to 3.21 to read: "Avoid the use of standardised and intrusive urban materials, street furniture, lighting and signage as part of traffic calming measures wherever appropriate."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>3.22 - Landscape Character</i>				
26466 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.22 "...Occasional medium to large sized ancient woodlands provide a distinctive feature and church spires are key landmarks..."</p> <p>The reference to large sized ancient woodlands is misleading and should be rephrased to woodland blocks, which is a more accurate description:</p> <p>"...Occasional medium to large sized ancient woodland blocks provide a distinctive feature and church spires are key landmarks..."</p>	Don't accept that the existing text is misleading or that the proposed change is a meaningful improvement.	No change
<i>3.23</i>				
26467 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.23 Labels around the photo should connect to those elements of the photo they are identifying.</p>	Accepted.	Clarify the annotations to the photograph at paragraph 3.23.
<i>3.24 - Settlement Character</i>				
26468 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.24 The images illustrating typical character do not typify the strong linear form which is identified within the paragraph above suggest different images are used.</p>	The plans do not illustrate a strong, linear form.	Change text to 3.24 to note that many of the villages have a strong, linear form, as follows: "Many of the villages have a strong, linear form with rows of cottages and a few, larger farmsteads facing roads and
<i>3.25</i>				
26469 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.25 4th bullet... buildings are typically arranged in a loose knit pattern. This is contrary to the description given in paragraph 3.25 which describes a strong linear form with rows of cottages and a few larger farmsteads facing roads and paths.</p>	There is not necessarily a contradiction between linear forms and loose knit patterns.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>3.28 - Design Principles</i>				
26471 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.28 Bullet 8 mentions agricultural buildings As this is referring to agricultural buildings and planning permission is often not required this point seems problematic as it would be difficult to ensure this is abided to. A farmers guide to the planning system gives guidance in appendix B on permitted development rights and agricultural buildings. Link below:	The text is appropriate for design principles which apply more widely than development which requires planning permission.	No change
26470 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.28 Bullets 7 Bullet 7 mentions standardised urban material . The use of materials, street furniture, lighting and signage as part of the traffic calming measures, will often be dictated by the County highways authority if these are to be adopted and signage would typically need to conform to current regulations (The Traffic Signs Regulations & General Directions Act 2002) if these signs were implemented it would result in there invalidity upon the public highway making them unenforceable. Therefore, the use of non standardised materials is often not acceptable.	Accepted	Change bullet point 7 of 3.28 as follows: "Avoid unnecessary straightening and widening of narrow country lanes and the use of standardised and intrusive urban materials, street furniture, lighting and signage as part of traffic calming measures wherever appropriate."
<i>3.31 - Settlement Character</i>				
26472 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.31 Illustration of Gamlingay "Gamlingay - Crossroads location - Continuous frontages - Houses and cottages mostly on back edge of pavement" The above statements do not completely correspond with the illustration and should therefore be rephrased to state: "Gamlingay - Crossroads location - Continuous frontages along Church Street - Houses and cottages mostly on back edge of pavement"	Accept point and highlight that principle applies especially to Church Street and parts of Mill Street.	Clarify the annotations to the photograph at paragraph 3.31.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>3.35 - Design Principles</i>				
26473 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.35 4th Bullet</p> <p>"Ensure buildings normally face the back edge of the pavements and are arranged to form mostly continuous frontages, with only occasional gaps, giving glimpses of countryside beyond."</p> <p>This statement is only applicable for development along Church Street and elements of Mill Street and is not applicable to the majority of the rest of the settlement.</p>	Accept point and note that this is one of the local patterns that should be followed.	<p>Change 4th bullet of 3.35 to read:</p> <p>"Ensure buildings are positioned to reflect local patterns such as mostly continuous frontages running along the back edge of pavements with only occasional gaps, giving glimpses of</p>
26474 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Bullets 7 & 8</p> <p>See comments for Paragraph 3.14 re standardised urban material and agricultural buildings.</p>	<p>Urban materials - accept point</p> <p>Agricultural buildings - the text is appropriate for design principles which apply more widely than development which requires planning permission.</p>	<p>Urban materials - change 7th bullet point of 3.35 to read:</p> <p>"Avoid the use of standardised and intrusive urban materials, street furniture, lighting and signage as part of traffic calming measures wherever appropriate."</p> <p>Agricultural buildings - no change.</p>
<i>3.36 - Landscape Character</i>				
26475 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.36</p> <p>Labels around the photo should connect to those elements of the photo they are identifying.</p>	Accepted	Clarify the annotations to the photograph at paragraph 3.36.
<i>3.38 - Settlement Character</i>				
26532 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.38</p> <p>Illustration</p> <p>"Willingham - Continuous frontages at back of pavement"</p> <p>The layout of this settlement does not entirely support the above statement</p>	Accept point and note that there are groups of buildings on or close to the back of the pavements in the village core.	Clarify the annotations to the illustration at paragraph 3.38.

Representations

Nature Summary of Main Issue

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Action

3.42 - Design Principles

26534 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment Paragraph 3.42
Bullets 8 & 9 See comments for Paragraph 3.14 Re use of standardised urban material and agricultural buildings.

Urban materials - accept point
Agricultural buildings - the text is appropriate for design principles which apply more widely than development which requires planning permission.

Urban materials - change last bullet of 3.42 to read:
"Avoid the use of standardised and intrusive urban materials, street furniture, lighting and signage as part of traffic calming measures wherever appropriate."

Agricultural buildings - no change.

3.69

26535 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment Paragraph 3.69
The use of the phrase 'vernacular buildings' is a very broad heading Is this the correct term as it is appearing after a statement regarding mid 17th and 18th century windows.

It might also be useful if such statements appeared in chronological order to avoid any confusion and provide a description of what is meant by vernacular buildings for example "the way in which ordinary building (typical dwellings) were or are locally constructed, prior to the importation of different building techniques and styles."

The vernacular reference is appropriate here in relation to side-hung or sliding sash windows.

No Change

3.77 - Doors

26536 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment Paragraph 3.77
Left hand image gives an example of a planked door however, this is an internal door and should be replaced with a photo of an external door to be consistent with other examples.

There is more emphasis on external doors in this section but it is valid to include internal doors here.

Change text to caption (3.77) to note door is internal.

3.93

26537 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment Paragraph 3.93
"The earliest buildings have simple rectangular forms with single room depth plans. A few highest status buildings have aisles to increase the internal volume and later more commonly cross-wings are incorporated..."

Change highest to high

Accepted.

Change "highest" to "high" in paragraph 3.93.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.94 26538 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.94 "Many traditional cottages follow a 'baffle entry' form, in which there is a central chimney stack (usually with two fireplaces back to back) and the main entry..." Insert chimney for clarification	Accepted.	Insert the word "chimney" before "stack" in paragraph 3.94.
3.95 26539 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.95 Would benefit from a diagram illustrating Double Pile Plan Form	Change is desirable but not essential.	No change made given time constraints.
3.99 26541 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.99 "The Listed Buildings SPD (Chapter 15, pages 119 - 126) highlights specific building types within South Cambridgeshire. These include farm buildings including barns, granaries, stables, dovecotes, and cart and stock sheds. The importance of food processing, as well as agriculture, to the district is reflected by mills and maltings. Traditional crafts and industries are represented by smithies and tanneries. Bake houses and wash houses, schools and war memorials are also included." Chapter 15, pages 119-126 is incorrect in the adopted SPD and should be changed to 123-130 War memorials are not building types and are memorials, whilst they appear in the Listed Buildings SPD this differentiation should be noted within this SPD.	Accepted.	Amend 1st sentence of paragraph 3.99 to read: "The Listed Buildings SPD (Chapter 15, pages- 123-130) highlights specific types of buildings and structures within South Cambridgeshire."
3.104 26542 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.104 "...The presence of vents and slats in a farm building gives an indication that animals were kept in it." This is a misleading statement as vents are also found in barns that were used for crop storage to enable air to circulate thus reducing the chances of crops rotting whilst stored.	Accepted.	Amend last sentence of paragraph 3.104 to read: "Vents or slats in a farm building indicate that it housed animals or stored produce."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.108 26543 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.108 "Parish churches were centres of the village with the building and churchyard used for a range of community and other activities."</p> <p>This statement says that churches and churchyards were traditionally used for a range of community activities. Is there evidence for this because as consecrated ground non religious uses would be very limited? Is this being confused with church halls which were introduced to cater for these other non-religious uses?</p>	Historically, parish churches were used for a range of activities.	The first sentence of paragraph 3.108 is revised to clarify this point, as follows: "Parish churches were centres of the village and historically the building and churchyard could be used for a range of community and other activities."
3.114 26545 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.114 "The sheer size of a building is important but this is most often read and measured in relation to , other buildings or features. The relative size of buildings and their parts is called scale."</p> <p>Delete: sheer Insert: its surroundings</p>	Accepted.	Amend first sentence of paragraph 3.114 to read: "The size of a building is important but this is most often read and measured in relation to other buildings or features."
3.117 26546 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.117 "Different proportions also give a building (or building element) a stronger or weaker vertical or horizontal emphasis. Buildings with strong horizontal proportions can be seen as hugging the ground while those with strong vertical proportions take the eye up to the sky."</p> <p>Insert strong before horizontal proportions and vertical proportions as all building have horizontal and vertical proportions and this statement is about the emphasis or quality of these proportions.</p>	Accepted.	Amend paragraph 3.117 to read: "Different proportions also give a building (or building element) a greater or lesser vertical or horizontal emphasis. Buildings with strong horizontal proportions can be seen as hugging the ground while those with strong vertical proportions take the eye up to the sky. The elements and details of a building can reinforce or play against these overall emphases. For instance, the walls of many traditional buildings have a horizontal emphasis but the windows can often have a vertical emphasis."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.118				
26548 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.118 "The proportions of the plans footprint of buildings (the relationship of length to depth) and the proportions of cross sections (height to depth) are important..." Replace plans with footprint to avoid confusion	Clarification would be beneficial.	Replace "plans" with "floor plans" in 3.118.
3.134				
26549 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.134 "The way buildings sit are positioned on plots makes a significant difference to their settings and the way they are perceived and to sense of space and character..." Replace: sits with are positioned	Accept	Replace "sits" with "are positioned" in paragraph 3.134.
CHAPTER 4 ENVIRONMENTAL SUSTAINABILITY				
CHAPTER 4 ENVIRONMENTAL SUSTAINABILITY				
26550 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Chapter 4 Remove this Chapter and put information at the front of the Chapter 11 as it is covered in detail.	Noted and agreed	Incorporate Chapter 4 into the beginning of Chapter 11.
26246 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Chapters 4 and 11 could usefully be merged so that all sustainability matters are dealt with in one section.	Noted and agreed	Incorporate Chapter 4 into the beginning of Chapter 11.
26404 - Mr Steve Terry [12785]	Comment	Chapter 4. Chapter 11 should be part of Chapter 4 to group all sustainability matters together.	Noted and agreed	Incorporate Chapter 4 into the beginning of Chapter 11.
4.3				
26155 - Mrs Katherine Heydon [2799]	Support	4.3 Environmental Sustainability Refers to the Local Area Agreement target (per person) as the very achievable CO2 target as 9 tonnes of CO2/per person/per annum by 2011 (down from the average of 10.2 CO2/per person/year in 2006), and down to 6-7 CO2 tonnes/person/year by 2020 and 2 CO2/tonnes/person/year by 2050. These targets seem lenient in timescale (to reach the 2 CO2/tonnes/person/year), but are in accordance with permitted targets; and the goal sends a positive message.	Noted.	No change.

*Representations**Nature Summary of Main Issue**Council's Assessment**Action***CHAPTER 5 BIODIVERSITY****CHAPTER 5 BIODIVERSITY**

26552 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117] Comment Chapter 5
Remove as this makes no reference to the subject matter of this SPD and would be better incorporated into Chapter 11 in the biodiversity and ecology section 11.95

26379 - Natural England (Ms Janet Nuttall) [6952] Object Chapter 5 does not make any reference to the range of statutorily and non-statutorily protected sites of nature conservation importance and the requirements, as detailed under PPS9 to protect these from development. Suitable design can often have an important role to play here in ensuring that impacts to sites, and species, are minimised and enhancements maximised. We appreciate reference to Biodiversity SPD, however, since specific reference to importance of the UK Biodiversity Action Plan then the guide should spell out the hierarchy of statutory designations across district, legal protection and how biodiversity will be addressed through development design. We appreciate that the section on Biodiversity and Ecology under Chapter 11 addresses this issue to some extent.

The Biodiversity chapter has been re-written to make it align better with the purpose of the Design Guide. Where information is contained within the Biodiversity SPD or other documents it has been referred to.

The text has been amended to refer to the system of legally protected species and designated sites (under UK and European law). The document is still not considered the right place to go into extensive detail about the different sites and species as it is partially covered in the Biodiversity SPD and other detailed guidance (such as can be found on the Natural England website of which details are provided). To address the issues of protected species and sites would require an entire chapter on its own and is not the purpose of this design guide. NE acknowledge that some consideration had been given to this point in the previous chapter 11 which has now be integrated with Chapter 5 to provide a more detailed focus on biodiversity within the Design Guide (rather than it being spread across the document).
Geological conservation is not being included within the document at present due to lack of expertise within the authority at present. Appropriate protection is afforded through PPS9.
Table 11.1 has been brought forward and retained to illustrate how biodiversity can be addressed within various development types (such as the referred to extensions and conversions).
Ramsar sites have not been referred to as no such sites are believed to exist with the district.

Chapter 5 has been re-written, combining text from Chapters 5 and 11, to provide more up-to-date reference to biodiversity conservation being consistent with the Biodiversity SPD, and drawing attention to other guidance.

Chapter 5 has been re-written, combining text from Chapters 5 and 11, to provide more up-to-date reference to biodiversity conservation being consistent with the Biodiversity SPD, and drawing attention to other guidance.

Representations

26380 - Natural England (Ms Janet Nuttall) [6952]

Nature Summary of Main Issue

Object Similarly, designated sites of geological importance, including Sites of Special Scientific Interest, should be referred to within the document; perhaps Chapter 5 should be entitled Biodiversity and Geology, or similar.

Council's Assessment

The text has been amended to refer to the system of legally protected species and designated sites (under UK and European law). The document is still not considered the right place to go into extensive detail about the different sites and species as it is partially covered in the Biodiversity SPD and other detailed guidance (such as can be found on the Natural England website of which details are provided). To address the issues of protected species and sites would require an entire chapter on its own and is not the purpose of this design guide. NE acknowledge that some consideration had been given to this point in the previous chapter 11 which has now be integrated with Chapter 5 to provide a more detailed focus on biodiversity within the Design Guide (rather than it being spread across the document).

Geological conservation is not being included within the document at present due to lack of expertise within the authority at present. Appropriate protection is afforded through PPS9.

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Action

Chapter 5 has been re-written, combining text from Chapters 5 and 11, to provide more up-to-date reference to biodiversity conservation being consistent with the Biodiversity SPD, and drawing attention to other guidance.

Representations

Nature Summary of Main Issue

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Action

PART II BASIC DESIGN CRITERIA

PART II BASIC DESIGN CRITERIA

26553 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment

First Paragraph

This statement about South Cambridgeshire states that it consists of villages within open countryside, rather than towns and large urban contexts.

