

## Comments on Draft Sustainability Scoping Report

In total 34 comments were made by 11 consultees, including two of the three SA Bodies. The comments were wide ranging but can be summarised as being concerned with:

- Recent national developments that have implications for planning, including the National Planning Policy Framework, the Localism Act and the Community Infrastructure Levy
- Plans or programmes that were not referenced
- Public engagement in the Sustainability Appraisal and plan making process
- Links with other aspects of the plan making process, including the Habitats Regulations Assessment
- Economic development, including the Alconbury Airfield Enterprise Zone
- Coverage of topics including ancient woodland, heritage assets, flooding, crime and community facilities
- Minor textual changes to aid clarity

The following table gives all comments in full, organised in document order. Where the 'Section/ Paragraph Number' is blank the comment is on the whole document. SA bodies are identified in the table.

Name, Organisation	Section/ Paragraph Number	Comment ID	Type of comment	Comment
Ms J Bowd Holywell-cum- Needingworth Parish Council		<a href="#">SASR3</a>	Have Observations	The contents of the document had been noted and that the Council wished to be kept informed
Rose Freeman The Theatres Trust		<a href="#">SASR13</a>	Have Observations	We support this tidy comprehensive Scoping Report especially for its cultural content under the sub-heading Health and Well-being to promote the accessibility of cultural activities, but have a few quibbles. (See comments against relevant consultation points)
Janet Nuttall Natural England (SA Body)		<a href="#">SASR14</a>	Have Observations	<p>We are pleased to be able to provide comments.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England promotes the use of our guidance document 'Environmental Quality in Spatial Planning', produced jointly with the Environment Agency and English Heritage, and would recommend that reference is made to this document during the preparation of the new local plan. In particular, Supplementary File 14 provides a checklist to be used during the development of local development frameworks. The guidance can be found at the following link:</p> <p><a href="http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/default.aspx">http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/default.aspx</a></p> <p>General Comments</p> <p>We welcome the efforts made by Huntingdonshire District Council in preparing the draft Scoping Report. We are satisfied at present that the Sustainability Appraisal of the Local Plan is proceeding in a proper, logical and comprehensive manner.</p>

Name, Organisation	Section/ Paragraph Number	Comment ID	Type of comment	Comment
				<p>Approach to SA</p> <p>We are pleased to see recognition of the Government's objectives for sustainable development.</p> <p>We welcome the reference made to the other assessments, particularly Strategic Environmental Assessment (SEA); however, further discussion should be included on the separate Habitats Regulations Assessment (HRA) process and the integration between the SA/SEA and HRA processes.</p> <p>For example, evidence gathered for the HRA on European sites, and the conclusion of the HRA should inform the SA.</p> <p>Scoping Process</p> <p>We strongly support the topic based approach taken and are pleased to see consideration of issues of importance to Natural England including landscape character, the protection and enhancement of biodiversity and the delivery of green infrastructure. We also welcome consideration of climate change mitigation and adaptation. We would advise that consideration should also be given to the protection and enhancement of geodiversity; sites such as Warboys Claypit SSSI are designated on account of their nationally important geological interest features.</p> <p>The assessment should consider the inter-relationships between topics, for example a number of topics can have a significant influence on biodiversity, such as air quality, noise, water quality and resources. The contaminated land theme should include reference to biodiversity due to the impact that pollution could have on habitats and species and water quality due to potential for leaching of contaminants into water courses.</p> <p>We welcome reference to the local BAP and this should inform the assessment of impacts on biodiversity and help identify opportunities for enhancement.</p> <p>Natural England welcomes reference to the Cambridgeshire Green Infrastructure Strategy in relation to the protection and enhancement of green infrastructure through development. We are pleased to see consideration of Natural England's 'standards for accessible natural greenspace' (ANGSt); this set of benchmarks should be used to ensure new and existing residential development has access to nature. More information can be found on Natural England's publication, 'Nature Nearby, Accessible Greenspace Guidance' (March 2010), available on our website, publication reference NE265.</p> <p>A further useful evidence document in relation to green infrastructure is Natural England's Analysis of Accessible Natural Greenspace Provision for Cambridgeshire and Peterborough. This identifies levels of deprivation, in terms of access to open space, across the ANGSt standards within each LPA area.</p> <p>Natural England is pleased to note reference to the Huntingdonshire Outline Water Cycle Strategy. The findings and recommendations of this important study will need to be fully considered as part of the assessment process. Consideration should be given to the deliverability of drainage infrastructure requirements ahead of, or at least in line with, development to ensure environmental impacts are minimised.</p> <p>We welcome recognition of the role of SUDS in protecting and enhancing water resources. Reference should be made to the multi-functional benefits of SUDS, for example in enhancing landscape, amenity, biodiversity, in addition to drainage and flood management.</p>

