



EQUALITY IMPACT ASSESSMENT STAGE TWO – Partial EIA





**EQUALITY IMPACT ASSESSMENT
STAGE TWO – PARTIAL Equality Impact Assessment**

Policy or function to be assessed		Is the policy/function:	
North West Cambridge Area Action Plan		NEW	EXISTING
			Yes
Lead Officer	Assessment Team	Date of Stage 2 EIA	
Sara Cass/Emma Davies	Planning Policy Team – Cambridge City Council Corporate Manager (Planning and Sustainable Communities) – South Cambridgeshire District Council	From June 2008 to February 2009	
1. In what areas has this policy/function been identified as having a differential impact ? Please give details.	Ethnicity Including Gypsies & Travellers	The document sets the framework for future developments, and addresses meeting the needs of the Black Minority and Ethnic (BME) groups particularly in terms community facilities and housing mix.	

	<p>Disability Including Mental Health</p>	<p>The document sets the framework for future developments, and addresses:</p> <ol style="list-style-type: none"> 1. The accessibility of the public realm, transport, community services and housing 2. Provides for lifetime homes to reflect age, disability and other needs 3. General health impact issues. More specific health issues including mental health, learning disabilities and physical disabilities will be addressed through the planning application process and the implementation of the development in consultation with relevant stakeholders including the Primary Care Trust.
	<p>Gender Including Transgender</p>	<p>The document sets the framework for future developments, and requires the provision of a safe environment for all people, including those who may consider themselves to be vulnerable.</p>
	<p>Sexual Orientation</p>	<p>The document addresses the provision of a safe environment for all people, including those who, because of their sexual orientation, may consider themselves to be vulnerable.</p>
	<p>Religion or Belief</p>	<p>The addresses meeting the needs of religious groups, particularly the provision of places of worship, recognising also the role of faith groups in promoting community cohesion.</p>

	<p>Age Young-Elderly</p>	<p>The document sets the framework for future developments, and addresses:</p> <ol style="list-style-type: none"> 1. The provision of a safe environment for all people, including those who may consider themselves to be vulnerable due to age, 2. Providing an accessible environment for people of all ages.
<p>2. What existing evidence, presumed or otherwise, do you have for this?</p>	<p>The main potential for adverse impacts in term of process would have been if consultation processes had not been carried out in a way that ensured that all sectors of the community or organisations representing their interests are properly consulted. All stages of consultation on the Area Action Plan have been carried out in accordance with the City Council’s Statement of Community Involvement and go beyond the minimum requirements of the Regulations for both Districts.</p> <p>With regards to the content of the Area Action Plan, there is not considered to be a differential or adverse impact in relation to the vision, objectives or policies for the development of NW Cambridge. The Area Action Plan had already gone through two previous rounds of public consultation at the Issues & Options and Preferred Options stages before the Submission AAP was finalised and no differential or adverse impacts were identified. All representations submitted during the consultation periods are properly registered on a specific database and detailed responses are agreed by Councillors for the Issues and Options and Preferred Options stages. All consultation reports, along with a Statement of Consultation, are available on both Councils’ websites and form part of a comprehensive audit trail.</p> <p>The key elements will be in the implementation of the Plan and the form of the development that comes forward through the masterplanning process and planning applications. Monitoring and review will provide a mechanism to ensure that the development itself has no differential impacts or to identify any actions necessary to ensure this.</p>	

	<p>The City Council has completed separate EqlAs for the general process of the planning application cycle, which includes the pre-application stage, receipt of planning application to determination and post determination.</p>	
<p>3. Does the policy/function meet the statutory duties to promote equality and good relations?</p> <p>If Yes, please detail how.</p>	<p>Ethnicity Including Gypsies & Travellers</p>	<p>The nature of the North West Cambridge Area Action Plan is not a direct service to a population, which will include the groups under consideration. Rather it is about a strategy that will guide the development of this area that will meet the long term needs of the University as well as Cambridge and its sub-region.</p> <p>The duty to promote can be measured through:</p> <ol style="list-style-type: none"> 1. Assessment <ol style="list-style-type: none"> a. Of the needs of the area b. Of the attitudes and views expressed through consultation 2. Consultation during the preparation of the strategy guided by the Council's Statement of Community Involvement and Regulations.
	<p>Disability Including Mental Health</p>	
	<p>Gender Including Transgender</p>	
	<p>Sexual Orientation</p>	
	<p>Religion or Belief</p>	

	<p>Age Young-Elderly</p>	<p>It has been recognised at a national level that women’s needs are not being met through the planning process (Planning Advisory Service, 2008). In order to consider this, the City Council is looking to organise an event to gather women’s views specifically. Experience with a transgender member of staff shows that we need to raise awareness in this area and we are funding training during LGBT history month in February 2009.</p> <p>The final form of the developments proposed within the Strategy should be seen to be inclusive to the needs of all City residents and the wider sub-region, within the context of the strategic priority to address the needs of Cambridge University.</p>
<p>4. What existing evidence, presumed or otherwise, do you have for this?</p>	<p>The City Council and South Cambridgeshire District Council work towards fulfilling the duty to promote through individual policies, projects and programmes which face different challenges in tackling equity issues – discrimination may occur through the process or the product or both. However, both authorities have a long established record of seeking best practice in consultation and community involvement and trying to ensure that the needs of various groups are taken into account. All staff are required to address these issues.</p> <p>We will continue to review this through:</p> <ol style="list-style-type: none"> 1. the internal analysis of the responses to consultation and outreach work; 2. publishing the results and reporting to Scrutiny Committees; and 3. in some cases the evaluation of work and the responses to consultation through a local Public Examination conducted by an independent inspector. <p>These processes take into account the nature of prior assessments, consultations and the final form of the output.</p>	

<p>5. What information can you access for this Stage 2 Partial EIA?</p> <p>Please detail.</p>	<p>The Area Action Plan has already gone through three previous rounds of public consultation at the Issues & Options and Preferred Options stages prior to the Submission of the AAP and no differential or adverse impacts have been identified. All representations submitted during these consultation periods were properly registered on a specific database and detailed responses were agreed by Councillors. All consultation reports are available on both Councils' websites and form part of a comprehensive audit trail.</p>		
<p>6. What additional information do you need?</p> <p>Please detail how to propose to get this.</p>	<p>Future equalities monitoring will be undertaken for any additional rounds of consultation on the North West Cambridge AAP. This information will help us to ensure that we are reaching all sections of the community and will also allow us to adjust our consultation methods where necessary, for example in the choice of locations for exhibitions.</p>		
<p>7. Are there any experts / relevant groups you can approach to explore their views on the issues?</p>	<p>We have consulted a number of key stakeholders and organisations, which range from Statutory Consultees such as Natural England and English Heritage to Primary Care Trusts, Parish Councils and local Residents Associations. Representative organisations for various diversity groups were also consulted, e.g. Age Concern Cambridgeshire, The East Anglian Gypsy Council, the Minority Ethnic Network of the Eastern Region, the East of England Faiths Council.</p>		
<p>8. Please list who you propose to seek the views of, and why.</p>	<p>See Appendix 1.</p>		
<p>9. How will these views be obtained?</p> <p>Please select/detail.</p>	<p>Letter</p>	<p>√</p>	<p>We informed key stakeholders and local residents of the Plan and invited representations on the various drafts of the Plan using the following methods:</p> <ul style="list-style-type: none"> - Public Notices, - Letters to statutory and general consultees as
	<p>Meetings</p>		
	<p>Interviews</p>		
	<p>Telephone</p>		
	<p>Workshops</p>		
	<p>Questionnaires</p>		

	Existing consultation forum		<p>considered appropriate to the document,</p> <ul style="list-style-type: none"> - Local Exhibitions, - Leaflets to local residents (10,000+ properties sent leaflets), - Information made available at Council Offices, Council websites and libraries across Cambridge.
	Survey		

