

**RESPONSE TO THE
GREATER CAMBRIDGE
LOCAL PLAN ISSUES
AND OPTIONS
CONSULTATION 2020
STATION FIELDS, LAND
NORTH OF FOXTON**

Quality Assurance

Site name: Station Fields, Land north of Foxton, Cambridgeshire
Client name: Axis Land Partnerships
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Prepared by: Rebecca Smith MRTPI
Signed

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Reviewed by: Guy Kaddish
Signed

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1.0 Introduction

- 1.1 These representations are made on behalf of Axis Land Partnerships (“Axis”) in response to the Greater Cambridge Local Plan Issues and Options 2020 consultation.
- 1.2 Axis Land Partnerships is a land promotion and development company, with a proven track record of working collaboratively with landowners, the local community and key stakeholders to deliver new high-quality sustainable development.
- 1.3 Axis Land Partnerships are promoting ‘Station Fields, Land north of Foxton’ (“Station Fields”) for allocation as a new village community of circa 1500 homes, alongside a proposed new travel hub and level crossing bypass, employment land, community and recreational facilities, public open space, sustainable urban drainage, new habitats and structural landscaping, in the new Greater Cambridge Local Plan.
- 1.4 Station Fields lies outside the Cambridge Green Belt within a key transport corridor. It has direct access to Foxton train station, with the site identified as a new Rural Travel Hub location by the Greater Cambridge Partnership (GCP). The site also benefits from an existing public right of way system, which connects it to the surrounding villages and will be adjacent to the route of the proposed Melbourn Greenway. It represents a logical and sustainable location for growth for the new Local Plan.
- 1.5 The vision for Station Fields is:
- “to create a vibrant 21st Century rural community that integrates with its existing surroundings and provides enhanced and more plentiful local services and facilities with excellent transport links”*
- 1.6 Station Fields was submitted for consideration under the 2019 Call for Sites consultation. Axis are continuing to promote the Station Fields for allocation in the new Local Plan.
- 1.7 Further technical assessment and design work has been undertaken to develop the emerging proposals to ensure that they are suitable and deliverable. Further information is contained within the revised Vision Document prepared by Barton Willmore and should be read in conjunction with these representations. In addition, several supporting technical documents have been prepared and can be shared upon request.
- 1.8 To assist the Councils, the revised Vision Document demonstrates how new development at Station Fields has been influenced by, and more importantly, makes a positive contribution towards the Councils’ Big Themes: Climate Change; Biodiversity and Green Space; Wellbeing and Social Inclusion; and Great Places.
- 1.9 A replacement Call for Sites form accompanies these representations to reflect the change to the site boundary and the refinement of the development proposals. The Councils’ Question 2 is

answered in Section 2 of this report and provides an overview of the proposals for Station Fields along with key site-specific benefits with focus on the Councils' four Big Themes.

1.10 Section 3 of this report provides responses to the following questions in 'The First Conversation' Issues and Options 2020 consultation document:

- Question 2: Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan.
- Question 5. Do you think we have identified the right cross-boundary issues and initiatives that affect ourselves and neighbouring areas?
- Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?
- Question 6. Do you agree with the potential big themes for the Local Plan?
- Question 7. How do you think we should prioritise these big themes? Allocate 10 points across the following four themes:
- Question 8. How should the Local Plan help us achieve net zero carbon by 2050?
- Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?
- Question 12. How should the Local Plan help us improve the natural environment?
- Question 13. How do you think we should improve the green space network?
- Question 14. How do we achieve biodiversity net gain through new developments?
- Question 15. Do you agree that we should aim to increase tree cover across the area?
- Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?
- Question 18. How do you think we can make sure that we achieve socially inclusive communities when planning new development?
- Question 19. How do you think new developments should support healthy lifestyles?
- Question 20. How do you think we should achieve improvements in air quality?
- Question 21. How should the Local Plan protect our heritage and ensure new development is well-designed?
- Question 22. How do you think we should protect, enhance and adapt our historic buildings and landscapes?
- Question 23. How do you think we could ensure that new development is as well-designed as possible?
- Question 24. How important do you think continuing economic growth is for the next Local Plan?
- Question 25. What kind of business and industrial space do you think is most needed in the area?

- Question 28. In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?
- Question 29. How flexible should we be about the uses we allow in our city, town, district, local and village centres?
- Question 31. How should the Local Plan help to meet our needs for the amount and types of new homes?
- Question 32. Do you think we should provide for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?
- Question 33. What kind of housing do you think we should provide?
- Question 35. How should we ensure a high standard of housing is built in our area?
- Question 36. How should the Local Plan ensure the right infrastructure is provided in line with development?
- Question 37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?
- Question 38. What do you think the priorities are for new infrastructure?
- Question 42. Where should we site new development? Rank the options below 1-6 (1 Most Preferred 6-Least Preferred)
- Question 44. What do you think about developing around the edge of Cambridge on land outside the Green Belt?
- Question 46. What do you think about creating planned new settlements?
- Question 47. What do you think about growing our villages?
- Question 48. What do you think about siting development along transport corridors?

2.0 The Site

Question 2: Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan.

2.1 Axis Land Partnerships is promoting 'Station Fields, Land north of Foxton' ("Station Fields") for allocation as a new village community of circa 1,500 homes, alongside a proposed new travel hub and level crossing bypass, employment land, community and recreational facilities, public open space, sustainable urban drainage, new habitats and structural landscaping.

2.2 The vision for Station Fields is:

"to create a vibrant 21st Century rural community that integrates with its existing surroundings and provides enhanced and more plentiful local services and facilities with excellent transport links"

2.3 Station Fields was submitted for consideration under the 2019 Call for Sites consultation. Axis are continuing to promote the Station Fields for allocation in the new Local Plan. Further technical assessment and design work has been undertaken to develop the emerging proposals to ensure that they are suitable and deliverable. Further information is contained within the revised Vision Document prepared by Barton Willmore and should be read in conjunction with these representations.

2.4 A replacement Call for Site form accompanies these representations to reflect the change to the site boundary and the refinement of the development proposals. In addition, several supporting technical documents have been prepared and can be shared upon request.

