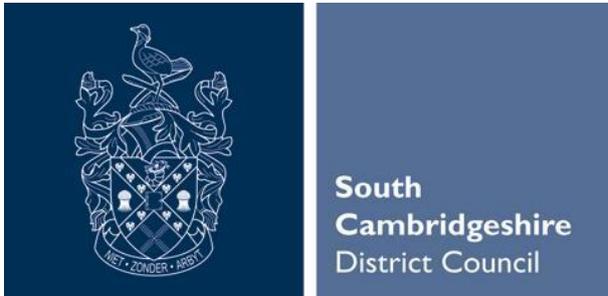


## SC8/SCDC – Supplement 2



Examination into the Soundness of the  
South Cambridgeshire Local Plan

**Matter SC8 – Promoting Successful  
Communities – Supplement 2: Council’s  
Response to Submissions on behalf of  
Grosvenor/Wrenbridge: Day 32 SC8D SC/4 –  
Meeting Community Needs’ (RD/GRO/010)**

South Cambridgeshire District Council

9 December 2016



## Introduction

1. At the Matter SC8 Hearing on 8 November, Grosvenor Wrenbridge submitted a paper 'Submissions on behalf of Grosvenor/Wrenbridge: Day 32 SC8D SC/4 – Meeting Community Needs' (RD/GRO/010). The Council was invited to provide a written response.

## Council's Response

2. The Grosvenor Wrenbridge document (RD/GRO/010) was described as providing a chronology of events relating to the Community Stadium Issue. However, it also provides a view on the outcome / approach in the conclusions section.
3. The Council wishes to reiterate the response it provided to Question SC4ii of its Matter SC/4 statement.
4. In Table 1 below the Council has reviewed the elements of the Grosvenor Wrenbridge document, and provided a response.
5. In summary the Council's response to the conclusions of the Grosvenor Wrenbridge document are:
  - The evidence and consultation results prior to submission were fully considered by the Councils. As stated in paragraph 85 of the Council's SC8D statement, there are some potential benefits to a community stadium scheme, highlighted by the studies, but the Councils have to make a judgement on whether a need has been demonstrated so as to justify allocation of land for a community stadium in the submitted Local Plans, and in particular whether need is sufficient to provide exceptional circumstances for a review of the Green Belt, which would be the unavoidable consequence of such an allocation given potentially available sites. It is not considered that the need has been demonstrated to justify a Green Belt review, particularly given the harmful impacts identified for the sites tested on the purposes of the Green Belt, or to justify an allocation of land within the submitted Local Plans for a community stadium.
  - Both the PPS and ISFS provide clear, deliverable strategies for providing the necessary sports provisions over the Plan period. Both strategies have been developed in accordance with Sport England's methodology which has involved significant consultation with pitch/facility providers and users as well as the relevant National Governing Bodies. The strategies provide an action list of where new provision should be provided on-site and how off-site contributions should be used to support new and improved provision. The strategies did not establish that there was a need for a community stadium in order to meet the identified needs.
  - Updating the supporting text of the plan to reference the outcome of the Playing Pitch Strategy and the Indoor Facilities Strategy is an appropriate and

Matter SC8: Promoting Successful Communities – Supplement 2  
Statement by South Cambridgeshire District Council  
December 2016

reasonable response to new evidence that has become available after the Submission of the Local Plans particularly where the evidence responds to representations by the sporting body. It is entirely appropriate and sound that the Councils propose modifications at this stage. The proposed modifications provide additional supporting text that correctly reflects the outcome of those studies. It is not correct to say that prior to these studies the South Cambridgeshire Submission plan supported the principle of identification of a site for a Community Stadium.

**Table 1**

<b>Grosvenor/Wrenbridge's comments</b>	<b>Councils' comments</b>
<p>1. Grosvenor/Wrenbridge's objection to CLP policy 73 (rep 27128) was made (in part) on the basis of the references made in CLP (RD/Sub/C/101 paras 8.13, 8.14) to the joint assessment (with S Cambs) to identify an appropriate and deliverable site for a community stadium, which "could contribute to" the "current under-provision of various sports facilities" in the area.</p>	<p>Noted</p>
<p>2. SCLP (paras 9.16-9.18) also refers to the "desirability" of facilities of sub-regional significance (including a community stadium), and states that as no non-Green Belt sites were likely to be made available any proposal for such a facility in the GB would have to show exceptional circumstances if the site was to be allocated.</p>	<p>Paragraphs 9.16 – 9.18 in the South Cambridgeshire Submission Local Plan as submitted read as follows:</p> <p>"9.16 A number of facilities some of sub regional significance have been identified in studies prepared by Cambridgeshire Horizons, an organisation which was charged to help implement earlier development proposals in the Cambridge area but which was wound up in 2011.</p> <p>9.17 Recognising the desirability of such facilities, Cambridge City Council and South Cambridgeshire District Council explored whether there was a need and possible site options for accommodating a community stadium, ice rink and concert hall in updating their Local Plans. Public consultation revealed that sites explored through the Local Plan outside the Green Belt were unlikely to be made available by their owners for such facilities. On the evidence available and the results of public consultation, the two Councils were not convinced that a compelling case exists amounting to the exceptional circumstances necessary in national planning policy for allocating a community stadium or other facilities in the Green Belt.</p> <p>9.18 In the absence of policies in the Plan, should any proposals subsequently come forward they would be considered on an exceptional basis on the evidence at the time, and if proposed in the Green Belt would have to demonstrate there is a need amounting to exceptional circumstances, and they comply with the National</p>