<p>10. Please detail the views received through these processes.</p> <p>Record how and when these views were obtained.</p>	<p>See Appendix 2, which sets out the main issues raised through Issues & Options consultation, Preferred Options consultation and Submission consultation.</p> <p>These views were obtained during formal public consultation on the various drafts of the Area Action Plan. These rounds of public consultation took place on the following dates:</p> <p>Issues & Options Consultation – 25th September – 6th November 2006 Preferred Options Consultation – 22nd October – 3rd December 2007 Submission Draft Consultation – 19th May – 30th June 2008</p> <p>At all stages of consultation exhibitions were held in both the City and South Cambridgeshire, and leaflet drops in the area of the City and South Cambridgeshire adjoining the Area Action Plan site were used to inform local residents of the consultation (totalling 10,342 households). Monitoring forms were made available at the Submission Draft exhibitions in order to allow officers to see if a cross section of the community was being reached. Analysis of completed monitoring forms, of which there were 16, showed that the majority of attendees who completed a form were in the age 60+ category, closely followed by those in the 45-59 age group. There was a relatively even split between male and female attendance of the exhibitions, and all who completed a monitoring form were of white ethnicity, with the majority of these being British. This could be a reflection of the site-specific nature of the Area Action Plan and the population profile of this area of the City and South Cambridgeshire.</p>	
<p>11. In view of these responses, the outcomes of the initial screening and investigation of all other evidence and</p>	<p>Ethnicity Including Gypsies & Travellers</p>	<p>Respondents to the consultation process were keen to ensure that community services and facilities were made available early in the development of North West Cambridge to ensure their availability for all residents, both existing and in the new development.</p>

<p>information, please list any issues or concerns identified.</p>	<p>Disability Including Mental Health</p>	<p>Concern was raised during the consultation process that recreational facilities for disabled residents must be provided. There was also concern that adequate healthcare facilities also need to be provided, accessible to residents of the new development.</p>
	<p>Gender Including Transgender</p>	<p>While no specific reference to issues surrounding gender were identified as part of the consultation, officers are aware of recent research that shows that development planning and planning of new communities does not adequately consider the needs of women, for example in the ways in which women use public open space and the disparity between the location of schools, homes and other facilities in relation to centres of employment.</p>
	<p>Sexual Orientation</p>	<p>No issues surrounding sexual orientation were raised.</p>
	<p>Religion or Belief</p>	<p>Respondents to the consultation process were keen to ensure that facilities for religious worship are included in the range of services provided at the site.</p>
	<p>Age Young-Elderly</p>	<p>There were concerns raised during the consultation process that open space must be planned to ensure that there is no nuisance or disturbance to existing local residents. There was also concern raised with regards to the level of provision of “lifetime homes”.</p>
<p>12. Please assess and detail whether there is any unjustified differential or adverse impact.</p>	<p>Consultation did not highlight any unjustified differential or adverse impacts as a result of the Area Action Plan. The policies contained within the North West Cambridge Area Action Plan will be monitored on an annual basis and this should highlight any adverse impacts that might arise during the future stages of development at the site. Action can then be taken should any unjustified impacts become apparent.</p>	

<p>13. Please detail any positive actions/improvements that will be carried out to correct any differential impact, and/or to promote good relations and equality.</p> <p>Identify how these will be taken forward.</p>	<p>During the planning application process positive action can be taken to ensure that community development is provided for (through the use of planning contributions to employ community development officers) and that adequate community facilities are provided (secured through the use of legal agreements).</p> <p>In order to attract a wider audience to consultation events such as exhibitions, more use should be made of community notice boards and community newsletters, where available, to advertise such events, as some people may not necessarily respond to leaflets produced by the City Council. Depending on the nature of the document undergoing consultation, e.g. site-specific topic or City wide, this could help to attract a greater section of the Cambridge and wider community. Other methods that could heighten engagement with certain sectors of the community could include workshops with local schools or specific community groups where such events are felt appropriate or are specifically requested.</p> <p>Exhibitions tend to be run throughout the day and into the evenings in order to ensure that they can be attended by as many people as possible. Venues are also chosen that have good disabled accessibility. It may be that certain groups are unable to attend venues that are located some distance away from public transport routes, particularly after dark. The location of venues is carefully considered when planning exhibitions, although it is not always possible to ensure proximity to public transport in areas of the City where suitable venues are scarce. However this will be reviewed when planning future exhibition events.</p>			
<p>14. As a result of this partial impact assessment, is a STAGE 3 FULL EIA required?</p>	<p>YES</p>		<p>NO</p>	<p>√</p>
<p>If Yes, date set for STAGE 3 FULL Equality Impact Assessment:</p>				
<p>Signature of Lead Officer</p>	<p>Sara Cass & Emma Davies</p>		<p>Date Stage 2 EIA completed</p>	<p>24/2/09</p>

Name and Position: Planning Policy Manager and Planning Officer, Planning Policy Team, Cambridge City Council			
Stage 2 EIA checked by		Date	
Name and Position			
STAGE TWO EIA published at:			
Ongoing monitoring arrangements, and review date:			

Appendix 1: List of Consultees for the North West Cambridge Area Action Plan

Category	Organisation	
Statutory Consultees	146 x Parish Councils	
	GO-East	
	Highways Agency	
	Cambridgeshire County Council	
	East of England Regional Assembly	
	Natural England (formerly English Nature and The Countryside Agency)	
	English Heritage	
	Network Rail	
	Environment Agency	
	East of England Development Agency	
	NTL	
	Mobile Operators Association	
	The Norfolk, Suffolk and Cambridgeshire Strategic Health Authority	
	National Grid Transco Plc	
	National Grid	
	Npower Renewables	
	EDF Energy	
	Anglian Water Services	
	Cambridge Water Company	
	Cambridgeshire Horizons	
	BT Openreach Newsite	
	Uttlesford District Council	
	Forest Heath District Council	
	East Cambridgeshire District Council	
	Essex County Council	
	Hertfordshire County Council	
	Huntingdonshire District Council	
	St Edmundsbury Borough Council	
	Suffolk County Council	
	Peterborough City Council	
	Transport	Stagecoach in Cambridgeshire
	Residents Associations	Bulstrode Gardens Residents Association
Castle Community Action Group		
Clerk Maxwell Road Residents Association		
CRONC		
Gough Way Residents Association		
Huntingdon Road Residents Association		

LAMP (Leaseholders Association of Manor Place & Malcolm Place)
 Millington Road Residents Association
 NAFRA 19 Acre Field Residents Association
 New Pinehurst Residents Association
 North Newnham Residents Association
 Old Pinehurst Residents Association
 Tavistock Road & Stratfield Close Residents Association
 Windsor Road Residents Association (WIRE)
 Girton Planning Action Group

Local Strategic Partnership Cambridge Local Strategic Partnership
 South Cambridgeshire Local Strategic Partnership

Business Cambridgeshire Chamber of Commerce
 Cambridge Chamber of Commerce
 Business Link for Cambridgeshire
 The Home Builders Federation
 Confederation of British Industry - East of England
 Institute of Directors - Cambridgeshire Branch

Councillors City Councillors (x 42)
 South Cambridgeshire Councillors (x 57)
 County Councillors (for the City (x14) and South Cambridgeshire (x16))
 MPs (Lansley/Paice/Howarth)

Sports/Recreation/Tourism Sport England East
 Arts Council England East
 Sports Development Officer - Cambridge City Council
 Sports Development Officer - South Cambs DC
 The Ramblers Association

Environment/Conservation Groups Renewables East
 The RSPB Eastern England Regional Office
 The Wildlife Trust
 The British Wind Energy Association
 Cambridge Friends of the Earth
 Cambridgeshire Local Access Forum
 Cambridge Preservation Society
 Campaign to Protect Rural England (CPRE)