A Logical Location

2.5 Station Fields is located six miles from Cambridge, outside the Green Belt. It benefits from existing and planned sustainable transport infrastructure; it is located next to Foxton Train Station and is the proposed location for a new Rural Travel Hub. It also benefits from an existing public rights of way network and will be located along the route of the proposed Melbourn Greenway. Not only will it promote sustainable travel into the centre of Cambridge, but it also has the potential to support the overall vitality and viability of the local rural area as part of a cluster of well-connected villages. It is a logical and sustainable location for growth. Further detail on the accessibility to sustainable transport infrastructure is provided below.

Key Public Transport Corridor

2.6 Station Fields lies at an interchange between rail, road and cycle/walking greenways. The site is centrally located between the villages of Foxton, Barrington and Shepreth on the A10, adjacent to Foxton railway station and the proposed Melbourn Greenway.

Foxton Train Station - Rural Travel Hub

- 2.7 Foxton Station is the first stop out of Cambridge with a journey time of just 6 mins. London Kings Cross station is a 1hr 14min journey on a direct train. From Foxton Station commuters can also connect with Royston, Letchworth Garden City, Hitchin and Stevenage all in under 30mins.
- 2.8 The Greater Cambridge Partnership (GCP) is promoting a 'Travel Hub' at Foxton Station to encourage more journeys into Cambridge by rail or cycle. They have, therefore, already identified that the site has very good non-car accessibility, particularly to Cambridge.

A10 level crossing

- 2.9 The proposed development presents a significant opportunity to deliver a solution for the Foxton level crossing issues – a number one safety issue of local residents as highlighted in their Neighbourhood Plan research and highlighted by the Greater Cambridge Partnership (GCP) as an issue that needs attention for the Strategic Highways Authority. Axis have had early-stage discussions with both GCP, Network Rail and Homes England about the deliverability of a bypass in this location and are open and supportive to ongoing engagement and discussions about a solution.

Melbourn Greenway

- 2.10 The Melbourn Greenway is a proposed route to enable cyclists, walkers and equestrians to travel sustainably from Melbourn into Cambridge. Its route passes close to Station Fields which could be incorporated into the Greenway offering an alternative route for new and current residents. There is potential to provide a well-positioned stop-off for users of the Greenway to provide convenience, refreshment and local services within the proposed Station Fields development.

Supporting Local Villages

- 2.11 The National Planning Policy Framework 2019 advocates the need for plans to help villages grow and thrive. It also recognises the role that villages can have in supporting each other.
- 2.12 Station Fields is an area of land entirely outside of the Cambridge Green Belt, with the potential to support the surrounding local villages of Foxton, Barrington and Shepreth by providing the range of facilities and services that residents would wish to see as well as for those who would call it home.
- 2.13 In the current South Cambridgeshire Local Plan the settlement hierarchy classifications of Foxton, Barrington and Shepreth means there is little scope for development and as such provision of any meaningful services to future- proof the villages for generations to come.
- 2.14 With its location in the centre of these 3 villages, Station Fields is perfectly located and connected to provide rural jobs, natural open space, housing and services that will complement the existing

communities of Foxton, Barrington and Shepreth , whilst protecting their individual identities and supporting them as attractive places to live for years to come.

- 2.15 The addition of a bypass, along with an improved travel hub and greenway would be a considerable improvement of connectivity locally and improve access to surrounding villages.

Non-Green Belt Location

- 2.16 Station Fields is not within the Cambridge Green Belt. The National Planning Policy Framework 2019 confirms that the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development prior to releasing land from the Green Belt for development (paragraph 137).

- 2.17 In summary, a new small-scale settlement where future residents have direct access to sustainable transport infrastructure, allowing them to walk, cycle and/or use the train station to access facilities and amenities in surrounding villages, Cambridge City Centre and other key employment and leisure destinations, provides a sustainable allocation for the new Local Plan.

Benefits of a new village

- 2.18 The National Planning Policy Framework 2019 recognises the role that new settlements can have in contributing to housing supply and bringing a greater scope of wider social, environmental, and economic benefits.

- 2.19 Paragraph 72 states that: *“the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements...provided they are well located and designed and supported by the necessary infrastructure and facilities.”*

- 2.20 Station Fields provides an excellent opportunity for a new comprehensively planned village supported by existing and planned sustainable transport infrastructure. Its scale allows for a mixed-use, socially inclusive community offering a greater range of homes, employment, health and recreational opportunities to be delivered. It also provides greater scope for environmental net gain both on and off-site.

Responding to the Big Themes

- 2.21 Station Fields location, along with the proposed scale of development, offers numerous opportunities to contribute towards the Councils’ four Big Themes. Further detail of how this can be achieved is provided within the accompanying Vision Document, with a summary provided in the table below:

BIG THEME	SITE-SPECIFIC CONTRIBUTIONS
Climate change	Mitigation:

BIG THEME	SITE-SPECIFIC CONTRIBUTIONS
	<ul style="list-style-type: none"> ● Offering new and existing residents a realistic alternative to private car use through creating a new 'Travel Hub' to accommodate local car clubs, electric charging points and bike parking; ● Locating employment opportunities, retail and community facilities, and attractive public spaces within a walkable neighbourhood that will discourage the need for private car use; ● Creating increased and enhanced pedestrian and cycle links to better connect the surrounding villages; ● Adapting to new technologies and sustainability standards – realising the opportunities facilitated by a larger scale of development; and ● Incorporating renewable energy and smart solutions to energy efficiency through the use of photovoltaics and micro renewables focused on community buildings, schools and employment areas where larger roof expanses aid greener solutions. ● Creating new areas of woodland planting to contribute towards carbon offsetting within the site – areas close to the watercourse, public open spaces and local village greens all provide the opportunity for significant tree planting; ● Providing opportunities for growing food, through allotments, orchards and edible landscaping; ● Providing large areas for Sustainable Urban Drainage through attenuation ponds that are able to more sustainably manage water run-off and storage
Biodiversity and Green Spaces	<ul style="list-style-type: none"> ● Provision of sports facilities, allotments, and children's play facilities, supporting healthy lifestyles; ● Promoting access to nature and the wider countryside, including the River Rhee County Wildlife Site, by returning arable land to its past use and opening up areas of natural grassland and wildflower meadows, taking advantage of the existing wildlife corridor along the watercourse ● Maximising the opportunity of the scale of development to achieve 10% biodiversity net gain on site without reliance on off-site mitigation; and ● Gathering spaces providing safe areas for social interaction with varied characters (contemporary / village green / naturalistic). ● A large area of the south west corner of the site is proposed for use as a 'Countryside Park'. This will preserve a generous buffer of public open space that will be sympathetically designed to reflect the broadly rural setting of the 'Roman site N of Brown Spinney' scheduled monument (1006873).
Wellbeing and Social Inclusion	<ul style="list-style-type: none"> ● Creating well-used and active public places that will help to foster a sense of community and reduce crime, including the 'Countryside