This needs to be rephrased either to only refer to the rural area of South Cambridgeshire or restarted to state that it predominantly consist of villages in open countryside, rather than towns and large urban contexts as it includes the proposed town of Northstowe and immediate surroundings of the city of Cambridge.

Third Paragraph

The design of new development need to create viable and vibrant spaces

Should this not be places?

The reader would benefit from a breakdown of the structure of this section of the guidance as the use of chapters and sections is confusing.

Northstowe and other major developments are addressed in the second paragraph.

In this context spaces is correct.

A guide to the structure of the document should be added.

First Paragraph on Basic Design Criteria (Part II) - add the word "major" before "new development" in the first line of the second paragraph to aid clarity.

A new paragraph will be added after paragraph 1.15 (in response to rep 26241) to guide the structure of the SPD.

*Representations**Nature Summary of Main Issue**Council's Assessment**Action***CHAPTER 6 URBAN DESIGN****CHAPTER 6 URBAN DESIGN**

26247 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	This chapter could usefully be merged with chapter 8.	This is a valid comment.	Review the structure of the SPD, particularly Chapters 6 and 8, to remove duplications and improve its readability.
26405 - Mr Steve Terry [12785]	Comment	Chapter 6. The inclusion of a section on design theory is a welcome addition to the SPD. However, the information in this chapter should be included in the current chapter 8 to more closely relate the theory to the application. More illustrations would aid the readability of this section.	First pointed, noted and welcomed. Inclusion of Chapter 6 in Chapter 8 is a valid comment. The request for more illustrations is a valid comment.	Review the structure of the SPD, particularly Chapters 6 and 8, to remove duplications and improve its readability. More illustrations will be provided.
6.2				
26555 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 6.2 "Urban design principles apply to all forms and scales of development." Insert: and scales	To use the word scales may be confusing as it used elsewhere in the context of scale and proportion. The addition of the word sizes would attain the same request for clarity.	Add the words "and sizes" after "forms" to paragraph 6.2.
6.3				
26556 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 6.3 "...The residents and workers of, and visitors to, the new development must have ready and convenient access to existing facilities and services; with any new facilities and services, provided as part of the development supporting and integrating with those already existing..." Delete: existing as they could access new facilities contained within a new development.	New developments will not provided the full range of facilities that people will require access to, therefore people will still require convenient access to existing facilities. The text as written remains valid.	No change

Representations

Nature Summary of Main Issue

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Action

6.8

Representations

26562 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Nature Summary of Main Issue

Comment This text is difficult to follow. Suggest reformatting through the use of bullets as follows:

"It is important that new developments are designed and constructed in a manner that minimises the demand on natural resources;

- by minimising travelling,footpath and cycle networks;

- by designing developmentsthe proposals;

- by designing to avoidcreating flood risk for others;

- by constructing with robustdevelopment;

- by designing buildings or adaptation;

- designing and constructing; and designing developments that are not only valid..."

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Valid comment to aid clarity.

Action

Reformat paragraph 6.8 with bullets as follows:

"6.8 It is important that new developments are designed and constructed in a manner that minimises the demand on natural resources:

* by minimising travelling, through the provision of mixed use developments and the provision of good and efficient public transport facilities, footpath and cycle networks;

* by designing developments that respect the existing landscape and existing biodiversity and enhances them through the implementation of the proposals;

* by designing to avoid putting development at risk from flooding and ensuring the discharge of surface and rain water is by means of sustainable drainage systems to prevent creating flood risk for others;

* by constructing with robust materials, to ensure the long term durability of the development;

* by designing buildings in a manner that readily allows for their future conversion or adaptation;

* designing and constructing buildings in a manner that minimises their energy consumption for heating, cooling and lighting; minimises the demand for potable water; and does not result in air, noise and light pollution; and designing developments that are not only valid today but remain so, in the face of changing climatic conditions, for at least 60 years for commercial buildings and 100 years for all other buildings."

Representations***Nature Summary of Main Issue******Council's Assessment******Action******6.12***

26565 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117] Comment Paragraph 6.12
The statement on design theory is purely concerned with the aesthetics/ visual qualities but should be expanded as design should not be purely visual but consider issues such as use.

This is a valid comment, but this section is about the theory of aesthetics. The suggested addition could be appropriately made in Paragraph 6.10.

Add to the end of Paragraph 6.10 ", to ensure robust high quality designs appropriate to the intended uses are attained."

Design Elements

26567 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117] Comment Design Elements
It should be noted though these terms are in standard use within urban design, slight variations in terminology may also often used/ interchanged to represent these elements.

This section would benefit from an illustrative representation of each of these points to assist lay

It is noted that there are some slight variations in the use of terminology. As stated in paragraph 6.13 this section is intended to set out how design comments will be provided to developers and their architects. It would be appropriate to state in paragraph 6.13 to incorporate a reference to design language.

The request for illustrations is valid.

In paragraph 6.13, amend the last sentence to read:
"The following is a guide to how design theory will be assessed in designs submitted to the Council and how design language will be used when providing comments on design considerations will be referred back to designers."

Provide illustrations.

6.15 - Line

26406 - Mr Steve Terry [12785] Object 6.15. Line may be implied intentionally as well as accidentally; in line 3 add "intentional or" before accidental repetition.

Valid comment.

Add "intentional or" before "accidental" on the 3rd line of paragraph 6.15.

6.17 - Form or Mass

26407 - Mr Steve Terry [12785] Object 6.17. In line 3 delete "or well defined spaces" as these are not positive forms, but are negative forms.

Valid comment, amend accordingly.

In line 3 of paragraph 6.17 delete "or well defined spaces"

Representations***Nature Summary of Main Issue******6.22 - Pattern***

26571 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment Paragraph 6.22
 "This is the use of the design elements, point, line, shape, texture, tone and colour, to create the visual design, to create an integrated whole. Too much of the same element can become boring , but the use of too much over use of variety can confuse the unity of the design."

Suggested changes: Too much use to The over use boring to monotonous
 It should be noted the deliberate use of variety in a design can be used to challenge people's perceptions of a place and be a deliberate design ploy.

6.23 - Rhythm

26572 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment Paragraph 6.23
 "This is the frequency of the repetition of a feature at regular intervals to create an intentional series, at regular intervals, which breaks a design down into sub-sections, e.g. a row of windows, pillars, or trees. Too many of the same repetition can become boring , whilst an inconsistent rhythm can destroy any form of unity."

Change: become boring to lead to monotony
 Add: challenges and

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The first point is a subtle change in meaning. It is considered that the wording as existing is preferable and should be retained.

The second point is a valid comment suggesting a more appropriate word.

The third point is valid, but is a general point in relation to all the design elements. Add a comment relating to deliberate design ploys to paragraph 6.13.

Valid comment, amend accordingly.

Action

In line 3 of paragraph 6.22 substitute "boring" with "monotonous".

Add a new sentence to the end of paragraph 6.12 as follows:
 "Good architects and designers who possess a strong and controlled command of the use of the design elements, may, intentionally break the following 'rules of grammar' to create strong individualistic design solutions."

In line 4 of paragraph 6.23 substitute "boring" with "monotonous".

Representations***Nature Summary of Main Issue******Council's Assessment******Action******CHAPTER 7 LOCATION AND CONTEXT******CHAPTER 7 LOCATION AND CONTEXT***

26383 - Natural England (Ms Janet Nuttall) [6952]	Comment	The guide should refer to the Cambridgeshire Green Infrastructure Strategy and demonstrate its commitment and support to individual projects where relevant. This strategy is currently being reviewed.	Valid comment.	Add a new section on Green Infrastructure after paragraph
<i>7.2</i>				
26408 - Mr Steve Terry [12785]	Object	7.2. In line 6 after "... form of buildings, with" add a reference to broking down the form to appear as a composition of forms, rather than one large one.	Valid comment, for clarity make addition as suggested.	In line 6 of paragraph 7.2 after "... form of buildings, with" add "the built form broken down to appear as a composition of forms, rather than one large form and
<i>7.13 - Changes for Modern Development</i>				
26410 - Mr Steve Terry [12785]	Object	7.13. For clarity in line 4 change "an" to "a" and add "piecemeal".	Valid comment. For clarity amend as suggested.	In line 4 of paragraph 7.13 change "an" to "a" and add "piecemeal".
26409 - Mr Steve Terry [12785]	Object	For clarity add to the title "Challenges for Modern Development" the words "in the Villages".	Valid comment, amend as suggested to increase clarity.	To the heading "Challenges for Modern Development" before paragraph 7.13 add the words "in Villages".
<i>7.15</i>				
26411 - Mr Steve Terry [12785]	Object	7.15. "Proportions" is listed twice in the last sentence.	Valid comment. Delete the second reference to	In line 4 of paragraph 7.15 delete the word "proportions".
<i>7.18</i>				
26412 - Mr Steve Terry [12785]	Object	7.18. For clarity in line 4 add "that is" before generally.	Valid comment. Amend as suggested for clarity.	In line 4 of paragraph 7.18 after "...church," add "that is".

Representations***Nature Summary of Main Issue******Council's Assessment******Action******7.20***

26413 - Mr Steve Terry [12785]

Object

7.20. and 7.24 are repetitious and could be combined into one paragraph.

Valid comment. Combine paragraphs to remove

Delete the first sentence of paragraph 7.20 and insert the text of paragraph 7.24 at the beginning of paragraph 7.20 to read:
 "Each village has a defined village framework shown on the Local Development Framework DF Proposals Map, outside of which there is a presumption against development. Certain villages have also prepared their own Village Design Statements and, where available, these should always be consulted. The Local Development Framework also outlines Conservation Areas, and a number of these are described in full detail in Conservation Area Appraisals. These Appraisals also contain summaries of Listed Buildings. The Council keeps a register of Listed Buildings and lists and descriptions are available at English Heritage's Images of England website (www.imagesofengland.org.uk). The grade of listing defines the special attributes of the building and setting, and a full analysis of the special characteristics of the Listed Building and its setting will inform the extent and type of new development possible."

7.27

26414 - Mr Steve Terry [12785]

Object

7.27. What group is being referred to at the end of the first sentence?
 The grammar needs correcting in the last sentence.

Valid comments. For clarity amend as suggested.

At the end of the first sentence of paragraph 7.27, add the word "building" before "...group" ; and at the beginning of the second sentence change "They" to "The" and add the word "extensions". In line 6 add "they" after "extensions" and change "relate" to "relating".

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>7.28 26415 - Mr Steve Terry [12785]</p>	Object	7.28 and 7.29 should be combined into one paragraph.	Valid comment. Amend as suggested.	Add the text of paragraph 7.29 onto the end of paragraph 7.28.
<p>7.32 26416 - Mr Steve Terry [12785]</p>	Object	7.32 and 7.33 should be combined into one paragraph.	Valid comment. Amend as suggested.	Add the text of paragraph 7.33 onto the end of paragraph 7.32.
<p>7.37 26167 - Mrs Katherine Heydon [2799]</p>	Support	7.37 refers to mixed use in terms of business and residential property distribution and the benefit of maintaining a diurnal activity. Strongly support in terms of both good usage of available resources - such as on street parking, but also in terms of a crime mitigation measure by keeping an area	Comment of support noted. This applies to residential, business and other uses, so change to residential and non-residential.	In line 3 of paragraph 7.37 change "employment" to "non-residential".
<p>7.38 26170 - Mrs Katherine Heydon [2799]</p>	Support	Strongly support 7.38 and 7.39 which outline consequences/sustainability of local small scale business related to 7.37 above.	Support noted	No change
<p>7.39 26172 - Mrs Katherine Heydon [2799]</p>	Support	Strongly support 7.38 and 7.39 which outline consequences/sustainability of local small scale business related to 7.37 above.	Support noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
7.40 26417 - Mr Steve Terry [12785]	Comment	7.40. Please expand/clarify the minimum facilities for a community focus.	Valid comment. Paragraph 8.5 begins to address this issue so it would be better locate this additional information after that.	Add a new paragraph after paragraph 8.5, with supplementary illustrations, to read: "The Urban Task Force report, Towards an Urban Renaissance, illustrates preferred walking distances to facilities from homes, see diagram. Barton et al. develop this work in, Shaping Neighbourhoods A Guide for Health, Sustainability and Vitality, where they identify illustrative catchment populations for various facilities, together with the catchment radius required to support those facilities at different residential densities, see table."
26446 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	The statement that 'the bare minimum to create a community focus is a shop, bus stop and primary school' is not supported. The form and need for a community focus depends upon the nature and scale of the development/ community. Depending on the nature of the retail offer it may or may not act as a focus of a community and specifically identifying 3 forms of facility as the 'bare minimum' is far too simplistic. Equally, other facilities such as a well designed piece of open space can also act as a focus of a community. The sentence "The bare minimum to create a community focus is a shop, bus stop and primary school" should be deleted.	The sentiment is accepted, that this is a more complex issue. However the statement is made in the Urban Design Compendium on page 42. The statement should therefore be properly referenced and quoted for clarity. Expansion should be provided on the desired range of neighbourhood facilities.	Amend 4th sentence of paragraph 7.40 to read "Llewelyn-Davies (2000) states "to create a strong community focus, a shop, bus stop and primary school will usually be considered a bare minimum." Add paragraph after 8.5 to read: "The Urban Task Force report, Towards an Urban Renaissance, illustrates preferred walking distances to facilities from homes, see diagram. Barton et al. develop this work in, Shaping Neighbourhoods A Guide for Health, Sustainability and Vitality, where they identify illustrative catchment populations for various facilities, together with the catchment radius required to support those facilities at different residential densities, see table."
7.46 26418 - Mr Steve Terry [12785]	Object	7.46. Add retail premises to the list of blank 'boxes'.	Valid comment. Make addition as suggested.	Amend line 1 of paragraph 7.46 to include "retail" before "industrial".

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>7.47</i> 26419 - Mr Steve Terry [12785]	Object	7.47. Add the word "surface" before "car Parking" in line	Valid comment. Amend as suggested.	In line 4 of paragraph 7.47 add "surface" before "car parking".
<i>7.51</i> 26447 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	Paragraph 7.51 could imply that whatever the mix of housing it all should be built to 'Lifetime Homes' standard. However this is often unfeasible due to the type of housing, (flats) or due to locality. The SPD appears to be introducing new planning policy which properly should be introduced and formally consulted on through a formal revision to the appropriate Development Plan Document. This paragraph should be rephrased or the reference to 'Lifetime Homes' removed.	Amend to remove the potential misunderstanding this representation identifies.	Amend first sentence of paragraph 7.51 to read: "All large residential areas should include a mix of sizes, types and tenures of property, within neighbourhoods, to cater for all stages in the life of households, from single young people through to residential care facilities, so that whatever their needs, residential opportunities exist for people without having to leave the neighbourhood, if they so wish, in accordance with the principles of 'Lifetime Homes'."
26173 - Mrs Katherine Heydon [2799]	Support	7.51 Housing Types and Mix Strongly support mixed sizes (varied style - detached, 'condo', terraced, flats, semi-detached etc.) of housing dispersed throughout development sites. Also strongly support the integration of 'affordable' housing 'to meet identified local needs' throughout building development sites - rather than the alternative of segregated social housing or affordable/social housing in distinct or separate plots.	Comment noted, support welcomed.	No change
<i>7.55</i> 26351 - Mrs Katherine Heydon [2799]	Object	7.55 Districts/Neighbourhoods/Communities I would strongly support a specific reference to the integration of affordable and social rented housing to meet identified local needs.	Comment noted and support welcomed.	No change
26174 - Mrs Katherine Heydon [2799]	Support	7.55 Districts/Neighbourhoods/Communities Strongly support a mix of 'tenures' - freehold, leasehold and social rented.	Comment noted and support welcomed.	No change

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7.56

26175 - Mrs Katherine Heydon
[2799]

Support

7.56 Districts/Neighbourhoods/Communities
Strongly support the use of higher density housing nearer village centres/transportation hubs. A higher density of people living in close proximity to transportation 'nodes' or hubs, allows for a greater number of people to encourage usage and provision of a workable public transport hub, retention/provision of shops and facilities.

