



South Cambridgeshire Local Development Framework

**Fen Drayton Former Land Settlement  
Association Estate**  
Supplementary Planning Document

**Statement of Consultation**

**May 2011**

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## **1. INTRODUCTION**

- 1.1 This statement has been developed to provide information relating to how the representations received to the Fen Drayton Former Land Settlement Association (LSA) Estate Supplementary Planning Document (SPD) have been considered in accordance with Town & Country Planning (Local Development) (England) Regulations 2004 - Regulation 18(4).
- 1.2 The SPD has not been subject to a full Sustainability Appraisal as the parent policies in the adopted Development Plan Documents have been fully appraised and it is not possible for an SPD to create new policy.
- 1.3 A Sustainability Appraisal and Strategic Environmental Assessment (SA / SEA) Statement has been prepared to this effect. The preparation of the SPD has been subject to public participation in accordance with Regulation 17.
- 1.4 This statement sets out the following information for the public consultation:
  - A summary of the main issues raised in representations received during the public consultation; and
  - How these issues have been addressed in the SPD.

## **2. CONSULTATION OVERVIEW**

- 2.1 A six-week period of public consultation on the Fen Drayton Former LSA Estate SPD and its associated Sustainability Appraisal Statement took place between 29 October and 10 December 2010. For the consultation the Council set up an interactive website to assist access to the documents and to facilitate making responses online.
- 2.2 A total of 142 representations were received on the SPD. No representations were received on the Sustainability Appraisal Statement. One representation was received on the Habitat Regulations Assessment Statement. The breakdown of these representations is shown in the table below.

### Breakdown of representations received to the SPD:

SPD	Support	Object	Comment	Total
Fen Drayton Former LSA Estate SPD	7	32	102	141
Fen Drayton Former LSA Estate SPD Habitat Regulations Assessment Statement	0	0	1	1
<b>TOTAL</b>	<b>7</b>	<b>32</b>	<b>103</b>	<b>142</b>

#### 2.3 The main issues raised in the representations on the Fen Drayton Former LSA Estate SPD sought:

- clarity regarding the definition of an eligible building and its footprint, including guidance on the necessary evidence that must be submitted with a planning application;
- advice on the utilisation of any remaining land and promote food production;
- further guidance on the siting of new buildings, including whether all buildings must be south facing, and provide specific guidance on the siting of new buildings within the smaller plots on Oaktree Road and Springhill Road;
- clarity regarding the sustainability requirements for the various development options and inclusion of a further option allowing the amalgamation of the footprint of the existing dwelling and any eligible buildings;
- re-classification of buildings from non-surveyed or non-eligible to eligible, following surveys or consideration of evidence submitted;
- changes to the policy wording and boundary of the policy area;
- amendments to the appraisal of existing transport provision to promote current opportunities;
- further guidance on how to achieve the policy requirement to restrict car use and increase the use of sustainable forms of transport, and confirmation that the development will not have an impact on the A14; and
- clarity regarding the delivery of associated infrastructure (e.g. affordable housing, community facilities) and the involvement of the wider community.

### **How these issues have been addressed:**

- 2.4 The schedule in Appendix 1 provides a summary all of the representations received in plan order together with the Council's assessment of them and, where appropriate, proposed amendments to the text of the draft SPD. The proposed changes to the SPD were considered by the Council at a New Communities Portfolio Holder meeting on 8 March 2011 as part of the process of formally adopting the revised SPD. As a result of the comments and questions raised by both Councillors and members of the public who attended the meeting on 8 March 2011, the New Communities Portfolio Holder agreed to adopt the SPD subject to further consideration of the classification of buildings at 54 Park Lane and 33 Cootes Lane.
- 2.5 Following the New Communities Portfolio Holder Meeting, both landowners met with the Planning Policy Team and submitted further written statements supporting their case for classifying these buildings as eligible. Appendix 2 provides a summary of the further evidence submitted, the Council's assessment following further consideration, and where necessary, the proposed amendments to the draft SPD.
- 2.6 The results of the further discussions relating to the classification of the two buildings were considered by the Council at a New Communities Portfolio Holder meeting on 19 May 2011 as part of the process of formally adopting the revised SPD.



**Appendix 1: Schedule of Representations Received, the Council's Response and Changes to the SPD**





# *Fen Drayton Former Land Settlement Association Estate Supplementary Planning Document*

## *Public Participation Report*

1. Introduction to the Supplementary Planning Document

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### *Representations*

### *Nature Summary of Main Issue*

### *Council's Assessment*

### *Action*

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## *1. Introduction to the Supplementary Planning Document*

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29180 - Cambridgeshire County Council

Comment

In light of recent legal developments (CALA Homes decisions), it is suggested that some reference to the Regional Spatial Strategy (RSS) and its re-instated status should be included. It is likely that the anticipated Decentralisation and Localism Bill will not receive Royal Assent until late 2011 or even early 2012 and so the RSS will form part of the development plan for at least another year and so will be of relevance to this SPD.

At the time of drafting the SPD for consultation, the Regional Spatial Strategy (RSS) had been abolished. It is now known that the RSS will not be revoked until the Localism Bill is enacted later this year. Therefore, very soon any reference to the RSS will have no relevance and so in the interests of clarity a reference to the RSS should not be included in the SPD.

No change.

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#### *1.1*

29215

Comment

As a non-LSA resident of Fen Drayton, I very much value the rural atmosphere of the village. I think an experimental or high specification energy-efficient development by individual landowners is an exciting prospect which I would very much support, especially if it benefits the existing smallholders.

Support noted.

No change.

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29230	Comment	Why is this being done in isolation without liaison with national and local bodies? Can't go 'innovative' and 'experimental' without help from other bodies e.g. NFU, universities. Hurdles are too high to do alone.	The public consultation on the draft SPD allowed any individual or organisation to comment on the document and suggest any changes. As well as notifying each of the residential properties and businesses within the policy area of the public consultation, the Council notified the following individuals and organisations: <ul style="list-style-type: none"> <li>* district and county councillors and local MPs,</li> <li>* local parish councils and neighbouring district and county councils,</li> <li>* local housing associations, universities, water and sewerage undertakers, travel and transport providers and organisations promoting sustainable travel</li> <li>* local and national organisations representing house builders and businesses,</li> <li>* local or national energy providers, and</li> <li>* local or national organisations related to protecting the built or natural environment, renewable energy provision or promoting sustainability.</li> </ul>	No change.
29182 29184	Support	Support.	Support noted.	No change.
29286 - Fen Drayton Parish Council	Support	The PC welcomes the document as an attempt to derive a strategy for the former LSA sites that have been in a development limbo for a number of years.	Support noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.3</i>				
29190	Comment	Having lived on the LSA estate since 1968 and been involved in horticulture up until I retired, the SPD appears to give an opportunity to develop a property suitable to my present lifestyle but there are areas of the SPD which either discriminate against age / disability or would incur greater expense to meet the stringent guidelines.	<p>Policy SP/11 allows a greater scale and range of development within the former LSA estate than would normally be allowed in this location, due to its designation as countryside in planning terms. Therefore, to control the impact on the surrounding landscape and character it is necessary to impose more stringent guidelines on any development proposals submitted within the policy area.</p> <p>Policy SP/11 provides the opportunity to develop additional dwellings within the policy area provided that they meet the development and design principles set out in Chapter 5 of the SPD.</p> <p>A response to the comment regarding discrimination against age / disability is provided against representation 29161 (Chapter 4).</p>	No change.
<i>1.4</i>				
29256 - Fen Drayton Parish Council	Comment	Paragraphs DP/d and ST/e, and ST/g and DP/c appear to say the same thing. Is there a real difference of which we should be made aware or is this because they come from 2 different documents?	It is important that any new development complies with the objectives set out in both the Core Strategy and Development Control Policies DPD as these documents guide all development in the district. All four objectives listed seek to ensure that any new development protects and enhances the character of the district while also ensuring that any new development addresses sustainability issues and promotes the principles of sustainable development.	No change.
<i>1.5</i>				
29170 29191	Comment	One of the objectives of the SPD is "to establish clear development and design principles for any new development". Very doubtful if this document achieves this, as the document is complex and hard to digest. It does not give any clear guidelines in a language the laymen can understand.	The document has been written for a wide audience consisting of those with little or no knowledge of the policy to developers with expert knowledge of environmental sustainability and zero carbon living. It is hoped that the changes that have been made as a result of considering the comments from the public consultation will have made the SPD more understandable to all sections of its audience.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>National Planning Policy Context</i>				
29202	Comment	<p>PPS1 lists the 'efficient use of resources' as part of planning. Land being a resource, the efficient use of the land on the LSA estate should be considered.</p> <p>'Enhancement of the physical environment' is also listed and taking land and physical structures out of disuse could contribute to enhancing the current physical environment on a substantial part of the estate.</p> <p>PPS7 is also particularly relevant to the final outcome of any development resulting from the adoption of the policy.</p>	<p>As suggested, the efficient use of resources, the enhancement of the physical environment and the creation of sustainable rural communities are important objectives for the former LSA estate. The purpose of the SPD is to provide guidance on how development can come forward in accordance with Policy SP/11, which is concerned primarily with the redevelopment of existing built structures. Any remaining land can be used for any number of purposes that need to be located in the countryside.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>1.6</i></p> <p>29192 29257 - Fen Drayton Parish Council</p>	<p>Comment</p>	<p>What exactly is the point of these paragraphs, they are very high level, nebulous and obscure, possibly because they are taken out of context. Some of the ideas don't seem to make sense.</p> <p>For example: PPS1: Does this mean that "Planning" produces high quality design or facilitates it? The whole paragraph is indefinable.</p> <p>Supplement to PPS1: The expected effects of climate change are unknown.</p> <p>PPG13: What does this mean for Fen Drayton and the sustainability of local transport?</p>	<p>The section on national planning policy is intended to provide information on the national planning policy context relating to planning and sustainability, and a summary of the overarching national objectives that should be considered when developing any proposal under Policy SP/11. These objectives have been considered in the preparation of the SPD.</p> <p>For clarity, the bullet points relating to PPS1, Supplement to PPS1, and PPG13 should be amended.</p>	<p>Amend the first bullet point following paragraph 1.6 to read:</p> <p>"PPS1: Delivering Sustainable Development - Planning can help facilitate and promote sustainable inclusive developments by ensuring that all new developments are designed to a high quality, make efficient use of resources, and protect and enhance the physical environment and character of the countryside and existing communities."</p> <p>Amend the second bullet point following paragraph 1.6 to read:</p> <p>"Supplement to PPS1: Planning and Climate Change - Development should contribute to reducing carbon emissions and stabilising climate change, and be well adapted to cope with the expected effects of climate change, which include increased flooding, rising sea levels and more extreme weather events."</p> <p>Amend the fifth bullet point following paragraph 1.6 to read:</p> <p>"PPG13: Transport - Planning and transport should be integrated at a national, regional and local level as planning has a key role in effectively delivering transport policies. By guiding the location, scale, design and mix of land uses in any new development, planning can help: reduce the need to travel; reduce the length of journeys; and make it safer and easier for people to use more sustainable forms of transport e.g. walking, cycling and public transport."</p>

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*Representations*

*Nature Summary of Main Issue*

*Council's Assessment*

*Action*

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1.7

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29258 - Fen Drayton Parish Council	Comment	<p>This document is due soon and the indications are that significant changes will be made. Its recommendations could be anticipated but would it not be better to wait for its publication?</p> <p>We note that the new national planning policy, which is due shortly, is expected to soften the constraints being imposed for zero carbon rating and trust that this SPD will anticipate this thinking in aiding the development process for the LSA sites.</p>	<p>In January 2011, the government set out their proposed plans regarding the preparation of a new national planning policy framework. Initial consultation on the shape and priorities for the national planning policy framework carried out in January - February 2011 will be used to prepare a draft for consultation. The government anticipate that the revised national planning policy framework will be finalised in April 2012. Therefore, at this stage it is not possible to predict what information (if any) the new national planning policy framework will have relating to the definition of zero carbon.</p> <p>However, the coalition government has stated their intention to finalise the work being undertaken on the definition of zero carbon for new dwellings and new non-residential buildings. It is likely that this revised definition will include 'allowable solutions' and allow carbon emissions to be offset off-site. As set out in the draft SPD it is likely that both the Code for Sustainable Homes and the BREEAM non-residential standard will be changed once a definition has been agreed.</p> <p>To await the publication of the Government's revised definition before the adoption of the SPD would delay the publication of guidance on how to develop a proposal that will comply with Policy SP/11. The SPD does however recognise that the definition of zero carbon is likely to change during the lifetime of the policy by stating that the Council will use the definition of zero carbon as set out in the SPD except where it has been updated in either the Code for Sustainable Homes or BREEAM non-residential standard.</p> <p>Amend and reorder paragraphs 4.17-4.29 to clarify the definition of zero carbon that will be used when determining planning applications.</p>	<p>Delete the first sentence of paragraph 4.22 and amend the second sentence of paragraph 4.22 to read:</p> <p>"The Government has previously consulted on a revised definition of zero carbon that includes the option of investment in off-site 'allowable solutions' for tackling any remaining carbon emissions that cannot be offset on site."</p> <p>Delete the third, fourth and fifth sentences of paragraph 4.25.</p> <p>Add the first sentence of paragraph 4.29 to the end of paragraph 4.28, and delete the remainder of paragraph 4.29.</p> <p>Move paragraphs 4.23-4.29 to follow paragraph 4.19.</p> <p>Add a new paragraph after paragraph 4.21 that reads:</p> <p>"At the time of preparing this SPD, the definition of zero carbon for new dwellings included in the CfSH correlates with that set out above; however, there is not a definition of zero carbon for new non-residential buildings included in the BREEAM non-residential standard. The Government is however in the process of preparing a revised zero carbon definition that could extend to include both new dwellings and new non-residential buildings; therefore during the lifetime of Policy SP/11, it is likely that the definition of zero carbon (or carbon neutral) will be changed."</p> <p>Add a new paragraph after paragraph 4.22 that reads:</p> <p>"Therefore for purposes of Policy SP/11, the Council will use the definition of zero carbon (or carbon neutral) as included in the CfSH or BREEAM non-residential standard at the time that any planning permission is granted. Until a zero carbon definition for non-residential buildings is included in the BREEAM non-residential standard</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
				or in a new Code for Sustainable Buildings, the Council will adopt the definition of zero carbon as set out in this SPD (see paragraph 4.23)."
29171	Comment	We are being asked to comment on something that will probably be changed.	<p>In January 2011, the government set out their proposed plans regarding the preparation of a new national planning policy framework. Initial consultation on the shape and priorities for the national planning policy framework carried out in January - February 2011 will be used to prepare a draft for consultation. The government anticipate that the revised national planning policy framework will be finalised in April 2012.</p> <p>Paragraph 1.7 should therefore be removed from the SPD, as at the time of adoption of the SPD, the national planning policy context will remain as the PPSs and PPGs listed in the paragraph 1.6.</p>	Delete paragraph 1.7.