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Mr John Davidson		<a href="#">SASR19</a>	Have Observations	In light of the Localism Bill 2011 giving citizens greater say with the introduction of the concept of Neighbourhood Plans more needs to be done to encourage active involvement with the process.
Urban and Civic (David Lock Associates)		<a href="#">SASR27</a>	Have Observations	<p>The publication of the National Planning Policy Framework (NPPF) on the 27th March 2012 represents a sea change in planning policy that will have implications for all levels of planning at policy making and development management levels. The Sustainability Appraisal (SA) Scoping Report should take into account the NPPF at all stages of the SA and for all topics, key aims and SA objectives to ensure that the requirements of the Strategic Environmental Assessment Directive are met.</p> <p>The NPPF identifies the presumption in favour of sustainable development as a 'golden thread' running through plan-making and decision-taking. The new definition of sustainable development should be incorporated into the SA Scoping.</p> <p>While sustainable development is reflected across the SA Scoping in its current form there are aspects of the NPPF that place additional emphasis on a number of elements of sustainability that, in our view, merit particular consideration in reviewing the scoping of the SA:</p> <ul style="list-style-type: none"> <li>• Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. (paragraph 17)</li> <li>• Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; and facilitates flexible working practices such as the integration of residential and commercial uses within the same unit. (paragraph 21)</li> <li>• The transport system needs to be balanced in favour of sustainable transport modes and local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport (paragraphs 29 and 30).</li> <li>• Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities. (paragraph 37)</li> <li>• Housing applications should be considered in the context of the presumption in favour of sustainable development (paragraph 49).</li> <li>• Planning policies and decisions should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. (paragraph 111)</li> <li>• In pursuing sustainable development the need to ensure careful attention to viability and costs in plan-making and decision-taking. (paragraph 173).</li> <li>• The potential use of Local Development Orders where this would promote economic, social or environmental gains for the area, such as boosting enterprise. (paragraph 199)</li> </ul> <p>The SA Scoping would benefit from these elements of sustainability within the NPPF being more clearly articulated in the Key Aims identified in section 3, the Scoping Process within the current framework of topics and flowing through</p>