	<p>Planning Policy Framework, and in particular the sequential approach to town centre uses, and other policies in the Local Plan.”</p> <p>In their Matter SC8 Statement the Council proposed modifications to paragraph 9.18:</p> <p>In the absence of policies in the Plan, should any proposals subsequently come forward they would be considered on an exceptional basis on the evidence at the time, <del>and if</del> . <u>If</u> proposed in the Green Belt <b><u>it would have to comply with the national policy and local plan policy regarding Green Belt,</u></b> <del>demonstrate there is a need amounting to exceptional circumstances,</del> and they <b><u>It would also have to</u></b> comply with the National Planning Policy Framework<sup>1</sup>, and in particular the sequential approach to town centre uses, and other policies in the Local Plan.</p>
<p>3. That objection proposes the allocation of land at Trumpington and at the existing Abbey Stadium for a community football stadium, other sports facilities and residential development. This is for later consideration at this Examination.</p>	<p>Noted</p>
<p>4. It is however relevant to be aware that the objector’s project has changed since it was first advanced and then considered as part of the LP process. Previously, it was proposed that the Abbey Stadium would be redeveloped and a new community stadium for CUFC (and possibly other clubs), together with a range of other sports facilities and housing, would be developed on land partly in the Green Belt at Trumpington; now, planning applications have been made which retain and upgrade the Abbey Stadium but still propose a range of other sports facilities at Trumpington.</p>	<p>The proposal has changed, but no detailed information on the planning applications have been provided by the applicant to the Inspectors examining the Local Plan.</p>
<p>5. Modifications are now proposed to both LPs (CC5/CCC Supp 1, table after para 9; SC8/SCDC paras 94, 96) the effect of which would be to remove the stated intention to find a site for a community stadium and to assert that no need for such a stadium has been</p>	<p>As highlighted by point 2 above, it is incorrect to state that the South Cambridgeshire Submission Local Plan includes ‘a stated intention to find a site for a community stadium’.</p>

<sup>1</sup> RD/NP/010 [National Planning Policy Framework](#)

<p>identified.</p>	<p>On 7 September 2016, the hearing session for Matter CC5: Services and Local Facilities was held. Cambridge City Council put forward modifications to paragraphs 8.11, 8.13 and 8.14 of the emerging Cambridge Local Plan to reflect the findings of the PPS and ISFS. These modifications are contained in CC5/CCC – Supplement 1. One reference to ‘community stadium’ was removed from paragraph 8.14. References to ‘community stadium’ remain in paragraphs 2.56 and 8.13, whilst a ‘community sports stadium’ is referred to in Policy 73: Community, sports and leisure facilities.</p> <p>On 9 November 2016, the hearing session for Matter SC8: Promoting Successful Communities was held. South Cambridgeshire District Council put forward a modification in the Council’s hearing statement (Appendix 3) to reflect the findings of the PPS and ISFS. The modification is proposed to the end of paragraph 9.17 as follows:</p> <p><u>“...On the evidence available and the results of public consultation, the two Councils were not convinced that a compelling case exists amounting to the exceptional circumstances necessary in national planning policy for allocating a community stadium or other facilities in the Green Belt. This position has been confirmed through the Playing Pitch Strategy and the Indoor Sports Facilities Strategy which were completed in June 2016. Neither of these strategies identified a need for the level of additional provision which would be provided in the Greater Cambridge area by a sub-regional sports facility and/or a community stadium.”</u></p>
<p>6. The only reason for the changes given by both Councils is that the recent Playing Pitch Strategy and Indoor Sports Facility Strategy (RD/CSF/190, 200; both June 2016) do not identify a need for a community stadium.</p>	<p>Noted. Neither the Playing Pitch Strategy nor the Indoor Sports Facilities Strategy (RD/CSF/190 and RD/CSF/200) identify the need for a community stadium.</p> <p>The reasons for the Proposed Modifications are detailed in the Council’s Matter SC/4 Statement paragraphs 87 to 95. For the</p>

	Cambridge Local Plan the reasons are provided in CC5/CCC – Supplement 1.
7. The objector says these changes are not justified and should not be made.	The Councils consider that these modifications are justified and relate to the production and the findings of the Playing Pitch Strategy and the Indoor Sports Facilities Strategy (RD/CSF/190 and RD/CSF/200). These modifications are necessary to properly reflect the evidence base and to make the plans sound.
<b>PINS guidance – Procedural Practice in the Examination of Local Plans (June 2016)</b>	
8. Para 5.20 states there is a “very strong expectation” that further (post-submission) LPA-led changes to the plan will not be necessary, and that: “Provision for changes after submission of the plan is to cater for the unexpected.” Plainly those circumstances do not exist here.	<p>As a part of the examination process, it is usual to put forward modifications. During the examination, Inspectors can recommend ‘main modifications’ (changes that materially affect the policies) to make a submitted Local Plan sound and legally compliant only if asked to do so by the local planning authority under Section 20(7C) of the 2004 Planning and Compulsory Purchase Act (as amended). The Council can also put forward ‘additional modifications’ of its own to deal with more minor matters.</p> <p>The majority of plans are subject to a request from the local planning authority under Section 20(7C) of the 2004 Act for main modifications to be recommended by the Inspector where necessary to make the plan sound. These will be based on the discussions at the hearing sessions. The Councils made a request under Section 20 (7C) of the 2004 Act on 03 November 2014 (Reference Documents RD/GEN/130 and RD/GEN/140). The modifications at issue here are necessary to properly reflect the currently available evidence base. Indeed, were these modifications not made then at adoption this element of the plan would already be out of date since it does not reflect the PPS and ISPS. For the Plans to be adopted so as to give rise to such a consequence would plainly not be sound within the terms of the NPPF para.182.</p> <p>Under the delegation process agreed by Full Council at the meeting on 13 February 2014 (Cambridge) and 13 March 2014 (South Cambridgeshire), additional modifications have been put forward in</p>

	order to assist the Inspectors and provide clarification during the examination process. The Inspectors will determine in due course whether they consider the modifications are necessary and if so whether they are main or additional.
<p>9. Para 5.21 deals with process. The Inspectors no doubt have this matter in hand.  However, it is unclear whether bodies such as CUFC and Sport England have been consulted on the proposed mods; the objector does not believe that they have.</p>	<p>Any modifications made to the emerging Local Plan need to follow the delegation process agreed by the Full Councils on 13 February 2014 and 13 March 2014 which confirms that delegated authority be given to the heads of service to make further additions to the schedules of changes during the course of the examination (except where changes would be of such significance as to substantially alter the meaning of a policy or allocation) and that the exercise of this delegation be reported back to committees through the course of the examination process. Main modifications have been reported as part of the Proposed Modifications consultation in Winter 2015 and further main modifications will be reported to committee prior to public consultation in due course. The Inspector has previously advised the Councils during hearing sessions that she would prefer to hold only one further round of public consultation at the end of the hearings. No further public consultation on modifications has yet been timetabled. CUFC, Sport England and indeed any other organisation or individual will be entitled to make representations in respect of any main modifications in due course.</p>