	West Cambridge Preservation Society
Land Owners/Developers	University of Cambridge Estates Management and Building Service NIAB (c/o Bidwells)
Additional Consultees	Royal Mail
Housing	The Housing Corporation - Eastern Region
Health Organisations	Cambridge City Primary Care Trust South Cambridgeshire Primary Care Trust Cambridge University Hospitals NHS Foundation Trust
Education	The Vice Chancellor's Office, University of Cambridge Mayfield Primary School (Head Teacher and 18 x Governors (via the Clerk of the Governors)) The Bursars' Committee
Faith Groups	Jehovah's Witnesses in Bedfordshire/Cambridgeshire Cambridge Inter-Faith Group The Church of England Ely Diocese East of England Faiths Council
Diversity (Race, Gender, Age, Disability)	Age Concern Cambridgeshire The East Anglian Gypsy Council Cambridge Ethnic Community Forum Minority Ethnic Network of the Eastern Region (MENTER) Cambridgeshire Race Equality & Diversity Service Access Officer, Cambridge City Council Cambridge Council for Voluntary Services
Community Services	Cambridgeshire Constabulary Cambridgeshire Fire and Rescue Services The East Anglian Ambulance Service
Voluntary Organisations	Transport 2000 Cambridgeshire & West Suffolk Cambridge Cycling Campaign

British Horse Society
The Bridleways Group

Appendix 2: Main issues raised at various stages of consultation**SUMMARY OF THE MAIN ISSUES RAISED TO THE ISSUES & OPTIONS REPORT**

OPTION	KEY ISSUES	PREFERRED APPROACH
Option 13.1: All purpose route within Green Corridor	<ul style="list-style-type: none"> • This would encourage people to travel by car & is not supported; • There should be no increase in general road capacity; • Should be restricted to cycling & public transport; • Would spoil the green corridor; • Contrary to the approach being advocated on the NIAB site; • Route needs to be of urban form if it is to function properly; • Will have an uncertain impact on the transport network in the NW quadrant. 	Pursue Option 13.2
Option 13.2: New all purpose route linking Madingley Rd & Huntingdon Rd	<ul style="list-style-type: none"> • There should be no increase in general road capacity; • Will have an uncertain impact on the transport network in the NW quadrant. 	Pursue Option 13.2
Option 13.3: New orbital link limited to cyclists & public transport	<ul style="list-style-type: none"> • Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical; • Slower speeds & safe crossings are required for pedestrians & cyclists; • Cycling should be given high priority with road crossings; • Draft Transport Strategy shows there is not high demand for orbital movements and new roads should be designed to serve the development while discouraging their use as an orbital route; • Draft Strategy also highlights the need for direct walking, cycling and public transport links; • Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running; • Preferred option must be based on an assessment of the evidence & input from key stakeholders. 	Pursue Option 13.2
Option 13.4: Orbital route limited to	<ul style="list-style-type: none"> • Failure to provide road capacity does not encourage use of other modes of transport by those for whom it is impractical; 	Pursue Option 13.2

OPTION	KEY ISSUES	PREFERRED APPROACH
cyclists & public transport designed with regard to slower speeds & safe crossings	<ul style="list-style-type: none"> • This denies the benefits to other drivers of reducing congestion in the City; • Draft Transport Strategy concludes orbital link should cater for all modes of transport, although will need to mitigate the desire for rat-running. 	
Option 13.5: Provision of north facing slip roads	<ul style="list-style-type: none"> • This would further exacerbate traffic problems; • This is not a sustainable approach to development; • There has never been any technical evidence to support this scheme; • Draft Transport Strategy shows the potential benefits of this scheme are negligible when compared to provision of an orbital link; • The need for such a scheme has not been demonstrated; • There are no plans to provide such slip roads; • The Council has a duty to support the provision of sustainable transport as a priority over the production of new road schemes. 	Pursue option 13.6
Option 13.6: No new slip roads	<ul style="list-style-type: none"> • This would not enhance travel links from the South Cambridge area and Cambourne in particular. 	Pursue option 13.6
Option 13.7: Cycle links	<ul style="list-style-type: none"> • Should include reference to linking cycle routes to all road links to ensure sustainable development; • Policy should state where the links are to (should explicitly state to Cambridge and all other large developments); • All cycle routes should be designated cycle paths (not shared-use) and designed to the highest Sustrans/DfT standards; • Needs to include reference to provision of secure and convenient residential cycle parking. 	Pursue option 13.7
Option 14.3: University site suitable for a secondary school	<ul style="list-style-type: none"> • It would be at the very fringe of its catchment area; • Would consume too much land; • Concern about the absence of a justification in planning terms for locating a secondary school within the North West quadrant; • Emerging preference for a site between Huntingdon Road & Histon Road; • Development does not generate the need for a new secondary school. 	Pursue option 14.4
Option 14.4:	<ul style="list-style-type: none"> • Concern about the absence of a justification in 	Pursue option 14.4

OPTION	KEY ISSUES	PREFERRED APPROACH
University site not a suitable location for a secondary school	planning terms for locating a secondary school within the North West quadrant; <ul style="list-style-type: none"> • Must be planned in conjunction with the NIAB site. 	
Option 14.5: No school playing fields to be located in the strategic gap	<ul style="list-style-type: none"> • No justification for objection given. 	Pursue neither option, however consider locating playing fields unrelated to the Secondary School in the strategic gap
Option 14.6: School playing fields in the Strategic Gap	<ul style="list-style-type: none"> • Needs to be some flexibility in relation to other uses on the site; • Would introduce urban elements inappropriate to the open space separating Cambridge and Girton; • Would object unless they are also made available for significant public usage. If not it would denote an undesirable fragmentation of public green space. 	Pursue neither option, however consider locating playing fields unrelated to the Secondary School in the strategic gap
Option 18.1: 10% renewable energy	<ul style="list-style-type: none"> • The policy is too weak; • The suggestion that housing developments could provide 10% or indeed 20% renewable energy is strongly questioned; • Renewable energy issues should not stifle regeneration and development. 	Pursue option 18.2 in combination with 18.3 & 18.4 subject to amendments
Option 18.2: 20% renewable energy	<ul style="list-style-type: none"> • Current policies require 10% and it is considered unreasonable to require a much higher target for this development; • Will local planning authorities support the provision of large wind turbines on the site; • The suggestion that housing developments could provide 10% or indeed 20% renewable energy is strongly questioned; • Renewable energy issues should not stifle regeneration and development. 	Pursue option 18.2 in combination with 18.3 & 18.4
Option 18.3: Renewable Energy & CHP	<ul style="list-style-type: none"> • The environmental advantages and financial viability of CHP are to a large extent dependant on the size and timing of demand & residential development might provide a reliable base load for CHP. 	Pursue option 18.2 in combination with 18.3 & 18.4
Option 18.4: District Heating Scheme	<ul style="list-style-type: none"> • The plan should not specify a policy requirement in advance of a feasibility study and testing; • Make it clearer that the 20% renewable energy obligation applies with a district heating scheme if it 	Pursue option 18.2 in combination with 18.3 & 18.4