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				<p>thereafter into SA framework objectives. In particular, the key aims under the topic heading Employment, Business, Retail and Tourism should expressly identify the encouragement of sustainable economic growth given the designation of part of Alconbury Airfield as an Enterprise Zone. A new key aim / key sustainability issue and problem of positively and proactively encourage sustainable economic growth should be considered, with a SA Framework Objective of Maximising inward investment into the Alconbury Enterprise Zone.</p> <p>There is clear encouragement in the NPPF for promoting the co-location of jobs and homes in terms of addressing barriers to investment, facilitating flexible working practices, facilitating the use of sustainable transport modes and minimising journey lengths. This should also be recognised more explicitly within section 3 under Employment, Business, Retail and Tourism.</p> <p>The current key aim of 'promote more sustainable patterns of growth including employment' could be replaced with promote a balance of land uses including housing and new infrastructure and services to stimulate investment, again with a SA Framework Objective of Maximising inward investment into the Alconbury Enterprise Zone.</p>
Mr Tony Chadwick The Woodland Trust		<a href="#">SASR8</a>	Object	<p>Although the Woodland Trust recognises the general principle to protect open space/green space and particularly those that have designations, we urge you to also include both ancient woodland and ancient trees. Ancient woodland (land that has been continually wooded since at least AD1600) is our richest land habitat. Ancient woods form a unique link to the primeval wildwood habitat that covered most of lowland Britain following the last Ice Age.</p> <p>Ancient woods are uniquely valuable. Their wildlife communities are generally richer than those of recent woods, having developed over long periods of time. They contain a high proportion of rare and vulnerable species, many of which require the stable conditions that ancient woodland affords. As the terrestrial habitat most representative of original, natural, stable conditions, ancient woodland is home to more threatened species than any other habitat in the UK.</p> <p>With only 2.4% of the land area in Great Britain covered by ancient woodland we cannot afford any more of this finite resource to be lost forever. It is therefore essential that this habitat be protected from development.</p> <p>Ancient woods are also treasure troves of historical features such as bronze and iron age earthworks, Saxon range boundaries, ancient park boundaries, ridge and furrow, park pales and woodbanks, all of which give a picture of past land use. Old coppice stools and pollards point to past woodland management practices, and charcoal pits, ore furnaces and kilns are clues to local industrial history. Finally, ancient woods are timeless places of great beauty and tranquillity. The importance of woodland, and especially ancient woodland, to our quality of life should not be underestimated.</p> <p>In terms of compensatory measures, it is impossible to replace ancient woodland as this habitat has evolved over centuries and it is impossible to replace hundreds of years of ecological evolution by planting a new site or attempting to translocate them. For these reasons the Trust believes ancient woodland must be given absolute protection under this plan, and any caveat to this effect should be deleted.</p> <p>Woodland has the ability to contribute to 10 of the 20 of the UK Framework Indicators of sustainable development launched in March 2005 (HM Government, 2005, One future - different paths. The UK's shared framework for sustainable development, p12). These include contributing to biodiversity, reducing air pollution, improving health, education, employment, environmental equality, wellbeing and helping the economy grow.</p> <p>The Government's policy on ancient and native woodland, outlined in Keepers of time - A statement of policy for</p>

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				<p>England 's ancient and native woodland, 2005, states that "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland." It also states that "The cultural heritage associated with ancient woodland and veteran trees should be protected and conserved." (Keepers of time - A statement of policy for England 's ancient and native woodland, 2005 , p10)</p> <p>The Biodiversity Strategy for England (Biodiversity 2020: A Strategy for England's Wildlife &amp; Ecosystem Services, Defra 2011, see 'Forestry' para 2.16) states that – 'We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site'.</p> <p>The Government's Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: 'The Government is committed to providing appropriate protection to ancient woodlands....'</p> <p>Under section 74 of the Countryside and Rights of Way Act 2000, the Government has a statutory duty to publish lists of priority conservation habitats. Under section 40 of the Natural Environment and Rural Communities Act 2006, all public authorities now have a statutory duty to conserve biodiversity. The revised UK BAP targets includes a new Habitat Action Plan for Native Woodland which specifies a clear 'maintenance' target of no more loss of ancient woodland. It is therefore axiomatic that the council has a statutory obligation to protect ancient woodland.</p> <p>Old individual trees are an important part of our cultural and landscape heritage : ancient, veteran and notable trees resonate with the history of the landscape and form markers in the lives of individual people and communities. Ancient trees also have a special conservation value, supporting many species of epiphytes, invertebrates and fungi, whilst also providing a habitat for other animals including owls, woodpeckers, other hole nesting birds and bats. In addition, trees make a significant contribution to the urban environment both in visual terms and in helping to abate air pollution and create oxygen.</p> <p>There is a need to ensure that this ancient tree heritage continues in a sustainable way so that future generations will be able to enjoy the benefits of ancient trees after the current specimens are gone.</p> <p>It has been estimated that Britain may be home to a majority of northern Europe's ancient trees and therefore we have a great responsibility in looking after them. Some ancient/veteran/notable trees have already been identified in Huntingdonshire and there may be other ancient trees that we may not yet know about. The Ancient Tree Hunt (<a href="http://www.ancient-tree-hunt.org.uk/">http://www.ancient-tree-hunt.org.uk/</a>) is designed specifically for this purpose.</p> <p>It is important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees.</p>
Mr John Davidson	1.8	<a href="#">SASR20</a>	Have Observations	More must be done to actively involve residents in the process.
Mr John Davidson	1.9	<a href="#">SASR21</a>	Have Observations	It should also be noted that not all communities need or desire additional growth, as that can have a significant impact on the quality of life.
Mr John	2.3	<a href="#">SASR23</a>	Object	Stage D2 add, "Actively encourage maximum public involvement."

