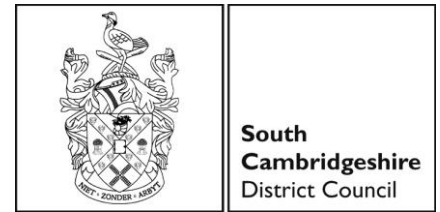


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Friday 11 November 2022

To: Chairman – Councillor Dr. Tumi Hawkins
Vice-Chairman – Councillor Katie Thornburrow
All Members of the Joint Local Planning Advisory Group - Councillors
Tim Bick, Peter Sandford, Shailer, Smith and Dr. Richard Williams

Dear Sir / Madam

You are invited to attend the next meeting of **JOINT LOCAL PLANNING ADVISORY GROUP**, which will be held in **VIRTUAL MEETING - ONLINE** at South Cambridgeshire Hall on **MONDAY, 21 NOVEMBER 2022 at 5.30 p.m.**

Yours faithfully
Liz Watts
Chief Executive

Requests for a large print agenda must be received at least 48 hours before the meeting.

AGENDA

	PAGES
1. Apologies for Absence To receive apologies for absence from Members of the Advisory Group	
2. Declarations of Interest	
3. Homes and Wellbeing and Social Inclusion	1 - 150

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Agenda Item 3

Report to:	Joint Local Planning Advisory Group 21 November 2022
Lead Members	Lead Cabinet Member for Planning (South Cambridgeshire) – Tumi Hawkins Executive Councillor, Planning and Transport (Cambridge) – Cllr Katie Thornburrow
Lead Officer:	Joint Director of Planning and Economic Development

Joint Local Planning Advisory Group Programme to Draft Local Plan - Second Session: Homes and Wellbeing and Social Inclusion

Executive Summary

1. Leading up to the next member decisions on the Greater Cambridge Local Plan further member engagement will now take place to explore issues raised in the First Proposals feedback and help to inform development of the draft plan. The third session will be used to discuss feedback received on the 'homes' and 'wellbeing and social inclusion' parts of the plan.

Key Decision

2. No

Recommendations

3. It is recommended that the advisory group:
 - a. offers views regarding issues raised in representations to the First Proposals in relation to 'homes' and 'wellbeing and social inclusion' policies.

Reasons for Recommendations

4. The Joint Local Planning Advisory Group (JPLAG) provides an appropriate forum for consideration of issues raised in representations and can help steer development of the local plan.

Details

Background

5. South Cambridgeshire District Council and Cambridge City Council are working together to produce a joint local plan for the Greater Cambridge area. Plan-making so far has involved significant stakeholder engagement and two main stages of public consultation.
6. The Greater Cambridge Local Plan First Proposals consultation was held between 1 November and 13 December 2021. In June and July 2022 members of both Councils received reports on feedback received and the full consultation results were published. A [report on the consultation](#) and all the results are available on the Councils' local plan website. In summary:
 - Approximately 4,100 comments were made on the First Proposals, by 625 different respondents (this includes comments received online or input having been received by other means e.g. email);
 - The quick survey received 5,551 answers or comments from 598 unique respondents;
 - 41 new sites were received; and
 - 172 sites had new information submitted which in some cases included revisions to site boundaries.
7. Comments registered on the Councils' online consultation system can be viewed on our First Proposals website: [Greater Cambridge Local Plan - First Proposals](#). Responses to the quick questionnaire have been collated into a spreadsheet. This is available on our local plan webpage: [Greater Cambridge Local Plan](#) (greatercambridgeplanning.org). Site information can be found on the Call For sites pages on our local plan webpage: [Greater Cambridge Local Plan](#) (greatercambridgeplanning.org).
8. The next key member decisions in relation to the local plan, to be made by South Cambridgeshire District Council's Cabinet and Cambridge Planning and Transport Scrutiny Committee, will be:
 - A report to members in January 2023 to confirm the preferred options for the Local Plan strategy and sites;
 - A report in summer 2023 to consider the complete draft local plan prior to consultation.

Approach to JLPAG Meetings

9. Leading up to the next member decisions on the Local Plan further member engagement will now take place to explore issues raised in the First Proposals feedback and help to inform development of the draft plan. This will be via the JPLAG which was set up with the purpose of enabling such discussion.
10. A series of meetings of JLPAG are now taking place on an approximately monthly basis, with three sessions planned for 2022, and two sessions in 2023. Further information on the approach to these meetings was reported to and considered at the first session on 3 October 2022. The first session also considered the topics of vision and aims, and climate change. The session was livestreamed and the recording is available to view here: [Agenda for Joint Local Planning Advisory Group on Monday 3 October 2022](#). The second session took place on Monday 24 October 2022 and considered the topics of strategy and sites. The session was livestreamed and the recording is available to view here: [Joint Local Plan Advisory Group meeting, Monday 24 October 2022](#).

Session 3: Homes and Wellbeing and Social Inclusion

11. This session will consider the comments received relating to homes and wellbeing and social inclusion. Summaries of the issues raised in representations are included as appendices to this report, with the full submissions available to view on the Councils' [Local Plan website](#). The links in the section below link to the relevant sections in the interactive version of the First Proposals.
12. At this session, officers will provide a presentation setting out what the First Proposals suggested as the preferred policy approach, key feedback that was received, and the next steps officers are taking to explore the issues, moving towards development of the draft plan.
13. Homes and wellbeing and social inclusion are key elements of the plan which include proposed policies that seek to meet the housing needs of the area and deliver 'good growth'. Both policy groups attracted a significant number of comments from respondents. Below, the two policy areas are sub-divided to summarise what was proposed in the First Proposals consultation.

Homes

14. [Homes](#) - This section of the First Proposals policies which will guide the different types of housing and tenures which will be required:
15. [Policy H/AH: Affordable housing](#) – Sets out how affordable housing will be delivered, by specifying the size of developments on which affordable housing will be provided and the type of housing needed to address identified needs. Specifically, the policy proposes that on sites of 10 or more dwellings 40% of new homes will be required to be affordable.

16. [Policy H/ES: Exception sites for affordable housing](#) – Explains the circumstances in which rural exception sites and First Homes exception sites would be supported.
17. [Policy H/HM: Housing mix](#) – Outlines the mix of housing to be provided at new developments, ensuring that new housing is of a size and type to meet the housing needs of different groups in the community. Specifically housing developments of 10 or more dwellings will be required to provide an appropriate mix of housing sizes.
18. [Policy H/HD: Housing density](#) – Seeks to ensure that land is used effectively when being developed for new housing and aspires to deliver higher densities on specific sites, particularly those with good accessibility subject to local character considerations.
19. [Policy H/GL: Garden land and subdivision of existing plots](#) – Sets out criteria to determine when it will be acceptable for garden land and existing residential plots to be developed for new housing.
20. [Policy H/SS: Residential space standards and accessible homes](#) – Proposes standards for internal spaces within new homes, the proportion of accessible and adaptable dwellings to be provided as part of dwelling mix, and provision of external private and shared amenity space. Specifically, it sets standards for gross internal floor areas which exceed national standards.
21. [Policy H/SH: Specialist housing and homes for older people](#) – Will help to guide proposals for specialist housing designed to support a variety of groups such as older people, disabled people, people with alcohol or drug dependency, those requiring refuge from harassment and violence, and others who may, for a variety of reasons, be excluded from the local community.
22. [Policy H/CB: Self and custom build homes](#) – Proposes how custom build and/or self-build homes across Greater Cambridge will be delivered. Specifically, 5% of all new homes in residential developments of 20 dwellings or more will be required to be custom, and/or self-build as long as the Greater Cambridge's self/custom built register demonstrates a demand for these types of homes when a planning application for 20 or more homes is considered. The policy will also allow for 'community-led' housing.
23. [Policy H/BR: Build to rent homes](#) – Asserts how and when proposals for Build to Rent homes would be supported. The policy will require at least 20% of homes on a Build to Rent development of 10 or more homes to be affordable private rented and these homes will contribute towards the overall 40% affordable homes to be provided on a mixed tenure development.
24. [Policy H/MO: Houses in multiple occupation \(HMOs\)](#) – Sets standards that proposals for houses in multiple occupation (HMOs) must meet.

25. [Policy H/SA: Student accommodation](#) – Sets out how and when proposals for new student accommodation for higher education institutions would be supported.
26. [Policy H/DC: Dwellings in the countryside](#) – Sets out types of residential development that might be acceptable in the countryside outside of defined settlement boundaries.
27. [Policy H/RM: Residential moorings](#) – Explains how the criteria to be used when considering proposals for new moorings.
28. [Policy H/RC: Residential caravan sites](#) - Sets out the criteria to be used when considering proposals for new residential caravan sites.
29. [Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites](#) – identifies that the accommodation needs of Gypsies and Travellers and Travelling Showpeople will be identified through an updated needs assessment, and that the plan will identify how those needs should be met. It also identifies policy criteria regarding the location and design of sites.
30. [Policy H/CH: Community-led housing](#) - Explains the criteria which will be used when considering proposals for new community-led housing.

Wellbeing and Social Inclusion

31. [Wellbeing and social inclusion](#) - This section of the First Proposals set out how the plan could achieve 'good growth'. The policies within this section aim to help people in Greater Cambridge lead healthier and happier lives to ensure that everyone benefits from the development of new homes and jobs.
32. [Policy WS/HD: Creating healthy new developments](#) – Will integrate health considerations into the planning and design of new developments. Specifically, it draws upon the ten principles developed from the *Healthy New Towns* initiative.
33. [Policy WS/CF: Community, sports and leisure facilities](#) – Sets out what new community (including culture, education and healthcare), sports, and leisure facilities should be provided and sustained through new development. The policy aims to ensure that new facilities are developed in appropriate locations, where there is a need for the facilities near the people they serve.
34. [Policy WS/MU: Meanwhile uses during long term redevelopments](#) – Sets out when and how meanwhile uses should be provided before and during the development of major sites. The aim of the policy is to support the local community and contribute to the vibrancy of the area as new communities develop.
35. [Policy WS/IO: Creating inclusive employment and business opportunities through new developments](#) – Sets out how new developments should support

the skills and training needs of residents and provide opportunities for local businesses.

36. [Policy WS/HS: Pollution, health and safety](#) – The policy will set out how new development should take account of sources of pollution so that it does not lead to significant adverse effects as a result of noise, vibration, odour, and/or light pollution.
37. [Policy WS/PH: Protection of public houses](#) - This policy was previously placed under the 'Great Places' sub-category of policies but has been moved to this section of policies. It will control development proposals involving the loss of public houses.

Options

38. There are no decisions being sought by this report, although Members views are invited.

Implications

39. In the writing of this report, taking into account financial, legal, staffing, risk, equality and diversity, climate change, and any other key issues, the following implications have been considered:-

Financial

40. There are no direct financial implications.

Equality and Diversity

41. There is no decision to be made as part of this report. The development plans will each be subject to Equalities Impact Assessment at each stage during their development.

Climate Change

42. There is no decision to be made as part of this report. Notwithstanding, development plans provide an opportunity to address the aspects of the environment that can be influenced by the planning system. These aspects will be considered by a range of evidence including via a Sustainability Appraisal as the plans are prepared. One of the big themes for the Greater Cambridge Local Plan identified in The First Proposals is climate change. Evidence has been

produced to inform the plan, including a study on how the plan can assist with the journey towards net zero carbon.

Health & Wellbeing

43. There is no decision to be made as part of this report. Notwithstanding, the vision and policies of the emerging Local Plan seek to support wellbeing and social inclusion.

Consultation responses

44. One of the main purposes of this series of meetings is to further explore the significant amount of consultation feedback received to the Greater Cambridge Local Plan First Proposals.

Background Papers

Background papers used in the preparation of this report:

[Terms of Reference of the Joint Local Planning Advisory Group](#)

[Greater Cambridge Local Plan – First Proposals consultation 2021](#)

[GCLP First Proposals Consultation Report 2022](#)

[Current Greater Cambridge Local Development Scheme](#)

Appendices

Appendix A Homes Representation Summaries

Appendix B Wellbeing and Social Inclusion Representation Summaries

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Appendix A: Summaries of Representations – Homes Chapter

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Homes

Hyperlink for all comments

Open this hyperlink - [Homes](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 32

Notes

- Whilst the webpage linked above effectively included only general comments on the Homes policies, some comments attached to this webpage relate to specific housing, biodiversity and green spaces, and infrastructure policies. These comments have been moved to the specific policy: BG/BG: Biodiversity and geodiversity, BG/GI: Green infrastructure, H/AH: Affordable housing, H/ES: Exception sites for affordable housing, H/HM: Housing mix, H/HD: Housing density, H/GL: Garden land and subdivision of existing plots, H/SS: Residential space standards and accessible homes, H/SH: Specialist housing and homes for older people, H/CB: Self and custom build homes, H/BR: Build to rent homes, H/MO: Houses in multiple occupation, H/SA: Student accommodation, H/CH: Community led housing, and I/ID: Infrastructure and delivery.
- Some comments attached to this section relate to the overall number of jobs and homes, the overall development strategy, and specific sites. In many cases the representors that made these comments have also made similar comments on the strategy and sites sections within the plan, with the comments attached to this webpage supplementing them by referring to issues relating to the housing policies. Where appropriate we will review placement of these comments in the final version of these representation summaries which will accompany the draft plan.

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There is general support for the proposed housing policies from some Parish Councils, Cambourne TC and some site promoters. General comments on the homes chapter include support for the Local Plan requiring a wide range of housing – type, size and tenure - as this will improve the ability of the market to achieve enhanced levels of delivery and will support the creation of diverse communities. Specific comments suggest the need for family homes with gardens within the city and the need to reuse vacant buildings to minimise whole life carbon emissions. Parish Councils suggest that there is a need to prevent building of new homes while others remain empty, and the need to protect new homes from being lost to buy to let. Metro Property Unit Trust asks for the housing policies to recognise the importance of purpose-built student accommodation, as this reduces the demand on the existing and proposed housing stock. Great Shelford PC highlight that homes do not make a community, and that they need to be supported by infrastructure.

Table of representations: Homes

Summary of issues raised in comments	Comments highlighting this issue
Support / general support for proposed housing policies.	58456 (Orwell PC), 58468 (Linton PC), 59175 (Grosvenor Britain & Ireland), 59281 (Cambourne TC), 58778 (Phase 2 Planning)
Homes need to be of good quality and high environmental standard.	56768 (Croydon PC)
Support the reuse of vacant buildings, where this is an effective way of minimising whole life carbon emissions.	57779 (Carbon Neutral Cambridge)

Summary of issues raised in comments	Comments highlighting this issue
Local Plan needs to provide a wide range of housing – rented, retirement living, market housing, affordable housing, and custom and self build homes – as this will improve the ability of the market to achieve enhanced levels of delivery. Such diversity is best achieved on larger sites.	57912 (Martin Grant Homes)
Need homes of all sizes in new developments, including family homes with gardens within 2 miles of the City. There is currently an oversupply of flats that are not selling.	57587 (D Lott)
The mix and affordability of homes is critical.	58279 (Histon & Impington PC)
Support need to plan for sufficient housing to meet economic growth aspirations and to ensure the right mix of housing tenures to meet requirements of diverse communities.	58809 (Trumpington Meadows Land Company)
Support the Councils aims in respect of homes, however concerned the approach will constrain sustainable economic growth and not meet the housing requirement to 2041.	58378 (Hallam Land Management Limited)
Support proposed strategy to plan for and deliver enough homes to meet objectively assessed needs, including significant amounts of affordable housing and a mix of tenures to suit diverse community needs.	59701 (Central Bedfordshire Council)

Summary of issues raised in comments	Comments highlighting this issue
High standards of housing can be achieved through preparation of development briefs and design codes.	57912 (Martin Grant Homes)
Support for action to prevent building of new homes when others lie empty.	59278 (Great Shelford PC)
Continuous requirement for new housing – something should be done about empty homes.	59242 (Teversham PC)
Would be good to see restrictions on buy to let.	59278 (Great Shelford PC)
Taxable penalty to deter new homes from being bought by those with no intention to live there. Could require new homes to be lived in by owners. Otherwise the housing shortage will never end, and further land will be needed for new development.	59242 (Teversham PC)
The housing policies should recognise the importance that purpose built student accommodation plays in reducing demand on existing and proposed housing stock.	59090 (Metro Property Unit Trust)
Homes do not make a community – need to be supported by infrastructure.	59278 (Great Shelford PC)
No comment.	57441 (Huntingdonshire DC), 58037 (Great and Little Chishill PC), 59126 (University of Cambridge)

Representations relating to S/JH: New jobs and homes

Summary of issues raised in comments	Comments highlighting this issue
<p>Strongly supportive of principle of planning for enough housing to meet the needs of Greater Cambridge, including proposed approach of delivering more homes than the standard method. However, consider there is significant opportunity to consider increasing the target as a positive response to evidence base and scale of employment growth.</p>	<p>58588 (Marshall Group Properties)</p>
<p>Support for planning for enough homes to meet needs, including affordable housing to rent or buy. But object to needs being driven by future economic assessments as should also consider climate change.</p>	<p>60139 (C Blakeley)</p>
<p>Note the housing target and is supportive of appropriate brownfield sites being redeveloped to help contribute towards meeting the housing need for Greater Cambridge.</p>	<p>57240 (Abrdn), 57282 (Universities Superannuation Scheme – Commercial), 58224 (Universities Superannuation Scheme – Retail)</p>
<p>Councils could be more aspirational in relation to the number of homes to be delivered within the plan period. Suggest the aim on page 258 is updated to read “...for enough housing to meet our needs, as a minimum”.</p>	<p>58729 (The Church Commissioners for England)</p>

Summary of issues raised in comments	Comments highlighting this issue
The jobs forecast may be higher than the middle forecast included in the Local Plan, and this would potentially mean an increase in the homes target for the plan period.	58025 (Imperial War Museum/Gonville and Caius College)
Would like to see the direct evidence for housing need in Greater Cambridge – split by sizes and types of homes. Well known that people struggle to afford homes in this area and there is an often unchallenged assumption that this will be solved by building more homes – what research has been carried out into what actually drives high house prices, and what evidence is there that building more homes will address this?	60794 (Cambridge and South Cambridgeshire Green Parties)

Representations relating to S/DS: Development strategy

Summary of issues raised in comments	Comments highlighting this issue
Object to failure to provide adequate levels of housing to south of City. Development at Whittlesford can deliver a mix of housing types and tenures to cater for all generations.	59175 (Grosvenor Britain & Ireland)
Many proposed developments around Cambridge that is already a congested and expensive area to live. But that there are few proposed developments south west of the City	60822 (T Wood)

Summary of issues raised in comments	Comments highlighting this issue
where there are good road and rail links that would support more development than currently proposed.	