OPTION	KEY ISSUES	PREFERRED APPROACH
	is found that a combined heat and power scheme is not suitable.	
Option 20.1: Storm Water Drainage	<ul style="list-style-type: none"> • Drainage plans should seek to actively decrease rainwater input to the Washpit; • Should include a statement that SuDs should not affect the SSSI and wet areas; • Does not consider the wider catchment area (catchment wide study needed); • SuDS challenged as a suitable solution. 	Pursue option 20.1 subject to amendments
Option 20.2: Maintenance of water bodies	<ul style="list-style-type: none"> • Too early to prescribe the means by which water bodies and watercourses will be managed. 	Pursue option 20.2 subject to amendments
Option 20.3: Councils to maintain water bodies	<ul style="list-style-type: none"> • Too early to prescribe the means by which water bodies and watercourses will be managed. 	Pursue option 20.2 subject to amendments
Option 20.4: Anglian water to maintain water bodies	<ul style="list-style-type: none"> • Too early to prescribe the means by which water bodies and watercourses will be managed. 	Pursue option 20.2 subject to amendments
Option 20.5: University to maintain water bodies	<ul style="list-style-type: none"> • Too early to prescribe the means by which water bodies and watercourses will be managed. 	Pursue option 20.2 subject to amendments
Option 20.6: Water conservation	<ul style="list-style-type: none"> • Policy is not strong enough (mandatory grey water recycling & rainwater capture); • Include targets for reduction of water use; • Need to ensure no adverse effects on the water environment and biodiversity. 	Pursue option 20.6 subject to amendments

SUMMARY OF THE MAIN ISSUES RAISED TO THE PREFERRED OPTIONS DRAFT AAP

Issue	Councils' Response
Site & Setting	
Objections from local residents that the Preferred Option is too limited and would result in over-development with higher densities which would adversely impact on residential amenity and the Ascension Parish Burial Ground - support therefore for	Policy NW2 sets out a number of overarching development principles that will guide development, with the aim that development takes account of its surroundings, including existing buildings, open spaces and existing urban and village edges to ensure that development does not harm local amenity and where possible brings benefits to the area. Matters of detail will be dealt with in the Masterplanning and planning application stages.

<p>the University's site footprint set out in Option 10.1.</p>	<p>No changes to the AAP.</p>
<p>Lower densities and building heights with more green open spaces needed on edges of the development where it abuts existing properties.</p>	<p>This is dealt with in the overarching development principles (NW2) that will guide development. It will be for the Masterplanning and planning application stages to take this forward in designing the development to achieve appropriate landscaping on the edge of development and to safeguard the amenity of existing properties. Masterplanning will also consider how best to protect the character of the existing features of interest including the Ascension Parish Burial Ground.</p> <p>No changes to the AAP.</p>
<p>The site footprint is insufficient to meet the needs set out in other policies within the AAP or the future needs of the University, and would result in a poor and inefficient development configuration; the developable area identified is inadequate for 2,500 homes and student housing, research & development buildings and neighbourhood facilities.</p>	<p>The Councils' have carried out a final 'health check' on the site boundary prior to submission, testing it against the plan's objectives. This has led to modest amendments being made to the site footprint boundary in South Cambridgeshire, which increases the site footprint whilst retaining a green foreground setting to Cambridge provided by the slope of land rising from the Washpit Brook. This allows for an increase in the developable area of 3.9 hectares, taking the total developable site area to approximately 73 hectares and the total housing capacity to 2,325 dwellings, which remains within the range sought by the University.</p> <p>Amend the site footprint of the Area Action Plan.</p>
<p>Support for the Strategic Gap but confusion over its purpose.</p>	<p>Amend the first sentence of paragraph 3.7 to provide clarification.</p>
<p>Housing</p>	
<p>Two storey houses should be provided adjacent to the site edges with 30 metre long gardens to provide wildlife sanctuaries and to respect local character and residential amenity.</p>	<p>Disagree that this should be the case as such an inflexible policy is not justified. Policy wording already states that development will be of an appropriate form and scale where it adjoins existing housing. The protection of amenity and character cannot only be achieved in the ways proposed and it is proper to allow future masterplanners and designers to have some flexibility in meeting this requirement.</p> <p>No change to the Area Action Plan.</p>
<p>Inclusion of words 'at least 50% affordable housing' is unsound and not supported by the evidence.</p>	<p>Agree that the Local Plan Inspector did agree that a 50% target for this site was appropriate having regard to the viability evidence. However the policy qualifies its reference to 50% affordable housing being provided by stating that account will be taken of costs and viability, it cannot therefore be termed inflexible.</p>

	<p>Amend the Area Action Plan by deleting the words ‘at least’. Amend supporting text (para. 4.6) to better reflect the Cambridge Local Plan Inspector’s Report.</p>
<p>Concerns regarding affordable housing distribution in small groups or clusters and the proposal to locate student housing in a separate and distinct quarter as set out in Policy NW7.</p>	<p>Intermingling of affordable and market housing is standard planning practice and is supported by PPS3.</p> <p>Amend the Area Action Plan to clarify what is meant by small groups or clusters.</p> <p>With regards to student housing, agree that as over half the student housing would be for post-graduates who can have cars, the case for a separate student quarter is less convincing.</p> <p>Amend the Area Action Plan to reflect this.</p>
<p>Employment</p>	
<p>The split between academic uses and research is arbitrary, greater flexibility should be allowed in order to take full advantage of opportunities when they arise.</p>	<p>In order to plan positively for the future of the area more detail is needed on the likely mix of uses. In the absence of more detailed evidence this split has had the advantage of going through the Inquiry Process for the Cambridge Local Plan and maintains predominantly University-related uses in the employment uses on the site.</p> <p>A change has been made to the split in light of a recalculation of figures.</p>
<p>Transport</p>	
<p>The link road will primarily be for access to the site but it will also offer an alternative access to the strategic road network.</p>	<p>The prime function of the road is to provide access to the development, with the proviso that this does not have adverse traffic impacts or effects upon amenity. The location and design of the route will take into account the factors raised in this objection (proximity to the strategic gap, SSSI etc).</p> <p>No change to the Area Action Plan.</p>
<p>A road will only be possible if impacts on amenities including the green/strategic gap and the historic environment are acceptable.</p>	<p>Agree that this is a key issue, paragraph 6.6 makes it clear that a road will only be possible if impacts on amenity are acceptable. These impacts would include minimising the effects upon green spaces and the historic environment through design, route location and landscaping as part of the Masterplanning process.</p> <p>No change to the Area Action Plan.</p>
<p>The design of new roads should give priority to public transport, pedestrians and cyclists.</p>	<p>The design of the new road, together with other policies in the AAP should give priority to public transport, cyclists and pedestrians.</p>

	No change to the Area Action Plan.
Madingley Rise could provide access to development to the east of the site and will help to distribute traffic evenly to the local road network (through the University Observatories site on Madingley Road).	The intention is to minimise the number of access points consistent with the form of development proposed, but this does not prevent access through the University Observatories if this is justified. Amend wording of paragraph 6.5 to clarify this.
Community Services and Facilities	
No reference to need for health care facilities.	Agree that there should be reference to healthcare provision in the AAP. Amend wording of paragraph 7.9.
1% contribution to public art should be a target, not a minimum requirement as this could have significant impact on viability.	Agree that this policy should be consistent with other planning policy guidance and seek a cost equal to 1% of the construction cost of the development. Amend Policy NW22 to reflect this.
Natural Resources	
Levels are far from a high degree of sustainability. Code level 5 should be the absolute minimum for residential.	This would not be consistent with national policy, which states that such policies should have regard to viability of the development and the delivery of affordable housing. Code Level 4 represents a 44% improvement in energy/carbon performance than part L of Building Regulations. Of the 2,250 dwellings proposed, 1,700 will be brought forward at a minimum of Code Level 5. No change to the Area Action Plan.
An approach that delivers Code level 4 up to 2016 and Code level 6 beyond 2016 would provide a more realistic delivery path.	The Councils' approach is consistent with National and Regional Planning Policy. If CHP is found to be viable at this site this will result in considerable carbon emission reduction and assist in meeting the specified Code levels. No change to the Area Action Plan.
There is a need for greater clarity and certainty in the proposed approach, particularly clarification of the relationship between Policy Options NW24 and NW29.	Amend the Area Action Plan to combine policies NW24, NW25 and NW29 in order to ensure clarity.
Policies should reflect recent development in strategic management of water resources and the Catchment	Level of detail required is too detailed for the Area Action Plan, which is intended to give a strategic overview to development. This level of detail will need to be included in the Flood Risk Assessment, which will be submitted