## 1.8

29259 - Fen Drayton Parish Council	Comment	<p>Policy subsection 2.56 (final sentence): A small observation, but could this just be called "experimental" as the results are not predetermined and could turn out to be negative.</p> <p>Policy subsection 2.58: This says that measures will be introduced to restrict car use, but there is nothing in the document to confirm or ensure that this will happen.</p>	<p>The SPD can only add detail to a policy; it cannot change the policy. Therefore the wording of the policy and supporting text cannot be amended.</p> <p>Although the policy requires the implementation of measures to restrict car use, measures such as restrictions on parking or the number of trips would not be reasonable in this location. Therefore to meet the requirements of the policy, any new developments should promote opportunities that would allow their occupants to voluntarily reduce car use and increase their use of sustainable forms of travel e.g. through additional bus services, improved cycle ways or introducing car pooling schemes. It is hoped that any new occupants attracted to the policy area as a result of its sustainability credentials will make use of the opportunities for sustainable travel.</p>	No change.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
1.9 29260 - Fen Drayton Parish Council	Comment	Paragraphs 1.9 & 1.10 specifically isolate the village of Fen Drayton in terms of development from the LSA policy. However, certain areas outside of the previous LSA sites are included in the SPD. This could be disadvantageous in that their historic development is not similar to the LSA upon which this policy is based.	<p>The policy area associated with Policy SP/11 was carried forward from the policy area associated with previous policies for the former LSA estate at Fen Drayton. The plan making system does not allow amendments to policies or their policy areas except through a review of the plan, and therefore the Council is unable to amend the policy area until the next review of the Site Specific Policies DPD.</p> <p>Being within the policy area is not a disadvantage for the land or property owners that were not part of the former LSA estate, as the policy allows a greater scale and range of development than would usually be allowed in this location. However, these land and property owners will only benefit from the policy if they have eligible buildings according to the definitions set out in Chapter 4 of the SPD.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>2. Background</b>				
<b>2.16</b>				
29261 - Fen Drayton Parish Council	Comment	This is a useful precedent for investment in integral sustainability schemes.	Comment noted.	No change.
<i>Introducing Climate Change and Sustainable Living</i>				
29244	Comment	<p>Although it is only to be expected in a document of this nature, it is unhelpful and potentially counterproductive to link the very reasonable and sensible objectives of sustainability and energy efficiency with the concept of man-made climate change.</p> <p>The notion of anthropogenic global warming (AGW)/anthropogenic climate change (ACC)/anthropogenic climate disruption (ACD) due to human-induced carbon (dioxide) emissions remains an unproven hypothesis largely founded on the output of unvalidated mathematical models which cannot be tested.</p> <p>The manner in which AGW/ACC/ACD has been politicised and presented to the public, usually in alarmist terms strongly suggestive of catastrophic consequences, has led to a very polarised division of views into 'believers' and 'non-believers'. It is therefore unsurprising that it can be difficult to stimulate wide acceptance of the changes of lifestyle necessary to contribute towards sustainability despite many such changes being relatively simple and inexpensive.</p>	<p>Although there are varying views on climate change, the Council has signed the Nottingham Declaration to acknowledge climate change, and also to pledge to address its causes and prepare its community for the impacts. The Council has also signed the Cambridge Climate Change Charter to demonstrate its commitment to tackling the causes and consequences of climate change.</p> <p>The Council in its work is also responding to the government's policy that all new homes should be zero carbon by 2016. The requirement for any development proposals submitted under Policy SP/11 to be zero carbon is one example of where the Council is seeking to implement this national policy. Other examples include the requirements within the urban extensions to Cambridge for dwellings and non-residential buildings to meet exemplar sustainability standards.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
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2.30 29262 - Fen Drayton Parish Council	Comment	This is far too simplistic and contentious to be included in a policy document.	This paragraph is intended as a simple introduction to the concept of environmental sustainability and the need for each individual's consumption of natural resources to be reduced to within the level that can be supported by the natural world. Through the signing of the Nottingham Declaration and Cambridge Climate Change Charter, the Council has shown a commitment to improving the environmental sustainability of the district and tackling the causes and consequences of climate change.	No change.
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2.32 29263 - Fen Drayton Parish Council	Comment	No references are provided for this statement of carbon emissions, nor any context to say how the total is comprised. However, it is generally recognised that carbon emissions from cars are roughly equal to those emanating from homes on a per person basis. (A good reference that makes no political comment is the local academic David Mackay's Without Hot Air, which contains literally thousands of supporting technical references). Transport sustainability should be given more prominence within the policy otherwise it questions the viability of such an experiment in an area poorly served by public transport and too far from facilities for cycling to play much of a part.	Agree that a reference to the source of the data should be added to paragraph 2.32.  The SPD can only add detail to a policy; it cannot change the policy. Therefore the wording of the policy and supporting text relating to sustainable transport cannot be amended.	Add the following sentence to the end of paragraph 2.31:  "A 'carbon footprint' is expressed as the number of tonnes of carbon dioxide equivalent (or CO2e) emitted per year."  Delete the first sentence of paragraph 2.32. Amend the remainder of the paragraph to read:  "The residents of South Cambridgeshire have one of the highest emissions of carbon dioxide (or CO2) in the eastern region. This has been calculated as approximately 9.3 tonnes of CO2 per resident per annum, of which approximately one quarter comes from the use of gas, electricity and other fuels in our homes (typically for heating, washing, lighting and running appliances). This data is taken from the National Indicator 186 dataset published by the Department for Energy & Climate Change. The provision of new dwellings, or other buildings, that have been designed and constructed to produce zero carbon emissions is therefore an important step towards the goal of returning to 'one-planet' living."
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
2.35 29264 - Fen Drayton Parish Council	Comment	Apart from contradicting paragraph 1.6 which indicates that the future effects of climate change are known, the statement of "increasingly uncertain times" is contentious and equally meaningless.	Paragraph 1.6 is referring to climate change whereas paragraph 2.35 is referring to environmental sustainability.  Although the effects of climate change are known e.g. increased flooding, rising sea levels and more extreme weather events, there is still uncertainty as to the frequency of these events and the exact locations that will be affected by them. However, there is unpredictability over the future of heat, power, water and food supplies that are not locally sourced.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>3. Site Appraisal</b>				
<b>3. Site Appraisal</b>				
29156 - Cambridgeshire County Council	Comment	Fen Drayton LSA is located in an area of high archaeological potential and we would anticipate that development proposals affecting heritage assets would be considered through the usual planning process.	Agree. The SPD is not intended to be read as a standalone document. Any applicant would also need to consider relevant policies and guidance included in the Core Strategy, Development Control Policies DPD, District Design Guide SPD and any other relevant SPDs depending on the proposed development. A note stating this should be added to the SPD.	Amend the first sentence of paragraph 5.2 to read:  "When preparing a planning application, applicants are advised to consider the guidance in this SPD and also that included in the Core Strategy, Development Control Policies DPD, District Design Guide SPD and any other relevant SPDs depending on their proposed development. Applicants may wish to discuss their proposals with the Council prior to submitting a planning application."
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<b>3.5</b>				
29223	Comment	Existing horticultural businesses on site, using co-operative, are not sustainable because of dependence on oil for year round production.	The sustainability of the existing horticultural businesses is reduced due to their dependence on oil, however these existing businesses could be made more sustainable through the use of renewable energy to provide heating and lighting. Any decision to change from oil to renewable energy would be for the business as Policy SP/11 and the SPD are only applicable to new development within the policy area.	No change.
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<b>3.14</b>				
29266 - Fen Drayton Parish Council	Comment	Why are the 2 properties included in the policy area?	The policy area associated with Policy SP/11 was carried forward from the policy area associated with previous policies for the former LSA estate at Fen Drayton. It is unclear why these properties were originally included in the policy area given that they were not part of the former LSA estate. The plan making system does not allow amendments to policies or their policy areas except through a review of the plan, and therefore the Council is unable to amend the policy area until the next review of the Site Specific Policies DPD.	No change.
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Figure e: Views of Middleton Way

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Figure e: Views of Middleton Way</i>				
29234	Object	Figure e(i) should not include my driveway. Picture taken and used without permission.	The picture can be amended to include only the road and boundary vegetation.	Amend figure e(i) to include only the road and boundary vegetation.
<i>3.20</i>				
29160	Comment	The consultation document describes Park Lane as not being within the policy area. However it should be noted that the northern third of the road is shown within the area (the section adjacent to the parish field).	Agree paragraph 3.20 should be amended to make it clear that particular sections of Park Lane are within the policy area.	Amend paragraph 3.20 to read:  "Park Lane is a private road accessed from within the village development framework of Fen Drayton. Daintree's Farm and 54 Park Lane are the only properties on Park Lane that are within the policy area as these are the only properties along Park Lane that were part of the original LSA estate. The original access to these properties was through the former LSA estate from Springhill Road or Cootes Lane. The policy area boundary on the Adopted Proposals Map (published in January 2010) runs through the dwelling at Daintree's Farm and excludes the cow byre located to the east of the dwelling. For the purposes of determining planning applications, the cow byre and dwelling at Daintree's Farm are considered to be included within the policy area."
29267 - Fen Drayton Parish Council	Comment	Why is the property included in the policy area?	The policy area associated with Policy SP/11 was carried forward from the policy area associated with previous policies for the former LSA estate at Fen Drayton. The plan making system does not allow amendments to policies or their policy areas except through a review of the plan, and therefore the Council is unable to amend the policy area until the next review of the Site Specific Policies DPD. However, as Daintree's Farm is known to be part of the former LSA estate and it is likely that a drafting error has excluded the cow byre and a section of the dwelling from the policy area, it is sensible to consider these buildings as within the policy area when considering any planning application(s) for this area.	No change.

Figure j: A piggery on Middleton Way

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Figure j: A piggery on Middleton Way</i>				
29235	Object	Picture should not be used. Picture taken and used without permission. Site visit was for measurement of buildings only.	A replacement picture can be used in the final SPD.	Replace figure j with a new photograph of a piggery and delete the street names from the annotations for figures h - m.
<i>Existing Transport and Access</i>				
29137 - Sustrans (East of England)	Comment	The text should emphasise existing and future public transport opportunities, and solutions to getting to bus stops by bicycle, not difficulties.	<p>As a result of representation 29268, it is now known that there is an hourly bus service. The text of paragraph 3.25 should therefore be changed to reflect this better public transport service.</p> <p>Agree that paragraph 3.28 does not refer to the level of service that the Guided Busway will provide, once opened. Also agree that the distance to the Guided Busway stop from the policy area is within 5km which PPG13 states as a suitable distance for the journey to be undertaken by bicycle. The text of paragraph 3.28 should be amended to reflect frequency of the Guided Busway service and an additional paragraph should be added to refer to the PPG13 suggested distances at which walking and cycling can replace car journeys.</p>	<p>Amend the first sentence of paragraph 3.25 to read:</p> <p>"Existing public transport from Fen Drayton provides some access to services and facilities located in Cambridge, St Ives and Bar Hill."</p> <p>Amend the first two sentences of paragraph 3.28 to read:</p> <p>"The Guided Busway will provide a frequent public transport service between Huntingdon and Cambridge, with a request stop at Fen Drayton Lakes. The Fen Drayton Lakes stop is approximately 1.5 km from the closest existing residents within the policy area (Daintree's Farm) and approximately 3.2 km from the furthest existing residents within the policy area (White Gates)."</p> <p>Add a new paragraph after paragraph 3.28 that reads:</p> <p>"Planning Policy Guidance note 13: Transport states that short journeys of under 5 km have the potential to be undertaken by bicycle, especially if they form part of a longer journey by public transport, and that shorter journeys of under 2 km have the potential to be undertaken on foot. Both the Fen Drayton Lakes Guided Busway stop and the Rookery Place bus stop in Fenstanton are within 5 km of the policy area, and therefore allow for the possibility for the journey to the bus stop to be undertaken by bicycle. The majority of the policy area is within 2 km of the Rookery Place bus stop in Fenstanton, and therefore the journey to the bus stop could be undertaken on foot."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29220 - Cambridgeshire Local Access Forum	Comment	This is a large area with a few buildings, having a recognised footprint for rebuild. It abuts directly onto the A14 and due to this being an already over congested road, it is hoped that there will be no access to or from the A14 to the development.	<p>Although the policy area abuts the A14, all existing dwellings and businesses access the A14 either via the Fenstanton, Fen Drayton or Swavesey junctions, there is no direct access from the former LSA estate onto the A14.</p> <p>The Council recognise that any new development within the policy area could result in increased traffic on the surrounding roads. However, it is most likely that any development proposals will come forward on a piecemeal basis over a number of years and therefore any increase in traffic will be gradual.</p> <p>Although the Council cannot control car use from any new developments within the policy area, it is hoped that any new occupants attracted to the site as a result of its sustainability credentials will make use of the opportunities for sustainable travel.</p>	No change.
<hr/>				
3.25				
29268 - Fen Drayton Parish Council	Comment	There is a bus that runs on an hourly basis during the day that has been omitted.	<p>This service (Citi 5) was not listed on Cambridgeshire County Council's website as a service to/from Fen Drayton. Agree that this service should be included in the table below paragraph 3.25.</p> <p>The Citi 5 service also provides a service to/from Fenstanton, and therefore the table below paragraph 3.26 should be amended to include details of the Citi 5 service also.</p>	<p>Amend the table below paragraph 3.25 to include details of the Citi 5 service, and amend the final sentence of paragraph 3.25 to read:</p> <p>"The bus timetables for Fen Drayton in January 2011 can be summarised as follows:"</p> <p>Amend the table below paragraph 3.26 to include details of the Citi 5 service, and amend the final sentence of paragraph 3.26 to read:</p> <p>"The bus timetables for Fenstanton in January 2011 can be summarised as follows:"</p>



