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	PM/SC/2/K	Objectively Assessed Need
	PM/SC/2/L	Objectively Assessed Need
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## Proposed Modifications to the Cambridge Local Plan 2014: Proposed Submission

### Main Modifications

#### Section 2: The Spatial Strategy

Proposed Modification: PM/CC/2/A Figure 2.1: Key Diagram			
<b>Representations Received</b>	Support: 3	Object: 4	Total: 7
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>Support from <b>CPPF; Rustat Road Neighbourhood Association; and Residents' Association of Old Newnham.</b></li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li><b>CEG</b> argue that the latest transport and infrastructure studies do not support the chosen locations for housing development, including Land North of Cherry Hinton.</li> <li><b>CEG</b> argue that the updated transport modelling does not provide any evidence that this scheme will not directly be dependent on the Newmarket to Cambridge transport corridor.</li> <li>Key Diagram (PM/CC/2/A) should be modified to remove GB1 and GB2. The basic need is already overshoot without these two sites, both of which are acknowledged in the revised plan as being of real importance to the city setting.</li> </ul>		
<b>Councils' Assessment</b>	<p>Support noted.</p> <p><u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/CC/3/A.</p>		
<b>Approach to Proposed Modification</b>	<p>No Change as a result of the representation relating to PM/CC/2/A.</p> <p>Consequential change required to PM/CC/2/A as a result of changes proposed to allocation GB2 under modification PM/CC/2/E.</p>		

Proposed Modification: PM/CC/2/B Paragraph 2.17			
<b>Representations Received</b>	Support: 9	Object: 18	Total: 27
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li><b>Cambridge PPF, Windsor Road Residents Association</b> Evidence supports provision for 14,000 new homes, taking account of national guidance and market forces.</li> <li>General support for provision of 14,000 new homes and evidence to support it.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Meets housing need.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Cambridgeshire County Council Strategic Assets Team</b> PBA report inadequate. Provision at lower end of possible options and does not boost housing supply. The housing crisis and need for affordable housing require a housing target of 42,780 dwellings for both authorities together.</li> <li>• <b>NBRLOG</b> PBA report not compliant with national guidance. It does not consider housing needed to match economic growth. Its demographic assumptions are flawed in respect of household formation rates. It does not consider land prices as a market signal. It does not enhance affordability and provide an uplift to address affordable housing need in Cambridge. Housing target for Cambridge should be 15,200 dwellings. If this cannot be met in Cambridge it must be met elsewhere through Duty to Cooperate agreements..</li> <li>• <b>Grosvenor Developments Ltd</b> House prices 45% above 2007/08 peak in Cambridge and 25% in South Cambridgeshire compared to 2.5% rise in England and Wales. Comparator authorities used in PBA report not appropriate. A dwelling uplift to the OAN of significantly more than 30% justified for Cambridge and more than 20% for South Cambridgeshire.</li> <li>• <b>CEG</b> PBA report does not take account of suppressed household formation for young adults due to past housing undersupply (5,671 in Cambridge and 5,600 in South Cambridgeshire) which is a major flaw. Housing growth will not support the jobs target of 44,000. A future shortage of 7,000 to 12,000 workers will be the result. This will lead to a large growth in in-commuting into Cambridge and South Cambridgeshire. Huntingdonshire, Fenland and East Cambridgeshire cannot be relied on to provide the necessary workers. No upward adjustment to OAN is proposed to provide more affordable homes in Cambridge. Combined housing target of 41,000 justified to return household formation to pre recession trends and support plan jobs target. Eastleigh is not a good comparator for Cambridge on which to determine appropriate uplifts.</li> <li>• <b>Home Builders Federation</b> Agree 30% uplift for Cambridge OAN but in regard to a different baseline. Cambridge OAN should be 17,000.</li> <li>• PBA report identifies an appropriate OAN for Cambridge of 10,069 homes (Edge Analytics), a 30% uplift gives 13,209 homes not 14,000. On this basis sites GB1 and GB2 do not need to be released from the Green Belt as no exceptional circumstances exist.</li> <li>• <b>Emmanuel and Gonville and Caius, U&amp;B, Endurance</b></li> </ul>
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	<p><b>Estates, Pembroke College and Balaam Family</b> PBA report is flawed because it does not consider economic trends. Market signals indicate long term undersupply compared to demand. It is not compliant with national guidance. OAN should be higher to boost housing supply. OAN should be 17,930 homes.</p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land and LIH</b> The SHMA was not compliant with national planning practice guidance. PBA report underestimates OAN. Its demographic projections do not take into account past suppression of household formation in young adults. Economic growth expectations are not addressed meaning housing provision and economic growth are not aligned. The resulting lack of local labour will increase in-commuting from outside Cambridge and South Cambridgeshire by 14,900 workers (1 in 3 jobs) which is unsustainable. Significant key market signals on land prices and past under delivery have not been assessed. Our evidence shows Cambridge market signals are much worse than elsewhere in the East of England and are comparable to London. Housing affordability not addressed. No uplift provided to boost affordable housing. Cambridge OAN should be 15,200 homes and South Cambridgeshire's 27,000 homes to 2031. Chosen comparator authorities not appropriate, an uplift to OAN of significantly more than 30% justified for Cambridge and 30% for South Cambridgeshire .</li> <li>• <b>Grosvenor</b> The housing figures will not deliver sufficient new homes to tackle the need for affordable housing in Cambridge. At the end of the plan period the back log will be greater than at the start of the plan period.</li> <li>• <b>St Johns College</b> PBA report underestimates strength of market in Cambridge and S Cambs. 42,226 homes required across both authorities (15,230 in Cambridge and 27,230 in S Cambs). Imbalance between houses and jobs resulting in in-commuting - unsustainable plan. Current housing growth will not support growth in jobs. Lower rate of growth than previously planned for - not consistent with NPPF. Will result in deterioration in housing affordability; constraint on economic growth; inadequate supply of affordable housing. Market signals show housing prices in Cambridge and South Cambs very high and it is one of the least affordable areas to live in the region. PBA underestimates strength of market evidence up to 2014 - out of date.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p><u>Boost Housing Supply</u> A number of representations consider that the provision of 33,500 new homes across Cambridge and South Cambridgeshire will not boost housing supply significantly. This view is contradicted by the</p>

Councils evidence in the SHMA, which was considered at the Matter 3 hearings in November 2014 and by Further Evidence on OAN prepared for the Councils by Peter Brett Associates (PBA) in November 2015 (RD/MC/040). The SHMA took an integrated approach to demographic trends and future employment and identified a OAN of 33,000 for the two authorities (14,000 Cambridge and 19,000 for South Cambs). The PBA report November 2015 Further Evidence report looked at past demographic trends and market signals and identified an OAN of 19,337 for South Cambs (rounded by the Councils to 19,500) and 13,090 for Cambridge. To meet the tests in PPG and to boost housing supply significantly the Councils have chosen the higher figure for OAN for both authorities from either the SHMA or the PBA Further Evidence report.

Not compliant with National Guidance

A number of representations seek to demonstrate that our approach to calculation of OAN is not consistent with national guidance. This was a matter considered at the Matter 3 hearings in November 2014 and is not an issue on which the Inspectors letter of 20 May 2015 asked the Council to address.

Nevertheless, in undertaking the additional work requested by the Inspectors in their letter, the Further Evidence report by PBA ensures consistency for those issues with national guidance, which was published too late to inform the Local Plans.

Market Signals / OAN Uplift

Concerns are expressed that the Councils PBA Further Evidence on OAN report of November 2015 has not properly taken into account market signals including affordability, house prices and land prices and that the appropriate uplifts for each Council should be higher. The PBA Further Evidence report analysed the market signals in the PPG and concluded that they warranted upward adjustment to the demographic starting point of 30% for Cambridge and 10% for South Cambridgeshire.

PBA have prepared a response to objectors for the Councils (RD/MC/041 - March 2016). Regarding house prices it concludes that when considered over appropriate time periods the house price comparisons made to Canterbury for Cambridge, and to Uttlesford and Eastleigh for South Cambridgeshire remain appropriate. Regarding land prices it finds that the period presented in the Savills' land price analysis bears no relationship with the demographic projections and that there are technical limitations to the utility of the Savills' in-house land price index. In respect of affordability PBA report that the Savills' data for 2014 tells us nothing about whether the starting point demographic

projections should be uplifted, because those projections carry forward trends that ended in 2013 and take no account of anything that happened in 2014.

The appropriate market signals uplift for Cambridge remains 30% and for South Cambridgeshire 10%.

#### Household Formation Rates

The PBA Further Evidence report on OAN (November 2015) took its household formation rates from the 2012 based CLG household projection (which remains the most up to date official release). Several objectors maintain that these rates should be increased particularly for young adults to provide a partial or total return to the higher rates expected by the earlier CLG 2008 projection. The PBA response to objectors of March 2016 document looks at this issue in detail and concludes that there is no justification for upward adjustment to the CLG 2012 household formation rates. At a national level these remain the best available view of future household formation, as stated in the PPG and confirmed by authoritative studies and recent Inspectors' findings. At a local level the evidence from formation rates does not provide robust evidence on the balance of the market.

It is agreed that the starting point demographic projections require adjustment to reflect future housing need. Uplifts to demographic starting points of 30% for Cambridge and 10% for South Cambridgeshire are appropriate. However this should be done directly to the housing numbers rather than via amending household formation rates as objectors propose. PBA give two reasons for this approach, first because formation rates are an unreliable indicator of housing market balance, and second because in real life, supply constraints suppress net in-migration as well as household formation rates.

#### Jobs/Economy/Commuting

A number of representations concern the lack of alignment of jobs and housing in Cambridge and South Cambridgeshire and the resulting reliance on high and increasing levels of in-commuting. The Local Plans providing together for 33,500 homes and 44,000 jobs by 2031.

These points largely relate to issues which have already been considered during the Matter 3 hearings in November 2014 which looked at the extent of the HMA, existing and future commuting levels and how the SHMA took account of housing and economic needs including forecast job numbers. The Councils maintain their view that the HMA is the wider area covered by the SHMA, within which there is a good balance between jobs and homes.

	<p>The Councils are aware that the latest update to the EEFM forecasting model is to be published shortly. If the jobs forecasts differ significantly from the ones relied on by the SHMA the most appropriate response would be to address this through an early Local Plan review. It is important to complete the examination process as quickly as possible to replace the adopted plans that cover the period to end of March 2016, and to provide certainty over the development strategy moving forward. This update will be considered when published and a report will, as necessary and appropriate, be provided to the examining inspectors as to any relevant implications which may arise.</p> <p><u>Affordable Housing</u> A number of objectors maintain that the OAN for housing should be higher to support more affordable housing, especially in Cambridge where around half of affordable housing need can be met through planned development.</p> <p>The PBA Further Evidence report of November 2015 advised that such an approach would depend partly upon capacity being available but that realistically such provision might undermine housing development in other parts of the housing market area and probably not reduce the local shortage of affordable housing. Regarding capacity in Cambridge the Councils have looked carefully at housing land supply in Cambridge (see assessment under modification PM/CC/2/H), the Green Belt (see assessment under modification PM/CC/2/E) and the development strategy (see assessment under modification at PM/CC/2/D). Proposed modification PM/CC/3/A to increase the allocation north of Cherry Hinton will provide for an additional 430 homes in Cambridge which could provide an additional 172 affordable homes at 40% provision.</p> <p>The PBA response to objectors report (RD/MC/041 - March 2016) has considered this issue further and identified a number of Inspectors Reports which support the judgement that any adjustment should be modest and realistic. Overall the Councils consider that the plans provide for a realistic proportion of affordable need to be met in Cambridge.</p> <p><u>Green Belt sites GB1 and GB2</u> See assessment under modification PM/CC/2/G.</p>
<p><b>Approach to Proposed Modification</b></p>	<p>No Change. Submit proposed modification PM/CC/2/B to the Examination Inspectors.</p>

Proposed Modification: PM/CC/2/C New paragraph after 2.17 – Memorandum of Understanding regarding Joint Housing Trajectory			
<b>Representations Received</b>	Support: 3	Object: 11	Total: 14
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents’ Association of Old Newnham</b> Support all amendments.</li> <li>• <b>Cambridge Past Present and Future</b> Cambridge has restricted supply of land available for development. If the Green Belt is to be retained, common sense should dictate that the housing trajectories should be considered jointly as the two Councils are so inter-twined. The Councils are discharging their statutory Duty to Cooperate, including the need for neighbouring authorities to plan together.</li> <li>• <b>Rustat Road Neighbourhood Association</b> Support Memorandum of Understanding – please to see further example of joint working.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Commercial Estates Group</b> The Councils are committed, via the City Deal and the underlying rationale for the Joint Trajectory, to an early review of the Local Plans but this is not captured anywhere within the plans themselves.</li> <li>• <b>North Barton Road Landowners</b> Request all references to joint trajectory are deleted. NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual LPAs. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.</li> <li>• <b>Grosvenor &amp; USS</b> Delete MoU. Both plans identify that they are meeting their own needs, therefore no need for joint five year housing trajectory. Significant concerns as to how the approach will work in practice and how any shortfall will be rectified. In which local authority area would that shortfall be made up? What happens in the circumstances where there is persistent under delivery in one local authority - should a 5% or 20% buffer be applied?</li> <li>• <b>Home Builders Federation</b> Not clear what the Council is proposing. The Councils have not prepared a joint plan, therefore each will need to produce its own housing trajectory supported by a five year housing land supply in accordance with the NPPF. The two Councils appear to want the benefit of joint plan but without having to surrender political control. Cambridge will need to manage its land supply to ensure that the need is delivered by 2031</li> </ul>		

	<p>and it cannot count completions in South Cambs as counting towards its five year housing supply.</p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land &amp; LIH</b> South Cambs and Cambridge have separate local plans and should therefore have separate housing trajectories. The fact that the City Deal has been signed does not provide justification for the joint approach to the delivery of housing. This was confirmed by the planning appeals at Waterbeach.</li> <li>• <b>Pembroke College &amp; Balaam Family, Endurance Estates, Unwins &amp; Biggs, Emmanuel and Gonville &amp; Caius, and Bidwells</b> Joint trajectory does not comply with NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against <u>their</u> housing requirements. The two Councils are still proceeding with separate plans, with separate identified sites to meet their individual housing requirements. There has been no cross boundary sharing of housing needs. The proposed approach has been introduced late in the plan making process to mask deficiencies in the Councils housing land supply in the early part of the plan period. The preparation of the Local Plans has not specifically considered the need to adopt a cross boundary approach to meeting the objectively assessed housing needs. Cambridge has failed to demonstrate why it would not be possible to maintain a rolling 5-year supply of housing within its own boundary.</li> <li>• This was not the basis on which the original plans were compiled – ruse to fudge figures.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p><u>Principle of MoU</u> The Councils agreed a Memorandum of Understanding (MoU<sup>1</sup>) on the Greater Cambridge Joint Trajectory in September 2014. The MoU set out the agreement that the housing trajectories for Cambridge and South Cambridgeshire should be considered together for the purposes of the phasing of housing delivery, and for calculating five year supply for plan making and decision taking. The Councils remain committed to each providing its own OAN within its area. The MoU responds to and is justified by a number of changes in circumstance since the plans were submitted, which are outlined in detail in the Councils' Matter 8 hearings statement (see paragraph 76).</p> <p><u>Consistency with National Policy</u> The Councils are firmly of the view that the MoU is soundly based and consistent with national policy. Both plans are consistent with</p>

<sup>1</sup> Memorandum of Understanding: Greater Cambridge Joint Housing Trajectory (RD/STRAT/350)



paragraph 47 of the NPPF in that both Councils have committed to meeting their own objectively assessed needs in full within their respective areas. Paragraph 47 does not say that a local planning authority must meet its five year supply requirement within its area. The PPG specifically provides for a local authority to take the approach adopted in the MoU, stating that local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible, however where this cannot be met in the first five years, local planning authorities will need to work with neighbouring authorities under the Duty to Co-operate. Paragraph 181 of the NPPF also states that fulfilling the Duty to Cooperate should be a continuous process of engagement from initial thinking through to implementation.

Concerns how a Joint Trajectory and Five Year Supply will Work in Practice

Respondents have queried how a joint trajectory and joint five year supply will work in practice, for example if it is determined that a different buffer should be applied to each local authority, and if the two local authorities cannot demonstrate a joint five year supply, which local authority will make up the shortfall. The two Councils will work together under the duty to co-operate to ensure that the joint trajectory and joint five year supply will work in practice. The joint five year supply has so far been calculated using the total housing requirement for the Greater Cambridge area and the total actual and predicted completions. However the joint five year supply can be calculated for each local authority using the relevant buffer and then added together if that is determined to be appropriate. If a shortfall arises, the two Councils will work together under the duty to co-operate to determine how the shortfall will be overcome, including considering whether a review of the Local Plans is needed. The Councils have committed through the City Deal to start the preparation of a joint plan in 2019.

Consideration of Alternatives / Not Demonstrated/Unable to be Achieved in Cambridge

The consequences of not endorsing the joint trajectory could be significant. For South Cambridgeshire to provide a 5 year supply alone, it would need to identify a significant number of additional homes that could be delivered in the next 5 year period. It is most likely given the nature of the district that the majority of these would have to be in villages, as urban extensions or new settlements would require more planning and infrastructure. It would be contrary to the submitted sustainable development strategy to provide a significant number of additional sites in the villages, which are at the bottom of the development sequence, to enable South Cambridgeshire to demonstrate a five year supply simply due to the way that the major developments on the edge of

	<p>Cambridge are being delivered on the ground. Sites in villages are likely to be the only locations where development is likely to be capable of being delivered within the early years of the plan period and therefore contribute to the five year supply. In preparing the Local Plans, the Councils considered alternative options for the development strategy, including village focussed strategies. The analysis of alternatives is set out in the draft final Sustainability Appraisal Report<sup>2</sup> (see Part 3 Appendix 4). The submitted plan includes an element of housing in the rural area as part of a balanced development strategy, including allocation of 2,066 dwellings in the rural area and villages (excluding Cambourne West). It would not be part of a sustainable development strategy to provide significantly higher levels of development at villages when suitable sites higher up the development sequence are coming forward for development but that the phasing of those major sites on the edge of Cambridge means that they are providing an oversupply in Cambridge and an undersupply in South Cambridgeshire, simply because of the way those sites are building out from the edge of Cambridge, towards but not yet over the administrative boundary into South Cambridgeshire.</p> <p>South Cambridgeshire has demonstrated in the housing trajectory included in the Councils' Housing Land Supply Update 2015 (RD/MC/050) that it can deliver its full objectively assessed need. However due to the phasing of delivery, the Council is unable to demonstrate that it has a five year supply in the early years of the plan period using either the Sedgfield methodology or a 20% buffer. The Councils do not accept that this is the appropriate approach to calculating 5 year supply pending the Inspectors' conclusions but have calculated 5 year supply on all methods and buffers, including Sedgfield and 20% as the most onerous. The MoU ensures that the Councils can demonstrate a five year supply and is a logical step towards a joint Local Plan.</p> <p>Cambridge has also demonstrated in the housing trajectory included in the Councils' Housing Land Supply Update 2015 (RD/MC/050) that it can deliver its full objectively assessed need.</p> <p>Cambridge currently has a housing land supply of 14,682 homes. This is being delivered in both the urban area and within urban extensions on the edge of city. Towards the end of the plan period, allocations within the urban area are expected to continue to come forward to meet objectively assessed need.</p> <p><u>Undersupply position is worsening / No action to boost supply</u> There has been an increase in the number of dwellings completed</p>
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<sup>2</sup> Draft Final Sustainability Appraisal Report (RD/Sub/SC/060)

	in the Greater Cambridge area in the last two years, and individually within the two local authorities, compared to the first two years of the plan period. In 2014-2015, 1584 dwellings were completed in Cambridge and South Cambs. The Councils are working with landowners / developers to bring forward sites allocated in the adopted Local Plans and also submitted Local Plans.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/2/C to the Examination Inspectors.

<b>Proposed Modification: PM/CC/2/D</b>			
<b>Paragraph 2.30</b>			
<b>Representations Received</b>	Support: 4	Object: 7	Total: 11
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Trumpington Residents Association</b> – support the new evidence prepared by the Councils.</li> <li>• <b>Rustat Road Neighbourhood Association</b> - pleased that the additional work supports the Councils' previous position</li> <li>• <b>Residents' Association of Old Newnham</b> – support.</li> <li>• Glad that the vast majority of the Green Belt is being protected.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Cambridge Past Present and Future</b> - SAA shows urban extensions were likely to be more sustainable than new settlements - closer proximity to city and facilities, although generate significant infrastructure problems. Council's opinion, more than outweighed by harm to setting of city through Green Belt release. Support Council's prioritisation of Green Belt. Should also highlight heritage impacts supports this view.</li> <li>• <b>Coalition of Parish Councils, Hardwick Parish Council, Caxton Parish Council</b> – New settlements face significant challenges, including providing infrastructure to make them viable. A428 busway at an early stage and will not make developments sustainable. Need an all-ways junction at Girton.</li> <li>• <b>Pembroke College and the Balaam Family</b> - SAA fails to recognise contribution of village growth.</li> <li>• <b>Pembroke College and the Balaam Family</b> - Plans don't achieve the 'right balance' across the development hierarchy. Over reliant on new settlements. Options discounted due to Green Belt on edge of Cambridge and Better Served villages.</li> <li>• <b>Pigeon Land Limited</b> - There are inconsistencies and inaccuracies in the assessment of the reasonable alternatives; the urban fringe sites, in both the Green Belt</li> </ul>		

	<p>Assessment and the SA Addendum Report which has resulted in a skew towards the allocation of new settlements.</p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land Limited</b> - The sustainability balance proposed in seeking to justify the dispersal of development into new settlements in South Cambridgeshire away from the centre of Cambridge is flawed.</li> </ul> <p><b><u>Main Issues related to Transport Evidence</u></b></p> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Local Plan with proposed modifications and Transport Study will not reduce the need for major transport infrastructure, not minimise the need to travel, not maximise the use of sustainable transport modes.</li> <li>• Strategy will promote ever greater car use, resulting in increased congestion, delays and journey times / travel distances, with corresponding increases in carbon emissions, deteriorating air quality, and with a detrimental impact on the health and wellbeing of local people. The modelling continues to forecast that between 2011 and 2031 delays in Cambridge will more than double and journey lengths will increase, resulting in severe impacts. It will reinforce existing travel patterns. Not tested if this will harm achievement of planned levels of job growth.</li> <li>• Councils own evidence demonstrates edge of Cambridge sites offer significantly better mode shares by sustainable modes than new settlements. Could also facilitate city deal schemes. Benefits have been ignored.</li> <li>• In the City the proportion of households without a car rises from 28% in 2011 to 31% by 2031. This is further evidence that there is a need for a greater amount of edge of Cambridge Development in order to secure a significant contribution to active mode/public transport trips necessary to achieve the modal shift targets</li> <li>• Mode shares at new settlements low despite significant interventions.</li> <li>• Evidence base shows that the residual impacts of development are severe and as such it is contrary to the NPPF, and the stated objectives of the draft Local Plans will not be achieved.</li> <li>• The new and additional transport modelling work continues to lack transparency and clarity. Inconsistency makes it difficult to understand the validity of the emerging findings. It does not provide objective comparative testing of sites on like for like basis.</li> <li>• Fails to provide further data on the relative impacts of the development scenarios on the highway network in the form</li> </ul>
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	<p>of comprehensive journey times for all scenarios, capacity constraints, vehicular numbers and changes in flow on key highway links</p> <ul style="list-style-type: none"> <li>• Failed to adequately test alternative quantum of development, including variations in site capacities put forward by representors.</li> <li>• The CSR modelling undertaken for the Local Plan is inconsistent with and contradicts the evidence published in the June 2015 A428 Corridor Study, published as part of the City Deal process. No evidence busway standard can be provided. Benefits assumed in CSR will not be achieved.</li> <li>• Modelling runs did not consider phasing of development before infrastructure.</li> <li>• The evidence fails to test the necessary development trigger points for the delivery of transport infrastructure, and how much development can take place prior to infrastructure e.g. on A428 corridor. Lack of certainty over delivery of infrastructure, which is not fully funded. No further evidence has been presented that shows the essential infrastructure is viable or deliverable in the necessary timescales. A10(N) study not completed, therefore uncertainty regarding measures needed for that corridor.</li> <li>• New transport infrastructure for new settlements will impact on Green Belt.</li> <li>• The assessment of sites do not reflect developer proposals. Sites are grouped with no explanation. CEG's proposals at South East Cambridge is contaminated by an unjustified assumption of requirement for a 'Strategic Link Road' between Yarrow Road and Addenbrookes Road.' Cambridge South testing excluded additional link off M11 roundabout.</li> <li>• Questionable assumptions regarding Park&amp; Ride patronage given falling patronage. Car traffic is growing on radial routes. Goals of the Cambridge Access Study would not be achieved.</li> <li>• Unclear which transport measures are included in the Do Minimum and Do Something testing.</li> <li>• Updated transport modelling does not appear to take into account the provisional allocation of land at E1/B.</li> <li>• Does not maximise use of existing infrastructure.</li> <li>• Lack of robust transport modelling does not facilitate a robust SEA/SA process</li> <li>• The Councils' proceeded to undertake the further work on the statement of common ground without engaging with Hearing participants towards a statement of common ground. Does not address questions raised at Examination</li> </ul>
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<p><b>Councils' Assessment</b></p>	<p>This section addresses comments made on:</p> <ul style="list-style-type: none"> <li>• development strategy</li> <li>• infrastructure delivery</li> <li>• viability</li> <li>• transport</li> <li>• sustainability appraisal</li> <li>• sites outside the Green Belt.</li> </ul> <p>It then responds to points made on the Councils' Transport evidence base.</p> <p><u>Development Strategy</u></p> <p>A number of representors question the Councils' choices regarding the balance of development between different locations, particularly the allocation of two new settlements rather than sites on the edge of Cambridge or village development.</p> <p>The development sequence was established by previous plans and, following reconsideration, is continued in the Submitted Local Plans. It remains an appropriate response to planning for the Greater Cambridge area. The Local Plans must determine the balance of growth that takes place at each stage of the sequence. The Councils' Development Strategy Update (RD/MC/060), informed by evidence including the Joint Sustainability Appraisal Addendum (RD/MC/020), considers this balance. It sets out the range of sustainability issues and planning evidence considered by the Councils, the weight applied to those issues, and the reasoning for the preferred approach.</p> <p><i>Green Belt versus New Settlements</i></p> <p>The Development Strategy Update (RD/MC/060) and the Joint Sustainability Appraisal Addendum (RD/MC/020) set out how the issue of Green Belt has been considered through plan making, meeting the requirements of paragraphs 84 and 85 of the NPPF to consider the sustainability impacts of developing outside the Green Belt compared with removing land from the Green Belt for development.</p> <p>Whilst urban extensions to Cambridge offer relative benefits to some sustainability issues over other options, the Councils' evidence continues to highlight the significant harm that would be caused to the purposes of the Cambridge Green Belt if further land were to be released for development. The Councils' position remains that the need for jobs and homes can constitute exceptional circumstances justifying the release of land from the Green Belt but only so far as would not cause significant harm to Green Belt purposes. Green Belt issues are addressed under modification PM/CC/2/E.</p>
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The Councils have considered transport issues alongside wider planning issues throughout the plan making process. The Transport Strategy for Cambridge and South Cambridgeshire, which forms part of the Local Transport Plan, was prepared by the County Council alongside the Local Plans. The Proposed Modifications consultation was supported by the Local Plans CSRM – Cambridge and South Cambridgeshire Local Plans Transport Report, (November 2015) (RD/MC/070), which provided further comparisons of the transport impacts of different strategy options, as well as considering the impacts of the proposed modifications.

This ensured in particular that the relative merits of land on the edge of Cambridge in transport terms compared with the necessary transport infrastructure requirements of new settlements is understood and taken into account in determining the appropriate development strategy. The Transport Report (paragraph 5.64) identifies that new settlements tested would not deliver the mode share of trips by sustainable modes anticipated from edge of Cambridge sites. However, with the provision of the sustainable transport measures proposed in the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC), including park & ride and cycling, this would deliver a significant increase in the proportion of trips made by non-car modes from new settlements.

The Transport evidence is considered to provide a sound evidence base to support plan making, reflecting the requirements of the Planning Practice Guidance. More detailed consideration of representations regarding the transport technical evidence is included in a separate section below.

*More development in villages and the rural area*

A number of representors consider that further development should be allocated in villages, in addition to or as alternatives to sites in the submitted Local Plans. The approach to villages, justified in the Councils' Development Strategy Update (RD/MC/060) paragraphs 4.35 to 4.41, is considered appropriate. A dispersed strategy would not enable the focused delivery of new infrastructure or improvements in transport infrastructure to support travel by sustainable modes. Education provision would be a significant constraint on development in many villages, with schools unable to be expanded to accommodate additional pupils. A wide range of sites were tested through the SHLAA and SA process. A significant number were rejected, for example due to flood risk, or infrastructure constraints such as education. The reasons these sites were not included in the submitted Local Plan

	<p>remain sound. The Local Plans provide an appropriate balance of development at different levels of the search sequence. The strategy supports some growth at better served villages, though identified allocations where it will support early delivery of sites.</p> <p>Evidence continues to demonstrate that the smaller villages are the least sustainable locations for growth other than to meet local needs. Policies in the Submission South Cambridgeshire Local Plan provide flexibility for appropriate development in the rural area to meet local needs, but smaller villages should not be a focus of allocations to meet wider housing needs.</p> <p>The strategy across the two Local Plans seeks to develop land within the urban area of Cambridge where there is capacity, deliver additional development on the edge of Cambridge where it would not cause significant harm to Green Belt purposes, deliver new settlements where there is potential to provide sustainable transport infrastructure to connect with jobs and services, and deliver limited allocations at the better served villages to support rural communities and provide early housing delivery. This approach is considered a sound response to the evidence and the issues raised through the plan making process.</p> <p><u>Infrastructure Delivery</u></p> <p>The Proposed Modifications were informed by an updated Infrastructure Delivery Study (IDS 2015) (RD/MC/080). The IDS 2015 updated previous studies carried out in 2012 &amp; 2013 to inform the Local Plans.</p> <p>The IDS 2015 reviewed the infrastructure needs of the area, including infrastructure needed to support the developments in the Local Plans. It draws on a range of sources, including input from stakeholders and infrastructure providers. It was also informed by the Viability Update 2015 (RD/MC/090), which considered the potential funding that could be secured from developments to support the delivery of infrastructure.</p> <p>The IDS 2015 considers the delivery of transport infrastructure to support growth. A number of representatives question the delivery and funding of this infrastructure. The total cost of transport infrastructure schemes, including essential and desirable schemes, exceeds the level of funding identified at this point. This is not unusual when considering a long term strategic plan alongside existing infrastructure deficits that exist within the area.</p> <p>Many of the transport schemes identified perform a wider sub regional role in serving the Greater Cambridge area as well as serving individual developments. Strategic developments will be</p>
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	<p>able to make a contribution to strategic transport schemes as well as on site infrastructure. There are a range of non-developer infrastructure funding sources which will assist the delivery of essential infrastructure in the Greater Cambridge area. The most significant of these is the City Deal. Up to £500m grant funding has been secured specifically designed to provide infrastructure to help unlock growth.</p> <p>A position statement was presented to the City Deal Board on 3 March 2016. This set out the role of the City Deal in supporting the delivery of the development strategy contained in the Local Plans. The intention of the statement is to provide clarity, in light of the representations which have been made, to the Local Plan Inspectors who are examining the Local Plans. The statement is as follows:</p> <p>“The City Deal aims to support continued economic growth in the successful Greater Cambridge area. The City Deal document Executive Summary (page 1) says: ‘The Greater Cambridge City Deal aims to enable a new wave of innovation-led growth by investing in the infrastructure, housing and skills that will facilitate the continued growth of the Cambridge Phenomenon. It acknowledges the region’s strong track record of delivering growth and seeks to support those existing, and new, businesses in achieving their full potential.’ It says that the Deal will “accelerate delivery” of housing identified in the Local Plans.</p> <p>“As part of that objective, the City Deal will support delivery of the strategy set out in the Cambridge and South Cambridgeshire Local Plans through investment in transport infrastructure, housing delivery and skills. Likewise, the Cambridge and South Cambridgeshire Local Plans will support the City Deal commitments by speeding the delivery of new homes and jobs. Such action is consistent with a key objective of City Deal, namely the delivery of transport schemes necessary to support continued economic growth, including through improved network connectivity and by supporting the sustainable development strategy included in the submitted Cambridge and South Cambridgeshire Local Plans.</p> <p>“The City Deal document<sup>1</sup> recognises that Cambridge City Council and South Cambridgeshire District Council, along with Cambridgeshire County Council as the Transport Authority, “have worked closely together on new local plans and associated transport strategy and have aligned plan making processes to achieve the benefits of what amounts</p>
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	<p>to a single overarching development, infrastructure and delivery strategy for Cambridge” (City Deal document<sup>1</sup> page 7). Furthermore, as part of the City Deal arrangements, the Councils have agreed to prepare a joint Local Plan and Transport Strategy starting in 2019.</p> <p>“The City Deal has secured a commitment for up to a total of £500 million of Government funding. The £100 million that has already been secured as the first tranche of funding, is a large sum that has enabled studies to be commissioned and initial consultations held on major transport schemes and will thereafter fund these capital works.</p> <p>“The City Deal Executive Board has agreed a list of infrastructure schemes for delivery over its 15 year period, drawn from the Transport Strategy for Cambridge and South Cambridgeshire (January 2015). Amongst those included in the list are those schemes identified in the submitted Cambridge and South Cambridgeshire Local Plans as necessary to support the sustainable development strategy. This forms part of the City Deal commitment to accelerate the delivery of planned homes in accordance with the Local Plans.</p> <p>“On the basis of an assessment of a combination of positive economic impact and deliverability a number of schemes have been prioritised for Tranche 1 to be delivered in the first five years of the City Deal 2015-2020. Options have now been developed for all the Tranche 1 schemes. Tranche 1 includes those schemes that will facilitate the early delivery of development in the A428 corridor (including Cambourne West and Bourn Airfield). Indeed, the Tranche 1 schemes and implementation programme demonstrate the commitment of City Deal to fund and deliver transport schemes that will support the delivery of major developments identified in the Local Plans even where this may be in advance of, and help facilitate, the grant of planning permission for those developments.</p> <p>“It is expected that appropriate contributions towards the costs of the transport schemes that has already been incurred will be recovered subsequently from those developments, through the grant of planning permission and accompanying planning obligations.</p> <p>“It is recognised that the anticipated total cost of proposed schemes exceeds the sums identified through City Deal</p>
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	<p>funding for Tranche 1. However, City Deal funding is not the only anticipated source of funding for Tranche 1 schemes and other sources of funding for those schemes is expected. In particular, it is anticipated and expected that City Deal monies will be supplemented by funding from other sources, including section 106 contributions (as discussed below) and from the Growth Fund. £9 million has already been secured in principle from the Growth Fund towards public transport improvements in the A428 corridor. Growth Deal funding is secured via the Greater Cambridge Greater Peterborough Enterprise Partnership, which is also a City Deal partner, therefore demonstrating a joined up approach to infrastructure funding in the Greater Cambridge area.</p> <p>“Furthermore, in terms of additional funding for infrastructure schemes, appropriate developer contributions are of course expected from those strategic developments provided for in the Local Plans that require particular infrastructure schemes as part of their delivery. These will be sought by City Deal partners in their role as local and county planning authorities. Through the planning process, those promoting strategic developments will be required to make appropriate, proportionate and reasonable contributions to on and off site infrastructure, including transport infrastructure, and affordable housing, guided by development viability, so as to secure the delivery of new settlements that are sustainable. It is the intention that such developer contributions as are secured through the planning process will be added to the City Deal funding, which is directed to securing the delivery of the required infrastructure to meet the objectives of the Local Plans development strategy, including the objective of delivering a substantial amount of housing, including affordable housing, at the new settlements.</p> <p>“The City Deal partners are wholly committed to delivery of the infrastructure programme for the benefit of existing and future residents and businesses through the provision of an enhanced transport network that provides good quality connectivity between homes and jobs, including supporting and securing new development provided for in the Local Plans through the delivery of key infrastructure schemes.”</p> <p>The City Deal schemes include those intended to provide high quality public transport links from the major developments to Cambridge and destinations on the edge of Cambridge. This includes public transport improvements along the A428 corridor</p>
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	<p>and orbital links to the north and south – to the Science Park/CNFE to the north via existing and approved developments and to Cambridge Biomedical Centre to the south via a western orbital route already subject to consultation.</p> <p>On the A428 corridor, the busway scheme, prioritised for City Deal tranche 1 funding, has been explored through an Interim Report considering options, and subject to public consultation in November 2015. Results were reported back to the City Deal Executive Board on 3 March 2015<sup>3</sup>. A recommendation report to the Executive Board is intended to be submitted in September 2016 which will recommend an option(s) for further development and further consultation. The programme anticipates start of construction of the scheme east of Madingley Mulch in August 2018, for completion in 2020.</p> <p>Some representors have raised issues regarding transport infrastructure need to deliver growth anticipated in the first 5 years of the plan. The new settlements at Waterbeach and Bourn Airfield are included in the housing trajectory beyond that period. The housing trajectory includes only 200 dwellings at Cambourne West by 2021.</p> <p>The County Council recognises that there will be pressure to deliver development in the A428 corridor prior to implementation of the full City Deal proposals. The County Council has advised that it will therefore work with developers to identify what interim measures could be provided by this development to support early housing delivery. These interim measures will need to complement the wider corridor proposals, must not be abortive work, and are likely to include improved provision for cyclists, potentially seeking to address pinch points that impact upon bus journey times, and possibly localised highway works. Depending on what detailed assessment of these interim measures shows, and the rate at which development actually happens, there may be a need to accept some very short deterioration in travel conditions pending delivery of the larger scale corridor works. This will all be addressed in determining the current planning application at Camborne West, which is anticipated to be determined shortly, and the Inspectors will be advised of the outcome.</p> <p>The A10(N) corridor has not been included in the tranche 1 prioritisation. However, in recognition of the change in circumstances in relation to timing of development at Waterbeach new town and preparation of an Area Action Plan for Cambridge Northern Fringe East, an A10(N) Corridor Study has commenced</p>
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<sup>3</sup> Report to City Deal Board 3 March 2016  
[http://www.gccitydeal.co.uk/citydeal/download/downloads/id/180/executive\\_board\\_report.pdf](http://www.gccitydeal.co.uk/citydeal/download/downloads/id/180/executive_board_report.pdf)

	<p>which can inform prioritisation of future tranches. This is considering transport interventions on the corridor, and their phasing relative to growth. The study will be completed in summer 2016.</p> <p>Alongside this work, to inform the plan making process, Cambridge City and South Cambridgeshire District Councils commissioned consultants to prepare reports on the constraints and deliverability of transport schemes on the A10(N) Corridor (RD/MC/074) and the A428 corridor (RD/MC/073). This evidence has confirmed that there are no overriding constraints that would prevent the transport interventions being delivered. The exercise also did not identify any constraints that would result in abnormal costs not previously anticipated.</p> <p>One representor identifies risks associated with delivery of Highways England schemes on the A14 and A428. The A14 DCO examination result is anticipated in the spring. Highways England are fully committed and continue preparatory work, and subject to the decision still anticipate completion in 2020. An element of local funding towards the scheme has already been committed by the Local Authorities. At the Matter 4 hearing the Councils, together with the County Council, advised the Inspector that the A428 Caxton to Black Cat improvements are not considered essential to the delivery of the development strategy. The Government announced funding for the A428 Black Cat to Caxton dualling scheme in December 2014, and anticipates delivery late in the period 2015 to 2020. Highways England have commenced work on the project.</p> <p>With regard to the phasing of infrastructure to meet the needs of new settlements as they grow, the IDS 2015 identifies when infrastructure would be needed, this would need to be further explored and detailed through the Area Action Plan / planning application process, to ensure infrastructure is available when it is needed, reflecting policy SC/4 of the Submission South Cambridgeshire Local Plan. There is no evidence that bringing forward other sites would put the delivery of Northstowe, or further development at Cambourne at risk. However, as recommended by the IDS 2015, the Councils intend to commence a Utilities Forum, to assist the coordination of infrastructure delivery and support the delivery of the major developments.</p> <p>In order to ensure the Local Plans fully explain the reasons for the development strategy, it is proposed to add further text to the both plans, explaining the further work that was undertaken and the reasons for the approach taken to the strategy. This is proposed as a revision to Modification PM/SC/2/C for the South</p>
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	<p>Cambridgeshire Plan, and PM/CC/2/E for the Cambridge Plan.</p> <p><u>Viability</u></p> <p>The Councils have considered viability issues, during the plan making process and specifically to consider the impacts of the proposed modifications. The Cambridge and South Cambridgeshire Local Plans Viability Update (November 2015) (RD/MC/090) provides a strategic viability assessment appropriate to this stage of the planning process. The Viability Update informed the Infrastructure Delivery Study, which considered the delivery and funding of infrastructure.</p> <p>One representor considers that the Waterbeach new town has not been assessed in the Viability Update. However, the document clearly sets out its approach to this new settlement (section 2.5 and paragraphs 3.4.3 to 3.4.5) which is appropriate at this stage.</p> <p>One representor considers that alternative sites should have also been subject to viability assessment. There is no requirement on Local Planning Authorities, and it would be impracticable, to carry out detailed infrastructure and viability assessments of rejected strategies or sites.</p> <p>Each site will have factors that both positively and negatively influence the development values that may be achieved. The Councils' viability evidence has considered a range of locations, including sites in and on the edge of Cambridge (including land north of Cherry Hinton). The influence of higher house prices in Cambridge are evident in the non-strategic sites viability indications. It should be kept in mind, however, that house prices are not the only factor, so that land values, development costs and a wide range of variables are likely to come into play from site to site.</p> <p>One representor (65832) raises some technical issues regarding the methodology used in the Viability Report. Paragraph 2.5.4 of the report explains the approach used to calculate an indicative surplus for planning obligations in addition to affordable housing. The consultants ran the appraisal to produce a profit residual (sum remaining for profit), by fixing the land costs input. However, the aim was to assess what remained for s.106 once a certain level of profit had also been taken into account – to avoid circularity. So this was done by then entering s.106 costs into the appraisal iteratively until the profit adjusted to a manually calculated level. In the case of the example noted by the representor, that pre-determined level was approximately 17.1% of GDV (blended across the market and affordable homes). This was arrived at by taking the total market development value (GDV) for a phase and</p>
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multiplying that by 20% (representing the profit on the market development). Similarly the total affordable housing development value was multiplied by 6% (representing the profit on the affordable homes development from a phase). The sum of those two figures (two elements of profit added together i.e. the profit total) was then divided by the total GDV to get to a blended profit rate expressed as percentage of the total (combined) GDV – i.e. in this case 17.1%. In the Council's consultants' experience, a blended profit level in the order of 17% GDV is a reasonable assumption for the purpose. The consultants also note that in the example picked out by the representor, when viewed as a proportion of cost, the 17.1% GDV profit is equivalent to more than 20% (on cost) and so would exceed that as another form of profit benchmark that may be referred to. The 7% finance rate assumption applies to the smaller sites which Appendix I focusses on. The representor correctly notes that a 6.5% assumption has been used within the current stage strategic site appraisals. In both cases these are considered reasonably representative of the range of assumptions seen from experience in practice; those vary, with lower rates also potentially relevant.

With regard to the delivery of affordable housing, planning policies provide a degree of flexibility, allowing variations to the scale of affordable housing sought at a site specific stage, subject to viability. In certain specific circumstances, it may be appropriate and necessary to consider the balance of infrastructure funding across a range of issues to enable delivery. The point in the economic cycle may well also have a bearing, noting for example the pick-up in the market in the last few years. There is nothing unusual about this. The Councils note that there are fundamental potential changes to affordable housing being considered at a national level at present, all of which could alter viability equations – in some respects positively.