### Chronology

<b>Grosvenor/Wrenbridge's comments</b>	<b>Councils' comments</b>
<p>10. 2005: A Major Sport Facilities Strategy for the Cambridge Sub-Region (Cambridgeshire Horizons) (RD/CSF/010). Community Football Stadium identified as a "Sub-Regional Priority" (pp.3, 13 tbl ii).</p>	<p>The Cambridgeshire Horizon's strategy "A Major Sports Facilities Strategy for the Cambridgeshire Sub-Region" (RD/CSF/010) was published in 2006. A Community Football Stadium was identified as a sub-regional priority (Page 3).</p>
<p>11. April 2008: Cambridge Community Stadium Feasibility Study (PMP) (RD/CSF/030). 3 possible sites shortlisted (Milton, Cambridge East, Cowley Road). "Next steps" (ES.27 p.v) included engaging club</p>	<p>Cambridgeshire Horizons commissioned PMP to undertake the Cambridge Community Stadium: Feasibility Study (RD/CSF/030). This was published in April 2008. Three sites were shortlisted: Milton</p>

<p>partners and refining objectives in order to prioritise sites.</p>	<p>adjacent to the A10/A14, Cambridge East, and Cowley Road (Cambridge Northern Fringe East). The report provided recommendations for taking the community stadium development forward under the following headings:</p> <ul style="list-style-type: none"> <li>• confirm ownership of the scheme;</li> <li>• confirm a vision and key objectives for the scheme;</li> <li>• engage club partners;</li> <li>• use refined objectives to prioritise sites;</li> <li>• stimulate political will for the scheme.</li> </ul>
<p>12. March 2012: NPPF Ch 8 “Promoting healthy communities”, in particular para 70 – need to plan positively for community facilities incl sports venues.</p>	<p>The Councils are aware of the contents of Chapter 8 of the NPPF and are planning positively for community facilities (such as sports venues). This will be delivered through the implementation of the PPS and ISFS.</p>
<p>13. June 2012: Cambridge Local Plan –Towards 2013: Issues and Options Report (RD/LP/240). Qs11.42-51: need for new sub-regional stadium, type/size, location; specific Qs about Abbey Stadium and Grosvenor’s then proposals. [NB objector has not been able to find Summary of Reps relating to this.]</p>	<p>Cambridge Local Plan – Towards 2031: Issues and Options Report (RD/LP/240) included Questions 11.42 – 11.51 and option 179 on the community stadium, including question 11.42 - Is there a need for a new Sub-Regional Stadium?. All of the responses to this section of the Issues and Options Report were provided as key issues to Option 179. Key issues for Option 179 can be found in Appendix A to the report on Key Issues arising from Issues and Options consultation to Development Plan Scrutiny Sub-Committee on 16 October 2012 (RD/CR/290) or in the audit trail for Policy 73: Community and Leisure Facilities in the Statement of Consultation and Audit Trails (RD/Sub/C/080) pages 564 to 589.</p>
<p>14. July 2012: SCLP Issues and Options Report – Public Consultation (link provided in RD/LP/030). Issue 84 (p.175) was Community Stadium; para 11.15 referred to Grosvenor proposal at Trumpington; Q84 was whether there was a need for a community stadium, and if there was what type and size should it be, and where was most appropriate location.</p>	<p>The South Cambridgeshire Issues and Options Report (RD/LP/030) referred to the Grosvenor proposal at paragraph 111.15 and the community stadium was addressed in Issue 84: Community Stadium and Question 84 (a &amp; b) in terms of whether there was a need for a community stadium, the type and size of facility required and the appropriate location.</p>
<p>15. Unknown date later in 2012: Summary of Reps to Issues and Options (link provided in RD/LP/030). Need: 117 support (80%), object 13 (9%), comment 16 (11%).</p>	<p>Results of the Issues and Options 2012 consultation (RD/LP/030).  Question 84:  A. Is there a need for a community stadium? (Support: 117, Object: 13, Comment: 16)  B. If there is a need, what type and size of facility should it be, and</p>