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Survey of Existing Buildings</i>				
29181	Comment	In response to your telephone call I wish to formally ask you to survey our buildings at Sandfield and the buildings at White Gates.	<p>Following a visit to Sandfield, Mill Road, it is agreed that the agricultural building should be classified as an eligible building as it meets both the definition of a building as specified in paragraph 4.6 and was previously used for agricultural purposes.</p> <p>Following a visit to White Gates, Cambridge Road, it is agreed that the buildings should not be classified as eligible as their original use was not agricultural and they have not been legitimately changed to agricultural, although they have been used for agricultural purposes in the past. Also, the buildings are also in various states of repair and therefore some do not have the necessary walls to be classified as buildings.</p> <p>Appendices 2 and 3 need to be updated to reflect these changes.</p>	<p>Amend Appendices 2 and 3 to record the agricultural building at Sandfield as an eligible building.</p> <p>Amend Appendices 2 and 3 to record the buildings at White Gates as non-eligible.</p>
29255	Comment	<p>The owners of the land adjacent to 34 Cootes Lane have asked me to inform you that they want this building [annotated on the attached map] to be included in your survey.</p> <p>At present the fence is shown incorrectly on the plan and actually aligns with the centre of the gable end of the shed.</p> <p>It also appears to belong to 34 Cootes Lane which is not actually the case and you would need to access the site from Cootes Lane and not via the drive of number 34.</p>	<p>Following a visit to land adjacent to 34 Cootes Lane, it is agreed that the former piggery building should be classified as an eligible building as it meets both the definition of a building as specified in paragraph 4.6 and was previously used for agricultural purposes (piggery).</p> <p>Appendices 2 and 3 need to record the piggery as an eligible building.</p>	Amend Appendices 2 and 3 to record the piggery on land adjacent to 34 Cootes Lane as an eligible building.
29207	Comment	I have noticed that several of the surveyed properties have included an outside toilet in their total measurements allowed for redevelopment. As we did not know that these could be included I would be grateful if ours [8 Mill Road] could be included.	<p>Following a revisit to 8 Mill Road, it is agreed that the outside toilet should be included within the eligible footprint.</p> <p>Appendices 2 and 3 should be amended to include this change.</p>	Amend Appendices 2 and 3 to record the outside toilet at 8 Mill Road as an eligible building.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29291	Comment	It would be appreciated if you could arrange for the buildings on land adjacent to 42 Middleton Way to be surveyed.	The buildings on land adjacent to 42 Middleton Way have been surveyed and their eligibility has been assessed. The eligibility of each building is set out in the Council's response to representation 29292 (see Appendix 3).	No change.
29208	Comment	As recently discussed during a telephone conversation with your office regarding the LSA SPD, please make arrangements for a site visit to 34 Cootes Lane for measurements to be taken of our former agricultural buildings.	<p>Following a visit to 34 Cootes Lane, it is agreed that the piggery building should be classified as an eligible building as it meets both the definition of a building and was previously used for agricultural purposes (piggery). The measurements of the eligible building only include the footprint of the building where there are three or more walls and a roof. Areas of hardstanding and the gullies surrounding the piggery have been excluded, as they do not meet the definition of a building as set out in paragraph 4.6.</p> <p>The hardstanding base of the water tank does not meet the definition of an eligible building as set out in paragraph 4.6 and should therefore not be included in the eligible footprint.</p> <p>Appendices 2 and 3 need to be updated to include the piggery as an eligible building rather than not surveyed.</p>	Amend Appendices 2 and 3 to record the piggery at 34 Cootes Lane as an eligible building.

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*Representations*

*Nature Summary of Main Issue*

*Council's Assessment*

*Action*

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***4. Definitions and an Explanation of Terms***

*Defining the Eligible Buildings and their Footprint*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29194	Comment	<p>The definition of footprint discriminates against elderly and disabled people.</p> <p>All buildings erected for horticultural purposes and no longer required due to retirement should be included as eligible buildings.</p>	<p>A response to the comment regarding discrimination against age / disability / health is provided against representation 29161 (Chapter 4).</p> <p>The Council agrees that for a building to be eligible, it must:</p> <ul style="list-style-type: none"> <li>* have been erected for agricultural purposes or have been formally changed to agricultural;</li> <li>* not have not been formally changed to a non-agricultural use through a planning permission;</li> <li>* have been standing at 28 January 2010; and</li> <li>* meet the criteria for classification as a building as set out in paragraph 4.6.</li> </ul> <p>To ensure that the SPD includes a clear definition of eligible buildings paragraphs 4.10-4.13 and 4.15-4.16 should be amended.</p>	<p>Amend the second sentence of paragraph 4.10 to read:</p> <p>"Other buildings not considered to be agricultural are non-agricultural workshops, kennels, offices, garden sheds, domestic garages and studios where the building was originally constructed for any such purposes or has been formally changed to this use through the implementation of a planning permission."</p> <p>Add the following sentence to the end of paragraph 4.10:</p> <p>"The implementation of a planning permission extinguishes the previous use of the building."</p> <p>Delete paragraph 4.11.</p> <p>Amend paragraph 4.12 to read:</p> <p>"Where any original agricultural buildings have been legitimately replaced with newer agricultural buildings in existence at the qualifying date, either under permitted development rights or through a planning permission, these will be treated as eligible buildings if they are no longer needed for agricultural purposes. Where a replacement building is unauthorised either because it is not permitted development or because it has not been granted planning permission, the building will not be treated as an eligible building."</p> <p>In paragraph 4.13, make bold the following words: "no longer needed for agricultural purposes".</p> <p>Amend the first sentence of paragraph 4.15 to read:</p> <p>"To help provide as much certainty as possible as to which buildings can be deemed to be eligible buildings, the SPD identifies in Appendices 2 and 3 those buildings that are eligible, non-eligible and not surveyed."</p> <p>Delete the remainder of paragraph 4.15 and the final sentence of paragraph 4.16.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
				Combine paragraphs 4.15 and 4.16, and move the combined paragraph to follow 4.12.
29162 - LSA Owners Group 29205 29206	Object	<p>Originally the plots within the LSA estate were all very similar, therefore it might have been better to determine a 'typical / average' footprint pro rata to the size of the plot rather than going through the process of determining the footprint of each plot individually, which has resulted in a significant bias.</p> <p>Eligibility of a building should be based on its original agricultural status irrespective of whether it remains in its original form, in disrepair or whether it has since been replaced. Original hardstandings should therefore form part of the footprint as its existence recognises the fact that an original agricultural building once stood there.</p> <p>To exclude buildings that have recently been demolished is unfair and discriminates against those who have recently demolished buildings and not replaced them.</p>	<p>Policy SP/11 allows the reuse or redevelopment of buildings still in existence at the time the Site Specific Policies DPD was adopted in January 2010 that are no longer needed for agricultural purposes. The purpose of this policy is to find a future sustainable use for the former agricultural buildings within the policy area following the demise of the use of land for agricultural and horticultural uses.</p> <p>Although the policy allows development, it is necessary to control the impact of any development proposals on the surrounding landscape and character due to its designation as countryside in planning terms. The policy therefore restricts any development to that which can be accommodated within the existing footprint, to ensure that the current openness of the area is protected. This is consistent with the national policy relating to development on major sites within the Green Belt.</p> <p>As the policy has been specifically written to apply to the current situation on the former LSA estate, it is reasonable to use the footprint of the eligible buildings at the date of adoption of the policy rather than the footprint of the buildings that existed at time of the former LSA estate. To ensure that the existing footprint is not exceeded it has been necessary to record the dimensions of all the eligible buildings. The division of this footprint within the policy area is a matter for the landowners, as the SPD allows flexibility in the location and amalgamation of any footprint developed under the terms of the policy.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
4.2 29161 - LSA Owners Group	Object	The footprint definition discriminates against some who, for reasons of age or health, require only ground floor accommodation and would not have the advantage of 1st/2nd floor areas when comparing values. There should be an exception if personal circumstances can justify such an exception. This could relate to mobility and age issues. It would be unreasonable and unfair to discriminate against those who require accommodation on the ground floor only.	<p>Policy SP/11 allows a greater scale and range of development within the former LSA estate than would normally be allowed in this location, due to its designation as countryside in planning terms. Therefore, to control the impact on the surrounding landscape and character it is necessary to impose more stringent guidelines on any development proposals submitted within the policy area.</p> <p>To increase the footprint of a proposed single storey dwelling by including the potential floorspace from any additional floors would have an impact on the openness, landscape and character of the area, which the stringent guidelines of the policy are designed to protect. However, the SPD does not prevent single storey dwellings from being developed provided that the equivalent eligible footprint is identified for reuse/redevelopment.</p>	No change.
4.6 29237	Object	The Town & Country Planning Act 1990 clearly states the definition of a building therefore paragraph 4.6 should be removed. A planning department should not rewrite planning law when it already exists.	Paragraph 4.6 sets out the criteria used to assess the eligibility of each of the buildings and structures included within the policy area. The criteria have been derived from the Town & Country Planning Act definition of a building and the subsequent planning case law. It is important that the criteria used are clearly defined in the SPD so that any non-surveyed buildings assessed at the time of a planning application will be assessed using the same criteria as those classified in the SPD, therefore ensuring a consistent approach.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>4.8</p> <p>29163 - LSA Owners Group 29238</p>	<p>Object</p>	<p>The policy clearly states the exclusion of glasshouses, it makes no mention of the exclusion of ancillary buildings or plant ancillary to the operation of glasshouses. This would infer that all other buildings no longer required for agricultural purposes should be included. Water tanks, pump and boiler houses are as important, if not more so, than packing sheds, and are therefore agricultural buildings.</p>	<p>The policy specifically excludes glasshouses due to the temporary nature of their construction and the significant area of land that they cover. To allow these to be redeveloped would result in significant changes to the openness and character of the area, and would not be consistent with the former LSA estate being designated as countryside in planning terms. However, in considering the representations received, the Council agrees that pump houses and boiler houses could meet the definition of a building as set out in the SPD. Equally they could be considered so essential to the operation of the glasshouses that they are caught by the glasshouse exemption. These buildings are associated with the horticultural use of the site therefore they meet the definition of having previously been used for agricultural purposes. The inclusion of pump houses and boiler houses within the eligible footprint available for redevelopment would not have a detrimental impact due to their limited number and size. The SPD should therefore be changed to include pump houses and boiler houses as eligible buildings.</p> <p>Water tanks should not be included as eligible buildings as they do not meet the definition of a building. They are also of a temporary nature. Amend paragraphs 4.8 and 4.10 to include pump houses and boiler houses in the definition of an eligible building and to explain the exclusion of glasshouses.</p> <p>Amend Appendices 2 and 3 to include all pump houses and boiler houses.</p>	<p>Amend paragraph 4.8 to read:</p> <p>"Policy SP/11 specifically excludes glasshouses, this is due to glasshouses being considered as temporary structures but also due to their significant footprint. To allow the redevelopment of glasshouses would result in significant changes to character of the area and would not be consistent with the former LSA estate being designated as countryside in planning terms."</p> <p>Amend the first sentence of paragraph 4.10 to read:</p> <p>"Therefore for the purposes of Policy SP/11, piggeries and any associated extensions, general purpose agricultural buildings, agricultural workshops, packing sheds, boiler houses and pump houses will be treated as agricultural buildings, whereas stables, field shelters and tack rooms constructed for the keeping of horses will not be treated as agricultural buildings."</p> <p>Amend Appendices 2 and 3 to include all pump houses and boiler houses.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
4.10 29164 - LSA Owners Group	Object	For the avoidance of doubt this paragraph should clarify that buildings currently used as stables, tack rooms etc can be included if their former use was agricultural. The same should apply to kennels, offices, sheds etc.	<p>As stated in the draft SPD, buildings that are currently being used for non-agricultural purposes can only be included as eligible buildings if they have not been formally changed to that use through the implementation of a planning permission.</p> <p>Amend paragraphs 4.8, 4.10, 4.11 and 4.12 to clarify which buildings can be classified as eligible.</p>	<p>Amend the second sentence of paragraph 4.10 to read:</p> <p>"Other buildings not considered to be agricultural are non-agricultural workshops, kennels, offices, garden sheds, domestic garages and studios where the building was originally constructed for any such purposes or has been formally changed to this use through the implementation of a planning permission."</p> <p>Add the following sentence to the end of paragraph 4.10:</p> <p>"The implementation of a planning permission extinguishes the previous use of the building."</p> <p>Delete paragraph 4.11.</p> <p>Amend paragraph 4.12 to read:</p> <p>"Where any original agricultural buildings have been legitimately replaced with newer agricultural buildings in existence at the qualifying date, either under permitted development rights or through a planning permission, these will be treated as eligible buildings if they are no longer needed for agricultural purposes. Where a replacement building is unauthorised either because it is not permitted development or because it has not been granted planning permission, the building will not be treated as an eligible building."</p>



