



South Cambridgeshire Local Plan Submission Sustainability Appraisal

Appendix 2: Representations on SA

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2	Final for Consultation with Local Plan Submission Draft	June 2013	VTT	SCDC
3	Final for Submission	March 2014	LV	SCDC

1 Introduction

This appendix sets out a summary of the representations received from the public consultations at all stages of the preparation of the Local Plan so far. The comments received during the various consultations have been summarised by South Cambridgeshire District Council in the following tables and the Council has provided its response. The consultations are presented in chronological order, with Table 1.1 documenting comments on the first stage of SA (scoping), and Table 1.7 setting out the latest consultation responses.

The tables are set out on the following pages as follows:

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Table 1.1 Representations on Draft Scoping Report (Which Accompanied the Issues and Options Report 2012)		
Representation Numbers	Summary of Representation	Council's Response
36455, 32728. 32725, 33448	Not likely to be contaminated, and potentially contaminated should be scored as negative impact.	The mechanism for scoring sites is clear, and establishes a positive impact reflecting potential for remediation of contamination. If a site was not considered capable of mitigation it would score negatively.
40810, 40742, 40820, 40723	We consider the Appraisal to be transparent. However we consider some of the Decision Making Criteria do not allow full consideration of the issues. For example, the Climate Change Sustainability Objective Decision Making Criterion does not take the energy saved through not burning fossil fuels by providing development in a sustainable location close to	Rather than including it within other themes, sustainable transport was drawn out into a separate theme to assess impacts in more detail. Testing has considered access to services and facilities, access to employment, access to public transport, and cycling opportunities. It also considers the location of the site relative to the development sequence, scoring Cambridge or the edge of

	<p>services and employment into consideration. Nor does the Decision Making Criterion for air pollution allow for the effect of minimising potential car journeys.</p> <p>The approach is flawed in so much that the most sustainable development options are not being differentiated from less sustainable options.</p>	Cambridge at the highest level, due to the location being nearest to the highest order services and facilities.
50429 Natural England	<p>Habitats Regulations Assessment</p> <p>We are satisfied with the conclusion of the initial assessment which suggests no significant effects are likely as a result of the issues and options identified, alone or in combination with other plans. We welcome acknowledgement that the Council will need to continue to work with stakeholders, Anglian Water, Cambridge Water, and the Environment Agency, to ensure options selected can be appropriately served by water and waste water infrastructure. We note that a further screening assessment will be carried out at the draft plan stage.</p>	Support noted.
50353 - RSPB	<p>The impact on designated sites, even if it is not within the District Council area, needs to be a key consideration during the planning of new developments:</p> <ul style="list-style-type: none"> * The impact of an increased population within the plan area on the Breckland SPA features: stone curlew, nightjar and woodlark. * The impact of new developments on water quality around the Ouse Washes. 	Noted. The site assessments, and the HRA includes sites outside the district boundary.

Table 1.2 Representations on Initial Sustainability Report 2012		
Representation Numbers	Summary of Representation	Council's Response
38714, 38710	Support development at Broad location 1, reserve position on development targets.	Noted.
34590	Comment son appraisal of site 275. Incorrectly appraised as environmental issues can be addressed.	Addressed in responses to Rejected SHLAA sites
38183, 37506, 36542, 36541, 36158	Support for rejection of Great Shelford sites.	Noted
36453	Comments on site 27.	Disagree, site correctly scored. The mechanism for scoring sites is clear, and establishes a positive impact reflecting potential for remediation of contamination. If a site was not considered capable of mitigation it would score negatively.
35955	Comments on site 110 and 255	Comments addressed in representations to site options paper.
36620	Comments on Site 52 – Site is not impacted by farm noise.	Comments addressed in representations to site options paper.

Table 1.3 Other Representations of the SA Approach		
Representation Numbers	Summary of Representation	Council's Response
42586	SA does not include an assessment against all the SA criteria in the framework. Indicators are not carried through the assessment of sites. They do not include targets.	The SA framework provides clear reasons why some decision making criteria have not been applied to individual sites. Generally thi is because they would bednd on how a site was developed. The indicators provide a framework for monitoring significant effects, through the Council's Annual Monitoring report. Specific indicators to monitor the implementation of the plan will be developed through the plan making and sustainability appraisal process. It would not be possible to specifically measure the impact of sites or proposals on many of these indicators. In many cases they already closely reflect the testing mechanism established through the site testing