	<p>where is the most appropriate location? (Support: 75, Object: 19, Comment: 19)</p>
<p>16. January 2013: Major Facilities Sub Regional Facilities in the Cambridge Sub Area – Review of Evidence and Site Options (CCC/SCDC) (RD/CSF/020). Site options summarised at p.2 (see also sect 4 pp.17-20, sect 7 pp.28-36, and Annex 1): these included existing Abbey Stadium (as was or enlarged to include allotments to S) and Grosvenor’s site at Trumpington. Conclusions (p.11 paras 2.39-2.41) acknowledged potential benefit to Cambridge Sub-Region of a community stadium. Also: “In terms of whether there is a need, it is considered that demonstrable need is a subjective issue, and should be tested further through public consultation.”</p>	<p>Noted. Major Facilities Sub Regional Facilities in the Cambridge Sub Area – Review of Evidence and Site Options (RD/CSF/020) included consideration of a number of sites and stated at paragraph 2.41: “In terms of whether there is a need, it is considered that demonstrable need is a subjective issue, and should be tested further through public consultation. The Councils did ask questions relating to the need for a facility, the type and size, and the most appropriate location during the Issues and Options consultations in the summer (2012). However, no overall conclusions have been reached at this stage and it is considered that the question of need should be raised again in light of the current joint consultation, and in considering site options.”</p>
<p>17. Jan 2013: Issues &amp; Options 2 Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge (RD/LP/150). Chapter 10: Sub-Regional Sporting, Cultural and Community Facilities. (Conson period ended on 18 February 2013). Under the heading “Community Stadium” para 10.2 says this term “is used to describe a sports stadium facility that delivers amenities and services to local communities beyond its core operations (examples are then given). Para 10.7 set out “Principles for a Community Stadium”; 10.8 refers to previous exploration of site options and to the constraint imposed by the Green Belt. Qs 4-6 asked about the need and principles for a community stadium, and whether exceptional circumstances existed for a GB review. Under the heading “Potential Community Stadium Site Options” paras 10.11-10.13 identified 9 of these, including Abbey Stadium plus allotments and Trumpington. Q7 asked which of the site options (if any) were supported. Pp.72-89 described the site options and set out their Pros and Cons.</p>	<p>Issues &amp; Options 2 Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge (RD/LP/150) was subject to public consultation in January and February 2013. Chapter 10 of the Issues and Options 2: Part 1 document addresses sub-regional sporting, cultural and community facilities.</p>
<p>18. Jan 2013: Interim Sustainability Appraisal of Issues &amp; Options doc (RD/LP/160) sect 4 (p.11). Para 4.2 refers to previous Issues and Options Consultation about the need/location of sporting etc facilities;</p>	<p>Interim Sustainability Appraisal of Issues &amp; Options 2 document (RD/LP/160) was produced and made available for the public consultation in January and February 2013 as part of Issues and</p>

<p>para 4.3 specifically to a community stadium and to Grosvenor’s then proposal. Para 4.5 says it had been decided to consult again on the need for a community stadium and “the principles that could form part of a vision for” it.</p>	<p>Options 2. Chapter 4 of the Interim Sustainability Appraisal (RD/LP/160) addresses sub-regional sporting, cultural and community facilities.</p>
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**The rest of sect 4 refers to the consultation document (see 17 above), and to alternatives considered in RD/CSF/020 and the outcome of that (see 16 above).**

<b>Grosvenor/Wrenbridge’s comments</b>	<b>Councils’ comments</b>
<p>19. Unknown date in 2013 (but assumed to be before Submission Local Plans published in July): Summary of Representations on RD/LP/150 (link provided in RD/LP/050): (i) Paras 10.1-10.6: 106 support, 9 object, 15 comment  (ii) Paras 10.7 &amp; 10.8: 58 support principles for community stadium, 5 object, 2 comment  (iii) Q4 (is there a need?): support 384 (67%), object 70 (12%), comment 121 (21%).  (iv) Q5 (do you agree with the principles?): support 331 (85%), object 33 (8.5%), comment 25 (6.5%)  (v) Q6 (exceptional circs for review of GB?): support 303 (78%), object 62 (16%), comment 6%  (vi) Q7 (site options): support 238 (75%), object 27 (8%), comment 54 (17%).  Figs given in summary of Q7 responses suggest 220 (69% – incl Cambs CC) support  CS5 Trumpington, but on the page relating to CS5 the figs are 87 support (43.5%), 93 object (46.5%), 20 comment (10%). In any event this was by a clear margin the site with the highest % of support.</p>	<p>Issues &amp; Options 2 Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge (RD/LP/150)  Key Issues:  Paras 10.1 to 10.6 (Introduction – community stadium issues) Support:106 Object:9 Comment:15  Paras 10.7 &amp; 10.8 (Principles for a Community Stadium) Support:58 Object:5 Comment:2  Q4. Do you think there is a need for a community stadium serving the sub-region?  Support:384 Object:70 Comment:131  Q5. Do you agree with the principles identified for the vision for a community stadium?  Support:331 Object:33 Comment:25  Q6. If a suitable site cannot be found elsewhere, do you think the need is sufficient to provide exceptional circumstances for a review of the Green Belt to accommodate a community stadium?  Support:303 Object:62 Comment:23  Paras 10.9 to 10.13 (Potential Community Stadium Site Options)</p>

	<p>Support:24 Object:23 Comment:12</p> <p>Q7. Which if any of the following site options for a community stadium do you support or object to, and why?  Support: 238 Object: 27 Comment: 54  Site CS5 at Trumpington had the highest level of support.  Support:87; Object: 93; Comment: 20 In addition, petition with 140 signatories opposing the site.</p>
<p>20. July 2013: Proposed Submission CLP and SCLP published. Both must have taken account of the Jan 2013 documents and (it is assumed) the outcome of consultation.</p>	<p>Both Local Plans were published for consultation in July 2013. Both Local Plans took into account the findings of earlier stages of consultation.</p> <p>Consultation results reported to and considered by South Cambridgeshire:</p> <ul style="list-style-type: none"> <li>• Member Workshop of 23 April 2013</li> <li>• Planning Policy and Localism Portfolio Holder Meeting 11 June 2014</li> <li>• Cabinet 11 July 2013 (Considering Proposed Submission Plan)</li> </ul> <p>Consultation results reported to and considered by Cambridge:</p> <ul style="list-style-type: none"> <li>• Development Plan Scrutiny Sub Committee:29 May 2013</li> <li>• Environment Scrutiny Committee 11 June 2013</li> <li>• Council 27 June 2013</li> </ul> <p>Consultation results reported to and considered by Joint Meeting</p> <ul style="list-style-type: none"> <li>• Joint Strategic Transport and Spatial Planning Group - 22 May 2013</li> </ul>
<p>21. June 2016: Playing Pitch Strategy 2015-2031 (RD/CSF/190) and Indoor Sports Facility Strategy 2015-2031 (RD/CSF/200) published jointly by CCC/SCDC. Neither brief appears to have referred to/requested an assessment of the need for/potential location of a community stadium: see RD/CSF/190 Ch 1 pp.47-49, esp para 1.7; RD/CSF/200 Ch 2 pp.47-48. The objector believes that CUFC were not consulted on either document. Neither of them includes any</p>	<p>The Councils commissioned the PPS and ISFS to identify needs for and to guide future provision and management of, sports pitches, built facilities and community use services to serve existing and new communities in the City and South Cambridgeshire. In line with the Government's National Planning Policy Framework, the strategies set out to assess existing built facilities, the future need for sport and active recreation, as the region grows and develops for opportunities</p>