BIG THEME	SITE-SPECIFIC CONTRIBUTIONS
	<p>Park', sports provision, children's play areas, and streets and local greens.</p> <ul style="list-style-type: none"> ● Places that will offer natural sociability, interaction and neighbourliness; ● Capitalising on its proximity to Foxtton Station and the planned Melbourn Greenway, which will enhance the development's walking and cycling accessibility; ● Connecting the surrounding villages of Foxtton, Barrington, and Shepreth to the wealth of new facilities through the integration with existing walking, cycling and public transport networks and provision of plentiful new pedestrian and cycle links; ● Addressing issues of affordability by providing a variety of housing including self/custom build and being adaptable to changing needs of an ageing population; ● Providing easily accessible new employment opportunities that will contribute directly to local populations, including commercial spaces suitable for smaller start-up companies; ● Ensuring a high quality of public spaces, buildings, community events, virtual notice boards, seating, meeting places and active streets that people want to use; and ● Promoting physical activity and health through the creation of natural and recreational open spaces; ● Creating a Wellness centre within the mixed-use area of Station Fields that offers lifestyle courses, exercise classes and places to encourage mental wellbeing; ● Locating new homes, employment, community facilities close to public transport and within a walkable neighbourhood, encouraging access to existing and new facilities by all; ● Providing local grow spaces, community allotments and orchards that will help people get interested in healthy foods and diets with a central market square able to hold weekly food markets selling local produce; and ● Supporting the implementation of air quality action plans through the promotion of sustainable transport modes infrastructure to support electric vehicles.
Great Places	<ul style="list-style-type: none"> ● Preserve the historic and distinctive identities of Foxtton, Barrington, and Shepreth, by incorporating key characteristics of their vernacular and surrounding landscape; ● The Countryside Park will provide an opportunity for interpretation boards to improve public understanding and appreciation of the scheduled monument adjacent to the site.

BIG THEME	SITE-SPECIFIC CONTRIBUTIONS
	<ul style="list-style-type: none"> ● Capitalise on opportunities to use the intrinsic landscape positively in the design, including the retention of visual connections to Barrington All Saints Church and the creation of publicly accessible places in the setting of distinctive natural features such as the watercourse and trees; ● Safeguard local distinctiveness, whilst supporting the vibrancy and vitality of the existing communities through new complimentary facilities; ● Establish a truly connected and accessible place, providing clear and direct sustainable transport links between existing and new facilities; and

Deliverability

- 2.22 The development proposals for Station Fields meet the definition of deliverable as set out within the National Planning Policy Framework (2019).
- **Available** – the site is available now with agreement with all landowners.
 - **Suitable** – the site offers a suitable sustainable location for development now, benefitting from its location adjacent to Foxton train station and the A10 corridor.
 - **Achievable** – there is a realistic prospect that housing will be delivered on the site within five years of adoption of the plan.

Summary

- 2.23 In summary, Station Fields is located on a key public transport corridor; it benefits from access to Foxton Train Station, is the proposed location for a new Rural Travel Hub, has access to an existing PROW network and is along the route of the proposed Melbourn Cycleway. Therefore, future residents will not be reliant on use of private cars; they will be able to access both the City of Cambridge and its key employment and leisure locations, and also the surrounding villages, by walking, cycling and using bus and train services.
- 2.24 The proposed scale of development allows for a comprehensively planned new village, which can embed the Councils' four Big Themes in its design. The scale means that a large supply of a variety of new homes, jobs and community and recreational facilities can be delivered, along with a wider scope for environmental net gains.

3.0 About the plan

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?

Agree

- 3.1 Paragraph 22 of the National Planning Policy Framework 2019 (NPPF) states that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. The proposed plan period up to 2040 will meet this minimum requirement, subject to the plan being adopted by 2025; this should be closely monitored as the preparation of the plan progresses.
- 3.2 However, there are several national and regional strategic spatial strategies and policies e.g. the Combined Authority's Non-Statutory Spatial Strategy, the national requirement to achieve target net carbon zero by 2050 and the economic potential of the Cambridge-Oxford Arc, which look forward towards 2050 and will still be evolving during the course of the plan period. Therefore, the new Local Plan needs to build in sufficient flexibility to respond to these changes.
- 3.3 Moreover, it is imperative that the new Local Plan has flexibility to allow for additional growth to come forward to realise the potential of the economic corridors as they develop through cross boundary and national discussions, potentially within the early/mid stages of the plan period. Mechanisms, such as triggers for an early review of the Local Plan, should be explored.

Question 5. Do you think we have identified the right cross-boundary issues and initiatives that affect ourselves and neighbouring areas?

Agree

- 3.4 The new Local Plan needs to align with the national and regional strategic planning for the Greater Cambridge area and beyond. In particular, the new Local Plan must include a commitment to contribute towards harnessing the potential of the Cambridge – Oxford Arc for Greater Cambridge by delivering new homes, jobs and infrastructure in the right locations to support the wider growth agenda. It should also aim to support the Combined Authority's Non-Statutory Spatial Planning Growth strategy target of doubling economic outputs, over the next 25 years.
- 3.5 Paragraph 22 of the NPPF 2019 advises that strategic policies should anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. The draft strategic policies should set out clear strategic priorities for the area, including the important cross-boundary issues and how this are addressed. In addition, the new Local Plan will need to build in sufficient flexibility to respond to development in cross-boundary infrastructure.