Comment noted and support welcomed.

No change

*Representations**Nature Summary of Main Issue**Council's Assessment**Action***CHAPTER 8 THE ELEMENTS OF URBAN FORM****CHAPTER 8 THE ELEMENTS OF URBAN FORM**

26420 - Mr Steve Terry [12785]	Comment	Chapter 8. There is some duplication arising from pertinent issues being addressed in different sections from differing perspectives. The comments are all pertinent where they occur, but could there be any repackaging to remove apparent duplication?	Valid comment.	Review the structure of the SPD, particularly Chapters 6, 7 and 8, to remove duplications and improve its readability.
8.2				
26448 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	Gallagher Longstanton Ltd and the Homes and Communities Agency object to statement that a permeable network will not contain cul-de-sacs. Although these may not enable motorised vehicles through them, they may contain footpath or cycle ways and therefore be permeable. Cul-de-sacs can be utilized when the aim is to minimise the use of the car by creating more torturous routes for car users whilst maintaining direct routes for non-motorised users. The paragraph should be amended to read "The development must create an effective network of streets and buildings that achieve a permeable network and encourage cycling and walking. A permeable network is one that is easy to navigate and easily accessible by means of interconnected routes. It will not contain no-through-routes for non motorized users as these..."	The comment on creating less direct routes for private cars is valid and should be addressed.	Make additions to the last sentence of paragraph 8.2 to read: "A key structuring principle should be the provision of a direct, safe and convenient movement pattern on foot, bicycle or public transport". And add another sentence to read "Movement patterns for private motorcars may be less direct to discourage their use; therefore some routes may not allow a through movement for motorcars."
26177 - Mrs Katherine Heydon [2799]	Support	8.2 Creating a Sense of Place Strongly support a 'permeable network' of streets that encourages walking and cycling. Permeable routes encourage exploring the local neighbourhood by foot and cycle. Safer, permeable, direct routes provide an incentive for commuter behaviour (for instance the Guided Bus Cycleway between Histon and CRC), leisure exploration, investigation of local sights, walks, parks, facilities, and small local shops and provisions.	Comment noted and support welcomed.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>8.5</i></p> <p>26421 - Mr Steve Terry [12785]</p>	Comment	8.5. Add recommended population figures to supplement walking distances.	Valid comment. Add as recommended to improve clarity.	Add a new paragraph, with supplementary illustrations, after paragraph 8.5 to read "The Urban Task Force report, Towards an Urban Renaissance, illustrates preferred walking distances to facilities from homes, see diagram. Barton et al. develop this work in, Shaping Neighbourhoods A Guide for Health, Sustainability and Vitality, where they identify illustrative catchment populations for various facilities, together with the catchment radius required to support those facilities at different residential densities, see table."
<p><i>Table 8.1</i></p> <p>26178 - Mrs Katherine Heydon [2799]</p>	Support	Table 8.1 Urban Structure Strongly support the over-looking of public spaces from buildings and windows. Encourages safety, the perception of safety and reduces crime and consequently encourages the usage of the public space.	Comment noted and support welcomed.	No change
<p><i>Table 8.2</i></p> <p>26422 - Mr Steve Terry [12785]</p>	Comment	Table 8.2. Limited road frontage and space in depth: is there uncertainty about the 30m x 50m dimensions?	Valid comment. It is not necessary to state the minimum dimension, as it is for the designer to assess each	Delete the words "(typical minimum dimensions for frontage development plus courtyard is 30m width x 50m depth)?" in the second column of the fifth row of
<p><i>8.24</i></p> <p>26573 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]</p>	Comment	Paragraph 8.24 Images need to be at the same scale if they are intended to be comparable.	Valid comment. Change the drawings.	Replace the drawings after 8.24 with more suitable images.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8.41 26423 - Mr Steve Terry [12785]	Comment	8.41. Name the successful examples of contemporary design.	Valid comment. Insufficient examples have been identified to include in the document at this time.	No change.
8.49 26424 - Mr Steve Terry [12785]	Object	8.49. Remove the reference to developers' standard house types. More specific designs are required not standard house types.	Valid comment. Delete as suggested.	In the 11th bullet point of paragraph 8.49 delete the word "standard" in line 4 and substitute the word "types" with "designs" in
8.51 26425 - Mr Steve Terry [12785]	Object	8.51. Insert "where possible" before "block their views". Add a drawing illustrating the vertical daylight drawing alongside the horizontal drawing.	Valid comments. Amend text and add drawing as suggested.	In line 5 of paragraph 8.51 add "where possible" before "block their views". Add a drawing illustrating vertical daylight angles.
8.52 26426 - Mr Steve Terry [12785]	Object	8.52. Add "protecting" at the beginning of the sentence.	Valid comment. Add as suggested.	Add "Protecting" to the beginning of paragraph 8.52.

Representations***Nature Summary of Main Issue******Council's Assessment******Action******8.53***

26427 - Mr Steve Terry [12785]

Comment 8.53. The text refers to a 20m distance between windows to habitable rooms, whilst the drawing refers to 18m. Be consistent.

Valid comment. The drawing is incorrect and the text contains a typographical error as 20m should read 25m. This distance relates to 2 storey residential properties and should be increased to 30m for 3 storey residential properties. Amend the text and drawings accordingly.

Amend paragraph 8.53 to read:
 "To prevent the overlooking of habitable rooms to the rear of residential properties and rear private gardens, it is preferable that a minimum distance of 15m is provided between the windows and the property boundary. For two storey residential properties, a minimum distance of 25m should be provided between rear or side building faces containing habitable rooms; which should be increased to 30m, for 3 storey residential properties. Where the opposing alignment of facing windows is significantly offset, these distances may be slightly reduced. Where blank walls are proposed opposite the windows to habitable rooms, this distance can be reduced further, with a minimum of 12m between the wall and any neighbouring windows that are directly opposite."

Amend the diagram after paragraph 8.53, together with its explanatory text, to state 25m.

8.57

26428 - Mr Steve Terry [12785]

Object 8.57. Add "potential" before "hiding places" in the last bullet point.

Valid comment amend as suggested.

Add "potential" before hiding places in the last bullet point of paragraph 8.57.

26179 - Mrs Katherine Heydon [2799]

Support 8.57 Community Safety
 Strongly support 'natural surveillance' of public and semi public spaces. Deters crime and increased perception of safety. Encourages use of the space.

Comment noted and support welcome.

No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>8.58 26429 - Mr Steve Terry [12785]</p>	Object	8.58. Delete the reference to "Places, Streets, and Movement" and replace it with "Manual for Streets".	Valid comment amend as suggested.	Delete "Places, Streets, and Movement: A Companion Guide to Design bulletin 32" and insert "Manual for Streets" from paragraph 8.58
<p>Table 8.3 26430 - Mr Steve Terry [12785]</p>	Object	Table 8.3. Last bullet point in don't column for routes, add "high" before "fenced" and add "/walled/hedged" after fenced. Last bullet point in don't column for structure, is "monoculture" relevant?	Valid comment, amend as suggested.	In the last bullet point in the 'Don't' column for 'Routes', add "high" before "fenced" and add "/walled/hedged" after fenced in Table 8.3.
<p>8.64 26574 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]</p>	Comment	It would more appropriate to say that the network of streets, squares, parks and greens are the principal elements of the public realm, not what binds them. This sentence should be amended to read, "The network of streets, squares, parks and greens, form the principal elements of the public realm. These places need to	Valid comment about "binds the public space together". They are, however, more than the principle elements.	Delete "is the fabric that binds the public space together" and replace it with "forms the structure of the public realm" in the first sentence of paragraph 8.64.
<p>8.65 26575 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]</p>	Comment	Architects and designers are not the only professions involved in this process so the sentence should be amended to: "Creating high quality public and private spaces requires designers, developers, engineers and town planners to develop places that suit the needs and activities..."	Valid comment.	Replace "architects and urban designers" with "all those involved" in paragraph 8.65.
<p>8.68 26577 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]</p>	Comment	Paragraph 8.68 This paragraph could also make reference to the Open Space in New Developments SPD.	Valid comment, add a reference as suggested.	Add to the end of paragraph 8.68 "Reference should be made to the Council's "Open Space in New Developments Supplementary Planning Document"."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8.69 26449 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	By requiring all residents to have some form of park space within a 400 metre walking distance of their home the SPD appears to be introducing new planning policy. The last sentence of paragraph 8.69 should be deleted.	This is recommended in the "Urban Design Compendium"; clarify the origin of this recommendation.	At the beginning of the 4th sentence of paragraph 8.69 add "The Urban Design Compendium recommends that".
8.82 26183 - Mrs Katherine Heydon [2799]	Support	8.82 Forms, Materials and Details Support the use of local materials - where advantageous in energy production calculations/economically viable in cost benefit terms - to reduce the energy required for transportation of building materials. Strongly support the policy for low grade, relatively ubiquitous building materials.	Comment noted and support welcomed.	No change
<i>Public Realm and Landscape Framework</i>				
26433 - Sport England East (Mr Phillip Raiswell) [4720]	Comment	We are disappointed that there is no reference to the need for urban design to promote opportunities for people to take part in sport and physical activity. This principle cuts across many agendas, including sport itself, but also health, well-being and sustainable development and transport. Sport England published 'Active Design' in 2007, which promoted the concept of integrating opportunities for sport and physical activity into master plans/development briefs etc through good design. In your document the principles of Active Design could be incorporated into the section on Public Realm Design.	Valid comments. Include a reference to the document as suggested	To the end of paragraph 8.68 add "Sport England's publication 'Active Design', promotes the concept of integrating opportunities for sport and physical activity into master plans through good design." Add the Sport England document to the list of references in
26249 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	The document could also be included within the Appendix Given the importance of the public realm and landscape to creating successful places, we would strongly recommend that this section is simplified and clarified. In addition, we are a little concerned as to how the Design Guide SPD will sit alongside the Landscape in new Developments SPD. It is felt that there is no need to repeat information in two separate documents, and that it might be easier for the Landscape in New Developments SPD to form a section within the Design Guide SPD to avoid repetition and the potential for conflicting advice.	Valid comment. Ensure the document relates to the Landscape in New Developments SPD, without any contradiction.	Ensure the document relates to the Landscape in New Developments SPD, without any

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>8.90</i>				
26578 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 8.90 "Everything in the public realm is landscaping; all hard and soft landscaping, relationship to the countryside, streets, and squares, open space, parks and water movement corridors..."	This is not a quote, so cannot be referenced. The representation implies a misreading of the intention of the text, which could be amended to clarify	In line 1 of paragraph 8.90 delete "is" and replace it with ", from the design perspective, can be considered as".
26251 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	This definition requires a reference The statement "Everything in the public realm is landscaping" is not correct. The distinction needs to be made between public realm and landscape in the modern context. Essentially, public realm is the hardscape and landscape is the softscape. These elements must be considered together and inform the detailed design of spaces within a site.	The proposed distinction is one that has been used in the past. Such a distinction created a division of responsibilities for hard and soft landscaping, resulting in the two not forming a cohesive whole. The purpose of the paragraph is to promote integration and overcome the fragmentary approach to designing the public realm. The recommendation is not accepted as it would dilute the intention.	No change
<i>Table 8.5</i>				
26431 - Mr Steve Terry [12785]	Comment	Table 8.5. No examples are listed.	Valid comment. The examples column is not necessary, remove it.	Delete column 3 of Table 8.5.
<i>8.94</i>				
26580 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	This statement appears to be confusing the different types of planning applications as a full planning application will not have reserved matters, but may have conditions. Reserved matters will be relevant to outline planning applications.	Valid comment. Clarify the statement by removing the reference to full planning permission.	In line 5 of paragraph 8.94 delete the words "for full planning permission".
<i>8.100</i>				
26186 - Mrs Katherine Heydon [2799]	Support	8.100 Private Gardens and Amenity Spaces Strongly support the use of a holistic, integrated approach to building, open space and landscape design.	Comment noted and welcomed.	No change
<i>8.101</i>				
26188 - Mrs Katherine Heydon [2799]	Support	8.101 Private Gardens and Amenity Spaces Strongly support the need for every home to have access to a 'private or communal amenity space'.	Comment noted and welcomed	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>8.102</i>				
26450 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	The statement "Incorporate a private sitting out area positioned close to internal living accommodation" in the second bullet point is overly prescriptive. The design of a private garden should be flexible and allow home owners to personalise their gardens as these are private spaces. This is adequately expressed in bullet 6 'Enable flexibility of use and personalisation. Bullet 2 should therefore be deleted.	The private space should allow flexibility of use, as different people will wish to use the space in different ways to satisfy their particular requirements. However there is general desire for many people to sit close to the house; and if such an area is located close to the main internal living space this offers the opportunity to use the external space as an extension of the internal space. There is therefore a valid point in retaining the bullet point.	No change
26190 - Mrs Katherine Heydon [2799]	Support	8.102 Private Gardens and Amenity Spaces Strongly support the need for gardens to be of a functional size to allow sunlight and usage - both for leisure and vegetable cropping.	Comment noted and welcomed.	No change
<i>8.104</i>				
26191 - Mrs Katherine Heydon [2799]	Support	8.104 Private Gardens and Amenity Spaces Strongly support that balconies should be of sufficient size to allow outdoor dining.	The comment is noted and the support welcomed.	No change
<i>8.113</i>				
26581 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Change Porous to Permeable which is the correct term. Porous describes the material's properties to absorb moisture. Porous hard landscaping materials can often be problematic as they can be damaged through freeze thaw effect and are typically susceptible to staining.	Valid comment, amend as suggested	In line 3 of paragraph 8.113 replace "porous" with "permeable"
26192 - Mrs Katherine Heydon [2799]	Support	8.113 Paving Strongly support the use of 'porous paving materials' 'where possible' 'to maximise surface water percolation' and 'minimise run-off'.	Comment noted and support welcomed.	No change
<i>8.114</i>				
26494 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	Reference should also be made to the need to consider design implications of providing adequate cycle parking as part of new developments. (para 8.114).	Valid comment, amend as suggested.	To the end of the paragraph 8.114 add "Reference should also be made to the need to consider design implications of providing adequate cycle parking as part of new developments."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
8.115 26193 - Mrs Katherine Heydon [2799]	Comment	<p>8.115 Parking</p> <p>In balance one has a neutral view on 'parked cars' should be located 'beneath' or 'at the side or rear' of buildings. The balance being made up of the 'for' and 'against' conflicts below:</p> <p>Against: On-street parking encourages a natural measure of traffic calming in lieu of, in my opinion, more unsightly street furniture; as such on-street parking should be facilitated and not 'designed out' of a development.</p> <p>For: However often 'on-street' parked cars are positioned on cycle paths or footpaths which cause potential accidents/NMU issues limiting the positive traffic-calming impact of on-street car parking.</p>	Comments noted.	No change
8.117 26432 - Mr Steve Terry [12785]	Comment	8.117. Refer to the English Partnerships document Car parking What Works Where.	Valid comment, add a reference to the publication.	To the end of the paragraph 8.117 add "Reference should be made to English Partnerships' Car Parking What Works Where, especially to the golden rules on p18."
26194 - Mrs Katherine Heydon [2799]	Support	8.117 Parking Strongly support the overlooking of communal parking areas and the use of (low wattage, detector/timed) lighting provision.	Comment noted and support welcomed.	No change
8.119 26195 - Mrs Katherine Heydon [2799]	Support	<p>8.119 Public Art</p> <p>Strongly support the integration of public art in the design purpose.</p> <p>Particularly favour where art has a functional quality as well as an aesthetic provision.</p>	Comment noted and support welcomed.	No change
8.123 26196 - Mrs Katherine Heydon [2799]	Support	8.123 Public Art Strongly support the use of work by local, Cambridgeshire-based, artists for local Public Art. Particularly support where art is of a high standard and an	Comment noted and support welcomed.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>8.138 26436 - Great Shelford Parish Council (Mrs Wenda Burbidge) [1887]</p>	Comment	In section 8.138 photovoltaic panels also ought to be mentioned as they are likely to be more common once the cost of them makes them more economic.	Solar panels is a term that includes both solar hot water and photovoltaic panels.	No change
<p>8.139 26197 - Mrs Katherine Heydon [2799]</p>	Support	<p>8.139 Solar Panels Strongly support the incorporation of solar panels into the roof design when incorporated in a new build.</p> <p>Support the use of solar panels where economically viable in terms of cost of the solar panel in relation to energy generation and savings associated with the installation over the lifespan of the product.</p>	Comment noted and support welcomed.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
CHAPTER 9 ENVIRONMENTAL HEALTH				
CHAPTER 9 ENVIRONMENTAL HEALTH				
26384 - Natural England (Ms Janet Nuttall) [6952]	Support	We support the objectives and principles of this design guide in relation to minimising impacts on air quality, noise and waste and in seeking to incorporate water and energy conservation measures as far as possible.	Support noted.	No change
9.1				
26495 - Cambridgeshire County Council (Mrs Wendy Hague)	Object	The text should be amended to make it clear that the requirement for storage of waste and recycling materials applies equally to residential developments as well as non-residential development and that these requirements are set out in the RECAP Waste Management Design Guide (para 9.1).	Agree and necessary to detail what RECAP abbreviation stands for in RECAP Waste Management Design Guide in paragraph 9.3.	Amend paragraph 9.1 to read: "Safe and secure provision should be provided for the storage of the waste and recycling materials collection receptacles (Council or Private Contractor), for all residential (domestic) and non-residential buildings (commercial) uses, without creating a nuisance or being unsightly for the occupants or the general streetscape." Add sentence to the end of paragraph 9.3 to include meaning of RECAP abbreviation, as follows: "The RECAP Guide was originally published by the RECAP Partnership in 2008 and adopted as SCDC policy in 2008. It has been recently revised by the County Council together with Peterborough City Council as a draft Supplementary Planning Document (SPD) and will be subject to public consultation in February/March 2010 and likely