Representations relating to S/CE: Cambridge East

Summary of issues raised in comments	Comments highlighting this issue
Cambridge East provides a significant opportunity to tackle the affordability crisis within Cambridge, by accommodating a wide range of homes of different sizes and tenures.	58588 (Marshall Group Properties)

Representations relating to S/RSC: Other site allocations in the rural southern cluster

Summary of issues raised in comments	Comments highlighting this issue
Proposed development at Mingle Lane, Stapleford would severely impact the Green Belt, Gog Magog Hills, Wandlebury, and the rural landscape with little or no benefit to local people. Landscape and biodiversity cannot be replaced once lost. Will result in coalescence with Cambridge. Infrastructure is insufficient to support more development.	57545 (Stapleford PC)

Summary of issues raised in comments	Comments highlighting this issue
Avtech1, Avtech 2 and the expansions of Duxford village (HELAA Site 40095) – should be allocated for employment uses, housing and community facilities	58025 (Imperial War Museum/Gonville and Caius College)

Representations relating to S/RRA: Allocations in the rest of the rural area

Summary of issues raised in comments	Comments highlighting this issue
Land at Hazelwood Farm, Lolworth (HELAA site 52680) – should be allocated for employment development	57231 (R Cowell)

H/AH: Affordable housing

Hyperlink for all comments

Open this hyperlink - [Policy H/AH: Affordable housing](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 62

Note

- Some representations included in this summary of representations table have been moved from the Homes and Wellbeing and Social Inclusion headings as the comments were specific to affordable housing. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There is support for the policy direction from many developers whilst parish councils, community groups and individuals want the policy to go further by providing homes that are more affordable, more secure and are run by community groups or local authorities. There also calls for affordable housing to be targeted at local people, older people and key workers and for a broader range of affordable tenures including low cost home ownership. Parish councils, community groups and individuals want to see the 40%

requirement strictly enforced whilst developers call for flexibility based on robust viability assessments and review mechanisms which also cater for specific needs of schemes such as Extra Care schemes which cannot compete with market housing. They also highlight exemptions set out in the NPPF. There are disagreements over clustering with parish councils wanting affordable housing spread across developments but developers calling for some flexibility to match Registered Provider preferences. Developers argue that allocating more small sites will deliver more affordable housing more quickly than relying on strategic sites with their significant infrastructure overheads.

Table of representations: H/AH - Affordable Housing

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for the proposed policy direction:</p> <ul style="list-style-type: none"> • 40% affordable housing on all schemes of 10+ dwellings • Support for policy direction and intention to deliver a policy compliant development at Cambridge East that offers wide ranging housing benefits, including to those in greatest housing need • Increase in provision from current Cambridge Local Plan justified by need • High level of need exacerbated by rising house prices in Cambridge 	<p>Public Bodies</p> <p>57442 (Huntingdonshire District Council); 57742 (Bassingbourn-cum-Kneesworth PC); 59487 (Shepreth PC); 59702 (Central Bedfordshire Council)</p> <p>Developers, Housebuilders and Landowners</p> <p>58231 (Countryside Properties - UK Ltd); 58590 (Marshall Group Properties); 58801 (Wates Developments Ltd); 58816 (Trumpington Meadows Land Company ('TMLC') a joint venture between Grosvenor Britain & Ireland and Universities</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Supports for the expanded provision of affordable housing • Important that such homes are built with inclusion, health and wellbeing at the forefront. 	Superannuation Scheme); 58829 (Wates Developments Ltd); 58835 (Wates Developments Ltd); 58901 (CBC Limited, Cambridgeshire County Council and a private family trust); 60226 (Thakeham Homes Ltd); 60555 (Thakeham Homes Ltd)
Rate of affordable housing is appropriate in the context of the Greater Cambridge area where affordability is a key issue.	58778* (Phase 2 Planning)
More affordable housing is needed, including at the Biomedical Campus.	57587* (D Lott)
Need a more refined approach to affordability that recognises the total cost of living in each location including, for example, the need for a car(s) due to lack of public transport or active travel options.	58180 (Cllr Gough)
Not enough truly affordable housing – unrealistic definition of affordable housing used in planning, as 80% market value is not affordable for the majority of people. <ul style="list-style-type: none"> • As much affordable housing as possible should be truly affordable i.e. social rent, rather than affordable rent or discounted market. 	<p>Public Bodies</p> 59278* (Great Shelford PC); 59242* (Teversham PC); 56525 (D Kelleway); 56769 (Croydon PC); 56746* (Croydon PC); 58469 (Linton PC); 59185 (Great Shelford PC) <p>Other Organisations</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Provide truly affordable housing for lower paid and starters • We need truly affordable housing for young families 	60795 (Cambridge and South Cambridgeshire Green Parties); 56994 (Trumpington Residents Association)
We need a large increase in council owned and managed secure rented property backed up by community ownership cooperatives, housing associations and cohousing projects.	60795 (Cambridge and South Cambridgeshire Green Parties)
All affordable housing should be council housing to provide security of tenure, accountability and efficiency.	59242* (Teversham PC); 56526 (D Kelleway)
Concerned about affordability of houses in Cambridge, the loss of affordable housing to Right To Buy and first time buyers being outbid by Buy To Rent landlords	59464 (S Buckingham)
Split between houses and flats on a development should be the same for market and affordable units, and not like the Wing development where ratio of houses to flats is almost inverse for affordable homes to that for market homes.	59242* (Teversham PC); 56525 (D Kelleway)
Affordable housing should be prioritised for local people and protected in perpetuity.	57554 (Stapleford PC)
The Histon & Impington Neighbourhood Plan emphasises the need for affordable housing. This need can be best met by the provision of smaller Rural Exception Sites, delivered by	59803 (Histon & Impington Community Land Trust)

Summary of issues raised in comments	Comments highlighting this issue
the local Community Land Trust, in preference to market led schemes which will deliver minimal local benefits.	
A mix of housing types should be provided across Greater Cambridge. Alongside open market sale housing this should include affordable rent, social rent, starter homes and rent to buy. We have significant reservations regarding the affordability of the First Homes product and how under the current policy proposals they will replace “traditional” affordable tenures in particular Shared Ownership.	59121 (bpha)
We should also be looking at retirement affordable housing.	60425 (Great and Little Chishill PC)
Affordable housing policy should support the principle of homes for NHS Staff (key workers), and support access for NHS staff to affordable housing, as a priority, where there is an evidenced need.	59200 (Cambridgeshire and Peterborough Clinical Commissioning Group)
Support for overarching policy objective but should specifically reference the need to ‘significantly increase the number of affordable ownership homes for those who can’t afford to buy their own homes’.	59494 (Pocket Living)
The policy objective to require the delivery of new affordable home ownership products on all sites is strongly supported.	59496 (Pocket Living)

Summary of issues raised in comments	Comments highlighting this issue
However it should specifically reference strong support for developments where the large majority (75%+) of homes are proposed as affordable home ownership products regardless of the size of these homes.	
This policy should include an exemption to First Homes and/or any other specific tenure split requirements where the large majority (75%+) of housing is proposed as affordable housing (as defined by Annex 2 of the NPPF).	59497 (Pocket Living)
The affordable housing target for schemes which provide a mix of Build to Rent and conventional homes should be a blend of both targets (apportioned according to the number of homes proposed). The targets for each housing type should be set with reference to relevant viability evidence.	59499 (Pocket Living)
Support intermingling of affordable homes throughout developments to increase social inclusion.	58280 (Histon & Impington PC)
Affordable housing should be placed within market housing.	57878* (Histon & Impington PC)
<p>Affordable housing organisations are causing problems by:</p> <ul style="list-style-type: none"> • Not enforcing rental agreements • Not tackling ASB • Selling on housing stock 	56994 (Trumpington Residents Association)

Summary of issues raised in comments	Comments highlighting this issue
Although affordable housing should be distributed across developments some clustering should be allowed to assist with delivery and on-going management.	58231 (Countryside Properties - UK Ltd)
Flexibility should be allowed for clusters to exceed the 15 unit restriction where this has been agreed with the relevant Registered Provider. The clustering of affordable housing units is generally a practical requirement for Registered Providers for management and maintenance reasons. As such, the policy should allow a degree of flexibility here.	60531 (Taylor Wimpey UK Ltd); 60591 (Countryside Properties)
Will this include building the modular pod type homes that could be made available for those who find themselves homeless?	58543 (Dr Hawkins)
Consideration should be given to a stepped approach. Any expansion of Cambourne should have a threshold of 30% for affordable homes. Older settlements have a much lower percentage of affordable housing and a 40% requirement on new development will take them towards the levels achieved in Cambourne.	59271 (Cambourne TC)
40% affordable housing requirement should apply to all development, not just schemes of over 10 dwellings.	56649 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
40% affordable housing requirement should be more rigorously enforced.	56815 (M Colville); 57554 (Stapleford PC); 58082 (B Marshall); 58280 (Histon & Impington PC); 59311 (M Berkson)
Policy H/AH: Affordable housing, should be strengthened and enforced as far as possible. We would like to see increasing numbers of small sites developed with affordable housing included.	59589 (Campaign to Protect Rural England - CPRE)
Affordability cannot be allowed to overturn Green Belt legislation, or landscape impact policies, or build on high quality agricultural land.	57554 (Stapleford PC)
Green field sites should be acquired at current use value and either (a) kept as social housing as a price related to the cost of land and construction cost or (b) if sold at market rate then the windfall land value increase should all go to government for use on infrastructure and not to developers/ landowners who did nothing socially valuable to earn it.	57046 (Dr Harrold)
Whether the continuation of a 40% affordable housing requirement is viable will be determined by the viability assessment: <ul style="list-style-type: none"> • The need for viability testing may arise in some areas 	57391 (Persimmon Homes East Midlands); 57913 (Martin Grant Homes); 58735 (The Church Commissioners for England); 59191 (Endurance Estates); 59742 (Endurance Estates); 60292 (Wheatley Group Developments Ltd); 60318

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Important to ensure that a whole Plan viability assessment, which takes into account infrastructure and emerging policy requirements, is undertaken at the appropriate time to ensure the policy is robust • Policy should include a review mechanism so viability can be reviewed in light of economic cycles, changing affordable tenures and rising build costs • The viability assessment should assess the different typologies available for the provision of specialist housing for older people • It may be necessary to include varied affordable housing requirements based on site type and location 	(Gladman Developments); 60346 (FC Butler Trust); 60354 (FC Butler Trust); 60382 (S & J Graves); 60392 (D Wright); 60462 (P, J & M Crow)
<p>Concern that the viability assessment has underestimated some of the costs in relation to policies and land values. It may be necessary to reduce the affordable housing requirement on some development typologies in order to ensure the local plan is consistent with paragraph 58 of the NPPF.</p>	60151 (Home Builders Federation)
<p>The provision of affordable housing contributions will need to be assessed taking into consideration those sites providing a</p>	59742 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
<p>mix of C2 and C3 uses and as such the policy approach must support the separate assessment of affordable housing contributions on these types of sites. The delivery of Affordable Housing on Extra Care sites is typically challenging. It is considered that practical issues should be addressed within the policy.</p>	
<p>Support for proposal that affordable homes should be provided on-site except for in the circumstances set out in paragraph 63 of the NPPF</p>	57283 (Universities Superannuation Scheme - Commercial)
<p>In line with paragraph 65 (b) of the NPPF, it should be made clear that purpose built accommodation for students is exempt from the requirement to provide a percentage of the total number of units as affordable.</p>	59094 (Metro Property Unit Trust)
<p>Small sites are more capable of delivering policy compliant levels of affordable housing than strategic sites due the latter's already high infrastructure burdens</p> <ul style="list-style-type: none"> • The plan should allocate more greenfield sites away from city where affordable housing will be more viable • More small sites will disperse affordable housing and provide more choice 	57111 (C King); 57184 (Southern & Regional Developments Ltd); 57261 (European Property Ventures - Cambridgeshire); 57308 (C Nutt); 58231 (Countryside Properties - UK Ltd); 58801 (Wates Developments Ltd); 58829 (Wates Developments Ltd); 58835 (Wates Developments Ltd); 59191 (Endurance Estates); 60346 (FC Butler Trust); 60354 (FC

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> Small sites can deliver affordable housing more quickly 	Butler Trust); 60382 (S & J Graves); 60392 (D Wright); 60462 (P, J & M Crow)
The restriction placed on development in 'Group Villages' as defined in the settlement hierarchy (of up to 8 dwellings/15 dwellings in exceptional circumstances) limits the ability of these areas to provide for any additional affordable housing as the threshold for triggering the requirement for affordable housing on schemes will not typically be met.	60327 (Daniels Bros - Shefford Ltd)
Support for proposal that where the development is solely for Build to Rent, there could be a proportionate reduction in affordable housing. However, this should also apply to developments where part of the residential uses are Build to Rent.	57283 (Universities Superannuation Scheme - Commercial)
The proposed policy direction wording should be amended to make it clear that on sites of 10 or more private residential dwellings 40% of new homes will be required to be affordable.	59094 (Metro Property Unit Trust)

H/ES: Exception sites for affordable housing

Hyperlink for all comments

Open this hyperlink - [Policy H/ES: Exception sites for affordable housing](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 23

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to exception sites for affordable housing. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

General support for the policy with parish councils and individuals seeking stronger controls whilst developers prefer a more flexible approach. The stronger controls suggested include: the requirement for local community support and/or leadership; robust evidence of local need; stricter criteria particularly in the green belt; local connection policies; no market housing; and prioritising the most sustainable communities and community led housing initiatives. Those arguing for more flexibility suggested: prioritising

key workers alongside local people; allowing schemes in the green belt and across all types of villages; and a more positive approach to market housing.

There was some concern that rural exception schemes could be used as a trojan horse to enable larger schemes or schemes on unsuitable sites to come forward. However, it was also suggested that rejected larger/unsuitable sites should be considered for rural exception schemes.

There was a preference for rural exception sites to be prioritised over First Homes exceptions sites with green belt controls seen as a key tool for achieving this.

