



## **South Cambridgeshire Local Development Framework Cambridge Southern Fringe Area Action Plan**

### **Sustainability Appraisal / Strategic Environmental Assessment Adoption Statement**

#### **Introduction**

South Cambridgeshire District Council adopted the Local Development Framework (LDF) Cambridge Southern Fringe Area Action Plan (AAP) on 21 February 2008.

This statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), which require a statement to be produced on adoption of a plan or programme, to detail:

1. How environmental considerations have been integrated into the plan or programme;
2. How the Environmental Report has been taken into account;
3. How opinions expressed through public consultation have been taken into account;
4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Planning Policy Statement 12 widens these considerations from environmental, to broader sustainability issues, so that this statement provides information on the wider sustainability appraisal process.

This statement examines each of these points in turn.

# 1. How sustainability considerations have been integrated into the plan

The LDF aims to improve the overall quality of life for residents of South Cambridgeshire in a way which will also benefit future generations. Taking a sustainable approach to economic, social and environmental issues is at the heart of the plan and will be closely related to the national strategy for sustainable development which has four objectives:

- Social progress which recognises the needs of everyone;
- Effective protection and enhancement of the environment;
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

## Policy Context

The national context is set out in Planning Policy Statements (the replacement to Planning Policy Guidance Notes), Circulars and other advice from Government. Whilst some of those national policies require local interpretation, a great number do not.

The regional context is set out in the Regional Planning Guidance for East Anglia (RPG6), which was approved in November 2000. It aims to focus a higher proportion of Cambridgeshire's growth into the Cambridge Sub-Region and proposes a sequential approach to the planning of development, with much of the development concentrated into and on the edge of Cambridge (subject to a review of the Cambridge Green Belt), including development in South Cambridgeshire, and into a new town beyond the outer boundary of the Green Belt.

RPG6 informs the strategy in the Cambridgeshire and Peterborough Structure Plan 2003. This will be the last of its kind and will be superseded by a new Regional Spatial Strategy for the East of England. Whilst under the terms of the new plan making system the LDF must be in general conformity with RPG6, in the circumstances of the Cambridge Area it is also appropriate and consistent for the LDF to meet the policy requirements of the Structure Plan, as there is currently no evidence that the draft RSS is proposing divergent emerging policies on the development strategy for the sub-region relative to those set out in the current RPG and the 2003 Structure Plan.

The East of England Regional Spatial Strategy (RSS) will replace the Cambridgeshire and Peterborough Structure Plan when it is published in its final form by the Secretary of State. A number of Structure Plan policies have been 'saved' under the transitional provisions of the Planning and Compulsory Purchase Act 2004.

## **Cambridge Southern Fringe Area Action Plan Policy Approach**

The Cambridge Southern Fringe AAP, in conjunction with the Development Control Policies DPD, sets out the principles that need to be taken into account in planning that part of the urban extension which lies within South Cambridgeshire so that the special qualities of the area remain, and to achieve an attractive, high quality sustainable place where people want to live, work and relax, as well as securing landscape, biodiversity and public access enhancements for the countryside adjoining development areas.

### *Vision and Development Principles*

The Vision and Development Principles chapter draws together the Vision for the creation of a sustainable vibrant new urban extension of Trumpington with a distinctive identity, and the issues that need to be considered in determining planning applications in order to achieve sustainable development. This includes a requirement for a Masterplan to ensure new development respects its surroundings and is built to a high quality of design, makes provision for all necessary infrastructure to serve the development and uses sustainable methods of construction. It also requires a Countryside Enhancement Strategy comprising landscape, biodiversity and public access enhancement.

### *Trumpington West and the Southern Setting of Cambridge*

The Trumpington West and the Southern Setting of Cambridge chapter details the extent of the site for Trumpington West, at the former Monsanto site. It details the revisions to the boundary of the Cambridge Green Belt to accommodate development. The chapter also sets out the requirements for enhancing landscape, biodiversity, recreation and public access in the Cambridge Southern Fringe, to mitigate the impact of development.