Wide Studies now being developed by the Environment Agency.	with the outline planning application and will be subject to consultation with the Environment Agency. No change to the Area Action Plan.
Recent survey work on the 350m culvert carrying the Award Drain beneath the B1049 in Histon and Impington has amplified grave concerns over flood risk and structural soundness.	Level of detail required is too detailed for the Area Action Plan, which is intended to give a strategic overview to development. This level of detail will need to be included in the Flood Risk Assessment, which will be submitted with the outline planning application and will be subject to consultation with the Environment Agency. No change to the Area Action Plan.
Delivery	
Construction waste must not be placed in mounds or beams near the boundary where it will diminish the amenity of neighbouring houses or in such a way as to create surface water or sub surface runoff from the site.	Amend part b of Policy NW30 to provide more clarity with regards to local urban character and landscape character.
The University has already demonstrated its needs case for residential housing provision and student housing.	In accordance with Structure Plan policy P9/2c, land should be released from the Green Belt for predominantly University related uses and only brought forward when the University show a clear need for land to be released. Housing is not the only element of the site and due to the site's close proximity to the West Cambridge site, it is important that as development comes forward, the University can satisfactorily demonstrate the need for the development and that it cannot reasonably be met elsewhere. A needs statement will be required. No change to the Area Action Plan.

SUMMARY OF THE MAIN ISSUES RAISED TO THE SUBMISSION DRAFT AAP

PREFACE

- The Councils did not adequately consult with individual residents adjoining and adjacent to the North West Cambridge site (or residents associations).
- Insufficient weight has been given to the North West Cambridge Area Action Plan Green Belt Landscape Study.
- Rapid changes in our understanding of climate change, problems of food production and problems of flooding makes these plans seem rash in the extreme.

CHAPTER 1: INTRODUCTION

- The Sustainability Appraisal has not discussed in any significant way the social impact of the proposed development on adjoining and adjacent properties around the site.
- The authors of the draft Sustainability Appraisal have not directly consulted with residents adjoining and adjacent to the North West Cambridge site (or residents associations).
- The Councils did not consult directly with individual residents adjoining and adjacent to the North West Site (or residents associations).

CHAPTER 2: VISION, OBJECTIVES AND DEVELOPMENT PRINCIPLES

- The Submission Draft AAP will greatly diminish the amenity of existing adjoining residents and produce an unsustainable site.
- The development must not harm local amenity and the only way to ensure that this is achieved is through timely and frequent consultation with local residents and residents groups.
- Not aware of the University having demonstrated any need beyond that for a certain amount of new affordable housing for its staff. The University's claims should be carefully and sceptically scrutinised.
- It is not possible to protect the historic landscape, biodiversity, limit light pollution and protect the Travellers Rest SSSI without deciding not to build at all. Do not allow planning permission on this site.
- The AAP should make provision for a minimum of 2,500 dwellings.
- The provision of 2,500 dwellings is excessive and conflicts with the policy framework for release of the site from the Green Belt and detracts from the emphasis on University-related provision.
- Would question whether there is a need for more hotel and conference facilities.
- Recent initial studies have indicated that land surrounding the SSSI has geological features of special note. These features must be protected, maintained in a favourable condition and suitably managed.
- Need to address wider setting matters such as long distance views.
- Noise from the M11 and A14 is a very substantial issue and no mitigation measures should be excluded at this stage before the announced studies have been examined.

Policy NW1: Vision

- Need to include health centre and religious worship facilities otherwise unacceptably high levels of car usage will be generated.
- In the present climate the vision should explicitly include a zero carbon, zero waste development.
- The thinking over the revised Green Belt is incoherent and self-contradictory.
- The policy should also address the need for the built environment to respect, and respond to, the character of Cambridge. Building heights and layouts will be particularly important.

Objectives of the Area Action Plan

- The importance of protecting the character and setting of the historic city should be included in the objectives.

Objective B

- Huntingdon Road (south side) and Storeys Way (north section) form a very successful and supportive 'village' whose atmosphere must not be damaged by the development.

Objective D

- I have never heard of, or participated in, a study made by the University to assess the need for affordable housing for University and College staff. There is a need to demonstrate need for 'key worker' housing in terms of volume and to define the term in relation to the various grades of university and college staff.

Objective F

- Revise objective to read "To secure high quality development of built form, open spaces and natural green space".

Objective G

- The word 'communities' implies the wider areas of this and other sites, and not specifically to existing adjoining residences (and land between Huntingdon Road and Histon Road).
- The objectives do not contain anything that safeguards the interests of the residents adjoining and adjacent to the site in terms of ensuring development that respects and promotes their amenity and is of a scale and character that is appropriate to this sensitive site. The words 'adjoining communities' are not sufficient.

Objective H

- A lack of facilities and high proportion of family units make the 40% modal split figure unrealistic.
- It is unsustainable to have as much as 40% of trips made by car both on and off the North West Cambridge site.
- Should be replaced by explicit mention of the Government's Manual for Streets and its hierarchy of users.
- Figure of 40% needs justification and an explanation of how the proposed policies would meet it.

Objective I

- No amount of euphemistic language can disguise the fact that the proposed development conflicts head-on with the purposes of the Green Belt.
- Remove the Green Belt designation for the area south of Nineteen Acre Field as it fulfils none of the purposes of the Green Belt.

Objective K

- The plan fails to achieve adequate separation between Girton and Cambridge. A clear statement is required as to the status of the north-west segment of the development and Girton.

Objective L

- Need to add detail of standards and include effects on communities elsewhere in Cambridge.

Objective N

- Consequences for other communities in Cambridge should be taken into account when considering phasing for example community provision on new sites.

Objective P

- It is impossible to see how this can be done. Protecting wildlife is incompatible with development of this size and what does securing a net increase in biodiversity mean?
- Needs to be revised to make specific reference to the SSSI and special geological interest.

Policy NW2: Development Principles

Principle 1

- It should be expressly stated in the plan that the site will be planned and developed in a way that protects the legitimate interests of residents adjoining or adjacent to the site by protecting their amenity and the character and setting of their residences.

Principle 1 a)

- The word 'communities' relates to a wide area and does not specifically include adjoining residences or the Ascension Burial Ground. Add a new development principle "To safeguard the character, setting and amenity of adjoining and adjacent residences, and of the Ascension Parish Burial Ground".

Principle 1 b)

- Need to specify what is meant by "high level of design quality".

Principle 1 e)

- Need to clarify precisely the standards to be met and the means for mitigating the noise impact of the M11 and A14.

Principles 2 f)

- Need to make specific reference to the SSSI and surrounding area and geodiversity of the area.

Principle 2 i)

- Various proposals for maximum permeability from the site for cycles and pedestrians disregard the impact that this excessive and unnecessary accessibility has in increasing the opportunities for crime via the back gardens or adjoining and adjacent houses along Huntingdon Road and All Souls Lane.

Principle 2 j)

- While this principle is supported it is difficult to see how it would be achieved. There is a rather low limit on the percentage that can be recycled with current manufacturing practices.

Principle 3

- With regards to 'unacceptable adverse impact', unless the test of this impact is objective it will be simple for the Council to brush aside criticism without proper consideration in an objective way.
- A development of this size will cause an increase in light pollution for the surrounding residential and wider community, particularly on the operations of the Institute of Astronomy Observatory. The Plan must protect the community from unacceptable impact in this respect.

Principle 3 k)

- The Councils proposals will lead to development of a site that is too small and too dense and which degrades the amenity of existing adjoining properties.