3.6 Many of the cross-boundary issues are still evolving and each stage of the plan's preparation will need to respond accordingly. To achieve this, the Councils' must effectively collaborate with the Combined Authority, Greater Cambridge Partnership and the County Council to ensure that all strategic, cross-boundary matters are aligned, beyond the Councils' statutory duty to cooperate. We look forward to seeing statement of common grounds between all parties; these should be made publicly available throughout the plan-making process to provide transparency (as per paragraph 27 of the NPPF).

4.0 The Big Themes

- 4.1 **Question 6. Do you agree with the potential big themes for the Local Plan? Are there other themes or issues we should be considering that could inform our new vision for Greater Cambridge?**

Agree

- 4.1 Axis agree that the four big themes for the Local Plan are considered suitable and all are important in the consideration of the spatial distribution of growth in Greater Cambridge, and for the determination of planning applications.
- 4.2 The four big themes will generate a new way of planning, which may require a different way to make decisions. The Local Plan policy framework will need to allow for a clear planning balance to take place to assess and prioritise impacts. The need for homes and jobs remains as does the need to ensure development is viable and can come forward.

Question 7. How do you think we should prioritise these big themes?

- 4.3 The four big themes are all considered to be important aspects to achieving positive development. All four themes should be used to inform the spatial strategy within the Local Plan in terms of distributing growth and determining planning applications to deliver growth. It is therefore not considered necessary to rank the options in order of preference.

Theme 1 Climate Change

Question 8. How should the Local Plan help us achieve net zero carbon by 2050?

- 4.4 Axis supports the Councils' commitment to achieve net zero carbon by 2050. However, as climate change policy and best practice is changing quickly, with climate change scenarios predicting extensive changes by 2050, the new Local Plan will need to build in suitable flexibility to accommodate these changes within the plan period.
- 4.5 The new Local Plan will need to incorporate flexibly worded policies, which recognise that a range of on-site and off-site measures can contribute towards achieving net zero. It should avoid restrictive requirements and targets for meeting net zero carbon.
- 4.6 A needlessly stringent policy may inadvertently impede progress towards later years in the plan or undermine results by not allowing for site-specific refinement. For example, policy for electric vehicle charging points should be sufficiently flexible to accommodate that quickly changing technology, as well as the current grid challenges in implemented EV charging places. Energy policies should include flexibility for changing legislation, and technology, as well as the opportunity to refine a plan-wide policy for site specifics. As the Zero Carbon Futures Symposium Report (2019) submitted within the evidence base notes on page 10: where targets are too

limited, and without consideration of project contexts, policy can drive dysfunctional behaviour such as photovoltaic solar panels being installed on North facing roofs merely to achieve policy compliance not to produce effective carbon reductions.

- 4.7 If the new Local Plan is to achieve its ambitious targets on climate change the Council should consider new ways of achieving net zero. It should recognise that seeking to achieve net zero on all sites regardless of their site, location and site-specific factors may not be feasible. Linked initiatives such as an offsetting scheme, secured through S106 financial contributes, could be an appropriate way of achieving net zero.
- 4.8 If an offsetting scheme is the preferred mechanism, then the Councils' will need to set out a clear, appropriate and practical way to implement this, which will mean identifying strategic off-setting projects with Greater Cambridge, and potentially, beyond in collaboration with other key stakeholders. Any financial obligations towards an offsetting scheme will need to meet the statutory tests and considered in the context of viability.
- 4.9 The spatial growth strategy for the new Local Plan will have a significant role in achieving net zero carbon across Greater Cambridge. The aim to promote low-carbon lifestyles, encourage low carbon activities, and promote alternatives to private car use is supported. The spatial strategy should support this, with patterns of development that enable travel by low-carbon modes such as walking, cycling and public transport prioritised.
- 4.10 As part of a hybrid approach, the new Local Plan should recognise the role and scope that larger scale development, which builds upon existing sustainable transport infrastructure, can have in achieving net zero and support the allocation of these sites for development. Station Fields, which is being promoted by Axis, is located along a strategic public transport corridor. The scale of development offers opportunities for creating cost-effective and integrated solutions as part of an overarching climate change strategy.
- 4.11 We note that the Councils' have commissioned further work to test the options for higher standards of carbon reduction to understand potential to achieve net zero carbon in new development. This should be made publicly available as part of the Council's evidence base.
- 4.12 In addition, the Local Plan's Sustainability Appraisal (SA) should address variable climate change scenarios, as we would expect that different climate change scenarios as a lack of rigorous assessment of these scenarios in the SA could lead to the plan being found unsound.

Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?

- 4.13 Due to the anticipated rate of change in climate adaptation and mitigation measures over the plan period, a policy approach which allows for different solutions to be considered for each new development, as and when they come forward, is essential. This will allow for new or advancing technologies to be considered at the appropriate time.

Theme 2 Biodiversity and Green Spaces

Question 12. How should the Local Plan help us improve the natural environment?

- 4.14 This new Local Plan must deliver effective policy which protects and enhances natural capital. To achieve this, the new Local Plan should be flexible enough to enable creative and cost-effective solutions for the delivery of net gain both on and off-site.
- 4.15 An off-site net gain solution should be allowed for by policy. The Councils' should work collaboratively with other key stakeholders to develop a strategic offsetting mechanism to support this. This would allow for new green infrastructure and biodiversity habitats to be strategically planned. This has potential to provide a greater overall net gain, than the provision of small, uncoordinated and disconnected new habitats across a range of new developments and locations.
- 4.16 In addition, the Local Plan should recognise the scope that larger scale development/new settlements have in providing net gain in biodiversity through onsite and offsite provision, taking a more radical approach to the use of planning contributions in improving the natural environmental on the local and wider scale.
- 4.17 Overall, any future Local Plan policy must allow for a planning judgement and balanced decision to be made for each site taking into account development specific issues.

Question 13. How do you think we should improve the green space network?

- 4.18 This should come through from an up-to-date base assessment of Greater Cambridge assets, which leads to a Local Plan wide (and beyond) strategy. Development proposals can then be shaped around the identified priorities, as part of a policy framework that allows for off-site mitigation and off-site net gain enhancements which can be used to improve the wider green space network.

Question 14. How do we achieve biodiversity net gain through new developments?