Table of representations: H/ES - Exception sites for affordable housing

Summary of issues raised in comments	Comments highlighting this issue
Exception site policy is supported	58574 (T Hawkins), 58778* (Phase 2 Planning)
Exception sites should only be permitted if they have the full support of the local community/ parish council	56650 (Gamlingay PC), 56770 (Croydon PC)
Schemes should originate from and be directed by the local community, not a developer	57598 (R Pargeter)
Exception sites should only be created in response to objectively assessed local need	60796 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
Can a cascade be used to ensure unfilled properties are offered to households in neighbouring villages before the rest of the district?	58574 (T Hawkins)
Local connection criteria should be applied in perpetuity	60020 (Steeple Morden PC), 60096 (Guilden Morden PC)
Exception sites should be able to cater for key workers as well as local people. Key workers should be eligible on exception sites in the green belt	58981 (Roebuck Land and Planning Ltd)
Support policy emphasis on “community led housing initiatives such as community land trusts, co-housing and co-operatives”	60796 (Cambridge and South Cambridgeshire Green Parties)
A range of sites for rural exception schemes should be considered including parts of larger sites rejected through the planning process and other sites that have not come forward because they are unsuitable for larger scale housing	59801 (Histon & Impington CLT)
Exception sites should only be permitted where there is appropriate village infrastructure and public transport	58191 (Cllr Gough)
Stricter criteria should be used in permitting sites in the green belt	56816 (M Colville)

Summary of issues raised in comments	Comments highlighting this issue
"Rural exception sites will be allowed in the Green Belt only when it can be demonstrated that non Green-Belt alternative sites are not available" should be rigorously enforced.	60796 (Cambridge and South Cambridgeshire Green Parties)
Agree that First Homes Exceptions Sites should not be allowed in the green belt	58934 (Cambridge Past, Present & Future)
Should only be allowed outside existing planning boundaries in very exceptional circumstances where there is a very strong and demonstrable need, and there are no sites available within the boundary	57598 (R Pargeter)
Market housing should not be allowed in exception schemes	56650 (Gamlingay PC), 58281 (Histon & Impington PC)
Custom/ self build should be excluded from exception schemes as they will cause maintenance and management issues. If allowed, re-sales should be restricted for at least 5 years after completion	56650 (Gamlingay PC)
Exception sites can deliver affordable housing without the need for larger unsustainable market housing schemes	57743 (Bassingbourn-cum-Kneesworth PC)
An element of market housing should be allowed to support viability	57185 (Southern & Regional Developments Ltd), 57262 (European Property Ventures - Cambridgeshire), 57529 (H d'Abo)

Summary of issues raised in comments	Comments highlighting this issue
Sites in the green belt should be allowed	57185 (Southern & Regional Developments Ltd), 57262 (European Property Ventures - Cambridgeshire)
Further flexibility within the Green Belt should be allowed for traditional rural exception sites where there is a demonstrable local housing need	59215 (bpha)
Policy should not be overly restrictive on the scale of schemes permitted in Group Villages	57470 (Colegrove Estates)
Exception sites should be allowed in all settlements regardless of category provided they are proportionate	57529 (H d'Abo)
Should recognise that where there is evidence of need, schemes which meet this need should be supported even where it may be contrary to other policy objectives.	58778* (Phase 2 Planning)
First Homes exception sites should not replace traditional exception sites as the preferred type of delivery	59215 (bpha), 60796 (Cambridge and South Cambridgeshire Green Parties)
Concerned Exception Sites policy becomes a loophole for building on sites where development would not otherwise be permitted.	60796 (Cambridge and South Cambridgeshire Green Parties), 60426 (Great and Little Chishill PC)
Exception site policy should not be used to allow large scale market housing led schemes	59590 (Campaign for Protection of Rural England), 60426 (Great and Little Chishill PC)
Do not support this policy.	57587* (D Lott)

Summary of issues raised in comments	Comments highlighting this issue
No comment	57443 (Huntingdonshire DC)

H/HM: Housing mix

Hyperlink for all comments

Open this hyperlink - [Policy H/HM: Housing mix](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 23

Note

- Some representations included in this summary of representations table have been moved from the Homes and Wellbeing and Social Inclusion headings as the comments were specific to housing mix. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

Support, from Parish Councils and site promoters, for the approach that new developments should have a mix of housing sizes. However, site promoters are seeking more flexibility in the approach to allow for changing market conditions, changing requirements, and site specific circumstances. Site promoters suggest the policy does not stipulate percentages, includes indicative mix only or the ranges for some housing sizes and tenures are amended, and that each development should determine its own mix.

Parish Councils would like policy to address need for provision of bungalows and protection of existing smaller homes. Comments that housing mix should allow for the provision of homes for young single person households. A site promoter objects to the potential to include a planning condition that removes permitted development rights for extensions where that would cause harm to the housing mix. Another site promoter highlights that use class C2 schemes with self-contained dwellings will not always be able to provide the mixes suggested due to their different requirements.

Table of representations: H/HM - Housing mix

Summary of issues raised in comments	Comments highlighting this issue
Good mix is essential for all ages / need a mix of dwellings within a development.	56771 (Croydon PC), 56746* (Croydon PC), 58283 (Histon & Impington PC)
Welcome approach to identify broad ranges as recommendations but with encouragement to work with a Registered Provider, the Council's housing team, and Greater Cambridge Shared Planning Service to discuss final mix for a new development.	58595 (Marshall Group Properties)
Support for approach that new developments should have an appropriate mix of housing sizes.	58822 (Trumpington Meadows Land Company), 58905 (CBC Limited, Cambridgeshire County Council and a private family trust)
Support for approach that provides recommendations and that these are set out as a range, as this will allow flexibility to respond to changing market conditions and requirements.	59532 (Countryside Properties - Bourn Airfield), 60532 (Taylor Wimpey UK Ltd), 60592 (Countryside Properties - Fen Ditton site)

Summary of issues raised in comments	Comments highlighting this issue
Support for policy applying to 10 or more dwellings, but would also suggest a higher threshold of 1 hectare, as housing mix on smaller sites will be dictated by size, location and topography.	60149 (Home Builders Federation)
Smaller units (1 & 2 bed) should be designed so they cannot be extended. Historically, smaller units have been extended reducing the pool of smaller homes available.	56651 (Gamlingay PC)
Need for bungalows – to address the overall lack of bungalows in the area and for downsizers.	57744 (Bassingbourn-cum-Kneesworth PC), 58472 (Linton PC)
Need a much higher proportion of ‘Homes for Life’.	58283 (Histon & Impington PC)
Policy is about right.	60427 (Great and Little Chishill PC)
Object to potential for a planning condition to be attached that removes permitted development rights for extensions that would cause harm to the housing mix – this is overly cautious and too restrictive.	57186 (Southern & Regional Developments Ltd)
Support for flexibility to allow exceptions to the proposed housing mix where justified by specific circumstances.	57284 (Universities Superannuation Scheme – Commercial), 59502 (Pocket Living)
Policy must recognise that housing offer on some sites is tailored to meet specific needs rather than a broader housing mix. Need to include flexibility to allow for important locations	58905 (CBC Limited, Cambridgeshire County Council and a private family trust)

Summary of issues raised in comments	Comments highlighting this issue
to develop housing mix for their specific needs and site specific policies for these sites.	
Wording needs to be more flexible and not stipulate set percentages. Should be worded to be flexible to changing needs over time. Will ensure policy does not become out of date, as well as allowing needs to be met over the plan period, schemes can be designed to meet specific needs or character of the area.	57393 (Persimmon Homes East Midlands), 58555 (Deal Land LLP)
Recommend that avoid prescriptive housing mix requirement, and instead allow schemes to determine own appropriate mix based on location. Policy could include an indicative mix to be encouraged if appropriate. Housing provided needs to reflect the needs across the area and the policy should be flexible to recognise that housing needs will change over the plan period.	60319 (Gladman Developments)
Policy should ensure that regard also had to relevant and up to date evidence, as proposed housing mix is a snapshot in time.	60149 (Home Builders Federation)
Policy should include specific reference to 'the nature and location of the site and the type of housing proposed' to	59502 (Pocket Living)

Summary of issues raised in comments	Comments highlighting this issue
ensure the right homes are built in the right locations. Town centres are better suited to smaller households. Also, exact mix may depend on whether the homes are for rent or sale.	
Policy should include flexibility on unit mix where majority of proposed housing is affordable, to prevent them being unattractive or less viable. Allowing some schemes to focus on particular sizes to encourage delivery will make an important contribution to meeting local needs, whereas requiring all schemes to meet a specific mix will result in a reduction in housing delivery.	59504 (Pocket Living)
Policy should include specific reference to the need to “provide affordable ownership housing for young single person households”.	59506 (Pocket Living)
The proposed proportion of 4+ bed market housing in the rural area is too high and should be reduced.	56651 (Gamlingay PC)
Flats or houses for young, single professionals are needed as there is no post graduate provision by the universities.	59278* (Great Shelford PC)
If percentages are retained in the policy, 3 bed market dwellings should be amended to 40-60% and 4 bed market dwellings should be amended to 20-35% for both Cambridge	57393 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
and South Cambridgeshire - to be in line with housing needs survey which recognises the need for family homes, and increasing 3 bed homes will support downsizing.	
Prescriptive nature of tenure mix for market homes is not robust and should be amended to enable developers to deliver a mix of homes that will respond to local market demand.	58555 (Deal Land LLP)
Consideration needed on a site by site basis for Use Class C2 schemes where it is not always appropriate or viable to provide larger properties. Policy needs to be sufficiently flexible to recognise that specialist housing for older people serves a different market with specific requirements.	59743 (Endurance Estates)
Approved developments such as Waterbeach or Bourn Airfield should be made to change their plans if a good housing mix is not provided.	57587* (D Lott)
No comment.	57444 (Huntingdonshire DC)

H/HD: Housing density

Hyperlink for all comments

Open this hyperlink - [Policy H/HD: Housing density](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 31

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to housing density. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

General support for the policy, with developers supporting that there is no specific density figure being required, seeking to make the most of sustainable sites, and noting that the policy adheres to NPPF. Other comments include that it should be a design-led approach, appropriate to local circumstances, and that the drive for higher density should not override consideration of landscape,

townscape and heritage impacts from inappropriately tall buildings. Parish councils were concerned that rural and non-rural areas should not be the same density.

Comments that lockdowns underscored the crucial role of green spaces and corridors for the mental and physical health, especially for those living in high density housing, and that the policy should ensure accessible green space provision and provide opportunities for food growing where private gardens are not provided.

It was suggested that the policy should be amended to require smaller units on higher density sites in town centres and close to transport interchanges and on small, constrained sites, as these are less suited to families. There was a suggestion the policy should allow room for extensions to help families adapt and remain within their homes and communities. Also, to address concerns that at higher densities parking and hard landscaping areas increase the risk of surface water flooding, that the policy should require use of permeable materials.

Wide ranging concerns included that there is a need for proper family homes with gardens, higher densities will create the 'slums of tomorrow' leading to anti-social behaviour, crime, anxiety and mental ill-health, that a lack of parking impacts on community cohesion, and that there have been poor schemes in the past, with the Cambridge Station area mentioned. Concern that if densities are increased too much it might decrease the quality of life, and might impact the quality of the city, including its economic prospects as companies will not want to move here.

Table of representations: H/HD - Housing density

Summary of issues raised in comments	Comments highlighting this issue
Support policy	<p>Public Bodies</p> <p>57745 (Bassingbourn-cum-Kneesworth PC)</p> <p>Other Organisations</p> <p>59149 (University of Cambridge), 60480 (Anglian Water Services Ltd),</p> <p>Developers, Housebuilders and Landowners</p> <p>57285 (Universities Superannuation Scheme), 58599 (Marshall Group Properties), 58823 (Trumpington Meadows Land Company a joint venture between Grosvenor Britain & Ireland and Universities Superannuation Scheme), 60162 (U&I PLC and Town), 60320 Gladman Developments, 60533 (Taylor Wimpey UK Ltd) 60593 (Countryside Properties – Fen Ditton Site)</p>
Support policy, but with caveats including:	59508 (Pocket Living), 59510 (Pocket Living duplicate comment)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Sites located in Town Centres and/or close to transport interchanges are highly suited to increased densities of housing and people. They are typically however less suited to families. Policy should make reference to the need to deliver smaller unit sizes, such as 1 bedroom 1 person homes, in these locations. • The policy should specifically recognise that smaller more constrained sites are likely to better suited to smaller unit types (i.e. those designed for individuals instead of large families). Constrained sites tend to have fewer opportunities for providing private amenity space and play space. Encouraging roof gardens and other community spaces should be sought in these locations. 	
<p>Support policy with caveat that:</p> <ul style="list-style-type: none"> • Standards for accessible green space provision are met (see also BG/EO). • Building height is not mentioned in this section: drive for higher housing density must not override 	<p>60797 (Cambridge and South Cambridgeshire Green Parties), 57779* (Carbon Neutral Cambridge)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>considerations such as landscape impacts from inappropriately tall buildings.</p> <ul style="list-style-type: none"> Where people do not have private gardens, it is especially important that opportunities for local food growing - such as allotments, community farming schemes - are provided. There needs to be plenty of public realm green space. 	
Support the policy adhering to the NPPF	60533 (Taylor Wimpey UK Ltd), 60320 (Gladman Developments), 60593 (Countryside Properties – Fen Ditton Site)
Support no specific density figure being required	60533 (Taylor Wimpey UK Ltd), 60593 (Countryside Properties – Fen Ditton Site)
No comment	57455 (Huntingdonshire DC)
<p>Object to policy on grounds that:</p> <ul style="list-style-type: none"> High densities inappropriate for bringing up a family. Instead need ‘proper’ family homes needed with generous gardens. High densities will lead to ‘slums of tomorrow’ which will lead to anti-social behaviour, crime, anxiety and mental ill-health. 	56531 (D Kelleway), 57564 (Save Honey Hill Group) 57624 (J Pratt), 57695 (J Conroy), 59143 (F Gawthrop), 59835 (Dry Drayton PC), 59242* (Teversham PC)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Could lead to small builds with little access to outside green space. • Mistakes of past have left high-rise housing with little green infrastructure, leading for a poor environment and the denial of open space for residents. • Increasing population within such as small city could be a major error. If it impacts on quality of the city, then this will not meet the economic objectives as well as companies might not want to move here. • Has resulted in poor schemes, notably around Cambridge Station. 	
Density should be appropriate to local circumstances	56652 (Gamlingay PC)
Don't underestimate the value of the Clare Hall Sports Ground and ecological corridor along the Brook as a vital 'green lung' for city inhabitants. Covid-19 lockdowns underscored the crucial role of this area for the mental and physical health of local inhabitants, especially those living in high density housing.	56697 (Margery Evans)
Our quality of life depends on reasonable space both inside and outside the home.	56772 (Croydon PC)

Summary of issues raised in comments	Comments highlighting this issue
Competition for parking spaces has an undesirable impact upon community cohesion. Request further use of journey budgets to determine housing numbers in rural areas as this is a useful instrument to restrain development in rural areas and reduce this competition for parking.	57119 (P Bird)
If a community is to become stable, each householder needs sufficient room for extensions, etc. which will help young families to stay in the development. Growth of individual properties should be considered when assessing appropriate housing densities.	57119 (P Bird)
In the previous SCDC Local Plan a density in rural sites was limited to 30 dwellings per hectare. Glad to see that you have gone away from this strict prescription	57119 (P Bird)
The density of rural areas must not be the same as non-rural areas. Great Shelford Village does not wish to see high density.	58284 (Histon & Impington PC), 59277 (Great Shelford PC)
The minimum sizes of homes is to be defined and enforced without exception.	58284 (Histon & Impington PC)
Support the delivery of appropriate site-specific net densities, taking advantage of opportunities to deliver higher densities	58823 (Trumpington Meadows Land Company a joint venture between Grosvenor Britain & Ireland and Universities)

Summary of issues raised in comments	Comments highlighting this issue
on sites with good accessibility. It is important that sites in the most sustainable locations are used in the most efficient way.	Superannuation Scheme) 59149 (University of Cambridge), 60533 (Taylor Wimpey UK Ltd)
Support design led approach to determine optimum capacity of sites and appropriate density to respond to local character, especially in villages.	60140 (C Blakeley)
Council previously failed to secure sufficient open space in developments, leading to poor environment for residents, and standard response has been to take money under section 106 agreements that is spent elsewhere.	59143 (F Gawthrop)
Cambourne Town Council requests that careful consideration should be given to densities to ensure there is sufficient space for open space and bio-diversity can be incorporated into a new development. Positive lessons should be learnt from the green space provision in Cambourne.	59303 (Cambourne Town Council)
Adequate and excellent allotment provision can help to make dense developments sustainable: all residents have access to garden space near their home.	59305 (D Fox)
Any policy should specifically also reference consideration of potential impacts on the historic environment, including heritage assets and the wider townscape ad landscape.	59683 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
HE welcome a Site-specific design led approach with site and area design codes to guide development.	59683 (Historic England)
Commentator questions whether this will be controlled?	60428 (Great and Little Chishill PC)
One issue that higher density developments face is the tendency for car parking provision and hard landscaping to increase risks on and off site from surface water flooding. Coupled with policy H/GL on the loss of garden land Anglian Water would ask that the policy, its implementation by the Councils and monitoring/ enforcement maximise the use of permeable materials and prevent hard landscaping being introduced post development.	60480 (Anglian Water Services Ltd)
Densely developed areas create ill health and should not be allowed.	57587* (D Lott)

Comments relating to specific sites

Summary of issues raised in comments	Comments highlighting this issue
Relating to policy H/HD, if the density is increased too much, this might decrease the quality of life and harm the economic objectives of the plan as companies might not want to move	57564 (Save Honey Hill Group), 57624 (J Pratt) 57695 (J Conroy)

Summary of issues raised in comments	Comments highlighting this issue
here. This is of particular relevance to the size and scale of S/NEC / NECAAP.	
In relation to H/HD, it is important to apply a design-led approach to determine the optimum development capacity of sites in order to make the best use of land. See in particular our response to S/NWC: North West Cambridge.	59149 (University of Cambridge)
In relation to H/HD, Marshall is supportive of a design-led approach to density that encourages each site to make the best use of land. Marshall has recently appointed specialist landscape architects who will be advising on the opportunities and constraints across the Cambridge East site and what these mean for densities and heights that can be supported across the development. It is intended that this work will feed into the discussions that Marshall will continue with the GCSP in order to help in demonstrating the capacity of the site and begin to establish design principles.	58599 (Marshall Group Properties)

H/GL: Garden land and subdivision of existing plots

Hyperlink for all comments

Open this hyperlink - [Policy H/GL: Garden land and subdivision of existing plots](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 19

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to garden land and subdivision of existing plots. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

General support for the policy from a range of public bodies and third sector organisations, although there were some additional comments that gardens can help mitigate surface water flooding and provide buffer zones to ecological sites, the policy needs to be strongly worded to prevent detrimental impact on neighbours, and there is a need to consider each proposal on a case by case basis. A parish council commented that green space is needed around properties in rural settings and developments in villages

should have gardens of reasonable size. One individual was opposed to sub-division of plots unless on very large plots where in keeping with the surroundings.