- The Councils should be required to consult with residents adjoining the site continuously during all phases of development of the site.
- Concerned that residential amenity will be so broadly interpreted that unacceptable impacts on adjoining properties will be considered to be outweighed by some generalised benefit for example new community facilities.
- Existing historic and visually attractive neighbourhoods should not be carved up to provide maximum permeability to the site. Properties should not be subject to Compulsory Purchase to enable this.

Principle 3 n)

- There is no reference to the protection of existing wildlife corridors and habitats.
- Remain concerned that the historic environment is not acknowledged in the AAP as a key issue.

Principle 3 o)

- The water table is very high in this part of Cambridge and building on a high water table may push underground water elsewhere.
- Need to consider the impact on surrounding communities.
- The water courses in this area are already above capacity and any increase in flood risk would be adverse.

Principle 3 p)

- This principle is supported but there is a need to consider the impact on existing communities.

Principle 3 q)

- The term “local” needs definition.
- Any increase in traffic is adverse. If the impact were proved to be adverse would planning permission be withdrawn or permission for subsequent stages be withheld?

Principle 3 r)

- The Ascension Burial Ground is in the Storeys Way Conservation Area and should be acknowledged in this principle.

Principle 3 s)

- Changes to the site could adversely affect mature trees through root disturbance for those on the boundaries and possibly less water supplies for them all.

Principle 4

- A development of this size will cause an increase in light pollution for the surrounding residential and wider community, particularly on the operations of the Institute of Astronomy Observatory.
- It is not just the exposure of the development to these forms of pollution that needs to be considered but of those living close to the proposed development.

Policy NW3: Implementing the Area Action Plan

- The Councils should be required to consult with residents adjoining the site continuously throughout all phases of development of the site and prior to the creation of drafts for general consultation.
- Add a further part to this section to refer to the wider historic character of the City.

Figure 2.1: Concept Diagram

- The AAP should make provision for a secondary vehicular access from Madingley Road via Madingley Rise to ensure that the Plan's policies and proposals are deliverable and that the AAP is sound.
- Land at Madingley Road does not perform the functions of the Cambridge Green Belt and should not be allocated as Green Belt in the AAP. It should be allocated as Open Countryside in recognition of the need to retain flexibility over the use of the land through the life of the AAP.
- A long stagger is the preferred vehicular access strategy to both sites along Huntingdon Road and as such B2 should be removed from the concept diagram.
- Object to the current boundaries of the indicative built environment in the vicinity of the SSSI due to impacts on the special features of the Traveller's Rest Pit.

CHAPTER 3: SITE AND SETTING

- Strong support for the strategic gap, however a minimum size for the gap should be stated to prevent a "token" gap.
- Would like to see the role that the Green Belt has in protecting the geological interests of the site highlighted.
- The Green Belt boundary facing the M11 does not need to be designated as Green Belt to protect the setting of the development as this can be achieved through other measures.
- A minimum size for the strategic gap should be stated.
- The green corridor proposed to be designated as Green Belt does not serve any purpose of the Cambridge Green Belt and would be harmful to creating a cohesive urban extension to Cambridge.
- The language leaves unclear the relationship between the north-west segment (in the Parish of Girton) and Girton village.

Policy NW4: Site and Setting

- The development site would not deliver the Plan's developments proposals.
- The development boundary is not based on a consistent evaluation process and does not consider masterplanning principles and is not based upon up-to-date information.
- Land designated as Green Belt does not serve a Green Belt function.
- Part of the Green Belt boundary is not defined by readily recognisable features in the landscape. Designation of the development footprint as the Green Belt boundary does not enable sufficient flexibility to bring forward a sustainable development through masterplan refinement.

- The north western half of the two part development area (North West of the proposed open space) being directly adjacent to Huntingdon Road will make Girton a suburb of Cambridge, rather than a distinct village. This is against the purpose of the Cambridge Green Belt.
- The location of the proposed development is within 3 miles of another major development at Northstowe and is located at the intersection of the M11 and A14. This will place an undue burden on the road infrastructure in this area.
- We support the University's request for a larger site. We believe that a 73 hectare site is too small to meet the University of Cambridge's proposed needs and will lead to a site that is too dense and is unsustainable. A larger site would allow the University to honour its commitment to adjoining residents of Huntingdon Road and All Souls Lane to keep the density along the borders of the site low.
- The proposed Northern half of the development is separated from the village of Girton by only the Huntingdon Rd extending Girton directly into Cambridge with no separation, which is against the purpose of the Cambridge Green Belt. By moving the development southwards towards the M11, an open space between the development and Girton could be maintained whilst occupying the same footprint. The current plan protects the view of Cambridge from the M11, at the expense of turning Girton into a suburb. With Northstowe being developed so close to Girton the plan will extend Cambridge as a sprawl Northwards.
- The site footprint should pay less attention to the fleeting view of the site fringe from the M11.
- Masterplanning of the site needs to be sensitive to the Green Belt characteristics of the area and have regard to the sensitive nature of the Green Belt location. Development should therefore be targeted to the eastern part of the site within Cambridge City in the first instance.
- Strategic gap appears to provide for reduced opportunities for accessibility, biodiversity and landscape and creates poor separation between Girton and Cambridge.
- Need a greater degree of separation between Cambridge and Girton.
- Land at Madingley Road does not perform the functions of the Cambridge Green Belt and should not be allocated as Green Belt in the AAP. It should be allocated as Open Countryside in recognition of the need to retain flexibility over the use of the land through the life of the AAP.

CHAPTER 4: HOUSING

- At masterplanning workshops held in 2005, the University agreed with local residents that houses bordering their properties would be two-storeys with peaked roofs and with 30 metre gardens to augment the wildlife sanctuaries in our gardens. The wildlife from these sanctuaries would permeate the site at a time when on-site landscaping would be immature.
- Existing properties and amenity must not be adversely affected.

Policy NW5: Housing Supply

- The need for a substantial amount of affordable housing for University staff has been demonstrated. Reference to 2,000 – 2,500 dwellings should be deleted as it has been demonstrated that the site can accommodate 2,500 dwellings and that development viability is more secure with this number of dwellings.

- The proposed net density should be reduced to the maximum of 30dph as required by the Structure Plan (2003).
- The simultaneous development of the NIAB site and an overly dense North West Cambridge site will place excessive strain on scarce water resources and other infrastructure needs in this area in the context of a difficult economic environment.
- Density and height restrictions should be placed on properties close to the boundaries of existing residential areas.
- At the University's masterplanning workshops in 2005, it was agreed that on the boundaries of our properties there would be two storey houses with peaked roofs and 30 metre gardens which would protect and augment the wildlife sanctuaries in these gardens and All Souls Burial Ground. A site that is dense in its boundaries, would destroy wildlife on its edges.
- The University's requirements cannot be met within the site as currently defined. In order to accommodate other uses on the site, the number of dwellings will therefore need to be reduced.
- It is important that the number of dwelling units is not fixed absolutely before the implications of the development are understood. The protection of the setting of Cambridge should be taken as a guiding principle.
- Provision of 2,500 dwellings is excessive. This conflicts with policy framework for release of land from the Green Belt and detracts from emphasis on University-related provision. Excessive density will worsen the danger of coalescence.
- PPS3 sets out a requirement for a more responsive approach to housing land supply, which is lost in the test of the AAP.
- Do not accept that the housing is deliverable in the expected timescales (particularly the 200 dwellings in 2011/2012).
- The University is yet to demonstrate a need for the release of land to meet its needs. The AAP should include a trigger requiring that need be demonstrated prior to releasing land for development (this should also preclude the grant of outline permissions).

Policy NW6: Affordable Housing

- Remove any mention of including open market housing for this site and make it 100% affordable housing for sole use of the University.
- As currently worded, the policy suggests that in view of competing demands for funding, provision below 50% may be considered. In view of the scale of identified need, this should be framed so as to set the realisation of a higher proportion as a clear objective.
- There are some concerns over the inclusive nature of the policy.

