



Planning Committee Date 6 December 2023
Report to Cambridge City Council Planning Committee
Lead Officer Joint Director of Planning and Economic Development
Reference 23/03417/FUL
Site 184 Thoday Street, Cambridge, CB1 3AX
Ward / Parish Romsey
Proposal Two storey side and single storey rear extensions and change of use from 6 bed HMO (C3) to large 6 bed HMO (8 people) sui generis, along with bike shed storage to the rear.
Applicant Mrs K Edwards
Presenting Officer Phoebe Carter
Reason Reported to Committee Third party representations
Key Issues
1. Future residents amenity
2. Design
3. Cycle parking

Recommendation **REFUSE**

1. Executive Summary

- 1.1 The application seeks planning permission for a single storey rear extension, two storey side and rear extension and to change the use from Class C4(HMO) to Sui Generis (Large Scale HMO).
- 1.2 The proposed change of use would allow for an increase in maximum occupancy to 8 individuals in 6 bedrooms, which is considered a marginal increase in the use of the property and the proposed change of use to a large-scale HMO is not considered to have any adverse impact on the character of the area.
- 1.3 Whilst the proposed HMO meets the space standards set out in Policy 50 and provides a suitably sized internal amenity space and garden, officers consider that the proposal would provide inadequate daylight and sunlight to the communal area and two of the bedrooms would have inadequate levels of privacy.
- 1.4 Officers consider that the proposal would not provide accessible access to cycle and waste storage situated within the rear gardens.

- 1.5 There are no highway safety concerns.
- 1.6 The application is therefore considered to be contrary to policies 35, 48, 56 and 58 of the Cambridge Local Plan 2018.
- 1.7 Officers recommend that the Planning Committee refuse the application.

2. Site Description and Context

None-relevant	X	Tree Preservation Order	
Conservation Area		Local Nature Reserve	
Listed Building		Flood Zone	
Building of Local Interest		Green Belt	
Historic Park and Garden		Protected Open Space	
Scheduled Ancient Monument		Controlled Parking Zone	
Local Neighbourhood and District Centre		Article 4 Direction	

*X indicates relevance

- 2.1 The application site is located on the eastern side of Thoday Street. The dwelling is a two storey semi-detached building built from brick with a hipped tile roof. The building is set back from the street with a parking area at the front, and a rear garden accessed via a side passage. The site is surrounded by other residential dwellings.
- 2.2 The site is outside the controlled parking zone and is not within a conservation area or an area at risk from flooding.

3. The Proposal

- 3.1 The application seeks planning permission for a two storey side and single storey rear extensions and change of use from a 3-bedroom HMO (C4) to a large 6-bedroom eight person HMO (sui generis), along with bike shed storage to the rear.
- 3.2 The proposed two storey side and rear extension projects approximately 1.7 metres from the side elevation and 3 metres from the rear elevation. The proposal has stepped the ridge down so it appears subservient to the host dwelling and has been hipped to retain the character of the existing dwelling. In retaining the hipped roof on the side and rear elevation it will create a gable elevation on the side boundary with No. 186.

3.3 The single storey extension projects approximately 6.4 metres along the common boundary with No. 186 and 7.7 metres from the two storey rear elevation of the dwelling. The proposal has a flat roof and is approximately 3.2 metres in height.

4. **Relevant Site History**

Reference	Description	Outcome
22/00293/FUL	Two storey side, single storey rear and roof extension to create 4 flats	Refused
21/01081/FUL	Side and rear extension to create 4 flats	Withdrawn
20/03020/FUL	Proposed side and rear extension to create 4 Flats	Refused at Planning Committee (03 February 2021)

4.1 The previous application (22/00293/FUL) was refused for the following reasons:

1. The proposed development would represent an overdevelopment of the site, resulting in extensions of a scale and massing which would be out of keeping with the existing building and being overly prominent and bulky in the street and would therefore result in visual harm upon the character of the local area. The proposal is therefore contrary to Cambridge Local Plan 2018 policies 53(c), 55, 56 and 58.

2. The proposed balcony serving Flat 4 on the second floor would result in direct overlooking upon the proposed amenity space serving Flat 2 and the rear amenity area serving No. 186 Thoday Street, to the north. As such, the proposal is contrary to policies 53(d), 55 and 58 of the Cambridge Local Plan 2018.

4.2 The current scheme has been amended from the previous extensions and change of use to 4 flats, to extensions and change of use to a six bedroom eight person HMO (Sui Generis). Officers will assess the revised amendments and change of use within the report below.

5. **Policy**

National

National Planning Policy Framework 2023
 National Planning Practice Guidance
 National Design Guide 2021
 Environment Act 2021

Equalities Act 2010

Cambridge Local Plan 2018

- Policy 1: The presumption in favour of sustainable development
- Policy 3: Spatial strategy for the location of residential development
- Policy 28: Sustainable design and construction, and water use
- Policy 29: Renewable and low carbon energy generation
- Policy 31: Integrated water management and the water cycle
- Policy 35: Human health and quality of life
- Policy 36: Air quality, odour and dust
- Policy 48: Housing in multiple occupation
- Policy 50: Residential space standards
- Policy 55: Responding to context
- Policy 56: Creating successful places
- Policy 58: Altering and extending existing buildings
- Policy 70: Protection of priority species and habitats
- Policy 80: Supporting sustainable development
- Policy 81: Mitigating the transport impact of the development
- Policy 82: Parking management

Supplementary Planning Documents

- Biodiversity SPD – Adopted February 2022
- Sustainable Design and Construction SPD – Adopted January 2020

6. Consultations

6.1 County Highways Development Management – No Objection

6.2 No significant adverse effect upon the Public Highway should result from this proposal.

6.3 Whilst the Highway Authority has no objection to the proposal it is worth noting that as the streets in the vicinity of the application site provide uncontrolled parking, and as there is no effective means to prevent residents from owning a car and seeking to keep it on the local streets, this demand is likely to appear on street. The development may therefore impose additional parking demands upon the on-street parking on the surrounding street and, whilst this is unlikely to result in any significant impact upon highway safety, there is potentially an impact upon residential amenity which the Planning Authority may wish to consider when assessing this application.

6.4 Environmental Health – No Objection

6.5 The development proposed is acceptable subject to the imposition of the condition regarding construction hours. Informatives shall be added to any permission granted about HMO's and licensing.

7. Third Party Representations

7.1 2no. representations have been received. 1 no. has been received in objection and 1 no. has been received in support.

7.2 The one in objection has raised the following issues:

- Character, appearance and scale
- Density and overdevelopment
- Residential amenity impact (impacts on daylight, sunlight, enclosure, privacy, noise and disturbance, light pollution, waste)
- Highway safety
- Car parking and parking stress
- Cycle parking provision
- No existing HMO license
- Large scale HMO's harder to revert back to family dwellings

7.3 The one in support has raised the following reasons:

- Accessible sized rooms can accommodate wheelchairs/carers at an affordable price
- Proposals the same size as 186 Thoday Street
- Other examples of large scale HMO's across the City

7.4 The above representations are a summary of the comments that have been received. Full details of the representations are available on the Council's website.

8. Assessment

Principle of Development

8.1 The applications proposes a change of use to a Large House in Multiple Occupation (HMO). The plans show the property subdivided into 6 bedrooms and it is proposed that up to two of the bedrooms would be for two persons, subject to condition. This would serve a maximum occupancy of eight persons. Policy 48 of the Cambridge Local Plan 2018 supports applications for development of HMO's where they:

- a. do not create an over-concentration of such a use in the local area, or cause harm to residential amenity or the surrounding area;
- b. the building or site (including any outbuildings) is suitable for use as housing in multiple occupation, with provision made, for example, for appropriate refuse and recycling storage, cycle and car parking and drying areas;
- c. will be accessible to sustainable modes of transport, shops and other local services.

8.2 Parts a, b and c of the policy above will be addressed within the following sections of this report.

Design, Layout, Scale and Landscaping

8.3 Policies 55, 56, 57, 58 and 59 seek to ensure that development responds appropriately to its context, is of a high quality, reflects or successfully contrasts with existing building forms and materials and includes appropriate landscaping and boundary treatment.

8.4 Thoday Street comprises pairs of semi detached properties set within modest plots, with reasonable sized garden area to the rear and car parking to the front.

8.5 The proposed single storey rear extension is considered to be of an acceptable size and scale, broadly reflecting the extension at the neighbouring dwelling No. 186, and would not be excessively prominent within the street scene to result in any significant visual impact.

8.6 The proposed two storey side/rear extension would be partly seen in street scene views, especially when approaching the site along Thoday Street from the south, through the gap between Nos. 182 and 184. The form and design with a crown top hipped roof would, set down from the ridge line would appear in keeping to the current form of the dwelling from the streetscene. Officers consider that the proposal has overcome the previous reasons for refusal.

8.7 It is noted by officers that to enable the roof form and side and rear extension, the proposed roof form would result in a gable elevation, projecting approximately 2.7 metres beyond the existing roof, adjacent to the neighbouring pitched roof rear extension. Whilst not visible from the surrounding street scene, the proposal is not cohesive with the pair of semi-detached dwellings and neighbouring extension. The proposal would create an obtrusive addition which would discord with the existing pattern of semi detached properties within this location. In addition, the proposed gable end is proposed to be rendered which is not a material which is common within the area. However, whilst a discordant feature, the proposal would not impact the wider setting and officers consider it would not be reasonable to refuse it on this matter.

8.8 The application proposes an increase in the number of bedrooms at the property to 6 bedrooms with a maximum eight person occupancy. The increase in the occupancy to eight individuals is considered acceptable given the proposed size of the property and is not considered to give rise to any adverse impact on the character of the area and is therefore compliant with policies 48, 55, 56 and 58 of the Local Plan 2018.

8.9 A condition would be added to any permission granted, restricting the maximum occupancy of the HMO proposed to eight persons.

- 8.10 There is no record of any large HMOs located on Thoday Street. For this reason, it is not considered that there is an over-concentration of large HMOs in the area, and so the conversion of the property to a large-scale HMO as proposed is not considered to give rise to any adverse impacts on the character of the area. The development is therefore considered compliant with Policy 48 part a) of the Local Plan (2018).
- 8.11 The application site is situated on Thoday Street and is within an area with good public transport connections and ample active travel arrangements, for this reason the development is considered to be situated within a sustainable location, and so the application is compliant with Policy 48(c) of the Local Plan (2018).
- 8.12 Overall, the proposed development is of an acceptable design that would and be appropriately landscaped. The proposal is compliant with Cambridge Local Plan (2018) policies 48 a) and c), 55, 56 and 58 and the NPPF.

Water Management and Flood Risk

- 8.13 Policies 31 and 32 of the Local Plan require developments to have appropriate sustainable foul and surface water drainage systems and minimise flood risk. Paras. 159 – 169 of the NPPF are relevant.
- 8.14 The proposed extensions will utilise the existing drainage connections to the host dwelling and the scheme will allow for minor changes to the existing garden. Therefore, it is considered unnecessary to request surface or foul water drainage schemes in this case.
- 8.15 The applicants have suitably addressed the issues of water management and flood risk, and subject to conditions the proposal is in accordance with Local Plan policies 31 and 32 and NPPF advice.

Highway Safety and Transport Impacts

- 8.16 Policy 80 supports developments where access via walking, cycling and public transport are prioritised and is accessible for all. Policy 81 states that developments will only be permitted where they do not have an unacceptable transport impact.
- 8.17 Para. 111 of the NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 8.18 The Highways Authority have raised no objections to the proposal.
- 8.19 Subject to conditions, the proposal accords with the objectives of policy 80 and 81 of the Local Plan and is compliant with NPPF advice.

Cycle and Car Parking Provision

Cycle Parking

- 8.20 The Cambridge Local Plan (2018) supports development which encourages and prioritises sustainable transport, such as walking, cycling and public transport. Policy 82 of the Cambridge Local Plan (2018) requires new developments to comply with the cycle parking standards as set out within appendix L which for residential development states that one cycle space should be provided per bedroom for dwellings of up to 3 bedrooms. These spaces should be located in a purpose-built area at the front of each dwelling and be at least as convenient as car parking provision. To support the encourage sustainable transport, the provision for cargo and electric bikes should be provided on a proportionate basis.
- 8.21 Eight cycle Sheffield stands are proposed to the rear of the dwelling, which is an acceptable number to serve the HMO use. However, given the extensive width of the two storey side extension, this would encroach into the side access, reducing the width to 1.4 metres with an access gate of approximately 0.9 metres. This width would prevent easy access for residents to navigate their cycle through to the rear of the property. The Cycle Parking Guide for New Residential Dwellings (2010) sets out that a cycling pushing a cycle needs approximately 1.1 metres in width. In addition, a car parking space to the front of the dwelling would reduce the access to approximately 0.9 metres. As set out within the Local Plan, cycle parking should be situated to the front of dwellings. Therefore, officers consider the application fails to demonstrate how the proposal would provide easily accessible cycle parking and is not in accordance with Policy 82 of the Cambridge Local Plan 2018.

Car parking

- 8.22 Policy 82 of the Cambridge Local Plan (2018) requires new developments to comply with, and not exceed, the maximum car parking standards as set out within appendix L. Outside of the Controlled Parking Zone the maximum standard is no more than 1.5 spaces per dwelling for up to 2 bedrooms and no less than a mean of 0.5 spaces per dwelling up to a maximum of 2 spaces per dwelling for 3 or more bedrooms. Inside the Controlled Parking Zone the maximum standard is no more than one space per dwelling for any dwelling size. Car-free and car-capped development is supported provided the site is within an easily walkable and cyclable distance to a District Centre or the City Centre, has high public transport accessibility and the car-free status can be realistically enforced by planning obligations and/or on-street controls. The Council strongly supports contributions to and provision for car clubs at new developments to help reduce the need for private car parking.
- 8.23 The application proposes one off-street car parking space. Thoday Street is in close proximity to public transport links to the city centre and the area is equipped for active travel arrangements. For these reasons, the site is considered to be situated within a sustainable location and therefore is not deemed car dependant.

- 8.24 Concerns have been raised from the Highways Officer and a third party representation that the increase in occupancy of the property to eight persons will increase the demand for on-street car parking.
- 8.25 When considering that the proposal seeks to increase the occupancy by two persons, the proposal is not considered to likely have a significant impact on the demand in parking. Furthermore, when considering the sustainable location of the site due to its close proximity to public transport links and active travel arrangements, providing access to local shops and the city centre, it is not deemed to be a car dependant location. Therefore, the proposed increase in occupancy is not considered to cause a significant demand in parking on the surrounding streets.
- 8.26 Subject to conditions, the proposal is considered to accord with policy 82 of the Local Plan and the Greater Cambridge Sustainable Design and Construction SPD, in respect of car parking only.

Amenity

- 8.27 Policy 35, 48, 50, and 58 seek to preserve the amenity of neighbouring and / or future occupiers in terms of noise and disturbance, overshadowing, overlooking or overbearing and through providing high quality internal and external spaces.

Neighbouring Properties

Impact on No. 182

- 8.28 The proposed side extension would bring two storey built form closer to the side elevation of 182 Thoday Street, which contains a window serving a bedroom that faces the blank side elevation of the existing dwelling. The proposed extension would reduce the gap between the window and 184 Thoday Street. However, there would remain a separation distance in the region of 5.5 metres from this window. As such, it is not considered that there would be a significant adverse impact upon this window in terms of loss of light, beyond that already resulting from the two-storey massing of the existing dwelling to the north of this window.
- 8.29 Given the siting to the north and the separation of the dwellings, the proposal is not considered to give rise to any harmful overlooking or loss of light or overbearing impact on the neighbouring amenity.

Impact on No. 186

- 8.30 The proposed two storey rear extension would not project beyond the rear elevation of no.186 Thoday Street. As such it is not considered that the projection of the proposed two storey extension would result in a significant adverse impact in terms of visual enclosure or loss of light. The views of the windows proposed in the rear elevation would be available from the first floor windows present in the existing dwelling and therefore the proposal is not considered to lead to a significant increase in loss of privacy and overlooking.

- 8.31 There is a window and a door in the side elevation of single-storey extension at 186. However, these serve a utility room and a shower room as opposed to habitable rooms and as such the presence of the proposed single storey extension is not considered to result in a significant adverse impact on residential amenity in respect of these windows.
- 8.32 There is a ground floor window in the rear elevation of 186 that serves a dining room. The dining room window faces the wall of the rear extension at 186 and a passage which runs between the side of the extension and the boundary with the application site. The shared boundary alongside the extension at 186 is marked with a timber fence approximately 2 metres high and an overgrown outbuilding within the application site, constructed from brick with a pitched roof. The brick building is approximately 1.5 metres behind the rear elevation of no.184.
- 8.33 Based on the rear wall of the original dwelling, there would be a fallback position for an extension to the existing dwelling of an additional one metre from the existing rear elevation, under the permitted development rights conferred through Class A part 2 of the General Permitted Development Order. An extension of this length would largely fill the gap between the existing rear elevation of the building and the overgrown brick outbuilding.
- 8.34 When taking the availability of this fallback into account, it is considered that the presence of the proposed extension would not result in a significant adverse impact to the adjacent window beyond that which already exists, due to the presence of the rear extension at 182 and the adjacent brick outbuilding.
- 8.35 In the opinion of officers, the proposal would not result in a significant adverse impact upon the residential amenity of neighbouring properties and it is considered that it is compliant with Cambridge Local Plan (2018) policies 35, 48, 55, 56 and 58 in this respect.

Future Occupants

- 8.36 Under permitted development rights, the property can operate within use class C4 (small size HMO) which allows accommodation for up to six individuals without the need for planning permission. This application seeks permission for an eight person HMO, by providing six bedrooms. The gross internal floor space measurements for each of the units in this application are shown in the table below:

Unit	Number of bed spaces (persons)	Policy Size requirement (m ²)	Policy Size requirement for double bedroom (m ²)	Proposed size of unit	Difference in size over requirement for a double room (m ²)
1	1 or 2	7.5	11.5	22.7	+11.2
2	1 or 2	7.5	11.5	19.37	+7.85
3	1 or 2	7.5	11.5	19.5	+8
4	1 or 2	7.5	11.5	17.4	+5.9

5	1 or 2	7.5	11.5	15.6	+4.1
6	1 or 2	7.5	11.5	13	+1.5

- 8.37 The application does not make it clear as to which bedrooms are allocated for accommodating two bedspaces. Despite this all bedrooms exceed the minimum floor area of 11.5m² to provide a double bedroom which is acceptable in this instance. Therefore, the application complies with the minimum space standards set out under policy 50 of the Cambridge Local Plan (2018).
- 8.38 The property is considered to have an acceptable provision of communal space, approximately 30sq metres, provided for eight persons. However, given the siting of the communal area centrally within the building it is considered that the communal area would not receive adequate light to the communal area and the quality of the space is poor. The room is the full width of the building, 6.7 metres, with a single window and door on the side elevation of the building. This window, whilst facing south, is set approx. 1.7 metres off the boundary which has a 1.8 metres high boundary fence, and faces the two storey side elevation of no. 182 Thoday Street set approximately 5 metres away. While this provides two sources of light, officers have concerns as the window is relatively small and would provide limited amounts of natural light to the full depth of the room leading cumulatively to a dark and uninviting communal space. The window would also have a poor and limited outlook onto the side passageway. The cumulative impact of the size of the window, siting centrally on the side elevation and poor outlook from this room results in an overall living environment which would be enclosed. No daylight sunlight assessment has been provided to demonstrate that the communal space would provide natural light to a sufficient level. Taking the above into account, the proposal would provide a substandard and poor quality living environment for future occupiers as it would fail to achieve satisfactory daylight and sunlight within the proposed extensions. The proposal fails to provide an adequate level of residential amenity for future occupiers and is not compliant with Policy 48 (b) and 56 of the Cambridge Local Plan 2018.
- 8.39 In terms of the external amenity space, it is sited to the rear of the dwelling and adjacent to the neighbouring garden areas. The garden is accessed from the communal living area via the side passageway. The space is considered to be an appropriate size to accommodate seating, storage and drying areas. However, the amenity space would be located to the rear of bedrooms 2 and 3, which have direct access onto the amenity space. These rooms are served by a roof light and French doors. The sole cycle parking for the dwelling is to the rear of the bedrooms, forming a break between the main amenity area and the bedrooms. Given the proximity to the bedrooms it is considered that the storage of the cycles and additional comings and goings would harm the privacy of these bedrooms and officers are concerned that the movement of people associated with the HMO so close to the bedroom window would be detrimental to the privacy of the occupants. Obscure glazing would not provide the occupants with satisfactory living accommodation as this is the principal window in the bedroom. It would be unreasonable to condition obscure glazing. Furthermore, the noise and disturbance by others using the bike store and garden in close proximity to the openable windows would impact the occupants of these rooms. The proposal fails to provide an adequate level of residential amenity for future

occupiers and is not compliant with Policy 35, 48 (b) and 56 of the Cambridge Local Plan 2018.