### *Trumpington West*

The Trumpington West chapter draws together all aspects concerning the built form of the new urban extension and the landscape treatment within and on the edge of the urban extension. It ensures a mix of uses will be available to cater for day-to-day needs of residents. The housing section includes requirements for a mix of house types to meet local needs, including affordable housing. Employment, community, leisure, recreation, arts and cultural facilities will be available to assist with the creation of a balanced community. The new urban extension will be situated close to the southern terminal of the Cambridgeshire Guided Busway to provide a high quality alternative to the car, and a network of walking and cycling routes will also provide sustainable choices. The urban extension will respect and enhance natural resources, biodiversity and historic resources, and will be an exemplar in sustainability, minimising the use of resources such as water and energy, whilst maximising opportunities for the use of sustainable energy sources.

## *Delivering The Cambridge Southern Fringe*

The Delivering The Cambridge Southern Fringe chapter deals with all aspects of the delivery of the urban extension, through sustainable construction methods and making use of existing buildings and resources on site, as well as the timing of service provision. The chapter draws together the planning obligations and conditions to secure a Countryside Enhancement Strategy, and to ensure the funding of services, facilities and infrastructure, including the longer term requirements for the management of services, facilities, landscape and infrastructure. The Cambridge Southern Fringe AAP also includes a series of indicators that will be monitored through the LDF Annual Monitoring Report. The impact of the plan can therefore be monitored.

## **2. How the Sustainability Appraisal had been taken into account**

The Sustainability Appraisal has contributed to plan development by providing an independent assessment of the sustainability of the Council's proposed options and policies as they were developed. It demonstrates that sustainability considerations have been incorporated into the development of the AAP from an early stage, and provides a formal statement and audit trail of the assessment.

The Sustainability Report is a key output of the plan preparation process. It reflected and supported the draft plan on which formal public consultation and participation was carried out. Appraisals of the Core Strategy DPD, Development Control Policies DPD, and Site Specific Policies DPD in combination and Northstowe and Cambridge East Area Action Plans were submitted in parallel, which had the advantage of providing an even greater level of detailed analysis of the impact of policies in the Cambridge Southern Fringe AAP.

The process began with preparation of the Sustainability Appraisal Scoping Report. This formed a useful part of the evidence base for the early stages of plan preparation. It provided information on other relevant plans and strategies, from European to local level, and analysed which objectives and requirements were relevant to the preparation of the South Cambridgeshire Local Development Framework.

The information gathered was used to create a set of sustainability objectives, which could be used to test emerging options and policies. A consistency matrix was used to test any tensions between these objectives. A set of indicators was also created, to provide evidence on the current state of the environment, as well as social and economic factors. These indicators were tested against other geographical areas to provide a comparison. This helped to identify priorities for South Cambridgeshire and any existing problems. It also highlighted policy issues that should be explored.

The key sustainability issues identified in the Scoping Report influenced the development of plan policies and objectives. Section 6.2, and Appendix 8, of the

Final Sustainability Report specifically analyses the impact of policies on these wider sustainability issues. The objectives of the draft plan were tested against the sustainability objectives, through the Initial Sustainability Report. This provided information to the Council and representors on the compatibility between plan objectives and sustainability objectives.

The significant effects of the options, and subsequent policies, were analysed against the sustainability objectives, which provided information on their economic, social and environmental impact. Analysis included the scale and nature of the impact, cumulative, secondary and synergistic impacts. Both detailed testing matrices, and written summaries were included in the Final Sustainability Appraisal Report. This provided useful information to both representors and the Inspectors on the impacts of the policies of the plan.

The analysis of the impacts of the plan proposals also indicated opportunities to improve the sustainability of the plan, and indicate mitigation measures. The measures envisaged to prevent, reduce and as fully as possible offset any significant effects on the environment, as well as social and economic objectives, are summarised in Appendix 5 of the Final Sustainability Report. A number of changes were made to plan options, and subsequently plan policies, as a result of the analysis in both the initial and the draft final, and the Final Sustainability Appraisal Reports.