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><b>4.13</b></p> <p>29239</p>	Comment	<p>Keith Miles (Planning Policy Manager) agreed at a council meeting in front of Councillors that any building marked red on the maps would not require further proof of former or current use. I expect this to be fully documented and honoured in principal and execution. If this is not the case why undertake the surveys? What value would these surveys have if an unknown official is allowed to supersede agreed designations?</p>	<p>Agree. For any buildings marked as eligible, further proof of the former or current use of the building will not be required. However, proof will be required that the building is no longer needed for agricultural purposes and can therefore be reused or redeveloped under Policy SP/11.</p> <p>For any buildings marked as not surveyed, evidence of how the building is eligible (based on the definitions and criteria set out in the SPD) will be required with any planning application submitted for its reuse or redevelopment. Again, proof will be required that the building is no longer needed for agricultural purposes.</p> <p>To clarify this, delete paragraph 4.11 so that the only reference to the need to submit evidence of the agricultural eligibility of a building is included in paragraph 4.16 and relates to buildings not surveyed.</p> <p>However, it is important that evidence is submitted to demonstrate that the building is no longer required for agricultural purposes as any buildings reused or redeveloped under Policy SP/11 should not need to be replaced with new agricultural or horticultural buildings at a later date. To clarify this, paragraph 4.13 should be amended.</p>	<p>Delete paragraph 4.11.</p> <p>Delete the second and third sentences of paragraph 4.13. Replace the fourth sentence of paragraph 4.13 with the following words:</p> <p>"Where it is satisfactorily demonstrated that an eligible building is no longer required for agricultural purposes, and the associated planning permission for its reuse or redevelopment has been implemented, a later planning application for a new agricultural building on the same smallholding will not normally be permitted for a period of 10 years from the date of the first occupation of the new building."</p>
<p><b>4.14</b></p> <p>29165 - LSA Owners Group</p>	Object	<p>The compliance table is too broad brushed and fails to take into consideration buildings that, for instance, were originally agricultural and converted to other uses (as listed). The table should be deleted and eligibility based on original agricultural status as set out in paragraph 4.11.</p>	<p>Agree, paragraph 4.14 and its associated table should be removed as it cannot capture the definition of an agricultural building as set out in the preceding paragraphs and the consequences of formal or informal changes of use to the building over time.</p>	<p>Delete paragraph 4.14 and its associated table.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
4.16 29166 - LSA Owners Group	Comment	In the event that Owners fail to come forward at this stage on whatever grounds the unsurveyed buildings should remain eligible subject to documentary proof. In addition if a building has been surveyed and the owner has made no subsequent representations because of absence or illness for example then this should not preclude them from making representations on their own buildings in the future.	<p>As stated in paragraph 4.16, in cases where it has not been possible to survey a smallholding and assess the eligibility of the buildings, and in any other exceptional circumstances, any planning application for the reuse or redevelopment of buildings will need to be accompanied by documentary proof of how the buildings meet the definitions set out in Chapter 4 of the SPD and can therefore be termed eligible.</p> <p>The Council has now surveyed 51 former LSA smallholdings. The Council was unable to survey 4 former LSA smallholdings. Paragraphs 3.30 and 3.31 should be updated to reflect this.</p>	<p>Amend the final sentence of paragraph 3.30 to read:</p> <p>"In the preparation of this SPD, the Council visited 51 former LSA smallholdings between May 2010 and February 2011, and the number, use and size of buildings were recorded."</p> <p>Amend the final sentence of paragraph 3.31 to read:</p> <p>"The Council was unable to survey 4 former LSA smallholdings."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Defining Groundbreaking and Experimental Sustainable Living</i>				
29179 29210 29247 29270 - Fen Drayton Parish Council 29272 - Fen Drayton Parish Council	Comment	The stated objectives of the SPD (experimental, innovative and groundbreaking) are ruled out by definition, because any forms of development or re-development will be subject to assessment according to established standards. If it is truly experimental then the outcome is unknown at the start and could not therefore be certified. For any method of construction, use of energy saving device or renewable energy generation, the parameters must be known to meet the specifications required, which implies that they have been tried and tested.	Although the Council will use established national standards (the Code for Sustainable Homes and BREEAM non-residential standard) to assess any development proposals, this does not prevent the development from being innovative, experimental and groundbreaking. Both the Code for Sustainable Homes and BREEAM non-residential standard have flexibility in how a particular rating is reached, due to their credit system of scoring a development proposal. Therefore innovative and experimental development proposals can still achieve the required standards set out in the SPD. At the same time tried and tested methods and systems can be used to achieve development proposals that meet CfSH Level 6. Any residential development that achieves zero carbon before 2016 or any non-residential development that achieves zero carbon before 2019 can be considered as groundbreaking as they would be achieving the standard ahead of the government's requirement. In the whole of England, Wales & Northern Ireland only 19 certificates have been issued for completed CfSH Level 6 dwellings (as at September 2010, see: <a href="http://www.communities.gov.uk/publications/corporate/statistics/codesustainable/q32010">http://www.communities.gov.uk/publications/corporate/statistics/codesustainable/q32010</a> ). Therefore the completion of a CfSH Level 6 dwelling is significant, and the completion of more than one CfSH Level 6 dwelling in the same location is groundbreaking.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29195	Comment	The definitions set out in paragraphs 4.22-4.30 appear to be more appropriate for multiple builds.	It is possible to achieve CfSH Level 6 on individual dwellings or small groups of dwellings. There are a number of case studies where this has been done, see: * Miller Zero, Basingstoke [ <a href="http://www.millerhomes.co.uk">www.millerhomes.co.uk</a> or <a href="http://www.house-builder.co.uk/documents/CORSER-Adrian.pdf">www.house-builder.co.uk/documents/CORSER-Adrian.pdf</a> ] * One Earth Homes, Upton [ <a href="http://www.mhp-development.co.uk/uptoncode6houses.html">www.mhp-development.co.uk/uptoncode6houses.html</a> ]* Mountsorrel, Leicestershire [ <a href="http://www.greenbuildingpress.co.uk/article.php?article_id=617">www.greenbuildingpress.co.uk/article.php?article_id=617</a> ] * BRE Innovation Park [ <a href="http://www.bre.co.uk/page.jsp?id=634">www.bre.co.uk/page.jsp?id=634</a> ] * Mendip Place, Chelmsford [ <a href="http://www.ingletonwood.co.uk/library/www/portfolio/residential/mendip-road.aspx">www.ingletonwood.co.uk/library/www/portfolio/residential/mendip-road.aspx</a> ]	No change.
29155 - Cambridgeshire County Council	Support	We welcome and commend the direction of the SPD as 'any new development must be zero carbon, innovative and ahead of the times by achieving standards significantly above those required and achieved elsewhere. For example, any new residential development must achieve Code for Sustainable Homes Level 6, which is the highest sustainability rating for dwellings'.  We suggest that the term 'zero carbon' be replaced with 'low carbon' given the uncertainty around definition of zero carbon that remains, and is likely to remain, for some time.	The term carbon neutral (or zero carbon) is taken from the supporting text that accompanies Policy SP/11. Although the SPD includes the current definition of zero carbon, it also includes a reference to the proposed changes to the definition that could be introduced during the lifetime of the policy. As recognition of these likely changes, the SPD states that the Council will use the definition of zero carbon as set out in the SPD except where it has been updated in either the Code for Sustainable Homes or BREEAM non-residential standard at the time of any planning permission.	No change.
4.20				
29240	Comment	What would happen if more energy is consumed in any one year than was produced? Does the Council intend to police this issue of zero carbon and if so how?	The Council will not police actual energy consumption, however the development must achieve CfSH Level 6 accreditation at both the design and post-completion stages.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
4.30 29229	Comment	Please provide references to where these definitions have been taken from.	The definitions of groundbreaking and experimental have been developed from dictionary definitions of experimental and groundbreaking and tailored to this particular context.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5. Development and Design Principles</b>				
<b>5. Development and Design Principles</b>				
29249 29287 - Fen Drayton Parish Council	Comment	<p>The impression is that whole site or collaborative development should be looked upon rather more favourably particularly as it would be easier to tackle the more intangible aspects of sustainability such as transport rather than try and coordinate a strategy with many small disparate initiatives.</p> <p>Individual or small group construction will inevitably be proportionately more expensive and of limited efficiency. Consideration should be given to the possibility of whole site or part site development while retaining the overall constraint on the number of buildings. Such an approach would be more likely to enhance the environment of the former LSA estate as well as the village itself.</p>	<p>The SPD is intended to provide guidance on individual, small group and whole site developments. There is not a preferred option; it will be for the landowners within the policy area to decide on the most suitable option. This should be clarified at the start of Chapter 5.</p>	<p>Amend the first sentence of paragraph 5.1 to read:</p> <p>"The development and design principles set out in this chapter provide a framework against which any development proposals (for individual or groups of buildings) will be judged."</p>
29211 29252 29265 - Fen Drayton Parish Council 29271 - Fen Drayton Parish Council	Comment	<p>Insufficient emphasis on importance of food production, which was original scope of LSA, consistent with rural setting, consistent with excellent soils and consistent with current government guidelines. Allotments are a useful start but could not more food production be encouraged by offsetting it as part of the zero carbon equation?</p> <p>Although local food production is a nice idea, in reality it is unlikely to be a viable proposition. If it were, then all of the holdings would now be under cultivation and we would not be in engaged in this consultation.</p>	<p>The purpose of this policy is to find a sustainable use for the former agricultural buildings within the policy area following the demise of the use of land for agricultural and horticultural uses. Although the policy allows a greater scale and range of development than would normally be allowed in this location, this does not prevent the use of the land for food production.</p> <p>Food production is an important part of achieving the principles of sustainable living, and therefore to ensure that all new residents have the opportunity to grow their own produce, the SPD specifies that all new dwellings must have a dedicated allotment area.</p> <p>Neither the Code for Sustainable Homes or the BREEAM non-residential standard, the Council's chosen assessment procedures, include carbon credits for food production, due to the complexities of calculating and monitoring its impact, therefore it is unreasonable for the Council to develop its own assessment procedure for calculating carbon credits from food production.</p>	<p>No change.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29193 29251	Comment	Derelict sites are not addressed and will continue to remain unused. Apart from the provision of allotment areas, the policy document contains no concrete plans for the effective utilisation of the remaining land area.	Policy SP/11 allows the reuse or redevelopment of buildings no longer needed for agricultural purposes. The purpose of this policy is to find a future sustainable use for the remaining buildings that no longer have a viable agricultural or horticultural use. Although not explicitly set out in the SPD, the remaining land area can be utilised for any activities that support the principles of sustainable living (where accompanying buildings are not required) or for any other countryside uses. Examples include the use of land for: * food production or the keeping of animals, either for individual consumption or resale locally; * land share schemes [e.g. www.landshare.net]; or * renewable energy technologies e.g. photovoltaic panels.  For clarity, this information should be added to the SPD.	Insert the following title above paragraph 5.17:  "USE OF THE LAND"  Add a new paragraph after paragraph 5.18 that reads:  "Any remaining land within the former LSA estate can either be utilised for any activities that support the principles of sustainable living (where accompanying buildings are not required) or for any other countryside uses. Examples include the use of land for: * food production or the keeping of animals, either for individual consumption or resale locally; * land share schemes [e.g. www.landshare.net]; or * renewable energy technologies e.g. photovoltaic panels."  Move paragraph 5.19 to follow paragraph 5.3.
29222 - Cambridgeshire Local Access Forum	Comment	The document states that many of the glasshouses are derelict. Is there evidence that the area is currently used by the public for informal recreation such as footpaths, cycle courses, bridleways or even an informal football pitch? If so, scope should be built into the plans to develop these facilities.	The land within the policy area is within private ownership, either for business, agricultural / horticultural or residential use, and therefore the only public use of the area is via the network of public footpaths.	No change.
5.2 29167 - LSA Owners Group 29243	Comment	The SPD is very detailed but I do feel the Council has gone overboard and made this policy difficult to deliver. Clearly anyone interested is going to incur far more expense than a standard one off build just getting an application through the planning process. If the Council is serious in seeing this policy come to fruition then it would be appropriate that any pre-application planning fees are waived for a period of time due to the complexity of the policy and potential numbers of applications.	The Council introduced a charging structure for its pre-application advice in October 2009 as part of its introduction of a formalised pre-application advice procedure, in response to an increased demand for advice and also to ensure that the advice given was provided in a consistent and structured format. For these reasons it is not appropriate to waive or suspend pre-application advice fees. The guidance sets out a number of exemptions from charging and where applicable these will be applied in relation to advice sought regarding Policy SP/11.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Use of Eligible Buildings and their Footprint</i>				
29178 29250 29297 - LSA Owners Group	Object	<p>Plots with only small footprints will be significantly disadvantaged (limited to only one small dwelling) unless workspace is to be allowed in addition. Workspace should not be limited to a home office. If it is intended to create a more balanced community, suitable workspace for craftsmen and tradesmen must also be included within the mix.</p> <p>Ancillary buildings required for the smallholding or as workshops should also be approved as is currently the situation.</p> <p>Is the provision of a garage, garden shed, secure cycle parking and a dedicated space for home working outside of the footprint? Is the provision of space for heat pumps, eco-controls, wheelie bins etc outside the footprint? In other words "footprint" should be for living space only.</p>	<p>As set out in the SPD (paragraph 5.4), all development proposals must be able to be incorporated within a footprint no larger than the existing footprint of the buildings deemed eligible. Therefore all new buildings, either for residential or employment use, must be provided within the footprint of the eligible buildings.</p>	No change.
29168 - LSA Owners Group	Object	<p>Flexibility should be provided with regard to new footprints if personal circumstances exist.</p>	<p>The SPD allows flexibility in the use of the eligible footprint, it can be used:</p> <ul style="list-style-type: none"> <li>* to create a CfSH Level 6 dwelling or a BREEAM outstanding non-residential building;</li> <li>* in conjunction with the existing dwelling to create a dwelling achieving CfSH Level 5 alongside upgrading the energy efficiency and reducing carbon emissions of the existing dwelling; or</li> <li>* in combination with the footprint of the existing dwelling to create a new dwelling that achieves CfSH Level 5.</li> </ul> <p>The SPD also allows any eligible building to be combined with any other eligible building to provide a greater eligible footprint.</p>	No change.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>5.6</p> <p>29213 29273 - Fen Drayton Parish Council</p>	<p>Comment</p>	<p>The transfer of development rights within and between the sites is not sufficiently well described or explored in any detail and could give rise to unwarranted speculation and legal issues. It most likely offers the greater gain to developers rather than the site holders, who are supposed to be the beneficiaries of this policy.</p> <p>The establishment of a second village through the amalgamation of qualifying footprints into a high density development would probably jeopardise community cohesion and would counter the goals of the policy. Better to allow greater flexibility and incentives at the individual level and to think through the transferability policies in greater detail.</p>	<p>The current location and size of each of the individual eligible buildings may not always be the most suitable for the new building(s) proposed and therefore it is necessary to allow the flexible use of the eligible footprint within the former LSA estate, either by combining or dividing the eligible footprint within a plot or between one or more plots. The legal implications of combining or dividing footprints between two or more landowners is not a planning matter and would therefore need to be agreed between the landowners outside of the planning application process. However, any planning application submitted must accurately reflect the landownership of the applicant or applicant(s) and clearly state the area of land that should be considered as part of the planning application.</p> <p>The amalgamation of eligible footprints should not result in a high density development, as the development and design principles set out in Chapter 5 of the SPD specify that any new development must be designed and located having regard to its impact on the surrounding rural landscape and character. Any new development should not have a greater impact on its surroundings than the building(s) its replacing.</p>	<p>No change.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Siting and Scale of New Buildings</i>				
29174 29196 29248	Comment	<p>Fragmented or small cluster development will probably sit awkwardly among the existing homes unless positioning is planned very carefully. All siting options are likely to create considerable practical and legal problems in terms of access and the provision of services and would incur costs in addition to what is likely to be an expensive project.</p> <p>By back building, roads, lights and utilities would have to be extended (Middleton Way does not have road lights therefore the area is really dark) and refuse would need to be dragged down the road for collection. All these discriminate against the elderly / infirm and disabled.</p> <p>Back building would not enhance the village - it would end up rather ad hoc - this is a fenland village and infilling would seem more appropriate, even though you feel that the difference between the original houses and the new builds would not be suitable.</p>	<p>The purpose of the SPD is to set out the guiding principles for any new development within the former LSA estate, which has a separate feel and character to the rest of the village of Fen Drayton. Careful consideration of site layout and building design is necessary in preparing any development proposal to ensure that there is no harm to the surrounding landscape and character, to ensure that all new buildings are fit for purpose, and to overcome any practical issues relating to access, connection to services and accessibility.</p> <p>Any legal issues arising from a development proposal are not planning matters and would therefore need to be agreed between the landowners / developers / applicants outside of the planning application process.</p> <p>It is recognised that locating development away from the roads and existing dwellings will have practical implications for connections to services, however the inclusion of renewable energy technologies, systems for the reuse of water and other sustainability measures in any new building will mean that in some instances conventional connections will not be required.</p> <p>For clarity, the SPD should be amended to clearly state that all planning applications submitted will be determined based on their individual merits and that the Design &amp; Access Statements submitted should clearly set out how the design of the development responds to its context and setting.</p>	<p>Insert the following sentence after the first sentence of paragraph 5.1:</p> <p>"Each planning application submitted will be assessed on its individual merits."</p> <p>Amend the first sentence of paragraph 5.3 to read:</p> <p>"When submitting a planning application, applicants should provide information in their Design &amp; Access Statement on how the development and design principles set out in this chapter have been considered, including clearly setting out how the design of the development responds to its context and setting."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29241	Comment	While a proposed building height of 9m is welcomed it does raise the very important issue of discrimination where for age or health reasons a single storey would be more appropriate. We have an ageing population and this should be taken into consideration. This height restriction would result in losing potential living space if somebody just wanted a single storey dwelling. I do not consider in most situations a building of a different height would be to the detriment of the aesthetic appeal of LSA land or its environs. Surely a mix of single and two storey dwellings would look better than if all were uniformly 9m high. Therefore it would be advantageous that the policy should reflect this and state either 9m in height or double the footprint at single storey.	<p>Paragraph 5.9 states that any new buildings must be no higher than 9 metres, therefore buildings can be single storey or two storeys depending on the users requirements.</p> <p>A response to the comment regarding discrimination against age / disability / health is provided against representation 29161 (Chapter 4).</p>	No change.
29209 29253	Object	<p>Proposed guidance for location of new buildings away from the road frontages and to the rear of existing dwellings restricts the potential for new development on plots such as 52 &amp; 53 Springhill Road where the existing building line is south facing and the plots are substantially different in size, shape and orientation from the majority on the site.</p> <p>Paragraph 5.13 states that you cannot have infill between existing buildings because the south facing buildings would not be compatible with the existing building line. This would not be the case on Oaktree Road where the current houses are approximately due south / north facing. There are large gaps in places and more tightly packed groups of houses and therefore the addition of new houses along the current building line would not greatly change the character of the area. Also due to the size of the plots, it would not be easy to "hide" the new properties away from the current building line without it looking rather out of place. The SPD should therefore allow new houses to be added in line with the current building line when they will all be south facing.</p>	<p>The character of Oaktree Road and Springhill Road is very different to the character of Cootes Lane, Middleton Way and Mill Road due to the smaller plot sizes, greater spacing between the dwellings and the absence of glasshouses and large horticultural buildings. Along these two roads, the plot sizes do not allow development to be sufficiently set back from the existing building line and therefore infill development along the road frontage will be permitted subject to any new buildings being designed to respect the architectural design, massing, scale, rhythm and style of the existing buildings. The orientation of these two roads allows any new buildings to follow the existing building orientation and also achieve maximum solar gain. It is likely that the siting of the existing piggeries will be the most appropriate location for any new buildings.</p> <p>The SPD should be amended to specify the guidelines for the location and siting of new buildings along Oaktree Road and Springhill Road.</p>	<p>Insert the following title above paragraph 5.13: "Cootes Lane, Middleton Way and Mill Road"</p> <p>Insert the following title and paragraph below paragraph 5.16: "Oaktree Road and Springhill Road The character of Oaktree Road and Springhill Road is very different to the character of Cootes Lane, Middleton Way and Mill Road due to the smaller plot sizes, greater spacing between the dwellings and the absence of glasshouses and large horticultural buildings. Along these two roads, the plot sizes do not allow development to be sufficiently set back from the existing building line and therefore infill development along the road frontage will be permitted subject to any new buildings being designed to respect the architectural design, massing, scale, rhythm and style of the existing buildings. The orientation of these two roads allows any new buildings to follow the existing building orientation and also achieve maximum solar gain. It is likely that the siting of the existing piggeries will be the most appropriate location for any new buildings."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29233	Support	Support guidance on location of dwellings especially orientation. And shelter belts for aesthetic reasons.	Support noted.	No change.
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<i>5.10</i>				
29274 - Fen Drayton Parish Council	Comment	This policy completely undermines the footprint rule without any time constraints being applied. It appears that provided the building meets the original rating an extension is permitted.	<p>As set out in the SPD, it is not appropriate to allow extensions to any new dwellings as Policy SP/11 does not allow for any increased footprint within the policy area. For the same reason, it is not appropriate to allow buildings or enclosures within the curtilage of the dwelling for a purpose incidental to the enjoyment of the dwelling.</p> <p>To remove any uncertainty regarding extensions and to specify that any other additional footprint within the curtilage of a new dwelling will require planning permission, paragraph 5.10 should be amended.</p>	<p>Amend the paragraph 5.10 to read:</p> <p>"Policy SP/11 does not allow for any increased footprint within the policy area and therefore it would not be appropriate to allow additional footprint within the policy area without it being subject to scrutiny through the planning application process. Any new dwellings permitted under Policy SP/11 will be subject to a condition removing their permitted development rights to: enlarge, improve or alter the dwelling (Class A); and provide or alter a building or enclosure within the curtilage of the dwelling for a purpose incidental to the enjoyment of the dwelling (Class E). Planning permission will therefore be required for any development that falls within Classes A and E of Part 1 of Schedule 2 of the General Permitted Development Order. Any planning application submitted will be assessed on its individual merits, with the key objective being to minimise any impact on the countryside."</p> <p>Move the amended paragraph 5.10 to follow paragraph 5.4.</p>
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>5.11</i></p> <p>29275 - Fen Drayton Parish Council 29296</p>	Comment	<p>Provided the building complies with the required rating standard does the orientation really matter? Why do any new buildings have to be south facing when PV panels do not have to be in the roof and can be located anywhere providing they are south facing? If there is a separately located bank of PV panels that tracks the sun this is surely sufficient?</p>	<p>Agree, photovoltaic panels can be located on any south facing roof slope or in any other south facing location, however buildings that are south facing maximise the opportunities for solar gain (i.e. natural heating and lighting). To achieve the required sustainability standards, south facing buildings are desirable but not essential. The references to the orientation of buildings in Chapter 5 should therefore be either amended or removed.</p>	<p>Delete the second and third sentences of paragraph 5.11. Combine paragraphs 5.11 and 5.12.</p> <p>Amend the second sentence of paragraph 5.14 to read:</p> <p>"Buildings set back from the road frontages have the potential to be suitably orientated to achieve the required sustainability standards without disrupting the predominant building line, to share access with the existing dwellings if appropriate, and to reduce the costs and practical issues associated with conventional service provision."</p> <p>Delete the final sentence of paragraph 5.15.</p> <p>Amend the second sentence of paragraph 5.16 to read:</p> <p>"This location away from the existing dwellings and associated buildings would allow any new buildings the flexibility to be suitably oriented to achieve the required sustainability standards."</p> <p>Amend the third bullet point following paragraph 5.48 to read:</p> <p>"consideration of the internal layout and position of windows, doors and roof lights to make best use of higher temperatures and daylight - to maximise solar gain, circulation rooms (e.g. living rooms and kitchens) incorporating tall windows should be located along the south facing elevation whilst operational rooms (e.g. bathrooms and utility spaces) with small windows should be located along the northern elevation;"</p>