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Davidson				
Mr John Davidson	Table 2	<a href="#">SASR22</a>	Object	Add, "Take active steps to encourage maximum public involvement".
Urban and Civic (David Lock Associates)	3	<a href="#">SASR31</a>	Have Observations	There are a number of factual matters regarding Alconbury Airfield and its description that would benefit from some clarification within the SA Scoping. The non-technical summary at page vi and Chapter 3 The Scoping Process on page 16 refer to Alconbury Airfield being designated as an Enterprise Zone. This should be amended to say part of Alconbury Airfield, as correctly described in paragraph 3.11 of the SA Scoping.
Urban and Civic (David Lock Associates)	3	<a href="#">SASR34</a>	Have Observations	While it is a little unclear at this scale, a number of the figures in chapter 3: the Scoping Process suggest that parts of the northern 'peninsula' site of Alconbury Airfield (also known as the Bomb Dump) might be considered to be open space (Figure 3.1: Agricultural Land Classification across the district and Figure 3.3 Distribution of open space across the district).  For the avoidance of doubt, this area is previously developed land and should be identified as such in any mapping.
Urban and Civic (David Lock Associates)		<a href="#">SASR28</a>	Have Observations	The Alconbury Airfield Enterprise Zone bid documentation should be included within the Plans and Programmes reviewed as a source of baseline information setting out the key objectives for delivery of growth on the site.  The Community Infrastructure Levy Charging Schedule and its supporting evidence might also be referenced as a Plan and Programme that will have effects on the environment.
Mr Tom Gilbert-Wooldridge English Heritage (SA Body)	3.5	<a href="#">SASR4</a>	Have Observations	The list of key documents for heritage on page 9 (and Appendix 1) would benefit from the inclusion of the Planning (Listed Buildings and Conservation Areas) Act 1990 alongside the 1979 Act, as this forms the legislative framework for listed buildings and conservation areas. At the local level, reference should be made to the district's suite of conservation area character statements, which identify issues and features to be preserved and enhanced
Mr Paul Wiltshire	3.5	<a href="#">SASR24</a>	Object	Under the topic of Health & Wellbeing, it would be good to expand on the list of community facilities to include not only sport facility and open spaces, but also meeting places, public houses and places of worship.  Also, as a topic - to take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being.  This is supported by the new National Planning Policy
Miss Sinéad O'Donoghue Cambridgeshire County Council	3.5	<a href="#">SASR25</a>	Have Observations	The following documents may be useful to include under the Education section:  Childcare Act 2006  Formalised the important strategic role that Local Authorities play in the planning and commissioning of early years provision. The Act takes forward some of the key commitments from the 'Ten-year childcare strategy', published in 2004, and sets out a number of statutory duties that Local Authorities must fulfil.  The duties that accompanied the Childcare Act 2006 were further clarified in statutory guidance published in 2010,