#### Sustainability Appraisal

The Sustainability Appraisal Addendum (SAA) appropriately considers a range of sites and strategy alternatives related to the development sequence, and provides information on the economic, social and environmental impacts of the different options, including comparisons of edge of Cambridge development with new settlements. The SAA sets out the reasons for the Councils' preferred approach, and the weighting of different sustainability issues. Assessments of different options were made against the same set of objectives and criteria. Assumptions regarding mitigation measures are clearly stated. The assessments considered the impact on heritage issues. It concludes that in combination with the submitted Sustainability Appraisals Reports the Local Plans are supported by a

	<p>comprehensive sustainability appraisal which meets the requirements of the SEA Regulations.</p> <p>Issues raised in representations to the current consultation regarding the Sustainability Appraisal Addendum (SAA) are considered in a separate schedule. The modification to reference the SA work in the Local Plans is sound.</p> <p><u>Alternative sites</u>  A number of representations to the Proposed Modifications consultation propose changes to the strategy to allocate alternative sites on the edge of Cambridge or at villages, and put forward specific sites. Many of these relate to representations made at the Proposed Submission consultation stage and are already before the examination. These have been considered through the plan making process, and subject to Sustainability Appraisal, and the Councils have provided reasons why they have not been included in submission Local Plans. Where there are significant variations to existing omission sites submitted in the new representations, for completeness these have been appraised and are included in the SAA.</p> <p><u>Response to Comments on Transport Evidence Base</u>  The Councils consider that the Transport evidence base is robust and transparent. It meets the requirements of National Planning Practice Guidance, and provides information to inform the Sustainability Appraisal.</p> <p>The Transport Report responds the Inspectors Letter (May 2015) by providing further information on the transport implications of different development strategy options, including comparisons of strategy options which include development on the edge of Cambridge, and sustainable transport options which can support new settlements.</p> <p><i>Testing Transport impacts of Strategy Options</i>  The testing of different scenarios in phase 2 looked at a range of strategy scenarios. This included development focused at a number of different broad locations around the edge of Cambridge as compared to developing at new settlement locations or in villages. The modelling was informed by developments proposed to the Councils through the plan making process, but it was not intended to compare exact quanta of development in the different scenarios, but to test the varying development strategy choices in so as to better understand the transport implications.</p> <p>As well as comparing the overall transport impacts of the different model runs, the transport impacts of new major developments</p>
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	<p>associated with each strategy were drawn out in paragraphs 5.58 to 5.69 of the Local Plan transport Report.</p> <p>The Councils consider that the modelling work appropriately considers the benefits and dis-benefits of developing in different areas around Cambridge and South Cambridgeshire, as well as the transport challenges of these developments. The evidence base is proportionate.</p> <p><i>Identifying the preferred strategy</i></p> <p>NPPF paragraph 30 requires Local Planning Authorities to support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. However, as recognised in government guidance including the wider NPPF, a range of economic, social and environmental issues must be considered through plan making. It does not require transport to be maximised above all other considerations.</p> <p>The Councils considered the Transport Report, alongside a range of other planning evidence and the Sustainability Appraisal, when considering the preferred development strategy. This is documented in the Development Strategy Update RD/MC/060 paragraphs 4.42 to 4.69), and the reasons for the preferred approach are also documented in section 9 of the Sustainability Appraisal Addendum 2015 RD/MC/020.</p> <p>The development strategy supported by the LTP / TSCSC offers significant benefits in terms of delivering sustainable travel both for planned and existing development. This was taken into account in deciding that exceptional circumstances to review the Green Belt to develop land where there would be significant harm to the purposes of the Green Belt do not exist. The Councils have considered the sustainability implications of further major development on the edge of Cambridge. The release of larger sites would cause significant harm and outweighs the benefits in terms of accessibility, and have not been included in the Local Plans.</p> <p>Across Greater Cambridge the modelling work shows transport issues of similar magnitude which need to be addressed under all the development scenarios. Whilst there are differences in site specific performance in terms of mode share, due to the level of committed development, overall differences in the impacts of different strategy choices are more limited (see Transport report paragraphs 5.49 to 5.57). The Councils recognise the benefits, in transport terms, of the development options on the edge of Cambridge. However, the Councils consider that the negative impact on the Green Belt outweighs these benefits. The focus on</p>
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	<p>new settlements will provide opportunities to further minimise traffic growth through the introduction of sustainable travel opportunities and internalisation of trips, and this will also bring wider benefits to other communities along the corridors.</p> <p>The Transport Strategy measures proposed have a beneficial impact on travel behaviour in the two districts. These measures directly cause non-car trips into Cambridge to grow at double the rate they would otherwise be expected to (26% compared with 13%). The growth in car trips into Cambridge is reduced by 11% in the AM peak. The measures have the added impact of reducing the total trips into Cambridge making the City more accessible overall. This clearly shows that the Transport Strategy improves trips by public transport, cycling and walking. The Councils do not consider the residual impacts of development to be severe.</p> <p>The Transport Strategy included in the Transport Strategy for Cambridge and South Cambridgeshire includes a range of measures to support walking, cycling, and public transport, as well as highway measures where appropriate. Park &amp; Ride forms an important element of the strategy. The recent fall in patronage at the park and rides follows the introduction of a charge to park at these sites. The County Council always anticipated a fall in patronage, and expects that user numbers will start to rise again once people are used to this charge.</p> <p>The Strategy does not simply reinforce existing transport patterns, but seeks to provide realistic alternatives to the car to benefit existing as well as new population. The transport strategy will enable businesses in Cambridge and South Cambridgeshire to continue to grow, and deliver the jobs anticipated by the local plans.</p> <p>The Transport Report appropriately considers the strategic measures needed to support growth, and testing using strategic modelling to support plan making. As detailed in the Infrastructure Delivery section of this response, further work is already underway to refine these measures, and address phasing issues in more detail.</p> <p>Transport measures considered through the Transport Report are already being prepared through the City Deal process, in order to help deliver the growth strategy. This includes measures on key transport corridors, and well as the City Centre Access Study, which will recommend transformative improvements affecting general vehicular traffic in the City.</p> <p><i>Technical Issues Regarding Transport Modelling</i></p>
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	<p>The Do Minimum runs look at the impact of the development without necessary infrastructure to mitigate the transport impacts. These runs show that additional infrastructure is necessary to support all development options that were considered. The 'Do Minimum' tests all have common supply side infrastructure, which does not include the 'Do Something' measures listed in the right-hand column of the table in B.3. of the Transport Report. Section B.2 lists measures which are common to the Do Something runs. It is acknowledged that the text at the start of section B.2 could be clarified by saying 'present in all Do Something modelling runs'. The Do Minimum runs included only committed transport upgrades.</p> <p>The modelling undertaken considers the potential mitigation measures that could be applied in the 'do-something model runs'. The schemes tested reflect the benefits that can be achieved through the City Deal Schemes at a strategic level appropriate to plan making. The assumptions used to undertake this modelling provide an appropriate indicator of the scheme benefits. The schemes will be refined as they are developed through the City Deal Web Tag process. For example, the 2015 A428 Corridor Study is an Options report includes a number of route options. The Councils are confident that the modelling work undertaken is a reasonable representation of proposed interventions in this corridor and that the modelling results support the preferred development strategy. While the potential final option to be introduced into this corridor is yet to be decided, options which included the single direction inbound priority measure schemes do not appear to significantly reduce the patronage of the scheme when modelled. The Councils are confident that the modelling work undertaken is a reasonable representation of proposed interventions in this corridor and that the modelling results support the preferred development strategy.</p> <p>In order to test alternative sites some assumptions had to be made, for all sites in respect, potential highway access points and accompanying infrastructure. The access and mitigation measures modelled in the phase 2 model runs are those determined by Local Transport Authority to be the likely appropriate measures. For sites of significant scale it would not be reasonable to assume negligible levels of highway access so assumptions had to be made at that time on potential access proposals.</p> <p>For South East Cambridge, it was determined that there would likely need to be access to the north in the vicinity of Yarrow Road and access to the south / west via Babraham Road. As a working assumption it also assumed that there would be some improved connectivity onwards towards the strategic highway network given</p>
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	<p>that access to the strategic road network from the site is currently not ideal. This is not seeking to undermine the site’s “sustainability benefits” but simply seeks to represent the likely need for improvements in highway capacity in that broad corridor given that such movements are unlikely to be catered for in significant numbers by sustainable transport options.</p> <p>Following the Do Minimum runs the Local Highways Authority advised, in consultation with the Transport consultants, the likely indicative transport mitigation measures necessary for the developments being tested. These were included in the Do Something runs. These are not considered arbitrary, but a reasonable response to the developments being modelled to appropriately consider the potential for mitigation. Of course, in practical terms, the details of these schemes might differ as details are worked up through subsequent planning application processes but the assumptions made are considered wholly reasonable for the purposes of modelling and plan-making at this stage.</p> <p>The assumptions when considering the modelling of sites were not made to promote car use; they were simply taken to recognise that some level of local highway investment might be required in order for the site to function reasonably in transport terms, across all modes of transport.</p> <p>A number of representors consider specific variations of model runs should be undertaken for their specific sites. The Councils are required to produce a reasonable and proportionate evidence base. Through the three phases of modelling, testing of alternatives and the preferred option, they have developed an appropriate evidence base to inform plan making. Running multiple additional model runs to test variations on individual omission sites would be disproportionate and impracticable. The Councils consider that aggregating sites for the purposes of scenario testing is wholly reasonable for the purposes of plan-making.</p> <p>A range of information is provided on the relative impacts of the various scenarios tested through the model runs, allowing appropriate comparison and information on their impacts.</p> <p>Some representors query the phase 3 model run, which tested the preferred approach, and whether it fully addressed the sites identified in Proposed Modifications. As the Transport Report states, this included site the increased development north of Cherry Hinton, and detailed the mitigation measures that were assumed in both the ‘do nothing’ and ‘do something’ model runs. The provisional allocation south of Cambridge Biomedical Campus</p>
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	<p>was not included in the updated transport modelling; the Councils will consider further transport modelling work to support this potential allocation should it be advanced further through the Local Plan process.</p> <p><i>Statement of Common Ground</i> Following Examination Matter 7 (Transport), the Councils met with the participants towards a statement of common ground. Participants were invited to indicate what additional information they felt they required regarding the transport modelling work undertaken. This was provided in the document - CSRМ Modelling Summary Report for Cambridge and South Cambridgeshire Local Plans Supplementary Technical Note, May 2015 (RD/MC/072).</p> <p>As a result of the Inspectors Letter (May 2015) the Councils commissioned additional transport modelling, published in November 2015 - Local Plans CSRМ Cambridge and South Cambridgeshire Local Plans Transport Report (RD/MC/070). Being aware of the particular requests of the Mater 7 participants, an additional report was published at the same time which provided from the new model runs the information previously requested - CSRМ Technical Modelling Report for Cambridge and South Cambridgeshire Local Plans Supplementary Technical Note, November 2015 (RD/MC/071).</p> <p>The Councils have cooperated by providing additional information required to enable statements of common ground to be prepared, and work on statements of common ground will continue. The Councils have endeavoured to provide as much information as possible to participants to the extent that is practicable and proportionate to do so. The Councils remains committed to agreeing common ground with other participants where those participants themselves are also similarly committed to that process.</p> <p><u>Note:</u> Removal of phasing restrictions on Waterbeach and Bourn Airfield are addressed under modification PM/SC/2/R.</p>
<b>Approach to Proposed Modification</b>	No change. Submit proposed modification PM/CC/2/D to the Examination Inspectors.

<b>Proposed Modification: PM/CC/2/E</b> <b>After paragraph 2.30</b>			
<b>Representations Received</b>	Support: 12	Object: 15	Total: 27
<b>Main Issues</b>	<p><b><u>General Issues:</u></b></p> <p><b><i>Supports:</i></b></p>		

	<ul style="list-style-type: none"> <li>• <b>Historic England:</b> <ul style="list-style-type: none"> <li>➤ welcomes the preparation of the 2015 Green Belt study, which we believe provides the necessary evidence base to underpin the decisions made in respect of further release of Green Belt land;</li> <li>➤ supports the methodology adopted in this study;</li> <li>➤ agrees with the main findings set out in paragraph 0.4.2 of the study;</li> <li>➤ notes that the methodology used by the consultants in their study is different to that used by the Councils, but they come to broadly similar conclusions;</li> <li>➤ confirms that there is nothing in the proposed Major Modifications or the LDA Inner Green Belt Study that would undermine their previously agreed Statement of Common Ground concerning the Green Belt. They would be happy to participate in any update to the Statement of Common Ground.</li> </ul> </li> <li>• There should be no further releases from the Green Belt. It is vital that this is retained to preserve the setting of the historic city.</li> <li>• Strongly agree with the Council's assertion that beyond locations already identified, further development cannot be accommodated without substantial harm to Green Belt purposes.</li> <li>• Supports the conclusion that it is unlikely any additional development could be accommodated on the edge of the city without substantial harm to Green Belt purposes, with particular reference to the remaining Green Belt to the south west and south of Trumpington, where additional development would have undermined the purposes of the Green Belt.</li> <li>• Supports the assessment of the Green Belt which confirms the need to continue to protect the Green Belt.</li> <li>• <b>Cambridge Past, Present and Future</b> raised substantive concerns about the previous inner Green Belt review on the grounds that the assessment criteria did not conform to the NPPF, the lack of transparency, and poor consistency in the outcome. The 2015 study effectively answers these concerns and provides a sound basis for spatial planning of the housing requirement for Greater Cambridge.</li> </ul> <p><b>Objections:</b></p> <ul style="list-style-type: none"> <li>• The Green Belt is the over-arching principle guiding the development strategy of the Local Plans, with the delivery of sustainable development having only a secondary role which is an approach that is contrary to the National Planning Policy Framework (NPPF).</li> <li>• The Green Belt has been incorrectly treated as a near absolute constraint, when it is a planning policy tool which can and</li> </ul>
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	<p>should be varied to meet development needs.</p> <ul style="list-style-type: none"> <li>• A proper assessment of safeguarded land has not been undertaken, and none of the Green Belt studies including the Inner Green Belt Review 2015 have considered this matter. Land at Cambridge East has been identified as safeguarded land without any assessment as to whether it will be available for development after 2031. Furthermore, no additional or alternative land has been considered or assessed as potential safeguarded land for housing or employment. If sufficient land has not been identified to meet development needs, proposed Green Belt boundaries will need to be altered at the end of the plan period.</li> <li>• This implies the Green Belt designation around Cambridge must be respected but villages such as Waterbeach have not had the benefit of additional green belt designation being considered. Open space between the village and the proposed development site has now been given planning permission/is being built on which makes it essential that additional land is designated as Green Belt to give the existing village some protection and not just to provide restraint in the Denny Abbey vicinity.</li> <li>• In order to respond to the Inspectors' questions the authors of the review would have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so by adding additional assessment criteria, assessing the relative benefits of all criteria and areas of Green Belt, estimating the cost of Green Belt loss against new settlement creation (cost-benefit analysis), and analysing the adverse impacts of new settlement creation in terms of transport and infrastructure'.</li> <li>• The new evidence and Main Modifications fail to properly address the Inspector's' concerns of the original work related to the review of the Inner Green Belt Boundary (2012), in particular the clarity of the Green Belt Review methodology, and the role of the Sustainability Appraisal/Strategic Environmental Assessment process.</li> </ul> <p><b><u>Objections regarding the methodological approach to the 2015 Green Belt Study:</u></b></p> <p><b>Green Belt Qualities and Purposes</b></p> <ul style="list-style-type: none"> <li>• The qualities selected for the Assessment Criteria do not cascade from current adopted policies and are not supported by full justification for inclusion. In addition the link between the qualities assessed and the Green Belt purposes in many cases are tenuous and indirect.</li> <li>• Accordingly the assessment falls short of being able to draw conclusions on Green Belt and potential Green Belt effects and</li> </ul>
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	<p>appears to be more of a landscape appraisal / assessment of key landscape and environmental characteristics.</p> <ul style="list-style-type: none"> <li>• The 2012 and 2015 studies suffer from an incorrect interpretation and analysis of some of the criteria against the purposes of Green Belt and the weighting given to the criteria.</li> </ul> <p><b>Measurable Thresholds</b></p> <ul style="list-style-type: none"> <li>• There is a lack of measurable thresholds and criteria which would allow for the process to be replicated and verified by other appropriately qualified professionals.</li> <li>• The reasons set out for not applying a scoring system are not considered adequate. The descriptive criteria could have been developed to enable a scoring system to be developed. A scoring system would have provided a more transparent way of identifying the relative importance of Sectors and sites to the Green Belt and their suitability to meet the present or future development needs of Cambridge.</li> </ul> <p><b>Assessment Parcels</b></p> <ul style="list-style-type: none"> <li>• The use of large and inconsistent assessment parcels in undertaking this exercise has resulted in an assessment with different findings than if smaller parcels had been used.</li> </ul> <p><b><u>Objections regarding specific sectors within the 2015 Green Belt Study:</u></b></p> <p><u>Note:</u> Only relevant sectors are referred to within this modification For other sectors, see modifications PM/SC/2/C and PM/SC/8/C.</p> <p><b>Sectors 3 and 4: North of Barton Road and South of Barton Road</b></p> <ul style="list-style-type: none"> <li>• Grange Farm (identified as Site CC916 in the Sustainability Appraisal Addendum) is located to the west of Cambridge, immediately south of the West Cambridge development site. <b>St John’s College’s</b> vision for the site is that residential development will be on the eastern portion of the site, whilst part of the western area will provide scope for structural landscaping. Development of the eastern portion of the site is considered to have limited impact on the key purposes of the Green Belt and as such it is considered suitable for residential allocation.</li> <li>• <b>St John’s College</b> owns a 0.6 hectare site which is triangular in shape and lies on the southern edge of Wilberforce Road to the south of Stacey Lane.(referred to as “Meadow Triangle” within Appendix 1 Site U4 of the Issues and Options 2, Part 2 Document). The land’s inclusion within the Green Belt is an anachronism having regard to the function and character of the surrounding area.</li> </ul>
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	<ul style="list-style-type: none"> <li>The methodology adopted in the Inner Green Belt Review 2015 is not robust because of a bias on the issue of setting and an exaggeration of ‘unspoilt’ views from the west towards the historic core of the City. Land to the North of Barton Road should be released from the Green Belt, and allocated as a strategic housing site and land South of Barton Road should be released from the Green Belt and safeguarded to meet development needs beyond the plan period.</li> </ul> <p><b>Sector 7: South west of Trumpington</b></p> <ul style="list-style-type: none"> <li>The Green Belt Study is not an appropriate evidence base and does not overcome issues identified at the EiP. As part of reviewing the Green Belt Study, a number of concerns relating to the methodology have been determined that skew the results for Sector 7 (around Trumpington Meadows). The assessment of Sector 7 is not appropriate.</li> </ul> <p><b>Sector 10: South of Addenbrooke’s</b></p> <p><u>Note:</u> for other non-Green Belt issues on Sector 10 see modification PM/SC/8/A.</p> <ul style="list-style-type: none"> <li>Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt.</li> </ul> <p><b>Sectors 11, 12 and 13: West of Limekiln Road, South East Cambridge, and South of Fulbourn</b></p> <p><u>Note:</u> Deletion of GB1 and GB2 is addressed under modification PM/CC/2/G.</p> <p><u>Note:</u> Policy E/2 Fulbourn Road East is addressed under modification PM/SC/8/C.</p> <p><b>Inclusion of Newbury Farm in GB2</b></p> <ul style="list-style-type: none"> <li><b>Cambridgeshire County Council</b> wishes to include the 0.9ha farmstead at Newbury Farm in masterplanning exercise for GB1 and GB2 so farmstead may, when available, be fully integrated into development.</li> </ul> <p><b>Significant expansion of GB1 and GB2</b></p> <ul style="list-style-type: none"> <li><b>CEG</b> Failure to interpret the Green Belt Review correctly such that the Green Belt boundaries proposed for GB1 and GB2 are not supported by the evidence base. Within the parameters of the Council’s own assessment, the two allocations could be extended eastwards to provide a sustainable urban extension of 1,260 new homes with extensive community facilities – this would be in line with the Plans’ development sequence without</li> </ul>
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	<p>giving rise to harm to the Green Belt as defined by the Councils' new Green Belt review. Such an increase could either help meet an increase in the housing requirement and/or replace a less sustainable form of development lower down the development sequence.</p> <ul style="list-style-type: none"> <li>• Land to the north of Babraham Road, west of Cherry Hinton Road/Limekiln Road and south of Worts' Causeway is released from the Green Belt and identified as a strategic site allocation.</li> </ul> <p><b>Safeguarding of land put forward by CEG</b></p> <ul style="list-style-type: none"> <li>• Need for the modification of the Green Belt to identify safeguarded land elsewhere within land at South East Cambridge to ensure that the Green Belt boundaries are secure beyond the Plan Period.</li> </ul> <p><b>Sectors 18 and 19: Eastern Side of Fen Ditton and West of Fen Ditton</b></p> <ul style="list-style-type: none"> <li>• Disagreement with the assessment of Sectors 18 and 19 within the Green Belt Study in relation the level of Green Belt importance attached to the land promoted by <b>The Quy Estate</b>. It is a broad brush judgement that states for both Sectors 18 and 19, that is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes. It does not state which Green Belt purpose or purposes it alleges is compromised or affected as there is no Purposes assessment. It does not state whether "substantial harm" is caused by an effect on one Green Belt Purpose (if so which Purpose), more than one Purpose or perceived effects on all the Purposes. It does not state what is meant by "substantial harm".</li> </ul>
<p><b>Councils' Response</b></p>	<p><b><u>General Issues</u></b></p> <p><b><i>Supports:</i></b> Support noted. The Councils will consider whether any amendments are required to their Statement of Common Ground with Historic England.</p> <p><b><i>Objections:</i></b> <b>Green Belt treated as an absolute constraint</b> The Councils have not treated Green Belt as an absolute constraint. The specification for the LDA Design Study expressly excluded the assessment of Green Belt in the context of NPPF paragraph 85 and how Green Belt is addressed in the SA/SEA process in response to NPPF paragraph 84. This is referenced at paragraph 2.6 of the Councils' specification for the Inner Green Belt Boundary Study as provided in the Councils' letter of 28 September 2015 to the Inspectors. The LDA Design Study therefore does not address these issues. The Councils have taken</p>

	<p>the LDA Design Study and weighed it alongside other evidence and technical reports to reach conclusions as to their development strategy (see Part 3 of the Councils' Development Strategy Update (RD/MC/060)).</p> <p>The Study forms part of a wider evidence base that when taken together responds to the requirements of paragraphs 84 and 85 of the NPPF to take account of sustainable patterns of development and informed decision making. This includes a Sustainable Development Strategy Review, transport modelling and SHLAAs, which themselves informed comprehensive Sustainability Appraisals as an iterative process throughout plan-making. The Councils have also undertaken further Sustainability Appraisal work to address the issues raised in the Inspectors' letter of 20 May 2015.</p> <p>The NPPF at paragraph 84 requires that promoting sustainable patterns of development and considering the consequences for sustainable development of channelling development to locations outside the Green Belt should be "taken into account" when reviewing Green Belt boundaries. It is not an overriding consideration. Neither should sustainability be understood only to refer to movement and access matters. The NPPF is clear that there are three dimensions to sustainable development: economic, social and environmental (paragraph 7), and in paragraph 6 states that the NPPF policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view on what sustainable development means in practice for the planning system. These policies include: paragraph 30 which gives encouragement to sustainable transport solutions to reduce greenhouse gas emissions and in the preparation of Local Plans, local planning authorities are told to support "a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport", and include the policies dealing directly with the Green Belt in paragraphs 79 to 92. Green Belt protection is clearly part of the Government's policy to deliver sustainable development, as is the release of Green Belt land for development through Local Plan preparation where appropriate to do so.</p> <p>The development strategy policies of the Local Plans<sup>58</sup> provide for a sustainable pattern of development with the majority of development focused in and on the edge of Cambridge as the first and second preferences. The spatial strategy and the appropriate balance between Green Belt and other sustainability factors were considered in the Councils' Matter 2 statement. The sustainability merits of all proposed development sites including those adjoining the inner Green Belt boundary have been assessed and have been properly taken into account in reaching a view on the</p>
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appropriate balance between protecting Green Belt and delivering new homes and jobs at the top of the development sequence.

Note: also refer to the assessment at PM/CC/2/D.

### **Safeguarded Land**

The issue of safeguarding / permanence has already been considered at the Matter 6iii Local Plan hearings in 2015.

This is a matter that arises under NPPF paragraph 85 and is therefore outside the scope of the LDA Design Study.

The inner Green Belt boundary has been heavily scrutinised since 2000, and very significant Green Belt releases made between 2006 and 2010. These are sufficient in total to accommodate 22,000 new homes, the long term growth of Cambridge University and the creation of what will be a world class Biomedical Research Park at Addenbrooke's (Cambridge University Hospitals). Apart from some small scale non-strategic sites proposed for release as part of the current Local Plans, all of the major sites which could be developed without significant harm to Green Belt purposes in the foreseeable future have already been released for development. On this basis there is no scope for any future strategic Green Belt releases unless significant harm to the Green Belt purposes was to be accepted which would not be consistent with policy or the conclusions of the development strategy review.

Extensive land at Cambridge East is safeguarded for longer-term development after 2031. This site was removed from the Green Belt between 2006 (Cambridge Local Plan) and 2008 (Cambridge East AAP) when it was envisaged that Cambridge Airport would relocate and a major new urban quarter would be created. The relocation of the airport is now not expected within the plan period. It is a developable site with the benefit of an adopted AAP. It is flat, and is not at risk of flooding. Neither the NPPF nor the NPPG require safeguarded land to be deliverable. This area would provide a good location for sustainable development if it came available at some point in the future. As noted in our Matter 6A i statement, the remaining safeguarded land has a capacity of between 8,000 and 10,000 homes based upon the assumptions in the adopted Cambridge East AAP.

### **Green Belt expansion around Waterbeach**

Whilst the level of development proposed and/or permitted at Waterbeach is acknowledged, additional Green Belt designation is not considered appropriate in this instance. The emerging South Cambridgeshire Local Plan sought to protect land between the

village and new town as Green Belt. This will be a matter for the site specific hearing into the new town, in light of subsequent permissions for residential development. The further expansion of Waterbeach to the west, east and north is restricted by flood risk and the proximity of Denny Abbey to the settlement. Land to the south is already Green Belt.

**Cost-Benefit Analysis of Green Belt**

The Councils consider that the findings of the LDA Design Study have been considered together with other evidence base documents, including the Councils' updated Sustainability Appraisal Addendum. The Sustainability Appraisal Addendum identifies the impacts of the different strategy choices. Informed by this, the Councils have identified the preferred approach and the reasons for this approach.

**Failure to address Inspectors' concerns**

The Councils consider that the new Green Belt Study and the Sustainability Appraisal address the Inspectors' concerns as expressed in their letter of 20 May 2015.

**Objections regarding the methodological approach to the 2015 Green Belt Study:**

**Green Belt Qualities and Purposes**

As noted at paragraph 2.2.7 of the LDA Design Study, the development of the Cambridge Green Belt purposes is described in Appendix 6 to the Councils' Joint Matter Statement on Matter 6. The Matter Statement refers to paragraph 8.10 of the Structure Plan EiP Panel Report, which states that 'in the case of Cambridge it only has a Green Belt because it is a historic city. It follows that all five purposes of Green Belts as set out in paragraph 1.5 of PPG2 are not necessarily relevant to this Green Belt.' The EiP Panel endorsed the Cambridge Green Belt purposes, which were stated in the Structure Plan and primarily relate to the character and setting of Cambridge and preventing the merging of settlements and thus focus particularly on only two of the five National Green Belt purposes. In relation to National Green Belt purpose 4 (setting and special character), the PAS Green Belt document (Planning on the Doorstep: The Big Issues – Green Belt, 2014) states 'This purpose is generally accepted as relating to very few settlements in practice', confirming that the Cambridge Green Belt differs from most other Green Belts in this respect.

It is therefore clear that it is not necessary for land within Green Belt to perform all five of the Green Belt purposes laid down in NPPF paragraph 80. In turn, it follows that the importance of a particular area of land to Green Belt is not determined by the

	<p>number of Green Belt purposes it performs. Methodologies that assess areas of land against a range of Green Belt purposes and rank land according to how many purposes it performs are therefore flawed. Since Cambridge 'only has a Green Belt because it is a historic city' (Structure Plan EiP Panel Report paragraph 8.10 as above), an area of land that plays a key role in relation to the setting of Cambridge could be highly important to retain as Green Belt even if it performed no other Green Belt purpose.</p> <p>Green Belt purposes are concerned with concepts that are somewhat esoteric or abstract, such as 'unrestricted sprawl', 'encroachment', 'setting' and 'special character'. It is not possible to make any meaningful assessment against the purposes without first defining what is meant by these terms and specifically identifying the particular qualities of Cambridge and its surrounding landscape that contribute to the performance of Green Belt purposes. The LDA Design Study did this in two ways:</p> <ol style="list-style-type: none"> <li>1. Reviewing the qualities that had been identified in previous studies and policy documents (section 2.3 of the LDA Study)</li> <li>2. Undertaking extensive baseline studies and analysis as described in section 4.0 of the LDA Study and summarised in section 4.15.</li> </ol> <p>In these two ways, the 16 qualities used as criteria for the assessment were identified. The 16 qualities are described fully in section 5.2 of the report. The first paragraph of the description of each quality explains the relevance of the quality by reference to Green Belt purposes and qualities identified in previous studies and policy documents. Each of the qualities is therefore clearly founded in Green Belt purposes and the summary table on pages 59-60 shows that all 16 qualities have a relationship to at least one of the National Green Belt purposes and all qualities except no. 10 have a relationship to at least one of the Cambridge Green Belt purposes. Conversely, at least two qualities are identified as being relevant to each of the National Green Belt purposes and Cambridge Green Belt purposes.</p> <p>Some of the Representations from objectors argue that because the number of qualities relevant to each Green Belt purpose varies, there is an inherent bias in the LDA Design Study (see for example, CSA Environmental paragraph 2.16 and The Landscape Partnership paragraph 4.31). This is not the case because the LDA Design Study does not assess the importance of areas of land by virtue of the number of Green Belt purposes they perform or the number of qualities they exhibit. For the same reason, the fact that some qualities relate to more than one purpose does not mean there is any double counting in the assessment.</p>
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With the exception of National Green Belt purpose 5, the LDA Design Study takes full account of all National Green Belt purposes and Cambridge Green Belt purposes. National Green Belt purpose 5 was scoped out, as described at paragraph 2.2.5 of the LDA Design Study. The PAS Green Belt document (Planning on the Doorstep: The Big Issues – Green Belt, 2014) confirms the validity of scoping out National Green Belt purpose 5, stating ‘If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose’. The LDA Design Study’s compliance with PAS advice is raised in the Representation by Grosvenor. The criticism appears to be that the LDA Design Study does not assess land parcels against specific Green Belt purposes. The text within the PAS document on which Grosvenor relies states ‘*Any review of Green Belt boundaries should involve an assessment of how the land still contributes to the five purposes ...*’. The LDA Study assesses the performance of land parcels against Green Belt purposes by means of the 16 qualities. There is no suggestion in the PAS guidance that the LDA Design approach is invalid.

#### **Measurable Thresholds**

It is not necessary for land within Green Belt to perform all five of the Green Belt purposes laid down in NPPF para 80. In turn, it follows that the importance of a particular area of land to Green Belt is not determined by the number of Green Belt purposes it performs. Methodologies that assess areas of land against a range of Green Belt purposes and rank land according to how many purposes it performs are therefore flawed. Since Cambridge ‘only has a Green Belt because it is a historic city’ (Structure Plan EiP Panel Report paragraph 8.10 as above), an area of land that plays a key role in relation to the setting of Cambridge could be highly important to retain as Green Belt even if it performed no other Green Belt purpose. Scoring land parcels on the basis of the number of Green Belt purposes they perform or the number of qualities they exhibit is a flawed approach.

At the end of each sector assessment in the LDA Study, under the heading ‘Importance of the Sector to Green Belt Purposes’ the Study identifies the qualities which are most relevant to the sector and sub-areas, on which the assessment of importance is primarily based. In most cases, one or two particular qualities are of most relevance but the qualities differ from one sector to another. For example, particular qualities in sector 3 are the presence of open countryside close to the city centre, ensuring that the city remains compact and that the historic core remains large in comparison to the size of the city as a whole. In sectors in the south-east of the

city, topography is of particular relevance, with the Gog Magog Hills forming a key component of the setting of the city and their foothills forming the backdrop in views out from and across Cambridge. In various other sectors, Green Belt land plays a key role in maintaining separation between Cambridge and the necklace villages.

In each of the above examples, land in the sectors is important to Green Belt purposes primarily because of the qualities stated. However, it is not possible to compare the importance of one quality on one side of the city with another quality on another side of the city. Any such comparison, or any weighting of criteria to enable such a comparison, would be entirely subjective. The intention in the LDA Design Study was to take an objective approach. In analysing the complex issues raised by Green Belt purposes, baseline information must be assessed and professional judgement must be exercised to arrive at robust and justifiable conclusions which can be relied on to inform the Local Plan process. The need for professional judgement cannot be avoided and does not mean that the assessments are subjective in the sense that they are merely one person's opinion and another person might have a different opinion. In the case of professional judgement, another experienced professional applying the same methodology could be expected to reach similar conclusions.

**Assessment Parcels**

The main criticism raised by objectors in relation to land parcels relates to the size of sub-areas used for the assessment. The issues raised by Green Belt purposes and by the 16 qualities identified in the LDA Design Study are broad scale issues that are most appropriately considered in relation to areas of land at a relatively broad scale. Where an area of land forms a particular role in relation to the setting of the city, that role is very unlikely to stop abruptly, for example at a field boundary, so that one field can be assessed as performing the role in question and the next field can be assessed as not performing it. Rather, the performance of the role is likely to gradually increase or reduce across an area of landscape, with no clear boundary where the role starts to be performed. Assessing larger parcels of land enables this transition to be noted and taken into account. Dividing land into smaller parcels, particularly when associated with a scoring system that ranks parcels in relation to the number of Green Belt purposes or criteria they meet can lead to a suggestion that certain parcels are of lesser importance to Green Belt purposes and should therefore be released for development. However, such a fine-grained approach does not allow for any assessment of the effects of the development of one land parcel on adjacent parcels, which might be diminished in terms of their performance of Green Belt. The



	<p>effects of the release of a small parcel of land for development can therefore be greater than the loss of that parcel's contribution to Green Belt purposes.</p> <p>The approach taken in the LDA Design Study of assessing broader parcels of land which are consistent in land use, character and context enables such broader effects to be taken into account in considering the implications of the release of land from Green Belt for development.</p> <p>Some of the Representations criticise the classification of Townscape and Landscape Role and Function in certain locations, e.g. the Landscape Partnership para 4.29, which suggests that the University's West Cambridge site should be classified as Supportive rather than Distinctive. The justification for LDA Design's classification of West Cambridge is at para 4.14.12 of the LDA Design Study.</p> <p>At para 3.3 of the Pigeon report, it is suggested that the LDA Design Role and Function classification is a quasi-scoring system. This is not correct. The classification (known as the Winchester Methodology) is a method of identifying areas of townscape and landscape that play a greater or lesser role in defining or supporting the distinctiveness of a historic city and its setting. If taken on its own, it could be used as a crude scoring system (Distinctive areas being more 'important' than Supportive areas) but the LDA Design Study does not use it in this way. Rather, the classification is one of the qualities used to enable the assessment of the performance of areas of Green Belt.</p> <p>Some representations from interested parties suggested that, in considering the implications of Green Belt release for development in each sector, the Study only considered development of the entire sector or sub area in question and did not consider development in only part of a sector or sub area. This was not the case, as evidenced by the identification of the potential to release land for development in parts of certain sub areas, for example in sectors 10-13. However, the use of the word 'remove' in some instances may have given a misleading impression. Amendments are proposed to relevant paragraphs of the Study to improve clarity within the Supplement to the LDA Design Study (RD/MC/031).</p> <p><b><u>Objections regarding specific sectors within the 2015 Green Belt Study:</u></b></p> <p><b>Sectors 3 and 4: North of Barton Road and South of Barton Road</b></p> <p>The Grange Farm site is located across parts of sub areas 3.1 and</p>
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	<p>3.3 of sector 3, as identified in the LDA Design Study. Sector 3 is considered in detail in section 6.6 of the LDA Design Study, which confirms that the whole of sector 3 is important to Green Belt purposes. If land within the eastern parts of these sub areas were to be released for development, it would damage the characteristic setting of the city, diminish (both in reality and in perception) the presence of countryside close to the distinctive core of Cambridge and obstruct key views.</p> <p>The Wilberforce Road site falls within sub area 3.3, as identified in the LDA Design Study. Sector 3 is considered in detail in section 6.6 of the LDA Design Study. Paragraph 6.6.5 of the LDA Design Study considers the implications of Green Belt release for development within Sector 3, stating that within sub area 3.3 <i>“development would impact on the relationship with the Distinctive townscape within the West Cambridge Conservation Area and would remove the closest area of countryside from the historic core”</i>. Whilst the assessment of sub area 3.3 acknowledges that it has a greater level of enclosure than the wider sector and that it does not relate to any of the approaches to Cambridge that are of citywide importance, the relationship of sub area 3.3 to Distinctive townscape and the well treed Grange Road area, as well as the proximity to the historic core, are drawn out as important criteria that fulfil Green Belt purposes. As concluded in the LDA Design Study, no Green Belt release should be contemplated in this sector.</p> <p>As set out in response to other representations, National Green Belt purpose 4, to preserve the setting and special character of historic towns, is of particular relevance to Cambridge. It is unsurprising and entirely justified that the majority of the qualities identified in section 5.0 of the LDA Design Study relate to setting and character (although many of them also relate to other purposes). There is no inherent bias in the LDA Design Study as a result of the number of qualities relevant to each Green Belt purpose varying, because the LDA Design Study does not assess the importance of areas of land by virtue of the number of Green Belt purposes they perform or the number of qualities they exhibit. For the same reason, the fact that some qualities relate to more than one purpose does not mean there is any double-counting in the assessment.</p> <p>In terms of the alleged ‘exaggeration of unspoilt views’ from the west, there is no suggestion in the LDA Design Study that the construction of the M11 and other modern development has not changed these views. However, paragraph 5.2.32 of the LDA Design Study states that, because development has been limited on the west side of the city, the quality of views of that side of the</p>
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	<p>historic city, with open countryside and a soft green edge, and landmark historic buildings clearly visible and largely unaffected by modern development, has remained substantially intact over the last 300 years.</p> <p>The explanation for identifying no potential for release of land from the Green Belt in sector 3 is given at paragraph 6.6.5 of the LDA Design Study. Any development would remove the characteristic setting of the city, diminish (both in reality and in perception) the presence of countryside close to the distinctive core of Cambridge and obstruct key views.</p> <p>The explanation for identifying no potential for release of land from the Green Belt in sector 4 is given at paragraph 6.7.5 of the LDA Design Study. Any development on land South of Barton Road would severely compromise the separation between Cambridge and Grantchester, and would both remove the characteristic setting of the city and obstruct key views.</p> <p><b>Sector 7: South west of Trumpington</b></p> <p>As stated at paragraph 6.10.2 of the Study, the whole sector is currently in a state of change due to the new residential development at Trumpington Meadows. Within the Study, sector 7 is treated as a single area, due to the similar contribution to Green Belt purposes across different land uses within the sector. However, as there are some slight differences between the area laid out as a country park and that returned to agricultural use, it is proposed to divide the sector into two sub areas. Amendments to Figure 2 to show the extent of the sub-areas and to the text within the assessment of sector 7 are provided in the Supplement to the LDA Design Study (RD/MC/031).</p> <p>Justification of the classification of land within sector 7 as Supportive landscape is provided at criterion 8 of the assessment table on page 112 of the LDA Design Study. The objection by Grosvenor suggests that there is a contradiction within the assessment of sector 7, whereby the conclusions indicate the sector is important to the character of the approach to Cambridge, but the assessment under criterion 3 states that there is little contribution to the approach to the historic core. This is a misunderstanding, as the approach to the historic core is not coincidental with the approach to the city as a whole in the vicinity of sector 7.</p> <p>The objection queries the conclusion of the assessment of sector 7 that it ensures the expansion of the city does not continue unchecked and that the historic core remains large in comparison to the size of the city. The assessment of criteria 1, 2 and 3 in</p>
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particular address why this important for sector 7, with development to the south west of the city historically having been relatively limited, unlike other areas referenced by Grosvenor.

In relation to the assessment of criterion 12, the assessment is factual in that sector 7 forms part of the physical separation between Cambridge and the villages of Grantchester and Hauxton. The development at Trumpington Meadows, Glebe Farm and Clay Farm has extended the edge of Cambridge since many of the previous studies. The reference to separation between the M11 and the edge of the city within the LDA Design Study relates to the setting of the city, rather than relating to the prevention of settlements merging.

### **Sector 10: South of Addenbrooke's**

Note: for other non-Green Belt issues on Sector 10 see modification PM/SC/8/A.

Para 6.13.3 of the LDA Design Study confirms that the whole of sector 10 is important to Green Belt purposes, particularly in relation to the setting of the south of Cambridge, the prevention of urban sprawl and the prevention of coalescence between Cambridge and Great Shelford. Nevertheless, limited development in the northern and eastern parts of the sector could be undertaken without significant long-term harm to Green Belt purposes. Para 6.13.5 of the LDA Study provides the explanation for this and sets out parameters for any such development.

### **Sectors 11, 12 and 13: West of Limekiln Road, South East Cambridge, and South of Fulbourn**

Note: Deletion of GB1 and GB2 is addressed under modification PM/CC/2/G.

Note: Policy E/2 Fulbourn Road East is addressed under modification PM/SC/8/C.

### **Inclusion of Newbury Farm in GB2**

The inclusion of the existing farm buildings, farmyard and curtilage on Babraham Road would be entirely consistent with LDA Design's parameters for a Green Belt release in sub area 11.2. This modification is considered appropriate and inclusion of Newbury Farm within the allocation for GB2 is proposed. See modifications PM/CC/B/B and PM/CC/Policies Map/B for GB2 proposed below.

### **Significant expansion of GB1 and GB2**

The representation made on behalf of CEG in relation to land at

	<p>South East Cambridge seeks to apply the parameters for Green Belt release set out in relation to sector 11 to justify the release of a significantly greater extent of land than is proposed by Cambridge City Council's proposed allocations GB1 and GB2. The City Council's proposed allocations reflect a correct interpretation of the parameters whilst CEG's interpretation is incorrect. Whilst it is believed the parameters in the Study are clear, they have been reviewed in the light of CEG's misinterpretation and the amendments are proposed in the Supplement to the LDA Design Study (RD/MC/031) to add greater clarity.</p> <p><b>Safeguarding of land put forward by CEG</b>  The land within the South East Cambridge development proposal should not be released from the Cambridge Green Belt for allocation or as safeguarded land as this area plays a key role in the setting of the south east of Cambridge. The importance of sectors 11, 12 and 13 to the Green Belt purposes are addressed within the LDA Design Study.</p> <p><b>Sectors 18 and 19: Eastern Side of Fen Ditton and West of Fen Ditton</b>  The LDA Design Study states, in the case of sectors 18 and 19, that <i>"it is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes"</i> where the assessment process has not identified any locations within the sector that could accommodate development. Clarification is then provided for each sub area as to why development would not be acceptable. In locations where parts of a sector or sub area have been identified that could accommodate development, such as in sectors 8, 10, 11, 12 and 13, parameters are provided that would avoid significant harm.</p> <p>The links between the 16 qualities used as criteria for the assessment and the National and Cambridge Green Belt purposes are described fully in section 5.2 of the LDA Design Study, along with the summary table on pages 59-60. For each sector, and where applicable sub area, under the heading 'Importance of the Sector to Green Belt Purposes' the Study identifies the qualities which are most relevant to the sector and sub areas, on which the assessment of importance is primarily based. These can then be related back to the National and Cambridge Green Belt purposes. Furthermore, the importance of a particular area of land to Green Belt is not determined by the number of Green Belt purposes it performs.</p> <p><b>Development Strategy</b>  As set out in the Councils' assessment under modification PM/CC/2/D, in order to ensure the Local Plans fully explain the</p>
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	<p>reasons for the development strategy, it is proposed to add further text to the both plans, explaining the further work that was undertaken and the reasons for the approach taken to the strategy. This is proposed as a revision to Modification PM/SC/2/C for the South Cambridgeshire Plan, and PM/CC/2/E for the Cambridge Plan.</p>
<p><b>Approach to Proposed Modification</b></p>	<p>Submit proposed modification to the Examination Inspectors with amendments and with the following two additional modifications and an amendment to proposed modification PM/CC/2/A:</p> <p><b>Amend Modification PM/CC/2/E:</b></p> <p>Amend PM/CC/2/E as follows (additional wording is highlighted in <b><u>bold underline</u></b>):</p> <p>In response to issues raised by the Inspectors during the Local Plan Examination, the Councils commissioned a new independent Inner Green Belt Review in 2015. This concluded that beyond those locations already identified in the submission Local Plans it is unlikely that any development could be accommodated without substantial harm to Green Belt purposes (in most locations around the edge of the City). Additional work was carried to consider sites on the edge of Cambridge on an equal basis with other sites, through transport modelling and Sustainability Appraisal. <b><u>Work was also undertaken on an updated Infrastructure Delivery Study and Viability Report with a Development Strategy document that drew together the findings of all the additional work. The Development Strategy Update and the Joint Sustainability Appraisal Addendum set out how the issue of Green Belt was considered through the plan making process, meeting the requirements of paragraphs 84 and 85 of the NPPF to consider the sustainability impacts of developing outside the Green Belt compared with removing land from the Green Belt for development. This work confirmed that the approach to the development strategy. Further work was also undertaken to demonstrate that the transport measures necessary to support sustainable new settlements are capable of being delivered. The Greater Cambridge City Deal provided a position statement in March 2016 that confirms the City Deal partners are wholly committed to delivery of the infrastructure programme for the benefit of existing and future residents and businesses through the provision of an enhanced transport network that provides good quality connectivity between homes and jobs, including supporting and securing new development provided for in the Local Plans through the delivery of key infrastructure schemes.</u></b></p> <p><b>Amend Modification PM/CC/2/A:</b></p>

	<p>Amend the key diagram to take account of changes to Cambridge East/land north of Cherry Hinton (see proposed modification PM/CC/3/A) and Site GB2: Land south of Worts' Causeway (see proposed modification PM/CC/B/B).</p> <p>See amended Figure 2.1 at the end of this table</p> <p><b>Reason:</b> To ensure consistency with proposed modifications PM/CC/B/B and PM/CC/Policies Map/B.</p> <p><b>Proposed Modification PM/CC/B/B:</b> Increase the size of site GB2 to include Newbury Farm (0.9 hectares). See amended excerpt of Appendix B: Proposals Schedule below and amended site map excerpt from the Submission Policies Map.</p> <p><b>Reason:</b> Positively prepared and justified. It would not be positive, reasonable or appropriate for the Local Plans to fail to allocate this site if it can reasonably be brought forward for development to help meet objectively assessed development requirements and it does not cause harm to the Green Belt purposes to do so.</p> <p>Effective. The landowner agrees that the land is deliverable over the plan period. The Council is working with the landowner to bring the site forward.</p> <p>Consistent with national policy. The land is highly sustainable being on the edge of Cambridge and is directly adjacent to a proposed site allocation for release from the Cambridge Green Belt for residential development. The release of the site from the Cambridge Green Belt is not considered to cause harm to the Green Belt purposes.</p> <p><b>Proposed Modification PM/CC/Policies Map/B:</b> Increase the size of site GB2 to include Newbury Farm (0.9 hectares). See amended site map excerpt from the Cambridge Draft Submission Policies Map July 2013.</p> <p><b>Reason:</b> To ensure that the policies map is consistent with proposed modifications to site allocation GB2 in Appendix B: Proposals Schedule (PM/CC/B/B).</p>
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## APPENDIX B: PROPOSALS SCHEDULE

Amend allocation for GB2 to include Newbury Farm. The site size increases from 6.8 hectares to 7.7 hectares.

Site	Address	Area (ha)	Existing uses	Capacity <sup>4</sup>	Provisional issues identified <sup>5</sup>	Planning status <sup>6</sup>
Residential						
<b>GB2</b>	Land south of Worts' Causeway	<del>6.8</del> <u>7.7</u>	Agricultural	230 dwellings 45 dph	<ul style="list-style-type: none"> <li>○ Archaeological investigation required</li> <li>○ Consider on-site community and service provision, jointly with GB1</li> <li>○ Access onto Worts' Causeway</li> <li>○ Single access onto Babraham Road</li> <li>○ Retain existing permissive footpath on west edge of site</li> </ul>	New local plan allocation

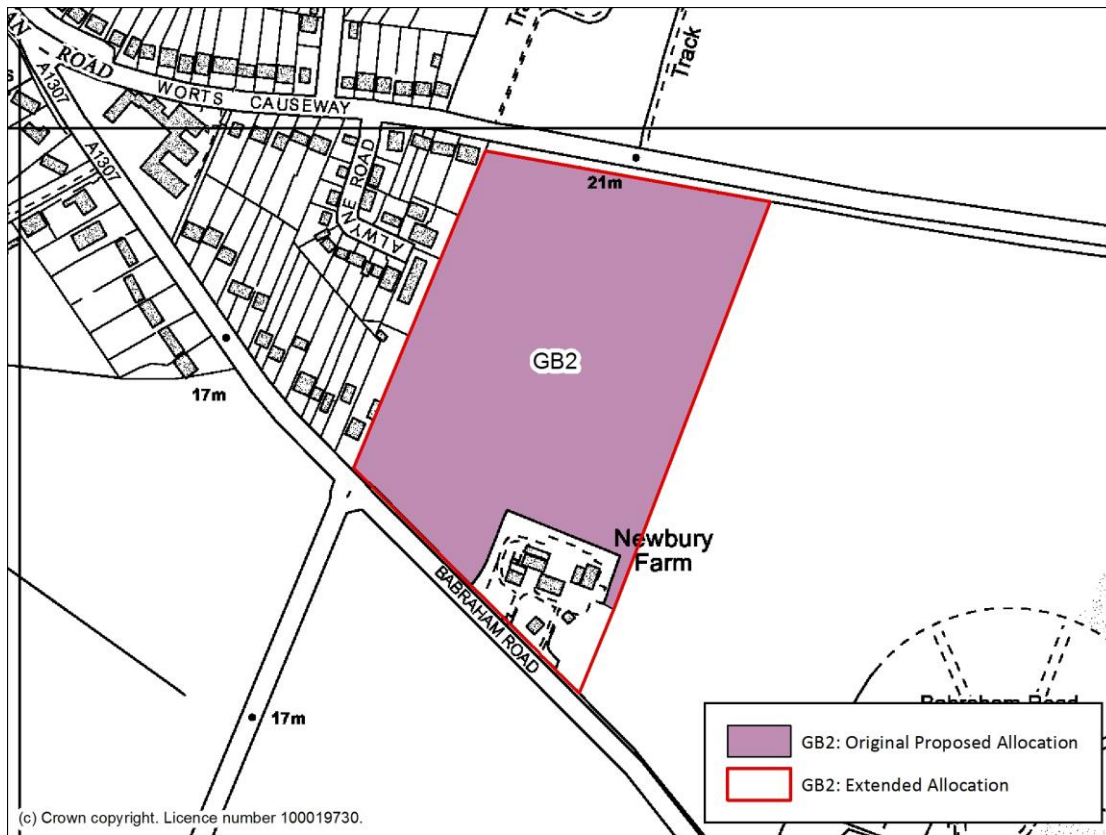
<sup>4</sup> Approximate number based on initial assessment in Strategic Housing Land Availability Assessment (SHLAA); final number may be greater or smaller depending on detailed assessment and detailed design.

<sup>5</sup> Policies in the whole plan must be considered in the development of the sites. However, there are a number of items for each new site that an applicant should be particularly aware of and should consider early when preparing detailed planning proposals. It should not be regarded as an exhaustive list; it is purely intended to be helpful in order to highlight known issues.

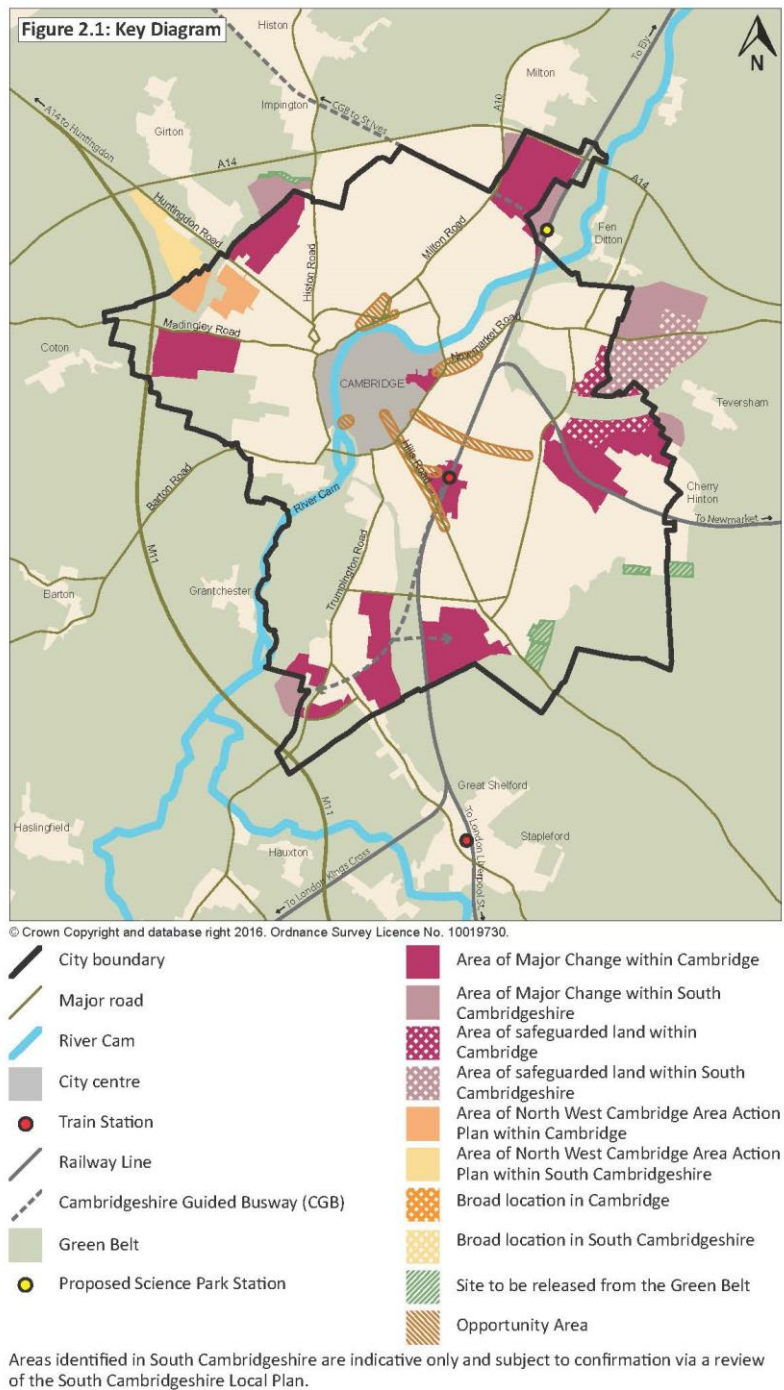
<sup>6</sup> Summary of the status of the site where planning process has progressed, i.e. relationship to 2006 Local Plan, if it has outline planning permission, is under construction or has a pending planning application.



