

CC6/CCC



Examination into the Soundness of the Cambridge
Local Plan

**Matter CC6 – Maintaining a Balanced Supply of
Housing**

Matter Statement by Cambridge City Council

March 2017

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Abbreviations

HESA	Higher Education Statistics Agency
HMO	Housing in Multiple Occupation
NPPF	National Planning Policy Framework
PBSA	Purpose Built Student Accommodation
PPG	Planning Practice Guidance
RMP	River Moorings Policy
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
THS	Technical Housing Standards
WMS	Written Ministerial Statement

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Introduction

1. This statement sets out Cambridge City Council's response in relation to the Inspectors' Matter CC6 regarding Maintaining a Balanced Supply of Housing.
2. The documents referred to in this statement are listed in Appendix 1; and examination document reference numbers are used throughout for convenience.

Matter CC6A: Specialist Colleges and Language Schools, Student Housing, Housing in Multiple Occupation

Overview

3. The emerging Local Plan acknowledges the competing development pressures in Cambridge, including student accommodation. The Council has always considered it important that a balanced approach is taken within the remit of sustainable development in order to support the economic and social needs as well as quality of life and place in the city. In summary, the Council recognises that there is a need for student accommodation in Cambridge. There is however no requirement within national planning policy or otherwise to provide Purpose Built Student Accommodation (PBSA) for all existing and future students in the city as to do so would impact detrimentally on the supply of land across the city to meet other development needs. The strategy of the Council is therefore to maintain the current balance between PBSA, shared existing housing and other forms of accommodation used by students and to address forecast growth during the plan period through provision of new PBSA for future need. In addition, the plan provides, through Policy 46, flexibility to meet any further demonstrated need for student accommodation which may arise during the plan period.
4. As such, the Council is not suggesting a major change of direction in the strategy for student accommodation in the emerging Local Plan and considers that student accommodation can continue to be provided in a variety of ways, through allocations for student accommodation and through the delivery of windfall sites.
5. Having recognised a number of emerging issues¹, the Council commissioned the Cambridge Centre for Housing and Planning Research to investigate issues relating to the provision of student accommodation in Cambridge. The Cambridge Centre for Housing and Planning Research's Assessment of Student Housing Demand and Supply² for Cambridge City Council is referred to in this statement as the "student accommodation study."

¹ Since the emerging Local Plan was submitted for examination in March 2014, a new element of the PPG was introduced in 2015 in respect of student accommodation. The Council has also dealt with a significant appeal for student accommodation on an existing housing allocation (App/Q0505/W/15/3035861) at 315 – 349 Mill Road (RD/H/740); and an increasing number of applications have come forward for student accommodation, with a particular emphasis on the provision of studio units as part of sui generis student accommodation.

² RD/CFM/030

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6. The student accommodation study includes a baseline analysis of the current structure of the student population, the current accommodation used by students, and the future plans of the different educational institutions. It analyses what the level of PBSA would be if all current and potential future students were to be accommodated in PBSA, rather than, for example, in shared housing in the private rented market. The report also reviews relevant planning policies adopted or proposed by other local authorities experiencing particular pressure from student numbers.
7. The student accommodation study has identified current student numbers and projections of future student numbers (full-time) for the universities, and a large number of specialist colleges and language schools in Cambridge, and the types of courses that they are attending. This has included data collection from:
- University of Cambridge, including all its 31 colleges;
 - Anglia Ruskin University;
 - Over 40 colleges of further education, specialist colleges and language schools, and affiliated organisations such as the colleges which form the Cambridge Theological Federation.
8. The student accommodation study shows that the number of students at educational institutions in Cambridge with a need for some form of accommodation is estimated at 46,132 in 2015/16. Within the 46,132 students total, the student numbers per institution in the academic year 2015/16 are set out in Table 1 below.

Table 1: Number of Students 2015/16 with a need for accommodation

Institution	Student Numbers
University of Cambridge	21,227
Anglia Ruskin University	9,485
Other institutions	15,420
Total	46,132

9. There are an estimated 46,132 students in Cambridge with a need for some form of accommodation³. Within the 46,132 students total, the student numbers per type of accommodation in 2015/16 are set out in Table 2 below.

Table 2: Type of Accommodation 2015/16

Type of Accommodation	Student Numbers
Purpose built student accommodation	22,410
Shared housing	9,157
Existing family housing (parental home or homestay)	12,129
No information available	2,436
Total	46,132

³ This could include students who commute into the city from other authorities.

10. The numbers in Table 2 classify the seven types of accommodation used for Higher Education Statistics Agency (HESA) returns⁴, plus a category for ‘homestay’ students, into four broad groups:
- PBSA, which includes University/College maintained accommodation and private halls developed and owned by non-university/college organisations.
 - Shared existing housing, which includes both ‘own permanent residence either owned or rented by you’ and ‘Other rented accommodation (shared with others on a temporary basis)’.
 - Existing family housing, which includes the parental home and ‘homestay’ where people lodge with existing households in Cambridge.
 - No information, which includes the ‘other’ and ‘not known’ categories in the HESA data.
11. Some 91% of undergraduates, and 55% of postgraduates at the University of Cambridge are in University or College maintained accommodation, compared to 11% of undergraduates and 15% of postgraduates at Anglia Ruskin University.
12. Anglia Ruskin University is therefore currently dependent upon housing 4,285 undergraduates and 785 postgraduates in shared housing, a total of 5,070 students, occupying at least 1,000 shared houses, assuming an average of 5 students to each shared house. The position is reversed for the University of Cambridge, where only 729 undergraduates are housed in shared existing housing, but 3,003 postgraduates are accommodated in shared existing housing, occupying at least 600 shared houses, again assuming an average of 5 students to each shared house.
13. The non-university institutions have very little directly owned accommodation (750 bed spaces among 15,420 students), but make extensive use of private halls (3,836 bed spaces, or 82% of all student accommodation in private halls). The non-university institutions house 4,390 students in ‘homestay’ accommodation, and a further 5,304 are living in the parental home (mainly Cambridge Regional College students). The non-university institutions make relatively little use of shared housing, with only 355 students accommodated in shared housing, or only 2% of the total number of non-university institution students. Many non-university institutions rely on use of PBSA during the vacation periods, especially to accommodate summer language course students. This includes PBSA provided by the Colleges of the University of Cambridge and privately provided student accommodation where there are clauses in the legal agreements to allow use by non-university students outside term-time.
14. Excluding mature students who are less likely to be living in shared accommodation, there is an estimated current potential for 6,085 bed spaces in PBSA if all the existing student population were to be provided with such accommodation. The research then analysed the impact of the growth plans of the universities and asked about the potential impact of Brexit on those plans. Anglia Ruskin University is planning to remain at the same student numbers in Cambridge over the next five to ten years.

⁴ The seven types of housing, plus homestay, are set out in Table 2: Number of students and accommodation in Cambridge 2015/16, page 6, RD/CFM/030.

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The University of Cambridge’s current planning framework envisages an expansion in undergraduate numbers of 0.5% each year for the next ten years, and in postgraduate numbers of 2% per annum, with some individual Colleges having higher expansion rates than others. This leads to an estimated future potential 2,874 additional student bed spaces to 2026. The other institutions have an anticipated growth rate of 230 students in total to 2026. This suggests that a total of 9,189 student bed spaces could be built in PBSA by 2026 to address both the current and the potential future levels of student numbers. As at 31 March 2016, there were 1,281 student bed spaces in the planning pipeline⁵. Once completed, and provided that they are occupied by students, this will reduce the current level of students outside PBSA from 6,085 to 4,804, and reduces the future potential level of students outside PBSA from 9,189 student bed spaces to 7,908.

Table 3: Current and Future Potential Levels of PBSA

Institution	Current potential level of PBSA	Future potential level	Total current and future potential level
Anglia Ruskin University	2,803	-	2,803
University of Cambridge	3,282	2,874	6,156
Other institutions	-	230	230
Sub-Total	6,085	3,104	9,189
Total Minus Pipeline of 1,281 bed spaces to 31 March 2016	4,804	-	7,908

15. The study reports that if all current and potential future students were to be accommodated in PBSA, there would need to be provision of 7,908 bed spaces, having taken into account student accommodation units already in the pipeline. While the NPPF confirms at paragraph 17 that local authorities should consider development needs other than simply housing and employment, there is no part of national planning policy that says that all students are required to be provided for in PBSA. The student accommodation study recognises that students have different needs and make different choices and that PBSA will not be suitable for all students. The student accommodation study also notes that it has not been possible to set growth rates of the institutions beyond 2026 since the institutions themselves do not have firm growth plans beyond that date. There is therefore no coverage of the last five years of the plan period. This is considered reasonable, given the uncertainties over forecasting beyond 2026 and ongoing concerns over the impacts of Brexit on the higher education sector.

⁵ Pipeline figures consist of student bed spaces which have planning permission, but are not yet built or are under construction and not yet occupied.

16. In the absence of a national policy requirement to provide PBSA, the ongoing uncertainty about needs beyond the next ten years, and the provision of student accommodation which continues to be made through both allocations and windfall sites, it is considered that there is no justification to conclude that the Council's current approach in the emerging Local Plan, which includes not seeking to deliver PBSA for all of the existing student population, is other than sound.
17. Policy 46 is capable of delivering accommodation that would lead to an increase in provision to address the identified future growth aspirations of the institutions and to provide additional flexibility if need for further student accommodation is demonstrated. The Council is not seeking through the Local Plan to provide PBSA for all of the existing resident student population. To do so would require a substantial modification to the development strategy for the current submitted Local Plan which it is not appropriate to introduce at this stage, nor is there any policy requirement to do so. To do so would also result in either the need for substantial further allocations or for re-allocation of existing land which would be likely to have the effect of not meeting other development needs.
18. The student accommodation study identifies that the University of Cambridge is looking to grow by a further 2,874 students to 2026. While Anglia Ruskin University has confirmed that it has no growth aspirations to 2026, a number of the other institutions in Cambridge have stated aspirations to grow. These institutions have a total growth figure to 2026 of 230 students in total. This gives rise to a total growth figure for the universities and the other institutions of 3,104. Taking into account student accommodation pipeline figures of 1,281 student units under construction or with planning permission, allocations in the emerging Local Plan (as modified) providing 740 student units and the remaining allocation at North West Cambridge for 1,675 student units, these sources of supply would address and go beyond the growth figure of 3,104. The additional 592 units provide an appropriate and prudent degree of flexibility in terms of delivery. Any provision over and above these sources of supply would need to be considered on its merits against the criteria in Policy 46 and having regard to the absence of any policy requirement at either national or local level for all students to be provided with PBSA.
19. Although the current strategy for meeting student accommodation requirements is still considered appropriate, a number of proposed modifications⁶ are suggested to the emerging Local Plan to reinforce the Council's approach and ensure that needs for market and affordable housing and student accommodation can be addressed.
20. The proposed modifications can be summarised as follows:
 1. **Policy 3: Spatial strategy for the location of residential development**

This policy will be strengthened alongside Policy 46: Development of student housing to ensure that existing housing and housing allocations are not lost to student accommodation. This main modification is proposed to safeguard residential allocations which have been proposed in the emerging Local Plan in order to meet

⁶ Appendix 1, RD/CFM/010

objectively assessed housing need. It is considered that the plan is positively prepared and justified in respect of meeting objectively assessed need for housing and that this modification confirms that these allocations should not be lost to other forms of development, including student accommodation. Without this modification, residential allocations continue to be at risk. The Council considers that this is particularly important in light of the recent Mill Road appeal decision⁷ on an existing housing allocation in the Cambridge Local Plan 2006.

