

## Chapter 1: Introduction

<p><b>Paragraphs 1.1 – 1.2</b>  <b>Introductory paragraphs: The background to the plan, the evidence base and the consultation undertaken to prepare it</b></p>	
<p><b>Proposed Submission Representations Received</b></p>	<p>Total: 15  Support: 5  Object: 10</p>
<p><b>Main Issues</b></p>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Guilden Morden and Haslingfield Parish Councils</b> support for the plan.</li> <li>• Comments from previous consultations have been taken into account.</li> <li>• <b>Suffolk County Council</b> supports the plan and seeks on-going co-operation to ensure that the A14 and A1307 remain safe and support growth throughout the region.</li> <li>• <b>Linton Parish Council comments that</b> the SHLAA procedure was thorough and well argued.</li> </ul> <p><b>Object</b></p> <p><b>Consultation</b></p> <ul style="list-style-type: none"> <li>• After Issues &amp; Options 1 the Council announced that Bourn Airfield would not be pursued as a development site but would be consulted on purely for a stadium. Bourn Airfield was reintroduced into the Local Plan at the Proposed Submission stage without further consultation. This is undemocratic, unsound and possibly illegal.</li> <li>• Changes made to documentation during consultation - led to confusion and brings into question whole process. Hastily prepared to meet government housing targets over-riding local views.</li> <li>• Is there any evidence of changes made as a result of the first consultation?</li> <li>• The consultation has little meaning as much of the plans is already a reality.</li> <li>• Complete fullness and transparency should be maintained throughout this consultation period and during the period of presentation of the plan to the Inspector.</li> <li>• Lack of liaison with transport planners, proposals to toll the A14 will increase traffic using the A428.</li> <li>• The following definition must be made clear to the public in</li> </ul>

	<p>the new consultation period and before the plan is submitted to the Inspector:</p> <ul style="list-style-type: none"> <li>○ The availability of previous minutes.</li> <li>○ Newly emerging aspects of appendages to plan.</li> <li>○ The 5 year land supply plan.</li> <li>○ The meetings preceding this plan.</li> </ul> <p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>● SHLAA and economic estimates are flawed.</li> </ul> <p><b>Sites &amp; Strategy</b></p> <ul style="list-style-type: none"> <li>● Object to scale of development and lack of capacity of services and infrastructure.</li> <li>● Method of selecting sites simply relies on developers putting forward ones they have options on and not providing homes where needed.</li> <li>● Council failed to properly investigate suitability of other sites, in particular to South of Cambridge that would have been more sustainable and nearer the need.</li> <li>● Council needs to address waste issues, and protect the countryside.</li> </ul> <p><b>Decisions</b></p> <ul style="list-style-type: none"> <li>● Council did not put final plan to committee, only portfolio holders decided, other councillors were issued with fait accompli that did not accord with views expressed in workshops that were not even open to public scrutiny.</li> </ul> <p><b>Format</b></p> <ul style="list-style-type: none"> <li>● <b>The Wildlife Trust</b> comments that the policies map contains too much information – separate into a number of themed proposals maps.</li> </ul>
<b>Assessment</b>	<p><b>Consultation</b></p> <p>No decisions or announcements were made on the Council’s consideration of either Issues &amp; Options Consultations until after the Portfolio Holder considered a report on both consultations on 11<sup>th</sup> June 2013.</p> <p>The Council carried out two rounds of Issues &amp; Options consultation, in Summer 2012 and Winter 2012/13. The first round of consultation included development site options and elicited a number of new sites some of which were included as additional site options in the second Issues &amp; Options consultation. For the avoidance of doubt, this consultation and new sites were variously described as:</p>

*“(The consultation) looks at new issues and **additional site options** for development in South Cambridgeshire”* on the Exhibition Boards.

*“New options for supporting up to 30,000 new jobs being created in the district were suggested during a public consultation in the summer, and this consultation seeks residents’ views on **extra options for housing sites** and where a possible community stadium could be located.”* In the press release.

*“This (consultation) builds on the summer consultation by seeking views on **further site options for development and areas to be protected.**”* In the letter sent to everyone (including Parish Councils) who made representations during Issues & Options 1 consultation.