Proposed Modification to the Cambridge Draft Submission Policies Map – July 2013  
(PM/CC/Policies Map/B)



Proposed Modification to Figure 2.1 Key Diagram (PM/CC/2/A)



Proposed Modification: PM/CC/2/F			
Table 2.2			
<b>Representations Received</b>	Support: 1	Object: 8	Total: 9
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Support all amendments.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Commercial Estates Group</b> Objectively Assessed Need is greater than the Councils propose.</li> <li>• <b>Cambridge Past Present and Future</b> Maintains objection to release of GB1 and GB2. Table should be amended to delete estimated housing yield from these developments. New settlements are more sustainable form of development than urban extensions, therefore if 430 homes are needed they should be provided at new settlements.</li> <li>• <b>Pembroke College &amp; Balaam Family, Endurance Estates, Unwins &amp; Biggs, Emmanuel and Gonville &amp; Caius, and Bidwells</b> Strategy remains too heavily reliant on new settlements where significant uncertainty exists with regard to deliverability. Sustainability merits of sites on the edge of the Green Belt have not been given sufficient consideration.</li> <li>• <b>Pigeon Land &amp; LIH</b> Percentage of development proposed in the second tier of settlement hierarchy (the edge of Cambridge) continues to be reliant on commitments carried forward from previous local plans. Provision continues to be made for approximately 50% of the housing requirement in the less sustainable third and fourth tiers of the settlement hierarchy (new settlements and the rural area). None of additional evidence addresses concerns raised about the reliance on the new settlements and also rural area, both of which are less sustainable than the edge of Cambridge.</li> </ul>		
<b>Councils' Assessment</b>	<p>This table sets out the distribution of new dwellings at each level of the development sequence. Representations focus on strategy choices reflected in the table. These issues are considered in the Council's responses to other modifications.</p> <p><u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/CC/2/B.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/CC/2/D.</p> <p><u>Note:</u> Issues regarding sustainability of edge of Cambridge sites in</p>		

	<p>relation to Green Belt are addressed under modification PM/CC/2/D.</p> <p><u>Note:</u> Issues relating to the deletion of GB1 and GB2 are addressed in PM/CC/2/G.</p> <p><u>Note:</u> Issue relating to mistyped number in the Cambridge Urban Area for Table 2.3 is addressed under PM/CC/2/I.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/2/F to the Examination Inspectors.

<b>Proposed Modification: PM/CC/2/G</b>			
<b>Policy 3: Spatial Strategy for the location of residential development</b>			
<b>Representations Received</b>	Support: 3	Object: 14	Total: 17
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents’ Association of Old Newnham</b> Support all amendments.</li> <li>• <b>Historic England</b> Support modifications proposed relating to development strategy.</li> <li>• <b>CPRE</b> Supports provision of 14,000 dwellings between 2011 and 2031.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Grosvenor &amp; USS</b> Combined trajectory does not accord with objective of a continuous high level of housing growth and it will have negative effects for the housing market. No justification for combined trajectory as the NPPF requires each authority to maintain a five year supply.</li> <li>• <b>North Barton Road Landowners</b> Request all references to joint trajectory are deleted. NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual LPAs. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.</li> <li>• <b>Commercial Estates Group</b> The Councils are committed, via the City Deal and the underlying rationale for the Joint Trajectory, to an early review of the Local Plans but this is not captured anywhere within the plans themselves.</li> <li>• <b>Cambridge Past Present and Future</b> GB1 and GB2 should be deleted.</li> <li>• <b>Pembroke College &amp; Balaam Family, Endurance Estates, Unwins &amp; Biggs, Emmanuel and Gonville &amp; Caius, and Bidwells</b> Joint trajectory does not comply with NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and</li> </ul>		

	<p>update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against <u>their</u> housing requirements. The two Councils are still proceeding with separate plans, with separate identified sites to meet their individual housing requirements. There has been no cross boundary sharing of housing needs. The proposed approach has been introduced late in the plan making process to mask deficiencies in the Councils housing land supply in the early part of the plan period. The preparation of the Local Plans has not specifically considered the need to adopt a cross boundary approach to meeting the objectively assessed housing needs. Cambridge has failed to demonstrate why it would not be possible to maintain a rolling 5-year supply of housing within its own boundary.</p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land &amp; LIH SHMA</b> was not compliant with planning practice guidance. PBA report underestimates objectively assessed need as its demographic projections do not take into account past suppression of household formation in young adults. Economic growth expectations are not addressed meaning housing provision and economic growth are not aligned. Resulting lack of local labour will increase in-commuting from outside Cambridge and South Cambridgeshire by 14,900 workers (1 in 3 jobs) which is unsustainable. Significant key market signals on land prices and past under delivery have not been assessed. Our evidence shows Cambridge market signals are much worse than elsewhere in the East of England and are comparable to London. Housing affordability not addressed. No uplift provided to boost affordable housing. Cambridge objectively assessed need should be 15,200 homes and South Cambridgeshire 27,000 homes to 2031. Chosen comparator authorities not appropriate, an uplift of significantly more than 30% justified for Cambridge and 30% for South Cambridgeshire.</li> <li>• Proposal that there are exceptional circumstances to justify Green Belt release of GB1 and GB2 for housing is inconsistent with national policy. These sites are no longer needed to meet targets.</li> <li>• There are no exceptional circumstances for release of GB1 and GB2.</li> <li>• Development of GB1 and GB2 has been fiercely opposed. Sites are unsuitable for development, as should develop brownfield sites first, development will create traffic chaos, and there are no amenities.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p><u>Review of the Local Plan</u> The Greater Cambridge City Deal (RD/Strat/300) states that, 'local partners are committed to an early review of their local plans</p>

	<p>beginning in 2019.’ This commitment was made after the Local Plans were submitted. The Councils would not object to a reference to this effect in the Local Plans, but it is not considered necessary in order to make the plans sound. The change suggested by Commercial Estates Group goes significantly further than this, by proposing an adoption deadline, and that it should include a further assessment of the inner Green Belt boundary. These changes are not supported. It would be premature to conclude an inner Green Belt review is required at that time, or whether an adoption deadline of 2020 was practicable or appropriate.</p> <p><u>Deletion of GB1 and GB2</u>  GB1 and GB2 are consistent with the LDA Design Study’s conclusion that limited development in this location could be undertaken without significant long-term harm to Green Belt purposes. The explanation for this, and the parameters to avoid significant Green Belt harm, are set out in paragraph 6.14.6 of the LDA Design Study. These proposed changes are not supported.  <u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/CC/2/B.</p> <p><u>Note:</u> Issues relating to the joint trajectory are addressed under modification PM/CC/2/C.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/CC/2/D.</p> <p><u>Note:</u> Issues regarding infrastructure delivery and viability are addressed under modification PM/CC/2/D.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/2/G to the Examination Inspectors.

<b>Proposed Modification: PM/CC/2/H Paragraph 2.43</b>			
<b>Representations Received</b>	Support: 1	Object: 12	Total: 13
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Support all amendments. (65194)</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Grosvenor &amp; USS</b> Inner Green Belt Boundary Study is not an appropriate evidence base and does not overcome the issues identified at the examination. Number of concerns relating to methodology and assessment of sector 7.</li> <li>• <b>Cambridge Past Present and Future</b> Release of GB1 and GB2 should be last resort; Cambridge’s objectively</li> </ul>		

	<p>assessed needs are capable of being met within the urban area. Brownfield sites should be developed. Delete wording “including two small Green Belt releases”.</p> <ul style="list-style-type: none"> <li>• <b>Pembroke College &amp; Balaam Family, Endurance Estates, Unwins &amp; Biggs, Emmanuel and Gonville &amp; Caius, and Bidwells</b> Modifications are inaccurate assessment of level of housing supply, which continues to rely on the development of a number of previously developed sites in the city over which there is considerable uncertainty.</li> <li>• <b>Pigeon Land &amp; LIH</b> South Cambs and Cambridge have separate local plans and should therefore have separate housing trajectories. The fact that the City Deal has been signed does not provide justification for the joint approach to the delivery of housing. This was confirmed by the planning appeals at Waterbeach.</li> <li>• Paragraph needs to be amended to reflect the removal of Green Belt sites GB1 and GB2 as no justification of exceptional circumstances remain given that the updated housing land supply.</li> </ul>
<p><b>Councils’ Assessment</b></p>	<p>This proposed modification updates housing numbers as a consequence of other proposed modifications and the latest housing trajectory.</p> <p><u>Reliance on Previously Developed Sites with Considerable Uncertainty</u></p> <p>Cambridge has demonstrated in the housing trajectory included in the Councils’ Housing Land Supply Update 2015 (RD/MC/050) that it can deliver its full objectively assessed need.</p> <p>Cambridge currently has a housing land supply of 14,682 homes. This is being delivered in both the urban area and within urban extensions on the edge of city. Towards the end of the plan period, allocations within the urban area are expected to continue to come forward to allocations to meet objectively assessed need. As set out in the Councils’ Matter 8 hearings statement (paragraph 16), the deliverability of sites has been a key consideration throughout the allocation process. Given the nature of the urban area and the types of sites available, it is unsurprising that a number of sites have issues that require resolution. As a result, a number of urban sites have been phased later in the plan period to allow time to resolve the issues.</p> <p><u>Note:</u> Issues relating to the joint trajectory are addressed under modification PM/CC/2/C.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/CC/2/D.</p>

	<p><u>Note:</u> Issues relating to Green Belt sectors are addressed in PM/CC/2/E.</p> <p><u>Note:</u> Issues regarding the deletion of GB1 and GB2 are addressed under modification PM/CC/2/G.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/2/H to the Examination Inspectors.

<b>Proposed Modification: PM/CC/2/I</b>			
<b>Table 2.3</b>			
<b>Representations Received</b>	Support: 1	Object: 9	Total: 10
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents' Association of Old Newnham</b> Support all amendments.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Commercial Estates Group</b> Objectively Assessed Need is greater than the Councils propose.</li> <li>• <b>Cambridge Past Present and Future</b> Table should be amended to delete estimated housing yield from GB1 and GB2. Urban extensions are less sustainable than new settlements, so GB1 and GB2 should be deleted.</li> <li>• <b>Pembroke College &amp; Balaam Family, Endurance Estates, Unwins &amp; Biggs, Emmanuel and Gonville &amp; Caius, and Bidwells</b> Strategy remains too heavily reliant on new settlements where significant uncertainty exists with regard to deliverability. Sustainability merits of sites on the edge of the Green Belt have not been given sufficient consideration.</li> <li>• <b>Pigeon Land &amp; LIH</b> South Cambs and Cambridge have separate local plans and should therefore have separate housing trajectories. The fact that the City Deal has been signed does not provide justification for the joint approach to the delivery of housing. This was confirmed by the planning appeals at Waterbeach.</li> <li>• Table should be amended to reflect the removal of Green Belt sites GB1 and GB2 as no justification of exceptional circumstances remain given that the updated housing land supply.</li> </ul>		
<b>Councils' Assessment</b>	<p>This table sets out the distribution of new dwellings at each level of the development sequence. Representations focus on strategy choices reflected in the table. These issues are considered in the Council's responses to other modifications.</p> <p>The Councils consider that the modification is sound, although a mistyped number needs to be corrected in the table. The proposed</p>		



	<p>modification to the total for Cambridge Urban Area should read 6,828 not 6,282. This will make the tables in PM/CC/2/F and PM/CC/2/I consistent.</p> <p><u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/CC/2/B.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/CC/2/D.</p> <p><u>Note:</u> Issues regarding sustainability of edge of Cambridge sites in relation to Green Belt are addressed under modification PM/CC/2/D.</p> <p><u>Note:</u> Issues regarding the deletion of GB1 and GB2 are addressed under modification PM/CC/2/G.</p>
<b>Approach to Proposed Modification</b>	<p>Submit proposed modification PM/CC/2/I to the Examination Inspectors with the following minor change:</p> <p>The proposed modification to the total for Cambridge Urban Area should read 6,828 not 6,282.</p>

<b>Proposed Modification: PM/CC/2/J</b>			
<b>Paragraph 2.45</b>			
<b>Representations Received</b>	Support: 3	Object: 9	Total: 12
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Uttlesford DC</b> No comments.</li> <li>• <b>CPRE</b> Supports joint trajectory as entirely consistent with sequential approach outlined in strategy.</li> <li>• <b>Residents' Association of Old Newnham</b> Support all amendments.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Commercial Estates Group</b> The Councils are committed, via the City Deal and the underlying rationale for the Joint Trajectory, to an early review of the Local Plans but this is not captured anywhere within the plans themselves.</li> <li>• <b>North Barton Road Landowners Group</b> Request all references to joint trajectory are deleted. NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual LPAs. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils.</li> <li>• <b>Pembroke College &amp; Balaam Family, Endurance Estates, Unwins &amp; Biggs, Emmanuel and Gonville &amp;</b></li> </ul>		

	<p><b>Caius, and Bidwells</b> Joint trajectory does not comply with NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against <u>their</u> housing requirements. The two Councils are still proceeding with separate plans, with separate identified sites to meet their individual housing requirements. There has been no cross boundary sharing of housing needs. The proposed approach has been introduced late in the plan making process to mask deficiencies in the Councils housing land supply in the early part of the plan period. The preparation of the Local Plans has not specifically considered the need to adopt a cross boundary approach to meeting the objectively assessed housing needs. Cambridge has failed to demonstrate why it would not be possible to maintain a rolling 5-year supply of housing within its own boundary.</p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land &amp; LIH</b> South Cambs and Cambridge have separate local plans and should therefore have separate housing trajectories. The fact that the City Deal has been signed does not provide justification for the joint approach to the delivery of housing. This was confirmed by the planning appeals at Waterbeach.</li> <li>• More evidence is still required – the additional work undertaken is inadequate. High level of disconnect between transport and land use planning, despite being inextricably linked.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p>Proposed modification relates to changes required to reflect the Memorandum of Understanding.</p> <p><u>Note:</u> Issues relating to the joint trajectory are addressed under modification PM/CC/2/C.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/CC/2/D.</p> <p><u>Note:</u> Adding reference to a Local Plan Review is addressed under the assessment of PM/CC/2/G.</p>
<p><b>Approach to Proposed Modification</b></p>	<p>No Change. Submit proposed modification PM/CC/2/J to the Examination Inspectors.</p>

<b>Proposed Modification: PM/CC/2/K</b> <b>Paragraphs 2.46 and 2.47</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents' Association of Old Newnham</b> Support all amendments.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable.</li> </ul>		
<b>Councils' Assessment</b>	Support noted.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/2/K to the Examination Inspectors.		

<b>Proposed Modification: PM/CC/2/L</b> <b>Figure 2.2: Housing Trajectory</b>			
<b>Representations Received</b>	Support: 1	Object: 1	Total: 2
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents' Association of Old Newnham</b> Support all amendments.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• <b>Cambridge Past Present and Future</b> Housing trajectory should be added to Cambridge Local Plan as good overview of the timescales envisaged by the Council. Updated trajectories based on actual rates of delivery are useful means of monitoring changes and should be published in AMRs.</li> </ul>		
<b>Councils' Assessment</b>	The housing trajectory in the submitted Local Plan is out of date and rather than replace it and it become out of date again, updated housing trajectories will be published each year in each Council's Annual Monitoring Report.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/2/L to the Examination Inspectors.		

<b>Proposed Modification: PM/CC/2/M</b> <b>Paragraph 2.48</b>			
<b>Representations Received</b>	Support: 1	Object: 5	Total: 6
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents' Association of Old Newnham</b> Support all amendments.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• <b>Pembroke College &amp; Balaam Family, Endurance Estates, Unwins &amp; Biggs, Emmanuel and Gonville &amp; Caius, and Bidwells</b> Joint trajectory does not comply with</li> </ul>		

	<p>NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against <u>their</u> housing requirements. The two Councils are still proceeding with separate plans, with separate identified sites to meet their individual housing requirements. There has been no cross boundary sharing of housing needs. The proposed approach has been introduced late in the plan making process to mask deficiencies in the Councils housing land supply in the early part of the plan period. The preparation of the Local Plans has not specifically considered the need to adopt a cross boundary approach to meeting the objectively assessed housing needs. Cambridge has failed to demonstrate why it would not be possible to maintain a rolling 5-year supply of housing within its own boundary.</p>
<b>Councils' Assessment</b>	<p>Proposed modification relates to changes required to reflect the Memorandum of Understanding.</p> <p><u>Note:</u> Issues relating to the joint trajectory are addressed under modification PM/CC/2/C.</p>
<b>Approach to Proposed Modification</b>	<p>No Change. Submit proposed modification PM/CC/2/M to the Examination Inspectors.</p>

### Section 3: City centre, areas of major change, opportunity areas and site specific proposals

Proposed Modification: PM/CC/3/A			
Policy 12: Cambridge East			
Representations Received	Support: 12	Object: 3	Total: 15
Main Issues	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• General support from <b>Natural England; CPPF; Cambridgeshire County Council; Historic England; Endurance Estates and Marshall Group Property; Anglian Water Services; Rustat Road Neighbourhood Association; Residents Association of Old Newnham;</b> and various private individuals.</li> <li>• <b>Endurance Estates and Marshall Group Property</b> have submitted new evidence on noise, air quality and how the proposed development will interact with the running of the airport.</li> <li>• The <b>County Council</b> state that the primary and secondary schools are needed on the east side of the city to meet the needs of the growing city and inclusion of their requirement within the policy is supported.</li> <li>• Some supporters of this site suggest it means that GB1 and GB2 no longer need to be removed from the Green Belt. The basic need is already overshot without these two sites, both of which are acknowledged in the revised plan as being of real importance to the city setting.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>CEG</b> argue that the latest transport and infrastructure studies do not support the chosen locations for housing development, including Land North of Cherry Hinton.</li> <li>• <b>CEG</b> argue that the updated transport modelling does not provide any evidence that this scheme will not directly be dependent on the Newmarket to Cambridge transport corridor.</li> <li>• A qualified objection by <b>Endurance Estates and Marshall Group Property</b> to the policy wording; they argue that criteria d to f should be deleted as they imply the allocation is subject to some conditionality.</li> <li>• <b>CPRE</b> argue that the land not to be allocated in this plan is not deliverable and so should be returned to the Green Belt.</li> </ul>		
Councils' Assessment	<p>This site will make a valuable contribution to housing supply in Cambridge and South Cambridgeshire. At the second stage in the development sequence, it remains a highly suitable and sustainable location for development on the edge of Cambridge. The site is not in the Green Belt and is allocated for development in the Cambridge East Area Action Plan 2008. The site is capable</p>		

	<p>of being developed while the airport remains in operation.</p> <p>The remaining land at Cambridge East outside the allocation is proposed to be safeguarded for potential future development. While Marshall is not vacating the Airport in the foreseeable future, there remains the potential that the airport may be developable at some point. The NPPF only allows the Councils to amend the Green Belt boundary (including returning land to the Green Belt) in exceptional circumstances, and that regard must be had to the permanence of the Green Belt. The Councils conclude that it is not appropriate to return land to the Green Belt in this location. This matter was address at the Matter 9 hearing sessions in April 2015.</p> <p>In terms of transport, the evidence is that transport impacts can be acceptably mitigated and there will not be an unacceptable impact on Teversham or Newmarket Road (or elsewhere). The latest transport modelling for this site is contained in the modelling undertaken to support the recent consultation (reference: RD/MC/070). The updated Local Plan transport modelling shows that in the AM Peak in 2031 that journey times on Newmarket Rd decrease with the planned mitigation. The modelling included a range of highway and public transport mitigation measures considered appropriate for the nature of the development, such as a new bus service to the City Centre via Coldham’s Lane.</p> <p>A detailed Transport Assessment will be submitted with any planning application.</p> <p>The Councils do not consider the suggestion to delete criteria d to f proposed by Endurance Estates and Marshall Group Property are appropriate. Criteria d, e and f are important and reasonable considerations that need to be taken into account at the development management stage and need to be met in order to demonstrate that development is acceptable. This is not considered to be an unusual policy approach, and is broadly consistent with Policy CE/35 in the Area Action Plan and the drafted policies included in the Councils’ submission plans.</p>
<p><b>Approach to Proposed Modification</b></p>	<p>No Change. Submit proposed modification PM/CC/3/A to the Examination Inspectors.</p>

<p><b>Proposed Modification: PM/CC/3/B</b> <b>Paragraph 3.16</b></p>			
<p><b>Representations Received</b></p>	<p>Support: 2</p>	<p>Object: 0</p>	<p>Total: 2</p>
<p><b>Main Issues</b></p>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Support from <b>Rustat Road Neighbourhood Association;</b> and <b>Residents’ Association of Old Newnham.</b></li> </ul>		

<b>Councils' Assessment</b>	Support noted.  <u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/CC/3/A.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/3/B to the Examination Inspectors.

<b>Proposed Modification: PM/CC/3/C</b>			
<b>Paragraph 3.17</b>			
<b>Representations Received</b>	Support: 2	Object: 2	Total: 4
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>Support from <b>Rustat Road Neighbourhood Association;</b> and <b>Residents' Association of Old Newnham.</b></li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li><b>CEG</b> argue that the latest transport and infrastructure studies do not support the chosen locations for housing development, including Land North of Cherry Hinton.</li> <li><b>CEG</b> argue that the updated transport modelling does not provide any evidence that this scheme will not directly be dependent on the Newmarket to Cambridge transport corridor.</li> <li><b>CPRE</b> argue that the land not to be allocated in this plan is not deliverable and so should be returned to the Green Belt.</li> </ul>		
<b>Councils' Assessment</b>	Support noted.  <u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/CC/3/A.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/3/C to the Examination Inspectors.		

<b>Proposed Modification: PM/CC/3/D</b>			
<b>New paragraphs after paragraph 3.17</b>			
<b>Representations Received</b>	Support: 3	Object: 0	Total: 3
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>Support from <b>Cambridgeshire County Council; Rustat Road Neighbourhood Association;</b> and <b>Residents' Association of Old Newnham.</b></li> <li>The <b>County Council</b> state that the primary and secondary schools are needed on the east side of the city to meet the needs of the growing city and inclusion of their requirement within the policy is supported.</li> </ul>		
<b>Councils' Assessment</b>	Support noted.		

	<u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/CC/3/A.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/3/D to the Examination Inspectors.

<b>Proposed Modification: PM/CC/3/E</b>			
<b>Figure 3.2</b>			
<b>Representations Received</b>	Support: 3	Object: 0	Total: 3
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Support from <b>Cambridgeshire County Council; Historic England; and Residents' Association of Old Newnham.</b></li> <li>• The <b>County Council</b> state that the primary and secondary schools are needed on the east side of the city to meet the needs of the growing city and inclusion of their requirement within the policy is supported.</li> </ul>		
<b>Councils' Assessment</b>	Support noted.  <u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/CC/3/A.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/3/E to the Examination Inspectors.		



## Section 4: Responding to climate change and managing resources

<b>Proposed Modification: PM/CC/4/A</b>			
<b>Policy 27: Carbon reduction, community energy networks, sustainable design and construction and water use</b>			
<b>Representations Received</b>	Support: 2	Object: 3	Total: 5
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Anglian Water</b> Support the Council's approach to water efficiency standards and will work with the Council and developers to deliver these requirements.</li> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Revised water requirements do not take account of the water availability and the level of water stress in the area. There is a good chance that Cambridge Water do not have sufficient water in the chalk aquifer to safely and sustainably maintain the proposed growth of Cambridge and its environs;</li> <li>• It has not been proven that Cambridge will not have water supply problems – the word severe should be retained;</li> <li>• <b>Historic England</b> Concerned about the potential impact of the revised wording related to bespoke sustainability assessment frameworks on listed buildings – revised wording suggested.</li> </ul>		
<b>Councils' Assessment</b>	<p>Support from Anglian Water noted.</p> <p>Regarding the retention of the word 'severe' in relation to water stress, this amendment was in direct response to a representation from the Environment Agency during the Proposed Submission Consultation who noted that while Cambridge was in an area of water stress, the level of water stress was not 'severe'.</p> <p>Regarding the concerns that the revised water requirements do not go far enough to sustainably maintain the proposed growth of Cambridge and its environs, this concern is noted. The Council had originally intended to require a more stringent water efficiency requirement for all new development in light of the evidence of water availability contained in the Cambridge Water Resources Management Plan (RD/CC/100). This requirement of 80 litres/person/day had been subject to viability testing and had been found to be viable and had support for Cambridge Water, Anglian Water and the Environment Agency. However, changes to national policy in light of the Government's Housing Standards Review, and the introduction of national technical standards has meant that we are no longer able to seek such a level of water efficiency through planning policy. Instead we are restricted to</p>		

	<p>setting the standard included in proposed modification PM/CC/4/A. The Council shares the concerns about the impact that this change may have on long term water resource availability. It is therefore considered important that a degree of flexibility be included in the plan so that should changes to the national technical standards enable the setting of more stringent water efficiency standards, this should be able to come forward. Wording has been suggested at paragraph 4.9.</p> <p>Regarding the proposed amendment suggested by Historic England, it was not the intention of the policy to have an impact on the integrity of listed buildings. However, we note the concerns of Historic England and would support the inclusion of their revised wording.</p>
<b>Approach to Proposed Modification</b>	<p>Submit proposed modification PM/CC/4/A to the Examination Inspectors with the following further change:</p> <p>Where redevelopment/refurbishment of existing buildings is proposed, the development of bespoke assessment methodologies to assess the environmental impact of the proposals for submissions with the planning application will be supported, subject to agreement of the scope of the alternative methodology with the council. Proposals that lead to levels of environmental performance equivalent to or higher than BREEAM will be supported. <u>Where proposals relate to designated heritage assets, care will need to be taken to ensure that any proposals related to environmental performance are considered against the significance of the heritage asset and do not cause unacceptable harm to the assets significance.</u></p>

<b>Proposed Modification: PM/CC/4/B</b>			
<b>Table 4.1</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/4/B to the Examination Inspectors.		

Proposed Modification: PM/CC/4/C Paragraph 4.6			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/4/C to the Examination Inspectors.		

Proposed Modification: PM/CC/4/D Paragraph 4.7			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/4/D to the Examination Inspectors.		

Proposed Modification: PM/CC/4/E Paragraph 4.8			
<b>Representations Received</b>	Support: 1	Object: 1	Total: 2
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• <b>Home Builders Federation</b> The wording is contrary to national policy as the Council should not be setting construction standards for new housing.</li> </ul>		
<b>Councils' Assessment</b>	Regarding the concern that the wording is contrary to national policy, the wording of the proposed change states that "... the Council will be supportive of schemes that seek to utilise standards such as the BRE's Home Quality Mark, the Passivhaus Standard or Leadership in Energy and Environmental Design (LEED)". This supporting text to Policy 27 does not, at any point, set specific construction requirements for new homes but seeks to		

	demonstrate the Council's continued support for those who continue to wish to build to higher sustainability standards than are currently contained within Building Regulations, giving examples of the types of standards that are available in the current market. While national policy is clear that local planning authorities cannot set specific requirements, it does not preclude them from showing support to those developers who would wish to use other non-mandatory standards as a means of demonstrating how their development meets the principles of sustainable development, particularly where this is contained in supporting text and not in policy.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/4/E to the Examination Inspectors.

<b>Proposed Modification: PM/CC/4/F Paragraph 4.9</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/4/F to the Examination Inspectors.		

<b>Proposed Modification: PM/CC/4/G Paragraph 4.10</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/4/G to the Examination Inspectors.		

<b>Proposed Modification: PM/CC/4/H</b>			
<b>Policy 28: Allowable Solutions for zero carbon development and supporting text paragraphs 4.13 – 4.16</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/4/H to the Examination Inspectors.		

<b>Proposed Modification: PM/CC/4/I</b>			
<b>Policy 29: Renewable and low carbon energy generation</b>			
<b>Representations Received</b>	Support: 2	Object: 0	Total: 2
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Natural England</b> Requirements to ensure adverse impacts on the environment are minimised are supported;</li> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/4/I to the Examination Inspectors.		

<b>Proposed Modification: PM/CC/4/J</b>			
<b>Insert new paragraph after 4.21</b>			
<b>Representations Received</b>	Support: 1	Object: 2	Total: 3
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• <b>Gamlingay Community Turbine Group</b> Modification is factually incorrect. The wind resource in Cambridge is actually greater than in much of northern Europe where wind projects are widespread. Ignores increasing developments in technology and the wind turbine at the Smartlife Centre;</li> <li>• There is absolutely no evidence for the statement being</li> </ul>		

	<p>made. It ignores opportunities for wind generation on high rise buildings which is becoming increasingly common in many cities. There are also many open spaces in the City which would be suitable. Statements such as 'wind energy is constrained' MUST be backed up with proper scientific evidence to be of any value.</p>
<p><b>Councils' Assessment</b></p>	<p>Support noted.</p> <p>Wind resource mapping was undertaken as part of the Decarbonising Cambridge Study (RD/CC/250). This showed that the wind resource in Cambridge is not sufficient to make wind turbines technically feasible, due to both the relatively modest raw wind resource and the urban characteristics of the area, which can further constrain the technical feasibility of wind turbines.</p>
<p><b>Approach to Proposed Modification</b></p>	<p>No Change. Submit proposed modification PM/CC/4/J to the Examination Inspectors.</p>

## Section 5: Supporting the Cambridge economy

Proposed Modification: PM/CC/5/A Paragraph 5.18			
<b>Representations Received</b>	Support: 1	Object: 1	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Change of use from employment to residential inside Cambridge should be permitted readily, as there are already too many jobs in Cambridge compared with residential provision. On the other hand in satellite settlements there is currently oversupply of houses compared with employment, so the opposite applies.</li> </ul>		
<b>Councils' Assessment</b>	<p>Support noted. Government's changes to permitted development rights will help to support the change of use from employment use to residential. Nevertheless, the Cambridge economy is resilient, dynamic, and a world leader in the fields of education and research. The Council will aim to strengthen and diversify Cambridge's economy and enable the growth of jobs within Cambridge.</p>		
<b>Approach to Proposed Modification</b>	<p>No Change. Submit proposed modification PM/CC/5/A to the Examination Inspectors.</p>		

## Section 6: Maintaining a balanced supply of housing

Proposed Modification: PM/CC/6/A			
Policy 45: Affordable housing and dwelling mix			
<b>Representations Received</b>	Support: 4	Object: 3	Total: 7
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> <li>• <b>Historic England</b> No objections to the proposed modifications.</li> <li>• <b>Rustat Road Neighbourhood Association</b> In view of repeated attempts by developers to wriggle out of affordable housing quotas, together with government regulations which are biased towards developers, it is vital that the wording of our Local Plan is as clear and watertight as is possible. The suggested revised Affordable Housing SPD must be practical, defensible and unambiguous; thus providing a sound defence against developers seeking to circumvent it;</li> <li>• Vital that such affordable housing is provided in the mix, and essential that this policy is then strictly adhered to.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Home Builders Federation</b> Object as it is unlikely that Starter Homes will be confined to ‘Starter Homes Exception Sites’ and more likely that the requirement will apply to all residential sites in addition to or in lieu of affordable housing. As such the reference to Starter Homes Exception Sites should be deleted;</li> <li>• <b>Histon &amp; Impington Parish Council</b> Concerned about the level of affordable housing being provided by developments at Northstowe and Wing and elsewhere, and regards it as imperative to strengthen the plan and delivery of the 40% that other developments in and around Cambridge are delivering in order to: <ul style="list-style-type: none"> <li>○ meet the current demand for affordable housing</li> <li>○ provide the housing for the new workers needed to support both the incoming knowledge/high tech workers and also the new developments themselves.</li> </ul> </li> <li>• <b>HTS Estates Ltd</b> This representation refers to PM/CC/6/A which modifies policy 45: Affordable Housing. This modification exacerbates the concerns expressed in representation ID: 26172 submitted in September 2013. The proposed modification will not assist the viability of development of brownfield sites in the City and thereby urban regeneration.</li> </ul>		
<b>Councils’</b>	The Council notes the concerns expressed by respondents in		



<b>Assessment</b>	<p>respect of starter homes. With regard to starter homes, the Housing and Planning Bill is currently at committee stage in the House of Lords. If the Bill gains Royal Assent, a number of consequential changes will need to be made to the Local Plan to ensure that it is consistent with legislation and national planning guidance.</p> <p>In terms of viability, the Council notes concerns raised by respondents regarding the need to maintain levels of delivery of affordable housing to meet local need and the potential impact of Policy 45 in relation to the viability of smaller development sites. The Council will continue to seek a policy-compliant percentage of affordable housing within developments, wherever possible. It should be noted that paragraph 6.4 of the Local Plan states that <i>“Where a developer considers that meeting the affordable housing target percentage will be unviable, robust evidence of this must be provided in the form of an independent viability appraisal. Negotiations between the council and the developer will need to take place to ensure clarity about the particular circumstances which have given rise to the development’s reduced viability or non-viability, either on an open book valuation or involving an independently commissioned assessment using the Homes and Communities Agency’s Development Appraisal Tool or other equivalent tools agreed with the council in advance of assessment.”</i> This approach allows for a reduction in affordable housing provision only where it is proven that the scheme would not be viable otherwise. This is compliant with national planning policy.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/6/A to the Examination Inspectors.

<b>Proposed Modification: PM/CC/6/B Paragraph 6.14</b>			
<b>Representations Received</b>	Support: 1	Object: 1	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• In Cambridge student accommodation is an easy choice for developers to build small rooms in central areas without being subject to any quality or space standards. The local authority can and should act above and beyond the minimum required in the National Policy in this case due to its special status as a university city.</li> </ul>		
<b>Councils’ Assessment</b>	Support noted. The Council notes the concerns raised in respect of the quality and size of student accommodation being delivered		

	in Cambridge. The Council is commissioning further work on student accommodation, which will include issues surrounding the quality and quantity of accommodation. It should be noted, however, that following discussions with the Department for Communities and Local Government, it has been confirmed that the Council cannot apply the Government's national technical standard for residential space standards or accessibility to student accommodation. There are no exemptions for local authority areas with large student populations.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/6/B to the Examination Inspectors.

<b>Proposed Modification: PM/CC/6/C Paragraph 6.22</b>			
<b>Representations Received</b>	Support: 1	Object: 2	Total: 3
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Home Builders Federation</b> Lifetime Homes has demised as an appropriate construction standard and reference can only be made to Part M4(2) and M4(3). Reference to Lifetime Homes should be deleted;</li> <li>• Unless some space standards will be applied to HMO and Sui Generis uses developers will find this as a default preferred to the building of new homes. In Cambridge where there is a high demand for accommodation for students the HMO will become a better investment than building high quality and much needed homes.</li> </ul>		
<b>Councils' Assessment</b>	<p>The Council is still considering the Government's accessibility standard and may provide further modifications relating to Policy 51 and supporting text, including paragraph 6.22 relating to HMOs at a later stage of the examination.</p> <p>The Council notes the concerns raised in respect of the quality and size of housing in multiple occupation in Cambridge. It should be noted, however, that the Council cannot apply the Government's national technical standard for residential space standards or accessibility to housing in multiple occupation as the Council is not permitted to do so. There are no exemptions for local authority areas with large numbers of houses in multiple occupation.</p>		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/6/C to the Examination Inspectors.		

<b>Proposed Modification: PM/CC/6/D</b>			
<b>Policy 50: Residential space standards</b>			
<b>Representations Received</b>	Support: 3	Object: 3	Total: 6
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Hallmark Hotels</b> Support the proposed modification and the evidence base upon which this is built upon is considered justified. However, we would recommend a degree of flexibility to allow for sustainable and brownfield sites to come forward for housing;</li> <li>• <b>Residents Association of Old Newnham</b> Fully support the modifications proposed;</li> <li>• <b>Historic England</b> Have no objections to the proposed WMS modifications.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Home Builders Federation</b> There has been no assessment of need so the case for adopting the Nationally Described Space Standards has not been made;</li> <li>• <b>Home Builders Federation</b> Unclear how the provision would affect Starter Homes;</li> <li>• <b>Home Builders Federation</b> Assessment of impact on affordability has not been made;</li> <li>• <b>Home Builders Federation</b> External residential space standards are not covered by the WMS, but approach is unsound given the development pressures in Cambridge;</li> <li>• <b>Home Builders Federation</b> Unclear what the Council is stipulating in terms of optional technical standards for accessibility. The costs for M4(2) and M4(3) are treated as a 'potential variable cost' – unclear what this means;</li> <li>• Fully support the adoption of National Space Standards as the bare minimum. However, the Council could aspire to propose better and more accurate conditions than recommended by the document in order to become a true leader in national level, as it does in all other aspects;</li> <li>• <b>HTS Estates Ltd</b> This representation refers to PM/CC/6/D which modifies policy 50: Residential Space Standards. This modification exacerbates the concerns expressed in representation ID: 26174 submitted in September 2013. The proposed modification will further compromise the viability of development of brownfield sites in the City and thereby urban regeneration.</li> </ul>		
<b>Councils' Assessment</b>	<p>The Council recognises that the provision of sufficient space within new homes is an important element of good residential design and new dwellings should provide sufficient space for basic daily activities and needs. As residential space standards are based on the amount of space needed for key items of furniture and circulation space within dwellings, the requirements of the Optional Technical Standard are not significantly different from those</p>		

	<p>already proposed in the Cambridge Local Plan 2014: Proposed Submission. These internal space standards would apply to all homes, including starter homes. It is not possible for Councils to require a standard higher than the Optional Technical Standard on internal space standards or for it to be applied to student accommodation or housing in multiple occupation.</p> <p>In assessing need and drawing up the policy for the Submission Local Plan, the Council undertook research on the unit sizes of a number of approved developments within Cambridge, in order to ascertain how the proposed standards were related to development being delivered in Cambridge. Whilst the majority of the assessed schemes coming forward in the city were considered to meet or exceed the proposed standards, there was a number failing the standard. This work has been updated to reflect the requirements of the Government's Optional Technical Standard. The Council has assessed a sample of planning applications approved since 2008. The planning applications selected for further assessment were chosen on the basis of the number of bedrooms in order to allow assessment of a range of different unit types and bedrooms against the standard and on the basis of availability of full plans. The majority of applications assessed were submitted to the Council in 2009 – 2013.</p> <p>In relation to viability, the Council originally commissioned viability work on the delivery of affordable housing, for overall plan viability and for the Community Infrastructure Levy which included minimum internal space standards for a range of dwelling units based on the London Plan standard in order to help test that building to this standard would be viable. The Council has commissioned an update to its viability work to assess the Government's Optional Technical Standard requirements. This update (2015) has shown that the inclusion of the Government's Optional Technical Standard requirements are not likely to impact on the viability of development.</p> <p>With reference to the timing of introduction of the Optional Technical Standard, the development industry has already been aware of the Council's intention to introduce minimum internal space standards for some time. Whilst the Council intended to introduce standards as set in the Cambridge Local Plan 2014: Proposed Submission, these proposed standards are not significantly different from those proposed in the Government's optional national space standard. All stages of plan-making for the emerging Local Plan have included questions, issues and options or policies pertaining to internal space standards. Furthermore, planning officers are informally using the Government's optional national space standard already to assess development proposals</p>
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	<p>where schemes appear to represent overdevelopment. Whilst the optional national space standard is not used at this stage by the Council to refuse planning applications, it is proving to be a helpful indicator for both planning officers and developers in terms of design and layout of schemes at pre-application stage.</p> <p>External space standards are not the subject of this Proposed Modifications consultation as the Government has not set out any requirements for external space standards through new technical standards or Written Ministerial Statements.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/CC/6/D to the Examination Inspectors.

## Appendix B: Proposals Schedule

Proposed Modification: PM/CC/B/A Site R40			
<b>Representations Received</b>	Support: 2	Object: 1	Total: 3
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>Support from <b>Historic England</b>; and <b>Residents' Association of Old Newnham</b>.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li><b>CEG</b> argue that the latest transport and infrastructure studies do not support the chosen locations for housing development, including Land North of Cherry Hinton.</li> <li><b>CEG</b> argue that the updated transport modelling does not provide any evidence that this scheme will not directly be dependent on the Newmarket to Cambridge transport corridor.</li> </ul>		
<b>Councils' Assessment</b>	<p>Support noted.</p> <p><u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/CC/3/A.</p>		
<b>Approach to Proposed Modification</b>	<p>No Change. Submit proposed modification PM/CC/B/A to the Examination Inspectors.</p>		

## Policies Map

Proposed Modification: PM/CC/PoliciesMap/A Policies Map			
<b>Representations Received</b>	Support: 2	Object: 0	Total: 2
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>Support from <b>Residents' Association of Old Newnham, and Historic England.</b></li> </ul>		
<b>Councils' Assessment</b>	Support noted.  <u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/CC/3/A.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification to the Examination Inspectors.		

## Minor Modifications

### Section 2: The Spatial Strategy

Proposed Modification: MM/CC/2/A Paragraph 2.27			
<b>Representations Received</b>	Support: 1	Object: 1	Total: 2
<b>Main Issues</b>	<p><b>Support:</b></p> <ul style="list-style-type: none"> <li>• <b>Residents' Association of Old Newnham</b> supports the proposed modification.</li> </ul> <p><b>Object:</b></p> <ul style="list-style-type: none"> <li>• The new evidence fails to address the Inspectors' concerns regarding the infrastructure and sustainable transport options needed to deliver truly sustainable new settlements.</li> </ul>		
<b>Councils' Assessment</b>	<p>Support for the proposed modification noted.</p> <p><u>Note:</u> The main issues raised regarding the proposed Development Strategy are addressed under modification PM/CC/2/D.</p>		
<b>Approach to Proposed Modification</b>	<p>No change. Submit proposed modification MM/CC/2/A to the Examination Inspectors.</p>		



### Section 3: City centre, areas of major change, opportunity areas and site specific proposals

Proposed Modification: MM/CC/3/A Paragraph 3.15			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>Support from <b>Residents' Association of Old Newnham.</b></li> </ul>		
<b>Councils' Assessment</b>	Support noted. <u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/CC/3/A.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification MM/CC/3/A to the Examination Inspectors.		