2. Policy 46: Development of student housing

This policy will be strengthened to ensure that housing allocations are maintained alongside modifications to Policy 3: Spatial strategy for the location of residential development. It will also be amended to confirm that schemes are tied to particular institutions, which have specific need for accommodation. The type of accommodation will need to be suitable for the institution in terms of type and layout, affordability and maintenance regime.

A principal purpose of these main modifications is to safeguard residential allocations which have been proposed in the emerging Local Plan in order to meet objectively assessed housing need. It is considered that the plan is positively prepared and justified in respect of meeting objectively assessed need for housing and that these modifications confirm that these allocations should not be lost to other forms of development, including student accommodation. Without these modifications, residential allocations continue to be at risk. As already stated, the Council considers that this is particularly important in light of the recent Mill Road appeal decision⁸ on an existing housing allocation in the Cambridge Local Plan 2006.

The further main modification requiring an institution to be committed to the proposed scheme, through a formal agreement, will support the effectiveness of the plan in ensuring that the accommodation proposed reflects the student accommodation requirements of specific institutions such as Anglia Ruskin University and the University of Cambridge. This formal agreement with the institution will confirm that the accommodation will be occupied by students of the institution undertaking full-time courses of one academic year or more. When planning permission is granted for new student accommodation, a planning agreement will be used to robustly secure that use. This policy only applies in instances where planning permission is required for schemes housing more than six students (*sui generis*). By requiring a specific institution to be tied to a planning permission, the institution will need to have confirmed to the Council that the type, layout, affordability and maintenance regime of the accommodation is suitable for their students. Without this modification, there is a significant risk that the development proposals coming forward for student accommodation will not meet the needs of the institutions identified in the student accommodation study.

There are a number of additional modifications throughout the plan which reflect the proposed modifications on student accommodation and the findings of the student accommodation study.

⁷ RD/H/740

⁸ Ibid

3. Conversion of two existing residential allocations (Sites R17: Mount Pleasant House and U1: Old Press/Mill Lane) to allocations for student accommodation

These main modifications are proposed as a result of discussions with the landowners to bring forward development on the Mount Pleasant House site (Site R17) and Old Press/Mill Lane site (Site U1). Both landowners have confirmed that mainstream residential accommodation will not be deliverable on these sites and that student accommodation is being pursued.

These main modifications are in keeping with the requirements for plan-making in that they are positively prepared, justified and effective. These allocations are deliverable for student accommodation. On the information which has now been provided, it has been demonstrated that the allocations are not deliverable as mainstream housing. As such, the modifications seek to provide allocations which, on all of the information presently available, are deliverable on the sites.

Residential allocations within Cambridge remain vitally important in meeting the city's objectively assessed need for homes. However, the two sites proposed for a change in allocation from residential to student accommodation have very specific circumstances. Both sites are very well located to meet the known student accommodation needs of at least seven Colleges of the University of Cambridge. They lie in close proximity to existing main sites for these seven Colleges, which provide a range of services to their students. By balancing the retention of the significant majority of residential allocations in the Local Plan, while allowing two allocations to change to student accommodation, this addresses both objectively assessed need for homes and the known needs for student accommodation.

6A.1 Policy 44: Specialist colleges and language schools

i. Is the requirement that residential accommodation for all non-local students should be provided concurrently with the education facilities justifiable given that there is no such requirement for the Cambridge University colleges or the Anglia Ruskin University?

21. Policy 44 recognises the economic benefits that the growth of language schools and other specialist colleges can bring, and seeks to support that growth, providing that any growth in student numbers is appropriately accommodated. However, there is a significant difference in scale between the universities and the other institutions which attract students to Cambridge⁹, and the types of students attracted to Cambridge differ significantly between institutions. Many of the other institutions' students are on short-term courses and are of varying ages, with some very young overseas students with significant funds for accommodation.

22. In the past, the Council has not sought to tie the growth of an educational institution to provision of student accommodation for that institution, but has instead tried to limit the

⁹ The largest of the other institutions is Cambridge Regional College, which attract students predominantly from the Cambridge area. Cambridge Regional College does not give rise to considerable levels of need for student accommodation provision.

growth of institutions. The Council is changing this approach so as to support the growth of institutions, to be consistent with the NPPF.

23. In recent years, however, there has been significant growth of student accommodation in Cambridge. The Council commissioned consultants to undertake the student accommodation study discussed in the paragraphs above to look at this locally important issue, as it has a wider impact on local character and on the provision of other uses (e.g. market and affordable housing).
24. Following receipt of the student accommodation study, the Council remains convinced that supporting the growth of educational institutions in Cambridge is appropriate. The Council considers it justifiable to require specialist colleges and language schools to provide student accommodation to meet their growth needs, while not requiring the University of Cambridge Colleges or Anglia Ruskin University to make similar arrangements. There are two main reasons that the Council consider this approach is justifiable:
- There is a difference in size and contribution to the Cambridge economy between the University of Cambridge and Anglia Ruskin University compared to the specialist colleges and language schools;
 - The specialist colleges and language schools offer a wide variety of courses, many of which do not require long-term accommodation for their students. The Council would not wish to see the displacement of full-time students from new or existing student accommodation through the provision of accommodation for those attending financially lucrative short courses.

This approach also allows the Council to monitor and manage the provision of accommodation for students.

25. The University of Cambridge and Anglia Ruskin University have over 30,000 students, the majority of them on full-time courses. The University of Cambridge is a world-leading institution in higher education and research, is consistently ranked in the top three research universities globally and is a vital driver of the high-tech, knowledge-based Cambridge economy. Anglia Ruskin University also generates world leading research and has a number of courses which perform highly at a national level. Although the specialist colleges and language schools in Cambridge also contribute to the Cambridge economy¹⁰, with approximately 15,000 students from over 40 different institutions, the scale of this contribution is necessarily smaller than the two large universities not least since many of those students attend short courses. The Council wishes to avoid the potential for full time students attending the two principal institutions from being displaced from existing and future accommodation by those who may be attending shorter courses at specialist institutions, many of whom may have greater disposable resources. The Council considers that if the non-university institutions wish to expand, however, the resulting impact on accommodation needs to be explained. This is not considered to substantially impede the growth of the

¹⁰ RD/E/060, Cambridge Cluster at 50: The Cambridge economy; retrospect and prospect, page 90, paragraphs B3.36 – B3.37.

institutions, as many students are already provided for in homestay and in PBSA outside term-time.

26. Most students at the University of Cambridge and Anglia Ruskin University are full-time students in their late teens and early twenties studying three year undergraduate courses or slightly older full time students studying postgraduate courses of one to four years. Students studying at specialist colleges and language schools in Cambridge study a wide variety of courses of greatly differing length. Some courses are only a few weeks long and some students who attend courses are under 16 years of age. Many students are only in the country for a short period of time. The accommodation needs of specialist colleges and language schools are fundamentally different and more varied than those of the University of Cambridge and Anglia Ruskin University.
27. Policy 44 seeks to ensure that when specialist colleges and language schools intend to expand their student numbers, they consider and plan for how the accommodation needs of the new students are to be met. This need can be met in a number of different ways, for example through home-stay, use of existing accommodation outside of term time and purpose built student accommodation within the curtilage of the college/school.

6A.2 Policy 46: Development of student housing

- i. **Does the policy accord with paragraph 159 of the National Planning Policy Framework (the Framework) as the policy is based on the necessity for the applicant to demonstrate the need for any development which would provide student accommodation rather than to meet the objectively assessed need established through the Local Plan process?**
28. The Council considers that the policy (as amended) accords with paragraph 159 of the NPPF, which requires local planning authorities to have a clear understanding of the housing needs of their area. This understanding should address the needs of all types of housing and the needs of different groups in the community.
29. The need for new homes in Cambridge is set out in the Objectively Assessed Housing Need: Further Evidence¹¹. The Council commissioned work on the need for student accommodation in Cambridge¹² in 2016. This student accommodation study supplements the work on objectively assessed need by specifically looking at overall existing student numbers, the way students were accommodated in the city in the 2015/16 academic year, and the growth plans of the further and higher education institutions in Cambridge. This work and the amended policy together meet the requirements of the PPG¹³, in respect of extensive engagement with institutions and the consideration of needs of the student population as well as local residents.
30. The student accommodation study recommends that the policy position should be to require the proposed accommodation to be tied to a specific educational institution, or

¹¹ RD/MC/040

¹² RD/CFM/030

¹³ Paragraph Reference: 2a-021-20160401, RD/NP/020

a group of institutions, through either a long-term lease or long-term nomination agreement¹⁴. The policy basis for asking an applicant to demonstrate the need for student accommodation development is based on two main issues:

- The Council does not consider that student accommodation can be counted towards the Council's objectively assessed need for homes;
- The need to ensure that new student housing is clearly aimed at a particular type or group of students to ensure that development is meeting the need which the proposal is intended to address.

Counting student accommodation towards Objectively Assessed Need for homes

31. The student accommodation study identified that "There is little evidence that PBSA has resulted in a release of former student-occupied HMO back into the housing market: most planning documents refer to 'relieving pressure' rather than to any substitution effect. In the Cambridge housing market, discussions with Anglia Ruskin University suggests that landlords are withdrawing properties from the student HMO market, refurbishing to higher standards, and re-letting them as HMO into the 'professional' market (which may include postgraduate and postdoctoral tenants)¹⁵."
32. Furthermore, different authorities are taking different approaches towards discounting the number of units freed up. To provide a hypothetical example, it may be possible to average the number of students occupying housing to 4 students per house and accordingly work out that a scheme for 100 student units might free up 25 houses. However, this assumes that the houses are all freed up and that non-students will occupy them in the future. This may not be the case, for example if the institution grows its numbers of students, HMO may be re-occupied by students. Some authorities have been cautious about this and have discounted the indicative figure of 25 housing units to indicate that a lesser number of housing units would actually be freed up and returned to the market/mainstream rental. Discounting does not necessarily appear to be based on any specific evidence though. The circumstances are further complicated by the recent Local Plans Expert Group Report¹⁶, which suggested that there should be specific exclusion of specialist types of accommodation as components of housing supply.
33. Given the limited land availability in Cambridge and the need to provide more affordable housing to meet a range of needs, it is important that the council takes all reasonable opportunities to provide new market housing and affordable housing. The Council is committed to supporting the University of Cambridge, the Colleges, Anglia Ruskin University and other institutions, which contribute to the knowledge economy, and acknowledges the important role that they play locally, nationally and

¹⁴ RD/CFM/030 page 11, paragraph 1.36

¹⁵ RD/CFM/030, page 70, paragraph 6.10, pp.70

¹⁶ The Local Plans Expert Group was established by the Communities Secretary, Greg Clark and the Minister of Housing and Planning, Brandon Lewis MP, in September 2015, with a remit to consider how local plan making could be made more efficient and effective. Their report was issued in March 2016.

internationally. However, the importance of and need for student accommodation must be balanced with the need to deliver market and affordable housing.