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>9.2 26496 - Cambridgeshire County Council (Mrs Wendy Hague)</p>	Comment	It is unclear why the storage of waste materials is described as only being temporary given that the RECAP Waste Management Design Guide refers to a requirement for permanent (and where necessary) temporary waste storage facilities being required within developments (para 9.2).	Agree this an oversight / typo error.	Amend paragraph 9.2 deleting the words "such temporary".
<p>9.3 26497 - Cambridgeshire County Council (Mrs Wendy Hague)</p>	Comment	The County Council welcomes the reference to development layouts being considered in the context of the RECAP Waste Management Design Guide and the Cambridgeshire Design Guide for Streets & Public Realm. For clarity it should be made clear that the RECAP Waste Management Design Guide which was originally published by the RECAP Partnership in 2008 has been recently revised by the County Council together with Peterborough City Council as a Supplementary Planning Document and will be subject to public consultation in February/March 2010 (para 9.3).	Valid comment.	Clarification required- Amend paragraph 9.3 to read: "Access for refuse, delivery and emergency vehicles is best provided by means of permeable grid layout, but where dead ends are unavoidable, turning heads must be provided. Development layouts and the provision of operational waste and recycling provision must accord with Building Regulation H6 and the requirements of the RECAP Waste Management Design Guide 2007 (RECAP Guide) and the Cambridgeshire Design Guide for Streets & Public Realm. The RECAP Guide was originally published by the RECAP Partnership in 2008 and adopted as SCDC policy in 2008. It has been recently revised by the County Council together with Peterborough City Council as a draft Supplementary Planning Document and will be subject to public consultation in February/March 2010 and likely adoption in mid to late 2010."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
9.4				
26451 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	The requirement for all developments to store rainwater and store grey water for use the specific ways noted in this paragraph is unduly onerous and introduces a statement of detailed policy. The paragraph should be amended to read "...all developments should aim to collect and store rainwater and grey water for reuse. Any	Comment noted. On reviewing this section it is concluded that this paragraph is out of context and is already adequately addressed in paragraph 11.56 of Chapter 11 Environmental Sustainability- Sustainable Urban Drainage- Incorporate Water Conservation Measures -Water Saving Hierarchy.	Delete paragraph 9.4
26198 - Mrs Katherine Heydon [2799]	Support	9.4 Waste collection and recycling Strongly support the use of grey-water recycling measures in new builds.	Support noted but note this paragraph is out of context and is already adequately addressed in paragraph 11.56 of Chapter 11 Environmental Sustainability- Sustainable Urban Drainage- Incorporate Water Conservation Measures -Water Saving Hierarchy.	Delete paragraph 9.4
9.5				
26498 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	For clarity it is suggested that the text in this paragraph should appear after paragraph 9.11 as it relates to the content of the Draft SPD (para 9.5).	Comment noted. However, 9.5 should remain due to amendments to paragraph 9.3 but additional reference to County Council draft SPD should be made at the end of paragraph 9.11.	Add a new sentence / footnote to end of paragraph 9.11 to read "NB: the above detailed capacities are indicative and may need adjusting subject to local and national requirements / priorities and the final version of any adopted County Council SPD on Waste Management Design
9.9				
26499 - Cambridgeshire County Council (Mrs Wendy Hague)	Support	The County Council welcomes the reference made to a completed RECAP Waste Management Design Toolkit forming part of the submission requirements for planning applications (para 9.9).	Comment noted and support welcomed.	No change
9.11				
26199 - Mrs Katherine Heydon [2799]	Support	9.11 Waste collection and recycling Support the requirement for an 'internal storage capacity' in new build kitchens to facilitate waste recycling	Comment noted and support welcomed.	No change

Representations***Nature Summary of Main Issue******Council's Assessment******Action******9.12***

26583 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment The Manual for Streets is not national design guidance for waste and recycling and the reference should be removed and replaced with more appropriate guidance.

Valid comment. Manual for Streets is not national design guidance for waste and recycling. Clarification required.

Clarification required- Amend paragraph 9.12 to read:
 "The Cambridgeshire Design Guide for Streets & Public Realm (Cambridge Horizons 2007), complements national design guidance, such as the Government's Manual for Streets to promote the highest possible standards in all new developments, large and small. The purpose of the Design Guide for Streets & Public Realm is to set out the key principles and aspirations that should underpin the detailed discussions about and requirements for the design of streets and public spaces that take place on a site-by-site basis. The aim is to integrate street design with the RECAP Guide so that there are adequate street widths and access arrangements to accommodate refuse / recycling vehicles so that suitably located waste / recycling collection points can be reached and serviced.

The Environment Services Team within Health and Environmental Services can provide further information and advice."

Representations***9.80***

26443 - Middle Level Commissioners (Mr Graham Moore) [6194]

Nature Summary of Main Issue

Object In addition to your Council's Award Drains there are many other important protected watercourses including Main River, I.D.B. drains which provide water level and flood risk management and the adverse impacts upon which should also be considered by potential developers when required. Contravention of the Land Drainage Act is a criminal offence which could lead to enforcement action being taken against the perpetrator.

Council's Assessment

Valid comment and reference should be made to SCDC's Strategic Flood Risk Assessment 2005.

Action

Clarification required. Amend paragraph 9.80 to read: "Notwithstanding PPS25 there are additional requirements that may fall on developers in connection with the South Cambridgeshire's Awarded Watercourses system. In addition to the warded drains / watercourses, it should be noted that the Environment Agency, Internal Drainage Boards and other landowners / bodies have responsibility for other watercourses. These will also need to be given careful consideration by developers in order to mitigate any potential adverse impact such as flooding."

Add sentence to paragraph 9.78 as follows:

"Reference should be made to South Cambridgeshire Strategic Flood Risk Assessment 2005 (SCDC SFRA 2005). The Assessment provides a detailed and robust assessment of the extent and nature of the risk of flooding to specific growth areas within South Cambridgeshire and its implications for land use planning. It enables South Cambridgeshire to better meet the obligations created by Planning Policy Guidance Note 25: Development and Flood Risk. SCDC SFRA 2005 can be downloaded from: <http://www.scambs.gov.uk/Environment/Planning/DistrictPlanning/LocalDevelopmentFramework/Archive/FloodRisk.htm>."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
CHAPTER 11 ENVIRONMENTAL SUSTAINABILITY				
11.5				
25579 - Anglian Water Services Limited (Mrs Amie Lill) [10900]	Support	Thank you for giving Anglian Water the opportunity to comment on this consultation. We support the criteria listed that applicants are expected to take account of, in particular the importance of incorporating water conservation measures into developments, the adaptation to the impacts of climate change and the use of Sustainable Urban Drainage Systems (SUDs).	Support noted.	No change
Reduce Carbon Dioxide Emissions				
26500 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	It would be helpful if the Design Guide referred to the requirements of policy NE/1: Energy Efficiency of the Development Control Policies DPD particularly in relation to the requirement to reduce carbon emissions emitted per year in comparison to existing Building Control standards by 10%. It would be helpful to refer to policy NW24 of the Cambridge North West Area Action Plan as the Code for Sustainable Homes standards set out in this policy include minimum energy efficiency standards. There are also similar requirements under the BREEAM assessment which would apply to non-residential development.	Noted and agreed.	Reference to Policy NE/1 included in paragraph 11.26.
11.40				
26200 - Mrs Katherine Heydon [2799]	Comment	11.40 on page 160 appears to re-iterate and enhance policy NE/3 from the DCPDPD, without acknowledging the source document (reference below): July 2007 Development Control Policies DPD page 75 POLICY NE/3 Renewable Energy Technologies in New Development All development proposals greater than 1,000 m2 or 10 dwellings will include technology for renewable energy to provide at least 10% of their predicted energy requirements, in accordance with Policy NE/2.	Noted	Add reference in paragraph 11.40 to the Development Control Policies DPD as source of Policy NE/3.

Representations***Nature Summary of Main Issue******Council's Assessment******Action***

26501 - Cambridgeshire County Council (Mrs Wendy Hague)

Comment It would be helpful to include reference to policy NW24 of the Cambridge North West Area Action Plan which include a requirement to reduce carbon dioxide emissions by 20% through the use of on-site renewable energy generation.

Similarly the Northstowe AAP includes target of 20% of predicted needs from renewable energy subject to wider

Agree, there are higher standards in some of the Area Action Plans which should be recognised in the SPD.

Add text to paragraph 11.40 to refer to higher standards in some Area Action Plans as follows:
"Some areas of the district have higher standards (see the relevant Area Action Plans for details)."

Incorporating Water Conservation Measures

25580 - Anglian Water Services Limited (Mrs Amie Lill) [10900]

Support Thank you for giving Anglian Water the opportunity to comment on this consultation.

We support the requirement to incorporate water conservation measures into the design of developments. This is key to meeting the requirements set out in the code for sustainable homes and in meeting the high growth demand in the east of England.

Support noted

No change

11.53

26502 - Cambridgeshire County Council (Mrs Wendy Hague)

Comment It would be helpful to include reference to the policies NS/21, CE/22 and CSF/19 of the Northstowe, Cambridge East and Cambridge Southern Fringe Area Action Plans which include a requirement to reduce mains water use as part of these developments as being essential requirements.

Similarly it would be helpful to refer to policy NW24 of the Cambridge North West Area Action Plan as the Code for Sustainable Homes standards set out in this policy include minimum water efficiency standards. There are also similar requirements under the BREEAM assessment which would apply to non-residential development (para 11.53).

Agree, there are higher standards in some of the Area Action Plans which should be recognised in the SPD.

Add text to paragraph 11.53 to refer to higher standards in some Area Action Plans, as follows:
"Some areas of the district have higher standards (see the relevant Area Action Plans for details)."

Use Sustainable Drainage Systems

25581 - Anglian Water Services Limited (Mrs Amie Lill) [10900]

Support We are pleased to see references made to the use of sustainable urban drainage systems (SUDS) which follows Anglian Water's policy of surface water separation and onsite surface water management and attenuation.

Support noted.

No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>11.68</i>				
26503 - Cambridgeshire County Council (Mrs Wendy Hague)	Object	This paragraph duplicates the text in the second sentence of paragraph 11.66. It is therefore suggested that it should be deleted for clarity. (para 11.68).	Noted and agreed	Paragraph 11.68 deleted.
26452 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	The naturalistic appearance of ponds and basins is not always desirable as they may deliberately be alien to their surroundings forming for example part a piece of land art as part of a public art strategy within a development. Paragraph 11.68 should be amended as follows:"Where basins and ponds are to be incorporated, they should either be designed to appear as natural as possible (with contours designed to blend into the landscape, and with different margin depths and shelves to maximize opportunities for the enhancement of biodiversity) or form part of a wider landscape design strategy that may introduce alternative or alien forms into the landscape."	Noted.	Paragraph 11.68 is to be deleted to remove duplication with paragraph 11.66. Amend the 2nd sentence of paragraph 11.66 as follows: "Where basins and ponds are to be incorporated, they should be designed to appear as natural as possible, (with contours designed to blend into the landscape, and with different margin depths and shelves to maximise opportunities for the enhancement of biodiversity) or form part of a wider landscape design strategy that may introduce alternative forms into the landscape depending upon the context."
<i>11.76</i>				
26584 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Delete 9th bullet. The use of drought-resistant planting (xeriscaping) is not an element of managing flood risk but an element of water conservation and inconsistent with the first phrase.	Noted and agreed.	Text relocated to para 11.55 (delivery options under water conservation measures)
<i>11.86</i>				
26504 - Cambridgeshire County Council (Mrs Wendy Hague)	Support	The County Council welcomes the reference made to the requirement for applicants to prepare a Resource Re-use and Recovery Scheme in relation to construction and demolition waste (para 11.86).	Support noted.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
11.90 26505 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	It is suggested that this paragraph should be amended to make it clear that Policy HG/2 of the Development Control Policies DPD requires that a proportion of new dwellings should meet Lifetime Home standards (para 11.90).	Agreed.	Amend 1st sentence of paragraph 11.90 to read: "Policy HG/2 in the Development Control Policies DPD requires a proportion of new dwellings to be designed to incorporate the Joseph Rowntree Foundation's Lifetime Homes standards."
11.91 26506 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	It should be noted that the RECAP Waste Management Design Guide includes guidance on the design and location of waste storage associated with individual dwellings (para 11.91).	Comment noted.	Amend paragraph 11.91 to read: "In addition to these items, the design and layout of new housing should also make provision for the secure storage of bicycles and discrete space for wheelie bins / waste / recycling receptacles in accordance with the RECAP Waste Management Design Guide. Further information on the provision wheelie bins and or waste / recycling provision is provided in Chapter 9 -Environmental Health - Waste / Refuse and Recycling-Operational."
11.93 26507 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	It is noted that the intention is to include Building for Life Assessments in the District Council's Annual Monitoring Report. The County Council would welcome further discussions in relation to this issue (para 11.92).	In July 2008 the Government published a new set of Core Output Indicators that District Councils must report on in their Annual Monitoring Report (Regional Spatial Strategies and Local Development Framework Core Output Indicators - Update 2/2008). The revised list includes a requirement that the level of quality in new housing development be monitored for all housing sites of at least 10 dwellings that have been completed (Indicator H6 Housing Quality - Building for Life Assessments).	Further discussions may take place in the Quarterly Monitoring meetings.