# Proposed Modifications to the Submission South Cambridgeshire Local Plan 2014

## Main Modifications

### Chapter 2: Spatial Strategy

Proposed Modification: PM/SC/2/A Paragraph 2.11			
Representations Received	Support: 4	Object: 18	Total: 22
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>The Green Belt is important to keep Cambridge attractive, for residents and for recruiting and retaining highly-qualified staff against global competition. Intrusions into it should be allowed only under exceptional circumstances.</li> <li><b>CPRE</b> supports the increase in the housing provision to 19,500 from 19,000. It is considered that whilst the target remains uncomfortably high, it is a relief to note that the increase is modest.</li> <li>Further investigations have broadly supported the previous assessment of future housing requirements. It is very important that this assessment is robust enough to thwart attempts by developers to develop new sites not in the plan and / or to overdevelop agreed sites.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li><b>MCA</b> The PBA assessment of objective assessed housing need fails to meet requirements in PPG and proposed increase in housing will do little to address Inspector's concerns. From evidence and in light of market signals, proposed increase of only 500 homes insufficient. Data shows requirement for between 1,073 and 1,125 dwellings per annum. Based on numbers suggested Council would need to plan for an additional 2,460 -3,500 homes over period 2011-2031. Unallocated part of West Cambourne Site would deliver an additional 1,150 new dwellings. Significant contribution to meeting Objectively Assessed Housing Need.</li> <li><b>Great Shelford 10 Acres</b> The modification does not accurately reflect the conclusions of the additional evidence produced in respect of the Green Belt and perpetuates the inconsistency with the spatial strategy set out within Policy S/1, particularly in relation to the rural areas and villages in the Green Belt, where development is directed to villages lower in the rural hierarchy, outside of the Green Belt.</li> <li><b>SBRLOG, NBRLOG</b> The PBA evidence ignores the plans' economic aspirations and the level of housing provision</li> </ul>		

	<p>necessary to support this; fails to consider assumptions inherent in demographic modelling used on household formation rates; does not consider land values as a market signal; is dismissive of the affordable housing need. The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire.</p> <ul style="list-style-type: none"> <li>• <b>Grosvenor</b> House prices 45% above 2007/08 peak in Cambridge and 25% in South Cambridgeshire compared to 2.5% rise in England and Wales. Comparator authorities used in PBA report not appropriate. A dwelling uplift to the OAN of significantly more than 30% justified for Cambridge and more than 20% for South Cambridgeshire.</li> <li>• <b>Green Party</b> The increase to 19,500 will threaten the Green Belt, and harm sustainability and quality of life. Housing needs should be first met through better use of existing stock (vacant homes, second homes and under occupancy). New homes must be genuinely affordable.</li> <li>• <b>Laragh Homes</b> While it is not disputed that Cambridge is a significant influencing factor on the Development Strategy for South Cambridgeshire it is not considered that sufficient account has been taken of the development needs of the surrounding districts and their relationship with Cambridge and South Cambridgeshire. The opportunity to allocate further sites in sustainable locations to broaden the supply of housing in the earlier parts of the plan has not been taken into account.</li> <li>• <b>Scott Properties</b> PBA predicts an OAN of 17,579 for South Cambridgeshire based on DCLG 2012 projections which is below the SHMA figure of 19,000 homes. The higher figure is preferred. The 10% uplift should be applied to the SHMA 19,000 target not to the 17,579 OAN. This gives 20,900 which should be the figure for South Cambridgeshire. Full provision is not made for the extra City Deal 1,000 homes.</li> <li>• <b>Cambridge PPF</b> supports the 2015 re-calculation of the objectively assessed housing needs for South Cambridgeshire of 19,337 new homes, rounded up to a housing target of 19,500 for the plan period. However, the Council should prepare its Register of Brownfield sites, the development of which should be a higher priority in the development sequence than greenfield sites, especially in the Green Belt.</li> <li>• <b>Home Builders Federation</b> An uplift greater than the planned 10% is warranted in South Cambridgeshire to help tackle affordability pressures and facilitate the supply of more affordable housing. The OAN for South</li> </ul>
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	<p>Cambridgeshire should be 21,095 dwellings. This should be rounded down to 21,000 for the purposes of the plan, generating an annual average of 1,050 dwellings.</p> <ul style="list-style-type: none"> <li>• <b>Waterbeach Parish Council</b> Development on the edge of Cambridge has sustainability and viability advantages as shown by the SDSR (Sustainable Development Strategy Review). Funding shortfall for the new settlements of £1.3 billion. The Cambridge urban area should be allowed to grow.</li> <li>• <b>U&amp;B, Endurance Estates, Pembroke College and Balaam Family, Barratt</b> PBA report is flawed because it does not consider economic trends. OAN should be 24,400. Market signals indicate long term undersupply compared to demand. It is not compliant with national guidance.</li> <li>• <b>Pigeon and LIH</b> The level of objectively assessed housing need has been under-estimated. The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes. Significant key market signals; land values and past under delivery have not been considered. No adjustment has been made to take account of the level of affordable housing need. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.</li> </ul>
<b>Councils' Assessment</b>	<u>Note:</u> see the assessment under modification PM/SC/2/H.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/A to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/B</b>			
<b>New paragraph after 2.12 – Memorandum of Understanding regarding Joint Housing Trajectory</b>			
<b>Representations Received</b>	Support: 5	Object: 23	Total: 28
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Cambridge PPF</b> Support MoU. Common sense should dictate that the housing trajectories should be considered jointly as the two Councils are so inter-twined. The Councils are discharging their statutory Duty to Cooperate, including the need for neighbouring authorities to plan together.</li> <li>• <b>Wellcome Trust</b> Support the MoU.</li> <li>• <b>CPRE</b> Supports joint trajectory as entirely consistent with</li> </ul>		

	<p>sequential approach outlined in strategy.</p> <ul style="list-style-type: none"> <li>• <b>Rustat Road Neighbourhood Association</b> Support MoU – please to see further example of joint working.</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Support joint housing trajectory and MoU – reflects close functional relationship between Councils and joint development strategy, Duty to Cooperate, and City Deal. Ensures the plan is flexible. Single approach is required to deliver sustainable development. Council has taken a more cautious approach to delivery of Bourn Airfield than proposed by the developers.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>CALA Homes, Quy Estate, Shelford Investments Ltd, North Barton Road Land Owners Group, and Ely Diocesan Board of Finance</b> Request all references to joint trajectory are deleted. NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual LPAs. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils. No action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The South Cambs housing trajectory should be treated with caution and is highly likely to be overly optimistic because historic monitoring data demonstrates less housing is delivered than predicted. Over reliance on new settlements to maintain an adequate housing land supply is a risky strategy. Timetable for delivery needs to be reassessed in detail.</li> <li>• <b>Barratt Eastern Counties &amp; North West Cambridge Consortium of Landowners, Endurance Estates, Unwins &amp; Biggs, Pembroke College &amp; Balaam Family, Great Shelford Ten Acres and Bidwells</b> Joint trajectory does not comply with NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against <u>their</u> housing requirements. The two Councils are still proceeding with separate plans, with separate identified sites to meet their individual housing requirements. There has been no cross boundary sharing of housing needs. The proposed approach has been introduced late in the plan making process to mask deficiencies in the Councils housing land supply in the early part of the plan period. South Cambs has not adequately demonstrated that it is not possible to meet the current</li> </ul>
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	<p>undersupply of housing within its own boundary. The preparation of the Local Plans has not specifically considered the need to adopt a cross boundary approach to meeting the objectively assessed housing needs. Updated housing trajectory and five year supplies for Cambridge and South Cambs provided - including reduced supply assumptions for windfalls and combined rate for Cambourne and Bourn.</p> <ul style="list-style-type: none"> <li>• <b>Laragh Homes</b> Object to joint trajectory. Whilst it is acknowledged that national planning policy allows LPAs to work with neighbouring authorities under the Duty to Cooperate, it is not considered that this should extend to the calculation of their five-year land supply. South Cambs does not have significant constraints that warrant it to be reliant on Cambridge for housing delivery in the early part of the plan period. It is not so constrained that it should be relying on Cambridge City to meet a shortfall in housing land supply in the early parts of the plan period.</li> <li>• <b>Commercial Estates Group</b> The Councils are committed, via the City Deal and the underlying rationale for the Joint Trajectory, to an early review of the Local Plans but this is not captured anywhere within the plans themselves.</li> <li>• <b>Home Builders Federation</b> Not clear what the Council is proposing. The Councils have not prepared a joint plan, therefore each will need to produce its own housing trajectory supported by a five year housing land supply in accordance with the NPPF. The two Councils appear to want the benefit of joint plan but without having to surrender political control. South Cambs need to ensure that it is delivering homes during the early part of the plan as providing homes to meet housing needs cannot be delayed until the latter years of its plan. If South Cambs is unable to demonstrate a five year housing land supply then its plan is unsound.</li> <li>• <b>Pigeon Land &amp; LIH</b> South Cambs and Cambridge have separate local plans and should therefore have separate housing trajectories. The fact that the City Deal has been signed does not provide justification for the joint approach to the delivery of housing. This was confirmed by the planning appeals at Waterbeach.</li> <li>• <b>Hill Residential</b> Housing trajectory fails to take account of pre-application advice which suggests a higher number of dwellings should be provided on Policy H/1b - allocation should be increased to 120 dwellings.</li> <li>• <b>Waterbeach Parish Council</b> Council has failed to take account of advice in sustainable development strategy review suggesting that building on the edge of Cambridge will assist in viability and sustainability. Doubt in ability to</li> </ul>
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	<p>fund infrastructure for new settlements, therefore focus should be on edge of Cambridge.</p> <ul style="list-style-type: none"> <li>• <b>Grosvenor &amp; USS</b> Delete MoU. Both plans identify that they are meeting their own needs, therefore no need for joint five year housing trajectory. Significant concerns as to how the approach will work in practice and how any shortfall will be rectified. In which local authority area would that shortfall be made up? What happens in the circumstances where there is persistent under delivery in one local authority - should a 5% or 20% buffer be applied?</li> <li>• <b>MCA Developments</b> MoU appears to mainly exist because given its track record it is necessary for South Cambs to amalgamate future housing delivery with that of a more successful authority to avoid the need for step change delivery. Approach is predicated on South Cambs exporting its unmet housing needs into significantly more expensive HMA. The two plans do not independently provide for a rolling five year housing supply across the plan period, which does not accord with the spirit of the NPPF and was therefore rightly rejected by the appeal Inspector at Waterbeach.</li> <li>• <b>Laragh Homes</b> Sufficient account has not been taken of the development needs of the surrounding districts and their relationship with Cambridge and South Cambs. The opportunity to allocate further sites in sustainable locations to broaden the supply of housing in the earlier parts of the plan has not been taken into account.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p><u>Principle of MoU</u>  The Councils agreed a Memorandum of Understanding (MoU<sup>7</sup>) on the Greater Cambridge Joint Trajectory in September 2014. The MoU set out the agreement that the housing trajectories for Cambridge and South Cambridgeshire should be considered together for the purposes of the phasing of housing delivery, and for calculating five year supply for plan making and decision taking. The Councils remain committed to each providing its own OAN within its area. The MoU responds to and is justified by a number of changes in circumstance since the plans were submitted, which are outlined in detail in the Councils' Matter 8 hearing statement (see paragraph 76).</p> <p><u>Consistency with National Policy</u>  The Councils are firmly of the view that the MoU is soundly based and consistent with national policy. Both plans are consistent with paragraph 47 of the NPPF in that both Councils have committed to meeting their own objectively assessed needs in full within their respective areas. Paragraph 47 does not say that a local planning</p>

<sup>7</sup> Memorandum of Understanding: Greater Cambridge Joint Housing Trajectory (RD/STRAT/350)

authority must meet its five year supply requirement within its area. The PPG specifically provides for a local authority to take the approach adopted in the MoU, stating that local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible, however where this cannot be met in the first five years, local planning authorities will need to work with neighbouring authorities under the Duty to Co-operate. Paragraph 181 of the NPPF also states that fulfilling the Duty to Cooperate should be a continuous process of engagement from initial thinking through to implementation.

Concerns how a Joint Trajectory and Five Year Supply will Work in Practice

Respondents have queried how a joint trajectory and joint five year supply will work in practice, for example if it is determined that a different buffer should be applied to each local authority, and if the two local authorities cannot demonstrate a joint five year supply, which local authority will make up the shortfall. The two Councils will work together under the duty to co-operate to ensure that the joint trajectory and joint five year supply will work in practice. The joint five year supply has so far been calculated using the total housing requirement for the Greater Cambridge area and the total actual and predicted completions. However the joint five year supply can be calculated for each local authority using the relevant buffer and then added together if that is determined to be appropriate. If a shortfall arises, the two Councils will work together under the duty to co-operate to determine how the shortfall will be overcome, including considering whether a review of the Local Plans is needed. The Councils have committed through the City Deal to start the preparation of a joint plan in 2019.

Consideration of Alternatives / Not Demonstrated/ Unable to be Achieved in South Cambridgeshire

The consequences of not endorsing the joint trajectory could be significant. For South Cambridgeshire to provide a 5 year supply alone, it would need to identify a significant number of additional homes that could be delivered in the next 5 year period. It is most likely given the nature of the district that the majority of these would have to be in villages, as urban extensions or new settlements would require more planning and infrastructure. It would be contrary to the submitted sustainable development strategy to provide a significant number of additional sites in the villages, which are at the bottom of the development sequence, to enable South Cambridgeshire to demonstrate a five year supply simply due to the way that the major developments on the edge of Cambridge are being delivered on the ground. Sites in villages are likely to be the only locations where development is likely to be capable of being delivered within the early years of the plan period



and therefore contribute to the five year supply. In preparing the Local Plans, the Councils considered alternative options for the development strategy, including village focussed strategies. The analysis of alternatives is set out in the draft final Sustainability Appraisal Report<sup>8</sup> (see Part 3 Appendix 4). The submitted plan includes an element of housing in the rural area as part of a balanced development strategy, including allocation of 2,066 dwellings in the rural area and villages (excluding Cambourne West). It would not be part of a sustainable development strategy to provide significantly higher levels of development at villages when suitable sites higher up the development sequence are coming forward for development but that the phasing of those major sites on the edge of Cambridge means that they are providing an oversupply in Cambridge and an undersupply in South Cambridgeshire, simply because of the way those sites are building out from the edge of Cambridge, towards but not yet over the administrative boundary into South Cambridgeshire.

South Cambridgeshire has demonstrated in the housing trajectory included in the Councils' Housing Land Supply Update 2015 (RD/MC/050) that it can deliver its full objectively assessed need. However due to the phasing of delivery, the Council is unable to demonstrate that it has a five year supply in the early years of the plan period using either the Sedgfield methodology or a 20% buffer. The Councils do not accept that this is the appropriate approach to calculating 5 year supply pending the Inspectors' conclusions but have calculated 5 year supply on all methods and buffers, including Sedgfield and 20% as the most onerous. The MoU ensures that the Councils can demonstrate a five year supply and is a logical step towards a joint Local Plan.

Cambridge has also demonstrated in the housing trajectory included in the Councils' Housing Land Supply Update 2015 (RD/MC/050) that it can deliver its full objectively assessed need.

Cambridge currently has a housing land supply of 14,682 homes. This is being delivered in both the urban area and within urban extensions on the edge of city. Towards the end of the plan period, allocations within the urban area are expected to continue to come forward to meet objectively assessed need.

Undersupply position is worsening / No action to boost supply

There has been an increase in the number of dwellings completed in the Greater Cambridge area in the last two years, and individually within the two local authorities, compared to the first two years of the plan period. In 2014-2015, 1584 dwellings were

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<sup>8</sup> Draft Final Sustainability Appraisal Report (RD/Sub/SC/060)

completed in Cambridge and South Cambs. The Councils are working with landowners / developers to bring forward sites allocated in the adopted Local Plans and also submitted Local Plans. For example, planning permission for 82 dwellings has already been granted for the proposed allocation at Melbourn and construction has started, and initial discussions have been undertaken with the landowners / developers of other sites in the Plan. The lack of a five year supply is resulting in speculative planning applications in South Cambs, and permission has been given for 582 dwellings on 'five year supply sites', all of which are anticipated to be completed in the 2015-2020 five year period. Of these 511 dwellings are already included in the housing trajectory, including outline planning permission for 220 dwellings at the former CEMEX site in Barrington.

Housing Trajectory is Over Optimistic / Alternative Housing Trajectory and Five Year Supply Provided

The Councils undertake a review of the housing trajectory on an annual basis and have considered the delivery of individual sites in consultation with the agents / developers / landowners responsible for the sites. The housing trajectory is informed by the latest information on the delivery timetable, deliverability, availability and achievability of each site. In response to the current issue of lack of a 5 year supply, and in order to limit the risk of that situation reoccurring once the Local Plan is adopted, the Council has taken a more cautious approach than previously in the latest review of the housing trajectory, particularly in the delivery assumptions for new settlements. The housing trajectory is not considered to be over optimistic.

The Critique of Housing Land Supply undertaken by Bidwells includes an alternative housing trajectory for South Cambs where:

- Cambourne West and Bourn Airfield New Village have a combined annual completions of no more than 250 dwellings,
- the delivery of the Fulbourn & Ida Darwin Hospitals site starts a year later than proposed by the Council, and
- no windfall allowance is included in within the five year supply period.

The housing trajectory is considered robust and realistic. Issues relating to the delivery rates for the major sites are addressed under modification PM/SC/2/R.

As set out in the Councils' Housing Land Supply Update 2015 (RD/MC/050, pages A103-103), the Council has taken a more cautious approach for the timetable for the delivery of the Fulbourn & Ida Darwin Hospitals site than had previously been anticipated

by the agent, reflecting that a planning application was refused for the site in 2014 and that the applicant is undertaking further work on developing a suitable scheme.

The NPPF (paragraph 48) states that local planning authorities can make an allowance for windfall sites within their five year supply if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. The Councils' Matter 8 hearings statement sets out an analysis of historic windfall completions and as a result the Council has assumed that no more than 200 dwellings will be completed a year on windfall sites. The housing trajectory does not include a windfall allowance for the first three years of the five year period as identified windfall sites are anticipated to deliver over 200 dwellings a year. For the last two years of the five year period, a windfall allowance is included that together with the predicted completions on identified windfall sites (excluding 'five year supply sites') does not exceed 200 dwellings a year. Including a windfall allowance within the five year period is consistent with the NPPF. It should be noted that no allowance is made for further windfalls that may come forward as a result of a lack of 5 year housing land supply pending resolution of that issue through the Local Plan examination.

Dwellings on Policy H/1b Sawston

As set out in the Councils' Housing Land Supply Update 2015 (RD/MC/050, paragraph 3.12), the Council has taken a cautious approach to the latest housing trajectory. Therefore until the capacity of the site has been considered through the Local Plan or a planning application has been determined, the Council is only relying on the site to provide the notional capacity of 80 dwellings as set out in Policy H/1b. The commentary to the housing trajectory in Appendix 4 of the Councils' Housing Land Supply Update 2015 (RD/MC/050, page A107) makes it clear that the agent anticipates that the site will be able to accommodate a higher number of dwellings. Policy H/1 also states that the number of homes granted permission on a site may be higher or lower than the indicative capacity stated in the policy and that this will be determined through a design-led approach. Any provision above the notional capacity will provide additional flexibility to the Councils' housing supply.

Note: Infrastructure for Waterbeach New Town and Bourn Airfield New Village is addressed under modification PM/SC/2/N.

Note: Issues regarding the development strategy are addressed under modification PM/SC/2/N.

	<p><u>Note:</u> Adding reference to a Local Plan Review is addressed under the assessment of PM/SC/2/R.</p> <p><u>Note:</u> Issues regarding over reliance on strategic sites for delivery are addressed under modification PM/SC/2/N.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/B to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/C</b>			
<b>Add new paragraph to paragraph 2.17, 3<sup>rd</sup> bullet point</b>			
<b>Representations Received</b>	Support: 7	Object: 20	Total: 27
<b>Main Issues</b>	<p><b><u>General Issues:</u></b></p> <p><b><i>Supports:</i></b></p> <ul style="list-style-type: none"> <li>• Supports the assessment of the Green Belt which confirms the need to continue to protect the Green Belt.</li> <li>• Raised substantive concerns about the previous inner Green Belt review on the grounds that the assessment criteria did not conform to the NPPF, the lack of transparency, and poor consistency in the outcome. The 2015 study effectively answers these concerns and provides a sound basis for spatial planning of the housing requirement for Greater Cambridge.</li> <li>• The modifications have given consideration to protecting Fulbourn's Green Belt keeping Fulbourn a village in its own right not just an extension of Cambridge.</li> </ul> <p><b><i>Objections:</i></b></p> <ul style="list-style-type: none"> <li>• The Green Belt is the over-arching principle guiding the development strategy of the Local Plans, with the delivery of sustainable development having only a secondary role which is an approach that is contrary to the National Planning Policy Framework (NPPF).</li> <li>• The Green Belt has been incorrectly treated as a near absolute constraint, when it is a planning policy tool which can and should be varied to meet development needs.</li> <li>• A proper assessment of safeguarded land has not been undertaken, and none of the Green Belt studies including the Inner Green Belt Review 2015 have considered this matter. Land at Cambridge East has been identified as safeguarded land without any assessment as to whether it will be available for development after 2031. Furthermore, no additional or alternative land has been considered or assessed as potential safeguarded land for housing or employment. If sufficient land has not been identified to meet development needs, proposed Green Belt boundaries will need to be altered at the end of the plan period.</li> </ul>		

	<ul style="list-style-type: none"> <li>• In order to respond to the Inspectors' questions the authors of the review would have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so by adding additional assessment criteria, assessing the relative benefits of all criteria and areas of Green Belt, estimating the cost of Green Belt loss against new settlement creation (cost-benefit analysis), and analysing the adverse impacts of new settlement creation in terms of transport and infrastructure'.</li> <li>• The new evidence and Main Modifications fail to properly address the Inspector's' concerns of the original work related to the review of the Inner Green Belt Boundary (2012), in particular the clarity of the Green Belt Review methodology, and the role of the Sustainability Appraisal/Strategic Environmental Assessment process.</li> </ul> <p><b><u>Objections regarding the methodological approach to the 2015 Green Belt Study:</u></b></p> <p><b>Green Belt Qualities and Purposes</b></p> <ul style="list-style-type: none"> <li>• The qualities selected for the Assessment Criteria do not cascade from current adopted policies and are not supported by full justification for inclusion. In addition the link between the qualities assessed and the Green Belt purposes in many cases are tenuous and indirect.</li> <li>• Accordingly the assessment falls short of being able to draw conclusions on Green Belt and potential Green Belt effects and appears to be more of a landscape appraisal / assessment of key landscape and environmental characteristics.</li> <li>• The 2012 and 2015 studies suffer from an incorrect interpretation and analysis of some of the criteria against the purposes of Green Belt and the weighting given to the criteria.</li> </ul> <p><b>Measurable Thresholds</b></p> <ul style="list-style-type: none"> <li>• There is a lack of measureable thresholds and criteria which would allow for the process to be replicated and verified by other appropriately qualified professionals.</li> <li>• The 2015 Study states in its methodology that it does not employ a scoring system to assess land. However, we would disagree with this since land is divided according to the role and function of the green belt and is placed into categories based upon its contribution to the distinctiveness of Cambridge and its setting. A ranking system does, therefore, exist.</li> </ul> <p><b>Assessment Parcels</b></p> <ul style="list-style-type: none"> <li>• The use of large and inconsistent assessment parcels in undertaking this exercise has resulted in an assessment with different findings than if smaller parcels had been used.</li> </ul>
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**Inconsistencies between 2012 and 2015 Green Belt Studies**

- 2012 Green Belt Study now appears to have been ‘abandoned’, rather than corrected and explained.

**Objections regarding specific sectors within the 2015 Green Belt Study:**

**Sector 1: East of Huntingdon Road**

- The Green Belt Study has not properly analysed the capacity of the Green Belt within the North West quadrant of Cambridge at land between Huntingdon Road and Histon Road to accommodate additional development, indicating a proposed revised boundary.

**Sectors 3 and 4: : North of Barton Road and South of Barton Road**

- The methodology adopted in the Inner Green Belt Review 2015 is not robust because of a bias on the issue of setting and an exaggeration of ‘unspoilt’ views from the west towards the historic core of the City. Land to the North of Barton Road should be released from the Green Belt, and allocated as a strategic housing site and land South of Barton Road should be released from the Green Belt and safeguarded to meet development needs beyond the plan period.

**Sector 7: : South west of Trumpington**

- The Green Belt Study is not an appropriate evidence base and does not overcome issues identified at the EiP. As part of reviewing the Green Belt Study, a number of concerns relating to the methodology have been determined that skew the results for Sector 7 (around Trumpington Meadows). The assessment of Sector 7 is not appropriate.

**Sector 8: Cambridge South – land west of Cambridge Road**

- The LDA Study says it does not sub divide the sub areas. However, sub-area 10.2 to the south of Addenbrooke’s Hospital (a smaller parcel of land than 8.1) is further sub-divided, allowing the identification of a sub-parcel of land (identified as site E/1B in the Proformas) which LDA Design say could be released from Green Belt. The starting point of any release of the Green Belt should be its importance to the purpose of the Green Belt. LDA Design describe area 10.2 as a single entity within a sector which plays “a key role in the setting of the south of Cambridge, forming the most westerly extent of the foothills of the Gog Magog Hills, which form the backdrop to all views out from and across Cambridge in this direction” and yet reach a conclusion that with green buffers and restriction of

	<p>development to relatively flat ground the sub-parcel to the north of sub-area 10.2 could be released from the Green Belt. This proposition equally applies to area 8.1 (Cambridge South). With certain parameters for Green Belt release in place, development could be undertaken in Sector 8.1 without significant harm to Green Belt purpose.</p> <ul style="list-style-type: none"> <li>• Detailed criticism in terms of individual qualities applied to Sector 8.</li> <li>• The conclusion of the 2015 study that Sector 8.2 (Site 18 within the Sustainability Appraisal/Site 005 of the South Cambridgeshire Strategic Housing Land Availability Report) is no longer open in a visual sense and contributes little to contribution to the Green Belt is the same as those reached by the authorities in earlier studies. This site does not contribute to 'checking the unrestricted sprawl of Cambridge' which objective is clearly served by the wider Green Belt area in this location. As such, the text of the proposed modification is inaccurate and does not properly reflect the conclusions as stated within the Council's own evidence in respect of the site at Great Shelford.</li> <li>• In order to properly reflect the conclusions in respect of the land off Cambridge Road, Great Shelford (Sector 8.2), we propose that the text should be amended and land off Cambridge Road, should be removed from the Green Belt.</li> </ul> <p><b>Sector 9: Hobson's Brook Corridor</b></p> <ul style="list-style-type: none"> <li>• Sector 9.1 fails to give any consideration to Scotsdales Garden Centre. The site does not contribute to Green Belt purposes listed in paragraph 80 of the NPPF and should be removed from the Green Belt.</li> <li>• Land off Cabbage Moor in Great Shelford should have been released for development. The Inner Green Belt Review did not assess sites on the edge of villages, including Great Shelford. The site is not part of the wider landscape but is related to the urban area. The land to the north was previously released from the Green Belt and is currently being developed. The development would have no adverse impact on the compactness or setting of Cambridge and would not lead to the merging of villages. Landscape improvements could be undertaken to protect the special character of Cambridge and its setting.</li> </ul> <p><b>Sector 10: : South of Addenbrooke's</b>  <u>Note:</u> for other non-Green Belt issues on Sector 10 see modification PM/SC/8/A.</p> <ul style="list-style-type: none"> <li>• Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land</li> </ul>
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	<p>from the Green Belt.</p> <ul style="list-style-type: none"> <li>• The modification is not justified and is against the Green Belt policy, as the arguments about the value of this land to the Green Belt given in the Inner Green Belt Review 2015 are flawed and the Council has failed to demonstrate that there are exceptional circumstances for the need for jobs at this location.</li> <li>• The Inner Green Belt Review 2015 includes Nine Wells (Sector 10) and states that this sector enhances the setting of Cambridge and gives a rural setting to the South whilst new developments in the North create sense of encroachment into the countryside. The sector is of historic and ecological importance. No justification has been made for further release of Green Belt land in this sector.</li> </ul> <p><b>Sectors 11, 12 and 13: West of Limekiln Road, South East Cambridge, and South of Fulbourn</b></p> <p><u>Note:</u> Amendment to boundary of GB2 is addressed under modification PM/CC/2E.</p> <p><u>Note:</u> Deletion of GB1 and GB2 is addressed under modification PM/CC/2/G.</p> <p><u>Note:</u> Policy E/2 Fulbourn Road East is addressed under modification PM/SC/8/C.</p> <p><b>Significant expansion of GB1 and GB2</b></p> <ul style="list-style-type: none"> <li>• <b>CEG</b> Failure to interpret the Green Belt Review correctly such that the Green Belt boundaries proposed for GB1 and GB2 are not supported by the evidence base. Within the parameters of the Council's own assessment, the two allocations could be extended eastwards to provide a sustainable urban extension of 1,260 new homes with extensive community facilities – this would be in line with the Plans' development sequence without giving rise to harm to the Green Belt as defined by the Councils' new Green Belt review. Such an increase could either help meet an increase in the housing requirement and/or replace a less sustainable form of development lower down the development sequence.</li> <li>• Land to the north of Babraham Road, west of Cherry Hinton Road/Limekiln Road and south of Worts' Causeway is released from the Green Belt and identified as a strategic site allocation.</li> </ul> <p><b>Safeguarding of land put forward by CEG</b></p> <ul style="list-style-type: none"> <li>• Need for the modification of the Green Belt to identify safeguarded land elsewhere within land at South East Cambridge to ensure that the Green Belt boundaries are secure beyond the Plan Period.</li> </ul>
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	<p><b>Release of land in Sector 13: South of Fulbourn</b></p> <ul style="list-style-type: none"> <li>The following two sites in Sector 13 should be released from the Green Belt and allocated for development or identified as safeguarded land to meet long term development needs: <ol style="list-style-type: none"> <li>Land at Fulbourn Old Drift (south of Cambridge Road and north of Shelford Road), Fulbourn (SHLAA Ref. 037) – for residential development;</li> <li>Land north of Cambridge Road, Fulbourn (SHLAA Ref. 038) – for employment uses providing an extension to Capita Park.</li> </ol> </li> </ul> <p><b>Sector 14: East of Cherry Hinton</b></p> <ul style="list-style-type: none"> <li>More sustainable sites should be released, including land between Teversham and Cherry Hinton Road/Airport Way.</li> </ul> <p><b>Sectors 18 and 19: Eastern Side of Fen Ditton and West of Fen Ditton</b></p> <ul style="list-style-type: none"> <li>Disagreement with the assessment of Sectors 18 and 19 within the Green Belt Study in relation the level of Green Belt importance attached to the land promoted by <b>The Quy Estate</b>. It is a broad brush judgement that states for both Sectors 18 and 19, that is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes. It does not state which Green Belt purpose or purposes it alleges is compromised or affected as there is no Purposes assessment. It does not state whether “substantial harm” is caused by an effect on one Green Belt Purpose (if so which Purpose), more than one Purpose or perceived effects on all the Purposes. It does not state what is meant by “substantial harm”.</li> <li>Site at land east of Horningsea Road, Fen Ditton (SHLAA Ref. SC036 – Broad Location 9) for residential development should be released from the Green Belt and allocated for development or identified as safeguarded land to meet long term development needs.</li> </ul> <p><b>Land outside the scope of the Green Belt Study</b></p> <ul style="list-style-type: none"> <li>A site at land west of A10, Milton (SHLAA Ref. 327) – for employment/sui generis uses should be released from the Green Belt and allocated for development or identified as safeguarded land to meet long term development needs.</li> <li>ByPass Farm, West of Cottenham Road, Histon - In previous submissions, Histon and Impington Parish Council had recorded a willingness of the County Council's Farms Estate to consider leasing the site to the Parish Council for recreation purposes. This offer has now been withdrawn. The Parish Council therefore wishes to remove the reclassification of this land as recreation space. It should remain as Green Belt.</li> </ul>
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	<ul style="list-style-type: none"> <li>• The Green Belt boundary should be reassessed around the Rural Centres, including Histon, in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs. We request that land west of 113 Cottenham Road in Histon is released from the Green Belt and is specifically allocated in Policy H1 and included within the housing trajectory.</li> <li>• Taking into account the implementation of a new substantial landscape structure, the overall contribution that the Land at Mingle Lane, Great Shelford makes to Green Belt is limited to none at both a national and district level. It should be released for residential purposes.</li> </ul>
<p><b>Councils' Response</b></p>	<p><b><u>General Issues</u></b></p> <p><b><i>Supports:</i></b> Support noted.</p> <p><b><i>Objections:</i></b>  <b>Green Belt treated as an absolute constraint</b>  The Councils have not treated Green Belt as an absolute constraint. The specification for the LDA Design Study expressly excluded the assessment of Green Belt in the context of NPPF paragraph 85 and how Green Belt is addressed in the SA/SEA process in response to NPPF paragraph 84. This is referenced at paragraph 2.6 of the Councils' specification for the Inner Green Belt Boundary Study as provided in the Councils' letter of 28 September 2015 to the Inspectors. The LDA Design Study therefore does not address these issues. The Councils have taken the LDA Design Study and weighed it alongside other evidence and technical reports to reach conclusions as to their development strategy (see Part 3 of the Councils' Development Strategy Update (RD/MC/060)).</p> <p>The Study forms part of a wider evidence base that when taken together responds to the requirements of paragraphs 84 and 85 of the NPPF to take account of sustainable patterns of development and informed decision making. This includes a Sustainable Development Strategy Review, transport modelling and SHLAAs, which themselves informed comprehensive Sustainability Appraisals as an iterative process throughout plan-making. The Councils have also undertaken further Sustainability Appraisal work to address the issues raised in the Inspectors' letter of 20 May 2015.</p> <p>The NPPF at paragraph 84 requires that promoting sustainable patterns of development and considering the consequences for sustainable development of channelling development to locations outside the Green Belt should be "taken into account" when</p>

reviewing Green Belt boundaries. It is not an overriding consideration. Neither should sustainability be understood only to refer to movement and access matters. The NPPF is clear that there are three dimensions to sustainable development: economic, social and environmental (paragraph 7), and in paragraph 6 states that the NPPF policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view on what sustainable development means in practice for the planning system. These policies include: paragraph 30 which gives encouragement to sustainable transport solutions to reduce greenhouse gas emissions and in the preparation of Local Plans, local planning authorities are told to support "a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport", and include the policies dealing directly with the Green Belt in paragraphs 79 to 92. Green Belt protection is clearly part of the Government's policy to deliver sustainable development, as is the release of Green Belt land for development through Local Plan preparation where appropriate to do so.

The development strategy policies of the Local Plans provide for a sustainable pattern of development with the majority of development focused in and on the edge of Cambridge as the first and second preferences. The spatial strategy and the appropriate balance between Green Belt and other sustainability factors were considered in the Councils' Matter 2 statement. The sustainability merits of all proposed development sites including those adjoining the inner Green Belt boundary have been assessed and have been properly taken into account in reaching a view on the appropriate balance between protecting Green Belt and delivering new homes and jobs at the top of the development sequence.

Note: also refer to the assessment at PM/SC/2/N.

### **Safeguarded Land**

The issue of safeguarding / permanence has already been considered at the Matter 6iii Local Plan hearings in 2015.

This is a matter that arises under NPPF paragraph 85 and is therefore outside the scope of the LDA Design Study.

The inner Green Belt boundary has been heavily scrutinised since 2000, and very significant Green Belt releases made between 2006 and 2010. These are sufficient in total to accommodate 22,000 new homes, the long term growth of Cambridge University and the creation of what will be a world class Biomedical Research Park at Addenbrooke's (Cambridge University Hospitals). Apart from some small scale non-strategic sites proposed for release as

part of the current Local Plans, all of the major sites which could be developed without significant harm to Green Belt purposes in the foreseeable future have already been released for development. On this basis there is no scope for any future strategic Green Belt releases unless significant harm to the Green Belt purposes was to be accepted which would not be consistent with policy or the conclusions of the development strategy review.

Extensive land at Cambridge East is safeguarded for longer-term development after 2031. This site was removed from the Green Belt between 2006 (Cambridge Local Plan) and 2008 (Cambridge East AAP) when it was envisaged that Cambridge Airport would relocate and a major new urban quarter would be created. The relocation of the airport is now not expected within the plan period. It is a developable site with the benefit of an adopted AAP. It is flat, and is not at risk of flooding. Neither the NPPF nor the NPPG require safeguarded land to be deliverable. This area would provide a good location for sustainable development if it came available at some point in the future. As noted in our Matter 6A i statement, the remaining safeguarded land has a capacity of between 8,000 and 10,000 homes based upon the assumptions in the adopted Cambridge East AAP.

#### **Cost-Benefit Analysis of Green Belt**

The Councils consider that the findings of the LDA Design Study have been considered together with other evidence base documents, including the Councils' updated Sustainability Appraisal Addendum. The Sustainability Appraisal Addendum identifies the impacts of the different strategy choices. Informed by this, the Councils have identified the preferred approach and the reasons for this approach.

#### **Failure to address Inspectors' concerns**

The Councils consider that the new Green Belt Study and the Sustainability Appraisal address the Inspectors' concerns as expressed in their letter of 20 May 2015.

#### **Objections regarding the methodological approach to the 2015 Green Belt Study:**

##### **Green Belt Qualities and Purposes**

As noted at paragraph 2.2.7 of the LDA Design Study, the development of the Cambridge Green Belt purposes is described in Appendix 6 to the Councils' Joint Matter Statement on Matter 6. The Matter Statement refers to paragraph 8.10 of the Structure Plan EiP Panel Report, which states that 'in the case of Cambridge it only has a Green Belt because it is a historic city. It follows that all five purposes of Green Belts as set out in paragraph 1.5 of

	<p>PPG2 are not necessarily relevant to this Green Belt.’ The EiP Panel endorsed the Cambridge Green Belt purposes, which were stated in the Structure Plan and primarily relate to the character and setting of Cambridge and preventing the merging of settlements and thus focus particularly on only two of the five National Green Belt purposes. In relation to National Green Belt purpose 4 (setting and special character), the PAS Green Belt document (Planning on the Doorstep: The Big Issues – Green Belt, 2014) states ‘This purpose is generally accepted as relating to very few settlements in practice’, confirming that the Cambridge Green Belt differs from most other Green Belts in this respect.</p> <p>It is therefore clear that it is not necessary for land within Green Belt to perform all five of the Green Belt purposes laid down in NPPF paragraph 80. In turn, it follows that the importance of a particular area of land to Green Belt is not determined by the number of Green Belt purposes it performs. Methodologies that assess areas of land against a range of Green Belt purposes and rank land according to how many purposes it performs are therefore flawed. Since Cambridge ‘only has a Green Belt because it is a historic city’ (Structure Plan EiP Panel Report paragraph 8.10 as above), an area of land that plays a key role in relation to the setting of Cambridge could be highly important to retain as Green Belt even if it performed no other Green Belt purpose.</p> <p>Green Belt purposes are concerned with concepts that are somewhat esoteric or abstract, such as ‘unrestricted sprawl’, ‘encroachment’, ‘setting’ and ‘special character’. It is not possible to make any meaningful assessment against the purposes without first defining what is meant by these terms and specifically identifying the particular qualities of Cambridge and its surrounding landscape that contribute to the performance of Green Belt purposes. The LDA Design Study did this in two ways:</p> <ol style="list-style-type: none"> <li>1. Reviewing the qualities that had been identified in previous studies and policy documents (section 2.3 of the LDA Study).</li> <li>2. Undertaking extensive baseline studies and analysis as described in section 4.0 of the LDA Study and summarised in section 4.15.</li> </ol> <p>In these two ways, the 16 qualities used as criteria for the assessment were identified. The 16 qualities are described fully in section 5.2 of the report. The first paragraph of the description of each quality explains the relevance of the quality by reference to Green Belt purposes and qualities identified in previous studies and policy documents. Each of the qualities is therefore clearly founded in Green Belt purposes and the summary table on pages 59-60 shows that all 16 qualities have a relationship to at least one</p>
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of the National Green Belt purposes and all qualities except no. 10 have a relationship to at least one of the Cambridge Green Belt purposes. Conversely, at least two qualities are identified as being relevant to each of the National Green Belt purposes and Cambridge Green Belt purposes.

Some of the Representations from objectors argue that because the number of qualities relevant to each Green Belt purpose varies, there is an inherent bias in the LDA Design Study (see for example, CSA Environmental paragraph 2.16 and The Landscape Partnership paragraph 4.31). This is not the case because the LDA Design Study does not assess the importance of areas of land by virtue of the number of Green Belt purposes they perform or the number of qualities they exhibit. For the same reason, the fact that some qualities relate to more than one purpose does not mean there is any double counting in the assessment.

With the exception of National Green Belt purpose 5, the LDA Design Study takes full account of all National Green Belt purposes and Cambridge Green Belt purposes. National Green Belt purpose 5 was scoped out, as described at paragraph 2.2.5 of the LDA Design Study. The PAS Green Belt document (Planning on the Doorstep: The Big Issues – Green Belt, 2014) confirms the validity of scoping out National Green Belt purpose 5, stating ‘If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose’. The LDA Design Study’s compliance with PAS advice is raised in the Representation by Grosvenor. The criticism appears to be that the LDA Design Study does not assess land parcels against specific Green Belt purposes. The text within the PAS document on which Grosvenor relies states ‘*Any review of Green Belt boundaries should involve an assessment of how the land still contributes to the five purposes ...*’. The LDA Study assesses the performance of land parcels against Green Belt purposes by means of the 16 qualities. There is no suggestion in the PAS guidance that the LDA Design approach is invalid.

#### **Measurable Thresholds**

It is not necessary for land within Green Belt to perform all five of the Green Belt purposes laid down in NPPF para 80. In turn, it follows that the importance of a particular area of land to Green Belt is not determined by the number of Green Belt purposes it performs. Methodologies that assess areas of land against a range of Green Belt purposes and rank land according to how many purposes it performs are therefore flawed. Since Cambridge ‘only has a Green Belt because it is a historic city’ (Structure Plan EiP Panel Report paragraph 8.10 as above), an area of land that plays

	<p>a key role in relation to the setting of Cambridge could be highly important to retain as Green Belt even if it performed no other Green Belt purpose. Scoring land parcels on the basis of the number of Green Belt purposes they perform or the number of qualities they exhibit is a flawed approach.</p> <p>At the end of each sector assessment in the LDA Study, under the heading ‘Importance of the Sector to Green Belt Purposes’ the Study identifies the qualities which are most relevant to the sector and sub-areas, on which the assessment of importance is primarily based. In most cases, one or two particular qualities are of most relevance but the qualities differ from one sector to another. For example, particular qualities in sector 3 are the presence of open countryside close to the city centre, ensuring that the city remains compact and that the historic core remains large in comparison to the size of the city as a whole. In sectors in the south-east of the city, topography is of particular relevance, with the Gog Magog Hills forming a key component of the setting of the city and their foothills forming the backdrop in views out from and across Cambridge. In various other sectors, Green Belt land plays a key role in maintaining separation between Cambridge and the necklace villages.</p> <p>In each of the above examples, land in the sectors is important to Green Belt purposes primarily because of the qualities stated. However, it is not possible to compare the importance of one quality on one side of the city with another quality on another side of the city. Any such comparison, or any weighting of criteria to enable such a comparison, would be entirely subjective. The intention in the LDA Design Study was to take an objective approach. In analysing the complex issues raised by Green Belt purposes, baseline information must be assessed and professional judgement must be exercised to arrive at robust and justifiable conclusions which can be relied on to inform the Local Plan process. The need for professional judgement cannot be avoided and does not mean that the assessments are subjective in the sense that they are merely one person’s opinion and another person might have a different opinion. In the case of professional judgement, another experienced professional applying the same methodology could be expected to reach similar conclusions.</p> <p><b>Assessment Parcels</b></p> <p>The main criticism raised by objectors in relation to land parcels relates to the size of sub-areas used for the assessment. The issues raised by Green Belt purposes and by the 16 qualities identified in the LDA Design Study are broad scale issues that are most appropriately considered in relation to areas of land at a relatively broad scale. Where an area of land forms a particular</p>
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	<p>role in relation to the setting of the city, that role is very unlikely to stop abruptly, for example at a field boundary, so that one field can be assessed as performing the role in question and the next field can be assessed as not performing it. Rather, the performance of the role is likely to gradually increase or reduce across an area of landscape, with no clear boundary where the role starts to be performed. Assessing larger parcels of land enables this transition to be noted and taken into account. Dividing land into smaller parcels, particularly when associated with a scoring system that ranks parcels in relation to the number of Green Belt purposes or criteria they meet can lead to a suggestion that certain parcels are of lesser importance to Green Belt purposes and should therefore be released for development. However, such a fine-grained approach does not allow for any assessment of the effects of the development of one land parcel on adjacent parcels, which might be diminished in terms of their performance of Green Belt. The effects of the release of a small parcel of land for development can therefore be greater than the loss of that parcel's contribution to Green Belt purposes.</p> <p>The approach taken in the LDA Design Study of assessing broader parcels of land which are consistent in land use, character and context enables such broader effects to be taken into account in considering the implications of the release of land from Green Belt for development.</p> <p>Some of the Representations criticise the classification of Townscape and Landscape Role and Function in certain locations, e.g. the Landscape Partnership para 4.29, which suggests that the University's West Cambridge site should be classified as Supportive rather than Distinctive. The justification for LDA Design's classification of West Cambridge is at para 4.14.12 of the LDA Design Study.</p> <p>At para 3.3 of the Pigeon report, it is suggested that the LDA Design Role and Function classification is a quasi-scoring system. This is not correct. The classification (known as the Winchester Methodology) is a method of identifying areas of townscape and landscape that play a greater or lesser role in defining or supporting the distinctiveness of a historic city and its setting. If taken on its own, it could be used as a crude scoring system (Distinctive areas being more 'important' than Supportive areas) but the LDA Design Study does not use it in this way. Rather, the classification is one of the qualities used to enable the assessment of the performance of areas of Green Belt.</p> <p>Some representations from interested parties suggested that, in considering the implications of Green Belt release for development</p>
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in each sector, the Study only considered development of the entire sector or sub area in question and did not consider development in only part of a sector or sub area. This was not the case, as evidenced by the identification of the potential to release land for development in parts of certain sub areas, for example in sectors 10-13. However, the use of the word 'remove' in some instances may have given a misleading impression. Amendments are proposed to relevant paragraphs of the Study to improve clarity within the Supplement to the LDA Design Study (RD/MC/031).

**Inconsistencies between 2012 and 2015 Green Belt Studies**

Following the Inspectors' letter of 20 May 2015, the two Councils commissioned LDA Design to specifically address the concerns about the Green Belt methodology raised in the Inspectors' preliminary conclusions letter. This involved undertaking the following:

- Assessment of the Inner Green Belt Boundary and set out the methodology used. The assessment should provide a robust, transparent and clear understanding of how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt.
- Review the methodologies put forward by objectors in relation to the Inner Green Belt Boundary.

The LDA Design Study is an independent assessment of the Inner Green Belt Boundary in relation to the purposes of the Cambridge Green Belt. It is not intended to be consistent with the Councils' 2012 Study, although it is noted to have largely consistent findings.

**Objections regarding specific sectors within the 2015 Green Belt Study:**

**Sector 1: East of Huntingdon Road**

The explanation for limiting the further release of land from the Green Belt in sub area 1.3 is given at paragraph 6.4.5 of the LDA Design Study. If additional land is released and developed as proposed in the report by The Landscape Agency, it will significantly reduce the perception of open rural landscape between Cambridge and the A14 and will therefore significantly compromise the setting of the city.

**Sectors 3 and 4: : North of Barton Road and South of Barton Road**

As set out in response to other representations, National Green Belt purpose 4, to preserve the setting and special character of historic towns, is of particular relevance to Cambridge. It is unsurprising and entirely justified that the majority of the qualities identified in section 5.0 of the LDA Design Study relate to setting

and character (although many of them also relate to other purposes). There is no inherent bias in the LDA Design Study as a result of the number of qualities relevant to each Green Belt purpose varying, because the LDA Design Study does not assess the importance of areas of land by virtue of the number of Green Belt purposes they perform or the number of qualities they exhibit. For the same reason, the fact that some qualities relate to more than one purpose does not mean there is any double-counting in the assessment.

In terms of the alleged 'exaggeration of unspoilt views' from the west, there is no suggestion in the LDA Design Study that the construction of the M11 and other modern development has not changed these views. However, paragraph 5.2.32 of the LDA Design Study states that, because development has been limited on the west side of the city, the quality of views of that side of the historic city, with open countryside and a soft green edge, and landmark historic buildings clearly visible and largely unaffected by modern development, has remained substantially intact over the last 300 years.

The explanation for identifying no potential for release of land from the Green Belt in sector 3 is given at paragraph 6.6.5 of the LDA Design Study. Any development would remove the characteristic setting of the city, diminish (both in reality and in perception) the presence of countryside close to the distinctive core of Cambridge and obstruct key views.

The explanation for identifying no potential for release of land from the Green Belt in sector 4 is given at paragraph 6.7.5 of the LDA Design Study. Any development on land South of Barton Road would severely compromise the separation between Cambridge and Grantchester, and would both remove the characteristic setting of the city and obstruct key views.

#### **Sector 7: South west of Trumpington**

As stated at paragraph 6.10.2 of the Study, the whole sector is currently in a state of change due to the new residential development at Trumpington Meadows. Within the Study, sector 7 is treated as a single area, due to the similar contribution to Green Belt purposes across different land uses within the sector.

However, as there are some slight differences between the area laid out as a country park and that returned to agricultural use, it is proposed to divide the sector into two sub areas. Amendments to Figure 2 to show the extent of the sub-areas and to the text within the assessment of sector 7 are provided in the Supplement to the LDA Design Study (RD/MC/031).

	<p>Justification of the classification of land within sector 7 as Supportive landscape is provided at criterion 8 of the assessment table on page 112 of the LDA Design Study. The objection by Grosvenor suggests that there is a contradiction within the assessment of sector 7, whereby the conclusions indicate the sector is important to the character of the approach to Cambridge, but the assessment under criterion 3 states that there is little contribution to the approach to the historic core. This is a misunderstanding, as the approach to the historic core is not coincidental with the approach to the city as a whole in the vicinity of sector 7.</p> <p>The objection queries the conclusion of the assessment of sector 7 that it ensures the expansion of the city does not continue unchecked and that the historic core remains large in comparison to the size of the city. The assessment of criteria 1, 2 and 3 in particular address why this is important for sector 7, with development to the south west of the city historically having been relatively limited, unlike other areas referenced by Grosvenor.</p> <p>In relation to the assessment of criterion 12, the assessment is factual in that sector 7 forms part of the physical separation between Cambridge and the villages of Grantchester and Hauxton. The development at Trumpington Meadows, Glebe Farm and Clay Farm has extended the edge of Cambridge since many of the previous studies. The reference to separation between the M11 and the edge of the city within the LDA Design Study relates to the setting of the city, rather than relating to the prevention of settlements merging.</p> <p><b>Sector 8: Cambridge South – land west of Cambridge Road</b>  There are no issues raised which would give rise to alteration to the LDA Design Study. South Cambridgeshire District Council would only seek to release the land at sub-area 8.2 from the Cambridge Green Belt if it was to be allocated for development. There are other non-Green Belt issues which indicate that this allocation would not be appropriate or sound.</p> <p>It is correct to say that the LDA Design Study does not sub-divide the sub areas. Some areas have been identified within the study that, although important to the Green Belt, could accommodate some level of development without substantial harm to Green Belt purposes. Where such areas have been identified, parameters are provided for any such development to avoid significant harm to the purposes of the Green Belt. In relation to sub area 10.2, paragraph 6.13.5 of the LDA Design Study sets out the parameters for development and explains why it would avoid significant long-term Green Belt harm. In the case of sub area 8.1, paragraph 6.11.4</p>
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explains why no Green Belt release should be contemplated. The reasons stated could not be overcome by imposing parameters on development.

**Sector 9: Hobson’s Brook Corridor**

Edge of village sites were assessed in the LDA Design Study as part of the relevant sector or sub area in which they are located. Scotsdales Garden Centre and land at Cabbage Moor fall within sub area 9.1, as identified in the LDA Design Study. Sector 9 is considered in detail in section 6.12 of the LDA Design Study. Paragraph 6.12.5 of the LDA Design Study considers the implications of Green Belt release for development within Sector 9, stating that within the sector *“Development would reduce the separation between Cambridge and Great Shelford, as well as affecting the key approach into the city from the south and removing or impinging on a green corridor into the city. It would increase the risk of urban sprawl if development is extended into this sector in the future”*. As concluded in the LDA Design Study, no Green Belt release should be contemplated in this sector.

**Sector 10: South of Addenbrooke’s**

Note: for other non-Green Belt issues on Sector 10 see modification PM/SC/8/A.

Para 6.13.3 of the LDA Design Study confirms that the whole of sector 10 is important to Green Belt purposes, particularly in relation to the setting of the south of Cambridge, the prevention of urban sprawl and the prevention of coalescence between Cambridge and Great Shelford. Nevertheless, limited development in the northern and eastern parts of the sector could be undertaken without significant long-term harm to Green Belt purposes. Para 6.13.5 of the LDA Study provides the explanation for this and sets out parameters for any such development.

**Sectors 11, 12 and 13: West of Limekiln Road, South East Cambridge, and South of Fulbourn**

Note: Amendment to boundary of GB2 is addressed under modification PM/CC/2E.

Note: Deletion of GB1 and GB2 is addressed under modification PM/CC/2/G.

Note: Policy E/2 Fulbourn Road East is addressed under modification PM/SC/8/C.

**Significant expansion of GB1 and GB2**

The representation made on behalf of CEG in relation to land at South East Cambridge seeks to apply the parameters for Green

Belt release set out in relation to sector 11 to justify the release of a significantly greater extent of land than is proposed by Cambridge City Council's proposed allocations GB1 and GB2. The City Council's proposed allocations reflect a correct interpretation of the parameters whilst CEG's interpretation is incorrect. Whilst it is believed the parameters in the Study are clear, they have been reviewed in the light of CEG's misinterpretation and the amendments are proposed in the Supplement to the LDA Design Study (RD/MC/031) to add greater clarity.