- 4.19 The new Local Plan must ensure that policy in this matter is sufficiently flexible to accommodate the required biodiversity net gain in the most effective and efficient way for each development, with both on-site and off-site solutions possible.
- 4.20 The Council should develop a strategic offsetting mechanism. This would allow for new green infrastructure and biodiversity habitats to be strategically planned to provide greater benefit than the provision of small, uncoordinated and connected new habitats across a range of new developments.

Question 15. Do you agree that we should aim to increase tree cover across the area?

Agree

- 4.21 Axis support a policy framework to increase tree cover, but this must allow for a planning balance in decision-making to enable the benefits and impacts of each development to be assessed. This could be part of an on-site/off-site solution, which could generate notable s106 funds to achieve significant, meaningful and long-term planted and ecological areas. Ecological outcomes rather than an unconditional focus on native species should be considered in new planting.

Theme 3 Wellbeing and Social Inclusion

Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?

- 4.22 'Good growth' can be achieved by planning for new homes, jobs and communities in locations where residents have accessibility to high-quality public transport, new or existing health and community facilities and services, inviting public realms, green open spaces and a network of walking and cycling routes.
- 4.23 The new Local Plan should allocate sites which can deliver on these elements. For example, a new small-scale village settlement at Station Fields already benefits from being located adjacent to Foxtan train station, the proposed Melbourn Greenway and an existing public right of way system which links into the surrounding villages. Furthermore, due to the size of the proposed development, there is greater scope to provide additional facilities and design features to promote wellbeing and social inclusion.
- 4.24 The new Local Plan should include policies to promote wellbeing and social inclusion. A clear, easy to use and implemented framework would be welcomed. Policies and guidance should reflect changing best practice and acknowledge the role of viability so that it does not constrain the delivery of housing and jobs.

Question 18. How do you think we can make sure that we achieve socially inclusive communities when planning new development?

- 4.25 New development should include a range of new homes and associated infrastructure which can be accessed and enjoyed by all groups in society.
- 4.26 To achieve this, the Local Plan should include policies which allow for innovative ways to deliver 'affordable housing' across a range of tenure types. It should include a clearer policy framework to support housing for elderly persons.
- 4.27 New developments of scale can be comprehensively planned to provide a range of different types of housing to suit specialist housing needs. For example, new development, such as that proposed at Station Fields can provide a socially inclusive community by:-
- Creating well-used and active public places that will help to foster a sense of community and reduce crime, including the 'Countryside Park', sports provision, children's play areas, and streets and local greens. Places that will offer natural sociability, interaction and neighbourliness;

- Addressing issues of affordability by providing a variety of housing including self/custom build and being adaptable to changing needs of an ageing population;
- Ensuring a high quality of public spaces, buildings, community events, virtual notice boards, seating, meeting places and active streets that people want to use.

Question 19. How do you think new developments should support healthy lifestyles?

- 4.28 Paragraph 91 of the NPPF seeks to deliver healthy, inclusive and safe places, and identifies a number of approaches to support healthy lifestyles. It promotes social interaction through mixed-use developments, strong neighbourhood centres, street layouts that include pedestrian and cycle connections, and active street frontages for example. It enables and supports healthy lifestyles, by providing green infrastructure, sports facilities, local shops, access to healthier food, allotments, and layouts that encourage walking and cycling.
- 4.29 NHS England Healthy Towns Initiatives identified ten principles to deliver healthy places, which relate to the provision of health services, meeting local and community health needs, and development design matters. In terms of design matters it is suggested that compact neighbourhoods, active travel, healthy eating opportunities, play and leisure facilities would contribute towards the delivery of healthy.
- 4.30 The location of new development can support healthy lifestyles by providing new homes and jobs which are well connected spaces where people do not have to rely on the private car for their daily routine of school, work, shopping and leisure. Enabling active lifestyles and opportunities for social interaction should be a priority through:
- Creating different types of spaces within new developments, including areas which offer social interaction or tranquillity and/or access to nature.
 - Ensuring a range of shops and services, and facilities like allotments, that ensure communities can access healthy and affordable food.
 - Providing open space with integrate walking and cycling routes within developments where possible, alongside a policy framework to allow for off-site enhancements where appropriate, particularly when they can improve provision for existing communities.

Question 20. How do you think we should achieve improvements in air quality?

- 4.31 The NPPF recognises the role that the distribution of growth can have on air quality. It states that *“significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.”*
- 4.32 The Local Plan should allocate sites which limit the need to travel and offer a genuine choice of transport modes. A new village settlement at Station Fields which proposes a new Rural Travel Hub and new bypass of the level crossing on the A10 will improve air quality by reducing car emissions from stationary traffic waiting for long periods of time at the level crossing.

- 4.33 Reduce the use of vehicles by locating development where there is greatest access to active travel by employees, coupled with frequent, reliable and high-quality public transport options for those travelling from outside the city boundary.
- 4.34 Better cycle lanes, parking and cycle security achieved by developments directly and through a coordinated s106 infrastructure programme.

Theme 4 Great Places

Question 21. How should the Local Plan protect our heritage and ensure new development is well-designed?

- 4.35 Axis supports the need to protect and respond to the different landscape and townscape characters within Greater Cambridge. Axis believe that contemporary design and the historic environment can co-exist. Planning policies should therefore be flexible enough to allow for a design-led approach to bring forward innovative and creatively designed new spaces and places for both current and future generations to enjoy.

Jobs / Economy

Question 24. How important do you think continuing economic growth is for the next Local Plan?

Very important

- 4.36 The National Planning Policy Framework 2019 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (NPPF, paragraph 80).
- 4.37 Growth relies on increases in employment and productivity. The Cambridge and Peterborough Independent Economic Review (CPIER) emphasises the need for productivity growth in this region as employment rates are so high. Economic growth is therefore essential for the next Local Plan. As part of the devolution contract to Cambridgeshire and Peterborough is a commitment to doubling the economic output of the area (Gross Value Added) over 25 years; this ambition needs to be at the very heart of the Plan.
- 4.38 Cambridge's hi-technology clusters, particularly in AI, bio-tech and agri-tech are recognised in the UK Industrial Strategy as an essential element of the UK economy to support "...towns such as MK, Oxford and Cambridge (that) have been hot spots for job creation. We must promote growth through fostering clusters and connectivity across cities, towns and surrounding areas."
- 4.39 The new Local Plan should also support a prosperous rural economy and enhance the vitality and viability of the villages within Greater Cambridge which can be provided for by a new settlement at Station Fields.