Representations***Nature Summary of Main Issue******Council's Assessment******Action******Table 11.1***

26508 - Cambridgeshire County Council (Mrs Wendy Hague)

Comment It is unclear why this table refers to Biodiversity impacts only in the context of smaller developments given that ecological assessments as well as mitigation measures would also be relevant for development at a larger scale (Table 11.1).

The guidance on biodiversity covers all types of development and the need, for example, for ecological assessments appropriate to the size and scale of development. Table 11.1 gives helpful guidance for smaller scale development but this does not suggest that biodiversity considerations do not apply to larger developments.

No change.

PART III SMALLER SCALE DEVELOPMENTS***PART III SMALLER SCALE DEVELOPMENTS***

26382 - Natural England (Ms Janet Nuttall) [6952]

Comment Your authority may wish to consider reference to protected species under the relevant sections within Part III, including Conversions, Extensions and Listed Buildings i.e. cross-reference with the Biodiversity and Ecology section of Chapter 11 and Table 19.1 in Chapter 19. It may be useful (within Table 19.1?) to include the link to Natural England's standing advice on protected species
http://www.naturalengland.org.uk/regions/east_of_england/

The text has been amended to refer to the system of legally protected species and designated sites (under UK and European law). The document is still not considered the right place to go into extensive detail about the different sites and species as it is partially covered in the Biodiversity SPD and other detailed guidance (such as can be found on the Natural England website of which details are provided). To address the issues of protected species and sites would require an entire chapter on its own and is not the purpose of this design guide. NE acknowledge that some consideration had been given to this point in the previous chapter 11 which has now been integrated with Chapter 5 to provide a more detailed focus on biodiversity within the Design Guide (rather than it being spread across the document).
Geological conservation is not being included within the document at present due to lack of expertise within the authority at present. Appropriate protection is afforded through PPS9.
Table 11.1 has been brought forward and retained to illustrate how biodiversity can be addressed within various development types (such as the referred to extensions and conversions).
Ramsar sites have not been referred to as no such sites are believed to exist with the district.

Chapter 5 has been re-written to provide more up-to-date reference to biodiversity conservation being consistent with the Biodiversity SPD, and drawing attention to other guidance.

Representations***Nature Summary of Main Issue******Council's Assessment******Action******CHAPTER 14 CONVERSIONS******CHAPTER 14 CONVERSIONS***

26398 - Papworth Hospital NHS
Foundation Trust (Mr Ken Brewer)
[2513]

Object Chapter 14 as presently worded creates some ambiguity as to the appropriateness of converting buildings which may not have architectural or historic value but from other perspectives such as economic or age make it beneficial to retain and convert and not replace. The emphasis of this chapter should be amended accordingly.

Agree, this could be clearer.

Replace the first two sentences of paragraph 14.5 with the following text:
"Policy ET/7 in the Development Control Policies DPD states that conversion of rural buildings to employment uses will be permitted subject to specified criteria being met including that the buildings are in keeping with their surroundings and that their existing characters are retained. Policy HG/8 says that conversion of rural buildings to residential use will only be accepted in exceptional circumstances and subject to specified considerations and criteria including that the buildings are in keeping with their surroundings and that their existing characters are retained."

Representations***Nature Summary of Main Issue******Council's Assessment******Action******CHAPTER 19 DESIGN DOCUMENTATION******Table 19.1***

26442 - Middle Level Commissioners (Mr Graham Moore) [6194]	<p>Comment The wording of this section is misleading and factually incorrect. Flooding is not restricted to low lying areas or areas shown on the Environment Agency Flood Map, which only shows the extent of flooding as a result of the failure or overtopping of its watercourses. Other causes of flooding include the lack of capacity within a drainage system, poor maintenance of systems, high levels of ground water, overland flows and poor ground infiltration. PPS25 and the Pitt Report require that ALL sources of flooding should be considered. Therefore this section should also refer to your Council's SFRA and Drainage Manager together with the local IDBs and other operating authorities, including landowners, who influence water level/flood risk management in the area.</p>	Valid comment, amend as suggested.	<p>Table 19.1: In the second column in the 'Risk of Flooding' row add:</p> <p>***Check the Council's Strategic Flood Risk Assessment *Check with the Council's Drainage Manager *Check with the Inland Drainage Board</p>
26510 - Cambridgeshire County Council (Mrs Wendy Hague)	<p>Object It is suggested that the text of the second sentence relating to archaeology should be amended as follows "To determine the likelihood of items of interest or features of significance being damaged or destroyed during the course of development" (Archaeology).</p>	Valid comments, amend as suggested.	<p>Table 19.1: Amend the second sentence in the third column of the 'Archaeology' row to read: "To determine the likelihood of items of interest or features of significance being damaged or destroyed discovered during the course of development."</p>
<i>Landscape Design Statements</i> 26253 - Cambridge City Council (Mrs Emma Davies) [6069]	<p>Comment The City Council has made comments to the Landscape in New Developments SPD regarding the documentation required in relation to landscape design. Consistency with both SPDs is critical to avoid confusion.</p>	Valid comment. Amend the text to ensure no conflict with the Landscape and Developments SPD.	Amend the text to ensure no conflict with the Landscape and Developments SPD.

Representations

Nature Summary of Main Issue

Council's Assessment

Action

19.21

26453 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Object

The phrase 'Landscape Design Statements' does not appear to be used in the Consultation Draft Landscape in New Developments SPD. Instead paragraph 3.11 (and elsewhere) in that document refers instead to 'Landscape Concept Plan'. These may or may not be intended to be the same document but the titling and content of documents that the local authority is expecting to receive from applicants must be consistent between SPDs and as clearly defined as possible.

Valid comment. Delete the word "statements" from the heading before paragraph 19.20.

Delete the word "statements" from the heading before paragraph 19.20.

In the first sentence of paragraph 19.21 delete "The Landscape Design Statement should" and add "Information required will typically".

Delete sub-paragraphs 1 to 7 of paragraph 19.21 and replace with the following:
"- Survey and appraisal
- Landform
- Details of utilities
- Significant landscape features; including significant trees, hedgerows, or other areas of significant vegetation (for further information see the Trees and Development Sites SPD)
- Visual qualities context
- Special designations e.g. SSSIs."

Representations

Nature Summary of Main Issue

Council's Assessment

Action

19.22

26454 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Object

The description of what Landscape Design Details should contain appears to be set out in paragraph 19.22ff. This does not appear to be consistent with paragraph 4.14ff of the Consultation Draft Landscape in New Developments SPD. The content that the local authority is expecting to receive must be consistent between SPDs and as clearly defined as possible.

Valid comment. Refer to the Landscape in New Developments SPD and provide a short summary in this document.

Amend paragraph 19.20 to read: "This should be read in the context of the Council's Landscape in New Developments SPD, where full details of the documentation required are set out. For small schemes information could be included in drawings, but most large schemes will include a series of drawings with supporting written information."

Delete paragraph 19.22 and replace with:

"Design proposals will typically include:

- *Treatment to site boundaries
- *Access and circulation
- *Areas of hard and soft landscaping
- *Significant features such as landscape structures or public art
- *Consideration of sustainability including haul roads
- *Details of proposed management."

Delete paragraphs 19.23 and 19.24 and replace with:

"19.23 Design proposals will include:

- *Plant lists with details of species
- *Specifications for hard surfaces, walls, railings and other hard materials
- *Details of biodiversity enhancement
- *Informal and formal open space,

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>19.23</i></p> <p>26244 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Object	All references to 'landscaping' within the draft SPD should be substituted with 'landscape' as this is more appropriate terminology. In addition, all references to 'theme' when talking about landscape should be substituted with 'character' to avoid misinterpretation.	Valid comment, amend as recommended.	All references to "landscaping" changed to "landscape".
<p><i>19.29</i></p> <p>26509 - Cambridgeshire County Council (Mrs Wendy Hague)</p>	Support	The County Council welcomes the reference made to a completed RECAP Waste Management Design Toolkit forming part of the submission requirements for planning applications. For clarity it should be made clear that the toolkit appears in the RECAP Waste Management Design and that it is entitled "RECAP Waste Management Design Toolkit" rather than the "Management Design Toolkit" (para 19.29).	Valid comment.	Amend paragraph 19.29 to read: "All planning applications should be accompanied by a completed RECAP Waste Management Design Guide ToolKit to allow the effective evaluation of the waste management requirements for a development. Further information on the RECAP Guide is provided in Chapter 9-Environmental Health-Waste / Refuse and Recycling-Operational."

APPENDIX 1 CONTACT DETAILS AND USEFUL ADDRESSES

APPENDIX 1 CONTACT DETAILS AND USEFUL ADDRESSES

26511 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	<p>Following reorganisation of the County Council the Environment & Transport Directorate has been replaced by Environment Services therefore the text should be amended to this effect. (Cambridgeshire County Council, Environment & Transport Directorate)</p> <p>The County Council's Historic Environment Team formerly known as the County Archaeology Office should be identified as the point of contact for archaeological planning advice and the Historic Environment Record which is the comprehensive source of information on archaeological sites and finds in the county of Cambridgeshire (Archaeology).</p>	Accepted	Change contact details in Appendix 1.
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Representations***Nature Summary of Main Issue******Council's Assessment******Action******APPENDIX 2 REFERENCES AND FURTHER READING******APPENDIX 2 REFERENCES AND FURTHER READING***

26512 - Cambridgeshire County Council (Mrs Wendy Hague)	Comment	Reference should be made to the RECAP Design Guide Draft SPD as well as the earlier version of the Design Guide which was published by the RECAP Partnership in 2008 (Urban Design).
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Comment noted.

Add reference in Appendix 2 to emerging County Council Draft Supplementary Document - Waste Management Design Guide and RECAP Partnership Waste Management Design Guide 2008.

APPENDIX 3 BIODIVERSITY GUIDANCE***APPENDIX 3 BIODIVERSITY GUIDANCE***

26385 - Natural England (Ms Janet Nuttall) [6952]	Object	Appendix 3: Biodiversity Guidance - Ramsar sites should be included as a statutory site within this table. Under UK planning policy Ramsar sites are afforded the same degree of protection as SPAs and SACs are given under the Conservation (Natural Habitats &c.) Regulations
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The text has been deleted from this chapter and merged with chapter 5 to refer to the system of legally protected species and designated sites (under UK and European law). The document is still not considered the right place to go into extensive detail about the different sites and species as it is partially covered in the Biodiversity SPD and other detailed guidance (such as can be found on the Natural England website of which details are provided). To address the issues of protected species and sites would require an entire chapter on its own and is not the purpose of this design guide. NE acknowledge that some consideration had been given to this point in the previous chapter 11 which has now be integrated with Chapter 5 to provide a more detailed focus on biodiversity within the Design Guide (rather than it being spread across the document).

Geological conservation is not being included within the document at present due to lack of expertise within the authority at present. Appropriate protection is afforded through PPS9.

Table 11.1 has been brought forward and retained to illustrate how biodiversity can be addressed within various development types (such as the referred to extensions and conversions).

Ramsar sites have not been referred to as no such sites are believed to exist with the district.

Chapter 5 has been re-written, combining text from Chapters 5 and 11, to provide more up-to-date reference to biodiversity conservation being consistent with the Biodiversity SPD, and drawing attention to other guidance.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>APPENDIX 4 AIR QUALITY: SUPPLEMENTARY DESIGN GUIDE</i>				
<i>APPENDIX 4 AIR QUALITY: SUPPLEMENTARY DESIGN GUIDE</i>				
26586 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Design Appendix Page 237 The reference should be to Circular 05/05	Valid comment.	Amend any references to Environment Circular 01/97 and refer to ODPM Circular 05/05: Planning Obligations.
26513 - Cambridgeshire County Council (Mrs Wendy Hague)	Object	Department of the Environment Circular 01/97 was replaced by ODPM Circular 05/05: Planning Obligations in 2005 therefore this quote should be replaced with suitable text from the current circular (S106 Obligations).	Valid comment.	Amend any references to Environment Circular 01/97 and refer to ODPM Circular 05/05: Planning Obligations.

Representations***Nature Summary of Main Issue******Council's Assessment******Action******APPENDIX 6 NOISE - DETAILED DESIGN GUIDANCE******APPENDIX 6 NOISE - DETAILED DESIGN GUIDANCE***

26649 - Cambridge City Council
(Mr Selwyn Anderson) [12787]

Comment 10.0: Vibration: *disagree that significant vibration is only likely to be from trains. It is more likely to be trains but additional sources could include industrial premises with equipment such as presses and guillotines generating peak particle velocities that could disturb as opposed to averaged VDVs-additional guidance.

Agree.

Amend 1st paragraph in section 10.0 in Appendix 6 to mention other likely sources of vibration as follows:
"Significant vibration within SCDC (apart from temporary construction works) is most likely to be generated by surface trains running on railway tracks throughout the district. Additional sources could include industrial premises with specific processes / equipment such as presses and guillotines generating ground borne vibration at nearby sensitive premises. Ideally, track form and wheel/rail interface would be in the optimum condition to minimise vibration generation. Road traffic is unlikely to generate any significant vibration where the road-wearing surface is in reasonable repair. A vibration assessment should be undertaken where surface railways, are within 75m to 100m of a proposed development site. The Environmental Protection Section within Health & Environmental Services can advise and give

Representations***Nature Summary of Main Issue******Council's Assessment******Action***

26648 - Cambridge City Council
(Mr Selwyn Anderson) [12787]

Comment 8.2: Ventilation requirements and Noise Insulation of Noise Sensitive Premises:
*agree with requirements and particularly important for westerly and south facing facades. Option to have openable windows with mechaical ventilation should not be considered if it may give rise to statutory noise nuisance from nearby industrial trade or business premises - difficult balance.

Important consideration.

Amend 3rd paragraph in section 8.2 of Appendix 6 to read:

"If achieving internal noise levels rely on keeping openable windows closed, then external windows will need to be sealed shut and not openable, unless background and rapid ventilation (purging) and cooling can be provided by alternative means, for example during hot summer days / nights, without the need to open external windows.