**Safeguarding of land put forward by CEG**

The land within the South East Cambridge development proposal should not be released from the Cambridge Green Belt for allocation or as safeguarded land as this area plays a key role in the setting of the south east of Cambridge. The importance of sectors 11, 12 and 13 to the Green Belt purposes are addressed within the LDA Design Study.

**Release of land in Sector 13: South of Fulbourn**

Land at Fulbourn Old Drift forms the majority of sub area 13.1, as identified in the LDA Design Study. Sector 13 is considered in detail in section 6.16 of the LDA Design Study. Paragraph 6.16.6 of the LDA Design Study considers the implications of Green Belt release for development within sub area 13.1, setting out the parameters for a potential Green Belt release at the north west corner of sub area 13.1 adjacent to Peterhouse Technology Park. However, the Land at Fulbourn Old Drift lies outside this area and could not accommodate development without substantial harm to Green Belt purposes, for the reasons stated in paragraph 6.16.6. Land north of Cambridge Road, Fulbourn forms part of sub area 13.2, as identified in the LDA Design Study. Paragraph 6.16.5 of the LDA Design Study considers the implications of Green Belt release for development within sub area 13.2, stating that within this sub area any development would *"compromise the separation between Fulbourn and Cambridge, and impact on the relationship with the Fulbourn Hospital Conservation Area"*. As concluded in the LDA Design Study, no Green Belt release should be contemplated in this sub area.

**Sector 14: East of Cherry Hinton**

The land referred to falls across parts of sub areas 14.1 and 14.2, as identified in the LDA Design Study. Sector 14 is considered in detail in section 6.17 of the LDA Design Study. Paragraph 6.17.5 of the LDA Design Study considers the implications of Green Belt release for development within Sector 14, stating that within sector 14 *"any form of development would affect the separation between Cambridge and both Teversham and Fulbourn, as well as between the two necklace villages. It would also affect the rural setting of*

*the villages*". As concluded in the LDA Design Study, no Green Belt release should be contemplated in this sector.

**Sectors 18 and 19: Eastern Side of Fen Ditton and West of Fen Ditton**

The LDA Design Study states, in the case of sectors 18 and 19, that *"it is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes"* where the assessment process has not identified any locations within the sector that could accommodate development.

Clarification is then provided for each sub area as to why development would not be acceptable. In locations where parts of a sector or sub area have been identified that could accommodate development, such as in sectors 8, 10, 11, 12 and 13, parameters are provided that would avoid significant harm.

The links between the 16 qualities used as criteria for the assessment and the National and Cambridge Green Belt purposes are described fully in section 5.2 of the LDA Design Study, along with the summary table on pages 59-60. For each sector, and where applicable sub area, under the heading 'Importance of the Sector to Green Belt Purposes' the Study identifies the qualities which are most relevant to the sector and sub areas, on which the assessment of importance is primarily based. These can then be related back to the National and Cambridge Green Belt purposes. Furthermore, the importance of a particular area of land to Green Belt is not determined by the number of Green Belt purposes it performs.

This site at east of Horningsea Road, Fen Ditton, falls within sub area 18.2, as identified in the LDA Design Study. Sector 18 is considered in detail in section 6.21 of the LDA Design Study. Paragraph 6.21.5 of the LDA Design Study considers the implications of Green Belt release for development within Sector 18, stating that within sub area 18.2 development would *"affect the rural setting, form and character of the village"* referring to Fen Ditton. As concluded in the LDA Design Study, no Green Belt release should be contemplated in this sector.

**Land outside the scope of the Green Belt Study**

The LDA Study addresses the inner Green Belt boundary only. Green Belt issues around South Cambridgeshire villages are matters for consideration at a later point in the examination process on a site by site basis as appropriate to duly made representations to the Submitted Local Plan.

**Development Strategy**

As set out in the Councils' assessment under modification

	<p>PM/SC/2/N, in order to ensure the Local Plans fully explain the reasons for the development strategy, it is proposed to add further text to the both plans, explaining the further work that was undertaken and the reasons for the approach taken to the strategy. This is proposed as a revision to Modification PM/SC/2/C for the South Cambridgeshire Plan, and PM/CC/2/E for the Cambridge Plan.</p>
<p><b>Approach to Proposed Modification</b></p>	<p>Submit proposed modification PM/SC/2/C to the Examination Inspectors, but with additional wording below (highlighted in <b><u>bold underline</u></b>)</p> <p><u>In response to issues raised by the Inspectors during the Local Plan Examination, the Councils commissioned a new independent Inner Green Belt Review in 2015. This concluded that beyond those locations already identified in the submission Local Plans it is unlikely that any development could be accommodated without substantial harm to Green Belt purposes (in most locations around the edge of the City). Additional work was carried to consider sites on the edge of Cambridge on an equal basis with other sites, through transport modelling and Sustainability Appraisal. <b>Work was also undertaken on an updated Infrastructure Delivery Study and Viability Report with a Development Strategy document that drew together the findings of all the additional work. The Development Strategy Update and the Joint Sustainability Appraisal Addendum set out how the issue of Green Belt was considered through the plan making process, meeting the requirements of paragraphs 84 and 85 of the NPPF to consider the sustainability impacts of developing outside the Green Belt compared with removing land from the Green Belt for development. This work confirmed that the approach to the development strategy. Further work was also undertaken to demonstrate that the transport measures necessary to support sustainable new settlements are capable of being delivered. The Greater Cambridge City Deal provided a position statement in March 2016 that confirms the City Deal partners are wholly committed to delivery of the infrastructure programme for the benefit of existing and future residents and businesses through the provision of an enhanced transport network that provides good quality connectivity between homes and jobs, including supporting and securing new development provided for in the Local Plans through the delivery of key infrastructure schemes.</b></u></p>

<b>Proposed Modification: PM/SC/2/D</b> <b>New bullet point to paragraph 2.17</b>			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Not applicable.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable.</li> </ul>		
<b>Councils' Assessment</b>	Modification to reflect the updated evidence prepared in response to the Inspectors' Letter and how it was considered by the Councils, including at the Joint Strategic Transport and Spatial Planning Group.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/D to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/2/E</b> <b>Table at paragraph 2.21</b>			
<b>Representations Received</b>	Support: 3	Object: 14	Total: 17
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>RLW Estates</b> Support increased number of dwellings from new settlements. Relies on cautious assumptions on delivery of Waterbeach – rates could be higher. However, concern over overall quantum and proportion of homes within rural area which reflects absence of 5 year supply and underlines importance of progressing plan to adoption.</li> <li>• <b>Rustat Road Neighbourhood Association</b> Comfortable with revised numbers.</li> <li>• Support modification – Council should use every opportunity to provide for a proportion of the additional 500 units through dispersal to sites in rural locations, particularly on windfall brownfield sites. Would reduce risk of non-delivery by reducing reliance on new settlement options.</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• <b>Commercial Estates Group</b> Objectively Assessed Need is greater than the Councils propose.</li> <li>• <b>Barratt Eastern Counties &amp; North West Cambridge Consortium of Landowners, Endurance Estates, Unwins &amp; Biggs, Pembroke College &amp; Balaam Family, Great Shelford Ten Acres and Bidwells</b> Strategy remains too heavily reliant on new settlements where significant uncertainty exists with regard to deliverability. Broadly welcome changes to reduce the annual delivery assumptions, although cumulative housing delivery at Cambourne and Bourn remain too high. Noted that the proportion of developments proposed in villages has</li> </ul>		



	<p>increased, this is partly due to unplanned development coming forward in the absence of South Cambs having a five year supply. Would be better for South Cambs to take a planned approach to such developments through further allocations.</p> <ul style="list-style-type: none"> <li>• <b>North Barton Road Land Owners Group</b> No action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The South Cambs housing trajectory should be treated with caution and is highly likely to be overly optimistic because historic monitoring data demonstrates less housing is delivered than predicted. Over reliance on new settlements to maintain an adequate housing land supply is a risky strategy. Timetable for delivery needs to be reassessed in detail.</li> <li>• <b>Pigeon Land &amp; LIH</b> Provision continues to be made for approximately 50% of the housing requirement in the less sustainable third and fourth tiers of the settlement hierarchy (new settlements and the rural area). It is acknowledged that the level of provision in new settlements has reduced but there has been a corresponding rise in the rural area. None of additional evidence addresses concerns raised about the reliance on the new settlements and also rural area, both of which are less sustainable than the edge of Cambridge.</li> <li>• <b>Hill Residential</b> Not the most appropriate strategy when considered against reasonable alternatives. Increasing number of dwellings on Policy H/1b in line with pre-application advice would represent a sustainable and deliverable approach.</li> <li>• <b>Laragh Homes</b> Development strategy seems to ignore the opportunity to promote development in existing sustainable communities as an alternative to a reliance on limited sites on the urban fringe and new settlements which are reliant on the delivery of significant levels of infrastructure. This alternative has not been sufficiently scrutinised to be discounted at this stage. Modifications should take the opportunity to allocate a wider range of developable sites in sustainable locations.</li> <li>• <b>Scott Properties</b> Council's current position suggests that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer). This provides a strong indication that additional housing is required.</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Table should be removed to reflect flexibility provided by modifications to Policy S/6.</li> </ul>
<b>Councils'</b>	This table sets out the distribution of new dwellings at each level of

<b>Assessment</b>	<p>the development sequence. Representations focus on strategy choices reflected in the table. These issues are considered in the Council's responses to other modifications.</p> <p>The Councils consider that the modification is sound, although a mistyped number needs to be corrected in the table. The proposed modification to the total for Cambridge Urban Area should read 6,828 not 6,282. This will make the tables in PM/SC/2/E and PM/SC/2/F consistent.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p> <p><u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/SC/2/H</p> <p><u>Note:</u> Issue of number of dwellings on Policy H/1b is addressed under modification PM/SC/2/B.</p>
<b>Approach to Proposed Modification</b>	<p>Submit proposed modification PM/SC/2/E to the Examination Inspectors with the following further change:</p> <p>The proposed modification to the total for Cambridge Urban Area should read 6,828 not 6,282.</p>

<b>Proposed Modification: PM/SC/2/F</b> <b>Table at paragraph 2.22</b>			
<b>Representations Received</b>	Support: 1	Object: 10	Total: 11
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>RLW Estates</b> Evident that the greatest shift has been between the new settlements and villages categories – increase in proportions at new settlements is appropriate given the limited additional capacity within the Cambridge Urban Area, and similarly finite capacity of unconstrained sites within the Cambridge Fringe.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>North Barton Road Land Owners Group</b> No action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The South Cambs housing trajectory should be treated with caution and is highly likely to be overly optimistic because historic monitoring data demonstrates less housing is delivered than predicted. Over reliance on new settlements to maintain an adequate housing land supply is a risky strategy. Timetable for delivery needs to be reassessed in detail.</li> <li>• <b>Barratt Eastern Counties &amp; North West Cambridge Consortium of Landowners, Endurance Estates,</b></li> </ul>		

	<p><b>Unwins &amp; Biggs, Pembroke College &amp; Balaam Family, Great Shelford Ten Acres and Bidwells</b> Strategy remains too heavily reliant on new settlements where significant uncertainty exists with regard to deliverability. Broadly welcome changes to reduce the annual delivery assumptions, although cumulative housing delivery at Cambourne and Bourn remain too high. Noted that the proportion of developments proposed in villages has increased, this is partly due to unplanned development coming forward in the absence of South Cambs having a five year supply. Would be better for South Cambs to take a planned approach to such developments through further allocations.</p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land &amp; LIH</b> Provision continues to be made for approximately 50% of the housing requirement in the less sustainable third and fourth tiers of the settlement hierarchy (new settlements and the rural area). It is acknowledged that the level of provision in new settlements has reduced but there has been a corresponding rise in the rural area. None of additional evidence addresses concerns raised about the reliance on the new settlements and also rural area, both of which are less sustainable than the edge of Cambridge.</li> <li>• <b>Laragh Homes</b> Development strategy seems to ignore the opportunity to promote development in existing sustainable communities as an alternative to a reliance on limited sites on the urban fringe and new settlements which are reliant on the delivery of significant levels of infrastructure. This alternative has not been sufficiently scrutinised to be discounted at this stage. Modifications should take the opportunity to allocate a wider range of developable sites in sustainable locations.</li> <li>• <b>Commercial Estates Group</b> Objectively Assessed Need is greater than the Councils propose.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p>This table sets out the distribution of new dwellings at each level of the development sequence. Representations focus on strategy choices reflected in the table. These issues are considered in the Council's responses to other modifications.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p> <p><u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/SC/2/H</p> <p><u>Note:</u> Issues regarding the delivery rates of major developments are addressed under modification PM/SC/2/R.</p>
<p><b>Approach to</b></p>	<p>No Change. Submit proposed modification PM/SC/2/F to the</p>

<b>Proposed Modification</b>	Examination Inspectors.
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<b>Proposed Modification: PM/SC/2/G</b>			
<b>Paragraph 2.32</b>			
<b>Representations Received</b>	Support: 2	Object: 20	Total: 22
<b>Main Issues</b>	<p><b><u>General Issues:</u></b></p> <p><b><i>Supports:</i></b></p> <ul style="list-style-type: none"> <li>• <b>Historic England:</b> <ul style="list-style-type: none"> <li>➤ welcomes the preparation of the 2015 Green Belt study, which we believe provides the necessary evidence base to underpin the decisions made in respect of further release of Green Belt land.</li> <li>➤ supports the methodology adopted in this study;</li> <li>➤ agrees with the main findings set out in paragraph 0.4.2 of the study;</li> <li>➤ notes that the methodology used by the consultants in their study is different to that used by the Councils, but they come to broadly similar conclusions;</li> <li>➤ welcomes the Study's recommendation that any land release in the north western corner of sub-area 13.1 should extend no further east than the Yarrow Road roundabout.</li> <li>➤ confirms that there is nothing in the proposed Major Modifications or the LDA Inner Green Belt Study that would undermine their previously agreed Statement of Common Ground concerning the Green Belt. They would be happy to participate in any update to the Statement of Common Ground.</li> </ul> </li> </ul> <p><b><i>Objections:</i></b></p> <p><u>Note:</u> See key issues under modifications PM/CC/2/E and PM/SC/2/C</p> <ul style="list-style-type: none"> <li>• The inclusion of the wording at paragraph 2.32 of the South Cambridgeshire Local Plan fails to acknowledge the results of the inner Green Belt review. The plan is not based on proportionate evidence and is not the most appropriate strategy when considered against reasonable alternatives. It is contrary to NPPF paragraph 85.</li> <li>• A full Green Belt Study covering both South Cambridgeshire and Cambridge is required to assess whether additional Green Belt land can be released in the more sustainable rural centres.</li> <li>• It is noted that the proportion of developments now proposed within the villages has increased, and this has partly arisen through unplanned development in the absence of South Cambridgeshire having a five year housing land supply. It is</li> </ul>		

considered that the more sustainable 'Better Served' villages within the district continue to have a further role to play in meeting the district's future housing needs. It is considered that it would be better for the district to take a planned approach to such development through further allocations in the more sustainable villages, and that the Inner Green Belt Review should have given consideration to this.

**Objections regarding the methodological approach to the 2015 Green Belt Study:**

**Green Belt Qualities and Purposes**

Note: See key issues under modifications PM/CC/2/E and PM/SC/2/C

**Measurable Thresholds**

Note: See key issues under modifications PM/CC/2/E and PM/SC/2/C

**Assessment Parcels**

Note: See key issues under modifications PM/CC/2/E and PM/SC/2/C

**Consistency between 2002 and 2015 Green Belt Studies**

- Furthermore, some of the assessments and conclusions drawn in the LDA 2015 Study are not consistent with those set out in the Inner Green Belt Boundary Review carried out by LDA in 2002 for South Cambridgeshire District Council.

**Basis for selection of site options**

- The basis on which site options are selected is not clear and is contradictory. The weight attributed to the Green Belt purpose for sites which are discounted as reasonable alternatives is not clear. This is not a good evidence base to support Plans which should be genuinely sustainable and in which economic, social and environmental needs are clearly set out and balanced against clear, robust and consistent Green Belt considerations. This evidence base should be given little weight and does not comply with the requirements of Paragraphs 84 and 85 of the NPPF.

**Inconsistencies between 2012 and 2015 Green Belt Studies**

Note: See key issues under modification PM/SC/2/C.

**Objections regarding specific sectors within the 2015 Green Belt Study:**

**Sector 1: East of Huntingdon Road**

	<p><u>Note:</u> See key issues under modification PM/SC/2/C.</p> <p><b>Sectors 3 and 4: North of Barton Road and South of Barton Road</b></p> <p><u>Note:</u> See key issues under modifications PM/CC/2/E and PM/SC/2/C</p> <p><b>Sector 7: South west of Trumpington</b></p> <p><u>Note:</u> See key issues under modifications PM/CC/2/E and PM/SC/2/C</p> <p><b>Sector 8: Cambridge South – land west of Cambridge Road</b></p> <p><u>Note:</u> See key issues under modification PM/SC/2/C.</p> <p><b>Sector 9: Hobson’s Brook Corridor</b></p> <p><u>Note:</u> See key issues under modification PM/SC/2/C.</p> <p><b>Sector 10: South of Addenbrooke’s</b></p> <p><u>Note:</u> for other non-Green Belt issues on Sector 10 see modification PM/SC/8/A.</p> <p><u>Note:</u> See key issues on Green Belt under modification PM/SC/2/C.</p> <p><b>Sectors 11, 12 and 13: West of Limekiln Road, South East Cambridge, and South of Fulbourn</b></p> <p><u>Note:</u> Amendment to boundary of GB2 is addressed under modification PM/CC/2E.</p> <p><u>Note:</u> Deletion of GB1 and GB2 is addressed under modification PM/CC/2/G.</p> <p><u>Note:</u> Policy E/2 Fulbourn Road East is addressed under modification PM/SC/8/C.</p> <p><u>Note:</u> See key issues under modifications PM/CC/2/E and PM/SC/2/C</p> <p><b>Sector 14: East of Cherry Hinton</b></p> <p><u>Note:</u> See key issues under modification PM/SC/2/C</p> <p><b>Sectors 18 and 19: : Eastern Side of Fen Ditton and West of Fen Ditton</b></p> <p><u>Note:</u> See key issues under modifications PM/CC/2/E and PM/SC/2/C</p> <p><b>Land outside the scope of the Green Belt Study</b></p>
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	<u>Note:</u> See key issues under modification PM/SC/2/C
<b>Councils' Response</b>	<p><b><u>General Issues</u></b></p> <p><b><i>Supports:</i></b> Support noted. The Councils will consider whether any amendments are required to their Statement of Common Ground with Historic England.</p> <p><b><i>Objections:</i></b> <u>Note:</u> See key issues under modifications PM/CC/2/E and PM/SC/2/C</p> <p><b>Acknowledgement of the findings of the LDA Design Study</b> The findings of the LDA Design Study have been considered together with other evidence base documents, such as the South Cambridgeshire Strategic Housing Land Availability Assessment (SHLAA). This representation relates to a site to the rear of Cambridge Road which lies north east of the rugby club in Great Shelford. This site has been assessed through the Council's SHLAA (Site 005) and has not been allocated for development as it lies outside the village's development framework and has poor access.</p> <p><b>Need for a full Green Belt Study</b> Cambridge and South Cambridgeshire's shared development strategy is based on a development sequence defined as:</p> <ol style="list-style-type: none"> <li>1. Within the built up area of Cambridge;</li> <li>2. On the edge of Cambridge;</li> <li>3. At new settlements in South Cambridgeshire;</li> <li>4. In the rural area at Rural Centres and Minor Rural Centres in South Cambridgeshire.</li> </ol> <p>Emphasis has been placed on development within the higher categories within the development sequence.</p> <p>The specification for the LDA Design Study was to address the inner Green Belt boundary only, not to consider the outer boundary or the boundary around settlements within the Green Belt. Edge of village sites within the inner Green Belt were assessed in the LDA Design Study as part of the relevant sector or sub area in which they are located.</p> <p><b><u>Objections regarding the methodological approach to the 2015 Green Belt Study:</u></b></p> <p><b>Green Belt Qualities and Purposes</b> <u>Note:</u> See key issues under modifications PM/CC/2/E and</p>

PM/SC/2/C

**Measurable Thresholds**

Note: See key issues under modifications PM/CC/2/E and PM/SC/2/C

**Assessment Parcels**

Note: See key issues under modifications PM/CC/2/E and PM/SC/2/C

**Consistency between 2002 and 2015 Green Belt Studies**

Para 4.4 of the Helen Thompson report contrasts the finding of LDA Design’s 2002 Study that there was potential to develop parts of ‘the areas east and south of Trumpington’ with the finding of the 2015 Study that there is no such potential. It also notes that the 2002 Study did not identify opportunities for large scale development south of Addenbrooke’s whilst the 2015 Study identifies land south of Addenbrooke’s Biomedical Campus as being capable of accommodating development without significant long term harm to Green Belt purposes. The reference to areas east and south of Trumpington in LDA Design’s 2002 Study is to the area shown as 11 on drawing 1641LP/10 in that Study, which is now being built out as the Clay Farm development. There was no suggestion in the 2002 Study that further areas east and south of Trumpington could be developed. The Biomedical Campus has expanded significantly since 2002 and has had an urbanising effect on the adjacent Green Belt land, as noted in the assessment of sector 10 on pages 125-130 of LDA Design’s 2015 Study (particularly criteria 16). In the context of this ongoing development, an extension of development further south into sector 10 could be undertaken without significant long-term harm to Green Belt purposes, provided the specified parameters are followed.

Para 4.6 of the Helen Thompson report notes that LDA Design’s 2002 Study describes Cambridge South as Connective townscape/landscape whereas the 2015 Study identifies the northern part of sector 8 as Supportive. The explanation for this change is given at criterion 8 of the assessment of sector 8 on page 117 of the LDA Design 2015 Study. Whilst Helen Thompson claims that this is not relevant to Green Belt purposes, townscape/landscape role and function is one of the 16 qualities derived from Green Belt purposes.

**Basis for selection of site options**

The LDA Design Study does not take account of paragraph 85 itself as is referenced in paragraph 1.1.5 of the document. This was intentional and appropriate. The purpose of the LDA Design



Study was to help the Councils reach a view on whether there are specific areas of land that could be considered for release from the Green Belt and allocated for development to meet identified needs, without significant harm to Green Belt purposes, and to understand the level of harm that development on the edge of Cambridge generally would have on Green Belt purposes.

**Inconsistencies between 2012 and 2015 Green Belt Studies**

Note: See modification PM/SC/2/C

**Objections regarding specific sectors within the 2015 Green Belt Study:**

**Sector 1: East of Huntingdon Road**

Note: See modification PM/SC/2/C

**Sectors 3 and 4: North of Barton Road and South of Barton Road**

Note: See modifications PM/SC/2/C and PM/CC/2/E

**Sector 7: South west of Trumpington**

Note: See modifications PM/SC/2/C and PM/CC/2/E

**Sector 8: Cambridge South – land west of Cambridge Road**

Note: See modification PM/SC/2/C

**Sector 9: Hobson’s Brook Corridor**

Note: See modification PM/SC/2/C

**Sector 10: South of Addenbrooke’s**

Note: for other non-Green Belt issues on Sector 10 see modification PM/SC/8/A.

Note: See Green Belt response under modification PM/SC/2/C.

**Sectors 11, 12 and 13: West of Limekiln Road, South East Cambridge, and South of Fulbourn**

Note: Amendment to boundary of GB2 is addressed under modification PM/CC/2E.

Note: Deletion of GB1 and GB2 is addressed under modification PM/CC/2/G.

Note: Policy E/2 Fulbourn Road East is addressed under modification PM/SC/8/C.

Note: See modifications PM/CC/2/E and PM/SC/2/C for remaining issues.

	<p><b>Sector 14: East of Cherry Hinton</b>  <u>Note:</u> See modification PM/SC/2/C</p> <p><b>Sectors 18 and 19: Eastern Side of Fen Ditton and West of Fen Ditton</b>  <u>Note:</u> See modifications PM/SC/2/C and PM/CC/2/E</p> <p><b>Land outside the scope of the Green Belt Study</b>  <u>Note:</u> See modification PM/SC/2/C</p>
<b>Approach to Proposed Modification</b>	<p>No Change. Submit proposed modification PM/SC/2/G to the Examination Inspectors.</p> <p>For text relating to provisional modification relating to Cambridge Biomedical Campus Expansion, see approach under modification PM/SC/8/A.</p>

<b>Proposed Modification: PM/SC/2/H</b>			
<b>Policy S/5: Provision of New Jobs and Homes</b>			
<b>Representations Received</b>	Support: 7	Object: 33	Total: 40
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>Support, the OAN for South Cambridgeshire has been provided for, no further village development needed.</li> <li>Support, good balance jobs and homes.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li><b>Histon and Impington Parish Council</b> Astra Zenica and the development of the Cambridge Northern Fringe East will lead to an increased demand for homes and above original plan predictions. The revised plan is not consistent with these changes to employment prospects.</li> <li><b>Great Shelford 10 Acres</b> PBA report is flawed because it does not consider economic trends. Market signals indicate long term undersupply compared to demand. It is not compliant with national guidance. OAN should be higher to boost housing supply. South Cambridgeshire OAN should be 24,400 homes.</li> <li><b>NBRLOG, SBRLOG</b> PBA report not compliant with national guidance. It does not consider housing needed to match economic growth. The plans would result in an increase in in-commuting into Cambridge and South Cambridgeshire of 14,900 workers which is unsustainable. Its demographic assumptions are flawed in respect of household formation rates. It does not consider land prices as a market signal. It does not enhance affordability and provide an uplift to address affordable housing need in Cambridge. Housing target for Cambridge should be 15,200 dwellings and 27,000 in South Cambridgeshire.</li> </ul>		

	<ul style="list-style-type: none"> <li>• <b>Cambridgeshire County Council Strategic Assets Team</b> PBA report inadequate. Provision at lower end of possible options and does not boost housing supply. The housing crisis and need for affordable housing require a housing target of 42,780 dwellings for both authorities together.</li> <li>• <b>Grosvenor</b> House prices 45% above 2007/08 peak in Cambridge and 25% in South Cambridgeshire compared to 2.5% rise in England and Wales. Comparator authorities used in PBA report not appropriate. A dwelling uplift to the OAN of significantly more than 30% justified for Cambridge and more than 20% for South Cambridgeshire.</li> <li>• <b>Ely DBF, Quy Estates, Shelford Investments, Cala Homes</b> An increase of 500 homes is at the lower end of possible options and would not boost significantly the supply of housing. Target for South Cambridgeshire should be 21,500. A boost is needed to address the housing crisis and the shortage of affordable housing and to allow growth in more sustainable villages to support the local economy and services and facilities. The number of jobs proposed will not be supported by the proposed housing.</li> <li>• <b>Green Party</b> The increase to 19,500 will threaten the Green Belt, and harm sustainability and quality of life. Housing needs should be first met through better use of existing stock (vacant homes, second homes and under occupancy). New homes must be genuinely affordable.</li> <li>• <b>Laragh Homes</b> 19,500 homes for South Cambridgeshire including a 500 home uplift is at the low end of OAN options and should be higher. Cambridge and South Cambridgeshire are closely linked, the 30% uplift applied to Cambridge should also be applied to South Cambridgeshire. Additional housing sites should be allocated in sustainable villages such as Swavesey.</li> <li>• <b>MG Homes and Harcourt Developments</b> A 20% uplift to OAN is justified for South Cambridgeshire. Chosen comparator authorities are not comparable. Market signals worse than elsewhere in England and Wales. Housing numbers will not match jobs growth and will lead to a growth in in-commuting.</li> <li>• <b>CEG</b> PBA report does not take account of suppressed household formation for young adults due to past housing undersupply (5,671 in Cambridge and 5,600 in South Cambridgeshire) which is a major flaw. Housing growth will not support the jobs target of 44,000. A future shortage of 7,000 to 12,000 workers will be the result. This will lead to a large growth in in-commuting into Cambridge and South Cambridgeshire. Huntingdonshire, Fenland and East Cambridgeshire cannot be relied on to provide the</li> </ul>
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	<p>necessary workers. No upward adjustment to OAN is proposed to provide more affordable homes in Cambridge. Combined housing target of 41,000 justified to return household formation to pre recession trends. Eastleigh is not a good comparator for Cambridge on which to determine appropriate uplifts.</p> <ul style="list-style-type: none"> <li>• <b>Scott Properties</b> PBA predicts an OAN of 17,579 for South Cambridgeshire based on DCLG 2012 projections which is below the SHMA figure of 19,000 homes. The higher figure is preferred. The 10% uplift should be applied to the SHMA 19,000 target not to the 17,579 OAN. This gives 20,900 which should be the figure for South Cambridgeshire. Full provision is not made for the extra City Deal 1,000 homes.</li> <li>• <b>Bloor Homes</b> South Cambridgeshire OAN should be 820 homes higher on basis of previous evidence which would require additional sites in rural settlements and to meet City Deal commitment. Unclear how rural exceptions accounted for in Council's housing trajectory - not specifically identified; assume subsumed in windfall allowance.</li> <li>• <b>U&amp;C, RLW</b> Agree the 17,052 demographic starting point but 10% uplift inadequately reflects future jobs growth. EEFM High Migration scenario (2013) should be used. Household formation rates suppressed in past and no recovery allowance included. 14,000 appropriate for Cambridge, 21% uplift for South Cambridgeshire would lift its target to 20,600 homes. Too low an OAN will exacerbate affordability issues and encourage unsustainable travel patterns.</li> <li>• <b>U&amp;B, Endurance Estates, Pembroke College and Balaam Family</b> PBA report is flawed because it does not consider economic trends. OAN should be 24,400. Market signals indicate long term undersupply compared to demand. It is not compliant with national guidance.</li> <li>• <b>Hill Residential</b> Housing numbers ignore the most recent and relevant housing data. Better use could be made of site H/1:b in Sawston to increase housing numbers.</li> <li>• <b>Barratt</b> PBA report is flawed because it does not consider economic trends. Market signals indicate long term undersupply compared to demand. It is not compliant with national guidance. OAN should be higher to boost housing supply.</li> <li>• <b>Pigeon and LIH</b> The SHMA was not compliant with national planning practice guidance. PBA report underestimates OAN. Its demographic projections do not take into account past suppression of household formation in young adults. Economic growth expectations are not</li> </ul>
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	<p>addressed meaning housing provision and economic growth are not aligned. The resulting lack of local labour will increase in-commuting from outside Cambridge and South Cambridgeshire by 14,900 workers (1 in 3 jobs) which is unsustainable. Significant key market signals on land prices and past under delivery have not been assessed. Our evidence shows Cambridge market signals are much worse than elsewhere in the East of England and are comparable to London. Housing affordability not addressed. No uplift provided to boost affordable housing. Cambridge OAN should be 15,200 homes and South Cambridgeshire's 27,000 homes to 2031. Chosen comparator authorities not appropriate, an uplift to OAN of significantly more than 30% justified for Cambridge and 30% for South Cambridgeshire.</p> <ul style="list-style-type: none"> <li>• <b>MCA</b> The 2012 based ONS SNPP underestimates population growth due to migration. The long term trend is preferred. Past under delivery (-368 pa 2004-2014) will have suppressed net in-migration. To match planned job growth more housing is needed. Household formation has been suppressed in the past, the plans should provide for a return to pre-recession household formation rates (HFR) for age groups 25-44 which will increase annual dwelling requirement to 879 homes. Market signals in South Cambridgeshire are worse than Eastleigh and are more than 'modest' where a 10% uplift is justified. To match jobs growth to 2031, address affordability and other market signals and affordable housing need 1,073 homes per year will be needed in accordance with the EPOA economic-led scenario. This equates to a 22% uplift to OAN for South Cambridgeshire. Adjustment to address suppressed HFR would increase this further. Annual provision in South Cambridgeshire should be between 1,075 and 1,125 homes.</li> <li>• <b>Grosvenor</b> Table 10 of the Councils' Matter 3 statements identify that every year in Cambridge there is newly arising affordable need of 404 homes. The plans therefore cannot meet needs in and on the edge of Cambridge at the end of the plan period when only c350 homes are delivered each year. The housing figures will not deliver sufficient new homes to tackle the need for affordable housing. At the end of the plan period the back log will be greater than at the start of the plan period.</li> <li>• <b>Gladman</b> The PBA work does not represent a full and objective assessment of need it simply responds to the concerns of the Inspectors. It does not take account of future jobs – this is a fundamental failure. No consideration has been given to how the latest demographic projections</li> </ul>
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	<p>referenced in the PBA report meet the likely change in job numbers. The councils housing need evidence needs to be comprehensively revised. Meeting housing needs in surrounding authorities will result in in-commuting. This is not considered to be an OAN assumption and is instead a policy-on adjustment, distributing housing need instead of meeting it in Cambridge and South Cambs. that market signals are more severe in Cambridge than in South Cambs. However there is evidence of household formation suppression for the 25-34 age group in South Cambs. The 10% uplift does not go far enough to address this critical issue.</p> <ul style="list-style-type: none"> <li>• <b>Cambridge University Health Partners</b> The modification is based on an overall Local Plans housing requirement of 33,000 homes. This estimate does not properly take into account planned and expected employment growth across all sectors across the region. The South Cambridgeshire OAN should be 30,000 homes and include homes within cycle/walk/public transport distance of the Cambridge Biomedical Campus.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p><u>Boost Housing Supply</u>  A number of representations consider that the provision of 33,500 new homes across Cambridge and South Cambridgeshire will not boost housing supply significantly. This view is contradicted by the Councils evidence in the SHMA, which was considered at the Matter 3 hearings in November 2014 and by Further Evidence on OAN prepared for the Councils by Peter Brett Associates (PBA) in November 2015 (RD/MC/040). The SHMA took an integrated approach to demographic trends and future employment and identified a OAN of 33,000 for the two authorities (14,000 Cambridge and 19,000 for South Cambs). The PBA report November 2015 Further Evidence report looked at past demographic trends and market signals and identified an OAN of 19,337 for South Cambs (rounded by the Councils to 19,500) and 13,090 for Cambridge. To meet the tests in PPG and to boost housing supply significantly the Councils have chosen the higher figure for OAN for both authorities from either the SHMA or the PBA Further Evidence report.</p> <p><u>Not compliant with National Guidance</u>  A number of representations seek to demonstrate that our approach to calculation of OAN is not consistent with national guidance. This was a matter considered at the Matter 3 hearings in November 2014 and is not an issue on which the Inspectors letter of 20 May 2015 asked the Council to address.</p> <p>Nevertheless, in undertaking the additional work requested by the Inspectors in their letter, the Further Evidence report by PBA</p>

ensures consistency for those issues with national guidance, which was published too late to inform the Local Plans.

#### Market Signals / OAN Uplift

Concerns are expressed that the Councils PBA Further Evidence on OAN report of November 2015 has not properly taken into account market signals including affordability, house prices and land prices and that the appropriate uplifts for each Council should be higher. The PBA Further Evidence report analysed the market signals in the PPG and concluded that they warranted upward adjustment to the demographic starting point of 30% for Cambridge and 10% for South Cambridgeshire.

PBA have prepared a response to objectors for the Councils (RD/MC/041 - March 2016). Regarding house prices it concludes that when considered over appropriate time periods the house price comparisons made to Canterbury for Cambridge, and to Uttlesford and Eastleigh for South Cambridgeshire remain appropriate. Regarding land prices it finds that the period presented in the Savills' land price analysis bears no relationship with the demographic projections and that there are technical limitations to the utility of the Savills' in-house land price index. In respect of affordability PBA report that the Savills' data for 2014 tells us nothing about whether the starting point demographic projections should be uplifted, because those projections carry forward trends that ended in 2013 and take no account of anything that happened in 2014.

The appropriate market signals uplift for Cambridge remains 30% and for South Cambridgeshire 10%.

#### Household Formation Rates

The PBA Further Evidence report on OAN (November 2015) took its household formation rates from the 2012 based CLG household projection (which remains the most up to date official release). Several objectors maintain that these rates should be increased particularly for young adults to provide a partial or total return to the higher rates expected by the earlier CLG 2008 projection. The PBA response to objectors of March 2016 document looks at this issue in detail and concludes that there is no justification for upward adjustment to the CLG 2012 household formation rates. At a national level these remain the best available view of future household formation, as stated in the PPG and confirmed by authoritative studies and recent Inspectors' findings. At a local level the evidence from formation rates does not provide robust evidence on the balance of the market.

It is agreed that the starting point demographic projections require

adjustment to reflect future housing need. Uplifts to demographic starting points of 30% for Cambridge and 10% for South Cambridgeshire are appropriate. However this should be done directly to the housing numbers rather than via amending household formation rates as objectors propose. PBA give two reasons for this approach, first because formation rates are an unreliable indicator of housing market balance, and second because in real life, supply constraints suppress net in-migration as well as household formation rates.

#### Jobs/Economy/Commuting

A number of representations concern the lack of alignment of jobs and housing in Cambridge and South Cambridgeshire and the resulting reliance on high and increasing levels of in-commuting. The Local Plans providing together for 33,500 homes and 44,000 jobs by 2031.

These points largely relate to issues which have already been considered during the Matter 3 hearings in November 2014 which looked at the extent of the HMA, existing and future commuting levels and how the SHMA took account of housing and economic needs including forecast job numbers. The Councils maintain their view that the HMA is the wider area covered by the SHMA, within which there is a good balance between jobs and homes.

The Councils are aware that the latest update to the EEFM forecasting model is to be published shortly. If the jobs forecasts differ significantly from the ones relied on by the SHMA the most appropriate response would be to address this through an early Local Plan review. It is important to complete the examination process as quickly as possible to replace the adopted plans that cover the period to end of March 2016, and to provide certainty over the development strategy moving forward. This update will be considered when published and a report will, as necessary and appropriate, be provided to the examining inspectors as to any relevant implications which may arise.

#### Affordable Housing

A number of objectors maintain that the OAN for housing should be higher to support more affordable housing, especially in Cambridge where around half of affordable housing need can be met through planned development.

The PBA Further Evidence report of November 2015 advised that such an approach would depend partly upon capacity being available but that realistically such provision might undermine housing development in other parts of the housing market area and probably not reduce the local shortage of affordable housing.



	<p>Regarding capacity in Cambridge the Councils have looked carefully at housing land supply in Cambridge (see assessment under modification PM/CC/2/H), the Green Belt (see assessment under modification PM/CC/2/E) and the development strategy (see assessments under modifications PM/CC/2/D and PM/SC/2/N). Proposed modification PM/CC/2/A to increase the allocation north of Cherry Hinton will provide for an additional 430 homes in Cambridge which could provide an additional 172 affordable homes at 40% provision.</p> <p>The PBA response to objectors report (RD/MC/041 - March 2016) has considered this issue further and identified a number of Inspectors Reports which support the judgement that any adjustment should be modest and realistic. Overall the Councils consider that the plans provide for a realistic proportion of affordable need to be met in Cambridge.</p> <p><u>Green Belt sites GB1 and GB2</u> These site allocations are in Cambridge and a matter for the Cambridge Local Plan. See the assessment under modification PM/CC/2/G.</p> <p><u>Brownfield Land</u> The Local Plans already prioritise development in the urban area of Cambridge above all other locations. See the assessment under modification PM/SC/2/D.</p> <p><u>Development Strategy</u> See the assessment under modification PM/SC/2/N.</p> <p><u>Migration</u> A number of representations concern whether sufficient account has been given in the OAN to migration, both nationally (and especially with regard to London), and internationally.</p> <p>The Inspectors letter of 20<sup>th</sup> May 2015 did not ask any questions concerning migration, implying that the issue was adequately covered in the SHMA Technical Report (RD/Strat/080 at 6.3.1 Fig 18 page 39) which finds that around 60% of population growth is accounted for by economic migration. Also see the Councils Matter 3 statement at paragraph 18 page 7. In any event the ONS NPP 2012 based population projections which do take account of more recent migration data produce lower population change projections for the period 2011 to 2031 of 10,400 for Cambridge and 33,100 for South Cambs than the SHMA figures for the same period (27,000 for Cambridge and 38,000 for South Cambs) as discussed in the Councils Matter 3 statement Appendix 2 paragraph 5 page 15).</p>
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	<p>Some representations would prefer OAN to be based on the EEFM High Migration Forecast 2013. The SHMA took this forecast into account along with other economic forecasts and demographic projections. It cannot be demonstrated that this scenario is the most likely to arise and should be relied upon especially with regard to international migration. Net inward migration will depend upon future Government policy towards migration and the relative economic success of different countries. None of which can be known.</p> <p>It is also stated that past under delivery of housing will have suppressed in-migration in the past. The issue of whether a backlog from before the plan period should be added to the OAN was considered at the Matter 3 hearings in November 2014, and is addressed in the SHMA (RD/Strat/090 in chapter 12 paragraph 81). We say that it should not be so added.</p> <p>In regard to London there has been no approach under the duty to co-operate from the Mayor of London or neighbouring authorities concerning OAN and migration, requesting that part of their OAN should be provided in Cambridge or South Cambridgeshire.</p> <p><u>City Deal 1,000 Homes</u> A number of representations state that the provision is not made for the full City Deal 1,000 homes exception site target. This relates to housing supply rather than to the OAN for housing. See the assessment under modification PM/SC/2/B.</p> <p><u>Sawston site H/1:b</u> It is stated that better use could be made of site H/1:b in Sawston to increase housing numbers. This relates to housing supply rather than to need. In any event policy H/1 allows for housing numbers on a site to be higher or lower than the indicative capacity, as determined through a design led approach.</p> <p><u>OAN must be realistic</u> The assessment of OAN is required to be objective based on facts and evidence. Constraints cannot be applied to OAN as set out in the PPG at paragraph ID 2a-004-20140306.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2H to the Examination Inspectors.

Proposed Modification: PM/SC/2/I Paragraph 2.34			
Representations Received	Support: 1	Object: 9	Total: 10
Main Issues	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Taylor Family and Countryside Properties</b> Support the PBA assessment that took account of national planning guidance published after the submission of the Local Plan to consider issues around the latest national household projections, market signals and affordable housing. This provides a balance between jobs and homes across the HMA.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>MCA</b> The assessment of OAN housing need fails to meet with the requirements set out in the PPG. The proposed increase of 500 homes would be insufficient to address the concerns raised by the Inspector. Rather the data shows a requirement for between 1,073 and 1,125 dwellings per annum.</li> <li>• <b>NBRLOG, SBRLOG</b> The PBA report is flawed as it: ignores the plans' economic aspirations and the level of housing provision necessary to support this; fails to consider assumptions inherent in demographic modelling used on household formation rates; does not consider land values as a market signal; is dismissive of the affordable housing need. The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire. Any unmet Cambridge need to be met in South Cambridgeshire under the duty to cooperate.</li> <li>• <b>CEG</b> The Cambridge Sub Region Strategic Housing Market Assessment 2012 did not take an integrated approach to identification of need for additional jobs and homes in South Cambridgeshire over plan period. An integrated approach to identification of need for additional jobs and homes results in a significantly higher Objectively Assessed Housing Need (OAHN) within the HMA. The Councils' latest OAHN evidence does not take account of the full range of factors which should be taken into account when establishing the OAHN.</li> <li>• <b>Scott Properties</b> PBA predicts an OAN of 17,579 for South Cambridgeshire based on DCLG 2012 projections which is below the SHMA figure of 19,000 homes. The higher figure is preferred. The 10% uplift should be applied to the SHMA 19,000 target not to the 17,579 OAN. This gives 20,900 which should be the figure for South Cambridgeshire. Full provision is not made for the extra</li> </ul>		

	<p>City Deal 1,000 homes.</p> <ul style="list-style-type: none"> <li>• <b>U&amp;B, Endurance Estates, Pembroke College and Balaam Family, Barratt</b> Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends. The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. Proposed Modifications are unsound.</li> </ul>
<b>Councils' Assessment</b>	<u>Note:</u> See the assessment under modification PM/SC/2/H.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/I to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/J</b>			
<b>Paragraph 2.37</b>			
<b>Representations Received</b>	Support: 0	Object: 13	Total: 13
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Great Shelford 10 Acres, Pembroke College and Balaam Family, Endurance Estates, Barratt</b> Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends. The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. Proposed Modifications are unsound.</li> <li>• <b>NBRLOG, SBRLOG</b> The PBA report is flawed as it: ignores the plans' economic aspirations and the level of housing provision necessary to support this; fails to consider assumptions inherent in demographic modelling used on household formation rates; does not consider land values as a market signal; is dismissive of the affordable housing need. The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire. Any unmet Cambridge need to be met in South Cambridgeshire under the duty to cooperate.</li> <li>• <b>Grosvenor</b> Updated assessment of housing need is not considered to be appropriate evidence to justify the plan. Cambridge prices stand 45% above the 2007/08, South</li> </ul>		

	<p>Cambridgeshire are at +25%. In E&amp;W prices are c2.5% above 2007/08 peak. Canterbury and Uttlesford currently c20% above 2007 peak, and Eastleigh is c10% above. Eastleigh is not comparable to South Cambridgeshire. Canterbury is more appropriate for comparison with South Cambridgeshire. South Cambridgeshire uplift should be significantly higher than 20% and a strong case that it should be higher than Canterbury. Cambridge significantly outstrips Canterbury. Uplift for market signals should be significantly higher than 30%.</p> <ul style="list-style-type: none"> <li>• <b>Ely DBF, Quy Estates</b> An increase of 500 homes is at the lower end of possible options and would not boost significantly the supply of housing. Target for South Cambridgeshire should be 21,500. A boost is needed to address the housing crisis and the shortage of affordable housing and to allow growth in more sustainable villages to support the local economy and services and facilities. The number of jobs proposed will not be supported by the proposed housing.</li> <li>• <b>CEG</b> The additional assessment of OAHN does not provide a balance between homes and jobs across HMA. The proposed approach is not justified, effective or consistent with national planning policy. The Councils are promoting homes in locations which do not meet employment needs and consequently do not balance jobs proposed. An integrated approach to identification of need for additional jobs and homes results in a significantly higher OAHN within HMA of 41,000, and this demands spatial pattern of development which focusses on edge of the City.</li> <li>• <b>Pigeon and LIH</b> The level of objectively assessed housing need has been under-estimated for: The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes. Significant key market signals; land values and past under delivery have not been considered. No adjustment has been made to take account of the level of affordable housing need. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.</li> </ul>
<b>Councils' Assessment</b>	<u>Note:</u> See the assessment under modification PM/SC/2/H.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/J to the Examination Inspectors.

Proposed Modification: PM/SC/2/K New paragraph after paragraph 2.37			
Representations Received	Support: 4	Object: 15	Total: 19
Main Issues	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Cambridge PPF</b> The PBA evidence takes adequate account of both recent national guidance and market forces, and therefore provides a realistic basis for the planning of residential provision. Support the Council's projections of 19,337 new homes, rounded up to 19,500, for the plan period.</li> <li>• Reassuring that the new evidence is almost identical to the SHMA.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>MCA</b> Consider that the PBA assessment of OAN for housing fails to meet with the requirements set out in the PPG. The proposed increase of 500 homes would be insufficient to address the concerns raised by the Inspector. Rather the data shows a requirement for between 1,073 and 1,125 dwellings per annum.</li> <li>• <b>Great Shelford 10 Acres, Pembroke College and Balaam Family, U&amp;B, Endurance Estates, Barratt</b> Further Evidence in relation to the OAN to which the Proposed Modification refers is flawed and fails to fully consider economic trends. The Council's housing requirement is not founded on robust evidence prepared in a manner compliant with the NPPF and PPG. The Inspectors' concerns have not been fully addressed and the Council's Housing target still does not meet the OAN. Proposed Modifications are unsound.</li> <li>• <b>NBRLOG, SBRLOG</b> The PBA report is flawed as it: ignores the plans' economic aspirations and the level of housing provision necessary to support this; fails to consider assumptions inherent in demographic modelling used on household formation rates; does not consider land values as a market signal; is dismissive of the affordable housing need. The Plans' housing assumption will result in a deterioration of affordable housing, constrain economic growth and create a shortfall in housing delivery. 15,200 should be provided in Cambridge and 27,000 in South Cambridgeshire. Any unmet Cambridge need to be met in South Cambridgeshire under the duty to cooperate.</li> <li>• <b>Grosvenor</b> Updated assessment of housing need is not considered to be appropriate evidence to justify the plan. Cambridge prices stand 45% above the 2007/08, South Cambridgeshire are at +25%. In E&amp;W prices are c2.5% above 2007/08 peak. Canterbury and Uttlesford currently</li> </ul>		

	<p>c20% above 2007 peak, and Eastleigh is c10% above. Eastleigh is not comparable to South Cambridgeshire. Canterbury is more appropriate for comparison with South Cambridgeshire. South Cambridgeshire uplift should be significantly higher than 20% and a strong case that it should be higher than Canterbury. Cambridge significantly outstrips Canterbury. Uplift for market signals should be significantly higher than 30%.</p> <ul style="list-style-type: none"> <li>• <b>Hopkins Homes</b> Cautiously welcome increase to 19,500. But the plan remains over reliant on new settlements.</li> <li>• <b>MG Homes and Harcourt Developments</b> Evidence underlines the fact that the level of uplift in housing numbers proposed by the Councils is insufficient.</li> <li>• <b>CEG</b> The additional assessment of OAHN does not provide a balance between homes and jobs across HMA. The proposed approach is not justified, effective or consistent with national planning policy. The Councils are promoting homes in locations which do not meet employment needs and consequently do not balance jobs proposed. An integrated approach to identification of need for additional jobs and homes results in a significantly higher OAHN within HMA of 41,000, and this demands spatial pattern of development which focusses on edge of the City.</li> <li>• <b>Scott Properties</b> PBA predicts an OAN of 17,579 for South Cambridgeshire based on DCLG 2012 projections which is below the SHMA figure of 19,000 homes. The higher figure is preferred. The 10% uplift should be applied to the SHMA 19,000 target not to the 17,579 OAN. This gives 20,900 which should be the figure for South Cambridgeshire. Full provision is not made for the extra City Deal 1,000 homes.</li> <li>• <b>Pigeon and LIH</b> The demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes. Significant key market signals; land values and past under delivery have not been considered. No adjustment has been made to take account of the level of affordable housing need. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.</li> </ul>
<b>Councils' Assessment</b>	<u>Note:</u> see the assessment under modification PM/SC/2/H.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/K to the Examination Inspectors.

