

Proposed Modifications Report on Consultation

Member Version

March 2016



Cambridge Local Plan

South Cambridgeshire Local Plan

Proposed Modifications – Report on Consultation

March 2016

1. Introduction

Purpose of Document

- 1.1. This document follows consultation on proposed modifications to the Cambridge Local Plan and South Cambridgeshire Local Plan held between 2 December 2015 and 25 January 2016. The proposed modifications and the supporting additional evidence address the issues raised by the Inspectors holding the examinations into the Local Plans in their preliminary conclusions letter of 20 May 2015.
- 1.2. This document identifies the number of representations received to each proposed modification, a summary of the key issues raised, and the Councils' assessment. The Councils' then reach a conclusion on whether or not to carry for the proposed modification as consulted on, to carry forward with amendments, or to include a new proposed modification. The final proposed modifications respond to the Inspectors' letter, as informed by the consultation are contained in a separate document.

Background

- 1.3. The Councils submitted the Cambridge and South Cambridgeshire Local Plans for examination on 28 March 2014. The separate plans were prepared in parallel, with a high level of joint working throughout the process. This reflects the close functional relationship between the two areas and responds to the duty to cooperate. This relationship has been recognised at a national level through the Greater Cambridge City Deal agreement with Government that was signed in 2014. It brings up to £500 million of grant funding to help deliver infrastructure to support growth in the area with its highly successful economy.
- 1.4. Joint examination hearings on strategic issues were held between November 2014 and April 2015, including housing and employment needs, development strategy, Green Belt, transport, infrastructure and housing supply. The Inspectors wrote to the Councils on 20 May 2015 in relation to three main issues and invited the Councils to undertake additional work to address those issues before the examinations progress further. The issues are in relation to:
 - Objectively Assessed Need for new housing
 - Overall Development Strategy
 - Conformity with revisions to National Planning Policy since the Local Plans were submitted for examination.

- 1.5. The Councils agreed to undertake additional work and the examinations were formally suspended on 28 July 2015 until March 2016.

Consultation on Proposed Modifications

- 1.6. The Councils undertook further work to address the issues raised by the Inspectors, considered the outcome of that work, and identified some changes (Modifications) to the Local Plans that arose from that additional work. The work undertaken and the resulting Modifications are summarised in chapters 3, 4 and 5 of this document. They were contained in a Joint Consultation Report (December 2015 – RD/MC/010).

2. Results of consultation

Representations received

- 2.1. A total of 894 representations were received to the Proposed Modifications joint consultation from a range of stakeholders, individuals and promoters of development sites either included in the submitted plans or promoting alternative sites. Of these, 249 were supporting the proposed modifications and 645 were objecting across both Local Plans. A further 143 representations were received to the accompanying Sustainability Appraisal Addendum, of which there were 9 supports and 134 objections.
- 2.2. These relate to each plan as follows:
 - Cambridge Local Plan: 229 representations, 94 supports and 135 objections
 - South Cambridgeshire Local Plan: 665 representations, 155 supports and 510 objections
- 2.3. All representations can be viewed in full on the Councils' websites at: <http://scams.jdi-consult.net/localplan/index.php>.
- 2.4. A document listing summaries of all representations in Proposed Modification order is included in the examination library as RD/MC/ XXX.

Councils' Assessment

- 2.5. The Councils have considered all the representations received and assessed in light of the issues raised, whether the Proposed Modifications should be submitted to the Inspectors as consulted on, with amendments or not at all. Any new Proposed Modifications considered necessary in response to issues raised during the consultation have also been identified.
- 2.6. This process is documented in Proposed Modification order and grouped by the issues raised by the Inspectors in their letter of 20 May 2015. These are contained in Appendix A. The Appendix provides an index to the Proposed Modifications tables, showing which modification is the primary place where the Councils' assessment is provided for each issue. It also shows if there are supporting modifications for any issue. The Councils' assessment in the supporting modifications generally cross refers to the primary modification to minimise repetition and ensure an holistic response to each issue is provided.

- 2.7. The main issues and the Councils' assessment are summarised in the following chapters, taking each of the three main issues raised by the Inspectors in turn.

Approach to Proposed Modifications

- 2.8. Having considered and assessed the representations received, the Councils have reached a conclusion on the Proposed Modifications to be submitted to the examination Inspectors. The majority of the Modifications consulted on are submitted unchanged. A few amendments are proposed in light of the consultation. The broad conclusions for each of the three main issues raised by the Inspectors are included in the following chapters. The conclusions for each modification consulted on are contained in Appendix A, including where an amendment or additional modification is proposed. The main changes from the Proposed Modifications consulted on can be summarised as follows:

Cambridge Local Plan:

- Additional text relating to the Development Strategy and the further work undertaken (PM/CC/2/E)
- New modification to include Newbury Farm (0.9ha) within the GB2 allocation. This extends the line of the eastern boundary down to Babraham Road and is consistent with the finding of the Cambridge Inner Green Belt boundary study (2015) (PM/CC/2/A(i), PM/CC/B/B, PM/CC/Policies Map/B)
- Correction to the housing number relating to the total housing provision in the Cambridge urban area to read 6828 not 6282 (PM/CC/2/I(i))
- Additional text relating to listed buildings and the application of Policy 27 (Sustainable Design and Construction) in order to ensure no harm to heritage assets (PM/CC/4/A(i)).

South Cambridgeshire Local Plan:

- Provisional Modification to allocate land south of the Cambridge Biomedical Campus (Policy E/1B) is recommended to be deferred, in order to obtain further evidence (PM/SC/8/A). The deferment will also apply to the following proposed modifications insofar as they relate to the proposed allocation on land south of the CBC (PM/SC/2/G, PM/SC/2/O, PM/SC/2/P, PM/SC/3/F, PM/SC/8/B)
- Additional text relating to the Development Strategy and the further work undertaken (PM/SC/2/C)
- Correction to the housing number relating to the total housing provision in the Cambridge urban area to read 6828 not 6282 (PM/SC/2/E)

- Policy H/8 Housing Mix - additional wording added to sub section (g) in relation to self and custom build houses to reflect that self and custom build is not likely to be practical in high density multi storey flatted developments (PM/SC/7/G)

2.9. The Proposed Modifications arising from the further work and consultation to be submitted to the Inspectors are published in separate documents for each Local Plan:

- Cambridge Local Plan Proposed Modifications March 2016 (RD/MC/XXX)
- South Cambridgeshire Local Plan Proposed Modifications March 2016 (RD/MC/XXX).

3. Objectively Assessed Need for New Housing

Issues raised by the Inspectors

- 3.1. The Inspectors asked the Councils to consider whether the DCLG 2012 based household projections (published February 2015) suggest a different level of housing need for Cambridge and South Cambridgeshire.
- 3.2. The Inspectors said there is no evidence that the Councils have carried out the kind of assessment of market signals envisaged in the Planning Practice Guidance (PPG) dated 6 March 2014, or considered whether an upward adjustment to planned housing numbers would be appropriate.
- 3.3. The Inspectors said that there should be clear evidence that the Councils have fully considered the implications and likely outcomes of an upward revision in housing numbers on the provision of affordable housing.

Additional work undertaken by the Councils

- 3.4. In response to these issues raised by the Inspectors, the Councils commissioned further independent assessment. This work, relating to Objectively Assessed Need for Housing¹, sits alongside the Cambridge Sub Region Strategic Housing Market Assessment (SHMA)², and considered the following issues raised by the Inspectors with the stated conclusions:
 - Whether the 2012-based DCLG household projections published in February 2015 suggest a different level of need;
 - Whether an assessment of market signals justifies an uplift to these DCLG demographic projections;
 - Whether they should be increased in order to provide more affordable housing.
- 3.5. The Objectively Assessed Housing Need: Further Evidence study³ addresses a recognised limitation of the DCLG household projections for Cambridge and

¹ Cambridge and South Cambridgeshire Local Plan Examination – Objectively Assessed Housing Need: Further Evidence (RD/MC/040).

² [Cambridge Sub-Region Strategic Housing Market Assessment](#) (RD/Strat/090)

³ Cambridge and South Cambridgeshire Local Plan Examination – Objectively Assessed Housing Need: Further Evidence (RD/MC/040).

proposes an appropriate demographic starting point of 10,069 new dwellings. It confirms the DCLG projection of 17,579 new dwellings as appropriate for South Cambridgeshire. Against these figures, which national guidance states provide the starting point for considering housing need, the study concludes there should be an uplift of 30% for Cambridge and 10% for South Cambridgeshire to take account of market signals in each area, giving figures of 13,090 homes for Cambridge and 19,337 homes for South Cambridgeshire.