In the 13 December 2012 Committee report agreeing the Issues & Options 2 consultation, under the heading *“Part 2 – Further Site Options in South Cambridgeshire arising from the first Issues and Options consultation”* as **“Further site options in addition to those already consulted on are included in Part 2 for a range of issues.”**

The Council therefore made it very clear in a variety of ways that the Issues and Options 2 consultation did not in any way indicate a decision by the Council on any of the site options consulted on the first Issues and Options consultation. The additional sites were adding to the options already consulted on. There were only ten additional housing sites consulted on during Issues and Options 1, which were all relatively modest village scale sites and not comparable with the 52 site options in the first consultation, or capable of replacing them.

Not all options in either Issues & Options consultation have been included in the plan. For example, site options in Bassingbourn, Comberton, Cottenham, Fulbourn, Gamlingay, Girton, Histon, Linton, Melbourn, Sawston, Swavesey, Waterbeach and Willingham were not taken forward into the Local Plan.

The ‘changes made to documentation during consultation’ referred to in representations relates to the Strategic Housing Land Availability Assessment (SHLAA), including in particular the evidence base for Bourn Airfield. It concerned transferring into the

SHLAA, evidence base document information relied upon by the Council when it made the decision to propose a new village at Bourn Airfield. The version of the SHLAA issued at the start of the consultation did not include all of the most up-to-date information. All the latest information – such as how many homes could be built on the proposed sites – was used when compiling the Plan, but some of the data did not get transferred into the version of the SHLAA published at the beginning of the consultation.

This oversight was identified early in the consultation, and the evidence document was updated to ensure all such information was included in the SHLAA and it was re-published. To ensure that no one would be disadvantaged, the end of the consultation period was extended by 2 weeks from 30 September until 14 October 2013 to compensate and ensure a full six-week consultation period from the date of re-publication, as required by regulations. Those parties who had been notified about the public consultation were sent letters/e-mails advising what had happened and that the consultation period was being extended. A public notice was put in the press and the exhibition material was amended. The changes had no bearing on the Local Plan document or its proposals, which were unchanged.

The Council has been very clear from the outset that the Local Plan review is an update of the current Local Development Framework (LDF), incorporating its unimplemented proposals and adding new ones to extend the period covered by the Local Plan from 2016 to 2031. The current LDF was found sound by planning inspectors as recently as 2010 and still has, for example, proposals for about 14,000 houses in allocations most of which now have planning permission (e.g. Trumpington Meadows, the North West Cambridge (University) site, NIAB2 (also known as Darwin Green) and Northstowe).

The Council's plan-making processes are open and transparent. All decisions are made in public by the Portfolio Holder, Cabinet or Council where members have comprehensive reports on all matters bearing on the plan (including this report). All reports, agendas, minutes and supporting documents are publicly available.

There has been close working with the County Council as highways authority throughout the plan-making process. A joint member group (the Cambridge and South Cambridgeshire Joint Transport & Spatial Planning Group) has met regularly to ensure

that plans are joined up. On behalf of the two District Councils, the County Council has also commissioned transport modelling of the plans proposals. At the same time the County Council has been preparing and consulting on an overarching transport strategy for Cambridge and South Cambridgeshire.

Proposals for tolling the upgraded A14 were explored by the Highways Agency for national policy reasons. Following public consultation, the Government has decided not to proceed with tolling.

### **Evidence**

The National Planning Policy Framework (NPPF) requires each District Council to plan to objectively identify and then meet the housing, business and other development needs of the area. The housing and employment forecasts for the Local Plan have been produced in accordance with national guidance.

### **Sites & Strategy**

The National Planning Policy Framework (NPPF) requires each District Council to plan to objectively identify and then meet the housing, business and other development needs of the area. Availability of capacity in services and infrastructure can be a material planning consideration and has helped frame the proposals in the Local Plan. Where the Local Plan includes proposals for which new services and infrastructure are required, planning permission will require provision which will be funded by a mix of developer funding, funding from service and infrastructure providers and national funding streams, e.g. City Deal and the Local Growth Fund.

One of the four tests of the 'soundness' required of a Local Plan is that it is **effective**. Effective is defined in the NPPF as deliverable over the plan period. The NPPF provides advice that sites should be available, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site. If sites are not deliverable then the Council runs the risk that during the period covered by the new plan that it will not have a 5 year supply of deliverable housing sites. To ensure that the Local Plan would include sites which landowners would release for development and which developers considered suitable, the Council issued a 'Call for Sites' in the summer of 2011. This and additional sites which came forward during the two rounds of Issues & Options consultation elicited 338 sites spread across the whole District (including possible sites for new towns in

the north and south of the District), capable of delivering 92,500 dwellings. Through the Local Plan the Council was looking for sites for 5,000 dwellings in addition to the 14,000 homes already with permission or in the adopted Local Development Framework.

Protecting the countryside is an important national and local policy aim. The Local Plan seeks to protect the countryside from encroachment. This is achieved, for example, by making the best use of previously developed (brownfield) sites and by focussing development into the larger villages in the District. This means the tranquillity of the countryside will be less disturbed than by scattering development in the countryside and smaller villages, where most day to day needs of residents would require travel mostly by car to larger villages and towns.

Waste planning is the responsibility of the County Council who have been consulted throughout the preparation of the Local Plan.

### **Decisions**

Decisions on the Local Plan have been taken in accordance with the Council's constitution. Wider member participation was important and was achieved through holding a number of workshops to which all members of the Council were invited, notes of which are published on the Council's website pages relating to the Issues and Options consultation.

### **Format**

The Local Plan regulations require that all policies and proposals are contained on a single Policies Map with Inset Maps where greater detail is needed. This is the format that the Council has relied upon. We will however look again at the choice of symbols, tones and other annotations to see if greater clarity can be secured when the Local Plan is adopted.

### **Conclusion**

The preparation of the Local Plan complies with the spirit of public involvement and the Council's aim to be a listening Council. It also complies with the legal and procedural requirements of plan-making and the Council's Statement of Community Involvement. The Proposed Submission Local Plan has a sound evidence base, there has been cooperation in particular with Cambridge City Council and Cambridgeshire County Council and there have been three rounds of public consultation on issues and options and the proposed plan. The Local Plan is procedurally ready for submission to the Secretary of State.

<b>Approach in Submission Local Plan</b>	<b>No change</b>
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<b>What the plan does and how it is prepared: (Paragraphs 1.9 – 1.12)</b>	
<b>Proposed Submission Representations Received</b>	Total: 2 Support: 2 Object: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>The Wildlife Trust</b> supports commitment to protect and enhance the natural environment.</li> <li>• <b>Oakington &amp; Westwick Parish Council</b> supports the Local Plan taking forward Parish Council proposals which do not conflict with the strategy.</li> </ul>
<b>Assessment</b>	Support noted for the approach in the Proposed Submission Local Plan.
<b>Approach in Submission Local Plan</b>	<b>No change</b>

<b>What happens next (Paragraph 1.15)</b>	
<b>Proposed Submission Representations Received</b>	Total: 16 Support: 0 Object: 16
<b>Main Issues</b>	<b>Object</b> <p><b>Consultation Process</b></p> <ul style="list-style-type: none"> <li>• The Council isn't listening.</li> <li>• Advance notice of proposals should have been posted to objector's address.</li> <li>• Exhibitions not held at times convenient for all, e.g. rail commuters.</li> <li>• Poor availability of evidence documents.</li> </ul> <p><b>Making representations</b></p> <ul style="list-style-type: none"> <li>• Problems with the online consultation system.</li> <li>• Difficulties logging into the online system – paper representation sent instead.</li> </ul>

