

APPENDIX D: DETAILED POLICY JUSTIFICATION FOR MAINTAINING A BALANCED SUPPLY OF HOUSING

Section 5: Maintaining a Balanced Supply of Housing

Meeting The Range of Housing Needs

- Policy 36: Specialist Housing

Quality of Housing

- Policy 40: Lifetime Homes and Lifetime Neighbourhoods
- Policy 41: Protecting Garden Land and the Subdivision of Existing Dwelling Plots
- Policy 42: Flat Conversions
- Policy 43: Residential Moorings

STRATEGIC VISION/OBJECTIVE:

A balanced mix of high quality housing types meeting the needs of all sections of the community will be secured at a level to meet objectively assessed need from household growth, including the maximum reasonable proportion of Affordable Housing.

Sufficient housing for Cambridge's students will be provided to avoid putting stress on housing for permanent residents.

ISSUE: SPECIALIST HOUSING

Policy:

Policy 36: Specialist Housing

Planning permission will be granted for the development of specialist housing, subject to the development being:

- i. supported by evidence of the demonstrable need for this form of development within Cambridge;
- ii. suitable for the intended occupiers in relation to the quality and type of facilities, and the provision of support and/or care;
- iii. Accessible to local shops and services, public transport and other sustainable modes of transport; and community facilities appropriate to the needs of the intended occupiers; and
- iv. In a location which avoids excessive concentration of such housing within any one street or small area.

Where the development falls within Use Class C3 (Dwellinghouses), the development will be expected to contribute to the supply of Affordable Housing within Cambridge in accordance with Policy 32. Where existing specialist housing does not meet

modern standards, its refurbishment or redevelopment will be considered favourably. If development would involve a net loss of residential floorspace, this will only be permitted, where appropriate replacement specialist housing accommodation will be made that satisfies the four criteria i - iv.

Supporting Text:

This policy relates to housing designed and designated for occupation by older people, people with disabilities, and vulnerable people with specific housing needs, referred to within the policy and hereafter as 'specialist housing'. Specialist housing can be developed with particular groups of people in mind such as older people (including the frail elderly and those with dementia), people with physical, sensory and learning disabilities, young people at risk, people with alcohol or drug dependency, those requiring refuge from harassment and violence, and others who may, for a variety of reasons, be excluded from or find it more difficult to integrate with, the local community. People with the need for specialist housing contribute to the community in many ways, but for some their ability to participate fully in society is hampered by poor or inappropriate housing, which affects their physical or mental health, or their ability to receive the support they need to live as independently as possible.

Forms of housing covered under this policy include:

- Sheltered housing;
- Residential care and nursing homes;
- Extra-care housing;
- Shared homes;
- Cluster units;
- Hostel accommodation.

This policy does not relate to student accommodation and other types of accommodation within the C2 Use Class (Residential Institutions), which is not specifically for older, disabled or vulnerable people, e.g. hospitals and boarding schools. It also does not relate to individual homes built to wheelchair accessible standards.

Specialist housing is intended to enable people to live as independently as possible, but is designed so that support can be provided to them (and often to others in the wider community) on-site. Where possible, such housing should be designed flexibly so that it can be adapted to meet alternative housing uses as needs change in the future. Such housing should be provided across the city, as opposed to being concentrated in certain areas, to help to enable people moving into such accommodation to remain in their local area and to create and maintain balanced communities. Safe and accessible high quality amenity space should be provided for specialist housing in compliance with Policy 39 on residential space standards.

In demonstrating need for specialist housing, applications should refer to the Council's Housing Strategy, Cambridgeshire County Council's Joint Strategic Needs Assessment, the Cambridgeshire Health and Wellbeing Strategy, local health and social care commissioning strategies and, where appropriate, the Extra Care Commissioning Strategy for Cambridgeshire and its successor documents. Ideally the scheme should be endorsed by the appropriate revenue funding commissioners under the newly emerging health and social care commissioning arrangements, where care and/or support funding may be required for some or all of the residents – either from the outset or for future residents.

How the Policy Came About:

1. One of the objectives in the Council's Housing Strategy is to ensure that housing meets a range of specialist needs, and supported housing, in a range of tenures, adds to the mix and range of housing to meet this objective. It is therefore important that the Local Plan accommodates the provision of housing that may be designed in a particular way or has a staff office or staff night-time facilities when staff are needed to support the people who are living in the housing. This housing can often demand a larger plot or building 'footprint' and is often termed as 'supported housing'. Such housing should be provided across the city, as opposed to being concentrated in certain areas, to help to enable people moving into such accommodation to remain in their local area and to create and maintain balanced communities.
2. Specialist housing can be developed with particular groups of people in mind such as older people (including the frail elderly and those with dementia), people with physical and sensory disabilities, those with learning difficulties or acquired brain injury, young people at risk, people with alcohol or drug dependency, those requiring refuge from harassment and violence, and others who may, for a variety of reasons, be excluded from the local community. People with the need for specialist housing contribute to the community in many ways, but for some their ability to participate fully in society is hampered by poor or inappropriate housing, which affects their physical or mental health, or their ability to receive appropriate support to enable them to live as independently as possible.
3. Specialist housing is designed so that support can be provided to them (and often to others in the wider community) to promote independent living. Examples may range from a small scheme of cluster flats with additional facilities for support staff, to much larger extra care schemes enabling older and disabled people to live in their own self-contained accommodation but with care and support on-site (Some specialist housing may not provide care or support from on-site – e.g. some forms of sheltered housing – but need to be designed in such a way that care and/or support can be brought on-site and provided in a co-ordinated way where appropriate). Where possible, such housing should be designed flexibly so that it can be adapted to meet alternative housing uses as needs change in the future.

4. Although some groups will continue to require specialist housing, this needs to be balanced with the current general direction of travel for health and social care commissioning, which includes enabling and supporting people to remain in their own homes, and being able to retain their independence there for as long as possible. This is reflected in the Cambridgeshire Supporting People Commissioning Strategy, which generally aims to reduce the amount of adult social care funded services in specialist accommodation, in favour of supporting people in their own homes where possible.