### **3. How consultation taken into account (draft plan and the Environmental Report)**

In this statement the Council is required to detail how opinions expressed in response to consultation have been taken into account.

#### **Key Environmental Bodies**

The Strategic Environmental Assessment Directive requires that authorities referred to in Article 6 (3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the Environmental Report. In England, the key bodies are the Environment Agency, English Heritage, Natural England (formerly English Nature) and the Countryside Agency.

Consultation on a draft of the Sustainability Appraisal Scoping Report with these key bodies was carried out in June 2004. The consultation enabled these bodies to comment on the appropriateness of the objectives, indicators, baseline assessment and issues / problems. A report on the outcome of these consultations is included in Appendix 7 of the Scoping Report. The consultation resulted in a number of changes to the Scoping Report, including changes to the sustainability objectives and questions, new issues for the area being identified, new plans and strategies being analysed in the report, and revised and new monitoring indicators.

## **Public Participation**

The Strategic Environmental Assessment Directive requires early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying Environmental Report before the adoption of the plan or programme or its submission to the legislative procedure. The Council undertook a programme of public participation on the plan and its Sustainability Appraisal prior to submission to the Secretary of State. Full details can be found in the 'Statement of Statutory Bodies Consultation and Pre-Submission Public Participation (REGULATION 28 STATEMENT)', available to view on the Council's website.

## **Consultation under Regulation 25**

### *Statutory Bodies Consultation*

The Council carried out an initial consultation with statutory bodies on all the matters which would be covered by the DPDs, as required under the new system of plan making, to ensure that it was aware, at an early stage of any programmes and plans that would affect the LDF. This took place under the “jumping the gun” regulations, in the lead up to the new system of plan making which did not come into force until September 2004. The consultation took the form of a letter highlighting general issues relating to the proposed Development Plan Documents, and seeking comments on issues that should be considered. The responses received were taken into account in preparing the Preferred Options Reports. A summary of the main issues raised and how the issues were addressed can be found in Appendix 1.

### *Preferred Options*

Public consultation at this stage provided the public the opportunity to participate on options, before the decision was made on the preferred approach.

Initial Sustainability Appraisal Reports were included as annexes to the Preferred Options Reports. Whilst no representations were received specifically on the initial appraisal of the Cambridge Southern Fringe AAP, a total of 239 representations were submitted to the Cambridge Southern Fringe AAP. A summary of the main issues raised and how the issues were addressed can be found in Appendix 1.

A consultation draft Sustainability Appraisal Scoping Report was also included in the public participation at the Preferred Options stage of the LDF preparation. This also included consultation with a wide range of statutory bodies. The Preferred Options Reports were published in October 2004 and were subject to a six-week long public participation period. During this period, over 6,000 representations were received, 30 of which specifically related to the Scoping Report. A report on the outcome of the public participation is included in Appendix 8 of the Sustainability Appraisal Scoping Report. The consultation resulted in a number of changes to the scoping report, including changes to the sustainability objectives and questions, new issues for the

area being identified, new plans and strategies being analysed in the report, and revised and new monitoring indicators.

### **Consultation under Regulation 26**

The Pre-Submission Public Participation DPDs, together with the draft Final Sustainability Reports allowed the public to consider the Council's reasons for selecting their preferred options in the context of a compliant environmental report and to seek to persuade the Council to opt for another, different approach. A single set of proposals, in the form of the pre-submission DPDs, allowed consideration of a holistic view in the draft final Sustainability Report and for the assessment of cumulative and synergistic effects. It included an outline of the process of selecting and rejecting options.

2 representations were received in relation to the Cambridge Southern Fringe AAP appraisal. A further 260 representations specifically related to the Cambridge Southern Fringe AAP. A summary of the main issues raised and how the issues were addressed can be found in Appendix 1.

The Sustainability Appraisal Scoping Report was also subject to further public participation at the Pre-Submission Public Participation stage. 11 representations specifically related to the scoping report. A schedule of responses is included in the Sustainability Appraisal Scoping Report 2006. The majority of representations related to health issues. Changes were made prior to publication of the Sustainability Appraisal Scoping Report, alongside the Final Sustainability Appraisal. They include additional details from additional plans and strategies relating to health issues.