Question 25. What kind of business and industrial space do you think is most needed in the area?

- 4.40 A wide variety of employment space in terms of location, size, function and price, is most needed in Greater Cambridge, to support the growth of the economy, offer choice to meet occupier's individual needs and strengthen opportunities for local supply chains to engage in the growth industries of the region.
- 4.41 There is a need to plan for flexible workspace and co-working hubs, providing shared facilities, which can adapt to fast-changing working practices.
- 4.42 The new Local Plan should therefore seek to allocate new employment land to provide local employment closer to home, diversify and enhance rural jobs, and help alleviate pressure for those who commute into the current employment hotspots.

Question 28. In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?

- 4.43 The UK industrial Strategy advocates focusing on our strengths, "*fostering clusters and connectivity across cities, towns and surrounding areas*". Sites which support these clusters are necessary and could be urban, edge of town or rural.
- 4.44 The new Local Plan should support a range of businesses located at South Cambridgeshire villages, in both small premises and business parks or industrial estates. These complement the employers based in or on the edge of Cambridge, or the large business parks in South Cambridgeshire.
- 4.45 The new Local Plan should allow for new business space, or flexible co-working space, in neighbourhoods or villages to help reduce the need to travel and support the net zero carbon aspirations.
- 4.46 Locations with high levels of public transport access should be identified for business uses. This would include sites within walking distance of train stations, travel hubs and along transport corridors.

"by ensuring good quality public transport is in place before development, the number of those new residents who will use the transport is maximised. This is also likely to be the best way to stretch some of the high-value businesses based within and around Cambridge out into wider Cambridgeshire and Peterborough. These companies will not want to be distant from the city, but these clusters could 'grow' out along the transportation links, providing connection to other market towns." CPIER p41

- 4.47 To enable growth of non-knowledge intensive companies, employment locations in settlements of all sizes and classification should be allocated or be permissible, with larger concentrations of

floorspace in areas with better public transport and access to active modes of travel. CPIER supports this position noting that deeper networks on smaller clusters on the periphery of Cambridge could help spread the 'Cambridge effect'.

- 4.48 Furthermore, all new employment space should be located and built to maximise the health and wellbeing of employees and visitors. Healthy buildings in locations that reduce commute times and improve the sleep and wellbeing of its occupants contribute significantly to their productivity. Improving productivity is a primary route through which the Greater Cambridgeshire economic expansion objectives of doubling GVA and inclusive growth will be achieved.

"If workers can be more productive, they can bring home more take home pay, which will flow into the local economy. And they will be able to enjoy a higher standard of life. It is this, before anything else, which needs to be looked at to create an inclusive economic future." CPIER p38

- 4.49 The new Local Plan should therefore seek to allocate new employment land to provide flexible workspace, local employment closer to home, provide diversity of rural jobs and alleviate pressure to commute into the current employment hotspots.
- 4.50 A new settlement at Station Fields has the ability to provide new local employment opportunities, but not only provide access to local jobs, but also to jobs within the city of Cambridge, Science Parks and Biomedical clusters.
- 4.51 Station Fields is also well-located to expand the cluster of businesses that prefer to co-locate with the IT, AI, biotech business at Cambridge Science Park and biomedical campus both of which would be easily accessible by train. It could play a dual role also as an untried and therefore relatively cheap location for businesses who don't need to be in the established cluster zone.

- 4.52 **Question 29. How flexible should we be about the uses we allow in our city, town, district, local and village centres?**

Very flexible

- 4.53 All uses of an appropriate scale could be included in every settlement. Mixed use site allocations (with restriction to prevent nuisance), are particularly appropriate in rural settlements to enable local commercial and retail businesses to grow organically.
- 4.54 it is important that residents of new developments have access to local services and facilities to meet their day-to-day needs.

Homes

- 4.55 **Question 31. How should the Local Plan help to meet our needs for the amount and types of new homes?**

- 4.56 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. It is important to identify a baseline housing need but there should be scope for further development to come forward if it meets a particular housing need. This would support the Government's objective of significantly boosting the supply of homes to ensure that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed (NPPF Para. 59).
- 4.57 The emerging GCLP will need to be consistent with national guidance on meeting housing needs. Paragraph 59 of the NPPF confirms the Government's objective to significantly boost the supply of housing, and to achieve this by ensuring that a sufficient amount and variety of land for housing is identified. Paragraph 60 expects the standard method to be used to determine the minimum number of houses needed. Paragraph 61 expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, students, renters and self-builders. Section Id.2a of the Planning Practice Guidance explains how housing and economic needs assessments should be undertaken, including how to calculate local housing needs using the standard method. Paragraph 010 of Id.2a makes it clear that the standard method is the minimum starting point for determining local housing needs and acknowledges that there may be circumstances where actual housing need is higher than the standard method indicates. As set out in Paragraph 010 the circumstances where increases to housing need that exceed past trends are as follows: there is a growth strategy in place to promote and facilitate additional growth; strategic infrastructure improvements are likely to lead to an increase in the number of homes needed locally; and, an authority has agreed to accommodate unmet housing needs from a neighbouring area. The first two circumstances are relevant to Greater Cambridge. Paragraph 024 of Id.2a explains how the need for affordable housing is calculated, and it is suggested that the overall housing target should be increased where it could help deliver the required number of affordable homes. There is an urgent need to improve the affordability of housing and to boost affordable housing delivery in Greater Cambridge.
- 4.58 Therefore, the emerging GCLP should use the standard method to calculate the minimum local housing need, and then make appropriate adjustments taking into account the growth strategies and strategic infrastructure improvements identified for Greater Cambridge, and a further adjustment to ensure affordable housing needs are met
- 4.59 The new Local Plan should recognise the role that larger scale development can have in providing greater scope to provide a greater range of housing types.

Question 32. Do you think we should provide for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?