Housing Needs of Older People

5. The Joint Strategic Needs Assessment for Cambridgeshire provides some context for an understanding of the housing needs of older people in the city, although this is currently under review (due to be completed by April 2013). While the length of time people can expect to live has increased, periods of life spent in poor health or with a limiting chronic illness or disability have increased.
6. The city's population aged 65 and over has increased by 1.7% between the 2001 and 2011 Censuses – a significantly lower increase than other parts of the sub-region, with numbers in some five-year age-bands decreasing. However, there has been a 10% increase in those aged 65-69, and a 24% increase in the number of people aged 85 and over.
7. Population projections vary, but the older population is expected to increase over time (although less so for Cambridge than other parts of the housing sub-region). In the 20 years, 2010 to 2030 the number of people with dementia across Cambridgeshire as a whole is expected to double, and incidence of dementia increases with age.
8. One of the key priorities in the Health and Wellbeing Strategy for Cambridgeshire is to support older people to be independent, safe and well. The Council's Older People's Housing Strategy 2009 –2014 recognises that people who are getting older now are demanding better quality accommodation and services than previous generations. The increase in the frail-elderly population people means that we should plan accommodation specifically to meet their needs, whilst assuming that the majority of younger-older people (aged 60-65 or 70), will choose to remain in their own homes.
9. This sets the context for there to be a range of housing for older people in Cambridge that at one end of the spectrum provides accessible accommodation, which has good space standards and is located in reasonable proximity to local services and amenities, through to more traditional forms of sheltered housing for older people and Extra Care Schemes for older people who nevertheless want to stay as independent as possible. Extra Care schemes provide self-contained housing, but with other

facilities provided on-site where people can receive care and support but still retain their independence, as opposed to residential care homes where occupants do not have their own tenure or 'own front door'. There are currently four Affordable Housing Extra-Care schemes in the City, and a number of traditional sheltered housing schemes. There are also some private schemes providing care and/or support for older people, and a number of residential nursing and care homes. Detailed mapping of existing provision is available in the Cambridgeshire Older People's Joint Strategic Needs Assessment.

10. A significant issue for local health and social care commissioners is where specialist provision for older people may achieve planning approval, without reference to the demands they may place on local health and social care revenue budgets – either immediately or in the future as self-funding residents move out and new residents move in. Therefore it is important to ensure that for any new specialist housing schemes – including those for older people - the necessary health, care and support revenue funding is agreed in principle by the appropriate commissioners prior to planning permission being granted.
11. It should be noted that the City Council is not the statutory body that commissions care services for older people. This has been the County Council's responsibility with services often jointly commissioned with the health services through the Primary Care Trust. However, with new national health and social care commissioning arrangements coming into play, including the abolition of PCTs, the removal of the ring-fence around the Supporting People budgets, and new commissioning responsibilities for GPs etc, future arrangements for securing revenue funding for new schemes have not yet been clarified. Discussions with partners on this issue are underway.
12. The Cambridgeshire Extra Care Commissioning Strategy 2011 (2011 – 2015) outlines the extra care housing priorities for Cambridgeshire, (although again this is currently under review). Under this strategy, health and social care approval for development of and revenue funding for new schemes in Cambridge is currently being given lower priority than in other districts due to the shortage of provision in other parts of the county. However, this does not preclude development in the city if strategically important opportunities arise that might otherwise be missed.
13. Revenue funding for sheltered housing schemes is less of an issue, as in future, as part of the review of County Council budgets, residents will in future only receive funded support for short periods of time as required, in line with plans for support to be provided to older people in the wider community. The same applies to individual housing units which may be designated for occupation by older people.

Housing Needs of Other Vulnerable People

14. Whilst many vulnerable people with care or support needs live in general needs housing, there are some groups for whom more specialist provision is required. Current provision where support is funded by Cambridgeshire County Council includes:

- Housing with employment for offenders and people at risk of offending – 10 units (the Jubilee Project)
- Two housing schemes for people with learning disabilities (24 units)
- Four housing schemes for young people at risk (130 units)
- Two homeless hostels owned by Cambridge City Council (27 units)
- Housing for single homeless people - 206 units over 12 schemes (including 222 Victoria Road and the Assessment Centre at Jimmy's)
- Housing for teenage parents (one 7-unit scheme)
- Two hostels for people fleeing domestic violence (11 units)
- A six-unit Controlled Drinking project (451 Newmarket Road)
- Two children's homes providing 13 units.

15. Evidence of numbers of people affected by such issues as learning disability, mental health problems, homelessness, etc – i.e. of groups within which specialist housing might be a solution for some – are available in the Cambridgeshire Joint Strategic Needs Assessment. However, what is not available is a full assessment of the current and future need for specialist housing accommodation for these groups.

16. Work to date with health, care and support commissioners has identified the current need for the following in or close the city:

- A small group home providing permanent accommodation for people with profound and multiple disabilities;
- Cluster move-on accommodation for people with physical disabilities;
- Cluster flats with office accommodation for people with mental health needs;
- Cluster accommodation with a lounge and sleep-in provision for people with learning disabilities.

However, this is not comprehensive, and does not take into account needs which may arise in the future. More work is required in this area. As with housing for older people, health, care and support revenue funding needs to be in place before planning permission can be granted.

Developing a policy on specialist housing

17. The National Planning Policy Framework sets out the importance of planning for a mix of housing to meet different groups in the community. However, the location of provision needs careful consideration and should be in accordance with locally identified need. On this basis, only one reasonable option was considered appropriate for inclusion in the Issues and Options consultation in Summer 2012. This option's approach would allow for

development of a policy relating to all types of specialist housing, including extra care provision for older people, to be developed. There was support for the principle of the option. Specific reference should be made in the criteria to the need for residents of specialist housing to have good access to safe and secure open space for their health and well-being and need for such provision to be in close proximity to local services. This promotes the need for specialist housing to form part of sustainable, mixed and balanced communities. With particular reference to older people, in Cambridge, over a third of people aged 60 plus have no access to a car, and this percentage increases with age, so the need for good public transport, local amenities and welcoming neighbourhoods is significant.

18. In combination with other relevant policies within the Local Plan, when assessing the suitability for supported care housing and care homes, the following should be taken into consideration:

- The location of such provision, including the proximity of the site to public transport facilities, the provision of a safe, accessible and secure environment and the convenience of the site's location in relation to local shops, services and community facilities;
- The location of such provision in relation to other similar accommodation;
- The provision of an adequate level of amenity space which is safe and suitable;
- There is evidence of demonstrable need in accordance with the Council's Housing Strategy, the Cambridgeshire Health and Well-Being Strategy, the Cambridgeshire Joint Strategic Needs Assessment, Cambridgeshire County Council and local health commissioning strategies and, where appropriate, the Extra Care Commissioning Strategy for Cambridgeshire and its successor documents; and
- The approval of revenue funding for the necessary care and support to be provided, from appropriate health and social care commissioners under newly emerging commissioning arrangements.

This allows specific proposals to come forward in accordance with local need.

ISSUE: LIFETIME HOMES AND LIFETIME NEIGHBOURHOODS

Policy:

Policy 40: Lifetime Homes and Lifetime Neighbourhoods

In order to create Lifetime Homes and Neighbourhoods:

- i. All housing development should be of a size, configuration and internal layout to enable the Lifetime Homes Standard to be met, so far as this does

not duplicate Building Regulations requirements in the manner set out in Table 6, and

- ii. 5% of all housing schemes providing or capable of acceptably providing 20 or more self-contained homes, including conversions and student housing, should either meet Wheelchair Housing Design Standards, or be easily adapted to meet them.

Compliance with the criteria should be demonstrated in the design and access statement submitted with the planning application.

Supporting Text:

Table 6 Application of Lifetime Homes Standard

Those Lifetime Homes Standards to be applied through Planning Regulation	Covered by Building Regulations?
2. The distance from the car parking space to the home should be kept to a minimum and should be level or gently sloping.	NO – However, this part of the standard will be applied pragmatically and should not imply that all parking should be located next to dwellings. Parking in areas within a short distance (300m) of a home across routes meeting the Part M 1.3.1.1E standard is acceptable.
6. The width of the doorways and hallways should conform to the specifications in the next column.	PART – Small additional requirement in Lifetime Homes Standard regarding front door clearance.
7. There should be space for turning a wheelchair in dining areas and living rooms and adequate circulation space for wheelchair users elsewhere.	NO
8. The living room should be at entrance level.	NO – Will be interpreted that the main ground floor room can easily be adapted for use as a living room.
9. In houses of two or more storeys, there should be space on the entrance level that could be used as a convenient bed space.	NO – This room can be the same as the room for Standard 7 providing Standard 8 and minimum room size standards are met.
10. There should be: a) a wheelchair accessible entrance level WC, with b) drainage provision enabling a shower to be fitted in the future.	PARTIALLY – The additional Lifetime Homes standard is to allow adaptation to fit a shower in the future. There is currently no Lifetime Homes guidance on circulation space in kitchens. Kitchens should be a key accessible facility at entrance level. Future adaptability to provide for improved access to the WC is acceptable (rather

	than requiring a full side transfer space from the outset).
11. Walls in bathrooms and toilets should be capable of taking adaptations such as handrails	NO
12. The design should incorporate: a) provision for a future stair lift b) a suitably identified space for a through the floor lift from the ground to the first floor, for example to a bedroom next to a bathroom	NO - There is no requirement in the Lifetime Homes standard itself for two or three storey blocks of flats to be served by a lift. However, without a lift homes above the ground floor are not visitable by wheelchair users and without the facility to install a lift at a later stage those homes are not adaptable either. Hence a lift should be installed where a core serves 8 or more homes, and in all cases space should be provided for future fitting (as provided for in the BSI Draft for Development Code of Practice (DD266:2007).
13. The design should provide for a reasonable route for a potential hoist from a main bedroom to the bathroom	NO – Note there is a need for point tracking only in bathroom and bedroom – rather than a full tracking route – and the ability to retro-fit for point loading will reduce the necessary initial works.
14. The bathroom should be designed to incorporate ease of access to the bath, WC and wash basin	NO
15. Living room window glazing should begin at 800mm or lower and windows should be easy to open/ operate	NO

Note: The plan’s interpretation of the Lifetime Homes standard includes recommendations put forward by the Technical Forum to DCLG.¹ Any criteria not covered within Table 6 are considered to be addressed appropriately via Building Regulations.

This plan throughout adopts the principle of inclusive design: “The design of mainstream products and/or services that are accessible to, and usable by, as many people as reasonably possible ... without the need for special adaptation or specialised design.” (BSI 2005).² This principle applied to housing has resulted in the concept of Lifetime Homes and indeed goes wider to the concept of ‘lifetime neighbourhoods’ which enables an increasingly aging society to get out and about in the areas in which they live – both physically and virtually – and connect with other people and services in the immediate neighbourhood and beyond.

¹ Habinteg Housing Association (2012) Lifetime Homes technical forum. This can be accessed at http://www.housinglin.org.uk/Topics/browse/Design_building/LifetimeHomes/Standards/?parent=8576&child=8564

² BSI (2005), Managing inclusive design.

A Lifetime Home supports changing needs of residents from raising children through to mobility issues faced in old age or through disability. This essentially allows people to live in their home for as much of their life as possible. Such homes have design features that have been tailored to foster accessible living, helping to accommodate old age, injury, disability, pregnancy and pushchairs or enable future adaptation to accommodate this diversity of use. Lifetime Homes was pioneered by the Joseph Rowntree Foundation/Habinteg and the Government has incorporated much of the standard into revisions to Part M of the Building Regulations and seven studies commissioned by the Government³ have confirmed the practicality and affordability of the standard being applied in full, providing it is applied pragmatically with regard to high density and car free settings. Table 6 above sets out how the aspects of the standard that are not addressed by building regulations requirements will be applied.

The standards for Lifetime Homes and wheelchair accessibility relate primarily to the layout of self-contained homes for permanent occupancy. As occupants of student housing will only stay for a limited period, student housing is not expected to meet Lifetime Homes standards. However, 5% of student flats or study-bedrooms (together with supporting communal spaces) should be built to meet the needs of disabled people. Within the required percentage, half of the units should be designed and built out for wheelchair users and at least 1 unit should be delivered in accordance with the guidance in BS8300⁴ (2009) concerning access for carers (i.e. adjoining room with a through door). Of the other half, these should show specific adaptation to meet the needs of other disabled people, either with sensory impairments, whether sight, hearing or both, autism, being of certain statures etc.

Lifetime Homes standards will be applied to all developments of self-contained housing, including flat conversions, where reasonable and practical. It is acknowledged that the design or nature of some existing properties and proposed development sites means that it will not be possible to meet every element of the Lifetime Homes standard, for example in listed buildings or on very constrained urban sites, but it is considered that each scheme should achieve as many features as possible having regard to Table 6.

Where proposals involve re-use of an existing building (particularly a listed building), the wheelchair percentage will be applied flexibly taking into account any constraints that limit adaptation to provide entrances and circulation spaces that sufficiently level and wide for a wheelchair user.

How the Policy Came About:

19. The National Planning Policy Framework (paragraph 50) sets out the need to deliver a wide choice of high quality homes, widen opportunities for home

³ A number of studies can be accessed at Housing LIN: Lifetime Housing Standards research findings at http://www.housinglin.org.uk/Topics/browse/Design_building/LifetimeHomes/Standards/?parent=8576&child=8564

⁴ BSI (2009) BS 8300:2009 Design of buildings and their approaches to meet the needs of disabled people.

ownership and create sustainable, inclusive and mixed communities. In order to do this, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people wishing to build their own homes).

20. Current Building Regulations (Part M as amended) requires new developments to have a minimum standard of accessibility to and into the entrance level of a building. However, these minimum statutory standards provide only limited usability within the home for a disabled person. The level entrance should be the principal entrance from the major highway leading to the house and that this level of the building must contain reception room(s).

Lifetime Homes

21. The Lifetime Homes Standard (November 2011) is a widely used national standard, which uses technical advice to ensure that the spaces and features in and around new homes can readily meet the needs of most people, including those with reduced mobility. The website www.lifetimehomes.org.uk states that lifetime homes are *“ordinary homes incorporating 16 design criteria that can be universally applied to new homes at minimal cost. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life.”* The premise is that homes meeting the standard represent flexibility and adaptability. Having homes built to the sixteen points of the Lifetime Homes Standard helps to ensure that housing suits householders’ needs and changing circumstances. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life.
22. At present, Local Authorities and Health Authorities bear the cost of adapting housing and re-housing people who become disabled. This budget is unlikely to expand and will encounter more demand with an aging population and people living longer with profound disabilities and illnesses. Lifetime Home provision will help reduce future costs and will not require considerable resources to make further adaptations for people who become disabled.
23. The Government’s strategy required all new housing built with public funding to meet the Lifetime Home standard by 2011. There have been a number of studies into the costs and benefits of building to the Lifetime Homes standard⁵. These have concluded that the costs range from £545 to £1,615 per dwelling, depending on:

- the experience of the home designer and builder;

⁵ A number of studies can be accessed at Housing LIN: Lifetime Housing Standards research findings at http://www.housinglin.org.uk/Topics/browse/Design_building/LifetimeHomes/Standards/?parent=8576&child=8564

- the size of the dwelling (it is easier to design larger dwellings that incorporate Lifetime Homes standards cost-effectively than smaller ones);
 - whether Lifetime Homes design criteria were designed into developments from the outset or whether a standard house type is modified (it is more cost effective to incorporate the standards at the design stage rather than modify standard designs); and
 - any analysis of costs is a 'snapshot' in time. The net cost of implementing Lifetime Homes will diminish as the concept is more widely adopted and as design standards, and market expectations, rise.
24. The most significant factor when considering costs was whether the home had been designed to incorporate Lifetime Homes criteria from the outset or whether a standard design had been modified.⁶ Additionally, the website www.lifetimehomes.org.uk also references a study that concluded Lifetime Homes did not have a significant impact on overall project costs because the requirements of the revised Part M of Building Regulations now require many of the same considerations to be addressed as a matter of course.
25. Requiring all new housing development to meet the Lifetime Homes Standard would help to provide a flexible and adaptable supply of housing to suit the needs and changing circumstances of all members of the community. Option 111 in the Issues and Options Report 2012 set out the requirement for all homes to be built to Lifetime Homes standards. Whilst the internal requirements of Lifetime Homes are fairly straightforward to achieve and relate well to other standards such as the London Plan and Homes and Communities Agency's residential space standards, the external space standards can be more difficult to achieve on all sites, particularly in relation to parking layout and level access from this to the home, the approach adopted in Table X reflects the work of the DCLG Lifetime Homes Technical Forum and the Greater London Authority, Joseph Rowntree Foundation and Habinteg⁷. Viability testing of residential development in setting the draft Community Infrastructure Levy charges has factored in Lifetime Homes and Affordable Housing policy thresholds and percentages and found the policy not to harm viability.
26. The alternative approach of setting a percentage approach (Option 112 of the Issues and Options report 2012) would on the other hand require Development Management officers to ascertain which dwellings were meeting Lifetime Homes and whether this complied with the policy. This alternative approach misunderstands the fundamental nature of Lifetime Homes as an application of the principle of inclusive design which tries to ensure that all designs are suitable for the full diversity of users and can be

⁶ Levitt Bernstein, 2009 Impact on site density of Lifetime Homes. Can be accessed at webarchive.nationalarchives.gov.uk/20120919132719/.../2180877.pdf

⁷ Habinteg/JRF (2003), Lifetime Homes: Living well together- achieving sustainable flexible homes in higher density neighbourhoods.

adapted to meet the diversity of needs of that user throughout their lifetime. Someone who develops mobility difficulties during their lifetime would then face the lottery of whether they lived in the percentage of houses, which met the standard.

27. As Lifetime Homes design standards can be incorporated into development at an early stage and are already required for all Affordable Housing delivered in the city, it is considered appropriate to set out a requirement for all homes to comply with Lifetime Homes standards. However, the supporting text of the policy (in Table X) identifies that some of the criteria, such as the criterion on parking provision, may not be fully met on some sites. Some flexibility may need to be applied in relation to the parking element of Lifetime Homes, as rigid application particularly in high density settings can result in poor urban design. The expectation will be that all homes are designed with the potential to be altered in the future for the changing needs of their occupants.

Wheelchair Housing Design Standard

28. As noted by the Lifetime Homes website, whilst Lifetime Homes can accommodate or adapt to the needs of many wheelchair users, the standard does not match the enhanced accessibility provided by a property constructed to the Wheelchair Housing Design Standard.⁸
29. The Council's current Affordable Housing Policy Guide requires at least 2% of new Affordable Housing to be fully wheelchair accessible, and a further 8% to meet other specialist needs as required. It also requires all new Affordable Homes to be built to the Lifetime Homes standard as a minimum. In the Council's Housing Strategy 2012 – 2015, the Council aims to review its requirements around the Lifetime Homes Standard for new Affordable Homes, the percentage of wheelchair accessible homes on new developments, and to consider how it can ensure that new homes are designed in a way that disabled adaptations can easily be fitted in the future if required. The Council also confirms that it will continue to identify the need for specialist housing for people with physical and/or sensory disabilities, and explore, in the longer term, how better use can be made of the private sector in helping disabled people to access appropriate housing. In London, the London Plan requires 10% of all new homes to be built to be easily adaptable to become fully wheelchair accessible.
30. The NHS in 2000 estimated that wheelchair users made up around 2% of the population of England. However, there has not historically been a nationally adopted standard practice for identifying the housing needs of wheelchair users. The research report *Mind the Step: An estimation of housing needs*

⁸ Thorpe, S. (2006) 2nd Edition Wheelchair Housing Design Guide. Can be accessed at: <http://www.habinteg.org.uk/main.cfm?type=WCHDG>

*amongst wheelchair users in England*⁹ was published by Habinteg Housing Association and London South Bank University in 2010. Its conclusions highlight that wheelchair users face particular design and accessibility barriers, both in and around the home and in the wider environment. The majority of homes in England (84%) do not allow someone using a wheelchair to get to and through the front door without difficulty and only 0.5% of homes are reported to be 'accessible and adaptable'. The 2010 report presents national and regional estimates of housing need among wheelchair users in England and shows how these figures can be used to produce similar estimates at local authority level.

31. As part of its statutory duty as the local housing authority, the Council maintains a list of households who have applied for social housing accommodation. Of these applicants who are classified as in urgent housing need: 21 (0.32% of all people on the register) are currently in need of a home suitable for indoor and outdoor wheelchair use; and 18 (0.2% of the register) are unable to manage steps or stairs and may use a wheelchair at certain times. (It should be noted though, that the Council's housing (Home-Link) register is currently being reviewed, and it is expected that these numbers may reduce, at least in the short term). According to the Census 2011, 3.64% of Cambridge residents considered themselves to have had bad or very bad general health in the previous year, whilst 12.97% of Cambridge residents stated that they had a long-term activity limiting illness. Additionally, within the 16 – 74 age group of Cambridge residents, 2,437 people stated that they were not working due to illness or disability. However, the Census 2011 figures will not show all disabled people and not all of those included in the figures will be disabled.
32. Cambridgeshire Joint Strategic Needs Assessment data suggests that across England as a whole, 0.19% of wheelchair users are estimated to be in unsuitable accommodation.
33. The report *Mind the Step* suggests a formulaic approach to calculate a crude estimate of unmet need for wheelchair user housing within a local authority area. This estimate is based on the authors' assessment of need for each English region, applied as a proportion of households within the local authority area. The 2011 Census counted around 46,714 households in Cambridge. As such, the estimate or unmet need, using the regional estimates from *Mind the Step*, would be calculated as follows:

Approximate unmet need =
46,714 households
x 2% (i.e. wheelchair user households in the East of England)
x 9% (% of wheelchair user households with unmet housing need)

⁹ Habinteg Housing Association and London South Bank University (2010) *Mind the Step: An estimation of housing needs amongst wheelchair users in England*. This document can be accessed at:
http://www.habinteg.org.uk/mediaFiles/downloads/53930501/Mind_the_step_onlineversion_pdf.pdf

= 84 households in Cambridge with unmet need (or 0.2% of all Cambridge's households)

34. The method for producing an indicative local authority estimate is set out in paragraph 5.1 of *Mind the Step* and involves taking the regional figure for the percentage of all households that are wheelchair user households (Table 3, Column 4, Page 34) and multiplying this by the number of all households in the local authority. This gives an estimate for the number of wheelchair user households. The report then advises multiplying this by the regional figure for the percentage of wheelchair user households with unmet housing need (Table 3, Column 5, Page 34).
35. With regard to adaptations, it is important to bear in mind that the figure for unmet housing need set out as a result of the *Mind the Step* approach only relates to wheelchair user households. While wheelchair users will sometimes (but by no means always) need relatively major adaptations if living in an unsuitable home, in numerical terms they comprise about 12% of disabled people and so there will be many others who also require support through provision of adaptations.
36. A number of local authorities have adopted policy that requires 10% of all new homes should be built to full Wheelchair Housing Design Standard or to a point which is readily adaptable for wheelchair users. The number of new wheelchair user homes produced in this way will obviously depend on the total number of properties built. Having worked out its estimate of unmet need, a local authority will be able to see what proportion of the unmet housing need will (or would) be met – and over what period of time – by an effective percentage-based policy. This can then inform decisions about the projected balance between new build, adaptations and allocations. In relation to the Wheelchair Housing Design Standard, it is considered that market and Affordable Housing in Cambridge should be considered in the same manner, subject to viability.
37. It is proposed that 5% of all new housing development of 20 or more self-contained units should be provided as housing which would suit the needs of wheelchair users. The percentage and threshold were reached by applying different percentages of homes meeting the Wheelchair Housing Design Standard (e.g. 3%, 5%, 10%) to all sites without planning permission in Cambridge, which would be likely to be developed by 2031. The sites identified and tested for each percentage used a set threshold in order to allow at least one house built to Wheelchair Housing Design Standard to be delivered. The sites include allocated sites without planning permission; sites identified through the Strategic Housing Land Availability Assessment (SHLAA); sites potentially to be removed from the Green Belt for housing; and windfall sites (with a 20% discount applied).

Percentage	Threshold (Units)	Estimated Number of units to be delivered to Wheelchair Housing Design Standard if all sites came forward
3%	34	57
5%	20	117
10%	10	362

38. Applying 5% as the percentage and 20 units as the threshold for delivery of a minimum of one unit built to Wheelchair Housing Design Standard would allow the delivery of 117 units, which is close to the number reached by using the *Mind the Step* formula of 84 households being in unmet need for wheelchair appropriate housing.

ISSUE: PROTECTING GARDEN LAND AND THE SUBDIVISION OF EXISTING DWELLING PLOTS

Policy:

Policy 41: Protecting Garden Land and the Subdivision of Existing Dwelling Plots

Proposals for development on sites which form part of a garden or group of gardens, or which subdivide an existing residential plot will be permitted in locations with good sustainable transport accessibility (see strategy section) and where:

- i. the form, height and layout of the proposed development is appropriate to the surrounding pattern of development and the character of the area;
- ii. sufficient garden space and space around existing dwellings is retained, especially where these, and views of trees worthy of retention, contribute to the character of an area;
- iii. the amenity and privacy of neighbouring, existing and new properties is protected;
- iv. provision is made for adequate amenity space, vehicular access arrangements and parking spaces for the proposed and existing properties, and
- v. there is no detrimental effect on the potential comprehensive development of the wider area.

Supporting Text:

For the avoidance of doubt, proposals that are considered to be appropriate on garden sites in accordance with the criteria set out in this policy will also be assessed against other policies within the Local Plan, to ensure that they achieve a high standard of development. This policy covers sites where:

- an existing house or houses are retained and new dwellings are erected in the garden or multiple garden areas or curtilage; and/or
- the existing buildings are demolished and the plot(s) sub-divided in order to make way for further residential development.

Gardens are an important environmental resource and are a vital component of Cambridge's character, especially in its more verdant, arcadian quarters. They form part of an area's development pattern, providing a setting for buildings, which in turn informs the prevailing privacy and amenity enjoyed by residents. They provide a semi-natural habitat for local wildlife and corridors for the movement of wildlife through the urban environment. Collectively, they help to mitigate fluvial and surface water flooding in otherwise built-up parts of the city.

As the definition of previously developed land within the National Planning Policy Framework excludes private residential gardens and in the light of the need to consider the environmental impacts of development on garden land, the inappropriate development of garden sites will be resisted. However, some forms of redevelopment and infill development, which are well designed and make efficient use of land, will continue to be a valuable additional source of housing supply and need not be inappropriate.

How the Policy Came About:

39. In recent years, garden development has become a contentious issue. The National Planning Policy Framework (paragraph 53) states that "Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area." Additionally, the definition of previously developed land within the National Planning Policy Framework excludes private residential gardens.
40. In many cases, though, development on garden land may be regarded as entirely appropriate and there are many clear, definable benefits to such development. They reduce the need to extend development out into the Green Belt and the wider countryside, create new homes without the need for significant additional infrastructure provision, provide better utilisation of land in areas where people no longer require large gardens due to changing lifestyles. For these reasons, garden land development may add to housing stock in ways that are sustainable and which meet identified local housing need.
41. There are also many arguments against developing on gardens. They may lead to increased building mass, loss of character, increased population density and a gradual associated increase in demand on local infrastructure. Environmentally, garden development can result in a loss of green space and paving over gardens; a reduction in habitats and biodiversity; and an increased risk of flash flooding due to increased run off.

42. Policy 3/10 Sub-division of Existing Plots in the Cambridge Local Plan 2006 has been used on a number of occasions in recent years to address residential development within the garden area or curtilage of existing properties. This policy was drawn up as it was recognised that whilst the provision of new dwellings within the curtilage of existing properties provides opportunities for additional homes in the City, the development of existing gardens or curtilages needs to be handled carefully in order to avoid creating new developments, which adversely affect the amenities of local residents or the character of the area. In order to clarify the use of this policy in the light of a change in approach to garden land at a national level, an advice note was produced on development affecting private gardens in Cambridge in June 2011.
43. Within the Issues and Options report (2012), the Council put forward two options (114 and 115). Option 114 suggested the development of a criteria-based policy for small scale residential development in gardens, whilst Option 115 set out the potential to restrict development in gardens. The Interim Sustainability Appraisal, which accompanied the Issues and Option report, suggested that Option 114 is likely to help increase delivery of much-needed new housing in Cambridge. However, this option is also likely, depending on location, to be at the cost of biodiversity and green infrastructure, flood risk including climate change adaptation, and landscape. However, in areas of existing low density development or where existing buildings are demolished, this policy could potentially achieve new housing without compromising sustainable communities. Potential adverse effects of this option would be most acutely felt in areas already experiencing significant pressure on green space within the urban area. This option is likely to increase pressures on levels of personal car use, including pressures on car parking,
44. Option 115 which suggested the restriction of infill development would potentially restrict the potential delivery of much needed housing, although the wording to require 'very specific local circumstances' suggests this option would be developed to minimise its application. It would help contribute positively to addressing many sustainability issues relating to biodiversity and green infrastructure and maintaining local townscape.
45. Whilst new residential development is welcomed in addressing housing need, the development of existing gardens or curtilages needs to be handled carefully in order to avoid creating developments, which adversely affect the amenities of local residents and the character of the area. It is considered that there is a need to have a measured policy approach, which does not preclude development, where appropriate. As such, given the mixed character, density and form of existing residential development within the city, it is appropriate to take forward a criteria based approach, which would allow flexibility to consider local circumstances.

46. This policy approach would cover sites where:
- an existing house or houses are retained and new dwellings are erected in the garden or multiple garden areas or curtilage; and/or
 - the existing buildings are demolished and the plot(s) sub-divided in order to make way for further residential development.
47. Reference is not merely be made to infill development within rear gardens, as this type of development can affect the whole curtilage of a property. The proposed criteria based policy is positively worded and include criteria on the following issues:
- The character and appearance of the area;
 - Form and density of the proposed development;
 - Amenities of neighbouring properties;
 - Provision of adequate amenity space, vehicular access arrangements and parking spaces for the proposed and existing properties;
 - Effect on the comprehensive development of the wider area.
48. In terms of alternative options, there was a suggestion that there should be a hierarchy to 'sites' based on back gardens, which could lead to large gardens being subdivided and used for public open space or amenity. Due to the challenges of land assembly, this approach will not be pursued through the Local Plan Review. In relation to restricting permitted development rights in order to prevent buildings in back gardens from becoming residential accommodation, this cannot be undertaken through the Local Plan Review process. It would need to result from either national changes to permitted development rights or through the introduction of an Article 4 direction. The Council has not followed this approach, considering a city-wide Article 4 direction disproportionate and with significant revenue cost implications, either through compensation claims or as a result of the increased planning casework load arising from otherwise permitted development proposals, which would not attract a fee.

ISSUE: FLAT CONVERSIONS

Policy:

Policy 42: Flat Conversions

Proposals to convert a single family dwellinghouse or a non-residential building into self-contained flats will be permitted where:

- i. the property (including through acceptable extensions and roof conversions) has an internal gross floor area of at least 120m² (excluding stairwells, balconies, external open porches, conservatories and areas with a floor to ceiling height of less than 1.5m), and proposed room sizes meet minimum room sizes (see Policy 39);

- ii. the ground or lower ground floor includes a family (2 bedroom plus) unit with garden access;
- iii. the proposal in terms of the number of units and scale of associated extensions would not have an unacceptable impact on the amenity or character of the area or place unacceptable stress on highway safety in streets already experiencing overnight parking stress;
- iv. the proposal would result in a satisfactory standard of amenity for its occupiers and is designed to avoid significant negative impacts on neighbouring residential properties; and
- v. the proposal includes appropriate refuse, recycling and cycle storage to serve the development.

Supporting Text:

For avoidance of doubt, this policy also applies to conversions for aparthotels and where the flats are intended for students or other multi-occupancy. It also applies where residential units are proposed within the rear yards of shops or other retail units.

The subdivision of predominantly large houses into flats has contributed to the supply of reasonably affordable private rented accommodation in Cambridge over time, meeting a need in the market. However, in some circumstances, residential conversions have proved unsatisfactory, providing poor or inadequate accommodation for tenants and leading to problems and issues for adjoining residents and for wider local areas. As dwelling conversions tend to come forward sporadically it is often difficult to account for the cumulative impacts of the conversions. Whilst an individual scheme may appear to have a relatively minor additional impact on its own, it is important to consider cumulative impact when looking at individual schemes. Increasing the units of accommodation within existing established streetscapes can generate additional car parking requirements. In many cases, it is not possible to provide on-site parking, and this leads to saturation of existing on-street spaces. This not only removes opportunities for other nearby residents to park within the street, but also has an overall negative impact on the quality of the streetscape.

The detrimental impact of the conversion of existing single dwellinghouses or non-residential development into two or more smaller units of accommodation can include:

- Off-street parking within front gardens with an associated reduction in front garden space and vegetation and with loss of domestic character;
- Disturbance of the building's façade and entrances;
- Extension of the building with associated impacts on privacy and quality of life, daylight and the character of the area;
- Intensification of the building's use, with potential for impacts on overlooking/privacy and acoustic issues;
- Saturation of on-street parking resulting in car dominated environments;

In all flat conversions, it is expected that the resulting development does not cause detriment to the character of the area or the amenity of surrounding properties. In order to ensure that the proposed development provides units of a sufficient size for its occupiers, individual units must provide appropriate minimum internal floor standards and headroom in accordance with the Council's minimum internal floorspace standards set out in Policy 39. Furthermore, the stacking between units should ensure that different rooms are not stacked inappropriately, e.g. the kitchen of one unit over the bedroom of another unit with resultant noise impacts on the bedroom.

Streets with overnight parking stress are defined as those streets where the level of on-street overnight parking leaves less than 10% free notional on-street overnight parking capacity. Notional parking capacity is defined from the maximum number of spaces that can be lawfully parked on (i.e. excluding double parking, corner parking, spaces with yellow line control, on bus only lanes and cycle lanes (including outside areas of formal enforcement) and in controlled parking areas with spaces blocking drive ways and access for emergency vehicles. A marked survey should be completed for conversions where this is likely to be an issue, unless there has been another recent survey on the same street. The survey should cover a radius of 200m around the property including side roads. The addition to stress will be measured by the 'no more than' parking standard before and after the conversion minus the acceptable level of off street parking before and after. This requirement is relaxed in controlled parking areas where the scheme is car-capped, a planning obligation prevents residents applying for parking permits, or similarly controlled as a car-free development.

How the Policy Came About:

49. Given the need for housing in Cambridge, it will be important for the Local Plan to ensure that opportunities to provide new housing are explored. Whilst the sub-division of large properties into additional dwellings makes a useful contribution towards the overall housing need in the city, it can lead to the loss of family accommodation and in some cases, a loss of historic character. There is a need to ensure that any proposals would result in a satisfactory living environment, without overcrowding, and that the quality of Cambridge's historic environment is preserved and enhanced. Whilst it is important to retain existing housing wherever possible, this needs to be balanced against other objectives and priorities, including the need for different sizes of dwelling unit and the National Planning Policy Framework's requirements for flexibility and responsiveness to changing economic circumstances. In some cases, it will be appropriate to replace poorly designed housing or housing that is no longer cost-effective to repair and maintain with housing that meets modern standards of design, layout and energy efficiency.
50. The current Local Plan includes policies relating to the conversion of large properties (5/2). In accordance with national guidance, it is considered

reasonable to continue with this approach on the basis that it is the most appropriate way of ensuring that opportunities to provide new housing are explored and suitable living environments are achieved. This approach has been supported by respondents to the Issues and Options consultation on Option 118. There was some concern, however, about the need to retain a variety of housing stock to meet different households' needs.

51. Pursuing this option would allow for the development of a policy which would address the conversion of large properties. This approach is consistent with national guidance and helps to maximise opportunities to increase housing supply in Cambridge to meet need. However, a balanced approach must be taken and consideration given to the needs of surrounding occupiers and the character of the area as a whole. In relation to the conversion of large properties to a greater number of smaller units, a criteria based approach should set out the need for the development to have a satisfactory standard of amenity for its occupiers and neighbouring properties; consideration of the impact on on-street parking and the character of the area; and refuse and cycle storage.
52. In the past, an existing floorspace of 110m² was utilized in the Cambridge Local Plan 2006 as a standard when assessing whether a property is suitable for conversion. The standards cited within the Council's internal residential space standards in Policy 38 are considered robust and will be applied to flat conversion applications, acting as one of the determinants of quality conversion schemes, but it is also considered appropriate to set out a new minimum existing floorspace for conversion of 120m², which reflects the need for bigger unit sizes to meet the residential space standards.

ISSUE: RESIDENTIAL MOORINGS

Policy:

Policy 43: Residential Moorings

Proposals for residential moorings will be permitted, where the proposal

- i. integrates successfully and positively with the surrounding landscape and/or townscape;
- ii. is served by adequate pedestrian and vehicular access;
- iii. is served by appropriate electricity, sewerage and refuse disposal facilities;
- iv. has no significant negative effect on the amenity, visual character, water quality, historic and ecological value of the river or nearby land;
- v. is close to existing services and amenities;
- vi. only provides minimal essential lighting, which shall be located so as to minimise glare and/or visual intrusion; and
- vii. does not impede navigation and/or the use of the footpath.

Supporting Text:

The delivery of further residential moorings within off-river basins or marinas will be considered favourably, providing appropriate access arrangements can be made and onshore facilities constructed which comply with other policies of the plan.

Over the course of the last two decades, the city has seen a gradual increase in the number of boat owners wishing to live permanently on the River Cam and the number of visitors spending time on the city's waterways. They may only be suitable for the needs and housing expectations of a small sector of the population, but they contribute both to the diversity of the city and to the supply of different forms of housing.

The Conservators of the River Cam are the statutory navigation authority, responsible for the maintenance of navigation of the River Cam from the Mill Pond, Silver Street to Bottisham Lock. Working with the Conservators and other stakeholders, the Council is responsible for the management of existing residential and visitor moorings on the River Cam and has set out its approach to this issue through a moorings management policy. A limited number of licences are issued to those wishing to moor boats at specific areas along the River Cam at Midsummer Common, Stourbridge Common and Jesus Green.

Given the extensive usage of the river by other river users, including anglers and rowers, and the potential for further moorings on the river itself to have a detrimental effect on navigation, the delivery of further residential moorings within off-river basins or marinas will be considered favourably. The Council will continue to work with the Conservators of the River Cam, boaters, landowners, and other stakeholders to increase the supply of residential moorings in Cambridge.

Where new residential mooring proposals come forward, consideration will need to be given to the quality of life experienced by both the boaters themselves and any neighbouring occupiers. Furthermore, the impact on the natural and historic environment is also paramount, given the richness of the River Cam's wildlife, its cultural and historic significance and its role in flood risk management. Residential car and cycle parking standards will be applied as set out in Policy XX with consideration given to the impact of car and cycle parking on nearby streets.

How the Policy Came About:

53. The National Planning Policy Framework sets out the requirement in paragraph 50 to deliver a wide choice of quality homes and to create sustainable, inclusive and mixed communities. Whilst representing a very small percentage of housing provision within Cambridge and only being suitable for the needs and housing expectations of a small sector of the population, residential moorings can contribute both to the diversity of the

city and to the supply of different forms of housing. The Council has a dual role in relation to the provision of moorings, with the responsibility for managing existing moorings on the River Cam and planning for further provision of moorings.

54. The Conservators of the River Cam are the statutory navigation authority, responsible for the maintenance of navigation of the River Cam from the Mill Pond, Silver Street to Bottisham Lock. Working with the Conservators and other stakeholders, the Council is responsible for the management of existing residential and visitor moorings on the River Cam and has set out its approach to this issue through a moorings management policy, which has been revised a number of times since its inception. The existing Moorings Policy was initially approved by the Executive Councillor for Community Development and Leisure in March 2005 and was subsequently reviewed in 2006/2007. Within this Moorings Policy, the Council sets fees for residential and visitor mooring licences. The licensing process sets out the Council's expectations in terms of standards of riverworthiness, behaviour and occupancy. This is linked with the Conservators of the River Cam's navigation licensing process.
55. There is currently calculated to be space on the River Cam within the city for some 70 licensed boats to be moored with sufficient space between moored vessels. This is based on the capacity of the river having been calculated on the amount of available riverbank divided by the average length of a vessel (70ft or 21.34 metres) and an assessment made of the space needed by other river users to access the river. The overall figure of 70 boats includes allowance for 15 wide-beam boats of 2.15 metres or more. Only limited areas of the Cam are suitable for the mooring of boats of this size.
56. Over the course of the last two decades, the city has seen a gradual increase in the number of boat owners wishing to live permanently on the River Cam and the number of visitors spending time on the city's waterways. A change in mooring management policy in the 1990s gave rise to additional opportunities for residential mooring at Midsummer Common, Stourbridge Common and Jesus Green. Current mooring sites are shown on the Council's Boat Mooring Map (available via Google on the Council's website).
57. Existing areas for permanent residential moorings include Area B where mooring is permitted for 75 metres on Jubilee Gardens upstream of the weir; Area D2 adjacent to Jesus Green, Areas E1, G and H adjacent to Midsummer Common; and Areas K2 and M adjacent to Stourbridge Common.
58. Visitors wishing to moor a boat in Cambridge are subject to a maximum 48-hour stay, and are not permitted to return within seven days of leaving. Areas for visitor moorings are marked with green markers and lines on the Council's Boat Mooring Map. These areas include Area C adjacent to

Chesterton Road and Area E2 adjacent to Midsummer Common, outside the Fort St George public house.