Table 1.3 Other Representations of the SA Approach

Representation Numbers	Summary of Representation	Council's Response
	<p>Guidance requires impact predictions to be supported by evidence, not guessed. For the SCDC qualitative assessment there is no evidence of references to research, discussions or consultation for those who helped carry out the SA to reach their conclusions.</p> <p>Not clear how the Sustainability Assessment of sites relate to the Settlement Summaries Table. The 'Themes' in the Initial SA do not appear in the Settlement Summaries Table. In addition, it is unclear why the Settlement Summaries Table has chosen to summarise only parts of the assessment. It is unclear how the scoring system determines the 'Sustainable Development Potential' of each site. Does not clearly demonstrate how grading related to the 'Sustainable Development Potential' of the site.</p>	<p>framework.</p> <p>The transparent nature of the SA means the source of the information, and the logic for the scoring is readily apparent. Many criteria utilise information from the SHLAA, and this is clearly stated. The sources of information are regularly quoted. They include consultation with bodies like the local highways authority or infrastructure providers, or specialist officers.</p> <p>The settlement summaries are not a substitute for the SA.</p> <p>The Strategic Housing Land Availability Assessment and Sustainability Appraisal Assessments of potential sites identify key constraints and considerations relating to potential development sites including suitability, availability and achievability. In order to draw information together in an accessible form, and reach an overall conclusion on the merits of the sites assessed, key elements from both assessments have been combined in a series of settlement summaries which enable identification of which sites remain options, and which sites warrant rejection.</p>
<p>40626, 45073</p>	<p>Land on the edge of Cambridge high in the sequence of sustainable development locations, is not compared directly to other less sustainable locations for growth. Development on the edge of Cambridge has the most potential to deliver access to the widest range of services and facilities and is the best served location. Criteria are not relevant to urban extensions.</p>	<p>Issue 9 of the Issues and Options 2012 compared broadly the sustainability implications of different locations, including edge of Cambridge, new settlements, and sustainable villages. The accessibility merits of the edge of Cambridge are reflected in a number of the decision making criteria for judging impact on the objectives. Specifically the Access to Services Objective acknowledges the benefits of being close to Cambridge. This includes consideration against new settlement options. A number of Strategy options have been tested in the final SA, which consider the relative sustainability of a</p>

Table 1.3 Other Representations of the SA Approach

Representation Numbers	Summary of Representation	Council's Response
	<p>Help people gain access to satisfying work appropriate to their skills, potential and place of Residence' - not only the provision of jobs on the edge of Cambridge but also the provision of housing on the edge of Cambridge benefits this objective as this would give people easy, affordable access to the pool of jobs. Does not reflect benefits of putting houses near a major employment site.</p> <p>Transport, Reducing the need to travel and promote more sustainable transport choices' the Decision Making Criteria are stated to be based on enabling shorter journeys, improving modal choice and integration of transport modes. However three of the four criteria are based on public transport including distance to the nearest bus stop/railway station and the frequency and length of journey. The likelihood of using the cycle decreases markedly for journeys greater than 5km and therefore the weighting used in the SA is skewed to favour longer journeys.</p> <p>There is no acknowledgement that a large development would bring forward an integrated public transport system with bus stops throughout the development.</p>	<p>range of distribution options for development.</p> <p>The Accession model utilised to assess access to employment does highlight the benefits of a location near to Cambridge, but it also highlights that there are other significant areas of employment in the district.</p> <p>Accessibility of sites has been considered in great detail, and full details of the measurements against individual criteria has been provided as well as using a scoring mechanism.</p> <p>Under the Access to Services objective distance to local services and facilities is measured. Scoring is focused on short distances, supporting walking or cycling opportunities (beyond 1000m is scored as a significant negative). Access to public transport is also an important issue for longer journeys, and is also assessed.</p> <p>Under the objective to secure appropriate investment and development in transport infrastructure, and ensure the safety of the transport network, major developments which would result in significant improvement to public transport, walking or cycling facilities are identified as having a significant positive impact.</p>