Concern was raised that there is often little biodiversity mitigation required for in-fill developments and that there has been a gradual loss of green habitat and trees, it was suggested the policy should be strongly worded to require biodiversity mitigation/enhancement. Also, Anglian Water were concerned that parking and hard landscaping areas increase the risk of surface water flooding and suggest the policy should require use of permeable materials.

Table of representations: H/GL - Garden land and subdivision of existing plots

Summary of issues raised in comments	Comments highlighting this issue
Support policy	Individuals 60141 (C Blakeley)

Summary of issues raised in comments	Comments highlighting this issue
	<p>Public Bodies</p> <p>56653 (Gamlingay PC), 56920 (Cllr. D Sergeant/ West Wickham PC), 57746 (Bassingbourn-cum-Kneesworth PC), 59684 (Historic England), 59836 (Dry Drayton PC), 60021 (Steeple Morden PC), 60097 (Guilden Morden PC)</p> <p>Third Sector Organisations</p> <p>56996 (Trumpington Residents Association), 57108 (Fulbourn Swifts Group)</p>
<p>Support policy, but with caveats including:</p> <ul style="list-style-type: none"> • Gardens can help mitigate surface water flooding + would support introduction of a condition that permeable surfaces must be used if gardens are converted to driveways. • This policy should specifically recognise the importance of large gardens adjoining sites of biodiversity and ecological importance as buffer zones that should be protected from development by 	<p>57972 (E Davies), 56773 (Croydon PC), 58142 (M Asplin), 58937 (Cambridge Past, Present & Future), 60798 (Cambridge and South Cambridgeshire Green Parties)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>subdivision of existing plots which would damage such buffer zones</p> <ul style="list-style-type: none"> • This needs careful consideration on a case-by-case basis, especially with regard to access and neighbours. • The policy should be balanced in reinforcing the positive benefits reflected elsewhere within the Plan, such as opportunities for appropriate development, a source of windfall housing and sustainment of communities. • The policy needs to be strongly worded and vigorously applied to prevent any detrimental impact on existing neighbours through changes to the character of the area and massing of structures and through loss of trees. 	
Careful though needs to be given to each application	60429 (Great and Little Chishill PC)
Where planning permission is required for in-fill developments there is often little mitigation required for biodiversity loss + this seems to be causing a steady reduction in the available green habitat within the city suburbs and villages + it is likely	57108 (Fulbourn Swifts Group)

Summary of issues raised in comments	Comments highlighting this issue
that the value of the green networks is being reduced. We suggest that this policy should include specific mention of forms of mitigation/enhancement for biodiversity that will be required where permission is given to develop such sites to address the above issue.	
No comment	57446 (Huntingdonshire DC)
Under the current Local Plan, Cambridge Past, Present & Future has witnessed approval of developments which have resulted in significant loss of trees, so the policy needs to be strongly worded and vigorously applied.	58937 (Cambridge Past, Present & Future)
Green space is needed around properties in rural settings. Developments in and around the villages should have gardens of a reasonable size.	59276 (Great Shelford PC)
One issue that higher density developments face is the tendency for car parking provision and hard landscaping to increase risks on and off site from surface water flooding. In relation to policy H/HD coupled with policy H/GL Anglian Water would ask that the policies, their implementation by the Councils and monitoring/ enforcement maximise the use of	60481 (Anglian Water Services Ltd)

Summary of issues raised in comments	Comments highlighting this issue
permeable materials and prevent hard landscaping being introduced post development.	
Garden land must not be developed. Sub-division of existing plots must not be allowed, unless on very large plots where in keeping with surroundings.	57587* (D Lott)

H/SS: Residential space standards and accessible homes

Hyperlink for all comments

Open this hyperlink - [Policy H/SS: Residential space standards and accessible homes](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 21

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to residential space standards and accessible homes. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

Support for use of nationally described space standards from a mix of respondents. However, site promoters and housebuilders have asked for additional evidence and justification for their use as required by the NPPF. A statement that there are no nationally prescribed standards for use class C2 schemes.

General support for requirements for accessible and adaptable homes – meeting M4(2) and M4(3) standards. However, specific comments seeking higher proportion of homes required to meet M4(3) standards and requesting that this applies to both market and affordable homes. An individual is seeking amendments from these national standards. Site promoters and housebuilders suggest that additional evidence and justification is needed, and that an ageing population alone is not a reason to seek these standards.

Support for requirement that new homes should have their own private amenity space, but with some respondents seeking flexibility as they do not believe that it is always necessary. A request that student accommodation is exempt from this requirement.

Table of representations: H/SS - Residential space standards and accessible homes

Summary of issues raised in comments	Comments highlighting this issue
Support the policy.	57447 (Huntingdonshire DC), 57747 (Bassingbourn-cum-Kneesworth PC), bpha (59223), 60430 (Great and Little Chishill PC), 60594 (Countryside Properties - Fen Ditton site)

Summary of issues raised in comments	Comments highlighting this issue
Broadly support requirement for nationally described residential space standards, but should be treated as bare minimum.	60799 (Cambridge and South Cambridgeshire Green Parties)
Okay, provided that developers don't ask for retrospective changes.	59837 (Dry Drayton PC)
Use of nationally described residential space standards is supported.	56530 (D Kelleway), 59512 (Pocket Living), 60534 (Taylor Wimpey UK Ltd), 59242* (Teversham PC)
Essential as people should be able to own a home for life and not need to move for accessibility.	56774 (Croydon PC)
Residential conversions and homes created through change of use of a building should be required to meet the nationally described residential space standards.	56530 (D Kelleway), 59242* (Teversham PC)
Nationally described residential space standards – the Councils need to provide evidence and justification as required by NPPF for inclusion in Greater Cambridge Local Plan. Viability is key.	57395 (Persimmon Homes East Midlands), 60146 (Home Builders Federation), 60227 (Thakeham Homes Ltd), 60556 (Thakeham Homes Ltd)
Councils should lobby for nationally described residential space standards to become part of Building Regulations rather than an optional part of the planning system.	56530 (D Kelleway), 59242* (Teversham PC)
Supportive of M4(2) and M4(3) requirements.	60534 (Taylor Wimpey UK Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Support for M4(3) provision, although proportion required should be higher.	56654 (Gamlingay PC)
In considering M4(3) standards, this should not just relate to the initial occupier / Should be guards against making properties less accessible in future.	56654 (Gamlingay PC), 57599 (R Pargeter)
Policy needs to include a proportion of market housing to be M4(3) wheelchair adaptable standards to meet the needs identified in Housing Needs of Specific Groups study.	57447 (Huntingdonshire DC), 57599 (R Pargeter)
Huntingdonshire DC successfully introduced higher standards in adopted Local Plan, and consistency of approach across the area may increase viability.	57447 (Huntingdonshire DC)
An ageing population alone is not a reason for increase M4(2) and M4(3) requirements, otherwise these standards would be required through Building Regulations.	57395 (Persimmon Homes East Midlands)
Need for evidence as required by PPG for any M4(2) and / or M4(3) standards.	57395 (Persimmon Homes East Midlands), 60227 (Thakeham Homes Ltd), 60556 (Thakeham Homes Ltd)
With sufficient evidence, if there is still a requirement for all homes to meet M4(2) standard, there needs to be an element of flexibility in the policy for schemes where its not achievable.	57395 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
Specific requirements in relation to toilet layouts and step free access sought that amend the M4(2) standards.	57599 (R Pargeter)
Concerns that homes for disabled occupants could have smaller floor area than for able bodied.	58286 (Histon & Impington PC)
Suggest that some consideration is given to the accessibility of the existing stock and degree to which those with mobility difficulties will be able to adapt their own homes.	60146 (Home Builders Federation)
Support requirement that new homes should have private amenity space.	58827 (Trumpington Meadows Land Company)
Policy needs to recognise that not always possible for every home to have direct access to private amenity space, and that it is not always necessary.	59512 (Pocket Living)
Generous minimum private amenity space standards are needed.	56530 (D Kelleway), 59242* (Teversham PC)
Expect definition of amenity space standards in future drafts of Greater Cambridge Local Plan that will be subject to public consultation.	57395 (Persimmon Homes East Midlands)
Policy should confirm that student accommodation is exempt.	59098 (Metro Property Unit Trust)

Summary of issues raised in comments	Comments highlighting this issue
Policy should include flexibility for requirements on constrained / unfeasible sites, so that they are not discouraged from being delivered.	59512 (Pocket Living), 60146 (Home Builders Federation)
Requirements need to be factored into considerations of site capacity and viability of the sites and the Local Plan as whole to ensure deliverability.	60594 (Countryside Properties - Fen Ditton site)
There are no nationally prescribed space standards for Use Class C2 schemes. However, the operator will provide a range of units to meet the intended housing mix.	59744 (Endurance Estates)

H/SH: Specialist housing and homes for older people

Hyperlink for all comments

Open this hyperlink - [Policy H/SH: Specialist housing and homes for older people](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 18

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to specialist housing and homes for older people. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

General support for a policy focus on specialist housing and homes for older people from parish councils and developers. Parish councils want housing for older people to be integrated within wider communities and close to local services and transport. They also call for more independent living opportunities for the more able elderly to allow downsizing and for accommodation to be sufficiently flexible to allow people to stay in their homes if their mobility decreases. Developers want more land set aside for

specialist housing and homes for older people with specific allocations to avoid crowding out from other housing types. They argue for a greater variety of sites to increase choice for older people. They also argue that the First Proposals are too dependent on urban extensions and new settlements and call for more brownfield and windfall sites in urban and suburban locations alongside release of land in the green belt. One developer supports the continuation of the existing approach used in Cambridge based on the criteria-based Policy 47: 'Specialist Housing' within the 2018 Cambridge Local Plan.

Table of representations: H/SH - Specialist housing and homes for older people

Summary of issues raised in comments	Comments highlighting this issue
Policy supported	57748 (Bassingbourn-cum-Kneesworth PC), 60800 (Cambridge and South Cambridgeshire Green Parties)
Specialist housing for older people should be treated as a priority	60431 (Great and Little Chishill PC)
Older people should be housed within mixed developments rather than isolated or clustered	56775 (Croydon PC), 59275 (Gt Shelford PC)
Specialist housing for older people should be planned alongside the types of facilities that older people need	60800 (Cambridge and South Cambridgeshire Green Parties)
Specialist housing for older people is important and should be developed near local shops and good transport.	57587* (D Lott)
GCLP evidence base under-estimates the need for specialist housing for older people, especially extra-care housing	59747 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
The current development plan provision does not meet national policy requirements	59747 (Endurance Estates)
The GCLP should set a target for specialist housing for older people with an adequate supply maintained and effective monitoring to enable shortfalls to be identified and addressed	60145 Home Builders Federation
Provision of specialist housing should be determined on a case-by-case basis when dealing with large developments <ul style="list-style-type: none"> • A threshold should be set at which specialist housing for older people should be included in larger developments 	57286 (Universities Superannuation Scheme - Commercial), 60535 (Taylor Wimpey UK Ltd), 60595 (Countryside Properties)
Requirements for specialist housing should be explicitly set out in allocation policies <ul style="list-style-type: none"> • Providers of specialist housing for older people can't compete for sites with mainstream housebuilders 	57397 (Persimmon Homes East Midlands), 58728 (Scott Properties), 59747 (Endurance Estates), 60145 (Home Builders Federation)
There is a need for more, and a greater variety of, sites for specialist housing to ensure sufficient delivery in the early years of the plan and that people have choices about where to live	58728 (Scott Properties), 59747 (Endurance Estates), 60145 (Home Builders Federation)
The First Proposals are too dependent on urban extensions and new settlements for the provision of specialist housing for older people	59747 (Endurance Estates), 60145 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
Specialist housing for older people should be encouraged on brownfield and windfall sites in urban and suburban locations to enable people to stay in their communities	60145 (Home Builders Federation)
Allowing more growth in villages helps to sustain local services and facilities which further helps older people who have a higher propensity to live in rural communities	58728 (Scott Properties)
Disagree with the view that the need for specialist accommodation does not justify the exceptional circumstances to release land from the Green Belt	58728 (Scott Properties)
The number of houses suitable for wheelchair users should be based on estimates of the wheelchair user population and should be sufficient to provide people with choices about where to live	57601 (R Pargeter)
<p>There should be more independent living opportunities for the more able elderly which will also encourage downsizing, thereby freeing up larger homes for larger families</p> <ul style="list-style-type: none"> • Need more bungalows with appropriate adaptations and flexibilities for older people and downsizers 	59462 (G Rose), 58473 (Linton PC)
Housing for older people should be suitable until end of life and not require older people to move if mobility decreases	58288 (Histon & Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Support for continuation of existing approach used in Cambridge based on the criteria-based Policy 47: 'Specialist Housing' within the 2018 Cambridge Local Plan, which outlines four criteria that must be met for development to achieve a net loss of specialist residential floorspace	58830 (Trumpington Meadows Land Company a joint venture between Grosvenor Britain & Ireland and Universities Superannuation Scheme)
No comment	57448 (Huntingdonshire DC)

H/CB: Self and custom build homes

Hyperlink for all comments

Open this hyperlink - [Policy H/CB: Self and custom build homes](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 28

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to self and custom build homes. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

Some general support for the policy, however detailed comments from developers / housebuilders on specifics of the proposed approach. Support for requirement for self and custom build homes being linked to demand on the Self and Custom Build Register – site promoters highlight that this will mean that continual monitoring is required to ensure up to date information is available. Comments from some that the proposed approach will not deliver the necessary plots to meet the demand from the register and

that the plots will not meet the wishes of those on the register, but this is countered by others that consider that the proposed approach will deliver more plots than there is demand for. Requests for further evidence and justification for the proposed approach, including the requirement for 5% self and custom build homes on major developments. Site promoters suggest that the policy should have a more flexible approach that supports self and custom build developments on the edge of settlements. Developers / housebuilders have highlighted concerns about the viability of the proposed approach and also that the marketing period for a custom and self build plot before it can be built without the self and custom build restrictions should be reduced to 6 months. Home Builders Federation suggest that including self and custom build plots within major developments adds to the complexity of their delivery. Specific request for custom finish to be included within the policy to enable high density developments to be able to comply with the requirements.

Table of representations: H/CB - Self and custom build homes

Summary of issues raised in comments	Comments highlighting this issue
Support / welcome a policy / broadly support.	57749 (Bassingbourn-cum-Kneesworth PC), 60321 (Gladman Developments), 60801 (Cambridge and South Cambridgeshire Green Parties), 60536 (Taylor Wimpey UK Ltd), 60228 (Thakeham Homes Ltd)
Support, provided there is suitable land available.	56777 (Croydon PC)
NPPF does not stipulate requirements for sites to include custom or self build homes, therefore positive that the policy notes that there must be demand on the register for this to be a requirement.	60536 (Taylor Wimpey UK Ltd)

Summary of issues raised in comments	Comments highlighting this issue
There should be a condition on the length of time the occupant must remain before the dwelling can be sold.	56655 (Gamlingay PC)
Where there are existing dwellings nearby, the timescales for build out of self or custom build homes mean there is likely to be a problem of noise and disturbance.	56655 (Gamlingay PC)
Importance of providing sufficient custom build plots for meeting local housing need has not been adequately addressed.	59024 (I Beamon)
The proposed policy direction of only allowing within large developments or where residential development would be allowed, means that based on the development strategy, this will only allow for self and custom build plots in urban areas, and not meet the demand in rural areas.	56960 (S Jevon and D Raven)
Custom build is not in conflict with local rural exception sites policies, national exception sites policies or emerging First Homes policies.	59024 (I Beamon)
Broader approach is required to ensure that demand on the self build register can be met and homes can be built where people choose to live. In accordance with NPPR para 62, should allow appropriate small and medium sized sites to	56960 (S Jevon and D Raven)

Summary of issues raised in comments	Comments highlighting this issue
come forward adjacent to or well related to all tiers of existing settlements.	
Policy is overly prescriptive and Council should promote self and custom build opportunities on the edge of villages.	57187 (Southern & Regional Developments Ltd), 57265 (European Property Ventures – Cambridgeshire)
Proposed approach will not bring forward the required amount of self and custom build plots in the right locations. More positive approach is needed that allows self and custom build developments in similar locations to rural exception sites – at Group Villages or above, where services and facilities are provided.	57469 (Colegrove Estates)
Approach that promotes bespoke developer-led self and custom build housing is needed to ensure need is met, including supportive policy for small and medium sized sites that are wholly self and custom build.	59797 (Leaper Land Promotion)
Stronger policy basis needed for custom build sites that are not part of major developments.	59024 (I Beamon)
More focussed policy split across the two administrative areas would encourage self build plots in the right locations to meet demand. Illogical for the current registers to be combined	57312 (C Sawyer Nutt), 59204 (Endurance Estates), 60344 (FC Butler Trust), 60355 (FC Butler Trust), 60370 (The Critchley Family), 60393 (D Wright), 60461 (P, J & M Crow)