	<ul style="list-style-type: none"> <li>• Form is the same structure you used for previous consultations and was complained about at the time.</li> <li>• Form is excessively long and complicated to convey simple messages.</li> <li>• Questions are biased to receive the response you wish for self-justification.</li> <li>• Form is clearly designed to discourage members of the public from submitting views different from your own.</li> <li>• Consultation fails to conform to the "plain English" policy adopted by all local government organisations.</li> <li>• Any comment from a member of the public has to be legally justified for their representation to be registered.</li> <li>• Not qualified to comment whether the Local Plan has been lawfully prepared.</li> <li>• Structure of your consultation prevents the free expression of views in that it expects comments paragraph by paragraph rather than by overall topic.</li> <li>• No opportunity to respond to the plan as a whole in a single place.</li> <li>• Authors of all representations will be made public, which is unreasonable in itself, and a threatening message in red is displayed each time a comment is made.</li> </ul>
<p><b>Assessment</b></p>	<p><b>Consultation Process</b></p> <p>Being a listening Council is one of the Council's three aims. Listening to its residents and stakeholder does not mean that the Council will be able to agree with everyone. During the preparation of the new Local Plan, the Council has listened to views from across the whole of South Cambridgeshire which for example sent a very clear message that development should not be spread across all villages but should be focussed into larger villages, new villages or new towns. Many village site options included in the two rounds of Issues &amp; Options consultation have not been included in the new Local Plan but this has meant that objections have inevitably been focussed onto the small number of large site proposals (e.g. Waterbeach, Bourn Airfield and west of Cambourne).</p> <p>Anyone making representations at any stage of the Local Plan is subsequently notified by letter or e-mail of future plan-making stages – new rounds of public consultation or key decisions such as adoption.</p> <p>Exhibitions were held between 2.30pm and 7.30pm during the proposed submission consultation. This timing was carefully chosen based on many years of holding Local Plan exhibitions in</p>

South Cambridgeshire and experience of the time which is convenient to the vast majority of residents. In addition to a permanent exhibition at South Cambridgeshire Hall, the Council's website also hosted a virtual exhibition for anyone who could not attend an exhibition or who preferred the web for find out more information. Officers were also available during extended working hours for telephone callers.

Evidence documents have been available on the Council's website from the date that they were published. Evidence documents were also available at each exhibition.

### **Making Representations**

The Council used a representation form based on the Model Representation Form produced jointly by the Planning Advisory Service (PAS) and the Planning Inspectorate (PINS). This form was subsequently revised with every endeavour made to request the information requested in the PAS/PINS form in a simplified format. In response to concerns raised by some parish councils and residents, the Council further refined the representation form in consultation with some local representatives and agreed the final version with them with the aim of making a necessarily formal process as accessible as possible.

When the Inspector comes to examine the Local Plan, the assessment will follow the approach set out in the National Planning Policy Framework (NPPF) which includes whether the plan has been prepared in accordance legal and procedural requirements. The form included the opportunity for anyone making representations to say that they considered that the Council had not complied with the legal requirements but all aspects of making a representation were optional so those who did not feel able to comment did not have to. On 771 representations, this box was ticked to say the Local Plan was legally compliant. On 2,368 representations this box was ticked to say the Local Plan was considered not to be legally compliant. Any elaboration would have been included in the main body of their representations.

The Inspector will have to decide whether the Local Plan as submitted is sound. If he/she decides that any part of it is not sound then he/she will recommend the deletion or amendment of specific paragraphs, policies and proposals. To be most effective, representations therefore needed to be specific about what changes an objector was seeking. The online and paper forms provided scope for elaboration which could include free expression

	<p>of views or a response to the plan as a whole if that is what was wanted. Phone numbers for the Planning Policy team were included on all material for anyone wanting assistance.</p> <p>The Council is required by law to be open and transparent in the decisions that it makes. This includes making known the identity of those seeking to influence its decisions. As this information would be published, the Council deemed it necessary as a courtesy to advise anyone intending to make a representation that these details would be made public.</p> <p><b>Conclusion</b> Around 37,000 representations were made during the 3 rounds of public consultation for the new Local Plan. The consultation process seems to have been quite successful. The Local Plan is procedurally ready for submission to the Secretary of State.</p>
<b>Approach in Submission Local Plan</b>	<b>No change</b>

<b>Paragraph 1.17 What comprises the Development Plan for South Cambridgeshire</b>	
<b>Proposed Submission Representations Received</b>	Total: 1 Support: 0 Object: 1
<b>Main Issues</b>	<b>Object</b> <ul style="list-style-type: none"> <li>• <b>Cambridgeshire County Council</b> seeks correction to references the date of adoption of its Minerals and Waste plans.</li> </ul>
<b>Assessment</b>	This will be corrected.
<b>Approach in Submission Local Plan</b>	<b>Minor change</b>  Amend the sixth bullet point of paragraph 1.17 to read: 'Cambridgeshire Minerals and Waste Local Development Framework 2014 – <b><u>Core Strategy and Proposals Map C 2011 and Site Specific Proposals Plan and Proposals Map A and B 2012.</u></b> '