59. Areas for temporary mooring are marked with yellow markers and lines on the Council's Boat Mooring Map. These areas include Area D1 where temporary mooring is permitted for up to two hours from 10am to 4pm upstream of the pump out, and Area K1 where temporary mooring is permitted for up to two hours from 8am to 6pm upstream of the pump out.
60. Areas where no mooring is permitted are marked with red markers and lines on the Council's Boat Mooring Map. These areas include Area A where no mooring is permitted upstream of the lock and includes 36 metres downstream of the lock. Visiting punts can stay for up to one hour. In Areas F, J, L and N, no mooring is permitted at all.
61. New residential moorings require planning permission and need access to adequate services including water supply, electricity, and disposal facilities for sewage and rubbish. Access is also required for emergency vehicles. New moorings should not have a negative impact on the amenity, conservation and ecological value of the river. Mooring facilities are defined as either on-line or off-line. On-line moorings are often merely linear moorings along the riverbank itself, whilst off-line moorings involve boats navigating into a separate engineered basin or larger marina separate from the river.
62. Within the Cambridge Local Plan 2006, the Council set out Policy 3/9 on Watercourses and Other Bodies of Water. This policy addressed the need for further moorings obliquely, but mention of the allocation of Site 3.01 off Fen Road for off-river moorings was made in the supporting text (paragraph 3.28). Site 3.01 has not yet come forward for development. The Council's Issues and Options report (2012) set out a proposal for a criteria-based policy for assessing proposals for new residential moorings. In addition to the inclusion of Option 120 in the Issues and Options report, the Council also asked whether there were any suitable sites for the provision of further residential moorings within the city.
63. The Interim Sustainability Appraisal of the Issues and Options report identified that residential moorings have the potential to make a limited contribution to increased housing supply, and when coupled with this option to ensure adequate services, access, and the protection of amenity, should contribute positively to communities and well-being. Criteria to ensure that the ecological value of waterways is maintained should positively influence biodiversity and protect water quality. Flood risk management of moorings will bring benefits, potentially helping to address flood risk issues in North and South Cambridge.
64. The majority of respondents to the Issues and Options report supported the need to have a policy on provision of residential moorings and identify areas

for new moorings, despite having concerns about the reality of their development and potential for knock-on impacts in a given area. Reference was made to off-line moorings in the form of marina provision. Concern was raised that any mooring provided within the city boundary with should have standards enforced, equivalent to those which would be required of land dwellings. For example, coal and diesel should not be burned emitting fumes at one to two metres in height.

65. Whilst there may be demand for new residential and visitor moorings within Cambridge, it is recognised that there is limited suitable space available in the city. In addition to the need to continue to balance the needs of the long-term residential moorings against those of the short-term visitor moorings, which can support tourism in Cambridge, there is a balance to be struck between maintaining and increasing the number of areas available for residential and visitor moorings and the needs of other users of the river, including commercial operators, anglers, rowers and rowing clubs and other local residents. Notwithstanding the needs of other users of the river, other key issues for the provision of new residential moorings include the need to consider the potential impact on the river itself and the surrounding landscape/townscape; parking levels in the surrounding area; the amenity of other local residents. A River Cam capacity study is being developed, which is likely to make reference to these issues. It is considered that the development of a criteria-based policy for residential moorings would address the potential to deliver further moorings whilst recognising the need to maintain the quality of the riparian environment and safeguard local amenity.
66. Many of the sites identified for residential moorings during Issues and Options consultation are not situated within Cambridge's administrative boundary. As such, these sites cannot be allocated for residential moorings provision by Cambridge City Council. Sites put forward in South Cambridgeshire included:
 - Fen Ditton;
 - Land to the west of the River Cam off Fen Road;
 - Land to the south-east of Clayhithe Bridge, Waterbeach.
67. Within Cambridge's administrative boundary, two sites were put forward for further consideration:
 - North side of the River Cam, near Fen Road;
 - Further mooring on the south side of the river on Stourbridge Common.
68. A site of 0.98ha on the northern bank of the River Cam, lying south-east of Fen Road, was allocated in the Cambridge Local Plan 2006 for off-river moorings (Site 3.01). This site is owned by the Conservators of the River Cam and has not come forward for development since 2006. This site has been

consulted on as part of the Issues and Options 2 consultation (Site reference RM1 – Fen Road) for allocation as off-river moorings and lies directly adjacent to Option CF1 – Residential Mooring at Fen Road which was consulted on in South Cambridgeshire’s Issues and Options 2, Part 2 consultation. Both consultations took place at the same time.

69. The provision of further moorings on the southern side of the River Cam at Stourbridge Common was also considered in drawing up sites for consultation as a part of Issues and Options 2 consultation. Officers responsible for managing moorings within the city confirmed that all possible mooring areas are already in use in this location. Further moorings may impact negatively upon the navigation of the river and its heavy recreational use. Consultation on the management of moorings on nearby Riverside is scheduled to take place in the near future, which may impact further on the number of moorings available within the city.

DELIVERY AND MONITORING FOR MAINTAINING A BALANCED SUPPLY OF HOUSING

Policy 36: Specialist Housing

- All planning applications relating to this policy submitted in the monitoring year will be checked for compliance with the policy and for the number of car home bedrooms and extra care units delivered under this policy. This will be reported in the Annual Monitoring Report. Given the presence of the county-wide Extra Care Commissioning Strategy, it is sensible to monitor for delivery of schemes to meet an identified need. In the case of housing for other vulnerable people, it is considered that these schemes can be very specialised and come forward only rarely.

Policy 40: Lifetime Homes and Lifetime Neighbourhoods

- This will be monitored through the processing of applications.

Policy 41: Protecting Garden Land and the Subdivision of Existing Dwelling Plots

- All planning applications relating to this policy submitted in the monitoring year will be checked for compliance with the policy and for the number of units delivered under this policy. This will be reported in the Annual Monitoring Report.

Policy 42: Flat Conversions

- All completions following planning applications for flat conversions will be collected through County housing completions work.

Policy 43: Residential Moorings

- All planning applications relating to this policy submitted in the monitoring year will be checked for compliance with the policy and for the number of moorings delivered under this policy. This will be reported in the Annual Monitoring Report.