Table 1.3 Other Representations of the SA Approach		
Representation Numbers	Summary of Representation	Council's Response
	Northstowe scores highly but services and facilities will not be available from the outset.	The nature of Northstowe, with significant employment provision, high quality public transport via the guided bus, mean that it will score highly against those criteria.
	The Decision Making Criteria related to the Sustainability Objective of reducing the need to travel in particular is not helpful in identifying the most sustainable locations for development because it does not allow for walking; it does not take into account that short cycle journeys are much more likely to be undertaken than longer journeys. We propose an additional Decision Making Criterion to allow for short cycle journeys on foot or by cycle. The likelihood of using the cycle decreases markedly for journeys greater than 5km and therefore the weighting used is skewed to favour longer journeys. Also, it is not recognised that the City offers alternative locations for services and facilities other than in the centre of town.	
45023	<p>It is noted that for the most sustainable rural settlements consideration will be given to Greenfield sites on the edge of settlements. Sites within the development framework of rural settlements must be prioritised for allocation above all other sites.</p> <p>Landscape and Townscape – Sites in Green Belt cannot receive a positive score. Concerned this has not been adequately taken into account. Allocating land outside of the greenbelt is considered a positive when assessing the purposes and function of the</p>	<p>Sites within frameworks have been considered, but only a small number of sites were identified though the SHLAA process.</p> <p>The objective on landscape and townscape character is used to consider impact on the Green Belt. The importance is acknowledged by the fact that built development cannot get a positive impact in the Green Belt. If a site is not in the Green Belt impact on Landscape and townscape must still be assessed, and could still be identified</p>

Table 1.3 Other Representations of the SA Approach

Representation Numbers	Summary of Representation	Council's Response
	Green Belt. Consideration is given to 'distance to centre' as an appropriate indicator to measure a sites suitability to services and facilities. Doesn't take account of nearby services on edge of settlements e.g. Tesco at Cherry Hinton near Fulbourn.	as having negative impacts. The appraisal utilises the distance to a centre as a proxy for accessibility, as the greatest range of services are available there. The Tesco store is around 2km from the site discussed, further than the village centre. It does not merit alternative scoring.

Table 1.4 Representations on Initial Sustainability Report 2013

Representation Numbers	Summary of Representation	Council's Response
54186	Disagree with dismissal of the change to the village framework at Longwood, Dry Drayton (rep 36984, ref 17).	Site in Group village does not warrant allocation in the local plan, and has been correctly assessed.
55704, 55703, 55702, 55701, 55694, 55691, 55684, 55677, 55675, 55653	Frontage N of church St Great Eversden should be included as an important countryside frontage.	Addressed separately, as part of review of Important Countryside Frontages. Does not meet requirements to become an ICF.
55682, 55676, 55674, 55669, 55648, 53680, 51178 LGS	Object to the rejection of Local Green Space designation - Field between Walnut Tree Cottage and the Homestead, Church Street - Great Eversden	Addressed separately, as part of review of potential Local Green Spaces. Within Green Belt therefore would not be designated as LGS.
55121	PVAA at Duxford Managers Lane should be removed.	Assessed in review of Local Green Spaces (PVAA03)
51915	A full SA of site G34 should be undertaken.	The potential for designation as Local Green Space has been objectively assessed against a set of criteria.

Table 1.5 Representations on Initial Sustainability Report 2013 Part 1 Joint with Cambridge City Council

Representation Numbers	Summary of Representation	Council's Response
22603	Should not be assumed that Cambridge needs to grow.	Noted. It is not assumed, but the Councils are required to meet objectively assessed housing needs.
21918	Provision of fibreoptic broadband connection to every dwelling should be mandatory	Noted. This issue is addressed in policy in the draft Local Plan.
21919	There is particular concern that development in the Green Belt at Fulbourn/Teversham will result in loss of identity of the 2 villages.	Noted.
22877, 22902	There is a need for South Cambridgeshire District Council to liaise with Huntingdonshire District Council as well as with Cambridge City Council.	Noted. The Council has worked with other authorities, through the Duty to Cooperate.
23198	Green Belt protects from a certain kind of growth.	Noted.
22612	More people now work at home. Urban conglomeration of Cambridge now out of date.	The Councils are required to meet objectively assessed housing needs.
22617, 22621	Building 10,000 houses will deliver homes for London commuters.	The Councils are required to meet objectively assessed housing needs.
22581	It is commendable that Councils have worked together.	Noted.
21716	The assumption that some Green Belt is 'low-quality' is simply incorrect because the Guidelines do not recognise this distinction. A speedy inspection made in 2012 is not an objective assessment.	The NPPF requires the Councils to consider the consequences of the Green Belt for sustainable development. An intrinsic part of this is considering the quality of the Green Belt, and the consequences of its development. The 2012 review provides a robust objective assessment.
20433	Green Belt needs to be maintained.	Noted.
22586	Two tier assessment is logical	Noted.