Summary of issues raised in comments	Comments highlighting this issue
since many will have preferred locations and few will have a search area as wide as Greater Cambridge.	
Recommend an element of flexibility, particularly to allow for negotiation on basis of demand or viability, and to ensure that housing delivery is not delayed or prevented.	60321 (Gladman Developments)
Should be tested through viability assessment to ensure cumulative impacts of all policy requirements for not put implementation of the Local Plan at risk.	60321 (Gladman Developments)
Concern is raised about the viability of requiring a percentage of self build plots on new developments.	57187 (Southern & Regional Developments Ltd), 57265 (European Property Ventures – Cambridgeshire)
Proposed approach is likely to result in developers of large sites arguing at a later date that due to viability or construction issues they cannot deliver the agreed requirement of self and custom build homes. This is a concern given the demand.	57469 (Colegrove Estates)
Do not support this policy.	57587* (D Lott)
Object – need further evidence to justify 5% self or custom build dwellings within new developments. Topic Paper only sets out high level figures and references to experiences of	57398 (Persimmon Homes East Midlands)

Summary of issues raised in comments	Comments highlighting this issue
agents. Need a more detailed evidence base to show why 5% is justified.	
Plots provided on sites of 20 or more dwellings are unlikely to meet the requirements of those on the register.	59024 (I Beamon)
Do not consider a blanket approach as suggested for developments of 20 or more dwellings is appropriate or feasible. Instead should be directed to key strategic allocations and should be based on identified need.	60228 (Thakeham Homes Ltd), 60557 (Thakeham Homes Ltd)
Need more information on the requirement for 5% self and custom build within new developments, to understand how it will impact on a development.	58833 (Trumpington Meadows Land Company)
The 5% requirement would deliver up to 2,220 homes based on the Local Plan housing requirement of 44,400 homes – more than five times the number of people on the register. Policy aspiration is therefore not justified by demand from register.	60596 (Countryside Properties – Fen Ditton site)
No evidence to support the policy that shows how the requirement will need the demand, and no information on what has been agreed on sites where custom build homes have been secured.	59024 (I Beamon)

Summary of issues raised in comments	Comments highlighting this issue
Needs a cascade mechanism to enable homes to revert back to market dwellings if self build plots are not taken up.	60321 (Gladman Developments)
<p>Cascade mechanism should be amended to 6 months, as needs to be as short as possible:</p> <ul style="list-style-type: none"> • if there is demand for self or custom build the plot would be sold within this timeframe. • unsold plots should not be left empty to detriment of neighbours. • otherwise could affect overall timescales for delivery of development or associated costs for the development due to need to revisit earlier phases. 	57398 (Persimmon Homes East Midlands), 60144 (Home Builders Federation), 60536 (Taylor Wimpey UK Ltd), 60596 (Countryside Properties – Fen Ditton site)
Cascade mechanism should be lengthened to 24 months to allow those wanting to self build to make a choice – 12 months is not long enough.	58289 (Histon & Impington PC)
<p>Provision of self and custom build plots within developments adds to their complexity:</p> <ul style="list-style-type: none"> • difficult to co-ordinate delivery of these individual plots in amongst delivery of remainder of development 	60144 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> development of single plots by individuals creates health and safety issues when multiple contractors and large machinery operating on remainder of site 	
<p>Policy wording needs to support custom finish, as otherwise high density developments like North East Cambridge are unlikely to be able to comply with the requirements.</p>	60163 (U&I PLC and TOWN)
<p>Object as proposed approach seems to reflect existing adopted policy for South Cambridgeshire and published data suggests that while 479 people have been added to the register since October 2017, no permissions have been granted. Therefore, existing policy is not working and so would be inappropriate to carry forwards.</p>	59797 (Leaper Land Promotion)
<p>Evidence would suggest relatively high levels of demand but unclear whether this demand has been confirmed by reviewing registers. Reviews of registers in other places have seen numbers fall.</p>	60144 (Home Builders Federation)
<p>To be found sound, need to provide evidence of how many plots would be delivered through the policy. Policy needs to be reasonably related to demand.</p>	60144 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
Evident that demand from those on Greater Cambridge Self Build Register cannot be met by implementable planning permissions.	59024 (I Beamon)
Self Build Register is inadequate evidence base as does not provide any detailed information on plots being considered and their location. Assumption is that officers have not identified suitable plots.	59024 (I Beamon)
Continual monitoring will be required so that the register is updated to reflect the permissions that have been granted and to record any self or custom build plots that revert to market dwellings if not taken up at the end of the marketing period.	57312 (C Sawyer Nutt), 59204 (Endurance Estates), 60344 (FC Butler Trust), 60355 (FC Butler Trust), 60370 (The Critchley Family), 60393 (D Wright), 60461 (P, J & M Crow)
Local authority needs to set out how different approaches in addition to planning policy have been considered.	57398 (Persimmon Homes East Midlands)
What is the selection criteria for inclusion on the register? Can residents from outside of Greater Cambridge bid for sites?	60801 (Cambridge and South Cambridgeshire Green Parties)
Windfall allowance should not include custom build plots – specific sites should be identified to meet demand from register. Should be considered in the same way as local	59024 (I Beamon)

Summary of issues raised in comments	Comments highlighting this issue
affordable housing need is dealt with through rural exception sites for affordable housing.	
Will policies CC/NZ (net zero buildings) and CC/WE (water efficiency) apply to self-and custom-build homes?	60801 (Cambridge and South Cambridgeshire Green Parties)
<p>Specific developments promoted that provide opportunity for self and custom build dwellings:</p> <ul style="list-style-type: none"> • land south of Lanacre, Chrishill Road, Fowlmere 	57469 (Colegrove Estates)
No comment.	57449 (Huntingdonshire DC)

H/BR: Build to rent homes

Hyperlink for all comments

Open this hyperlink - [Policy H/BR: Build to rent homes](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 18

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to build to rent homes. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There is support from site promoters and developers, and some Parish Councils, for the proposed approach to Build to Rent, given that it plays an important role in meeting housing needs, provides choice to residents and diversifies the housing market, and helps to create mixed and balanced communities. However, there are differing opinions on whether 20% affordable homes is the right approach, and strong objections from site promoters to any kind of restriction or limit on the amount of Build to Rent allowed within

a development. Some site promoters and developers have suggested that there needs to be more flexibility within the proposed approach, and that more research is needed on Build to Rent by the Councils to inform the Local Plan and North East Cambridge Area Action Plan. An individual is concerned that there are already too many Build to Rent developments.

Table of representations: H/BR - Build to rent homes

Summary of issues raised in comments	Comments highlighting this issue
Support	57750 (Bassingbourn-cum-Kneesworth PC)
Policy objective to create mixed and balanced communities is supported.	59514 (Pocket Living)
Supporting delivery of Build to Rent in appropriate locations is consistent with Housing Strategy, and failure to support Build to Rent will reduce overall delivery of good quality rental homes.	59514 (Pocket Living)
Good option that should be encouraged.	56778 (Croydon PC)
Supportive of Build to Rent being supported in the Local Plan as: <ul style="list-style-type: none"> • it can help contribute towards solving the housing shortage, • it can provide suitable accommodation in highly sustainable locations, • it plays an important role in meeting housing needs, 	57287 (Universities Superannuation Scheme – Commercial), 58234 (Countryside Properties (UK) Ltd), 58836 (Trumpington Meadows Land Company), 59274 (Brookgate), 58682 (Socius Development Limited on behalf of Railpen), 56709 (Watkin Jones Group PLC), 59533 (Countryside Properties – Bourn Airfield), 60597 (Countryside Properties – Fen Ditton site)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • it provides choice to residents and diversifies the housing market, • professional management services often used which can help maintain high quality of housing, • tenants tend to want longer tenancies which can help foster stronger sense of community, and / or • it can help increase delivery rates. 	
No comment.	57450 (Huntingdonshire DC)
Object, as policy should require 40% affordable rented homes.	58290 (Histon & Impington PC)
Generally support the proposed 20% affordable private rented dwellings requirement, however, policy should include an option to submit and agree viability assessments where schemes cannot sustain the full policy target.	58972 (Great Shelford (Ten Acres) Ltd)
Support requirement to provide 20% of homes as affordable private rent, however policy needs to be clear this assumes a 20% discount to market rent.	59515 (Pocket Living)
Do not support any potential restriction on the quantum of Build to Rent within a mixed tenure development. Need flexibility to be able to respond to change and particular	59274 (Brookgate), 56709 (Watkin Jones Group PLC)

Summary of issues raised in comments	Comments highlighting this issue
housing needs. Build to rent needs to be provided at a sufficient scale to be attractive to investors, be commercially viable, and be suitable in terms of management.	
Unjustified to include a limit on the proportion of Build to Rent within a development. No such restriction could be applied to other forms of private rented accommodation.	59533 (Countryside Properties – Bourn Airfield), 60597 (Countryside Properties – Fen Ditton site)
Proposals should seek to avoid large clusters of Build to Rent homes, but the policy should allow for appropriately sized clusters that assist with viability, delivery and management.	58234 (Countryside Properties (UK) Ltd)
Any proposed upper limit on proportion of Build to Rent homes needs to be properly evidenced and justified. An upper limit of 10% is unlikely to support the delivery of Build to Rent homes on developments across Greater Cambridge, which are seeking to provide Build to Rent as part of the overall housing offer.	58234 (Countryside Properties (UK) Ltd)
Should not set arbitrary restrictions on minimum or maximum proportion of homes which can be Build to Rent within individual schemes. Amount suitable should be determined having regard to a range of factors including local housing need, nature of the site, and surrounding housing provision.	59514 (Pocket Living)

Summary of issues raised in comments	Comments highlighting this issue
Policy requirement for the affordable homes to be distributed in a set way is unnecessary as affordable housing in Build to Rent schemes is provided/managed by the same operator as the market homes and therefore is tenure blind.	59517 (Pocket Living)
Developers seem to win out over renters.	59838 (Dry Drayton PC)
Accept that private rented sector has a role to play in meeting housing need, however, the sector is failing to provide secure, affordable and high standard homes. Reform is needed at a national level, but local policy should limit the damage.	60802 (Cambridge and South Cambridgeshire Green Parties)
Fundamental drawback is that affordability cannot be guaranteed, as it depends on wider market conditions.	60802 (Cambridge and South Cambridgeshire Green Parties)
Unclear how much of the policy is enforceable and how much is negotiable as too many references to 'should' rather than 'must'. For example, will all developments have to meet the standards set out in the Sustainable Design and Construction SPD?	60802 (Cambridge and South Cambridgeshire Green Parties)
Should be greater ambition in the provision of affordable housing. Recognise national benchmark is 20%, but given affordable housing crisis in Cambridge, should require a	60802 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
much greater proportion of affordable housing in these developments.	
Policy should include flexibility so that if 40% affordable is being provide across a mix of tenures that the Build to Rent element would not be expected to provide affordable housing above 40%.	58234 (Countryside Properties (UK) Ltd)
Variety of business models exist for the provision of Build to Rent and therefore flexibility is needed within the policy to reflect this.	59533 (Countryside Properties – Bourn Airfield), 60597 (Countryside Properties – Fen Ditton site)
More research is needed by the Councils to inform the Local Plan and North East Cambridge Area Action Plan and to recognise the contribution that Build to Rent can make in sustainable locations.	59274 (Brookgate)
PPG is clear that the onus is on LPAs to consider how Build to Rent can meet housing needs and create mixed and balanced communities. Concern that proposed policy seeks to direct this to the applicant.	59533 (Countryside Properties – Bourn Airfield), 60597 (Countryside Properties – Fen Ditton site)
There are too many Build to Rent developments already.	57587* (D Lott)
Specific developments promoted that provide opportunity for Build to Rent schemes in sustainable locations:	59274 (Brookgate), 58682 (Socius Development Limited on behalf of Railpen), 58234 (Countryside Properties (UK) Ltd),

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • North East Cambridge • Devonshire Gardens • Land west of Cambridge Road, Melbourn • Bourn Airfield New Village 	59533 (Countryside Properties – Bourn Airfield), 60597 (Countryside Properties – Fen Ditton site)

H/MO: Houses in multiple occupation (HMOs)

Hyperlink for all comments

Open this hyperlink - [Policy H/MO: Houses in multiple occupation \(HMOs\)](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 8

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to houses in multiple occupation. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

Despite the low number of responses there was no consensus. Those in support recognised the contribution HMOs make to the housing mix but also wanted the policy to include purpose built self-contained housing for single person households and to be tightened to improve the quality of HMO housing. However, some respondents were concerned that the development of HMOs has a negative effect on the character and social cohesion of neighbourhoods.

Table of representations: H/MO - Houses in multiple occupation (HMOs)

Summary of issues raised in comments	Comments highlighting this issue
<p>We support this policy</p> <ul style="list-style-type: none"> This is also an important part of the mixed housing 	<p>57751 (Bassingbourn-cum-Kneesworth PC), 56779 (Croydon PC)</p>
<p>This policy is supported but it should also provide support for the delivery of purpose-built self-contained housing for single person households.</p>	<p>59519 (Pocket Living)</p>
<p>HMO's can be beneficial but often offer sub-standard housing. Rather than carrying forward existing policy, it should be reviewed to inform a revised policy</p>	<p>60803 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>Continue controls on the conversion of homes into HMOs, particularly in the new developments in the Southern Fringe, where the changes required to make a home suitable (such as conversions and extensions) can have a negative effect on the urban design</p>	<p>56007 (Trumpington Residents Association)</p>
<p>The current policy of allowing larger properties to be converted to HMO's has had a significant impact on the residential area of South Petersfield through the loss of community cohesion and the ability of larger families to find suitable housing</p>	<p>59270 (F Gawthrop)</p>

Summary of issues raised in comments	Comments highlighting this issue
Need policies to protect existing neighbourhoods from the incremental impact of inappropriate conversions/creation of HMOs	58014 (Cambridge Doughnut Economics Action Group)
Do not support this policy.	57587* (D Lott)
No comment	57451 (Huntingdonshire DC)

H/SA: Student Accommodation

Hyperlink for all comments

Open this hyperlink - [Policy H/SA: Student accommodation](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 13

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to student accommodation. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There was general support for the proposed student accommodation policy approach subject to a review of the overall student accommodation need. Croydon PC raised concern about this need detracting from permanent local housing. One member of the public commented that there were already too many students. Histon & Impington PC objected to student accommodation not providing visitor parking.

In terms of location, site promoters requested the city centre be treated as an appropriate location for new student accommodation. On this matter, Linton PC supported the conversion of unused commercial buildings to student accommodation as a means of sustaining the city centre. One property developer suggested student accommodation directly adjacent to existing/proposed educational establishments should be supported.

The University of Cambridge raise concern about the intention for self-contained accommodation to be counted towards delivering the overall housing requirement for Greater Cambridge, and highlight that this approach should not be to the detriment of meeting other housing needs. Similarly, the Home Builders Federation highlighted the need for local evidence to ensure the dwelling equivalency rate used for student accommodation avoids overestimating the supply of homes returning to the open market.

Only ARU raised concern with the policy approach which it considered unduly restrictive in that individual sites are effectively required to remain in their current general residential or student use despite both contributing towards delivering the overall housing requirement. It suggested more policy flexibility in relation to individual sites.

Table of representations: H/SA - Student accommodation

Summary of issues raised in comments	Comments highlighting this issue
Policy supported	57288 (Universities Superannuation Scheme -Commercial), 57752 (Bassingbourn-cum-Kneesworth PC)
The numbers for this need to be reviewed, so that it does not detract from permanent local housing.	56780 (Croydon PC)

Summary of issues raised in comments	Comments highlighting this issue
Policy supported. The proposed policy should recognise the city centre is an appropriate location for new student accommodation.	57242 (Abrdn), 58226 (Universities Superannuation Scheme - Retail)
No comment	57452 (Huntingdonshire DC)
Student accommodation should be an excuse to not provide Parking. Vehicle parking will still be required. How else will they have visitors?	58291 (Histon & Impington PC)
Policy is unduly restrictive in that individual sites are effectively required to remain in their current general residential or student use whilst either/both contribute towards delivering the overall housing requirement. More flexibility in relation to individual sites should be included.	58448 (ARU)
Unused commercial buildings could be converted to these - would also sustain the city centre.	58475 (Linton PC)
Policy supported. The policy could also support student accommodation directly adjacent to existing/ proposed educational establishments. This will in turn achieve the currently adopted policy's (46) aims of locating such accommodation in areas served by sustainable transport	59101 (Metro Property Unit Trust)

Summary of issues raised in comments	Comments highlighting this issue
modes and reducing pressure on the existing private residential housing stock.	
The intention for self-contained accommodation to count towards delivering the overall housing requirement for Greater Cambridge should not be at the expense of meeting other housing needs.	59209 (University of Cambridge)
Dwelling equivalent for student accommodation: local evidence is needed to ensure equivalency rate for student housing avoids overestimating the supply of homes returning to the open market.	60184 (Home Builders Federation)
Policy supported. Need to await 2022 findings from Universities on demand for student accommodation.	60804 (Cambridge and South Cambridgeshire Green Parties)
Already plenty of student accommodation.	57587* (D Lott)

H/DC: Dwellings in the countryside

Hyperlink for all comments

Open this hyperlink - [Policy H/DC: Dwellings in the countryside](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 14

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There is support for the principle of the dwellings in the countryside policy from some Parish Councils and the Cambridge and South Cambridgeshire Green Parties. Additionally, Pembroke College state the policy would provide flexibility for development in countryside whilst ensuring the setting is not adversely affected. Cambridge Past, Present & Future suggest a need for clarification in the supporting text on the meaning of replacement dwelling in the green belt not being 'materially larger', and Parish Councils suggest dwelling density in the countryside should differ from that in towns and cities, and prioritising agricultural, low paid, essential and rural workers.

