Appendix A



Cambridge and South Cambridgeshire Modifications Consultation Report November 2015

Contents

1 2	Introduction Responding to the Inspectors' letter	Page Number 2 5
Appendices		
A	Proposed Modifications to the Cambridge Local Plan	17
В	Proposed Modifications to the South Cambridgeshire Local Plan	72
С	Inspectors' Letter of 20 May 2015	158

1 Introduction

- 1.1 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 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.
- Joint examination hearings on strategic issues were held between November 2014 and April 2015, including on 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

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

What is this consultation about?

- 1.3 Section 2 of this report outlines the further work that we have carried out to address the issues raised by the Inspectors, how we have considered that work and identifies some changes to the Local Plans that arise from the work. The next stage in the Local Plan process is to carry out public consultation on these Modifications to the Local Plans.
- 1.4 The results of consultation will be considered by the Councils who will decide if any further changes need to be made. We will then submit the consultation responses, evidence base documents and proposed modifications to the Planning Inspectors, so they can reopen the examinations.

What can I comment on?

- 1.5 This consultation relates <u>specifically</u> to the issues the Inspectors have asked the Councils to address and the Modifications to the Local Plans proposed as a result of the additional work undertaken. You can also comment on the Sustainability Appraisal Addendum which accompanies the consultation.
- 1.6 Comments in support of or objecting to a proposed Modification should be made. If you consider a further or alternative modification should have been

made in response to the Inspectors' letter and/or the additional work undertaken in response to that letter that is not included in the consultation document, then you should submit an objection to this consultation setting out those modifications and the reasons for them. If you made an objection or a comment in support of the submitted plans at an earlier stage but want to add new points arising from the additional work then you should also do so in response to this consultation.

What can't I comment on?

- 1.7 This is <u>not</u> intended as a process to repeat the formal consultation already carried out on the Local Plans in Summer 2013. The representations made at that time remain in front of the Inspectors and there is no need to repeat them.
- 1.8 This is <u>not</u> a consultation on the Local Plans as a whole, just the issues raised by the Inspectors. It is not possible to make comments at this stage in the process that relate to any other aspects of the Local Plans that have not been raised by the Inspectors in their letter of 20 May 2015.

Deadline for comments

1.9 Please note that the deadline for responses is **5pm** on **Monday 25 January 2016.** Unfortunately responses received after this deadline can only be accepted in exceptional circumstances. If you have any queries as to how to submit a representation, or about the consultation as a whole, please contact one of the planning policy teams using the contact details below at paragraph 1.13.

How to have your say

- 1.10 The Modifications proposed to the plans are presented in Appendices A and B as two schedules, for the Cambridge Local Plan and for the South Cambridgeshire Local Plan respectively. The Modifications are listed in plan order and include the reason why the Modifications are being proposed and identify whether they are main modifications, which materially alter the policies of the plans, or whether they are minor modifications, which provide clarity.
- 1.11 Once you have looked through this consultation document, please send us your comments. There are a number of ways in which you can do this:
 - Using the Councils' online consultation system This is the Councils' preferred means of receiving representations as it is the fastest and most accurate method, helping us to manage your representations quickly and efficiently. Separate instructions on how to use the online system are provided on the Councils' websites and officers in the planning policy teams are always available to help if you have any queries. To start using the online consultation system please go to: http://scambs.jdi-consult.net/localplan/

Using a response form – An electronic version of the response form is available from the planning policy teams, so that if you do have access to a computer, you can fill this in electronically and email it to the Councils. If you do not have access to the internet, a paper response form can be completed and sent to the Council. Copies of the response form are available at the Councils' customer service centres or directly from the planning policy teams.

What happens next?

1.12 Once the consultation on this report has finished, the Councils will register the comments received and publish them on their websites. A report will be prepared containing summaries of all of the representations received, which will be reported to the Councils' respective committees and Full Council meetings in March 2016. The Councils will then submit material to the Planning Inspectors for examination. It is anticipated that examination sessions will recommence after this information is submitted to the Inspectors.

We're here to help

1.13 Your views are important to us, but we recognise that the planning system is not always easy to understand and navigate. We want to make sure that as many people as possible have an opportunity to have their say, regardless of their previous experience with planning matters. Officers from both authorities' planning policy teams are here to help guide you through the process, and you can contact us using one of the following methods:

Planning policy team, Cambridge City Council

- You can phone us on 01223 457000 (ask to speak to someone in the planning policy team);
- You can email us at policysurveys@cambridge.gov.uk

Planning policy team, South Cambridgeshire District Council

- You can phone us on 01954 713183;
- You can email us at ldf@scambs.gov.uk

2. Responding to the Inspectors' Letter

2.1 This section of the report outlines each of the Inspectors' issues raised in their letter dated 20 May 2015, and the Councils' response to these points.

Objectively Assessed Need for New Housing

- 2.2 The Inspectors have asked the Councils to consider whether the DCLG¹ 2012 based household projections (published February 2015) suggest a different level of housing need for Cambridge and South Cambridgeshire.
- 2.3 The Inspectors say 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.
- 2.4 The Inspectors say 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.
- 2.5 In response to the issues raised by the Inspectors, the Councils have commissioned further independent assessment. This work, relating to Objectively Assessed Need for Housing², sits alongside the Cambridge Sub Region Strategic Housing Market Assessment (SHMA), and has 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 CLG demographic projections;
 - Whether they should be increased in order to provide more affordable housing.
- 2.6 The study addresses a recognised limitation of the Cambridge CLG household projections and proposes an appropriate demographic starting point of 10,069 new dwellings. It confirms the CLG 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.
- 2.7 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,

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¹ Department for Communities and Local Government

² Cambridge and South Cambridgeshire Local Plan Examination – Objectively Assessed Housing Need: Further Evidence (RD/MC/040).

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.

- 2.8 On this basis, the study concludes that objectively assessed housing needs in the study area are:
 - 19,337 dwellings for South Cambridgeshire
 - 14,000 dwelling for Cambridge City.
- 2.9 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.
- 2.10 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.
- 2.11 This issue is addressed in the Development Strategy Update document.

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

2.12 No main modifications to the Cambridge Local Plan are proposed in relation to the Objectively Assessed Need for homes in Cambridge. A number of minor modifications are proposed to update the text of the plan.

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

2.13 The findings of the Councils' further evidence work on Objectively Assessed Need for homes has resulted in proposed main modification PM/SC/2/I to Policy S/5 of the South Cambridgeshire Local Plan to provide for a housing requirement of 19,500 homes and a number of minor modifications to update the text of the plan. The change 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.

Overall Development Strategy

- 2.14 The Inspectors have raised issues about the apparent inconsistency between the Cambridge and South Cambridgeshire Sustainable Development Strategy Review³ (SDSR) and the Plans' reliance on meeting development needs in new settlements. In particular, they raise 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.
- 2.15 In response to these concerns, the Councils have undertaken a number of further pieces of work, as detailed below.
- 2.16 The Development Strategy Update document draws together the evidence prepared by independent consultants on Green Belt, Transport, Infrastructure and Viability. 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.
- 2.17 The Councils have carried out or commissioned new 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 Appraisal has also been 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.
- 2.18 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 are proposed to respond to these, one to reduce the size of an allocation in the submitted South Cambridgeshire Local Plan and one provision one to allocate a new employment allocation as an extension to the Cambridge Biomedical Campus.
- 2.19 The evidence also looks at the potential to deliver sustainable new settlements as an alternative to sites on the edge of Cambridge and concludes that they can provide viable and deliverable developments that will be able to contribute to strategic off site infrastructure and provide high quality

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³ RD/Strat/040

public transport links to Cambridge that will attract 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.

2.20 Some key comparisons between edge of Cambridge sites and new settlements are:

Transport:

- 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 areas.

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.
- 2.21 Having weighed all those factors, the 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

- 2.22 In response to the Inspectors' issues about the Councils' 2012 Inner Green Belt Boundary Study⁴, 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.
- 2.23 The detailed findings of this work are set out in the Cambridge Inner Green Belt Study, November 2015 report, which is published alongside this consultation document.
- 2.24 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.
- 2.25 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 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

⁴ RD/Strat/210

are set for any such development to avoid significant harm to the purposes of the Green Belt.

- 2.26 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.
- 2.27 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.
- 2.28 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 which was allocated for development in the Cambridge Local Plan 2006. The site was subject to further assessment by South Cambridgeshire District Council and was 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 modification to the submitted South Cambridgeshire Local Plan.

Infrastructure requirements, viability and sustainable transport options for new settlements

- 2.29 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.
- 2.30 In response to these concerns, a number of additional studies have been undertaken. The Cambridge and South Cambridgeshire Local Plans Viability Update (November 2015)⁵ provides an update of the viability assessments prepared for the Councils⁶ to ensure 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

⁵ RD/MC/090

⁶ RD/Strat/150; RD/H/320; RD/H/340; RD/T/200 and RD/T/220.

Code for Sustainable Homes and different space and accessibility standards. It specifically considers the particular costs associated with new settlements.

- 2.31 Running in parallel to the Viability Update work, the Cambridge and South Cambridgeshire Infrastructure Delivery Study 2015⁷, provides an update to the Cambridge and South Cambridgeshire Infrastructure Delivery Study⁸, 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.
- 2.32 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 CSRM Cambridge and South Cambridgeshire Local Plans Transport Report, November 2015⁹.

Housing Land Supply

- 2.33 Consequential to the work on Housing Needs and Development Strategy, an updated paper on Housing Land Supply has also been prepared. This includes an update on the situation in relation to Land North of Cherry Hinton where discussions with the two promoters of the site demonstrate that a larger part of the land currently 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.
- 2.34 The submitted Local Plans included a provision across both districts of 460 homes, the ongoing work now means 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 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.
- 2.35 The paper also takes a more cautious 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

⁷ RD/MC/080

⁸ RD/T/010 and RD/T/020

⁹ RD/MC/090

housing trajectory shows that the Councils have 5 year housing land supply over the plan period.

Sustainability Appraisal/Strategic Environmental Assessment process

- 2.36 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 Review¹⁰ and the Plans' reliance on meeting development needs in new settlements.
- 2.37 In response to the Inspectors' concerns, a joint addendum to the Councils' Sustainability Appraisals has been 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 NPPF. The addendum also includes an appraisal of all 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 has been undertaken to provide an appropriate level of information so as to facilitate comparative assessment with the proposed new settlements.
- 2.38 The results of this work are set out in the Cambridge and South Cambridgeshire Local Plans Sustainability Appraisal Addendum Report and made available for consultation alongside this document. The findings of the Sustainability Appraisal Addendum Report are not significantly different from those of the appraisals submitted with the Local Plans. 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.

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

2.39 Main modifications to the Cambridge Local Plan are proposed to reflect the earlier Memorandum of Understanding between the Councils (September 2014) for a joint housing trajectory for the Greater Cambridge area (Modification PM/CC/2/H to Policy 3: Spatial strategy for the location of residential development).

¹⁰ RD/Strat/040

2.40 Modifications to policy 12 and supporting text and maps are proposed at Cambridge East - North of Cherry Hinton - to carry forward more of the current allocation continued in the Cambridge East Area Action Plan 2008 than included in the submitted Local Plans given 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 (Modifications PM/CC/3/A, PM/CC/B/A, and PM/CC/Policies Map/A address Policy 12: Cambridge East, Appendix B and the Policies Map of the Cambridge Local Plan respectively).

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

- 2.41 A main modification is 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 (Modification PM/SC/2/S in relation to Policy S/12 Phasing, Delivery and Monitoring).
- 2.42 Main modifications are 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. (Modifications PM/SC/2/O, PM/SC/3/H and PM/SC/3/I in relation to Policy S/6 the Development Strategy to 2031).
- 2.43 Modifications to policies are proposed at Cambridge East North of Cherry Hinton to carry forward more of the current allocation continued in the Cambridge East Area Action Plan 2008 than included in the submitted Local Plans given 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 420 dwellings are in South Cambridgeshire. This also reduces the amount of safeguarded land (Modifications PM/SC/3/A to Policy SS/3 Cambridge East).
- 2.44 A provisional modifications proposes an extension to Cambridge Biomedical Campus, to reflect latest independent Green Belt assessment, subject to further investigation of surface water flooding issues (Provisional Modification PM/SC/8/A).
- 2.45 Reduction in the size of the employment site adjacent to Peterhouse Technology Park, Fulbourn Road, Cambridge, to reflect latest independent Green Belt assessment (Modification PM/SC/8/C relating to Policy E/2 Fulbourn Road East)

Conformity with revisions to National Planning Policy

2.46 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.

- 2.47 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. The Councils have also taken the opportunity to consider a number of other recent changes in national policy and guidance. As a result, an audit of these policies has been undertaken by the Councils, which is set out in the document Proposed Modifications arising from the Government's Written Ministerial Statements¹¹ Where appropriate, modifications to policies have been put forward and appraised as part of the further work on the Sustainability Appraisal and the Viability Update. Modifications are set out in Proposed Modifications arising from the Government's Written Ministerial Statements.
- 2.48 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 consider that further work needs to be undertaken in respect of accessibility. As such, no main modifications are proposed in respect of accessibility standards at this time.
- 2.49 The implications of the Written Ministerial Statement amendments have been considered in the Sustainability Appraisal Addendum. Some of the previous findings of the Appraisal are 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.

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

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

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¹¹ RD/MC/100

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

- 2.51 Changes are proposed to policies relating to climate change, specifically in relation to water efficiency, renewable energy and at the Fen Drayton Land Settlement Association site, the way in which the sustainability credentials of new homes will be judged. This is in the light of amendments to national government policy (Modifications PM/SC/4/C, PM/SC/4/D, and PM/SC/4/E).
- 2.52 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 (Modifications PM/SC/7/A, PM/SC/7/D and PM/SC/7/E).

Proposed Main and Minor Modifications to the Cambridge and South Cambridgeshire Local Plans

The following format has been used to denote modifications:

- <u>Underlined text</u> = new text suggested
- Strikethrough text = text proposed for removal

The modifications are set out in plan order for each Local Plan. Where it has not been possible to show tables within the table, modifications are set out below each Council's respective table of modifications. Minor modifications put forward when the local plans were submitted to the Inspector have been incorporated into these new proposed modifications. These previously submitted minor modifications had their own unique identifying number which is referenced in the reason for proposed modification. These were submitted as part of RD/Sub/C/050 Addendum to the Cambridge Local Plan 2014: Proposed Submission document (July 2013) – Schedule of Proposed Changes following Proposed Submission Consultation March 2014.

The tables also identify whether the modifications are considered to be main or minor modifications. Main modifications are those that materially affect the policies in the submitted Local Plans, which are required to ensure that the plans are sound and legally compliant. Modifications are considered to be minor where they will not impact upon the intent or interpretation of the plans, or go to the heart of whether the plan is 'sound' or not. The minor changes outlined are often made to supporting text and are necessary, due to alterations to associated policy wording in response to changes to national policy as set out in the various Written Ministerial Statements.

The tables include the following information:

Proposed modification number:	Proposed modification number for reference. The reference number is composed as follows Proposed Modification/Section; Appendix number/Unique number for change.
Policy / paragraph	The section of the Cambridge Local Plan 2014: Proposed
number / site	Submission (July 2013) or the South Cambridgeshire
reference:	Local Plan Proposed Submission (July 2013)
Proposed	Details of the proposed amendment
modification	
Reason for proposed	Details of why the change is proposed
modification	
Main/minor	Nature of the modification.
modification	

Appendix A: Proposed modifications to the Cambridge Local Plan 2014: Proposed Submission

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
Section 2: The	Spatial Strategy			
PM/CC/2/A	Figure 2.1: Key Diagram	Amend the key diagram to take account of changes to Cambridge East/land north of Cherry Hinton (see proposed modification PM/CC/3A). See amended Figure 2.1 at the end of this table	To ensure consistency with proposed modifications to policy 12 (PM/CC/3/A). This modification is in addition to PM/2/002.	Minor modification
PM/CC/2/B	Paragraph 2.17	Amend paragraph 2.17 to read: The councils in Cambridgeshire, along with Peterborough City Council have undertaken joint technical work and an update of the strategic housing market assessment (SHMA) for the Cambridge housing market area in order to identify objectively assessed needs for homes and jobs across the sub-region. The councils undertook this work cooperatively and a memorandum of cooperation and joint spatial approach has been agreed. This was published in May 2013. This confirmed Cambridge's need was for 14,000 additional homes and 22,100 jobs between 2011 and 2031. Additional independent technical evidence was prepared in 2015	To reflect updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter regarding Objectively Assessed Need for Housing, and how it was considered by the Councils.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		to further consider need for new housing taking account of national guidance published after the plan was prepared. This has confirmed that the full Objectively Assessed Need for Cambridge is 14,000 homes. This need is being met in full in this new plan.		
PM/CC/2/C	After paragraph 2.17	Add new paragraph 2.17a to read: A Memorandum of Understanding was also agreed between Cambridge City Council and South Cambridgeshire District Council in September 2014, which agrees that the housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development.	Positively prepared and justified. The joint housing trajectory reflects the close functional relationship between the Councils, the joint development strategy and the way that strategy is being built out, in particular that sites on the edge of Cambridge are building out from the built up area in Cambridge and have not yet reached or started building over the administrative boundary is South Cambridgeshire. It is about the phasing of housing delivery, not overall housing provision. Modification relates to the changes required to give effect to the Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). This modification was attached to the Councils' Matter 1 Hearing Statement.	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
			Effective. The Memorandum of Cooperation is made under the Duty to Cooperate as part of the Councils working closely together to ensure delivery of suitable development to meet their objectively assessed needs. Consistent with national policy. National	
			policy requires Councils to meet their objectively assessed needs and national practice guidance allows for Councils "to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.	
PM/CC/2/D	Paragraph 2.27	Insert new sentence at the end of paragraph 2.27 to read: This approach has been endorsed by the Joint Strategic Transport and Spatial Planning Group (JST&SPG), the member governance group set up to guide the collaborative preparation of development plans in Cambridge and South Cambridgeshire and the associated transport strategy. This group has also considered the additional evidence prepared in 2015.	· · · · · · · · · · · · · · · · · · ·	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
PM/CC/2/E	After paragraph 2.29	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 also 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.	To reflect the updated Local Plan evidence prepared in 2015 in response to the Inspectors letter.	Minor modification
PM/CC/2/F	Paragraph 2.30	Insert new sentence on the end of paragraph 2.30 to read: The conclusion of the consideration of reasonable site options for development on the edge of Cambridge is to require development away from the edge of Cambridge to meet the remaining development needs of the wider Cambridge area. The sustainability appraisal of broad locations undertaken as part of the joint work endorsed by the	prepared in 2015 in response to the Inspectors letter.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		JST&SPG demonstrates clearly that new settlements are the next most sustainable location for growth and that development in villages should be limited for sustainability reasons. This appraisal was updated in 2015, to take account of new evidence prepared in response to the Inspectors during the Local Plan Examination.		
PM/CC/2/G	Table 2.2	Amend figures in Table 2.2 as shown on at the end of this table.	To update the housing land supply position, reflecting the latest monitoring information, changes in the anticipated delivery rates on major sites, and modifications proposed elsewhere in this schedule.	Minor modification
PM/CC/2/H	Policy 3: Spatial strategy for the location of residential development.	Amend the second paragraph of Policy 3 to read: Provision will be made for the development of not less than 14,000 additional dwellings within Cambridge City Council's administrative boundary over the period from April 2011 to March 2031 to meet the objectively assessed need for homes in Cambridge. This will enable continuous delivery of housing for at least 15 years from the anticipated date of adoption of this local plan. The housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered	Positively prepared and justified. The joint housing trajectory reflects the close functional relationship between the Councils, the joint development strategy and the way that strategy is being built out, in particular that sites on the edge of Cambridge are building out from the built up area in Cambridge and have not yet reached or started building over the administrative boundary is South Cambridgeshire. It is about the phasing of housing delivery, not overall housing provision. Modification relates to the changes required to give effect to the Memorandum of Understanding between Cambridge City Council and South	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		together for the purposes of phasing and housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development. This pProvision includes two small sites to be released from the Cambridge Green Belt at Worts' Causeway, which will deliver up to 430 dwellings.	Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). This modification was attached to the Councils' Matter 1 Hearing Statement. Effective. The Memorandum of Cooperation is made under the Duty to Cooperate as part of the Councils working closely together to ensure delivery of suitable development to meet their objectively assessed needs. Consistent with national policy. National policy requires Councils to meet their objectively assessed needs and national practice guidance allows for Councils "to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5	
			years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.	
PM/CC/2/I	Paragraph 2.43	Amend paragraph 2.43 to read: As of April 2012 2015, there is planning permission for 9,385 7,036 new homes within the urban area and in the agreed urban extensions. There are a further 721 1,010 planned dwellings on existing	To update the housing land supply position reflecting the latest monitoring information, changes in the anticipated delivery rates on major sites and modifications proposed elsewhere in the schedule. This modification supersedes proposed modification PM/2/006.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		allocated sites that do not have planning permission. Completions between 2011/12 and 2012 2014/15 account for 331 2,860 dwellings. In addition, the Council's strategic housing land availability assessment (SHLAA), together with findings of the council's annual housing trajectory which assesses the capacity for future housing within the existing urban area, indicates capacity for a further 3,754 3,777 dwellings in the urban area of Cambridge (including two small Green Belt releases). Taken together, these could provide 14,191 14,682 new homes for Cambridge over the local plan period (See Table 2.3 – Housing provision to 2031).		
PM/CC/2/J	Table 2.3	Replace current Table 2.3 with amended Table 2.3 as shown at the end of this table.	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter, and how it was considered by the Councils. This proposed modification supersedes proposed modification PM/2/007.	Minor modification
PM/CC/2/K	Paragraph 2.45	Amend paragraph 2.45 to read: The Cambridge housing trajectory included and updated each year in the Annual Monitoring Report set out in Figure 2.2 illustrates the expected rate of delivery of new dwellings. It demonstrates how the	Modification relates to changes required to reflect the Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). This modification was attached to the Councils'	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		objectively assessed need for an additional 14,000 homes to 2031 could be achieved. To meet objectively assessed need, an average of 700 additional dwellings a year are required between 2011 and 2031. As outlined in paragraph 2.17a, the Councils have agreed that the housing trajectories for both areas be considered together for the purposes of housing delivery, including calculation of 5-year housing land supply in development management decisions that concern housing development. This is consistent with the development sequence and spatial development strategy for Cambridge and South Cambridgeshire, and the phasing of housing delivery reflecting that strategy. As such, sites at the top of the development sequence in and on the edge of the urban area of Cambridge will deliver in the early and middle part of the plan period. Delivery in South Cambridgeshire will be greater in the middle and latter parts of the plan period, in particular as the fringe sites build out from the edge of Cambridge and move across the administrative boundary into South Cambridgeshire and as the new settlements come forward. There will also be some housing in larger villages early in the plan period.	Matter 1 Hearing Statement	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
PM/CC/2/L	Paragraphs 2.46, 2.47 and Figure 2.2: Housing trajectory	Delete paragraphs 2.46, 2.47 and Figure 2.2: Housing Trajectory 2.41 All dwelling figures in the trajectory are net additional dwellings (i.e. completed dwellings minus losses of dwellings). The yellow horizontal line at 700 dwellings represents the annual average requirement. 2.42 The maroon bars illustrate the projected net completions on sites that are currently known (i.e. existing commitments). The light blue bars represent total net additional dwellings including local plan allocations and windfall sites.	Modification relates to changes required to reflect the Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). This modification was attached to the Councils' Matter 1 Hearing Statement.	Main modification
PM/CC/2/M	Figure 2.2 Housing Trajectory	Delete Figure 2.2: Housing Trajectory (see the end of this schedule for the figure)	To reflect the proposed modification to Policy 3 (PM/CC/2/). The trajectory in the Submitted Plan is now out of date. It is proposed to not include a replacement, but instead utilise the updated trajectories which are published annually in the Councils Annual Monitoring Reports. This proposed modification supersedes proposed modification PM/2/008	Main modification
PM/CC/2/N	Paragraph 2.48	Amend paragraph numbering and paragraph to read:	Modification relates to changes required to reflect the Memorandum of Understanding between Cambridge City Council and South	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		The trajectory relies trajectories rely on information about sites that have the potential to deliver dwellings over the next 15 years and beyond, taken from the strategic housing land availability assessment (SHLAA) and work on local plan allocation sites.	Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). This modification was attached to the Councils'	
Section 3: City	centre, areas of n	najor change, opportunity areas and site sp	ecific proposals.	
PM/CC/3/A	Policy 12: Cambridge East	Delete current policy wording and replace with the following: Policy 12: Cambridge East 1. Land at Cambridge East is allocated for development as shown on the Policies Map: a) Land north of Newmarket Road during the plan period (R45).	Positively prepared and justified. It would not be positive, reasonable or appropriate for the Local Plans to convert an existing allocation to safeguarded land if it can reasonably be brought forward for development to help meet objectively assessed development requirements whilst the airport remains in operation. The exact boundary of the land that could be developed north of Cherry Hinton is more extensive than is currently allocated for	Main modification
		 b) Land north of Coldham's Lane for residential during the plan period (R41). c) Land north of Cherry Hinton (R47) for approximately 780 dwellings during the plan period (along with adjoining land allocated in Policy SS/3 of the South Cambridgeshire 	development in the Local Plans. Effective. The landowners both agree that additional land north of Cherry Hinton is deliverable over the plan period. The Councils are working closely together to ensure delivery of the maximum area of land appropriate with the Airport remaining	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		Local Plan for approximately 420 dwellings). 2. Proposals for residential development on sites a), b), and c) as shown on the Policies Map, will be supported if: d) acceptable mitigation of environmental and health impacts (including noise) from the airport can be provided; and e) A masterplan is submitted for the development of site R47 and adjoining land in South Cambridgeshire which safeguards the appropriate future development of the wider safeguarded land; and f) the continued authorised use of Cambridge Airport does not pose a safety risk. 3. The masterplan for site R47, as shown on the Policies Map (together with adjoining land in South Cambridgeshire on site SS/3), will make provision for a primary and secondary school, a local centre with community hub, open space and a spine road connecting Coldham's Lane with Cherry Hinton Road.	operational, consistent with the objectives of the AAP and the submitted Local Plans. Consistent with national policy. The land is highly sustainable being on the edge of Cambridge and not in the Green Belt, having been released from the Green Belt in the current adopted plans for development.	

		4. The rest of the Cambridge East site is		
	Paragraph 3.15	safeguarded for longer term development beyond 2031. Development on safeguarded land will only occur once the site becomes available and following a review of both this plan and the Cambridge East Area Action Plan. 5. This policy replaces Policies CE/3 and CE/35 of the Cambridge East AAP. All other policies in the Cambridge East AAP are retained. Amend to read: Land at Cambridge East was taken out of the Green Belt through the Cambridge Local Plan 2006 and Cambridge East Area Action Plan (AAP) 2008 for the development of a major new urban extension to the city. This was dependent on the relocation of current activities at the airport. The Marshall Group had been actively looking into relocation options for the airport activities since 2006. In 2010,	To ensure consistency with proposed modifications to policy 12 (PM/CC/3/A)	Minor modification
PM/CC/3/C	Paragraph	they announced that they did not have a deliverable relocation option and they intended to remain at Cambridge Airport for the foreseeable future. Amend to read:	To ensure consistency with proposed	Minor

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
	3.16	In reviewing the future options for this large site, Cambridge City Council and South Cambridgeshire District Council have concluded that it is appropriate that this the site allocated in the AAP remain out of the Green Belt. and be safeguarded as a strategic reserve of land to be developed at a later date. The corridor of Green Belt running from Coldham's Common to Teversham will remain as Green Belt. Policies in the existing Cambridge East AAP will remain other than policies CE/3 and CE/35. For areas within Cambridge City Council's administrative area, this policy replaces both policies CE/3 and CE/35. This policy safeguards the main airport site for longer term development needs beyond 2031. If circumstances changed, a review of this policy and the AAP could examine the consequences of the change in circumstances.	modifications to policy 12 (PM/CC/3/A)	modification
PM/CC/3/D	Paragraph 3.17	Amend to read: There is potential for residential development on several smaller parcels of land There is an opportunity during the plan period to deliver residential development on parts of Cambridge East while the airport remains on the site. A	To ensure consistency with proposed modifications to policy 12 (PM/CC/3/A)	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		number of specific sites and a broad location South of the Green Corridor are		
		allocated in Policy 12 (1) and Policy SS/3		
		(1) of the South Cambridgeshire Local Plan		
		(see Figure 3.2). These were identified in		
		the AAP as capable of coming forward		
		ahead of the Airport site, and potentially		
		without it. Careful consideration of how the		
		ongoing airport activities will interact with		
		any new residential use will need to be		
		undertaken at the planning application		
		stage, to ensure that the new residences		
		have an acceptable level of amenity, and		
		that they do not impede on the ongoing		
		use of the airport. In terms of how any		
		development might impede use of the		
		airport, it will be for the airport operators to		
		demonstrate how the development does		
		this. Any development that comes forward		
		in advance of the wider site will have to be		
		carefully planned so that it is capable of		
		working both with and without the wider		
		development, so as not to prejudice the		
		potential delivery of development on the		
		safeguarded land at some point in the		
		future if it becomes available. This policy		
		makes it clear that these areas are not part		
		of the wider safeguarded site and could		
		come forward for development before 2031. A masterplan for site R47 and		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		adjoining land in South Cambridgeshire will be required in order to ensure a comprehensive and coordinated approach to bringing these sites forward for development., if the site becomes available and following a review of the Cambridge East AAP.		
PM/CC/3/E	Insert two new paragraphs after paragraph 3.17	3.18 Cambridge City Council and South Cambridgeshire District Council accept that there is an existing need for a new secondary school to serve the eastern part of Cambridge in response to demographic pressures. 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 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, including land for the provision of a secondary school being made available. As an exception to policy CE/6 of the Cambridge East AAP, the secondary	To ensure consistency with proposed modifications to policy 12 (PM/CC/3/A)	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		school need not be included in the local centre. In common with practice elsewhere around Cambridge and in line with national policy on Green Belt, it will be acceptable for school playing fields to be located in the retained Green Belt.		
		3.19 This policy safeguards the main airport site for longer-term development needs beyond 2031. Were circumstances to change, a review of this Plan and the Cambridge East AAP could examine the consequences of the change. Policies in the existing Cambridge East AAP will remain other than Policies CE/3 and CE/35.		
PM/CC/3/F	Figure 3.2	Insert amended Figure 3.2 as shown at the end of this schedule	To ensure consistency with proposed modifications to policy 12 (PM/CC/3/A)	Minor modification
Section 4: Resp	onding to climate	e change and managing resources	· · · · · · · · · · · · · · · · · · ·	
PM/CC/4/A	Policy 27: Carbon reduction, community energy networks, sustainable design and construction and water use	See revised policy wording at the end of this schedule. (This policy includes an amended table, which does not function effectively within the modifications table). These proposed modifications incorporate previous modifications reference PM/4/001, PM/4/002 and PM/4/003	As a result of the Housing Standards Review and the associated Written Ministerial Statement published on 25 March 2015, the following changes to the policy are required to ensure that the plan is consistent with changes to national planning policy: Removal of requirements related to the achievement of the Code for Sustainable Homes for new residential development. As a result of the	Main modification

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			Housing Standards Review, the Code has now been abolished and Local Planning Authorities are no longer able to set specific construction standards for residential development. • Amendment of the water efficiency standard to reflect the new national technical standard of 110 litres/person/day, giving consideration to the requirements set out in paragraph 56-015-20150327 of the Planning Practice Guidance related to evidence of need. The Council is seeking to implement the new national standard given the levels of water stress facing the city, as set out in the Cambridge Water Company Resources Management Plan (RD/CC/100 and RD/CC/090) and the evidence contained in the Council's audit trail (RD/Sub/C/080, pages 281 - 283). In order to secure long term sustainable development, it will be important to ensure that all new development implements water efficiency measures. This level of water efficiency has been subject to viability testing as part of the Councils' updated Viability work and has been found to be viable. It should, however,	

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			be noted that concern remains that the level associated with the national technical standard may not be sufficient to ensure a long-term sustainable supply of water, which has the potential to affect the levels of growth sought through the plan bearing in mind the requirements set out in paragraph 162 of the NPPF. This paragraph requires local planning authorities to work with other authorities and providers to assess various types of infrastructure, including water supply, and its ability to meet forecast demands. The approach previously put forward in the Cambridge Local Plan 2014: Proposed Submission was considered to be the only approach that would ensure that there would be a sustainable supply of water post 2031, in line with the findings of Cambridge Water's Resource Management Plan. Indeed at the Issues and Options Stage, Cambridge Water objected to all other levels of water efficiency on the basis that these would not be sufficient to ensure sustainability of supply. The level of water efficiency originally sought through the Cambridge Local	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
			Plan 2014: Proposed Submission (80 litres/person/day) had been found to be viable through the Council's viability work (RD/T/200) and had the full support of Cambridge Water, Anglian Water and the Environment Agency. In light of the water stress issues facing Cambridge, the Council considers it important that flexibility be included within the plan so that should changes to the national technical standards enable the setting of more stringent water efficiency requirements, this should be able to come forward. Appropriate wording is suggested above at paragraph 4.9. In terms of energy performance in new dwellings, the Written Ministerial Statement makes it clear that local planning authorities are able to continue to set energy performance standards that exceed the requirements of Building Regulations until the commencement of the amendments to the Planning and Energy Act 2008. These standards should be set at a level equivalent to the energy performance requirements of Level 4 of the Code for Sustainable Homes. As such, it is suggested that	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
			the existing policy wording of Policy 27 be retained in so far as it requires energy performance/carbon reduction associated with Code Level 4 up until 2016 and that these standards continue to be sought post 2016, with reference made in the policy to them remaining in place until commencement of the amendments to Section (1) (c) of the Planning and Energy Act 2008. This is in light of evidence contained in the Decarbonising Cambridge Study (RD/CC/250) and the Council's viability work (RD/T/200) that this standard was both technically feasible and viable.	
			Given the announcement to postpone national zero carbon policy for new non-residential development from 2019, modifications are also proposed to the carbon reduction being sought for new non-residential development. It is proposed that given BREEAM 'excellent' is being proposed as the construction standard for such development, which includes minimum standards related to reduction of energy use and carbon emissions, these minimum standards are	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
			referenced in this policy rather than referring to Building Regulations, which will now not be changed. This approach also satisfies a representation made by the University of Cambridge in their response to the Proposed Submission Local Plan (representation number 26620).	
			All other aspects of the policy are retained as these are not directly impacted by the Housing Standards Review or Written Ministerial Statements and play an important role in enabling applicants to demonstrate how their proposals meet the principle of sustainable development. In addition some elements of the policy relate to specific legal duties placed on local planning authorities, for example the requirements set out in the Planning Act related to climate change adaptation and mitigation and the requirement set out in paragraph 94 of the NPPF which requires local planning authorities to adopt "proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations".	
PM/CC/4/B	Table 4.1	Amend table to remove references to the Code for Sustainable Homes	Modification required to ensure that the supporting text is consistent with the	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		Note this modification incorporates previous modifications put forward for this table (PM/4/004).	proposed modifications to policy 27 (PM/CC/4/A).	
PM/CC/4/C	Paragraph 4.6	Amend the first sentence of this paragraph to read: This policy also sets out requirements in relation to sustainable construction standards, and carbon reduction for non-residential development and water efficiency for both residential and non-residential development.	Modification required to ensure that the supporting text is consistent with the proposed modifications to policy 27 (PM/CC/4/A).	Minor modification
PM/CC/4/D	Paragraph 4.7	Amend to read: Nationally described sustainable construction standards have been developed for new homes (the Code for Sustainable Homes, CfSH) and new non-residential buildings (the BRE Environmental Assessment Method, BREEAM). Alongside these standards sits the Government's zero carbon policy agenda, which requires all new homes to be zero carbon by 2016, and all non-residential buildings to be zero carbon by 2019, with public buildings leading the way in 2018.	Modification required to ensure that the supporting text is consistent with the proposed modifications to policy 27 (PM/CC/4/A).	Minor modification
PM/CC/4/E	Paragraph 4.8	Amend to read:	Modification required to ensure that the supporting text is consistent with the	

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		There are many approaches that can be taken to meeting the construction standards required by this policy, including construction methods such as Passivhaus Standard. The Council will be supportive of innovative approaches to meeting and exceeding the standards set out in the policy. Where other construction standards are proposed for new developments, for example Leadership in Energy and Environmental Design (LEED), these will be supported, provided that it can be demonstrated that they are broadly in line with the standards set out above, particularly in relation to carbon reduction and water efficiency. While there are no nationally described standards for residential development, the Council will be supportive of schemes that seek to utilise standards such as the BRE's Home Quality Mark, the Passivhaus Standard or Leadership in Energy and Environmental Design (LEED). The development of bespoke standards for new housing and non-residential development would also be supported.	proposed modifications to policy 27 (PM/CC/4/A).	
PM/CC/4/F	Paragraph 4.9	Amend to read: It may be possible in some areas for development to exceed the policy	' '	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		requirements set out above. For example, developments located within the strategic district heating area may be able to achieve higher levels of carbon reduction than set out in policy, which in turn could lead to higher construction standards being achievable. In order to maximise opportunities to exceed minimum policy requirements, developers will be encouraged to engage with the Council from an early stage through preapplication discussions. The policy will also be reviewed periodically so that it can be updated to reflect any significant changes to construction standards and the national technical standards.		
PM/CC/4/G	Paragraph 4.10	Delete the paragraph: Where redevelopment/refurbishment of existing buildings is proposed, the development of bespoke assessment methodologies to assess the environmental impact of the proposals for submission with the planning application will be supported.	Modification required to ensure that the supporting text is consistent with the proposed modifications to policy 27 (PM/4/A). This modification was proposed as PM/4/003 as part of the Addendum to the Cambridge Local Plan 2014: Proposed Submission document (July 2013) – Schedule of Proposed Changes following Proposed Submission Consultation (RD/Sub/C/050)	Minor modification
PM/CC/4/H	Policy 28: Allowable Solutions for zero carbon	Delete policy and supporting text in their entirety	As part of the 2015 budget, the Treasury published a document called Fixing the Foundations: Creating a more prosperous nation. As part of this, the Government	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
	development Supporting text paragraphs 4.13 – 4.16		announced that it did not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme. As such, the Council proposes the deletion of policy 28, which was based on the introduction of Allowable Solutions as part of national zero carbon policy in 2016. This modification is required to ensure that the plan is consistent with changes to national planning policy.	
PM/CC/4/I	Policy 29: Renewable and low carbon energy generation	Amend to read: Proposals for development involving the provision of renewable and/or low carbon energy generation, including community energy projects, will be supported, subject to the acceptability of their wider impacts. As part of such proposals, the following should be demonstrated: a. that any adverse impacts on the environment, including local amenity and impacts on the historic	 On 18 June 2015, the Government published a Written Statement on proposed wind energy development, which signalled a change in direction to the determination of planning applications for onshore wind. This statement sets out that when determining planning applications for one or more wind turbine, permission should only be granted where: The development site is in an area for wind energy development in a Local or Neighbourhood Plan; and 	Main modification
		environment and the setting of heritage assets, have been minimised as far as possible. These considerations will include air quality concerns, particularly where proposals fall within or close to the air quality management area(s) or areas where air pollution levels are	Following consultation, it can be clearly demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		well as noise issues associated with certain renewable and low carbon technologies; and b. that where any localised adverse environmental effects remain, these are outweighed by the wider environmental, economic or social benefits of the scheme. Note that this policy does not apply to applications for wind turbines, which would be considered against the requirements set out in the Local Planning Written Ministerial Statement, dated 18 June 2015.	As such the proposed modification is required to ensure that the plan is consistent with changes to national planning policy. While the Council is supportive of all forms of renewable energy, the technical assessment of renewable energy capacity included within the Decarbonising Cambridge 12 study highlights that the wind resource in Cambridge is highly constrained due to the relatively modest raw resource and the urban characteristics of the area. As such, the Council proposes modifications to Policy 29 and the addition of a new paragraph after paragraph 4.21 to clarify the situation regarding wind turbines. The Council is not, at this stage, seeking to allocate any sites in the local plan for wind turbine development. This approach will be reviewed as part of subsequent Local Plans.	
PM/CC/4/J	Insert new paragraph after 4.21	Insert the following new paragraph: The wind resource in Cambridge is highly constrained due to the relatively modest raw resource and the urban characteristics of the area. To this end, this Local Plan	Modification required to ensure that the supporting text is consistent with the proposed modification to Policy 29 (PM/CC/4/I).	Minor modification

¹² RD/CC/250 – Element Energy (2010). Decarbonising Cambridge: A renewable and low carbon energy study for Cambridge City Council.

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		does not seek to allocate areas of land as being suitable for wind turbines. This approach will be reviewed as part of any subsequent review of the Local Plan.		
Section 5: Supp	orting the Cambi			1
PM/CC/5/A	Paragraph 5.18	Add the following sentence to the end of the paragraph: This policy only seeks to protect employment uses from change of use where a planning application (including variation of condition) is required.	On 25 March 2015, the Government published a Written Ministerial Statement which made reference to change of use: supporting brownfield regeneration. In the light of this Written Ministerial Statement and a number of changes which the Government has made to the General Permitted Development Order since this policy was originally drafted, the Council is proposing a modification to paragraph 5.18 of the supporting text to Policy 41: Protection of business space to clarify when this policy is to be applied and to ensure consistency with permitted development rights.	
	taining a balance	d supply of housing		
PM/CC/6/A	Policy 45: Affordable housing and dwelling mix	Amend to read: Planning permission will only be granted for residential development on sites with capacity for between 2 and 9 dwellings, if provision is made for a minimum of 10 per cent affordable housing. On such sites, financial contributions towards affordable	c. Part of this modification is suggested for clarity and was proposed as PM/6/001 as part of the Addendum to the Cambridge Local Plan 2014: Proposed Submission document (July 2013) – Schedule of Proposed Changes following Proposed Submission Consultation (RD/Sub/C/050).	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		housing off-site are considered acceptable. This does not prohibit on-site provision of affordable housing on sites of this scale, but recognises that circumstances may often not allow for delivery on-site. Planning permission will only be granted for residential development on sites with capacity for between 10 and 14 dwellings or on sites of between 0.3 and 0.49 hectares, if provision is made for a minimum of 25 per cent affordable housing on-site. Furthermore, planning permission will only be granted for residential development on sites with capacity for 15 dwellings or more or on sites of 0.5 hectares or more, if provision is made for a minimum of 40 per cent affordable housing on-site. Planning permission will only be granted for residential development on sites where the minimum percentage of affordable housing has been secured on site in line with the thresholds and percentages set out in the table below:	d. e. This main modification to the penultimate paragraph of Policy 45 indicates that Starter Homes Exceptions Sites are not expected to deliver affordable housing in accordance with the 2 March 2015 Written Ministerial Statement on Starter Homes. This modification is therefore required to ensure that the plan is consistent with changes to national planning policy.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		No. of dwellings Minimum percent affordable housing required		
		2 -9 units 10% 10-14 units 25%		
		10-14 units 25% 15 or more units 40%		
		On sites capable of delivering between 2 and 9 dwellings, financial contributions towards the provision of affordable housing off-site are considered acceptable. This does not prohibit on-site provision of affordable housing on sites of this scale, but recognises that circumstances may often not allow for delivery on-site.		
		Where it appears that a larger site has been subdivided into smaller development parcels in order to circumvent the requirements of this policy, or for any other reason, the threshold and the prorata percentage of affordable housing sought will apply to the requirement from the larger area as a whole. The required		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		regard to its wider context and other policies of this plan.		
		The occupation of affordable housing will be limited to people in housing need and shall be available in perpetuity. Affordable housing shall be provided on development sites with the capacity of 10 dwellings or more in accordance with the percentages and thresholds set out above unless exceptional circumstances are demonstrated. Where affordable housing is provided, it shall be of tenure blind design indiscernible from and well integrated with the general market housing.		
		Developments should include a balanced mix of dwelling sizes*, types and tenures to meet projected future household needs within Cambridge. The mix of dwellings and tenure types shall have regard to the differing needs for different unit sizes of affordable housing and market housing. and to the council's Affordable Housing Supplementary Planning Document in force at the time planning permission is applied for.		
		All sites** including employment related housing will be required to make affordable		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		housing provision in line with the thresholds and percentages set out above. Further details on the practical implementation of this policy will be set out in an up to date Affordable Housing Supplementary Planning Document.		
		*Measured by the number of bedrooms to be provided in each dwelling. ** Except for Starter Homes Exception Sites		
PM/CC/6/B	Paragraph 6.14	Amend to read: Evidence must be provided as a part of the application to show a linkage with at least one higher or further education institution. This policy only applies in instances where planning permission is required for development housing more than six students (sui generis). It is accepted that, due to the relatively short lifespan of tenancies and the lifestyle of student occupants, different amenity standards should apply from those for permanent accommodation. However, student accommodation should still be well designed, providing appropriate space standards and facilities Student accommodation should be well designed, providing appropriate space standards and	f. Part of this modification is suggested in response to a representation and to ensure clarity and was proposed as PM/6/005 as part of the Addendum to the Cambridge Local Plan 2014: Proposed Submission document (July 2013) – Schedule of Proposed Changes following Proposed Submission Consultation (RD/Sub/C/050). g. On 25 March 2015, the Government published a Written Ministerial Statement in respect of space standards following the Housing Standards Review. This statement introduced the Government's Optional Technical Standard for internal space standards (Paragraphs 56-018-20150327 –	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
		will need to reflect the location and scale of the proposal. Provision should be made for disabled students. The ability to accommodate disabled students should be fully integrated into any student housing development, in keeping with the requirements of Policy 51.		
			h. Purpose-built student accommodation is dealt with in Volume 2 of Part M: Access to and use of buildings other than dwellings. Student accommodation is viewed as hotel/motel accommodation in Building Regulations and	

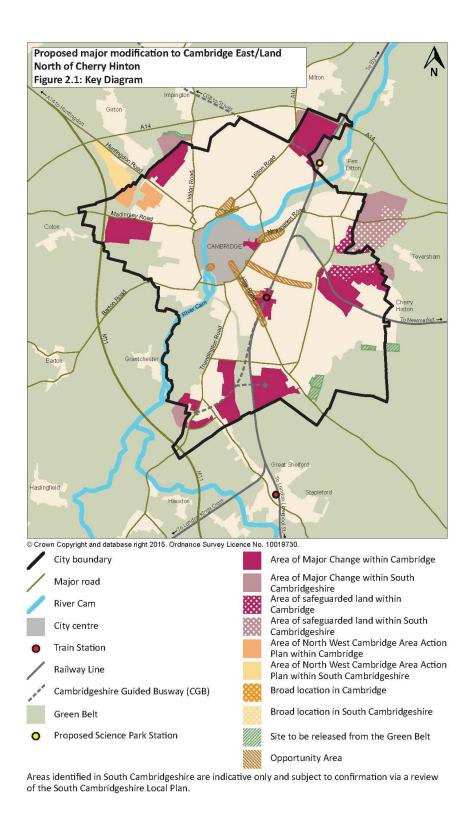
Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
			as such the new technical standard for accessibility contained within Volume 1 of Part M cannot be applied to this kind of unit. The modifications proposed reflect this change in Building Regulations.	
PM/CC/6/C	Paragraph 6.22	Amend to read: It is also important to ensure that HMOs provide a standard of accommodation equivalent to that enjoyed by other residents and that the amount of activity generated by the proposed level of occupation does not detract from the amenities of neighbouring occupiers. The criteria for Lifetime Homes will therefore be applied to proposals for change of use to HMOs., and minimum space standards for development should also be aspired to in the provision of new HMOs. The application of the space standards will help to determine the number of occupiers that a property can reasonably accommodate as a HMO. This not only ensures reasonable living conditions for occupiers, but will also ensure that the intensification of such activity associated with any HMO is proportionate to the size of the property.	On 25 March 2015, the Government published a Written Ministerial Statement in respect of space standards following the Housing Standards Review. This statement introduced the Government's Optional Technical Standard for internal space standards (Paragraphs 56-018-20150327 – 056-022-20150327 of the National Planning Practice Guidance and the Technical housing standards – nationally described space standard document). In respect of the change in black underlined and strikethrough text, as a result of the introduction of the Government's Optional Technical Standard for internal space standards, the Government has clarified that housing in multiple occupation (C4 or Sui Generis) not viewed as a dwelling for the purposes of implementing the standard. As such, the reference to any particular space standard is removed to ensure clarification and consistency with national planning policy.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
			Government's accessibility standard and may provide further modifications relating to Policy 51 and supporting text, including paragraph 6.22 relating to HMOs at a later stage of the examination.	
PM/CC/6/D	Policy 50: Residential space standards	See revised policy wording at the end of this schedule.	On 25 March 2015, the Government published a Written Ministerial Statement in respect of space standards following the Housing Standards Review. This statement introduced the Government's Optional Technical Standard for internal space standards (Paragraphs 56-018-20150327 – 056-022-20150327 of the National Planning Practice Guidance and the Technical housing standards – nationally described space standard document). The changes in black underlined and strikethrough text are provided as a result of the introduction of the Government's Optional Technical Standard for internal	Main modification
			space standards, which replaces the Council's proposed residential space standards. These modifications are required to ensure that the plan is consistent with changes to national policy. For detailed commentary on proposed modifications, see the end of this schedule.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification			
	Appendix B: Proposals schedule						
PM/CC/B/A	Site R40	Delete current proposed allocation for site R40. Insert new row for site R47, which incorporates R40 and other land released for development as part of the Cambridge East Area Action Plan. See extract of the proposals schedule at the end of this schedule.	Positively prepared and justified. It would not be positive, reasonable or appropriate for the Local Plans to convert an existing allocation to safeguarded land if it can reasonably be brought forward for development to help meet objectively assessed development requirements whilst the airport remains in operation. The exact boundary of the land that could be developed north of Cherry Hinton is more extensive than is currently allocated for development in the Local Plans. Effective. The landowners both agree that additional land north of Cherry Hinton is deliverable over the plan period. The Councils are working closely together to ensure delivery of the maximum area of land appropriate with the Airport remaining operational, consistent with the objectives of the AAP and the submitted Local Plans. Consistent with national policy. The land is highly sustainable being on the edge of Cambridge and not in the Green Belt, having been released from the Green Belt in the current adopted plans for development.	Main modification			

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the Cambridge Local Plan	Reason for proposed modification	Main / minor modification
Policies Map				
PM/CC/Policies Map/A		Increase the size of the current allocation for R40 as shown in the Policies Map extract at the end of this schedule and rename site R47.	To ensure that the policies map is consistent with proposed modifications to Policy 12.	Main modification
		The amendments to the map legend include two changes to refer to a proposed extension to areas of major change and new proposals sites.		

Proposed Modifications to Figure 2.1: Key Diagram (PM/CC/2/A) of the Cambridge Local Plan 2014: Proposed Submission



Proposed Modification to Table 2.2: 2031 strategy approach (PM/CC/2/G) of the Cambridge Local Plan 2014: Proposed Submission

	Structure Plan 1999 to 2016	%	New Local Plan Strategy 2011 to 2031 (both areas)	%
Cambridge Urban Area	8,900	27	6,611 <u>6,828</u>	20 19
Cambridge Fringe Sites	8,000	25	11,891 12,670	35
New settlements	6,000	18	10,335 <u>8,055</u>	31 23
Villages	9,600	30	4,748 <u>8,220</u>	14 <u>23</u>
TOTAL 1999 to 2016	32,500	100	33,585 - <u>35,773</u>	100

Proposed Modification to Table 2.3: Housing Provision to 2031 (PM/CC/2/J) of the Cambridge Local Plan 2014: Proposed Submission

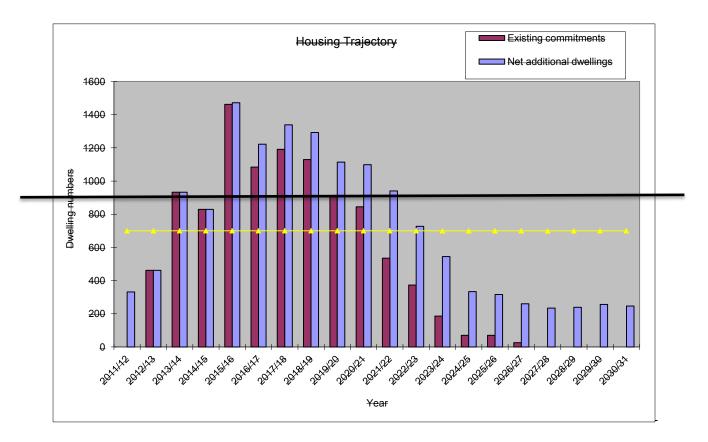
Replace Table 2.3 with the following:

Dwelling provision 2011 to 2031	Number of
	dwellings
Completions	
Completions 2011 - 2012	331
Existing Commitments	
Urban extensions with planning permission	7,000
Urban extensions without planning	408
permission	400
Large allocations with planning permission	1,563
Allocated sites without planning permission	721
Deliverable sites with planning permission	414
(not allocated)	414
Potential supply	
Local plan review allocation sites	1,904
Windfall	1,850
Total	14,191
Surplus	191

	Existing Completions and Commitments (both areas)	New Sites Cambridge	New Sites South Cambs	TOTAL	<u>%</u>
Cambridge Urban Area	<u>5,358</u>	<u>1,470</u>	<u>0</u>	6,611 6,282	20 -19
Edge of Cambridge	<u>11,370</u>	<u>890</u>	100-4 10	<u>11,891</u> 12,670	<u>35</u>
New Settlements and Cambourne West	<u>5,965-3,445</u>	<u>0</u>	4,370 4,610	10,335 8,055	31 -23
Villages Rural Area (including windfalls)	<u>3,853</u> -7,284	<u>0</u>	895 936	4,748 8,220	<u>14-23</u>
TOTAL	24,466- 27,457	3,754 2,360	<u>5,365</u> 5,956	33,585 35,773	<u>100</u>

Proposed Modification to Figure 2.2: Housing Trajectory (PM/CC/2/M) of the Cambridge Local Plan 2014: Proposed Submission

Delete Figure 2.2 as follows:



Proposed Modifications to Policy 27 (PM/CC/4/A) and Table 4.1 (PM/CC/4/B) of the Cambridge Local Plan 2014: Proposed Submission

Policy 27: Carbon reduction, community energy networks, sustainable design and construction, and water use

All development should take the available opportunities to integrate the principles of sustainable design and construction into the design of proposals. Promoters of major development, including redevelopment of existing floor space, should prepare a sustainability statement as part of the design and access statement submitted with their planning application, outlining their approach to the following issues:

- a. adaptation to climate change
- b. carbon reduction
- c. water management
- d. site waste management
- e. use of materials

In order to ensure that the growth of Cambridge supports the achievement of national carbon reduction targets, and does not exacerbate Cambridge's severe water stress, all new development will be required to meet the following minimum standards of sustainable construction, carbon reduction and water efficiency, unless it can be demonstrated that such provision is not technically or economically viable:

New homes:

Year <u>*</u>	Minimum Code for Sustainable Homes standard	On-site reduction of regulated carbon emissions relative to Part L 2006	Water efficiency
2014	Level 4	44%	80 litres/head/day 110 litres/person/day
2016	Level 4	44% - note this requirement will only apply until commencement of the amendments to Section (1) (c) of	80 litres/head/day 110 litres/person/day

	the Planning and	
	Energy Act 2008-	
+	60% on-site, with	
	remainder dealt	
1	with through	
;	allowable	
	solutions (as per	
+	national zero	
	carbon policy)	

New non-residential development:

Year*	Minimum BREEAM Level	On-Site carbon reduction	Water efficiency
2014	Very good	In line with 2013 2014 Part L	Full credits to be achieved for category Wat 01 of BREEAM
2016 onwards	Excellent	In line with 2016 Part L In line with the minimum requirements associated with BREEAM 'excellent'	Full credits to be achieved for category Wat 01 of BREEAM
2019	Excellent	In line with national zero carbon policy	Full credits to be achieved for category Wat 01 of BREEAM

* Application subject to financial year

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.

In order to promote the use of community energy networks, a strategic district heating area is shown on the policies map. Major development proposals within this area should where possible connect to existing heat networks or networks under construction. This requirement will be relaxed if applicants can provide evidence that doing so would affect the viability of schemes. The Council will also be supportive of the future-proofing of developments so that they are capable of connecting to future heat networks.

Table 4.1: Areas to be covered in the sustainability statement

Issue:	Recommended approach				
Aim/objective					
Climate change	Adaptation measures can be implemented at a				
adaptation:	variety of scales, from individual buildings up to				
All developments	community and conurbation scale, as described in				
should be	the Town and Country Planning Association's				
designed to be	Climate change adaptation by design. A guide for				
adaptable to our	sustainable communities (2007). Figure 4.1				
changing	(below) provides examples of how adaptation				
climate, both in	measures can be integrated into the design of new				
terms of building	developments; precise measures will vary from				
design and their	development to development. Measures that will				
wider landscape	have benefits beyond site boundaries, and that will				
setting	have a cumulative impact in areas where				
	development is to be phased, should also be				
Carbon	pursued A hierarchical approach, as illustrated in Figure				
reduction:	4.2, should be taken to reducing carbon				
All development	emissions. A three-pronged approach should be				
should be	taken that:				
designed to	minimises the energy demand of new				
minimise carbon	buildings;				
and other	utilises energy efficient supply through low				
greenhouse gas	carbon technologies; and				
emissions	supplies energy from new, renewable energy				
associated with	sources.				
new					
development	Consideration should also be given to the role that				
	the masterplanning, scale, layout, building				
	orientation and massing of developments can play				
	in reducing carbon emissions associated with				
	energy use, for example through the promotion of				
	natural ventilation strategies and passive solar				
	<u>design.</u>				
	Developments should also seek to reduce				

Issue:	Recommended approach
Aim/objective	• •
	transport-related carbon emissions through location and the promotion of sustainable modes of transport. Policy 27 (above) sets requirements for carbon reduction for both new homes and non-residential buildings
Water	All new developments should be designed to
management:	optimise the opportunities for efficient water use,
To introduce high levels of water efficiency in new developments in order to respond to the severe water stress facing	reuse and recycling, including integrated water management and water conservation. Policy 27, above, sets targets for water consumption in line with Level 5 of the national Code for Sustainable Homes (CfSH) the new national technical standards for new residential development and BREEAM standards for non-residential development
Cambridge	
Site waste	Developments should be designed in a way that
management: All new development should be designed to reduce construction waste and to make it easier for future occupants to maximise levels of recycling and reduce waste being sent to landfill.	reduces the amount of construction waste, and maximises the reuse and recycling of materials at all stages of a development's lifecycle. In order to increase rates of recycling and reduce waste being sent to landfill, storage capacity for waste, both internal and external, should be an integral element of the design of new developments. Reference should be made to the requirements set out in the RECAP Waste Management Design Guide and the Council's own guidance on household waste and recycling facilities in new developments ¹³ . The Council will be supportive of innovative approaches to waste management
Use of	There are four principal considerations that should
materials:	influence the sourcing of materials:
All new	• Responsible sourcing – sourcing materials
developments	from known legal and certified sources through
should be	the use of environmental management systems
designed to	and chain of custody schemes including the

¹³ Available at https://www.cambridge.gov.uk/waste-and-recycling-provision-information-developers

Issue:	Pagammandad annragah			
	Recommended approach			
Aim/objective				
maximise	sourcing of timber accredited by the Forestry			
resource	Stewardship Council (FSC), or the Programme			
efficiency and	for the Endorsement of Forest Certification			
identify, source,	(PEFC);			
and use	• Secondary materials – reclaiming and reusing			
environmentally	material arising from the demolition of existing			
and socially	buildings and preparation of sites for			
responsible	development, as well as materials from other			
materials	post-consumer waste streams;			
	• Embodied impact of materials – the aim			
	should be to maximise the specification of			
	major building elements to achieve an area-			
	weighted rating of A or B as defined in the			
	Building Research Establishment (BRE) Green			
	Guide to Specification. Consideration should			
	also be given to locally-sourced materials;			
	• Healthy materials - where possible			
	developers should specify materials that			
	represent a lower risk to the health of both			
	construction workers and occupants. For			
	example, selecting materials with zero or low			
	volatile organic compound (VOC) levels to			
	provide a healthy environment for residents			

Proposed Modifications to Policy 50 and Table 6.2 (PM/CC/6/D) of the Cambridge Local Plan 2014: Proposed Submission

On 25 March 2015, the Government published a Written Ministerial Statement in respect of space standards following the Housing Standards Review. This statement introduced the Government's Optional Technical Standard for internal space standards (Paragraphs 56-018-20150327 – 056-022-20150327 of the National Planning Practice Guidance and the <u>Technical housing standards – nationally described space standard</u> document). The Government is clear that the Optional Technical Standard should only be introduced through development plan policies if they address a clearly evidenced need; if their impact on viability has been considered; and the timing of introduction is appropriate, in accordance with the NPPF and NPPG.

The Council recognises that the provision of sufficient space within new homes is an important element of good residential design and new dwellings should provide sufficient space for basic daily activities and needs. Prior to the introduction of the Optional Technical Standard, a number of options on space standards were put forward in the Council's Issues and Options report and consulted on during June and July 2012, and in the Issues and Options 2: Part 2 report consulted on in early 2013. The option chosen for inclusion in the Cambridge Local Plan 2014: Proposed Submission originated from the London Housing Design Guide which informed the standards in the adopted London Plan (2011). As residential space standards are based on the amount of space needed for key items of furniture and circulation space within dwellings, the requirements of the Optional Technical Standard are not significantly different from those already proposed in the Cambridge Local Plan 2014: Proposed Submission.

Need

In assessing need and drawing up the policy for the Cambridge Local Plan 2014: Proposed Submission, the Council undertook research on the unit sizes of a number of approved developments within Cambridge, in order to ascertain how the proposed standards were related to development being delivered in Cambridge. Whilst the majority of the assessed schemes coming forward in the city were considered to meet or exceed the proposed standards, there was a number failing the standard. This work has been updated to reflect the requirements of the Government's Optional Technical Standard. The Council has assessed a sample of planning applications approved since 2008. The planning applications selected for further assessment were chosen on the basis of the number of bedrooms in order to allow assessment of a range of different unit types and bedrooms against the standard and on the basis of availability of full plans. The majority of applications assessed were submitted to the Council in 2009 – 2013. In some instances, where the number of bedrooms reaches 4 and 5 bed properties, there are less planning applications available to assess against the space standard. Given the complexity of the space standard's variables, only limited information has been provided in the text here and

further information will be provided to the examination as necessary. The assessment has revealed that a number of planning applications have been made for development where internal space standards are below the new national standard. In particular:

- One bedroom units: 09/0819/FUL; 12/0321/FUL; 15/1286/FUL; 12/0628/FUL; 11/0219/FUL; 15/0557/FUL; 15/0363/FUL; 13/0901/FUL; 08/0084/FUL; 09/1140/FUL; 12/0730/FUL. In one case (13/0901/FUL), the gross internal floor area of a one bed two person unit was only 66% of the required minimum. In the case of application 12/0730/FUL, the storage provision for a one bed two person unit was only 8.7% of the required minimum.
- Two bedroom units: 12/0321/FUL; 09/1140/FUL; 08/0406/FUL; 08/0084/FUL; 15/0557/FUL; 13/0901/FUL; 15/0363/FUL; 12/0730/FUL; 11/0219/FUL; 09/0403/REM; 11/1294/FUL; 09/1000/REM; 12/0113/FUL. In respect of gross internal floor area, planning application 13/0901/FUL for a two bed four person unit was 82.7% of the required minimum. In the case of application 12/0730/FUL, the storage provision for a two bed four person unit was only 28% of the required minimum.
- Three bedroom units: 15/0695/FUL; 11/0219/FUL; 09/0403/REM; 09/1000/REM; 09/1140/FUL; 14/0978/FUL; 11/1294/FUL. In the case of planning application 09/1000/REM for a three bed five person unit, the gross internal floor area was 82.8% of the required minimum. In terms of the minimum internal storage area, planning application 12/0730/FUL provided only 28% of the required minimum.
- Four bedroom units: 14/0978/FUL; 09/1140/FUL; 12/1537/FUL; 15/0363/FUL; 10/0561/FUL; 14/1634/FUL. All of the assessed four bedroom units exceeded the minimum gross internal floor area. However, in respect of storage, planning applications 10/0561/FUL and 09/1140/FUL (for four bedroom eight person and seven person units respectively) provided only 37.7% of the required minimum.

There has therefore been a pattern of applications for planning permission being submitted for development which departs from the national minimum space standards. It is therefore considered that there is a clear justification and need in Cambridge for a policy to secure that the national minimum standards are met in new development.

Viability

In relation to viability, the Council originally commissioned viability work on the delivery of affordable housing and for the Community Infrastructure Levy which included minimum internal space standards for a range of dwelling units based on the London Plan standard in order to help test that building to this standard would be viable. The Council has commissioned an update to its viability work to assess the

Government's Optional Technical Standard requirements. This update (2015)¹⁴ by Dixon Searle has shown that the inclusion of the Governments Optional Technical Standard requirements are not likely to impact on the viability of development.

Timing

With reference to the timing of introduction of the Optional Technical Standard, the development industry has already been aware of the Council's intention to introduce minimum internal space standards for some time. Whilst the Council intended to introduce standards as set in the Cambridge Local Plan 2014: Proposed Submission, these proposed standards are not significantly different from those proposed in the Government's optional national space standard. Not only were a large number of developers directly consulted on the Issues and Options, Issues and Options 2 and Proposed Submission stages of plan-making, but a number of agents and developers responded to consultations. All stages of plan-making for the emerging Local Plan have included questions, issues and options or policies pertaining to internal space standards. Furthermore, planning officers are informally using the Government's optional national space standard already to assess development proposals where schemes appear to represent overdevelopment. Whilst the optional national space standard is not used at this stage by the Council to refuse planning applications, it is proving to be a helpful indicator for both planning officers and developers in terms of design and layout of schemes at pre-application stage.

The modifications below address the Government's Optional Technical Standard:

Policy 50: Residential space standards

Internal residential space standards

New residential units will be permitted where their gross internal floor areas meet or exceed the residential space standards set out in the table below: the Government's Technical housing standards – nationally described space standard (2015)¹⁵

The Internal design standard requires that:

- <u>a.</u> the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
- b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
- c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide

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¹⁴ RD/MC/090

¹⁵ Or successor document

- <u>d.</u> in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²
- <u>e.</u> one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
- f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area)
- g. any other area that is used solely for storage and has a head room of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
- h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement
- i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area

Designed	Dwelling type	Unit size		
occupancy		in sq m		
Flats				
1 bedspace	Studio	37		
2 bedspaces	1 bed flat	50		
3 bedspaces	2 bed flat	61		
4 bedspaces	2 bed flat	70		
4 bedspaces	3 bed flat	74		
5 bedspaces	3 bed flat	86		
5 bedspaces	4 bed flat	90		
6 bedspaces	4 bed flat	99		
2 storey houses				
4 bedspaces	2 bed	83		
4 bedspaces	3 bed	87		
5 bedspaces	3 bed	96		
5 bedspaces	4 bed	100		
6 bedspaces	4 bed	107		
3 storey houses				
5 bedspaces	3 bed	102		
5 bedspaces	4 bed	106		
6 bedspaces	4 bed	113		
7 bedspaces	4 bed	123		

Table 6.2 - Minimum gross internal floor areas and storage (m²) Number of bedrooms(b)

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) ¹⁶			1.0
	2p	50	58		1.5
2b	3р	61	70		2.0
	4p	70	79		2.0
3b	4p	74	84	90	
	5p	86	93	99	2.5
	6р	95	102	108	
4b	5p	90	97	103	
	6р	99	106	112	2.0
	7p	108	115	121	3.0
	8p	117	124	130	
5b	6р	103	110	116	
	7p	112	119	125	3.5
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	4.0

Further detail on how to apply this standard can be found by referring to the technical housing standards – nationally described space standard (2015)¹⁷

In order to ensure reasonable living conditions, residential development should have reasonable room sizes and convenient and efficient room layouts to meet the changing needs of residents over their lifetimes. Such development will:

- a. have minimum bedroom sizes for single and double bedrooms of 7.5 sq m and 11.5 sq m respectively;
- b. any room designated on plan as a study will need to be of at least the size of a single bedroom; and
- c. rooms will have a minimum headroom of 2.1m in order to allow for reasonable levels of storage and a sense of space. Any floorspace where the ceiling height is less than 2.1m will not count towards the gross internal floor area.

 $[\]frac{16}{10}$ Where a one person flat has a shower room rather than a bathroom, the floor area may be reduced from $39m^2$ to $37m^2$ $\frac{1}{10}$ Or successor document

Applicants should state the number of bedspaces/occupiers a home is designed to accommodate rather than simply the number of bedrooms. When designing homes for more than six people/bedspaces, developers should allow approximately 10 sq m per additional bedspace/person.

External residential space standards

All new residential units will be expected to have direct access to an area of private amenity space. The form of amenity space will be dependent on the form of housing and could include a private garden, roof garden, balcony, glazed winter garden or ground-level patio with defensible space from any shared amenity areas. In providing appropriate amenity space, development should:

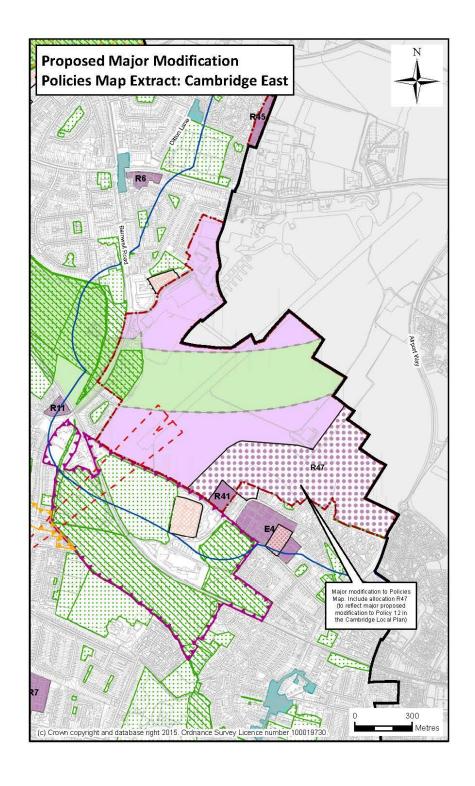
- <u>j.</u> d. consider the location and context of the development, including the character of the surrounding area;
- <u>k.</u> <u>e.</u> take into account the orientation of the amenity space in relation to the sun at different times of year;
- <u>I.</u> <u>f.</u> address issues of overlooking and enclosure, which may otherwise impact detrimentally on the proposed dwelling and any neighbouring dwellings; and
- <u>m.</u> g. design the amenity space to be of a shape, size and location to allow effective and practical use of and level access to the space by residents.

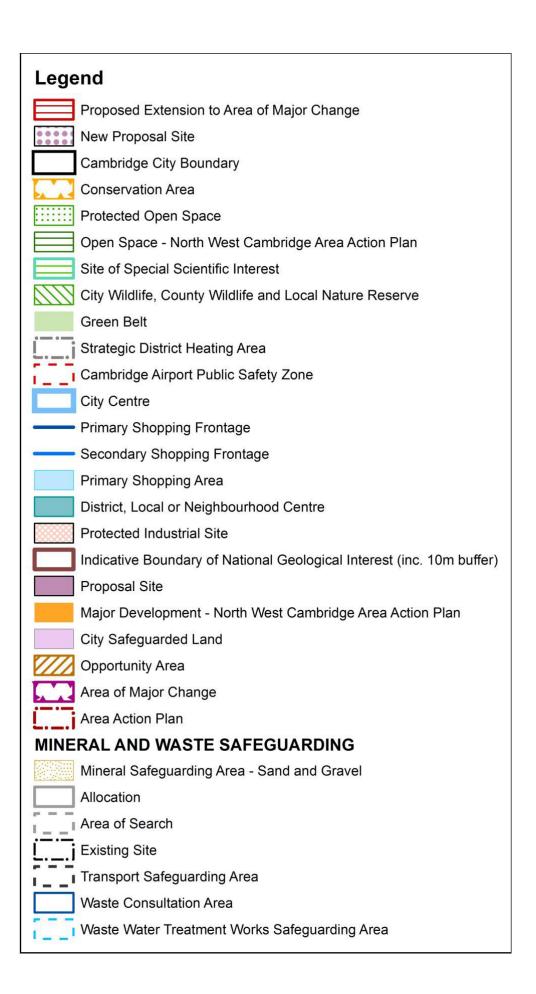
Proposed Modifications to Appendix B: Proposals Schedule of the Cambridge Local Plan 2014: Proposed Submission re: site R47 Land north of Cherry Hinton (PM/CC/B/A)

Delete allocation for R40. Replace with new allocation R47, to be added as new row below R45 reading as shown in the proposals schedule extract below.

Site	Address	Area (ha)	Existing Uses	Capacity	Provisional issues identified	Planning status
R40	Land north of Teversham Drift	8.79	Agricultural	351 dwellings 40 dph	Surface water flooding requires remediation Within the Airport Safeguarding Zone Open space requirements to reflect location in an area of accessible open space deficiency Site will need careful review of highway access	 → Allocated within the Cambridge East AAP → Local Plan re-allocation
R47	Land north of Teversham Drift	31.00	Agricultural and airport uses	780 40 dph	 Surface water flooding requires remediation Within the Airport Safeguarding Zone Open space requirements to reflect location in an area of accessible open space deficiency Site will need careful review of highway access Noise and odour from Airport Fire Training Centre, which is adjacent to the site. 	 Allocated within the Cambridge East AAP 2008 Local Plan re-allocation

Proposed Modifications to Cambridge Draft Submission Policies Map – July 2013 (PM/CC/Policies Map/A)





Appendix B: Proposed modifications to the Submission South Cambridgeshire Local Plan 2014

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
Chapter 2 Spa	atial Strategy			
PM/SC/2/A	Paragraph 2.11	Amend paragraph 2.11 as follows: The local authorities in the Cambridge Sub Region Housing Market Area have been working together for some time on a range of planning and housing issues and have prepared a joint SHMA, which was updated to inform the new Local Plans being prepared by Councils in the area. The Cambridge Sub Region SHMA 2012 identifies the objectively assessed need for housing in South Cambridgeshire and all other districts in the Cambridge Sub Region housing market area for the period 2011-2031 (Chapter 12). The SHMA considers jobs forecasts as a key part of the analysis of the overall number of homes required to meet the development needs of the area for the period 2011 to 2031. It identifies the objectively assessed need for 22,000 additional jobs and 19,000 new homes in South Cambridgeshire. Additional	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter regarding Objectively Assessed Need for Housing, and how it was considered by the Councils.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/2/B	Add a new	independent technical evidence was prepared in 2015 to further consider need for new housing taking account of national guidance published after the plans were prepared. This identified the full Objectively Assessed Need for South Cambridgeshire as 19,337 homes. This has been rounded to 19,500 in the housing target for the plan period. Add new paragraph 2.12a to read:	Positively prepared and justified. The joint	Minor
	paragraph after paragraph 2.12	A Memorandum of Understanding was also agreed between Cambridge City Council and South Cambridgeshire District Council in September 2014, which agrees that the housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development.	housing trajectory reflects the close functional relationship between the Councils, the joint development strategy and the way that strategy is being built out, in particular that sites on the edge of Cambridge are building out from the built up area in Cambridge and have not yet reached or started building over the administrative boundary is South Cambridgeshire. It is about the phasing of housing delivery, not overall housing provision. Modification relates to the changes required to give effect to the Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). This modification was attached to the Councils' Matter 1 Hearing Statement.	modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			Effective. The Memorandum of Cooperation is made under the Duty to Cooperate as part of the Councils working closely together to ensure delivery of suitable development to meet their objectively assessed needs. Consistent with national policy. National policy requires Councils to meet their objectively assessed needs and national practice guidance allows for Councils "to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'.	
PM/SC/2/C	Add new paragraph to paragraph 2.17, 3rd bullet point	Paragraph 2.17, 3rd bullet point: add new 5th paragraph to read: 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 also concluded that beyond those locations already identified in the submission Local Plans it is unlikely that any development could be	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		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.		
PM/SC/2/D	Paragraph 2.17, 4 th bullet point, 1 st paragraph	Paragraph 2.17, 4th bullet, 1st paragraph: add additional sentence to the end of the paragraph: The Councils undertook a joint Sustainability Appraisal of the overall strategy as part of the plan making process. A range of options around the impact of different levels of growth in the Green Belt on the edge of Cambridge, the approach to new settlements, major expansion of Cambourne and the best available sites at villages were identified and tested through Sustainability Appraisal, to consider the relative impact of different development packages. This included looking at different levels of growth at some of the site options to minimise adverse impacts and secure the most sustainable form of development. It identified the importance of balancing the accessibility aspects of	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		sustainable development and the environmental and social aspects. This appraisal was updated in 2015, to take account of new evidence prepared in response to Inspectors during the Local Plan Examination.		
PM/SC/2/E	Add new bullet point to paragraph 2.17, 5th bullet	Paragraph 2.17, 5th bullet: add a new final 5th sub bullet point: The Joint Strategic Transport and Spatial Planning Group (JST&SPG) considered the additional evidence prepared in 2015.	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter, and how it was considered by the Councils.	Minor modification
PM/SC/2/F	Paragraph 2.21 (table)	Amend the headings and figures in table at paragraph 2.21: Refer to table at the end of this schedule.	To update the housing land supply position, reflecting the latest monitoring information, changes in the anticipated delivery rates on major sites, and modifications proposed elsewhere in this schedule.	Minor modification
PM/SC/2/G	Paragraph 2.22 (table)	Amend the headings and figures in table at paragraph 2.22: Refer to table at the end of this schedule.	To update the housing land supply position, reflecting the latest monitoring information, changes in the anticipated delivery rates on major sites, and modifications proposed elsewhere in this schedule.	Minor modification
PM/SC/2/H	Paragraph 2.32	NOTE: PROVISIONAL MODIFICATION to amend paragraph 2.32 as follows and separate out the last sentence into a new paragraph 2.32a:	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter, and consequential modification to reflect the Main Modifications PM/SC/8/B and PM/SC/8/C.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		2.32 The latest Inner Green Belt work Review 2012, undertaken jointly with Cambridge City Council, examined the Green Belt in detail and found a number of small areas on the edge of Cambridge that are not considered of long term importance to Green Belt purposes. Given the level of need for homes and jobs, it is considered that exceptional circumstances exist to justify their release. These comprise a site between Huntingdon Road and Histon Road as an extension to the housing allocation carried forward from the Local Development Framework (Policy SS/2) and a site on Fulbourn Road as an extension to the Peterhouse Technology Park (Policy E/2). The independent Inner Green Belt Review 2015 for both Councils reached the same conclusions about the importance of land on the edge of Cambridge for Cambridge Green Belt purposes with two differences. It concluded that a smaller area adjacent to the Peterhouse Technology Park could be released from the Cambridge Green Belt. It also		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/2/I	Policy S/5 Provision of New Jobs and Homes	identified further opportunity for development on land south of the Cambridge Biomedical Campus which avoiding significant harm to Green Belt purposes. 2.32a In addition, land is released from the Green Belt at Sawston, Impington and Comberton (Policy H/1) to meet the overall need for housing and to provide a flexible and responsive package of sites that will best meet identified needs. Amend Policy S/5(b) housing requirement as follows: 19,000 19,500 new homes, including affordable housing and 85 Gypsy & Traveller pitches.	Positively prepared and justified. Additional evidence prepared in 2015 considered Objectively Assessed Need, particularly in relation to the latest household projections data and whether market signals and affordable housing indicated the need for any uplift to the national household projections starting point. This identified that the need was slightly higher than 19,000 homes, at 19,377. In response, an increase to the requirement in the Local Plan to a rounded figure of 19,500 homes is proposed. Effective. The Councils are working closely	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			together to ensure delivery of suitable development to meet their full objectively assessed needs. Consistent with national policy. National policy requires Councils to meet their objectively assessed needs.	
PM/SC/2/J	Paragraph 2.34	Amend Paragraph 2.34 as follows: The Cambridge Sub Region Strategic Housing Market Assessment 2012 (SHMA) identifies the objectively assessed took an integrated approach to the identification of the need for additional jobs and homes in South Cambridgeshire over the plan period. Additional assessment of Objectively Assessed Need was carried out in 2015 to take account of national planning guidance published after the submission of the Local Plan to consider issues around the latest national household projections, market signals and affordable housing.	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter, and consequential modification to reflect the Main Modification PM/SC/2/J.	Minor modification
PM/SC/2/K	Paragraph 2.37	Amend paragraph 2.37: The SHMA, It identifies a need for 19,000 new homes and 22,000 jobs in South Cambridgeshire by 2031. This takes account	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/2/L	Add new paragraph after paragraph 2.37	of natural change in the existing population, including demographic changes such as an ageing population, having regard to the latest information available, including the Census 2011. It also takes account of forecast migration to South Cambridgeshire to support growth in the local economy. Should the economy perform less well than forecast then a revision to the Local Plan for a corresponding reduction in the number of new homes may be necessary. The SHMA It provides a balance between jobs and homes across the HMA and confirms that there is no additional outstanding backlog arising from the Local Development Framework. Add a new paragraph after paragraph 2.37: The Objectively Assessed Need: Further Evidence published in November 2015 takes account of national guidance published after the submission of the Local Plan, the CLG 2012 national household projections, market signals and affordable need. Compared with the SHMA methodology with its integrated approach to jobs and homes it is slightly higher. It identifies a need for 19,337 new	To reflect the updated Local Plan Evidence prepared in 2015 in response to the Inspectors Letter, and explanation of the change propose by main modification PM/SC/2/J.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		homes in South Cambridgeshire by 2031. The higher of the two figures is taken to represent the full objectively assessed need for South Cambridgeshire and in the interests of positive planning has been rounded to 19,500 for the purposes of the plan requirement.		
PM/SC/2/M	Paragraph 2.39	Amend paragraph 2.39 as follows: Over the plan period, the figure of 19,000 19,500 new homes implies an average delivery rate of 950 975 homes per year. While less than the Core Strategy 2007 annualised average of 1,176 homes, for comparison over the period 2001 to 2011 a total of 7,663 homes were built at an average of 766 homes per year and the Local Plan therefore represents a consistent step change in housing delivery over a lengthy period. The phasing of housing delivery is dealt with in Policy S/12.	Modification required to ensure that the supporting text is consistent with the proposed modification PM/SC/2/J.	Minor modification
PM/SC/2/N	Paragraph 2.40	Update paragraph 2.40 to show the latest housing land supply position: Taking account of all forms of housing supply, comprising: completions in 2011-1512 (the first four years of the plan period) of 696 2,735	To update the housing land supply position, reflecting the latest monitoring information, changes in the anticipated delivery rates on major sites, and modifications proposed elsewhere in this schedule.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		homes; supply of housing on the major sites existing allocations in adopted plans (including those with planning permission) expected by 2031 of 41,413 8,771 homes; and commitments on smaller rural sites with planning permission or allocated for 2,220 homes unallocated sites with planning permission of 1,179 homes; and the Council's forecast windfall allowance of 2,450 homes, in 2012 2015 the Council had a supply of 14,000 15,135 homes towards the 19,000 19,500 home target requirement. This required sufficient new land to be identified to deliver a further 5,000 4,365 new homes in the district		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/2/O	Policy S/6: The Development Strategy to 2031	 d. The following 3 new strategic scale allocations are proposed for housing-led development with associated employment and supporting services and facilities to meet the majority of the additional development needs to 2031 and beyond: e. A new town north of Waterbeach for 8,000 to 9,000 homes, 1,400 of which by 2031; f. A new village based on Bourn Airfield for 3,500 homes 1,700 of which by 2031; g. A major expansion of Cambourne for a fourth linked village of 1,200 homes, all of which by 2031. 	Positively prepared and justified. The site promoters consider that they could start development sooner and deliver higher annual rates of housing completions. Whilst the Council is taking a cautious approach to the these matters in its housing trajectory based on available evidence of the time taken to start strategic developments and to provide a greater level of confidence of the delivery of the housing requirement, it would not be positive planning for the Local Plan policy to prevent such development if it proves to be deliverable. Effective. In order to provide a flexible strategy that can respond to any changing circumstances. Consistent with national policy. National policy requires a flexible plan that can respond to changing circumstances. This is also reflected in Main Modifications proposed to policies SS/5 Waterbeach, and SS/6 Bourn Airfield.	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/2/P	Figure 2: Key Diagram for Cambridge and South Cambridgeshire	 Change the boundary of the proposed housing allocation north of Cherry Hinton (Policy SS/3 1b) in modification PM/SC/3/A. Add a provisional modification to allocation a new employment site at Cambridge Biomedical Campus (Policy E/1B) in PM/SC/8/A. Reduce the site boundary of proposed employment allocation Fulbourn Road East (Policy E/2) in modification PM/SC/8/C. Refer to diagram at the end of this schedule. 	Consequential amendments to reflect modifications PM/SC/3/A, PM/SC/8/A and PM/SC/8/C.	Minor modification
PM/SC/2/Q	Paragraph 2.44	NOTE: PROVISIONAL MODIFICATION to amend paragraph 2.44 to refer to the Cambridge Biomedical Campus site. Cambridge City Council and South Cambridgeshire District Council jointly reached the view on the extent of change on the edge of Cambridge where only minor revisions to the inner Green Belt boundary are proposed in the Local Plans including a change to the boundary of the site between	Modification required to ensure that the supporting text is consistent with proposed modification PM/SC/8/A if new Policy E/1B is included.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/2/R	Paragraph 2.45	Huntingdon Road and Histon Road in South Cambridgeshire for housing that would not increase the overall number of homes currently planned but instead provide more room to ensure a high quality development (see Chapter 3 Strategic Sites, Policy SS/2), and an employment allocations for the expansion of Cambridge Biomedical Campus, and south of Fulbourn Road as an extension to Peterhouse Technology Park (see Chapter 8 Promoting a Strong and Competitive Economy, Policy Policies E/1B and E/2). Amend paragraph 2.45 as follows: Two new settlements – a new town north of Waterbeach and a new village at Bourn Airfield - and a major village expansion at Cambourne will provide the majority of the additional housing required by 2031. The preference to allocate all three strategic sites was influenced by the long lead in times for new settlements which will therefore come	Modification required to ensure that the supporting text is consistent with the proposed modifications to S/6.	Minor modification
		forward later in the plan period and continue developing beyond 2031. Without including a major expansion of Cambourne, a significant amount of development would be required at villages and would result in the sort of		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		dispersed development strategy confirmed as being unsustainable. The timing of development at Bourn Airfield new village has regard to the longer lead in times for the development of new settlements and so that the remainder of Cambourne is well progressed before any development starts at Bourn Airfield. This will also help provide additional flexibility and ensure a continuous supply of house building land. The new strategic sites will provide 4,370 homes in the plan period. Waterbeach not starting until towards the end of the plan period has the benefit of ensuring that delivery at Northstowe will be well established before another new town development begins, with about half the town having been built by the time Waterbeach starts delivering.		
PM/SC/2/S	Policy S/12: Phasing, Delivery and Monitoring	Amend the first paragraph of Policy S/12 to read: The Local Plan aims to achieve a continuous high level of housing production throughout the plan period to support predicted and actual jobs growth. The housing trajectories for Cambridge and South Cambridgeshire, as updated	Positively prepared and justified. Modification (in part) relates to the changes required to reflect the Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). This modification was attached to the Councils' Matter 1 Hearing Statement.	Main modification

modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development. Housing sites are not deliberately phased. a. New town at Waterbeach Barracks – to start delivering housing in 2026, unless otherwise determined through a review of the Local Plan; b. New village at Bourn Airfield – to not start delivering housing before 2022, unless an undersupply of housing earlier in the plan period is demonstrated such that it needs to come forward earlier, including to provide an adequate 5 year housing land supply.	Effective Cambridge City Council is demonstrably delivering housing within the urban areas and urban fringe sites in the early and middle parts of the plan period. South Cambridgeshire District Council is committed to delivery of housing in the urban fringe sites and at new settlements, with an emphasis on the middle and latter parts of the plan period, but with an element of village housing allocations to provide some early delivery. This is a logical and appropriate way of delivering sites that meet the combined housing need across the Greater Cambridge footprint area. The site promoters of Waterbeach and Bourn Airfield new settlements consider that they could start development sooner than set out in policy S/12. Whilst the Council is taking a cautious approach to start times in its housing trajectory based on available evidence of the time taken to start strategic developments, it would not be positive planning for the Local Plan policy to prevent such development if it proves to be deliverable.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			Consistent with National Policy The Memorandum of Understanding agreement is a duty to co-operate statement under paragraph 035 of the NPPG.	
PM/SC/2/T	Paragraph 2.60	Amend paragraph 2.60 as follows: An important aspect of the Local Plan is to ensure that there will be a continuous supply of suitable, available and deliverable housing land to meet housing needs over the whole of the plan period. The allocations in the Plan have been made with the aim of ensuring a flexible and continuous supply of housing. To this end, the Council does not propose to phase the timing of housing development. except in two important cases: 1. New town at Waterbeach Barracks—It is not expected that the new town will be able to deliver housing until towards the end of the plan period. This takes account of considerable experience in delivering new settlements in the district (Bar Hill, Cambourne and Northstowe). The Plan therefore takes a realistic view of delivery of a new town which is partly about the	Modification required to ensure that the supporting text is consistent with the proposed modification PM/SC/2/P.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		but allocation is also about development needs in the period beyond and the recognition that given the long lead in time that, like Northstowe, if a new town is to form part of the long term development strategy, a decision to allocate needs to be made in this Local Plan. In reaching this view, the Council has allocated significant major sites elsewhere to provide for needs in the most sustainable way. Therefore to ensure a continuous supply of house building land, it would not be appropriate for Waterbeach to come forward significantly earlier than envisaged in the housing trajectory and more significantly, to avoid competition with delivery at Northstowe and Bourn Airfield with negative impacts on those other developments. Therefore, Waterbeach is phased to start delivering housing in 2026 and any earlier provision can only take place through a review of the Local Plan.		
		2. New village at Bourn Airfield — Given the expected level of delivery at Waterbeach new town, the new village at Bourn Airfield is also required to deliver housing in the plan period to ensure a sustainable pattern of		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		development and not require significant levels of housing in a distributed pattern across existing villages. However, to provide flexibility and not to rely solely on major developments given their lead in times and greater vulnerability to slow down in adverse economic conditions, based on recent experience, the Council sees a need to allocate some development in existing villages. The start of development at Bourn Airfield should not start delivering housing until 2022 as part of a flexible package of sites and to ensure a continuous supply of house building land. However, if there were delay in delivery in other major sites, the Plan allows for Bourn Airfield to come forward earlier.		
PM/SC/2/U	Paragraph 2.61	Amend paragraph 2.61 to read: The South Cambridgeshire Housing Trajectory set out in Figure 3 included and updated each year in the Annual Monitoring Report illustrates the expected rate and phasing of delivery of new homes. It demonstrates how the objectively assessed need for an additional 19,000 homes between 2011 and 2031 could be achieved. This represents an average of 950 homes a year	Modification relates to the changes required to reflect the Memorandum of Understanding between Cambridge City Council and South Cambridgeshire District Council: Greater Cambridge Joint Housing Trajectory (September 2014, RD/Strat/350). This modification was attached to the Councils' Matter 1 Hearing Statement.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		but the delivery of homes will vary over the plan period responding to individual site circumstances and changes in the national economy. As outlined in paragraph 2.12a, the Councils have agreed that the housing trajectories for both areas be considered together for the purposes of housing delivery, including calculation of 5-year housing land supply in development management decisions that concern housing development. This is consistent with the development sequence and spatial development strategy for Cambridge and South Cambridgeshire, and the phasing of housing delivery reflecting that strategy. As such, sites at the top of the development sequence in and on the edge of the urban area of Cambridge will deliver in the early and middle part of the plan period. Delivery in South Cambridgeshire will be greater in the middle and latter parts of the plan period, in particular as the fringe sites build out from the edge of Cambridge and move across the administrative boundary into South Cambridgeshire and as the new settlements come forward. There will also be some housing in larger villages early in the plan period. All dwelling figures in the		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		trajectory are net additional dwellings (i.e. completed dwellings minus losses of dwellings). The trajectory relies trajectories rely on information about sites which have the potential to deliver dwellings over the next 15 years and beyond, taken from the Strategic Housing Land Availability Assessment and work on Local Plan allocation sites.		
PM/SC/2/V	Paragraph 2.66	Amend paragraph 2.66 as follows: The Council has included a good degree of flexibility in the Local Plan capable of responding to rapid change, with a number of sites that could be brought forward in the plan period if needed, including the new village at Bourn Airfield, and also has significant supply through windfalls to help make up any shortfall if that were to occur at any point during the plan period.	Consequential modification to reflect proposed Main Modification spot Policies S/6 and S/12.	Minor modification
PM/SC/2/W	Figure 3: Housing Trajectory	Delete Figure 3: Housing Trajectory Refer to diagram at the end of this schedule.	To reflect the Modification proposed to Policy S/12 (PM/SC/2/S). The trajectory in the Submitted Plan is now out of date. It is proposed to not include a replacement, but instead utilise the updated trajectories which are published annually in the Councils' Annual Monitoring Reports.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
Chapter 3 Str	ategic Sites			
PM/SC/3/A	Policy SS/3: Cambridge East	Amend Policy SS/3 as follows: 1 Land at Cambridge East, including Cambridge Airport, shown on the Policies Map, is safeguarded for longer term development beyond 2031. Development on safeguarded land will only occur once flying activities cease and following a review of the Cambridge East Area Action Plan (AAP). Land north of Newmarket Road and land north of Cherry Hinton (to be developed in conjunction with adjoining land in Cambridge), are allocated for residential development within the plan period. Proposals for residential development on these sites, as shown on the Policies Map, will only be supported if: a. It can be shown that any environmental and health impacts (including noise) from the airport can be acceptably mitigated for residents; and	Positively prepared and justified. It would not be positive, reasonable or appropriate for the Local Plans to convert an existing allocation to safeguarded land if it can reasonably be brought forward for development to help meet objectively assessed development requirements whilst the airport remains in operation. The boundary of the land that could be developed north of Cherry Hinton is more extensive than is currently allocated for development in the Local Plans. 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. Effective. The landowners both agree that additional land north of Cherry Hinton is deliverable over the plan period. The Councils are working closely together to ensure delivery of the maximum area of land appropriate with the Airport remaining operational, consistent with the objectives of	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		b. Due consideration has been given to safeguarding the appropriate future development of the wider site. c. There would not be a safety risk from the continued authorised use of Cambridge Airport. 1 It is anticipated that land north of Newmarket Road will deliver approximately 1,200 dwellings. Land north of Cherry Hinton will deliver approximately 110 dwellings in South Cambridgeshire. 1 This policy replaces Policies CE/3 and CE/35 of the Cambridge East AAP. All other policies in the Cambridge East AAP are retained. 1. Land at Cambridge East is allocated for development as shown on the Policies Map:	the AAP and the submitted Local Plans. Consistent with national policy. The land is highly sustainable being on the edge of Cambridge and not in the Green Belt, having been released from the Green Belt in the current adopted plans for development.	
		a) <u>Land north of Newmarket Road</u> will deliver approximately 1,300 dwellings during the plan period.		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		b) Land north of Cherry Hinton will deliver approximately 420 dwellings during the plan period (it adjoins land allocated in Policy 12 of the Cambridge Local Plan for 780 dwellings).		
		2. Proposals for residential development on sites a), and b) as shown on the Policies Map, will only be supported if:		
		c) <u>acceptable mitigation of</u> <u>environmental and health</u> <u>impacts (including noise) from</u> <u>the airport can be provided; and</u>		
		d) a masterplan is submitted for the development of site SS/3 1b) and adjoining land in Cambridge (site R47)which safeguards the appropriate future development of the wider safeguarded land; and		
		e) <u>the continued authorised use of</u> <u>Cambridge Airport does not pose</u>		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		a safety risk. 3. Residential development on site SS/3 1b) as shown on the Policies Map, together with adjoining land in Cambridge (site R47), will make provision for a primary and secondary school, a local centre with community hub, open space and a spine road connecting Coldham's Lane with Cherry Hinton Road.		
		4. The rest of the Cambridge East site is safeguarded for longer term development beyond 2031. Development on safeguarded land will only occur once the site becomes available and following a review of both this Plan and the Cambridge East Area Action Plan.		
		5. This policy replaces Policies CE/3 and CE/35 of the Cambridge East AAP. All other policies in the Cambridge East AAP are retained. NOTE: There is a consequential amendment		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		to the Policies Map to reflect the revision to the proposed housing allocation – refer to map at the end of this schedule.		
PM/SC/3/B	Paragraph 3.25	Amend paragraph 3.25 as follows: In reviewing the future options for this large site, Cambridge City Council and South District Council have concluded that it is appropriate that this the site allocated in the AAP remain out of the Green Belt and be safeguarded as a strategic reserve of land to be developed at a later date. The corridor of Green Belt running from Coldham's Common to Teversham will remain as Green Belt. Policies in the existing Cambridge East AAP will remain other than Policies CE/3 and CE/35.	Modification required to ensure that the supporting text is consistent with the proposed modifications to Policy SS/3.	Minor modification
PM/SC/3/C	Paragraph 3.26	Delete paragraph 3.26: This policy replaces both policies CE/3 and CE/35. This policy safeguards the main airport site for longer term development needs beyond 2031. Were circumstances to change, a review of this policy and the Cambridge East AAP could examine the consequences of the change.	Modification required to ensure that the supporting text is consistent with the proposed modifications to Policy SS/3.	Minor modification
PM/SC/3/D	Paragraph 3.27	Amend paragraph 3.27 as follows:	Modification required to ensure that the	Minor

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		There is potential for residential development for a number of parcels of land-There is an opportunity during the plan period to deliver residential development on parts of Cambridge East while the airport remains on the site. A number of specific sites are allocated in Policy SS/3 (1) and Policy 12 (1) of the Cambridge Local Plan (see Figure 7). These were identified in the AAP as capable of coming forward ahead of the Airport site, and potentially without it. Careful consideration of how the on-going airport activities will interact with any new residential use will be needed at the planning application stage to ensure that the new homes have a high level of amenity, and that the continued authorised use of the airport would not be compromised. Any development that comes forward in advance of the wider site will have to be carefully planned and demonstrate that it is capable of working both with and without the wider development, so as not to prejudice the potential delivery of development on the safeguarded land at some point in the future if it becomes available. This policy makes it clear that these areas are not part of the wider	supporting text is consistent with the proposed modifications to Policy SS/3.	modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/3/E	Add new paragraphs after paragraph 3.27	safeguarded site and are allocated to come forward for development before 2031. A masterplan for site SS/3 (1b) and adjoining land in Cambridge will be required in order to ensure a comprehensive and coordinated approach to bringing these sites forward for development. Add new paragraphs 3.27a and 3.27b to read: 3.27a Cambridge City Council and South Cambridgeshire District Council accept that there is an existing need for a new secondary school to serve the eastern part of Cambridge, in response to demographic pressures. 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 development on land north of Cherry Hinton should not come forward before there is an agreed approach to the	Consequential modification resulting from proposed Main Modification to Policy SS/3, and to provide the justification for requirement to make provision for new schools within the policy area.	Minor modification
		delivery of sufficient school capacity in the area, including land for the		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		provision of a secondary school being made available. As an exception to policy CE/6 of the Cambridge East AAP, the secondary school need not be included in the local centre. In common with practice elsewhere around Cambridge, and in line with national policy on Green Belt, it will be acceptable for school playing fields to be located in the retained Green Belt. 3.27b This policy safeguards the main airport site for longer-term development needs beyond 2031. Were circumstances to change, a review of this plan and the Cambridge East AAP could examine the consequences of the change. Policies in the existing Cambridge East AAP will remain other than Policies CE/3 and CE/35.		
PM/SC/3/F	Figure 6	NOTE: PROVISIONAL MODIFICATION to amend Figure 6 to include new employment allocation in modification PM/SC/8/A. Refer to diagram at the end of this schedule.	Consequential amendment to reflect modification PM/SC/8/A	Minor modification
PM/SC/3/G	Figure 7	Amend Figure 7 to show a revision to the boundary of the allocation north of Cherry	Consequential amendment to reflect modification PM/SC/3/A	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		Hinton (Policy SS/3 1b) in modification PM/SC/3/A Refer to diagram at the end of this schedule.		
PM/SC/3/H	Policy SS/5: Waterbeach New Town	5. No more than 1,400 dwellings will be completed by 2031, except as may be agreed by the Local Planning Authority to be necessary to maintain a 5 year supply of deliverable housing sites.	Positively prepared and justified. The site promoters consider that they could start development sooner and deliver higher annual rates of housing completions. Whilst the Council is taking a cautious approach to the these matters in its housing trajectory based on available evidence of the time taken to start strategic developments and to provide a greater level of confidence of the delivery of the housing requirement, it would not be positive planning for the Local Plan policy to prevent such development if it proves to be deliverable. Effective. In order to provide a flexible strategy that can respond to any changing circumstances. Consistent with national policy. National policy requires a flexible plan that can respond to changing circumstances.	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/3/I	Policy SS/6: New Village at Bourn Airfield	4. Development will be phased so that the first housing completions will be in 2022, with no more than 1,700 dwellings being completed by 2031, except as may be agreed by the Local Planning Authority to be necessary to maintain a 5 year supply of deliverable housing sites.	Positively prepared and justified. The site promoters consider that they could start development sooner and deliver higher annual rates of housing completions. Whilst the Council is taking a cautious approach to the these matters in its housing trajectory based on available evidence of the time taken to start strategic developments and to provide a greater level of confidence of the delivery of the housing requirement, it would not be positive planning for the Local Plan policy to prevent such development if it proves to be deliverable. Effective. In order to provide a flexible strategy that can respond to any changing circumstances. Consistent with national policy. National policy requires a flexible plan that can respond to changing circumstances.	Main modification
Chapter 4 Clir	nate Change			
PM/SC/4/A	Paragraph 4.12	Delete paragraph 4.12 and accompanying footnote: The Government's zero carbon policy that is	Consistent with national policy. HM Treasury, Fixing the foundations – Creating a more prosperous nation (July 2015) This sets out that the government does	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		due to be introduced for new dwellings in 2016 and for new non-residential buildings in 2019 is likely to require new developments to achieve zero carbon for regulated emissions using a combination of on-site solutions and off-site 'allowable solutions'. Where 'allowable solutions' are needed for a proposal to achieve zero carbon (as set out in Building Regulations), and if a Cambridgeshire Community Energy Fund exists, the Council's preference is that developers contribute to this fund to ensure that the benefits are retained locally. 1-Regulated' emissions are typically those relating to space and water heating, cooling, ventilation and lighting, which are all controlled by Building Regulations. 'Unregulated' emissions are typically those relating to appliances and processes that are specific to the occupier, and these can often account for over half of the total emissions of the	not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established. The proposed modifications reflect the Government's latest statement on 'allowable solutions'. Minor modification to ensure consistency with national policy.	
PM/SC/4/B	Policy CC/2: Renewable and low carbon	building. Amend wording of criteria 1 of Policy CC/2 as follows:	Consistent with national policy. 18 June 2015 – Written Ministerial Statement made by the Secretary of State for	Minor modification
	energy generation	Planning permission for proposals to generate energy from renewable and low carbon sources, with the exception of	Communities and Local Government (Greg Clark) – Local planning (HCWS42) – this Written Statement sets out new	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		proposals for wind turbines, will be permitted provided that:	considerations to be applied to proposed wind energy development: 'When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if: • the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and • following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. In applying these new considerations, suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan.' The proposed modifications clarify that criteria 1 does not apply to wind energy developments, and therefore the policy is consistent with the guidance included in the Written Statement.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/4/C	Policy CC/2:	Amond wording of critoria 1a of Policy CC/2	Minor modification required to ensure that the plan is consistent with changes to national planning policy.	Main
PM/SC/4/C	Policy CC/2: Renewable and low carbon energy generation	Amend wording of criteria 1a of Policy CC/2 as follows: a. The development, either individually or cumulatively with other developments, does not have unacceptable adverse impacts on heritage assets (including their settings), natural assets, high quality agricultural land, the landscape, or the amenity of nearby residents (visual impact, noise, shadow flicker, odour, fumes, traffic);	Consistent with national policy. 25 March 2015 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) This WMS covers a number of topics related to local plan policies including solar energy. It states: 'The National Planning Policy Framework includes strong protections for the natural and historic environment and is quite clear that local councils when considering development proposals should take into account the economic and other benefits of the best and most versatile agricultural land. Yet, some local communities have genuine concerns that when it comes to solar farms insufficient weight has been given to these protections and the benefits of high quality agricultural land' The proposed modifications will ensure that consideration is given to the impact of the	modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			proposed development on agricultural land. Main modification required to ensure that the plan is consistent with changes to national planning policy.	
PM/SC/4/D	Policy CC/2: Renewable and low carbon energy generation	Revise wording of criteria 2 of the policy as follows: For proposals of 2 or more wind turbines, a minimum distance of 2 km between a dwelling and a wind turbine is set to protect residents from disturbance and visual impact. If the applicant can prove that this is not the case, a shorter distance would be considered. Planning permission for wind energy development involving one or more wind turbines will only be permitted provided that: e. the development site is in an area identified as suitable for wind energy development in a Neighbourhood Plan; and f. following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their	Consistent with national policy. 18 June 2015 – Written Ministerial Statement made by the Secretary of State for Communities and Local Government (Greg Clark) – Local planning (HCWS42) – this Written Statement sets out new considerations to be applied to proposed wind energy development: 'When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if: • the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and • following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		<u>backing.</u>	In applying these new considerations, suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan.' The proposed modification replaces the requirement for a minimum separation distance between a dwelling and a wind turbine, included as there was support from Members, Parish Councils and local residents for this criteria, with the guidance set out in the Written Statement.	
			The Council has not identified areas as suitable for wind energy development in the Local Plan; however areas could be identified in Neighbourhood Plans made during the plan period. Main modification required to ensure that the	
			plan is consistent with changes to national planning policy.	
PM/SC/4/E	Policy CC/4 Sustainable Design and Construction	Revise wording of section 1 of Policy CC/4 as follows: All new residential developments must	Consistent with national policy. 25 March 2015 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) This	Main modification
		achieve as a minimum the equivalent of	Written Ministerial Statement withdraws the	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		Code for Sustainable Homes Level 4 for water efficiency (105 litres per person per day) water efficiency equivalent to 110 litres per person per day.	Code for Sustainable Homes aside from legacy cases and sets out a new approach for the setting of technical standards for new housing, including for water efficiency. It states under the sections on Housing standards: streamlining the system and Plan making that: 'New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing The new system will comprise new additional optional Building Regulations on water and access From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new	
			development; the government has now	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			withdrawn the code, aside from the management of legacy cases The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered.'	
			The proposed modifications take account of the withdrawal of the Code for Sustainable Homes and the introduction of optional Building Regulations standards by removing details related to the Code for Sustainable Homes, and amending the policy to refer to the optional new national technical standard for water efficiency.	
			The Cambridge Water Company is in an area of water stress as designated by the Environment Agency. Cambridge Water Company's Resources Management Plan shows that beyond 2035, without additional resources or greater efficiency, the need for water to serve development will be greater than currently available supply. The policy reflects these local circumstances by requiring higher water efficiency standards than the	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			national Building Regulations. The efficiency measures required can be delivered at relatively low additional cost. Main modification required to ensure that the plan is consistent with changes to national	
			planning policy.	
PM/SC/4/F	Paragraph 4.19	Update paragraph 4.19 to read as follows:	Consistent with national policy. 25 March 2015 – Written Ministerial Statement	Minor modification
		The Council is relying on the planned changes	from the Secretary of State for Communities	
		to Building Regulations anticipated to come	and Local Government (Eric Pickles) This	
		into force in 2013 2014 and 2016, which will	Written Ministerial Statement withdraws the	
		progressively improve to set the energy	Code for Sustainable Homes aside from	
		efficiency requirements of new homes.	legacy cases and sets out a new approach for	
		Previously it had been the Government's	the setting of technical standards for new	
		intention that all new dwellings would be	housing, including for water efficiency. It	
		required to be zero carbon from 2016;	states under the sections on Housing	
		however in the publication of Fixing the	standards: streamlining the system and Plan	
		Foundations – Creating a More Prosperous	making that:	
		Nation (published in July 2015), the	'New homes need to be high quality,	
		Government made it clear that it does not	accessible and sustainable. To achieve this,	
		intend to proceed with this. These changes	the government has created a new approach	
		will mean that the Building Regulations	for the setting of technical standards for new	
		requirements for energy efficiency in 2013	housing The new system will comprise	
		2014 will correspond roughly with the carbon	new additional optional Building Regulations	
		reduction requirements of the Code for	on water and access From the date the	
		Sustainable Homes (CfSH) Level 4 and in	<u>Deregulation Bill 2015</u> is given Royal Assent,	

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		2016 with Level 5. There are no planned changes at the national level to improve water efficiency requirements. The Government has created a new approach for the setting of technical standards for new housing, including relating to water efficiency. The web based planning practice guidance (PPG) states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of water efficiency where there is a clear local need.	local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the code, aside from the management of legacy cases The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015.'	

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			HM Treasury, Fixing the foundations – Creating a more prosperous nation (July 2015) This states that the government does not intend to proceed with the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review. The proposed modifications clarify that the Council intend to rely on Building Regulations to set energy efficiency requirements for new homes, but that the PPG allows local authorities to apply an optional technical standard for water efficiency that is higher than Building Regulations where there is a clear local need. Note: this modification also includes revision to the text proposed in modification number MC/4/05, submitted with the Submission Local Plan.	
			Minor modification to ensure consistency with modified policy wording.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/4/G	Policy CC/8: Sustainable Drainage Systems	Update criterion a of Policy CC/8 as follows: Surface water drainage schemes comply with the forthcoming National SuDS Standards, Sustainable Drainage Systems: Non-statutory technical standards for sustainable drainage systems, the Cambridgeshire SuDS Design and Adoption Manual and the Cambridgeshire SuDS Handbook and the Cambridgeshire Flood and Water Supplementary Planning Document or successor documents;	Consistent with national policy. 18 December 2014 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) – Sustainable Drainage Systems – covers the new planning regime for the use of sustainable drainage systems in new development. Link to non-technical standards for design, maintenance and operation of SuDS: https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards Minor modification required to ensure that the plan is consistent with changes to national planning policy.	Minor modification
PM/SC/4/H	Paragraph 4.32	Update paragraph 4.32 to read as follows: The Government is committed to protecting people and property from flood risk and expects that SuDS will be provided in new developments wherever this is appropriate. As a result of the Flood and Water Management Act 2010, Sustainable Drainage Systems (SuDS) will soon be required for all	Consistent with national policy. 18 December 2014 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) – Sustainable Drainage Systems – covers the new planning regime for the use of sustainable drainage systems in new development.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/4/I	Paragraph 4.33	developments. However, there is still a risk that SuDS are seen as later additions to development, and do not fully realise their potential multifunctional benefits. They should be considered from the beginning of the design and masterplanning process- taking account of all opportunities and constraints, including heritage and wildlife assets. Revise wording of paragraph 4.33 as follows:	Note: this modification also includes revision to the text proposed in modification number MC/4/08, submitted with the Submission Local Plan. Minor modification required to ensure that the plan is consistent with changes to national planning policy Consistent with national policy.	Minor
1 100074/1	Taragraph 4.55	In some areas of the district infiltration SuDS will not be practicable due to ground conditions, but there are a wide range of measures that can be implemented to find suitable solutions for all sites. Detailed guidance on developing proposals that include the use of SuDS that effectively manage water, are aesthetically pleasing, conserve, accommodate and enhance biodiversity, and provide amenity for local residents is provided in the Cambridgeshire Flood and Water Supplementary Planning Document.	18 December 2014 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) – Sustainable Drainage Systems – covers the new planning regime for the use of sustainable drainage systems in new development. Minor modification required to ensure that the plan is consistent with changes to national planning policy.	modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/7/A	Policy H/4 Fen Drayton Former Land Settlement Association Estate	Within the former Land Settlement Association Estate at Fen Drayton, as defined on the Policies Map, planning permission for the redevelopment of existing buildings (excluding glasshouses) will be permitted provided that: a. Any new development delivers onsite experimental or groundbreaking forms of sustainable living and that any new dwellings achieve Code for Sustainable Homes Level 6 are carbon neutral and any non-residential buildings achieve Building Research Establishment Environmental Assessment Method (BREEAM) outstanding standard;	Consistent with national policy. 25 March 2015 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) This Written Ministerial Statement withdraws the Code for Sustainable Homes aside from legacy cases. It states under the section on Plan making that: 'From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the code, aside from the management of legacy cases.' The proposed modifications take account of the withdrawal of the Code for Sustainable Homes by removing details related to the Code for Sustainable Homes by removing details related to the Code for Sustainable Homes, and amending	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			the policy so that it will still ensure the delivery of the same outcomes. The Fen Drayton former LSA estate would be considered as 'countryside', if it was not designated as a special policy area. Housing would therefore not usually be permitted in this location unless it was a replacement dwelling, reusing/converting an existing building or a dwelling required for the functioning of a rural enterprise or tied to agricultural use. For housing to be acceptable in this location, the current adopted policy in the Site Specific Policies DPD (January 2010) requires new developments to deliver ground breaking and experimental forms of sustainable living, which is defined in the accompanying SPD as meeting the Code for Sustainable Homes Level 6. Continuing to seek 'ground breaking and experimental forms of sustainable living' in this location is consistent with national policy as the National Planning Policy Framework (NPPF, published in March 2012) allows new	
			isolated homes in the countryside in certain circumstances, such as delivering an	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			exceptional quality or innovative nature to the design of the dwelling (paragraph 55); supports the move to a low carbon future by planning for development in a location and way to reduce greenhouse gas emissions (paragraph 95); and states that new developments should be planned to minimise energy consumption and avoid increased vulnerability to the range of impacts arising from climate change (paragraphs 96 and 99). Whilst the policy can no longer specifically require that new dwellings in this location applied for under this policy must achieve Code for Sustainable Homes Level 6, any new dwelling should still be 'experimental and ground breaking' and carbon neutral. Main modification required to ensure that the plan is consistent with changes to national planning policy.	
PM/SC/7/B	Paragraph 7.17	Revise wording of paragraph 7.17 as follows:	Consistent with national policy. 25 March 2015 – Written Ministerial Statement	Minor modification
		The Code for Sustainable Homes (CfSH) and	from the Secretary of State for Communities	modification
		Building Research Establishment `	and Local Government (Eric Pickles) This	
		Environmental Assessment Method	Written Ministerial Statement withdraws the	
		(BREEAM) for non-residential buildings are is	Code for Sustainable Homes aside from	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		a nationally recognised assessment assessments for measuring the sustainability of non-residential buildings. Each dwelling or building is assessed against a number of categories covering energy use, water consumption, materials, surface water run-off, waste, pollution, health and wellbeing, management, land use and ecology, transport, and innovation to produce an overall score for the sustainability of the dwelling or building.	legacy cases. It states under the section on Plan making that: 'From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the code, aside from the management of legacy cases.' The proposed modifications take account of the withdrawal of the Code for Sustainable Homes by removing details related to the Code for Sustainable Homes, and amending the paragraph so that it only refers to the BREEAM assessment. Minor modification to ensure consistency with modified policy wording.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/7/C	Paragraph 7.18	Revise wording of paragraph 7.18 as follows: In certain circumstances, the local planning authority will consider alternative development proposals: • a new dwelling that achieves CfSH Level 5 annual net zero carbon emissions from the 'regulated' energy uses provided that the energy performance rating of the existing dwelling is significantly improved through retrofitting of energy efficiency solutions and/or renewable energy micro-generation technologies; or • using the combined footprint from the demolition of an existing house and an eligible outbuilding to provide a new dwelling that achieves annual net zero carbon emissions from the 'regulated' energy uses CfSH Level 5.	25 March 2015 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) This Written Ministerial Statement withdraws the Code for Sustainable Homes aside from legacy cases. It states under the section on Plan making that: 'From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the code, aside from the management of legacy cases.' The proposed modifications take account of the withdrawal of the Code for Sustainable Homes by removing details related to the Code for Sustainable Homes by removing details related to the Code for Sustainable Homes, and amending	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			the paragraph so that it will still ensure the delivery of the same outcomes. Minor modification to ensure consistency with modified policy wording.	
PM/SC/7/D	Policy H/8 Housing Mix	Include reference in criterion 1 in Policy H/8 to 'those seeking starter homes' and 'people wishing to build their own homes. A wide choice, type and mix of housing will be provided to meet the needs of different groups in the community including families with children, older people, those seeking starter homes, people wishing to build their own homes and people with disabilities. The market homes in developments of 10 or more homes will consist of: a. At least 30% 1 or 2 bedroom homes; b. At least 30% 3 bedroom homes; c. At least 30% 4 or more bedroom homes; d. With a 10% flexibility allowance that can be added to any of the above categories taking account of local circumstances.	Consistent with national policy. The Local Plan needs to include mention of the housing needs for different groups of people including those seeking starter homes and people wishing to build their own homes to reflect changes mentioned in two Government policy statements - 2 March 2015 – Written Ministerial Statement by Brandon Lewis MP DCLG Changing planning policy to enable starter homes for first time buyers. 26 March 2015 – Revision to National Planning Practice Guidance – Housing and economic development needs assessment section – Paragraph 21 – Government wanting to enable more people to build their own home. Local Planning Authority should identify demand for custom build in their areas and compile a local list or register of people who want to build their own homes.	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			The policy has been amended to allow for consideration of people building their own homes. Main modification required to ensure that the plan is consistent with changes to national planning policy.	
PM/SC/7/E	Policy H/8 Housing Mix	Amend section 2 of the policy as follows:	Consistent with national policy. The Local Plan needs to include mention of	Main modification
	Housing with	Section 1 is subject to:	the housing needs for different groups of	mounication
		e. The housing mix of affordable homes	people including those seeking starter homes	
		(except starter homes) in all	and people wishing to build their own homes	
		developments being determined by	to reflect changes mentioned in two	
		local housing needs evidence;	government policy statements -	
		f. The mix of market homes to be		
		provided on sites of 9 or fewer homes	2 March 2015 – Written Ministerial Statement	
		taking account of local circumstances;	by Brandon Lewis MP DCLG Changing	
		g. On all sites of 20 or more dwellings.	planning policy to enable starter homes for	
		and in each phase of strategic sites,	first time buyers.	
		developers will supply dwelling plots		
		for sale to self and custom builders.	26 March 2015 – Revision to National	
		Where plots have been made available	Planning Practice Guidance – Housing and	
		and appropriately marketed for at least	economic development needs assessment	
		12 months and have not been sold, the	section – Paragraph 21 – Government	
		plot(s) may either remain on the	wanting to enable more people to build their	
		market or be built out by the	own home. Local Planning Authority should	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		developer.	identify demand for custom build in their areas and compile a local list or register of people who want to build their own homes. The PPG states that in addressing the needs for all types of housing plan makers should consider people wishing to build their own homes. The Government wants to enable more people to build their own home and wants to make this form of housing a mainstream housing option. Local planning authorities should, therefore, plan to meet the strong latent demand for such housing. Additional local demand, over and above current levels of delivery can be identified from secondary data sources. South Cambridgeshire District Council is one of the vanguard authorities and has a self build register. As a local planning authority it has made an early start to considering the needs of people wishing to build their own homes and the modification seeks to achieve this through the Local Plan. Main modification required to ensure that the	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			plan is consistent with changes to national planning policy.	
PM/SC/7/F	Paragraph 7.24	Amend paragraph 7.24 to include additional wording after the second sentence as following: The high cost of housing locally also affects the size of home that many people can afford, even if their preference would be for a larger property, and it is important to provide for everyone's needs and help create mixed and balanced communities. The Council will encourage the creation of sites for starter homes within the district so that first time buyers are given more opportunities to live in the district. Also the Council will support those people wishing to build their own homes.	Consistent with national policy. The Local Plan needs to include mention of the housing needs for different groups of people including those seeking starter homes and people wishing to build their own homes to reflect changes mentioned in two government policy statements - 2 March 2015 – Written Ministerial Statement by Brandon Lewis MP DCLG — changing planning policy to enable starter homes for first time buyers. National planning policy and practice guidance make it clear that Local Planning Authority should identify demand for custom build in their areas and make provision in their local plans. 26 March 2015 – Revision to National Planning Practice Guidance — Housing and economic development needs assessment section — Paragraph 21 — Government wanting to enable more people to build their own home. Local Planning Authority should	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			identify demand for custom build in their areas and compile a local list or register of people who want to build their own homes. South Cambridgeshire District Council is one of the vanguard authorities and has a self build register. As a local planning authority it has made an early start to considering the needs of people wishing to build their own homes and the modification seeks to achieve this through the Local Plan. Minor modification to ensure consistency with modified policy wording.	
PM/SC/7/G	New paragraph after 7.27	Add new paragraph after 7.27 to read as follows: Custom and self build housing is housing built or commissioned by individuals (or groups of individuals) for their own occupation. As the Local Plan allocates mainly larger housing sites, without this policy, it is likely that custom and self builders would struggle to compete for sites. In October 2015 there were 229 people registered on the South Cambridgeshire Right to Build register which had been open since January 2015. New	Consistent with national policy. The Local Plan needs to include mention of the housing needs for different groups of people including those seeking starter homes and people wishing to build their own homes to reflect changes mentioned in two government policy statements - 2 March 2015 – Written Ministerial Statement by Brandon Lewis MP DCLG Changing planning policy to enable starter homes for first time buyers.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		applications now average around 10 per month. This policy helps local residents develop their own lower cost market housing, supports the local economy by providing work for local builders and tradesmen, increases the diversity of housing supply, and will facilitate innovative designs and the development of more sustainable houses.	26 March 2015 – Revision to National Planning Practice Guidance – Housing and economic development needs assessment section – Paragraph 21 – Government wanting to enable more people to build their own home. Local Planning Authority should identify demand for custom build in their areas and compile a local list or register of people who want to build their own homes. South Cambridgeshire District Council is one of the vanguard authorities and has a self build register. As a local planning authority it has made an early start to considering the needs of people wishing to build their own homes and the modification seeks to achieve this through the Local Plan. Minor modification to ensure consistency with modified policy wording.	
PM/SC/7/H	Paragraph 7.59	Add a sentence to the end of paragraph 7.59 as follows: The Government's Planning Policy for Travellar Sites requires that lead planning	Consistent with national policy. On 31 August 2015, the Government published Planning Policy for Traveller Sites which should be read in conjunction with the	Minor modification
		Traveller Sites requires that local planning authorities set targets for the provision of Gypsies and Traveller pitches and Travelling	National Planning Policy Framework. The new planning policy document redefines 'traveller' in planning policy to exclude those who no	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		Showpeople plots which address the likely site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. This policy document was updated in August 2015 to include a new definition of 'gypsies and travellers' for the purposes of planning policy.	longer travel permanently. The glossary contains this revised meaning in Annex1 page 9 of the publication. Minor modification to ensure consistency with modified policy wording.	
PM/SC/7/I	Paragraph 7.78	Amend paragraph 7.78 to read as follows: This policy addresses specific design principles that should be met by all new Gypsy and Traveller sites or Travelling Showpeople sites. The Government has published specific guidance relating to the design of Gypsy and Traveller pitches (Designing Gypsy and Traveller Sites — Good Practice Guide) which should be considered when applying for planning permission. Further guidance Guidance will also be included in the District Design Guide SPD.	Consistent with national policy. On 31 August 2015, the Government published Planning Policy for Traveller Sites which should be read in conjunction with the National Planning Policy Framework. The new planning policy document redefines 'traveller' in planning policy to exclude those who no longer travel permanently. With the publication of this new guidance on traveller sites an existing document called 'Designing Gypsy and Traveller sites: good practice guide' was withdrawn on 1 September 2015. Minor modification to ensure consistency with modified policy wording.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
PM/SC/7/J	Paragraph 7.79	Amend paragraph 7.79 to read as follows: Gypsy and Traveller caravan sites are predominantly residential uses. This is established by government guidance on designing Gypsy and Traveller sites and is reflected in South Cambridgeshire. Any employment uses would require planning permission, and could therefore be considered on their merits in the particular location. However, Travelling Showpeople may require space for the storage and maintenance of large pieces of equipment. The site design and layout should ensure the amenity and safety of residents is protected by locating non-residential uses away from the residential and communal areas.	Consistent with national policy. Responding to changes in national policy since the local plan was submitted in March 2014. On 31 August 2015, the Government published Planning Policy for Traveller Sites which should be read in conjunction with the National Planning Policy Framework. The new planning policy document redefines 'traveller' in planning policy to exclude those who no longer travel permanently. With the publication of this new guidance on traveller sites an existing document called 'Designing Gypsy and Traveller sites: good practice guide' was withdrawn on 1 September 2015. Minor modification to ensure consistency with modified policy wording.	Minor modification
PM/SC/7/K	Policy H/1: Allocations for Residential Development at Villages	Include a new section to Policy H/1 below the existing policy text with a new subheading, together with additional supporting text as follows: Parish Council led Allocations for	These sites were agreed for inclusion in the submission Local Plan at the 11 th February 2014 meeting of the Planning Policy and Localism Portfolio Holder, and by Council on 13 th March 2014.	Main modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		H/1:i Land at Linton Road, Great Abington	The Parish Councils of Great and Little Abington, have promoted a number of small scale housing developments through the South Cambridgeshire Local Plan process to	
		Area (ha.) and indicative dwelling capacity: 4.11 ha. 35 dwellings	meet identified local housing needs, as an alternative to taking forward a Neighbourhood Plan. Local people were consulted by leaflet about whether the sites should be developed	
		 <u>Retention of the allotments.</u> <u>Retention of boundary trees and</u> hedges except as required to provide 	and there is clear evidence of local support. These Parish Council-led sites were brought forward just before the submission of the Local Plan for examination and have already	
		 for access. Creation of a community orchard on the south of the site to provide a soft 	been identified as Main Modifications, but have not yet been generally consulted upon. They provide part of the Council's housing	
		 green edge. This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated 	supply, respond to the localism agenda, provide additional rural housing as supported by the DEFRA 'Towards a one nation economy: A 10-point plan for boosting	
		local support. Developments should seek to fulfil the aspirations of the Parish Council for the site.	productivity in rural area' publication of August 2015, and provide flexibility in housing land supply. This consultation provides an opportunity for consultation to be carried out	
		H/1:j Land at High Street / Pampisford Road, Great Abington	by the district council ahead of consideration at the examination.	
		Area (ha.) and indicative dwelling capacity:	Parish Council led proposals pursued through	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		 0.55 ha. 12 dwellings Development requirements: Retention of boundary trees and hedges except as required to provide for access. Creation of a landscape buffer along the boundary of the site where it adjoins or could be seen from open countryside to provide a soft green village edge. This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated local support. Developments should seek to fulfil the aspirations of the Parish Council for the site. H/1: k Land at Bancroft Farm, Church Lane, Little Abington Area (ha.) and indicative dwelling capacity: 0.42 ha. 6 dwellings Development requirements: 	Local Plan instead of Neighbourhood Plans. To ensure that the Local Plan is positively prepared and effective. To ensure that the Local Plan is consistent with national policy set out in the NPPF at paragraphs 14, 17 (bullet point 1), 47, 150 and 155. This consultation provides an opportunity for consultation to be carried out by the district council ahead of consideration at the examination. NOTE: this modification has been subject to original Sustainability Appraisal accompanying the Submission Local Plan (see Part 3, Appendix 6).	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		 Enhancement of the Conservation Area with a high quality development of cottages suitable for 'downsizers' with generous room sizes. Retention of the flint boundary wall either as a boundary wall or as part of built development and except as required to provide for access. Creation of a landscape buffer along the rear of the site to provide a soft green village edge. This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated local support. Developments should seek to fulfil the aspirations of the Parish Council for the site. 		
		And add new supporting text after paragraph 7.7 as follows: 7.7a The Parish Council led village residential development sites in Policy H/1 have been proposed by Parish Councils to meet local aspirations for growth and as an alternative to their preparation of a Neighbourhood Plan. These have been included in the plan as an		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		exception to the sustainable spatial strategy for the district set out in Policy S/6 as local support has been demonstrated through local village consultations. Developers should work closely with the relevant Parish Council, and seek to fulfil the aspirations of the Parish Council for the site.		
		NOTE: There is a consequential amendment to the Policies Map to reflect the proposed housing allocations – refer to map at the end of this schedule.		
PM/SC/7/L	Policy H/1: Allocations for Residential Development at Villages	Include the following site within the new parish council led allocations section in Policy H/1, to follow the policy wording change detailed in modification PM/SC/7K.	This site was agreed for inclusion in the submission Local Plan at the 11 th February 2014 meeting of the Planning Policy and Localism Portfolio Holder, and by Council on 13 th March 2014.	Main modification
	-	H/1: I Land at Toseland Road, Graveley Area (ha.) and indicative dwelling capacity:	The Parish Council of Graveley promoted two small scale housing developments through the South Cambridgeshire Local Plan process to	
		0.40 ha. 6 dwellings Development requirements:	meet identified local housing needs, as an alternative to taking forward a Neighbourhood Plan. Local people were consulted by leaflet	
		Consider if there could be impacts on residential amenity from the Cotton Wind Farm and design to mitigate as	about whether the sites should be developed and there is clear evidence of local support for the Toseland Road site. This Parish Council-	

	site was brought forward just before the	
Retention of mature trees and hedgerows and creation of a landscape buffer along the rear of the site to provide a soft green development edge. This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated local support. Developments should seek to fulfil the aspirations of the Parish Council for the site including a contribution to benefit the wider village community. NOTE: There is a consequential amendment to the Policies Map to reflect the proposed housing allocation – refer to map at the end of this schedule. Submi and ha Modific consultants and have been included in the Local roll ocalism of Aug. Nousing a contribution to benefit the wider village community. NOTE: There is a consequential amendment to the Policies Map to reflect the proposed housing allocation – refer to map at the end of this schedule.	mission of the Local Plan for examination has already been identified as a Major diffication, but has not yet been generally sulted upon. It provides part of the uncil's housing supply, responds to the alism agenda, provides additional rural sing as supported by the DEFRA 'Towards he nation economy: A 10-point plan for sting productivity in rural area' publication august 2015, and provides flexibility in sing land supply. This consultation wides an opportunity for consultation to be ried out by the district council ahead of sideration at the examination. Ish Council led proposal pursued through al Plan instead of Neighbourhood Plans. Plan instead of Neighbourhood Plans. Plan instead and effective. The ensure that the Local Plan is consistent an national policy set out in the NPPF at agraphs 14, 17 (bullet point 1), 47, 150 and in the consultation provides an opportunity for esconsultation provides an opportunity for	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			consultation to be carried out by the district council ahead of consideration at the examination. NOTE: this modification has been subject to original Sustainability Appraisal accompanying	
			the Submission Local Plan (see Part 3, Appendix 6),	
Chapter 8 Bui	lding a strong and	d competitive economy		
PM/SC/8/A	Add a new Policy E/1B: Cambridge Biomedical Campus Extension	NOTE: PROVISIONAL MODIFICATION to add a new Policy E/1B as follows: E/1B: Cambridge Biomedical Campus Extension 1. An extension to the Cambridge Biomedical Campus will be supported on land shown on the Policies Map for biomedical and biotechnology research and development within class B1(b) and related higher education and sui-generis medical research institutes. 2. Proposals for development should:	Positively prepared and justified. The Cambridge Inner Green Belt Boundary Study (November 2015) identifies land south of the Cambridge Biomedical Campus which could be released from the Green Belt for development without significant harm to Green Belt purposes. The Council considers that the need for jobs can comprise exceptional circumstances justifying a review of the Green Belt so far as this would not cause significant harm to Green Belt purposes. Whilst there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies and organisations, the findings of the new study	Main modification
		a. Create substantial and attractive	provide an opportunity to allocate land for an	

Proposed modification number	Policy / paragraph number / site reference		d modification to the ambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		b.	landscaped edges to the western, eastern and southern boundaries reinforcing existing planting on the southern boundary. Provide an appropriate landscaped setting for the Nine	extension to the Cambridge Biomedical Campus to provide high quality biomedical development on the edge of Cambridge with its locational benefits, without causing significant harm to the purposes of the Cambridge Green Belt. It would not be positive planning for the Local Plan policy to	
		c.	Wells Local Nature Reserve, and provide pedestrian access to the Reserve whilst mitigating visitor impacts. Demonstrate and ensure that there will be no material impact on the volume, pattern of flow or water quality of the chalk springs	prevent such development if it proves to be deliverable. Effective Proposed policy would provide an effective response to the employment issues relating to the Cambridge area and the circumstances of the site.	
		d.	at Nine Wells. Demonstrate that surface water flood risks can be appropriately managed and mitigated to avoid flood risks to the site and to not increase flood risks elsewhere.	Consistent with National Policy National policy requires Councils to consider whether there are exceptional circumstances for a Green Belt review through the local plan process.	
		e.	Have building heights which are no higher than those on the adjoining part of the Cambridge Biomedical Campus and which step down to the western, eastern and southern	p. 33330.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		f. Provide high quality new public realm and open space, and retain and incorporate existing watercourses. g. Include measures to enhance access to and within the Cambridge Biomedical Campus including for cyclists, pedestrians, wheelchair users and people with other disabilities, and mitigate impacts on the existing road network and parking in the surrounding area. h. Connect to the Addenbrooke's Hospital energy network, where feasible and viable. NOTE: There is a consequential amendment to the Policies Map to reflect this new employment allocation – refer to map at the		
PM/SC/8/B	Add supporting text to follow new Policy E/1B	end of this schedule. NOTE: PROVISIONAL MODIFICATION to add the following supporting text to new Policy E/1B: The Cambridge Biomedical Campus (CBC) is	To provide reasoned justification in the Local Plan to support the Main Modification PM/SC/8/A.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		an international centre of excellence for patient care, biomedical research and healthcare education. It plays a local, regional and national role in providing medical facilities and medical research. The local plan will support its continuing development as such, and as a high quality, legible and sustainable campus. It also reinforces the existing biomedical and biotechnology cluster in the Cambridge area.		
		Policy S/6 'The Development Strategy to 2031' sets out a spatial strategy for the location of new employment development, the preferred location being on the edge of Cambridge, subject to the purposes of the Cambridge Green Belt.		
		The Employment Land Review 2012 has identified a particular need for office space in or on the edge of Cambridge. Opportunities have been identified on the northern fringe of Cambridge at Cambridge Northern Fringe East and through densification of the Cambridge Science Park. On the southern fringe, the delivery of development of the CBC has been brought forward by the planned		

relocation of Astra Zeneca to the site.		
The Cambridge Inner Green Belt Boundary Study (November 2015), has looked at the whole inner Green Belt including land south of the CBC. It has concluded that development south of CBC could be undertaken without significant harm to Green Belt purposes provided that it avoid rising ground near White Hill, provide a setting for Nine Wells Local Nature Reserve, provide a soft green edge to the city and that new development be no more prominent in views from elevated land to the south east than the existing buildings at Addenbrooke's. The Council considers that the need for jobs can comprise exceptional circumstances justifying a review of the Green Belt so far as this would not cause significant harm to Green Belt purposes. Whilst there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies and organisations, the findings of the new study provide an opportunity to allocate land for an extension to the CBC to provide high quality biomedical development on the edge of		
	The Cambridge Inner Green Belt Boundary Study (November 2015), has looked at the whole inner Green Belt including land south of the CBC. It has concluded that development south of CBC could be undertaken without significant harm to Green Belt purposes provided that it avoid rising ground near White Hill, provide a setting for Nine Wells Local Nature Reserve, provide a soft green edge to the city and that new development be no more prominent in views from elevated land to the south east than the existing buildings at Addenbrooke's. The Council considers that the need for jobs can comprise exceptional circumstances justifying a review of the Green Belt so far as this would not cause significant harm to Green Belt purposes. Whilst there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies and organisations, the findings of the new study provide an opportunity to allocate land for an extension to the CBC to provide high quality	The Cambridge Inner Green Belt Boundary Study (November 2015), has looked at the whole inner Green Belt including land south of the CBC. It has concluded that development south of CBC could be undertaken without significant harm to Green Belt purposes provided that it avoid rising ground near White Hill, provide a setting for Nine Wells Local Nature Reserve, provide a soft green edge to the city and that new development be no more prominent in views from elevated land to the south east than the existing buildings at Addenbrooke's. The Council considers that the need for jobs can comprise exceptional circumstances justifying a review of the Green Belt so far as this would not cause significant harm to Green Belt purposes. Whilst there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies and organisations, the findings of the new study provide an opportunity to allocate land for an extension to the CBC to provide high quality biomedical development on the edge of

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		causing significant harm to the purposes of the Cambridge Green Belt. Addenbrooke's Hospital is to develop a new clinical waste facility (energy from waste) to replace an existing facility which will supply energy to the Cambridge Biomedical Campus as a whole. Developments within the site should, therefore, seek to connect to this energy network, subject to feasibility and viability. Cambridge University Hospitals NHS Trust (the Trust) has a strategic masterplan for the extended campus area which includes the following: • key routes and street hierarchy; • public realm strategy and open space; • building massing; • potential uses; • development phasing; and • sustainability. This site should be included in future updates to the strategic masterplan and the site developed having regard to its provisions.		

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		The Transport Strategy for Cambridge and South Cambridgeshire (2014) identifies a need to investigate the case for a new railway station in this area to serve the CBC and southern Cambridge. Should a need be demonstrated for a new station and if the preferred location is nearby, the layout of the site should allow for such provision. Nine Wells is a historically important site containing several chalk springs, which form the source of the Hobson Conduit. The reserve is a mix of woodland, scrub and		
		water. Previously a SSSI (Site of Special Scientific Interest) Nine Wells once contained some rare freshwater invertebrates, however following the drought of 1976 these were lost. Today the chalk watercourses are being managed with the aim of re-creating the conditions favourable for a possible reintroduction of these rare species. It is important that the chalk springs not be compromised in terms of their volume, pattern of flow or water quality.		
		Parts of the site have been identified as subject to surface water flood risks.		

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PM/SC/8/C	Policy E/2 Fulbourn Rd East	Amend the title of Policy E/2 as follows: Policy E/2: Fulbourn Road East (Fulbourn) 6.9 4.3 hectares NOTE: There is a consequential amendment to site area shown on the Policies Map - refer to map at the end of this schedule.	Positively prepared and justified. In response to the findings in the LDA Cambridge Inner Green Belt Boundary Study 2015 (See Sector 13), which recommended allocating a smaller site to minimise impact on the Green Belt.	Main modification
PM/SC/8/D	Paragraph 8.54	Amend supporting text to Policy E/14 to read as follows: Employment sites at villages are a scarce resource, which should be retained. Making best use of existing employment sites reduces the pressure for development of new sites, including new sites in the countryside. It also provides a greater range of employment opportunities and reduces the need to travel. Sites should be retained to provide local employment, unless specific factors indicate otherwise. The policy does not apply where the change of use is permitted development.	Consistent with National Policy 25 March 2015 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) - This Written Ministerial Statement outlines the Government's policy on change of use which supports brownfield regeneration – new permitted development rights were brought forward including allowing change of use between shops and financial and professional services, change of use from business to residential etc. The supporting text to Policy E/14 needs to be modified to clarify that the policy does not apply where the changes of use is permitted development following on from the changes brought forward in the Written Ministerial Statement.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
			Minor modification to ensure clarification and consistency with changes to permitted development rights.	
Chapter 9 Pro	omoting Successf	ul Communities		
PM/SC/9/A	Paragraph 9.65	Update paragraph 9.65 to include new regulations: Under the present system of controls over hazardous development and over development within the vicinity of hazardous installations, the activities and substances (and quantities) to which the above statements apply are those defined by the Planning (Hazardous Substances) Regulation 1992, the Planning (Control of Major Accident Hazards) Regulations 1999 and referred to in the Department of the Environment Circular 04/00 "Planning Controls for Hazardous Substances" which will be replaced with revised guidance within the lifetime of the Plan. The Planning (Hazardous Substances) Regulations came into force on 1 June 2015. set out in the web based planning practice guidance (PPG) in a specific section on	Consistent with National Policy The web-based planning practice guidance was published 6 March 2014 as the local plan was submitted for examination. There is a specific section about hazardous substances. http://planningguidance.planningportal.gov.uk/ blog/guidance/hazardous-substances/ 25 March 2015 – Written Ministerial Statement from the Secretary of State for Communities and Local Government (Eric Pickles) - This Written Ministerial Statement contained updates on a number of topics including hazardous substances to reflect new regulations that were introduced on 1 June 2015. The modification allows for updates via the planning practice guidance. Minor modification to provide clarity.	Minor modification

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		new regulations are implemented.		
Chapter 10 Pr	omoting and Deli	vering Sustainable Transport and Infrastructu	re	
PM/SC/10/A	New paragraph after 10.42	New paragraph to be added after paragraph 10.42: There are some forms of development where contributions will not be sought as set out in planning practice guidance. These include custom and self-build housing schemes as well as starter homes.	Consistent with National Policy The web-based planning practice guidance was published 6 March 2014 as the local plan was submitted for examination. This includes a section relating to self build work being exempt from the Community Infrastructure Levy. http://planningguidance.planningportal.gov.uk/blog/guidance/community-infrastructure-levy/relief/self-build-exemption/ Minor modification to be consistent with national policy.	Minor modification
Glossary				
PM/SC/G/A	Glossary	 Add to terms to glossary: planning practice guidance (PPG) 	The web-based planning practice guidance was published 6 March 2014 as the local plan was submitted for examination.	Minor modification
		The web-based planning practice guidance is a planning information resource available online in a usable and	Minor modification to be consistent with national policy.	

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		accessible format to be read alongside the National Planning Policy Framework. It contains detailed information for users of the planning system previously only published in separate documents. DCLG are actively managing the planning practice guidance, and any necessary updates will be made as soon as regulations and legislation are brought into force. Starter Home Starter Home Starter home means a building or part of a building that: a) is a new dwelling, b) is available for purchase by qualifying first-time buyers only, c) is to be sold at a discount of at least 20% of the market value, d) is to be sold for less than the price cap, and e) is subject to any restrictions on sale or letting specified in regulations made by the Secretary of State.		
		(From Housing and Planning Bill October		

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		Self-build and Custom Housebuilding Self-build and custom housebuilding" means the building or completion by: a) individuals, b) associations of individuals, or c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals. But it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.		
		Right to Build Government initiative which creates a new 'Right to Build' giving custom builders a right to a plot of land from councils. Local Planning Authorities are to help local custom builders to find a		

Proposed modification number	Policy / paragraph number / site reference	Proposed modification to the South Cambridgeshire Local Plan	Reason for proposed modification	Main/minor modification
		suitable plot of land to build a new home. A register of individuals wishing to build their own home is to be kept. South Cambridgeshire District Council was one of the vanguard councils to pioneer the scheme.		
PM/SC/G/B	Glossary	Revise glossary definition of Gypsy and Traveller: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently but, excluding members of an organised group of travelling showpeople or circus people travelling together as such. Source: Planning Policy for Traveller Sites, 2015.	Consistent with National Policy On 31 August 2015, the Government published Planning Policy for Traveller Sites which should be read in conjunction with the National Planning Policy Framework. The new planning policy document redefines 'traveller' in planning policy to exclude those who no longer travel permanently. Minor modification to be consistent with national policy.	Minor modification

Modification PM/SC/2/G

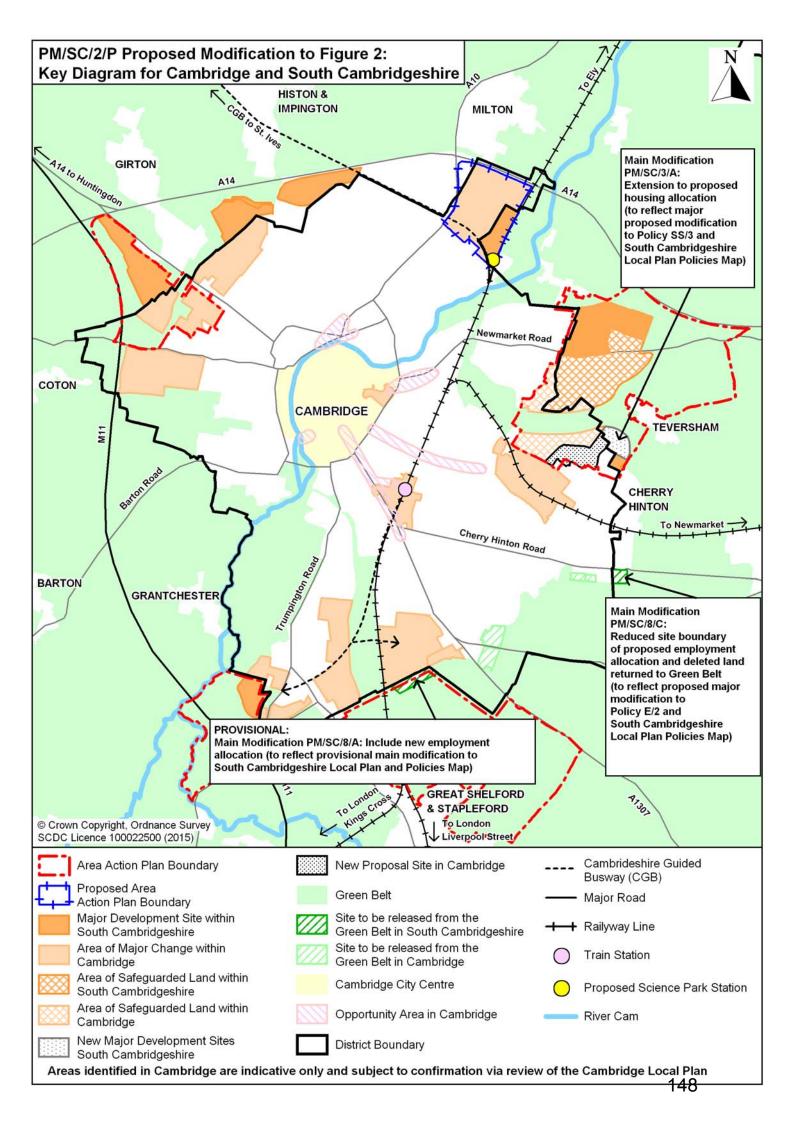
Paragraph 2.21 revised table:

	Existing Completions and Commitments (both areas)	New Sites Cambridge	New Sites South Cambs	TOTAL	%
Cambridge Urban Area	3,287 - <u>5,358</u>	3,324 <u>1,470</u>	0	6,611 6,282	20 - <u>19</u>
Edge of Cambridge	11,361 <u>11,370</u>	430 <u>890</u>	100 <u>410</u>	11,891 12,670	35
New Settlements and Cambourne West	5,965 - <u>3,445</u>	0	4,370 4,610	10,335 <u>8,055</u>	31 - <u>23</u>
Villages Rural Area (including windfalls)	3,853 - <u>7,284</u>	0	895 <u>936</u>	4,748 8,220	14 - <u>23</u>
TOTAL	24,466 <u>27,457</u>	3,754 <u>2,360</u>	5,365 <u>5,956</u>	33,585 35,773	100

Modification PM/SC/2/H

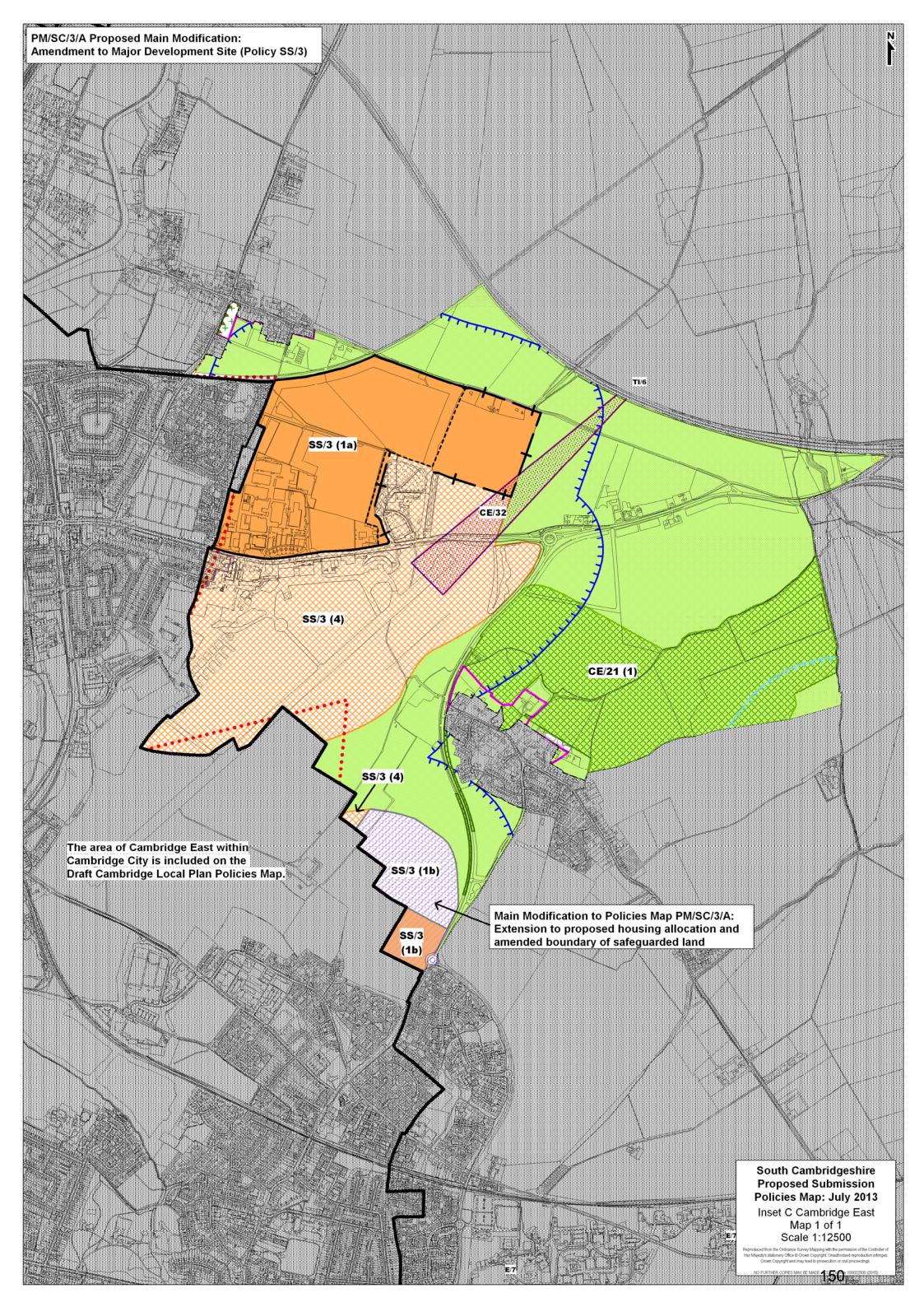
Paragraph 2.22 revised table:

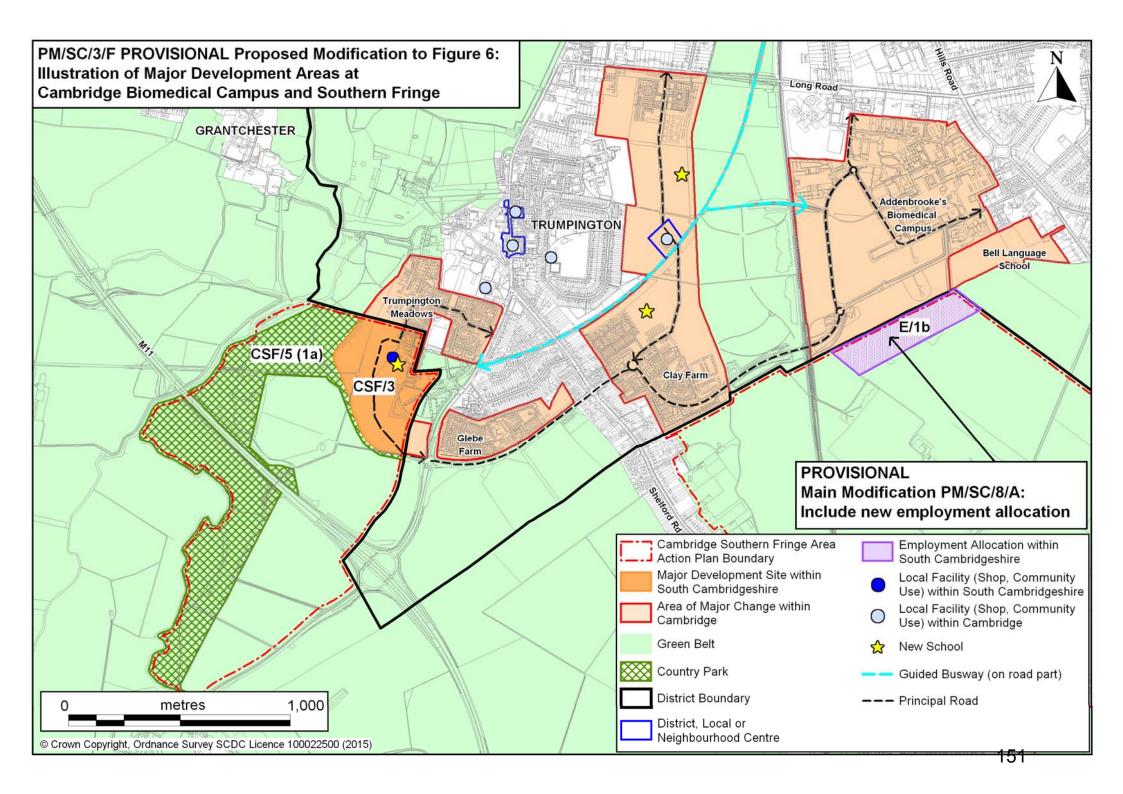
	Structure Plan 1999 to 2016	%	New Local Plan Strategy 2011 to 2031 (both areas)	%
Cambridge Urban Area	8,900	27	6, 611 <u>6,828</u>	20 19
Cambridge Fringe Sites	8,000	25	11,891 12,670	35
New settlements	6,000	18	10,335 8,055	31 23
Villages	9,600	30	4 ,748 <u>8,220</u>	14 <u>23</u>
TOTAL 1999 to 2016	32,500	100	33,585 - <u>35,773</u>	100

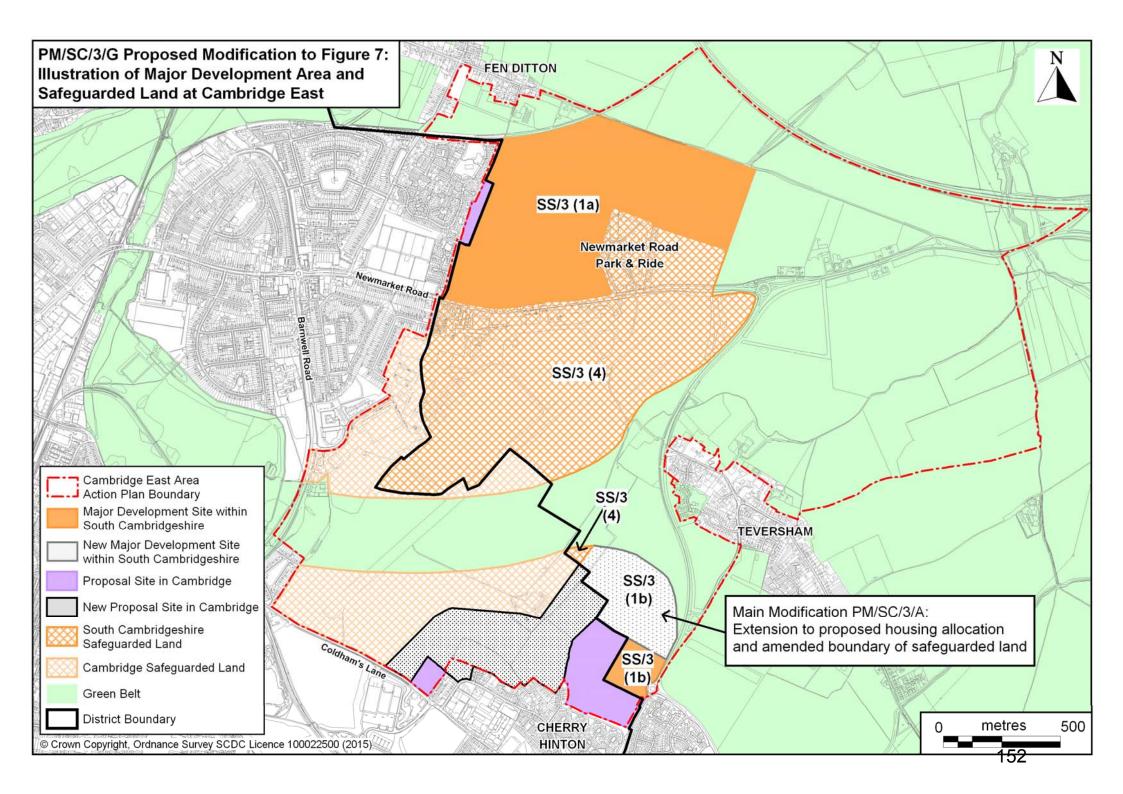


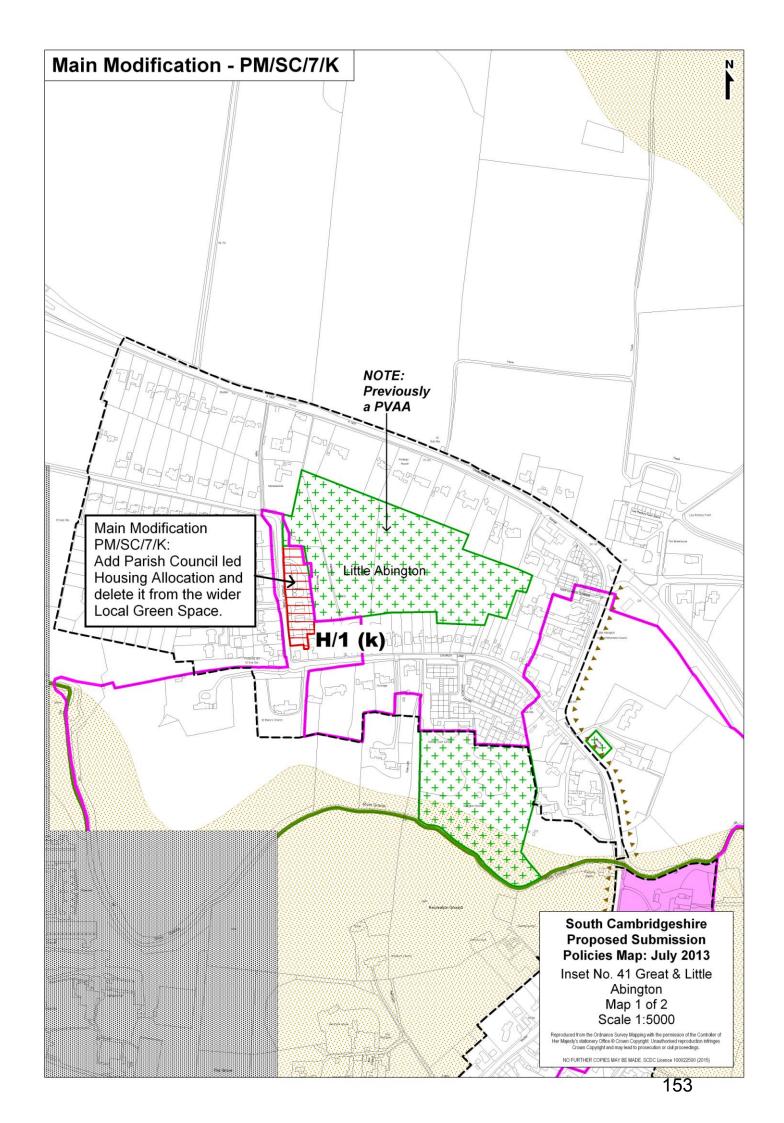
Modification PM/SC/2/W: Delete Figure 3: Housing Trajectory

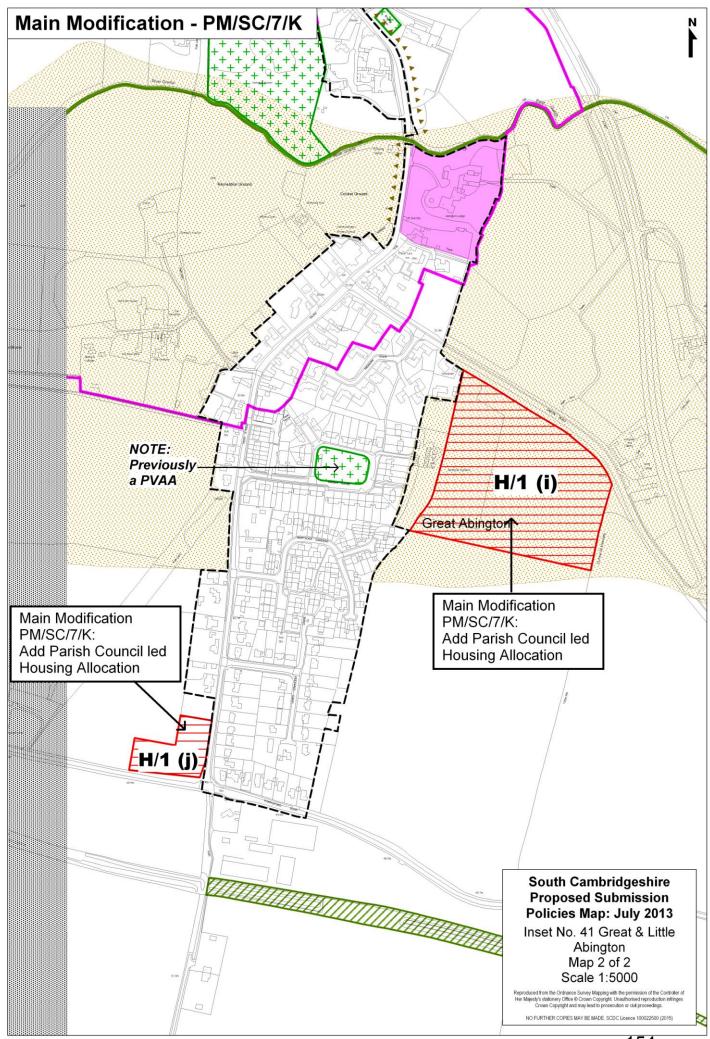
Figure 3: Housing Trajectory		HISTORIC & PROJECTED COMPLETIONS TOTAL														TOTALS								
			2011-	2012-	2013-	2014-	2015-	2016-	2017-	2018-	2019-	2020-	2021-	2022-	2023-	2024-	2025-	2026-	2027-	2028-	2029-	2030-		
			2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Post 2021	2011-2031
Historic Complet	ons	T	696	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-/	-	696
		Cambridge East	-	0	0	0	50	100	150	200	200	250	200	100	0	0	0	0	60	0	0	8	0	1,310
		North-West Cambridge Area Action Plan area	-	0	20	70	195	105	90	185	150	250	90	0	0	0	0	0	0	0	0	0	0	1,155
	Edge of Cambridge	Land between Huntingdon Road, Histon Road & A14 (NIAB 2)	-	0	0	0	0	0	0	0	150	300	250	200	0	0	0	0	0	0	0	0	0	900
Allocations		Orchard Park - parcel K1	-	0	0	23	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	36
without planning		Orchard Park - 3 additional land parcels including local centre	-	0	48	80	39	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	167
permission	Northstowe		-	0	0	65	175	215	310	400	400	400	400	400	400	400	400	400	400	400	400	400	3,535	5,965
		Fulbourn & Ida Darwin Hospitals	-	0	0	25	50	50	50	50	25	0	0	0	0	0	0	0	0	0	0	0	0	250
		Papworth Everard West Central	-	0	2	12	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	74
		North of Impington Lane, Impington (northern part of site)	-	0	0	0	0	0	0	0	0	0	0	0	0	0 /	0	0	0	0	0	0	0	0
		Trumpington Meadows (Cambridge Southern Fringe)	-	0	0	29	0	0	100	103	120	100	75	10	0	0	0	0	0	0	0	0	0	537
		Orchard Park - parcels H1 & G	-	34	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	50
		Cambourne	-	39	4	0	0	0	0	0	0	0	0	0 /	0	0	0	0	0	0	0	0	0	43
		Cambourne (additional 950 dwellings)	-	80	120	145	140	160	85	60	105	55	0	0	0	0	0	0	0	0	0	0	0	950
Fortable or Born		Bayer Cropscience	-	0	30	60	60	60	60	15	0	0	0	0	0	0	0	0	0	0	0	0	0	285
Existing Permiss	ions	North of Impington Lane, Impington (southern part of site)	-	31	0	0	0	0	0	0	0	0 /	0	0	0	0	0	0	0	0	0	0	0	31
		Historic Rural Allocations with planning permission	-	169	145	63	63	53	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	510
		Other Estate-level sites	-	74	138	69	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	281
		Small Sites Already Under Construction	-	77	25	0	0	0	0	0 /	0	0	0	0	0	0	0	0	0	0	0	0	0	102
		Small Sites Not Under Construction	-	25	70	100	55	31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	281
Planning application	ons for 9 or more dwellings anding issues (at March 201	where decision to grant planning permission but awaiting	-	0	82	60	49	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	221
		SCA Packaging, Villa Road, Impington	-	0	0	36	36	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	72
	in Issues & Options that mission or resolution to	London Road, Great Shelford & Granta Terrace, Stapleford	_	0	0	0	22	44	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	66
	mission (since April 2012)	Land at junction of Long Drove & Beach Road, Cottenham	_	0	30	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	47
Projected Comple	etions Total		-	529	730	854	977	878	862	1,013	1,150	1,355	1,015	710	400	400	400	400	460	400	400	400	3,535	13,333
	C AND PROJECTED COMP	DI ETIONS 2011 2021	696	529	730	854	977	878	862	1,013	1,150	1,355	1,015	710	400	400	400	400	460	400	400	400	3,535	14,029
TOTAL: HISTORIA	S AND PROJECTED COMP	-LETIONS 2011-2031	030	525	131	034	311	0/0	002	1,013	1,150	1,355	1,015	710	400	400	400	400	460	400	400	400	3,535	14,029
		NIAB 3	-	8	0	0	0	0	0	0	0	0	0	0	100	0	0	0	0	0	0	0	0	100
		Northstowe Reserve	-/	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Strategic Sites	Waterbeach New Town	_	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100	200	300	400	400	6,600	1,400
		Bourn Airfield New Village	-	0	0	0	0	0	0	0	0	0	0	60	100	220	220	220	220	220	220	220	1,800	1,700
		Land west of Cambourne (Swansley Wood)		0	0	0	0	30	70	100	150	150	150	150	150	150	100	0	0	0	0	0	0	1,200
		Dales Manor Business Park, Sawston	-	0	0	0	0	0	20	60	60	60	0	0	0	0	0	0	0	0	0	0	0	200
New Allocations		Land south of Babraham Road, Saweton	-	0	0	0	0	0	0	0	0	35	35	40	40	45	40	25	0	0	0	0	0	260
		Land north of Babraham Road, Sawston	-	0	0	0	0	0	20	40	20	0	0	0	0	0	0	0	0	0	0	0	0	80
	Will 014	Land north of Impington Lane, Impington	-	0	0	0	0	10	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
	Village Sites	Land west of New Road, Melbourn	-	0	0	0	0	40	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	65
		Green End Industrial Estate, Gamlingay	-	0	0	0	0	0	0	0	0	30	30	30	0	0	0	0	0	0	0	0	0	90
		Land at Bennell Farm, West Street, Comberton	-	0	0	0	0	30	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	90
		East of Rockmill End, Willingham	-	0	0	0	0	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	50
New Allocations Total		-	0	0	0	0	135	205	230	230	275	215	280	390	415	360	345	420	520	620	620	8,400	5,260	
OVERALL TOTAL			696	529	730	854	977	1,013	1,067	1,243	1,380	1,630	1,230	990	790	815	760	745	880	920	1,020	1,020	11,935	19,289
Comparison again	st annualised average of 95	50 dwellings	-254	-421	-220	-96	27	63	117	293	430	680	280	40	-160	-135	-190	-205	-70	-30	70	70	-	
Windfalls			-	0	0	0	50	50	200	200	200	200	200	200	200	200	200	200	200	200	200	200	-	2,900
								· ·					1				1	1						

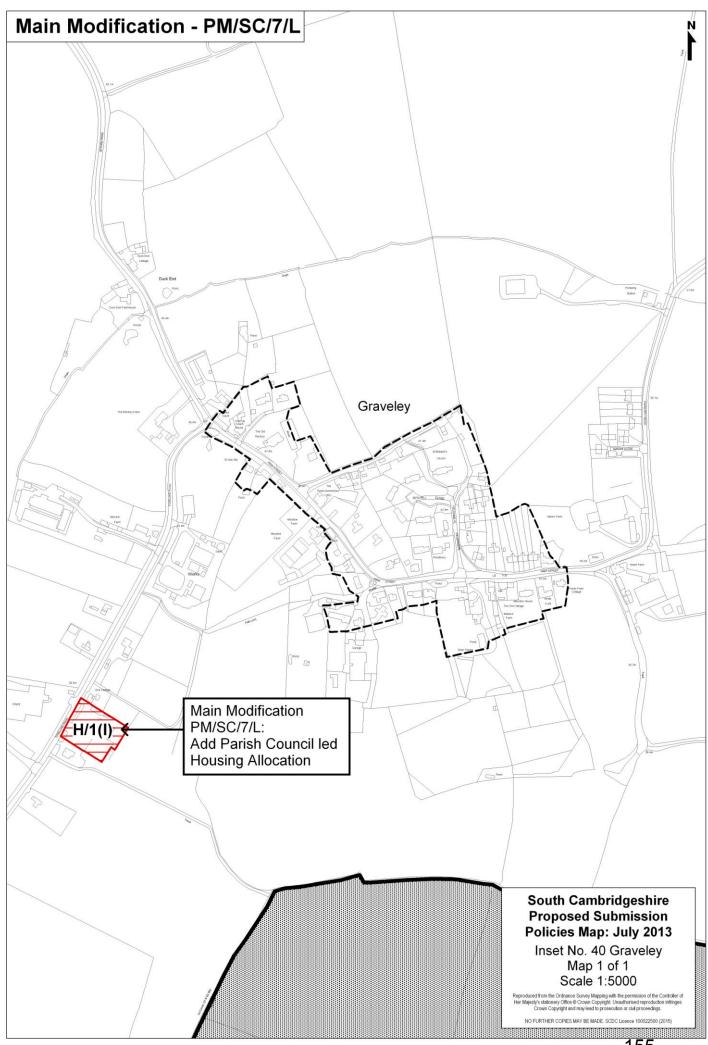


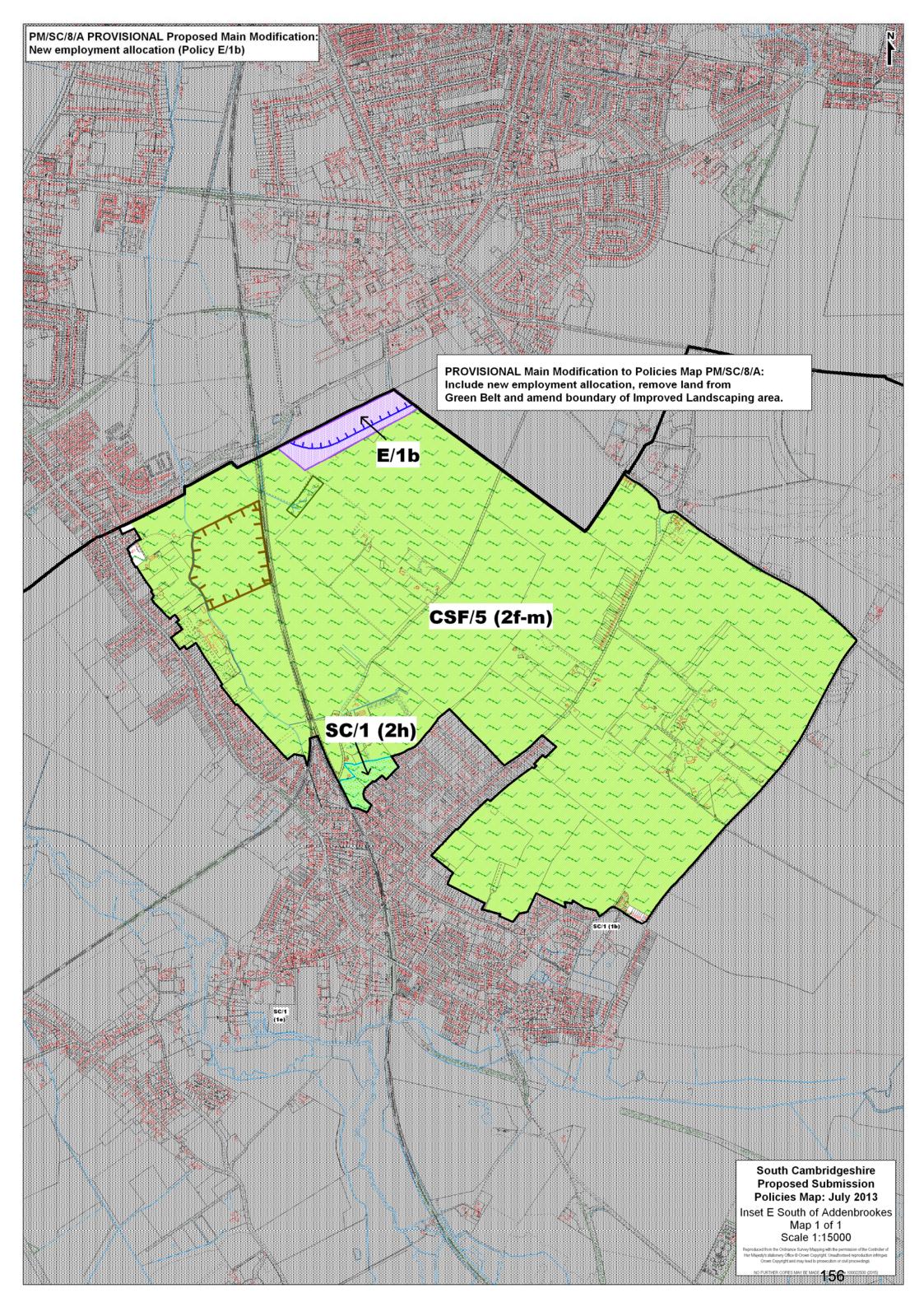


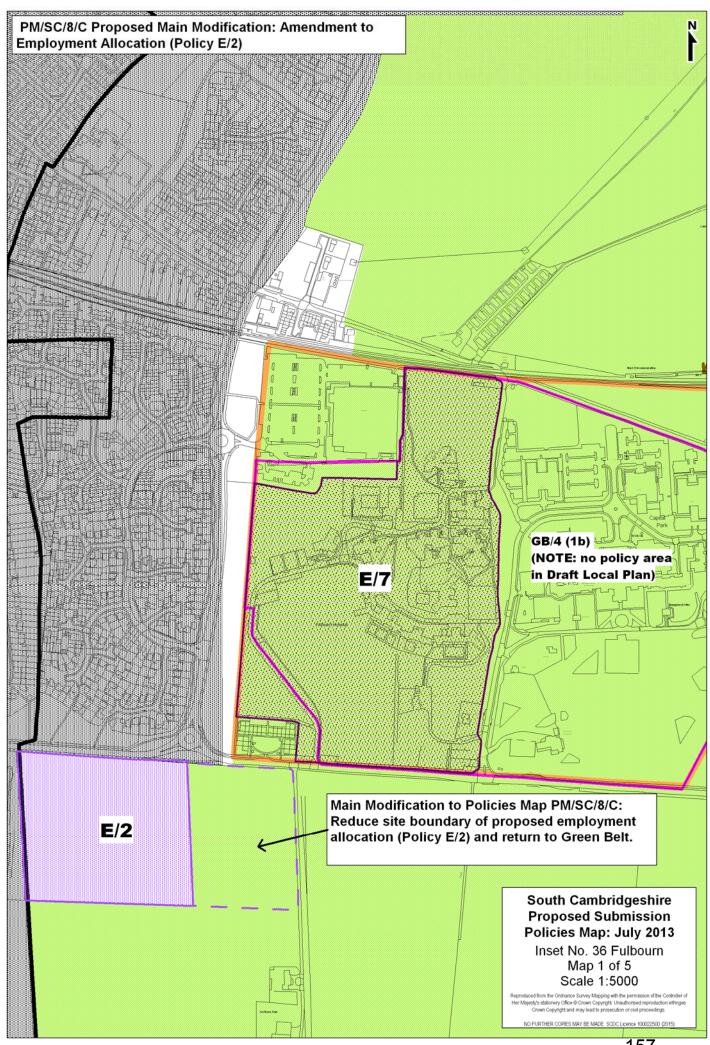












LOCAL PLAN EXAMINATIONS CAMBRIDGE CITY and SOUTH CAMBRIDGESHIRE

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Our Ref: CCC/SCDC/Insp/Prelim

Your Ref:

20 May 2015

Mrs S Saunders Planning Policy Manager Cambridge City Council

Mrs C Hunt Planning Policy Manager South Cambridgeshire District Council

Dear Mrs Hunt and Mrs Saunders

Cambridge City Local Plan Examination and South Cambridgeshire District Local Plan Examination

At the Joint Pre Hearing Meeting we indicated that we would advise you of any serious concerns as soon as possible, rather than waiting for the end of the examinations hearings. Having now held hearing sessions on issues relating to the development strategy, Green Belt, transport and housing delivery, we have identified some issues which we consider need to be addressed at an early stage. In accordance with the wishes of the Councils, and the general guidance for civil servants regarding controversial issues in the pre-election period, we have not been able to provide this letter at an earlier date. These comments should be considered as preliminary conclusions and are made without prejudice to the content of our final report.

Overall development strategy

The Cambridge and South Cambridgeshire Sustainable Development Strategy Review (SDSR)(RD/Strat/040) states that "the main aim of the existing development strategy in adopted plans is to enable genuinely sustainable development that balances economic, social and environmental needs". It notes that this is the central purpose of the planning system as set out in the National Planning Policy Framework, and that existing development plan proposals which remain deliverable will be carried forward into the updated plans. It further states that the question for the (local plan) reviews is the extent to which <u>additional</u> (our emphasis) development allocations contribute to this overarching objective.

Section 4 of the SDSR outlines the existing approach to the location of development and considers how each of the options performs against the sustainability considerations set out in section 3 of the document. Amongst other things it is noted that locating development on the urban edge has significant advantages in sustainability terms and that key considerations in assessing the suitability of specific locations will be any potential conflict with Green Belt purposes and the deliverability of infrastructure improvements. The consideration of new settlements finds that "depending on their overall scale new settlements should be sustainable due to their self- containment..." However, the assessment notes the various challenges to the delivery of self-contained settlements and that out-commuting to workplaces and other facilities and services is likely.

The National Planning Policy Framework affords a high degree of protection to the Green Belt. The letter from Nick Boles MP to Sir Michael Pitt dated 3 March 2014 notes that it has always been the case that a local authority could adjust a Green Belt boundary through a review of the Local Plan. The letter goes on to state that it must always be transparently clear that it is the local authority itself which has chosen this path. In the case of Cambridge City and South Cambridgeshire District the two authorities have individually and jointly undertaken a review of the inner Green Belt boundary during the course of plan preparation and concluded that a very small number of sites should be released to meet housing and employment needs.

A number of respondents have questioned the methodology employed in the Green Belt Review and we have found it difficult, in some cases, to understand how the assessment of 'importance to Green Belt' has been derived from the underlying assessments of importance to setting, character and separation. For example, sector 8.1 is given a score of 'high' with regard to importance to setting, and 'medium' with regard to importance to both character and separation, but the importance to Green Belt is then scored as 'very high'. Sector 8.2 is given a score of 'low' for importance to both setting and character, and 'negligible' in relation to separation but yet is given an overall score of 'medium'. These areas are referenced only as examples of the methodology, not as any indication that we consider that they are suitable for development.

Whatever the shortcomings of the Green Belt Review may be, the Councils accept that it does not take account of the need to promote sustainable patterns of development, as required by paragraph 85 of the National Planning Policy Framework. In response to our question on this point under Matter 6Aiii, the Councils indicated that this requirement had been taken into account in the wider evidence base across a range of documents. Following a further request the Councils provided a more detailed Note of where this information could be found. The Note provides more detailed references across a significant number of documents, but this kind of paper trail does not aid clear comprehension and we have found it difficult to understand how the various dimensions of sustainable development were assessed in accordance with the requirements of paragraph 85 of the National Planning Policy Framework.

It might be expected that such an exercise would be carried out through the SEA/SA process. However, larger releases of Green Belt land to meet development needs were rejected at an early stage in the process of sustainability appraisal. No further consideration was given to a number of proposals for development on the urban edge on the grounds that these could not be considered as reasonable alternatives. Bearing in mind the conclusions of the SDSR and the apparent shortcomings of the Green Belt

Review (see above) we have significant concerns regarding the robustness of the SEA/SA process.

The assertion that 55% of the housing requirement of both Councils from 2011 to 2031 will take place in the urban area or the edge of Cambridge can only be demonstrated by including commitments carried forward from previous Plans. If the allocations that are new to these Plans are considered, then the figures, taken from paragraph 2.21 of the South Cambridgeshire Local Plan, are as follows:

Sites in the urban area	3,324	36%
Sites on the edge of the urban area	530	6%
New Settlements	4,370	48%
Villages	895	10%

A situation where almost half of new allocations are at the third tier of the sequence does not appear to support the contention that the Plans accord with the SDSR.

Of course, the SEA/SA process is not a wholly mechanistic one, as much depends on the weight to be given to the various dimensions of sustainability. It may be that the Councils take the view that protection of the Green Belt should outweigh other considerations. In our view, however, the way in which weight has been attributed in coming to that decision should be clearly set out without the need to trawl through so many documents. In addition, if the Green Belt is to be protected, the plans should make it clear that the Sustainable Development Strategy will not be pursued beyond the completion of existing commitments and the very limited releases of Green Belt proposed through the Plans currently under examination.

Furthermore, 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. Evidence presented to the Examination so far indicates that there is a significant funding gap in relation to infrastructure provision. In some cases, the ways in which infrastructure requirements will be met are still at a very early stage of consideration. For example, at the hearing into Matter 7 it was suggested that the segregated bus link to serve proposed development at Bourn Airfield (policy SS6) may be pursued via an off-line route, but little work has yet been done on the feasibility of, or options for, such a scheme. The likely difficulties of land assembly, apart from any other considerations, could well have significant implications for cost and timing which are as yet unknown. We are aware that this development is not expected to come forward until the latter part of the plan period (post 2022) and that an AAP is to be prepared. Nonetheless, the lack of evidence available at this stage does not provide any reassurance that the Plans will deliver sustainable development bearing in mind the reservations expressed in the SDSR. It was also suggested that some development could come forward at Bourn in advance of the provision of the segregated bus route but the Councils were unable to say how much could be provided in advance of the infrastructure requirements identified in Policy SS6.

To summarise, we are concerned that an apparent inconsistency between the SDSR and the Plans' reliance on meeting development needs in new settlements may lead to a finding of unsoundness. Without further work we are not confident that we could recommend modifications to overcome these concerns.

Objectively assessed need for new housing

The SHMA methodology for assessing the need for new housing is not entirely consistent with Planning Practice Guidance, as it does not use national household populations as the starting point for the assessment. However, the Councils have explained that the national household projections for the Cambridge area are implausibly low due to the migration methodology used. A number of representors have concurred with this view, even though they may not agree with the final figures in the SHMA assessment (14,000 new homes in Cambridge City and 19,000 in South Cambridgeshire). Alternative assessments of need, using different methodologies, have been promoted by some representors and these indicate that the level of need may be around 43,000 new homes across the two authorities. Planning Practice Guidance notes that no single approach will provide a definitive answer. In these circumstances, it may be concluded that the SHMA Assessment is at the lower end of the likely range of possible levels of need to 2031. However we are concerned, in particular, that the Councils approach to the establishment of the full objectively assessed need has not fully taken into account the advice in the Planning Practice Guidance regarding market signals, particularly in relation to affordability.

From the discussion at the hearing, it seems to be generally accepted that there is a chronic shortage of affordable housing in Cambridge, even taking into account the Councils' recent updating of the SHMA following the review of the housing registers. There is no evidence before us that the Councils have carried out the kind of assessment of market signals envisaged in the Guidance; or considered whether an upward adjustment to planned housing numbers would be appropriate. It is not, in our view, adequate simply to express doubts as to whether such an upward adjustment would achieve an increase in the provision of affordable housing (which appeared to be the approach taken by the Councils at the hearing), or to suggest, as in the Councils' Matter 3 Statement, that this could only be tackled across the HMA, rather than in individual districts. 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.

The DCLG 2012-based household projections were published in late February 2015 after the relevant hearing had taken place and notwithstanding the comments in your Matter 3 statement that these projections would not have any implications for objectively assessed housing need, we are asking you to consider whether the 2012 based household projections suggest a different level of need and if so, how big is the difference and does it indicate that further modifications should be made to the Plans. We will also be seeking the views of those who made relevant representations on this issue.

Conformity with Revisions to National Planning Policy

You will be aware of two recent Written Ministerial Statements (WMS). The WMS by Brandon Lewis MP dated 28 November 2014, and consequential amendments to Planning Practice Guidance, has implications for the provision of affordable housing on small sites (less than 10 dwellings). Aspects of Policy 45 of the Cambridge City Local Plan and Policy H/9 of the South Cambridgeshire Local Plan do not appear to accord with the WMS.

The WMS dated 25 March 2015 by Eric Pickles MP, Secretary of State for Communities and Local Government, details Government Policy in relation to, amongst other things,

Housing Standards and car parking provision. Policies 27, 50, 51 of the City Plan and Policy H11 of the South Cambridgeshire Local Plan do not appear to accord with the WMS. This is not intended to be an exhaustive list of policies which may be affected by both of the WMS and we are therefore inviting the Councils to undertake a rigorous audit of both plans and propose modifications to ensure compliance with both WMS.

Next steps

In the circumstances, we consider that the best course of action would be for the Examinations to be suspended while the Councils revisit the sustainability appraisals so as to appraise all reasonable alternatives (including sites on the urban edge) to the same level as the preferred option, and to suggest modifications based on that work. For the avoidance of any doubt this letter should not be interpreted as an indication that further releases of Green Belt land would be necessary to ensure soundness. We envisage that further modifications would either align the plans with the SDSR; or more fully explain the reasons for departing from that Strategy together with a clearer and more fully evidenced explanation of how the challenges of delivering sustainable development in the proposed new settlements will be met. During the suspension further work could be undertaken on the other issues raised in this letter.

We recognise that the Councils will be disappointed by these preliminary conclusions but we look forward to hearing how you wish to progress together with a timetable for undertaking the further work identified, including any periods of public consultation.

Laura Graham Alan Wood

Inspectors