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				<p>building upon the 'Apprenticeships, Skills, Children and Learning Act 2009'.</p> <p>Education Act 1996</p> <p>Standards and Framework Act 1998</p> <p>Introduced a wide range of duties and responsibilities for Local Authorities, schools and governing bodies, including:</p> <ul style="list-style-type: none"> <li>• the introduction of a limit on Infant Class size, subsequently determined as being 30 pupils within a single class to one teacher;</li> <li>• the requirement to rationalise school places in line with guidance produced by the Secretary of State;</li> <li>• the introduction of the Code of Practice (Admissions Code) issued by the Secretary of State to underpin admission arrangements nationwide; and the requirement to enable parents to express a preference for the school they wished their children to attend.</li> </ul> <p>Learning and Skills Act 2000</p> <p>Introduced proposals for city academies. These were developed further in the 'Education Act 2002'. Academies, as city academies have since become known, are independent state schools which receive their funding directly from Central Government, and which have greater flexibility over curriculum, contracts of employment and staff pay than other schools in the public sector.</p> <p>Education Act 2005</p> <p>Made provision for Federations between schools and a competition process to be undertaken by Local Authorities prior to establishing new secondary schools.</p> <p>Education and Inspections Act 2006</p> <p>Subsequently placed requirements on Local Authorities to:</p> <ul style="list-style-type: none"> <li>- exercise their duties to ensure that the provision of education promotes high standards, ensures fair access to educational opportunity and promotes the fulfilment by every child of their educational potential;</li> <li>- secure diversity in the provision of schools and increase the opportunities for parental choice; and to</li> <li>- give considerations to parental representations</li> </ul> <p>It also extended the new school competition requirement to include primary and special schools.</p>
Mr Tom Gilbert-Wooldridge English Heritage (SA Body)	3.41	<a href="#">SASR5</a>	Have Observations	<p>We welcome reference to the historic environment in paragraphs 3.41 and 3.42. It is helpful to refer to the buildings at risk in Huntingdonshire based on the district's own register, but it would also be good to refer the English Heritage's Heritage at Risk Register, which includes more than just listed buildings. The register for 2011 states that there are 4 listed buildings (Grade I and II* only) and 8 scheduled monuments "at risk" in the district (the register can be accessed via <a href="http://www.english-heritage.org.uk/caring/heritage-at-risk">www.english-heritage.org.uk/caring/heritage-at-risk</a>).</p>

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Mr George Sykes	3.48	<a href="#">SASR2</a>	Have Observations	Please see my comment on Carbon Cost of crime in Section 3.110 of this document.
Rose Freeman The Theatres Trust	3.58	<a href="#">SASR9</a>	Have Observations	The Health and Well-being paragraphs from 3.58 to 3.60 on page 27 under section A2 Collecting Baseline Information do not mention venues or locations for cultural activities but only deal with health services and hospitals. This is inconsistent and we suggest another paragraph be added to record present access to existing cultural facilities or similar.
Mr John Davidson	3.59	<a href="#">SASR15</a>	Object	Modify to include, "A significant portion of the population live in the north of the district and are served by Peterborough and Stamford hospitals. These days that incorporates both health care and social care that have become increasingly intertwined."
Mr John Davidson	3.63	<a href="#">SASR18</a>	Have Observations	It should be noted that Yaxley is only a village that lacks the infrastructure of a town, relying on its proximity to Peterborough.
Mr John Davidson	3.67	<a href="#">SASR17</a>	Have Observations	It should be recognised that if residents are allowed to extend their properties unabated that will have a detrimental effect on the stock of affordable housing.
Mr John Davidson	3.70	<a href="#">SASR16</a>	Have Observations	The difficulty of projecting future need should be recognised. Even the Gypsy Council admit to not being able to predict need more than 3 years into the future.
Urban and Civic (David Lock Associates)	3.78	<a href="#">SASR32</a>	Have Observations	Paragraph 3.78 suggests that the Enterprise Zone (EZ) is in the western portion of the airfield. In fact the EZ is split into three elements located across the Alconbury Airfield site and including land to the east of the Airfield adjacent to the East Coast Main Line as shown on the attached plan.
Urban and Civic (David Lock Associates)	3.79	<a href="#">SASR33</a>	Have Observations	Paragraph 3.79 refers to the EZ bid. The scale of development quoted at paragraph 3.79 only related to what was considered might be delivered up to 2015 – the whole 150 hectares will contain considerably more than 37,000 sq m.
Mr George Sykes	3.110	<a href="#">SASR1</a>	Have Observations	<p>Climate change is all too prevalent and crime also has an impact on climate change and carbon cost.</p> <p>Reported crime and the loss and damage associated with crime in England &amp; Wales equates to a staggering 5.5 million tonnes of CO2 per year - with un-recorded crime taking this to over 6.5m tonnes!</p> <p>With 5.6m tonnes attributable to the consequence of crime (e.g. car journeys taken for fear of travelling on public transport, house moves because of crime suffered or perceived) the overall total carbon cost of crime equals more than 12.5m tonnes of CO2. That total roughly equates to 2% of the UK's total CO2 output.</p> <p>The report "The Carbon Cost of Crime and its Implications" by Professor Ken Pease give the research and results of a study into crime and its costs.</p> <p>It is important that the correct emphasis is given within any Local Plan to promote the aim of positive action in reducing crime, which is best achieved at the initial design stage, and acknowledged by submissions within any Design &amp; Access Statements submitted with Planning Applications.</p>
Mr Tom Gilbert-	Table 3	<a href="#">SASR6</a>	Have	We welcome the identification of the historic environment as a key issue for the district in Table 3. While the