KWA Architects object to the policy, requiring wording changes to extensions in the Green Belt taking account of the permitted development precedent, occupancy of rural workers dwellings allowing family-living rights, and a three-year limit on temporary dwellings for new rural businesses.

Historic England has concerns over reuse of buildings in the countryside highlighting that any proposals need to consider the historic environment and that heritage assets may form part of the local heritage of an area. Whilst Steeple Morden PC stress the importance of ensuring structures are sound. Croydon PC comment that dwellings should remain contiguous with villages, and Gamlingay PC state that stand-alone annexes should be refused permission to limit number and sprawl into open countryside.

Table of representations: H/DC - Dwellings in the countryside

Summary of issues raised in comments	Comments highlighting this issue
Annex Accommodation: Refuse permission for stand-alone annex accommodation in the countryside. Connect to main dwelling house, preventing additional units in the open countryside. Current plan does not limit or control sprawl of associated buildings into open countryside.	56656 (Gamlingay PC)
Should remain contiguous with villages	56781 (Croydon PC)
Object to Policy <ul style="list-style-type: none"> • Policy wording changes required to extensions in the Green Belt to take account of the permitted development precedent 	57049 (KWA Architects)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • the occupancy of a rural worker's dwelling to allow for family-living rights • Implementation timing of three year limit on temporary dwellings for new rural businesses 	
No comment	57453 (Huntingdonshire DC)
Support/Broadly Support Policy	57753 (Bassingbourn-cum-Kneesworth PC), 60098 (Guilden Morden PC), 60805 (Cambridge and South Cambridgeshire Green Parties)
Policy provides flexibility for development in countryside and ensures setting not adversely affected.	58270 (Pembroke College)
Dwelling density in countryside should differ from density in towns and cities.	58292 (Histon & Impington PC)
Need priority for agricultural, low paid, essential and rural workers, not commuters.	58478 (Linton PC)
Supporting text needs clarity on meaning of replacement dwelling in the green belt not being 'materially larger'.	58944 (Cambridge Past, Present & Future)
The reuse of buildings in the countryside, needs to consider the historic environment. Heritage assets, designated or non-designated, may form part of the local heritage of an area.	59685 (Historic England)

Summary of issues raised in comments	Comments highlighting this issue
Support, stress the importance that ensure structures are sound.	60022 (Steeple Morden PC)
Policy needs careful consideration.	60432 (Great and Little Chishill PC)

H/RM: Residential moorings

Hyperlink for all comments

Open this hyperlink - [Policy H/RM: Residential moorings](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 2

Note

- The representation summaries for Policy H/RM: Residential moorings were reported to JLPAG as part of Strategy and Sites alongside the comments on the overall housing need made to S/JH: New jobs and homes. The representation summaries are included again here as there are comments relating to the proposed approach to the policy, as well as relating to the overall housing need.

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There was support for addressing provision from Huntingdonshire DC. The Cambridge and South Cambridgeshire Green Parties highlight the need for engagement, and for provision of appropriate facilities.

Table of representations: H/RM – Residential moorings

Summary of issues raised in comments	Comments highlighting this issue
Support for extending the policy to the small proportion of River Great Ouse where the banks lie within South Cambridgeshire.	57454 (Huntingdonshire DC)
Important to review successes and failures of existing policy to inform any necessary updates. Need to learn from previous consultations where proposals were met with fierce opposition.	60806 (Cambridge and South Cambridgeshire Green Parties)
<p>There are issues with existing provision that should be considered:</p> <ul style="list-style-type: none"> • new moorings should have appropriate pump out facilities, • pontoons should be designed with a narrowboat in mind to ensure boats will fit, and • fixtures for moorings need to be designed with caution, and reflecting need for boats to be able to move as water levels change. 	60806 (Cambridge and South Cambridgeshire Green Parties)

H/RC: Residential caravan sites

Hyperlink for all comments

Open this hyperlink - [Policy H/RC: Residential caravan sites](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 6

Notes

- The representation summaries for H/RC: Residential caravan sites were reported to JLPAG as part of Strategy and Sites alongside the comments on the overall housing need made to S/JH: New jobs and homes. The representation summaries are included again here as there are comments relating to the proposed approach to the policy, as well as relating to the overall housing need.
- Some representations included in the summary of representations table have been moved from the homes headings as the comments were specific to residential caravan sites. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

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Executive Summary

The Cambridge GRT Solidarity Network and Cambridge and South Cambridgeshire Green Parties raise concerns regarding sufficient provision of sites and the effective assessment of need. The Environment Agency highlight the importance of addressing flood risk.

Table of representations: H/RC – Residential caravan sites

Summary of issues raised in comments	Comments highlighting this issue
Need to review the vulnerability of tenure which may be an issue.	56782 (Croydon PC)
No comment.	57455 (Huntingdonshire DC)
Needs to distinguish between mobile home parks and caravans on farms used for seasonal workers.	57754 (Bassingbourn-cum-Kneesworth PC)
Annex C (Flood Vulnerability Classification) of the NPPF classifies caravans, mobile homes and park homes intended for residential use as highly vulnerable as if located adjacent to rivers they are at significant risk from being quickly inundated without sufficient warning or means of escape. Therefore: <ul style="list-style-type: none">• flood risk should be a key consideration in the policy criteria, and	59730 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • sequential test needs to be applied when considering sites. 	
<p>Deep concern for the policy, particularly given Police, Crime Sentencing and Courts Bill which targets Gypsy and Traveller communities and effectively criminalises their way of life. This policy needs to safeguard these groups and provide sufficient pitches/plots to meet their needs.</p>	60246 (Cambridge GRT Solidarity Network)
<p>Essential that this policy is based on good evidence and on genuine consultation with the communities affected.</p> <p>Concerned that the Accommodation Needs Assessment will have been unable to establish much contact with the communities affected. Local Plan should prioritise the delivery of sites for Gypsy, Roma and Traveller communities and ensure that they meet their needs, are sufficiently spacious and affordable, and are in locations that are desirable to this community.</p>	60807 (Cambridge and South Cambridgeshire Green Parties)
<p>Should not be located in the City, but could possibly be small developments located elsewhere.</p>	57587* (D Lott)

H/GT: Gypsy and Traveller and Travelling Showpeople sites

Hyperlink for all comments

Open this hyperlink - [Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 11

Notes

- The representation summaries for H/GT: Gypsy and traveller and travelling showpeople sites were reported to JLPAG as part of Strategy and Sites alongside the comments on the overall housing need made to S/JH: New jobs and homes. The representation summaries are included again here as there are comments relating to the proposed approach to the policy, as well as relating to the overall housing need.
- Some representations included in the summary of representations table have been moved from the homes headings as the comments were specific to gypsy and traveller and travelling showpeople sites. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

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Executive Summary

A number of organisations highlight the importance of provision of sites, and ensuring those sites are suitable, such as having access to facilities, and appropriate foul drainage. Best practice examples are highlighted. One developer expresses concerns regarding the provision of sites as part of major developments.

Table of representations: H/GT: Gypsy and Traveller and Travelling Showpeople sites

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for policy</p> <ul style="list-style-type: none">• Additional suitable sites should be provided, and unauthorised sites subject to the same planning as housing and residential caravan sites• There is a need for a traveller site to support members of the travellers community who need good access to the hospitals on CBC• Provision for permanent and transit sites must be addressed, with a process to provide sites including on the edge of Major Developments• A diverse range of locations should be provided to ensure they offer choice and respond to the preferences of future residents	<p>57755 (Bassingbourn-cum-Kneesworth PC) 56783 (Croydon PC), 56999 (Trumpington Residents Association), 58287 (H Smith), 57456 (Huntingdonshire DC)</p>

Summary of issues raised in comments	Comments highlighting this issue
The principle of inappropriate in the Green Belt must be enforced for all	58296 (Histon & Impington PC)
<p>Opposed to proposed policy. Gypsy and Traveller Accommodation is best provided through standalone Gypsy and Traveller site allocations or through windfall allocations. If there is a requirement for this accommodation to be provided as part of larger developments, this should only relate to the larger developments for new settlements and such requirements should be set out in the allocation policy for that site</p>	57399 (Persimmon Homes East Midlands)
The current policies are not working and have delivered too few sites. Failings will be exacerbated by the Police, Crime Sentencing and Courts Bill	58573 (Cambridge GRT Solidarity Network), 60808 (Cambridge and South Cambridgeshire Green Parties)
<p>Should be following best practice as set out in the London Gypsies and Travellers 'Best Practice for assessing the accommodation needs of Gypsies and Travellers'</p> <ul style="list-style-type: none"> • This applies to consultation and needs assessment methodologies • Recent needs assessments have under-stated needs 	58573 (Cambridge GRT Solidarity Network), 60808 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
Need to allocate better quality sites	58573 (Cambridge GRT Solidarity Network), 60808 (Cambridge and South Cambridgeshire Green Parties)
The nature of G&T sites means they should be treated as highly vulnerable and flood risk should be a key consideration in any policy criteria	59731 (Environment Agency)
The existing site at Fen Road continues to be a source of ongoing local water quality and environmental health problems due to inadequate foul drainage provision. Policy H/GT should include provision for mains foul drainage and protection of water quality as part of the policy criteria	59731 (Environment Agency)
If further need, then area on Fen Road could be developed to accommodate them.	57587* (D Lott)

H/CH: Community-led housing

Hyperlink for all comments

Open this hyperlink - [Policy H/CH: Community-led housing](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 8

Note

- Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to community led housing. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There were few comments on this policy but they were broadly supportive. It was argued that community-led housing should be seen as part of a broader package of affordable housing options but there were differing views on how community-led housing should relate to rural exception sites. There was a suggestion that the policy could adopt the approach to self/custom build whereby 5% of dwellings on larger sites should be set aside for community-led housing.

Table of representations: H/CH - Community-led housing

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for policy</p> <ul style="list-style-type: none"> • community-led housing delivers benefits beyond the reach of market housing • need a SPD to support delivery • should be preferred form of delivery for rural exception sites • support as long as does not conflict with exception site policy • support as part of broader package of affordable housing options 	<p>56955 (J Mielnik), 57756 (Bassingbourn-cum-Kneesworth PC), 59806 (Histon & Impington Community Land Trust), 60023 (Steeple Morden PC), 60099 (Guilden Morden PC), 60809 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>This policy could be strengthened by mirroring the self/custom build policy which requires 5% of houses on schemes of 20+ dwellings to be self/custom built</p>	<p>56819 (F Wright),</p>
<p>Must be clear which policies in the Local Plan will apply to community led housing developments</p>	<p>60809 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>Do not support this policy.</p>	<p>57587* (D Lott)</p>
<p>No comment</p>	<p>57457 (Huntingdonshire DC)</p>

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Appendix B: Summaries of Representations – Wellbeing and social inclusion Chapter

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Wellbeing and social inclusion

Hyperlink for all comments

Open this hyperlink - [Wellbeing and social inclusion](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section

42

Notes

- Whilst the webpage linked above effectively included only general comments on the Wellbeing and Social Inclusion policies, some comments attached to this webpage relate to specific housing and open space policies. These comments have been moved to the specific policy: H/AH Affordable Housing, H/HM Housing mix and BG/EO Providing and enhancing open spaces.
- Some comments attached to this section relate to transport, water efficiency, urban and specific sites. In many cases the representors that made these comments have also made similar comments on the relevant sections within the plan. Where appropriate we will review placement of these comments in the final version of these representation summaries which will accompany the draft plan.

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There was good general support for the overarching aims of the proposed wellbeing and inclusion policies from site promoters, the University of Cambridge, the Cambridgeshire and Peterborough Clinical Commissioning Group, Cambourne TC and Central Bedfordshire Council. Huntingdonshire District Council had no comment on this policy area. Two site promoters expressed the need for a more balanced provision of affordable housing and sustainable travel across Greater Cambridge, in order to achieve the Local Plan's identified wellbeing and social inclusion aspirations. Fen Ditton PC was broadly supportive of aspiration but concerned with the ambiguity in some of the detail.

One member of the public expressed a need for new residential development to be no more than 4 storeys high, inclusive and provide open spaces with a balanced approach to cycling. Existing sporting facilities must be maintained and improved to safe, modern requirements. One member of the public suggested the Local Plan should include policies to protect cultural significance, specifically to support cultural activities and to provide for, and safeguard public and private spaces for arts and other activities.

In terms of social & transport infrastructure provision, comments from two members of the public and three PCs: Bassingbourn-cum-Kneesworth, Great Shelford; and Teversham were received. They cited concerns over the need: to consider the impact of high growth strategy on existing residents; for access to GPs and other primary care services and the retention of those services in villages; for active travel to be a feasible choice; and to invest in sports and leisure facilities, swimming pools, across the city and especially near large new developments. There was little evidence of detailed plans regarding infrastructure to support well-being and inclusion, communities need green community spaces, public parks, policing, schools, shops. They noted transport to any services and social support are essential to achieving wellbeing along with lower housing densities, increased dwelling space standards and access to private amenity space. Histon & Impington PC stated water efficiency must be compulsory.

DB Group Holdings raised the matter of the Local Plan ensuring a variety of employment opportunities are available across the District for all members of the community. Cambridge Past, Present & Future noted the protection and enhancement of the Historic

Environment is not just key to creating and providing Great Places but also a vital part of Wellbeing.

One member of the public cited the North East Cambridge proposal, with the relocation of Cambridge Waste Water Treatment Plant (CWWTP).will have a negative impact on residents and users of the surrounding area. Another member of the public suggested policies should acknowledge both the health and amenity benefits of visible green open space even if not publicly accessible. A different member of the public noted the need to balance climate change mitigation and adaptations with provision of a good standard of amenity. There was also no mention of people with disabilities. Linton PC highlighted the need to consider needs of elderly people.

The Environment Agency, while supportive of the opportunity to level-up communities, tackling this green inequality at scale and improving the health and wellbeing of those living and working in the GC area, caveated that for this to be achieved this needs to be balanced with the need to protect the environment, by providing appropriate wildlife refuges from human disruption and interference.

The Cambridge and South Cambridgeshire Green Parties considered the Local Plan will only worsen environmental damage and fail to serve Cambridge citizens who are disadvantaged, and the planned growth will only serve our significantly privileged citizens.

Many comments were submitted by site promoters indicating that their sites, if allocated for development would support the Local Plan's aspiration for creating healthy developments. Stapleford PC advised against 100-dwelling add-on developments rather the provision of infill brownfield sites with affordable housing would support inclusivity and develop wellbeing.

Several groups and individual members of the public highlighted the negative impact the relocation of CWWTP to Honey Hill would have on local amenity in terms of noise, odour and vibration pollution.