Table 1.5 Representations on Initial Sustainability Report 2013 Part 1 Joint with Cambridge City Council

Representation Numbers	Summary of Representation	Council's Response
	approach.	
20434, 22349	Traffic a concern in relation to Trumpington stadium option.	Noted.
20311, 19357	Ice rink would provide opportunities for recreation, particularly for youth	Noted.
21519	Green Belt criteria does not mention access to the public.	Whilst desirable it is not a defining characteristic or purpose of the Cambridge Green Belt.
22641	Air pollution will only be addressed by electric buses. Flood risk rises with more tarmac surfaces.	Noted. Development would be required to avoid increasing flood risk.

Table 1. 6 Other Representations of the SA Approach		
<p>22965 22984</p>	<p>SA has not been undertaken on the Development Sequence, or the effects of the proposed constraint on the edge of Cambridge. The Councils are not in compliance with the SEA Directive as they have not tested the environmental effects of the Plan nor the alternatives; The Duty to Co-operate should extend through the full sequence of the development strategy with a SA undertaken so that the consequences of restricting development on the edge of Cambridge can be considered in entirety.</p> <p>The predicted environmental effects of the Plan including the alternatives are not presented to the public or decision makers and not therefore in compliance with the SEA Directive;</p> <p>As the Plan currently stands, the Councils are saying that the Green Belt is more important than all the other Sustainability Topics and Objectives together without understanding the effects on sustainability issues;</p> <p>Some proforma criteria are not SA matters.</p>	<p>The Councils have undertaken an SA of the full development sequence, and the impacts of focusing development at different levels in the sequence. They have also compared a number of site packages, three of which included varying scales of growth on the edge of Cambridge. The impacts of alternative strategies have been fully understood.</p> <p>The Councils have produced evidence for the reasons for the development strategy.</p> <p>Potential for large scale development to included mixed uses such as housing or employment was noted in the assessment.</p> <p>The proforma is clear how the criteria were developed, and their purpose as a joint tool.</p>

Table 1.7 Proposed Submission Representations Received on the Sustainability Appraisal - Draft Final Sustainability Report	
	<p>Total: 14 Support: 2 Object: 12</p>
Main Issues	<p>Support</p> <p>Natural England – the methodology, assessment and recommendations in the report generally meet the requirements of the SEA Regulations in assessing the effects of the Plan on environmental, social and economic objectives. The Sustainability Appraisal identifies appropriate mitigation to offset adverse effects and this appears to have been implemented through the relevant Plan policies.</p> <ul style="list-style-type: none"> • Support the inclusion of the land north of West Street, Comberton within the village framework <p>Object</p> <p>Cambridge South -</p> <ul style="list-style-type: none"> ○ Requirements of SA have not been adhered to. Ignores presumption in favour of Sustainable Development. ○ A Joint SA has not been undertaken with Cambridge City Council. ○ Sites on edge of Cambridge were rejected (at issues and options 2) before full impacts were known. ○ High level alternative of no development on edge of Cambridge should have been assessed jointly. Adverse effects of decision are not fully identified, therefore cannot be mitigated and monitored.' ○ A joint SA has not been undertaken of the approach agreed in the memorandum of understanding regarding housing distribution in the sub region. ○ Cumulative and residual effects of rejecting the edge of Cambridge are not known. ○ Ignores SCDC initial SA that edge of Cambridge is most sustainable. ○ The Plan is made without thorough knowledge of the likely effects of the Development Strategy on the Sustainability Topics and Objectives. Consultation is therefore flawed. ○ SA criteria do not give enough weight to walking and cycling opportunities for short journeys. The Air Pollution criteria does not address effect of minimising car journeys. ○ No measures have been envisaged to prevent, reduce and as fully as possible offset any significant adverse effects. ○ Green Belt has taken precedence over other sustainability issues. Green Belt is only one of twelve sustainability issues in NPPF.