Yes, strongly agree

- 4.60 The standard method for assessing local housing need provides a **minimum** starting point. As Paragraph 110 of the Planning Practice Guidance states there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

- 4.61 Greater Cambridge is an area with strong economic growth, with aspirations to maintain this growth. Axis support the Cambridge and Peterborough Independent Economic Review (CPIER) (September 2018) case for higher levels of housing growth within Greater Cambridge required to achieve the potential for employment growth over the next 20 years. As is widely recognised, the economy of Cambridge is too important locally, regionally and nationally for the Councils' to plan for the minimum number of homes required by the standard method.
- 4.62 In addition, there is a well-evidenced affordability problem in Greater Cambridge and a greater supply of homes will be part of the solution to tackle this issue. The Cambridgeshire and Peterborough Industrial Strategy 2019 makes this clear: "*Too many of the people working in Cambridge have commutes that are difficult, long and growing: not out of choice, but necessity due to high housing costs.*" [pg.13]
- 4.63 The increased demand for housing arising from the economic success of Cambridge also makes the area increasingly unaffordable. In addition, to being a concern to residents, affordability will impact upon the businesses looking to locate in the area. There is a danger that if there is an insufficient supply of housing the economic growth plans will not be realised. The role of housing in attracting and retaining skilled employees is widely recognised and should be adequately addressed in the new Local Plan.

Question 33. What kind of housing do you think we should provide?

- 4.64 Paragraph 61 of NPPF expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, older people, students, renters and self-builders.
- 4.65 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites. Separate housing needs assessments should be used to inform the appropriate size, type and tenure of housing needed for different sections of the community, as set out within the Greater Cambridge Housing Strategy 2019-2023. Flexibility will be key to a successful Local Plan; through market housing, low-cost and affordable housing.

Question 35. How should we ensure a high standard of housing is built in our area?

- 4.66 Local Plan policies can require a high standard of design for new residential development, leading from Government policy and guidance. Appropriately worded design policies should require a high-quality design for new dwellings. This could include sustainable design principles including measures to improve the energy efficiency of new homes, water saving measures, use of efficient insulation material and heating systems, the reduction and recycling of construction materials, provision of appropriate amenity space and accessibility. Policy should not be prescriptive for precisely how it will be accomplished, it can set a policy-level, but developers should be able to use a host of options to achieve the target.

Infrastructure

36. How should the Local Plan ensure the right infrastructure is provided in line with development?

- 4.67 The new Local Plan needs to be underpinned by an up-to-date robust evidence base on all types of local infrastructure (e.g. transport, schools, health and community facilities, open space) needs. The Councils' will need to work closely with key stakeholders to achieve this. The Councils' should prioritise infrastructure which promotes and supports growth in the right locations.

Question 37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?

- 4.68 The NPPF states that "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.*"
- 4.69 The NPPF also advocates the advantages of planning new settlements by: "*Considering opportunities provided by existing or planned transport improvements (such as public transport stops) when determining where future development should take place*", "*Assessing how potential development sites could provide new opportunities for transport infrastructure improvements*" and "*By locating new homes and jobs which have easy access to reliable sustainable transport modes.*"
- 4.70 The Local Plan needs to ensure developments create an environment where accessibility to day to day services and other facilities is easy and a choice of transport modes is available. This will enable the local community to choose the more socially inclusive and sustainable methods of travel. New developments need to be designed so that this can happen from first occupation when habits start to form.
- 4.71 Station Fields is an ideal example of an area that has opportunities to accommodate additional growth and encourage a shift away from car use and towards more sustainable modes of transport.

Question 38. What do you think the priorities are for new infrastructure?

- 4.72 New infrastructure should be prioritised in accordance with the future growth plans of Greater Cambridge.
- 4.73 It is considered that a bypass at Foxton level crossing should be a priority infrastructure project in order to promote future growth along the A10 corridor, to improve air quality, reduce congestion and improve safety of road and pedestrian users.

- 4.74 Travel hubs located at existing transport nodes should also be made a priority for new infrastructure projects. This promotes and encourages the use of public transport, reducing congestion and air quality issues on Cambridge City.

5.0 Where to Build?

Question 42. Where should we site new development?

- 5.1 Axis recognise that no single growth option will deliver a sound Local Plan; rather, a combination of approaches to the distribution of spatial growth will be necessary. Although, any hybrid approach should have a primary focus on accessibility to public transport, employment and other daily needs.
- 5.2 There is an opportunity to create new villages within or near key transport corridors, with sufficient scale to incorporate new community infrastructure with long lasting benefits for new and existing residents.
- 5.3 Station Fields is uniquely located within a cluster of existing villages. The Greater Cambridge Housing Strategy (2019) recognises the need to ensure that villages remain vibrant and sustainable, with homes built close to places of work, with good transport links and access to services and facilities. This aligns with the NPPF which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It goes on to promote planning policies that identify opportunities for villages to grow and thrive, especially where this will support local services.

Question 44. What do you think about developing around the edge of Cambridge on land outside the Green Belt?

- 5.4 As set out in paragraph 137 of the NPPF, the Councils' will need to demonstrate that it has fully examined all other reasonable options for meeting its identified need for development before amending Green Belt boundaries. This will be key in developing a sound Local Plan.
- 5.5 Opportunities to provide new homes and jobs on land outside of the Green Belt, but still within close proximity to Cambridge and along key public transport corridors should be fully assessed by the Councils.
- 5.6 A new settlement at Station Fields to the south west of Cambridge will also balance out the distribution of already planned growth. The current Local Plan trajectory places significant reliance on growth sites continuing their housing supply beyond 2031. However, these sites are skewed to the north of the district. Therefore, opportunities for new development to the west and south of Cambridge, especially those outside of the Green Belt, should be fully explored in order to spread the distribution of growth and promote equality and inclusivity throughout the Greater Cambridge area.

Question 46. What do you think about creating planned new settlements?