<p>reference to a community stadium.</p>	<p>for new provision, and expansions of existing facilities.</p> <p>The key contextual factors for both Cambridge and South Cambridgeshire are:</p> <ul style="list-style-type: none"><li>• The requirements of the 2012 NPPF and specifically paragraphs 73 and 74</li><li>• The need to address planned population growth in each area and the sub-region as a whole</li><li>• The growing focus on improving health and well-being at national level, as a result of identified and increasing levels of obesity and inactivity, and the need to plan opportunities for more active lifestyles (sport and physical activity) into new and existing communities</li><li>• The new Government Sports Strategy which prioritises both informal and formal participation opportunities and the need to provide participation opportunities for both</li><li>• The new Sport England Strategy which identifies the need for increased participation and recreational opportunities, and therefore the need to invest in both formal and informal facilities</li><li>• The fact that both Cambridge and South Cambridgeshire District are generally affluent areas (although there are very specific areas of deprivation e.g. north and east of Cambridge, and in other areas of higher urban density), and therefore communities are more likely to participate in sport and physical activity, which results in high demand for provision of facilities</li><li>• The growing interest and large scale participation in recreational activities such as, cycling, running and walking</li><li>• The priority to increase participation levels areas of deprivation to contribute to improved community health, and reduce known health inequalities.</li></ul> <p>The strategies did not establish that there was a need for a community stadium. Both strategy documents provide clear, deliverable strategies for providing the necessary sports investment over the Plan</p>
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	<p>period. Both strategies have been developed in accordance with Sport England’s methodology which has involved significant consultation with pitch/facility providers and users as well as the relevant National Governing Bodies. Sport England and the Sports Governing Bodies were on the Steering Group for the studies (see PPS paragraph 1.21). The strategies provide an action list of where new provision should be provided on-site and how off-site contributions should be used to support new and improved provision.</p> <p>Cambridge United Football Club was not consulted directly on the strategies as consultation was carried out primarily with the governing bodies for relevant sports, including the Football Association.</p>
<p>22. 2 June 2016: PPS and ISFS reported to CCC Development Plan Scrutiny Sub Committee.  Resolved that Strategies be endorsed as part of evidence base for CLP, and that “any subsequent minor amendments and editing changes are made in consultation with” nominated councillors.</p>	<p>It is correct that the PPS and ISFS were both reported on 2 June 2016 to Cambridge’s Development Plan Scrutiny Sub Committee. They were both endorsed as a material consideration in decision-making and as part of the technical evidence base for the Local Plan with immediate effect. The second recommendation for each strategy agreed that any minor amendments and editing changes are made in consultation with the Executive Councillor for Planning Policy and Transport, the Chair, and Spokesperson of Development Plan Scrutiny Sub-Committee.</p> <p>These minor amendments and editing changes relate to the PPS and ISFS, not the Local Plan. This is a standard approach and addresses any proofreading issues, such as the need to amend site numbers or names after the strategy has been endorsed by the Executive Councillor for Planning Policy and Transport.</p> <p>Any modifications made to the emerging Local Plan need to follow the delegation process agreed by Full Council on 13 February 2014 that, in the interests of expediency, delegated authority be given to the Head of Planning Services to undertake appropriate negotiations and make further minor additions to the Schedule of Proposed Changes during the examination of the local plan (i.e. post ‘submission’) if in the</p>

	<p>opinion of the Head of Planning Services it is appropriate and necessary to do so to facilitate the smooth running of the plan through the examination period, (except where changes would be of such significance as to substantially alter the meaning of a policy or allocation). The exercise of this delegation to be reported back to Development Plan Scrutiny Sub-Committee through the course of the examination process. Main modifications have been reported as part of the Proposed Modifications consultation in Winter 2015 and further main modifications will be reported to committee prior to public consultation in due course. The Inspector has previously advised the Councils during hearing sessions that she would prefer to hold only one further round of public consultation. No further public consultation on modifications has yet been timetabled.</p>
<p>23. 7 June 2016: PPS and ISFS reported to SCDC Planning Portfolio Holder. Resolved to endorse the Strategies and give delegated authority to the Director of Planning “to make any subsequent minor amendments and editing changes, in consultation with the Planning Portfolio Holder”.</p>	<p>It is correct that the PPS and ISFS were both reported on 7 June 2016 to South Cambridgeshire’s Planning Portfolio Holder meeting. They were both endorsed as a material consideration in decision-making and as part of the technical evidence base for the Local Plan with immediate effect. The second recommendation for each strategy agreed that any minor amendments and editing changes are delegated to the Director of Planning and New Communities in consultation with the Planning Portfolio Holder.</p> <p>These minor amendments and editing changes relate to the PPS and ISFS, not the Local Plan. This is a standard approach and addresses any proofreading issues, such as the need to amend site numbers or names after the strategy has been endorsed by the Planning Portfolio Holder.</p> <p>Any modifications made to the emerging Local Plan need to follow the delegation process agreed by Full Council on 13 March 2014 which confirms that delegated authority be given to the Director of Planning and New Communities to make further additions to the schedules of changes during the course of the examination (except where changes would be of such significance as to substantially alter the meaning of a policy or allocation) and that the exercise of this delegation be</p>