Add a new paragraph after, to read:

"It should be noted that this approach will only be considered when the external noise causing the potential adverse impact is an anonymous noise such as road traffic. Such a compromise will not be permitted when the external noise is dominated by industrial, trade or business type uses, as this may result in statutory noise nuisance legal enforcement action been taken against the noise maker, an unacceptable situation for all."

Insert an appropriately worded sentence into section 6.0 of Appendix 6.

26645 - Cambridge City Council
(Mr Selwyn Anderson) [12787]

Comment Section 6.0: Noise sensitive residential development on a site dominated by an existing industrial type noise source only: *the use of BS4142 assessment to put sites in respective NECs A to D: wording should say equivalent NEC category? significance of absolute verses relative standards should be clarified further. The mitigation needs to be acceptable to ensure a statutory noise nuisance would not be caused by the industrial, trade or business premises which may have a negative economic impact-difficult balance.

Important observation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
26438 - Cambridge City Council (Mr Selwyn Anderson) [12787]	Comment	Section 4.0 : Noise Sensitive Development proposed in a noisy environment *this section should make it clear that NECs are only applicable for new residential where a transport type noise is dominant as opposed to dominant industrial noise and use of BS 4142.	Not valid. Already addressed in section 6.0: Noise sensitive residential development on a site dominated by an existing industrial type noise source only: BS 4142 assessment of acceptability.	No change.
26644 - Cambridge City Council (Mr Selwyn Anderson) [12787]	Comment	Section 5.0: SCDC Outdoor and indoor noise level standards / criteria for Noise Sensitive Development: Table 2: Noise standards : *should include additional notes for 1. equivalent noise levels externally that would indicate when a noise insulation scheme may be necessary for a habitable room and 2. emerging WHO document Night Noise Guidelines for Europe 2009 sets out night time external noise levels.	Valid.	Insert two additional notes in Table 2 of section 5.0 in Appendix 6: SCDC Outdoor and indoor noise level standards / criteria for Noise Sensitive
26647 - Cambridge City Council (Mr Selwyn Anderson) [12787]	Comment	7.3 Demonstrating Compliance with The Noise Standard for Noisy Development *reference should be made to the fact that an overall dB(A) noise indicator alone may underestimate the true impact of tonal low frequency and impulsive noise- may need octave or third octave noise frequency	Valid comment.	Insert an additional sentence in section 7.3 of Appendix 6 as follows: "It should be noted that BS4142 and in particular the use of an overall broadband dB(A) rating level may not adequately assess the impact of acoustic features such as tonal, low frequency noise and impulsive noise. Consideration may also need to be given to any adverse increase in background octave and third-octave band noise frequency spectrums due to a specific noise source."
26650 - Cambridge City Council (Mr Selwyn Anderson) [12787]	Comment	11.0: Sound Insulation: Inside and Between Residential Dwellings *agree but reference could be made to Code for Sustainable Homes and that extra points can be awarded for achieving higher standards of sound insulation than required by Part E Technical Guidance of the Building Regulations : opportunity.	Agree.	Insert wording in section 12.0 of Appendix 6 to include reference to Code for Sustainable Homes as follows: "It should be noted that The Code for Sustainable Homes includes sound insulation under the Health and Wellbeing category. There is an opportunity to be awarded an extra 4 credits for achieving higher standards of sound insulation than required by Approved Document E -Resistance to the Passage of Sound of the Building Regulations."

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26646 - Cambridge City Council
(Mr Selwyn Anderson) [12787]

Comment Section 7.1 Noise Generating Development
Environmental Noise Standard / Criterion
*standard proposed acceptable in principle but requires
further clarification : is it the specific BS 4142 rating level
that must meet the background to minimise the 3dB max
increase? It should be noted that in exceptional
circumstances and in particluar where residential may be
a long distance away as in SCDC and when it can be
justified the 3dB limit could be relaxed from the
boundary of premises subject to the application to a
position in agreement with LPA or agreed boundary level
condition.

Valid comment.

Insert an additional paragraph at
end of section Insert an additional
paragraph at end of section 7.1 of
Appendix 6 as follows:
"Notwithstanding that the fact that
the purposes of the standard is to
protect amenity and limit
cumulative creeping background
noise levels, it is acknowledged
that in exceptional circumstances
and in particular where residential
may be a long distance away from
the application site, the 3dB limit
increase at the boundary of
premises subject to the application
could be relaxed to an alternative
appropriate position / distance in
agreement with LPA or as an
agreed boundary noise limit. This
will depend on local
circumstances, the character of
the area and when it can be
justified by the applicant."

Landscape in New Developments Supplementary Planning Document

Public Participation Report

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>CHAPTER 1 INTRODUCTION TO THE SUPPLEMENTARY PLANNING DOCUMENT</i>				
<i>1.1</i>				
26375 - East of England Regional Assembly (Paul Bryant) [6829]	Comment	<p>SCDC's 'Landscaping in New Development SPD' sets out guidance on when landscaping schemes will be required, what they should cover and when / how they should be submitted. It suggests that good landscape schemes should be viewed as an asset to development proposals, the local community and the wider landscape through, for example, increasing biodiversity, creating opportunities for community involvement and being sustainable through their choice of planting and their use of water resources. This SPD is consistent with regional policy, in particular, policies SS1, SS8, ENV1, ENV3 and ENV5.</p> <p>The Regional Planning Panel Standing Committee considered a report at its meeting on 6 November 2009 before endorsing the recommendation that the Landscape in New Developments Supplementary Planning Document is in general conformity with the East of England Plan.</p>	Noted	No change
26585 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Comment	<p>We discussed the Consultation on SPD's at our last Parish Council meeting and the consensus was that there was an awful lot of paperwork for applicants and developers to read.</p> <p>Some of the documents such as the Landscaping are quite repetitive and it was felt that money would be well spent on employing professional editors to go through the documents to consolidate them and make them more effective whilst not changing their overall meaning.</p>	Noted. We have tried to keep the documents to a manageable size, and while there is crossover with other SPDs It is felt that the Landscape SPD should be able to contribute on its own merits for the majority of landscape applications.	No change
<i>1.2</i>				
26257 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	<p>The document is very thorough in its coverage of the level of detail required from landscape submissions. However, it is felt that it attempts to achieve too much, and that the objective of the SPD should be to succinctly inform the reader of what landscape information should be submitted to SCDC. In addition, the SPD should be able to be read by a broad and diverse audience not necessarily acquainted with landscape issues.</p>	Noted. We have tried to keep the to a manageable size, and while there is crossover with other SPDs it is felt that the Landscape SPD should be able to contribute on its own merits for the majority of landscape applications. Changes in response to comments will attempt to keep the document as public friendly as possible.	No change.

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Representations

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1.3

Representations

26387 - Natural England (Ms Janet Nuttall) [6952]

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Comment The guide should refer to the Cambridgeshire Green Infrastructure Strategy and demonstrate its commitment and support to individual projects where relevant. The strategy is currently being reviewed.

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Noted and Text on GI expanded.

Action

Text added after 3.81:

GREEN INFRASTRUCTURE
Green Infrastructure describes a network of public open spaces, routes, wildlife habitats, landscapes and historic sites. It includes a wide range of elements such as rivers and watercourses, country parks, historic landscapes, archaeological sites and rights of way, and combines a range of functions.

Green Infrastructure provides an essential environmental foundation and support system to a high quality natural, historic and built environment. It is key to creating places that are attractive, healthy and give a good quality of life, and delivers a range of other social, economic and environmental benefits.

Green infrastructure plays an important role as part of both existing and new communities at county, district and neighbourhood scales.

Within new developments, Green Infrastructure should be a fundamental part of the design and planning process from the start, and be fully integrated with the development and its setting. In existing communities it should manage, protect, enhance and add to existing green spaces and other environmental and historic resources. Green Infrastructure within both new and existing developments should provide links to wider green infrastructure networks.

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The provision of Green Infrastructure is supported at national and regional, levels and is in PPS 12: Creating strong, safe and prosperous new communities through spatial planning Natural England's Green Infrastructure Guidance (2009) and CABE's Grey to Green (2009). Green infrastructure is also included in the East of England Plan (May 2008).

At a local level Green Infrastructure elements and approaches are supported and described in Local Development Documents such as Area Action Plans, the Development Control Policies DPD and Site Specific Policies DPD, as well as a number of Supplementary Planning Documents eg, Landscape, Biodiversity.

In 2006 Cambridgeshire Horizons and partners (including South Cambridgeshire District Council) produced the first Green Infrastructure Strategy for the Cambridge Sub-Region. This Strategy and its results have been reviewed and a new strategy is currently being prepared which will cover the whole of Cambridgeshire. Other planned work will identify the costs of green infrastructure and mechanisms for funding including through development.

The District Council strongly supports the planning, delivery and management of green infrastructure as an essential part of new development and crucial to its success. Cambourne and Trumpington Meadows are

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26554 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 1.3 This statement should include a reference to PPG17.	Agree, it would be useful to include reference to PPG17 Planning for Open Space, Sport and Recreation.	examples of the successful provision of green infrastructure as part of new developments and their settings. They show how it can deliver a number of specific objectives including sustainable drainage and flood management as well as creating attractive places and encouraging people to walk, cycle and enjoy their surroundings. Add reference to PPG17 in paragraph 1.3.
26262 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Suggest that the second sentence is reworded to read "These planning documents promote sustainable well designed and high quality landscapes that are fully considered at the outset and fully integrated into each development".	Noted.	Paragraph 1.3 amended to read: "These planning documents promote sustainable well designed and high quality landscapes that are fully considered at the outset and integrated into each development."
<i>1.4</i>				
26255 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	We believe that South Cambridgeshire should not be too timid about demanding the highest standard of landscape design and implementation. The phrase "good" when referring to landscape schemes can be misinterpreted. We would suggest that this is changed to "high quality", with either a footnote or glossary entry explaining what the term means, which may be "a landscape which is well designed and appropriate to the anticipated use. It will prove robust and easy to maintain and contain high quality materials and be implemented to high standards".	Noted. Landscapes are referred to as 'high quality' within the document and this term is explained. 'Good' is more reader friendly in some instances.	No change
<i>1.5</i>				
26254 - Cambridge City Council (Mrs Emma Davies) [6069]	Support	We fully support the creation of the Landscape in new Developments SPD. It is a comprehensive document, which will advise and help the delivery of new development within the district.	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
26386 - Natural England (Ms Janet Nuttall) [6952]	Support	Natural England supports the aims and principles of this SPD in seeking to conserve and enhance landscape character and to protect and enhance biodiversity through development. We support the list of issues to be covered in a landscape scheme, including protection of established trees and landscape features, biodiversity issues and habitat creation and sustainability.	Noted	No change
<i>1.7</i>				
26263 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	We would suggest that topography is added to the list of considerations.	Noted. Topography is covered in other parts of the document, including 3.1 and chapter 4.	No change.
26256 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	All references to 'theme' when talking about landscape should be substituted with 'character' to avoid misinterpretation. All references to 'landscaping' should be substituted with 'landscape'.	Noted. 'Theme' and 'Character' are different and can exist together, so retained.	All References to 'landscaping' replaced with 'landscape'.
26370 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	A further bullet point should be added to read "Assist applicants' understand the importance of high quality design".	Noted. This is covered at 1.7 bullet point 1.	No change.
26372 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Third bullet point, add 'landscape' before 'information'.	Agree.	Text amended at paragraph 1.7, bullet point 3 to read: "To guide applicants through the planning process by informing them of what landscape information is required to accompany their planning
26252 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	First Bullet: Amend to read "...the role 'of' a..."	Noted	Text amended at paragraph 1.7, bullet point 1 to read: "Assist applicants' understanding the role of a landscape scheme to both the actual site and to the wider landscape as part of a high quality design."
26371 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	First bullet point, 'role' should be changed to 'function of'.	Noted.'Role' encompasses more than 'Function of'.	No change.

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<p><i>1.8</i></p> <p>26368 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Object	The third and fourth bullet points could usefully be combined to read "To conserve and enhance biodiversity and achieve a net increase".	Agree.	<p>Combine third and fourth bullet points to read:</p> <p>"To conserve and enhance biodiversity, and achieve a net increase."</p>
<p>26369 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Object	The final bullet point should be amended to read "Early identification of major development locations to allow for adequate provision of landscape and biodiversity features on site".	Noted, but identification of location is different to identification of landscape requirements.	<p>Text amended at paragraph 1.8, bullet point 7 to read:</p> <p>"The major development locations are also required to identify early provision of landscaping and biodiversity features."</p>
<p>26264 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Object	Second sentence, change 'theme' to 'objectives'.	Agree.	<p>Text amended at paragraph 1.8 to read:</p> <p>"The key objectives arising from these policies are summarised as follows:"</p>

Representations**Nature Summary of Main Issue****Council's Assessment****Action****CHAPTER 2 WHY A LANDSCAPE SCHEME IS NEEDED****CHAPTER 2 WHY A LANDSCAPE SCHEME IS NEEDED**

26265 - Cambridge City Council
(Mrs Emma Davies) [6069]

Object The title of this chapter could possibly be amended to read "Why a High Quality Landscape Scheme is Needed".

Noted. The need for high quality is stressed throughout the document.

No change.

2.4

26329 - Great Shelford Parish
Council (Mrs Bridget Hodge)
[3518]

Comment Landscaping can also provide opportunities for residents to do their own gardening for example in Hammerby in Stockholm small veg plots are provided within a dense urban setting.

Noted.

Add two new paragraphs after 3.64 to read as follows:

Allotments
Demand for allotments is growing, and large-scale housing applications often require space for allotments as part of the social infrastructure provision. Allotments can not only provide food for the household, but also benefit the community by encouraging physical exercise, healthy eating, and community interaction.

In addition to the traditional allotment plot, a well thought out landscape scheme can offer a number of opportunities for residents to grow their own food in even the smallest developments. These can include:

* Roof gardens and green walls

* Raised beds and container areas

* Opportunities to grow food in schools, hospitals and care homes

* Temporary allotments on land parcels awaiting development - This is of particular relevance to major schemes where land in the

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26261 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Bullet point g): it is felt that many more references should be made to SUDs throughout the document, as this element will be an influential element in landscape design. For example, it needs to be made clearer that SUDs will require a significant amount of landscape space to allow them to function properly.	SUDS are covered at 3.74 - 3.78 and Appendix 2 which has links to the Cambridge City Council 'Design and Adoption Guide for Sustainable Drainage Systems', the Anglian Water 'Guidance on the use of Sustainable Drainage Systems (SUDS) and an Overview of the Adoption Policy' and the SCDC Biodiversity SPD.	Text amended at 2.4 (g): 'for example by providing space for Sustainable Drainage Systems, reducing replanting or maintenance requirements.'
26557 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 2.4, Bullet d) d) To Add maturity to developments - The retention of high quality existing Landscape Features combined with a good standard of new planting and materials can add maturity to a new development. Replace: good with high quality	Noted	Text amended at 2.4 (d): 'To add maturity to developments - The retention of existing landscape features such as established trees and hedgerows, combined with a high standard of new planting and materials can add character and maturity to a new
26269 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Bullet point f): Suggest that this bullet point is amended to read "Enhance Biodiversity - hard, and more often soft, landscape can provide a wide range of habitats and greatly enhance the biodiversity of a development. For example, by providing indigenous and non-indigenous food plants for wildlife or nesting/roosting opportunities	Noted. 'Native' is probably more reader friendly than 'indigenous'.	No change.
26266 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Suggest that the first sentence is amended to read "A well designed and executed landscape will become an asset to the community, contributing to the quality of life for the people who live and work in the area".	Agree.	Text amended at 2.4 to read: 'A well-designed and executed landscape scheme can become an on-going asset to the community, contributing in a wide variety of ways.'
26267 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Bullet point c): Suggest that this bullet point is amended to read "Reduce the adverse impact of development - Landscape can help to integrate the development into the local environment and can provide visual screening, softening and mitigation of negative visual effects of development".	Noted.	Text amended at 2.4 (c): 'To reduce the visual impact of development -The landscape scheme can help to integrate the development into the local landscape, and can provide visual screening, softening and mitigation of negative visual effects.'

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26268 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Bullet point d): Suggest that this bullet point is amended to read "The retention of existing landscape features such as mature trees combined with a high standard of new planting and materials add character and maturity to a new development".	Noted.	Text amended at 2.4 (d): 'To add maturity to developments - The retention of existing landscape features such as established trees and hedgerows, combined with a high standard of new planting and materials can add character and maturity to a new
26270 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Bullet point i): Suggest that the title of this bullet point is amended to read "Enhance every day life". Would also suggest that 'and health' is added to the end of the first sentence.	Noted	Text amended at 2.4 (i): 'To provide a 'feel good factor' - Many of the benefits outlined above can combine to greatly enhance everyday life, and can have a positive effect on health. They will also enhance the desirability of the development.'
25569 - Anglian Water Services Limited (Mrs Amie Lill) [10900]	Support	Thank you for giving Anglian Water the opportunity to comment on this consultation. To enhance sustainability within the development - AW very much supports the requirement to allow space in development design to allow for sufficient sustainable urban drainage systems (SUDs). The use of SUDs is key in managing surface water and effective flood risk management.	Noted.	No change.
2.7				
26558 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 2.7 "A high quality landscape scheme will contribute to the increasing range of urban and suburban developments in South Cambridgeshire, as well as to the more rural settings. It is important that the scheme should sit well within its locality - responding both to the surrounding buildings, planting or local street scene, and to the wider Landscape Character of the area." Delete: sit well is duplicated Replace: adjacent with surrounding	Noted - Adjacent refers to the local area so retained.	Text amended at 2.7 'It is important that the scheme should sit well within its locality'

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<p>2.8 26271 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Object	Suggest change to "The landscape character of an area will greatly influence a landscape scheme. The design of a landscape will respond to the local landscape character, including topography, vegetation cover, existing boundary treatments etc."	Noted.	<p>Text amended at 2.8:</p> <p>'The Landscape Character of an area can greatly influence the design of the scheme. A more detailed description of Landscape Character is included below at Chapter 3 and Appendix 2.'</p>
<p>2.9 26330 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]</p>	Comment	This section is rather wordy and could be condensed.	Noted.	<p>Text amended at 2.9:</p> <p>'Whatever the scale of the landscape scheme it should be of a sufficient size to function correctly, and be robust, safe and pleasant to use. Trees and plants should have sufficient space to grow without overcrowding or the need for excessive maintenance. The scheme should complement the adjacent landscapes and land uses.'</p>
<p>26272 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Object	Suggest change to "Whatever the scale of the landscape it should be of a sufficient size to function correctly; it should be robust, safe and pleasurable to be in. Trees and plants should have enough space to grow without the need for future intervention through pruning and it should complement the adjacent landscapes and land uses."	Noted.	<p>Text amended at 2.9:</p> <p>'Whatever the scale of the landscape scheme it should be of a sufficient size to function correctly, and be robust, safe and pleasant to use. Trees and plants should have sufficient space to grow without overcrowding or the need for excessive maintenance. The scheme should complement the adjacent landscapes and land uses.'</p>

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26400 - Papworth Hospital NHS Foundation Trust (Mr Ken Brewer) [2513]

Object
Objection to this paragraph on the basis that the criteria as listed appears to be illogical. An example is b) which refers to "where development includes external works". Clearly, the circumstances of each application will differ and there will be instances where this would not be required. An example might be where an application is for the provision of a fire escape where there would be no requirement for a landscaping scheme. The list should be reduced to one or two examples which make it clear when a landscaping scheme would be required to accompany a planning application and where a condition would require a landscaping scheme.

Noted.

Text amended at 3.1:

'Some examples of when a landscape scheme may be required as part of the planning application are described below.'

3.2

26559 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment
Paragraph 3.2
"Even the most basic of landscape schemes will benefit greatly from time and thought to both the practical points - does the scheme conflict with planning policy? How large will the specified trees grow? To the wider implications of the proposal - for example does the scheme complement or improve the local or regional landscape character?"

Agree.

Text amended at 3.2:

'Even the most basic of landscape schemes will benefit greatly from time and thought to both the practical points - does the scheme conflict with planning policy? or How large will the specified trees grow?'

Delete: How safe will the site entrance be?
As this is predominantly an engineering issue and not a landscape one.

26331 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]

Object
Replace this para with 'even the most basic of landscape schemes will benefit from time and thought given to the following points'.

Noted. Although perhaps wordy, the paragraph serves as an introduction to the list.

No change.

3.3

26273 - Cambridge City Council (Mrs Emma Davies) [6069]

Comment
Bullet point g): Suggest the addition of reference to street furniture and boundary treatments.

Noted.

Text amended at 3.3 (g):

'Hard landscaping - paving, street furniture, walling and fencing materials.'

Representations

26274 - Cambridge City Council
(Mrs Emma Davies) [6069]

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Comment Bullet point I): Landscape Specification needs to be

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Noted. To be defined in Chapter 4.

Action

Replace paragraphs 4.26-4.29 with the following:

**MAINTENANCE SPECIFICATION
& LANDSCAPE MANAGEMENT
PLAN**

4.26 Proposals for maintenance and landscape management may be included on the design details drawings, or more usually as part of a written landscape Specification, together with a supporting plan.

4.27 For public spaces the applicant is normally responsible for maintenance of the landscape for a minimum of one year after the scheme is completed, but in many cases this will be extended to five years. For very large Landscape schemes - for new communities or for establishment of major green spaces - a maintenance period of ten or more years may be required.

4.28 The maintenance specification will typically include a description of the work to be carried out, the standards required, the frequency of maintenance visits and the quantities of the landscape to be maintained

4.29 Typical landscape maintenance issues will include:

- * Watering to establish new planting, trees and grass areas, and maintain good growth.
- * Weeding of planting areas and topping up mulches - a good choice of plant material and a high standard of implementation will assist here. Application of herbicides should be kept to a

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defined.

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minimum.

- * Formative pruning of trees, cutting back and pruning of shrubs and herbaceous plants according to species.
- * Thinning of planted areas to allow unrestricted growth.
- * Replacement of dead or failing trees, plants and grass areas.
- * Mowing of lawns, informal grass and meadow areas.
- * Adjusting ties, stakes and guards and replacement as necessary.
- * Maintenance of special landscape features such as Sustainable Drainage Systems, ponds or boardwalks.
- * Maintenance of hard surfaces including patching or re-roiling (e.g. hoggin or gravel areas) as re-pointing of block or stone areas.

- * Maintenance of street furniture, fencing and landscape lighting.
- * Litter collection.

4.30 On larger or more complex schemes, particularly if implementation of the proposals covers a considerable period of time (for example a major housing development or the creation of a country park) the applicant should provide a Landscape Management Plan. This will describe the long-term goals of the landscape scheme and how these will be achieved, in addition to the regular maintenance tasks.

4.31 Typically the landscape Management plan will cover the following areas:

- * Describing the overall vision for the scheme.
- * Securing long term management of the landscape to enhance and

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
				<p>sustain the character of the development and its setting.</p> <p>* Identifying the time frames required for each stage of the management programme - for example the Establishment period (say years 1-5), Maturation period (years 6-15) and long term mature period (Year 16 onwards) - and the essential tasks required within each.</p> <p>* To identify and describe 'one off' or occasional works which nevertheless may involve considerable expertise and expense - the dredging of a lake or major works to veteran trees for example.</p> <p>* To ensure through proactive management that foreseeable risks to the users of the landscape are maintained at reasonable, low levels.</p> <p>* To monitor the progress of the scheme, which may also include amending and priorities and targets as the landscape matures over time.</p>
26275 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Bullet point m): We feel it is important to clearly define the difference between landscape maintenance and landscape management - maintenance is the everyday operations needed to tend a landscape scheme in order for it to establish and flourish and to keep in tidy, e.g. cut the grass, pick up the litter. Management is the long term management of a landscape.	Noted - see also 4.26 - 4.31	New text added after 3.3 (j): 'Landscape management
26333 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Comment	Include in this section vistas as in Circ 11/95 - sometimes leaving out landscaping can be as important	Noted. This is covered by paragraph 3.3 points a and c.	No change.
26332 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Comment	Could schemes for onsite recycling also be included e.g. compost bins for leaves. Lots of people seem to be 'allergic' to fallen leaves - if there is somewhere to put them there will be less demand for trees to be pruned or felled.	Noted. The provision of recycling facilities is probably not a landscape issue (although landscape treatments to recycling facilities are).	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
26401 - Papworth Hospital NHS Foundation Trust (Mr Ken Brewer) [2513]	Object	<p>Paragraph 3.3 k) suggests that applicant's should appoint "competent professionals such as a landscape architect and landscape contractor". While we recognise that in the majority of proposals it is advantageous to employ the services of a professional, we wish to object to this text and suggest that it is amended accordingly. This is on the basis that in the first instance the definition of 'competent professional' is not clarified and secondly that such a requirement is outside the remit of the local planning authority.</p> <p>The text should be amended to state that "it is recommended that the applicant should consider employing the assistance of a landscape architect or landscape contractor"</p>	Noted - This point is covered in the first paragraph at 3.3.	Text amended at 3.3 (k): "Staff issues - appointing professional services such as a landscape architect and landscape contractor."
<p><i>3.4</i></p> 26560 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Paragraph 3.4 "p) Compliance with professional codes and environmental policies".</p> <p>Delete: for example BS 5837 2005 Trees in Relation to Construction. As this is neither a professional code nor an environmental policy</p>	Noted.	Paragraph 3.4 (p) amended: 'Compliance with relevant national standards, for example BS 5837 2005 Trees in Relation to Construction.'
<p><i>3.10</i></p> 26276 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Omit "Most" from title. Suggest that the second sentence is amended to read "The will be a topographical survey showing features such as trees, hedges and other vegetation, prominent landscape features, boundary treatments, water bodes, public rights of way, changes in level, buildings and structures.	Noted. Not all schemes will require a survey plan.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.11				
26540 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	The explanation of the circumstances under which a tree survey to BS 5837 2005 is required is wholly unclear. The meaning and intent of paragraphs 3.10 and 3.11 is not at all clear especially when for a robust environmental assessment, sufficient surveys need only to be undertaken in order to identify the main environmental effects. It is suggested that paragraph 3.11 is deleted and replaced with the text of paragraphs 3.9 and 3.10 from the Trees & Development Sites SPD and a	Noted - Links added to survey information	Text amended at 3.11 - 3.12 Reference to BS 5837 2005 removed at 3.11 Text added after 3.11: "For further information regarding tree and habitat surveys see the 'Trees and Development Sites SPD', paragraphs 3.10, 3.11 and Chapter 4, and the 'Biodiversity SPD', paragraphs 3.7 and 3.16."
3.12				
26544 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	The phrase 'Landscape Concept Plan' does not appear to be used in the Consultation Draft District Design Guide SPD. Instead paragraph 19.20 of that document refers to 'Landscape Design Statements'. These may or may not be intended to be the same document but the titling and content of documents that the local authority is expecting to receive must be consistent between SPDs and as clearly defined as possible. As a result of these comments on paragraph 3.12 there may be consequential amendments to paragraph 4.5 of the Landscape in New Developments SPD and the Validation Checklist for planning applications.	Noted	Review compatibility with the Design Guide SPD
26277 - Cambridge City Council (Mrs Emma Davies) [6069]	Object	Suggest change to "... will require a landscape concept plan describing the proposed vision for the landscape of the development. The concept plan will be supported by additional written material as part of the Design and Access Statement."	Agree.	Text amended at 3.12: 'The concept plan will be supported by additional written material, for example as part of Design and Access Statement.'
3.13				
26278 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Add Management Plan to the list of requirements.	Noted.	Text amended at 3.13 - 'Landscape management' added.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.16 26399 - Papworth Hospital NHS Foundation Trust (Mr Ken Brewer) [2513]	Object	<p>Paragraph 3.16 follows the commentary provided regarding the level of detail required for different types of planning applications. The first sentence of paragraph 3.16 states that,</p> <p>"A detailed planting and hard landscape scheme is normally required, either prior to determination, or as a condition of the consent."</p> <p>Objections are raised to this paragraph based on the fact that the sentence does not make it clear at what stage the detailed planting scheme will be required. We would suggest that the sentence be amended to read as follows,</p> <p>"A detailed planting and hard landscape scheme is normally required as a condition of the consent".</p>	Noted. In some instances the landscape is the key element of the development and detailed plans will be required before determination. In other cases a landscape condition will suffice.	No change.
3.17 26335 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Support	The Parish Council strongly supports this proposal as they will be able to have an effective input into landscaping schemes.	Noted.	No change.
3.20 26336 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Comment	Often landscaping in say 70's housing estates is poor, with over maintained trees therefore it may be best not to refer to what is already there but to establish a high quality sustainable landscape independent of the 'local	Noted	Text amended at 3.20: Replace 'local character' with 'the local landscape character'
3.21 - Landscape Character Assessment 26388 - Natural England (Ms Janet Nuttall) [6952]	Support	We welcome the use of the Landscape Character Assessment to inform the design and implementation of the landscape scheme within new development.	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>3.24 - Landscape Character in South Cambridgeshire</i>				
26561 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.24 The figure illustrating character areas within the East of England would benefit from having the district boundaries identified on it. The image also requires a title and image reference, a source and the copyright to be identified.	Noted	The image will be amended and referenced.
<i>3.28</i>				
26337 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Comment	With large developments we need to be more positive about the benefits of large trees and state that sufficient space should be allocated for their long term well being in all developments.	Noted.	No change.
<i>3.34</i>				
26338 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Comment	Mention should be made here of the need for permeable paving to avoid excessive run off.	Noted. Permeable paving is covered as part of SUDS.	Text strengthened with reference to SUDS at 3.77. "The applicant must ensure that sufficient space is made available within the landscape scheme, both at a domestic level (provision of water butts, green roofs or soakaways) and for larger scale development (for example permeable car parks, swales and attenuation ponds)." Also links to SUDS documents: SUDS are covered at 3.74 - 3.78 and Appendix 2 which has links to the Cambridge City Council 'Design and Adoption Guide for Sustainable Drainage Systems' (which references PPS25 and the F&WMB at page 22), the Anglian Water 'Guidance on the use of Sustainable Drainage Systems (SUDS) and an Overview of the Adoption Policy' and the SCDC Biodiversity SPD.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
3.42 26279 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Would suggest the use of "Best practice" instead of "Guidance" as the developer should have the impression that a specification is optional. Add the National Plant Specification to the list. This section should also include a summary of SCDC inspections and enforcement protocols on landscape implementation.	Noted. Some advice is published as 'guidance' some as 'best practice'. Monitoring is covered at 3.45.	Text amended at 3.42 - 'The National Plant Specification'
26563 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.42 "Guidance for the implementation of hard and soft landscape elements may be covered by a range of Specifications. Bodies such as National Building Specification (NBS), The Landscape Institute and The Arboricultural Association produce Guidance Notes and 'Best Practice' guides covering many areas of landscape work." Delete: 'CABE' and replace with National Building Specification (NBS) CABE is not recognized as a body dealing with such specifications. NBS (in particular landscape) should replace CABE as they are a recognized standard of specification for most building contracts.	Noted.	Text at 3.42 amended: 'CABE' deleted, 'National Building Specification' added
3.47 26564 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 3.47 "A robust Management plan, budget and Aftercare programme will be essential to the successful establishment and development of the landscape scheme, and management and aftercare requirements should be designed into the proposals rather than applied at the end of the design process." Insert: budget The budget for after care and maintenance is essential for establishment and long term viability of any landscape scheme and can easily be overlooked as this will normally equate to more than the construction cost over the life of a scheme.	Noted. Budget covered at 3.48.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>3.49</i> 26445 - Middle Level Commissioners (Mr Graham Moore) [6194]</p>	Support	The Board would promote maintenance access strips beside water level/flood management features as an example of best practices even to those channels that are not 'protected'.	Noted.	No change.
<p><i>(5) Encouraging Biodiversity</i> 26390 - Natural England (Ms Janet Nuttall) [6952]</p>	Support	Natural England welcomes the proposal to incorporate biodiversity into the landscaping scheme as far as possible through the inclusion of multi-functional green spaces, green corridors and watercourses which will provide additional benefits such as public access and drainage. The inclusion of native planting schemes and the consideration of design and mitigation details to minimise impacts and maximise opportunities for biodiversity is strongly supported. We welcome the proposal to require the provision of nest boxes, wildlife shelters and improved access routes and links in all new development. Leaving gaps beneath garden fences for small mammals is one example of careful but simple design having the potential to have significant benefits for wildlife.	Noted.	No change.
<p><i>3.53</i> 25570 - Anglian Water Services Limited (Mrs Amie Lill) [10900]</p>	Support	<p>Thank you for giving Anglian Water the opportunity to comment on this consultation.</p> <p>AW very much supports the requirement of multi-functional well designed features in large developments. The use of SUDs is key in managing surface water and effective flood risk management. Integrating them with the landscape design adds amenity for the community as well as bringing biodiversity value.</p>	Noted.	No change.
<p><i>3.55</i> 26281 - Cambridge City Council (Mrs Emma Davies) [6069]</p>	Object	We are concerned about the use of green walls in any cross boundary development as they are not sustainable and are an extremely high maintenance feature.	Noted. 'Green Walls' can refer to not just the prestige, high maintenance structures, but also to a number of different techniques, from support for climbing plants (as shown) to filled gabions and crib walls, which will not require excessive maintenance.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>3.64 - Effective Protection of the Environment</i>				
26202 - Cambridgeshire County Council (Mr Chris Blackman) [3200]	Support	Archaeology and the Historic Environment are appropriately referenced in this document, and we welcome the positive contribution this document should make to the protection and enhancement of historic landscapes, and the setting of Heritage Assets.	Noted.	No change.
<i>3.70</i>				
26340 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Comment	This is a good point especially as photo voltaic panels are likely to be of increased importance in the future. It ought to be highlighted in the landscaping requirements at the beginning of this document.	Noted.	No change.
<i>3.71</i>				
26566 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	<p>Biofuels (and biomass) are, in theory, carbon neutral because they only release the carbon dioxide absorbed from the atmosphere by a plant as it grows.</p> <p>The EA report 'Biomass - carbon sink or carbon sinner?' Identifies key points which need to be considered in the production of biofuel:</p> <ul style="list-style-type: none"> - How a fuel is produced and the distance it is transported has a major impact on emissions - transporting fuels over long distances and; - Excessive use of nitrogen fertilisers which can reduce the emissions savings made by the same fuel by between 15 and 50 per cent compared to best practice. - Land use change can negate any emission savings - for example by using permanent grasslands to grow bio energy crops. 	Noted.	No change.