<i>Representations</i>	<i>Nature Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>5.13</p> <p>29173</p> <p>29242</p>	<p>Comment Why should infill destroy the rural character of the area when there are large distances between the original dwellings on Mill Road? How far away from the road side?</p>	<p>The rural character of Mill Road is created by the scale, mass and rhythm of the existing dwellings. Any new development that is visible between the existing dwellings will detract from this and therefore affect the rural character. To protect this character, any new buildings permitted under Policy SP/11 should be set back from the road frontage and all new buildings should be set back a minimum of 10 m from the rear of the existing dwellings.</p> <p>Paragraph 5.13 should be amended to be clear in the reasoning as to why infill is not appropriate, paragraph 5.14 should be amended to include the minimum distance from the existing dwellings, and paragraph 3.16 should be amended to record the similarities between Mill Road and Middleton Way.</p>	<p>Amend the first sentence of paragraph 5.13 to read:</p> <p>"Along the existing Cootes Lane, Middleton Way and Mill Road frontages, infill between the existing dwellings with contemporary sustainable buildings would not be appropriate as the existing rural street scene (defined by the scale, massing and rhythm of the existing dwellings) would be altered and the character of the area would become urbanised."</p> <p>Add the following sentence to the end of paragraph 5.14:</p> <p>"To protect the rural character created by the existing building line, any new buildings should be set back a minimum of 10 metres from the rear of the existing dwellings."</p> <p>Add the following sentence after the fifth sentence of paragraph 3.16:</p> <p>"The dwellings are of a similar style, scale, mass and rhythm to those on Mill Road."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p>5.15</p> <p>29175</p> <p>29294</p>	Comment	Why can we not build along the western side of Middleton Way when we have legal access to Middleton Way in our deeds? Please could you clarify what development can take place on the Mill Road side frontage of Middleton Way i.e. development both sides of Middleton Way.	The creation of a new building line along the undeveloped western side of Middleton Way would change the existing rural character of the road and should be avoided. However, where it can be demonstrated that there will be no harm to the character of the road, development proposals will be considered. Paragraph 5.15 should be amended to be clear on what development is suitable for the western side of Middleton Way.	<p>Amend the first sentence of paragraph 5.15 to read:</p> <p>"The creation of a new building line along the undeveloped western side of Middleton Way would change the existing rural street scene and should be avoided."</p> <p>Add the following sentence to the end of paragraph 5.15:</p> <p>"Where it can be demonstrated that there will be no harm to the character of the road, any development proposals for the western side of Middleton Way should ensure that any new buildings are set back at least 14 metres from the edge of the road (which is the same distance as the existing dwellings along the eastern side of the road are set back from the road edge) and follow the same scale, massing and rhythm as the existing dwellings on the eastern side of the road."</p>

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*Representations*

*Nature Summary of Main Issue*

*Council's Assessment*

*Action*

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5.17



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29254	Comment	<p>I agree with the idea of sustainable living however I disagree with the allotment size. At the present time there is no allotment in this area where you can get a plot of 250 sqm. Although this is the traditional size dictating that all properties must have this size allotment is not sensible. For example if small "starter houses" or retirement houses are built then this size of allotment would be far too big and time consuming to maintain. Therefore I would suggest allowing some flexibility to allow smaller allotment areas.</p> <p>Another suggestion would be to allow the allotment plots to be in a communal area. This would allow greater linking between the ex-LSA and the rest of the village.</p> <p>Some plots certainly would not be able to have a 250 sqm allotment plot in the existing building plot.</p>	<p>The use of 250 sqm as the size for all allotments within the policy area is considered appropriate given the objective of the policy is to maximise sustainable living and any new houses are likely to be occupied by a number of different people during the lifetime of the dwelling. Allotments owned by South Cambridgeshire District Council vary from 70 sqm to 260 sqm depending on demand. However it is recognised that for some an allotment of this size may be unmanageable, therefore on all planning permissions for new dwellings permitted under Policy SP/11, a condition will be attached that will allow the dual use of the allotment area as either an allotment or garden without the need for planning permission to change the use. The condition is necessary as otherwise planning permission would be required to legitimately change the use of the land from allotment (agricultural) to garden (residential).</p> <p>Where there is not sufficient land for both the new dwelling and existing dwelling to each have a garden and allotment, the Council will be flexible on the provision and/or size of an allotment associated with the existing dwelling.</p> <p>It is important that the dedicated allotment areas of 250 sqm remain in the same landownership as the new dwelling that they are attached to. However, allotments for use by residents of the former LSA estate and village of Fen Drayton could be provided.</p> <p>Paragraphs 5.17 and 5.18 should be amended to reflect these suggested changes.</p>	<p>Delete the final sentence of paragraph 5.17, and amend the remainder of the paragraph to read:</p> <p>"To promote the principles of sustainable living which includes allowing any new residents to grow their own produce, each new dwelling should have a dedicated garden area and a separate dedicated area of land that could be used as an allotment of at least 250 sqm. All planning applications must clearly define each of these areas. The District Design Guide SPD sets out the required private amenity space for all types of dwellings; for example, dwellings in rural areas with three or more bedrooms should have a private garden space of at least 80 sqm. The traditional allotment size is approximately 250 sqm, and although they tend to vary in size depending on the size of the site and demand for allotments, this is considered an appropriate standard to use in this SPD consistent with its objectives to maximise opportunities for sustainable living."</p> <p>Add a new paragraph after paragraph 5.17 that reads:</p> <p>"It is recognised that an allotment of 250 sqm may be unmanageable for some occupants, therefore on all planning permissions for new dwellings permitted under Policy SP/11, a condition will be attached that will allow the dual use of the allotment area as either an allotment or garden without the need for planning permission to change the use. The condition is necessary as otherwise planning permission would be required to legitimately change the use of the land from allotment (agricultural) to garden (residential). For planning purposes, the dual use area will not form part of the residential curtilage; i.e. the residential curtilage will include only the dwelling and its garden and will exclude the dual use allotment / garden area."</p> <p>Amend the final sentence of paragraph 5.18 to read:</p> <p>"The existing dwelling should retain a dedicated</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
				garden area in accordance with the private amenity space guidelines set out in the District Design Guide SPD and where there is sufficient space, a separate dedicated allotment area."
29231	Support	Garden and allotment per dwelling is excellent.	Support noted.	No change.