- 3.6. The study refers to there already being in place, through the SHMA, an analysis of the housing required to support future employment growth. Therefore there are two alternative housing need figures: the new projection, based on past demographic trends and market signals, and the SHMA projections, which take account of future employment. For South Cambridgeshire the SHMA figure is fractionally below the new need assessment of 19,337 dwellings. The new figure took account of past demographic trends and market signals but not future jobs. The SHMA figure suggests that, if housing is built in line with our assessment, it will provide very slightly more workers than are required to support expected job growth. Hence there is no justification for a 'jobs uplift' to the new assessment. Conversely, for Cambridge City the SHMA figure is above the new assessed need of 13,090 dwellings. This suggests that, if housing is built in line with the new assessment, the city will provide slightly fewer workers than are required to support the expected job growth. Hence the new assessment should be adjusted upwards, to provide 14,000 dwellings as shown in the SHMA.
- 3.7. On this basis, the study concludes that Objectively Assessed Housing needs in the study area are:
- 19,337 dwellings for South Cambridgeshire
 - 14,000 dwellings for Cambridge.
- 3.8. These housing numbers are consistent with past demographic trends as adjusted for market signals in each local authority area (as advised by the PPG), and also provide enough labour to support expected job growth as part of an HMA-wide strategy.
- 3.9. This endorses the current requirement of 14,000 homes for Cambridge and indicates that the current figure for South Cambridgeshire of 19,000 homes should be increased to 19,500 (rounded). Consideration of affordable housing need did not result in any further recommendations.

3.10. This issue is addressed in the Development Strategy Update document.⁴

Proposed modifications consulted on

3.11. The key modifications consulted on are summarised below. Please see the full schedules of modifications in Appendices A – D of the Joint Consultation Report December 2015 (RD/MC/010).

Main Modifications Proposed to the Cambridge Local Plan in respect of Objectively Assessed Need

3.12. **Housing Requirement** - While there are no changes to the Objectively Assessed Need for Housing in Cambridge, a main modification to the Cambridge Local Plan was proposed in order to reflect the work undertaken: (Main Modification PM/CC/2/B to paragraph 2.17).

Main Modifications Proposed to the South Cambridgeshire Local Plan in respect of Objectively Assessed Need

3.13. **Housing Requirement** – A main modification was proposed to increase the housing requirement for South Cambridgeshire from 19,000 to 19,500 homes, in response to the findings of the Councils' further evidence work on Objectively Assessed Need for new homes. The Modification goes half way to incorporating the commitment made by the Councils through the City Deal to provide an additional 1,000 dwellings on rural exception sites over the 19,000 figure included in the submitted plan. A number of other main modifications were proposed to update the supporting text of the plan: (Main Modification PM/SC/2/H in relation to Policy S/5: Provision of New Homes and Jobs).

Summary of Consultation Responses

3.14. A number of representations relating to objectively assessed need for new housing and the Councils' further work were received. The main issues are outlined below:

- Will not boost housing supply

⁴ Cambridge and South Cambridgeshire Development Strategy Update, November 2015, RD/MC/060

- Not compliant with national guidance
- Does not take appropriate account of market signals
- No account taken of past suppression of household formation
- Jobs and homes will not balance leading to unsustainable increases in in-commuting
- Does not make sufficient provision to address need for affordable housing in Cambridge
- Does not take appropriate account of migration
- That the market signals uplifts should be higher than 30% for Cambridge and 10% for South Cambridgeshire
- That the Objectively Assessed Housing need dwelling numbers (OAN) should be substantially higher for both Cambridge and South Cambridgeshire.

Councils' Assessment

- 3.15. The OAN for both Councils' will boost housing supply. The issue of compliance with national policy has already been considered at examination hearings and the Further Evidence report by PBA ensures consistency with national guidance. The concerns expressed in representations concerning market signals are not considered to be well founded. There is no justification for an upward adjustment to CLG 2012 household formation rates. It is accepted that the starting point demographic projections have understated future housing need and the Councils' have already addressed this by uplifts of 30% for Cambridge and 10% for South Cambridgeshire. The related issues of jobs/homes balance and commuting have already been considered at examination hearings. The Councils maintain that across the full Housing Market Area there is a good balance between jobs and homes. Regarding migration this has already been taken into account in the SHMA, and the Councils have not received any requests from other local planning authorities under the duty to co-operate for this area to take more housing. In respect of a further uplift to boost affordable housing supply the Councils' consider that the plans provide for a realistic proportion of affordable need to be met in Cambridge.

Update to the evidence base

- 3.16. Peter Brett Associates have prepared a report for the Councils' entitled 'Objectively Assessed Housing Need: Response to Objectors' in March 2016 which looks again at demographic projections, market signals and affordable

housing. This has helped to inform the Councils assessment and is published as reference document RD/MC/041.

Approach to Proposed Modifications

Submit proposed modifications relating to Objectively Assessed Needs for new housing (PM/CC/2/B, PM/SC/2/A, PM/SC/2/H, PM/SC/2/I, PM/SC/2/J, PM/SC/2/K, PM/SC/2/L) to the Inspectors unchanged.

4. Overall Development Strategy

Issues raised by the Inspectors

- 4.1. The Inspectors raised issues about the apparent inconsistency between the Cambridge and South Cambridgeshire Sustainable Development Strategy Review⁶ (SDSR) and the Plans' reliance on meeting development needs in new settlements. In particular, they raised questions about the previous work related to the review of the Inner Green Belt Boundary (2012), in particular the clarity of the review's methodology, and the role of the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process. The Inspectors also raised questions about the infrastructure requirements and sustainable transport options needed to deliver sustainable new settlements.

Councils' Response

- 4.2. In response to these concerns, the Councils carried out or commissioned new⁵ studies to review the evidence on Green Belt, transport, infrastructure and viability to ensure that the decision on the preferred strategy is based on a full understanding of the implications of the different strategy options. An addendum to the Sustainability Appraisal⁶ was also carried out to ensure that the sustainability issues of the options available to the Councils are understood, in particular land on the edge of Cambridge and new settlements. The new evidence documents are:

- Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060);
- Cambridge and South Cambridgeshire Local Plans Sustainability Appraisal Addendum Report (RD/MC/020);
- Cambridge Inner Green Belt Boundary Study (RD/MC/030);
- Local Plans CSRM – Cambridge and South Cambridgeshire
- Local Plans Transport Report (RD/MC/070);
- Cambridge and South Cambridgeshire Infrastructure Delivery Study 2015 (RD/MC/080); Cambridge and South Cambridgeshire Local Plans Viability Update, November 2015 (RD/MC/090).

⁶ Cambridge and South Cambridgeshire Local Plans SA Addendum Report, RD/MC/020

- 4.3. The Councils prepared a Development Strategy Update⁷ document that draws together and assesses the evidence prepared by independent consultants. It also takes account of the findings of the Sustainability Appraisal Addendum. It considers whether the strategy in the submitted Local Plans remains the most appropriate taking account of the outcomes of the further evidence.
- 4.4. The Councils have been clear that they recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation, although it makes clear that major new development on the edge of Cambridge on congested radial routes have their own transport issues and are not necessarily cheap to deliver. The independent Green Belt evidence supports the findings of the Councils' own evidence that release of land on the edge of Cambridge can be expected to compromise substantially the purposes of the Cambridge Green Belt, with two exceptions and modifications were proposed to respond to these to:
- Reduce the size of an employment allocation in the submitted South Cambridgeshire Local Plan (see Main Modification PM/SC/8/C).
 - Propose a new employment allocation as an extension to the Cambridge Biomedical Campus, within South Cambridgeshire (see Provisional Main Modification PM/SC/8/A).
- 4.5. The evidence also looks at the potential to deliver sustainable new settlements as an alternative to sites on the edge of Cambridge. This concludes that new settlements can provide viable and deliverable developments that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, attracting significant levels of patronage, and also provide wider benefits to existing communities. The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.
- 4.6. Some key comparisons between edge of Cambridge sites and new settlements are:

Transport:

⁷ Cambridge and South Cambridgeshire Development Strategy Update, November 2015, RD/MC/060

- Edge of Cambridge - criteria testing transport issues show positive impacts due to short distances to the city, low public transport journey times, and in many cases proximity to high frequency public transport.
- New settlements – transport criteria highlight opportunities to serve sites by high quality public transport, but journey times and cycling distances are higher when compared to edge of Cambridge options.

Access to Jobs:

- Edge of Cambridge - offers proximity to major employment sites within the city.
- New settlements - have potential to include new employment development but there would be longer journeys to jobs in and around Cambridge.

Services and Facilities:

- Edge of Cambridge - dependent on the scale of an edge of Cambridge site, it would include new local or district centres. Would require significant infrastructure provision such as education and utilities.
- New settlements - would include new town and local centres which would mean residents have convenient access to local services and facilities by walking, cycling and public transport. Would require significant infrastructure provision such as education and utilities. However, they would be further from Cambridge, which remain the key centre of services and employment in the area.

Greenfield / Brownfield Land:

- Edge of Cambridge sites - are almost entirely agricultural land.
- New settlements - offer opportunities to re-use areas of previously developed land, although would still require large areas of agricultural land to be developed.

Green Belt / Landscape / Townscape Impacts:

- Edge of Cambridge - major developments would have significant negative impact on Green Belt, landscape and townscape.
- New settlements - outside the Green Belt.

4.7. Having weighed all those factors, the Development Strategy Update document concludes that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period that will provide a range of deliverable sites for the plan period and beyond and considers that sustainability will be secured. More information on the evidence documents that informed this conclusion is provided below.

Cambridge Inner Green Belt Boundary Study, 2015

4.8. In response to the Inspectors' issues about the Councils' 2012 Inner Green Belt Boundary Study⁸, the Councils commissioned LDA Design to undertake the following:

- To undertake 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.
- To review the methodologies put forward by objectors in relation to the Inner Green Belt Boundary.

4.9. The detailed findings of this work are set out in the Cambridge Inner Green Belt Study, November 2015 report⁹, which is published alongside this consultation document.

4.10. 19 sectors of the Inner Green Belt are identified and assessed in the Cambridge Inner Green Belt Boundary Study (2015) to understand their importance to the performance of Green Belt purposes. The 16 qualities identified in the study are used as the criteria for the assessment. Most sectors are divided into sub areas, where the assessment of one or more criteria differs between one part of the sector and another. The assessment shows that all areas of land within the study area (with the exception of one small area, sub area 8.2 which covers land at and adjacent to Shelford Rugby Club) are important to Green Belt purposes but the reasons differ from one area to another.

4.11. Whilst virtually all areas of land within the study area have been assessed as being of importance to Green Belt purposes, consideration was given as to whether it may nevertheless be possible for certain areas of land to be released from the Green Belt for development without significant harm to

⁸ 2012 Inner Green Belt Boundary Study RD/Strat/210

⁹ Cambridge Inner Green Belt Boundary Study (2015), RD/MC/030

Green Belt purposes. This has been assessed for each sector and a number of areas have been identified around the south and south-east of the city where limited development, if handled appropriately, could take place without significant harm to Green Belt purposes. In each case, parameters are set for any such development to avoid significant harm to the purposes of the Green Belt.

- 4.12. A number of the areas identified within the study as having potential for release from the Green Belt without significant harm to the Green Belt purposes have already been proposed for release from the Green Belt as part of the submitted Local Plans. However, a further area of land within Sector 10 in the study was also identified as having potential for release without significant harm to Green Belt purposes. In this instance, the land lies in both Councils' administrative areas and is described as land south of Bell School and land south of Cambridge Biomedical Campus.
- 4.13. The land south of Bell School lies within Cambridge's administrative area and is directly adjacent to the residential development known as Bell School. This site was subject to further assessment by Cambridge City Council in order to establish whether it would be suitable for development. Due to significant constraints on the site in relation to flood risk, as parts of the site are located in the high risk flood zone, Cambridge City Council has not put this site forward as a modification to the submitted Cambridge Local Plan.
- 4.14. The land south of Cambridge Biomedical Campus lies within South Cambridgeshire's administrative area and is directly adjacent to the Phase 2 land for the Cambridge Biomedical Campus allocated for development in the adopted Cambridge Local Plan 2006. The site was subject to further assessment by South Cambridgeshire District Council and considered suitable for development for employment use, subject to further modelling work being carried out to assess surface water flood risk in this area. As such, this site is included as a provisional main modification to the submitted South Cambridgeshire Local Plan (see Provisional Main Modification PM/SC/8/A).

Infrastructure requirements, viability and sustainable transport options for new settlements

- 4.15. The Inspectors' letter notes that if development is to be directed to new settlements rather than the edge of the urban area, it needs to be clear that the challenges of making such development as sustainable as possible have been addressed, in particular infrastructure requirements and sustainable

transport options for new settlements. This is in response to evidence submitted to the Local Plan examination which indicates that a significant funding gap exists in relation to infrastructure provision.

- 4.16. In response to these concerns, a number of additional studies have been undertaken. The Cambridge and South Cambridgeshire Local Plans Viability Update (November 2015)¹⁰ provides an update of the viability assessments prepared for the Councils to support the submission Local Plans¹¹. The 2015 Update ensures that the inputs are up to date, including changes to any of the key inputs such as land and build costs. It considers impacts of changes to Government policy, for example the removal of the Code for Sustainable Homes and different space and accessibility standards. It specifically considers the particular costs associated with new settlements.
- 4.17. Running in parallel to the Viability Update work, the Cambridge and South Cambridgeshire Infrastructure Delivery Study 2015¹², provides an update to the Cambridge and South Cambridgeshire Infrastructure Delivery Study¹³, using updated information on infrastructure delivery costs and sources of funding. This has taken account of progress related to City Deal transport schemes, the availability of City Deal funding, as well as providing more information related to the delivery of major development sites.
- 4.18. New transport modelling has also been undertaken in order to compare development strategy options with significant edge of Cambridge development on a like for like basis with new settlement or village focussed development strategies. It also includes updated modelling of the Local Plan development trajectories to reflect proposed modifications. This work is set out in further detail in the Local Plans CSR – Cambridge and South Cambridgeshire Local Plans Transport Report, November 2015¹⁴.

¹⁰ Cambridge and South Cambridgeshire Local Plans Viability Update, November 2015, RD/MC/090

¹¹ [Strategic Housing Land Availability Assessment \(SHLAA\) and Potential Site Allocations High Level Viability Assessment \(RD/Strat/150\)](#); [Supplementary Report Small Sites – Affordable Housing Viability](#), Cambridge City Council (RD/H/320); [Student Accommodation – Affordable Housing Financial Contributions Viability](#) (Cambridge City Council) (RD/H/340); [Community Infrastructure Levy Viability Assessment, Cambridge City Council \(RD/T/200\)](#) and [Local Plan Submission & Community Infrastructure Levy Preliminary Draft Charging Schedule Consultation Viability Study](#), South Cambridgeshire District Council (RD/T/220).

¹² Cambridge and South Cambridgeshire Infrastructure Delivery Study 2015, RD/MC/080

¹³ [Cambridge City & South Cambridgeshire Infrastructure Delivery Study](#), RD/T/010 and [Cambridge City & South Cambridgeshire Infrastructure Delivery Study Update](#), RD/T/020

¹⁴ Cambridge and South Cambridgeshire Local Plans Viability Update, November 2015,

Housing Land Supply

- 4.19. The Councils agreed a Memorandum of Understanding (MoU) on the Greater Cambridge Joint Housing Trajectory in September 2014. This MoU set out the agreement between the two Councils under the Duty to Co-operate that the housing trajectories for the two local authorities should be considered together for the purposes of phasing housing delivery, and for calculating five year housing land supply for plan-making and decision-taking. The Councils' statement to the Local Plan Examination hearing for Matter 1: Legal Requirements set out proposed modifications to the Local Plans to give effect to the MoU and the merits of the MoU were considered at the hearing for Matter 8: Housing Land Supply and Delivery.
- 4.20. The merits of the MoU and the Greater Cambridge Joint Housing Trajectory were not addressed in the initial conclusions from the Inspectors. The public consultation on the additional work sought by the Inspectors provided an opportunity for consultation on the proposed modifications to give effect to the MoU and the Greater Cambridge Joint Housing Trajectory.
- 4.21. Consequential to the work on Housing Needs and Development Strategy, an updated paper on Housing Land Supply¹⁵ was also prepared. This includes an update on the situation in relation to Land North of Cherry Hinton (Cambridge East) where discussions with the two promoters of the site demonstrate that a larger part of the land allocated in the adopted Cambridge East Area Action Plan can come forward for development with the Airport remaining, making best use of suitable land at the second stage in the development sequence.
- 4.22. The submitted Local Plans included a provision across both districts of 460 homes. The evidence now demonstrates that 1,200 homes can be safely provided, with 780 in Cambridge and 420 in South Cambridgeshire, together with provision of a primary school, a local centre and a spine road between Cherry Hinton Road and Coldham's Lane. A significant shortfall in school capacity across the City is currently forecast from 2018, which coupled with proposed development north of Newmarket Road and north of Cherry Hinton, will require the early provision of the secondary school. Residential

RD/MC/090

¹⁵ Housing Land Supply Update, Cambridge City Council and South Cambridgeshire District Council, RD/MC/050

development on land north of Coldham's Lane, Church End and Teversham Drift (R47) should not come forward before there is an agreed approach to the delivery of sufficient secondary school capacity in the area. This development significantly improves housing land supply in Cambridge to 14,682 homes.

- 4.23. The Housing Land Supply Update paper also takes a more conservative approach to the annual build out rates at new settlements based on lessons learned from Cambourne than previously assumed, but allowing for earlier starts on site for Waterbeach and Bourn Airfield if these can be achieved. Overall, the evidence in the joint housing trajectory shows that the Councils have 5 year housing land supply over the plan period.
- 4.24. The Parish Councils of Graveley and also of Great and Little Abington are promoting a number of small scale housing developments through the South Cambridgeshire Local Plan process to meet identified local housing needs, as an alternative to taking forward Neighbourhood Plans.
- 4.25. The Parish Councils consulted local people about whether the sites should be developed and the results of their consultations demonstrated that there was clear local support. These Parish-led sites were put forward to South Cambridgeshire District Council just before the submission of the Local Plan and therefore main modifications proposing their allocation for housing development were submitted alongside the Local Plan. The public consultation on the additional work sought by the Inspectors provided an opportunity for district-wide consultation on these main modifications ahead of consideration of the proposals at the examination.

Sustainability Appraisal/Strategic Environmental Assessment process

- 4.26. The Inspectors raised a number of issues in relation to the Councils' Sustainability Appraisals. These included:
- The need to revisit the Sustainability Appraisals to appraise all reasonable alternatives to the same level;
 - That it was difficult to understand how the various dimensions of sustainability were assessed with regards to paragraph 85 of the NPPF;

- The inconsistency between the Cambridge and South Cambridgeshire Sustainable Development Strategy Review¹⁶ and the Plans' reliance on meeting development needs in new settlements.
- 4.27. In response to the Inspectors' concerns, a joint addendum to the Councils' Sustainability Appraisals¹⁷ was produced which sets out how the different options for the overall development strategy were assessed, including the need to promote sustainable patterns of development in light of paragraph 85 of the NPPF¹⁸. The addendum also includes an appraisal of reasonable alternatives, including sites on the urban edge, on a comparable basis. As part of this work, further transport modelling of the edge of Cambridge sites was undertaken to provide an appropriate level of information so as to facilitate comparative assessment with the proposed new settlements.
- 4.28. The results of this work are set out in the Cambridge and South Cambridgeshire Local Plans Sustainability Appraisal Addendum Report and were made available for consultation alongside the proposed modifications. The findings of the Sustainability Appraisal Addendum Report are not significantly different from those of the appraisals submitted with the Local Plans.
- 4.29. The appraisal notes that while edge of Cambridge sites perform well in some areas, such as promoting sustainable modes of transport, they do not perform well in other areas such as protecting the landscape character and setting of Cambridge as a result of loss of Green Belt land. New settlements avoid these significant Green Belt impacts whilst providing opportunities for strategic transport improvements to serve the development and existing rural communities, while providing services and facilities within easy access for the new community.
- 4.30. The key modifications arising from this work are summarised below. Please see the full schedules of modifications in Appendices A – D of the Joint Consultation Report December 2015 (RD/MC/010).

¹⁶ [Cambridge and South Cambridgeshire Sustainable Development Strategy Review](#), RD/Strat/040

¹⁷ Cambridge and South Cambridgeshire Local Plans Sustainability Appraisal Addendum Report, RD/MC/020

¹⁸ National Planning Policy Framework (RD/NP/010)

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Main Modifications Proposed to the Cambridge Local Plan in respect of the Development Strategy

- 4.31. **Joint Housing Trajectory** – A main modification to the Cambridge Local Plan was proposed to reflect the earlier Memorandum of Understanding between the Councils (September 2014) for a joint housing trajectory for the Greater Cambridge area: (Main Modification PM/CC/2/G to Policy 3: Spatial strategy for the location of residential development).
- 4.32. **Cambridge East - North of Cherry Hinton** - Modifications to policy 12 and supporting text and maps were proposed at Cambridge East - North of Cherry Hinton - to carry forward more of the current allocation contained in the Cambridge East Area Action Plan 2008 than included in the submitted Local Plans. This reflects a better understanding from the two promoters of the land that can come forward with the Airport remaining – 1,200 dwellings are proposed, of which 780 dwellings are in Cambridge. This also reduces the amount of safeguarded land:

(Main Modification PM/CC/3/A to Policy 12: Cambridge East);

(Main Modification PM/CC/B/A to Site R40); and

(Main Modification PM/CC/Policies Map/A)

Main Modifications Proposed to the South Cambridgeshire Local Plan in respect of the Development Strategy

- 4.33. **Joint Housing Trajectory** - A main modification was proposed to reflect the earlier Memorandum of Understanding between the Councils (September 2014) for a joint housing trajectory for the Greater Cambridge area recognising the inter-relationship between the areas and phasing of delivery of housing:

(Main Modification PM/SC/2/R in relation to Policy S/12: Phasing Delivery and Monitoring).

- 4.34. **Flexibility in the start date of delivery at new settlements** -

Main modifications were proposed to provide flexibility in the start date of delivery at new settlements so that development can come forward on strategic allocations more swiftly, specifically at Waterbeach and Bourn Airfield:

(Main Modification PM/SC/2/N in relation to Policy S/6: the Development Strategy to 2031);

(Main Modification PM/SC/3/H in relation to Policy SS/5: Waterbeach New Town); and

(Main Modification PM/SC/3/I in relation to Policy SS/6: New Village at Bourn Airfield).

- 4.35. **Cambridge East - North of Cherry Hinton** - Modifications to Policy SS/3 and supporting text and maps were proposed at Cambridge East - North of Cherry Hinton - to carry forward more of the current allocation contained in the Cambridge East Area Action Plan 2008 than included in the submitted Local Plans. This reflects a better understanding from the two promoters about the land that can come forward with the Airport remaining – 1,200 dwellings are proposed, of which 420 dwellings are in South Cambridgeshire. This also reduces the amount of safeguarded land:
(Main Modification PM/SC/3/A to Policy SS/3: Cambridge East and Policies Map).
- 4.36. **Provisional extension to Cambridge Biomedical Campus** - A provisional modification proposed an extension to Cambridge Biomedical Campus, to reflect latest independent Green Belt assessment, subject to further investigation of surface water flooding issues:
(Provisional Main Modification PM/SC/8/A).
- 4.37. **Land adjacent to Peterhouse Technology Park, Fulbourn Road** - Reduction in the size of the employment site adjacent to Peterhouse Technology Park, Fulbourn Road, Cambridge, was proposed to reflect latest independent Green Belt assessment:
(Main Modification PM/SC/8/C relating to Policy E/2: Fulbourn Road East).
- 4.38. **Parish Council-led housing proposals** - Modifications were proposed to allocate small scale Parish Council-led housing sites to meet identified local housing needs; three sites at Great and Little Abington and one at Graveley. These sites were put forward to South Cambridgeshire District Council by the Parish Councils and were submitted by the District Council alongside the Local Plan.
- 4.39. They had not previously been subject to a district-wide consultation undertaken by the District Council:
(Main Modification PM/SC/7/A for three sites at Great Abington and at Little Abington); and
(Main Modification PM/SC/7/B for a site at Graveley).

Summary of Consultation Responses and Councils' Assessment

Development Strategy

4.40. As set out above, there are a number of considerations as part of responding to the issues raised by the Inspectors on the overall development strategy. They are dealt with in turn below before reaching a conclusion on the proposed modifications to the overall development strategy.

Green Belt

4.41. A number of representations relating to Green Belt and the Councils' Inner Green Belt Study 2015 (RD/MC/030) were received. The main issues are outlined below:

- Use of national and local Green Belt purposes selectively
- Criticism of the 16 Green Belt qualities
- Green Belt study does not meet para 84 & 85 of NPPF
- No assessment of safeguarding land (for beyond plan period)
- Contrary to PAS Green Belt advice issued in 2014
- Green Belt treated as an overarching constraint
- Criticism of a lack of a scoring system
- Criticism of sector choices and land parcels, and character areas (connective, supportive, definitive)
- Lack of assessment of village sites
- Failure of Councils to correctly interpret their own new Green Belt study
- Failure to consider links between the councils two Green Belt studies
- Dislike of LDA approach to commenting on other studies
- Detailed site by site comments by individual objectors (a number have commissioned their own further evidence).

Councils' Assessment

4.42. The Cambridge Inner Green Belt Boundary Study 2015 provides a robust and technically sound evidence base to inform plan making.

4.43. The 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.

- 4.44. The Study appropriately uses Cambridge-specific Green Belt purposes, previously endorsed by the Cambridgeshire and Peterborough Structure Plan (2003). These 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. The Study uses 16 qualities (described fully in section 5.2 of the Study) to consider impacts. Each of the qualities is clearly founded in Green Belt purposes. Each of them 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.
- 4.45. Green Belt has not been treated as an overarching constraint in plan making. The Councils have tested Green Belt development equally with non-Green Belt development through the Sustainability Appraisal process. They have considered a wide range of evidence, and documented their consideration of the consequences for sustainable development of different approaches to Green Belt development the Development Strategy Update (RD/MC/060).
- 4.46. 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. Scoring according to number of purposes affected would be a flawed approach.
- 4.47. The main criticism raised by objectors in relation to land parcels relates to the size of sub-areas used for the assessment. Dividing into fine grain parcels and looking in isolation 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.
- 4.48. Within the Inner Green Belt study area, edge of village sites were considered as part of the relevant sector or sub area in which they are located. Other village sites are addressed elsewhere in the South Cambridgeshire District Council SHLAA, and the Sustainability Appraisal.
- 4.49. The Inner Green Belt Study does not specifically address NPPF paragraphs 84 and 85, which set out how Local Planning Authorities should address Green Belt in plan making. Its purpose is to assess the significance of land to Green Belt purposes to inform decision making. The Councils' Inner Green

Belt Study and its findings are considered alongside other evidence and technical reports to reach conclusions on the appropriate development strategy (see Part 3 of the Councils' Development Strategy Update (RD/MC/060)).

- 4.50. The Councils have identified sufficient land to meet development needs identified in the plan period, and some sites beyond the plan period. Apart from some small scale non-strategic sites proposed for release in the current Local Plans, all of the major sites that could be developed without significant harm to Green Belt purposes in the foreseeable future have already been released for development. 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. Removing land from the Green Belt and safeguarding it for future development would not be consistent with the Councils' position, which 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.

Update to the evidence base

- 4.51. Detailed site-specific objections included criticism of the findings and methodology of the LDA Design Study and of the Councils' interpretation of the Study. Whilst the objections have not led to any changes in allocations as a result of assessment by the Councils and their consultants, LDA Design have provided an addendum to their study to provide clarification on a number of points.

Infrastructure requirements, viability and sustainable transport options for new settlements

- 4.52. A number of representations relating to infrastructure delivery, viability and sustainable transport options and the Councils' further work were received.

Infrastructure Delivery

- 4.53. The main issues received relating to infrastructure delivery, and the Infrastructure Delivery Study 2015 (IDS 2015) (RD/MC/080), are outlined below:

- Lack of certainty over funding to support delivery of the new settlements
- Lack of evidence regarding costs and timing of infrastructure delivery, particularly regarding transport infrastructure on the A428 and A10 corridors
- The latest transport evidence has not informed the IDS
- IDS does not provide objective assessment of competing strategies
- Delivering new settlements at the same time could present infrastructure delivery challenges
- Northstowe phase 3 is not addressed in the IDS.

Councils' Assessment

- 4.54. 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.
- 4.55. The IDS 2015 considers the delivery of transport infrastructure to support growth. 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. 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. A position statement was agreed by the City Deal Board on 3 March 2016¹⁹. This set out the role of the City Deal in supporting the delivery of the development strategy contained in the Local Plans, and the commitment of partners to support the delivery of major developments identified in the Local Plans.
- 4.56. The City Deal Scheme for the A428 corridor, prioritised for tranche 1, is progressing, with consultation on options completed in late 2015. Work is now also underway on an A10(N) Corridor study. 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

¹⁹ Report to City Deal Board 3 March 2016
http://www.gccitydeal.co.uk/citydeal/download/downloads/id/180/executive_board_report.pdf

deliverability of transport schemes on the A10 and A428 corridors²⁰. This evidence has confirmed that there are no overriding constraints that would prevent the transport interventions being delivered.

- 4.57. 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.

Update to the evidence base

- 4.58. The position statement agreed by the City Deal Board on 3 March 2016 (RD/MC/110), confirms its commitment to deliver its infrastructure programme for the benefit of existing and future residents including supporting and securing development identified in the Local Plans through the delivery of key infrastructure schemes.
- 4.59. Additional evidence base documents have also been prepared to provide evidence of the deliverability of transport schemes on the A10 and A428 corridors to serve the major new developments proposed in the development strategy.
- 4.60. 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.

Viability

²⁰ A10(N) Corridor Constraints Study (RD/MC/074) Mott MacDonald (2016); A428 Corridor Constraints Report (RD/MC/073) Atkins (2016)

4.61. The main issues received relating to viability, and the Cambridge and South Cambridgeshire Local Plans Viability Update 2015 (RD/MC/090), are outlined below:

- Recent new settlement development shows that they cannot achieve 40% affordable housing
- Broad-brush scale of assessment in the Councils evidence does not adequately test individual sites

Councils' Assessment

4.62. The Councils have appropriately considered viability issues, during the plan making process and specifically to consider the impacts of the proposed modifications. The Viability Update 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. Some technical points have been raised, which are addressed in the response to representations schedule. 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.

Update to the evidence base

4.63. None.

Transport (Evidence base)

- 4.64. The main issues received relating to transport, and the Local Plans CSRM – Cambridge and South Cambridgeshire Local Plans Transport Report (RD/MC/070) are outlined below:
- New evidence base is not transparent
 - Phase 2 modelling does not provide comparative testing
 - Model still shows severe transport impacts
 - The Councils have adversely affected proposals of CEG and others by the scale and nature of mitigation they have identified as part of the modelling work. Modelling groups together sites unjustifiably.
 - Mismatch between scheme benefits modelled, and those identified in recent City Deal consultations in respect of the A428 corridor.
 - Transport report contains contradictory statements

Councils' Assessment

- 4.65. 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.
- 4.66. 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 so as to better understand the transport implications.
- 4.67. 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.
- 4.68. 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).

- 4.69. The development strategy supported by the Transport Strategy for Cambridge and South Cambridgeshire (RD/T/095) 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.
- 4.70. The modelling of alternative strategies was undertaken appropriately. Following the runs without mitigation, the Local Highways Authority advised, in consultation with the Transport consultants, the likely indicative necessary transport mitigation measures for the developments proposed. These were then included in further model 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 processes but the assumptions made are considered wholly reasonable for the purposes of modelling and plan-making at this stage.

Update to the evidence base

- 4.71. Minor updates to table B.2 in the Transport Report, to clarify transport measures applied some of the model runs.

Overall Development Strategy

- 4.72. A number of representations relating to overall development strategy and the Councils' further work were received. The main issues are outlined below:
- Support for the development strategy, and continued protection of the Green Belt
 - Objection to reliance on new settlements in preference to development at villages, or on the edge of Cambridge

- Not enough account taken of benefits of edge of Cambridge development, too much weight given to Green Belt
- Concern regarding funding, deliverability and timing of new infrastructure to support new settlements
- Strategy does not take enough account of achieving sustainable transport
- Development of Bourn Airfield is not sustainable
- Waterbeach New Town should only occur after development has taken place in more sustainable locations
- If larger Cambourne West planning application is granted there is no need for Bourn Airfield.

Councils' Assessment

- 4.73. Whilst there remains general support for the development sequence in the Cambridge area, some representors consider the balance of development in the Local Plans is wrong, and should either identify more development on the edge of Cambridge, or in villages, instead of new settlements.
- 4.74. The Councils have considered the relative merits of development at each stage of the sequence. The Development Strategy Update (RD/MC/060), informed by evidence including the Joint Sustainability Appraisal Addendum (RD/MC/020), 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. This includes considering the sustainability impacts of developing outside the Green Belt compared with removing land from the Green Belt for development.
- 4.75. 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.
- 4.76. Responding to a representation, additional modifications are proposed to include the existing Newbury Farm buildings on Babraham Road within allocation GB2 in the Cambridge Local Plan. This is entirely consistent with LDA Design's parameters for a Green Belt release in sub area 11.2 of the Inner Green Belt Study. An appraisal of this change has been considered through the Sustainability Appraisal, and it resulted in no changes to the assessment results (see Supplement to the Sustainability Appraisal Addendum - November 2015 (March 2016) (RD/MC/021)).

- 4.77. The Councils have considered transport issues alongside wider planning issues throughout the plan making process. The Transport Report 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.
- 4.78. 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.
- 4.79. A strategy focusing more development at villages would not enable focused delivery of transport and other infrastructure. A wide range of sites were tested through the plan making 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 strategy supports some growth at better served villages, though identified allocations where it will support early delivery of sites. Further allocations are not proposed.
- 4.80. 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.

Update to the evidence base

4.81. None.

Approach to Proposed Modifications

Submit the following proposed modifications the Examination Inspectors unchanged:

PM/CC/2/A, PM/CC/2/D, PM/CC/2/F, PM/CC/2/G, PM/CC/2/H, PM/CC/2/j
PM/CC/2/K, PM/CC/2/L, PM/CC/2/M, MM/CC/2/A.
PM/SC/2/D, PM/SC/2/M, PM/SC/2/N

Submit proposed modifications PM/SC/2/C and PM/CC/2/E to the Examination Inspectors, but with additional wording below (highlighted in **bold underline**) (SCLP para 2.17 3rd bullet, CCLP after para 2.20)

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. **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.**

Amend Modification PM/CC/2/A:

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).

Proposed Modification PM/CC/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.

Proposed Modification PM/CC/Policies Map/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.

Sustainability Appraisal

4.82. A number of representations relating to the Sustainability Appraisal Addendum (SAA) (RD/MC/020) and the Councils' further work were received. The main issues are outlined below:

- Natural England and Historic England endorse approach to SA.
- SAA relies on the Councils' other evidence base documents which are flawed
- Should have used more quantitative data
- Every policy in both plans should be jointly assessed using the new joint SA framework
- Site packages considered were set up to favour packages without edge of Cambridge Green Belt sites. Packages do not identify specific edge of Cambridge sites, or site North of Cambourne
- SAA seeks to justify the existing strategy
- Plans don't achieve the 'right balance' across the development hierarchy
- Unjustified weighting of Green Belt compared to other sustainability issues
- SAA fails to sufficiently recognise the benefits of village growth
- Detailed criticisms of individual site criteria scores
- Site by site queries regarding potential mitigation measures

Councils' Assessment

- 4.83. The SAA provides an appropriate addition to the sustainability appraisal process for both Councils to address the concerns expressed in the Inspectors Letter.
- 4.84. The SAA supplements the Sustainability Appraisal Reports that accompanied the submitted Local Plans, and includes clear guidance on the relationship with previous stages.
- 4.85. The 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 methodology has been clearly set out in the SAA, and meets the requirements of the SEA regulations. The Statutory Consultees who responded were satisfied with the work that had been done.
- 4.86. The SAA devised a joint sustainability framework that has been used to assess issues that are of joint issues of strategic importance. It is not necessary to use this framework to assess individual policies as these policies will not be applied jointly.
- 4.87. It was entirely appropriate for the Sustainability Appraisal consultants to draw on the supporting studies that had been commissioned to support the Local Plans prepared by specialist consultants.
- 4.88. A number of representors comment on specific appraisal results on specific sustainability objectives. These have been reviewed, by the SA consultants, and responses provided in the schedule.
- 4.89. The SAA sets out reasons for the Councils' preferred approach, and the range of issues considered. This includes how the issue of Green Belt was considered. The Sustainability Appraisal process has been undertaken appropriately.

Update to the evidence base

- 4.90. The SAA Annex 1 included appraisals of individual sites. A number of representors question specific site scores on a range of criteria and the potential for mitigation measures. These have been reviewed, and a small

number of changes are proposed in response. These do not impact on the overall findings of the appraisal.

- 4.91. Some representors have also submitted amendments to sites, and in some cases entirely new sites. For completeness, these have been subject to assessment, and will be added to Annex 1 of the SAA.

Approach to Proposed Modifications

No Change. Submit proposed modification (PM/CC/2/D, MM/SC/2/A) to the Examination Inspectors.

Update the Joint Sustainability Appraisal, as described above, and submit to the Examination Inspectors. Supplement to the Sustainability Appraisal Addendum - November 2015 (March 2016) (RD/MC/021)

Joint Housing Trajectory

- 4.92. A number of representations relating to the Joint Housing Trajectory were received. The main issues are outlined below:

- Joint trajectory not appropriate in principle or to be introduced at this stage in plan making
- Higher objectively assessed needs than councils have identified means you need more housing supply
- Not consistent with National Planning Policy Framework of Planning Practice Guidance
- Will not boost Housing land Supply

Councils' Assessment

- 4.93. The Councils are firmly of the view that the Memorandum of Understanding is soundly based and consistent with national policy. 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. 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. 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.

Update to the evidence base

4.94. None.

Approach to Proposed Modifications

No Change. Submit proposed modification (PM/CC/2/C, PM/CC/2/F, PM/CC/2/G, PM/CC/2/H, PM/CC/2/J, PM/CC/2/K, PM/CC/2/L, PM/CC/2/M, PM/SC/2/B, PM/SC/2/F, PM/SC/2/R, PM/SC/2/V) to the Examination Inspectors.

Submit proposed modifications PM/SC/2/E and SC/CC/2/I to the Examination Inspectors with the following further change: The proposed modification to the total for Cambridge Urban Area should read 6,828 not 6,282.

Flexibility in the Start Date of Delivery at New Settlements

4.95. A number of representations relating to the proposed modifications which provide flexibility in the start date of delivery at new settlements, at Waterbeach and Bourn Airfield, were received. The main issues are outlined below:

- Removal of restrictions welcomed by promoters of new settlements, and confirm they can start sooner than originally anticipated in the Local Plan
- Over reliance on new settlements to achieve delivery
- Concern over whether infrastructure will be available to support early delivery
- Questions over how many dwellings per year can be achieved, and whether trajectory is realistic
- Potential impacts on delivery of Northstowe, as delivering three new settlements at the same time
- Requirements for Area Action Plans should be removed

Councils' Assessment

- 4.96. 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 considers it appropriate to delete the delivery limitations for the two new settlements to allow flexibility for the new settlements to come forward earlier.
- 4.97. Infrastructure can be delivered to support the growth (addressed in the infrastructure section of this report). The predicted lead in times and annual completions rates applied in the trajectory 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.
- 4.98. The Council's preferred approach is to see sites secured through the Local Plan process and then prepare an Area Action Plans (AAP) to inform any subsequent outline applications. However, it is acknowledged that the promoters are preparing a Development Framework Document to support planning applications, 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.

Update to the evidence base

- 4.99. None.

Approach to Proposed Modifications

No Change. Submit proposed modifications (PM/SC/2/Q, PM/SC/2/R, PM/SC/2/S, PM/SC/2/T, PM/SC/2/U, PM/SC/3/H and PM/SC/3/I) to the Examination Inspectors.

Site Allocation – North of Cherry Hinton

- 4.100. A number of representations relating to the proposed modifications to increase the size of the allocation North of Cherry Hinton were received. The

main issues are outlined below:

- The latest transport and infrastructure studies do not support the chosen locations for housing development, including Land North of Cherry Hinton and do not provide any evidence that this scheme will not directly be dependent on the Newmarket to Cambridge transport corridor.
- 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.
- Some supporters of this site suggest it means that GB1 and GB2 no longer need to be removed from the Green Belt.
- There is some questioning of detailed policy wording by the site promoters.
- CPRE argues that the land not to be allocated in this plan is not deliverable and so should be returned to the Green Belt.
- There is concern expressed about the green separation between the development and Teversham.

Councils' Assessment

4.101. 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 of being developed while the airport remains in operation.

4.102. In terms of transport, the evidence shows that transport impacts can be acceptably mitigated and there will not be an unacceptable impact on Teversham or Newmarket Road (or elsewhere). A detailed Transport Assessment will need to be submitted as part of any planning application.

4.103. GB1 and GB2 are required to provide flexibility to ensure the Cambridge City Council can meet its Objectively Assessed Need. The detailed site wording is necessary to ensure the development can be built acceptably.

4.104. The green separation between the development and Teversham will not be less than that agreed in the Cambridge East Area Action Plan.

Approach to Proposed Modifications

Submit (all) proposed modifications relating to North of Cherry Hinton (Cambridge: PM/CC/3/A, PM/CC/3/B, PM/CC/3/C, PM/CC/3/D, PM/CC/3/E, PM/CC/B/A, PM/CC/Policies Map/A, MM/CC/3/A,, South Cambs: PM/SC/3/A, PM/SC/3/B, PM/SC/3/C, PM/SC/3/D, PM/SC/3/E, PM/SC/3/G and part of PM/SC/2/O) to the Inspectors unchanged.

Site Allocation - Land South of Cambridge Biomedical Campus

4.105. A number of representations relating to the provisional extension to the Cambridge Biomedical Campus were received. The main issues are outlined below:

- The proposed allocation is supported by Cambridge University and other life science stakeholders to allow for the expansion of the CBC which is identified as an international centre of excellence.
- Cambridge PPF and the CPRE do not object to its allocation.
- Natural England, Cambridge PPF and the Wildlife Trust object to the omission of biodiversity and ecology criteria from the policy and advocate development should achieve no net loss of biodiversity and ideally a net gain through masterplanning and mitigation measures.
- Objections to the allocation include a petition with 435 signatories express concern about its impacts on Nine Wells, flood risks, possible impacts on water quality and flow, bridleways, traffic, biodiversity impacts and loss of Green Belt.

Councils' Assessment

4.106. The development of the site would contribute to the success of life science research at the Cambridge Biomedical Campus but objections concern impacts on flood risks and groundwater hydrology, biodiversity, setting of and impact on Nine Wells LNR, Green Belt and transport. This site has come forward late in the plan making process following the publication of a new Inner Green Belt Boundary Study in November 2015, and apart from Green Belt, the evidence base does not yet fully address all the points of concern expressed in representations.

4.107. 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 and to address some of the other issues raised in representations including bridleways, footfall impacts, and mitigating the impact of built form on Nine Wells.

Update to the evidence base

4.108. It is recommended that a decision on this provisional allocation be deferred to allow time for additional evidence to be gathered which will form a part of the Local Plan evidence base on completion.

Approach to Proposed Modifications

Defer decision making on the proposed modification PM/SC/8/A (and related modifications PM/SC/2/P, PM/SC/3/F, PM/SC/8/B, and part of PM/SC/2/O, and PM/SC/2/G) 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.

Site Allocation – Land adjacent to Peterhouse Technology Park, Fulbourn Road

4.109. A number of representations relating to reducing the area of the employment allocation South of Fulbourn Road were received. The main issues are outlined below:

- A majority of representations support the revised allocation.
- Objections include that the existing proposed boundary should be retained as it follows existing physical boundaries, another proposes that the site be safeguarded for future development rather than being allocated.

Councils' Assessment

4.110. 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. Development can create a clear defensible boundary, and appropriately reflects the findings of the Inner Green Belt Study 2015.

Update to the evidence base

4.111. None.

Approach to Proposed Modifications

Submit proposed modification (PM/SC/8/C, and part of PM/SC/2/O) to the Examination Inspectors.

Parish Council-led housing proposals

Site Allocations at Great and Little Abington

4.112. A number of representations relating to the proposed allocations at Great and Little Abington. The main issues are outlined below:

- Most responses are in support of the proposals which will help meet local housing aspirations including for families, downsizing and affordable housing.
- The proposals have the support of 75% of the local community as expressed in a local consultation.
- Concerns include that that the indicative dwelling numbers are too high or too low, and that the Bancroft Farm site should not encroach onto the meadow to the rear of the site.
- Other sites in villages could benefit from similar development.

Councils' Assessment

4.113. It is right that the Local Plan should seek to facilitate locally lead development proposals under the spirit of localism to meet local housing aspirations. Other village sites cannot demonstrate similar local support. The number of homes on the sites is not fixed by policy H/1 but will be determined by a design led approach. Agree that the Bancroft Farm site should not encroach onto the meadow at the rear which is a Protected Village Amenity Area in adopted plans and is proposed as a Local Green Space in this plan.

Update to the evidence base

4.114. None

Approach to Proposed Modifications

No Change. Submit proposed modification (PM/SC/7/A) to the Examination Inspectors.

Site Allocation at Graveley

4.115. A number of representations relating to the proposed allocation at Graveley.

The main issues are outlined below:

- The proposed allocation has local support.
- There are no in-principle objections to the allocation of this site beyond statements that other Group and Infill villages could also benefit from similar development.

Councils' Assessment

4.116. There are no in-principle objections to the proposed allocation of this site.

Update to the evidence base

4.117. None.

Approach to Proposed Modifications

No Change. Submit proposed modification (PM/SC/7/B) to the Examination Inspectors.

5. Conformity with revisions to National Planning Policy

Issues raised by the Inspectors

- 5.1. Since the submission of the Cambridge and South Cambridgeshire Local Plans, the Government has published a number of Written Ministerial Statements, which may affect the policies contained within the Cambridge and South Cambridgeshire Local Plans.
- 5.2. In their letter of May 2015, the Inspectors examining the Local Plans asked the Councils to consider the Written Ministerial Statements and propose any necessary modifications to the Local Plans to ensure compliance.

Councils' Response

- 5.3. The Councils have undertaken the work identified by the Inspectors and also taken the opportunity to consider a number of other recent changes in national policy and guidance up to November 2015. As a result, an audit of these policies was undertaken by the Councils, which is set out in the document Proposed Modifications arising from the Government's Written Ministerial Statements²¹. Where appropriate, modifications to policies were put forward and appraised as part of the further work on the Sustainability Appraisal and the Viability Update. Modifications were set out in Proposed Modifications arising from the Government's Written Ministerial Statements.
- 5.4. The policies amended by the changes in national planning policy and guidance include those addressing sustainable design and construction, gypsies and travellers, affordable housing and residential space standards. There may also be an impact on policies in both Plans relating to the Government's introduction of accessibility standards through part M of Building Regulations. The Councils considered that further work needs to be undertaken in respect of accessibility. As such, no main modifications were proposed in respect of accessibility standards as part of the Proposed Modifications consultation.

²¹ Proposed Modifications arising from the Government's Written Ministerial Statements, RD/MC/100

- 5.5. The implications of the Written Ministerial Statement amendments were considered in the Sustainability Appraisal Addendum. Some of the previous findings of the Appraisal were revised, notably in Cambridge where removal of policies related to the Code for Sustainable Homes and carbon reduction from new housing mean that the plan will no longer have significant positive effects in relation to climate change, although positive effects are still expected as a result of other policies in the Cambridge Local Plan.
- 5.6. The key modifications arising from this work are summarised below. Please see the full schedules of modifications in Appendices A – D of the Joint Consultation Report December 2015 (RD/MC/010).

Main Modifications Proposed to the Cambridge Local Plan in respect of the Written Ministerial Statements

- 5.8. **Climate Change policies** - Main modifications were proposed in relation to renewable and low carbon energy generation and sustainable design and construction in the context of the Written Ministerial Statements:
- (Main Modification PM/CC/4/A for Policy 27: Carbon reduction, community energy networks, sustainable and design and construction, and water use);
- (Main Modification PM/CC/4/H for Policy 28: Allowable solutions for zero carbon development); and
- (Main Modification PM/CC/4/I for Policy 29: Renewable and low carbon energy generation).
- 5.9. **Housing Policies** - The Council also proposed main modifications to address the Government's policy changes in relation to starter homes and the introduction of the Optional Technical Standard for residential space:
- (Main Modification PM/CC/6/A for Policy 45: Affordable housing and dwelling mix); and
- (Main Modification PM/CC/6/D for Policy 50: Residential space standards).

Main Modifications Proposed to the South Cambridgeshire Local Plan in respect of the Written Ministerial Statements

- 5.10. **Climate Change policies** - Changes were proposed to policies relating to climate change, specifically in relation to water efficiency, renewable energy, the way in which the sustainability credentials of new homes will be judged. This is in the light of amendments to national government policy:

(Main Modification PM/SC/4/B in relation to Policy CC/2: Renewable and low carbon energy generation (criterion 1) ;

(Main Modification PM/SC/4/C in relation to Policy CC/2: Renewable and low carbon energy generation (criterion 1a) ;

(Main Modification PM/SC/4/D in relation to Policy CC/2: Renewable and low carbon energy generation (criterion 2)); and

(Main Modification PM/SC/4/E relating to Policy CC/4: Sustainable Design and Construction).

- 5.11 **Fen Drayton Land Settlement Association site** – Change to explain the policy requirements for new development taking account of the withdrawal of the Code for Sustainable Homes:

(Main Modification PM/SC/7/C relating to Policy H/4 Fen Drayton Former Land Settlement Association Estate).

- 5.12 Changes are proposed to housing policies in the plan to make provision for starter homes and self build to reflect changes in national government policy:

(Main Modification PM/SC/7/F in relation to Policy H/8: Housing Mix, criterion 1).

(Main Modification PM/SC/7/G relating to Policy H/8: Housing Mix, criterion 2).

Cambridge Climate Change Policies

- 5.13. A number of representations relating to proposed modifications relating to renewable and low carbon energy generation, and sustainable design and construction. The main issues are outlined below:
- General support for the proposed modifications related to Written Ministerial Statements;
 - Concern that the proposed levels of water efficiency do not go far enough given the level of water stress facing the city and surrounding area;
 - Concern about impacts of revised wording related to bespoke sustainability assessment frameworks on listed buildings.
 - The wind resource is greater than in much of Northern Europe and as such sites should be allocated.

Councils' Assessment

- 5.14 Regarding the water efficiency requirements, while concerns regarding impact on levels of water stress are recognised, the council are no longer able to set more stringent levels of water efficiency as a result of the Government's Housing Standards Review.
- 5.15 Regarding the impact of the bespoke sustainability assessment frameworks on listed buildings, it was not the intention of the policy to have an impact on the integrity of listed buildings. The concerns of Historic England are noted and the council would support the inclusion of their suggested revised wording.
- 5.16 Wind resource mapping carried out as part of the Decarbonising Cambridge Study shows that the wind resource in Cambridge is not sufficient to make wind turbines technically feasible.

Update to the evidence base

- 5.17 None.

Approach to Proposed Modifications

Submit the following proposed modifications the Examination Inspectors unchanged:

PM/CC/4/B, PM/CC/4/C, PM/CC/4/D, PM/CC/4/E, Pm/CC/4/F, PM/CC/4/G, PM/CC/4/H, PM/CC4/I, PM/CC/4/J.

Amend Modification PM/CC/4/A as follows:

“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. 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.”

Cambridge Housing Policies

5.18 A number of representations relate to proposed modifications relating to starter homes, and the optional technical standard for residential space. The main issues are outlined below:

- Space standards should be applied to student accommodation;
- Vital that affordable housing is provided in the mix;
- Requirement will not assist the viability of development of brownfield sites.
- No assessment of need made, so case for using the standards has not been made;
- The impact on Starter Homes and the overall viability of development is not clear;

Councils' Assessment

5.19 The Government's national technical standard for residential space standards cannot be applied to student accommodation.

- 5.20 The council will continue to seek affordable housing on smaller sites in line with the policy to meet local need. Where a developer can show through an independently verified viability assessment that such provision would render a development unviable, a reduction in affordable housing provision would be allowed for.
- 5.21 Research on unit sizes in approved developments has been undertaken. The majority of schemes are already meeting/exceeding the proposed standard but there have also been schemes that fail the standard, hence the need for the standard.
- 5.22 The policy has been considered as part of the council's viability work, which shows that the application of the standard will not impact on the viability of development;

Update to the evidence base

- 5.23 None.

Approach to Proposed Modifications

No Change. Submit proposed modifications (PM/CC/5/A, PM/CC/6A, PM/CC/6/B, PM/CC/6/C, PM/CC/5/D) to the Examination Inspectors.

South Cambridgeshire Climate Change Policies

- 5.24 A number of representations relating to proposed modifications relating to water efficiency, renewable energy, and the way sustainability credentials of new homes will be judged at Fen Drayton LSA. The main issues are outlined below:

Sustainable Design and Construction

- Support recognition of withdrawal of the Code for Sustainable Homes and the application of the optional water efficiency standard;
- Should require energy efficiency standards above national minimum and most stringent standards of water efficiency;
- Degree of flexibility should be written into the policy;
- Does not take account of water availability and water stress in the area.

Renewable and Low Carbon Energy Generation

- Would have prevented the construction of the Gamlingay community wind turbine;
- Deferral of allocating areas to Neighbourhood Plans is effectively a moratorium against all wind energy developments;
- Support for amendment relating to protecting high quality agricultural land;
- Do not provide enough protection for high quality agricultural land and do not reflect national principles of local communities being able to influence decisions.

Sustainable Drainage Systems

- Welcome aligning with national policy and amendments to ensure SuDS take account of wildlife assets and contribute to biodiversity enhancements.

Fen Drayton Former Land Settlement Association Estate

- Support removal of the reference to the Code for Sustainable Homes.

Councils' Assessment

- 5.25 With regard to Sustainable Design and Construction, the Council intend to rely on Building Regulations to set the energy efficiency requirements of new dwellings and that it is necessary and justified to require the optional technical standard given the district is in an area of water stress and achievement of this standard can be met at a low additional cost.
- 5.26 The Council has not identified areas suitable for wind energy development in the Local Plan, and given the nature of the district it is not appropriate to identify broad locations in the Local Plan. Wind energy developments will therefore only be permitted where suitable areas have been identified in any Neighbourhood Plans – community wind turbines could still be delivered if a local community identifies a suitable site through a Neighbourhood Plan.
- 5.27 The modifications add an additional criteria to the Renewable Energy and Low Carbon Energy Generation policy relating to the protection of high quality agricultural land and it is not appropriate to require developers to demonstrate local community support for the proposed development.

Update to the evidence base

- 5.28 None.

Approach to Proposed Modifications

No Change. Submit proposed modification (PM/SC/4/A, PM/SC/4/B, PM/SC/4/C, PM/SC/4/D, PM/SC/4/E, PM/SC/4/F, PM/SC/4/G, PM/SC/4/H, PM/SC/4/I, and PM/SC/7/C, PM/SC/7/D, PM/SC/7/E) to the Examination Inspectors.

South Cambridgeshire Housing Policies

5.29 A number of representations relate to proposed modifications relating to starter homes and self build. The main issues are outlined below:

- Support policy –promotes the delivery of starter homes
- Reflects Government expectations regarding self and custom build homes
- Will help delivery of affordable and sustainable housing
- Threshold of 20 dwellings is arbitrary and excessive
- Policy is too vague
- A more flexible approach is needed
- Will not deliver enough self build opportunities
- Does not accord with Government policy
- Will not be practical in high density flatted developments

Other representations addressed related matters including village policies S/7 and S/11, residential space and access standards, private rented housing and provision for lower paid CBC staff.

Councils' Assessment

5.30 Many of the representations concern residential space and access standards which have not been subject to proposed modification. Further evidence is to be commissioned into these matters. Policy is considered to be consistent with known Government policy and the available evidence base and will result in additional self build opportunities. The policy is flexible and does not impose an arbitrary fixed percentage target for self build. Agree that the policy may not be practical for high density flatted developments, further modification proposed. The proposed modifications do not relate to policies S/7, and S/11. Strategic housing developments on the southern fringe of Cambridge will deliver 40% affordable housing close to CBC. Policy H/10 for rural exception sites already allows for market housing to help subsidise the affordable

homes. Further changes may be necessary depending on the Housing and Planning Bill changes and its consequential changes to policy and regulation.

Update to the evidence base

- 5.31 Further evidence is to be commissioned concerning residential space standards for South Cambridgeshire, and with Cambridge concerning access standards. These will support future examination hearings.

Approach to Proposed Modifications

Submit proposed modifications (PM/SC/7/F, PM/SC/7/G, PM/SC/7/H, PM/SC/7/I, PM/SC/10/A, MM/SC/G/A) to the Examination Inspectors with the following changes.

Add at end of c) in PM/SC/7/G:

Exceptionally, no provision will be expected in developments or phases of developments which comprise high density multi-storey flats and apartments.

South Cambridgeshire Other Minor Modifications

- 5.32 A number of other Minor Modifications were proposed update the glossary and supporting text of the plan to reflect changes to government guidance. No comments were received.

Approach to Proposed Modifications

No change. Submit proposed modifications (MM/SC/7/A, MM/SC/7/B, MM/SC/7/C, MM/SC/9/A, MM/SC/G/B) to the Examination Inspectors.