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26402 - Papworth Hospital NHS Foundation Trust (Mr Ken Brewer) [2513]

Object This section (3.74-3.78) advocates the use of SUDS within landscape schemes, however, the document fails to address the issues that can arise associated with the use of SUDS. Namely, the suitability of sites to accommodate this provision and the management issues. The section of the SPD titled 'Landscape Management Plan' does not in fact refer to the need to include management of drainage systems such as SUDS. Furthermore, once the scheme is complete there are often issues regarding adoption which is not covered by this SPD. We consider that this section should be reviewed accordingly.

Text will be strengthened and amended but no further action as this is beyond the scope of this SPD. SUDS are covered at 3.74 - 3.78 and Appendix 2 which has links to the Cambridge City Council 'Design and Adoption Guide for Sustainable Drainage Systems', the Anglian Water 'Guidance on the use of Sustainable Drainage Systems (SUDS) and an Overview of the Adoption Policy' and the SCDC Biodiversity SPD.

Text strengthened with reference to SUDS at 3.77.

'The applicant must ensure that sufficient space is made available within the landscape scheme, both at a domestic level (provision of water butts, green roofs or soakaways) and for larger scale development (for example permeable car parks, swales and attenuation ponds). The scheme should also include areas for statutory maintenance of the drainage system. Although for large projects, the land take required for SUDS can be considerable, many schemes can also offer an efficient multi-use of space by combining the drainage function with public open space, wildlife areas or transport routes.'

Text altered at 4.29 point 8 'drainage areas' replaced with 'Sustainable Drainage Systems'

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26342 - Cottenham Parish Council (Mrs Julie Groves) [692]	Object	Notwithstanding our support for this document CPC is surprised, given the amount of detail found generally in the text, that references to SUDS (paragraphs 3.74 - 3.78 plus Appendix 2) are less than robust. Therefore this SPD should, in the paragraphs mentioned and/or in Appendix 2, make it clear that any and all SUDS (or other drainage/water management measures) will adhere strictly to the terms of Planning Policy Statement (PPS) 25 and the F&WMB.	Some further photographs to illustrate landscape will be useful, and the text will be strengthened. No further action as this is beyond the scope of this SPD. SUDS are covered at 3.74 - 3.78 and Appendix 2 which has links to the Cambridge City Council 'Design and Adoption Guide for Sustainable Drainage Systems' (which references PPS 25 and the F&WMB at page 22), the Anglian Water 'Guidance on the use of Sustainable Drainage Systems (SUDS) and an Overview of the Adoption Policy' and the SCDC Biodiversity SPD.	Further Photographs and sketches included in Appendix 2. Text strengthened with reference to SUDS at 3.77. 'The applicant must ensure that sufficient space is made available within the landscape scheme, both at a domestic level (provision of water butts, green roofs or soakaways) and for larger scale development (for example permeable car parks, swales and attenuation ponds). The scheme should also include areas for statutory maintenance of the drainage system. Although for large projects, the land take required for SUDS can be considerable, many schemes can also offer an efficient multi-use of space by combining the drainage function with public open space, wildlife areas or transport routes.' No change.
25571 - Anglian Water Services Limited (Mrs Amie Lill) [10900]	Support	We are pleased to see references made to the use of sustainable urban drainage systems (SUDS) which follows Anglian Water's policy of surface water separation and onsite surface water management and attenuation.	Noted.	No change.
3.76 26444 - Middle Level Commissioners (Mr Graham Moore) [6194]	Support	The Board would promote maintenance access strips beside water level/flood management features as an example of best practices even to those channels that are not 'protected'.	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>3.78</i> 25574 - Anglian Water Services Limited (Mrs Amie Lill) [10900]</p>	Comment	<p>AW also has a useful adoption policy on SUDS. A copy of our policy can be viewed online using the following link: http://www.anglianwater.co.uk/developers/sewer-connection/349415E282EB48B6A6148024F3BDF1F.aspx</p> <p>We wish to promote a strategic view of surface water management at the right time in the planning process. Through the joint working of a Water Cycle Strategy as part of the formulation of the Local Development Framework, we envisage the promotion of large scale SuDS schemes servicing proposed development sites. Such strategic surface water solutions can provide multiple benefits; more robust mitigation to potential flood risk, potential biodiversity and amenity value.</p>	Noted.	Link to Anglian Water adoption policy added at Appendix 2.
<p><i>3.81</i> 25575 - Anglian Water Services Limited (Mrs Amie Lill) [10900]</p>	Support	<p>Thank you for giving Anglian Water the opportunity to comment on this consultation.</p> <p>Again AW supports the use of SUDs. The opportunity is there to incorporate them throughout the development to ensure effective surface water management. These integrate well with landscape design to add amenity for the community as well as bringing biodiversity value.</p> <p>Attenuation on site and taking out surface water from combined systems wherever the opportunity arises is strongly advised and expected as part of sustainable re-development. Opportunities will be available and the council should insist of sustainable surface water management on all new development.</p>	Noted.	No change.

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26282 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Suggest that this title be amended to read "Topographical Survey and Appraisal Plan", with sub-headings used to illustrate the difference between the topographical survey and the site appraisal information. It is felt that the list of landscape elements to be covered by the survey should be in the form of one simple list.	Noted. Sub-sections added. The present text will cover most schemes - with reference the drawing scale, note that the information can be split for complex schemes.	Text amended at 4.1 to differentiate between 'Site Survey' and 'Appraisal Plan.'
4.3 26283 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	Reference to the Trees and Development SPD could not be found in Appendix 2.	Noted.	Text amended at 4.4, bullet point 3: 'see 'Trees and Development
4.4 26568 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 4.4 "Typically the site survey plan will include the following Information:" This sentence should either be deleted or the information should be added or is this meant to appear above the bullets above this sentence under paragraph 4.3?	Noted. The sentence is in the wrong place.	Text at 4.4 moved to precede bullet points.
4.5 26569 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Comment	Paragraph 4.5 "The site survey and appraisal inform the next element of the landscape submission, the Landscape Concept Plan."	Agree.	Text amended at 4.5: 'The site survey and appraisal plan inform the next element of the landscape submission, the Landscape Concept Plan.'

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Detailed Layout</i>				
26284 - Cambridge City Council (Mrs Emma Davies) [6069]	Comment	There is some confusion about the purpose of this drawing as many of the elements described in this section are better detailed on the Landscape Masterplan. It could, therefore, be helpful to combine this section with the Landscape Masterplan.	Noted. The list of points at 4.15 is intended to cover the more detailed elements across a range of developments of different sizes. The two first bullet points could refer to a master plan scale on a very large scheme, but on smaller submissions the drawings would be fairly detailed. We did not want to propose different drawings types for developments of differing scale.	No change.
<i>4.11</i>				
26547 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	Delete the words "...of the survey..." A survey is intended to inform the design principals and should not include the design principals as this would lead to surveys being led by the design rather than being used to inform	Noted.	Text amended at 4.11: 'The Detailed Layout of the scheme will normally follow the concept plan, either as a condition of the Outline approval or as a Reserved Matters application. Unless circumstances have altered, the detailed designs should be based on the design principles of the concept plan.'
<i>4.14</i>				
26551 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]	Object	The description of what Landscape Design Details should contain appears to be set out in paragraphs following 4.14. The actual content is not at all clear. This is especially the case when comparing this text to that of paragraph 19.22ff of the Consultation Draft District Design Guide SPD. The content that the local authority is expecting to receive must be consistent between SPDs and as clearly defined as possible, including in the Validation Checklist for planning applications.	Noted	Review compatibility with Design Guide.

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26570 - Gallagher Estates and the HCA (Mr Andy Lawson) [10117]

Comment Paragraph 4.20
 "Due to the level of detail and technical information, all detailed design information, particularly plant species, should be clearly labelled using full botanical names or descriptions wherever possible. If lack of space makes extensive use of abbreviations or symbols necessary, the applicant should consider supplying the information at a larger scale or spread over more than one drawing."

Insert: Botanical
 Standard convention with regard to plant specifications is that botanical/ Latin names should always be used (and can be accompanied by common names) as this avoids confusion which can be caused by changes and variations in common names.

Noted.

Text amended at 4.20:

'Due to the level of detail and technical information, all detailed design information should be clearly labelled. Full botanical names should be used for plant species wherever possible. If lack of space makes extensive use of abbreviations or symbols necessary, the applicant should consider supplying the information at a larger scale or spread over more than one drawing.'

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Landscape Management Plan

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26285 - Cambridge City Council
(Mrs Emma Davies) [6069]

Comment The difference between Maintenance Specifications and Management Plans needs to be clearly spelt out to provide certainty. It is felt that they should be separate documents to avoid confusion, and their purpose fully explained. Please see the attached recommendations used by the City Council (Landscape Maintenance Specification and Management Plan).

Noted - Management and specification separated out

Replace paragraphs 4.26-4.29 with the following:

**MAINTENANCE AND
LANDSCAPE MANAGEMENT
PLAN**

4.26 The Proposals for maintenance and landscape Management Plan may be included on the design details drawings, or more usually as part of a written Landscape Specification, together with a supporting plan.

4.27 For public spaces the applicant is normally responsible for maintenance of the landscape for a minimum of one year after the scheme is completed, but in many cases this will be extended to five years. For very large Landscape schemes - for new communities or for establishment of major green spaces - a maintenance period of ten or more years may be required.

4.28 The Landscape Management plan maintenance specification will typically include a description of the work to be carried out, the maintenance standards required, the frequency of maintenance visits and the quantities of the landscape to be maintained

4.29 Typical landscape Management plan maintenance items issues will include:

- * Watering to establish new planting, trees and grass areas, and maintain good growth.
- * Weeding of planting areas and topping up mulches - a good choice of plant material and a high standard of implementation will

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assist here. Application of herbicides should be kept to a minimum.

* Formative pruning of trees, cutting back and pruning of shrubs and herbaceous plants according to species.

* Thinning of planted areas to allow unrestricted growth.

* Replacement of dead or failing trees, plants and grass areas.

* Mowing of lawns, informal grass and meadow areas.

* Adjusting ties, stakes and guards and replacement as necessary.

* Maintenance of special landscape features such as Sustainable Drainage areas Systems, ponds or boardwalks.

* Maintenance of hard surfaces including patching or re-roiling (e.g. hoggins or gravel areas) as re-pointing of block or stone areas.

* Maintenance of street furniture, fencing and landscape lighting.

* Litter collection.

4.30 On larger or more complex schemes, particularly if implementation of the proposals covers a considerable period of time (for example a major housing development or the creation of a country park) the applicant should provide a Landscape Management Plan. This will describe the long-term goals of the landscape scheme and how these will be achieved, in addition to the regular maintenance tasks.

4.31 Typically the landscape Management plan will cover the following areas:

* Describing the overall vision for

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the scheme.

* Securing long term management of the landscape to enhance and sustain the character of the development and its setting.

* Identifying the time frames required for each stage of the management programme - for example the Establishment period (say years 1-5), Maturation period (years 6-15) and long term mature period (Year 16 onwards) - and the essential tasks required within each.

* To identify and describe 'one off' or occasional works which nevertheless may involve considerable expertise and expense - the dredging of a lake or major works to veteran trees for example.

* To ensure through proactive management that foreseeable risks to the users of the landscape are maintained at reasonable, low levels.

* To monitor the progress of the scheme, which may also include amending and priorities and targets as the landscape matures over time.