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Wooldridge English Heritage (SA Body)			Observations	recognition of the historic environment's tourism and economic role is useful, the historic environment should also be valued for its social and environmental benefits, such as defining local distinctiveness and enhancing quality of life. Our SA guidance provides further examples of issues that you may wish to highlight (see: <a href="http://www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1300094357">www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1300094357</a> ).
Rose Freeman The Theatres Trust	Table 3	<a href="#">SASR10</a>	Have Observations	The suggested objectives on page 39 for Health and Well-being under Key Sustainability Issues and Problems are ideal for well-being. However, the spelling of Well-being in the title box on page 39 should be hyphenated to be consistent with this term elsewhere in the document.
Jennifer Dean Anglian Water Services Ltd	A 4: Developing the SA Framework	<a href="#">SASR26</a>	Have Observations	<p>Thank you for consulting us on the Draft Sustainability Scoping Report. We welcome engagement with Huntingdonshire District Council on the growth proposals within the district. We have the following comments to make on the consultation draft:</p> <p>We suggest the third objective under the land, Water and Flood Risk should read 'manage and minimise all forms of flood risk (taking into account climate change)'.</p> <p>The ongoing Water Cycle Study (WCS) may identify matters to be considered within the Sustainability Appraisal. Accordingly, we recommend there is flexible approach to issues considered to ensure the final Sustainability Appraisal is fully informed by emerging evidence base documents. We are committed to working with all partners of the Huntingdonshire WCS to enable development within environmental capacity.</p>
Urban and Civic (David Lock Associates)	A 4: Developing the SA Framework	<a href="#">SASR29</a>	Have Observations	<p>Very large scale major development such as that proposed at Alconbury will deliver significant new infrastructure, services, open spaces and other positive attributes as an inherent element of the proposals. A scheme of this scale will also accommodate a range of development forms, densities and uses that do not always readily fit with the sorts of criteria identified in the Decision Aiding Questions for sites.</p> <p>Section A4 should increase the use of the category 'potentially on site' to a wider range of questions as very large scale major development sites such as Alconbury could provide for elements that smaller sites could not (for example is the site within 300m of an area of natural green space over 2ha). In connection with the 'potentially on site' category, the scoring system at paragraph 3.119 is questioned as it accords a lower 'neither positive or negative or uncertain' score, compared to a site that meets the criteria outside of the site. This is illogical as it deliberately downgrades new infrastructure and services (which will often be of a higher quality and standard) below existing infrastructure and services. There is no reason that the effects of provision on site should be more uncertain than for existing provision outside of a site to endure.</p> <p>It is suggested that it might be more useful to base the likelihood of provision on site against the guidelines within the Council's Developer Contributions Supplementary Planning Document. If this suggests, based on scale thresholds, that provision should be made on site, then the SA should assume on site provision is made and score the effect as positive. A number of the decision aiding questions for sites also introduce criteria that are not backed up with references to recognised standards (for example is the site within 300m of a natural green space over 2ha, within 400m of a food shop, within 600m of a primary school, 400m of a bus stop). The distance of 800m is usually accepted as a reasonable walking distance to local facilities and is often used in Sustainability Appraisals as a benchmark figure for accessibility.</p> <p>The SA Framework Objective suggested above of Maximising inward investment into the Alconbury Enterprise Zone might be incorporated into SA objective 19 Improve the efficiency, competitiveness, vitality and viability of the local</p>