Ensuring that new student housing is clearly aimed at a particular type or group of students to ensure that development is meeting the need which the proposal is intended to address

34. Requiring proof that development is meeting currently unmet need ensures that the delivery of student accommodation does not impact on the Council's aim of meeting its objectively assessed need for homes. There have been instances where speculatively developed PBSA has not met the needs of the institution it was intended to serve, e.g. the affordability needs of Anglia Ruskin University students¹⁷. Development must be of the appropriate type, form and cost and in the right location to meet the needs of an institution. If PBSA is not brought forward and tied appropriately to the relevant institution, this could result in an increase in HMO use that could slow down progress towards addressing the Council's objectively assessed need for homes.
35. In addition, the student accommodation study noted that "Locally, demand for student accommodation is considered to have placed pressure on the local housing stock often resulting in perceived or actual harmful impacts on communities accommodating students, especially in areas close to Anglia Ruskin University¹⁸."
36. Asking an applicant to demonstrate the need for student accommodation development enables the Council to ensure that student development is planned appropriately and in the appropriate location for the institution served. By planning appropriately, the Council also ensures that it meets the requirements of the NPPF by promoting the use of sustainable transport modes and discourages students from keeping cars in Cambridge.
37. Finally, paragraph 159 of the NPPF asks that Councils prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs; the student accommodation study provides information on the impact of student accommodation on housing needs as indicated above. Student accommodation needs to be adequately assessed as part of the overall planning process and in future revisions of the SHMA. The student accommodation study provides a starting point for the assessment of this information and will be taken into account more transparently as part of the overall assessment of housing need.

¹⁷ RD/CFM/030, page 78, paragraph 7.16

¹⁸ RD/CFM/030, page 16.

- ii. **Is criterion (a) [and criterion (c) by implication] of the policy too restrictive as the criteria tie any proposed student accommodation to the educational institution which is seeking to provide it whereas paragraph 14 of the Framework requires that the Plan should meet objectively assessed needs with sufficient flexibility to adapt to rapid change?**
38. The reasoning behind the requirement for evidence of need for student accommodation is based on the Council's overall strategic approach to provision of student accommodation, whereby future growth needs are to be met, but provision is not made to provide for all existing and future students. Criterion (a) is therefore integral to the implementation of that strategic approach.
39. Indeed, criterion (a) and criterion (c) will support the effectiveness of the plan in ensuring that the accommodation proposed reflects the student accommodation requirements of specific institutions such as Anglia Ruskin University and the University of Cambridge. This formal agreement with the institution will confirm that the accommodation will be occupied by students of the institution undertaking full-time courses of one academic year or more. When planning permission is granted for new student accommodation, a planning agreement will be used to robustly secure that use. This policy only applies in instances where planning permission is required for schemes housing more than six students (*sui generis*). By requiring a specific institution to be tied to a planning permission, the institution will need to have confirmed to the Council that the type, layout, affordability and maintenance regime of the accommodation is suitable for their students. Without this modification, there is a significant risk that the development proposals coming forward for student accommodation will not meet the known needs of the institutions identified in the student accommodation study.
40. To ensure flexibility in compliance with paragraph 14 of the NPPF, the Council will monitor the delivery of student accommodation annually as part of their monitoring processes and, in the meantime, the Council proposes that a working group is set up to assist in proactive monitoring and coordination of student accommodation issues. It is proposed that Council officers (Housing and Planning) hold a regular working group with representatives of the University of Cambridge and its Colleges, and Anglia Ruskin University. This would allow an opportunity to work collaboratively to address known needs. In addressing the design, layout, affordability and maintenance of student accommodation developments, this working group could produce a design guide and checklist for speculative developers of student accommodation in order to ensure that student accommodation units meet the requirements of the two institutions with the greatest identified need for student accommodation. This working group could also produce up to date work on affordability of student accommodation across the city and address other issues with student accommodation as and when issues occur. The Council's Annual Monitoring Report will provide an opportunity to feedback issues which the working group has dealt with over the monitoring year and will allow the Council to update the known needs of the institutions.
41. The need to address affordability arises from a local concern that, as a result of the growing market of wealthy overseas language students, the costs of purpose built

accommodation is beyond the reach of 'ordinary' students. This is a particular issue in relation to the type of accommodation provided. Recent planning applications have included a high number of studio units, rather than cluster flats (where students have individual bedrooms and bathrooms, but share kitchen and living room space). Anglia Ruskin University, in particular, has stated that studio units are not as suitable for its students as cluster flats, given the higher prices charged for such accommodation and the layout of units not allowing for social interaction. Anglia Ruskin University has confirmed that there have been a number of instances where developers state that the accommodation is for Anglia Ruskin University students, but there is no formal link between the scheme and Anglia Ruskin University given the nature of the units proposed and the lack of affordability. This may mean that individual Anglia Ruskin University students occupy a small number of the units, but the other units are either void or let to other institutions.¹⁹

iii. Is criterion (a) too inflexible to enable alternative models of student accommodation to be provided as some students may not wish to live in cluster style accommodation?

42. The policy at criterion (a) does not restrict institutions to meet all student accommodation needs through the delivery of cluster accommodation. The first paragraph of the policy has, however, been modified in the Further Proposed Modifications to the emerging Cambridge Local Plan – Student Accommodation, Gypsies and Travellers, and Accessible Homes²⁰ to read:

“Proposals for new student accommodation will be permitted if they meet 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 the University of Cambridge or Anglia Ruskin University or other existing educational establishments 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 council will seek appropriate controls to ensure that approved schemes are occupied solely as student accommodation for an identified institution and managed effectively. Applications will be permitted subject to:”

43. The student accommodation study, which has informed the modifications to the policy, acknowledges that not all students will wish to be housed in cluster style accommodation. This is demonstrated in paragraph 1.33 of the student accommodation study²¹:

“The research shows that students are very diverse both within and across different institutions, as are their housing needs. There is an undergraduate

¹⁹ RD/CFM/010, page 9, paragraph 6.6.

²⁰ RD/CFM/010

²¹ RD/CFM/030, page 10.

population of students who reside in Cambridge during term time and who are likely to want some form of institutionally provided accommodation. However, there is a large postgraduate population in Cambridge, some of whom will desire a more 'home-like' form of accommodation."

44. The form of accommodation required can be demonstrated by the submission of appropriate information at application stage. The Council has also confirmed its intention to establish a working group to assist in proactive monitoring and coordination of student accommodation issues. The working group would include Council officers, and representatives of the University of Cambridge and its Colleges, and Anglia Ruskin University. Regular meetings of the working group would allow an opportunity to work collaboratively to address known needs. In addressing the design, layout, affordability and maintenance of student accommodation developments, this working group could produce a design guide and checklist for speculative developers of student accommodation in order to ensure that student accommodation units meet the requirements of the two institutions with the greatest identified need for student accommodation. This working group could also produce up to date work on affordability of student accommodation across the city and address other issues with student accommodation as and when issues occur. The Council's Annual Monitoring Report will provide an opportunity to feedback issues which the working group has dealt with over the monitoring year and will allow the Council to update the known needs of the institutions²².

iv. Would compliance with criterion (f) be determined on a case by case basis?

45. Criterion (f) regarding rooms and facilities being of an appropriate size for living and studying will be determined on a case by case basis and will be discussed at a pre-application stage. This can be demonstrated by the submission of appropriate information at application stage. As for the question (iii) above, further information may be developed by the working group in order to clarify appropriate unit sizes and facilities.

v. Are the requirements of the final paragraph of the main policy text too onerous in respect of those educational institutions such as specialist schools where students do not necessarily attend full time courses for one academic year? Would the Council's proposed modifications to the policy text (RD/CFM/010) overcome the above concerns?

46. This response should be viewed in the context of the responses to Question 6A.1 (i) in respect of Policy 44: Specialist colleges and language schools and in light of the Council's overall strategy to address student accommodation provision as set out in this statement and in the Council's Further Proposed Modifications document²³. The Council does not consider the requirements of the original final paragraph of the main policy text to be too onerous in respect of those educational institutions such as

²² RM/CFM/010, page 20, paragraph 9.5.

²³ RD/CFM/010.

specialist schools where students do not necessarily attend full time courses for one academic year. The proposed modifications²⁴ to the policy text are soundly based.

47. The student accommodation study found that the non-university institutions make up approximately a third of students: 15,420 out of a total of 46,132 in 2015/16 academic year requiring accommodation in Cambridge²⁵. These students study a very wide range of courses at over 40 different institutions. Within the 15,420 total for non-university institutions, the students were accommodated in 2015/16 academic year as follows:

Table 4: Accommodation used by Non-University Institutions 2015/16²⁶

Type of Accommodation	Number of students
Purpose Built Student Accommodation (PBSA)	4,586
Shared Existing Housing	355
Existing Family Housing: Parental/Guardian Home	5,304
Existing Family Housing: Homestay	4,390
No information available	785
Total	15,420

48. The student accommodation study²⁷ confirms that the non-university institutions house just under a third of students in ‘homestay’ accommodation, and a further third of students in the parental home. In the case of students living in the parental home, these figures are high due to the presence of Cambridge Regional College on the north-eastern edge of the city. The numbers living in shared housing are low, perhaps due to the age of non-university institution students, their length of stay in relation to lease agreements, and their ability to find this form of accommodation prior to their arrival in Cambridge. In relation to PBSA, a number of the non-university institutions use University and College accommodation outside term-time, which allows for efficient and sustainable use of student accommodation. This use of accommodation is predominantly focussed on the summer vacation, with numerous language schools operating in the city in these months. This approach is well established in Cambridge and maintains reasonable accommodation costs for university students, who do not necessarily have to pay accommodation costs for the full financial year, paying on a termly basis or on a nine month lease²⁸.
49. The combination of different forms of student accommodation available for non-university institutions means that the overall need for such institutions to provide their own accommodation is relatively low. The relevant paragraph within the policy confirms that the non-university institutions with courses of less than one academic year are expected to make effective use of existing student accommodation within the city outside term-time and use homestay accommodation. The requirement to deliver

²⁴ RD/CFM/010

²⁵ Table 2: Number of students and accommodation in Cambridge, 2015/16, page 6, RD/CFM/030.

²⁶ The types of accommodation are discussed in paragraph 10 above.

²⁷ Table 2: Number of students and accommodation in Cambridge, 2015/16, page 6, RD/CFM/030.

²⁸ RD/CFM/030, pages 76 – 77, paragraphs 7.7 - 7.8.

PBSA on their own sites recognises both the relatively low need for further accommodation and the other existing pressures on land within the city.

6A.3 Policy 48: Housing in multiple occupation

i. Would the policy have an adverse effect on meeting housing need as it could prejudice people who would be unable to afford to purchase a house in Cambridge but would not have access to affordable housing provision, e.g. university staff?

50. Policy 48 does not seek to prevent Houses in Multiple Occupation (HMO), but to manage their provision. Indeed, paragraph 6.21 of the supporting text of the policy recognises that HMO have a positive role to play within the local housing market. This is further recognised in the Council's Statement of Consultation and Audit Trails document²⁹ which notes that approximately 12.6% of the housing stock in Cambridge is made up of HMO and notes that with high house prices and rents, HMO help to meet a wide range of needs. However, HMO can also have negative impacts: reducing the number of family homes available, impacting on the character of an area and contributing to parking problems.

51. Policy 48 will only apply to large HMO (HMO with more than six unrelated individuals) and seeks to strike a balance between allowing the development of HMO while also seeking to minimise these negative impacts. It seeks to minimise the negative impacts by avoiding an over-concentration of large HMO in one area, by ensuring that there is no harm to residential amenity, by ensuring adequate facilities are provided and by ensuring the site is accessible to sustainable modes of transport as well as shops and services.

52. The Council considers that this balanced approach will continue to allow large HMO to fulfil their role in the Cambridge housing market, while also managing the potential problems associated with them.

ii. Should the wording of criterion (a) be expanded to clarify how the term "over concentration" would be measured or defined?

53. The Council recognises there is potential for over-concentration, either in geographical terms by street or within a specific Council ward or in percentage terms, which the policy seeks to control. Indeed, the particular arrangement of a street might mean that a particular percentage of HMO in one area creates a problem that would not be created by the same percentage of HMO in another area. Furthermore, the Council considers that only restricting HMO levels in particular wards would simply have the unintended consequence of moving the issue to other wards within the city. The effects of over-concentration can include increased levels of car parking, increased noise and disturbance, pressures on services, including management of the collection of waste, and impacts on community cohesion.

²⁹ RD/Sub/C/080, page 419, paragraph 108.

54. The Council considers that decisions on whether there is an over-concentration could be made on a case-by-case basis by decision makers based on consultation with the Council's Environmental Services, who are responsible for licensing larger HMO. The factors which could be taken into account include the impact that existing HMO in the area are having on living conditions and parking.
- iii. **Should the final sentence of paragraph 6.20 be expanded to clarify in what respects smaller houses in multiple occupation would be treated as similar to dwellinghouses in planning terms?**
55. The first bullet of paragraph 6.20 explains that a dwelling can change use from Use Class C3 to C4 without planning permission. It is for this reason that the Council does not consider it reasonable to apply any further restrictions to small HMO (Use Class C4). The Council considers that this paragraph is clear in explaining the reasons for this, and that how this operates is also clear. The purpose of the final sentence of paragraph 6.20, for the avoidance of doubt, is that the provision of new C4 HMO will be considered against the same policies as C3 accommodation.

CC6B Affordable housing, Specialist Housing and Residential Moorings

6B.1 Policy 45: Affordable housing and dwelling mix

- i. **Is the policy consistent with the Written Ministerial Statement, November 2014 (as amended in March 2015) [WMS]? If not, are there any local circumstances that would justify a departure from the WMS, and additionally, could it be fully demonstrated that an alternative level of affordable housing provision could be justified on viability grounds?**
56. Policy 45 is not consistent with the Written Ministerial Statement (WMS) of November 2014 (as amended in March 2015). The PPG sets a ten unit threshold on such obligations, but also allows for a lower threshold of five units or less in designated rural areas.³⁰
57. The Court of Appeal decision on *West Berkshire District Council and Reading Borough Council v Department for Communities and Local Government*³¹ upheld the WMS as a matter of law. However, the Court also held that local planning authorities can take into account local circumstances in the formulation of policy and material considerations may justify a departure from the WMS.
58. The objective of the WMS was to tackle the disproportionate burden of developer contributions on small scale developers³² with the aim of increasing housing supply. The Council considers that the local circumstances in Cambridge are sufficient to justify an affordable housing threshold lower than that included in the Written Ministerial Statement and now comprising national planning policy. Policy 45 requires off-site financial contributions towards affordable housing for developments of 2 to 9

³⁰ Paragraph Reference: 23b-031-20161116, RD/NP/020.

³¹ RD/H/790

³² Written Ministerial Statement, November 2014.

units and provision of on-site affordable housing on developments of 10 and above. The Council's evidence base documents on viability confirm that the policy is viable, is not a barrier to development, and is not a disproportionate burden on developer contributions given the high value of development in Cambridge. The Council also has a large current and unmet affordable housing need, which this policy can go some way towards meeting.

59. In terms of viability, the Council originally assessed the viability implications of the policy on developments³³ prior to submitting the Local Plan for examination. This viability work included assessment of schemes providing between 2 and 14 units and 15 or more units. Cambridge City Council and South Cambridgeshire District Council then commissioned the Local Plans Viability Update³⁴ as part of the Proposed Modifications work in 2015/16. This update was conducted at the time of the Court of Appeal process regarding West Berkshire District Council and Reading Borough Council v Department for Communities and Local Government³⁵. At that time, the High Court's decision had temporarily stopped the Government's implementation of the Written Ministerial Statement in respect of affordable housing thresholds. The study addressed all of the Council's proposed affordable housing thresholds and included an inflationary rise in the build costs of dwellings³⁶; and found that the "*net cumulative impact of changes in market conditions, development costs and national and local policies is positive*"³⁷. The Council considers that the provision of off-site affordable housing contributions for 2 to 9 unit schemes and on-site affordable housing for 10 unit schemes and above in lower-level housing value levels is therefore justified. It is considered that the viability implications of the policy will not impact disproportionately on the developability or deliverability of housing developments in Cambridge.
60. In addition, the methodology for calculating financial contributions in Cambridge on sites of 2 to 9 dwellings and 10 or more dwellings is included in Appendix 2 of the draft Affordable Housing SPD³⁸. This methodology was informed by Dixon Searle Partnership's 'Considering Affordable Housing Financial Contributions – Small sites calculations' document (March 2014)³⁹ and based on current market trends. The purpose of providing these calculations within the draft SPD is to ensure that they can be updated to reflect the current market trends (including reassessment of land values, build costs, reasonable profit margins etc) when needed to provide further flexibility to Policy 45: Affordable housing and dwelling mix and to ensure that a disproportionate burden of developer contributions is not placed upon small scale developers. It has been demonstrated that development is viable with Policy 45's thresholds and that the high value of development in Cambridge is such that the policy will not place a disproportionate burden on smaller developers or prove a disincentive to development being brought forward.

³³ Community Infrastructure Levy Viability Assessment (February 2013) (RD/T/200), SHLAA and Potential Site Allocations High Level Viability Assessment (RD/Strat/150) and Supplementary Report, 'Small Sites Affordable Housing Viability' (June 2013) (RD/H/320).

³⁴ Dixon Searle Partnership, October 2015, RD/MC/090.

³⁵ RD/H/790

³⁶ RD/MC/090, page.29, paragraph 2.4.13.

³⁷ RD/MC/090, page 35, paragraph 3.2.2.

³⁸ RD/H/330, pages 29-35.

³⁹ <https://www.cambridge.gov.uk/affordable-housing-spd>

Need

61. The need for affordable housing has been previously established through the Councils' written statement concerning Matter 3 – Housing Need, this demonstrated that Cambridge has a significant need for affordable housing. Evidence as of 2013/14 and illustrated in table 9 (Appendix 4) of the Matter 3 statement identified an affordable housing need within Cambridge of 10,402 when taking into account need minus projected supply. Furthermore the Council's objectively assessed need: Further Evidence⁴⁰ document notes that the Council will be unable to meet all of this affordable housing need within the plan period. It is also noted that Planning Inspectors have been cautious in recommending uplifts to overall housing targets in response to affordable need⁴¹. Applying reasonable financial contributions to 'small sites' through Policy 45: Affordable housing and dwelling mix will enable the Council to assist in bridging the gap between affordable housing need and objectively assessed housing need in general. Moreover, to lose small sites as a source of supply will result in that gap widening further.
62. Cambridge's Annual Monitoring Report 2016 also solidifies the need for affordable housing in the Cambridge area. Figures related to house prices and wage levels produced by Hometrack suggest that the ratio, or multiplier, of median wages to median house prices in the city, was 12.8% in March 2016. The ratio of lower quartile house price to lower quartile earnings was 18.8 in March 2016⁴². In addition, in Cambridge the average house price has increased by 28% from March 2014 to September 2016, an equivalent of £109,972, making the average house price £498,248⁴³.
63. Recent statistics from the Bedfordshire Pilgrims Housing Association (BPHA) Help to Buy Housing Register also highlight that there are 584 households living in and wanting to remain in Cambridge and 724 households working in and wanting to live in Cambridge as at May 2016^{44,45}. Many of these are likely to be in affordable housing need. The Council's Homelink data also shows 2,088 families/applicants on the housing needs register⁴⁶ (March 2016).

⁴⁰ RD/MC/040, page 32

⁴¹ RD/MC/040, paragraph 4.12, page 33.

⁴² RD/AD/490, page 9, paragraph 2.22.

⁴³ Cambridge City Council: Key Statistics – Strategic Housing (December 2016) – Key indicator MH1
<https://www.cambridge.gov.uk/housing-research>

⁴⁴ Cambridge City Council: Key Statistics – Strategic Housing (December 2016) – Key indicator IH1
<https://www.cambridge.gov.uk/housing-research>

⁴⁵ Replaces previous data from Orbit Homebuy register. Shows applicants applying for some or all of the available Help to Buy products, including shared ownership, shared equity, Help to Buy equity loans, intermediate rents, other sub-market rents/ sales, etc. Includes applicants living in Cambridge, and wanting to live in Cambridge, regardless of current place of work. Some applicants will have listed Cambridge as just one of their districts of choice.

⁴⁶ Cambridge City Council: Key Statistics – Strategic Housing (December 2016) – Key indicator HL1
<https://www.cambridge.gov.uk/housing-research>

64. In March 2016, a Lloyds Bank Press release⁴⁷ also listed Cambridge as the fifth least affordable city in the UK. Table 16 of the Centre for Cities Outlook 2017⁴⁸ demonstrates that based on 2016 average house prices and yearly wages Cambridge is the third least affordable City in the Country behind Oxford and London. These figures are not directly comparable to the Hometrack data, but are instead based on data from the Lloyds Banking Group's own housing statistics database, ONS data on average earnings, and Land Registry data. They do, however, illustrate the deficit of affordable housing provision within the city.

Delivery

65. The Council's current affordable housing threshold as set out in the Cambridge Local Plan 2006⁴⁹ at Policy 5/5: Meeting Housing Needs was for 40% provision of affordable housing on developments of 15 units or more or 0.5 hectares. Since the adoption of the current Local Plan, affordability has worsened in the city, leading to the development of the approach set out in the emerging Local Plan for a significantly lower threshold.
66. Looking back at housing delivery over the past 14 years (2002/03 to 2015/16) and analysing housing completions data, the Council has identified that 1,256 dwellings have come forward on developments between 2 and 10 dwellings. This averages 89.7 dwellings per year.
67. Of these completions, 1,176 dwellings (or 84 per year on average) were completed on developments of 2 to 9 dwellings. The Council, through Policy 45: Affordable housing and dwelling mix, is currently proposing 10% affordable housing contributions from these sites. This would equate (roughly) to an additional 8.4 affordable dwellings being provided through financial contributions per year. In the Cambridge context, this represents a valuable and important contribution.
68. Within Policy 45: Affordable housing and dwelling mix, the Council has also put forward a 25% affordable housing requirement on developments of 10 to 14 dwellings. Developments of 10 to 14 dwellings provided 461 residential units between 2002/03 and 2015/16 equating to 32.9 dwellings per year on average. Again, this is an important contribution to affordable housing provision in Cambridge. If the 25% affordable housing requirement were applied to these developments, a further 8.2 affordable housing units could be provided per annum.
69. There are currently 15 years of housing completions remaining in the plan period for the emerging Local Plan (2016/17 to 2030/31). It is likely that any housing completions for the 2016/17 year will have been approved under the Cambridge Local Plan 2006. Policy 45: Affordable housing and dwelling mix is likely to influence the final 14 years of the plan period (2017/18 to 2030/31). If the findings discussed above were to be projected forward for the remaining plan period, an additional 16.63

⁴⁷ www.lloydsbankinggroup.com/globalassets/documents/media/press-releases/lloyds-bank/2016/affordable-cities-2016-final.pdf

⁴⁸ <http://www.centreforcities.org/publication/cities-outlook-2017/>

⁴⁹ RD/AD/300

dwellings per annum or 233 affordable housing units (16.63 x 14 years) could be delivered during the remaining plan period.

70. Whilst the Council is aware that decisions to deviate from the WMS threshold have been decided for and against the proposal, it is of note that during the High Court proceedings regarding West Berkshire District Council and Reading Borough Council v the Department for Communities and Local Government⁵⁰ the Minister gave a clear indication that decision takers and policy makers may deviate away from the Written Ministerial Statement if local circumstances could justify such a departure. As recorded in the Court of Appeal judgment, it was said in court on the Minister's behalf that;

“(iii) In the determination of planning applications the effect of the new national policy is that although it would normally be inappropriate to require any affordable housing or social infrastructure contributions on sites below the thresholds stated, local circumstances may justify lower (or no) thresholds as an exception to the national policy. It would then be a matter for the decision-maker to decide how much weight to give to lower thresholds justified by local circumstances as compared with the new national policy;

(iv) Likewise if in future an LPA submits for examination local plan policies with thresholds below those in the national policy, the Inspector will consider whether the LPA's evidence base and local circumstances justify the LPA's proposed thresholds. If he concludes that they do and the local plan policy is adopted, then more weight will be given to it than to the new national policy in subsequent decisions on planning applications.”

71. This is reflected in the Planning Inspectorate's letter to the London Borough of Richmond dated March 2017 albeit in the context of planning decision-taking:

“The correct approach, if minded to allow an appeal in such circumstances, would be for an Inspector to start with the development plan and any evidence presented by the LPA supporting the need for an affordable housing contribution, establish whether the proposal is in conflict with those policies if no contribution is provided for, and, if there is conflict, only then go on to address the weight to be attached to the WMS as a national policy that post-dates the development plan policies. An Inspector would then be entitled to find in the balancing exercise that the WMS outweighs the development plan policies, as opposed to discounting the development plan's weight at the outset.”

72. Finally, given the current lack of Local Plan examples, the Council considers that it is relevant to draw some parallels and make reference to applications determined under section 78 of the Town and Country Planning Act 1990 to ascertain what 'evidence base and local circumstances' are being considered by Planning Inspectors in the context of the WMS.

⁵⁰ RD/CSF/240

**Matter CC6: Maintaining a Balanced Supply of Housing
Statement by Cambridge City Council
March 2017**

- In a recent appeal decision⁵¹ for Wanderdown, East Sussex within Brighton and Hove's administrative area, Inspector L Gibbons found in favour of the application of affordable housing provision on small sites based on high house prices, average costs of housing and household incomes and a physically constrained location.
- In her consideration of a more recent appeal⁵² for the erection of first floor rear extension and mansard roof extension to provide 2 x 1 bed self-contained flats in Islington on 23 January 2017, Inspector Caroline Mulloy found in favour of the Local Planning Authority on the grounds that:

“The Council’s statement sets out updated information relating to housing need and affordability in the Borough and the significance of small sites to the Borough. The information draws on the evidence base assembled to inform the Mayor’s Housing Strategy which shows that the average house price of a residential property in Islington has increased by 56% since 2007 and at June 2016 was £657,755, amongst the highest in England and Wales. Median and lowest quartile incomes are both around 16 times below the median and lowest quartile house prices which represents a considerable affordability gap.”

ii. Has the case for 40% affordable housing requirement for development for 15 dwellings or more been conclusively demonstrated in respect of the lower value levels as described in Appendix 2 of the Draft Affordable Housing Supplementary Planning Document which will provide guidance on viability testing?

73. Yes, the Council considers that 40% affordable housing requirement is viable and developable on schemes of 15 or more dwellings even when applying lower value housing levels. This is substantiated by work undertaken by Dixon Searle Partnership for the Council as part of the evidence base for the Local Plan⁵³. The suite of documents included:

- Cambridge City Council Local Plan – Community Infrastructure Levy Viability Assessment (February 2013)⁵⁴;
- Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment (May 2013)⁵⁵; and
- Cambridge City Council Local Plan – Small Sites – Affordable Housing Viability (June 2013)⁵⁶.

74. Value levels in the viability documents listed above are mirrored in Appendix 2 of the Council's draft Affordable Housing SPD⁵⁷. The SHLAA and Potential Site Allocations

⁵¹ APP/Q1445/W/16/3147419

⁵² APP/V5570/W/16/3161073

⁵³ Cambridge City Council Community Infrastructure Levy (CIL) Viability Assessment (February 2013) (RD/T/200) and Supplementary Report, 'Small Sites Affordable Housing Viability' (June 2013) (RD/H/320).

⁵⁴ RD/T/200

⁵⁵ RD/Strat/150

⁵⁶ RD/H/320

High Level Viability Assessment (May 2013)⁵⁸ used the value levels in assessing the viability of sites for allocation in the Plan.

75. Paragraph 22 of the Council's Community Infrastructure Levy Viability Assessment⁵⁹ in particular justifies the use of 40% affordable housing on developments of 15 or more despite potential variations in value levels across the city and notes that this does not affect the viability of the development:

"In terms of affordable housing, with 40% used a base CIL viability assumption, and explored across the range of scenarios and value levels, as well as sensitivity tested at variant levels, the process confirms that this (but not a higher %) remains an appropriate target given the high level of need."

76. While Appendix 2 of the draft Affordable Housing SPD uses the recommended value levels set out in the suite of viability documents, the SPD also commissioned further evidence to inform the financial calculation methodology which returned the same results and value levels for Cambridge. These can be found in the Considering Affordable Housing Financial Contributions – Small sites calculations document (March 2014)⁶⁰ used to inform the creation of Appendix 2 of the draft Affordable Housing SPD.

iii. Does the policy provide sufficient flexibility to take account of changing market conditions over time as required by third bullet point of paragraph 50 of the National Planning Policy Framework?

77. The Council considers that paragraph 6.4 of the supporting text to the policy confirms that where a developer considers meeting affordable housing targets to be unviable, robust evidence would need to be provided in the form of an independent viability appraisal. This allows for flexibility to address changing market conditions. This approach is consistent with paragraph 50 of the NPPF.

78. The PPG notes that "Planning obligations must be fully justified and evidenced. Where affordable housing contributions are being sought, planning obligations should not prevent development from going forward"⁶¹. In addition, the PPG states "*Where local planning authorities are requiring affordable housing obligations or tariff style contributions to infrastructure, they should be flexible in their requirements. Their policy should be clear that such planning obligations will take into account specific site circumstances.*"⁶²

79. The provision of an independent viability appraisal as stipulated in paragraph 6.4 of the policy allows for site specific circumstances to be assessed and taken into account in

⁵⁷ RD/H/330

⁵⁸ RD/Strat/150

⁵⁹ RD/T/200, page viii.

⁶⁰ <https://www.cambridge.gov.uk/affordable-housing-spd>

⁶¹ Paragraph Reference: 23b-004-20150326, RD/NP/020.

⁶² Paragraph Reference: 23b-006-20140306, RD/NP/020.

the determination of planning applications where it is believed that affordable housing requirements will affect the delivery or viability of the site.

80. Furthermore, Appendix 2 of the Council's draft Affordable Housing SPD⁶³, which provides the calculation methodology for affordable housing financial contributions, is designed to be updated periodically (as is Appendix 6) to reflect changing market conditions. Appendix 2 was created through guidance, consultation and advice provided by the Council's viability consultants, Dixon Searle Partnership⁶⁴. Flexibility was also included in the calculation to reflect differing value levels on a ward based level for smaller sites. Enabling the reflection of current market conditions within the SPD rather than the policy allows adjustment to be made in line with market fluctuations.
- iv. Should the reference in the fifth paragraph of the policy to exceptional circumstances make clear that such circumstances would have to be demonstrated through viability testing?**
81. The Council considers that paragraph 6.4 of the supporting text to the policy makes it sufficiently clear that robust evidence would need to be provided in the form of an independent viability appraisal. This paragraph also confirms that negotiations will need to take place between the Council and the developer to ensure clarity about the particular circumstances which have given rise to the development's reduced viability or non-viability, either on an open book valuation or involving an independently commissioned assessment using the Homes and Communities Agency's Development Appraisal Tool⁶⁵ or other equivalent tools agreed with the Council in advance of assessment. Further guidance on viability appraisal can also be found in Appendix 3 – Checklist for Viability Assessment Review, Indicative Information Requirements in the draft Affordable Housing SPD⁶⁶.
- v. Does the policy take account of the planning policy guidance relating to Starter Homes which were introduced by the Written Ministerial Statement in March 2015?**
82. The Housing and Planning Act 2016 includes primary legislation for Starter Homes. It outlines the framework within which Starter Homes will be delivered but the details will be set via regulations. The Department for Communities and Local Government published Starter Homes Regulations: Technical Consultation in March 2016 and the Government's Housing White Paper *Fixing our Broken Housing Market* (February 2017) makes reference to amendments to the NPPF in respect of Starter Homes. The Council understands that these amendments are likely to occur later this year. As such, no further modifications have been proposed to the Local Plan to reflect the discussion of Starter Homes in the Housing White Paper.

⁶³ RD/H/330

⁶⁴ Considering Affordable Housing Financial Contributions – Small sites calculations document (March 2014)

<https://www.cambridge.gov.uk/sites/default/files/documents/Cambridge%20CC%20AHFinancialContributions%20Report%20DSP%20March%2014%20Final.pdf>

⁶⁵ The Homes and Communities Agency's Development Appraisal Tool is now available at:

<https://www.gov.uk/government/collections/development-appraisal-tool>

⁶⁶ RD/H/330.