Proposed Modification: PM/SC/2/L Paragraph 2.39			
Representations Received	Support: 2	Object: 14	Total: 16
Main Issues	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Cambridge PPF</b> Based on past performance, even in the pre-recession period, an average delivery rate of just under 1,000 new homes per annum would appear towards the top end of a realistic estimation of the Council's capacity. Higher than this would be undeliverable.</li> <li>• <b>Taylor Family and Countryside Properties</b> The provision of 19,500 new homes implies an average delivery rate of 975 homes per year, which is less than the Core Strategy 2007 - 1176 pa (2001 to 2011). A total of 7663 homes were built at an average of 766 pa, as a result of the reduced supply during the recession period. The new Local Plan therefore represents a consistent step change in housing delivery over a lengthy period.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>MCA</b> The PBA the assessment of objective assessed housing need fails to meet with the requirements set out in the PPG. From the evidence available the proposed increase of 500 homes would be insufficient to address the concerns raised by the Inspector. Rather the data shows a requirement for between 1,073 and 1,125 dwellings per annum.</li> <li>• <b>Great Shelford 10 Acres, Pembroke College and Balaam Family, U&amp;B, Endurance Estates, Barratt</b> PBA report is flawed because it does not consider economic trends. OAN should be 24,400. Market signals indicate long term undersupply compared to demand. It is not compliant with national guidance.</li> <li>• <b>SBRLOG</b> South Cambs housing target at the lower end of possible options. This would not boost significantly the supply of housing. The housing target for South Cambs should be increased to a minimum of 21,500 dwellings (1,075 dpa), although it was likely that the housing target would need to be higher to meet unmet needs from Cambridge. Support the increase in housing target, but it should be higher to comply with paragraphs 014 to 029 of the NPPF. Request that the housing target for South Cambs in Policy S/5 should be increased, to include meeting any unmet needs from Cambridge through the DtC process. As requested in Modification PM/SC/2/R: Policy S/12, we request that a more robust assessment of housing delivery is undertaken and the housing trajectory is revised accordingly.</li> </ul>		



	<ul style="list-style-type: none"> <li>• <b>NBRLOG</b> The PBA Report does not provide a guidance-compliant assessment of Objectively-Assessed Housing Need. It is flawed because it fails to consider: economic aspirations and the level of housing provision necessary to support this; assumptions inherent in demographic modelling; and land values as a market signal, which point to constrained residential land supply in Cambridge. This is in conflict with the PPG. The housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP. The proposed housing target is not a step change in housing delivery, but demonstrates that some identified housing sites are not delivered in accordance with the housing trajectory and that overall there is under-delivery against the housing requirement.</li> <li>• <b>Grosvenor</b> House prices 45% above 2007/08 peak in Cambridge and 25% in South Cambridgeshire compared to 2.5% rise in England and Wales. Comparator authorities used in PBA report not appropriate. A dwelling uplift to the OAN of significantly more than 30% justified for Cambridge and more than 20% for South Cambridgeshire.</li> <li>• <b>Hopkins Homes</b> Proposed Modifications suggest that the review of OAN leaves a residual number of homes to be allocated of 4,365 homes up to 2031. However, the suggested delivery rate of 975 homes per annum is substantially less than the old 2007 Core Strategy annualised target of 1176 which was persistently not achieved.</li> <li>• <b>Scott Properties</b> PBA predicts an OAN of 17,579 for South Cambridgeshire based on DCLG 2012 projections which is below the SHMA figure of 19,000 homes. The higher figure is preferred. The 10% uplift should be applied to the SHMA 19,000 target not to the 17,579 OAN. This gives 20,900 which should be the figure for South Cambridgeshire. Full provision is not made for the extra City Deal 1,000 homes.</li> <li>• <b>CALA homes</b> The proposed housing target is not a step change in housing delivery, but demonstrates that some identified housing sites are not delivered in accordance with the housing trajectory and that overall there is under-delivery against the housing requirement. South Cambs housing target should be increased to meet unmet needs from Cambridge. A more robust assessment of housing delivery is needed.</li> <li>• <b>Pigeon Land and LIH</b> The level of objectively assessed housing need has been under-estimated. The</li> </ul>
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	demographic projections have not been adjusted to take account of the assumption that household formation amongst younger households is suppressed. Economic growth expectations have not been addressed so there is a misalignment between jobs and homes. Significant key market signals; land values and past under delivery have not been considered. No adjustment has been made to take account of the level of affordable housing need. The full objectively assessed housing requirement for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings.
<b>Councils' Assessment</b>	<u>Note:</u> see the assessment under modification PM/SC/2/H.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/L to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/M Paragraph 2.40</b>			
<b>Representations Received</b>	Support: 2	Object: 10	Total: 12
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Countryside Properties &amp; Taylor Family</b> Support update to housing land supply position.</li> <li>• <b>Hallmark Hotels</b> Support delivery of additional 4365 dwellings alongside existing allocations.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land &amp; LIH</b> South Cambs and Cambridge have separate local plans and should therefore have separate housing trajectories. The fact that the City Deal has been signed does not provide justification for the joint approach to the delivery of housing. This was confirmed by the planning appeals at Waterbeach.</li> <li>• <b>North Barton Road Land Owners Group</b> No action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The South Cambs housing trajectory should be treated with caution and is highly likely to be overly optimistic because historic monitoring data demonstrates less housing is delivered than predicted. Over reliance on new settlements to maintain an adequate housing land supply is a risky strategy. Timetable for delivery needs to be reassessed in detail.</li> <li>• <b>MCA Developments</b> Objectively assessed need fails to meet the requirements – the proposed increase of 500 dwellings is not sufficient to address the concerns raised by the Inspectors. Evidence shows annual requirement of between 1073 and 1125 dwellings necessary.</li> </ul>		

	<ul style="list-style-type: none"> <li>• <b>Barratt Eastern Counties &amp; North West Cambridge Consortium of Landowners, Endurance Estates, Unwins &amp; Biggs, Pembroke College &amp; Balaam Family, Great Shelford Ten Acres and Bidwells</b> Modifications are inaccurate assessment of level of housing supply, which continues to rely on the development of new settlements.</li> <li>• <b>Scott Properties</b> Councils current position suggests that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer). This provides a strong indication that additional housing is required.</li> </ul>
<b>Councils' Assessment</b>	<p>This proposed modification updates housing numbers as a consequence of other proposed modifications and the latest housing trajectory.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p> <p><u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/SC/2/H</p> <p><u>Note:</u> Issues relating to the joint trajectory are addressed under modification PM/SC/2/B.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/M to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/N</b>	
<b>Policy S/6: The Development Strategy to 2031</b>	
<b>Proposed Modification Representations Received</b>	Support: 8 Object: 26 Total: 34
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Countryside &amp; Taylor Family</b> Support removal of restrictions on start dates and flexibility by allowing higher annual rates, as this is consistent with NPPF that requires Local Plans to provide a strategy that can respond flexibly to changing conditions.</li> <li>• <b>Historic England</b> Support modifications proposed relating to development strategy.</li> <li>• <b>North Hertfordshire DC</b> Proposed modifications are not changing the growth strategy and therefore nothing to add to previous comments.</li> <li>• <b>Uttlesford DC</b> No comments.</li> <li>• <b>Urban &amp; Civic</b> Support development strategy update and sustainability appraisal addendum. Inclusion of Waterbeach New Town as part of a balanced strategy is justified. Site is</li> </ul>

	<p>deliverable. Overall benefits of new settlements are considered to be significant compared to incremental or piecemeal Green Belt releases on edge of Cambridge. (65761)</p> <ul style="list-style-type: none"> <li>• <b>RLW Estates</b> Support development strategy update and sustainability appraisal addendum. Support deletion of phasing restrictions and limit on number of dwellings in plan period. Development could come forward earlier and at a higher level than the Council's cautious assumptions in their latest housing trajectory.</li> <li>• <b>Anglian Water</b> Support removal of restrictions to start date provided necessary infrastructure is in place to serve the development.</li> <li>• <b>Rustat Road Neighbourhood Association</b> Support proposed earlier development of these sites.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land &amp; LIH</b> Seeking to bring forward delivery of Waterbeach is not realistic given the amount of required infrastructure, the processes and timescales that will be needed to acquire third party land for the associated infrastructure, and the funding gap for this infrastructure (which was discussed at the examination but still remains despite the updated background technical reports). Development of Bourn Airfield is not sustainable – size means that residents will still need to travel for services, increase in commuting by car despite public transport improvement (will only bring 6-7% modal shift). (65451)</li> <li>• <b>Waterbeach Parish Council</b> (supported by 242 returned questionnaires) Delivery of new settlements must be considered unsound due to significant potential for underfunding as identified in IDS 2013. No recognised strategy for delivery of transport infrastructure on A10 corridor. Any advance of development at Waterbeach and Bourn may put at risk the delivery of Northstowe.</li> <li>• Unrestricted build at Waterbeach by 2031 is not sustainable or viable as infrastructure is not in place. The development will be overbearing on existing village.</li> <li>• <b>MCA Developments</b> Bringing forward phasing of Bourn Airfield will create competition with Cambourne. Market has its own level and most likely outcome will be reduction in anticipated delivery on both sites. Phasing of Bourn Airfield should be left to later in the plan period. (66200)</li> <li>• <b>Gladman Developments</b> Significant concerns with distribution of housing growth – reliance on strategic sites and new settlements at expense of development in other sustainable locations. A cautious approach should be taken to lead-in times and delivery rates.</li> <li>• <b>Cambridge PPF</b> Concerns about sustainability of Bourn</li> </ul>
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	<p>Airfield. Will be dependent on Cambridge and could just be a dormitory development. Will compete with Cambourne. Additional housing might be best re-located to Cambourne so as to build Cambourne to the level that it becomes more self-sufficient.</p> <ul style="list-style-type: none"> <li>• Modifications do not reflect emerging changes to national policy and Government guidance.</li> <li>• <b>Countryside &amp; Taylor Family</b> Viability update – paragraph 2.5.4 assumes that both private and affordable dwellings are same average size. Appendix I should use a finance rate of 7% for both land and build.</li> <li>• Proposals have consequences for existing rural settlements – will be over-run.</li> <li>• <b>CARTER JONAS</b> Bourn Airfield should be deleted. The timetable for delivery is uncertain and unclear level of affordable housing that could be provided despite being key part of development strategy.</li> <li>• <b>Histon &amp; Impington Parish Council</b> Skills shortage leading to slower delivery rates. Council should adopt policies that mitigate developers profit by delaying building. Does not indicate infrastructure deficit that already exists – must place a constraint on number of houses.</li> <li>• <b>Grosvenor &amp; USS</b> Not considered realistic that these developments can start any earlier or will deliver higher rates of development. Delays have happened with Northstowe.</li> <li>• <b>Hopkins Homes</b> Object to reliance on new settlements. Modifications fail to provide certainty about delivery – to guarantee delivery allocate small and medium sized sites in villages with less propensity for delay.</li> <li>• <b>CEG</b> The overall development strategy including a number of allocations and the associated infrastructure remains unjustified. Plans clearly identified a sustainable development sequence which recognises that sustainability benefits of in and on edge of Cambridge are greater than for new settlements and villages. Based on Councils' own evidence, if there is land on the edge of Cambridge that can be developed without compromising the purpose of the Green Belt, it should be released ahead of locations further down the development sequence. Identified a number of concerns that justify further consideration of development strategy. Development at Bourn Airfield should not be supported and Waterbeach should occur only once development has taken place in more sustainable locations. Revised IDS evidence does not address the concerns of the Inspectors over infrastructure delivery and the over reliance of the plan on new settlements</li> <li>• <b>Hallmark Hotels</b> Proposed modification should make clear</li> </ul>
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	<p>the specific location of targeted housing delivery in order to meet identified increase in housing supply. Housing should be promoted in sustainable villages, particularly those which are accessible to Cambridge and offer broad range of facilities (proposes a new allocation in Bar Hill).</p> <ul style="list-style-type: none"> <li>• <b>Bloor Homes Eastern</b> Object to removal of phased approach to new settlements as does not address the fundamental issue that the new settlements rely on the provision of infrastructure for which there is a significant funding gap. As a consequence, there can be no certainty that the new settlements can be delivered as planned, or even at all within the plan period. Waterbeach would require up-front provision of transport infrastructure plus investment in facilities and services such as schools and healthcare. It is essential that there is certainty that this infrastructure is deliverable. New settlements will be competing for transport infrastructure enhancements at the same time. Timescales for the delivery of infrastructure on the A10 corridor does not correlate with the housing trajectory.</li> <li>• More evidence is still required – the additional work undertaken is inadequate. High level of disconnect between transport and land use planning, despite being inextricably linked.</li> <li>• New development sites such as Bourn Airfield and West Cambourne will add to the level of unsustainable modes of transport already evident following the Cambourne development. Sites are too far from major employment and there are no bus routes to these areas.</li> <li>• Infrastructure needs to be in place.</li> <li>• Delivery of new settlements must be considered unsound due to significant potential for underfunding as identified in IDS 2013. No recognised strategy for delivery of transport infrastructure on A10 corridor. Any advance of development at Waterbeach and Bourn may put at risk the delivery of Northstowe.</li> <li>• No practical solutions have been proposed to cope with the huge increase in commuter traffic that would result if Bourn and Cambourne West are allowed.</li> <li>• Should be more emphasis on encouraging employment at satellite sites outside Cambridge and less emphasis on providing more houses.</li> <li>• Allowing Bourn Airfield and Cambourne West to proceed concurrently would cause significant traffic and environmental issues for local residents. Cambourne West should be constructed first.</li> <li>• Not appropriate to reschedule the delivery of Waterbeach when no supporting infrastructure requirements have been</li> </ul>
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attached to the "flexibility" proposed. Specific requirements related to infrastructure should be attached to any rescheduling.

### **Main Issues related to Transport Evidence**

#### **Object**

- Local Plan with proposed modifications and Transport Study will not reduce the need for major transport infrastructure, not minimise the need to travel, not maximise the use of sustainable transport modes.
- Strategy will promote ever greater car use, resulting in increased congestion, delays and journey times / travel distances, with corresponding increases in carbon emissions, deteriorating air quality, and with a detrimental impact on the health and wellbeing of local people. The modelling continues to forecast that between 2011 and 2031 delays in Cambridge will more than double and journey lengths will increase, resulting in severe impacts. It will reinforce existing travel patterns. Not tested if this will harm achievement of planned levels of job growth.
- Councils own evidence demonstrates edge of Cambridge sites offer significantly better mode shares by sustainable modes than new settlements. Could also facilitate city deal schemes. Benefits have been ignored.
- In the City the proportion of households without a car rises from 28% in 2011 to 31% by 2031. This is further evidence that there is a need for a greater amount of edge of Cambridge Development in order to secure a significant contribution to active mode/public transport trips necessary to achieve the modal shift targets
- Mode shares at new settlements low despite significant interventions.
- Evidence base shows that the residual impacts of development are severe and as such it is contrary to the NPPF, and the stated objectives of the draft Local Plans will not be achieved.
- The new and additional transport modelling work continues to lack transparency and clarity. Inconsistency makes it difficult to understand the validity of the emerging findings. It does not provide objective comparative testing of sites on like for like basis.
- Fails to provide further data on the relative impacts of the development scenarios on the highway network in the form of comprehensive journey times for all scenarios, capacity constraints, vehicular numbers and changes in flow on key highway links
- Failed to adequately test alternative quantum of

	<p>development, including variations in site capacities put forward by representors.</p> <ul style="list-style-type: none"> <li>• The CSRMM modelling undertaken for the Local Plan is inconsistent with and contradicts the evidence published in the June 2015 A428 Corridor Study, published as part of the City Deal process. No evidence busway standard can be provided. Benefits assumed in CSRMM will not be achieved.</li> <li>• Modelling runs did not consider phasing of development before infrastructure.</li> <li>• The evidence fails to test the necessary development trigger points for the delivery of transport infrastructure, and how much development can take place prior to infrastructure e.g. on A428 corridor. Lack of certainty over delivery of infrastructure, which is not fully funded. No further evidence has been presented that shows the essential infrastructure is viable or deliverable in the necessary timescales. A10(N) study not completed, therefore uncertainty regarding measures needed for that corridor.</li> <li>• New transport infrastructure for new settlements will impact on Green Belt.</li> <li>• The assessment of sites do not reflect developer proposals. Sites are grouped with no explanation. CEG's proposals at South East Cambridge is contaminated by an unjustified assumption of requirement for a 'Strategic Link Road' between Yarrow Road and Addenbrookes Road.' Cambridge South testing excluded additional link off M11 roundabout.</li> <li>• Questionable assumptions regarding Park&amp; Ride patronage given falling patronage. Car traffic is growing on radial routes. Goals of the Cambridge Access Study would not be achieved.</li> <li>• Unclear which transport measures are included in the Do Minimum and Do Something testing.</li> <li>• Updated transport modelling does not appear to take into account the provisional allocation of land at E1/B.</li> <li>• Does not maximise use of existing infrastructure.</li> <li>• Lack of robust transport modelling does not facilitate a robust SEA/SA process</li> <li>• The Councils' proceeded to undertake the further work on the statement of common ground without engaging with Hearing participants towards a statement of common ground. Does not address questions raised at Examination.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p>This section addresses comments made on:</p> <ul style="list-style-type: none"> <li>• development strategy</li> <li>• infrastructure delivery</li> <li>• viability</li> </ul>



- transport
- sustainability appraisal
- sites outside the Green Belt.

It then responds to points made on the Councils' Transport evidence base.

#### Development Strategy

A number of representatives question the Councils' choices regarding the balance of development between different locations, particularly the allocation of two new settlements rather than sites on the edge of Cambridge or village development.

The development sequence was established by previous plans and, following reconsideration, is continued in the Submitted Local Plans. It remains an appropriate response to planning for the Greater Cambridge area. The Local Plans must determine the balance of growth that takes place at each stage of the sequence. The Councils' Development Strategy Update (RD/MC/060), informed by evidence including the Joint Sustainability Appraisal Addendum (RD/MC/020), considers this balance. It sets out the range of sustainability issues and planning evidence considered by the Councils, the weight applied to those issues, and the reasoning for the preferred approach.

#### *Green Belt versus New Settlements*

The Development Strategy Update (RD/MC/060) and the Joint Sustainability Appraisal Addendum (RD/MC/020) set out how the issue of Green Belt has been considered through plan making, meeting the requirements of paragraphs 84 and 85 of the NPPF to consider the sustainability impacts of developing outside the Green Belt compared with removing land from the Green Belt for development.

Whilst urban extensions to Cambridge offer relative benefits to some sustainability issues over other options, the Councils' evidence continues to highlight the significant harm that would be caused to the purposes of the Cambridge Green Belt if further land were to be released for development. The Councils' position remains that the need for jobs and homes can constitute exceptional circumstances justifying the release of land from the Green Belt but only so far as would not cause significant harm to Green Belt purposes. Green Belt issues are addressed under modification PM/SC/2/C.

The Councils have considered transport issues alongside wider planning issues throughout the plan making process. The Transport Strategy for Cambridge and South Cambridgeshire,

which forms part of the Local Transport Plan, was prepared by the County Council alongside the Local Plans. The Proposed Modifications consultation was supported by the Local Plans CSRM – Cambridge and South Cambridgeshire Local Plans Transport Report, (November 2015) (RD/MC/070), which provided further comparisons of the transport impacts of different strategy options, as well as considering the impacts of the proposed modifications.

This ensured in particular that the relative merits of land on the edge of Cambridge in transport terms compared with the necessary transport infrastructure requirements of new settlements is understood and taken into account in determining the appropriate development strategy. The Transport Report (paragraph 5.64) identifies that new settlements tested would not deliver the mode share of trips by sustainable modes anticipated from edge of Cambridge sites. However, with the provision of the sustainable transport measures proposed in the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC), including park & ride and cycling, this would deliver a significant increase in the proportion of trips made by non-car modes from new settlements.

The Transport evidence is considered to provide a sound evidence base to support plan making, reflecting the requirements of the Planning Practice Guidance. More detailed consideration of representations regarding the transport technical evidence is included in a separate section below.

*More development in villages and the rural area*

A number of representors consider that further development should be allocated in villages, in addition to or as alternatives to sites in the submitted Local Plans. The approach to villages, justified in the Councils' Development Strategy Update (RD/MC/060) paragraphs 4.35 to 4.41, is considered appropriate. A dispersed strategy would not enable the focused delivery of new infrastructure or improvements in transport infrastructure to support travel by sustainable modes. Education provision would be a significant constraint on development in many villages, with schools unable to be expanded to accommodate additional pupils. A wide range of sites were tested through the SHLAA and SA process. A significant number were rejected, for example due to flood risk, or infrastructure constraints such as education. The reasons these sites were not included in the submitted Local Plan remain sound. The Local Plans provide an appropriate balance of development at different levels of the search sequence. The strategy supports some growth at better served villages, though identified allocations where it will support early delivery of sites.

	<p>Evidence continues to demonstrate that the smaller villages are the least sustainable locations for growth other than to meet local needs. Policies in the Submission South Cambridgeshire Local Plan provide flexibility for appropriate development in the rural area to meet local needs, but smaller villages should not be a focus of allocations to meet wider housing needs.</p> <p>The strategy across the two Local Plans seeks to develop land within the urban area of Cambridge where there is capacity, deliver additional development on the edge of Cambridge where it would not cause significant harm to Green Belt purposes, deliver new settlements where there is potential to provide sustainable transport infrastructure to connect with jobs and services, and deliver limited allocations at the better served villages to support rural communities and provide early housing delivery. This approach is considered a sound response to the evidence and the issues raised through the plan making process.</p> <p><u>Infrastructure Delivery</u></p> <p>The Proposed Modifications were informed by an updated Infrastructure Delivery Study (IDS 2015) (RD/MC/080). The IDS 2015 updated previous studies carried out in 2012 &amp; 2013 to inform the Local Plans.</p> <p>The IDS 2015 reviewed the infrastructure needs of the area, including infrastructure needed to support the developments in the Local Plans. It draws on a range of sources, including input from stakeholders and infrastructure providers. It was also informed by the Viability Update 2015 (RD/MC/090), which considered the potential funding that could be secured from developments to support the delivery of infrastructure.</p> <p>The IDS 2015 considers the delivery of transport infrastructure to support growth. A number of representors question the delivery and funding of this infrastructure. The total cost of transport infrastructure schemes, including essential and desirable schemes, exceeds the level of funding identified at this point. This is not unusual when considering a long term strategic plan alongside existing infrastructure deficits that exist within the area.</p> <p>Many of the transport schemes identified perform a wider sub regional role in serving the Greater Cambridge area as well as serving individual developments. Strategic developments will be able to make a contribution to strategic transport schemes as well as on site infrastructure. There are a range of non-developer infrastructure funding sources which will assist the delivery of essential infrastructure in the Greater Cambridge area. The most</p>
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	<p>significant of these is the City Deal. Up to £500m grant funding has been secured specifically designed to provide infrastructure to help unlock growth.</p> <p>A position statement was presented to the City Deal Board on 3 March 2016. This set out the role of the City Deal in supporting the delivery of the development strategy contained in the Local Plans. The intention of the statement is to provide clarity, in light of the representations which have been made, to the Local Plan Inspectors who are examining the Local Plans. The statement is as follows:</p> <p style="padding-left: 40px;">“The City Deal aims to support continued economic growth in the successful Greater Cambridge area. The City Deal document Executive Summary (page 1) says: ‘The Greater Cambridge City Deal aims to enable a new wave of innovation-led growth by investing in the infrastructure, housing and skills that will facilitate the continued growth of the Cambridge Phenomenon. It acknowledges the region’s strong track record of delivering growth and seeks to support those existing, and new, businesses in achieving their full potential.’ It says that the Deal will “accelerate delivery” of housing identified in the Local Plans.</p> <p style="padding-left: 40px;">“As part of that objective, the City Deal will support delivery of the strategy set out in the Cambridge and South Cambridgeshire Local Plans through investment in transport infrastructure, housing delivery and skills. Likewise, the Cambridge and South Cambridgeshire Local Plans will support the City Deal commitments by speeding the delivery of new homes and jobs. Such action is consistent with a key objective of City Deal, namely the delivery of transport schemes necessary to support continued economic growth, including through improved network connectivity and by supporting the sustainable development strategy included in the submitted Cambridge and South Cambridgeshire Local Plans.</p> <p style="padding-left: 40px;">“The City Deal document<sup>1</sup> recognises that Cambridge City Council and South Cambridgeshire District Council, along with Cambridgeshire County Council as the Transport Authority, “have worked closely together on new local plans and associated transport strategy and have aligned plan making processes to achieve the benefits of what amounts to a single overarching development, infrastructure and delivery strategy for Cambridge” (City Deal document<sup>1</sup> page 7). Furthermore, as part of the City Deal arrangements, the Councils have agreed to prepare a joint</p>
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	<p>Local Plan and Transport Strategy starting in 2019.</p> <p>“The City Deal has secured a commitment for up to a total of £500 million of Government funding. The £100 million that has already been secured as the first tranche of funding, is a large sum that has enabled studies to be commissioned and initial consultations held on major transport schemes and will thereafter fund these capital works.</p> <p>“The City Deal Executive Board has agreed a list of infrastructure schemes for delivery over its 15 year period, drawn from the Transport Strategy for Cambridge and South Cambridgeshire (January 2015). Amongst those included in the list are those schemes identified in the submitted Cambridge and South Cambridgeshire Local Plans as necessary to support the sustainable development strategy. This forms part of the City Deal commitment to accelerate the delivery of planned homes in accordance with the Local Plans.</p> <p>“On the basis of an assessment of a combination of positive economic impact and deliverability a number of schemes have been prioritised for Tranche 1 to be delivered in the first five years of the City Deal 2015-2020. Options have now been developed for all the Tranche 1 schemes. Tranche 1 includes those schemes that will facilitate the early delivery of development in the A428 corridor (including Cambourne West and Bourn Airfield). Indeed, the Tranche 1 schemes and implementation programme demonstrate the commitment of City Deal to fund and deliver transport schemes that will support the delivery of major developments identified in the Local Plans even where this may be in advance of, and help facilitate, the grant of planning permission for those developments.</p> <p>“It is expected that appropriate contributions towards the costs of the transport schemes that has already been incurred will be recovered subsequently from those developments, through the grant of planning permission and accompanying planning obligations.</p> <p>“It is recognised that the anticipated total cost of proposed schemes exceeds the sums identified through City Deal funding for Tranche 1. However, City Deal funding is not the only anticipated source of funding for Tranche 1 schemes and other sources of funding for those schemes is expected. In particular, it is anticipated and expected that</p>
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	<p>City Deal monies will be supplemented by funding from other sources, including section 106 contributions (as discussed below) and from the Growth Fund. £9 million has already been secured in principle from the Growth Fund towards public transport improvements in the A428 corridor. Growth Deal funding is secured via the Greater Cambridge Greater Peterborough Enterprise Partnership, which is also a City Deal partner, therefore demonstrating a joined up approach to infrastructure funding in the Greater Cambridge area.</p> <p>“Furthermore, in terms of additional funding for infrastructure schemes, appropriate developer contributions are of course expected from those strategic developments provided for in the Local Plans that require particular infrastructure schemes as part of their delivery. These will be sought by City Deal partners in their role as local and county planning authorities. Through the planning process, those promoting strategic developments will be required to make appropriate, proportionate and reasonable contributions to on and off site infrastructure, including transport infrastructure, and affordable housing, guided by development viability, so as to secure the delivery of new settlements that are sustainable. It is the intention that such developer contributions as are secured through the planning process will be added to the City Deal funding, which is directed to securing the delivery of the required infrastructure to meet the objectives of the Local Plans development strategy, including the objective of delivering a substantial amount of housing, including affordable housing, at the new settlements.</p> <p>“The City Deal partners are wholly committed to delivery of the infrastructure programme for the benefit of existing and future residents and businesses through the provision of an enhanced transport network that provides good quality connectivity between homes and jobs, including supporting and securing new development provided for in the Local Plans through the delivery of key infrastructure schemes.”</p> <p>The City Deal schemes include those intended to provide high quality public transport links from the major developments to Cambridge and destinations on the edge of Cambridge. This includes public transport improvements along the A428 corridor and orbital links to the north and south – to the Science Park/CNFE to the north via existing and approved developments and to Cambridge Biomedical Centre to the south via a western orbital route already subject to consultation.</p>
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On the A428 corridor, the busway scheme, prioritised for City Deal tranche 1 funding, has been explored through an Interim Report considering options, and subject to public consultation in November 2015. Results were reported back to the City Deal Executive Board on 3 March 2015<sup>9</sup>. A recommendation report to the Executive Board is intended to be submitted in September 2016 which will recommend an option(s) for further development and further consultation. The programme anticipates start of construction of the scheme east of Madingley Mulch in August 2018, for completion in 2020.

Some representors have raised issues regarding transport infrastructure need to deliver growth anticipated in the first 5 years of the plan. The new settlements at Waterbeach and Bourn Airfield are included in the housing trajectory beyond that period. The housing trajectory includes only 200 dwellings at Cambourne West by 2021.

The County Council recognises that there will be pressure to deliver development in the A428 corridor prior to implementation of the full City Deal proposals. The County Council has advised that it will therefore work with developers to identify what interim measures could be provided by this development to support early housing delivery. These interim measures will need to complement the wider corridor proposals, must not be abortive work, and are likely to include improved provision for cyclists, potentially seeking to address pinch points that impact upon bus journey times, and possibly localised highway works. Depending on what detailed assessment of these interim measures shows, and the rate at which development actually happens, there may be a need to accept some very short deterioration in travel conditions pending delivery of the larger scale corridor works. This will all be addressed in determining the current planning application at Camborne West, which is anticipated to be determined shortly, and the Inspectors will be advised of the outcome.

The A10(N) corridor has not been included in the tranche 1 prioritisation. However, in recognition of the change in circumstances in relation to timing of development at Waterbeach new town and preparation of an Area Action Plan for Cambridge Northern Fringe East, an A10(N) Corridor Study has commenced which can inform prioritisation of future tranches. This is considering transport interventions on the corridor, and their phasing relative to growth. The study will be completed in summer 2016.

<sup>9</sup> Report to City Deal Board 3 March 2016  
[http://www.gccitydeal.co.uk/citydeal/download/downloads/id/180/executive\\_board\\_report.pdf](http://www.gccitydeal.co.uk/citydeal/download/downloads/id/180/executive_board_report.pdf)

Alongside this work, to inform the plan making process, Cambridge City and South Cambridgeshire District Councils commissioned consultants to prepare reports on the constraints and deliverability of transport schemes on the A10(N) Corridor (RD/MC/074) and the A428 corridor (RD/MC/073). This evidence has confirmed that there are no overriding constraints that would prevent the transport interventions being delivered. The exercise also did not identify any constraints that would result in abnormal costs not previously anticipated.

One representor identifies risks associated with delivery of Highways England schemes on the A14 and A428. The A14 DCO examination result is anticipated in the spring. Highways England are fully committed and continue preparatory work, and subject to the decision still anticipate completion in 2020. An element of local funding towards the scheme has already been committed by the Local Authorities. At the Matter 4 hearing the Councils, together with the County Council, advised the Inspector that the A428 Caxton to Black Cat improvements are not considered essential to the delivery of the development strategy. The Government announced funding for the A428 Black Cat to Caxton dualling scheme in December 2014, and anticipates delivery late in the period 2015 to 2020. Highways England have commenced work on the project.

With regard to the phasing of infrastructure to meet the needs of new settlements as they grow, the IDS 2015 identifies when infrastructure would be needed, this would need to be further explored and detailed through the Area Action Plan / planning application process, to ensure infrastructure is available when it is needed, reflecting policy SC/4 of the Submission South Cambridgeshire Local Plan. There is no evidence that bringing forward other sites would put the delivery of Northstowe, or further development at Cambourne at risk. However, as recommended by the IDS 2015, the Councils intend to commence a Utilities Forum, to assist the coordination of infrastructure delivery and support the delivery of the major developments.

In order to ensure the Local Plans fully explain the reasons for the development strategy, it is proposed to add further text to the both plans, explaining the further work that was undertaken and the reasons for the approach taken to the strategy. This is proposed as a revision to Modification PM/SC/2/C for the South Cambridgeshire Plan, and PM/CC/2/E for the Cambridge Plan.

Viability

The Councils have considered viability issues, during the plan



	<p>making process and specifically to consider the impacts of the proposed modifications. The Cambridge and South Cambridgeshire Local Plans Viability Update (November 2015) (RD/MC/090) provides a strategic viability assessment appropriate to this stage of the planning process. The Viability Update informed the Infrastructure Delivery Study, which considered the delivery and funding of infrastructure.</p> <p>One representor considers that the Waterbeach new town has not been assessed in the Viability Update. However, the document clearly sets out its approach to this new settlement (section 2.5 and paragraphs 3.4.3 to 3.4.5) which is appropriate at this stage.</p> <p>One representor considers that alternative sites should have also been subject to viability assessment. There is no requirement on Local Planning Authorities, and it would be impracticable, to carry out detailed infrastructure and viability assessments of rejected strategies or sites.</p> <p>Each site will have factors that both positively and negatively influence the development values that may be achieved. The Councils' viability evidence has considered a range of locations, including sites in and on the edge of Cambridge (including land north of Cherry Hinton). The influence of higher house prices in Cambridge are evident in the non-strategic sites viability indications. It should be kept in mind, however, that house prices are not the only factor, so that land values, development costs and a wide range of variables are likely to come into play from site to site.</p> <p>One representor (65832) raises some technical issues regarding the methodology used in the Viability Report. Paragraph 2.5.4 of the report explains the approach used to calculate an indicative surplus for planning obligations in addition to affordable housing. The consultants ran the appraisal to produce a profit residual (sum remaining for profit), by fixing the land costs input. However, the aim was to assess what remained for s.106 once a certain level of profit had also been taken into account – to avoid circularity. So this was done by then entering s.106 costs into the appraisal iteratively until the profit adjusted to a manually calculated level. In the case of the example noted by the representor, that pre-determined level was approximately 17.1% of GDV (blended across the market and affordable homes). This was arrived at by taking the total market development value (GDV) for a phase and multiplying that by 20% (representing the profit on the market development). Similarly the total affordable housing development value was multiplied by 6% (representing the profit on the affordable homes development from a phase). The sum of those two figures (two elements of profit added together i.e. the profit</p>
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total) was then divided by the total GDV to get to a blended profit rate expressed as percentage of the total (combined) GDV – i.e. in this case 17.1%. In the Council’s consultants’ experience, a blended profit level in the order of 17% GDV is a reasonable assumption for the purpose. The consultants also note that in the example picked out by the representor, when viewed as a proportion of cost, the 17.1% GDV profit is equivalent to more than 20% (on cost) and so would exceed that as another form of profit benchmark that may be referred to. The 7% finance rate assumption applies to the smaller sites which Appendix I focusses on. The representor correctly notes that a 6.5% assumption has been used within the current stage strategic site appraisals. In both cases these are considered reasonably representative of the range of assumptions seen from experience in practice; those vary, with lower rates also potentially relevant.

With regard to the delivery of affordable housing, planning policies provide a degree of flexibility, allowing variations to the scale of affordable housing sought at a site specific stage, subject to viability. In certain specific circumstances, it may be appropriate and necessary to consider the balance of infrastructure funding across a range of issues to enable delivery. The point in the economic cycle may well also have a bearing, noting for example the pick-up in the market in the last few years. There is nothing unusual about this. The Councils note that there are fundamental potential changes to affordable housing being considered at a national level at present, all of which could alter viability equations – in some respects positively.

Sustainability Appraisal

The Sustainability Appraisal Addendum (SAA) appropriately considers a range of sites and strategy alternatives related to the development sequence, and provides information on the economic, social and environmental impacts of the different options, including comparisons of edge of Cambridge development with new settlements. The SAA sets out the reasons for the Councils’ preferred approach, and the weighting of different sustainability issues. It concludes that in combination with the submitted Sustainability Appraisals Reports the Local Plans are supported by a comprehensive sustainability appraisal which meets the requirements of the SEA Regulations.

Issues raised in representations to the current consultation regarding the Sustainability Appraisal Addendum (SAA) are considered in a separate schedule.

Sites outside the Green Belt

	<p><i>Alternative sites</i></p> <p>A number of representations to the Proposed Modifications consultation propose changes to the strategy to allocate alternative sites on the edge of Cambridge or at villages, and put forward specific sites. Many of these relate to representations made at the Proposed Submission consultation stage and are already before the examination. These have been considered through the plan making process, and subject to Sustainability Appraisal, and the Councils have provided reasons why they have not been included in submission Local Plans. Where there are significant variations to existing omission sites submitted in the new representations, for completeness these have been appraised and are included in the SAA. One entirely new site is proposed in Bar Hill (65976). Whilst the Council's view is that this representation does not appropriately relate to the Proposed Modifications consultation and the issues raised by the Inspectors, it has been registered and an assessment undertaken in the SAA on a without prejudice basis. It is not considered that any of the amended or new sites warrant further main modifications.</p> <p><i>Cambourne West Planning Application</i></p> <p>At time of writing a planning application has been submitted for Cambourne West. This reflects the developer's representation to the Local Plan examination for a larger allocation on land north west of Lower Cambourne for 2,350 dwellings. Together with the land within the Business Park in the submitted Local Plan allocation, the sites could provide a total capacity of 2,590 dwellings. The application will be considered on its merits through the planning application process. If the larger site was approved, it would increase flexibility in housing land supply. It is not considered that it would justify removal of any other sites in the Local Plans.</p> <p><u>Response to Comments on Transport Evidence Base</u></p> <p>The Councils consider that the Transport evidence base is robust and transparent. It meets the requirements of National Planning Practice Guidance, and provides information to inform the Sustainability Appraisal.</p> <p>The Transport Report responds the Inspectors Letter (May 2015) by providing further information on the transport implications of different development strategy options, including comparisons of strategy options which include development on the edge of Cambridge, and sustainable transport options which can support new settlements.</p> <p><i>Testing Transport impacts of Strategy Options</i></p> <p>The testing of different scenarios in phase 2 looked at a range of</p>
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strategy scenarios. This included development focused at a number of different broad locations around the edge of Cambridge as compared to developing at new settlement locations or in villages. The modelling was informed by developments proposed to the Councils through the plan making process, but it was not intended to compare exact quanta of development in the different scenarios, but to test the varying development strategy choices in so as to better understand the transport implications.

As well as comparing the overall transport impacts of the different model runs, the transport impacts of new major developments associated with each strategy were drawn out in paragraphs 5.58 to 5.69 of the Local Plan transport Report.

The Councils consider that the modelling work appropriately considers the benefits and dis-benefits of developing in different areas around Cambridge and South Cambridgeshire, as well as the transport challenges of these developments. The evidence base is proportionate.

*Identifying the preferred strategy*

NPPF paragraph 30 requires Local Planning Authorities to support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. However, as recognised in government guidance including the wider NPPF, a range of economic, social and environmental issues must be considered through plan making. It does not require transport to be maximised above all other considerations.

The Councils considered the Transport Report, alongside a range of other planning evidence and the Sustainability Appraisal, when considering the preferred development strategy. This is documented in the Development Strategy Update RD/MC/060 paragraphs 4.42 to 4.69), and the reasons for the preferred approach are also documented in section 9 of the Sustainability Appraisal Addendum 2015 RD/MC/020.

The development strategy supported by the LTP / TSCSC offers significant benefits in terms of delivering sustainable travel both for planned and existing development. This was taken into account in deciding that exceptional circumstances to review the Green Belt to develop land where there would be significant harm to the purposes of the Green Belt do not exist. The Councils have considered the sustainability implications of further major development on the edge of Cambridge. The release of larger sites would cause significant harm and outweighs the benefits in terms of accessibility, and have not been included in the Local Plans.

	<p>Across Greater Cambridge the modelling work shows transport issues of similar magnitude which need to be addressed under all the development scenarios. Whilst there are differences in site specific performance in terms of mode share, due to the level of committed development, overall differences in the impacts of different strategy choices are more limited (see Transport report paragraphs 5.49 to 5.57). The Councils recognise the benefits, in transport terms, of the development options on the edge of Cambridge. However, the Councils consider that the negative impact on the Green Belt outweighs these benefits. The focus on new settlements will provide opportunities to further minimise traffic growth through the introduction of sustainable travel opportunities and internalisation of trips, and this will also bring wider benefits to other communities along the corridors.</p> <p>The Transport Strategy measures proposed have a beneficial impact on travel behaviour in the two districts. These measures directly cause non-car trips into Cambridge to grow at double the rate they would otherwise be expected to (26% compared with 13%). The growth in car trips into Cambridge is reduced by 11% in the AM peak. The measures have the added impact of reducing the total trips into Cambridge making the City more accessible overall. This clearly shows that the Transport Strategy improves trips by public transport, cycling and walking. The Councils do not consider the residual impacts of development to be severe.</p> <p>The Transport Strategy included in the Transport Strategy for Cambridge and South Cambridgeshire includes a range of measures to support walking, cycling, and public transport, as well as highway measures where appropriate. Park &amp; Ride forms an important element of the strategy. The recent fall in patronage at the park and rides follows the introduction of a charge to park at these sites. The County Council always anticipated a fall in patronage, and expects that user numbers will start to rise again once people are used to this charge.</p> <p>The Strategy does not simply reinforce existing transport patterns, but seeks to provide realistic alternatives to the car to benefit existing as well as new population. The transport strategy will enable businesses in Cambridge and South Cambridgeshire to continue to grow, and deliver the jobs anticipated by the local plans.</p> <p>The Transport Report appropriately considers the strategic measures needed to support growth, and testing using strategic modelling to support plan making. As detailed in the Infrastructure Delivery section of this response, further work is already underway</p>
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	<p>to refine these measures, and address phasing issues in more detail.</p> <p>Transport measures considered through the Transport Report are already being prepared through the City Deal process, in order to help deliver the growth strategy. This includes measures on key transport corridors, and well as the City Centre Access Study, which will recommend transformative improvements affecting general vehicular traffic in the City.</p> <p><i>Technical Issues Regarding Transport Modelling</i></p> <p>The Do Minimum runs look at the impact of the development without necessary infrastructure to mitigate the transport impacts. These runs show that additional infrastructure is necessary to support all development options that were considered. The ‘Do Minimum’ tests all have common supply side infrastructure, which does not include the ‘Do Something’ measures listed in the right-hand column of the table in B.3. of the Transport Report. Section B.2 lists measures which are common to the Do Something runs. It is acknowledged that the text at the start of section B.2 could be clarified by saying ‘present in all Do Something modelling runs’. The Do Minimum runs included only committed transport upgrades.</p> <p>The modelling undertaken considers the potential mitigation measures that could be applied in the ‘do-something model runs’. The schemes tested reflect the benefits that can be achieved through the City Deal Schemes at a strategic level appropriate to plan making. The assumptions used to undertake this modelling provide an appropriate indicator of the scheme benefits. The schemes will be refined as they are developed through the City Deal Web Tag process. For example, the 2015 A428 Corridor Study is an Options report includes a number of route options. The Councils are confident that the modelling work undertaken is a reasonable representation of proposed interventions in this corridor and that the modelling results support the preferred development strategy. While the potential final option to be introduced into this corridor is yet to be decided, options which included the single direction inbound priority measure schemes do not appear to significantly reduce the patronage of the scheme when modelled. The Councils are confident that the modelling work undertaken is a reasonable representation of proposed interventions in this corridor and that the modelling results support the preferred development strategy.</p> <p>In order to test alternative sites some assumptions had to be made, for all sites in respect, potential highway access points and accompanying infrastructure. The access and mitigation measures</p>
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	<p>modelled in the phase 2 model runs are those determined by Local Transport Authority to be the likely appropriate measures. For sites of significant scale it would not be reasonable to assume negligible levels of highway access so assumptions had to be made at that time on potential access proposals.</p> <p>For South East Cambridge, it was determined that there would likely need to be access to the north in the vicinity of Yarrow Road and access to the south / west via Babraham Road. As a working assumption it also assumed that there would be some improved connectivity onwards towards the strategic highway network given that access to the strategic road network from the site is currently not ideal. This is not seeking to undermine the site's "sustainability benefits" but simply seeks to represent the likely need for improvements in highway capacity in that broad corridor given that such movements are unlikely to be catered for in significant numbers by sustainable transport options.</p> <p>Following the Do Minimum runs the Local Highways Authority advised, in consultation with the Transport consultants, the likely indicative transport mitigation measures necessary for the developments being tested. These were included in the Do Something runs. These are not considered arbitrary, but a reasonable response to the developments being modelled to appropriately consider the potential for mitigation. Of course, in practical terms, the details of these schemes might differ as details are worked up through subsequent planning application processes but the assumptions made are considered wholly reasonable for the purposes of modelling and plan-making at this stage.</p> <p>The assumptions when considering the modelling of sites were not made to promote car use; they were simply taken to recognise that some level of local highway investment might be required in order for the site to function reasonably in transport terms, across all modes of transport.</p> <p>A number of representors consider specific variations of model runs should be undertaken for their specific sites. The Councils are required to produce a reasonable and proportionate evidence base. Through the three phases of modelling, testing of alternatives and the preferred option, they have developed an appropriate evidence base to inform plan making. Running multiple additional model runs to test variations on individual omission sites would be disproportionate and impracticable. The Councils consider that aggregating sites for the purposes of scenario testing is wholly reasonable for the purposes of plan-making.</p>
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	<p>A range of information is provided on the relative impacts of the various scenarios tested through the model runs, allowing appropriate comparison and information on their impacts.</p> <p>Some representors query the phase 3 model run, which tested the preferred approach, and whether it fully addressed the sites identified in Proposed Modifications. As the Transport Report states, this included site the increased development north of Cherry Hinton, and detailed the mitigation measures that were assumed in both the 'do nothing' and 'do something' model runs. The provisional allocation south of Cambridge Biomedical Campus was not included in the updated transport modelling; the Councils will consider further transport modelling work to support this potential allocation should it be advanced further through the Local Plan process.</p> <p><i>Statement of Common Ground</i></p> <p>Following Examination Matter 7 (Transport), the Councils met with the participants towards a statement of common ground. Participants were invited to indicate what additional information they felt they required regarding the transport modelling work undertaken. This was provided in the document - CSRМ Modelling Summary Report for Cambridge and South Cambridgeshire Local Plans Supplementary Technical Note, May 2015 (RD/MC/072).</p> <p>As a result of the Inspectors Letter (May 2015) the Councils commissioned additional transport modelling, published in November 2015 - Local Plans CSRМ Cambridge and South Cambridgeshire Local Plans Transport Report (RD/MC/070). Being aware of the particular requests of the Mater 7 participants, an additional report was published at the same time which provided from the new model runs the information previously requested - CSRМ Technical Modelling Report for Cambridge and South Cambridgeshire Local Plans Supplementary Technical Note, November 2015 (RD/MC/071).</p> <p>The Councils have cooperated by providing additional information required to enable statements of common ground to be prepared, and work on statements of common ground will continue. The Councils have endeavoured to provide as much information as possible to participants to the extent that is practicable and proportionate to do so. The Councils remains committed to agreeing common ground with other participants where those participants themselves are also similarly committed to that process.</p> <p><u>Note:</u> Removal of phasing restrictions on Waterbeach and Bourn Airfield are addressed under modification PM/SC/2/R.</p>
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<b>Approach to Proposed Modification</b>	Submit proposed modification PM/SC/2/N to the Examination Inspectors.
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<b>Proposed Modification: PM/SC/2/O</b>			
<b>Figure 2: Key Diagram for Cambridge and South Cambridgeshire</b>			
<b>Representations Received</b>	Support: 0	Object: 7	Total: 7
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• None.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Employment allocation E/2 land east of Peterhouse Technology Park. Council Green Belt review flawed. The allocation should remain as proposed in the submitted Local Plan. Proposed boundary fails to follow recognisable physical feature.</li> <li>• Land north of Cherry Hinton. Latest transport and infrastructure studies do not support chosen locations for housing, including Land North of Cherry Hinton. Support Plans which maximise development on edge of Cambridge in principle, but insufficient transport and infrastructure evidence to justify increased allocation in this location during plan period. Council does not explain why increase is justified in the reasons for this main modification..</li> <li>• Employment allocation E/1b land south of Cambridge Biomedical Campus. SCDC states there is no shortage of employment land for high-tech R&amp;D but has not demonstrated why the locational benefits of developing this site outweigh the amenity value of the Green Belt.</li> <li>• Employment allocation E/1b land south of Cambridge Biomedical Campus. Land south of CBC is provisionally allocated for employment but we are unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt. Further investigation will be required into the delivery and sustainability of the provisional allocation. The provisional allocation of land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to be located in close proximity to CBC and Addenbrooke's.</li> <li>• Employment allocation E/1b land south of Cambridge Biomedical Campus. The modification is not justified, as the arguments about the value of this land to the Green Belt given in the Inner Green Belt Review 2015 are flawed. Will be highly visible from the Gog Magog hills, too close to Nine Wells, well used area for recreation.</li> <li>• Employment allocation E/1b land south of Cambridge</li> </ul>		

	Biomedical Campus. This is an important field for 2 red list birds (yellowhammer, grey partridge) and has tall substantial hedges around it which must be protected. Choosing a field at random like this is bad practice: it is only 40m from Nine Wells Nature Reserve and should retain its full Green Belt protection. I have seen no evidence that extra employment land is needed in this area.
<b>Councils' Assessment</b>	See assessments in relation to: <u>Employment allocation E/1</u> – PM/SC/8/C <u>Land north of Cherry Hinton</u> – PM/CC/3/A, PM/CC/B/A, PM/CC/Policies Map/A, PM/SC/3/A <u>Land south Cambridge Biomedical Campus</u> – PM/SC/8/A
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/O to the Examination Inspectors.  For provisional modification relating to Cambridge Biomedical Campus Expansion, see approach under modification PM/SC/8/A.

