

Part B – Your Response

Document details:	
<p>Which document are you commenting on? (please tick)</p>	<p><input type="checkbox"/> Greater Cambridge Local Plan Issues and Options 2020</p> <p><input checked="" type="checkbox"/> Sustainability Appraisal of Issues and Options</p> <p><input type="checkbox"/> Sustainability Appraisal Scoping Report</p> <p><input type="checkbox"/> Habitat Regulation Assessment Scoping Report</p>
<p>Question / Paragraph / Figure (Please state)</p>	<p>1.1</p>

Comments:

Please provide your response to the Issues and Options question, or views on the section of the other document you are commenting on. Where the question suggests options for the answers please start with indicating your choice (continue on separate A4 sheets(s) if necessary).

Please use a separate response form for each question you are responding to.

The Planning and Compulsory Purchase Act (2004) sets out that development plans (Local Plans) need to be accompanied by an appraisal of sustainability; the NPPG interprets this as SA and states that:

“Sustainability appraisal is integral to the preparation and development of a Local Plan, to identify how sustainable development is being addressed...”

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. To that end an approach which addresses both the legal requirements and current planning practice is advised.

It needs to be appreciated that there are two tests for local plan SA, the legal basis and the examination basis. A focus on both types of information, as well as legal minimums, should facilitate successful examination of the plan.

This early stage in the local plan processes provides the opportunity to set out the framework for a robust and meaningful SA which produces a local plan based on thorough assessment and consultation. Effort now in setting out a robust approach and consulting on it, will provide better results years later at examination. This type of detailed and careful SA goes beyond the legal minimums for SA, and provides the quality and forward thinking approach which aligns with the Councils' thought leadership on the key themes. This representation is intended to assist the local authorities in improving the quality of the SA, and the local plan.

With only high level options considered at this Issues and Options stage, there will be a lot of uncertainty on any outcomes of the options. Given the uncertainties outlined above about the spatial information for the options, the significant negative or positive effects given within the SA report are misleading due to assumptions used. While a larger number of points of uncertainty are noted in the SA, there are some assumptions for the significant effects identified which aren't clearly explained and which can easily be questioned. For example, in Section 6 "Towards a Spatial Plan" Option 6 (Development Along Transport

Corridors) is attributed a significant negative effect to SA Objective 6 (distinctiveness of landscapes) as it is assumed that development along the transport corridors will "string" along transport corridors (paragraph 3.62) in a type of sprawl. While there is noted to be uncertainty over this, it should be appreciated that this possible significant effect can be managed through standard policy mitigation and is not a reason to discount this as an option. These assumptions and uncertainties fundamentally undermine the significance determination provided now, which needs to be refined at additional local plan stages.

There is a tendency within SA practice to rely on assumptions and/or be overly positive about emerging preferences, leading to an unbalanced assessment that does not stand up to examination. At this early stage in the SA process we advise that a means of adding objectivity to the alternatives assessment is developed and consulted on. This could be developed by the SA consultants, and could be a sensitivity test of the methodology, double-assessment by two independent parties, or another means of adding objectivity and rigour within mixed methods research such as an SA.

Subsequent local plan stages

Whilst it is acknowledged that an SA is a working document which will evolve as a Local Plan progresses, more information should be provided at this early stage as to what the approach to considering alternatives will be according to the Local Development Scheme, and how the SA and the local authority intend to differentiate between the alternatives. This will provide proper justification of a selected spatial strategy, which is reasonable. Key points which should be addressed in the methodology include:

- How to ensure strategic options assessed are reasonable with the limited information available at this early stage.
- How site specific information will be considered within the options.
- How mitigation will be considered. While it is appreciated that the legal basis is for no mitigation to be considered to ensure all sites are considered on an equal basis, this is misleading there will be mitigation information available for some sites. A standardised approach to mitigation, allowing for the use of typical mitigation (SUDS, CEMPs, etc) and consulted on, would help with this.
 - Deliverability of major sites, including infrastructure assumptions
 - Built out rates (which reflect infrastructure assumptions).
 - Quantitative criteria to applied to various site sizes, such as number of new homes required for a primary and secondary school.

We advise that the high level options considered at this stage are refined through a detailed site-specific sifting process.

At the next stage the SA should set out an approach for assessing, and consulting on alternatives, over subsequent plan stages with increasing levels of detail. This will add robustness in the justification of the preferred alternatives.

Summary

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. To that end an approach which addresses both the legal requirements and current planning practice is advised.

This representation is intended to assist the local authorities in improving the quality of the SA, and the local plan.

Summary of Comments:

If your comments are longer than 100 words, please summarise the main issues raised.

Please see summary above.

Completed response forms must be received by 5pm on Monday 24 February 2020.

Email: Localplan@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team
c/o South Cambridgeshire District Council
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA