

1. Introduction and Purpose

This is one of eight topic papers produced to inform the consultation on the Greater Cambridge Local Plan: First Proposals. The topic papers are:

- Strategy
- Climate Change
- Green Infrastructure
- Wellbeing and Social
- Great Places
- Jobs
- Homes
- Infrastructure

All of the papers can be found on the [Greater Cambridge Shared Planning website](#).

The topic papers set out how the preferred option for each policy under the relevant Local Plan 'Theme' has been developed. As such, the topic papers support and complement the First Proposals consultation document as they provide a detailed explanation of the basis for each preferred policy approach. The policies are presented in a consistent format in each paper with sufficient information to provide a comprehensive appreciation of the background to and development of the preferred option. The content and structure for each policy option is:

- the issue the plan is seeking to respond to;
- the national, regional and local policy context that informs how the plan should address the issue;
- how consultation and engagement have informed the policy's development;
- the evidence that has informed the preferred policy option;
- the proposed policy approach and reasons why this is preferred, including alternative options considered; and
- further work and next steps.

A Local Plan must be informed by consultation and engagement as well as statutory processes, such as Sustainability Appraisal and Habitats Regulations Assessment, and the requirements of national planning policy. These important elements of plan-making have, therefore, informed development of the First Proposals for the Local Plan and are the subject of separate reports, and are also available on the [Greater Cambridge Shared Planning website](#). These form part of the overall consultation and are summarised below.

Greater Cambridge Local Plan Statement of Consultation

The Statement of Consultation sets out how the Councils have undertaken consultation, and propose to undertake consultation, in preparing the Greater Cambridge Local Plan.

The Statement will be updated at each stage of the plan making process; the current version supports the First Proposals stage.

The approach to Local Plan consultation is founded on the Councils' [Statement of Community Involvement](#). This sets out how and when we will involve the community and key stakeholders in preparing, altering and reviewing our plans and guidance for future development. It also explains how we will involve the community in planning applications.

The current version of the [Statement of Consultation](#) provides details of the consultation and engagement we have undertaken to date. This includes events before and after the first formal consultation on the plan, as well as details of the formal consultation itself, known as The First Conversation. The Statement summarises what have you told us so far and how we have taken this into account in developing the Local Plan.

Greater Cambridge Local Plan Sustainability Appraisal

A sustainability appraisal is a systematic process required by law that must be carried out during the preparation of a local plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. Sustainability appraisal should be applied as an ongoing process informing the development of the plan throughout its preparation.

Reasonable alternatives are the different realistic options considered in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan.

A Sustainability Appraisal Scoping Report was subject to consultation alongside the First Conversation in January 2020. A sustainability appraisal was also completed on the First Conversation. In November 2020 an appraisal was carried out to inform the testing of development strategy options. These reports can be found on the Greater Cambridge Shared Planning website in the [document library](#) section.

The Greater Cambridge Local Plan First Proposals Sustainability Appraisal report has now been published, which considers the proposals and option identified in the

First Proposals report. It includes a non-technical summary of the information, providing a clear and accessible overview of the process and findings.

The sustainability appraisal report sets out the reasonable alternatives considered as the plan has evolved, including the preferred approach in each case, and assesses these against the baseline environmental, economic and social characteristics of the area.

Greater Cambridge Local Plan Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) refers to a process which must be undertaken by law to determine if a plan or project may affect the protected features of a habitats site. European Sites and European Offshore Marine Sites are referred to as 'habitats sites' in national planning policy.

All plans which are not directly connected with the conservation management of a habitat site require consideration of whether the plan or project is likely to have significant effects on that site. This consideration should take into account the potential effects both of the plan/project itself and in combination with other plans or projects.

If a proposed plan or project is considered likely to have a significant effect on a protected habitats site then an appropriate assessment of the implications for the site, in view of the site's conservation objectives, must be undertaken. An appropriate assessment for a local plan should consider the impacts on sites and confirm the suitability or likely success of mitigation measures.

The HRA process began in 2020 with the publication of the HRA Scoping Report alongside the First Conversation in January 2020, which identified European sites with potential to be affected by the Local Plan. In November 2020 an assessment of the strategic spatial options was published. These reports can be found on the Greater Cambridge Shared Planning website in the [document library](#) section.

An HRA has now been carried out of the proposals in the First Proposals Report, and published to accompany the consultation.

Greater Cambridge Local Plan Duty to Cooperate: Statement of Common Ground

The purpose of the Greater Cambridge Local Plan Duty to Cooperate Statement of Common Ground is to set out the main areas of common and uncommon ground with relevant partners on strategic cross-boundary matters. It also forms part of the evidence required to demonstrate that the Councils have complied with the duty to cooperate in preparing the local plan.

The Statement of Common Ground responds to the requirement in national planning policy and guidance that strategic policy-making authorities are expected to document the activities undertaken when in the process of addressing strategic cross-boundary matters whilst cooperating. These will include the following matters that should be tailored to address local circumstances:

- working together at the outset of plan-making to identify cross-boundary matters which will need addressing;
- producing or commissioning joint research and evidence to address cross-boundary matters;
- assessing impacts of emerging policies; and
- preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated.

The Statement of Common Ground is intended to provide the outcome at a point in time of the ongoing cooperation with relevant bodies regarding strategic cross-boundary matters. It is intended to be a concise sign-posting document. It is closely related to the First Proposals Duty to Cooperate Statement of Compliance and to the First Proposals Statement of Consultation.

Greater Cambridge Local Plan Equalities Impact Assessment (EQIA)

The Public Sector Equality Duty, introduced under the Equality Act 2010, requires all public bodies, including Councils, to have due regard to the need to eliminate unlawful discrimination, harassment, and victimisation; advance equality of opportunity between those who share a protected characteristic and those who do not; and foster good relations between those who share a relevant protected characteristic and those who do not.

An EQIA provides a methodical approach to the assessment of impacts across the protected characteristics set out in legislation. An assessment should be completed during the development and review of all Council policies, strategies, procedures, projects or functions.

EQIA was carried out at the First Conversation stage at January 2020, and in relation to the testing of strategic options in November 2020. These reports can be found on the Greater Cambridge Shared Planning website in the [document library](#) section.

The Greater Cambridge Local Plan First Proposals Report Equalities Impact Assessment has now been prepared to provide an assessment of the policies and proposals in the consultation.

2. Overall Context for Homes

Background

The Greater Cambridge Local Plan First Conversation consultation in 2020 identified homes as one of the key themes for the new local plan to address. The consultation identified key issues relating to:

- How many homes we should be planning for;
- Diverse housing for diverse communities;
- How should we meet the need for additional Gypsy, Traveller and caravan sites; and
- Housing quality.

We asked questions about how the Local Plan should help to meet our needs for the amount and types of new homes, and whether we should plan for a higher number of homes than the minimum required by government to provide flexibility to support the growing economy. The housing requirement is addressed in the Strategy Topic Paper. It also asked what kind of housing we should provide, how we should meet the need for additional Gypsy and Traveller pitches and caravan sites, and how we should ensure a high standard of housing is built in our area.

We published the results of the consultation in September 2020, and all the feedback received can be found on the [First Conversation consultation results page](#) on our website.

We published our initial evidence findings in November 2020 relating to different development strategy choices available to the Local Plan, and we held some workshops with stakeholders on these issues.

Since then we have prepared a range of further evidence studies relating to the homes theme, as well as considering and responding to the responses and feedback we have received up to this point.

Proposed Approach

The following proposed policy areas are addressed in this topic paper. For each of these, further detail is provided on the national, regional and local policy context, the consultation and engagement undertaken, the evidence informing it, the proposed approach and reasons for its selection, and details of further work on the issue that will be undertaken for future stages of the plan making process.

H/AH: Affordable Housing

H/ES: Exception Sites for Affordable Housing

H/HM: Housing Mix

H/HD: Housing Density

H/GL: Garden land and subdivision of existing plots

H/SS: Residential Space Standards and accessible homes

H/SH: Specialist Housing and homes for Older People

H/CB: Self and Custom Build Homes

H/BR: Build to Rent Homes

H/MO: Houses in Multiple Occupation (HMOs)

H/SA: Student Accommodation

H/DC: Dwellings in the Countryside

H/RM: Residential Moorings

H/RC: Residential Caravans

H/GT: Gypsy and Traveller and Travelling Show People sites

H/CH: Community led housing

3. Further Work and Next Steps

Taking account of feedback received, the next steps for plan making include developing fully worked up policies in the draft Local Plan for consultation at the next stage of plan making.

As the Local Plan is prepared more up to date evidence on the need for affordable housing, particularly in rural communities, will be included where available.

Government progress on implementing First Homes exceptions sites policy will be monitored and changes to the Greater Cambridge Exception Sites for Affordable Housing preferred approach will be amended if required.

The Councils may need to review their preferred approach to 'accessible and adaptable' dwellings, depending on the outcome of the Government's consultation on the accessibility of new dwellings and any changes to Building Regulations.

The Councils will also continue to develop evidence regarding the implementation of residential space standards.

The Councils are working on a project to better understand the needs of people who need to move to wheelchair accessible housing. The Councils will work alongside the SEND (Specialist Education Needs and/or Disabilities) Specialist Housing advisors and the Disability Social Care Service. The project includes looking at the size and locations of the homes needed, when they are likely to be needed, and the likely future demand in Greater Cambridge. The Councils will aim to have collected and analysed their data by March 2022 to inform the preparation of the new draft Local Plan.

Cambridgeshire County Council are currently considering the future provision of accommodation based care for older people in Cambridgeshire and Peterborough, and are forecasting future demand on an individual district basis taking account of existing supply, projected population changes, and the changing way that care is provided by supporting more independent living and providing care based on the individual level of need and as required. Therefore, as part of the preparation of the draft version of the Greater Cambridge Local Plan, the Councils will consider the findings of this study, and use this along with the existing evidence to inform the development of its planning policies for specialist accommodation.

Further work with the higher-education institutions in Cambridge will be undertaken to identify their student accommodation growth needs over the next ten years, including the different types of accommodation such as self-contained accommodation for post-graduate students and their families.

Although the Councils have commissioned RRR Consultancy to undertake an Accommodation Needs Assessment (ANA) of Gypsies, Travellers, Travelling Showmen and Bargee Travellers and other Caravan and Houseboat Dwellers in the

Cambridge Sub-Region Housing Market Area, this study has not yet been completed as the coronavirus pandemic has delayed the completion of the face-to-face survey elements of the assessment. The study is expected at the end of 2021. Therefore, as part of the preparation of the draft version of the Greater Cambridge Local Plan, the Councils will consider and respond to the findings of the study in relation to the provision of residential moorings, sites for residential caravans, Gypsy and Traveller pitches, and Travelling Showpeople plots.

The First Proposals consultation provides another opportunity for potential sites for Gypsies and Travellers and Travelling Showpeople to be suggested for consideration through the local plan process.

4. H/AH Affordable Housing

Issue the Plan is Seeking to Respond to

We need to plan for market and affordable homes that meet the varied needs of our communities, from students to older people, and ensure that those who need specialist housing, or are vulnerable, can find a home that is right for them.

Policy Context

National Context

Paragraph 62 of the [National Planning Policy Framework](#) (NPPF 2021) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, and reflect the results of this assessment in their planning policies. The NPPF 2021 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations. Paragraphs 63-65 of the NPPF 2021 state that where a need for affordable housing is identified that planning policies should:

- specify the type of affordable housing required,
- expect that the affordable housing is provided on-site,
- only seek affordable housing on major developments (defined as being sites of 10 or more dwellings),
- allow a proportionate reduction to the affordable housing contribution where vacant buildings are being re-used or re-developed, and
- expect at least 10% of all homes on a major development to be available for affordable home ownership unless the development is solely for build to rent, specialist accommodation, self or custom build homes, or affordable housing.

Paragraph 58 of the NPPF 2021 sets out that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable, and that it is for the applicant to demonstrate that there are particular circumstances that justify the need for a viability assessment at the planning application stage.

Affordable housing is defined in the Glossary of the NPPF 2021 as “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)” and which complies with the specific definitions included in the glossary for affordable housing for rent, starter homes, discounted market sales housing, and/or other affordable routes to home ownership.

New national planning guidance on [First Homes](#) was published in May 2021 to take account of the announcement of the delivery of First Homes in the [Affordable Housing Update Written Ministerial Statement](#). First Homes are a specific kind of discounted market sale housing that fall within the affordable housing definition. National planning guidance sets out that First Homes should account for at least 25% of affordable homes delivered on a development that is expected to provide affordable homes. There are specific criteria for the sale and purchase of First Homes, with the ability for local authorities to set additional local criteria. For the remaining up to 75% of affordable homes, the national guidance prioritises the delivery of social rent homes before any affordable rent and shared ownership homes, where this is set out in local planning policy.

National planning guidance sets out that First Homes can contribute towards delivering some or all of the at least 10% affordable home ownership products that should be provided on major developments that is set out in the NPPF 2021. The new national planning guidance on First Homes explains how the two requirements can work together, and provides worked examples of this.

Both Cambridge and South Cambridgeshire have been identified by the Government as [areas of high affordability pressure](#).

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023 and Annexes 1-8: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) aims to ensure that everyone has access to a suitable home and that homes are provided that are affordable to people on all incomes. It sets out that the Councils will prioritise the delivery of affordable housing for rent (with a preference to deliver social rent homes rather than affordable rent homes, where possible) as part of a wider mix of affordable housing on new developments. Where affordable rent homes are to be provided, to ensure rents are kept at affordable levels, the Councils have set out their expectations in terms of rents in the [Greater Cambridge Housing Strategy Annex 11: Setting of Affordable Rents](#) (Cambridge City Council and South Cambridgeshire District Council, June 2021).

The housing strategy sets out that the Councils will seek the following proportions of different tenures of affordable homes:

- Cambridge: 75% affordable housing for rent (social rent homes and / or affordable rent homes) and 25% intermediate tenures, and
- South Cambridgeshire: 70% affordable housing for rent (social rent homes and / or affordable rent homes) and 30% intermediate tenures.

The proportions recognise that intermediate tenure affordable homes (such as shared ownership homes) are required to support the delivery of affordable housing for rent through cross-subsidy, and that this needs to be factored into the viability of the overall affordable housing tenure mix. The introduction of First Homes will have implications on this cross-subsidy and therefore the proportions of the different affordable housing tenures that are likely to be secured.

The [Greater Cambridge Housing Strategy Annexe 10: Clustering and Distribution of Affordable Housing](#) (Cambridge City Council and South Cambridgeshire District Council, June 2021) sets out how any affordable homes for rent and shared ownership homes should be clustered and distributed in relation to each other and other intermediate and market tenures on any new developments, and how sizes and types of affordable homes should be grouped together. The guidance seeks to deliver fully integrated mixed tenure housing schemes, with a mix of unit sizes.

The [Greater Cambridge Housing Strategy Annexe 5: Summary of Requirements for Development of New Homes](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) sets out a recommended number of bedspaces for each dwelling size (number of bedrooms), so that affordable housing for rent homes are designed to accommodate different family compositions.

Affordable homes for rent are let through the Councils' choice based lettings scheme, known as 'Homelink', and are let in accordance with the Sub Regional Allocations Policy. Local Lettings Plans may also be sought on specific developments which set out guidelines and/or criteria governing which households can be allocated affordable homes on that specific development. Local Lettings Plans can be used to enable the creation of balanced and mixed communities and/or to support the local economy, or where lettings need to be sensitive to local circumstances.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) includes Policy 45: Affordable housing and dwelling mix that requires affordable homes to be provided on developments of 11 dwellings or more or where the total floorspace of the proposed dwellings exceeds 1,000 sqm. The policy requires 40% affordable homes on developments of 15 or more dwellings and 25% affordable homes on developments of 10-14 dwellings. The policy specifies that the affordable homes will be designed to be indiscernible from and well integrated with the market homes. The policy states that further guidance will be provided in a Supplementary Planning Document

The Council's planning committee in November 2018 agreed to apply a lower threshold of 10 dwellings or more to be consistent with the NPPF that had been revised during the preparation of the Local Plan.

The adopted South Cambridgeshire Local Plan (September 2018) includes Policy H/10: Affordable Housing that requires 40% affordable homes on developments of 11 dwellings or more or where the total floorspace of the proposed dwellings exceeds 1,000 sqm. The policy sets out that the mix of affordable tenures should be determined by local circumstances and that the affordable homes should be provided in small groups or clusters distributed throughout the site. The policy allows for some exceptions where it can be demonstrated that: the level of affordable housing sought would make the development unviable, off-site provision would have benefits, or it is not possible to build affordable homes on-site or off-site and therefore a financial contribution will be required.

The Council's planning committee in November 2018 agreed to apply a lower threshold of 10 dwellings or more to be consistent with the NPPF that had been revised during the preparation of the Local Plan.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils need to provide market and affordable homes that meet the varied needs of their communities. The consultation outlined that the Local Plan must continue to ensure that new developments include appropriate and viable levels of affordable housing with a balance of tenure types.

The responses showed support for prioritising the delivery of affordable housing and including a challenging target for affordable housing, due to the current chronic shortfall of affordable housing in Greater Cambridge. However, viability was also highlighted as an important consideration, and in particular that many of the existing strategic sites and new settlements are not delivering policy compliant levels of affordable housing.

Respondents highlighted a particular need for social rent housing / council housing, and affordable housing for local workers that support the Greater Cambridge economy. Overall, the comments received supported the creation of balanced and integrated communities by providing a mix of housing types, sizes and tenures that reflect the findings of the Councils evidence of housing needs of specific groups.

Evidence Base

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) estimates the need for social and affordable rent homes in each local authority area and collectively across the housing market area, by considering local house prices and rents, income levels and affordability, need from homeless, overcrowded, concealed or new households, and existing supply and relets. The study states that based on the identified affordable housing need for social/affordable rent homes in 2020-2040, the level of need equates to around 44%

of the overall need calculated using the standard methodology. The study clarifies that this is a crude comparison, but recommends that this suggests the local authorities should continue to seek as much affordable housing delivery as viability allows.

The study recommends that the Councils do not have a rigid policy for the split between social rent and affordable rent homes based on affordability alone, but states that the analysis is clear that both tenures are likely to be required in all areas. The study highlights that if local authorities wish to specify a split, they would need to consider a range of issues such as affordability, funding streams and viability.

The study considers the need for affordable home ownership and concludes that across the study area there is only a limited need for this type of housing. The study highlights that this should be considered alongside the acute need for rented affordable housing within the study area. The study therefore recommends that it is reasonable for the Councils to meet the NPPF 2021 requirement for 10% of all new homes to be affordable home ownership on eligible sites, and that there is limited evidence to suggest any district should set a requirement to exceed this proportion.

The Housing Needs of Specific Groups – Addendum for Greater Cambridge (GL Hearn, 2021) sets out the net need for both social/affordable rent homes and affordable homeownership for each of the different growth level scenarios. It states that based on the identified affordable housing need for social/affordable rent homes in 2020-2041, the level of need equates to around 53% of the overall need for the preferred housing requirement (described as medium 1:1 commuting). The identified need for affordable homeownership equates to another around 26% of the overall housing need.

The Greater Cambridge Local Plan will be subject to a viability assessment at each stage of plan making. The [Greater Cambridge Local Plan Strategic Spatial Options Viability Assessment](#) (Aspinall Verdi, November 2020) indicates that securing 40% affordable homes on major developments is deliverable across Greater Cambridge taking account of other development costs assumed at that stage in the plan making process. The assessment indicates that securing 50% affordable homes on major developments would also be viable. However, as development costs of the different policy requirements are added, the viability of developments is likely to change, and therefore the deliverability and viability of securing 40% affordable homes on all major developments across Greater Cambridge will be kept under review as the preparation of the Local Plan progresses.

The Greater Cambridge Local Plan Viability Study and Assessment Interim Report (Aspinall Verdi, 2021) has assessed the viability of the policy requirements included in the Greater Cambridge Local Plan: First Proposals. For the purposes of carrying out the assessment, it has assumed the following tenure mix for affordable housing: 25% First Homes, 15% shared ownership, 10% social rent, and 50% affordable rent.

The report indicates that securing 40% affordable homes on major developments is deliverable across Greater Cambridge, taking account of other development costs assumed at that stage in the plan making process. This will be kept under review as the plan making process moves forward.

The Greater Cambridge Authority Monitoring Report (AMR) includes data on affordable homes permitted. The [Greater Cambridge AMR 2019-2020](#) records that within South Cambridgeshire 32% of homes permitted in 2019-2020 on eligible developments were affordable, and explains that this is partly the result of the outline planning permission for the western part of Waterbeach New Town securing 30% affordable homes, rather than 40% affordable dwellings. The reason for the lower level of affordable homes on this development is the high infrastructure costs and therefore viability considerations, however, there is a review mechanism for this development that enables uplifts in affordable dwellings up to 40%.

The Greater Cambridge AMR 2019-2020 also records the percentages of affordable homes that have been secured on eligible permissions within South Cambridgeshire over the preceding eight years as follows:

- 2018-2019: 33%
- 2017-2018: 33%,
- 2016-2017: 41%, largely due to 50% affordable homes being secured on phase 2 of Northstowe
- 2015-2016: 38%
- 2014-2015: 23%, partly due to only 20% affordable homes being secured on phase 1 of Northstowe
- 2013-2014: 37%
- 2012-2013: 39%
- 2011-2012: 40%

Although not reported on in the Greater Cambridge AMR, the Councils have data on the percentage of affordable homes permitted on eligible developments within Cambridge in 2019-2020. It shows that for developments of 15 dwellings or more that would be required to provide affordable dwellings, 52% of the dwellings permitted were affordable dwellings. For the developments of 10-14 dwellings that would be required to provide affordable dwellings, one scheme comprised entirely of affordable dwellings, and the other scheme did not secure any affordable dwellings as it was accepted that it was not viable to.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

On sites of 10 or more dwellings 40% of new homes will be required to be affordable, except where: there can be a proportionate reduction as a result of vacant buildings being re-used or re-developed (as set out in national planning policy), the development is solely for Build to Rent (see H/BR for the requirements relating to these developments), the development is for some types of specialist accommodation that fall within Use Class C2, or the development is solely for residential caravans (see H/RC and H/GT for the requirements relating to these developments).

Affordable homes should be provided on-site except for in the circumstances set out in paragraph 63 of the NPPF 2021.

Mixed tenure developments that include Build to Rent homes should make up any shortfall in affordable homes within the Build to Rent element on the remainder of the development, so that overall the development delivers 40% affordable homes.

The affordable housing tenures provided should include the requirements as set out in national planning policy and guidance – the first at least 25% of the affordable homes on the development to be First Homes, with at least 10% of all new homes on the development to be provided as affordable home ownership products.

The plan will set out the proportion of the different affordable housing tenures for the remaining up to 75% of the affordable homes (after the at least 25% First Homes have been accounted for). This will take into account the issues of affordability experienced in Greater Cambridge and also viability, but should include an element of social rent homes in recognition that the Councils have been identified by the Government as areas of high affordability pressure.

Affordable rents should be set having regard to the [Greater Cambridge Housing Strategy Annexe 11: Setting of Affordable Rents](#) (Cambridge City Council and South Cambridgeshire District Council, June 2021) or a successor document.

Affordable housing for rent homes should be designed to accommodate different family compositions, with the bedspaces per dwelling guided by the recommendations set out in the [Greater Cambridge Housing Strategy Annexe 5: Summary of Requirements for Development of New Homes](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) or a successor document.

Affordable homes must be designed to be indiscernible from market homes, and affordable homes should be distributed throughout the site in small groups or clusters, in accordance with the guidance provided in the [Greater Cambridge Housing Strategy Annexe 10: Clustering and Distribution of Affordable Housing](#) (Cambridge City Council and South Cambridgeshire District Council, June 2021) or a successor document.

Local Lettings Plans will be required, where appropriate to help achieve mixed and balanced communities or to prioritise housing such as for local workers or for specific groups of people.

Applicants will be encouraged to work collaboratively with a Registered Provider, the relevant Councils housing team, and the Greater Cambridge Shared Planning service, to discuss the affordable housing provision and affordable tenures for a new development ahead of the submission of a planning application.

Viability will be considered as set out in the approach included in paragraph 58 of the NPPF 2021. The Greater Cambridge Local Plan will be subject to a viability assessment at each stage of plan making, including a whole plan viability assessment that will accompany the draft plan and be updated at subsequent stages of plan making. Current evidence indicates that securing 40% affordable homes is deliverable across Greater Cambridge taking account of other development costs assumed so far. The deliverability and viability of securing 40% affordable homes on all major developments across Greater Cambridge will be kept under review as the preparation of the Local Plan progresses.

Reasons for the proposed policy direction

National planning policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, and reflect the results of this assessment in their planning policies. The Councils have evidence that there is high level of need for affordable housing in Greater Cambridge, and it is important we seek a significant contribution from developments to respond to this need. The proposed approach takes account of national planning policy and guidance. Evidence demonstrates it is viable to seek 40% affordable homes on sites of 10 or more dwellings, and that a higher percentage will impact on the viability and delivery of sites.

Seeking high levels of affordable housing both by securing 40% affordable homes on sites of 10 or more dwellings, and by enabling the provision of affordable housing on rural exception sites (see H/ES), will make a significant contribution towards responding to our identified affordable housing needs. Our proposed policy direction seeks to provide affordable housing to meet needs whilst also creating balanced and integrated communities that include a mix of housing types, sizes and tenures, and that can viably be delivered.

It is important that affordable housing for rent homes are designed to accommodate different family compositions and therefore allow the Councils to house as many people as possible from their housing registers. Therefore, the number of bedspaces as well as the number of bedrooms needs to be considered when designing these homes.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. Not including an affordable housing policy. Not considered a reasonable alternative as without a policy there is a risk that the level or tenure of affordable housing provided on new developments would not meet the needs of the area.
2. Seeking a higher percentage of affordable homes on new developments. This is not the preferred approach, as a higher percentage would impact on viability and delivery of sites.
3. Seeking a lower percentage of affordable homes on new developments. This is not the preferred approach, as the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (2021) recommends that the local authorities should continue to seek as much affordable housing delivery as viability allows.
4. Continuing the adopted Cambridge Local Plan approach of seeking 25% affordable homes on sites of 10-14 dwellings and 40% affordable homes on sites of 15 dwellings or more. This is not the preferred approach, as the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (2021) recommends that the local authorities should seek as much affordable housing delivery as viability allows and the Greater Cambridge Local Plan Viability Study and Assessment Interim Report (2021) indicates that securing 40% affordable homes on major developments is deliverable across Greater Cambridge.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

The viability implications of the introduction of First Homes on the provision of other affordable tenures within new developments, while still seeking to deliver an overall requirement of 40% affordable homes on developments of 10 or more dwellings across Greater Cambridge, is still being considered by the Councils. Therefore, further work is required before the Councils are able to specify the proportions of the different affordable tenures that will be sought on the up to 75% of affordable homes, once the at least 25% of affordable homes to be First Homes has been accounted for.

5. H/ES Exception Sites for Affordable Housing

Issue the Plan is Seeking to Respond to

There is a particular need for affordable housing in rural communities, where limited development in these areas mean few homes come forward through market developments. Exception sites enable the delivery of more affordable housing in communities, and the affordable housing can be specifically tailored to the needs of local communities, particularly in rural communities.

Policy Context

National Context

The [National Planning Policy Framework](#) (NPPF 2021) supports the delivery of rural exception sites to bring forward affordable housing to address identified local needs. Market housing can be included in rural exception schemes where this will facilitate the delivery of the affordable housing. Schemes are typically on the edge of a rural community on a site that would not normally be granted planning permission for residential use.

The government has also introduced First Homes exception sites to deliver affordable housing for first time buyers. A [Written Ministerial Statement](#) was published on 24 May 2021. First Homes exception sites have replaced entry-level exception sites and changes were made to national planning guidance which came into effect on 28 June 2021 to facilitate this.

First Homes exception sites can address housing needs across the local authority area rather than be focused on the needs of a specific community, although the local authority does have discretion to introduce local eligibility criteria where evidence based. They should still be proportionate to the resident community in the adjoining settlement in terms of scale.

Like rural exception sites, First Homes exception sites will be on land not already allocated for housing and can include a small amount of market housing to facilitate schemes coming forward. However, unlike rural exception sites they cannot be located within the Green Belt.

Further details of First Homes are discussed in H/AH above.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) supports the development of rural exception sites and entry-level exception sites

(which have been replaced by First Homes exception sites). Rural exception sites are seen as an important tool to maintain the social fabric of rural communities. By enabling multi-generational families to stay close together they are also supporting the sustainability of village facilities such as local shops, schools and community facilities. Entry-level exception sites are expected to deliver economic development benefits by enabling people to move to the area to take up employment opportunities and minimise commuting journeys. First Homes exception sites should be able to deliver similar benefits. Government guidance supports the use of local eligibility criteria that enables key workers to access First Homes.

The Greater Cambridge Partnership through the City Deal has a target to deliver 1,000 additional affordable homes on rural exception sites by 2031. The partnership is on track to achieve this target.

Adopted Local Plans

The South Cambridgeshire Local Plan 2018 has a rural exception site policy (Policy H/11: Rural Exception Site Affordable Housing). Entry-level exception sites were introduced through national planning policy after the current Cambridge and South Cambridgeshire Local Plans were adopted and this is, clearly, also the case for First Homes exceptions sites.

A number of Neighbourhood Plans are in development in South Cambridgeshire. Several of these have policies supporting rural exception sites. Government guidance also encourages Neighbourhood Plans to consider supporting First Homes exception sites including locally specific criteria where appropriate.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils need to provide market and affordable homes that meet the varied needs of their communities. The consultation outlined that the Local Plan must continue to ensure that new developments include appropriate and viable levels of affordable housing with a balance of tenure types.

The First Conversation generated little response on exception sites but there was support for the idea of affordable housing prioritised for people with a local connection. This is a central tenet of rural exception site policy.

Evidence Base

As of April 2021 there were 1,603 applicants on the Housing Register for South Cambridgeshire and 1,919 applicants for Cambridge (Source: Home-Link Choice Based Lettings Scheme Register). There is a need for affordable housing from within the local community in almost every village in South Cambridgeshire. The [Housing](#)

[Statistical Information Leaflet](#) (South Cambridgeshire District Council, December 2019) shows that there are no Housing Register applicants in only five out of the 102 villages in the district and the Housing Register only captures part of the overall need.

Rural exception site proposals in South Cambridgeshire must be supported by a recent Housing Needs Survey for the village or parish concerned. These surveys can provide a more complete picture of need as they include households that are not on the Register either because they are not aware of the system or they are aware but do not join the Register because they do not believe they have a chance of securing an affordable home. There were 23 Housing Needs Surveys undertaken in South Cambridgeshire villages between April 2016 and March 2021 by [Cambridgeshire Acre](#). All showed evidence of local housing need and a number of consistent themes emerged from the surveys:

- There is a clear majority of community support for rural exception sites in almost all villages. A clear majority of opposition was not found in any village.
- Local communities are keen to see rural exception schemes support local facilities as well as providing homes for local people.
- Local market house prices are unaffordable for many rural residents even when in full-time work.
- The need for affordable rented properties out-numbers the need for low cost affordable home ownership.
- The need is for predominantly smaller homes although many households would like an additional bedroom above their entitlement to provide space for growing families or eldercare support.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

This policy will support exception sites in appropriate locations, typically adjoining existing settlements, and that are proportionate in scale to those settlements where there is an identified need. A small amount of market housing will be allowed on exception sites where it can be justified on viability or deliverability grounds. The use of such market housing in the form of custom and self-build housing will be supported. Community-led housing will also be supported on exception sites where it meets an identified need for affordable housing.

Rural exception sites will be allowed in the Green Belt only when it can be demonstrated that non Green Belt alternative sites are not available. First Homes exception sites will not be allowed in the Green Belt.

The Local Plan will encourage Neighbourhood Plans to consider the scope for further encouraging the development of schemes including through the use of community led housing initiatives such as community land trusts, co-housing and co-operatives.

First Homes are a specific kind of discounted market sale housing and fall within the definition of affordable housing for planning purposes. The policy will be tailored to ensure First Homes exception sites are complementary to rather than compete with rural exception sites. This could be through, for example, the use of locally specific criteria to determine eligibility in rural parishes.

Reasons for the proposed policy direction

It is proposed to continue with the current approach to supporting rural exception sites. South Cambridgeshire has a successful track record. Schemes will be considered across all scales of village as long as they are in proportion and keeping with the village character. Housing Needs Surveys have consistently showed need across villages of all scales. A local connection policy will continue to be applied which prioritises people with a local connection, through residence, family or employment, to the parish concerned because this ensures local housing need is targeted effectively and is supported by local communities.

First Homes exception sites are a new initiative. Their predecessor, entry-level exception sites, were unsuccessful and there were no schemes developed in Cambridge or South Cambridgeshire. Local evidence will be used to support a broader range of affordable housing tenures in First Homes exceptions sites where appropriate. Local eligibility criteria will be used in rural communities to ensure schemes are addressing local needs first. Schemes with larger numbers of First Homes addressing district wide needs would be better located in larger settlements.

It will be important to monitor the delivery of First Homes exception sites and their impact on the delivery of rural exception sites. Ideally, rural exception sites and First Homes exception sites should work in tandem offering a broader range of options to address local housing needs and support communities.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. No Policy. Not considered a reasonable alternative as this would restrict our ability to deliver additional affordable housing where it is most needed.
2. Apply a more restrictive approach to rural exception sites. Not considered a reasonable alternative because previous policies have been successful in bringing forward sites.

3. Apply a more laissez-faire approach to the development of exception sites. This was not identified as the preferred approach as this could lead to rural exception sites being squeezed out by First Homes exception sites, inappropriate sites coming forward and housing mixes being driven more by commercial gain than local need.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

As the Local Plan is prepared more up to date evidence on the need for affordable housing, particularly in rural communities, will be included where available.

Government progress on implementing First Homes exceptions sites policy will be monitored and changes to the Greater Cambridge Exception Sites for Affordable Housing preferred approach will be amended if required.

6. H/HM Housing Mix

Issue the Plan is Seeking to Respond to

As well as delivering the right number of homes, the plan needs to guide the size and type of homes delivered, so that they reflect the needs of different groups in the community.

Policy Context

National Context

Paragraph 62 of the [National Planning Policy Framework](#) (NPPF 2021) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The NPPF 2021 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023 and Annexes 1-8: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) sets out that the greatest need for social housing for rent across Greater Cambridge has been for 1 and 2 bedroom homes, and that the affordable housing mix on new developments should therefore broadly reflect this need whilst also providing some larger properties where appropriate. The strategy therefore provides a housing mix for affordable dwellings for both Cambridge and South Cambridgeshire based on the Home-Link register in 2017, but notes that this mix may be subject to change. The strategy also sets out that for smaller village schemes the affordable housing mix should be based on localised housing needs and that for rural exception sites the housing mix should be based on a village housing needs assessment.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) includes Policy 45: Affordable housing and dwelling mix that requires new residential developments to include a balanced mix of dwelling sizes, types and tenures. The adopted Local Plan does not provide a specific housing mix, as it states that further guidance on housing mix will be provided in a Supplementary Planning Document, informed by the Strategic Housing Market Assessment.

The adopted South Cambridgeshire Local Plan (September 2018) includes Policy H/9: Housing Mix that requires new developments to provide a wide choice, type and mix of housing to meet the needs of different groups in the community. The policy specifies that for market dwellings on developments of 10 or more dwellings at least 30% should be 1 or 2 bedrooms, at least 30% should be 3 bedrooms, and at least 30% should be 4 or more bedrooms, and that there is a 10% flexibility allowance for local circumstances. The policy states that the mix of market dwellings on smaller developments should take account of local circumstances and that the housing mix of affordable homes will be determined by local housing needs evidence.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils need to provide market and affordable homes that meet the varied needs of their communities.

Overall, the comments received supported the creation of balanced and integrated communities by providing a mix of housing types, sizes and tenures that reflect the findings of the Councils evidence of housing needs of specific groups. However, respondents also commented that the housing mix policy should be sufficiently flexible to address viability challenges, to address changing housing needs over the plan period, to appropriately cater for the needs of the community it will serve, and to appropriately respond to the site and its surroundings.

There were also differing views that highlighted both a wish for more smaller homes and microhomes – particularly for first time buyers and the homeless – to help overcome the affordability crisis, and for more family sized homes / bigger homes that provide flexibility. Specific comments were received highlighting a need for more bungalows for older people.

Evidence Base

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) makes recommendations on the housing mix – the proportion of dwellings by number of bedrooms – for new developments. The study uses population projections that GL Hearn have developed, that are linked to the standard methodology calculations for identifying housing needs, to forecast changes in household types between 2020 and 2040. The study forecasts the following changes in Cambridge:

- older person households (aged 65 and over) – one person households projected to increase by 39.1% and couple households projected to increase by 55.1%
- households with no dependent children (aged under 65) – one person households projected to increase by 15.8% and couple households projected to decrease by 2.9%

- couple households living with one or more other adults and no dependent children – projected to increase by 52.0%
- households with dependent children – all households with dependent children projected to increase by 16.3%
- ‘other households’, such as Homes in Multiple Occupation (HMOs) – projected to increase by 38.3%

The study forecasts the following changes South Cambridgeshire:

- older person households (aged 65 and over) – one person households projected to increase by 39.2% and couple households projected to increase by 65.6%
- households with no dependent children (aged under 65) – one person households projected to increase by 29.6% and couple households projected to decrease by 4.7%
- couple households living with one or more other adults and no dependent children – projected to increase by 35.2%
- households with dependent children – all households with dependent children projected to increase by 26.6%
- ‘other households’, such as Homes in Multiple Occupation (HMOs) – projected to increase by 55.0%

The study also includes forecasts for the study area as a whole, and that shows similar trends in projected increases and decreases in household types. The study highlights that there will be a notable increase (16.8%) in children projected to be living in the study area between 2020 and 2040, and that this is explained in part by families of child bearing age moving into newly built homes in the study area. The study also records that households with non-dependent children increased at a greater rate than changes to all other households in the study area between 2001 and 2011, which suggests that young people are facing difficulties in accessing housing in the study area and are therefore having to continue to live with their parents.

The study considers the projected changes in household types alongside other factors, such as the profile of the existing dwelling stock in the study area, the existing occupancy patterns of different household types, and the needs of those on the housing registers, to develop recommendations for the housing mix for the study area and each district by tenure. The study recognises that occupancy patterns might change in the future if either affordability was to worsen meaning that households would be forced to consider smaller houses than they would ideally like or alternative housing types were to become available (e.g. more specialist housing for older people) that would release other existing properties into the housing market.

The study recommends that local issues and circumstances should also be considered when identifying the appropriate housing mix for each district, but that there would need to be justification for a housing mix that differs significantly from its

recommendations. The study highlights that the recommended housing mix for each district will generally reinforce the existing stock profile, and therefore some variations could be needed to take account of changes to the projected population structure and household types for that district.

The study recommends the following housing mix for Cambridge:

Tenure	1-bedroom	2-bedrooms	3-bedrooms	4+- bedrooms
Market housing	0-10%	15-25%	40-50%	25-35%
Affordable housing – ownership	15-25%	35-45%	25-35%	5-15%
Affordable housing – rented	35-45%	30-40%	15-25%	0-10%

The study recommends the following housing mix for South Cambridgeshire:

Tenure	1-bedroom	2-bedrooms	3-bedrooms	4+- bedrooms
Market housing	0-10%	20-30%	35-45%	25-35%
Affordable housing – ownership	15-25%	35-45%	25-35%	5-15%
Affordable housing – rented	25-35%	35-45%	20-30%	0-10%

The study states that overall the analysis does not suggest a substantially different housing mix for each district when compared to that for the study area or between districts. Therefore the study recommends that the Councils should broadly seek the same housing mix in all locations, but should be flexible to a different mix where specific local characteristics are justified by factors such as local characteristics, the mix provided on other recent housing developments, and / or data from the housing register. The study recommends that the Councils should monitor what is being built to ensure that a reasonable mix is provided in the district and in individual settlements.

The study also considered whether there was evidence for different forms of homes, such as bungalows. The study was unable to quantify the need or demand for bungalows as there is limited data available that provides a breakdown between the different built forms; however, the study suggests that the Councils should consider the potential role of bungalows as part of the future mix of housing of new developments.

The Housing Needs of Specific Groups – Addendum for Greater Cambridge (GL Hearn, 2021) sets out the modelled housing mix for each of the different growth level scenarios having followed the same methodology as used in the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021). It reports that there is very little difference in the outputs for the different growth level scenarios, and therefore that the conclusions on housing mix in the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) remain sound.

The Greater Cambridge Authority Monitoring Report (AMR) includes data on the housing mix of new homes completed in South Cambridgeshire since 1 April 2011. The [Greater Cambridge AMR 2019-2020](#) shows that within South Cambridgeshire over the last nine years, in six out of nine of those years the majority of new homes completed have been 1 or 2 bedroom homes.

Bedrooms	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	Total: 2011-2020
1 or 2 bedrooms	45%	32%	41%	43%	29%	35%	40%	42%	40%	39%
3 bedrooms	23%	34%	27%	34%	33%	34%	33%	28%	31%	31%
4 or more bedrooms	31%	29%	28%	22%	37%	30%	27%	29%	28%	29%
unknown	1%	4%	4%	1%	1%	1%	1%	2%	1%	2%

The Greater Cambridge AMR 2019-2020 also shows that within South Cambridgeshire in the years since the adoption of Policy H/9 in September 2018 that at least 30% of market dwellings completed have been 3 bedrooms and at least 30% have been 4 or more bedrooms. However, in the last year and prior to the adoption of the policy, there have been less than 30% market dwellings completed with 1 or 2 bedrooms.

Bedrooms	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020
1 or 2 bedrooms	33%	40%	35%	26%	24%	21%	28%	30%	24%
3 bedrooms	31%	24%	21%	33%	33%	35%	31%	33%	36%
4 or more bedrooms	36%	35%	44%	40%	41%	42%	41%	37%	40%
unknown	0%	0%	0%	1%	1%	2%	0%	0%	0%

Although not published in the Greater Cambridge AMR, the Councils have data on the housing mix of new homes completed in Cambridge since 1 April 2011. It shows that within Cambridge over the last nine years, in all nine of those years the significant majority of new homes completed have been 1 or 2 bedroom homes.

Bedrooms	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	Total: 2011-2020
1 or 2 bedrooms	80%	66%	70%	61%	60%	74%	70%	68%	81%	69%
3 bedrooms	16%	23%	17%	23%	24%	15%	16%	12%	11%	17%
4 or more bedrooms	4%	11%	13%	16%	16%	11%	14%	12%	7%	13%
unknown	0%	0%	0%	0%	0%	0%	0%	8%	0%	1%

The same data (although not published in the Greater Cambridge AMR) can also be analysed to enable a comparison of housing completions by the size and type of dwelling – houses or flats – and tenure.

Gross Housing Completions (Gains Only) for 2011-2020 in Cambridge

Tenure, type and bedrooms	Affordable Flats	Affordable Houses	Market Flats	Market Houses	Total
1 bedroom	667	4	1,275	71	2,017
2 bedrooms	1,332	330	1,644	262	3,568
3 bedrooms	45	438	201	724	1,408
4+ bedrooms	2	103	5	906	1,016
Unknown bedrooms	0	0	75	0	75
Total	2,046	875	3,200	1,963	8,084

Gross Housing Completions (Gains Only) for 2011-2020 in South Cambridgeshire

Tenure, type and bedrooms	Affordable Flats	Affordable Houses	Market Flats	Market Houses	Total
1 bedroom	328	103	139	47	617
2 bedrooms	348	649	466	783	2,246
3 bedrooms	2	497	8	1,791	2,298
4+ bedrooms	0	89	1	2,060	2,150
Unknown bedrooms	0	0	0	38	38
Total	678	1,338	614	4,719	7,349

Gross Housing Completions (Gains Only) for 2011-2020 in Greater Cambridge

Tenure, type and bedrooms	Affordable Flats	Affordable Houses	Market Flats	Market Houses	Total
1 bedroom	995	107	1,414	118	2,634
2 bedrooms	1,680	979	2,110	1,045	5,814
3 bedrooms	47	935	209	2,515	3,706
4+ bedrooms	2	192	6	2,966	3,166
Unknown bedrooms	0	0	75	38	113
Total	2,724	2,213	3,814	6,682	15,433

This shows that within Greater Cambridge as a whole, one bedroom homes tend to be provided as flats, two bedroom homes also tend to be provided as flats (with double the number of two bedroom flats completed in 2011-2020 compared to two bedroom houses in the same period), and three or more bedroom homes tend to be provided as houses. However, looking at the local authority areas individually shows that new homes in Cambridge are predominantly flats, whereas in South Cambridgeshire new homes are predominantly houses, which is unsurprising given the urban and rural character of the areas.

This data also shows that within South Cambridgeshire affordable homes completed were 27% of all homes completed, and within this just over half (52%) of the flats completed were affordable while only 22% of the houses completed were affordable. This therefore shows that the provision of flats in South Cambridgeshire tends to be skewed towards affordable homes. Whereas the data shows that within Cambridge the proportions of affordable flats and affordable houses completed have been more consistent with the overall proportion of affordable homes completed. Affordable homes completed were 36% of all homes completed, 39% of flats completed were affordable, and 31% of houses completed were affordable.

Note: these figures are different to those quoted in H/AH because they relate to the amount of affordable homes completed as a percentage of all homes completed, rather than the percentage of affordable homes permitted on all eligible permissions as set out in H/AH.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

New housing developments of 10 or more dwellings will be required to provide an appropriate mix of housing sizes (number of bedrooms), with the proportions of dwellings of each size to be guided by the housing mix for each tenure and for Cambridge and South Cambridgeshire as set out in the recommendations from the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (2021) and the Housing Needs of Specific Groups – Addendum for Greater Cambridge (2021) or any future update to the Greater Cambridge Housing Strategy or housing mix evidence published by the Councils. As the proportion of dwellings of each size is provided as a range, this allows flexibility for local circumstances.

The housing mix (size of bedrooms) recommendations from the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (2021) and Housing Needs of Specific Groups – Addendum for Greater Cambridge (2021) are as follows:

For Cambridge:

Tenure	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Market housing	0-10%	15-25%	40-50%	25-35%
Affordable housing – ownership	15-25%	35-45%	25-35%	5-15%
Affordable housing – rented	35-45%	30-40%	15-25%	0-10%

For South Cambridgeshire:

Tenure	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Market housing	0-10%	20-30%	35-45%	25-35%
Affordable housing – ownership	15-25%	35-45%	25-35%	5-15%
Affordable housing – rented	25-35%	35-45%	20-30%	0-10%

Exceptions will be allowed where an alternative housing mix is justified by site specific circumstances, such as local character, the built form of the new development, affordable housing demand on the Councils’ housing registers, and the existing housing mix in the surrounding area.

In some circumstances a condition(s) may be added to the planning permission to remove the permitted development rights for all or some of the dwellings if increasing the approved number of bedrooms for all or some of the dwellings through extensions would harm the housing mix that the development was responding to.

Policy will also encourage the delivery of a mix of types of homes – houses, flats and bungalows – proportionally across all market and affordable tenures, taking account of local circumstances including character and built form, and up to date evidence of affordable housing need as demonstrated by the Councils’ housing registers.

Applicants will be encouraged to work collaboratively with a Registered Provider, the relevant Councils housing team, and the Greater Cambridge Shared Planning service, to discuss the affordable housing mix for a new development ahead of the submission of a planning application.

Reasons for the proposed policy direction

National planning policy requires local authorities to assess the size and type of housing needed for different groups in the community, and reflect the results of this assessment in their planning policies. The Councils have evidence that there is a need for a mix of size of homes and types of homes in Greater Cambridge. The proposed approach sets out a requirement for an appropriate housing mix to be provided that is guided by the recommendations in the Councils evidence.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. Not including a policy setting out a housing mix for new developments, and therefore relying on the housing market to determine the housing mix. Not considered a reasonable alternative as without a policy there is a risk that the housing mix provided on new developments would not meet the needs of the area.
2. Applying the housing mix policy to all developments. Not considered a reasonable alternative as it is not practical to apply the housing mixes suggested to sites of less than 10 dwellings, and for smaller sites it is important to make best use of the land and to take account of local circumstances.
3. Not including a policy setting out a housing mix for affordable dwellings, and therefore relying on local circumstances to determine the housing mix. Not considered a reasonable alternative as without guidance in the Local Plan there is a risk that the affordable housing mix provided on new developments would not meet the needs of the area.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

7. H/HD Housing Density

Issue the Plan is Seeking to Respond to

Land is a scarce resource and needs to be used efficiently whilst responding to local character. Building at higher densities in appropriate locations can also help give more people access to high quality public transport nodes and services.

Policy Context

National Context

The [National Planning Policy Framework](#) (NPPF 2021) requires planning policies and decisions to support development that makes efficient use of land. It encourages the use of minimum density standards for city and town centres and other locations that are well served by public transport.

Regional / Local Context

There is no specific regional or local policy for housing density, other than that set out in the adopted Local Plans.

Adopted Local Plans

The adopted South Cambridgeshire Local Plan housing density policy sets out average net densities for developments within Group Villages, Minor Rural Centres, Rural Centres, new settlements and urban extensions, but also allows for the density to vary from these requirements where justified by the character of the locality, the scale of the development or other local circumstances. The adopted Cambridge Local Plan does not have a specific policy on housing densities; it does however refer to housing densities for a range of specific sites within specific policies and allocations.

There are also a number of Area Action Plans (AAPs) and Supplementary Planning Documents (SPDs) which have housing density policies for specific locations. For example, these include North West Cambridge AAP, Cambridge Southern Fringe AAP, Cambridge East: North of Cherry Hinton SPD and Bourn Airfield New Village SPD. It is not intended that the Greater Cambridge Local Plan replaces these unless there are specific reasons for doing so.

Consultation and Engagement

The 'First Conversation' consultation set out densification of existing urban areas as one of the approaches for new homes and jobs. It set out that this would be done by encouraging intensive use of brownfield land, building taller buildings, building on

existing residential back gardens or in-between existing buildings, or redeveloping underused sites at higher densities.

The majority of respondents who commented on housing densities in the First Conversation supported the principle of building to higher densities in Cambridge to achieve more sustainable development and meet demand for city living.

Evidence Base

Housing developments completed in Greater Cambridge over the last ten years have delivered a range of housing densities. These have varied from year to year and reflect many factors including site constraints and context, scheme type and the settlement type. Over the period 2011/12 to 2019/20 housing densities on schemes of more than nine dwellings ranged from 29.1 dwellings per hectare (dph) to 45.1dph in South Cambridgeshire. In Cambridge the range was from 55.6dph to 194.4dph. Over the same period, 25% of these sites in South Cambridgeshire achieved an average density of less than 30dph, 57% achieved a density of between 30-50dph and 18% achieved a density of above 50dph. In Cambridge only 0.5% of schemes achieved a density of less than 30dph, 20% achieved a density of 30-50dph and 79% achieved a density in excess of 50dph.

These ranges are illustrated by the different experiences of Trumpington Meadows and Eddington. Up to March 2020, Trumpington Meadows had been developed at an average of density of 48.5dph compared with 170.6dph in Eddington.

Within South Cambridgeshire the densities are highest in urban extensions adjoining Cambridge (48.7dph) followed by new settlements (38.9dph). Densities are higher in Rural Centres (33.4dph) and Minor Rural Centres (35.9dph) than in Group Villages (27.6dph) and Infill Villages (22.3dph).

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

The policy will seek to deliver site specific appropriate net densities across Greater Cambridge, taking advantage of opportunities to deliver higher densities on sites with good accessibility subject to local character considerations.

We propose to apply a design-led approach to determine the optimum development capacity of sites in order to make the best use of land. A design-led approach to optimising site capacity requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, existing and planned supporting infrastructure, local character, and other

local circumstances. We want to encourage higher densities in locations which are, or will be, highly accessible by walking, cycling and public transport.

Reasons for the proposed policy direction

The evidence about densities achieved on sites across Greater Cambridge illustrates that there is not a consistent density approach across a certain type of settlement or location. Evidence from elsewhere, including supporting the new London Plan, shows that applying blanket density guidelines, even when linked to measures of public transport accessibility levels, leads to unintended consequences where sites can be under-utilised, or where unrealistically high expectations of site capacity lead to difficulties in the design and determination of applications, and the risk of over-development in sensitive locations. It is notable that the new London Plan has moved away from specifying densities linked to accessibility, to requiring developers to evidence an appropriate design-led approach to density through analysis of context, location and site specific factors.

Greater Cambridge comprises a wide variety of different settlement types, urban and rural typologies. Within the City of Cambridge, lower density areas and higher density areas can be found, and due to the historic character of much of the city, higher densities will not always be appropriate in locations very well served by public transport. There are also opportunities to intensify areas that are currently low-density, but which are, or will be, highly accessible by public transport, through higher density development where this will not negatively impact the character and quality of the environment. Planned new public transport infrastructure will change the accessibility of many parts of the city, and applying blanket density levels could discourage making the best use of land in locations where higher density development could minimise car use and reduce development pressure elsewhere in Greater Cambridge. Our aim of creating vibrant, compact and walkable neighbourhoods which make best use of land means that typologies which represent a range of densities should be considered across larger sites and around the edge of Cambridge where higher density development has been shown to successfully create new communities in locations, and where careful integration with landscape has ensured that the visual impact of development is softened.

Within the rural area, blanket densities can discourage a design-led approach to sites. While the current density policy within the South Cambridgeshire Local Plan advises that density levels are for guidance only, in reality it can be seen that rarely have densities been delivered that lie outside of a relatively narrow band. Findings from recent work with rural communities through the development of the Village Design Guide Supplementary Planning Documents showed that the perception of density in rural developments by local residents, did not correlate to the numerical density of the sites, and that well-designed and well-liked places could have higher densities than poorly designed developments. Local conditions, including transport accessibility, vary greatly between rural communities and a blanket density level

would potentially suppress the opportunity to create accessible developments that reduce car dependency in well-connected locations. In line with our strategic goal of minimising carbon emissions, encouraging appropriate densities on a site specific basis in rural communities can help to deliver sustainable growth which supports the rural economy.

Density is difficult to measure meaningfully across large and small sites, as net density (the density within the redline of the site boundary, excluding surrounding streets and open spaces) may bear little relationship to the wider gross density of an urban block or quarter. Density as measured in dwellings per hectare can also be misleading due to the varied mix of unit sizes that may be provided on sites of different kinds, or in different development models – for example, build to rent when compared to family housing in an urban extension. For this reason we propose that, a range of density metrics should be provided by developers in order to inform the development management process, including dwellings per hectare, habitable rooms per hectare, bedspaces per hectare, and clear guidance for how to measure net and gross density.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. Not including a density policy. Not considered a reasonable alternative because this would limit the scope to ensure land is used effectively.
2. Applying a blanket density across the whole plan area. Not considered a reasonable alternative as this does not reflect the range of settlements, and their differing characteristics, within Greater Cambridge. Including a higher density requirement for the whole of Greater Cambridge was discounted as this could encourage over-development.
3. Applying different target or guide density levels to different settlement categories in Greater Cambridge. Not considered a reasonable alternative as within settlements, accessibility varies depending on location, and local conditions present a range of opportunities and constraints on site capacity. Well-designed places would not be delivered through application of density levels that do not take account of site characteristics.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

8. H/GL Garden land and subdivision of existing plots

Issue the Plan is Seeking to Respond to

Using land efficiently within settlements is important, as it can help reduce the need for development outside existing areas. In appropriate circumstances development of gardens could be used to help with this. However, the inappropriate development of dwellings in residential gardens and subdivision of existing plots can have a negative impact on local areas. Gardens provide an important environmental resource and can play a significant role in alleviating fluvial and surface water flooding. The subdivision of existing plots can result in over-development with increasing pressures on roads, services and utilities.

Policy Context

National Context

Paragraph 71 of the [National Planning Policy Framework](#) (NPPF 2021) states that “plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”. Paragraph 124 of the NPPF 2021 also argues that the drive to make the most efficient use of land should be tempered by the “desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change”.

The NPPF 2021 specifically excludes residential gardens from the definition of previously developed land.

Regional / Local Context

There is no specific regional or local policy for developing garden land or subdividing plots, other than that set out in the adopted Local Plans.

Adopted Local Plans

The South Cambridgeshire Local Plan 2018 seeks to control garden development through policy H/16: Development of Residential Gardens. This is a criteria based policy which is based on a concern about potential negative impacts on residential amenity, local character, heritage and from increased traffic.

Cambridge Local Plan 2018 Policy 52: Protecting garden land and the subdivision of existing dwelling plots takes a similar criteria based approach. The policy emphasises that proposals will also be assessed against other policies in the plan.

Consultation and Engagement

The 'First Conversation' consultation set out densification of existing urban areas as one of the approaches for new homes and jobs. It set out that this would be done by encouraging intensive use of brownfield land, building taller buildings, building on existing residential back gardens or in-between existing buildings, or redeveloping underused sites at higher densities.

Despite general support for the principle of building to higher densities there was no support in the First Conversation responses for the use of garden sites for residential development or the subdivision of family homes.

Evidence Base

Policy 52 of the Cambridge Local Plan 2018 is monitored through the Greater Cambridge Authority Monitoring Report. Over the period 2011-2020 there were 197 dwellings completed. In the most recently monitored year, 2019-2020, there were 17 dwellings completed and all were considered to be appropriate development when assessed against policy 52.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

The policy will continue the approach of the adopted Cambridge and South Cambridgeshire Local Plans by resisting inappropriate development of residential gardens and the subdivision of existing plots. This will be done by reference to a range of factors including potential harm to local character, adequacy of remaining amenity space, trees, heritage and biodiversity. The policy will also seek to stop development that would compromise the potential of other land to be brought forward for development.

Reasons for the proposed policy direction

Current policies are considered to have been successful in resisting inappropriate development of residential gardens and the subdivision of existing plots. Our consultation has demonstrated that there is support for this approach to continue.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy. This approach is not the preferred approach as it would not provide clear guidance on the approach that would be taken to development on garden land and subdivision of existing plots, and could lead to inconsistent outcomes.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

9. H/SS Residential Space Standards and accessible homes

Issue the Plan is Seeking to Respond to

To make sure homes provide a high standard of amenity for existing and future users, by ensuring they provide enough space, and that enough of them are accessible and adaptable so people are able to remain safe and independent in their homes.

Policy Context

National Context

Paragraph 130 of the [National Planning Policy Framework](#) (NPPF 2021) states that planning policies should ensure that developments create places with a high standard of amenity for existing and future users. The accompanying footnote (Footnote 49) states that planning policies for housing should make use of the optional technical standards for accessible and adaptable housing and also the nationally described space standard, where these would address a need and can be justified. The NPPF 2021 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

The [Housing: optional technical standards](#) section of the Planning Practice Guidance (PPG, published March 2015) sets out that where a local planning authority wishes to require an internal residential space standard that this can be done by reference to the nationally described residential space standard. The PPG sets out that local authorities should provide justification for requiring the standard taking account of need, viability and timing, with guidance provided on what should be considered for each.

The same section of the PPG also sets out that local authorities can require accessibility, adaptability and wheelchair standards in new dwellings provided that they have evidence that demonstrates a clear need for these types of housing and their resulting policies plan to meet this need. The PPG states that planning policies should only set out the requirements for enhanced accessibility or adaptability of dwellings through reference to the optional requirements within [Part M of Building Regulations](#) – M4(2) ‘accessible and adaptable dwellings’ and M4(3) ‘wheelchair user dwellings’, and that the proportion of new dwellings that should comply with each requirement should be clearly stated.

The PPG specifies that any planning policies requiring either Building Regulations M4(2) and / or M4(3) should take into account site specific factors and that for developments where step free access is not viable, neither of the requirements should be applied.

Building Regulations distinguish between wheelchair accessible homes (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable homes (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings, and that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

The Government [consulted](#) on options for raising accessibility standards for new homes in September - December 2020.

The [nationally described residential space standard](#) sets out internal space requirements relating to bedrooms, storage and internal areas for new dwellings, with the requirements determined by the number of storeys, bedrooms and bedspaces.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023 and Annexes 1-8: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) includes “achieving a high standard of design and quality of new homes and communities” as one of its priorities and to achieve this sets it out that all new homes should meet the nationally described residential space standard as a minimum, that the design of new homes should be future proofed so that as residents age homes can be easily adapted to meet their changing needs, and that the Councils will themselves (wherever possible) build new homes to the Building Regulations M4(2) accessible and adaptable standard and encourage other housebuilders to do so as well.

The [Cambridge Sustainable Housing Design Guide](#) sets out key design principles for the development of council owned land and new social housing delivered by/for the Greater Cambridge Housing Development Agency in Cambridge, including references to the adopted Cambridge Local Plan 2018 requirements for issues such residential space standards and accessibility standards.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) includes Policy 50: Residential space standards that requires new residential units to meet or exceed the nationally described residential space standard (or its successor) and all new residential units to have direct access to an area of private amenity space (e.g. private garden, balcony, roof garden, ground level patio) sufficient for basic daily activities and needs. The supporting text sets out that new homes created through residential conversions and homes created by changes of use from non-residential land uses should seek to meet or exceed the nationally described residential space standards

as far as it is practicable to do so. The supporting text also provides guidance on what this private space should be able to accommodate and sets out that the amount of space provided should be based on the number of bedspaces, but neither the policy or the supporting text specify minimum areas or other dimensions.

The adopted Cambridge Local Plan (October 2018) also includes Policy 51: Accessible homes that requires all housing developments to enable Building Regulations M4(2) to be met and 5% of affordable homes on developments providing or capable of providing 20 or more new self-contained affordable homes to meet Building Regulations M4(3).

The adopted South Cambridgeshire Local Plan (September 2018) includes Policy H/12: Residential Space Standards that requires new residential units to meet or exceed the nationally described residential space standard (or its successor). The adopted South Cambridgeshire Local Plan does not include any references to the provision of private gardens or amenity spaces for new residential units. However, the South Cambridgeshire District Design Guide Supplementary Planning Document (adopted March 2010) provides in Chapter 6 guidance on the provision of private gardens and amenity space. It sets out that every home should have the benefit of some private or communal outside amenity space (e.g. private garden, communal garden, roof terrace or balcony) and sets out the requirements for each of these spaces, including specific sizes for each type of space based on the number of bedrooms, the type of dwelling (house or apartment), and location (rural or urban setting).

The adopted South Cambridgeshire Local Plan (September 2018) includes as part of Policy H/9: Housing mix that 5% of homes in a development should be built to Building Regulations M4(2) standard and that the provision should be split evenly between market and affordable homes. The supporting text sets out that the provision of housing constructed to wheelchair housing design standards will only be expected as part of the affordable housing element of developments and then only in response to identified need.

Consultation and Engagement

The 'First Conversation' consultation set out that the new Local Plan would need to consider whether it remained appropriate to continue to require the national minimum residential internal space standards for new homes.

Overall respondents supported the Councils in continuing to include in the Local Plan minimum size standards to ensure provision of sufficient indoor space, set requirements for accessibility and adaptability of homes, and make sure that new homes have access to private gardens and outdoor space. Some comments referred to a wish for homes to meet the Lifetime Homes standard and be designed to include flexibility to enable adaptation during the lifetime of their occupants. Respondents

also commented that any requirements should not be applied inflexibly as some people are happy with smaller homes that are high quality. Developers highlighted that any required standards have implications for build costs, and that it is important that these requirements are considered in the viability assessment of the Local Plan.

Evidence Base

The Councils prepared evidence to support the inclusion of the planning policies in their adopted Local Plans that require new dwellings to meet or exceed the nationally described residential space standard. This evidence considered the need for the standard by analysing whether the nationally described standard was already being met on a sample of new developments. The analysis found that while the majority of new developments met or exceeded the standard, there were still significant percentages of new homes within these sample developments that did not meet one or more of the elements of the standard. The evidence also considered viability and timing, and concluded that a policy requiring the standard would not have an impact on the viability of proposed developments and that no transitional provisions were necessary.

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) reports that 26.6% of households in Cambridge and 27.4% of households in South Cambridgeshire, or 13.0% of the population of Cambridge and 13.9% of the population of South Cambridgeshire, had a long term health problem or disability based on the Census 2011. The study also reports that the majority of people in Cambridge and South Cambridgeshire with a long term health problem or disability are aged 65 years or over, and that people living in social rented properties are twice as likely to have a long term health problem or disability.

Based on its population projections, the study anticipates that there will be a 51.3% increase in over 65s with mobility problems in Cambridge by 2040 and a 62.1% increase in over 65s with mobility problems in South Cambridgeshire. GL Hearn state that the analysis of projected increases in population with mobility problems by 2040 would suggest that the Councils should require all new dwellings to be M4(2) 'accessible and adaptable dwellings', subject to constraints such as built form, topography, and flooding. The study states that in some cases the M4(2) requirements may challenge viability.

The study also analyses data on wheelchair users, and based on its population projections, concludes that the need for wheelchair user homes equates to 6.4% of the overall housing need 2020-2040 for Cambridge and 6.6% of the overall housing need 2020-2040 for South Cambridgeshire. The study also estimates the need for wheelchair user homes by tenure, and concludes that for Cambridge there is a need for 5% of market homes and 13% of affordable homes to be wheelchair user homes, and for South Cambridgeshire there is a need for 5% of market homes and 14% of affordable homes to be wheelchair user homes. However, the need varies across the

housing market area, with other districts having a higher need than within Greater Cambridge and therefore GL Hearn recommend that all Councils in the housing market area seek 10% of all new market homes and 25% of all new affordable homes to be M4(3) compliant.

The study states that it may not be possible for some developments to meet the M4(3) requirements due to both site constraints and viability. The study includes the differences in the costs associated with each of the M4(2) and M4(3) requirements when applied to a range of types and sizes of homes. The costs associated with meeting the M4(2) requirements are less than £1,000 per dwelling, with higher costs for flats (around £900) rather than houses (around £500). However, the costs associated with M4(3)(a) and M4(3)(b) are much higher, as the study records that to meet M4(3)(b) in a new house is over £22,000 per dwelling, and to meet M4(3)(a) is less but still high at around £10,000 per dwelling. The costs associated with M4(3) are lower for flats, at around £7,500-£8,000.

Based on its population projections for the different growth level scenarios, the Housing Needs for Specific Groups – Greater Cambridge Addendum (GL Hearn, 2021) reports that for all scenarios there will be an increase of over 60% in the over 65s with mobility problems by 2041. It also concludes that the need for wheelchair user homes equates to between 4.7% and 6.4% of the overall housing need 2020-2041 for Greater Cambridge, depending on the growth level scenario.

The adopted Cambridge Local Plan in Policy 51: Accessible homes requires all new homes to meet the Building Regulations M4(2) standard. In seeking to implement this policy a number of challenges have arisen, particularly on small sites due to heritage issues, overall site constraints and viability. Officers have therefore been taking a flexible approach to implementing the policy in specific circumstances to ensure that a range of housing schemes continue to be deliverable in Cambridge.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

Gross internal floor areas for all new homes will be required to meet or exceed the [nationally described residential space standard](#) or its successor. Exceptions only where new homes are being provided to meet a specific evidenced need (e.g. accommodation for homeless, disabled or specific young adults) and evidence is provided to demonstrate that meeting this nationally described standard would result in unsuitable homes for the identified occupants.

New homes created through residential conversions and homes created by changes of use from non-residential land uses should seek to meet or exceed the nationally described residential space standards as far as it is practicable to do so.

All new homes will be required to be Building Regulations M4(2) 'accessible and adaptable' dwellings. Exceptions only where it can be demonstrated that site specific circumstances, in addition to the other requirements for the development, make the proposed development impractical, unachievable or unviable.

5% of affordable homes on new developments that include 20 or more affordable homes will be required to be Building Regulations M4(3) 'wheelchair user' dwellings, to be provided as Building Regulations M4(3)(a) 'wheelchair adaptable' dwellings unless the Council has identified a need for Building Regulations M4(3)(b) 'wheelchair accessible' dwellings. Exceptions only where it can be demonstrated that there is no evidence of need.

All newly created homes (through conversion, change of use, or new build) will be required to have direct access to private amenity space. We propose to develop revised minimum space standards for private amenity space for different types of dwellings and locations.

Reasons for the proposed policy direction

National planning policy states that planning policies should ensure that developments create places with a high standard of amenity for existing and future users. It specifically allows local authorities to include planning policies that make use of the nationally described residential space standard and the optional technical standards for accessible and adaptable housing, where these would address a need and can be justified.

The Councils have evidence to justify the use of the nationally described residential space standard and the optional technical standards for accessible and adaptable housing. The Councils also consider that it is important that homes have access to an area of private amenity space (e.g. private garden, balcony, roof garden, ground level patio) sufficient for basic daily activities and needs.

Requiring all new homes to be Building Regulations M4(2) 'accessible and adaptable' dwellings allows for dwellings to be adapted over time, including to accommodate a wheelchair user(s), or to take account of other disability or mobility issues. New self or custom build dwellings can also be designed specifically to meet the requirements of the occupant(s) and therefore take account of any disability or mobility issues.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. Not implementing the nationally described space standards. This is not the preferred approach because our evidence shows that without specifically requiring

the standards some developments will be designed to provide new homes below these standards.

2. Not requiring new homes to meet Building Regulations M4(2) standard. This is not the preferred approach because the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (2021) provides recommendations on the percentage of new homes that should meet this standard based on evidence of need, and accessible and adaptable housing enables people to live more independently and it is better to build these types of homes from the outset rather than have to make adaptations at a later stage.

3. Not requiring new homes to meet Building Regulations M4(3) standard. This is not the preferred approach because there is evidence of need for wheelchair user homes. The additional costs associated with providing homes to meet either of the M4(3) standards are significant and therefore requiring a higher percentage would have implications for other policy requirements or the overall viability of a development.

4. Not provide guidance on the provision of private amenity space for all new homes. This is not the preferred approach because national planning policy states that planning policies should ensure that developments create places with a high standard of amenity for existing and future users. Outside amenity space is an important part of this and the need for it was emphasised during the coronavirus pandemic.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

The Councils may need to review their preferred approach to 'accessible and adaptable' dwellings, depending on the outcome of the Government's consultation on the accessibility of new dwellings and any changes to Building Regulations.

The Councils will also continue to develop evidence regarding the implementation of residential space standards.

The Councils are working on a project to better understand the needs of people who need to move to wheelchair accessible housing. The Councils will work alongside the SEND (Specialist Education Needs and/or Disabilities) Specialist Housing advisors and the Disability Social Care Service. The project includes looking at the size and locations of the homes needed, when they are likely to be needed, and the likely future demand in Greater Cambridge. The Councils will aim to have collected and analysed their data by March 2022 to inform the preparation of the new draft Local Plan.

10. H/SH Specialist Housing and Homes for Older People

Issue the Plan is Seeking to Respond to

National planning policy requires the size, type and tenure of homes needed for different groups in the community, including older people and people with disabilities, to be assessed and that the results of that assessment be reflected in planning policies.

Specialist housing (within both Use Classes C2 and C3) can be needed to support a variety of groups such as older people, people with disabilities, people with alcohol or drug dependency, those requiring refuge from harassment and violence, and others who may, for a variety of reasons, be excluded from the local community. Specialist housing is designed so that support can be provided to its occupants (and often to others in the wider community) while promoting independent living. Examples of specialist housing range from a small scheme of cluster flats with additional facilities for support staff, to much larger extra care schemes enabling older and disabled people to live in their own self-contained accommodation but with care and support on-site.

Policy Context

National Context

Paragraph 62 of the [National Planning Policy Framework](#) (NPPF 2021) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The NPPF 2021 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

The [Housing for older and disabled people](#) section of the Planning Practice Guidance (PPG, published June 2019) sets out that it is critical to provide housing for older people as people are living longer and the proportion of older people in the population is increasing, and therefore offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities, and help reduce costs to the social care and health systems. It also sets out that provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.

There are different forms of specialist housing:

- **age restricted general housing** – this is general housing specifically for people over a certain age that may include some shared amenities such as communal gardens, but does not include support or care services.
- **sheltered housing** – this usually consists of purpose built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room, and does not generally provide care services, but does provide some support such as 24 hour on site assistance via alarms and wardens.
- **extra care housing or housing with care** – this usually consists of purpose built flats or bungalows with medium to high levels of care available (if required) through an onsite care agency. These developments have 24 hour access to support services and staff, and meals are available. They often include extensive communal areas, such as space to socialise or a wellbeing centre.
- **residential care homes and nursing homes** – these have individual bedrooms and provide a high level of care meeting all activities of daily living.

Some of these forms of specialist housing will be considered to be use class C3 (dwellings) and some will be considered to be use class C2 (residential institutions / communal accommodation). National planning guidance sets out that it is for the local planning authority to determine which use class a particular development falls into, but suggests that when making the decision consideration could be given to the level of care provided and the scale of communal facilities provided.

National planning guidance also sets out that communal (use class C2) accommodation provided in the form of bedspaces for older people can be counted towards delivering the housing requirement, based on the amount of accommodation those new bedspaces release to the wider housing market (National Planning Practice Guidance, published July 2019, Paragraph: 034 Reference ID: 68-035-20190722). The [Housing Delivery Test rulebook](#) sets out the ratios to be used to convert bedspaces to dwellings for older peoples accommodation.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) sets out that the Councils will continue to develop partnership working with appropriate organisations to ensure that sufficient support is available for those at greatest risk, including young people leaving care, ex-offenders, those suffering from domestic abuse and asylum seekers, and that where purpose built accommodation is required, the Councils will work with the commissioners and developers to secure appropriate accommodation on new developments.

The housing strategy also sets out that both Councils are keen to promote a range of housing options to accommodate people and families throughout their lifetime across all tenures, to enable them to live safely and independently for as long as possible. It

identifies that South Cambridgeshire District Council is keen to explore the potential for a retirement village in the district, alongside affordable homes for care workers needed to support older people with more complex needs.

Based on the [Older People's Housing: Care and Support Needs in Greater Cambridge 2017- 2036](#) report (Sheffield Hallam University and University of Sheffield, November 2017), the housing strategy recommends that:

- approximately 5% of new homes to be age exclusive, and likely to take the form of mainstream housing built with older people in mind by meeting Building Regulations Part M4 (2 or 3),
- around 7% of homes to be specialist housing for older people, and this could take the form of care ready type accommodation or extra care, dependent on availability of revenue funding from the County Council, and
- appropriate provision of additional care beds, consisting of residential and/or nursing care taking into account health and social care policy requirements.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) includes Policy 47: Specialist housing that is a criteria based policy to be used when considering proposals for new specialist housing developments.

The adopted South Cambridgeshire Local Plan (September 2018) does not include a policy for use when considering proposals for new specialist housing developments, however the supporting text to Policy H/9: Housing Mix sets out that specialist accommodation for the elderly should be located on sites within new settlements or larger villages and provided on a mixed tenure basis.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils need to provide market and affordable homes that meet the varied needs of their communities, including for older people, and ensure that those who need specialist housing or are vulnerable can find a home that is right for them. The 'First Conversation' consultation recognised that providing suitable homes in the right locations for those looking to downsize would also enable family homes to be freed up, making best use of the housing that exists already.

Overall, the comments received supported the creation of balanced and integrated communities by providing a mix of housing types, sizes and tenures that reflect the findings of the Councils evidence of housing needs of specific groups. This included support for including specialist housing within new developments to enable residents to move through different forms of housing while still staying in their local area. Respondents also commented that specific allocations should be made for specialist

housing, that are close to existing homes, public transport, and medical and community facilities.

Evidence Base

The [Older People’s Housing: Care and Support Needs in Greater Cambridge 2017-2036](#) report (Sheffield Hallam University and University of Sheffield, November 2017) develops a model to estimate supply and demand for older people’s housing. Using the model developed, the report estimates the need for different forms of specialist accommodation for older people by 2035, and concludes that in Greater Cambridge:

- 917 additional age exclusive homes are needed,
- 2,741 additional self-contained specialist homes in the form of sheltered accommodation or extra care accommodation are needed, and
- 1,724 additional care beds are needed.

This need is in addition to the already known shortfall in provision at 2016 as estimated by the model. The current supply at 2016, the recommended supply at 2016, and the recommended supply at 2035 for Greater Cambridge as set out in the report are as follows:

Type of older peoples accommodation	Current total supply at 2016	Recommended total supply at 2016	Recommended total supply at 2035
Age exclusive homes	239	1,145	2,062
Specialist self-contained housing	3,280	3,422	6,163
Care beds	1,825	2,152	3,876

The report also compares its own model results to those estimated by the SHOP@ model, which is an existing alternative model, and concludes that both models suggest there is a current undersupply of specialist housing for older people and that future demands are likely to place major pressures on existing provision. The report sets out that these estimates should be the basis on which more informed policy making can take place, but recognises that demand can and will be met in various ways, shaped by various interventions by public bodies, and voluntary and private providers.

The [Cambridgeshire and West Suffolk Specialist Housing Need](#) report (Cambridgeshire County Council, Autumn 2019) identifies what housing provision there was in 2016 for people in Cambridgeshire aged 18-64 with disabilities or

mental health issues, and indicates future need for specialist housing in Cambridgeshire at 2036. Based on population forecasts and projecting forwards existing prevalence rates of disabilities and mental health issues, the report indicates that within Cambridge an additional 25 specialist housing units for these client groups would be needed by 2036 and within South Cambridgeshire an additional 22 units would be needed by 2036. The report makes clear that the estimates are based on business as usual, and assumes no change in the nature of specialist housing provision.

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) reports that based on the population projections that GL Hearn have developed, that are linked to the standard methodology calculations for identifying housing needs, there is predicted to be a significant ageing of the population within the study area between 2020 and 2040 – those aged 65 and over are projected to increase by 52%, compared to an overall population growth in the study area of 21%. The study highlights that a broadly similar trend is expected in each of the districts, with the exception of Cambridge.

The study highlights that older people tend to live in under-occupied homes, and therefore if the existing housing stock is used more efficiently and new suitable smaller homes were provided within existing communities, this would enable older people to 'downsize'. The study suggests that retirement villages are one way of encouraging 'downsizing' provided that they deliver homes for different income levels, of different tenures, and of different house types and sizes. The study recognises that high services charges on retirement villages can impact on the feasibility of affordable housing and also that providing affordable housing on these specialist housing schemes is less viable for developers.

The study considers the need for specialist housing in each district using a model that analyses existing prevalence rates for these types of specialist housing within the current population of the study area and applying them to the projected population profile for the study area, along with consideration of the likely tenure requirements within each district based on levels of deprivation, and existing supply of specialist housing. The study estimates that at 2040 there will be a surplus of sheltered housing (rented housing with support) in Cambridge and South Cambridgeshire, but that there will be a significant shortfall of retirement housing (leasehold housing with support) and both rented and leasehold housing with care (extra care and enhanced sheltered accommodation) in all districts in the study area. The study also estimates that at 2040 there will be a shortfall in care and nursing home bedspaces in all districts in the study area.

The figures for Cambridge and South Cambridgeshire at 2040 are as follows:

District / Specialist housing	Cambridge	South Cambridgeshire
Housing with support – rented	Surplus of 289 self-contained units	Surplus of 502 self-contained units
Housing with support – leasehold	Shortfall of 643 self-contained units	Shortfall of 1,447 self-contained units
Housing with care – rented	Shortfall of 121 self-contained units	Shortfall of 192 self-contained units
Housing with care – leasehold	Shortfall of 300 self-contained units	Shortfall of 473 self-contained units
Residential care and nursing homes (Use Class C2)	Shortfall of 179 bedspaces	Shortfall of 1,613 bedspaces

The study explains that these estimates should be considered as providing a set of parameters, and that the actual level of provision needed will be influenced by broader local strategies for older peoples housing and care which are being developed by Cambridgeshire County Council.

The study has confirmed that the national ratios within the Housing Delivery Test rulebook to convert older peoples bedspaces to a dwelling equivalent to allow them to be counted towards delivering the housing requirement are appropriate for Greater Cambridge.

The Housing Needs of Specific Groups – Greater Cambridge Addendum (GL Hearn, 2021) sets out the impacts of the changes in demography for the different growth level options on the need for specialist housing in Greater Cambridge. For each of the growth level options it estimates that at 2041 there will be a surplus of sheltered housing (rented housing with support) in Cambridge and South Cambridgeshire, but that there will be a shortfall of retirement housing (leasehold housing with support) and both rented and leasehold housing with care (extra care and enhanced sheltered accommodation). It also estimates that for each of the growth level options at 2041 there will be a shortfall in care and nursing home bedspaces in both Cambridge and South Cambridgeshire.

The figures for Cambridge and South Cambridgeshire at 2041 for the preferred housing requirement (described as medium 1:1 commuting) are as follows:

District / Specialist housing	Cambridge	South Cambridgeshire
Housing with support – rented	Surplus of 260 self-contained units	Surplus of 477 self-contained units
Housing with support – leasehold	Shortfall of 690 self-contained units	Shortfall of 1,496 self-contained units
Housing with care – rented	Shortfall of 134 self-contained units	Shortfall of 203 self-contained units
Housing with care – leasehold	Shortfall of 314 self-contained units	Shortfall of 488 self-contained units
Residential care and nursing homes (Use Class C2)	Shortfall of 246 bedspaces	Shortfall of 1,677 bedspaces

Cambridgeshire County Council are currently considering the future provision of accommodation based care for older people in Cambridgeshire and Peterborough, and are forecasting future demand on an individual district basis taking account of existing supply, projected population changes, and the changing way that care is provided by supporting more independent living and providing care based on the individual level of need and as required.

The strategic sites included in the Councils adopted Local Plans (2018) and Area Action Plans include provision of specialist accommodation as follows:

Site	Provision of specialist accommodation
Eddington	Outline planning permissions (11/1114/OUT & S/1886/11) approved in February 2013 include provision for up to 6,500 sqm of senior living (Class C2). The Senior Care Needs Statement (September 2011) submitted with the outline planning application sets out that the facility of up to 6,500 sqm is sized sufficiently to allow for a senior care home or self-contained residential extra care units, however further details are then provided that explain that a senior care centre would provide 75 bedrooms, large lounges, restaurant, kitchens and other back of house services.

Site	Provision of specialist accommodation
Darwin Green	No provision of specialist accommodation on Darwin Green 1. The planning application process for Darwin Green 2/3 has not yet started.
Cambridge East – North of Newmarket Road (WING / Marleigh)	No provision of specialist accommodation.
Cambridge East – North of Cherry Hinton	Outline planning permissions (18/0481/OUT & S/1231/18/OL) approved in December 2020 for a maximum of 1,200 homes (including retirement living facility). The Planning Statement submitted with the outline planning applications refers to a retirement living facility of potentially 90 bedspaces. The agent (on behalf of Bellway Homes) has advised that any Use Class C2 older peoples bedrooms would be part of the overall 1,200 dwellings on the site.
Northstowe	<p>Phase 1: outline planning permission (S/0388/12/OL) approved in April 2014 for up to 1,500 dwellings and residential institutions. The application form for this planning application includes 1,500 sqm of C2 uses.</p> <p>Phase 2: outline planning permission (S/2011/14/OL) approved in January 2017 for up to 3,500 dwellings. The Planning Statement for this application sets out that an element of C2 use (either student accommodation or supported housing) will be provided, but that exact numbers will not be known until the reserved matters application stage.</p> <p>Phase 3a: an outline planning application (20/02171/OUT) for up to 4,000 homes was submitted in May 2020. The Planning Statement for this application sets out that the residential uses will include use classes C2 (residential institutions), C3 (dwellings) and C4 (houses in multiple occupation) but that the mix is unknown at this outline application stage.</p> <p>Phase 3b: an outline planning application (20/02142/OUT) for up to 1,000 homes was submitted in May 2020. The Planning Statement for this application sets out that the residential mix is unknown at this outline application stage.</p>

Site	Provision of specialist accommodation
Waterbeach New Town	Outline planning permission (S/0559/17/OL) approved in September 2019 for up to 6,500 dwellings (including up to 600 residential institutional units) on the western part of the site. The Council's planning committee in January 2021 gave officers delegated powers to approve an outline planning application (S/2075/18/OL) for up to 4,500 dwellings (including up to 450 units within use class C2) on the eastern part of the site, subject to the completion of a s106 agreement.
Bourn Airfield New Village	The Council's planning committee in February 2021 gave officers delegated powers to approve an outline planning application (S/3440/18/OL) for approximately 3,500 dwellings and residential institutions (up to 250 units of C2 use), subject to the completion of a s106 agreement.
Cambourne West	No provision of specialist accommodation.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

Provision of specialist housing will be required as part of the housing mix of new developments, particularly at new settlements and within urban extensions, to create balanced and mixed communities and to meet the identified need for specialist housing.

Proposals for new specialist housing will be considered via a criteria based policy similar to that in the adopted Cambridge Local Plan 2018, but with the policy applying to the whole of Greater Cambridge. The criteria will ensure that new specialist housing is provided where there is a need, in suitably accessible locations, and without resulting in an excessive concentration of such housing.

Any specialist accommodation provided either as self-contained units or bedspaces for older people will contribute towards delivering the overall housing requirement for Greater Cambridge, but any specialist housing for other groups such as children and young people, or people with disabilities, will not contribute.

The provision of some forms of specialist housing, such as general housing for older people, will be delivered through the requirements for all new homes to be

accessible and adaptable homes as set out in Building Regulations M4(2) standard (see H/SS: Residential space standards and accessible homes).

Reasons for the proposed policy direction

National planning policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies.

The Local Plan therefore needs to set out how the Councils will deliver sufficient specialist housing to meet the identified need and how proposals for new specialist housing will be considered.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. No policy. Not considered a reasonable alternative as the Councils consider that a criteria based policy is needed as the considerations for specialist housing are different to other types of housing development.
2. To not require provision for specialist housing at new settlements and within urban extensions. Not considered a reasonable alternative as the Councils need to set out how they will deliver sufficient specialist housing to meet the identified need, and these new developments should seek to deliver balanced and mixed communities.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

Cambridgeshire County Council are currently considering the future provision of accommodation based care for older people in Cambridgeshire and Peterborough, and are forecasting future demand on an individual district basis taking account of existing supply, projected population changes, and the changing way that care is provided by supporting more independent living and providing care based on the individual level of need and as required. Therefore, as part of the preparation of the draft version of the Greater Cambridge Local Plan, the Councils will consider the findings of this study, and use this along with the existing evidence to inform the development of its planning policies for specialist accommodation.

11.H/CB Self and Custom Build Homes

Issue the Plan is Seeking to Respond to

National planning policy requires the housing needs of particular groups, including those who wish to commission or build their own homes, to be reflected in planning policies. National legislation requires local authorities to keep a register of those people seeking to acquire serviced plots within the area for their own self-builds and/or custom builds and through the same legislation local planning authorities have a duty to have regard to this register and grant planning permission for enough suitable plots to meet the identified demand.

Policy Context

National Context

Paragraph 62 of the [National Planning Policy Framework](#) (NPPF 2021) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. People wishing to commission or build their own homes are specifically listed as one of the groups. The NPPF 2021 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

Self-build and custom-build housebuilding is defined in the Glossary of the NPPF 2021 as “housing built by an individual, a group of individuals, or persons working with them or for them, to be occupied by that individual. Such housing can be either market or affordable housing”.

Under the [Self Build and Custom Housebuilding Act 2015](#) and [Housing and Planning Act 2016](#), local authorities are required to keep a register of those seeking to acquire serviced plots within the area for their own self-build and/or custom housebuilding, and local planning authorities have a duty to have regard to the register and to give enough suitable development permissions to meet the identified demand. This legislation also provides a legal definition of self-build and custom-build housing for the purposes of applying the Acts.

The level of demand is established from the number of entries added to the register each year (known as the ‘base period’, and each year runs from 31 October to 30 October), and at the end of each year (‘base period’) a local planning authority has three years in which to give permission for the equivalent number of serviced plots of land for self-build or custom-builds.

The [self-build and custom housebuilding](#) section of the Planning Practice Guidance (PPG, updated February 2021) provides more detailed guidance on the register and

the duty of the local planning authority to give suitable development permissions. The PPG sets out that as a minimum anyone wishing to be added to the register must provide their name and address, but that local authorities can record additional information as part of the registration process, such as size of household, a preferred location, the type of project – self or custom build, a preferred size of dwelling, and/or their budget. It also sets out that local authorities can set a local connection test and/or a financial solvency test, where they have strong justification for doing so.

The PPG (Paragraph: 016 Reference ID: 57-016-20210208) states that “in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout. Off-plan housing, homes purchased at the plan stage prior to construction and without input into the design and layout from the buyer, are not considered to meet the definition of self-build and custom housing”.

The PPG sets out that where a local connection test is set, the self and custom build register should be in two parts – anyone who registers and meets all the eligibility criteria must be entered on Part 1, while those who meet all the eligibility criteria except for the local connection test must be entered on Part 2. The PPG states that entries on part 2 of the register do not count towards the demand for the purpose of meeting the duty to grant planning permissions.

The PPG advises that local authorities should consider how local planning policies can address self and custom build housing to ensure that enough serviced plots are given permission, and the guidance provides two examples - a number of units required as part of certain allocated sites or on certain types of site.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023 and Annexes 1-8: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) sets out that within South Cambridgeshire there is an expectation that new developments will support the delivery of self and custom build homes, and that South Cambridgeshire District Council will be seeking around 5% of homes on large sites to be for self or custom build homes. The housing strategy also sets out that where market homes are delivered as part of rural exception sites (for affordable housing) on viability or deliverability grounds that an element of these market homes could be for self-build.

The housing strategy also indicates that there may also be scope to promote self-build for households wishing to downsize, by bringing forwards development within their own garden, but that this would be subject to Local Plan policy.

Adopted Local Plans

There is no specific policy relating to self and custom build housing in the adopted Cambridge Local Plan (October 2018).

The adopted South Cambridgeshire Local Plan (September 2018) includes as part of Policy H/9: Housing mix that on all sites of 20 or more dwellings, and in each phase of strategic sites, developers will supply dwelling plots for sale to self and custom builders. The policy also sets out that where a plot(s) has been made available and appropriately marketed for at least 12 months and has not been sold, the plot(s) can either remain on the market or be built out by the developer. Exceptionally, no provision will be expected in developments or phases of developments which comprise high density multi-storey flats and apartments.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils would need to consider the demand for self-build and custom build housing from the Councils' registers and how the local plan can help deliver sites for self-build.

The comments received highlighted both a shortfall in the provision of self and custom build in Greater Cambridge compared to demand on the Councils register, and that the register is likely to overestimate demand due to the attractiveness of the area and the ability to be included on more than one register. Some respondents suggested that the Councils should promote self and custom build opportunities on the edges of villages as exceptions to policy, where development of small sites and gardens would not result in wider harm. The comments received highlighted the need to include a mechanism for the delivery of self-build plots that are not taken up within a specified timescale, and also that the viability of requiring self and custom build plots on new development should be sufficiently tested to ensure that other infrastructure such as affordable housing is not put at risk.

Evidence Base

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) records the total number of entries collectively and individually as at 2019/2020 on all the self and custom build registers in the housing market area. To assess the likely continuing demand for self and custom build plots, GL Hearn have calculated that this historic data equates to approximately 250 new entries each year on the registers across the housing market area, and approximately 164 new entries each year on the register for Greater Cambridge. The study recognises that there is nothing to prevent individuals or groups of individuals registering on more than one self and custom build register, and therefore there is likely to be double counting of demand across the study area and country. The study sets out that Councils do not

have an option to reduce the provision of self and custom build plots to take account of this.

As part of the study, GL Hearn have also sought to understand the strength of demand for self-build homes by speaking to local estate agents. A limited number of responses were received, and these responses were based on anecdotal evidence of their experience, however the suggestion from estate agents is that there is a strong demand for self-build plots within the housing market area.

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) records the adopted planning policies relating to self and custom build homes within the housing market area, and also provides some examples from outside the area. The policy examples provided in the study generally seek 5% of plots on major developments / strategic sites to be provided as self or custom build homes. GL Hearn recommend that all local authorities should have a policy that encourages self and custom build homes to be provided on all sites, with a specific requirement for strategic sites. The study states that the exact level required should be determined with reference to: the number and capacity of strategic sites; the overall level of need as identified on the register; existing committed supply; the need for other types of housing (including affordable housing); and viability.

The Housing Needs of Specific Groups – Greater Cambridge Addendum (GL Hearn, 2021) states that as the assessment of demand for self and custom build homes does not draw on demographic projections, the alternative housing growth level options considered have no impact on the demand for self and custom build housing.

Cambridge City Council and South Cambridgeshire District Council have a joint self and custom build register, that has been open since April 2016. Information on an entrant's preferences are recorded through the registration process; however the Councils do not currently apply either a local connection test or a financial solvency test.

Between April 2016 and October 2020, 639 entries have been added to the Greater Cambridge self and custom build register (see Appendix 2), which equates to approximately 140 entries a year. Data extracted from the register in terms of preference for the location of plots, and type and size of property, and data on the number of plots with planning permission is provided in Appendix 2. The data shows that entrants on the register tend to be looking for plots for detached homes and for 3 or 4 bed homes.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

5% of all new homes in residential developments of 20 dwellings or more will be required to be custom and/or self-build, provided that the Greater Cambridge self and custom build register is recording a demand for self and/or custom build homes when a planning application for 20 or more homes is considered.

A mechanism will be included within the policy to allow for plots identified to be for self and/or custom build homes to be delivered by the developer or others if the plot has not been sold as a self or custom build plot after at least 12 months of appropriate marketing.

Proposals for individual or small groups of custom and/or self-build homes will be considered against the policies that would apply to proposals for residential development in that location.

The policy will also allow for 'community led' self and/or custom build projects where the 'community' has formed an organisation as required by the national self and custom build legislation and their proposed self and/or custom build development is compliant with the proposed policy approach.

Reasons for the proposed policy direction

National planning policy requires the housing needs of particular groups, including those who wish to commission or build their own homes, to be reflected in planning policies and local planning authorities have a duty to grant planning permission for enough suitable plots to meet the identified demand.

The Local Plan therefore needs to set out how the Councils will deliver sufficient self and/or custom build homes to meet demand and how proposals for self and/or custom build homes will be considered.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. To allow the development of custom and/or self-build housing generally as an exception to policy. This is not the preferred approach as it is likely to hamper the delivery of rural exception sites for affordable housing.
2. No policy. Not considered a reasonable alternative as the Councils have a duty to permit sufficient plots to meet demand and the provision of sufficient plots is unlikely without a policy.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

12.H/BR Build to Rent Homes

Issue the Plan is Seeking to Respond to

National planning policy requires the size, type and tenure of homes needed for different groups in the community, including those who rent their homes, to be assessed and that the results of that assessment be reflected in planning policies.

Policy Context

National Context

Paragraph 62 of the [National Planning Policy Framework](#) (NPPF 2021) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community including those who rent their homes, and reflect the results of this assessment in their planning policies. The NPPF 2021 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

Build to Rent is a specific form of private rented sector accommodation and is defined in the Glossary of the NPPF 2021 as “purpose built housing that is typically 100% rented out” and it also states that “schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control”.

The [Build to rent](#) section of the Planning Practice Guidance (PPG, published September 2018) sets out that the affordable homes within a Build to Rent development should be provided as Affordable Private Rent homes, and that 20% is generally a suitable benchmark for the level of Affordable Private Rent homes to be provided. The PPG outlines that if local authorities wish to set a different proportion of Affordable Private Rent homes that they should justify this using evidence, and set this out within their Local Plan. Guidance is also provided on how the rent for the Affordable Private Rent homes should be calculated and on scheme management.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023 and Annexes 1-8: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) recognises that private rented accommodation can help support the needs of those on middle incomes who come to work in the area but cannot afford to live locally. It sets out that where a need for private rented sector accommodation has been identified, the Councils will seek a range of unit sizes and types for different income levels and the provision of Affordable Private Rent. The [Greater Cambridge Housing Strategy Annex 9: Build to Rent](#) (Cambridge City Council and

South Cambridgeshire District Council, June 2021) provides additional detailed guidance on the Councils' requirements for new build to rent developments.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) does not include a policy for use when considering proposals for Build to Rent homes or developments.

The adopted South Cambridgeshire Local Plan (September 2018) does not include a policy for use when considering proposals for Build to Rent homes or developments, however within paragraph 7.36 (which is part of the supporting text for Policy H/9: Housing Mix) it states that the Council will support the private rented sector to grow through build to let, to meet the growing demand for rented homes as part of the market element of housing developments.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils would need to consider how Build to Rent homes should form part of the housing mix.

Overall, the comments received supported the creation of balanced and integrated communities by providing a mix of housing types, sizes, tenures, ownership and management that reflect the findings of the Councils evidence of housing needs of specific groups. This included support for private rented / Build to Rent accommodation, as part of making housing more widely accessible. Respondents also commented that specific allocations should be made for Build to Rent developments.

Evidence Base

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) highlights that the private rented sector has grown significantly in the study area between 2001 and 2011, with a growth of 101% for the study area as a whole. The study reports that growth within Cambridge is lower with a 68% change between 2001 and 2011, while within South Cambridgeshire the change is 113% over the same period. The study also provides more recent estimates that suggest an increase of 10.1% in private rented homes in Cambridge between 2012 and 2018, with a slight decrease of 3.3% within South Cambridgeshire in the same period.

The study has not estimated the need for additional private rented housing as whether people buy or rent their homes is dependent on several factors that can fluctuate over time such as mortgage lending practices, availability of housing related benefit, and existing types and tenures of homes available in the area.

The study highlights that Cambridge is unusual compared to other similar sized regional cities as it currently has very few Build to Rent developments. The study outlines that demand for Build to Rent is still embryonic and therefore that it is difficult to accurately predict its location and scale, but that research by Savills is clear that developer interest has focussed on urban areas. The study therefore suggests that demand is likely to be within Cambridge and the immediately surrounding villages, from students, academics and young professionals.

The study recommends that the Councils are supportive of Build to Rent developments, subject to their location and the characteristics of the site and affordable private rented homes being provided. The study recommends monitoring the take up of developments completed within the study area as an indication of demand.

As outlined above, the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) has not estimated the need for additional private rented housing. The Housing Needs of Specific Groups – Greater Cambridge Addendum (GL Hearn, 2021) therefore does not estimate the need for additional private rented housing for the different growth level options.

The [Build to Rent Market in Greater Cambridge and West Suffolk](#) report (Savills, June 2020) considers the housing market within the study area and the demand for private rented housing, the potential role that Build to Rent developments can play on large scale new developments, and other potential locations suitable for these developments. The report outlines that the high house prices within the study area make Cambridge and South Cambridgeshire unaffordable to many potential buyers, and this creates a demand for rented accommodation. The report also highlights that private rented households typically cluster close to employment opportunities or university campuses. The report acknowledges that Build to Rent could be provided on almost any site where build to sell can be provided, but that the majority of Build to Rent schemes that have been brought forward are in more urban locations due to both the lower level of competition for these sites with housebuilders but also that these locations more closely align with the highest demand for private rented homes. The report includes information on how investors select where to bring forward Build to Rent schemes, such as the typical demographic information considered, the strength of the local economy, proximity to good transport connectivity, the local housing market, access to appropriate social infrastructure and local amenities, and capital values and likely rental values.

The report sets out that the average size of a completed Build to Rent scheme is 133 homes, with only a few Build to Rent schemes of over 250 homes completed so far, but that developments of over 1,000 private rented sector homes are now coming forwards in London and Manchester. The report states that the majority of Build to Rent schemes are delivering wholly or mostly apartments, and that this is mainly due

to their location; however it also makes clear that Build to Rent homes can be provided as houses, and some are being delivered by PlaceFirst and Sigma.

The [Build to Rent Market Strategic Overview and Summary of Site-Specific Appraisals](#) report (Arc4, March 2021) outlines the policy approaches to Build to Rent developments that have been taken by other urban locations, provides feedback from registered providers and investors on Build to Rent developments, considers the role and risks of Build to Rent developments and their implications for place shaping, and sets out recommendations in terms of the content of planning policies for Build to Rent developments. Site specific appraisals were completed for nine strategic sites and the report concludes that there is clearly an opportunity for Build to Rent in each of these developments. The report makes clear that there may be other sites that offer the opportunity for Build to Rent that have not been considered as part of this study, such as town centre or regeneration sites located close to public transport.

Four of the six site specific appraisals completed were for developments within Greater Cambridge – [North East Cambridge](#), [Northstowe](#), [Waterbeach New Town](#) and [Bourn Airfield New Village](#). These appraisals outline that Build to Rent schemes have the potential to contribute towards the delivery of the strategic objectives / principles for each development, and that there is clearly an opportunity for Build to Rent in each of these developments.

The report recommends that the following should be included in planning policies for Build to Rent developments:

- a minimum of 20% Affordable Private Rent is provided, unless the Councils wish to seek a higher percentage based on local evidence and taking into account viability;
- a range of unit sizes is provided, including family sized units, in line with up to date evidence, and that all units should be self contained;
- Affordable Private Rent homes should be distributed throughout the development and be physically indistinguishable from the market rent homes in terms of quality and size;
- all homes should be under common management, with access to the same facilities, and there should be on-site staff;
- a minimum three year tenancy should be offered and the tenancy agreement should be clear on the process for rent reviews and renewals;
- deposits should be held securely and all rents should be inclusive of service charges;
- Affordable Private Rent homes should be let at an agreed discount from the local market rent of an equivalent home, with the discount reflecting local affordability;
- consideration of whether the first priority for the Affordable Private Rent homes should be given to those with an agreed local connection, and / or

whether a proportion of the Affordable Private Rent homes should be tethered to local employers or secured for other local needs;

- any affordable homes should be secured in perpetuity and a covenant period of 15 years should be considered for the retention of the private market rented homes with a clawback mechanism;
- consideration of the potential implications of the Build to Rent scheme on place shaping;
- the minimum number of units for a Build to Rent scheme on a strategic site should be 50 homes, with the maximum number to be determined by evidence demonstrating how the scheme will support the place shaping agenda, meet local housing need, complement the existing or proposed surroundings in terms of scale, and takes account of wider policy considerations including overall scheme viability; and
- any applications for Build to Rent schemes should be based on clear evidence of need.

The following table sets out the implications of Build to Rent homes on the provision of affordable homes, assuming that 20% of the Build to Rent homes are Affordable Private Rent homes (as set out in national planning guidance) and that the overall proportion of affordable homes on the development is consistent with the proposed policy approach for 40% affordable homes (as set out in H/AH above).

Size of development / amount of Build to Rent	No Build to Rent	All Build to Rent	50% Build to Rent	30% Build to Rent	10% Build to Rent
5,000 homes	3,000 market homes 2,000 affordable homes	4,000 market Build to Rent 1,000 affordable private rent (20% affordable)	2,000 market Build to Rent 500 affordable private rent (20% affordable) 1,000 market homes 1,500 affordable homes (therefore 60% affordable to provide 40% affordable overall)	1,200 market Build to Rent 300 affordable private rent (20% affordable) 1,800 market homes 1,700 affordable homes (therefore 48.6% affordable to provide 40% affordable overall)	400 market Build to Rent 100 affordable private rent (20% affordable) 2,600 market homes 1,900 affordable homes (therefore 42.2% affordable to provide 40% affordable overall)

Size of development / amount of Build to Rent	No Build to Rent	All Build to Rent	50% Build to Rent	30% Build to Rent	10% Build to Rent
1,000 homes	600 market homes 400 affordable homes	800 market Build to Rent 200 affordable private rent (20% affordable)	400 market Build to Rent 100 affordable private rent (20% affordable) 200 market homes 300 affordable homes (therefore 60% affordable to provide 40% affordable overall)	240 market Build to Rent 60 affordable private rent (20% affordable) 360 market homes 340 affordable homes (therefore 48.6% affordable to provide 40% affordable overall)	80 market Build to Rent 20 affordable private rent (20% affordable) 520 market homes 380 affordable homes (therefore 42.2% affordable to provide 40% affordable overall)

Size of development / amount of Build to Rent	No Build to Rent	All Build to Rent	50% Build to Rent	30% Build to Rent	10% Build to Rent
100 homes	60 market homes 40 affordable homes	80 market Build to Rent 20 affordable private rent (20% affordable)	40 market Build to Rent 10 affordable private rent (20% affordable) 20 market homes 30 affordable homes (therefore 60% affordable to provide 40% affordable overall)	24 market Build to Rent 6 affordable private rent (20% affordable) 36 market homes 34 affordable homes (therefore 48.6% affordable to provide 40% affordable overall)	8 market Build to Rent 2 affordable private rent (20% affordable) 52 market homes 38 affordable homes (therefore 42.2% affordable to provide 40% affordable overall)

The data shows that where a development only provides 10% Build to Rent homes (of which 20% are Affordable Private Rent), the proportion of affordable homes needed on the other 90% of the homes in the development to deliver the proposed policy approach of 40% affordable homes across the development is only marginally higher than 40%. However, the data shows that where a larger proportion of Build to Rent homes are provided (and the Affordable Private Rent provided is 20%), the proportion of affordable homes needed from the other homes within the development to meet the proposed policy approach of 40% affordable homes across the development is much higher.

The data also shows that where only 10% of a development is provided as Build to Rent homes, the overall development size would need to be at least 500 homes to have sufficient Build to Rent homes, based on the Build to Rent Market Strategic Overview and Summary of Site-Specific Appraisals report (Arc4, March 2021) that

recommends the minimum number of units for a Build to Rent scheme on a strategic site should be 50 homes.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

The policy will require that proposals for Build to Rent developments, or the amount of Build to Rent within a mixed tenure development, do not create an over-concentration of this tenure in a local area, are distributed across the development (if part of a wider mixed use or mixed tenure development), and meet specific criteria in terms of ownership and management, covenants, and tenancies. No more than 10% of the total housing on a mixed tenure development of 500 or more dwellings should be Build to Rent.

Build to Rent developments should meet the requirements as set out in the [Greater Cambridge Housing Strategy Annexe 9: Build to Rent](#) (Cambridge City Council and South Cambridgeshire District Council, June 2021) or a successor document.

The policy will require at least 20% of homes on a Build to Rent development of 10 or more homes to be affordable private rented, and make clear that these homes will contribute towards the overall 40% affordable homes to be provided on a mixed tenure development. Affordable private rented homes must be designed to be indiscernible from market homes and that the affordable homes should be distributed throughout the site in small groups or clusters.

As new homes, all Build to Rent developments must meet the nationally described residential space standards and accessible homes standards, as set out in H/SS.

Reasons for the proposed policy direction

National planning policy requires the housing needs of different groups, including those who rent their homes, to be reflected in planning policies. There is evidence of local need for this type of housing, and therefore the Local Plan needs to be clear how any proposals for these types of development will be considered.

As national planning policy sets out that 20% is generally a suitable benchmark for the level of affordable housing to be provided on a Build to Rent development, these developments are unlikely to achieve the 40% affordable homes as required on other residential developments. Given this and that Build to Rent developments will only provide one tenure of affordable housing, it is therefore necessary to limit the proportion of Build to Rent homes within new developments in order to secure the provision of affordable housing to meet our identified need and provide mixed and

balanced communities. The limit however still needs to enable the resulting number of Build to Rent homes to be sufficient to be viably delivered and managed.

Based on evidence of high levels of affordable housing need, the Councils will aim wherever possible to secure more than 20% of the homes on any Build to Rent scheme to be provided as Affordable Private Rent homes, looking in particular for a balance between the percentage of Affordable Private Rent homes which can be achieved and the potential rental affordability of those homes.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. No policy. Not considered a reasonable alternative as national planning policy requires the housing needs of different groups, including those to rent their homes, to be reflected in planning policies. There is evidence of local need for this type of housing, and therefore the Local Plan needs to be clear how any proposals for these types of development will be considered.
2. To include a policy with a presumption against Build to Rent developments. This is not the preferred approach as national planning policy requires the housing needs of different groups, including those who rent their homes, to be reflected in planning policies. There is evidence of local need for this type of housing, and therefore the Local Plan needs to be clear how any proposals for these types of development will be considered.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

13.H/MO Houses in Multiple Occupation (HMOs)

Issue the Plan is Seeking to Respond to

Houses in Multiple Occupation (HMOs) form an important part of the housing market in Cambridge, with a significant number of HMOs occupied by students. The high cost of housing in Cambridge makes HMOs a more affordable option for many than self-contained accommodation. HMOs can change the nature of an area, and can be seen to be associated with negative impacts to neighbourhoods, such as anti-social behaviours, car parking issues, and overcrowding. The conversion of family size dwellings to HMOs also reduces the opportunities for families to buy or rent houses.

Policy Context

National Context

The [National Planning Policy Framework](#) (NPPF 2021) does not specifically reference Houses in Multiple Occupation (HMOs), however as part of achieving sustainable development it sets out that a sufficient range of homes should be provided to meet the needs of present and future generations. Paragraph 62 of the NPPF 2021 also requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies.

A HMO is defined in the [Housing Act 2004](#) as being a building or part of a building that consists of living accommodation that is not self-contained as two or more households share basic amenities such as a kitchen and / or a bathroom(s). A household may be an individual, couple or family.

The Use Classes Order defines two different categories of HMO as follows:

- Use Class C4: small shared houses occupied by 3-6 unrelated individuals, who share basic amenities such as a kitchen or bathroom.
- Sui generis use: larger houses occupied by more than 6 unrelated individuals, who share basic amenities such as a kitchen or bathroom.

The General Permitted Development Order allows a dwelling (use class C3) to be converted to a small house in multiple occupation (use class C4) and vice versa without the need for planning permission. Conversion of a dwelling or small house in multiple occupation to a large house in multiple occupation (sui generis use) and vice versa does require planning permission.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023 and Annexes 1-8: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) sets out that well managed Houses in Multiple Occupation (HMOs) have an important part to play in meeting housing needs, offering a more affordable housing solution for single low income households. It outlines that HMOs are predominantly located in Cambridge, but highlights that the Councils will explore what role new build HMOs can play within the strategic sites that straddle the Cambridge-South Cambridgeshire administrative boundary.

Houses in Multiple Occupation (HMOs) that meet specific criteria must be licensed, and there are minimum amenity provisions (including internal space standards) set out in national legislation and defined locally that must be met to secure a license. [Cambridge City Council](#) and [South Cambridgeshire District Council](#) provide guidance notes on the amenity requirements that must be met for licensing purposes. The SCDC guidance notes recommend that the minimum amenity provisions are achieved in all HMOs, irrespective of whether the building requires a mandatory licence or not.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) includes Policy 48: Housing in multiple occupation that is a criteria based policy to be used when considering proposals for new large HMOs (sui generis use).

The adopted South Cambridgeshire Local Plan (September 2018) does not include a policy for use when considering proposals for new large HMOs (sui generis use).

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils would need to consider how the Local Plan can address the need for shared accommodation, through planning for specifically designed shared accommodation as part of inclusive communities.

Overall, the comments received supported the creation of balanced and integrated communities by providing a mix of housing types, sizes, tenures, ownership and management that reflect the findings of the Councils evidence of housing needs of specific groups. This included support for Houses in Multiple Occupation (HMOs), as part of making housing more widely accessible.

Evidence Base

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) does not provide specific information on the need for new HMOs,

however it reports that 'other households' in Cambridge, such as Homes in Multiple Occupation (HMOs), are projected to increase by 38.3% between 2020 and 2040, and that 'other households' in South Cambridgeshire are projected to increase by 55.0% over the same period.

The Housing Needs of Specific Groups – Greater Cambridge Addendum (GL Hearn, 2021) reports that 'other households' in Cambridge, such as Homes in Multiple Occupation (HMOs), are projected to increase by between 40.4% and 63.1% between 2020 and 2041 depending on the growth level option scenario considered. For South Cambridgeshire, it reports that 'other households' are projected to increase by between 58.1% and 75.0% over the same period and when considering the same growth level option scenarios.

The [Cambridge Private Sector Stock Condition Survey](#) (Cambridge City Council, November 2009) recorded that at that time 12.6% of dwellings in Cambridge were HMOs (an estimated 5,220 dwellings), compared to the national average of 2% of dwellings, and that 1,040 of these HMOs were used by students.

Cambridge City Council has previously commissioned market research to be undertaken with tenants in HMOs to understand their overall perceptions of HMOs, motivations for living in HMOs, and aspirations for future HMOs. The [Research into Houses In Multiple Occupation in Cambridge](#) report (mruk, March 2013) records that most tenants felt there were enough HMOs in Cambridge, but that their choice was reduced both because physical conditions vary drastically with many HMOs not seen to be suitable and as there is an identified split between student and non-student HMOs. The report also records that HMOs were seen as one of the most affordable forms of accommodation in Cambridge, and many tenants cited this as a primary benefit. The report highlights that tenants considered the other benefits to be their convenient locations, and social benefits of shared responsibility and reduced isolation. The report also outlines tenants concerns with HMOs as being the physical conditions (such as dampness, poor insulation, pest problems, and defective locks), the social environment created by the different tenants, the perceptions of shared accommodation by the neighbouring residents, and issues around waste storage.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

We propose to carry forward the criteria based policy for considering proposals for new larger HMOs (sui generis use), as included in the adopted Cambridge Local Plan 2018, but with the policy applying to the whole of Greater Cambridge. The criteria will ensure that new HMOs are provided in suitable locations with appropriate facilities and parking, a good standard of amenity for their occupiers, and will not have significant negative impacts on matters such as the local amenity of the

surrounding area. Reference to Circular 08/2010 will be removed as that has been withdrawn.

We propose that all new larger HMOs (sui generis use which require planning permission) will be required to meet the nationally described residential space standards and accessible and adaptable homes standards, and to provide direct access to amenity space as required for all new homes (see H/SS). We would require all new larger HMOs to meet the internal space standards required for a HMO to be licensed, whether the HMO is required to be licensed or not.

Reasons for the proposed policy direction

National planning policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The Local Plan therefore needs to set out how the Councils will consider proposals for Houses in Multiple Occupation (HMOs) as they form an important part of the housing market in Cambridge. It is also important that HMOs provide a standard of accommodation equivalent to that provided in other new residential developments.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. No policy. This is not the preferred approach as the Councils consider that a criteria based policy is needed as the considerations for HMOs are different to other types of development and therefore it is necessary to safeguard local amenity.
2. To include a policy with a presumption against further HMOs. This is not the preferred approach as it would not allow sufficient flexibility in the housing market to deliver the housing needed for different groups, including students.
3. Not requiring new HMOs to meet space and amenity standards. This is not the preferred approach because national planning policy states that planning policies should ensure that developments create places with a high standard of amenity for existing and future users.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

14.H/SA Student Accommodation

Issue the Plan is Seeking to Respond to

Students make up a significant proportion of the population of Cambridge and student accommodation forms an important part of the housing market in Cambridge. If adequate provision is not made for their needs in suitable locations, this will place significant pressure on the local housing market. New purpose-built student accommodation can also reduce demand for private accommodation, occupied by full-time students. However, it needs to be in the right place, where impacts can be addressed and the need to travel is minimised. This also means student accommodation needs to be protected from conversion unless it is no longer needed by students to avoid increasing demand for housing in the private rental market.

Policy Context

National Context

Paragraph 62 of the [National Planning Policy Framework](#) (NPPF 2021) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including those who require student housing, and reflect the results of this assessment in their planning policies. The NPPF 2021 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations. Paragraph 65(b) of the NPPF 2021 explains that where a site or proposed development provides specialist accommodation for a group of people with specific needs (such as purpose-built student accommodation) the 10% requirement for affordable home ownership is exempt.

The national planning guidance on the assessment of student housing need, published in July 2019, explains how strategic policy-making authorities need to plan for sufficient student accommodation for both communal halls of residence and self-contained dwellings, on and off campus. It advises the provision of more dedicated student accommodation should take pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are therefore encouraged to consider options which would support both the needs of the student population as well as local residents before introducing caps or restrictions on students living outside university-provided accommodation. Consultation with universities and other higher educational establishments will be needed to ensure they understand their student accommodation requirements in their area.

National planning guidance also sets out that communal (use class C2) accommodation provided in the form of bedspaces for students can be counted towards delivering the housing requirement, based on the amount of accommodation

those new bedspaces release to the wider housing market (National Planning Practice Guidance, published July 2019, Paragraph: 034 Reference ID: 68-034-20190722). The [Housing Delivery Test rulebook](#) sets out the ratios to be used to convert bedspaces to dwellings for student accommodation.

Regional / Local Context

The Assessment of Student Housing Demand and Supply for Cambridge City Council, referred to hereafter as the [Cambridge Student Accommodation Study](#) (2017) was completed to support the Cambridge Local Plan, adopted in 2018. It identified that the University of Cambridge anticipated their student numbers to grow by a further 2,874 students to 2026. While Anglia Ruskin University confirmed that it has no student growth aspirations to 2026, other institutions in Cambridge stated aspirations to grow, in total by 230 students to 2026. This gives rise to a total growth figure for the universities and the other institutions of 3,104 to 2026.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) includes Policy 46: Development of student housing. This policy supports new student accommodation that meets identified needs of an existing educational institution within the city of Cambridge in providing housing for students attending full-time courses of one academic year or more. Schemes should demonstrate that they have entered into a formal agreement with at least one existing educational establishment within Cambridge providing full-time courses of one academic year or more. This formal agreement will confirm that the proposed accommodation is suitable in type, layout, affordability and maintenance regime for the relevant institution.

The policy resists permanent purpose-built student accommodation on sites allocated for housing, or with an extant planning permission for residential development, or sites identified as potential housing sites within the Council's Strategic Housing Land Availability Assessment. The policy also protects existing student accommodation from conversion to alternative uses unless adequate replacement accommodation is provided or if it is demonstrated that the facility no longer caters for current or future needs.

The adopted South Cambridgeshire Local Plan (September 2018) does not include any reference to or policy on student accommodation. However, there are locations within South Cambridgeshire where student accommodation could come forward.

Consultation and Engagement

Responses from colleges to the First Conversation highlighted growth plans for student numbers and the importance of planning for these. Many other respondents highlighted the need to include student accommodation needs within the overall

assessment of and planning for housing needs more generally. One respondent argued for the removal of criteria restricting the provision of new student accommodation to those attending a full-time course of one year or more from student housing related policies.

In April/May 2021, additional stakeholder engagement with Anglia Ruskin University and the University of Cambridge was undertaken to better understand their future growth ambitions including the impact of Covid-19.

Anglia Ruskin University

- Anglia Ruskin's residential strategy will be refreshed in 2022 and this will review its strategy and investigate matters such as ownership, nomination agreements, maintenance and the need for buildings.

The University of Cambridge:

- The University and colleges are discussing the future size and shape of the student population and have agreed to determine a 10-year plan by the end of the calendar year.
- Eddington - At present, 2,000 student rooms are permitted under the outline consent. 325 student bedrooms have already been completed. Further development of new student units depends on the growth in student numbers in any individual college, and their ability to raise development finance – this is not within the control of the University as landowner. It is expected that planning applications for all of the 2,000 student units will be submitted by 2033.

Evidence Base

The Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (GL Hearn, 2021) concludes, assuming the same annual growth rates and occupation patterns to 2026 continue up to the 2040/41 academic year, 3,571 student rooms in purpose-built accommodation will be required if all the future student need is to be met. It recommends that the Greater Cambridge authorities should plan to deliver a level of purpose-built student accommodation which is at least in line with this growth of the universities student body (3,571 bedspaces by 2040). It also encourages further delivery of up to 6,085 bed spaces to encourage the release of shared housing back into the wider housing stock.

The study has confirmed that the national ratios within the Housing Delivery Test rulebook to convert student bedspaces to a dwelling equivalent to allow them to be counted towards delivering the housing requirement can be used for Greater Cambridge.

The Housing Needs of Specific Groups – Greater Cambridge Addendum (GL Hearn, 2021) reports that as the need for additional student accommodation is calculated based on evidence provided by the University of Cambridge and Anglia Ruskin University in relation to assumed growth in the student body, there is no change to the recommendations on the need for student accommodation when alternative housing growth level options are considered.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

We propose to support the identified growth for student accommodation over the next ten years for students attending full-time courses of one academic year or more.

New purpose-built student accommodation that reduces demand for private accommodation occupied by full-time students will be supported where consistent with other policies and suitable in location, type, layout, affordability and linked to at least one existing educational establishment within Greater Cambridge providing full-time courses of one academic year or more. Proposals will not be supported where they involve the loss of existing and planned residential accommodation. Existing student accommodation will continue to be protected to avoid increasing demand for housing in the private rental market.

Any student accommodation provided either as self-contained units or bedspaces will contribute towards delivering the overall housing requirement for Greater Cambridge.

Reasons for the proposed policy direction

Students make up a significant proportion of the population of Cambridge and if adequate provision is not made for their needs, in suitable locations this would lead to significant pressures on the local housing market. New purpose-built student accommodation can reduce demand for private accommodation occupied by full-time students. However, it needs to be in the right places, where impacts can be addressed. It is also important that occupancy is linked to at least one existing educational establishment within Greater Cambridge providing full-time courses of one academic year or more. This is to ensure any new student accommodation will be linked to the identified student accommodation need for higher education institutions.

It is important that new student accommodation proposals are not permitted on sites either in residential use or allocated for residential dwellings. The loss of existing residential properties will add pressure on the local housing market, especially if the losses were concentrated in an area close to a university campus. Similarly, the loss

of housing site allocations would undermine the Councils' ability to deliver the area's housing strategy and meet any identified local housing needs. This also means it is necessary to protect existing student accommodation uses unless the use is either suitably replaced, in terms of location and student units, or unless it can be proven that the units are no longer needed. Otherwise, the loss of existing student accommodation will add pressure on the local housing market, especially if the losses are concentrated in an area close to a university campus. This protection will also apply to proposed student accommodation uses on any applicable site allocation. These allocations are intended to help higher education institutions meet their identified growth needs for student accommodation. Without them, student growth will inevitably add to additional pressure on the local housing market.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. No policy. Not considered a reasonable alternative as the Councils consider this policy is needed as the considerations for student accommodation is different to other types of development. It is essential new development proposals are linked to existing higher education institutions and existing student accommodation is protected. This approach will avoid increasing demand for housing in the private rental market.
2. To include a policy with a presumption against further student accommodation. Not considered a reasonable alternative as it would not allow sufficient flexibility in the housing market to deliver the housing needed for different groups, including students.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

Further work with the higher-education institutions in Cambridge will be undertaken to identify their student accommodation growth needs over the next ten years, including the different types of accommodation such as self-contained accommodation for post-graduate students and their families.

15. H/DC Dwellings in the Countryside

Issue the Plan is Seeking to Respond to

South Cambridgeshire is a predominantly rural district with an attractive and much valued open environment. As a result, the area is prone to speculative proposals that could constitute unsustainable development. The policy will use a range of criteria to control development in a way that supports rural communities, reduces unsustainable living patterns and minimises the carbon impacts of new housing.

The plan seeks to provide guidance on residential development in the countryside by bringing together a number of related issues including replacement dwellings, extension to existing dwellings, the re-use of buildings for residential use, dwellings of exceptional quality in the countryside and dwellings to support rural based businesses.

Policy Context

National Context

Paragraph 80 of the [National Planning Policy Framework](#) (NPPF 2021) states:

“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

(a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;

(b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

(c) the development would re-use redundant or disused buildings and enhance its immediate setting;

(d) the development would involve the subdivision of an existing residential dwelling; or

(e) the design is of exceptional quality, in that it:

- is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and

- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.”

The PPG provides guidance on assessing rural worker needs. This includes assessing the role of the worker, the viability of the business and alternative accommodation options.

Regional / Local Context

There is no specific regional or local policy for dwellings in the countryside, other than that set out in the adopted Local Plans.

Adopted Local Plans

The adopted South Cambridgeshire Local Plan addresses these issues through a series of separate policies:

- H/13: Extensions to Dwellings in the Countryside – this sets out that the extension should be in keeping with the scale and character of the existing dwelling and not materially change the impact of the home on its surroundings.
- H/14: Replacement Dwellings in the Countryside – this sets out that one for one replacement dwellings will be allowed where the existing dwelling has not been abandoned, and that the assessment of its design quality, scale, and impact on the countryside and local character will be considered against the relevant policies within the Local Plan. It also makes clear that the replacement of caravans and mobile homes with permanent dwellings will not be permitted.
- H/15: Countryside Dwellings of Exceptional Quality – this sets out that single new bespoke dwellings of exceptional quality will be allowed where: the dwelling will enhance its immediate setting; the nature, size and design of the dwelling and its site are sensitive to the defining characteristics of the local area and to wider views; and the design would reflect the highest standards in architecture.
- H/17: Re-use of Buildings in the Countryside for Residential Use – this sets out that the change of use and adaptation of redundant buildings will be allowed where the buildings are unsuitable for employment use, the buildings are permanent and structurally sound, there will be an enhancement to the immediate setting of the buildings, the form, bulk, design, landscaping and materials are sensitive to the character and appearance of the building and locality, and there is safe vehicular access.
- H/19: Dwellings to Support a Rural-based Enterprise – this sets out that permanent dwellings for full-time workers in agriculture or forestry will be allowed if special circumstances can be demonstrated such as there is a clear functional need for one or more workers to be readily available at most times,

the enterprise has been established for at least three years and is financially viable, there is no other suitable or available accommodation within the site, a dwelling without an occupancy condition on the site has not been sold within the last year, and the proposed dwelling is no larger than required. The policy also sets out that any dwelling permitted will be subject to an occupancy condition, that the removal of the occupancy condition will only be permitted in specific circumstances, and that a temporary dwelling may be permitted where some criteria cannot be met.

The policy areas are not relevant to the Cambridge Local Plan.

Consultation and Engagement

The First Conversation generated little specific discussion on this policy. However, there was more general support for policy approaches that support the rural economy by, for example, protecting employment land and supporting existing businesses in rural areas.

Evidence Base

Residential development in the countryside accounts for a small but significant amount of housing in South Cambridgeshire. By virtue of its location, its potential impact on the environment is even greater. In 2019/20 there were about 90 planning permissions granted for residential development in the countryside. This excludes major developments which were extensions to settlement boundaries and hence also classified as development outside of village boundaries. These 90 permissions, when implemented, will deliver a net gain of 118 dwellings:

- Over half of these schemes were on greenfield sites, one third were on brownfield sites, and the remainder were garden sites.
- About one half of schemes were new build developments, one third involved a change of use or conversion of an existing building (usually an agricultural barn), and the remainder were replacements of existing dwellings.
- Only 2 schemes involved the change of use of employment related buildings, other than in agricultural use, to residential use.
- About 90% of schemes were very small – less than 3 dwellings. Less than 10 schemes involved a net gain of more than 2 dwellings, the largest being 8 dwellings.
- In terms of rural workers, one scheme involved the construction of a dwelling for an agricultural worker, one scheme converted redundant buildings for staff accommodation in a pub, and one scheme for a country house included 2 staff dwellings.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

Residential development is generally restricted in the countryside to avoid unsustainable development, but there are some types of residential development that need a countryside location.

The policy will have a number of sub-components each with its own requirements for the development to be acceptable, and it is proposed that these are carried forward from the South Cambridgeshire Local Plan 2018.

For replacement dwellings in the countryside, set out that they will only be permitted where their design quality, scale, and impact on the countryside and local character are consistent with other policies within the Local Plan, and where a replacement dwelling in the Green Belt is not materially larger than the one it replaces. Make clear that the replacement of caravans and mobile homes with permanent dwellings will not be permitted.

For extensions to existing dwellings in the countryside, set out that the extension must be in scale and character with the existing dwelling and must not materially change the impact of the dwelling on its surroundings. Also set out that where an original dwelling is subject to an occupancy condition, it must be demonstrated that the extension can be supported by the viability of the enterprise and that the cost of its occupation will not be unaffordable to workers that meet the occupancy condition.

For the reuse of buildings in the countryside, set out that the change of use and adaptation of redundant or disused buildings to residential use will be permitted where:

- the buildings are unsuitable for employment use, or it is demonstrated through marketing that there is no demand for their development for employment use,
- the buildings are structurally sound and are of permanent construction,
- there will be an enhancement to the immediate setting of the buildings,
- the form, bulk, design, landscaping and materials used in the change of use and adaptation are sensitive to the character and appearance of the building and locality, and
- there is a safe vehicular site access.

For dwellings to support rural businesses, set out that permanent dwellings will be permitted if it can be demonstrated that: there is a clear need for one or more workers to be readily available at most times, the enterprise has been established for at least three years and is financially viable, there is no other suitable or available

accommodation within the site / holding, and the proposed dwelling is no larger than that required to meet the reasonable needs of the enterprise. Make clear that the new dwelling will be subject to an occupancy condition, and that the removal of the occupancy condition will only be permitted in specific circumstances. Set out when a temporary dwelling may be permitted.

For dwellings of exceptional quality in the countryside, set out that a single new bespoke dwellings of exceptional quality will be permitted provided that:

- the dwelling would reflect the highest standards in architecture and be recognised as truly outstanding or innovative,
- the dwelling would significantly enhance its immediate setting,
- the nature, size and design of the dwelling and site are sensitive to the defining characteristics of the local area and to wider views, and
- that there are no existing dwellings on the site capable of being replaced.

Reasons for the proposed policy direction

Current policies are considered to have been successful in resisting inappropriate development in the countryside whilst providing sufficient flexibility to meet the needs of the rural economy. Our consultation has demonstrated no support for a change in approach. The current policies are being integrated into a single policy with sub-components to make it compatible with the proposed format of the new plan.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy. Not considered a reasonable alternative because it would lead to uncertainty as to how development proposals would be considered.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

16.H/RM Residential Moorings

Issue the Plan is Seeking to Respond to

National legislation requires local authorities to carry out an assessment of the accommodation needs of all people residing in or resorting to their area in houseboats. National planning policy requires local authorities to reflect the results of this assessment in their planning policies.

Policy Context

National Context

The [Housing and Planning Act 2016](#) (by amending the Housing Act 1985) requires local authorities to carry out an assessment of the accommodation needs of all people residing in or resorting to their area in houseboats.

In March 2016, the government published [draft guidance](#) for local authorities on reviewing the housing needs for moorings for houseboats within their area.

Paragraph 62 of the [National Planning Policy Framework](#) (NPPF 2021) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The NPPF 2021 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

Regional / Local Context

Cambridge City Council's [River Moorings Policy 2017-2023](#) sets out its approach to the management of its mooring facilities on the River Cam. The policy acknowledges that the demand for licenced moorings (12-month duration) far outstrips the availability of City Council moorings and that this demand is likely to continue at the same level or increase if the interest in boat dwelling continues. The policy also acknowledges that the availability of mooring spaces on the Council owned sections of the River Cam is extremely limited in comparison to demand.

The policy provides some principles that relate to the planning of river moorings:

- The Council will support the retention of 70 on-line moorings within existing locations.
- The Council through its planning function will support the development of off-line moorings in appropriate locations.

- The Council will install and manage licenced moorings at Riverside Wall subject to technical and financial considerations and statutory approvals where required.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) includes Policy 54: Residential moorings that is a criteria based policy to be used when considering proposals for new residential moorings and that policy also identifies the allocation of site RM1 at Fen Road for off river residential moorings.

The adopted South Cambridgeshire Local Plan (September 2018) does not include a policy for use when considering proposals for new residential moorings, however it does include Policy H/7: Residential Moorings that allocates a site for residential boat moorings at Chesterton Fen Road.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils have a duty to assess the housing needs of those residing in houseboats.

Responses received highlighted the need for more residential moorings within Greater Cambridge.

Evidence Base

The Councils, along with other neighbouring local authorities, have commissioned RRR Consultancy to undertake an Accommodation Needs Assessment (ANA) of Gypsies, Travellers, Travelling Showmen and Bargee Travellers and other Caravan and Houseboat Dwellers in the Cambridge Sub-Region Housing Market Area. It had been anticipated that the ANA would have been completed in time to inform the First Proposals version of the Greater Cambridge Local Plan, however the coronavirus pandemic has delayed the completion of the face-to-face survey elements of the assessment such that it is now not expected until the end of 2021.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

We propose to carry forward the criteria based policy for considering proposals for new residential moorings as included in the adopted Cambridge Local Plan 2018, but with the policy applying to the whole of Greater Cambridge. The criteria will ensure that new moorings are provided in suitable locations with appropriate infrastructure

and will not have significant negative impacts on matters such as landscape and townscape, local amenity, and navigation of the river.

Reasons for the proposed policy direction

National legislation requires local authorities to carry out an assessment of the accommodation needs of all people residing in or resorting to their area in houseboats. National planning policy requires local authorities to reflect the results of this assessment in their planning policies.

The Local Plan therefore needs to set out how the Councils will respond to the need identified and how proposals for residential moorings will be considered.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy. Not considered a reasonable alternative as the Councils consider that a criteria based policy is needed as the considerations for residential moorings are different to other types of development and therefore it is necessary to maintain the quality of the river environment and safeguard local amenity.

Further Work and Next Steps

Although the Councils have commissioned RRR Consultancy to undertake an Accommodation Needs Assessment (ANA) of Gypsies, Travellers, Travelling Showmen and Bargee Travellers and other Caravan and Houseboat Dwellers in the Cambridge Sub-Region Housing Market Area, this study has not yet been completed as the coronavirus pandemic has delayed the completion of the face-to-face survey elements of the assessment. The study is expected at the end of 2021. Therefore, as part of the preparation of the draft version of the Greater Cambridge Local Plan, the Councils will consider and respond to the findings of the study.

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

17.H/RC Residential Caravans

Issue the Plan is Seeking to Respond to

National legislation requires local authorities to carry out an assessment of the accommodation needs of all people residing in or resorting to their area in caravans. This is separate to the assessment of the accommodation needs of Gypsies and Travellers.

Policy Context

National Context

The [Housing and Planning Act 2016](#) (by amending the Housing Act 1985) requires local authorities to carry out an assessment of the accommodation needs of all people residing in or resorting to their area in caravans. This is separate to the assessment of the accommodation needs of Gypsies and Travellers.

In March 2016, the government published [draft guidance](#) for local authorities on reviewing the housing needs for sites for residential caravans within their area.

The [National Planning Policy Framework](#) (NPPF 2021) sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations. Paragraph 62 of the NPPF 2021 also requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023 and Annexes 1-8: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) sets out that South Cambridgeshire District Council is keen to understand the role that existing mobile home parks play in the district to meet the accommodation needs of older people, and whether this type of accommodation should be supported in the future mix of homes provided.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) and the adopted South Cambridgeshire Local Plan (September 2018) do not include specific policies for use when considering proposals for new residential caravan sites / mobile home parks.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils have a duty to assess the housing needs of those residing in caravans.

Overall, the comments received supported the creation of balanced and integrated communities by providing a mix of housing types, sizes, tenures, ownership and management that reflect the findings of the Councils evidence of housing needs of specific groups. No responses specifically mentioned caravan sites or mobile home parks.

Evidence Base

The Councils, along with other neighbouring local authorities, have commissioned RRR Consultancy to undertake an Accommodation Needs Assessment (ANA) of Gypsies, Travellers, Travelling Showmen and Bargee Travellers and other Caravan and Houseboat Dwellers in the Cambridge Sub-Region Housing Market Area. It had been anticipated that the ANA would have been completed in time to inform the First Proposals version of the Greater Cambridge Local Plan, however the coronavirus pandemic has delayed the completion of the face-to-face survey elements of the assessment such that it is now not expected until the end of 2021.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

The Local Plan will consider the need for residential caravan sites and/or mobile home parks, and set out that any proposals for these uses will be considered against the policies applicable to residential developments. However, make clear that the proposed approaches for affordable housing (see H/AH above) and residential space standards and accessible homes (see H/SS above) do not apply to residential caravan sites / mobile home parks.

Reasons for the proposed policy direction

National planning policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. National legislation requires local authorities to carry out an assessment of the accommodation needs of all people residing in or resorting to their area in caravans.

The Local Plan therefore needs to set out how the Councils will respond to the need identified and how proposals for residential caravan sites will be considered.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

To include a specific criteria based policy for new residential caravan sites / mobile home parks with additional flexibility. Not considered a reasonable alternative as the considerations for residential caravan sites / mobile home parks are not sufficiently different to other residential developments.

Further Work and Next Steps

Although the Councils have commissioned RRR Consultancy to undertake an Accommodation Needs Assessment (ANA) of Gypsies, Travellers, Travelling Showmen and Bargee Travellers and other Caravan and Houseboat Dwellers in the Cambridge Sub-Region Housing Market Area, this study has not yet been completed as the coronavirus pandemic has delayed the completion of the face-to-face survey elements of the assessment. The study is expected at the end of 2021. Therefore, as part of the preparation of the draft version of the Greater Cambridge Local Plan, the Councils will consider and respond to the findings of the study.

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

18.H/GT Gypsy and Traveller and Travelling Showpeople sites

Issue the Plan is Seeking to Respond to

The Local Plan needs to identify and respond to housing needs in the area, and this includes the accommodation needs of Gypsies and Travellers and Travelling Showpeople who have needs for specific kinds of site.

Policy Context

National Context

The [National Planning Policy Framework](#) (NPPF 2021) states that the needs of groups with specific housing requirements must be addressed and this includes the needs of travellers. Further national policy guidance is provided in the government's [Planning policy for traveller sites](#) (PPTS). This guidance was updated in 2015 when, significantly, the definition of travellers was changed to exclude people who have permanently ceased to travel.

The PPTS guidance sets out that criteria should be set to guide land supply allocations where there is identified need that cannot be met on existing sites.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) sets out that a key priority for South Cambridgeshire District Council is to identify new sites to accommodate those that wish to live in a caravan. It recognises that although the Gypsy and Traveller Accommodation Needs Assessment 2016 did not identify any need for Gypsy and Traveller sites for those meeting the planning definition, it did show a need to provide sites for those residing in caravans who no longer travel, as well as pitches to accommodate Travelling Showpeople. The housing strategy also sets out that as part of identifying new sites, South Cambridgeshire District Council will look at how they can best accommodate those stopping temporarily in the district.

Adopted Local Plans

The Inspector's Report on the South Cambridgeshire Local Plan 2018 concluded that:

“The Plan makes adequate provision for gypsies and travellers and travelling showpeople who have been identified as meeting the current PPTS definition. However, the Council has not yet completed the review, required under the Housing Act (as amended) which is not limited to those meeting the PPTS

definition. For the reasons given above, we have concluded that this matter should be addressed through the review of the Plan.”

Given the lack of need identified in Cambridge the same inspector also recommended that policies related to the traveller community in the city be reviewed as part of the wider review of the local plan and based upon a more up to date assessment of need.

Both adopted Local Plans include planning policies for Gypsy and Traveller pitches and Travelling Showpeople plots. The Cambridge Local Plan 2018 includes a criteria based policy for the consideration of new pitches or plots on unallocated sites, including their design. The South Cambridgeshire Local Plan 2018 includes a policy for gypsy and traveller pitches to be provided at new communities if a need is identified, a criteria based policy for the consideration of new pitches on unallocated sites, and a policy for the design of new Gypsy and Traveller pitches and Travelling Showpeople plots.

Consultation and Engagement

First Conversation responses emphasized the importance of wide ranging consultation which covers the gypsy & traveller community, the wider community and neighbouring authorities and a sound evidence base to understand needs. There was support for the allocation of sites. Suggestions included locations around Cambridge, including Cambridge North Station, to improve access to services and facilities. There were also calls to improve the quality of sites by providing more services on site. There was support for a dispersed approach rather than one large site, and more transit sites. It was suggested that: local authorities review their own land holdings for potential sites; the securing of planning permission be made easier; and, that family run sites be supported with tenants also given some form of Right to Buy.

Evidence Base

South Cambridgeshire has a significant Gypsy and Traveller community. The 2011 Census of Population estimated the Gypsy and Traveller population at 485 (0.33% of total population). This was considerably higher than the average for England & Wales of 0.10%. There were a further 109 members of the Gypsy and Traveller community living in Cambridge (0.09% of Cambridge population). These are likely to be under-estimates as more recent data reveals that in 2020 there were over 350 Gypsy and Traveller pitches in South Cambridgeshire. The majority of sites are privately managed with only two publicly managed sites, including 32 pitches, in South Cambridgeshire. There are no sites in Cambridge.

There have been 132 Gypsy and Traveller pitches granted planning permission since 2011, all in South Cambridgeshire. However, there are currently no planning

permissions in place for transit sites. Permission was also granted for an additional 10 plots at an existing yard for Travelling show people.

Cambridge City Council and South Cambridgeshire District Council together with six other local authorities have commissioned an 'Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showmen and Bargee Travellers and other Caravan and Houseboat Dwellers in the Cambridge Sub-region Housing Market Area'. This study has been delayed due to coronavirus social distancing restrictions impacting on survey work, such that it is now not expected until the end of 2021.

The study will update the previous assessment which was published in October 2016 and is considered out of date. It will also attempt to address some of the issues faced by the previous study. In particular, the 2016 study identified a high level of 'unknown need' partly due to an inability to engage directly with large parts of the Gypsy and Traveller community.

The new assessment will break down the level of need into various components including those where the nature of need is unknown, those who have stopped travelling permanently and temporary need.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

The Local Plan will respond to the need for new pitches for Gypsies and Travellers and plots for Travelling Showpeople, which are currently being explored through an updated needs assessment.

Subject to the needs identified, this is likely to be addressed through a combination of requiring provision from large scale new communities and significant major development sites, stand alone allocations, and the inclusion of a policy to enable windfalls in suitable locations.

National planning policy requires that criteria should be set to guide land supply allocations where there is identified need that cannot be met on existing sites. The following criteria are proposed:

- Sites are capable of providing an appropriate environment for residents in terms of health, safety, and living conditions, sufficient space for accommodating and moving caravans and vehicles, safe vehicle and pedestrian access, and are capable of being provided with essential utilities.
- The number and nature of pitches or plots provided is appropriate to the site size and the location, and would not have unacceptable adverse impacts on the

amenity of surrounding land uses, the countryside and landscape character, settlement character, heritage or biodiversity interests, rights of way, or from traffic generated, including taking account of cumulative impacts.

- The needs of residents of the site can be met appropriately by local facilities and services without placing undue pressure on them, and the scale of such sites does not dominate the nearest settled community, including considering cumulative impacts with other sites.
- The site is located within a reasonable distance of local facilities and services including schools and health facilities.
- Traveller sites are inappropriate development in the Green Belt. Any proposals in the Green Belt would have to comply with national policy regarding development in the Green Belt.

A design focused policy will also be included in the Local Plan, to ensure sites are built to an appropriate quality to meet the needs of future residents.

The Local Plan will continue to safeguard existing sites.

Reasons for the proposed policy direction

The proposed approach responds to the requirements of the Planning Policy for Traveller Sites (PPTS). It requires local planning authorities to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople, and to set requirements to address this. In partnership with other Councils in Cambridgeshire and parts of Norfolk and Suffolk a new accommodation needs assessment has been commissioned and is underway. However, it has been delayed significantly by the Covid19 pandemic. Through this process we are seeking to engage effectively with traveller communities, their representatives, and other stakeholders, to understand the number of permanent residential pitches required for Gypsies and Travellers and the number of permanent plots for Travelling Showpeople that are needed. It has not been possible to complete this survey in time to inform this consultation. It will be available at the next stage of plan making and will be used to inform the draft local plan and what provision is required.

Some Gypsies and Travellers have ceased to travel and therefore no longer meet the PPTS definition for the purposes of planning. As well as those who meet the definition, the needs assessment will seek to identify the needs of Gypsies and Travellers that no longer travel, as part of the requirement under the Housing Act to consider the needs of people living on sites on which caravans can be stationed. This potential need was one of the issues highlighted by the Inspector examining the 2018 Local Plans to be addressed through this local plan review, and the plan will need to identify how this need will be addressed.

Sites for Travelling Showpeople need to be suitable for the storage, maintenance and testing of items of mobile equipment. There are two existing sites in Greater Cambridge. The South Cambridgeshire Local Plan 2018 identified a modest level of need for further plots. The updated needs assessment will provide an opportunity to get an up to date position regarding need.

National planning policy requires that criteria should be set to guide land supply allocations where there is identified need that cannot be met on existing sites. Issues of sustainability apply to Gypsy and Traveller and Travelling Showpeople sites, emphasised by government policy. National planning guidance also requires that local planning authorities very strictly limit new traveller site development in open countryside that is away from existing settlements. The criteria proposed seeks to reflect national planning guidance, and to provide sufficient flexibility to enable sites to be located in suitable locations.

If need is identified, major developments provide an opportunity to deliver pitches as part of mainstream development, ensuring they meet the needs of all sectors of the community, in sustainable locations close to services and facilities, where sites can be planned into the developments.

To ensure that the levels of Gypsy and Traveller and Travelling Showpeople accommodation are maintained, sites are safeguarded to meet the continuing housing needs of these communities. Safeguarding will ensure that sites are not lost to competing uses.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

No policy. Not considered a reasonable alternative as plans are required to include policies and address needs.

Further Work and Next Steps

The 'Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showmen and Bargee Travellers and other Caravan and Houseboat Dwellers in the Cambridge Sub-region Housing Market Area' will be completed. This will inform the scale and nature of provision needed.

The First Proposals consultation provides another opportunity for potential sites to be suggested for consideration through the local plan process.

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

19.H/CH Community led housing

Issue the Plan is Seeking to Respond to

Community-led housing is where local people and community groups work together to design and deliver new housing, and there are a range of delivery models. There are a number of community led housing groups operating in Greater Cambridge. Some Councils allow community led housing proposals to be considered as exceptions to planning policy, and therefore the Local Plan needs to be clear how any proposals for community-led housing in Greater Cambridge will be considered.

Policy Context

National Context

There is no specific national planning policy or guidance on the approach that should be taken for community-led housing.

Community-led housing is a way of delivering self-contained homes through different delivery models such as:

- **Community Land Trusts** – these are developments that provide affordable homes, but where the Trust acts a long term steward of the housing, ensuring that it remains affordable in perpetuity.
- **Co-housing** – these developments provide homes for each of their residents, as well as shared and community spaces. They usually have a common house with shared facilities for cooking and dining, meeting and play areas, and guest rooms. They will often manage themselves and come together to make decisions.
- **Co-operatives** – these are developments that provide homes for each of their residents, but where a mutual society made up of the residents owns or leases the homes collectively and then each resident pays rent for their home. The residents therefore act as their own landlord.

Regional / Local Context

The [Greater Cambridge Housing Strategy 2019-2023 and Annexes 1-8: Homes for Our Future](#) (Cambridge City Council and South Cambridgeshire District Council, April 2019) sets out that the Councils are keen to explore new ways of delivering different types of housing, such as community-led developments including co-operative housing and Community Land Trusts.

Adopted Local Plans

The adopted Cambridge Local Plan (October 2018) and the adopted South Cambridgeshire Local Plan (September 2018) do not include specific policies for use when considering proposals for community-led housing.

Consultation and Engagement

The 'First Conversation' consultation set out that the Councils will consider other models of housing such as community led development including co-operative housing.

Overall, the comments received supported the creation of balanced and integrated communities by providing a mix of housing types, sizes, tenures, ownership and management that reflect the findings of the Councils evidence of housing needs of specific groups. This included support for co-housing and co-operative opportunities, as part of making housing more widely accessible.

Evidence Base

The Councils are aware that there are a number of Community Land Trusts in Cambridge and South Cambridgeshire looking to bring forward developments.

[Marmalade Lane](#) at Orchard Park is an example of a co-housing development that has been completed in Greater Cambridge.

Proposed Policy Approach and Reasons

The Proposed Policy Direction

The proposed approach, as set out in the First Proposals report is as follows:

Recognise that community led housing developments will be brought forward within Greater Cambridge, and set out that any proposals for these uses will be considered against the policies applicable to residential developments. Rural exception sites for affordable housing (see H/ES above) and self and custom build homes (see H/CB) are examples of developments that can be brought forward as community led housing developments.

Reasons for the proposed policy direction

There is no specific national planning policy or guidance on community led housing, however, there are community groups in Greater Cambridge looking to bring forward developments. The Local Plan therefore needs to be clear how these proposals will be considered.

Alternative approaches, and reasons why they were rejected

Alternative approaches considered were:

1. To include a specific criteria based policy for community led housing - Not considered a reasonable alternative as community led housing is a way of delivering housing developments, and therefore the considerations for these housing developments are no different to other residential developments.
2. To allow the development of community led housing generally as an exception to policy - This is not the preferred approach as likely to hamper the delivery of rural exception sites for affordable housing.

Further Work and Next Steps

Taking account of feedback received, the next step would be the inclusion of a fully worked up policy in the draft Local Plan for consultation at the next stage of plan making.

Appendix 1: First Conversation Feedback

This section of the topic paper provides a summary of the feedback from the First Conversation related to this theme, and how comments have been taken into account. A report on the consultation, and full details of the comments received can be found on the [Greater Cambridge Planning website](#).

Q31 How should the Local Plan help to meet our needs for the amount and types of new homes?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Objection to growth in the new Local Plan	Do not support new development.	Noted. The Councils are required to calculate their housing need based on the national standard method and plan for this growth, unless exceptional circumstances justify an alternative approach taking account of demographic trends and market signals. There is a housing need in Greater Cambridge and therefore the Councils must plan for growth.
Objection to growth in the new Local Plan	Support new development in the north of England instead of Greater Cambridge.	Noted. The Councils are required to calculate their housing need based on the national standard method and plan for this growth, unless exceptional circumstances justify an alternative approach taking account of demographic trends and market signals. There is a housing need in Greater Cambridge and therefore the Councils must plan for growth.
Objection to growth in the new Local Plan	Do not plan for economic growth.	Noted. However, national planning policy requires local plans to support economic growth and productivity. The continuing strength of the Greater Cambridge economy and its national importance provides justification for continuing to support economic growth in Greater Cambridge.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Objection to growth in the new Local Plan	Reduce employment growth.	Noted. However, national planning policy requires local plans to support economic growth and productivity. The continuing strength of the Greater Cambridge economy and its national importance provides justification for continuing to support economic growth in Greater Cambridge.
Growth strategy	Coordinate housing and economic growth to reduce commutes.	Noted. The preferred housing and jobs requirements have been developed taking account of the relationship between jobs growth and housing needs. The preferred development strategy is for homes and jobs to be located close to each other or accessible by sustainable modes of transport. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.
Growth strategy	Allocate a sufficient variety of land throughout the plan period and across the plan area.	Noted. A wide range of developers have put forward sites for consideration through the Call for Sites, and the Councils preferred development strategy includes a mix of sites from small sites in villages to strategic extensions to Cambridge and Cambourne. This mix of sites will deliver throughout the plan period.
Growth strategy	Allocate a minimum 10% of small and medium sites, including in rural areas.	Noted. It is anticipated that the housing requirement will be met by a variety of sizes of sites, including smaller sites that will account for in excess of 10% of the housing requirement.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Growth strategy	Support development of strategic, large, medium and small sites.	Noted. A wide range of developers have put forward sites for consideration through the Call for Sites, and the Councils preferred development strategy includes a mix of sites from small sites in villages to strategic extensions to Cambridge and Cambourne. This mix of sites will deliver throughout the plan period.
Growth strategy	Support development along transport corridors, including the East-West rail line, around key settlements, in rural locations, in the Green Belt, densification, on brownfield sites, in villages and towns and on and on the edge of Cambridge.	Noted. The Local Plan sets out a preferred development strategy that focusses new development in sustainable locations, near to employment sites and sustainable transport options. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.
Growth strategy	Support development in sustainable locations.	Noted. The Local Plan sets out a preferred development strategy that focusses new development in sustainable locations, near to employment sites and sustainable transport options. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Growth strategy	Support new villages, new towns.	Noted. The Councils preferred development strategy includes a mix of sites from small sites in villages to strategic extensions to Cambridge and Cambourne. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.
Growth strategy	Support a flexible growth strategy, able to accommodate new sites coming forward during the plan period.	Noted. The Greater Cambridge Local Plan will continue to allow windfall sites (sites not allocated) to come forward during the plan period within Cambridge and the villages.
Growth strategy	Work with SMEs to deliver small sites.	Noted. A wide range of developers have put forward sites for consideration through the Call for Sites, and the Councils preferred development strategy includes a mix of sites from small sites in villages to strategic extensions to Cambridge and Cambourne.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Growth strategy	Do not support development of gardens, green space, countryside and Green Belt release.	Noted. The Local Plan sets out a preferred development strategy that focusses new development in sustainable locations, near to employment sites and sustainable transport options. Some land within the Green Belt is proposed for new development where this can be justified by exceptional circumstances. The Greater Cambridge Local Plan includes preferred approaches that limit the types of developments that will be allowed in the countryside, set out when the development of gardens is acceptable, and protect green spaces.
Growth strategy	Do not support high density development.	Noted. National planning policy requires plans to support making efficient use of land, and sets out that locations served by public transport provide opportunities for higher density developments. The preferred approach is therefore to apply a design led approach to determining the capacity of sites so that best use is made of land.
Growth strategy	Do not support development in villages.	Noted. Our evidence shows that our villages should play only a limited role in meeting future development needs, however some growth is necessary to retain the vitality of our villages.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Growth strategy	Consider housing and employment need of neighbouring authorities where development is near the Greater Cambridge border.	Noted. Through the Duty to Co-operate the Councils are engaging with neighbouring authorities and other organisations.
Growth strategy	Assess the impact of higher levels of growth, including on local and strategic infrastructure.	Noted. The Councils have tested the impacts of varying housing and jobs growth level options on different considerations, such as infrastructure. More information is included in the Strategy Topic Paper.
Delivering more housing	Support co-operative housing.	Noted. The Councils have set out a preferred approach for community led housing and co-housing developments, that allows for these developments where they are consistent with residential planning policies.
Delivering more housing	Convert closed business use buildings to housing.	Noted. Permitted development rights allow some existing redundant employment buildings to be converted to housing. The Greater Cambridge Local Plan in its Great Places, Jobs and Homes themes will include a suite of policies setting out the types of development that are appropriate in different locations.
Delivering more housing	Convert existing large properties into micro apartments and extend existing properties.	Noted. The Councils have set out a preferred approach for the sub-division of existing plots that takes account of a range of factors including harm to local character, open space, heritage, biodiversity and trees.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Delivering more housing	Do not support subdivision of family homes.	Noted. The Councils have set out a preferred approach for the subdivision of existing plots that takes account of a range of factors including harm to local character, open space, heritage, biodiversity and trees.
Housing need and requirement	Meet housing needs for older people, students, key and essential workers, care leavers, ex-service personnel, specialist needs.	Noted. The Councils have commissioned evidence to understand the housing needs of different groups, and this has been used to inform the preferred approach for the Greater Cambridge Local Plan. Policies are included that cover a wide range of housing needs.
Housing need and requirement	Ensure sufficient houses are delivered to facilitate home ownership and prioritise long-time residents of Cambridge.	Noted. The Councils have commissioned evidence to understand the housing needs of different groups, and this has been used to inform the preferred approach for the Greater Cambridge Local Plan. This has included considering the need for affordable homeownership, as well as market homes, homes for rent, and affordable homes.
Housing need and requirement	Support communities through the new Local Plan to meet their own housing need.	Noted. The Greater Cambridge Local Plan will allow individuals or groups to bring forward self and custom build homes or community led housing developments.
Housing need and requirement	Publish housing need figures.	Noted. The Greater Cambridge Local Plan sets out the housing need for the area.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Housing need and requirement	Use the standard method to calculate the minimum local housing need, and adjust the figure for the growth strategy, identified strategic infrastructure improvements and meeting affordable housing needs.	Noted. The preferred housing and jobs requirements have been developed taking account of the relationship between jobs growth and housing needs. The Councils have calculated their housing need based on the standard method but also based on alternative scenarios taking account of anticipated economic growth in the area. The preferred approach is to plan for higher levels of economic growth and the housing growth associated with that level of jobs. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.
Housing need and requirement	Plan for the standard method.	Noted. The Councils have considered their housing and jobs requirements based on the standard method, however, given the likely higher levels of jobs growth, the preferred approach is to plan for higher jobs and housing growth than the standard method. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Housing need and requirement	Plan for 66,700 dwellings over the plan period.	Noted. The Councils have considered their housing and jobs requirements based on the standard method, however, given the likely higher levels of jobs growth, the preferred approach is to plan for higher jobs and housing growth than the standard method. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.
Housing need and requirement	Base the housing requirement on need instead of demand.	Noted, evidence informing the local plan focuses on the need for new housing.
Housing need and requirement	Plan for higher levels of growth, above the standard method.	Noted. The Councils have considered their housing and jobs requirements based on the standard method, however, given the likely higher levels of jobs growth, the preferred approach is to plan for higher jobs and housing growth than the standard method. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.
Gypsy and Traveller site needs	Meet needs for Gypsy and Traveller communities.	Noted. The preferred approach is that the Greater Cambridge Local Plan will seek to meet identified needs. A new needs assessment is underway and expected to report at the end of 2021, as face to face surveys have been delayed by the impacts of the COVID-19 pandemic.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Gypsy and Traveller site needs	Increase G&T plot availability with easier planning permission.	Noted. The preferred approach is for the Greater Cambridge Local Plan to safeguard existing sites and respond to the need for new sites by seeking provision within large scale new communities and significant major development sites, stand alone allocations, and the inclusion of a policy to enable windfalls in suitable locations.
Gypsy and Traveller site needs	Ensure G&T sites have proper facilities.	Noted. The preferred approach is that the Greater Cambridge Local Plan will include a design focused policy to ensure sites are built to an appropriate quality to meet the needs of future residents.
Gypsy and Traveller site needs	Facilitate access to lawyers with expertise for Travellers.	Noted, however this is beyond the scope of the Local Plan.
Housing types	Build and 1 and 2 bed homes.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types and sizes in all new developments. The proposed approach for individual policy areas are guided by evidence of housing needs of specific groups.
Housing types	Build family sized homes.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types and sizes in all new developments. The proposed approach for individual policy areas are guided by evidence of housing needs of specific groups.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Housing types	Build homes for downsizing and bungalows.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types and sizes in all new developments. The proposed approach for individual policy areas are guided by evidence of housing needs of specific groups.
Housing types	Build tiny homes.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types and sizes in all new developments. The proposed approach for individual policy areas are guided by evidence of housing needs of specific groups.
Housing types	Provide a range of housing types, tenures and sizes, and mixed housing developments.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments. The proposed approach for individual policy areas are guided by evidence of housing needs of specific groups.
Housing types	Require a higher proportion of starter homes.	Noted. The Councils preferred approach is for the provision of at least 25% First Homes as set out in national planning guidance, and for a mix of other affordable housing tenures that take into account the issues of affordability experienced in Greater Cambridge and also viability.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Housing types	Provide self-build plots, Build to Rent, cohousing, sheltered housing and lifetime homes.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments. The proposed approach for individual policy areas are guided by evidence of housing needs of specific groups. The Greater Cambridge Local Plan includes policies for self build, Build to Rent, community led housing, specialist housing, and accessible and adaptable homes.
Housing types	Provide key worker housing in all large-scale new development.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments. The proposed approach for securing affordable housing is to seek a mix of affordable housing tenures that take into account the issues of affordability experienced in Greater Cambridge and also viability.
Affordable housing	Meet affordable housing need, at 40% of proposals.	Noted. The Councils preferred approach is to seek 40% affordable housing on all developments of 10 or more dwellings. The Councils have evidence of need for affordable housing, however they need to ensure that collectively all the requirements on new developments do not make schemes unviable. It is also important that within the affordable homes secured, a mix of tenures can be provided.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Affordable housing	Require a higher proportion of affordable homes.	Noted. The Councils preferred approach is to seek 40% affordable housing on all developments of 10 or more dwellings. The Councils have evidence of need for affordable housing, however they need to ensure that collectively all the requirements on new developments do not make schemes unviable. It is also important that within the affordable homes secured, a mix of tenures can be provided.
Affordable housing	Work with central government to maximise Council owned new housing for affordable tenure.	Noted, however, this is beyond the scope of the new Local Plan.
Affordable housing	Stop right to buy or sell the properties back to Councils.	Noted, however, this is beyond the scope of the new Local Plan.
Affordable housing	Provide more council housing at social rents.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments. The proposed approach for securing affordable housing is to seek a mix of affordable housing tenures that take into account the issues of affordability experienced in Greater Cambridge and also viability.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Affordable housing	Provide affordable housing in South Cambridgeshire for residents with local connections.	Noted. The Councils preferred approach for new housing is to seek to create balanced and mixed communities, this includes homes for local workers. Local Lettings Plans for new affordable homes can prioritise local workers. Affordable housing developments can also prioritise those with local connections.
Affordable housing	Situate and integrate affordable housing sensitively.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments. The proposed approach for affordable housing sets out guidance on the clustering and distribution of affordable homes within new developments.
Affordable housing	Build affordable housing in wealthier neighbourhoods.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments. The proposed approach for affordable housing sets out guidance on the clustering and distribution of affordable homes within new developments.
Evidence base	The new Local Plan should be informed by a robust evidence base.	Noted. The Councils, along with neighbouring Councils, commissioned a housing needs of specific groups study, and this evidence base study has been used to inform the preferred approaches for the Local Plan.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Transport	Develop the infrastructure for battery powered travel.	Noted. As set out in the Infrastructure theme, the preferred approach for the Local Plan is to require new developments to provide electric vehicle charging infrastructure. More info
Transport	Support car sharing.	Noted, the infrastructure theme includes policies regarding transport.
Transport	Provide high-quality and connected sustainable transport.	Noted. The provision of public transport is outside of the scope of the Local Plan, however, the preferred development strategy is to locate new development close to existing and proposed high quality public transport routes. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.
Transport	New development should be connected to sustainable and public transport links.	Noted. The preferred development strategy is to locate new development close to existing and proposed high quality public transport routes. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.
Transport	New development should not depend on cars.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Infrastructure	Infrastructure should be in place on occupation.	Noted. The Councils preferred approach is included in the Infrastructure chapter of the Preferred Options Local Plan, and the preferred approach is to only permit development if there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the new development, at the time when they are needed.
Infrastructure	Include a policy requiring developers to meet agreed contributions.	Noted. The Councils preferred approach is included in the Infrastructure chapter of the Preferred Options Local Plan, and the preferred approach is to only permit development if there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the new development, at the time when they are needed. Developers will be required to deliver infrastructure directly, or contribute through planning obligations, community infrastructure levy or its successor.
Infrastructure	Address water supply before proceeding with new development.	Noted. The Preferred Options Local Plan sets out the Councils response to the water supply issues. Information is included in the

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Policy recommendations	Include policies on minimum room sizes, indoor light levels, outdoor space and minimising overcrowding.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan. Policies within the Homes chapter of the preferred options Local Plan include requiring new homes to meet residential space standards and have access to outdoor space.
Policy recommendations	Include a policy requiring living space in HMOs.	Noted. The preferred approach is for HMOs to meet the residential space standards and licensing standards relating to space standards.
Policy recommendations	Adopt the recommendations of the Building Better, Building Beautiful Commission.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.
Policy recommendations	Include policies supporting university development.	Noted. The Councils have set out a preferred approach for a criteria based policy for use when considering proposals for student accommodation.
Policy recommendations	Include a policy requiring landlords to maintain high quality rental properties.	Noted. This is beyond the scope of the Local Plan, however, the Councils preferred approach for new housing developments is to secure high quality design, with individual homes meeting indoor space standards and having access to outdoor space.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Policy recommendations	A proportion of land in new developments should be allocated to Community Land Trusts.	Noted. The Councils have set out a preferred approach for community led housing and co-housing developments, that can include Community Land Trusts, that allows for these developments where they are consistent with residential planning policies. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments.
Design	Support high quality design in new development, including insulation.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan and the Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings and designing buildings to take account of climate change.
Design	New development should be accessible to wheelchair users.	Noted. The preferred options Local Plan includes a requirement for new homes to be accessible and adaptable, including for wheelchair users.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Design	Support prefab design.	Noted. The Councils have not set out specific requirements for the construction methods of new homes, and therefore prefab homes, or other methods of construction could be used by developers provided that the overall design of the new home is consistent with other policies within the Local Plan.
Climate change mitigation and adaptation	New development should be low or zero carbon and energy efficient.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Climate change mitigation and adaptation	Include policies which require housing to cope with colder winters and hotter summers.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding designing buildings to take account of climate change.
Climate change mitigation and adaptation	Support living roofs.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding designing buildings to take account of climate change, and this includes supporting the inclusion of green roofs.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Climate change mitigation and adaptation	Support solar energy production in new development.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Climate change mitigation and adaptation	Support renewable heating of new development.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Climate change mitigation and adaptation	Support rainwater catchment systems and grey water use in new development.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding water efficiency of new buildings.
Climate change mitigation and adaptation	Use natural materials in building construction instead of carbon intensive materials.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Climate change mitigation and adaptation	Only permit proposals for large-scale homes where they meet high sustainability standards.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Climate change mitigation and adaptation	Include a policy requiring minimum clean energy standards.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Green infrastructure and biodiversity	Provide biodiverse green spaces and allotments for new development.	Noted. The preferred options document sets out a preferred approach for the provision of open space within new developments. More detail is included in the Biodiversity and Green Spaces chapter of the Local Plan and accompanying Topic Paper.
Green infrastructure and biodiversity	New development should avoid harm to the environment and mitigate impact where necessary.	Noted. The preferred options document sets out policies for the delivery of new developments that enhance biodiversity, and also control impacts from new developments. More detail is included in the Biodiversity and Green Spaces chapter of the Local Plan and accompanying Topic Paper.
Green infrastructure and biodiversity	Support tree and hedge planting in new development.	Noted. The preferred options document sets out policies for the delivery of new developments that enhance biodiversity. More detail is included in the Biodiversity and Green Spaces chapter of the Local Plan and accompanying Topic Paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Miscellaneous	Increase residential moorings along the River Cam.	Noted. An accommodation needs assessment is being carried out which will assess the needs of house boat dwellers. The coronavirus pandemic has delayed the completion of the face-to-face survey elements of this assessment, such that it has not been possible to complete this assessment in time to inform this consultation. It will be available at the next stage of plan making, and will be used to inform the draft Local Plan, including whether any allocations are needed.
Miscellaneous	Limit speculative investment, ownership from overseas investors, AirBnB, student housing, aparthotels, second homes, rental properties and short term let properties.	Noted. It is beyond the scope of the Local Plan to control the sale of new homes or the renting of new homes, except where they are affordable homes and the Councils are involved in the letting process. The Local Plan includes in the Jobs and Homes chapters preferred approaches relating to new developments of student accommodation, Build to Rent developments, and visitor accommodation.
Miscellaneous	Regulate rental fees.	Noted. This is beyond the scope of the new Local Plan.

Q33 What kind of housing do you think we should provide?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Site allocations in the new Local Plan	Allocate specific sites for specialist accommodation, and in proximity to existing homes, public transport, and medical and community facilities, within the new Local Plan.	Noted. The Councils evidence of housing needs of specific groups have provided recommendations relating to the provision of specialist housing and homes for older people. The Councils preferred approaches for different types of housing are guided by the recommendations from this evidence, and for specialist housing includes a requirement for provision of specialist housing as part of the housing mix of new developments, particularly at new settlements and within urban extensions. Further evidence on the provision of specialist housing is being prepared.
Site allocations in the new Local Plan	Allocate sites in sustainable locations, near employment sites and sustainable transport options linked to Cambridge.	Noted. The Local Plan sets out a preferred development strategy that focusses new development in sustainable locations, near to employment sites and sustainable transport options. More information is included in the Development Strategy section of the Local Plan and the Strategy Topic Paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Site allocations in the new Local Plan	Needs to be sufficient residential moorings allocated.	Noted. An accommodation needs assessment is being carried out which will assess the needs of house boat dwellers. The coronavirus pandemic has delayed the completion of the face-to-face survey elements of this assessment, such that it has not been possible to complete this assessment in time to inform this consultation. It will be available at the next stage of plan making, and will be used to inform the draft Local Plan, including whether any allocations are needed.
Site allocations in the new Local Plan	Allocate sites for Build to Rent	Noted. A preferred approach for Build to Rent developments is set out for the Local Plan. This is for a criteria based policy for use when considering Build to Rent developments. Build to Rent can be provided within allocated sites, provided that the proposal is consistent with the Councils preferred approach.
Site allocations in the new Local Plan	Allocate sites capable of delivering policy compliant levels of affordable housing and self-build plots.	Noted. The Councils Viability Assessment has considered whether all the requirements set out in the preferred options Local Plan can be sought without making developments unviable, and the viability evidence will be refined at future stages of plan making.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Site allocations in the new Local Plan	Engage with a range of developers, including SMEs.	Noted. A wide range of developers have put forward sites for consideration through the Call for Sites, and the Councils preferred development strategy includes a mix of sites from small sites in villages to strategic extensions to Cambridge and Cambourne.
General policy recommendations	Support the integration of people with disabilities in communities and mixed-aged developments.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments.
General policy recommendations	Provide accessible and adaptable housing / 'Life-Time' homes.	Noted. The Lifetime Homes standard has been replaced by the optional standards for accessible and adaptable homes. The Councils preferred approach sets out a requirement for all homes to meet the M4(2) Building Regulations standard for accessible and adaptable homes.
General policy recommendations	Support community-led building projects and organisations, and co-housing developments.	Noted. The Councils have set out a preferred approach for community led housing and co-housing developments, that allows for these developments where they are consistent with residential planning policies.
General policy recommendations	Support different methods of construction.	Noted. The Councils preferred approaches for new homes allow for different methods of construction to be used provided that they deliver the requirements set out.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General policy recommendations	Policies should be flexible to ensure viability of development. Should not be overly prescriptive.	Noted. The Councils preferred approaches for each of their housing policies include flexibility to allow for changing circumstances over the plan period. The Councils Viability Assessment has tested the viability of requiring all the Councils preferred approaches on a range of developments.
General policy recommendations	New development should deliver 40% affordable housing.	Noted. The Councils preferred approach is to seek 40% affordable housing on all developments of 10 or more dwellings. The Councils have evidence of need for affordable housing, however they need to ensure that collectively all the requirements on new developments do not make schemes unviable. It is also important that within the affordable homes secured, a mix of tenures can be provided.
General policy recommendations	New development should deliver above 40% affordable housing.	Noted. The Councils preferred approach is to seek 40% affordable housing on all developments of 10 or more dwellings. The Councils have evidence of need for affordable housing, however they need to ensure that collectively all the requirements on new developments do not make schemes unviable. It is also important that within the affordable homes secured, a mix of tenures can be provided.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General policy recommendations	The new Local Plan should be flexible to respond to changing housing needs over the plan period. Should also allow consideration of individual site circumstances and circumstances of the local area to be taken into account, including market conditions.	Noted. The Councils preferred approaches for each of their housing policies include flexibility to allow for changing circumstances over the plan period. Exceptions are included within some preferred approaches to allow for site specific circumstances.
General policy recommendations	Include a policy for the entire plan area on providing essential local worker accommodation or expand the definition of key workers so that essential local workers are eligible for affordable homes.	Noted. The Councils preferred approach for new housing is to seek to create balanced and mixed communities, this includes homes for local workers. Local Lettings Plans for new affordable homes can prioritise local workers.
General policy recommendations	Greater provision should be made for self build. Consider including a self and custom build exceptions policy instead of requiring a proportion from development allocations.	Noted. The Councils have set out a preferred approach for self and custom build that requires its provision specifically on developments of 20 dwellings or more, but also allows for any new homes that would be consistent with policy to be provided as self or custom build homes. Allowing self and custom build homes as exceptions to policy has not been included in the Councils preferred approach as this could impact on the delivery of exception sites for affordable housing.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General policy recommendations	Consider viability of requiring self and custom build and implications if plots not taken up.	Noted. The Councils have set out within the preferred approach for self and custom build homes that if these plots have not been sold as a self or custom build plot after at least 12 months of appropriate marketing they can then be delivered by the developer or others.
General policy recommendations	Ensure adequate provision of executive homes in order to ensure that managerial staff and business owners are retained within the local authority areas. Variety of sites in urban and rural locations should be considered in order to reflect the needs of higher income groups and provide a choice of location across the Greater Cambridge area.	Noted. The Councils preferred approaches for new homes seek to ensure the provision of balanced and mixed communities. Executive homes can be delivered within Greater Cambridge, provided that any proposals are consistent with the policies for residential development.
General policy recommendations	Include a policy supporting the provision of university accommodation.	Noted. The Councils have set out a preferred approach for a criteria based policy for use when considering proposals for student accommodation.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Housing type	Provide more affordable housing, particularly council housing / social housing that is actually affordable.	Noted. The Councils have set out a preferred approach for the affordable housing policy to include a split in the different affordable housing tenures that will be sought, and that this should include an element of social rent homes in recognition that the Councils have been identified by the Government as areas of high affordability pressure.
Housing type	Include a housing mix policy to meet housing needs. Provide homes of a full range of different types, sizes and tenures. Provide housing for key workers, older people, families, HMOs, co-housing and specialist housing.	Noted. The Councils preferred approach is to deliver mixed and balanced communities by seeking a range of housing types, sizes and tenures in all new developments. The proposed approach for individual policy areas are guided by evidence of housing needs of specific groups.
Housing type	Provide more bungalows for older people and disabled people.	Noted. The Councils preferred approach includes encouraging the delivery of a mix of types of homes – houses, flats and bungalows.
Housing type	Establish a housing requirement specifically for the needs of older people. Provide supported living for older people.	Noted. The Councils evidence of housing needs of specific groups have provided recommendations relating to the provision of specialist housing and homes for older people. The Councils preferred approaches for different types of housing are guided by the recommendations from this evidence. Further evidence on the provision of specialist housing is being prepared.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Housing type	Provide small-sized housing / more 1 and 2 bed homes, including bedsits, micro apartments, and housing for students and downsizing.	Noted. The Councils preferred approach for the housing mix to be provided seeks to ensure the delivery of balanced and mixed communities with a range of housing types and sizes, while also responding to its evidence of housing needs of specific groups.
Housing type	Explore other means of making housing more widely accessible, such as through private rented homes. Assess need and demand for purpose built private rented accommodation.	Noted. The Councils have included a preferred approach for Build to Rent developments that support their delivery, while ensuring that communities provide for a variety of housing needs.
Housing type	Provide temporary housing for homeless people.	Noted, although this is outside the scope of the Local Plan. The Councils both have Homelessness Strategies that consider the most appropriate way to respond to homelessness in their areas.
Design	Encourage high-quality design from new development.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.
Design	Support homes designed like hofje's in the Netherlands.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Design	Follow NHS England Health Towns Initiative and apply principles to new developments.	Noted. The Councils preferred approach is for new developments to require health principles to be applied to new developments, drawing on the ten principles developed from the Healthy New Towns initiative.
Climate change mitigation and adaptation	Build sustainable housing. Build homes to passive house standards. Build to highest possible eco-standards	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Evidence base	The new Local Plan should be informed by a robust evidence base.	The Councils, along with neighbouring Councils, commissioned a housing needs of specific groups study, and this evidence base study has been used to inform the preferred approaches for the Local Plan.
Evidence base	Housing mix policies should be informed by an assessment of need.	The Councils, along with neighbouring Councils, commissioned a housing needs of specific groups study, and this evidence base study has been used to inform the preferred approaches for the Local Plan.
Evidence base	Consider the number of empty homes when determining the housing requirement for the new Local Plan.	Noted. Making best use of existing homes is one of the key principles of the Greater Cambridge Housing Strategy.

Q34 How should we meet the need for additional Gypsy, Traveller and caravan sites?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Consultation	Consult with the Gypsy and Traveller (G&T) community to determine their need for new sites.	Noted. Efforts have been made to engage as many people as possible in the production of the Local Plan. Targeted consultation with the gypsy & traveller community has been undertaken through the Gypsy & Traveller Accommodation Needs Assessment.
Consultation	Seek the views of local communities through consultation.	Noted. Efforts have been made to engage as many people as possible in the production of the Local Plan. Targeted consultation with the gypsy & traveller community has been undertaken through the Gypsy & Traveller Accommodation Needs Assessment.
Consultation	Recommend that consultation is undertaken with neighbouring authorities to address need for G&T provision in a strategic manner.	Noted. The Gypsy & Traveller Accommodation Needs Assessment has been jointly commissioned with neighbouring authorities to ensure a strategic approach is taken.
Identification of site allocations	The Council should seek to identify appropriate allocations in areas which are sustainable and provide a good quality of life.	Noted. The Local Plan will seek to identify sites to meet the accommodation needs of gypsies & travellers in line with national planning policy and guidance. Potential sites have been sought through the Call for Sites process and this consultation provides another opportunity to propose suitable sites.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Identification of site allocations	The amount of allocations in the Plan should be informed by a G&T accommodation needs assessment, which should form part of the evidence base for the new Local Plan.	Noted. A gypsy & traveller accommodation needs assessment has been commissioned and will inform the allocation of sites. It will form part of the Local Plan evidence base. However, completion of the study has been delayed due to the practicalities of undertaking fieldwork during the pandemic.
Identification of site allocations	Support for the allocation a G&T sites near Cam North Station.	Noted. Access to services and facilities will be an important consideration in the spatial distribution of allocated sites.
Identification of site allocations	Support for the allocation of G&T sites to meet the needs of the area.	Noted. The Local Plan will seek to meet gypsy & traveller needs in accordance with the Gypsy & Traveller Accommodation Needs Assessment and national planning policy and guidance.
Identification of site allocations	Support the dispersal of site allocations throughout the area, rather allocating a large amount of need in one location.	Noted. Subject to the needs identified, it is proposed to seek to allocate a range of sites spanning large scale new communities, significant major development sites and standalone allocations, alongside the inclusion of a policy to enable windfalls in suitable locations.
Identification of site allocations	Objection to the allocation of caravan sites which do not support the G&T community	Noted. The allocation of caravan sites which do not specifically address the needs of the gypsy & traveller community will be considered when the results of the Gypsy & Traveller Accommodation Needs Assessment are known.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Identification of site allocations	Support for the allocation of more common land to provide G&T sites. Consider reviving the 'green lanes network'.	Noted. Whilst a range of sources of land will be explored, common land is unlikely to be available for development.
Identification of site allocations	Support the allocation of travellers sites in urban locations to ensure good access to services, facilities and employment.	Noted. Access to services and facilities will be an important consideration in the spatial distribution of allocated sites.
Identification of site allocations	Council land should be made available for the allocation of new sites	Noted. A range of potential sources will be explored
Type of sites required	Allocate transit sites, providing a stopping place for 3-6 weeks at a time.	Noted. The Local Plan will seek to allocate transit sites if a need is confirmed by the Gypsy & Traveller Accommodation Needs Assessment.
Type of sites required	Support for family run sites.	Noted.
Type of sites required	Support for sites which provide tenants with the opportunity to buy a plot after 3 years of being on site.	Noted. The future management of sites is beyond the scope of the Local Plan.
Policy recommendations	The Council should seek to meet the accommodation needs of G&T within the authority area.	Noted. The Local Plan will seek to meet gypsy & traveller needs in accordance with the Gypsy & Traveller Accommodation Needs Assessment and national planning policy and guidance.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Housing mix	The new Local Plan should seek to provide a range of housing types to meet the needs of the area.	Noted. The Gypsy & Traveller Accommodation Needs Assessment, when published, will be used to inform the housing mix and help to ensure an appropriate range of house types is provided.
Miscellaneous	The new Local Plan should clearly outline expected growth and delivery rates to inform the provision of associated infrastructure.	Noted. The expected growth and delivery of gypsy & traveller sites will be informed by the Gypsy & Traveller Needs Accommodation Assessment.
Miscellaneous	The Council should seek to improve access to existing G&T sites in north Cambridge	Noted. The Local Plan will include a policy to safeguard existing gypsy & traveller sites. The plan will also include a design focused policy to ensure future sites are built to an appropriate quality to meet the needs of future residents. Access to Chesterton Fen is an issue being explored by the North East Cambridge AAP.
Miscellaneous	Provide support services for travellers at local libraries.	Noted. The provision of support services at local libraries is beyond the scope of the Local Plan.
Miscellaneous	A G&T liaison and support officer at the Council would be helpful	Noted. A gypsy & traveller liaison and support officer is beyond the scope of the Local Plan.

Q35 How should we ensure a high standard of housing is built in our area?

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Design related documents and review panels	Support Design Review Panels. Continue to use existing design workshops. Hold design competitions.	Noted, the Planning service have recently undertaken a review of their design review panels, and continue to recognise their important role.
Design related documents and review panels	Support and produce Design Codes, including local Design Codes, Neighbourhood Plans, Village Design Guides, and Landscape and Townscape Assessments.	Noted, the Councils will be reviewing its approach to design guidance in light of changes to the national planning policy framework.
Design related documents and review panels	Require design codes for sites greater than 200 dwellings or a flexible design code for development schemes delivered in excess of five years.	Noted, the First Proposals include a range of policies regarding design, and design codes will play a role in ensuring high quality design is delivered.
Implementation of planning policy	Implement and enforce standards through planning conditions. Monitor and enforce design in new development.	Noted. All developments are required to be built in accordance with an approved planning permission, and this includes any conditions attached to that permission such as that the development will be built in accordance with the approved detailed plans. New developments are also required to be built in accordance with Building Regulations.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Implementation of planning policy	Ensure planning applications are assessed to ensure high standards of housing. Refuse planning applications which do not meet design standards set out in the new Local Plan.	Noted. All planning applications are considered against national planning policy and local planning policy (including the Local Plan), and a decision is made based on whether the application is in accordance with these policies. Exceptions are only allowed in specific circumstances.
Accessibility standards	Apply accessibility and adaptability standards across the plan area.	Noted. The preferred approach for the Local Plan is to include accessibility and adaptability standards that are consistent across Greater Cambridge. This approach is based on the Councils' evidence of housing need. Exemptions are allowed in specific circumstances.
Accessibility standards	Consider locally specific accessibility standards.	Noted. The preferred approach for the Local Plan is to include accessibility and adaptability standards that are consistent across Greater Cambridge. This approach is based on the Councils' evidence of housing need. Exemptions are allowed in specific circumstances.
Accessibility standards	Allow flexibility for the provision of accessibility standards.	Noted. The preferred approach for the Local Plan is to include accessibility and adaptability standards that are consistent across Greater Cambridge. This approach is based on the Councils' evidence of housing need. Exemptions are allowed in specific circumstances.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Space standards	Allow flexibility for exceptions to space standards in co-living and tiny homes, and provide requirements around shared space.	Noted. The preferred approach for the Local Plan is to allow exceptions where new homes are being provided to meet a specific evidenced need (e.g. accommodation for homeless, disabled or specific young adults) and evidence is provided to demonstrate that meeting this nationally described standard would result in unsuitable homes for the identified occupants.
Space standards	Encourage new development above minimum standards set out in national standards.	Noted. The preferred approach for the Local Plan is for new developments to meet or exceed national space standards.
Space standards	Do not set minimum space standards in the new Local Plan.	Noted. It is important that all new residential developments provide a high standard of amenity for existing and future users, and therefore to secure this the Councils have included specific requirements as their preferred approach for the Local Plan.
Space standards	Justify the need for space standards by identifying the harm caused or that may be caused in the future.	Noted. Our evidence shows that without specifically requiring residential space standards some developments will be designed to provide new homes below these standards.
Space standards	Require minimum space standards for residential garages.	Noted, proposals regarding parking are addressed in the infrastructure theme, and detailed policy requirements will ensure garages are for purpose.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Provision of open space	Ensure open space provision with new development.	Noted. The preferred options document sets out a preferred approach for the provision of open space within new developments. More detail is included in the Biodiversity and Green Spaces chapter of the Local Plan and accompanying Topic Paper.
Provision of open space	Provide more green spaces with new development.	Noted. The preferred options document sets out a preferred approach for the provision of open space within new developments. More detail is included in the Biodiversity and Green Spaces chapter of the Local Plan and accompanying Topic Paper.
Sustainability	Support sustainable design, encouraging features for energy efficiency, solar panels, renewable energy heating and rainwater collection systems.	Noted, the preferred options document contains a comprehensive proposed policy approach to addressing this in the climate change section and also within the great places section in achieving high quality development.
Sustainability	Require high energy and resource conservation, including water use reduction and microgeneration.	Noted, the preferred options document contains a comprehensive proposed policy approach to addressing this in the climate change section and also within the great places section in achieving high quality development.
Sustainability	Support low and zero carbon design.	Noted, the preferred options document contains a comprehensive proposed policy approach to addressing this in the climate change section and also within the great places section in achieving high quality development.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Sustainability	Resist lowering emission standards.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Sustainability	Set sustainability standards for new development, including energy efficiency, passivhaus and insulation.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Sustainability	Go beyond Building Regulation standards for insulation.	Noted. The Climate Change theme of the preferred options report includes policy proposals regarding net zero carbon buildings, setting out potential standards that could be applied to new development, guided by the findings of the Net Zero Carbon Study.
Sustainability	Provide more green and blue infrastructure, including trees and small forests.	Noted. These issues are addressed in the Biodiversity and Green Spaces section of the preferred options document.
Sustainability	Tax developments which do not meet sustainability standards.	Noted although this is outside the scope of the Local Plan.
Sustainability	Support ecovillages.	Noted, the potential of new settlements has been considered when developing the strategy proposed in the preferred options report. Further information can be found in the strategy topic paper.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General policy recommendations	Policies should be flexible.	Noted. The Councils have included flexibility within the preferred approach for residential space standards and accessible and adaptable homes by listing when exceptions will be considered.
General policy recommendations	Policies should consider viability.	Noted. The Councils have included the requirements for residential space standards and accessible and adaptable homes within the scenarios tested through the Viability Assessment. The Councils will continue to review the viability of the requirements included in the Local Plan as it progresses.
General policy recommendations	Review the viability of previous development to judge viability projections of proposed development.	Noted. The Councils have included the requirements for residential space standards and accessible and adaptable homes within the scenarios tested through the Viability Assessment. The Councils will continue to review the viability of the requirements included in the Local Plan as it progresses.
General policy recommendations	Do not set higher standards than those in current Building Regulations.	Noted. The Councils preferred approach for residential space standards and accessible and adaptable homes is consistent with national planning policy and guidance, and the requirements included refer to Building Regulations and national standards.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
General policy recommendations	Policy requirements should be informed by the evidence base, adhere to national guidance and statutory standards including Building Regulations.	Noted. The Councils preferred approach for residential space standards and accessible and adaptable homes is based on evidence that supported the inclusion of the existing adopted policies and also updated evidence on the housing needs of specific groups. The preferred approach is consistent with national policy and guidance. Further evidence will be developed to support the draft Local Plan.
Broadband	Super-fast fibre broadband should be included with new development.	Noted. The Councils have set out a preferred approach for a criteria based policy for the consideration of digital infrastructure, including broadband. More detail is included in the Infrastructure Topic Paper.
Design recommendations	Support high-quality design, including innovation.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.
Design recommendations	Draw on design principals put forward by pro-design bodies.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.
Design recommendations	Design of new development should reflect vernacular architecture.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan. These include principles for what needs to be provided to deliver high quality design.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Design recommendations	Support prefab design.	Noted. The Councils have not set out specific requirements for the construction methods of new homes, and therefore prefab homes, or other methods of construction could be used by developers provided that the overall design of the new home is consistent with other policies within the Local Plan.
Design recommendations	Support self-build.	Noted. The Councils have set out a preferred approach for self and custom build that requires its provision specifically on developments of 20 dwellings or more, but also allows for any new homes that would be consistent with policy to be provided as self or custom build homes.
Design recommendations	Adopt recommendations from Building Better, Building Beautiful.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.
Design recommendations	Design for health, wellbeing, cohesiveness and social interaction.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.
Design recommendations	Do not support large properties.	Noted. The Councils have set out a preferred approach for the housing mix of new developments that is based on evidence of housing needs. This recommends the provision of a mix of housing types, sizes and tenures.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Design recommendations	Provide internal residential space to work from home.	Noted, the first proposals seeks to implement residential space standards, and also to support adaption of homes where this requires planning permission.
Design recommendations	Provide flexibility to the provision of private residential amenity.	Noted. The Councils preferred approach is for all new homes to have access to private outdoor amenity space. This is important so that developments create places with a high standard of amenity for existing and future users. Outside amenity space is an important part of this and the need for it was emphasised during the coronavirus pandemic.
Development	Support mixed use development.	Noted. The policies in the new Local Plan will enable the delivery of mixed use developments.
Development	Support health impact assessments on large-scale development.	Noted. The Councils preferred approach is to require Health Impact Assessments to accompany planning applications.
Development	Support lifetime homes.	Noted. The Lifetime Homes standard has been replaced by the optional standards for accessible and adaptable homes. The Councils preferred approach sets out a requirement for all homes to meet the M4(2) Building Regulations standard for accessible and adaptable homes.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Development	Developers in Greater Cambridge must adopt the Cambridgeshire Quality Charter for Growth.	Noted. The Great Places chapter of the preferred options Local Plan has been structured around the themes from the Cambridgeshire Quality Charter for Growth.
Development	Favour developers who have committed to Better Buildings Partnership or Advancing Net Zero.	Noted, however the Councils will make decisions on planning applications based on whether the proposed development meets the requirements as set out in the Local Plan rather than based on who is the developer. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.
Development	Encourage developers to market cost-savings of energy efficient new development.	Noted although this is outside the scope of the Local Plan.
Transport infrastructure	Require a higher number of high quality, secure and accessible cycle parking spaces suitable for families and large bikes.	Noted, proposals regarding cycle parking standards are included in the first proposals infrastructure theme.
Transport infrastructure	Provide electric bike charging infrastructure.	Noted, proposals regarding cycle parking standards are included in the first proposals infrastructure theme.
Transport infrastructure	Design car-free development and public spaces.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.

Overarching theme / topic	Summary of issues raised in comments	How the comments have been taken into account
Transport infrastructure	Prioritise walking and cycling routes over vehicles.	Noted. A range of policies to secure high quality design for new homes and places are set out in the Great Places chapter of the preferred options Local Plan.

Appendix 2: Data from the Greater Cambridge Self and Custom Build Register

The Register

South Cambridgeshire District Council and Cambridge City Council have a joint self and custom build register that has been open for entries since April 2016.

Each entry onto the self-build and custom housebuilding register falls within a 'base period'. The first base period began on the day the register was established (1 April 2016) and ended on 30 October 2016. Each subsequent base period is the period of 12 months beginning immediately after the end of the previous base period (i.e. subsequent base periods will run from 31st October to 30th October each year).

Figure 1: Number of entries on the register by base period

Base Period	Number of entries added to Register (within base period)
Base Period 1: 01/04/16 to 30/10/16	69
Base Period 2: 31/10/16 to 30/10/17	89
Base Period 3: 31/10/17 to 30/10/18	135
Base Period 4: 31/10/18 to 30/10/19	204
Base Period 5: 31/10/19 to 30/10/20	142
Total	639

Figure 2: Location of entries on the register at time of registration

Base Period	Living in South Cambridgeshire	Living in Cambridge City	Living outside the area	No information provided
Base Period 1: 01/04/16 to 30/10/16	35	8	24	2

Base Period	Living in South Cambridgeshire	Living in Cambridge City	Living outside the area	No information provided
Base Period 2: 31/10/16 to 30/10/17	45	13	30	1
Base Period 3: 31/10/17 to 30/10/18	65	22	48	0
Base Period 4: 31/10/18 to 30/10/19	99	36	65	4
Base Period 5: 31/10/19 to 30/10/20	68	27	41	6
Total	312	106	208	13

Figure 3: Location preferences for self or custom build plot

Base Period	South Cambridgeshire	Cambridge City	Both	No information provided
Base Period 1: 01/04/16 to 30/10/16	28	1	30	10
Base Period 2: 31/10/16 to 30/10/17	30	3	50	6
Base Period 3: 31/10/17 to 30/10/18	66	6	54	9
Base Period 4: 31/10/18 to 30/10/19	85	6	89	24

Base Period	South Cambridgeshire	Cambridge City	Both	No information provided
Base Period 5: 31/10/19 to 30/10/20	66	4	67	5
Total	275	20	290	54

Figure 4: Property type preferences for self or custom build plot

Type of property?	Registrants between 31/10/19 to 30/10/20	% of Registrations in 2019/20
Detached	129	90.85%
Bungalow	54	38.03%
Semi-Detached	31	21.83%
Terrace	23	16.20%
Flat	9	6.34%

Note: 63 of the 142 registrants between 31/10/2019 and 30/10/2020 stated multiple preferences.

Figure 5: Property size preferences for self or custom build plot

Size of property?	Registrants between 31/10/19 to 30/10/20	% of Registrations in 2019/20
1 bed	7	4.9%
2 bed	28	19.7%
3 bed	68	47.9%
4 bed	72	50.7%
5+ bed	23	16.2%

Note: 55 of the 142 registrants between 31/10/2019 and 30/10/2020 stated multiple preferences.

Duty to Provide Self or Custom Build Plots

Local authorities must grant planning permission for enough suitable serviced plots of land to meet the demand for self-building and custom housebuilding in their area. The level of demand is established by reference to the number of entries added to an authority's register during a base period. A serviced plot of land must have access to a public highway and have connections for electricity, water, and wastewater, or can be provided with access to these things within the duration of a granted permission. There is no expectation that services must be physically connected to the plot at the time of granting planning permission.

At the end of each base period authorities have 3 years in which to permission an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries on the register for that base period. The Act is clear that a grant of permission on a plot may not be considered in relation to more than one base period.

Figure 6: Number of plots with planning permission compared to entries registered

Base Period	Number of entries added to Register (within base period)	Date Required to Provide Planning Permission	Number of Plots with Planning Permission
Base Period 1: 01/04/16 to 30/10/16	69	30/10/2019	69
Base Period 2: 31/10/16 to 30/10/17	89	30/10/2020	89
Base Period 3: 31/10/17 to 30/10/18	135	30/10/2021	-
Base Period 4: 31/10/18 to 30/10/19	204	30/10/2022	-
Base Period 5: 31/10/19 to 30/10/20	142	30/10/2023	-