### **Submission**

On submission of the AAP, accompanied by the Final Sustainability Report, a further 118 representations were received, which were considered by independent Inspectors through the Examination process.

## **4. Reasons for choosing the document as adopted in light of other reasonable alternatives.**

The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) requires environmental reports to examine reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

This statement is required to set out the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.

PPS12 makes clear that full regard should be had to the chain of conformity to avoid duplication of assessment. RPG6 and the Cambridgeshire Structure Plan provide a

very clear strategy. This limited the number of available reasonable alternatives, as non-conformity with the clearly established strategy in a recently adopted higher order plan would make an alternative unreasonable. The Structure Plan was subject to Sustainability Appraisal.

The appraisal of alternatives is documented in the Final Sustainability Report. Appendix 2 of the report details the options selection process, and sets out why certain options were not considered reasonable. The preferred options reports included a number of options, each of which were appraised through the initial appraisal reports, to assist decision making of both the Council, and to inform representors. This process is also captured in Chapter 5 of the Final Sustainability Report. Sustainability Appraisal involves testing each reasonable plan option against the SA Framework to determine their performance in sustainability terms. The process is fully documented, including the reasons for eliminating options.

Following Examination of the DPD, the binding Inspectors' Report states that, ' The SA identifies policy alternatives and constraints affecting the generation of alternatives, such as government guidance. SA is required to do no more than assess reasonable options, an obligation which I consider has been fully fulfilled, and this test is met. I am satisfied that the changes which I recommend are either within the scope of the SA or have been subject to SA within the representations put to me.'

## **5. Monitoring**

The Environmental Assessment of Plans and Programmes Regulations 2004 requires authorities to set out the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Details of the monitoring measures envisaged are summarised in Appendix 6 of the Final Sustainability Report.

The indicators created in the Sustainability Appraisal Scoping Report, will continue to be monitored annually. They have been utilised as 'significant effect indicators', to be collated in the LDF Annual Monitoring Report. This report includes an analysis of the implications of the results, and should a need arise a review of LDF documents could be triggered by this information.

The South Cambridgeshire Annual Monitoring Report is available to view on the Council's website.

## **Appendix 1: Extract From 'Statement of Statutory Bodies Consultation and Pre-Submission Public Participation (REGULATION 28 STATEMENT)'**

### **7. Sustainability Appraisal Scoping Report**

#### **Statutory Bodies Consultation on Draft South Cambridgeshire Sustainability Appraisal Scoping Report**

- Consultation with statutory bodies took place in June 2004.
- Key agencies that have environmental, social or economic responsibilities (the Environment Agency, English Nature, English Heritage, and the Countryside Agency).
- All four bodies responded.
- A schedule of responses is included in the Sustainability Appraisal Scoping Report 2006, and is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).
- Summary of main issues raised: The consultation enabled these bodies to comment on the appropriateness of the objectives, indicators, baseline assessment and issues/problems. Additional Sustainability Objectives, decision making criteria, and monitoring indicators suggested. A number of local sustainability issues raised, including historic environments, water and drainage, and biodiversity.
- How were issues addressed: Changes were made prior to publication of the Consultation Draft Scoping Report. They include additional Sustainability Objectives, decision making criteria, and monitoring indicators.

#### **Consultation Draft South Cambridgeshire Sustainability Appraisal Scoping Report**

- Public consultation took place during a 6 week period from Friday 1 October 2004 to 12 noon on Friday 12 November 2004 (alongside Preferred Options Reports).
- 30 representations specifically related to the scoping report.
- A schedule of responses is included in the Sustainability Appraisal Scoping Report 2006, and is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).
- Summary of main issues raised: A wide variety of issues were raised, ranging from transport, landscape, to health.
- How were issues addressed: Changes were made prior to publication of the Sustainability Appraisal Scoping Report, alongside the Final Draft Sustainability Appraisal. They include additional Sustainability Objectives, decision making criteria, and monitoring indicators.