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	<ul style="list-style-type: none"> ○ Green Belt review was flawed. ○ Sites have been rejected before consideration of offsetting adverse effects. ○ Joint site proforma mixes planning and sustainability criteria. ○ Green Belt is not a landscape issue, and should not have been linked to these objectives. ○ Rejection did not have due regard to Cambridge South Masterplan. ○ Has not assessed a 'no plan', or 'business as usual' option ○ Plan will set in place a framework for development, infrastructure and other projects in the Plan period, with increased commuting, use of fuel, production of CO2 which will have cumulative and residual effects beyond the Plan period. • Cambridge South East should be reassessed. <ul style="list-style-type: none"> ○ Green Belt has been prioritised over other objectives, resulting in less sustainable sites being chosen, despite Green Belt not being included in SCDC framework. No explanation for this is given. ○ Not chosen most sustainable option regarding housing numbers. Higher numbers identified as more sustainable in the SCDC SA. ○ Failed to consult on joint site testing proforma. ○ SCDC have not followed their own SA which highlights sustainability of edge of Cambridge. They have allocated other sites which will require substantial mitigation measures. ○ Failed to consider measures to mitigate Green Belt impacts. ○ Does not acknowledge edge of Cambridge provides best access to employment. ○ On transport SAs of Major sites at issues and options highlight lack of road capacity, but at later stages that they are most sustainable. ○ Councils Inner Green Belt Review document is flawed. • Fulbourn – Land at Cow Lane and Teversham Road. Designation as Local Green Space not properly assessed. Should be allocated for residential development. • Great Shelford – Land at Cambridge Road – Should have appeared in all packages of site options, as is top of the settlement hierarchy. • Fowlmere - Land west of High Street - SA fails to consider site conditions, including landscape impact, or acknowledge potential for mixed use, and an employment use buffer between site and industrial units. • Harston - Land to the rear of 98 - 102 High Street – SA fails to
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Table 1.7 Proposed Submission Representations Received on the Sustainability Appraisal - Draft Final Sustainability Report	
	<p>consider site conditions, including landscape and townscape impact, and impact on listed buildings.</p> <ul style="list-style-type: none"> • Objections to Bourn Airfield and Cambourne West, that developments are not sustainable.
Assessment	<p>Issues raised in objections are shown in <i>italics</i> below, followed by the Council's response.</p> <p><i>'Requirements of SA have not been adhered to.'</i></p> <ul style="list-style-type: none"> • The Sustainability Appraisal process has followed government guidance on SA and SEA and the requirements of the SEA Regulations. <p><i>Ignores presumption in favour of Sustainable Development.</i></p> <ul style="list-style-type: none"> • Sustainable Development encompasses a full range of economic, social and environmental issues. The Councils consider that they have taken an appropriate approach to balancing the potential benefits and adverse effects of development on the edge of Cambridge, by permitting a significant scale of development, but avoiding a scale of development that would cause significant harm. <p><i>A Joint SA has not been undertaken with Cambridge City Council.</i></p> <ul style="list-style-type: none"> • A joined up approach to sustainability appraisal was taken with Cambridge City Council. Joint working began early in the plan making process, at the issues and options stage. This included a review of the sustainability implications of potential development strategies, and a joint approach to reviewing sites on the edge of Cambridge. This was followed by an appraisal of strategic development options (the general locations growth could take place at in the development sequence), and potential development site packages was considered by the Joint Planning and Spatial Planning Group on 22nd May 2013. This was included in the Draft Final Sustainability Report. <p><i>Sites on edge of Cambridge were rejected (at issues and options 2) before full impacts were known.</i></p> <ul style="list-style-type: none"> • At the Issues and Options 1 stage consideration of the sustainability implications of development strategy options was provided in the Initial Sustainability Report which accompanied the consultation. The Councils also considered the sustainability implications of development in 10 broad locations around Cambridge. At the Issues and Options 2 stage, the Cambridgeshire Joint Strategy Unit undertook a Sustainable Development Strategy Review, highlighting key themes for consideration through the plan making process. Having completed a joint SA of individual land parcels on the edge of Cambridge, a number of sites were identified as options, and a larger number identified for rejection. The reports provided clear reasons for their proposed rejection. All were included in the consultation.