Table of Representations: Wellbeing and social inclusion

Summary of issues raised in comments	Comments highlighting this issue
Support for the overarching aims of the proposed wellbeing and inclusion policies.	57207 (Abrdn), 57272 (Universities Superannuation Scheme - Commercial), 58207 (Universities Superannuation Scheme - Retail), 58526 (Marshall Group Properties), 58643 (University of Cambridge) & 58315 (Hallam Land Management Limited), 58782 (Trumpington Meadows Land Company) (59174) Cambridgeshire and Peterborough Clinical Commissioning Group (CCG), (59222) Cambourne Town Council, 59697 (Central Bedfordshire Council)
If the Plan is going to meet the wellbeing and social inclusion aspirations identified, then there needs to be a better balance to ensure that affordable housing and sustainable travel is provided across the urban and rural areas of Greater Cambridge, not just Cambridge, the edge of Cambridge and new settlements.	57176 (Southern & Regional Developments Ltd) 57250 (European Property Ventures - Cambridgeshire)
Need to ensure new residential development is no more than 4 storeys high, inclusive and provide open spaces	57276 (D Lott)
Need balanced approach towards cycling	57276 (D Lott)
No Comment	57406 (Huntingdonshire District Council)

Summary of issues raised in comments	Comments highlighting this issue
Existing many sporting facilities must be maintained/improved to safe/modern requirements.	57276 (D Lott)
<p>Social & Transport Infrastructure Provision:</p> <ul style="list-style-type: none"> - Impact of high growth strategy on existing residents needs to be evaluated including water - Policy should address the need for access to GPs and other primary care services and the retention of those services in villages - Active travel should be a feasible choice. - Need to invest in sports and leisure facilities, swimming pools, across the city and especially near large new developments. - little evidence of detailed plans regarding infrastructure to support well-being and inclusion, communities need green community spaces, public parks, policing, schools, shops. - Transport to any services and social support is a huge part of wellbeing. 	57537 (C Martin); (Bassingbourn-cum-Kneesworth PC); (D Lister); 59127 (Great Shelford PC); 59232 (Teversham PC)

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> - Lower housing density, increased dwelling space standards and access to private amenity space are also essential to achieving wellbeing. 	
Fulfilment of S/NEC Policy through relocation of CWWTP will have a negative impact on residents and users of the surrounding area.	57680 (J Conroy)
Water efficiency must be compulsory.	57874 (Histon & Impington PC)
Policies should acknowledge specifically the health benefits and amenity benefits of visible green open space such as college or other playing fields even if not publicly accessible	57962 (E Davies)
The Local Plan should ensure that a variety of employment opportunities are available across the District for all members of the community. This includes protecting and enabling the growth of established and successful businesses in the District such as DB Group (Holdings) LTD	58277 (DB Group Holdings LTD)
Need to consider needs of elderly people.	58435 (Linton PC)
Protecting and enhancing the Historic Environment is not only key to creating and providing Great Places but a vital part of Wellbeing.	58784 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
The GC Local Plan presents an opportunity to level-up communities, tackling this green inequality at scale and improving the health and wellbeing of those living and working in the GC area, by creating and contributing to healthier, greener, and more accessible environments. This must, however, be achieved in balance with the need to protect the environment, by providing appropriate wildlife refuges from human disruption and interference.	59728 (Environment Agency)
Need to balance the climate change mitigation/adaptations with providing a good standard of amenity. No mention of disabled people.	59779 (B Hunt)
Broadly supportive of aspiration but concerned at ambiguity in some of the detail.	59925 (Fen Ditton PC)
The Local Plan should include policies to protect cultural significance, and specifically to support cultural activities, and to provide for, and safeguard, public and private spaces for arts and other activities.	60201 (J Preston)
Support protection of valuable open spaces although planned development in the north part of the city threatens these spaces.	60772 (Cambridge and South Cambridgeshire Green Parties)

Summary of issues raised in comments	Comments highlighting this issue
<p>Local Plan's will only worsen environmental damage and fail to serve Cambridge citizens who are disadvantaged and the planned growth will only serve our significantly privileged citizens.</p> <p>A good standard of living, affording to get onto the property ladder, is not accessible to many local residents who grow up here and additionally deterring those living in other places from coming to live here.</p>	

Table of representations: Wellbeing and social inclusion (sites)

Summary of site related issues raised in comments	Comments highlighting this issue
<p>The land at Fen Ditton site would include the aspiration for creating a healthy new development, providing the opportunity to create a healthy community with infrastructure supporting community activity, health, education and quality of life. Achieved through a combination of a compact mixed-use urban structure and providing integrated green space which creates the conditions for people to lead healthy lives by encouraging 'active travel',</p>	<p>60575 (Countryside Properties - Fen Ditton site)</p>

Summary of site related issues raised in comments	Comments highlighting this issue
reducing vehicular traffic, improving the public realm and enhancing social interaction. Include 'equigenesis': an equalising environment that uplifts everyone's health and well-being.	
The provision of new sports pitches and a village hall /sports pavilion on Land at Fulbourn Road, Teversham will wholly support the ambitions of Policy WS/HD: Creating healthy new developments and Policy WS/CF: Community, sports and leisure facilities.	56900 (RWS Ltd)
The redevelopment of the Clifton Road Industrial Estate will have opportunities to improve the wellbeing and inclusion of local residents.	57272 (Universities Superannuation Scheme -Commercial)
Avoid 100-dwelling add-on developments; provide infill brownfield sites with affordable housing which support inclusive and develop wellbeing.	57530 (Stapleford PC)
The creation of truly mixed-use communities, maximising access to jobs and facilities for all residents, as proposed at North Cambourne, is a key measure in assessing which sites should come forward for development.	57908 (Martin Grant Homes)

Summary of site related issues raised in comments	Comments highlighting this issue
<p>Larger sites are preferred in achieving overall gains for inclusion and balanced place making, as they can better provide: homes for all parts of the community; a wider range of accessible jobs; support the delivery of low carbon transport infrastructure; ensure that infrastructure, services and facilities are provided alongside new employment and homes; and support arts and culture.</p>	
<p>IWM is supportive of aims for supporting wellbeing and inclusion and can make a significant contribution to local health and wellbeing, including placemaking and identity, community engagement and social inclusion.</p>	58018 (Imperial War Museum/Gonville and Caius College)
<p>Cambridge East has the scale to achieve transformational change in the east of the City that will significantly improve the lives of local residents through the provision of job opportunities, affordable homes and a range of cultural, leisure and retail options.</p>	58526 (Marshall Group Properties)
<p>Land at Meldreth provides an opportunity to provide for sustainable growth in the southern part of the rural area where there are not necessarily other suitable locations.</p>	58933 (Phase 2 Planning)

Summary of site related issues raised in comments	Comments highlighting this issue
<p>Comprehensively planned development at Cambridge South would bring opportunities for local living, particularly for those in housing need and those working at the Biomedical Campus for whom housing is unaffordable or inaccessible. A fully integrated community is proposed with supporting recreation, health and social infrastructure – with tangible benefits for health and wellbeing.</p>	<p>59000 Jesus College (working with Pigeon Investment Management and Lands Improvement Holdings), a private landowner and St John's College</p>
<p>The proposals at Whittlesford would help to build a healthy and sustainable community.</p>	<p>59119 (Grosvenor Britain & Ireland)</p>
<p>The scale of development at Cambridge East provides a significant opportunity to meet, not only the needs of the future Cambridge East residents, but also a wider demand for community, sports and leisure facilities close to the city centre that might not be capable of being accommodated on other more constrained sites.</p>	<p>58535 (Marshall Group Properties)</p>
<p>If the site at Comberton were to be allocated this would provide a key opportunity to provide much needed specialist housing for older people in a sustainable location which would benefit the wider community. The characteristics of Extra Care development (such as the provision of on-site services</p>	<p>59773 (Endurance Estates)</p>

Summary of site related issues raised in comments	Comments highlighting this issue
and facilities) should enable consideration of where this can contribute towards mixed and balanced communities and sustainable growth in rural areas.	
Support the development of new facilities in appropriate locations where there is local need. At CBC there is an identified need for the social infrastructure, community and leisure facilities that can help a community thrive, and which foster great placemaking. Social infrastructure and community uses will provide a key part of the supportive environment for clusters and innovation districts, and different users onsite.	58843 (CBC Limited, Cambridgeshire County Council and a private family trust),
The fulfilment of S/NEC policy through the relocation of CWWTP to Honey Hill is contrary to this policy and would lead to adverse effects in terms of noise, odour and vibration pollution and contravenes WS/HS: Pollution, health and safety.	56512 (Catherine Martin), 57578 (Save Honey Hill Group), 57627 (J Pratt), 57681 (Jennifer Conroy)

WS/HD: Creating healthy new developments

Hyperlink for all comments

Open this hyperlink - [Policy WS/HD: Creating healthy new developments](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section

43

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

General support for the approach towards the WS/HD Creating healthy new developments policy. Those indicating their support included Cambridgeshire and Peterborough Clinical Commissioning Groups, Cambourne TC, Great and Little Chishill PC, Cambridge and South Cambridgeshire Green Parties, two members of the public and three developers; one of which suggested the policy should go further with other measures which maximise wellbeing benefits. There were also many comments from individuals and site promoters stating the application of Health Impact Assessments should only relate to major developments with one site promoter requesting the threshold being outlined.

Cambridge Cycling Campaign cited the need for new developments to integrate transport and cycling infrastructure which supports all types of uses and users. One member of the public noted adequate allotment provision will contribute to healthy developments. Natural England suggested the policy include links to the importance of adequate levels and qualities of accessible green

infrastructure. One developer and another site promoter, while supportive of the application of health principles to new development, stated the ten Healthy New Towns principles were onerous and development should apply these where possible.

Cambridge and South Cambridgeshire Green Parties supported the idea of “high quality people-focused spaces” but requested more details on these. They suggested the Local Plan should support interventions like those set out in the ‘Encouraging Healthier Takeaways in Low Income Communities’. They would also like to see council involvement to see local businesses who already produce healthy food for the residents of Cambridge having a presence in local shops in Chesterton, Arbury, Abbey and Kings Hedges. The Council should approach these local businesses and provide incentives for them to trade in areas where all local people can access them; not just those who live in Market or Petersfield or Trumpington.

Table of Representations: Policy WS/HD - Creating healthy new developments

Summary of issues raised in comments	Comments highlighting this issue
Support for the overarching aims of the proposed creating healthy new developments policy	58837 (CBC Limited), 59179 (Cambridgeshire and Peterborough CCG), 59224 (Cambourne TC), 59773 (Endurance Estates), 59780 (B Hunt), 60133 (Christopher Blakeley), 60153 (U&I PLC and TOWN), 60422 (Great and Little Chishill PC), 60224 & 60553 (Thakeham Homes Ltd), 60774 (Cambridge and South Cambridgeshire Green Parties)
Policies could go further to set out requirements on not only creating healthy new developments, but other measures which maximise wellbeing benefits that developments can offer those who build them, those who live in them and the communities around them now and into the future.	60224 & 60553 (Thakeham Homes Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Health Impact Assessments: The requirement should only relate to major developments.	57098 (C King), 57298 (C Sawyer Nutt), 58868 (Abbey Properties Cambridgeshire Ltd), 59158 (Endurance Estates), 60289 (Wheatley Group Developments Ltd), 60340 & 60351 (F.C. Butler Trust), 60360 (H.J. Molton Settlement), 60379 (S & J Graves), 60389 (D Wright), 60469 (P,J&M Crow)
Need to outline threshold where a Health Impact Assessment is required.	59015 (Metro Property Unit Trust)
New developments must integrate transport and cycling infrastructure which supports all types of uses and users.	59025 (Cambridge Cycling Campaign)
Adequate allotment provision will contribute to healthy developments.	59293 (D Fox)
The policy should include strong links to the importance of adequate level and quality of accessible green infrastructure	59980 (Natural England)
Supportive of application of health principles to new development, however the ten Healthy New Towns principles are onerous. Rather, development should apply these where possible. Clarification on when Health Impact Assessments are needed and not needed.	60521 (Taylor Wimpey UK Ltd), 60575 (Countryside Properties - Fen Ditton site)

Summary of issues raised in comments	Comments highlighting this issue
Support the idea of “high quality people-focused spaces” but want more detail on these.	60774 (Cambridge and South Cambridgeshire Green Parties)
Policy which restricts the development and locations of hot food takeaways seems sound. How can we encourage and enable local families to eat a balanced and sufficient diet? The Local Plan should support interventions that help to reverse this trend like those set out in the ‘Encouraging Healthier Takeaways in Low Income Communities’	60774 (Cambridge and South Cambridgeshire Green Parties)
Want council involvement to see local businesses who already produce healthy food for the residents of Cambridge having a presence in local shops in Chesterton, Arbury, Abbey and Kings Hedges. The Council should approach these local businesses and provide incentives for them to trade in areas where all local people can access them; not just those who live in Market or Petersfield or Trumpington.	60774 (Cambridge and South Cambridgeshire Green Parties)

WS/CF: Community, sports and leisure facilities

Hyperlink for all comments

Open this hyperlink - [Policy WS/CF: Community, sports and leisure facilities](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section

32

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council RA = Residents' Association

Executive Summary

General support for the approach towards the Policy WS/CF Community, sports and leisure facilities policy. Those indicating their support included Bassingbourn-cum-Kneesworth PC, Steeple Morden PC, Guilden Morden PC, Great and Little Chishill PC and Marshall Group Properties.

Cambourne TC supported the policy but stated it should not rely on community hubs providing facilities as they do not meet all the diverse age and cultural needs. Croydon PC and Trumpington RA, while both supportive of the policy, noted the need for transport for outlying villages to access facilities and for long-term support for community, sports and leisure facilities beyond the early stages

in a development, respectively. Huntingdonshire District Council had no comment on this policy area. Barrington PC requested a much stronger policy definition for Community Healthcare facilities which should be prioritised given their poor provision under the current Plan.

One member of the public requested the prioritisation of a new swimming pool for public access in Cambridge and South Cambridgeshire, especially in the latter due to lack of provision and new development, and existing capacity especially in Cambridge being over capacity. This should not just consider future demand but existing demand especially from students and South Cambridgeshire population into Cambridge. Histon and Impington PC stated the need to aim for a swimming pool within cycling distance of every community. Subscription based sports facilities should be discouraged to enable their use by all. Sport England requested their 'Active Design' be referenced in the policy for the development of new facilities that encourage people to take part in sport and physical activity. The Cambridge Futsal Club, with the support of Cambridge Handball Club indicated the lack of a venue in the whole of Cambridgeshire large enough to host national level indoor sports events watched by seated spectators. One member of the public highlighted that Cambridge skateparks are not suitable for year-round use; to be suitable in winter these require lighting and rain covers. One developer cited the lack of evidence on existing levels of open space and whether these are sufficient.

Two site promoters noted the need for the policy to set out how new community, sports and leisure facilities will be provided and sustained through new development. The type and scale of facilities should be commensurate to the size of the development proposed. One member of the public requested further information about preventing landlords from evicting Clubs operating on their land or charging a rent so high the Club is forced to leave. Two site promoters supported the policy but requested further clarification about what is deemed 'appropriate' and thresholds for contributions and whether these are provided on/off-site. Two city centre site promoters confirmed the proposed policy clearly stated community, sports and leisure facilities are appropriate in mixed-

use developments, such as Lion Yard, Grand Arcade & Guildhall Chambers. They noted these are vital to ensuring continued vitality in this type of development.

Cambridgeshire County Council (Education) raised associated safeguarding concerns where facilities are used by the school and the wider community. Separate access arrangements are needed and expected to be fully funded by the developer to mitigate the level of risk. Early engagement is needed to mutually agree the basis on which access to the facilities will be managed. One developer supported the policy but went on to state the capacity of existing facilities and capacity offered by educational establishments needs consideration to ensure that provision is not sought, where capacity exists elsewhere.

The Education and Skills Funding Agency (Department for Education) requested the policy makes clear that education facilities serving a wider catchment area will not be considered a town centre use requiring sequential approach to be applied, but that any such facilities must be in sustainable, accessible locations.

Cambridgeshire and Peterborough Clinical Commissioning Group requested planning policies actively support the strategic plans of local health commissioners, and new health facilities to meet the needs of the population should be supported. These should enable flexibility within the NHS estate. Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation programmes, it should be accepted that a facility is neither needed nor viable for its current use and planning policies within the Local Plan must support the principle of alternative uses for NHS land and property.

The Cambridge and South Cambridgeshire Green Parties highlighted the social impact of access to a good standard of education. Growing inaccessibility to social care and services mean many families miss out on help, entrenching patterns of inequality throughout lives. A space to study at home and parents who provide books making a bigger difference than school attendance. They requested better accessibility to community, sports and leisure facilities, and recreational green open spaces. They also

objected to the built open space alongside the Meadows Community Centre in Arbury and would like to see existing open spaces in Arbury turned into spaces for recreational use.