<b>Proposed Modification: PM/SC/2/P</b>			
<b>Provisional Modification: Paragraph 2.44 relating to Cambridge Biomedical Campus Extension</b>			
<b>Representations Received</b>	Support: 0	Object: 5	Total: 5
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• None.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Building on land within 30 metres of a nature reserve is unsustainable, delete allocation from the plan.</li> <li>• <b>Gt Shelford Parish Council</b> believe that it has not been demonstrated that any benefits of the allocation of this site outweigh the harm done to the Green Belt.</li> <li>• <b>Pigeon Land and LIH</b> No exceptional circumstances justifying the release of this land from the Green Belt. Further investigation will be required re delivery and sustainability of the provisional allocation. The land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to located in close proximity to CBC and Addenbrooke's.</li> <li>• <b>Trumpington Residents Association</b> The modification is not justified, as the arguments about the value of this land to the Green Belt given in the Inner Green Belt Review 2015 are flawed and the Council has failed to demonstrate that there are exceptional circumstances for the need for jobs at this location.</li> <li>• Oppose loss of Green Belt. Highly visible from Gog Magog hills. Important recreation area. Too close to Nine Wells.</li> </ul>		
<b>Councils'</b>	See the assessment under modification PM/SC/8/A.		

<b>Assessment</b>	
<b>Approach to Proposed Modification</b>	See the proposed approach under modification PM/SC/8/A.

<b>Proposed Modification: PM/SC/2/Q Paragraph 2.45</b>			
<b>Representations Received</b>	Support: 3	Object: 11	Total: 14
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Countryside Properties &amp; Taylor Family</b> Support amendment to ensure consistency with PM/SC/2/N and removal of reference to 4370 homes being provided in the two new settlements in the plan period.</li> <li>• <b>RLW Estates</b> Support removal of phasing restrictions at Waterbeach. Do not consider Waterbeach will be in direct competition with Northstowe.</li> <li>• <b>CPRE</b> Supports more flexible approach to start of development at new settlements – appropriate provision of infrastructure and facilities will also need to be brought forward.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land &amp; LIH</b> Seeking to bring forward delivery of Waterbeach is not realistic given the amount of required infrastructure, the processes and timescales that will be needed to acquire third party land for the associated infrastructure, and the funding gap for this infrastructure (which was discussed at the examination but still remains despite the updated background technical reports). Development of Bourn Airfield is not sustainable – size means that residents will still need to travel for services, increase in commuting by car despite public transport improvement (will only bring 6-7% modal shift).</li> <li>• <b>Waterbeach Parish Council</b> (plus 242 returned questionnaires) Delivery of new settlements must be considered unsound due to significant potential for underfunding as identified in IDS 2013. No recognised strategy for delivery of transport infrastructure on A10 corridor. Any advance of development at Waterbeach and Bourn may put at risk the delivery of Northstowe.</li> <li>• Unrestricted build at Waterbeach by 2031 is not sustainable or viable as infrastructure is not in place. The development will be overbearing on existing village.</li> <li>• <b>MCA Developments</b> Bringing forward phasing of Bourn Airfield will create competition with Cambourne. Market has its own level and most likely outcome will be reduction in anticipated delivery on both sites. Phasing of Bourn Airfield should be left to later in the plan period.</li> </ul>		

	<ul style="list-style-type: none"> <li>Majority of 19,500 dwellings identified, therefore small village developments are not needed to accomplish this and so should not be permitted.</li> <li><b>Hallmark Hotels</b> Would encourage a policy that promotes residential development in villages – this can offer sustainable development.</li> <li>Infrastructure needs to be in place before development starts.</li> <li>Delivery of new settlements must be considered unsound due to significant potential for underfunding as identified in IDS 2013. No recognised strategy for delivery of transport infrastructure on A10 corridor. Any advance of development at Waterbeach and Bourn may put at risk the delivery of Northstowe.</li> <li>There will be sufficient homes in West Cambourne to ensure that Bourn Airfield is not required. Development at Bourn Airfield should not start until late in the plan period.</li> <li>Developments at Northstowe, Bourn and Cambourne (which have better road and bus access to Cambridge) should be completed before Waterbeach is developed. Road and drainage improvements needed before Waterbeach new town can be started.</li> </ul>
<b>Councils' Assessment</b>	<p>Proposed modification reflects the removal of phasing restrictions regarding the new settlements proposed in modifications to Policy S/6, S/12, SS/5 and SS/6.</p> <p><u>Note:</u> Removal of phasing restrictions on Waterbeach and Bourn Airfield are addressed under modification PM/SC/2/R.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p> <p><u>Note:</u> Issues regarding infrastructure provision are addressed under modification PM/SC/2/N.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/Q to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/R</b>			
<b>Policy S/12: Phasing, delivery and Monitoring</b>			
<b>Representations Received</b>	Support: 4	Object: 33	Total: 37
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li><b>Historic England</b> Support modifications proposed relating to development strategy.</li> <li><b>Urban &amp; Civic</b> Support joint housing trajectory, however trajectory shows cautious delivery of new settlements. Accept that a conservative approach to delivery of new</li> </ul>		

	<p>settlements is less risky in relation to delivery of plan as a whole, however committed to earlier delivery and faster rate.</p> <ul style="list-style-type: none"> <li>• <b>RLW Estates</b> Support deletion of phasing restrictions – welcome reason for change being promoters able to commence sooner and acknowledgement of cautious approach having been taken in housing trajectory.</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Support modification that confirms the joint trajectory for purposes of phasing housing delivery and removal of reference to Bourn Airfield not starting before 2022.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Barratt Eastern Counties &amp; North West Cambridge Consortium of Landowners, Endurance Estates, Unwins &amp; Biggs, Pembroke College &amp; Balaam Family, Great Shelford Ten Acres and Bidwells</b> Joint trajectory does not comply with NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against <u>their</u> housing requirements. The two Councils are still proceeding with separate plans, with separate identified sites to meet their individual housing requirements. There has been no cross boundary sharing of housing needs. The proposed approach has been introduced late in the plan making process to mask deficiencies in the Councils housing land supply in the early part of the plan period. Support removal of arbitrary phasing dates for Waterbeach and Bourn, however based on experience of Northstowe it is considered that the assumed start dates are ambitious and further caution should be exercised.</li> <li>• <b>Cambridgeshire County Council, CALA Homes, Quay Estate, Shelford Investments Ltd, North Barton Road Land Owners Group, and Ely Diocesan Board of Finance</b> Request all references to joint trajectory are deleted. NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual LPAs. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils. No action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The South Cambs housing trajectory should be treated with caution and is highly likely to be overly optimistic because historic monitoring data demonstrates less housing is delivered than predicted.</li> </ul>
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	<p>Over reliance on new settlements to maintain an adequate housing land supply is a risky strategy. Timetable for delivery needs to be reassessed in detail.</p> <ul style="list-style-type: none"> <li>• <b>Hopkins Homes</b> Object to reliance on new settlements. Modifications fail to provide certainty about delivery – to guarantee delivery allocate small and medium sized sites in villages with less propensity for delay.</li> <li>• <b>Commercial Estates Group</b> The Councils are committed, via the City Deal and the underlying rationale for the Joint Trajectory, to an early review of the Local Plans but this is not captured anywhere within the plans themselves.</li> <li>• <b>Scott Properties</b> Councils current position suggests that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer). This provides a strong indication that additional housing is required.</li> <li>• <b>Hallmark Hotels</b> Support a more holistic approach to housing delivery and consider that housing delivery for South Cambs should not be focussed on the latter part of the plan period.</li> <li>• <b>Bloor Homes Eastern</b> Paragraph 49 of the NPPF is clear that local authorities should maintain a rolling five year supply of housing land in line with its own objectively assessed need. The joint trajectory is ultimately a response to the fact that South Cambs cannot maintain a rolling five year housing land supply until several years into the plan period. Need to allocate sites in sustainable rural settlements to boost housing supply in the early years of the plan period - alternative approach which is consistent with the NPPF and which would assist South Cambs in meeting its requirement during the early part of the plan. Adopting a joint trajectory would mean neither plan could stand 'on its own two feet', raising further concerns over the soundness of this approach.</li> <li>• <b>HCA</b> Needs proper scrutiny to understand impacts on Northstowe and other strategic sites. Councils confident capital funding is available through City Deal, however Inspectors need to consider implementation and delivery of transport and other infrastructure improvements in context of competing demands were three new settlements to overlap. Will there be resources to cope with the delivery needs of all sites combined? Object to assumption that phase 3 of Northstowe will not come forward in the plan period, and therefore IDS does not include assessment of needs of this site. HCA should have been consulted re projections for build out of phase 3.</li> <li>• Unrestricted build at Waterbeach by 2031 is not sustainable or viable as infrastructure is not in place. The</li> </ul>
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	<p>development will be overbearing on existing village.</p> <ul style="list-style-type: none"> <li>• Removal of restriction on level and quantum of development is not a strategic approach. It is unclear whether there is sufficient funding in place to deliver infrastructure for this development. Could lead to much higher quantum of development in the plan period.</li> <li>• <b>Pigeon Land &amp; LIH</b> South Cambs and Cambridge have separate local plans and should therefore have separate housing trajectories. The fact that the City Deal has been signed does not provide justification for the joint approach to the delivery of housing. This was confirmed by the planning appeals at Waterbeach. Seeking to bring forward delivery of Waterbeach is not realistic given the amount of required infrastructure, the processes and timescales that will be needed to acquire third party land for the associated infrastructure, and the funding gap for this infrastructure (which was discussed at the examination but still remains despite the updated background technical reports). Development of Bourn Airfield is not sustainable – size means that residents will still need to travel for services, increase in commuting by car despite public transport improvement (will only bring 6-7% modal shift).</li> <li>• Infrastructure needs to be in place before development takes place.</li> <li>• Delivery of new settlements must be considered unsound due to significant potential for underfunding as identified in IDS 2013. No recognised strategy for delivery of transport infrastructure on A10 corridor. Any advance of development at Waterbeach and Bourn may put at risk the delivery of Northstowe.</li> <li>• Original wording should be retained. If Bourn Airfield is to be developed then it should be lower numbers towards the end of the plan period. Should not start until 2022 if at all.</li> <li>• Deleting phasing requirement without requiring provision of infrastructure before development starts is not an effective way of delivering sustainable development. Plan should include phasing based on provision of infrastructure.</li> <li>• <b>MCA Developments</b> MoU appears to mainly exist because given its track record it is necessary for South Cambs to amalgamate future housing delivery with that of a more successful authority to avoid the need for step change delivery. Approach is predicated on South Cambs exporting its unmet housing needs into significantly more expensive HMA. The two plans do not independently provide for a rolling five year housing supply across the plan period, which does not accord with the spirit of the NPPF and was therefore rightly rejected by the appeal Inspector at Waterbeach.</li> </ul>
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	<ul style="list-style-type: none"> <li>• <b>Grosvenor &amp; USS</b> Combined trajectory does not accord with objective of a continuous high level of housing growth and it will have negative effects for the housing market. No justification for combined trajectory as the NPPF requires each authority to maintain a five year supply.</li> <li>• <b>Gladman Developments</b> Object to proposal to assess housing trajectories for both authorities together for purposes of housing delivery. Inspectors already stated a decision on a joint housing trajectory would not resolve issues regarding calculation of five year supply. The NPPF seeks to provide housing to address needs where they occur and therefore the approach proposed by the Councils is inconsistent with this advice. Any plan must be able to demonstrate a five year supply of housing land at point of adoption and on rolling basis. Each planning authority should calculate their five year supply on an individual basis. Proposed modifications should be deleted.</li> <li>• <b>Waterbeach Parish Council</b> (plus 242 returned questionnaires) Delivery of new settlements must be considered unsound due to significant potential for underfunding as identified in IDS 2013. No recognised strategy for delivery of transport infrastructure on A10 corridor. Any advance of development at Waterbeach and Bourn may put at risk the delivery of Northstowe.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p><u>Removal of restrictions on phasing of Waterbeach New Town and Bourn Airfield New Village</u></p> <p>As set out in the Council's Housing Land Supply Update 2015 (RD/MC/050, paragraphs 3.12-3.16), the submitted Local Plan allows flexibility in the delivery of all its allocations, except for the two new settlements at Waterbeach and Bourn. Promoters of both sites have indicated a strong desire to deliver their sites more quickly than would be consistent with the policies in the submitted Local Plan. The Council therefore considers it appropriate to delete the delivery limitations for the two new settlements to allow flexibility for the new settlements to come forward earlier.</p> <p>However, the revised start dates and delivery rates for the two new settlements included in the housing trajectory are not as early or as high as those indicated by the promoters. The predicted lead in times and annual completions rates are based on experience of delivering Northstowe and Cambourne, and the delivery timetables included in the housing trajectory take a sensible, cautious, and realistic approach. The housing trajectory assumes an average annual rate of 250 dwellings a year for the new settlement at Waterbeach. This is consistent with the evidence provided by a number of objectors promoting other sites in their hearing statements for Matter 8. The housing trajectory has taken account of Bourn Airfield New Village being developed alongside</p>



	<p>Cambourne West, and assumes an average annual rate of 150 dwellings a year for each of these developments, giving a combined average annual rate of 300 dwellings a year. The promoters of the two new settlements consider that they will deliver earlier and faster than assumed in the housing trajectory and the modification allows for this to take place if the market allows, providing flexibility.</p> <p><u>Delivery Rates at Major Developments</u></p> <p>The Councils carefully considered the rate of housing delivery from individual sites that should be relied upon in the joint trajectory, and took a robust and cautious approach.</p> <p>As set out in the Councils Housing Land Supply Update 2015 (RD/MC/050, paragraphs 3.14-3.15), there was consensus in the Matter 8 hearing statements that the average annual dwelling completion rate at Cambourne over the 15 years from 1999 to 2014 is 235 dwellings and that an average annual rate of completions for new settlements of 250 dwellings would be justified (with some, but not all statements, counting Cambourne West and Bourn Airfield New Village as a single new settlement). The Council has included an average completion rate for new settlements in the housing trajectory of 250 dwellings per year for Waterbeach New Town and Northstowe. This does not prevent faster delivery and provides flexibility for housing provision if this proves possible and deliverable, including associated infrastructure provision, but the Council is not relying on a faster rate of delivery as part of its housing land supply.</p> <p>It is recognised that the Infrastructure Delivery Study does not include Northstowe Phase 3, which in numbers terms is anticipated beyond the planning period. However it is acknowledged that planning for this part of the site will take place during the plan period and if delivery is accelerated it could come forward earlier. In any event it would be helpful to identify the full infrastructure requirements of the new town. The Council will work with the HCA and infrastructure providers to identify additional requirements for the remainder of Northstowe and to provide an addendum to the IDS to provide to the examination.</p> <p>Cambourne West and Bourn Airfield New Village are individual new developments being promoted by different developers and separated by the existing new village of Cambourne (a 1.5 mile separation). The Councils consider that a slightly higher combined completion rate of 300 dwellings per year (150 dwellings each) would be reasonable for these new developments given their scale and separation.</p>
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	<p><u>Review of the Local Plan</u></p> <p>The Greater Cambridge City Deal (RD/Strat/300) states that, ‘local partners are committed to an early review of their local plans beginning in 2019.’ This commitment was made after the Local Plans were submitted. The Councils would not object to a reference to this effect in the Local Plans, but it is not considered necessary in order to make the plans sound. The change suggested by Commercial Estates Group goes significantly further than this, by proposing an adoption deadline, and that it should include a further assessment of the inner Green Belt boundary. These changes are not supported. It would be premature to conclude an inner Green Belt review is required at that time, or whether an adoption deadline of 2020 was practicable or appropriate.</p> <p><u>Note:</u> Issues relating to the joint trajectory are addressed under modification PM/SC/2/B.</p> <p><u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/SC/2/H</p> <p><u>Note:</u> Issues regarding infrastructure provision are addressed under modification PM/SC/2/N.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/R to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/S</b>			
<b>Paragraph 2.60</b>			
<b>Representations Received</b>	Support: 1	Object: 11	Total: 12
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>RLW Estates</b> Supports removal of phasing restrictions at Waterbeach.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Martin Grant Homes &amp; Harcourt</b> Changes proposed do not respond to Inspectors letter, especially delivery of infrastructure and sustainability of sites. Unclear what infrastructure can actually delivered at Bourn Airfield. No clear comparison to North of Cambourne as an alternative despite its clear advantages.</li> <li>• <b>HCA</b> Needs proper scrutiny to understand impacts on Northstowe and other strategic sites. Councils confident capital funding is available through City Deal, however Inspectors need to consider implementation and delivery of</li> </ul>		

	<p>transport and other infrastructure improvements in context of competing demands were three new settlements to overlap. Will there be resources to cope with the delivery needs of all sites combined? Object to assumption that phase 3 of Northstowe will not come forward in the plan period, and therefore IDS does not include assessment of needs of this site. HCA should have been consulted re projections for build out of phase 3.</p> <ul style="list-style-type: none"> <li>• Unrestricted build at Waterbeach by 2031 is not sustainable or viable as infrastructure is not in place. The development will be overbearing on existing village.</li> <li>• <b>Pigeon Land &amp; LIH</b> Seeking to bring forward delivery of Waterbeach is not realistic given the amount of required infrastructure, the processes and timescales that will be needed to acquire third party land for the associated infrastructure, and the funding gap for this infrastructure (which was discussed at the examination but still remains despite the updated background technical reports). Development of Bourn Airfield is not sustainable – size means that residents will still need to travel for services, increase in commuting by car despite public transport improvement (will only bring 6-7% modal shift).</li> <li>• Concentrate delivery on Northstowe and edge of Cambridge as they are more sustainable and easier to deliver. Delivery of new settlements must be considered unsound due to significant potential for underfunding as identified in IDS 2013. No recognised strategy for delivery of transport infrastructure on A10 corridor. Any advance of development at Waterbeach and Bourn may put at risk the delivery of Northstowe.</li> <li>• <b>MCA Developments</b> Bringing forward phasing of Bourn Airfield will create competition with Cambourne. Market has its own level and most likely outcome will be reduction in anticipated delivery on both sites. Phasing of Bourn Airfield should be left to later in the plan period.</li> <li>• <b>Scott Properties</b> Councils current position suggests that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer). This provides a strong indication that additional housing is required.</li> <li>• <b>Waterbeach Parish Council</b> (plus 242 returned questionnaires) Delivery of new settlements must be considered unsound due to significant potential for underfunding as identified in IDS 2013. No recognised strategy for delivery of transport infrastructure on A10 corridor. Any advance of development at Waterbeach and Bourn may put at risk the delivery of Northstowe.</li> </ul>
<b>Councils'</b>	Proposed modification reflects the removal of phasing restrictions

<b>Assessment</b>	<p>regarding the new settlements proposed in modifications to Policy S/6, S/12, SS/5 and SS/6.</p> <p><u>Note:</u> Removal of phasing restrictions on Waterbeach and Bourn Airfield and delivery at major developments are addressed under modification PM/SC/2/R.</p> <p><u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/SC/2/H</p> <p><u>Note:</u> Issues regarding infrastructure provision are addressed under modification PM/SC/2/N.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/S to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/T Paragraph 2.61</b>			
<b>Representations Received</b>	Support: 1	Object: 17	Total: 18
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Countryside Properties &amp; Taylor Family</b> Support modification that ensures consistency with PM/SC/2/H.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Pigeon Land &amp; LIH</b> South Cambs and Cambridge have separate local plans and should therefore have separate housing trajectories. The fact that the City Deal has been signed does not provide justification for the joint approach to the delivery of housing. This was confirmed by the planning appeals at Waterbeach.</li> <li>• <b>Barratt Eastern Counties &amp; North West Cambridge Consortium of Landowners, Endurance Estates, Unwins &amp; Biggs, Pembroke College &amp; Balaam Family, Great Shelford Ten Acres and Bidwells</b> Further evidence relating to objectively assessed needs is flawed and therefore object to increasing housing target by 500 dwellings. Joint trajectory does not comply with NPPF which requires that, to boost significantly the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against <u>their</u> housing requirements. The two Councils are still proceeding with separate plans, with separate identified sites to meet their individual housing requirements. There has been no cross boundary sharing of housing needs. The</li> </ul>		

	<p>proposed approach has been introduced late in the plan making process to mask deficiencies in the Councils housing land supply in the early part of the plan period.</p> <ul style="list-style-type: none"> <li>• <b>MCA Developments</b> MoU appears to mainly exist because given its track record it is necessary for South Cambs to amalgamate future housing delivery with that of a more successful authority to avoid the need for step change delivery. Approach is predicated on South Cambs exporting its unmet housing needs into significantly more expensive HMA. The two plans do not independently provide for a rolling five year housing supply across the plan period, which does not accord with the spirit of the NPPF and was therefore rightly rejected by the appeal Inspector at Waterbeach.</li> <li>• <b>Commercial Estates Group</b> The Councils are committed, via the City Deal and the underlying rationale for the Joint Trajectory, to an early review of the Local Plans but this is not captured anywhere within the plans themselves.</li> <li>• <b>Scott Properties</b> Councils current position suggests that they can demonstrate a five year housing land supply under only one scenario (Liverpool with 5% buffer). This provides a strong indication that additional housing is required.</li> <li>• <b>CALA Homes, Quy Estate, Shelford Investments Ltd, North Barton Road Land Owners Group, and Ely Diocesan Board of Finance</b> Request all references to joint trajectory are deleted. NPPF makes no provision for combined housing trajectories, and the responsibility for maintaining a five year housing supply rests with individual LPAs. Even where a joint plan is prepared each authority still retains overall responsibility for maintaining its own housing land supply. No alternatives to a joint housing trajectory have been considered by the Councils. No action has been taken to boost housing delivery, and the undersupply position is worsening year on year. The South Cambs housing trajectory should be treated with caution and is highly likely to be overly optimistic because historic monitoring data demonstrates less housing is delivered than predicted. Over reliance on new settlements to maintain an adequate housing land supply is a risky strategy. Timetable for delivery needs to be reassessed in detail.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p>Proposed modification relates to changes required to reflect the Memorandum of Understanding.</p> <p><u>Note:</u> Issues relating to the principle of applying a joint trajectory are addressed under modification PM/SC/2/B.</p>

	<p><u>Note:</u> Issues regarding the objectively assessed need are addressed under modification PM/SC/2/H</p> <p><u>Note:</u> Adding reference to a Local Plan Review is addressed under the assessment of PM/SC/2/R.</p> <p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/T to the Examination Inspectors.

<b>Proposed Modification: PM/SC/2/U</b>			
<b>Paragraph 2.66</b>			
<b>Representations Received</b>	Support: 1	Object: 1	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Countryside &amp; Taylor Family</b> Support modifications that ensure consistency with modifications to Policies S/6 and S/12 as this conforms with duty to co-operate and NPPF call for flexibility.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>MCA Developments</b> Bringing forward phasing of Bourn Airfield will create competition with Cambourne. Market has its own level and most likely outcome will be reduction in anticipated delivery on both sites. Phasing of Bourn Airfield should be left to later in the plan period.</li> </ul>		
<b>Councils' Assessment</b>	<p>Proposed modification reflects the removal of phasing restrictions regarding the new settlements proposed in modifications to Policy S/6, S/12, SS/5 and SS/6.</p> <p><u>Note:</u> Removal of phasing restrictions on Waterbeach and Bourn Airfield are addressed under modification PM/SC/2/R.</p>		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/U to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/2/V</b>			
<b>Figure 3: Housing Trajectory</b>			
<b>Representations Received</b>	Support: 1	Object: 2	Total: 3
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Support proposal to rely on housing trajectory updated annually and published in AMR.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• The original timescale and number of houses for Bourn Airfield (if required) should be kept to the original timing – not to start before 2022 and only 1700 homes to be</li> </ul>		

	<p>constructed.</p> <ul style="list-style-type: none"> <li>Housing trajectory should be retained as good overview of the timescales envisaged by the Council. Updated trajectories based on actual rates of delivery are useful means of monitoring changes and should be published in AMRs.</li> </ul>
<b>Councils' Assessment</b>	The housing trajectory in the submitted Local Plan is out of date and rather than replace it and it become out of date again, the Proposed Modification deletes the trajectory from the Local Plan. Updated housing trajectories will be published each year in each Councils' Annual Monitoring Reports.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/2/V to the Examination Inspectors.

## Chapter 3: Strategic Sites

Proposed Modification: PM/SC/3/A Policy SS/3: Cambridge East			
<b>Representations Received</b>	Support: 6	Object: 4	Total: 10
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Support from <b>CPPF; Cambridgeshire County Council; Historic England; Endurance Estates and Marshall Group Property; Anglian Water Services; and Rustat Road Neighbourhood Association.</b></li> <li>• <b>Endurance Estates and Marshall Group Property</b> have submitted new evidence on noise, air quality and how the proposed development will interact with the running of the airport.</li> <li>• The <b>County Council</b> states that the primary and secondary schools are needed on the east side of the city to meet the needs of the growing city and inclusion of their requirement within the policy is supported.</li> <li>• Some supporters of this site suggest it means that GB1 and GB2 no longer need to be removed from the Green Belt.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>CEG</b> argues that the latest transport and infrastructure studies do not support the chosen locations for housing development, including Land North of Cherry Hinton.</li> <li>• <b>CEG</b> argues that the updated transport modelling does not provide any evidence that this scheme will not directly be dependent on the Newmarket to Cambridge transport corridor.</li> <li>• <b>Teversham Parish Council</b> expresses concern about cumulative impact of this site and Wing on the area.</li> <li>• <b>Teversham Parish Council</b> states there is a need for transport improvements, including a new station, new cycleway, improved bus service and highway improvements.</li> <li>• <b>Teversham Parish Council</b> expresses concern about green separation of Teversham.</li> <li>• A qualified objection by <b>Endurance Estates and Marshall Group Property</b> to the policy wording; they argue that criteria c to e should be deleted as they imply the allocation is subject to some conditionality.</li> <li>• <b>CPRE</b> argue that the land not to be allocated in this plan is not deliverable and so should be returned to the Green Belt.</li> </ul>		
<b>Councils' Assessment</b>	This site will make a valuable contribution to housing supply in Cambridge and South Cambridgeshire. At the second stage in the development sequence, it remains a highly suitable and		



	<p>sustainable location for development on the edge of Cambridge. The site is not in the Green Belt and is allocated for development in the Cambridge East Area Action Plan 2008. The site is capable of being developed while the airport remains in operation.</p> <p>The remaining land at Cambridge East outside the allocation is proposed to be safeguarded for potential future development. While Marshall is not vacating the Airport in the foreseeable future, there remains the potential that the airport may be developable at some point. The NPPF only allows the Councils to amend the Green Belt boundary (including returning land to the Green Belt) in exceptional circumstances, and that regard must be had to the permanence of the Green Belt. The Councils conclude that it is not appropriate to return land to the Green Belt in this location. This matter was addressed at the Matter 9 hearing sessions in April 2015.</p> <p>In terms of transport, the evidence is that transport impacts can be acceptably mitigated and there will not be an unacceptable impact on Teversham or Newmarket Road (or elsewhere). The latest transport modelling for this site is contained in the modelling undertaken to support the recent consultation (reference: RD/MC/070). The updated Local Plan transport modelling shows that in the AM Peak in 2031 that journey times on Newmarket Rd decrease with the planned mitigation. The modelling included a range of highway and public transport mitigation measures considered appropriate for the nature of the development, such as a new bus service to the City Centre via Coldham's Lane.</p> <p>A detailed Transport Assessment will be submitted with any planning application.</p> <p>The Councils do not consider the suggestion to delete criteria c to e proposed by Endurance Estates and Marshall Group Property are appropriate. Criteria c, d and e are important and reasonable considerations that need to be taken into account at the development management stage and need to be met in order to demonstrate that development is acceptable. This is not considered to be an unusual policy approach, and is broadly consistent with Policy CE/35 in the Area Action Plan and the drafted policies included in the Councils' submission plans.</p> <p>The development boundary will not come into the Green Belt designated by the Cambridge East Area Action Plan in 2008, which was identified as appropriate to provide green separation with Teversham. There is potential for the school playing fields to be within the Green Belt, these are recreational uses and appropriate uses within the Green Belt, and will not impact on the green separation for the village.</p>
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	<u>Note:</u> The main issues raised regarding transport are addressed under modification PM/SC/2/N.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/3/A to the Examination Inspectors.

<b>Proposed Modification: PM/SC/3/B Paragraph 3.25</b>			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	No Comments		
<b>Councils' Assessment</b>	<u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation are addressed under modification PM/SC/3/A.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/3/B to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/3/C Paragraph 3.26</b>			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	No Comments		
<b>Councils' Assessment</b>	<u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation are addressed under modification PM/SC/3/A.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/3/C to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/3/D Paragraph 3.27</b>			
<b>Representations Received</b>	Support: 1	Object: 1	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Support from <b>Cambridgeshire County Council</b>.</li> <li>• The <b>County Council</b> state that the primary and secondary schools are needed on the east side of the city to meet the needs of the growing city and inclusion of their requirement within the policy is supported.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>CEG</b> argue that the latest transport and infrastructure studies do not support the chosen locations for housing development, including Land North of Cherry Hinton.</li> <li>• <b>CEG</b> argue that the updated transport modelling does not provide any evidence that this scheme will not directly be</li> </ul>		

	dependent on the Newmarket to Cambridge transport corridor.
<b>Councils' Assessment</b>	Support noted.  <u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/SC/3/A.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/3/D to the Examination Inspectors.

<b>Proposed Modification: PM/SC/3/E</b>			
<b>New paragraphs after paragraph 3.27</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Support from <b>Cambridgeshire County Council</b>.</li> <li>• The <b>County Council</b> states that the primary and secondary schools are needed on the east side of the city to meet the needs of the growing city and inclusion of their requirement within the policy is supported.</li> </ul>		
<b>Councils' Assessment</b>	Support noted.  <u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/SC/3/A.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/3/F</b>			
<b>Provisional Modification: Figure 6 relating to Cambridge Biomedical Campus Extension</b>			
<b>Representations Received</b>	Support: 0	Object: 3	Total: 3
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• None</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• <b>CEG</b> objects to the Council's approach to defining Green Belt boundaries which fail to provide clear and recognisable boundaries based on readily recognisable physical features which are likely to be permanent.</li> <li>• Building on land within 30 metres of a nature reserve is unsustainable.</li> <li>• <b>Pigeon Land and LIH</b> No exceptional circumstances justifying the release of this land from the Green Belt. Further investigation will be required re delivery and sustainability of the provisional allocation. The land to the south of CBC is not sufficient to meet the needs of the bio-medical and healthcare life sciences research needing to</li> </ul>		

	located in close proximity to CBC and Addenbrooke's. Proper assessment of employment land requirements of bio-medical, healthcare and life sciences required.
<b>Councils' Assessment</b>	The proposed allocation is bounded by clear physical features includes hedges and drainage ditches.  See the assessment under modification PM/SC/8/A.
<b>Approach to Proposed Modification</b>	See the proposed approach under modification PM/SC/8/A.

<b>Proposed Modification: PM/SC/3/G</b>			
<b>Figure 7: Illustration of Major Development Area and Safeguarded Land at Cambridge East</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>Support from <b>Historic England</b>.</li> </ul>		
<b>Councils' Assessment</b>	Support noted.  <u>Note:</u> The main issues raised regarding the proposed North of Cherry Hinton allocation addressed under modification PM/SC/3/A.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/3/H</b>			
<b>Policy SS/5: Waterbeach New Town</b>			
<b>Representations Received</b>	Support: 6	Object: 11	Total: 17
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li><b>Historic England</b> Support modifications proposed relating to development strategy.</li> <li><b>Urban &amp; Civic</b> Support removal of phasing restrictions for Waterbeach as provides flexibility.</li> <li><b>RLW Estates</b> Support deletion of phasing restrictions – welcome reason for change being promoters able to commence sooner and acknowledgement of cautious approach having been taken in housing trajectory. However, missed opportunity to amend Policy SS/5 regarding northern limit of development, overall dwelling capacity, references for need for AAP, and role of Neighbourhood Plan.</li> <li><b>Anglian Water</b> Support removal of restrictions to start date provided necessary infrastructure is in place to serve the development.</li> <li>It would be unrealistic and a waste of land not to put the barracks site to good use for housing, however if the quality</li> </ul>		

	<p>of life of existing and new residents is not to be compromised, it is essential that steps are taken to provide infrastructure before building starts.</p> <ul style="list-style-type: none"> <li>• <b>MCA Developments</b> Waterbeach will need a long lead in time before any significant delivery can take place. Primary competition will be Northstowe which is under construction.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Bloor Homes Eastern</b> Object to removal of phased approach to new settlements as does not address the fundamental issue that the new settlements rely on the provision of infrastructure for which there is a significant funding gap. As a consequence, there can be no certainty that the new settlements can be delivered as planned, or even at all within the plan period. Waterbeach would require up-front provision of transport infrastructure plus investment in facilities and services such as schools and healthcare. It is essential that there is certainty that this infrastructure is deliverable. New settlements will be competing for transport infrastructure enhancements at the same time. Timescales for the delivery of infrastructure on the A10 corridor does not correlate with the housing trajectory.</li> <li>• No more than 1400 dwellings should be completed by 2031 as there is not the infrastructure to cope with unlimited development.</li> <li>• Removal of restriction on level and quantum of development is not a strategic approach. It is unclear whether there is sufficient funding in place to deliver infrastructure for this development. Could lead to much higher quantum of development in the plan period.</li> <li>• <b>Waterbeach Parish Council</b> Object to building of large new settlement; however recognise development may be inevitable. If development is to take place, promoters cannot be allowed to deliver a substantial number of dwellings until necessary road improvements are made. Unacceptable to remove condition that no more than 1,400 dwellings will be completed by 2031 without replacing it with a reference to essential transport improvements.</li> <li>• <b>Pigeon Land &amp; LIH</b> Seeking to bring forward delivery of Waterbeach is not realistic given the amount of required infrastructure, the processes and timescales that will be needed to acquire third party land for the associated infrastructure, and the funding gap for this infrastructure (which was discussed at the examination but still remains despite the updated background technical reports).</li> <li>• Earlier start will not allow time for necessary infrastructure to be provided first. Infrastructure improvements already long overdue. No indication that funding is available.</li> </ul>
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	<ul style="list-style-type: none"> <li>Original wording should be retained as it appropriate provides for discretion according to need and gives an indication of the build trajectory.</li> </ul>
<b>Councils' Assessment</b>	<p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p> <p><u>Note:</u> Removal of phasing restrictions on Waterbeach and Bourn Airfield are addressed under modification PM/SC/2/R.</p> <p><u>Note:</u> Issues regarding infrastructure provision are addressed under modification PM/SC/2/N.</p> <p><u>Limit of Development, Overall Dwelling Capacity, Requirement for an AAP, and Relationship with Neighbourhood Plan</u>  Future examination hearings into Policy SS/5 are likely to consider the northern limit of development, dwelling capacity and references to the need for an Area Action Plan. The Council's preferred approach is to see this site secured through the Local Plan process and then prepare an Area Action Plan (AAP) to inform any subsequent outline application in accordance with Policy SS/5. However, it is acknowledged that the promoters are preparing a Development Framework Document to support a planning application, and engaging with the Council through this separate process and the appropriate approach can be reviewed in the site specific hearing later in the examination in light of circumstances at that time. Reference to the Parish Council's intention to prepare a Neighbourhood Plan could be inserted into the supporting text to the policy as appropriate before adoption as a minor change not concerning the soundness of the plan.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/3/H to the Examination Inspectors.

<b>Proposed Modification: PM/SC/3/I</b>			
<b>Policy SS/6: New Village at Bourn Airfield</b>			
<b>Representations Received</b>	Support: 3	Object: 16	Total: 19
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li><b>Historic England</b> Support modifications proposed relating to development strategy.</li> <li><b>Countryside Properties &amp; Taylor Family</b> Support modifications which make the plan more flexible, so site can come forward more quickly.</li> <li><b>Anglian Water</b> Support removal of restrictions to start date provided necessary infrastructure is in place to serve the development.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li><b>Cambridge PPF</b> Concerns about sustainability of Bourn</li> </ul>		

	<p>Airfield. Will be dependent on Cambridge and could just be a dormitory development. Will compete with Cambourne. Additional housing might be best re-located to Cambourne so as to build Cambourne to the level that it becomes more self-sufficient.</p> <ul style="list-style-type: none"> <li>• Proposed new infrastructure for Bourn Airfield and West Cambourne is at earliest stages of consultation. Infrastructure and housing delivery must be phased correctly, so makes no sense to bring development on these sites forward early.</li> <li>• <b>Coalition of Parish Councils and Caxton and Hardwick Parish Councils</b> Appraisal of edge of Cambridge vs new settlements is inadequate as based mainly on qualitative information and only done in general terms.</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Object to retention of requirement for an AAP to be prepared as this is not consistent with modifications to increase flexibility and enabling site to start early. Object to retention of designation of major development area which will artificially constrain layout. Instead policy should refer to preparation of a DFD to guide development and for this to be submitted as part of first planning application.</li> <li>• Additional evidence and subsequent modifications fail to address the Inspectors concerns over the Local Plans departure from the sustainable development strategy review and in particular its over reliance on new settlements.</li> <li>• <b>Pigeon Land &amp; LIH</b> Development of Bourn Airfield is not sustainable – size means that residents will still need to travel for services, increase in commuting by car despite public transport improvement (will only bring 6-7% modal shift).</li> <li>• Keep existing timescales, there is no reason or logic for this change.</li> <li>• If Cambourne West is to be built, there is no need for Bourn Airfield. If Bourn Airfield is to proceed, should not start earlier as with Cambourne West, this would cause significant traffic and environmental issues for local residents. Should remain as submitted Local Plan - 1700 homes and start in 2022.</li> <li>• Original wording should be retained as it appropriate provides for discretion according to need and gives an indication of the build trajectory.</li> <li>• Bourn Airfield and other sites have been considered as liable to flooding, and therefore are not suitable for development. Delete allocation.</li> <li>• <b>MCA Developments</b> Bringing forward phasing of Bourn Airfield will create competition with Cambourne. Market has</li> </ul>
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	<p>its own level and most likely outcome will be reduction in anticipated delivery on both sites. Phasing of Bourn Airfield should be left to later in the plan period.</p> <ul style="list-style-type: none"> <li>• <b>North Barton Road Land Owners Group</b> Bourn Airfield should be deleted. The timetable for delivery is uncertain and unclear level of affordable housing that could be provided despite being key part of development strategy.</li> </ul>
<b>Councils' Assessment</b>	<p><u>Note:</u> Issues regarding the development strategy are addressed under modification PM/SC/2/N.</p> <p><u>Note:</u> Removal of phasing restrictions on Waterbeach and Bourn Airfield are addressed under modification PM/SC/2/R.</p> <p><u>Note:</u> Issues regarding infrastructure provision are addressed under modification PM/SC/2/N.</p> <p><u>Requirement to Prepare Area Action Plans</u>  The Council's preferred approach is to see this site secured through the Local Plan process and then prepare an Area Action Plan (AAP) to inform any subsequent outline application in accordance with Policy SS/6. However, it is acknowledged that the promoters are preparing a Development Framework Document to support a planning application, and engaging with the Council through this separate process and the appropriate approach can be reviewed in the site specific hearing later in the examination in light of circumstances at that time.</p> <p><u>Note:</u> Issues regarding Cambourne West Planning application are addressed under modification PM/SC/2/N.</p>
<b>Approach to Proposed Modification</b>	<p>No Change. Submit proposed modification PM/SC/3/I to the Examination Inspectors.</p>



## Chapter 4: Climate Change

<b>Proposed Modification: PM/SC/4/A</b> <b>Paragraph 4.12</b>			
<b>Representations Received</b>	Support: 1	Object: 1	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Bloor Homes</b> Recognises the withdrawal of the Code for Sustainable Homes and that these issues should be dealt with via Building Regulations. Approach to applying nationally defined optional water efficiency standards is accepted.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>South Cambridgeshire Green Party</b> Urge the Council to require energy efficiency standards above and beyond national minimum, aiming for zero carbon dwellings, and require most stringent standards of water efficiency.</li> </ul>		
<b>Councils' Assessment</b>	<p>The Government set out in 'Fixing the foundations – creating a more prosperous nation' (July 2015) that it does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme or the proposed 2016 increase in on-site energy efficiency standards. To ensure consistency with national policy the proposed modification reflects this latest statement.</p> <p>The Government set out in its Written Ministerial Statement – 25 March 2015 that local planning authorities should not set any local technical standards or requirements relating to the construction or performance of new dwellings and that the optional national technical standard on water should only be required through new Local Plan policies if they address a clearly evidenced need and where the impact on viability has been considered. To ensure consistency with national policy, the Council intend to rely on Building Regulations to set the energy efficiency requirements of new dwellings and to require compliance with the new national technical standard on water as proposed through PM/SC/4/E and PM/SC/4/F.</p>		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/A to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/4/B</b> <b>Policy CC/2: Renewable and low carbon energy generation</b>			
<b>Representations Received</b>	Support: 1	Object: 2	Total: 3
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Historic England</b> Have no objections to the proposed modifications.</li> </ul> <p><b>Object</b></p>		

	<ul style="list-style-type: none"> <li>• <b>Gamlingay Community Turbine Group</b> Fully support the modifications proposed Requirement that permission for wind turbines to only be granted if an area is identified in a local or neighbourhood plan needs to be elaborated as if applied literally the modification would have prevented the construction of the highly successful and beneficial Gamlingay community turbine (amended wording proposed). Not practical for the whole of South Cambridgeshire to be analysed in detail.</li> <li>• <b>South Cambridgeshire Green Party</b> Urge the Council to do all they can to approve applications for wind turbines within the constraints of national policy.</li> </ul>
<b>Councils' Assessment</b>	<p>The Government set out in its Written Ministerial Statement – 18 June 2015 that local planning authorities should only grant planning permission for one or more wind turbines if the development site is identified as suitable for wind energy development in a Local or Neighbourhood Plan. To ensure consistency with national policy, the proposed modification makes it clear that the Council's criteria based policy for renewable energy cannot be applied to wind energy developments as suitable areas for wind energy developments have not been identified in the Local Plan.</p> <p>See also Proposed Modification PM/SC/4/D, which adds the criteria for considering wind turbines, as set out in the Written Ministerial Statement – 18 June 2015, to Policy CC/2 to ensure consistency with national policy. Suitable areas for wind energy developments can be identified through Neighbourhood Plans, and therefore community wind turbines could still be delivered during the plan period if a local community identifies a suitable site through a Neighbourhood Plan.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/B to the Examination Inspectors.

<b>Proposed Modification: PM/SC/4/C</b>			
<b>Policy CC/2: Renewable and low carbon energy generation</b>			
<b>Representations Received</b>	Support: 4	Object: 22	Total: 26
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• <b>Natural England</b> Support proposed amendment to ensure that proposed development does not have an unacceptable impact on high quality agricultural land.</li> <li>• <b>Historic England</b> No objections to the proposed modifications.</li> <li>• Good agricultural land must be used for food production only; brownfield sites and poor agricultural land are suitable places for solar PV.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Agricultural land is a critically important ingredient of the countryside.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Flecks Lane Action Group</b> Proposed modifications in relation to solar farms do not provide enough protection for high quality agricultural land and do not reflect national planning principles of local communities being able to influence decisions (WMS 25 March). Policy should be amended to require proposals on best and most versatile agricultural land to be justified by compelling evidence and require proposals to demonstrate local community support (new wording proposed for a and d).</li> <li>• Proviso that good agricultural land should not be developed is appropriate; however the new town at Waterbeach includes areas of good agricultural land in conflict with this policy.</li> <li>• <b>South Cambridgeshire Green Party</b> Urge the Council to do all they can to approve applications for wind turbines within the constraints of national policy.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p>The Government set out in its Written Ministerial Statement – 25 March 2015 that the NPPF is quite clear that local councils should take into account the economic and other benefits of the best and most versatile agricultural land when considering development proposals, but that some local communities have genuine concerns that insufficient weight has been given to these protections and the benefits of high quality agricultural land when considering solar farms. The Written Ministerial Statement therefore makes it clear that the Government expect that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence; however it also states that every application needs to be considered on its individual merits, in light of the relevant material considerations.</p> <p>The Councils submitted Local Plan includes Policy NH/3: Protecting Agricultural Land, however to ensure consistency with national policy, the proposed modification adds an additional criteria to Policy CC/2 so that the policy states that planning permission for proposals to generate energy from renewable and low carbon sources will only be permitted provided that the development, either individually or cumulatively, does not have an unacceptable adverse impact on high quality agricultural land. As part of the supporting documentation submitted with any planning application, the Council would expect the developer to demonstrate that a proposal on high quality agricultural land will not have an unacceptable adverse impact, and therefore it is not necessary for the policy to state “justified by the most compelling evidence” as requested by respondents objecting to the proposed</p>

	<p>modification.</p> <p>Respondents objecting to the modification also request that criteria 1d should be amended to include a requirement to “demonstrate local community support for the proposed development” to be consistent with the guiding principles included in the Governments UK Solar PV Strategy (Part 1 - October 2013 and Part 2 - April 2014) which states that “support for solar PV should ensure proposals are appropriately sited, give proper weight to environmental considerations ..., and provide opportunities for local communities to influence decisions that affect them”.</p> <p>The submitted Policy CC/2 1d states that planning permission for proposals to generate energy from renewable and low carbon sources will only be permitted provided that developers have engaged effectively with the local community and local authority. It is not appropriate to require developers to demonstrate local community support for the proposed development. As part of the supporting documentation submitted with any planning application, the Council would expect the developer to demonstrate how their proposal has met the criteria outlined in the policy, including how they have engaged with the community and the local authority prior to the submission of the planning application.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/C to the Examination Inspectors.