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	<p><i>A joint SA has not been undertaken of the approach agreed in the memorandum of understanding regarding housing distribution in the sub region.</i></p> <ul style="list-style-type: none"> Cambridge City and South Cambridgeshire are both planning to meet their objectively assessed needs for housing and jobs, having considered a range of alternative approaches. <p><i>Cumulative and residual effects of rejecting the edge of Cambridge are not known.</i></p> <ul style="list-style-type: none"> The SA compares the impacts of different development strategies, and identifies cumulative impacts of the plan. <p><i>'Ignores SCDC initial SA that edge of Cambridge is most sustainable.'</i> <i>'Green Belt has taken precedence over other sustainability issues. Green Belt is only one of twelve sustainability issues in NPPF. "SCDC have not followed their own SA which highlights sustainability of edge of Cambridge. They have allocated others sites which will require substantial mitigation measures.'</i></p> <ul style="list-style-type: none"> The initial SA highlighted potential benefits to some objectives, and negative impacts to others. It also highlighted uncertainties regarding impact on some objectives, including landscape and townscape. The impacts were explored further at later stages of the assessment process. As highlighted in the SA (page 26), 'The edge of Cambridge is the most sustainable location when tested against a range of objectives for growth in the development sequence in South Cambridgeshire, but the SA identifies the importance of balancing the accessibility aspects of sustainable development and the environmental and social benefits it brings, with the significant harm to the landscape and setting environmental aspects of sustainability that development on land in the Green Belt would have, with the resulting irreversible adverse impacts on the special character and setting of Cambridge as a compact historic city and the risks that could have to the economic success of the Cambridge area, which is in part built on its attractiveness as a place to live and work.' <p><i>The Plan is made without thorough knowledge of the likely effects of the Development Strategy on the Sustainability Topics and Objectives. Consultation is therefore flawed.</i></p> <ul style="list-style-type: none"> Each stage of the plan making process was accompanied by sustainability appraisal information. The impacts of the plan on sustainability objectives have been explored. A high level joint assessment of development strategies was undertaken, as well as more detailed assessments of sites and policies. The cumulative impacts of the plan as a whole have also been explored. <p><i>SA criteria do not give enough weight to walking and cycling opportunities for short journeys. The Air Pollution criteria does not address effect of minimising car journeys.</i></p> <ul style="list-style-type: none"> Rather than including it within other themes, sustainable transport was
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	<p>drawn out into a separate theme to assess impacts in more detail, rather than including it in air quality theme, allowing this theme to focus on air quality issues. Therefore, the effects of minimising car journeys are addressed under the sustainable transport objective.</p> <ul style="list-style-type: none"> • Accessibility of sites has been considered in great detail, and full details of the measurements against individual criteria has been provided as well as using a scoring mechanism. Under the 'Access to Services' objective distance to local services and facilities is measured. Scoring is focused on short distances, supporting walking or cycling opportunities (beyond 1000m is scored as a significant negative). Access to public transport is also an important issue for longer journeys, and is also assessed. <p><i>No measures have been envisaged to prevent, reduce and as fully as possible offset any significant adverse effects.</i></p> <ul style="list-style-type: none"> • Mitigation measures are specifically identified in Part 3 section 4.2 and Appendix 5 of the Draft Final Sustainability Report. It should be noted that at this later stage in plan-making and SA the Local Plan had already taken included substantive mitigation measures identified earlier in the SA process. Several further enhancements to policies were proposed in Appendix 5. <p><i>'Green Belt review was flawed.'</i> <i>'Councils Inner Green Belt Review document is flawed.'</i></p> <ul style="list-style-type: none"> • The Inner Green Belt Study provided an effective review of the impact of development on the qualities and purposes of the Cambridge Green Belt. <p><i>'Sites have been rejected before consideration of offsetting adverse effects.'</i> <i>'Failed to consider measures to mitigate Green Belt impacts.'</i></p> <ul style="list-style-type: none"> • The review of sites considered whether mitigation measures would be possible. Where sites were rejected it was determined that significant impacts were not capable of effective mitigation. <p><i>'Joint site proforma mixes planning and sustainability criteria.'</i> <i>'Failed to consult on joint site testing proforma.'</i></p> <ul style="list-style-type: none"> • Links to the sustainability criteria in the joint proforma are clearly established in the Sustainability Appraisal. Criteria in the joint proforma were reviewed to ensure they addressed all the sustainability objectives of both authorities. The Issues and Options Reports and Initial Sustainability Appraisals were also subject to consultation with the statutory environmental authorities before the Draft Final Sustainability Appraisal was prepared. All bodies commented through the consultation, and did not raise concerns with the form or methodology of assessment. <p><i>'Green Belt is not a landscape issue, and should not have been linked to these objectives.'</i> <i>'Green Belt has been prioritised over other objectives, resulting in less sustainable sites being chosen, despite Green Belt not</i></p>