Construction and Environmental Impacts

- 8.40 Policy 35 guards against developments leading to significant adverse impacts on health and quality of life from noise and disturbance. Noise and disturbance during construction would be minimized through conditions restricting construction hours and collection hours to protect the amenity of future occupiers. These conditions are considered reasonable and necessary to impose. In addition, informatives regarding HMO's are recommended and will be added to any permission granted.

Summary

- 8.41 The proposal adequately fails to respect the amenity of its neighbours and of future occupants and is considered that it does not accord with Cambridge Local Plan (2018) policies 35, 50, 51, 52, 53, 57 and 58.

Third Party Representations

- 8.42 The remaining third-party representations not addressed in the preceding paragraphs are summarised and responded to in the table below:

Third Party Comment	Officer Response
No existing HMO license	This is a civil issue and not a requirement of Planning Permission
Large scale HMO's harder to revert back to family dwellings	Large HMO's, as set out within Policy 48 of the Local Plan 2018, have an important role to play within the local housing market and therefore cannot be assessed on how the application could be reverted to a dwelling house.
Same size as 186 Thoday Street	Whilst the proposal does not extend beyond the depth of No. 186 Thoday Street each application is assessed on its own merits and against National and Local Planning Policies
Accessible sized rooms	No documents within the application have stated that the proposed rooms are fully accessible for wheelchairs. Whilst this is encouraged, the overall proposals have to be assessed against National and Local Policies.

Planning Balance

- 8.43 Planning decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (section 70(2) of

the Town and Country Planning Act 1990 and section 38[6] of the Planning and Compulsory Purchase Act 2004).

Summary of harm

- 8.44 The proposal fails to provide an adequate level of residential amenity for future occupiers due to the lack of light to the communal area creating a dark and uninviting living space. It is also considered that Bedroom 2 and 3, given the location and proximity of the cycle store, would have an unsatisfactory level of privacy. Overall, the proposal is not compliant with Policies 35, 48 (b) and 56 of the Cambridge Local Plan 2018.
- 8.45 In addition, the proposal fails to provide an accessible cycle parking and the proposal fails to comply with policies 48 and 82 of the Local Plan 2018.

Summary of Benefits

- 8.46 The development will positively contribute to the supply of residential accommodation available to the public within Cambridge.
- 8.47 Having taken into account the provisions of the development plan, NPPF and NPPG guidance, the views of statutory consultees and wider stakeholders, as well as all other material planning considerations, the proposed development is recommended for refusal.

9. **Recommendation**

9.1 **Refuse** for the following reasons:

1. By virtue of the single window and door serving the communal area, the proposal would create a dark and uninviting living space and would result in a substandard living environment for future occupiers. The rooms would be served by a single aspect window and door whilst with a south facing, the window would be overshadowed by No. 182 Thoday Street. In addition, given the depth of this room alongside the size of the windows serving it, the living space is likely to receive insufficient light levels. No evidence has been provided to demonstrate adequate light levels for the proposed unit would be provided. By failing to be of high-quality design which creates a suitable standard of amenity for future occupiers, the proposal would be contrary to policy 48 and 56 of the Cambridge Local Plan (2018).
2. Bedrooms 2 and 3 of the proposed HMO would be served by a window and French doors accessing the rear amenity space and a secondary velux window. Concerns are raised that the movement of people associated with the HMO accessing the cycle store is within 3 metres of the windows which would be detrimental to the privacy of occupants of the bedrooms. Obscure glazing this room would not provide occupants with satisfactory living accommodation. As such the proposed development would result in a significant adverse impact upon the

residential amenity of occupants of Bedrooms 2 and 3, contrary to Policies 35, 48, and 56 of the Cambridge Local Plan 2018.

3. The proposed cycle parking, by way of the inadequate access width and difficult to navigate access to the rear cycle store, would fail to provide sufficiently convenient and usable cycle parking suitable for the HMO and would conflict with the requirements of appendix L paragraph 24 of the Cambridge City Local Plan contrary with the Cambridge City Local Plan (2018) Policies 48 and 82.