### *Assessment of Sustainability*

29214 29276 - Fen Drayton Parish Council 29277 - Fen Drayton Parish Council	Comment	There is considerable variation of eligible footprints among the plots so if the eligible footprint were insufficient for a new dwelling one avenue would be to associate this with improvements or alterations in the current dwelling. This would allow aged or disabled people to maintain their family home. Why not allow the amalgamation of the eligible footprint into an existing dwelling if the dwelling is raised to level 5 in CfSH?	It is accepted that some landowners with small amounts of eligible footprint may wish to combine the footprint of their existing dwelling and their eligible footprint to create one new larger dwelling. The Council is willing to accept this provided that the development and design principles set out in Chapter 5 of the SPD are met and the combined footprint is used to create a new dwelling rather than an upgraded existing dwelling. The use of eligible footprint to extend the existing dwelling will not be permitted, as this cannot achieve the sustainability levels required by Policy SP/11. Based on the guidance set out in the SPD, any new dwelling created in this way would need to achieve CfSH Level 5 as the demolition of the existing dwelling would achieve a carbon reduction that should be recognised.  An additional paragraph should be added to the SPD outlining this allowable alternative.	Add a new paragraph after paragraph 5.24 that reads:  "The Council will accept development proposals that involve combining of the footprint of the existing house and any eligible footprint, provided that the resulting dwelling achieves CfSH Level 5. The Council will accept this less comprehensive carbon reduction standard, as the demolition of the existing dwelling will achieve a reduction in carbon emissions that should be recognised. Development proposals involving the use of eligible footprint to extend or upgrade the existing dwelling will not be permitted as they cannot achieve the sustainability levels required by Policy SP/11."
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### *5.24*

29278 - Fen Drayton Parish Council	Comment	This really means that the inhabitants either have to live elsewhere or in a temporary building on site. Would it not be preferable as well as more sustainable for the owners to live in the new dwelling while the old was being brought up to sustainable standards?	The improvement measures for the existing dwelling should not require the owners to move out while they are being undertaken.	No change.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29176	Comment	If we have footprint for more than one dwelling does the 10% cost refer to the complete new development or just one dwelling?	<p>The alternative proposal of allowing a new CfSH Level 5 dwelling in conjunction with improvements to the existing dwelling can only be applied to one new dwelling within a smallholding. If any further dwellings were proposed, these would be required to meet CfSH Level 6. Therefore the 10% cost refers to one dwelling.</p> <p>For clarity, amend paragraph 5.22 and 5.24.</p>	<p>Amend 5.22 to read:</p> <p>"It is recognised that achieving CfSH Level 6 is a challenging target for an individual new dwelling and also that the focus in Policy SP/11 entirely on the new sustainable buildings will leave the existing dwellings in stark contrast to the new sustainable buildings in terms of their energy efficiency and carbon emissions. Therefore in certain circumstances, where there is agreement between the Council and the applicant and as an alternative to achieving CfSH Level 6 on a proposed new dwelling, the Council will consider development proposals for a less comprehensive carbon reduction standard on the new dwelling provided that the proposals include retrofitting of energy efficiency solutions and/or renewable energy micro-generation technologies to the existing dwelling. This alternative can only be applied where an existing dwelling is included in the proposed development. For each existing dwelling a maximum of one new CfSH Level 5 dwelling can be proposed."</p> <p>Amend the third sentence of paragraph 5.24 to read:</p> <p>"As an indicative guide, the cost of the improvement measures to the existing dwelling should be equivalent to around 10% or more of the total cost of materials, equipment and construction of the new CfSH Level 5 dwelling."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Design Principles</i>				
29281 - Fen Drayton Parish Council	Comment	Paragraphs 5.42, 5.43, 5.44, 5.45: These are very fine objectives but how can these be translated into incentives such as carbon credits? Unless something concrete can be proposed these should not be part of a policy if it is to be definitive.	Both the Code for Sustainable Homes and the BREEAM non-residential standard consider waste, recycling and ecology in their assessments and therefore credits are awarded for the incorporation of measures related to: the minimisation, reuse and recycling of waste; and protection and enhancement of ecological features. To achieve the sustainability requirements set out in the SPD it will be necessary to achieve credits in these categories. It is important that any new development approved under Policy SP/11 considers environmental sustainability as a whole, rather than simply focussing on reducing carbon emissions. Both the Code for Sustainable Homes and BREEAM non-residential standard include categories and credits that assess the overall sustainability of the proposed building as well as ensuring carbon reduction.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Energy, Materials and Health &amp; Wellbeing</i>				
29245	Comment	<p>The SPD places emphasis on local micro-generation, giving photovoltaic (PV) systems as an example.</p> <p>At present, PV panels are very expensive and energy intensive to produce. It has been estimated that the energy cost of manufacture is equivalent to the amount of electricity that a panel will deliver in 10,000 hours of peak production (about 10 years under UK conditions). Currently PV panels are not recyclable.</p> <p>Ironically, the majority of PV hardware now available is manufactured in Asia, presumably in facilities largely powered by coal-fired generating stations.</p> <p>The economics of installing a domestic PV system is almost entirely dependent on the existence of very generous feed-in tariffs (effectively a tax rebate for those able to afford the high cost of installation). In the current economic climate it seems very unlikely that such levels of subsidy can be sustained.</p>	<p>Any development proposal designed to achieve CfSH Level 6 or BREEAM non-residential outstanding standard and the current zero carbon definition will need to include renewable energy technologies. The SPD allows for these to be provided on an individual or community scale.</p> <p>Information published by the Centre for Alternative Technology suggests that it will only take approx 2.5 years for a photovoltaic panel to payback its embodied energy (the energy used in its manufacture). Other research suggests that it could take up to 5 years. [source: <a href="http://info.cat.org.uk/questions/pv/what-energy-and-carbon-payback-time-pv-panels-uk">http://info.cat.org.uk/questions/pv/what-energy-and-carbon-payback-time-pv-panels-uk</a>]</p> <p>The Feed-in Tariff is a Government incentive to encourage the production and use of renewable energy, and is paid for by the energy supply companies rather than the Government. A greater take up of renewable energy technologies could result in changes to the Feed-in Tariff, however it could also result in lowering the costs of the renewable energy technologies.</p>	No change.
<hr/>				
<i>5.29</i>				
29279 - Fen Drayton Parish Council	Comment	<p>Wind turbines are probably not efficient in this location and will not co-exist with the character of the environment. CHP systems are coming on to the market and are likely to be making an impact in 2011.</p>	<p>The SPD recognises that wind turbines are unlikely to be viable in this location.</p> <p>Although micro CHP systems are being developed there are still issues to be resolved regarding the amount of heat produced. At a domestic scale, to generate enough electricity, CHP systems are producing more heat than that required.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
5.30 29280 - Fen Drayton Parish Council	Comment	The most efficient CHP systems are gas fired and there are a number community scale operations already in use. This only really works in a close knit community as distributing the heat over long distances is not efficient.	Agree. The SPD recognises that community CHP systems require very high levels of co-ordination and management to be effective.	No change.
5.35 29224	Support	Excellent so support.	Support noted.	No change.
5.37 29225	Comment	Do you have rainfall figures to support viability of this year round?	The Cambridge Water Cycle Strategy (Phase 2), which is currently being finalised, includes details on the practicalities of using water efficiency measures such as grey water recycling and rainwater harvesting. A draft version of the Strategy was considered at the New Communities Portfolio Holders Meeting on 14 December 2010 (item 4), see: <a href="http://scambs.moderngov.co.uk/ieListDocuments.aspx?CId=957&amp;MId=5149">http://scambs.moderngov.co.uk/ieListDocuments.aspx?CId=957&amp;MId=5149</a>  A reference to the Cambridge Water Cycle Strategy should be included in the SPD as a source of additional information.	Amend the final sentence of paragraph 5.38 to read:  "Information guides on greywater recycling and rainwater harvesting are available from the Environment Agency (see Chapter 6 for further details)."  Add the following sentence to the end of paragraph 5.38:  "Further details on the practicalities of using greywater recycling and rainwater harvesting are included in the Cambridge Water Cycle Strategy (Phase 2), which is due to be published in Spring 2011."  Add the Cambridge Water Cycle Strategy to the 'Further Information and Guidance' section of Chapter 6.
5.42 29197	Comment	Improving recycling levels should be addressed by the Government, particularly with regard to manufacturers and supermarkets.	Agree. As set out in the SPD, recycling levels beyond those already achieved in the district would require a behavioural change.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
5.44 29226	Comment	Reed-bed solution: please refer to objections received from Anglian Water with reference to Oaktree Road and Springhill Road when now defunct 'eco villages' plan was considered.	As set out in the SPD, the Council would welcome the incorporation of sustainable sewage management systems but only where such measures can be incorporated in accordance with the appropriate Codes of Practice and British Standards. Consultation with the relevant statutory consultees, including the Environment Agency, will be undertaken where any planning application includes a reed bed or other sustainable sewage management system.	No change.