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				<p>economy, including the rural economy and tourism and also of town centres and retail facilities and Alconbury Enterprise Zone.</p> <p>The SA objectives should also reflect the benefits of investment in the provision of infrastructure and stimulation of investment generally. The associated decision aiding questions for sites could be augmented with an additional question: Will the mix of uses promote a balance of land uses including housing and new infrastructure and services to stimulate investment and economic activity?</p>
Mr Tom Gilbert-Wooldridge English Heritage (SA Body)	3.117	<a href="#">SASR7</a>	Have Observations	<p>We greatly welcome the inclusion of a SA objective relating to the historic environment (No. 7), following our comments on the Planning Policies DPD SA Scoping Report last year. We are happy with the wording of the SA objective, but wonder whether the decision aiding questions could be clarified. Our SA guidance might help with such questions.</p> <p>In terms of the question for the strategy, the word “sensitive” is not entirely clear. Development might be sensitive to the district’s heritage but still cause harm. We feel that the phrase “will it promote development which preserves and enhances the district’s heritage” would be clearer and consistent with national policy and legislation.</p> <p>In terms of the question relating to sites, the question should refer to the settings of heritage assets as well as the assets themselves. The decision as to whether the impact is positive, negative or negligible will require professional judgement (including from conservation and archaeology colleagues). This is important both in terms of assessing the impact of a site on the setting of heritage assets beyond the site boundary, but also in terms of assessing the impact on heritage assets within the site, including buried archaeology. Cumulative impact of a number of site allocations on the same heritage asset/s is important to consider, as well as the weighting given to the historic environment opposed to other factors such as flood risk or biodiversity (some sites may be fine in all other respects, but could still fail purely on historic environment grounds).</p> <p>It should be possible to rule out part or all of certain sites from the beginning if they contain nationally significant heritage assets (particularly designated heritage assets, but also nationally significant archaeology etc), as allocating them for housing, employment etc is likely to cause fundamental conflicts (although it depends on the specific site, proposed use and the heritage asset/s within the site). The more significant and extensive the heritage asset, the greater the impact is likely to be. Similarly, development within the setting of a heritage asset could be ruled out from the beginning in some cases.</p> <p>While avoiding harm to the historic environment is perhaps the primary aim of any site assessment process, opportunities to enhance the historic environment through the allocation and development of specific sites should not be overlooked. This might include redeveloping a site that currently harms the significance and setting of heritage assets, or a site that contains a heritage asset "at risk", whose future might be secured by new development.</p> <p>In terms of the question relating to development management policies, reference to enhancement should be included alongside protection, while the brackets should refer to designated and non-designated, rather than listed and non-listed (to cover all types of heritage assets).</p> <p>Indicators will need to be developed alongside the objective for the historic environment. Our SA guidance provides some advice on potentially suitable indicators.</p>
Urban and Civic (David Lock)	A 5: Consulting	<a href="#">SASR30</a>	Have Observations	The SA Scoping may also benefit from clearer reference to the duty to cooperate across administrative boundaries, particularly in considering any cross boundary effects that might be anticipated.

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Associates)	on the scope of the SA			
Rose Freeman The Theatres Trust	Appendix 1:	<a href="#">SASR11</a>	Have Observations	Appendix 1 does not include the Cambridgeshire Arts and Culture Strategy which relates to the well-being element of this document. Unfortunately the Huntingdonshire Cultural Strategy 2007-2010 does not seem to have been updated although its essence may have been incorporated within the Huntingdonshire Sustainable Community Strategy, but the targets in the right hand box on page 64 do not include cultural activities. We suggest for consistency that it should.
Rose Freeman The Theatres Trust		<a href="#">SASR12</a>	Have Observations	Thank you for including cultural needs in the explanation of the term 'Community Infrastructure' in the Glossary. Museums and libraries (not mentioned in the examples given) play a key role in encouraging knowledge, experience and quality of life in its broadest sense. The information and stimulation these facilities can offer promotes a wider understanding of the world and offers individuals the opportunity to acquire new skills and knowledge to enjoy a rich and varied cultural life.