Policy NW7: Balanced and Sustainable Communities

- Houses bordering the existing residential areas should be two-storeys with peaked roofs and with 30 metre gardens. These should be market housing or affordable housing for key University staff. Student housing should be situated away from the boundaries.
- Object to the proposals to distribute affordable housing in small groups or clusters as normal objectives for mixing affordable housing and market housing are not relevant here.

- It is not possible to ensure that student housing will be provided in each individual phase of the development in small clusters as this approach would not provide suitable development sites for such accommodation and would have implications for delivery.
- Wording in relation to Lifetime Homes does not give a sufficiently firm impression about the level of provision.
- Housing mix needs to be sensitive to the nature of existing communities.

CHAPTER 6: TRAVEL

- The need to travel outside of the development cannot be achieved for many reasons. A high proportion of the University personnel living there will have a constant need to visit College, other departments etc.
- Madingley Road Park and Ride needs to become a major coach transfer station for Cambridge coach routes west and north.
- Strongly object to the possible adoption of signalised crossroads on Huntingdon Road. This would require the compulsory purchase of properties on the south side of Huntingdon Road and would fragment existing historic communities. New road construction should protect the amenity of existing adjoining properties at all times.
- Impacts on local residents must be reasonable.
- Cycle and pedestrian access to the site from Huntingdon Road should be limited to the three existing access points. Inbound cycle traffic should be directed towards Madingley Road. Walkers to inbound buses should be directed away from Madingley Road and the NIAB site and towards buses at the local centre and on Madingley Road. Cycle traffic and pedestrians should not be channelled into the Ascension Burial Ground or All Souls Lane. Existing adjoining and adjacent houses should not be purchased and demolished to provide cycle access, pedestrian access or construction access.
- Cycle routes should also be 'high quality' planned in accordance with the Manual for Streets.
- Concern over overspill car parking in adjoining communities.
- Secondary access through the Observatories would bisect the Bullard Laboratories and BP Institute, with severe environmental and safety consequences due to position of having roads crossing the strategic gap only once. This restriction should be re-examined.
- The AAP should refer to access through Madingley Rise and not through the University Observatories.
- High quality public transport needs to be defined.
- Concern of re-routing of bus services away from existing routes and into the North West site.
- The grid system of paths should be designed such that it can be used by both cyclists and walkers as a "shared space". No "cycling chicanes" should be used anywhere on the site. Where pedestrian and cycle routes are separated, both should always be running in parallel such that there is no preference of pedestrians over cyclists or vice versa.

Policy NW11: Sustainable Travel

- The 40% modal split is unachievable and impossible to monitor and enforce.

- Concern that this could have a detrimental effect in existing and future residents in terms of public transport and overspill car parking.
- This should include explicit mention to the Governments 'Manual for Streets' and its hierarchy of users.

Policy NW12: Highway Infrastructure

- There is currently insufficient highway capacity at peak times thus any increase in motor traffic will make a bad situation even worse. The 'significant' diverse traffic impacts must be objectively considered.
- The improvement of the M11 junction at Madingley Road is essential and should be explicitly included in this policy.

Policy NW13: Vehicular Access

- Huntingdon Road is already inadequate for current demand. No indication is given of how traffic will interface with that of other developments.
- No argument is put forward for the restriction of access from Storey's Way being only for private motor vehicles.

Policy NW14: Madingley Road to Huntingdon Road Link

- Concerned that the route will lead to an outer orbital route for Cambridge, which will foster only orbital movements served primarily by car rather than radial movements by public transport.
- Seems to be a lack of joined-up thinking about access routes through this site (and NIAB) and how they will be connected.

Policy NW16: Public Transport Provision

- There is not to be missed an opportunity to improve bus services throughout a large sector by developing a segregated busway west of Cambridge.
- No reference is made to the effect of the TIF bid on public transport and how these plans will integrate with it.
- There are no clear mechanisms for enhancing bus services through the development other than through infrastructure provision, which is already dealt with in the policy. The AAP is not sound if the development is required to deliver operational, service or other enhancements to bus services.

Policy NW17: Cycling Provision

- The road and cycle track at the south end of Huntingdon Road all the way down to Senate House is dangerously congested at term time as it is. It may well be impossible to cater safely for additional cyclists unless vehicular traffic is curtailed in the congested areas.

- Cycle access should be limited to three points and inbound traffic directed away from Huntingdon Road and the NIAB site towards Madingley Road. No properties should be demolished in order to encroach on the graveyard or All Souls Lane.
- Plan gives no indication of how conflict with buses can be avoided and how proper south-bound cycle facilities can have priority.

Policy NW18: Walking Provision

- Some of the information about walking distances in the Transport Study appears to be seriously misleading.
- Need to define what is meant by adjacent communities.
- Walking access to the site from Huntingdon Road should be limited to three existing routes on Huntingdon Road and pedestrians intending to catch buses into the City centre should be directed away from Huntingdon Road and the NIAB site and towards buses at the local centre and on Madingley Road. Walkers should not be channelled into the Ascension Burial Ground or All Souls Lane. Adjoining and adjacent houses should not be purchased and/or demolished in whole or in part to provide walking access to the site.

Policy NW19: Parking Standards

- No indication is given as to how visitor access is to be controlled to ensure that the number of visitor cars does not exceed the parking provision.
- Additional measures are needed to ensure that inadequate parking provision does not drive motorists to use footways, roads and possible land for parking.
- Reliance on proctorial control of student motor vehicles is inappropriate as well as ineffective.

CHAPTER 7: COMMUNITY SERVICES & FACILITIES

- The County Council's preferred site for locating a Local Recycling Centre to serve the northern sector of Cambridge is within the Cambridge Northern Fringe east. If this option is found to be untenable, then an alternative option will have to be pursued, and this is likely to be the North West site. The AAP should make reference to the possible need for this Recycling Centre.
- The site will require primary provision for a least 3 forms of entry (FE) to cater for the highest levels of development. To deliver this provision the County Council would be seeking a second primary school at North West Cambridge, initially on a site for 1FE, but with the capacity to expand if demand for further places emerged.
- Cambourne is a perfect example of how very wrong a development can go and what a lasting and adverse impact is created for the entire community when community services and facilities are not in place at the outset.
- Health services and facilities for religious worship must be included in the range of services provided.

- Services and facilities should be available before occupation of either the proposed NIAB site or the proposed University site to prevent overload of limited services and facilities in the area between Huntingdon Road and Histon Road.

NW21: A Local Centre

- There is a need to state explicitly that these facilities, which will be shared with those living to the north of Huntingdon Road, should be within reasonable walking distances of those communities.

CHAPTER 8: RECREATION

- Sport and recreational facilities for disabled residents must be provided and the entire open space planned to ensure no nuisance to or abuse of existing local residents.

NW23: Open Space and Recreation Provision

- The ability to meet the standards for open space and recreation are questioned given the size of the green corridor. Whilst it may be able to accommodate recreational facilities, biodiversity and landscape may be compromised.
- Policy also needs to refer to the provision of sufficient natural green space in accordance with Accessible Natural Greenspace Standards (ANGST).

CHAPTER 9: NATURAL RESOURCES

- Wind turbines should be deleted as an option. There is no clear space for such structures and they have been proven to be cost ineffective. The adverse impact on the new as well as existing local residents is totally unacceptable.
- Wish to ensure that following any appraisal of sewerage provision, no foul water drainage from the North West Cambridge site will be directed towards Uttons Drove, which is presently working at capacity.
- A renewably fuelled CHP is, ultimately, likely to be the most sustainable solution when there is significant year-round thermal demand of suitable large scale as development across the site is at or nearing completion. Until then, renewably fuelled district heating or gas CHP are more feasible options.
- Government policy in the PPS1 addendum consistently refers to 'renewable or low carbon energy sources'. In some cases heat from fossil fuel CHP can deliver more carbon savings than heat pumps or even biomass boilers and a lower cost and therefore should be included in this section (Air Source Heat Pumps and Fossil Fuel Fired CHP).
- While we entirely support the goal of reducing water consumption we are concerned at the possibility of these figures being used to drive an inadequate waste and drainage strategy.