83. Policy 45 (as amended as part of the Proposed Modifications) takes into account the Written Ministerial Statement (WMS) of March 2015 and the PPG relating to Starter Homes. The PPG confirms that the Starter Homes Exception Sites policy enables applications for development for Starter Homes on under-used or unviable industrial and commercial land that has not been currently identified for housing⁶⁷. Paragraph 6 of Policy 45 (as amended) references Starter Homes and their function as affordable housing in line with the Government's definition. Starter Homes are therefore exempted from affordable housing contributions by the following modification:

"All sites** including employment related housing will be required to make affordable housing provision in line with the thresholds and percentages set out above.

** Except for Starter Homes Exception Sites

84. The Council proposes an additional modification to include a glossary definition of Starter Homes Exceptions Sites for clarity. This additional modification can be found in Appendix 2 to this statement.
85. Further paragraphs of the PPG note that local planning authorities should put in place planning obligations to ensure that Starter Homes are offered for sale at a minimum of 20% below the open market value of the property and that appropriate restrictions should be in place to ensure that Starter Homes are not resold or let at their open market value for 5 years following the initial sale⁶⁸. The Council would put in place planning obligations on relevant proposals, as necessary.
- vi. Can the arrangement for the provision of affordable housing in order to meet employment needs as set out in paragraph 6.7 of the policy be fully justified?**
86. While employment related housing would not fall within the NPPF's definition of affordable housing and is not intended to be affordable housing as defined in Table 6.1 of the emerging Cambridge Local Plan, this type of housing would accommodate people employed in the city, who cannot easily access homes on the open market. This is intended to assist employers in allowing employees to live in the city and is derived from the adopted Cambridge Local Plan, which has historically met the needs of particular institutions in Cambridge, such as the University of Cambridge at North West Cambridge. It is not intended to represent a substitute for affordable housing.
87. The provision of affordable housing to meet employment needs is expanded upon in the draft Affordable Housing SPD⁶⁹. Employment related housing would only be provided in circumstances where it can be substantially evidenced that the lack of such housing could adversely affect the recruitment and retention of staff. The draft Affordable Housing SPD provides further clarification on where such accommodation would be considered acceptable. Any such related housing would represent a limited number of dwellings and not detract from the general employment use of the site,

⁶⁷ Paragraph Reference: 55-001-20150318, RD/NP/020.

⁶⁸ Paragraph References: 55-003-20150318 and 55-005-20150318 respectively, RD/NP/020.

⁶⁹ RD/H/330, pages 19 – 20, paragraphs 6.3 – 6.13)

examples of schemes which would qualify under employment related housing would be a caretaker or teacher's flat.

6B.2 Policy 47 Specialist housing

i. Should paragraph 6.16 also include respite, rehabilitation and convalescent accommodation in the interests of clarity?

88. The Council considers it appropriate to include reference to respite, rehabilitation and convalescent accommodation in paragraph 6.16 of the supporting text to Policy 47: Specialist Housing. Appendix 2 of this hearing statement contains a modification to this effect.

89. Additionally, the Council has proposed a number of further additional modifications to Policy 47: Specialist housing and its supporting text, and Appendix K: Marketing, Local Needs Assessment and Viability Appraisal in Appendix 2 to this statement.

6B.3 Policy 54: Residential Moorings

i. Should the policy be based on an assessment of the potential need for residential mooring spaces during the lifetime of the Plan?

90. The NPPF at paragraph 159 requires local planning authorities to have a clear understanding of needs in their area. This includes identifying the scale and mix of housing and the range of tenures likely to be needed over the plan period which addresses the need for all types of housing, including needs of different groups in the community. However, the NPPF does not refer specifically to residential moorings, which are considered to represent a lifestyle choice, rather than comprising a type of "housing" for which there is a "need" and, as such, which must be positively planned for by the NPPF.

91. However, the Council recognises it has a statutory duty in its capacity as a local housing authority to assess and understand the accommodation needs of people residing or resorting to their district given recent amendments to the Housing Act 1985⁷⁰. The Council considers Policy 54 on residential moorings to be a permissive policy sufficient to address the provision of moorings for the time-being.

92. The Council's objectively assessed housing need is derived from evidence in the Cambridge Sub Region Strategic Housing Market Assessment (SHMA)⁷¹ and the Objectively Assessed Housing Need Further Evidence report prepared by Peter Brett Associates in November 2015⁷². The SHMA considers the full market and affordable housing needs of the Housing Market Area as part of an integrated approach to future population, housing and economic needs, including forecast job numbers in

⁷⁰ In 2016, this statutory duty was amended in Section 8 of the Housing Act 1985 through Section 124 of the Housing and Planning Act 2016, to include a specific requirement for authorities to consider the needs of people residing or resorting to the district with respect to the provision of caravan sites, and places on inland waterways where houseboats can be moored.

⁷¹ Cambridge Sub Region Strategic Housing Market Assessment (SHMA) (May 2013) (RD/Strat/090)

⁷² RD/MC/040

accordance with paragraphs 158 and 159 of the NPPF. It is supported by the Population, Housing and Employment Technical Report⁷³. Together, the SHMA and the Objectively Assessed Housing Need Further Evidence report provide a robust basis to underpin the provision of new housing in the Local Plans. Further information on the Council's approach to assessing objectively assessed housing need is set out in the Councils' Matter PM1 Hearing Statement.

93. The Government issued draft guidance in March 2016 on how to carry out an assessment in relation to caravan site and houseboat needs. This lays out some basic principles, although states that the exact approach taken may vary depending on local circumstances. The draft guidance has not been updated or finalised since it was first published. In carrying out a needs assessment, it recommends close engagement with the communities throughout the process, and suggests some potential sources of data. It also recommends a specialist survey and/or some other qualitative research, and states that authorities will need to consider co-operating across boundaries, both in carrying out assessments and delivering solutions. The assessment should identify accurately the current number of households, and current and future level of need for caravan and houseboat accommodation in the area.
94. The production of a needs assessment in relation to houseboats has been discussed with neighbouring local authorities in the context of the SHMA, commissioned through the Cambridge sub-Regional Housing Board. Subject to the agreement of partner authorities, it is anticipated that assessment work on the needs of those dwelling on houseboats will be undertaken in due course.
95. The Council has a good understanding of current needs for residential moorings in Cambridge. All moorings currently provided by Cambridge City Council are on-line moorings, due to the historic and incremental nature of their development rather than as a part of a planned process.
96. The moorings within Cambridge take a range of forms:
 - Short-term temporary moorings for up to 6 vessels located at areas D1 Jesus Green and K1 Stourbridge Common;
 - Visitor moorings for up to 10 vessels located at areas C Jubilee Gardens and E2 Midsummer Common;
 - Commercial moorings for three vessels operate based on commercial leases at area C Jubilee Gardens. These are managed by the Council's Property Services and are outside the scope of the residential moorings policy.
 - Residential moorings for up to 70 vessels in seven locations at areas B Jubilee Gardens, D2 Jesus Green, E1 Midsummer Common, G and H Midsummer Common, K2 and M Stourbridge Common.
97. The Council has a waiting list for residential moorings. There are currently approximately 200 applicants on the list, made up of approximately 50 wide beam vessels and approximately 150 narrow beam vessels. The people on the waiting list

⁷³ Population, Housing and Employment Forecasts Technical Report (April 2013) (RD/Strat/080)

are contacted annually through a review process to determine whether they are still interested and eligible to be granted a mooring licence should one become available.

98. The Council understands that the Inland Waterways Association⁷⁴ (2015) advises that:
- ‘The aim should normally be to reduce on-line moorings by the creation of new moorings off-line. Generally, new permanent on-line moorings should be resisted.’*
99. The Council will continue to monitor and manage on-line moorings within Cambridge and is also seeking to deliver off-line moorings. The allocation of land at Site RM1: Fen Road and land referred to in Policy H/6 of the South Cambridgeshire Local Plan allow for the delivery of off-line moorings to address the ongoing need for moorings in Cambridge and South Cambridgeshire in advance of further work being undertaken on the needs of people residing or resorting to the district with respect to places on inland waterways where houseboats can be moored.
100. In the intervening time between the completion of the needs assessment for those residing on Cambridge’s waterways and the production of the next Local Plan for Cambridge and South Cambridgeshire (for which work is due to commence in 2019), it is considered that the combination of a permissive criteria-based policy on residential moorings and the allocation of land for off-line moorings at Site RM1 Fen Road represents a reasonable approach.
- ii. Should the Plan be supported by a residential and visitor mooring strategy?**
101. The Council does not consider that there is a need for a specific residential and visitor mooring strategy to support the policy. The Council has already produced guidance on the management and future provision of moorings in the form of a River Moorings Policy (RMP), which is proposed to run from April 2017 to March 2023. The RMP will be presented at the Council’s Strategy and Resources Committee on 20 March 2017⁷⁵. The Council will update the Inspectors on the progress of the RMP prior to the Matter CC6 hearing sessions.
102. The RMP is not specifically a planning instrument, hence it is not referred to in Policy 54. The purpose of the RMP is to enable the Council to manage the provision of its mooring facilities, as the riparian owner of the land adjacent to the river bank at defined locations within the River Cam corridor. The principal responsibility of the Council is to ensure the safe, responsible and proportionate use of its areas of riverbanks where mooring is permitted and in furtherance of its statutory duties and responsibilities where appropriate. Most importantly, the Council must work in partnership and with due adherence to the role and responsibilities of the Conservators of the River Cam as the statutory navigation authority for the River Cam. The Conservators of the River Cam have powers to regulate navigation on the River Cam by a range of byelaws under Section 25 of the River Cam Conservancy Act 1922. The new RMP updates, where appropriate, the existing Mooring Management Policy

⁷⁴ IWA Policy on Mooring on Navigable Waterways, Inland Waterways Association, 2015.

⁷⁵ <http://democracy.cambridge.gov.uk/ieListDocuments.aspx?CId=159&MId=3084&Ver=4>

adopted in October 2010. This revised approach aims to reflect the considerable operational changes in the intervening period since the 2010 policy was adopted.