	reported back to Planning Policy and Localism Portfolio Holder through the course of the examination process. Main modifications have been reported as part of the Proposed Modifications consultation in Winter 2015 and further main modifications will be reported to committee prior to public consultation in due course. The Inspector has previously advised the Councils during hearing sessions that she would prefer to hold only one further round of public consultation. No further public consultation on modifications has yet been timetabled.
24. 22 July 2016: planning applications submitted by Grosvenor/USS for Cambridge Sporting Village and Cambridge Community Stadium.	Planning application Cambridge City Council Reference 16/1376/OUT and South Cambridgeshire District Council Reference S/1925/16/OL for Land At M11, West Of Hauxton Road, Trumpington, Cambridge, Cambridgeshire and Cambridge City Council Reference 16/1375/OUT for Abbey Stadium, Newmarket Road, Cambridge, Cambridgeshire, CB5 8LL, were all validated on 22 July 2016.
25. 7 September 2016: at CC5 hearing session CCC propose modifications to remove references in CLP to community stadium (CC5/CCC – Supplement 1).	On 7 September 2016, the hearing session for Matter CC5: Services and Local Facilities was held. Cambridge City Council put forward modifications to paragraphs 8.11, 8.13 and 8.14 of the emerging Cambridge Local Plan. These modifications are contained in CC5/CCC – Supplement 1. One reference to ‘community stadium’ was removed from paragraph 8.14. References to ‘community stadium’ remain in paragraphs 2.56 and 8.13, whilst a ‘community sports stadium’ is referred to in Policy 73: Community, sports and leisure facilities.

## Summary

<b>Grosvenor/Wrenbridge’s comments</b>	<b>Councils’ comments</b>
26. 2005 Strategy identified Community Stadium as a “Sub-Regional Priority”.	The Cambridgeshire Horizon’s strategy “A Major Sports Facilities Strategy for the Cambridgeshire Sub-Region” (RD/CSF/010) was published in 2006. A Community Football Stadium was identified as a sub-regional priority (Page 3). Matters have however moved on since the Cambridge Horizon’s document was published, including through the completion of the PPS and ISFS.

<p>27. 2008 Feasibility Study shortlisted 3 sites and made recommendations for further action.</p>	<p>Cambridgeshire Horizons commissioned PMP to undertake the Cambridge Community Stadium: Feasibility Study (RD/CSF/030). This was published in April 2008. Three sites were shortlisted: Milton adjacent to the A10/A14, Cambridge East, and Cowley Road (Cambridge Northern Fringe East). The report provides recommendations for taking the community stadium development forward under the following headings:</p> <ul style="list-style-type: none"> <li>• confirm ownership of the scheme;</li> <li>• confirm a vision and key objectives for the scheme;</li> <li>• engage club partners;</li> <li>• use refined objectives to prioritise sites;</li> <li>• • stimulate political will for the scheme.</li> </ul>
<p>28. July 2012: strong support for need for community stadium (80%).</p>	<p>Cambridge Local Plan – Towards 2031: Issues and Options Report (RD/LP/240) included Questions 11.42 – 11.51 and option 179 on the community stadium. All of the responses to this section of the Issues and Options Report were provided as key issues to Option 179. Key issues for Option 179 can be found in Appendix A to the report on Key Issues arising from Issues and Options consultation to Development Plan Scrutiny Sub-Committee on 16 October 2012 (RD/CR/290) or in the audit trail for Policy 73: Community and Leisure Facilities in the Statement of Consultation and Audit Trails (RD/Sub/C/080).</p> <p>The South Cambridgeshire Issues and Options Report (RD/LP/030) referred to the Grosvenor proposal at paragraph 111.15 and the community stadium was addressed in Issue 84: Community Stadium and Question 84 (a &amp; b) in terms of need for a community stadium, the type and size of facility required and the appropriate location. RD/LP/030 has the following figures:</p> <p>Question 84:</p> <p>A. Is there a need for a community stadium? (Support: 117, Object: 13, Comment: 16)</p> <p>B. If there is a need, what type and size of facility should it be, and where is the most appropriate location? (Support: 75, Object: 19, Comment: 19)</p>

<p>29. Jan 2013 Review of Evidence and Site Options: longer list of potential sites (including Abbey Stadium and Trumpington) but need to be tested through further public consultation.</p>	<p>Issues &amp; Options 2 Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge (RD/LP/150) was subject to public consultation in January and February 2013. Chapter 10 of the Issues and Options 2: Part 1 document addresses sub-regional sporting, cultural and community facilities.</p>
<p>30. Jan 2013 Consultation doc Ch 10: public consultation undertaken (Jan-Feb) including questions about need, principles, GB release and specific site options.</p>	<p>Issues &amp; Options 2 Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge (RD/LP/150) was subject to public consultation in January and February 2013. Chapter 10 of the Issues and Options 2: Part 1 document addresses sub-regional sporting, cultural and community facilities.</p>
<p>31. Sometime between Feb and June 2013: results of consultation exercise. Strong support for need for a community stadium (67%), the principles set out in the Conson doc (85%), exceptional circumstances for GB review (78%), and for a site to be identified (75%). Trumpington most favoured of site options in terms of support vs opposition.</p>	<p>As point 19 and 20 above.</p>
<p>32. July 2013: both Local Plans published with references to community stadium.</p>	<p>Noted.</p>
<p>33. June 2016: Playing Pitch and Indoor Sports Facilities Strategies published. Briefs did not include consideration/review of need for/location of community stadium; therefore, wholly unsurprisingly, neither document makes any reference at all to this.</p>	<p>The Councils commissioned the PPS and ISFS to guide future provision and management of sports pitches, built facilities and community use services to serve existing and new communities in the City and South Cambridgeshire. In line with the Government's National Planning Policy Framework, the strategies set out to assess existing built facilities, the future need for sport and active recreation, as the region grows and develops for opportunities for new provision, and expansions of existing facilities.</p> <p>The key contextual factors for both Cambridge and South Cambridgeshire are:</p> <ul style="list-style-type: none"> <li>• The requirements of the 2012 NPPF and specifically paragraphs 73 and 74</li> <li>• The need to address planned population growth in each area and the sub-region as a whole</li> </ul>

