

My ref: Planning Obligations SPD

Your ref:

Date: 24 January 2025
Contact: Colum Fitzsimons

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[REDACTED]

Planning Policy Team
Greater Cambridge Shared Planning Service

By email - local.plan@huntingdonshire.gov.uk

Frank Jordan,
Executive Director
Place and Sustainability
Planning and Sustainable Growth

New Shire Hall
Emery Crescent
Enterprise Campus
Alconbury Weald
PE28 4YE

Dear Sirs

Greater Cambridge Supplementary Planning Documents Consultation

- 1) Planning Obligations**
- 2) Health Impact Assessment**
- 3) Cambridge Biomedical Campus**

Consultation Response by Cambridgeshire County Council

I refer to the consultation on the above supplementary planning documents and thank GCSPS for affording the County Council the opportunity to comment.

Please find attached to this letter comments that I have received from services at the County Council. I trust that this will be of assistance to GCSPS in progressing the supplementary planning documents.

Please feel free to contact me if you wish to discuss this further.

Yours sincerely

[REDACTED]

Colum Fitzsimons
Development and Policy Manager
Planning, Growth and Environment

1) Planning Obligations Supplementary Planning Document: Response by Cambridgeshire County Council

Response By	Policy/section/paragraph	Response/Comment
Economy and Climate	General comment	<ul style="list-style-type: none"> It would be good to see climate change and carbon embedded throughout the chapters, as a reminder to developers that delivery of any planning obligations must adhere to the relevant policies in the Local Plans (such as Policy 28 & 29 from the Cambridge Local Plan, and Policy CC/1 and CC/3 from the South Cambridgeshire Local Plan).
	Chapter 19 - Planning Obligations to support local employment and skills – Paragraph 19.16	<ul style="list-style-type: none"> The penultimate bullet point could be strengthened with the mention of training and employment opportunities for green skills specifically, whilst retaining the good retrofitting example provided.
Connecting Cambridgeshire	General comment	<ul style="list-style-type: none"> The County Council welcomes that the SPD references digital connectivity in existing local plans, however stronger digital connectivity proposals, particularly around mobile connectivity could be implemented through the SPD.
Biodiversity and Greenspaces	General comment	<ul style="list-style-type: none"> We welcome the inclusion of biodiversity and public open space within this document, particularly the explanation of how planning obligations will be used to secure biodiversity net gain. The use of planning obligations to delivery public open space will be important for both health & wellbeing and reducing visitor pressures on existing wildlife sites.
Education	Chapter 11 – Education, paragraph 11.8	<ul style="list-style-type: none"> Drafting amendment required: <i>“The County Council will use its locally derived child yield multipliers to estimate child yield. These are adopted by the County Council Children’s Services Committee <u>Children & Young People’s Committee</u> and reviewed periodically to ensure they remain up to date and reflective of demographic and development trends. Whilst national data (adjusted) is available, this is considered less specific and does not take precedent.”</i>

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	Chapter 11 – Education, paragraph 11.9	<ul style="list-style-type: none"> <li data-bbox="902 260 2076 379">Drafting amendment required: <i>“Once the child yield is known has been estimated, this will be assessed against the school catchment capacities (not school rolls), taking into account other planned developments.....”</i>
	Chapter 11 – Education, paragraph 11.12	<ul style="list-style-type: none"> <li data-bbox="902 427 2076 563">Some short-term solutions may be needed to meeting demand for school places, particularly in smaller rural communities where expanding or building new schools is not feasible. Therefore the County Council supports the principle for securing contributions towards temporary accommodation and school transport and will prepare further guidance to support the SPD.

2) Health Impact Assessment Supplementary Planning Document: Response by Cambridgeshire County Council

Response By	Policy/section/paragraph	Response/Comment
Economy and Climate	Health Impact Assessment	<ul style="list-style-type: none"> The County Council agrees with the inclusion of 'Impacts of climate change on health' in section 3.13 of the Health Impact Statement.
Biodiversity and Greenspaces	General comment	<ul style="list-style-type: none"> We welcome the recognition of public open space and green infrastructure designed to improve public health within the Health Impact Assessment.
County Planning Minerals and Waste	Paragraph 3.13	<ul style="list-style-type: none"> Paragraph 3.13 lists matters that could be covered in a HIA. Most would not be relevant to mineral or waste sites where there are few employees and visitors (deliveries etc) and not publicly accessible, a very different situation to a housing, retail or leisure development.
County Planning Minerals and Waste	Paragraph 4.5/4.7	<ul style="list-style-type: none"> Paragraph 4.5 refers to "<i>Development proposals that include potentially hazardous uses or installations</i>" which would include some waste management facilities – for example Energy from Waste facilities. Paragraph 4.7 states, "<i>Only in exceptional circumstances where a developer can demonstrate that these HIA approaches would not be proportionate to a particular development context (even where the stated development thresholds are surpassed), and this is accepted by the LPA, will an alternative approach to policy requirements be considered acceptable.</i>" The County Council supports this level of discretion. Where relevant we require noise, AQ, odour, vibration & dust assessments and have asked waste developers to draw from these to inform a focussed HIA.