103. The River Cam provides an extremely important and valuable natural asset within the heart of Cambridge City Centre, adding to the value of the locality in a number of ways, ranging from the natural environment through to the commercial benefits realised from tourism and leisure activities. Permitted mooring areas extend on both banks of the river from Jesus Green through to Stourbridge Common. Although the primary purpose of the RMP is to ensure the effective provision and management of the moorings provided by the Council, it also considers the wider benefits and values of the river for a range of functions and activities.
104. These include:
- The value of the River Cam as a blue corridor connecting a pattern of biodiverse, historic and recreational green infrastructure;
 - Hosting a range of river-borne and river-related active leisure pursuits including rowing, punting, events, visitor cruises, recreational boating and angling;
 - Provision of a safe and accessible traffic-free towpath for walkers, runners and cyclists which connects the city in an environmentally sustainable way;
 - Providing a high-quality visitor and tourism attraction;
 - Providing a variety of on-line moorings for visitor and residential moorings.
105. One of the primary aims of the Council's RMP is to provide a mechanism to advise interested parties about the way in which the Council will discharge its various functions and responsibilities for moorings.
106. Those identified as having an interest in the mooring policy include current and future moorers, visiting boaters, commercial boat operators, stakeholders, organisations and individual members of the community who have an interest in the river or are directly affected by activities which take place within the river and its environs. The RMP recognises that the area of the River Cam covered by the policy is becoming increasingly popular for a variety of activities and is now one of the busiest stretches of inland waterway within the United Kingdom, and the activities of the Council need to reflect the changing demands on the river system.
107. Several factors which influence the RMP have been identified by river users, stakeholders, local residents and the Council. These include increasing demand for visitor and longer term licensed mooring locations, achieving a balance for potentially competing uses between mooring and navigating boats and other river users such as rowing clubs, angling organisations and commercial operators such as punting. Research undertaken by the Conservators of the River Cam has, for example, indicated that in comparison to other waterways the River Cam had a crowded water space with over 1,000 craft in a 14 mile stretch of river, giving a density per mile of almost six times that of other East Anglian waterways. Similarly, the research indicated that rowing had increased by 148% in the last 20 years on the River Cam to approximately 3,000 participants.

108. In recent years, the Council has conducted several consultation exercises to gauge the views, ideas and opinions of a wide range of organisations, representative bodies, individual boat owners, residents and members of the wider community in recent years. Recent consultations include; in February 2015, when the Council proposed a policy for control of visitor moorings, and between November 2016 and January 2017, when it completed a consultation exercise in relation to a number of revised policy considerations.
109. The development of the RMP has taken account of the views expressed by consultees and the RMP has, where appropriate, incorporated these into the revised proposals. In terms of future performance monitoring of the RMP, the Council will produce an annual report to assess the operation of the policy and make any changes to operational management as required. Where any more major issues arise, which would require a more fundamental change to the agreed policy objectives these would be identified and reported through the necessary Council channels for resolution.
110. The Council will also organise and support an annual stakeholder's forum to provide an opportunity for those with either a direct interest in the moorings or other aspects of the river to feedback their views, comments and ideas to facilitate the ongoing implementation of the policy. This will have the benefit of ensuring that any issues or opportunities arising can be considered at regular intervals.
111. The RMP is due to remain in place for a period of five years at which point it will be reviewed. However, should unforeseen or external circumstances require fundamental changes in direction, the RMP will be reviewed prior to the anticipated end date of 2023.

6B.4 Site RM1: Fen Road

i. Is it proposed that this site will be developed concurrently with the adjacent site referred to in Policy H/6 of the South Cambridgeshire Plan?

112. Yes, it is proposed that this site will be developed concurrently with the adjacent site referred to in Policy H/6 of the South Cambridgeshire Plan. The two allocations within the two Councils' administrative areas are owned by the same landowner.

6B.5 Site R17: Mount Pleasant House, Mount Pleasant

i. Would the Council's proposed modifications to the policy text (RD/CFM/010) in respect of the change from 50 dwellings to 270 student rooms provide a more appropriate and sustainable use for this site?

113. This main modification is proposed as a result of discussions with the landowners to bring forward development on the Mount Pleasant House site (Site R17). The landowner has confirmed that mainstream residential accommodation will not be deliverable on these sites and that student accommodation is being pursued. In the case of Mount Pleasant House, a planning application (16/1389/FUL) was approved subject to completion of a S106 agreement at the Council's Planning Committee on 1 February 2017. The application sought approval for demolition of the existing office

building and removal of the 145 associated car parking spaces (use class B1a) and construction of College accommodation (comprising 243 en-suite rooms and 24 studios), landscaping and access arrangements (use class sui generis).

114. This main modification is in keeping with the requirements for plan-making in that it is positively prepared, justified and effective. This allocation is deliverable for student accommodation. On the information which has now been provided, the allocation is no longer deliverable as mainstream housing. As such, the modification seeks to provide an allocation which, on all of the information presently available, is deliverable on the site.
115. Residential allocations within Cambridge remain vitally important in meeting the city's objectively assessed need for homes. However, the site proposed for a change in allocation from residential to student accommodation has very specific circumstances, in that it is very well located to meet the known student accommodation needs of a number of Colleges of the University of Cambridge. It lies in close proximity to a number of existing main College sites, which provide a range of services to their students, particularly St Edmund's College.
116. The allocation of the site for student accommodation would have positive effects on the use of the local highway network as students are not normally permitted to keep cars in Cambridge. The site lies in a conservation area and offers opportunities for significant improvements to the public realm and private spaces visible from the highway. One way in which these improvements will be delivered is through a reduction in the number of surface parking spaces on the site. In terms of reasonable alternatives for development of these sites, the Council is aware that the landowner is not going to bring the site forward for residential development as it is considered that such development is not deliverable. By balancing the retention of the significant majority of residential allocations in the Local Plan, while allowing the allocation to change to student accommodation, this addresses both objectively assessed need for homes and the known needs for increases in accommodation for growth in the future resident student population, which can otherwise impact on the wider housing market. As such, it is considered that this represents the most appropriate and sustainable use for this site.

6B.6 Site U1: Old Press/Mill Lane

- i. **Would the Council's proposed modifications to the policy text (RD/CFM/010) in respect of the change from up to 150 dwellings to an indicative capacity of 350 student rooms provide a more appropriate and sustainable use for this site?**
117. This main modification is proposed as a result of discussions with the landowners to bring forward development on the Old Press/Mill Lane site (Site U1). The landowner has confirmed that mainstream residential accommodation will not be deliverable on these sites and that student accommodation is being pursued alongside other uses referred to in Policy 25: Old Press /Mill Lane Opportunity Area and its supporting text.

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Pre-application discussions are currently underway in respect of the site with landowners, the University of Cambridge and a number of Colleges.

118. This main modification is in keeping with the requirements for plan-making in that it is positively prepared, justified and effective. This allocation is deliverable for student accommodation. On the information which has now been provided, the allocation is no longer deliverable as mainstream housing. As such, the modification seeks to provide an allocation which, on all of the information presently available, is deliverable on the site.
119. Residential allocations within Cambridge remain vitally important in meeting the city's objectively assessed need for homes. However, the site proposed for a change in allocation from residential to student accommodation has very specific circumstances, in that it is very well located to meet the known student accommodation needs of a number of Colleges of the University of Cambridge. It lies in close proximity to a number of existing main College sites, which provide a range of services to their students, particularly Pembroke, Darwin and Queens' Colleges.
120. The allocation of the site for student accommodation would have positive effects on the use of the local highway network as students are not normally permitted to keep cars in Cambridge. The site lies in a conservation area and offers opportunities for significant improvements to the public realm and private spaces visible from the highway. One way in which these improvements will be delivered is through a reduction in the number of surface parking spaces on the site. In terms of reasonable alternatives for development of these sites, the Council is aware that the landowner is not going to bring the site forward for residential development as it is considered that such development is not deliverable. By balancing the retention of the significant majority of residential allocations in the Local Plan, while allowing the allocation to change to student accommodation, this addresses both objectively assessed need for homes and the known needs for increases in accommodation for growth in the future resident student population, which can otherwise impact on the wider housing market. As such, it is considered that this represents the most appropriate and sustainable use for this site.

CC6C Technical Standards, Protection of Garden Land and Flat Conversions

6C.1 Policy 50: Residential space standards

- i. **Do the internal residential space standards set out in the policy accord with the Technical housing standards – nationally described space standard (THS) introduced by the Written Ministerial Statement in March 2015?**
121. Yes, the Council has proposed modifications to the residential space standards within the submitted Policy 50: Residential Space Standards with the nationally described space standards. This modification to the policy was consulted on during the Cambridge and South Cambridgeshire Proposed Modifications consultation, which ran

from 2 December 2015 to 25 January 2016. The proposed modification PM/CC/6/D can be found in the Cambridge Local Plan – Schedule of Modifications (March 2016)⁷⁶.

122. The Council recognises that the provision of sufficient space within new homes is an important element of good residential design and new dwellings should provide sufficient space for basic daily activities and needs. As the nationally described space standards are based on the amount of space needed for key items of furniture and circulation space within dwellings, the requirements are not significantly different from those originally proposed in the Cambridge Local Plan 2014: Proposed Submission. These internal space standards would apply to all homes, including Starter Homes. It is not possible for Councils to require a standard higher than the nationally described space standards for internal space or for it to be applied to student accommodation or HMO.
123. The Council undertook research to measure units within a number of approved developments within Cambridge, in order to ascertain whether the proposed standards (in the policy as originally drafted) were being met by development being delivered in Cambridge. The research assessed a sample of planning applications for a range of dwellings approved since 2008 and their compliance against the London Housing Design Guide⁷⁷ space standards. In particular, applications were assessed against the guide's internal square meterage, and the private external open space requirements including the net floor area of any amenity space (sqm) and amenity space type (balcony, terrace, garden etc). The applications were also assessed against the Housing and Communities Agency's Housing Quality Indicators' internal space standards ranges⁷⁸.
124. Planning applications submitted to the Council between 2009 – 2013 were selected for assessment on the basis of the number of bedrooms in order to allow assessment of a range of different unit types and bedrooms against the standards and on the basis of availability of full plans. A lack of applications for certain bedroom ranges meant that some comparisons were unable to be made, including a six-person four-bed flat, a five-person four-bed two-storey house and a five-person four-bed three-storey house. 66 different house-types/applications were assessed as part of the research.
125. Following the introduction of the nationally described space standards, the Council revisited these applications to assess their compliance with the newly introduced standards. This involved assessing additional information on built-in storage and ceiling heights and single and double/twin bedroom floorspace requirements (area and width) to comply with the nationally described space standards. Due to the increase in assessment criteria, some information such as ceiling height was not readily available retrospectively. In addition, some applications previously assessed had been amended due to the submission of revised plans/ non material amendments. It is also of note that assessing a wider range of larger houses such as eight-person six-bed dwellings was difficult to achieve due to the lack of planning applications for dwellings

⁷⁶ RD/MC/140, pp.35 and 53-57.

⁷⁷ RD/H/170

⁷⁸ Table 5.1, page 27, RD/H/130

of that size. 68 different house-types/applications were assessed as part of the research.