	<ul style="list-style-type: none"> <li>• The growing focus on improving health and well-being at national level, as a result of identified and increasing levels of obesity and inactivity, and the need to plan opportunities for more active lifestyles (sport and physical activity) into new and existing communities</li> <li>• The new Government Sports Strategy which prioritises both informal and formal participation opportunities and the need to provide participation opportunities for both</li> <li>• The new Sport England Strategy which identifies the need for increased participation and recreational opportunities, and therefore the need to invest in both formal and informal facilities</li> <li>• The fact that both Cambridge and South Cambridgeshire District are generally affluent areas (although there are very specific areas of deprivation e.g. north and east of Cambridge, and in other areas of higher urban density), and therefore communities are more likely to participate in sport and physical activity, which results in high demand for provision of facilities</li> <li>• The growing interest and large scale participation in recreational activities such as, cycling, running and walking</li> <li>• The priority to increase participation levels areas of deprivation to contribute to improved community health, and reduce known health inequalities.</li> </ul> <p>The strategies did not establish that there was a need for a community stadium. Both strategy documents provide clear, deliverable strategies for providing the necessary sports investment over the Plan period. Both strategies have been developed in accordance with Sport England’s methodology which has involved significant consultation with pitch/facility providers and users as well as the relevant National Governing Bodies. The strategies provide an action list of where new provision should be provided on-site and how off-site contributions should be used to support new and improved provision.</p>
34. June 2016: both Councils endorse the Strategies. Reports (again	It is correct that the PPS and ISFS were both reported on 2 June 2016

<p>unsurprisingly) don't mention community stadium.</p>	<p>to Cambridge's Development Plan Scrutiny Sub Committee and on 7 June 2016 to South Cambridgeshire's Planning Portfolio Holder meeting. They were both endorsed by both Councils as a material consideration in decision-making and as part of the technical evidence base for the Local Plan with immediate effect.</p> <p>The strategies did not establish that there was a need for a community stadium.</p>
<p>35. July 2016: planning applications made for CSV/CCS.</p>	<p>Planning application Cambridge City Council Reference 16/1376/OUT and South Cambridgeshire District Council Reference S/1925/16/OL for Land At M11, West Of Hauxton Road, Trumpington, Cambridge, Cambridgeshire and Cambridge City Council Reference 16/1375/OUT for Abbey Stadium, Newmarket Road, Cambridge, Cambridgeshire, CB5 8LL, were all validated on 22 July 2016.</p>
<p>36. September 2016: modifications proposed to CLP (and SCLP: SC8/SCDC p.13-20) the effect of which would be to weaken the case for a community stadium in the area.</p>	<p>On 7 September 2016, the hearing session for Matter CC5: Services and Local Facilities was held. Cambridge City Council put forward modifications to paragraphs 8.11, 8.13 and 8.14 of the emerging Cambridge Local Plan to reflect the findings of the PPS and ISFS. These modifications are contained in CC5/CCC – Supplement 1. One reference to 'community stadium' was removed from paragraph 8.14. References to 'community stadium' remain in paragraphs 2.56 and 8.13, whilst a 'community sports stadium' is referred to in Policy 73: Community, sports and leisure facilities.</p> <p>On 9 November 2016, the hearing session for Matter SC8: Promoting Successful Communities was held. South Cambridgeshire District Council put forward a modification in the Council's hearing statement (Appendix 3) to reflect the findings of the PPS and ISFS. The modification is proposed to paragraph 9.17 as follows:</p> <p>"On the evidence available and the results of public consultation, the two Councils were not convinced that a compelling case exists amounting to the exceptional circumstances necessary in national planning policy for allocating a community stadium or other facilities in</p>

	<p>the Green Belt. This position has been confirmed through the Playing Pitch Strategy and the Indoor Sports Facilities Strategy which were completed in June 2016. Neither of these strategies identified a need for the level of additional provision which would be provided in the Greater Cambridge area by a sub-regional sports facility and/or a community stadium.”</p> <p>The Modifications proposed appropriately reflect the outcome of the studies.</p>
<p>37. Conclusion:</p> <p>(i) The proposed modifications do not “cater for the unexpected”; it is in fact the mods themselves that are unexpected. Para 5.20 of the PINS guidance is therefore contravened.</p>	<p>Cambridge City Council’s Policy 73: Community, sports and leisure facilities addresses proposals for a range of other sporting facilities within the emerging Cambridge Local Plan, while the South Cambridgeshire Local Plan addresses sports facilities through policies on major new developments and policy SC/4 requires new housing developments to include or contribute to provision of services and facilities necessary to meet the needs of the development, including sporting facilities. The strategies support the delivery of sport facilities for the populations of Cambridge and South Cambridgeshire.</p> <p>The PPS and ISFS have been prepared to accord with the NPPF para.73. The intention to commission these strategies has long been identified. The strategies are robust and since their conclusions only became apparent following submission of the plan those conclusions cannot have been expected. The modifications are made in order to reflect the full and up-to-date evidence base, including most recently the studies. They are necessary to make the plan sound; indeed the Plans cannot sensibly be considered to be “positively prepared, justified, effective and consistent with the NPPF” (as required by NPPF para.182) if they do not reflect the very strategies which the NPPF, at para.73, requires to be undertaken as part of policy making.</p>
<p>(ii) There is in any event no rational justification for the proposed</p>	<p>The Councils consider that these modifications are justified and relate</p>