## **South Cambridgeshire Sustainability Appraisal Scoping Report**

As part of the Draft Final Sustainability Reports for the six Development Plan Documents, the Sustainability Appraisal Scoping Report was subject to further public participation at the Pre-Submission Public Participation stage.

- Consultation took place in a 6 week period from Friday 17 June 2005 to 12 noon on Friday 29 July 2005.
- 11 representations specifically related to the scoping report.
- A schedule of responses is included in the Sustainability Appraisal Scoping Report 2006, and is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).
- Summary of main issues raised: The majority of representations related to health issues.
- How were issues addressed: Changes were made prior to publication of the Sustainability Appraisal Scoping Report, alongside the Final Draft Sustainability Appraisal. They include additional details from additional plans and strategies relating to health issues.

## **8. Initial Sustainability Reports**

The Initial Sustainability Appraisal Reports were included as annexes to the Preferred Options Reports. Each option was subject to testing against the Sustainability Appraisal objectives created through the Scoping Report. The Initial Appraisal reports provided a summary of results, and provided valuable supporting information when considering options. Detailed background tables supporting the appraisal of each option are available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).

### **Cambridge Southern Fringe Area Action Plan**

No representations specifically related to the Initial Appraisal.

## **9. Draft Final Sustainability Reports**

The Draft Final Sustainability Reports meet the requirements for sustainability appraisal and strategic environmental assessment.

They were published for public participation alongside the Pre-Submission Public Participation Draft Development Plan Documents.

### **6. Cambridge Southern Fringe Area Action Plan**

- 2 representations were received.
- A schedule of responses is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).

- Summary of main issues raised: Issues Raised did not relate to the contents of the Final Sustainability Report
- How were issues addressed: No change.

## **6. Cambridge Southern Fringe Area Action Plan**

### **6.A Statutory Bodies Consultation**

- A total of 44 representations specifically related to the Cambridge Southern Fringe Area Action Plan.
- A schedule of responses is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).

#### **Summary of main issues raised:**

- The majority of the representations received were from Cambridgeshire County Council stating perceived requirements for the AAP, these include: infrastructure, amenities and protection for the landscape and wildlife.
- Concerns were raised regarding the impact of development on the Southern Fringe on traffic flows.
- Representations pointed out that the proposed Monsanto development had not been tested at the Structure Plan EIP.
- Unease at the effect on the environment and green belt of the development was also raised.

#### **How were issues addressed:**

- Issues raised were considered when the Preferred Options Reports were drafted.

### **6.B Preferred Options Report**

- A total of 239 representations were received.
- A schedule of representations, officers responses and recommended changes to plan is available to view on the District Council's website together with the minutes of the meeting recording the Council's decisions ([www.scambs.gov.uk](http://www.scambs.gov.uk)).

#### **Summary of main issues raised:**

A wide variety of representations were received. Some of the main themes of representations were:

- There was considerable support for the Vision for Cambridge Southern Fringe. The objective of creating a new high quality urban edge of Cambridge which provided a socially balanced community with a mix of house types,

sizes and tenures was generally supported as was the objective to integrate landscaped fingers of countryside into the development.