3) Biomedical Campus Supplementary Planning Document: Response by Cambridgeshire County Council

Response By	Policy/section/paragraph	Response/Comment
Economy and Climate	4e.1 - Climate	<ul style="list-style-type: none"> This section could be strengthened by the inclusion of a request to ensure the development is resilient to future climate risks such as increased frequency of extreme weather events.
	4e.2 – Design and construction	<ul style="list-style-type: none"> This follows good guidance using the net zero carbon toolkit’s energy hierarchy.
Lead Local Flood Authority	General Comment	<ul style="list-style-type: none"> While the SPD encourages the integration of open spaces and enhancing ecology and biodiversity which is supported by the LLFA, there is no mention of the incorporation of above ground Sustainable Drainage Systems (SuDS). It should be noted that as well as providing flood reduction benefits, SuDS can provide biodiversity, amenity, and water quality benefits. Therefore, the incorporation of SuDS directly contributes to the overarching themes and development principles of multi-purpose open space, ecology, and biodiversity, as well as climate resilience set out within the SPD. Encouraging well-designed SuDS that support biodiversity, amenity, and water quality aid the proposals of a more coherent approach ensuring that multi-functional open spaces embed biodiversity as part of the design whilst also providing flood reduction benefits.
	Policy 31 - Integrated water management and the water cycle	<ul style="list-style-type: none"> The LLFA are pleased to see the promotion of permeable surfaces as in addition to controlling the rate of surface water leaving the site it also provides water quality treatment. The LLFA is supportive of the promotion of rainwater harvesting systems which reduces existing stresses on potable water in Cambridgeshire.
	4e1.4 – Climate resilience and mitigation	<ul style="list-style-type: none"> The LLFA is supportive of the promotion of rainwater harvesting systems which reduces existing stresses on potable water in Cambridgeshire.
	4a - Open spaces and landscape, paragraph 4.10	<ul style="list-style-type: none"> The LLFA are pleased to see that consideration has also been given to Nine Wells local nature reserve as water quality of the chalk streams on this site are particularly important.
	4e – Sustainability, paragraph 4.22	<ul style="list-style-type: none"> The reference to the Cambridgeshire Flood and Water SPD is supported by the LLFA as it covers the importance of managing surface water runoff in new developments using sustainable

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		drainage systems. The LLFA would also encourage reference to Chapter 14 of the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG).
Biodiversity and Greenspaces	General Comment	<ul style="list-style-type: none"> We welcome the inclusion of ecology and biodiversity net gain, with specific reference to looking for opportunities to enhance tree cover and biodiversity at the Cambridge Biomedical Campus. However, we are surprised that a target of 20% Biodiversity Net Gain has not been including, particularly for phases that are yet to be built (e.g. Phase 3). Particularly given a 20% BNG aspiration is included within Greater Cambridge's Biodiversity SPD, and incorporated into Design Codes for other areas of the city (e.g. Draft Cambridge Neighbourhoods Design Code for Arbury, King's Hedges and parts of West Chesterton SPD).
Education	4b. Culture, services and facilities, paragraph 4b.3.2	<ul style="list-style-type: none"> Although elsewhere in the document, there is reference to existing nursery provision on campus, there is no reference to the need for additional nursery provision, which will be required as the campus grows.
County Planning Minerals and Waste	Chapter 3 – Site context, paragraph 3.1	<ul style="list-style-type: none"> Paragraph 3.1 should also refer to the Cambridgeshire and Peterborough Minerals and Waste Local Plan which also forms part of the development plan for the area.
	4e.3 – Environmental health considerations	<ul style="list-style-type: none"> The Waste Management Area for the Addenbrooke's incinerator (implemented but not built out) is within the Cambridge Local Plan site allocation M15 and is protected by a Consultation Area. There is a gap in their Map 3 of current occupiers that includes the site of the incinerator.? Para 3.28 of the SPD refers to the existing incinerator chimney in the context of building heights (78m and a 'distinctive landmark') but not the new one (60m). The SPD should also consider the environmental health impacts of the proposed 60m incinerator chimney.
	General comment	<ul style="list-style-type: none"> A safeguarded waste management site is located within the plan area for the Cambridge Biomedical Campus SPD. This is identified as "South west of Addenbrooke's Hospital, between Robinson Way and Addenbrooke's Road, Cambridge" Waste Management Area under Policy 16 of the Cambridge Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP). The safeguarded site is for the implemented planning permission for the Erection of an Energy Innovation Centre as part of the wider Biomedical Campus. Planning permission was granted in 2016 by Cambridgeshire County Council under planning reference C/05009/12/CW.

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		<p>It was subsequently implemented by the construction of the underground tunnel connecting to the Hospital to the new site.</p> <ul style="list-style-type: none">• The MWPA suggests that the Context section of the SPD (Chapter 3) is amended to include reference to the Minerals and Waste Local Plan (2021), the Energy Innovation Centre, and its safeguarded status within the MWLP.