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*Representations*

*Nature Summary of Main Issue*

*Council's Assessment*

*Action*

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*Transport and Roads*



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29152 - Swavesey Parish Council 29217 - Cambridgeshire Local Access Forum 29218 - Cambridgeshire Local Access Forum 29219 - Cambridgeshire Local Access Forum 29227 29269 - Fen Drayton Parish Council 29282 - Fen Drayton Parish Council	Comment	<p>Transport which in terms of contribution to CO2 emissions per person is as great as that caused by heating, cooling and lighting in buildings is not constrained in the SPD. There is very little point in having this section in the policy document. Sustainable travel solutions cannot be achieved because of infrastructure.</p> <p>When the Guided Busway opens, public transport links to the nearest main busway stops at St Ives and Swavesey should be provided to encourage residents to use public transport.</p> <p>If a cycle path was constructed between Fen Drayton and the Guided Busway stop, this would improve the sustainability of the village and the LSA initiative. It is stated that there will be no cycle racks at the stop. Suggest that these are provided to allow Fen Drayton residents to use the bus without having to have a bike that can pack away on the bus.</p> <p>If there is a possibility of increased traffic from the developments, provision should be made for footpaths or possibly dual cycle/foot paths, along the existing quiet roads of Middleton Way, Oaktree Road, Springhill Road and Park Lane which currently have no footpaths.</p>	<p>Although the supporting text accompanying Policy SP/11 indicates that any development proposal should introduce measures to restrict car use and promote sustainable forms of travel and commuting, it is recognised that the physical location of the former LSA estate and its existing sustainable transport choices make this policy requirement more difficult to implement when compared to other locations.</p> <p>To require measures such as restrictions on parking or the number of trips would not be reasonable in this location. Therefore to meet the requirements of the policy, any new developments should promote opportunities that would allow their occupants to voluntarily reduce car use and increase their use of sustainable forms of travel. It is hoped that any new occupants attracted to the policy area as a result of its sustainability credentials will make use of the opportunities for sustainable travel.</p> <p>Due to the importance of transport within the concept of sustainable living, the Council will prioritise contributions for improving sustainable transport infrastructure.</p>	<p>Amend the second sentence of paragraph 5.48 to read:</p> <p>"However, the physical location of the former LSA estate at Fen Drayton and its existing sustainable transport choices make this policy requirement more difficult to implement in this location than in other locations with good quality public transport."</p> <p>Delete the third and forth sentences of paragraph 5.48.</p> <p>Add the following sentence to the end of paragraph 5.48:</p> <p>"All development proposals should consider the requirements of Policies TR/1, TR/2, TR/3 and TR/4, as well as the guidance set out in this SPD."</p> <p>Combine paragraphs 5.49 and 5.50, and amend to read:</p> <p>"Measures to restrict car use, such as restrictions on parking or the number of trips, would not be reasonable in this location. Therefore to meet the requirements of Policy SP/11, any new developments should facilitate and promote opportunities that would allow the new occupants to reduce their car use and increase their use of sustainable forms of transport. This could be achieved by:</p> <ul style="list-style-type: none"> <li>* designing the car parking so that it does not dominate the appearance of the site;</li> <li>* providing secure cycle parking;</li> <li>* providing a dedicated space to allow home-working regularly or intermittently;</li> <li>* initiating car sharing schemes that allow residents to share car journeys to / from work and other locations;</li> <li>* developing car and cycle club schemes that allow residents to hire a pool car or bicycle;</li> <li>* creating or upgrading pedestrian and cyclist friendly routes to encourage walking and cycling within the development and to nearby locations;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>* developing or improving community transport</li> </ul>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
				schemes and public transport services."  Insert the following paragraph below paragraph 5.50:  "Where an individual development cannot provide opportunities for the promotion of sustainable transport on site, financial contributions for the provision of offsite opportunities will be sought. Due to the importance of transport within the concept of sustainable living, the Council will prioritise contributions for improving sustainable transport infrastructure."
29199 - Highways Agency	Comment	<p>The Highways Agency is not opposed in principle to the development however it wishes to be assured that any impacts would not leave the A14 any worse off than would normally be the case, both in safety and congestion terms.</p> <p>The proposed A14 improvement scheme, which would have effectively bypassed this site, was withdrawn in October 2010. Given this, the location and size of the site and its current poor public transport links it could prove challenging to demonstrate that any proposed development in this location could leave the A14 no worse off.</p>	<p>As stated by the Highways Agency, the impacts on the A14 of the proposed development are likely to be marginal or negligible. Although the Council cannot prevent the use of the A14, it is hoped that any new occupants attracted to the policy area as a result of its sustainability credentials will make use of the opportunities for sustainable travel.</p> <p>It is not reasonable to request the submission of a Transport Assessment where the development proposal relates to an individual or small group of dwellings. Therefore, the Council will only seek Transport Assessments where the development proposal meets the criteria set out in Policy TR/3.</p>	No change.
29157 - Cambridgeshire County Council	Object	<p>The document confirms that the vehicle parking standards should reflect those contained within TR/2 of the DPD. This suggests an average of 1.5 spaces per dwellings across the district (up to a maximum of 2 per 3 or more bedrooms in poorly accessible areas).</p> <p>In an essentially rural District such as South Cambs a minimum of 2 spaces per dwelling (excluding the garage if less than 7.0m x 3.0m internal dimensions) would be more appropriate.</p>	<p>The adopted planning policy for car parking standards in the district remains as Policy TR/2. As a result of changes to national planning policy it is recognised that the Council's car parking standards will need to be reviewed as part of the review of the Core Strategy and Development Control Policies DPDs.</p> <p>Although car use is likely to remain the preferred method of transport within the policy area, it is hoped that any new occupants attracted to the policy area as a result of its sustainability credentials will make use of the opportunities for sustainable travel.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
5.48 29151 - Swavesey Parish Council	Comment	Any development of the estate could potentially increase traffic use of Rose & Crown Road and Boxworth End, Swavesey. Although the closest A14 junction to the site is at Fenstanton, some residents/visitors may use the Swavesey junction and therefore Boxworth End and Rose & Crown Road to travel to/from Fen Drayton. Any implications relating to this should be considered.	<p>The Council recognise that any new development within the policy area could result in increased traffic on the surrounding roads. However, the County Council as highway authority does not object and it is most likely that any development proposals will come forward on a piecemeal basis over a number of years and therefore any increase in traffic will be gradual.</p> <p>Although the Council cannot control car use from any new developments within the policy area, it is hoped that any new occupants attracted to the site as a result of its sustainability credentials will make use of the opportunities for sustainable travel e.g. use of the Guided Busway and other local bus services.</p>	No change.
29138 - Sustrans (East of England)	Comment	This paragraph should be wholly optimistic about the possibility of using bus services from this location, given that the Guided Busway (between 1.5km and 3.5km from the existing houses) will be open by the time of the adoption of the document. This will give a very high quality and frequent service. Its Fen Drayton stop is within easy cycling distance, and could be given sheltered and secure cycle parking. The road to it could be improved and given surface-mounted solar stud illumination.	As a result of considering the representations received, the Council have amended the 'Existing Transport and Access' section (Chapter 3) to reflect the better existing public transport service than previously reported and also to include a reference to the guidance in PPG13 regarding suggested distances at which walking and cycling can replace car journeys. The Council have also amended the 'Transport and Roads' section (Chapter 5) to improve the guidance on reducing car use.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Delivery</i>				
29216 - Cambridgeshire Local Access Forum 29285 - Fen Drayton Parish Council	Comment	<p>Potential for 50 to 70 new dwellings would significantly increase the size of the village. This increase could be accommodated but would need planning and investment in the community infrastructure. The SPD should indicate how such investment could be obtained as a proportion of the proposed development.</p> <p>We note that provision for affordable housing is a serious omission from the document. Any possible opportunity for the creation of other routes away from traffic, such as recreational circular routes, should be considered.</p>	<p>As stated in the SPD, the document is not intended to be read as a standalone document. All development proposals will be expected to meet the requirements of all planning policies set out in the Local Development Framework relevant to the development proposal; this includes provision of affordable housing, open space, community facilities, cycle and pedestrian routes and other appropriate infrastructure.</p> <p>For clarity amend paragraph 5.54 to specifically refer to the provision of affordable housing and other infrastructure.</p>	<p>Amend paragraph 5.54 to read:</p> <p>"All planning applications for development proposals within the policy area will be considered against Policy SP/11 together with the additional advice and guidance set out in this SPD. All development proposals will also be required to meet the criteria set out in other relevant policies of the Local Development Framework, such as Policies DP/3 (development criteria) and DP/4 (infrastructure and new developments) which require all development proposals to make proper provision to meet their needs and prevent unacceptable adverse impacts. To achieve this, it may be necessary to provide infrastructure such as affordable housing, educational facilities, community facilities, public open space, routes for pedestrians, cyclists or equestrians, or public and community transport; or a financial contribution towards off-site provision of such infrastructure. Development viability will be a material consideration when the Council assesses the implications of all relevant policies."</p>
29232	Comment	Should not go back to Land Settlement Association (private ltd company) or Chartist (political) ideas.	The Council cannot control the mechanisms used to deliver any development proposals permitted under Policy SP/11; it will be for the landowner and developer to agree these mechanisms.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Community Involvement in Sustainable Living</i>				
29212	Comment	Deprecate separation of LSA from village community implied throughout policy, except at end, where onus is placed on village leadership to make things work. The existing village should also have been included explicitly as part of the consultation process. Existing village should also be incentivised to buy in to the development. For example, consideration could be given in any redevelopment to improve village infrastructure through provision of a village shop, or a surgery, solar panels for the village hall or church, warden-based accommodation for elderly residents, etc.	<p>The village and the former LSA estate are very separate in planning terms, and Policy SP/11 specifically relates to the former LSA estate. The SPD is intended to provide advice and guidance to applicants on how to develop a proposal that complies with Policy SP/11. Wider community involvement and village leadership are not requirements of gaining planning permission, however, good practice examples and experience elsewhere has shown that the involvement of the wider community can result in higher levels of sustainable living and environmental sustainability being achieved. It will be for the Parish Council and the residents and businesses of Fen Drayton to decide whether to promote sustainability in the parish and work in partnership with any development proposals that come forward within the former LSA estate.</p> <p>Throughout the preparation of the SPD, the village of Fen Drayton have been informed of work being undertaken through articles in the South Cambs Magazine, Fen Drayton Magazine, press releases and correspondence with the Parish Council. The public consultation event was publicised in the village and all documents were available to view in the Three Tuns.</p> <p>All development proposals are required to meet the criteria set out in other relevant policies of the LDF, this includes the provision of any infrastructure required to meet the needs of the development and prevent unacceptable adverse impacts on the surrounding environment and community. Therefore, where appropriate and viable, any new development permitted under Policy SP/11 will be required to make the necessary contributions.</p>	<p>Amend paragraph 5.54 to read:</p> <p>"All planning applications for development proposals within the policy area will be considered against Policy SP/11 together with the additional advice and guidance set out in this SPD. All development proposals will also be required to meet the criteria set out in other relevant policies of the Local Development Framework, such as Policies DP/3 (development criteria) and DP/4 (infrastructure and new developments) which require all development proposals to make proper provision to meet their needs and prevent unacceptable adverse impacts. To achieve this, it may be necessary to provide infrastructure such as affordable housing, educational facilities, community facilities, public open space, routes for pedestrians, cyclists or equestrians, or public and community transport; or a financial contribution towards off-site provision of such infrastructure. Development viability will be a material consideration when the Council assesses the implications of all relevant policies."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29169 - LSA Owners Group	Comment	The inclusion of the wider community should be considered a positive aspect with regard to proposal on site. However, it should not be a condition of planning permission or development.	<p>Agree. It is not the intention that wider community involvement be a condition of achieving planning permission. Involvement of the wider community is suggested as a method of achieving individual and community behaviour change in association with the provision of highly energy efficient buildings, which together will allow a greater shift towards the achievement of low-carbon living.</p> <p>For clarity amend paragraph 5.56 to specify that community involvement is not a requirement in achieving planning permission.</p>	<p>Amend the first sentence of paragraph 5.56 to read:</p> <p>"Although not a requirement in achieving planning permission, what will raise any development proposals submitted under Policy SP/11 to a higher 'experimental' and 'groundbreaking' level are opportunities to achieve personal behaviour change and include wider interaction with the local community."</p>
29228	Comment	Lifestyle and behavioural 'blue sky' thinking should not fall foul of Human Rights legislation re the right to a private life. Some parts of guidance are unacceptable because of attempt to micro-manage lifestyle.	Making changes to lifestyle and behaviour and implementing the lifestyle aspects of sustainable living are not a condition of achieving planning permission. The planning system can only directly control the physical environment. However, if occupiers of the new buildings fully embraced sustainable living in its widest form, the development would have greater environmental benefits.	No change.
<i>5.56</i>				
29283 - Fen Drayton Parish Council	Comment	The final sentence seems to have some wording missing or it needs some further explanation.	Agree. The paragraph is intended to set out that zero carbon buildings on their own are not enough to secure a major shift towards low-carbon living and that they need to be accompanied by a shift in personal behaviour. Paragraph 5.56 should be amended to clarify this.	Delete the final sentence of paragraph 5.56.
<i>5.59</i>				
29284 - Fen Drayton Parish Council	Comment	We are not sure that this statement is capable of being tested.	This paragraph is an aspiration as to what could be achieved if the residents of the former LSA estate and the rest of the parish of Fen Drayton worked together to deliver Policy SP/11 and its associated benefits.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>Appendix 3: Maps of Buildings according to SCDC Definitions</i></b>				
<b><i>6 Mill Road</i></b>				
29293	Object	I have a concrete base attached to the converted/shed garage which in land settlement days had a packing shed on which I think should be included in the footprint. I can get an aerial photo showing what was on site in the LSA period.	Hardstandings that remain from earlier buildings are specifically excluded from the definition of a building as set out in paragraph 4.6 and therefore cannot be included within the eligible footprint. The hardstanding should therefore remain excluded from the eligible footprint.	No change
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<b><i>9 Mill Road</i></b>				
29172	Object	Building 20 at 9 Mill Road classed as NOT ELIGIBLE. Used as a Chemical Store since mid 1990s. This is hardly a temporary building.	Building 20 does not meet the definition of an eligible building as set out in paragraph 4.6 as it can be moved around the site or removed from the site, and is not physically attached to the ground. It is a storage container, and although not temporary in the terms of the length of time it has been on site, it is temporary in that it is easily moveable around the site or off site. The classification of building 20 should remain unchanged.	No change.
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<b><i>40A Middleton Way</i></b>				
29295	Comment	We also wish to take up with the Council the issue of the removal of the restriction on our client's occupation of his dwelling, but we have been advised that this should be carried on outside the consultation on this document.	The business of keeping and training greyhounds and the occupation of 40a Middleton Way are tied by an occupancy condition. Policy SP/11 and the SPD relate to the reuse or redevelopment of former agricultural buildings within the former LSA estate. The consideration of removing the occupancy condition relating to 40a Middleton Way is therefore not within the scope of Policy SP/11 and the SPD. To pursue the removal of the occupancy condition, discussions would need to take place with the Development Control team within the Planning Department.	No change.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29154	Object	Calculation of eligible buildings should be increased to include those areas and buildings specified in recent correspondence, some of which have already been agreed by the Council.	<p>Following a revisit to 40A Middleton Way, it is agreed that buildings 62 and 63 should be amended to eligible buildings. Additional buildings were surveyed and their eligibility was also assessed.</p> <p>Building 62 should be considered as an eligible building as it meets both the definition of a building as specified in paragraph 4.6 and was previously used for agricultural purposes (goat / animal shed).</p> <p>Building 63 should be considered as an eligible building as it meets both the definition of a building as specified in paragraph 4.6 (although the roof is missing, it is in the process of being replaced) and was previously used for agricultural purposes (agricultural workshop).</p> <p>The additional buildings surveyed were a chicken shed, a sheep shed and a pump house. The chicken shed and sheep shed are not considered to be eligible due to their temporary nature - they can be easily moved around the site or off site - and therefore they do not meet the definition of a building as set out in paragraph 4.6. The chicken shed and sheep shed should be included on the maps in the SPD as non-eligible buildings.</p> <p>In considering the representations received, the Council has revised its stance on plant ancillary to the operation and use of the glasshouses, and agreed that pump houses and boiler houses should be treated as eligible buildings. Therefore the pump house should be treated as an eligible building as it meets the Council's revised definition of an eligible building.</p> <p>Appendices 2 and 3 need to be updated to reflect these changes.</p>	<p>Amend Appendices 2 and 3 to record building 62, building 63 and the pump house at 40a Middleton Way as eligible buildings.</p> <p>Amend Appendices 2 and 3 to record the additional non-eligible buildings surveyed at 40a Middleton Way.</p>