- The Preferred Options Report explored three approaches to development at Trumpington West: The Council's preferred option received the greatest support, although representations were submitted seeking amendments to the site boundary.
- The principle issues raised by the representations on drainage concerned the development land in Cambridge City at Addenbrooke's and Clay Farm/Royal Showground, including the drainage of the Addenbrooke's Link Road.
- There was general support for creating a 'sustainable drainage system' which will rely up natural drainage features which can be assimilated into the landscape.
- There were objections from the developers of land in Cambridge City at Addenbrooke's and Clay Farm/Royal Showground that they should not contribute to landscape, habitat and access improvements in the countryside in South Cambridgeshire which would adjoin their developments. There was support for the countryside improvement proposals, particularly from a number of local trusts who have expressed an interest in being involved in implementation and long term management.
- There was overall support for the requirement for high quality landscaping of road proposals, particularly the Addenbrooke's Link Road.
- Objections were raised to the requirement to agree a maintenance and management a strategy before planning permission is granted.
- Overall there was support for applying a single open space standard to the developments which cross the District boundary and that the City standard should apply as the vast majority of the development within the Cambridge Southern Fringe will be in Cambridge.
- There was significant support for the development of a strategy for creating a network of footpaths, cycleways and bridleways throughout the Cambridge Southern Fringe.
- On Biodiversity the representations overall (objection and support) sought to ensure that the existing biodiversity of the Cambridge Southern Fringe is enhanced as a result of development and the accompanying countryside improvements. In particular, the representations sought the encouragement of species which are native to (a) the chalkland approaches to Wandlebury and (b) the River Cam valley.
- On renewable energy, representation stated that targets were both too cautious and too ambitious.
- There was general support for the approach to implementation requiring developer contributions from developments in South Cambridgeshire as well as within Cambridge City.

#### **How were issues addressed:**

In the majority of cases the preferred approaches were developed into policies in the Pre Submission Public Participation Draft DPD. A significant number of changes to the approach to drafting the Pre-Submission Area Action Plan were agreed. They include:

- Amendments to site boundary.
- A requirement for a landscape strategy associated with the development at Addenbrooke's and Clay Farm/Royal Showground to require the developers to prepare the strategy for agreement by the Local Planning Authorities.
- Include reference to the findings of the "Strategic Open Space Study" jointly commissioned by the District Council's in Cambridgeshire and lead by the County Council.
- Includes reference to horse riding being accommodated within networks of new and existing public rights of way.
- Require a full ecological survey as part of the development.

### **6.C Pre-Submission Public Participation**

- A total of 260 representations were received. Of these, approaching 25% were in support.
- A schedule of representations, officers responses and recommended changes to plan is available to view on the District Council's website together with the minutes of the meeting recording the Council's decisions ([www.scambs.gov.uk](http://www.scambs.gov.uk)).

The majority of representations came from just a few organisations - principally Trumpington Meadows Land Company, Cambridgeshire County Council and the Government Office for the East of England who were seeking refinements rather than major changes to the Area Action Plan.

A wide variety of representations were received. Some of the main themes of representations were:

- The Area Action Plan is too detailed and too prescriptive.
- Trumpington West is not identified as a Green Belt release in the Cambridgeshire Structure Plan.
- Development should not be permitted to the south of the Park & Ride site.
- Development should be permitted in the green belt at north of Mingle Lane and at Cabbage Moor in Gt Shelford.
- The proposed County Park should include less land between the edge of development and the motorway.
- The development will not improve the quality of developed edge of Trumpington.
- There should not be any requirement for mitigating measures within South Cambridgeshire for development taking place in Cambridge City.
- The suggested threshold of 50% affordable housing is not reasonable.
- A 25% water conservation target lies outside the scope of the planning system.
- Include more details on implementation and monitoring of the AAP.

### **How were issues addressed:**

A number of changes were made for the Submission DPD, some of the more significant changes include:

- Amendment emphasising the need to link the Trumpington West development to the rest of Trumpington including Trumpington High Street.
- Clarifying that development must not detract from the character and setting of Cambridge.
- Added requirement that no dwellings at Trumpington West be occupied until the Addenbrooke's access road is completed.
- Added requirement that no construction traffic be permitted to access the site during peak hours to avoid exacerbating existing congestion on Hauxton Road.
- Removed requirement for 25% saving through water conservation measures.
- Revised scope of the energy conservation policy to delete aspects which GO-East advise are outside the scope of the planning system.
- Included reference to Strategic Open Space Standard.
- Added requirement for a strategic surface water drainage scheme
- New chapter on delivery of the AAP which sets out the mechanisms for implementing the AAP and includes a housing trajectory, a requirement of the new plan making system which forecasts delivery of the development
- New chapter on monitoring the AAP which highlights the importance of the plan, monitor and manage approach and sets out the indicators that will be used to monitor delivery of the Cambridge Southern Fringe.