<p>modifications.</p>	<p>to the production of the Playing Pitch Strategy and the Indoor Sports Facilities Strategy (RD/CSF/190 and RD/CSF/200). The modifications are necessary to secure soundness, as defined by the NPPF.</p>
<p>(iii) Up to the publication of the June 2016 Strategies previous studies, public consultation and the Submission Local Plans had all supported the provision of a community stadium to serve the sporting and leisure needs of the area, with the prospect of a suitable site being identified in due course but not necessarily in the Green Belt.</p>	<p>The reasons for the Proposed Modifications are detailed in the Council’s Matter SC/4 Statement paragraphs 87 to 95. For the Cambridge Local Plan the reasons are provided in CC5/CCC – Supplement 1.</p>
<p>(iv) The June 2016 Strategies are given by the Councils as the reason for the modifications, but in fact these do not address the matters concerning the provision of a community stadium that have been considered over a number of years in a number of documents and consultation exercises. They are in fact entirely silent on the subject. For these reasons they have no bearing on the question of whether a community stadium should be provided, and if so where.</p>	<p>The Councils commissioned the PPS and ISFS to guide future provision and management of sports pitches, built facilities and community use services to serve existing and new communities in the City and South Cambridgeshire. In line with the Government’s National Planning Policy Framework, the strategies set out to assess existing built facilities, the future need for sport and active recreation, as the region grows and develops for opportunities for new provision, and expansions of existing facilities.</p> <p>The key contextual factors for both Cambridge and South Cambridgeshire are:</p> <ul style="list-style-type: none"> <li>• The requirements of the 2012 NPPF and specifically paragraphs 73 and 74</li> <li>• The need to address planned population growth in each area and the sub-region as a whole</li> <li>• The growing focus on improving health and well-being at national level, as a result of identified and increasing levels of obesity and inactivity, and the need to plan opportunities for more active lifestyles (sport and physical activity) into new and existing communities</li> <li>• The new Government Sports Strategy which prioritises both informal and formal participation opportunities and the need to provide participation opportunities for both</li> <li>• The new Sport England Strategy which identifies the need for increased participation and recreational opportunities, and therefore</li> </ul>

	<p>the need to invest in both formal and informal facilities</p> <ul style="list-style-type: none"> <li>• The fact that both Cambridge and South Cambridgeshire District are generally affluent areas (although there are very specific areas of deprivation e.g. north and east of Cambridge, and in other areas of higher urban density), and therefore communities are more likely to participate in sport and physical activity, which results in high demand for provision of facilities</li> <li>• The growing interest and large scale participation in recreational activities such as, cycling, running and walking</li> <li>• The priority to increase participation levels areas of deprivation to contribute to improved community health, and reduce known health inequalities.</li> </ul> <p>The strategies did not establish that there was a need for a community stadium. Both strategy documents provide clear, deliverable strategies for providing the necessary sports investment over the Plan period. Both strategies have been developed in accordance with Sport England’s methodology which has involved significant consultation with pitch/facility providers and users as well as the relevant National Governing Bodies. The strategies provide an action list of where new provision should be provided on-site and how off-site contributions should be used to support new and improved provision.</p>
<p>(v) Both Councils endorsed the Strategies in early June and resolved that any “minor amendments and editing changes” could be picked up later. No suggestion that Strategies could have any significance for/bearing on this.</p>	<p>These minor amendments and editing changes relate to the PPS and ISFS, not the Local Plan. This is a standard approach and addresses any proofreading issues, such as the need to amend site numbers or names after the strategy has been endorsed by the Planning Portfolio Holder or Executive Councillor for Planning Policy and Transport.</p>
<p>(vi) Proposed modifications have been (rightly) treated by Insp as main not minor mods. Therefore unclear what authority the Councils have to promote the mods given the terms of the June resolutions.</p>	<p>Any modifications made to the emerging Local Plan need to follow the delegation process agreed by the respective Full Council meetings in February and March 2014 that, in the interests of expediency, delegated authority be given to the heads of service to undertake appropriate negotiations and make further minor additions to the Schedule of Proposed Changes during the examination of the local plan (i.e. post ‘submission’) if in the opinion of the heads of service it is appropriate and necessary to do so to facilitate the smooth running of</p>

	<p>the plan through the examination period, (except where changes would be of such significance as to substantially alter the meaning of a policy or allocation). The exercise of this delegation is being reported back to Development Plan Scrutiny Sub-Committee or Planning Portfolio Holder’s meeting through the course of the examination process. Main modifications have been reported as part of the Proposed Modifications consultation in Winter 2015 and further main modifications will be reported to committee prior to public consultation in due course. The Inspector has previously advised the Councils during hearing sessions that she would prefer to hold only one further round of public consultation. No further public consultation on modifications has yet been timetabled.</p>
<p>(vii) The modifications should not be allowed.</p>	<p>The Councils considers that the modifications are appropriate and reflect the findings of the PPS and the ISFS.</p>
<p>(viii) Furthermore, as there remains clear evidence of sub-regional need, and widespread support, for a community stadium, which would help to address sporting needs which have been consistently identified over many years, and in the light of NPPF para 70, policy SC/4 should make positive provision for meeting all of these needs on suitable sites.</p>	<p>Both the PPS and ISFS provide clear, deliverable strategies for providing the necessary sports investment over the Plan period. Both strategies have been developed in accordance with Sport England’s methodology which has involved significant consultation with pitch/facility providers and users as well as the relevant National Governing Bodies. The strategies provide an action list of where new provision should be provided on-site and how off-site contributions should be used to support new and improved provision. The proposed development risks undermining planned provision in other sustainable locations in Cambridge and South Cambridgeshire. It is the intention of the Councils to ensure that new settlements in South Cambridgeshire include a sufficient range of sports facilities to maximise their own sustainability and not put further pressure on existing and other planned facilities in Cambridge. The development of the Cambridge Sporting Village risks undermining the provision of other outdoor sports facilities planned in Greater Cambridge and the recent sports strategies adopted by both Councils. It should be noted that the Cambridge Sporting Village proposes a variable area of outdoor sports facilities to be determined in a later planning application. This unknown aspect could itself lead to proposed sports</p>

	<p>facilities elsewhere in the area not being brought forward until this uncertainty had been removed to avoid over-provision in facilities that may not be available for use by the community.</p> <p>It should be noted that representation 59764 / 59908 proposes a new allocation and supporting text rather than amending SC/4 or its supporting text.</p>
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