- 5.7 New settlements have an important role to play in achieving 'good growth' for the Greater Cambridge area. This is advocated in national planning policy, with paragraph 72 of the 2019 National Planning Policy Framework (NPPF) stating that:
- "the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities."*
- 5.8 It states that strategic policy-making authorities should identify suitable locations by considering the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains.
- 5.9 New settlements also offer the opportunity to comprehensively plan a new community achieving excellence in sustainable development and healthier living. New settlements can also provide new infrastructure, employment and services, a variety of homes to meet the needs of different groups in the community, and a greater scope to deliver a significant network of green infrastructure and biodiversity net gain on site.
- 5.10 In particular, smaller scale new settlements (circa 1000-2000 new homes) which can take advantage of and build upon existing sustainable transport infrastructure represent a sustainable growth option.
- 5.11 Some of these benefits are reflected in the Issues and Options Sustainability Appraisal December 2019 prepared by LUC on behalf of the Councils'. For example, it correctly acknowledges that Option 4 (Dispersal – New Settlements) provides *"an opportunity for significant new infrastructure to be delivered, such as schools, health facilities, local centres and green spaces"*.
- 5.12 Although, wrongly assumes that all new settlements mean *"starting from scratch. The creation of new settlements would also likely require supporting transport infrastructure that connected it to Cambridge, which would require large-scale investment and time to implement"* (paragraph 3.39).
- 5.13 Station Fields is on a key transport corridor and benefits from existing infrastructure due to its proximity to Foxton Rail Station, the A10 and the Melbourn Greenway.
- 5.14 Station Fields is appropriate in size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.

- 5.15 The scale of development of new villages also offers the opportunity to create a cluster of villages and bring benefits for the existing community and make a significant contribution to the long term development needs of the Cambridge area.

Question 48. What do you think about siting development along transport corridors?

- 5.16 Axis support the principle of siting new development along transport corridors, which encourages development to be focused on locations which limit the need to travel by private car and thus offer a genuine public transport alternative. Growth along these corridors will also support the expansion of economic benefits outwards from Cambridge.
- 5.17 Opportunities to locate new development along transport corridors on land outside of the Green Belt should be fully explored and assessed by the Councils in developing the spatial strategy for the new Local Plan.
- 5.18 New villages within or near to these transport corridors would direct growth to sustainable locations and create a sufficient scale of development to incorporate new community infrastructure with long lasting benefits for new and existing residents.
- 5.19 Station Fields is strategically located to take advantage of a key transport corridor, with existing and committed infrastructure to promote rail travel, walking and cycling into Cambridge and other destinations (Melbourn Greenway and Rural Transport Hub).
- 5.20 Station Fields is located along the route of the proposed Melbourn Greenway. This will offer new and existing residents the opportunity to cycle and walk into Cambridge and the surrounding villages and provide an attractive alternative to private car use. The proposals at Station Fields could facilitate an extension of the route to link up with new homes, jobs and community facilities and also offer an alternative to the carriageway route for less experienced cyclists.
- 5.21 In addition, the new Local Plan should consider the greater opportunities and benefits available for creating a Rural Travel Hub, which offers more than just surface car parking. Axis are open to working with the GCP to deliver a better solution for both users and the existing local communities.

6.0 Sustainability Appraisal

- 6.1 In reviewing the documentation prepared by the Council we recognise that this is an early stage in the plan's preparation and that an SA is an iterative process. At the outset we would note that recent challenges at examination of local plans have included substantive criticisms of the SA which goes well beyond the legal tests and into professional planning judgement. For example, examiners in the North Uttlesford Local Plan, North Essex Local Plan and St Albans Local Plan have recently requested information on alternatives that goes beyond the legal position of "reasonable alternatives" selected by the local authority using broad questions of judgement.
- 6.2 The Issues and Options Report is assessed in a SA report dated November 2019. The Issues and Options Report is largely of general content without spatial or specific focus, and consequently much of the assessment is general commentary.
- 6.3 Six spatially discernible options are provided in the "Towards a Spatial Plan" Section, which are:
- Option 1: Densification.
 - Option 2: Edge of Cambridge – Outside the Green Belt.
 - Option 3: Edge of Cambridge – Green Belt.
 - Option 4: Dispersal – new settlements.
 - Option 5: Dispersal – villages.
 - Option 6: Public transport corridors.
- 6.4 With only high-level options assessed at this stage, there is substantial uncertainty over the outcomes of these options. As such, the conclusions of the SA also are substantially uncertain, and more assessment is required with specific details provided on the deliverable projects which will make up these options.
- 6.5 There is a possibility that a preferred option will be advanced with an equally valid alternative discarded at this early stage due to lack of information. Additional assessment should take place at another local plan stage, with full assessments within the SA Framework, before any options are fully dismissed. Without a full consideration of all these options which considers substantive detail of deliverable sites, there is a risk of the plan's selected alternative not being properly justified, and the plan being found unsound at examination.
- 6.6 The options assessed in the issues and options report will likely only be achievable in combination with other options (e.g. some density within existing development, with some expansion to villages, etc). For transparency, the extent to which these options are likely to be combined in ultimate implementation should be made explicit in any future local plan documents which discuss these strategic options.
- 6.7 None of the options put forward in the Issues and Options Report are reasonable alternatives capable of meeting the objectives of the plan, as none of them is shown to be capable of meeting housing need and economic potential on their own. As none of the options are reasonable in

current form, they will need to be re-assessed at a subsequent stage when sufficient detail is available to robustly evidence the selection of a preferred option.

- 6.8 The significant negative or positive effects given within the SA report are at this stage based on the limited information available misleading due to assumptions used and uncertainty attendant with such high level options. The SA Report notes a large number of points of uncertainty, but still identifies a number of significant effects (both positive and negative). However, there are assumptions for the significant effects identified which aren't clearly explained and which can be questioned. For example, Option 5 (Dispersal – villages) is attributed a significant negative effect to SA Objective 6 (distinctiveness of landscapes) as it is assumed that expansion of these villages could have an adverse effect on the open countryside and landscape surrounding these villages, as well as village character. As recognised in paragraph 3.61 the actual effect will depend on the final design, scale and layout of the proposed development.
- 6.9 We recognise that SA is an iterative process which will evolve as a Local Plan progresses. More information should be provided on the approach to considering alternatives. The most substantive point we raise that this point is that the options set out in the Issues and Options Report should all be taken forward to subsequent local plan stages, where deliverable options should be assessed in detail, and transparent and objective assessment of these options provided at a subsequent SA stage. This will help ensure the Local Plan process and SA would support a hybrid of development scenarios which would underpin all development proposals at this stage.



BIDWELLS

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