<b>Proposed Modification: PM/SC/4/D</b>			
<b>Policy CC/2: Renewable and low carbon energy generation</b>			
<b>Representations Received</b>	Support: 1	Object: 4	Total: 5
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Historic England</b> No objections to the proposed modifications.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>RES Group</b> Deferral of allocating areas to neighbourhood plans is effectively a moratorium against all wind energy development. This is not a proactive or positive strategy to promote energy generation from renewable sources. Neighbourhood Plans are usually focussed on towns and villages and therefore are unlikely to encompass suitable land for onshore wind, and there is no statutory requirement to produce a plan. As shown by Rotherham Borough Council, it would be quick to produce a map of areas suitable for onshore wind (based on landscape designations and wind speed). RES Group have produced a map showing broad areas with potential for wind energy developments.</li> </ul>		

	<ul style="list-style-type: none"> <li>• <b>Gamlingay Community Turbine Group</b> Interpretation of modification would prevent wind turbine developments as Neighbourhood Plans do not exist or do not have resources required for a thorough analysis of suitability for wind turbines.</li> <li>• Will limit the communities able to deliver wind energy schemes to those that have undertaken Neighbourhood Plans (likely to only be larger villages that have resources). Modification precludes similar, highly beneficial projects to the Gamlingay Community Wind Turbine being delivered for the foreseeable future and goes against the very essence of Localism in allowing communities to be in control of their own destinies.</li> <li>• <b>South Cambridgeshire Green Party</b> Urge the Council to do all they can to approve applications for wind turbines within the constraints of national policy.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p>The Government set out in its Written Ministerial Statement – 18 June 2015 that local planning authorities should only grant planning permission for one or more wind turbines if the development site is identified as suitable for wind energy development in a Local or Neighbourhood Plan.</p> <p>To ensure consistency with national policy, Policy CC/2 has been amended to replace the requirement for a minimum separation distance between a dwelling and a wind turbine (included as there was support from Members, Parish Councils and local residents for this criteria) with the guidance set out in the Written Ministerial Statement. As the Council has not identified areas suitable for wind energy development in the Local Plan, the proposed modification makes it clear that wind energy developments will only be permitted where suitable areas have been identified in any Neighbourhood Plans.</p> <p>Given the nature of the landscape and townscape of the district it is not appropriate to identify broad locations for wind energy developments in the Local Plan. The Proposed Modification provides the opportunity for local communities to identify suitable areas for wind energy developments through a Neighbourhood Plan, and therefore community wind turbines could still be delivered during the plan period if a local community identifies a suitable site through a Neighbourhood Plan.</p> <p>The broad areas map submitted by RES identifies potential onshore wind areas; however this map should be treated with caution as the assessment has not taken into account the impact of wind turbines in these locations on heritage and natural assets, the townscape and landscape, or nearby residents and other uses (e.g. Cambridge Airport). A more detailed assessment taking</p>

	account of constraints and designations would need to be undertaken before any suitable areas for wind energy developments could be identified. As the change in national policy came over a year after the submission of the Local Plan, it is considered that this is a matter for the review of the Local Plan and should not delay to adoption of the submitted Local Plan.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/D to the Examination Inspectors.

<b>Proposed Modification: PM/SC/4/E</b>			
<b>Policy CC/4: Sustainable Design and Construction</b>			
<b>Representations Received</b>	Support: 2	Object: 3	Total: 5
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Historic England</b> No objections to the proposed modifications.</li> <li>• <b>Bloor Homes</b> Use of nationally defined optional standard relating to water efficiency is accepted.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Countryside Properties &amp; Taylor Family</b> Broadly support proposed amendments but can prove difficult to achieve for certain dwellings so a degree of flexibility should be written into the policy to allow for a holistic approach to internal and external water standards (new wording proposed).</li> <li>• Modifications do not take account of the water availability and the level of water stress in the area. There is a good chance that Cambridge Water do not have sufficient water in the chalk aquifer to safely and sustainably maintain the proposed growth of Cambridge and its environs. Government is not helping by lowering standards and making water efficiency less important.</li> <li>• <b>South Cambridgeshire Green Party</b> Urge the Council to require most stringent standards of water efficiency.</li> </ul>		
<b>Councils' Assessment</b>	<p>The Government set out in its Written Ministerial Statement – 25 March 2015 that local planning authorities should not set any local technical standards or requirements relating to the construction or performance of new dwellings and that the optional national technical standard on water should only be required through new Local Plan policies if they address a clearly evidenced need and where the impact on viability has been considered. To ensure consistency with national policy and to take account of the withdrawal of the Code for Sustainable Homes (CfSH), the Council has amended Policy CC/4 to remove references to the CfSH and to require compliance with the new national technical standard on water.</p> <p>Respondents objecting to the proposed modification have</p>		

	requested additional wording is added to state that “should this target be unviable then the Council will consider alternative proposals to improve water efficiency within dwellings”. The costs of achieving higher water efficiency standards were explored in the Cambridge Area Water Cycle Strategy 2011, and the reduction in water consumption necessary to achieve the optional technical standard rather than the national standard can be achieved at a low additional cost by using alternative fixtures and fittings which use less water. It is considered necessary and justified to require the optional technical standard for water given the district is in an areas of water stress as designated by the Environment Agency.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/E to the Examination Inspectors.

<b>Proposed Modification: PM/SC/4/F Paragraph 4.19</b>			
<b>Representations Received</b>	Support: 2	Object: 1	Total: 3
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Bloor Homes Eastern</b> Use of nationally defined optional standard relating to water efficiency is accepted.</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Supports the Council’s proposals to use Building Regulations as the only mechanism to set energy efficiency standards in new homes.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>South Cambridgeshire Green Party</b> Urge the Council to require most stringent standards of water efficiency.</li> </ul>		
<b>Councils’ Assessment</b>	<p>The Government set out in its Written Ministerial Statement – 25 March 2015 that local planning authorities should not set any local technical standards or requirements relating to the construction or performance of new dwellings and that the optional national technical standard on water should only be required through new Local Plan policies if they address a clearly evidenced need and where the impact on viability has been considered. To ensure consistency with national policy and to take account of the withdrawal of the Code for Sustainable Homes (CfSH), the Council has amended Policy CC/4 to remove references to the CfSH and to require compliance with the new national technical standard on water. It is considered necessary and justified to require the optional technical standard for water given the district is in an areas of water stress as designated by the Environment Agency.</p>		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/F to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/4/G</b>			
<b>Policy CC/8: Sustainable Drainage Systems</b>			
<b>Representations Received</b>	Support: 2	Object: 0	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Hallmark Hotels</b> Welcome the aligning of local and national policy.</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Acknowledge the change in policy and can confirm that Bourn Airfield SuDS scheme will be developed in line with this modified policy. The final Cambridgeshire Flood and Water SPD will need to be reviewed when available to confirm any key issues.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/G to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/4/H</b>			
<b>Paragraph 4.32</b>			
<b>Representations Received</b>	Support: 2	Object: 0	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Natural England</b> Amendments to ensure sustainable drainage systems take account of wildlife assets are supported.</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Acknowledge and agree that SuDS should be provided in new development when considered necessary. SuDS will be extensively used at Bourn Airfield. The preparation of the surface water strategy for Bourn Airfield has been undertaken in parallel with the masterplanning process.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/H to the Examination Inspectors.		



<b>Proposed Modification: PM/SC/4/I Paragraph 4.33</b>			
<b>Representations Received</b>	Support: 2	Object: 0	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Natural England</b> Amendments to ensure that SuDS contribute to biodiversity enhancements are supported.</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Confirm that the Cambridgeshire Flood and Water SPD and the CIRIA SuDS Manual will be used in order to develop an effective SuDS Strategy for Bourn Airfield.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/4/I to the Examination Inspectors.		

## Chapter 7: Delivering High Quality New Homes

Proposed Modification: PM/SC/7/A Policy H/1: Allocations for Residential Development at Villages - Great & Little Abington			
<b>Representations Received</b>	Support: 23	Object: 12	Total: 35
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Little Abington Parish Council</b> Supports proposed allocation H/1:k, land at Bancroft Farm. Parish Council led scheme. New landscape buffer to rear will be of benefit. Proposals which do not support local aspirations unlikely to be supported.</li> <li>• Proposals will help meet local housing needs including for families, downsizing and affordable housing.</li> <li>• Site area of H/1:k Bancroft Farm should not be extended and should be limited to 6 dwellings.</li> <li>• Proposals have local support (75% of respondents to a local consultation) and were drawn up after extensive discussion.</li> <li>• <b>Anglian Water</b> Some water infrastructure upgrades may be needed.</li> <li>• <b>Committee for Abington Housing</b> Supports all three sites. The sites were chosen by the local community and 75% of respondents have supported them when consulted locally. A local housing survey has identified a need for affordable homes and homes for downsizers.</li> <li>• Support development of all three sites. They have local support and will provide affordable homes and homes for downsizers.</li> <li>• Pampisford Road needs a cycle path a pavement and a lane for horse riders.</li> <li>• Support H/1:k subject to concerns re PVAA land and no encroachment towards Bourn Bridge Road.</li> <li>• Support H/1:i provided the allotments are retained and a community orchard is provided.</li> <li>• Support H/1:k for 6 homes, with flint wall retained and retention of trees (65168). Bungalows opposite bungalows, houses opposite houses.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Do not object in principle, but other Group and Infill villages could also benefit from development, such as Caldecote.</li> <li>• Swavesey is a sustainable location for similar development.</li> <li>• All villages should be allowed to grow. Include a criteria based policy to control such growth.</li> <li>• Must not lead to A1307 road schemes but should link to investment in sustainable transport. Concerns expressed about inclusion of Parish Council led proposals.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Land at Bourn Road, Little Abington should also be allocated for residential development.</li> <li>• Development of site H/1:k should be limited to 3 dwellings with no encroachment on the meadow. Would impact on landscape character, impact on biodiversity, contrary to Parish Plan. Would encroach on meadow, provide no affordable homes and only provide 1 bungalow for downsizers.</li> <li>• Object to H/1:k land at Bancroft Farm.</li> <li>• The H/1:k Bancroft Farm site should allow for 9 homes to better utilise the site and to overcome design challenges. Site should extend slightly to the rear. Its density would better reflect existing village densities.</li> <li>• The H/1:i site on Linton Road should allow for 45 dwellings to use the site efficiently and to better reflect existing village densities.</li> </ul>
<p><b>Councils' Assessment</b></p>	<p>Local Plan policies towards village development and village omission sites are matters for future Local Plan examination hearings.</p> <p>The scale of the proposed developments in Great and Little Abington are such that they will not lead to new road schemes for the A1307. It is right that the Local Plan should seek to facilitate locally led development proposals under the spirit of localism.</p> <p>The Bourn Road site has not been proposed by the Parish Council and is not locally led, there is no evidence of local support for its allocation. It cannot be supported as a Parish Council led allocation for residential development. Similar comments apply to sites in other villages which are advanced by objectors.</p> <p>Policy H/1 states that the number of homes granted planning permission on a site may be higher or lower than the indicative capacity and that this will be determined through a design-led approach. There is no need to amend the indicative dwelling capacities shown.</p> <p>Site H/1:k has been subject to a SHLAA assessment and no significant impacts on landscape and biodiversity were found, the proposal is supported by the Parish Council and local residents.</p> <p>A number of representations refer to development proposals being brought forward by developers and not to the proposed Local Plan policy.</p> <p>Extending site H/1:k Bancroft Farm would encroach onto land proposed for protection as Local Green Space, and which is currently a Protected Village Amenity Area. The design issues</p>

	raised to justify a deeper site are that this would enable a building line equivalent to that on the other side of the street. However the site falls within a Conservation Area and should take its design context from the wider Conservation Area which also includes terraced buildings fronting the pavement or with shallow front gardens. Given that a design solution for 6 appropriately sized dwellings would not necessitate a loss of the Local Green Space the proposed change to the policy is not supported.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/7/A to the Examination Inspectors.

<b>Proposed Modification: PM/SC/7/B</b>			
<b>Policy H/1: Allocations for Residential Development at Villages - Graveley</b>			
<b>Representations Received</b>	Support: 3	Object: 3	Total: 6
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>Landowner supports the allocation which is consistent with the NPPF. It reuses brownfield land, the extra homes will support existing village facilities, will enhance landscape, no additional vehicular movements, will help to meet the district's housing need.</li> <li><b>Anglian Water</b> Some water infrastructure upgrades may be needed.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>Do not object in principle, but other Group and Infill villages could also benefit from development. Swavesey is a sustainable location for similar development. All villages should be allowed to grow, include a criteria based policy to control such growth.</li> </ul>		
<b>Councils' Assessment</b>	There are no objections to the proposed allocation of this site. The Local Plan policies towards village development will be subject to future Local Plan hearings.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/7/B to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/7/C</b>			
<b>Policy H/4: Fen Drayton Former Land Settlement Association Estate</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li><b>Historic England</b> Have no objections to the proposed modifications.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>Not applicable</li> </ul>		
<b>Councils' Assessment</b>	The proposed modification ensures consistency with national policy by taking account of the withdrawal of the Code for		

	<p>Sustainable Homes (CfSH) and removing references to the CfSH. It amends the policy so that it will still ensure the delivery of the same outcomes.</p> <p>Continuing to seek 'groundbreaking and experimental forms of sustainable living' in this location is consistent with national policy. Whilst the policy can no longer specifically require that new dwellings in this location applied for under this policy must achieve Code for Sustainable Homes Level 6, any new dwelling should still be required to be carbon neutral and 'experimental and groundbreaking'.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/7/C to the Examination Inspectors.

<b>Proposed Modification: PM/SC/7/D</b>			
<b>Paragraph 7.17</b>			
<b>Representations Received</b>	Support: 1	Object: 0	Total: 1
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Countryside Properties &amp; Taylor Family</b> Support the modification to remove reference to the Code for Sustainable Homes.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	Support noted.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/7/D to the Examination Inspectors.		

<b>Proposed Modification: PM/SC/7/E</b>			
<b>Paragraph 7.18</b>			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	The proposed modification ensures consistency with national policy by taking account of the withdrawal of the Code for Sustainable Homes (CfSH) and removing references to the CfSH. It amends the paragraph so that it will still ensure the delivery of the same outcomes.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/7/E to the Examination Inspectors.		

Proposed Modification: PM/SC/7/F			
Policy H/8: Housing Mix			
<b>Representations Received</b>	Support: 2	Object: 5	Total: 7
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Historic England</b> Have no objections to the proposed modification</li> <li>• <b>Bloor Homes Eastern</b> Support policy that promotes the delivery of Starter Homes</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• In light of the Governments Rural Productivity Plan, support the proposed modifications to H/8 but the wording of policies S/7 and S/11 represent an inflexible approach to rural housing and is not reflective of the approach in emerging Government Guidance</li> <li>• <b>Home Builders Federation</b> Policy H/11 differs from the Nationally Described Space Standards – Council needs to clarify intentions</li> <li>• <b>Home Builders Federation</b> There has been no assessment of need so the case for adopting the Nationally Described Space Standards has not been made</li> <li>• <b>Home Builders Federation</b> Unclear how the provision would affect Starter Homes</li> <li>• <b>Home Builders Federation</b> Assessment of impact on affordability has not been made</li> <li>• <b>Home Builders Federation</b> External residential space standards are not covered by the WMS, but approach is unsound given the development pressures in Cambridge</li> <li>• <b>Home Builders Federation</b> Unclear what the Council is stipulating in terms of optional technical standards for accessibility. The costs for M4(2) and M4(3) are treated as a ‘potential variable cost’ – unclear what this means</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> Market conditions and the demand for and supply of different sized homes will change during the plan period. Paragraph 1 should be amended to reflect this and to provide developers with flexibility dependent upon need at the time of an application</li> <li>• <b>Countryside Properties &amp; Taylor Family</b> The change to include Starter Homes and for people to build their own homes needs to be taken into consideration in assessing the viability of a strategic scheme. The same need for flexibility should be applied</li> <li>• <b>Urban &amp; Civic</b> Supportive of delivery of a wide choice, type and mix of housing. There has been a demonstrable increase in the need for private sector rented housing and this should be reflected in the policy (wording suggested)</li> <li>• <b>Cambridge University Health Partners</b> Support the</li> </ul>		

	<p>modification but wish emphasis to be on the need for other kinds of housing products including priority lettings and restricted occupancy schemes for lower paid and vital CBC staff</p>
<b>Councils' Assessment</b>	<p>The proposed modification does not relate to policies S/7 (Development Frameworks) and S11 (Infill villages). These policies will be considered later in the examination process.</p> <p>Many of the representations concern the nationally described residential space standards (policy H/11) and access standards (policy H/8). No modifications had been proposed in relation to the wording of the submitted South Cambridgeshire Local Plan in relation to these matters. It is the intention of the Councils to commission further evidence to support the examination of these matters at future Local Plan hearings (regarding access standards for both Councils, regarding residential space standards for South Cambridgeshire only). Any resulting plan modifications would be subject to a future round of public consultation before they could be included in the Local Plans.</p> <p>Local Plans have to be kept up to date and reflect changing policy and market conditions, the Local Plans will not remain in place unchanged until 2031 and the Councils are already committed as part of the City Deal to start work on a joint Local Plan in 2019. The policy already includes flexibility – applying only to developments of 10 or more, and including a flexibility allowance. Regard would also be had to any material considerations which might support alternative proportions of differently sized homes.</p> <p>The provision of starter homes will require less subsidy than other types of affordable housing and the proportion to be provided on site is likely to be set out by Government regulation for sites of different sizes. The requirement to provide plots for self and custom builders does not require a subsidy to be provided by the developer.</p> <p>Paragraph 7.24 already provides encouragement for the provision of private rented homes to let. There is no specific national policy guidance regarding this sector.</p> <p>Strategic housing developments in the southern part of Cambridge already make provision for 40% affordable housing and are well placed in regard to CBC. Much of this housing remains to be built.</p>
<b>Approach to Proposed Modification</b>	<p>No Change. Submit proposed modification PM/SC/7/F to the Examination Inspectors.</p>

Proposed Modification: PM/SC/7/G			
Policy H/8: Housing Mix			
<b>Representations Received</b>	Support: 5	Object: 8	Total: 13
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Hallmark Hotels</b> Support policy that promotes the delivery of Starter Homes</li> <li>• <b>Bloor Homes</b> Reflects Government's expectation that demand for self-build and custom-build is addressed. Custom-build option provides additional flexibility for developers and owners and should be encouraged. In contrast, self-build involves greater risk for owner as they take on all aspects of project and its co-ordination. In a broader sense this could result in delays to supply of housing from self build sites as individual development projects run risk of delay and slippage</li> <li>• <b>Historic England</b> No objections to the proposed modifications</li> <li>• <b>South Cambridgeshire Green Party</b> We welcome the measures proposed to help those wishing to build their own homes. We believe that self-builds can play an important role in supplying sufficient affordable and sustainable housing. Two of our members report that in the past they found it unaffordable to build a small eco-house because of the levy that was in place at the time. We therefore welcome the measures proposed to help those wishing to build their own homes</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Laragh Homes</b> The inclusion of a requirement for 20 or more dwellings to be self/custom build appears to be an arbitrary figure that lacks an evidence base</li> <li>• <b>Laragh Homes</b> Policy is vague, does not specify what percentage of plots should be reserved for self builders nor does it provide any design guidance to ensure such plots do not appear incongruous in the wider setting of a development</li> <li>• <b>Gladman Developments</b> The policy is unclear and open to interpretation as it does not set out a numerical requirement for custom and self build plots on any site. This does not assist with the future application of the policy or the consideration of financial viability</li> <li>• <b>Hallmark Hotels</b> The modification in part c is excessive and should instead be considered on a site by site basis. The excessive nature of this policy could lead to sites becoming unviable. Marketing for 12 months could become a barrier to development</li> <li>• In light of the Government's Rural Productivity Plan, support the proposed modifications to H/8 but the wording</li> </ul>		



	<p>of policies S/7 and S/11 represent an inflexible approach to rural housing and is not reflective of the approach in emerging Government Guidance</p> <ul style="list-style-type: none"> <li>• <b>Countryside Properties &amp; Taylor Family</b> Object to the proposal that on all sites of 20 or more dwellings and in each phase of strategic sites, developers will supply dwelling plots for sale to self and custom builders. Need flexibility to respond on a site by site basis in line with current housing needs and requirements. Not always be practical on a strategic site to have self build in each phase of development. A more flexible approach is required. On such sites it may be that larger clusters of plots for self build are preferable to ensure compatibility with the wider proposals. A Development Framework Document for a large strategic site will be best placed to determine the scale, location and timing of such self build proposals</li> <li>• <b>Cambridge University Health Partners</b> Support the modification but wish emphasis to be on the need for other kinds of housing products including priority lettings and restricted occupancy schemes for lower paid and vital CBC staff</li> <li>• <b>DH Barford &amp; Co Limited</b> The Council's proposed strategy will not realise the Government's stated aim to improve significantly the new self-build opportunities. Achieving the successful delivery will therefore be dependent on a more proactive approach and this should include accepting self-build developments on exception sites (wording proposed)</li> <li>• <b>Brookgate CB4 Ltd</b> The proposed requirement for all sites of 20 or more dwellings to include plots for self and custom builders is not supported. The proposed requirement is onerous, unjustified and is not sufficiently flexible to allow for individual site circumstances. Such a requirement would not be appropriate in the context of a high density mixed use scheme such as that proposed at Chesterton Sidings</li> </ul>
<p><b>Councils' Assessment</b></p>	<p>A threshold of 20 dwellings has been used in the recently adopted Teignbridge Local Plan, this threshold is considered to be appropriate locally as it will exclude the majority of small sites from the requirement.</p> <p>The policy does not specify a fixed percentage of plots for self and custom build to provide flexibility to negotiate changing levels of provision in response to evidence from the local right to build register. The design of such homes would be subject to Local Plan design policies and guidance.</p> <p>Where a developer has viability concerns these will be considered on their merits when planning applications are being determined. The policy does not require the provision of free plots of land and if</p>

	<p>any plots remain unsold after a year they can then either remain on the market or be developed by the housebuilder.</p> <p>A marketing period of 12 months is considered to be reasonable and has been used locally in relation to a number of policies in adopted plans. Self build elements may prove to be faster to develop than the main portion of development sites.</p> <p>The proposed modification does not relate to policies S/7 (Development Frameworks) and S/11 (Infill villages). These policies will be considered later in the examination process.</p> <p>There is no reason why an agreed Development Framework Document for a strategic site could not agree a bespoke approach to the provision of custom and self build housing.</p> <p>Strategic housing developments in the southern part of Cambridge already make provision for 40% affordable housing and are well placed in regard to CBC. Much of this housing remains to be built.</p> <p>Policy H/10 concerning rural exception sites already allows for market housing to be provided to help subsidise the rural exception site affordable homes.</p> <p>Agree that self and custom build provision is not likely to be practical in the context of high density, multi-storey developments providing flats rather than houses, further policy modification proposed.</p>
<p><b>Approach to Proposed Modification</b></p>	<p>Submit proposed modification PM/SC/7/G to the Examination Inspectors with the following further change:</p> <p>Correct the mistyped criteria lettering (a), (b) and (c) to (e), (f) and (g). Add at end of (g) in PM/SC/7/G:  <u><b>Exceptionally, no provision will be expected in developments or phases of developments which comprise high density multi-storey flats and apartments.</b></u></p>

<b>Proposed Modification: PM/SC/7/H Paragraph 7.24</b>			
<p><b>Representations Received</b></p>	<p>Support: 1</p>	<p>Object: 3</p>	<p>Total: 4</p>
<p><b>Main Issues</b></p>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>South Cambridgeshire Green Party</b> Self-builds play an important role in the supply of sufficient affordable and sustainable housing</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• In light of the Government's Rural Productivity Plan, support the proposed modifications to H/8 but the wording</li> </ul>		

	<p>of policies S/7 and S/11 represent an inflexible approach to rural housing and is not reflective of the approach in emerging Government Guidance</p> <ul style="list-style-type: none"> <li>• <b>DH Barford &amp; Co Limited</b> The Council's proposed strategy will not realise the Government's stated aim to improve significantly the new self-build opportunities. Achieving the successful delivery will therefore be dependent on a more proactive approach and this should include accepting self-build developments on exception sites (wording proposed)</li> <li>• Policy H/10 also requires amendments to ensure that sites are able to come forward under the exceptions policy for starter and for self-build homes, as these forms of housing are now encouraged by the Government and are considered 'affordable homes'. The Council's modifications only partially address the ministerial statement by Brandon Lewis in March 2015 which is cited as one the reasons for the modification. This statement also state that the Government will see: "the introduction of a new national exception site planning policy to enable starter homes to be built on under-used or unviable commercial or industrial sites not currently identified for housing, on both public and private land". This sentiment is also echoed in the Government's consultation document on proposed changes to the NPPF which states (at Paragraph 46) "Starter homes can provide a valuable source of housing for rural areas and, if classified as affordable housing, then we consider it should be possible to deliver starter homes through the existing rural exception site policy" . This needs to be reflected within policy H/10 and throughout the relevant chapter of the Local Plan</li> </ul>
<b>Councils' Assessment</b>	<p>The proposed modification does not relate to policies S/7 (Development Frameworks) and S11 (Infill villages). These policies will be considered later in the examination process. Emerging changes in the Housing and Planning Bill will be considered as appropriate at that time.</p> <p>The proposed modification does not relate to Policy H/10 which policy will be considered later in the examination process. Policy H/10 concerning rural exception sites already allows for market housing to be provided to help subsidise the rural exception site affordable homes. Further changes to policy H/10 may be necessary depending on the final outcome of the Governments proposed changes to the NPPF, the Housing and Planning Bill and attendant regulations and consequential changes to national planning policy guidance.</p>
<b>Approach to Proposed Modification</b>	<p>No Change. Submit proposed modification PM/SC/7/H to the Examination Inspectors.</p>

<b>Proposed Modification: PM/SC/7/I</b>			
<b>New paragraph after 7.27</b>			
<b>Representations Received</b>	Support: 2	Object: 4	Total: 6
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>South Cambridgeshire Green Party</b> Self-builds play an important role in the supply of sufficient affordable and sustainable housing</li> <li>• <b>CPRE</b> Supports the policy on self-build and starter homes, provided that this policy is not used to reduce the amount of affordable housing</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>Laragh Homes</b> There is no evidence of actual take up of the 229 people registered on the South Cambridgeshire Right to Build website</li> <li>• In light of the Governments Rural Productivity Plan, support the proposed modifications to H/8 but the wording of policies S/7 and S/11 represent an inflexible approach to rural housing and is not reflective of the approach in emerging Government Guidance</li> <li>• <b>DH Barford &amp; Co Limited</b> The Council's proposed strategy will not realise the Government's stated aim to improve significantly the new self-build opportunities. Achieving the successful delivery will therefore be dependent on a more proactive approach and this should include accepting self-build developments on exception sites (wording proposed)</li> <li>• The change is unnecessary, unjustified, and would damage wildlife</li> </ul>		
<b>Councils' Assessment</b>	<p>Take up of plots for self and custom build can be expected to increase over time as more land is made available both directly by the Council and through the implementation of Local Plan policy after adoption.</p> <p>The proposed modification does not relate to policies S/7 (Development Frameworks) and S11 (Infill villages). These policies will be considered later in the examination process. Emerging changes in the Housing and Planning Bill will be considered as appropriate at that time.</p> <p>Policy H/10 concerning rural exception sites already allows for market housing to be provided to help subsidise the rural exception site affordable homes.</p> <p>The change responds to changing Government policy and to evidence of local need. There is no evidence that it would be damaging to wildlife. Biodiversity implications would be subject to assessment on a site by site basis as planning applications are</p>		

	made.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/7/I to the Examination Inspectors.

## Chapter 8: Building a strong and competitive economy

<b>Proposed Modification: PM/SC/8/A</b>			
<b>Provisional Modification: New Policy E/1B: Cambridge Biomedical Campus Extension</b>			
<b>Representations Received</b>	Support: 14	Object: 73	Total: 87
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Cambridge PPF</b> Welcome reference to the types of uses which can be accommodated on site, all occupiers should demonstrate why they need to locate here and what contribution they will make to the Cambridge Cluster.</li> <li>• <b>Cambridgeshire County Council</b> as landowner supports the allocation and policy.</li> <li>• Support but insufficient land allocated for economic growth. Land at Hinxton could be developed to provide a agri-tech / food / plant science hub.</li> <li>• <b>Historic England</b> do not object to the proposed allocation.</li> <li>• Will provide much needed space at CBC for expansion of life science research.</li> <li>• <b>Countryside Properties plc and Liberty Property Trust</b> The developers of the first phases of the Cambridge Biomedical Campus support the proposal. CBC is internationally recognised as a centre of excellence in clinical care, medical research and treatment. Following the successful phase 1 expansion which will be home to the MRC's Laboratory of Molecular Biology, Papworth Hospital and Astra Zeneca, proposals are already at an advanced stage for the phase 2 expansion in Cambridge. In order to ensure that this centre of excellence can continue to thrive, the proposal to allocate additional land to facilitate this is therefore supported.</li> <li>• <b>Anglian Water</b> Water infrastructure upgrades and diversion of assets may be required.</li> <li>• Required landscaping would increase biodiversity and enhance the appearance of the site.</li> <li>• <b>Cambridge Network</b> Support based on: the demand for business growth that we see, and the attractive nature of that growth; the shortage of suitable space, and the propensity of businesses to go elsewhere in the world if they can't get the space they view as suitable here; the understanding by businesses large and small that co-location is hugely important for accelerated innovation and R&amp;D excellence; the opportunity that the modification gives us to strengthen the world-class nature of the Cambridge Biomedical Campus and bring more businesses to life because of the location; small negative impact to the Green Belt and surroundings from the modification.</li> </ul>		

	<ul style="list-style-type: none"> <li>• <b>CPRE</b> do not object but wish to see the land safeguarded for future development rather than allocated.</li> <li>• <b>Cambridge University</b> supports the allocation but site will not be provide for the needs of the life sciences sector to 2031, more land is needed close to the campus.</li> <li>• Biomedical research is of great benefit to the local economy and humanity in general. Cambridge can become a world leader.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Does not maintain existing bridleways, provision for horse riders should be made.</li> <li>• Numerous objections concerning: damage to Nine Wells, loss of peace and tranquillity from development encroachment and increased footfall, loss of recreational area, urban sprawl, impact on landscape and views, harm to wildlife and the Local Nature Reserve, threat to the source of water for Hobsons Brook which is of heritage value (volume and quality), site at risk of flooding, will increase surface water flood risks elsewhere, loss of Green Belt, no exceptional circumstances, cause traffic congestion, no shortage of employment land within South Cambridgeshire, too close to the Nine Wells LNR, (numerous representations including a petition with 435 signatories).</li> <li>• <b>Natural England</b> does not object to the allocation but requires the policy to incorporate biodiversity enhancements to the LNR.</li> <li>• The <b>Wildlife Trust</b> objects to the omission of any mention of biodiversity, ecology and/or green infrastructure anywhere in the policy. The proposal site is close to a network of designated sites which are important for wildlife, including Nine Wells Local Nature Reserve (formerly a SSSI). Biological recording undertaken on the proposal site itself has confirmed the presence of a range of species, including breeding red and amber-listed farmland birds. Therefore biodiversity must be a key consideration in determining the suitability of this site for development. If it is to be allocated, the policy must include a requirement to retain a significant area of the site for biodiversity enhancements to achieve no net loss of biodiversity and ideally a net gain. This will require appropriate ecological surveys and monitoring, and production and implementation of an ecological management plan to achieve this. This will need to cover protection and enhancement of Nine Wells LNR and measures to mitigate or compensate for the loss of habitat for red and amber list farmland bird species. This is in line with national planning policy (NPPF paragraph 109) which requires councils to</li> </ul>
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	<p>consider and include opportunities for enhancement of the natural environment in their local plans. In particular, point b of the draft policy should refer to the need for not just an appropriate landscape setting for Nine Wells but to the need for an ecological buffer area to complement and enhance the habitat already present in the LNR. Points b and f are linked in their reference to access and public open space. Nine Wells is a particularly sensitive site which cannot cope with a significant increase in visitors. Therefore these two points should be reworded to ensure that designs of the open space within any proposed development would provide not only high quality open space for people, but also an attractive alternative to the LNR, to help limit additional access to and pressure on the LNR. In addition, given the uncertainty over whether the surface water flood risks can be adequately managed and mitigated for, we feel it is inappropriate to put this site forward for allocation at this time as it is not certain that point d (and potentially point c) can be resolved.</p> <ul style="list-style-type: none"> <li>• <b>Cambridge PPF</b> The policy should promote the restoration of the degraded freshwater ecology, and maintenance of the Local Nature Reserve.</li> <li>• <b>Cambridge University Hospitals</b> state that connection to the energy centre is subject to feasibility and viability.</li> <li>• <b>Great Shelford Parish Council</b> Southern Fringe AAP includes this land in area for countryside enhancement, Great Shelford Village Design Statement includes an aspiration to include this land as an extension to Nine Wells.</li> <li>• <b>Pigeon Land and LIH</b> No exception circumstances to justify Green Belt release, insufficient evidence, site is not sufficient to meet identified needs for bio-medical and healthcare life sciences research in close proximity to CBC and Addenbrooke's.</li> <li>• <b>Essex County Council</b> Could impact on roads in Essex.</li> <li>• CBC should not expand, employment in Cambridge must be reduced not expanded.</li> <li>• The <b>Cambridge University Botanic Garden</b> state that their grade II* listed landscape lake and stream are fed solely by Hobson's Conduit. They are concerned the development may affect water quality and quantity from the Nine Wells springs. A detailed hydrological assessment is needed of the consequences of development on the springs is needed.</li> <li>• The area is valuable for red list farmland birds of high conservation concern including skylark, linnet, yellowhammer, corn bunting and yellow wagtail. Above all the area is likely to be one of the leading sites for grey</li> </ul>
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	<p>partridge in Cambridgeshire, with at least 85 partridge in 2015. The species has declined by 91% in recent decades. The hedges on the southern edge of the field provide breeding sites for other red list species. PM/SC/8/A would be damaging to biodiversity.</p>
<p><b>Councils' Assessment</b></p>	<p>The key issues identified in the consultation response are support for the contribution the development of the site would make to life science research at the Cambridge Biomedical Campus, but objections in relation to impacts on flood risks and groundwater hydrology, biodiversity, setting of and impact on Nine Wells LNR, Green Belt and transport impacts.</p> <p>The possible availability of this site for development only became known after the publication of the Councils' Cambridge Inner Green Belt Boundary Study in November 2015 (RD/MC/030). This identified it as land which could be released from the Green Belt without significant harm to Green Belt purposes. The Councils consider that jobs and homes can provide exceptional circumstances justifying a change to the Green Belt in the Local Plan, but only where this would not cause significant harm to Green Belt purposes. This provisional Modification is therefore a response to the latest Green Belt assessment undertaken for the Councils by LDA Design (2015) that identified this area as one of two additional areas on the edge of Cambridge where land could be released for development without significant harm to Green Belt purposes. This provides an opportunity to allocate an extension to the Cambridge Biomedical Campus if development would be suitable and deliverable.</p> <p>The landowner's agent has confirmed that the land is available for development and their representation to the consultation was accompanied by a Flood Risk Constraints and Opportunities report by Peter Brett Associates. This provides a high level assessment of flooding and drainage affecting the site but given the tight timescales imposed by the site's late identification does not constitute a Flood Risk Assessment for planning purposes</p> <p>The report makes clear that further appraisal work is required including detailed modelling of surface water flood risk, assessment of groundwater hydrology, and scope for mitigation including opportunities to enhance local ecology along existing field ditches. The report concludes that the neighbouring development has demonstrated that residual risks can be overcome and that there is sufficient flexibility to engineer a solution with careful masterplanning on this site. Such mitigation measures could include: maintaining existing green field run-off rates, incorporating additional field drains and widening existing drains, creating surface water storage areas with measures to maintain water quality, and choosing suitable ground floor levels.</p>

	<p>It acknowledges that these measures will affect the developable proportion of the site whilst enhancing scope for habitat creation, and should be incorporated into the Masterplanning of the site. The report observes that a deed of grant has been agreed with the Hobsons's Conduit Trust to allow discharge into the Hobsons Conduit network for the adjacent CBC development in Cambridge and that a similar arrangement may be necessary for this site.</p> <p>A number of representations are concerned with biodiversity and habitat loss, and seek changes to the policy intended to achieve no net loss of biodiversity and ideally a net gain. The Wildlife Trust state that this will require appropriate ecological surveys and monitoring, and production and implementation of an ecological management plan. Local mitigation measures could include setting aside land on-site or in the vicinity of the site to provide an ecological buffer area to complement and enhance the habitat already present in the LNR. Off site mitigation enhancement would also serve to reduce the footfall in the LNR itself. To this end it is relevant to note that the site owner also owns additional farmland land to the east of the site.</p> <p>It seems clear from the representations made that further information is required concerning flood risk, hydrology, biodiversity and transport impacts to allow an informed decision to be made on the allocation of the site. It is understood that such studies normally take a number of months to complete having regard to the normal timescales for such work. It would be helpful to be able to provide the Inspector with an update by the time of the reconvened joint hearings anticipated in June. However, sufficient time should be available for completion of the studies and for the Council to consider its position on the provisional modification before the South Cambridgeshire specific hearings take place, given that the Inspector plans to concentrate on the examination of the Cambridge Local Plan following the joint hearings.</p> <p>On this basis it is recommended that a decision on this provisional allocation be deferred to allow time for additional evidence to be gathered which will address surface water flood risk, groundwater hydrology (including flow and quality), biodiversity and scope for mitigation and enhancement and transport impacts. If the Council concludes that the evidence supports the retention of the allocation, a number of wording changes to the policy are likely to be required to address these matters.</p> <p>Additional changes could also be made to the policy at that time to address the following issues raised in representations, including in relation to:</p>
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	<ul style="list-style-type: none"> <li>• Bridleways</li> <li>• Mitigating the impact of increased footfall on the LNR</li> <li>• Making it clear that providing an appropriate buffer for Nine Wells should include not building tight up to the south west corner of the site close to Nine Wells.</li> </ul> <p>The analysis of the significance of the site to Green Belt purposes set out in the Inner Green Belt Boundary Study (November 2015) is considered to be well founded. Exceptional circumstances justifying the release of land from the Green Belt for employment development in this location are as set out in the Proposed Modifications Joint Consultation Report of December 2015 at page 139.</p> <p>A number of representations in support and objecting to the allocation claim that the site will not provide for the future needs of the life sciences sector to 2031. The land needs of the life sciences sector has already been the subject of examination hearings in November 2014 (Matter 4 Employment and Retail).</p>
<b>Approach to Proposed Modification</b>	Defer decision making on the proposed modifications and the need for any further modifications to allow time for additional evidence to be gathered. Advise the Inspector that the Councils are working with the landowner to explore the suitability and deliverability of this site further and will advise of the outcome of that work in the summer.

<b>Proposed Modification: PM/SC/8/B</b>			
<b>Provisional Modification: New supporting text for Cambridge Biomedical Campus Extension</b>			
<b>Representations Received</b>	Support: 4	Object: 11	Total: 15
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Ely Diocesan Board of Finance</b> Support allocation, other sites around Cambridge should also be released from the Green belt to support employment development.</li> <li>• <b>Cambridge Network</b> This is a sensible allocation of land which will not have significant negative impact and is much needed to develop businesses for collaborative research and development within cycling or walking distance of the Biomedical Campus. In addition, support for the consideration of Cambridge South railway station which will enable ease of access and reduction in car congestion getting from the north of Cambridge.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Tall buildings are not acceptable and would be detrimental to views towards Cambridge. Damage to Nine Wells.</li> <li>• Dispute the Green Belt analysis, no employment land need</li> </ul>		

	<p>has been demonstrated, unsustainable.</p> <ul style="list-style-type: none"> <li>• Loss of Green Belt, urbanisation, adverse impact on LNR, loss of ecology, recreation.</li> <li>• The work on the campus is very important but further accommodation could be provided by building more densely rather than by site expansion.</li> <li>• <b>Pigeon Land and LIH</b> No exception circumstances to justify Green Belt release, insufficient evidence, site is not sufficient to meet identified needs for bio-medical and healthcare life sciences research in close proximity to CBC and Addenbrooke'.</li> <li>• While appreciating the desire to supply additional employment land, this particular location is inappropriate. Reasons: it would cause severe traffic congestion on both major and local roads; it would change the fine setting of the landscape; it would have a highly negative impact on the Nine Wells reserve; it would encourage, and probably lead to, overdevelopment of the Great Shelford area.</li> <li>• Sensitive site that should have already been rejected. Site ownership should not be taken into account.</li> </ul>
<b>Councils' Assessment</b>	<p>See the assessment under modification PM/SC/8/A.</p> <p>Site ownership has not been taken into account.</p> <p>The policy wording specifically provides for building heights no higher than those on the adjoining CBC campus and which step down on the southern, eastern and western site boundaries.</p> <p>Seeking to build the main CBC campus to higher densities has not been proposed by the site owner, and would in any event result in a much more intrusive and tall form of development. The great majority of the site is now been permitted and is now being developed which would limit the scope for such a form of development to the adjoining site on the existing southern edge of the existing CBC site.</p> <p>For transport matters see the assessment under modification PM/SC/2/N.</p> <p>Employment land issues have already been considered at the Matter 4 hearings in November 2014.</p>
<b>Approach to Proposed Modification</b>	<p>See the proposed approach under modification PM/SC/8/A.</p>

<b>Proposed Modification: PM/SC/8/C</b>			
<b>Policy E/2: Fulbourn Road East</b>			
<b>Representations Received</b>	Support: 5	Object: 1	Total: 6
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• <b>Anglian Water</b> support the amendment to the allocation and confirm that the site may require infrastructure and/or treatment upgrades to serve proposed growth or diversion of assets;</li> <li>• <b>Cambridge Network</b> supports the principle of allocations at South East Cambridge for housing at Worts' Causeway and the economic development via extensions to Peterhouse Technology Park in Policy E/2 of the South Cambridgeshire Plan;</li> <li>• <b>Historic England</b> welcomes the Study's recommendation that any land release in the north western corner of sub-area 13.1 should extend no further east than the Yarrow Road roundabout;</li> <li>• We positively support the main modification proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy as set out in paragraph 2.46.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• <b>CEG</b> Proposed allocation E/2 at Fulbourn Road must be reinstated to its original extent and this modification to text amended accordingly;</li> <li>• In relation to both allocation E/2 at Fulbourn Road and provisional new release south of Biomedical Campus, <b>CEG</b> object to Council's approach to defining boundaries which fails to provide clear and recognisable boundaries based on readily recognisable physical features which are likely to be permanent (NPPF para 85).</li> <li>• <b>CPRE</b> supports the LDA findings on the Green Belt which suggest a smaller extension than originally put forward. However with reference to the extension to the Biomedical Campus, we suggest that the land be safeguarded rather than allocated, as it is unlikely to be needed in the current plan period.</li> </ul>		
<b>Councils' Response</b>	<p>Support noted.</p> <p>At paragraph 3.15 of their submission on behalf of CEG, Tyler Grange challenge LDA Design's parameter for a Green Belt release in sub area 13.1 that it should extend no further east than the Yarrow Road roundabout, which LDA Design's Study states to be the furthest extent of the urban area from the historic core. Tyler Grange have set out three grounds for arguing that the urban area extends further east than the Yarrow Road roundabout but LDA Design does not accept these. Development west of Yarrow Road on the north side of Fulbourn Road is typical medium density</p>		

	<p>suburban development, unmistakably part of the urban area, and it is entirely appropriate that it is not included in Green Belt. East of Yarrow Road is existing Green Belt and development in this area comprises scattered buildings within an extensive green, landscaped setting, namely the redeveloped almshouses, Fulbourn Hospital and Capital Park. The great majority of the buildings in this area are set 150 metres or more back from Cambridge Road, giving it a green, rural character which does not change until the Yarrow Road roundabout.</p> <p>Tyler Grange (at para 3.18 of their submission) argue that a boundary aligning with the Yarrow Road roundabout would not be compliant with NPPF paragraph 85 which requires Green Belt boundaries to be defined clearly, using physical features that are readily recognisable and likely to be permanent. A number of previous Green Belt releases and development allocations around Cambridge in recent years have created new Green Belt boundaries which do not follow pre-existing landscape features (e.g. North West Cambridge, Trumpington Meadows and Glebe Farm). However, masterplans have been developed for the released land which create strong, clear and defensible Green Belt boundaries moving forward. In the case of Addenbrooke's Road between Hauxton Road and the A1301, the scheme has been built out and now creates a strong, clear and defensible boundary that is likely to be permanent. It is anticipated that the same approach will be taken in relation to the proposed releases and allocations.</p> <p>The Fulbourn Road East site represents a sustainable site on the edge of Cambridge. The Council has allocated this site to retain flexibility for employment development to occur within the plan period, responding to Green Belt assessment and subject to causing no significant harm to Green Belt purposes.</p>
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/8/C to the Examination Inspectors

<b>Proposed Modification: PM/SC/8/D Paragraph 8.54</b>			
<b>Representations Received</b>	Support: 0	Object: 2	Total: 2
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Provide infill development using industrial sites, relocating businesses nearer to main roads.</li> <li>• Employment at settlements outside Cambridge needs to be vigorously encouraged in order to reduce the amount of travelling into Cambridge that is needed. The ministerial</li> </ul>		

	statement, in so far as it gives any blanket provision to turn employment sites in settlements outside Cambridge into residential sites, needs to be resisted (the opposite applies to employment sites inside Cambridge).
<b>Councils' Assessment</b>	This modification is not seeking to change the policy in the Local Plan, the proposed change is simply to clarify that the policy does not apply where the change of use is permitted development, as brought forward through the Written Ministerial Statement – 25 March 2015.
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/8/D to the Examination Inspectors.

## Chapter 10: Promoting and Delivering Sustainable Transport and Infrastructure

Proposed Modification: PM/SC/10/A New paragraph after 10.42			
<b>Representations Received</b>	Support: 1	Object: 2	Total: 3
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>Welcome proposals to support those wishing to build their own homes as a way of delivering affordable and sustainable housing.</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>The evidence of Cambourne to date is that most journeys are at odds with the transport infrastructure plans. Employment sites are not local and there is a great deal of traffic to London via Royston and St Neots railway stations, as well as to sites in Cambridge not easily reached by public transport. A busway to Madingley P&amp;R will not change this as new employment centres are to the south of Cambridge. All buildings should contribute and none should be exempt.</li> <li>This section simply isn't strong enough. Development should be halted until transport systems can handle current traffic levels. If housing developers are not willing to contribute to large capital projects (such as the A14 widening) they should not get planning permission. There should be no development in Cambridge until journey times are improved.</li> </ul>		
<b>Councils' Assessment</b>	<p>The objections do not relate to the proposed modification, which is intended to ensure the Local Plan is consistent with national planning practice guidance.</p> <p>Note: Transport issues are addressed under modification PM/SC/2/N.</p>		
<b>Approach to Proposed Modification</b>	<p>No Change. Submit proposed modification PM/SC/10/A to the Examination Inspectors.</p>		



## Minor Modifications

### Chapter 2: Spatial Strategy

Proposed Modification: MM/SC/2/A Paragraph 2.11			
<b>Representations Received</b>	Support: 0	Object: 4	Total: 4
<b>Main Issues</b>	<p><b>Support</b></p> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <p><b>Object</b></p> <ul style="list-style-type: none"> <li>• Councils have not compared Bourn Airfield and West Cambourne Sites fairly regarding Sustainability. Have considered impact on Green Belt, but not separation of new settlements from other villages.</li> <li>• No evidence to show that new development sites are more favourable in terms of sustainability than Cambridge Fringe areas.</li> </ul>		
<b>Councils' Assessment</b>	<p>The SA appropriately considers a range of sites and strategy alternatives related to the development sequence, and provides information on the economic, social and environmental impacts of the different options, including comparisons of edge of Cambridge development with new settlements. The SA sets out the reasons for the Councils preferred approach, and the weighting of different sustainability issues.</p> <p>Both Bourn Airfield, Cambourne West, and other sites have been subject to the same site appraisal process. Green Belt was identified as a sustainability objective for testing, but clearly only applied to Green Belt areas. In all areas, landscape and townscape was considered.</p> <p>Detailed issues regarding the SA are considered against representations made on the SAA document. The modification to reference the SA work in the Local Plans is sound.</p>		
<b>Approach to SAA Addendum section.</b>	No change. Submit proposed modification PM/SC/2/A to the Examination Inspectors.		

## Chapter 7: Delivering High Quality Homes

Proposed Modification: MM/SC/7/A Paragraph 7.59			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	The proposed modification is to ensure consistency with the Planning Policy for Traveller Sites – 31 August 2015.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification MM/SC/7/A to the Examination Inspectors.		

Proposed Modification: MM/SC/7/B Paragraph 7.78			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	The proposed modification is to ensure consistency with the Planning Policy for Traveller Sites – 31 August 2015.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification MM/SC/7/B to the Examination Inspectors.		

Proposed Modification: MM/SC/7/C Paragraph 7.79			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	The proposed modification is to ensure consistency with the Planning Policy for Traveller Sites – 31 August 2015.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification MM/SC/7/C to the Examination Inspectors.		

## Chapter 9: Promoting Successful Communities

<b>Proposed Modification: MM/SC/9/A Paragraph 9.65</b>			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	The proposed modification adds clarity and refers to the planning practice guidance for updates.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification MM/SC/9/A to the Examination Inspectors.		

## Glossary

Proposed Modification: PM/SC/G/A Glossary			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	The proposed modification ensures that the Local Plan is consistent with national policy, as set out in the planning practice guidance which was published at the time of submission of the Local Plan.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/G/A to the Examination Inspectors.		

Proposed Modification: PM/SC/G/B Glossary			
<b>Representations Received</b>	Support: 0	Object: 0	Total: 0
<b>Main Issues</b>	<b>Support</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul> <b>Object</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>		
<b>Councils' Assessment</b>	The proposed modification is to ensure consistency with the Planning Policy for Traveller Sites – 31 August 2015.		
<b>Approach to Proposed Modification</b>	No Change. Submit proposed modification PM/SC/G/B to the Examination Inspectors.		