Table of Representations: WS/CF- Community, sports and leisure facilities

Summary of issues raised in comments	Comments highlighting this issue
Support for the overarching aims of the proposed Community, sports and leisure facilities policy.	57715 & 57716 (Bassingbourn-cum-Kneesworth PC), 58535 (Marshall Group Properties), 60009 (Steeple Morden PC), 60087 (Guilden Morden PC), 60423 (Great and Little Chishill PC)
Prioritise the build of new swimming pool for public access in Cambridge and South Cambridgeshire, especially in the latter due to lack of provision and new development, and existing capacity especially in Cambridge being over capacity. More appropriate provision will also reduce traffic in Newmarket Road and East Road, two existing choke points. Build should be looked at not just on future demand but existing demand especially from students and South Cambridgeshire population into Cambridge.	56507 & 58812 (M Tansini)
Need to aim for a swimming pool within cycling distance of every community.	57866 (Histon and Impington PC)

Summary of issues raised in comments	Comments highlighting this issue
Subscription based sports facilities should be discouraged to enable their use by all. This will then include the society at large.	57880 (Histon & Impington PC)
Support policy however transport is also needed for outlying villages to access facilities	56748 (Croydon PC)
There is no venue in the whole of Cambridgeshire large enough to host national level indoor sports events watched by seated spectators.	56787 (C Horton, Chairman of Cambridge Futsal Club & with the support of Cambridge Handball Club)
Sport England would like to see their 'Active Design' referenced in the policy for the development of new facilities that encourage people to take part in sport and physical activity.	56856 (Sport England)
Where facilities are used by the school and the wider community, there are associated safeguarding concerns. Separate access arrangements are needed and expected to be fully funded by the developer to mitigate the level of risk. Early engagement is needed to mutually agree the basis on which access to the facilities will be managed.	56950 (Cambridgeshire County Council - Education)
Supports for the policy however there is a need to provide long-term support for community, sports and leisure facilities,	56982 (Trumpington RA)

Summary of issues raised in comments	Comments highlighting this issue
<p>continuing beyond the early stages in a development. Based on our experience in the Southern Fringe, it would have been very beneficial to have greater support for the community development process over a longer period than has been possible through the s106 funding and Council budget. This might have helped mitigate the level of anti-social behaviour that has become a problem in the Southern Fringe developments.</p>	
<p>Important to provide a policy setting out how new community, sports and leisure facilities will be provided and sustained through new development. The type and scale of facilities should be commensurate to the size of the development proposed.</p>	<p>57178 (Southern & Regional Developments Ltd), 57253 (European Property Ventures -Cambridgeshire)</p>
<p>The proposed policy WS/CF makes clear that community, sports and leisure facilities are appropriate in mixed-use developments, such as Lion Yard, Grand Arcade & Guildhall Chambers. This is vital to ensuring continued vitality in this type of development.</p>	<p>57209 (Abrdn), 58208 (Universities Superannuation Scheme - Retail)</p>
<p>No Comment</p>	<p>57408 (Huntingdonshire District Council)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Request policy makes clear that education facilities serving a wider catchment area will not be considered a town centre use requiring sequential approach to be applied, but that any such facilities must be in sustainable, accessible locations.</p> <p>Plan states that new and replacement facilities should facilitate the growth of the area by providing sufficient capacity to accommodate community need and demand.</p> <p>Request an addition, explaining that in some cases this will include wider sub-regional community demand, and for educational facilities there is a national policy requirement to provide a sufficient choice of school places, which is not necessarily same as meeting a capacity need within a specific pupil place planning area.</p>	57485 (ESFA - Department for Education)
<p>Cambridge skateparks are not suitable for year-round use. To be suitable in winter, our local skateparks need lights (which could be extinguished late at night to discourage anti-social use), and rain cover. Simple adjustments to provide more space could also be implemented, such as smooth access paths (e.g. Jesus Green).</p>	58000 (J Humphrey)

Summary of issues raised in comments	Comments highlighting this issue
<p>No updated evidence on existing levels of open space and whether these are sufficient. In area where there is a lack of existing open space or facilities then enabling development may be required to ensure delivery.</p>	<p>58872 (Abbey Properties Cambridgeshire Ltd)</p>
<p>Support policy direction. The capacity of existing facilities and capacity offered by educational establishments needs consideration to ensure that provision is not sought, where capacity exists elsewhere.</p>	<p>59017 (Metro Property Unit Trust)</p>
<p>Planning policies should actively support the strategic plans of local health commissioners, and new health facilities to meet the needs of the population should be supported. It is essential that all planning policies enable flexibility within the NHS estate. Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation programmes, it should be accepted that a facility is neither needed nor viable for its current use and Planning policies within the Local Plan must support the principle of alternative uses for NHS land and property.</p>	<p>59183 (Cambridgeshire and Peterborough CCG)</p>

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy; should not rely on community hubs providing facilities as this will not meet all the diverse age and cultural needs.	59228 (Cambourne TC)
<p>Is it possible to guard against landlords who wish, at the end of a lease, to give notice to a Club on their land, or charge a rent so high that the Club is forced to leave?</p> <p>I note that The Infrastructure Delivery Plan will identify what facilities are needed. Is the Planning Department aware of the “Place Standard” Survey carried out by Cllr Sam Davies for Queen Edith’s and published in Feb 2020?</p>	59781 (B Hunt)
Community Healthcare facilities should be prioritised as they have been poorly provided for under the current Plan. Much stronger policy definition is required.	59856 (Barrington PC)
<p>Support for the policy however, clarification is needed:</p> <ul style="list-style-type: none"> • what is deemed ‘appropriate’ and thresholds for whether this will be on-site contributions or off-site? • what is considered to be a ‘large scale development’ i.e. is this major development as defined by the NPPF, or is this a locally set measure? 	60522 (Taylor Wimpey UK Ltd), 60576 (Countryside Properties - Fen Ditton site)

Summary of issues raised in comments	Comments highlighting this issue
<p>A good standard of education should be offered to all citizens and good schools can strengthen and stabilise local communities giving children and young people a steady foundation for their future. Growing inaccessibility to social care and services mean many families miss out on help, entrenching patterns of inequality throughout lives. A space to study at home and parents who provide books making a bigger difference than school attendance.</p>	<p>60775 (Cambridge and South Cambridgeshire Green Parties)</p>
<p>Need ways of giving ownership of the arts to young people. Better accessibility to community, sports and leisure facilities, and recreational green open spaces. Object to the built open space alongside the Meadows Community Centre in Arbury and want to see existing open spaces in Arbury turned into spaces for recreational use.</p>	<p>60775 (Cambridge and South Cambridgeshire Green Parties)</p>

WS/MU: Meanwhile uses during long term redevelopments

Hyperlink for all comments

Open this hyperlink - [Policy WS/MU: Meanwhile uses during long term redevelopments](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section

17

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

A wide variety of organisations, citizens, landowners, and developers expressed support for this policy. Persimmon Homes East Midlands were supportive of the policy but asked that it was not mandatory. A few respondents asked for the policy's scope to be amended to include different uses: Cambridgeshire and Peterborough CCG for example asked for developers to provide short-term solutions for the NHS to deliver services for new residents whilst development was taking place, Cam-Skate asked for skateboard facilities to be included in the policy and Cambridge and South Cambridgeshire Green Parties recommended that temporary spaces be used to assist with unaffordable housing via property guardianship. Several respondents objected to 'meanwhile uses' being implemented in the Green Belt.

Table of Representations: WS/MU - Meanwhile uses during long term redevelopments

Summary of issues raised in comments	Comments highlighting this issue
Support for the overarching aims of the proposed meanwhile uses during long term redevelopments policy.	56631 (Gamlingay PC), 56983 (Trumpington Residents Association), 57409 (Huntingdonshire District Council), 57717 (Bassingbourn-cum-Kneesworth PC), 57881 (Histon & Impington PC), 58005 (J Humphrey), 58725 (University of Cambridge), 58847 (CBC Limited, Cambridgeshire County Council and a private family trust), 59231 (Cambourne Town Council), 60154 (U&I PLC and TOWN), 60765 (U+I Group PLC)
Meanwhile use on sites proposed in Green Belt while waiting for consents should not be permitted	56903 (Save Honey Hill Group), 57616 (J Pratt)
Supportive of requirement but this should not be mandatory.	57388 (Persimmon Homes East Midlands)
Support: Cambridge has a real lack of indoor skateboarding facilities.	58117 (G Gardner - Cam-Skate)
Support including NHS services. Developers need to provide (at their own cost) flexible short term solutions for the NHS to deliver services for new residents whilst wider development is taking place.	59186 (Cambridgeshire and Peterborough CCG)
Recommend temporary spaces and buildings are used to assist with unaffordable housing via property guardianship.	60776 (Cambridge and South Cambridgeshire Green Parties)

WS/IO: Creating inclusive employment and business opportunities through new developments

Hyperlink for all comments

Open this hyperlink - [Policy WS/IO: Creating inclusive employment and business opportunities through new development](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section

20

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There was some support for the aims of policy from a mix for parish councils, private developers and other agencies. A number of developers discussed how the development of their site would support the policy. Several suggestions were made for the detailed policy wording including:

- its application only to strategic development over a certain scale;
- flexibility where it is not possible meet the policy due to local circumstances or the availability of labour;
- the inclusion of text that supports employment related development that would generate high skilled jobs locally;
- requiring developers to offer apprenticeship scheme linked to Further Education opportunities.

There were also a number of objections to the proposed policy direction with the Home Builders Federation suggesting that it is not justified against the tests set out in the NPPF and the CIL regulations with work already taking place to improve skills and opportunities through the CITB.

Questions were asked around how expansive the definition of “inclusive” would be and how it would address socio-economic exclusion. There was also a request for support for more opportunities for young people to develop in the science and tech sectors and within Cambridge University.

Table of Representations: WS/IO - Creating inclusive employment and business opportunities through new developments

Summary of issues raised in comments	Comments highlighting this issue
Support for the overarching aims of the proposed creating inclusive employment and business opportunities through new developments policy.	56632 (Gamlingay PC), 57719 (Bassingbourn-cum-Kneesworth PC), 59234 (Cambourne TC), 60225 (Thakeham Homes Ltd), 60279 (Commercial Estates Group), 60554 (Thakeham Homes Ltd), 60577 (Countryside Properties - Fen Ditton site)
The creation of more jobs creates need for more homes.	(56749) Croydon PC
Policy is best suited to large strategic sized developments of over 500 dwellings and New Town proposals.	57179 (Southern & Regional Developments Ltd), 57254 (European Property Ventures Cambridgeshire)
Object	57389 (Persimmon Homes East Midlands)
No comment	57410 (Huntingdonshire District Council)

Summary of issues raised in comments	Comments highlighting this issue
To achieve an increase in high skilled jobs, text should be included within Policy WS/IO that supports employment related development that would generate high skilled jobs within the local area.	57420 (Mission Street Ltd)
How will the Plan ensure that employment opportunities in new developments are ones which meet descriptions of being “inclusive” beyond the statutory requirements on protected characteristics? How can the Plan prevent the type of socio-economic exclusion in the current Cambridge job market?	58009 (Cambridge Doughnut Economics Action Group)
Need to support local community engagement with the construction industry. Investment should give residents the opportunity to gain employment and skills on development sites. Developers need to offer apprenticeship scheme linked to Further Education opportunities.	58957 (bpha)
Unclear how this Policy is justified against the tests set out in NPPF paragraph 57 and regulation 122 of the CIL Regulations.	60155 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
The construction industry already contribute to improving skills and opportunities through CITB, who are leading a variety of programmes to develop skills.	
Support for Policy, however some flexibility in the policy is needed as it may not always be possible or realistic to meet the policy requirements due to local circumstances or labour availability at the time of works.	60523 (Taylor Wimpey UK Ltd)
Support for Policy, however there are no routes into the science & tech business and Cambridge University careers for local citizens. There needs to be more opportunities for young people to grow and develop their skills, knowledge and passions with interesting careers.	60777 (Cambridge and South Cambridgeshire Green Parties)
Marshall has a strong interest in creating inclusive employment and business opportunities, in accordance with the policy objectives of Policy WS/IO.	58541 (Marshall Group Properties)
Need for spaces for small and medium companies and incubation spaces across Cambridge. The Campus expansion will allow for such spaces alongside other flexible business uses and is an opportunity to create inclusive employment and business opportunities.	58850 (CBC Limited, Cambridgeshire County Council and a private family trust)

WS/HS: Pollution, health and safety

Hyperlink for all comments

Open this hyperlink - [Policy WS/HS: Pollution, health and safety](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section

21

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

A wide variety of respondents expressed support for this policy. The Environmental Agency supported the policy but argued that its scope needed to be widened to protect Cambridge's aquifer. The Environmental Agency also noted that hazardous facilities have the potential to pollute the environment, but strategic planning of waste and resources can address this issue. The University of Cambridge also asked for the policy's scope to be widened so that it will protect Cambridge's research environment; specific requests included adding mitigation against electromagnetic interference into the policy and protecting research undertaken by the Mullard Radio Astronomy Observatory. Croydon PC asked for the policy to be reviewed in the context of major transport infrastructure and Linton PC asked for exclusion zones around key infrastructure cables and sites.

Some parish councils argued that pollution levels were unacceptable, so the monitoring of existing high-density areas is required, and mitigation measures should be implemented in areas of new development. Similarly, the Cambridge and South Cambridgeshire Green Parties included numerous recommendations to address pollution in existing city-centres and new settlements. Trumpington Resident Association argued that reducing light pollution should not be used to justify not lighting pedestrian desire lines. Several developers objected to the policy, arguing that it fails to recognise that potential negative impacts from development can be mitigated against.

Table of Representations: WS/HS - Pollution, health and safety

Summary of issues raised in comments	Comments highlighting this issue
Support for the overarching aims of the proposed pollution, health and safety policy.	57027 (The Wildlife Trust), 57578 (Save Honey Hill Group), 57720 (Bassingbourn-cum-Kneesworth PC), 58813 (University of Cambridge), 59189 (Cambridgeshire and Peterborough Clinical Commissioning Group CGC), 59240 (Cambourne TC), 60010 (Steeple Morden PC), 60478 (Anglian Water Services Ltd), 60424 (Great and Little Chishill PC)
No comment	57411 (Huntingdonshire DC)
The policy needs to be considered in the context of major road and rail infrastructure which will cause pollution.	56750 (Croydon PC)

Summary of issues raised in comments	Comments highlighting this issue
The need to minimise light pollution should not be used as a reason to not light pedestrian desire lines as this would contradict the aim of reducing car use.	56984 (Trumpington Residents Association)
Pollution in some areas is perceived to be at unacceptable levels in certain areas, so monitoring of existing high-density areas is required, and mitigation measures should be implemented in areas of new development.	57883 (Histon & Impington PC)
Policy should include reduction of noise, light pollution and improvement of air quality along with exclusion zones around gas, electric cables and water treatment plants.	58444 (Linton PC)
Electromagnetic interference (EMI) should also be included in the policy.	58813 (University of Cambridge)
The policy should help to protect the research environment including equipment, which is sensitive to noise, vibration and not just human receptors.	58813 (University of Cambridge)
Policy to protect research undertaken by the Mullard Radio Astronomy Observatory at Lord's Bridge should be rolled forward into the Local Plan.	58813 (University of Cambridge)
Would welcome a policy that details how land contamination should be considered, which would ensure land is suitable for	59729 (Environmental Agency)

Summary of issues raised in comments	Comments highlighting this issue
end-use, but also ensures that the quality of underlying aquifers is protected.	
Welcome the fact that the policy will provide protection to and from hazardous installations, however these facilities also have the potential to pollute the environment. Strategic planning of waste and resource use provides the opportunity to address this issue.	59729 (Environmental Agency)
As part of Anglian Water's Statement of Common Ground with the two Councils, they would welcome support in the Price Review 2024 submissions for their case for greater investment in river health in AMP8 (2025 - 2030).	60478 (Anglian Water Services Ltd)
Anglian Water want to work with the two Councils to develop a low-energy intensity approach to the design and operation of assets. In relation to the policy, the new wastewater recycling facility will seek to reduce emissions compared to the existing facility.	60478 (Anglian Water Services Ltd)
Argue that the policy fails to recognise that impacts could be mitigated against it. It is suggested that the wording of the policy is changed to:	60524 (Taylor Wimpey UK Ltd), 60579 Countryside Properties – Fen Ditton site

Summary of issues raised in comments	Comments highlighting this issue
<p>'we propose that this policy will require that development does not lead to, or is subject to significant adverse effects as a result of noise, vibration, odour, and/or light pollution unless these effects can be satisfactorily mitigated against'.</p>	
<p>Welcomes initiatives to reduce movements within settlements and to enhance active or electric transport. In addition to this, the Party lists aspirations that it wants to deliver including: an emissions-free zone in the centre of Cambridge, major investment into active transport and bus networks, low traffic neighbourhoods, strict rules against vehicle idling, and accelerating the shift to electric vehicles. Furthermore, the Party supports the embedding of certain elements into new settlements including: cycle greenways, parking permits to ensure parking is a deterrent, ensure advance green phases for bicycles and the implementation of 'European-style' provision for cycles, pedestrians and disabled people.</p>	<p>(60778) Cambridge and South Cambridgeshire Green Parties</p>

WS/PH: Protection of public houses

Hyperlink for all comments

Open this hyperlink - [Policy WS/PH: Protection of public houses](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section

15

Abbreviations

- PC= Parish Council DC= District Council TC= Town Council

Executive Summary

The majority of respondents expressed support for the policy and the approach to protecting public houses. Support mainly came from Parish Councils. Some comments supporting the policy approach raised that although public houses should be protected, in some circumstances it may not be viable so the policy should allow for their loss. Similarly, one PC suggested the policy should be realistic in its approach if the local community cannot support a public house. However, Cambridge Past, Present & Future suggested the policy could safeguard public houses by nominating them as assets of community value. This was also reflected in other PCs comments regarding the importance of public houses in providing positive impacts and employment opportunities for

communities. The Cambridge and South Cambridgeshire Green Parties thought that the policy focus on public houses doesn't reflect the other types of community assets that need safeguarding.

Table of Representations: WS/PH - Protection of public houses

Summary of issues raised in comments	Comments highlighting this issue
Support for the overarching aims of the proposed protection of public houses policy.	56640 (Gamlingay PC), 57227 (Abrdn), 57595 (R Pargeter), 57728 (Bassingbourn-cum-Kneesworth PC), 58217 (Universities Superannuation Scheme – Retail), 58463 (Linton PC), 59933 (Fen Ditton PC), 60016 (Steeple Morden PC), 60092 (Guilden Morden PC)
Policy should be realistic as some communities cannot support a public house.	56758 (Croydon PC)
To help safeguard public houses in the villages, the supporting text to the policy could encourage nominations as assets of community value.	58871 (Cambridge Past, Present & Future)
Support for policy that allows for the loss in some circumstances where public houses are no longer viable.	57227 (Abrdn), 58217 (Universities Superannuation Scheme – Retail)
Condition could be included that if part of the pub is agreed for another use, the marketing policy remains.	60016 (Steeple Morden PC)
Denying permission for change of use will not work unless they can remain financially viable.	57595 (R Pargeter)

Summary of issues raised in comments	Comments highlighting this issue
Sustainable public houses are important as they provide positive impact on village communities.	60414 (Great and Little Chishill PC)
Pubs are important as they offer employment opportunities.	60414 (Great and Little Chishill PC)
The focus on public houses doesn't reflect the diversity of the city, as there are other types of community asset in danger.	60787 (Cambridge and South Cambridgeshire Green Parties)
"Talk the talk, but will they walk the walk?"	59828 (Dry Drayton PC)
No comment.	57421 (Huntingdonshire District Council)

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