Policy NW24: Climate Change and Sustainable Design and Construction

- A very close watch will be needed to prevent unacceptably high levels of water in the locality.
- Goals need clarifying and implementation mechanisms identifying.

- There will be insufficient year-round thermal demand to support CHP until a substantial amount of academic research space is built. There is no evidence that the Code for Sustainable Homes Level 5 will be deliverable by April 2013.
- The Councils have not justified the specified Code Levels in terms of an appropriate evidence base. Such an approach is inconsistent with national planning policy.
- The plan should specify that the decentralised energy is indeed from renewable sources, and provides all the needs of a minimal proportion of the development (around 75% is too vague).
- These levels are far from a high degree of sustainability. Code Level 5 should be the absolute minimum and there should be demand for zero carbon buildings from the outset.
- Policy needs to make reference to adverse impacts on Geodiversity.

Policy NW25: Surface Water Drainage

- Considerable surface water drainage already exists from the site into gardens and basements in properties along Huntingdon Road and construction on site will greatly increase run off and sub-surface seepage from the site towards Huntingdon Road.
- A very close watch will be needed to prevent unacceptably high levels of water in the locality.
- Currently the Strategic Flood Risk Assessment carried out for the Council is using a non-verified model of the river (i.e. not verified by the Environment Agency).
- The policy states that the surface water drainage should be designed “as far as possible as a [SuDS] to reduce overall run-off”. This might be insufficient to protect existing adjacent properties including those on Huntingdon Road. The wording needs to be tightened to ensure there is no increase in run-off leaving the site in the direction of those properties.
- SuDS is little more than a idea and certainly not a proven technology.
- The policy is insufficiently robust and does not make it clear that flood risk may be increased at some distance from the site due to development.

Policy NW26: Foul Drainage and Sewage Disposal

- The need to consider the effects on Cambridge City and Cambridgeshire must be strengthened.
- This is an additional 7,900 dwellings over the previous indications. The current strategy under consideration by Anglian Water Services only allows for 2,500 dwellings in this area and cannot accommodate any further numbers (in terms of the effect on the wastewater sewerage system).

Policy NW27: Management and Maintenance of Surface Water Drainage Systems

- The Council is concerned that the major problems begin when the water leaves the site and obligations should be built in concerning the history of the water at least as far as the Cottenham Lode, preferably all the way to the Ouse.

CHAPTER 10: DELIVERY

- Construction spoil should not be placed along the boundary of the site where it would create mounds that would diminish the amenity of existing adjoining and adjacent properties.

- Construction spoil should not be placed on the site in a position that leads to surface run-off or sub-surface seepage from the site into the gardens and houses of existing and adjoining and adjacent properties on Huntingdon Road and in All Souls Lane and into the Ascension Parish Burial Ground.
- It should be built into the requirements that Parish Councils will be involved at all stages of the delivery planning process and in all Section 106 discussions.
- Provision for archaeological assessment, investigation and recording, in accordance with PPG16, should be included in the items requiring development funding.
- Infrastructure provision should, where relevant, include contributions for long-term maintenance of sites.
- Concern is expressed that delivery rates in the housing trajectory have been “stepped up” when on other sites within the housing trajectory for South Cambridgeshire District Council as a whole, delivery is being delayed.

Policy NW28: Construction Process

- Construction spoil must not either during the course of the development or permanently be stacked or left on or near the boundaries of the site where they adjoin or are close to existing dwellings.
- The phrase “where practicable” when read with paragraph (d) has insufficient rigour to protect parts of the City from disruption.
- Account has not been taken of the impact of the development on adjoining and adjacent residences.

Policy NW29: Strategic Landscaping

- The policy should be reworded to make specific reference to impacts on geodiversity.

Policy NW30: Phasing and Need

- Construction of the North West Cambridge site should be scaled and phased with respect to construction at the NIAB site and construction access to the site should be primarily through the University’s property on Madingley Road.
- Policy should not require demonstration that there is a need for the University or collegiate housing. This need was established through the Local Plan Inquiry.
- To provide more certainty with regards to delivery, a Needs Assessment should be submitted and at the earliest possible opportunity.
- More stringent criteria for assessment of University need have to be developed, including reference to the need to consider alternative site opportunities and to place the onus more directly on the University to justify the release of the site.
- The site should be phased to start from the existing urban edge, i.e. from the eastern part of the site. Providing for the start of development on the western part of the site would leave the development divorced from the urban area and would represent an incongruous starting point for the development.

- The housing trajectory should be adjusted to reflect a more realistic expectation of delivery, founded upon a more robust evidence base.

Housing Trajectory

- Concern is raised in relation to the figures provided within the housing trajectory for the following reasons:
 - There is clear recognition that there are many factors which are beyond the control of LPAs and the development industry and therefore rates of delivery are uncertain;
 - The site is not capable of accommodating the number of houses identified;
 - The AAP recognises that the University has to prove its need for the land to be released for development. Should the University be unable to prove this need, all or part of the proposed development would not proceed.

In view of the above we are concerned about the over-reliance on this site in terms of meeting housing requirements.

- The housing trajectory should be consistent with figures contained in the South Cambs AMR (2007), which provides for a total of 400 units to be completed by 2016 as opposed to the revised position within the AAP of some 550 units. Concern is expressed that the delivery rates have been “stepped up” when on other sites within the housing trajectory for South Cambridgeshire District Council as a whole, delivery is being delayed.
- The housing trajectory should make provision for a minimum of 2,500 dwellings as this makes deliverability more secure.
- In order to comply with the national Strategic Housing Land Availability Assessment Practice Guidance, a comprehensive SHLAA should be produced jointly with key stakeholders in order that all assumptions are as realistic and accurate as possible.

Table 11.1 – Core and Local Output Indicators

- Biodiversity and geodiversity should be included here.

Proposals Map

- Land at Madingley Road does not perform the functions of the Cambridge Green Belt and should not therefore be allocated as Green Belt in the AAP. The land should be allocated as Open Countryside.
- The development site would not deliver the Plan’s development proposals.
- The development boundary is not based on a consistent evaluation process and does not consider masterplanning principles and is not based on up-to-date information.
- Land designated as Green Belt does not serve a Green Belt function.
- Part of the Green belt boundary is not defined by readily recognisable features in the landscape. Designation of the development footprint as the Green Belt boundary does not enable sufficient flexibility to bring forward a sustainable development through masterplan refinement.

- The strategic gap appears to provide for reduced opportunities for accessibility, biodiversity and landscape and creates poor separation between Girton and Cambridge.
- Whilst the limited size of the green corridor may be sufficient to accommodate recreational facilities, biodiversity and landscape may be compromised. Amend the proposals map to increase the strategic gap.
- The Green Belt Landscape Study recognised the heritage and landscape values of land below Girton Ridge and as such the development parcels should exclude land to the south of Girton Ridge.
- Boundary of the SSSI is incorrect and should be amended.
- The location of a major development site so close to the existing SSSI would be directly damaging to the special geological interest of this site. In addition, specialist survey work has indicated that surrounding land, in all likelihood has features of additional special geological importance, which would be sterilised by the location of major development in the vicinity of the SSSI. Would prefer to see the area of special geological interest incorporated within the area of natural green space (prior to a process of SSSI re-notification).

Appendix 3: Open Space and Recreation Standards

- Natural England's Accessible Natural Greenspace Standards (ANGST) should be referenced throughout this appendix.