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	<p><i>being included in SCDC framework. No explanation for this is given.'</i></p> <ul style="list-style-type: none"> • The Scoping process makes clear that Green Belt issues relate to the 'Maintain and enhance the diversity and distinctiveness of landscape and townscape character' objective. Impact on the purposes of the Green Belt relate to impact on this objective (identified in the Joint Interim Sustainability Appraisal Appendix 1). The Green Belt purposes recognise the landscape and townscape qualities important to the edge of Cambridge. It is sound to use these as a guide for considering landscape and townscape impacts. Paragraph 80 of the NPPF clearly acknowledges that preserving the setting and special character of historic towns is a Green Belt purpose. Where there is a significant impact on the Green Belt there would be a consequent significant impact on the Landscape and Townscape objective. • All edge of Cambridge sites were subject to a full assessment, not just the level one criteria which highlighted key strategic issues. Decisions to reject sites were therefore taken in light of full information on their potential merits and impacts. <p><i>'Rejection did not have due regard to Cambridge South Masterplan.'</i></p> <ul style="list-style-type: none"> • The site was rejected following a robust assessment process. <p><i>'Has not assessed a 'no plan', or 'business as usual 'option''</i></p> <ul style="list-style-type: none"> • The SEA regulations require 'the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of areas likely to be significantly affected.' This is addressed in Part 2: Scoping Report, Section 6, and the topic Appendices 1-12 and Appendix 13 which sets out the characteristics of the European sites designated under Directives 79/409/EEC and 92/43/EEC. The SEA Directive and Regulations do not require that a 'business as usual' or 'no plan' option be assessed, only that reasonable alternatives are assessed. UK Government guidance on SEA and SA also advises against creating alternatives for the sake of it. <p><i>'Not chosen most sustainable option regarding housing numbers. Higher numbers identified as more sustainable in the SCDC SA.'</i></p> <ul style="list-style-type: none"> • The initial sustainability appraisal identified the complex relationship between housing targets and various sustainability objectives. The Council has explored the impacts of different options before determining that an option based on the objectively assessed needs was the best choice for the district. <p><i>'Does not acknowledge edge of Cambridge provides best access to employment.'</i></p> <ul style="list-style-type: none"> • The sustainability appraisal of strategic approaches recognises that development in Cambridge would deliver housing closest to the highest concentration of jobs, and that edge of Cambridge sites is the next closest option. Proximity of employment is also acknowledged in
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Table 1.7 Proposed Submission Representations Received on the Sustainability Appraisal - Draft Final Sustainability Report	
	<p>individual site assessments.</p> <p><i>‘On transport SAs of Major sites at issues and options highlight lack of road capacity, but at later stages that they are most sustainable.’</i></p> <ul style="list-style-type: none"> • The individual site assessments highlight the current lack of road space to accommodate the scale of development that a new settlement would bring. They also highlighted the potential for significant improvements to public transport networks. • The sustainability appraisal of strategic approaches recognises that highway capacity issues are considered capable of mitigation, and there is potential for investment in public transport infrastructure which performs better than more dispersed development strategies. <p><i>‘Of the major settlements, housing only scores as significant positive on Northstowe extension.’</i></p> <ul style="list-style-type: none"> • The impact is differentiating the potential scale of delivery during the plan period, with Northstowe delivering a larger number in the plan period. <p><i>‘Not clear why packages 6 and 7 do not score well in terms of access to employment’</i></p> <ul style="list-style-type: none"> • The assessment is of the package as a whole. The packages include development away from Cambridge which does not score so highly in terms of this objective. Individually, the accessibility to employment of sites on the edge of Cambridge has been acknowledged. <p><i>‘Plan will set in place a framework for development, infrastructure and other projects in the Plan period, with increased commuting, use of fuel, production of CO₂ which will have cumulative and residual effects beyond the Plan period.’</i></p> <ul style="list-style-type: none"> • The SA acknowledges that further development on edge of Cambridge would have benefits for some objectives, including sustainable travel. However, this must be considered against the impact against other objectives. The potential cumulative impacts of this decision are highlighted by table 4.5. • Local Green Space was subject to a general SA and an assessment against criteria relevant to the designation. The site in Fulbourn was considered for residential development and was rejected. • Great Shelford – Land at Cambridge Road was considered in development packages through the iterative process of plan making, but was eventually discounted due to site specific reasons documented in the audit trail. • Fowlmere - Land west of High Street and Harston - Land to the rear of 98 - 102 High Street - Land west of High Street were tested in the SA, including considering site conditions, but rejected.
Approach in Submission Local Plan	No change.