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29188	Object	<p>Although we appreciate your calculations of the eligible buildings, we feel your calculations of the pig shed [building 59] does not reflect its true dimensions. As you can see from the enclosed photograph the building was originally bigger. Although some of the structure, including the roof is missing (this was due to adverse weather conditions / decay over time and made safe to prevent further deterioration and safety), the footings dimensions remain. Jenny has the original measurements, as well as the eligibility measurements, so you can compare. We would much appreciate it, if you would reconsider and use the original measurements.</p>	<p>The measurements for building 59 reflect the portion of the building that is eligible. Only the portion of the building with three or more complete walls and a roof meets the definition of an eligible building as set out in paragraph 4.6. Hardstandings and buildings with less than three walls do not meet the definition of a building. For consistency with the definition, the measurements for building 59 should remain unchanged.</p>	No change.
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<i>41 Middleton Way</i>				
29204	Object	<p>I object to the allocation of footprint for 41 Middleton Way.</p> <p>Two original hardstandings remain on which are sited one large building [building 54] and another 'newer' building [building 57] which replaced the original building that was falling down and dangerous. It now provides a secure building for the storage of equipment used to work the land.</p> <p>The original buildings on the plot were both used for pigs and chickens and are shown on the attached map (document 5).</p> <p>You have deemed that only the extent of the original remaining building can be included in the footprint.</p>	<p>Hardstandings that remain from earlier buildings are specifically excluded from the definition of a building as set out in paragraph 4.6 and therefore cannot be included within the eligible footprint.</p> <p>Replacement buildings can only be included as eligible buildings where they have been legitimately replaced under permitted development rights or through a planning permission. The General Permitted Development Order (GPDO) states that any replacement agricultural buildings on smallholdings of less than 5 ha require planning permission. As this smallholding is less than 5 ha and the replacement building (building 57) was not authorised through a planning permission, the building is not legitimately agricultural.</p> <p>The hardstandings and building 57 should therefore remain excluded from the eligible footprint.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>42 Middleton Way</i> 29292	Object	<p>The former piggery and outhouse on land adjacent to 42 Middleton Way should both be identified as eligible agricultural buildings.</p> <p>It is contended that there is no reason why these structures should not be identified as eligible agricultural buildings as other similar structures have been identified.</p>	<p>Following a visit to land adjacent to 42 Middleton Way, it is agreed that the former piggery building should be classified as an eligible building as it meets both the definition of a building as specified in paragraph 4.6 and was previously used for agricultural purposes (piggery).</p> <p>The lean-to extension to the piggery does not meet the definition of an eligible building as set out in paragraph 4.6 as it only has two complete walls and a roof rather than three or more walls and a roof.</p> <p>In considering the representations received, the Council has revised its stance on plant ancillary to the operation and use of the glasshouses, and agreed that pump houses and boiler houses should be treated as eligible buildings. Therefore the pump house / outhouse should be treated as an eligible building as it meets the Council's revised definition of an eligible building.</p> <p>Appendices 2 and 3 need to be updated to reflect these changes.</p>	<p>Amend Appendices 2 and 3 to record the piggery and pump house / outhouse on land adjacent to 42 Middleton Way as eligible buildings.</p> <p>Amend Appendices 2 and 3 to record the extension to the piggery on land adjacent to 42 Middleton Way as a non-eligible building.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>43 Middleton Way</i>				
29185	Object	In response to phone conversation. Please find enclosed plan of 43 Middleton Way. Trusting its simple to understand. [Suggests inclusion of pump house, water tank, extensions to piggery, peat and compost storage area, and boiler house.]	<p>Following a revisit to 43 Middleton Way, it is agreed that the extensions to the piggery should be included where they meet the definition of a building as set out in paragraph 4.6 (i.e. they have 3 or more walls and a roof).</p> <p>The peat and compost storage area (building 53) does not meet the definition of an eligible building as set out in paragraph 4.6 as it only has two walls and a roof rather than three or more walls and a roof.</p> <p>In considering the representations received, the Council has revised its stance on plant ancillary to the operation and use of the glasshouses, and agreed that pump houses and boiler houses should be treated as eligible buildings. However, the Council still considers that water tanks would not meet the definition of an eligible building and should therefore remain excluded from the eligible footprint. Therefore the boiler house and pump house (previously excluded from the eligible footprint) should be treated as eligible buildings as they meet the Council's revised definition of an eligible building, however the water tank should remain excluded from the eligible footprint.</p> <p>The dimensions and footprint of building 50 (agricultural building) need to be amended.</p> <p>Appendices 2 and 3 need to be updated to reflect these changes.</p>	Amend Appendices 2 and 3 to record the extensions to the piggery, pump house and boiler house at 43 Middleton Way as eligible buildings and correct the dimensions and footprint of building 50.
<i>44 Middleton Way</i>				
29198	Object	All buildings erected for horticultural purposes and no longer required due to retirement should be included. Building 47: originally used for blocking machine and equipment. Required recladding so was moved to a site by the piggery. In the process of being reclad.	<p>Building 47 should be considered as an eligible building as it meets both the definition of a building as specified in paragraph 4.6 (although the walls are missing, they are in the process of being replaced) and was previously used for agricultural purposes.</p> <p>Appendices 2 and 3 need to be updated to reflect these changes.</p>	Amend Appendices 2 and 3 to record building 47 as an eligible building.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>45 Middleton Way</i>				
29288	Object	<p>We have lived on the LSA estate for 40 years. We are disappointed and perplexed as to why one of the buildings has not been categorised as a former agricultural building (highlighted yellow on the attached map).</p> <p>This enclosed wooden building with a concrete floor (not a glasshouse) was formerly the house for a large horticultural boiler used to provide heating for crops in the winter. In later years, we sold the boiler itself and used the building as a packing shed.</p>	<p>In considering the representations received, the Council has revised its stance on plant ancillary to the operation and use of the glasshouses, and agreed that pump houses and boiler houses should be treated as eligible buildings. However, the Council still considers that water tanks would not meet the definition of an eligible building and should therefore remain excluded from the eligible footprint.</p> <p>Therefore the boiler house (previously excluded from the eligible footprint) should be treated as an eligible building as it meets the Council's revised definition of an eligible building.</p> <p>Appendices 2 and 3 need to be updated to reflect this change.</p>	Amend Appendices 2 and 3 to record the boiler house at 45 Middleton Way as an eligible building.
<i>27 Cootes Lane</i>				
29289	Object	<p>Building 87: built in 1967 as a packing and storage shed for lettuces, and used in the 1980s to store flower boxes. Planning permission granted for the building to be replaced with a garage.</p> <p>Building 82: at the end of the piggery was a generator shed for power to the holding.</p> <p>Building 83: built in 1985 to store my rotovator and tractor as I had no other place to put them as the two packing sheds were full with chrysanthemums.</p> <p>Building 86: planning permission granted for this building to be used for the store and sale of hay. The hay was stored in the shed first to cool from the fields and then held until the market price was right because we produced high quality hay it could be sold at a premium. I have had 450+ bales of hay off the field.</p>	<p>Following consideration of the evidence submitted, agree that buildings 83 and 86 meet the definition of an eligible agricultural building as set out in Chapter 4, therefore the buildings should be classified as eligible.</p> <p>However, as set out in Chapter 4, only those buildings that meet all the eligibility criteria can be included as eligible buildings. The generator shed at the end of building 82 was not present at 28 January 2010, and therefore cannot be included as an eligible building. The original agricultural building (building 87, packing shed) has now been replaced by a domestic garage through a planning application, therefore this building is no longer legitimately agricultural and therefore cannot be included as an agricultural building.</p>	Amend Appendices 2 and 3 to record buildings 83 and 86 as eligible buildings.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>28 Cootes Lane</i>				
29139	Object	Because of their history of use as agricultural buildings, buildings 90 and 91 should be reclassified as eligible.	<p>Following consideration of the evidence submitted, agree that building 90 meets the definition of an eligible agricultural building as set out in Chapter 4, therefore the building should be classified as eligible. However, disagree that building 91 meets the definition of an eligible building as set out in paragraph 4.6, as it only has 2 walls and a roof, therefore the building should remain classified as a non-eligible building.</p> <p>Appendices 2 and 3 need to be updated to reflect this change.</p>	Amend Appendices 2 and 3 to record building 90 as an eligible building.
<i>29 Cootes Lane</i>				
29200	Object	<p>Buildings 92 and 93 identified as eligible agricultural buildings are different sizes to those shown in the document.</p> <p>Building 92 measures 9.25 x 6.13 = 56.70 sqm (55.75 sqm in the document).</p> <p>Building 93 measures 12.17 x 6.47 = 78.74 sqm (78.69 sqm in the document).</p>	<p>The Council are confident that the measurements recorded on the site visit are correct, however as the required changes only amount to an additional 1 sqm, the Council accept the revised measurements.</p> <p>Appendices 2 and 3 need to be amended to reflect the revised measurements.</p>	Amend Appendices 2 and 3 to reflect the revised measurements for buildings 92 and 93.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
29201	Object	<p>There were and still are structures which were exclusively for agricultural use and would not exist but for that use but are now not required for that purpose. The inclusion of some of these structures would allow a development of a size that would make Code 6 and beyond viable.</p> <p>I request that the following (also shown on the attached plan) be surveyed and because all of these were exclusively for the operation of the holding I submit them for consideration as eligible footprints:</p> <ol style="list-style-type: none"> <li>1. water tank</li> <li>2. hardstandings exclusively for the delivery and collection of produce</li> <li>3. brick footing of a structure</li> <li>4. a shed, that although was a substantial structure has subsequently been demolished for safety reasons</li> </ol>	<p>In considering the representations received, the Council has revised its stance on plant ancillary to the operation and use of the glasshouses, and agreed that pump houses and boiler houses should be treated as eligible buildings. However, the Council still considers that water tanks would not meet the definition of an eligible building and should therefore remain excluded from the eligible footprint.</p> <p>Hardstandings that remain from earlier buildings and buildings with less than three walls or no roof are specifically excluded from the definition of a building as set out in paragraph 4.6 and therefore hardstandings and brick footings cannot be included within the eligible footprint.</p> <p>As set out in paragraph 4.3, only buildings that existed at the time that the policy was adopted (28 January 2010) can be included as eligible buildings.</p> <p>Therefore the water tank, hardstandings, brick footings and demolished shed should remain excluded from the eligible footprint.</p>	No change.
<hr/>				
<i>33 Cootes Lane</i>				
29236	Object	<p>For several years in the late 1990s I worked the land as a commercial nursery producing mainly salad crops.</p> <p>I now find that because I referred to a building as a boiler house this has not been included as an eligible building. The building has since been used as a storage facility for small tools and sundry materials. This was an agricultural building that was converted to a different agricultural use.</p> <p>The water tower was converted for extra storage of sundry growing items.</p> <p>Both the structures mentioned should be included as eligible agricultural buildings. The policy clearly only excludes glasshouses.</p>	<p>In considering the representations received, the Council has revised its stance on plant ancillary to the operation and use of the glasshouses, and agreed that pump houses and boiler houses should be treated as eligible buildings. However, the Council still considers that water tanks would not meet the definition of an eligible building and should therefore remain excluded from the eligible footprint.</p> <p>Therefore the boiler house (previously excluded from the eligible footprint) should be treated as an eligible building as it meets the Council's revised definition of an eligible building, however the water tank should remain excluded from the eligible footprint.</p> <p>Appendices 2 and 3 need to be updated to reflect this change.</p>	Amend Appendices 2 and 3 to record the boiler house at 33 Cootes Lane as an eligible building.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>54 Park Lane</i>				
29159	Object	This objection relates to the exclusion of building 97 from those considered eligible under the criteria contained in Policy SP/11. The current building was erected as an implement store in accordance with planning permission granted under SCDC reference S/0343/00/F. The new implement store replaced an earlier implement store on the same site. As the current building was originally constructed (with planning permission) as an agricultural building and has not been the subject of a planning permission for change of use then it should be considered eligible under the criteria contained within the SPD and in accordance with policy SP/11.	<p>For a building to be eligible, it must either have been:</p> <ul style="list-style-type: none"> <li>* constructed for agricultural purposes and not formally changed to another use; or</li> <li>* constructed for another purpose and formally changed to agricultural or horticultural use.</li> </ul> <p>The original buildings on the site of building 97 were agricultural buildings, however, the documentation submitted with planning application S/0343/00 suggests that at the time of the planning application, the site was not in agricultural or horticultural use. Therefore the new building permitted under S/0343/00 is not agricultural and so cannot be classified as an eligible building.</p>	No change.
<i>16 &amp; 16A Oaktree Road</i>				
29189	Object	<p>We wish to comment on the exclusion of the agricultural building [building 101] which was surveyed on our land and which was previously used as a goat shed for milk production. Please find attached photographs in support / proof of the use of this building. Upon this evidence we now hope that the building will be considered as eligible. If you require any witness statements in support of the use of this building this can be arranged.</p> <p>We would also like to make reference to the former boiler house which would need to be surveyed if there is a change of policy on the excluded buildings.</p>	<p>Following consideration of the evidence submitted, agree that building 101 meets the definition of an eligible agricultural building as set out in Chapter 4, therefore the building should be classified as eligible.</p> <p>In considering the representations received, the Council has revised its stance on plant ancillary to the operation and use of the glasshouses, and agreed that pump houses and boiler houses should be treated as eligible buildings. Therefore the boiler house (previously excluded from the eligible footprint) should be treated as an eligible building as it meets the Council's revised definition of an eligible building.</p> <p>Appendices 2 and 3 need to be updated to reflect these changes.</p>	Amend Appendices 2 and 3 to record building 101 as an eligible building.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>24 Oaktree Road</i></p> <p>29290</p>	Object	<p>My open sided storage shed [building 106] was included as eligible footprint on the map discussed at the workshop in September 2010. However, it has now been changed to not eligible in the draft SPD. As an open sided storage shed present on 28 January 2010, it meets the criteria for a "building" and for an agricultural building. I am therefore requesting the reasons why this storage shed is now not deemed eligible and also for its re-instatement.</p> <p>The building does have 3 walls otherwise the 4 goats would escape (see attached photograph). Also attached is a copy of the land registry map from when 24 Oak Tree Road was sold at the closure of the LSA to prove how long the building has been there.</p>	<p>Following consideration of the evidence submitted, agree that building 106 meets the definition of an eligible building as set out in paragraph 4.6, as it has 3 walls and a roof and is physically attached to the ground, therefore the building should be re-classified as eligible.</p> <p>Appendices 2 and 3 need to be updated to reflect these changes.</p>	Amend Appendices 2 and 3 to record building 106 as an eligible building.



# Supporting Documents

## Public Participation Report

Supporting Documents

Habitat Regulations Assessment Statement

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***Representations***

***Nature Summary of Main Issue***

***Council's Assessment***

***Action***

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### ***Supporting Documents***

#### ***Habitat Regulations Assessment Statement***

29221 - Cambridgeshire Local  
Access Forum

Comment

The Habitat consultation has too high a threshold. It is considering only those regulations imposed by the European Union and does not take into consideration local nature reserves or the equivalent.

The Habitats Directive establishes the requirement to undertake a Habitat Regulations Assessment to assess the likely impacts of any proposed development on Natura 2000 or RAMSAR sites. The Habitat Regulations Assessment is not required to considered sites of local environmental importance.

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No change.



## **Appendix 2: Schedule of Further Written Responses, the Council's Response and Changes to the SPD**

### **54 Park Lane [building 97]: classification of an implement shed**

Summary of Representation: The landowner argues that the current building was erected as an implement store in accordance with planning permission S/0343/00, and that the building was constructed for agricultural purposes, although it is now used for purposes ancillary to the existing dwelling. He also argues that the current use of the land as residential garden land, rather than agricultural / horticultural land, is no different to the other plots within the former LSA estate.

Council's Assessment: Following research and consideration of the evidence, the officer assessment is that the building is not a former agricultural building and therefore not eligible. The application form submitted as part of S/0343/00 states that at the time of the planning application, the use of the buildings / land was "garden". The aerial photographs from 1998, 2003 and 2008 also show that within the curtilage of 54 Park Lane the land is garden (grass) and that there is no delineation between this and any agricultural / horticultural use. Therefore the implement shed cannot be considered to be agricultural, as the site was in residential use at the time of the planning application. The planning statement submitted as part of S/0485/10 (a planning application for the conversion of the building to a dwelling) also confirms that "the existing buildings are ancillary to the main dwelling on the site, being buildings erected within the curtilage of the dwelling house".

It is recognised that other plots within the former LSA estate have former agricultural buildings that were once surrounded by agricultural land, but that now the land is used as residential garden land. However, at 54 Park Lane, the evidence suggests that the change in the use of the land to garden occurred before the construction of building 97 [the replacement implement shed] rather than after, and therefore the building cannot be classified as eligible unlike other buildings within the former LSA estate.

Action: As the implement shed [building 97] constructed at 54 Park Lane under S/0343/00 is not considered to be agricultural, it cannot be classified as an eligible building. The classification of building 97 should therefore remain as non-eligible.

### **33 Cootes Lane: classification of a converted water tank**

Summary of Representation: The landowner argues that by converting his water tank into a storage building, through cutting a hole in the side and replacing the roof liner with a more substantial covering, it should be classified as an eligible building.

Council's Assessment: Following research and consideration of the evidence, the officer assessment is that the converted water tank should be considered eligible as the conversion of the water tank over 10 years ago means that it was no longer a water storage container when Policy SP/11 was adopted in January 2010, and can therefore be considered differently to all the unconverted water tanks. All unconverted water tanks are considered to be non-eligible buildings as they are

purpose built containers for the storage of water, and containers are specifically excluded from being classified as eligible buildings by the definitions set out in the SPD.

Action: The officer assessment has changed as a result of the discussions held and evidence submitted following the New Communities Portfolio Holder Meeting on 8 March 2011. The SPD has been amended to include the converted water tank at 33 Cootes Lane as an eligible building.