126. Whilst some of the assessed schemes coming forward in the city were considered to meet or exceed the proposed standards, many failed to meet the standard. As a result of this research, the Council resolved to bring forward a policy on residential space standards to address those developments within Cambridge that are still providing sub-standard accommodation. Findings from the research can be found in Appendix 3 to this statement.
127. The Council originally commissioned viability work on the delivery of affordable housing, for overall plan viability and for the Community Infrastructure Levy⁷⁹ all of which included minimum internal space standards for a range of dwelling units based on the London Plan standard. The Council commissioned an update to its viability work to assess the potential impact of the Government's nationally described space standards. This update⁸⁰ showed that the nationally described space standards would be unlikely to impact on the viability of development in Cambridge.
128. With reference to the timing of introduction of the nationally described space standards, the development industry is aware of the Council's intention to introduce minimum internal space standards. Whilst the Council originally intended to introduce standards as set in the Cambridge Local Plan 2014: Proposed Submission, the nationally described space standards are not significantly different. All stages of plan-making for the emerging Local Plan have included questions, issues and options, or policies pertaining to internal space standards.
129. Furthermore, the Council's planning officers are providing 'soft advice' at pre-application stage recommending the use of the national residential space standards. Planning officers have confirmed that the recommendation to apply these standards is not preventing or deterring applicants from moving forward and submitting planning applications based on this advice.
130. The Council considers that the use of the nationally described space standards in Cambridge are compliant with the PPG⁸¹, which notes that local authorities should establish need, viability and timing before the implementation of internal space standards.
- ii. Should paragraph 6.30 give greater clarity as to how the calculation of the external space requirements relating to the number of bedspaces could be demonstrated as being proportionate for a particular proposal?**

131. The Council considers that applicants should demonstrate the provision of suitable external space, as identified in paragraph 6.30, through the submission of plans which

⁷⁹ SHLAA and Potential Site Allocations High Level Viability Assessment (RD/Strat/150); Small Sites – Affordable Housing Viability (RD/H/320); Community Infrastructure Levy Viability Assessment (RD/T/200).

⁸⁰ Local Plans Viability Update (RD/MC/090).

⁸¹ Paragraph Reference: 56-020-20150327, RD/NP/020.

show layouts with garden furniture, refuse bins and circulation space. As identified in paragraphs 6.30 and 6.31, which also provide guidance regarding the number of bedrooms and external space specifications, external space should provide suitable space equivalent to the estimated number of people using the dwelling. Pre-application discussions can also be used to discuss the practicalities of external space provision. The paragraph as drafted allows for flexibility in the particular case regarding the size and layout of external spaces and their relationship with the surrounding area. It should also be noted that criteria (j) to (m) of the modified policy (as proposed in PM/CC/6/D) also provide assessment criteria to inform the design of external spaces and their opportunities and constraints e.g. overlooking neighbouring dwellings, orientation, location and context of development. For clarity, the Council considers that the wording of paragraph 6.30 could be amended to replace the word 'calculating' with 'considering'. This additional modification is included in Appendix 2 to this statement.

6C.2 Policy 51: Lifetime Homes and Lifetime Neighbourhoods

i. Is the policy consistent with the Written Ministerial Statement dated March 2015? If so, would the Council's proposed modifications to the policy text (RD/CFM/010) overcome the above concerns?

132. The Council considers that the proposed modifications to the policy text of Policy 51: Lifetime Homes and Lifetime Neighbourhoods provided in RD/CFM/010 are consistent with the Government's WMS (March 2015), which introduced both mandatory and optional Building Regulations in relation to accessible homes. The Building Regulations came into force on 1 October 2015.
133. In order to ensure that Policy 51: Lifetime Homes and Lifetime Neighbourhoods met the requirements set out in the WMS and the PPG⁸², the Council conducted a study into accessible housing requirements⁸³, hereafter referred to as the accessible housing study.
134. In order to meet the requirements of the WMS and the PPG, the Council considered the need for housing for people with specific needs in Cambridge, accessibility and adaptability of existing housing stock, how needs vary across different housing tenures, and the potential impact on viability of these Building Regulations requirements.
135. The accessible housing study estimates the 'conservative' unmet need in Cambridge to be for a potential 6,539 accessible and adaptable households. This would mean that 67% (when discounting the number of houses already built between 2011/12 and 2015/16) of all new housing would have to be built to M4 (2) standard to meet current unmet housing need. This figure does not include future accessible housing need⁸⁴.

⁸² Paragraph References 56-005-20150327 - 56-012-20150327, RD/NP/020.

⁸³ Accessible Housing in Cambridge: A study into accessible housing requirements in Cambridge for the emerging Local Plan (RD/CFM/040)

⁸⁴ RD/CFM/040, paragraphs 2.21 and 2.25

136. The need for accessible and adaptable homes is evident across all tenures. Table 6 of the accessible housing study predicts that approximately 13,646 owner occupier households, 5,267 housing association or local authority households and 4,784 privately rented households would require minor or moderate work to meet full visitability requirements⁸⁵. These existing households could be considered feasible to convert to accessible dwellings if considering the costs identified in Table 2 of the study⁸⁶. However, by providing 100% accessible and adaptable new dwellings through Part M4 (2) of the Building Regulations, the future need and cost associated with accessibility adaptations to those homes could be reduced for residents and a better range of alternative new-build accommodation would be available for those in properties where adaptations would be problematic or unfeasible. Choice for residents would therefore be increased. Table 6 of the accessible housing study also demonstrates a lack of accessible homes across all tenures and identifies the greatest need for accessible and adaptable homes (due to the lack of fully visitable homes) is not in the affordable housing sector⁸⁷, but in the private sector⁸⁸.
137. Future demand for accessible and adaptable homes is also demonstrated through the needs of an ageing population and the prevalence of long term health issues within Cambridge's population. The accessible housing study estimates that in 2031, a potential 4,985 people aged 65 years and over will be unable to manage one mobility activity on their own) and a potential 8,755⁸⁹ people aged 65 years and over in Cambridge will be unable to manage at least one self-care activity on their own⁹⁰. These residents would therefore be in need of specialist care or in house adaptations such as step-free access to a toilet and sanitary facilities to improve their mobility and quality of life within their home. These findings illustrate a demonstrable need for adaptable homes to meet the requirements of an ageing population in Cambridge. Unfortunately, no significant data is currently available that correlates the household needs of those over 65 years with mobility issues and therefore accessible housing need. As such, a population based indication of the number of people of over 65 years who may require accessible and adaptable housing has been provided.
138. Approximately 6,755 people aged 65 years and over will also be likely to have a trip or fall⁹¹. Hospital admissions and further care as a result of trips and falls in the home put a further strain on the NHS. The Care Act 2014 (Article 19) promotes preventative action in housing, including home adaptations, which is a core principle of the promotion of wellbeing.
139. The accessible housing study demonstrates that there is a need for accessible and adaptable homes to meet the needs of those aged 18 to 64 who have a moderate or serious disability, now and in the future. A total of 9,032 Cambridge residents are estimated to be likely to be affected by a moderate or serious disability by 2031.

⁸⁵ Equivalent to requirement M4 (2).

⁸⁶ RD/CFM/040, page 8.

⁸⁷ Local authority or housing association properties.

⁸⁸ RD/CFM/040, page 14, paragraphs 3.11 – 3.12.

⁸⁹ It should be noted that some people will fall into both categories for mobility and self-care activities.

⁹⁰ RD/CFM/040, pages 18 and 19, paragraphs 4.13 and 4.17.

⁹¹ RD/CFM/040, pages 19 and 20, paragraphs 4.19 – 4.22 and Table 10

Although some of these residents may already have in house adaptations, or specialist care, many will not and the need for further adaptations may increase over time as part of the ageing process⁹².

140. Section 6 of the accessible housing study uses calculations guided by Habinteg's *Towards Accessible Housing – A Toolkit*⁹³ to estimate existing and unmet need. It was established that 10.74% of affordable housing would need to be wheelchair accessible to meet unmet and future wheelchair housing need. However, not every resident with wheelchair housing need will need, want to or be able to be housed in Council or housing association accommodation. It is therefore considered disproportionate to require this percentage of affordable housing to meet requirement M4 (3). The Council has instead put forward a conservative approach of requiring 5% wheelchair user dwellings on developments with 20 affordable housing units or more allows for provision of one full unit. Furthermore, in the interest of promoting wheelchair accessible housing across tenures, the Council is proposing a modification to the supporting text of the policy to encourage developers of market housing to deliver wheelchair accessible housing.
141. The impact of the implementation of optional Building Regulations M4 (2): *Accessible and adaptable dwellings* and M4 (3): *Wheelchair user dwellings* on viability was not addressed in detail as part of the Council's study on accessible housing. However, it should be noted that research by Habinteg contained in their Accessible Housing Standards 2015 suggests that Building Regulation M4 (2) is less onerous to implement than the Lifetime Homes standard originally used in Policy 51 of the emerging Cambridge Local Plan. This implies that the implementation of Building Regulations M4 (2): Accessible and adaptable dwellings would be less costly to implement than its predecessor (Lifetime Homes). The potential impacts of the use of these standards on viability were taken into account in a suite of viability documents produced on behalf of the Council⁹⁴ prior to submission of the Local Plan. Furthermore, the Cambridge and South Cambridgeshire Local Plans Viability Update (November 2015)⁹⁵ also reassessed the viability of policies affected by the WMS including updated costs and found that this did not affect the viability of development within the area⁹⁶. The Local Plans Viability Update also uses updated cost analysis from the Government's EC Harris cost analysis reports⁹⁷ which were used to inform the Government's Housing Standards Review Consultation. Overall, the Local Plans Viability Update shows that the implementation of Building Regulation M4 (2) and M4 (3) is unlikely to impact on the viability of a development.

⁹² RD/CFM/040, page 25, paragraph 5.15.

⁹³ <https://www.habinteg.org.uk/toolkit-introduction>

⁹⁴ SHLAA and Potential Site Allocations High Level Viability Assessment (RD/Strat/150); Small Sites – Affordable Housing Viability (RD/H/320); Community Infrastructure Levy Viability Assessment (RD/T/200).

⁹⁵ RD/MC/090

⁹⁶ RD/MC/090, pages 21-22

⁹⁷ EC Harris – DCLG Housing Standards Review - Potential Cost Impacts Summary (June 2013) and EC Harris – DCLG Housing Standards Review - Potential Cost Impacts (September 2014) at <https://www.gov.uk/government/publications/housing-standards-review-technical-consultation-impact-assessment>

142. The accessible housing study found that there is an existing and unmet housing need for accessible and adaptable dwellings and wheelchair accessible housing in Cambridge. The accessible housing study recommended that 100% of all new homes should be built to regulation M4 (2): Accessible and adaptable dwellings and that the M4 (3): Wheelchair user dwellings requirement should be applied to 5% of all affordable housing developments of 20 units or more. The policy and its supporting text have been modified to reflect these changes and to bring the policy in line with the WMS and the PPG requirements. These modifications are set out in the Further Proposed Modifications⁹⁸.

6C.3 Policy 52: Protecting garden land and the subdivision of existing dwelling plots

i. Should criteria (a) also make reference to the density of the proposed development in relation to that of the surrounding area?

143. The Council does not consider that the addition of density to criterion a) would add anything to the policy. The references in this criterion already allow for the consideration of the development in relation to the surrounding area. The required density on a given site will need to have regard to its wider context and other policies of this plan. The addition of density to this criterion could lead to a simple focus on density as a number, rather than the function of its density in design terms.

6C.4 Policy 53: Flat Conversions

i. Where a new dwelling unit is created should criteria (a) be amended so as to relate to the minimum gross internal floor areas set out in the THS?

144. No, following the publication of the THS, the Council consulted on proposed modifications to Policy 50: Residential Space Standards. The modifications were submitted to the Inspectors in March 2016⁹⁹. This criterion references Policy 50, and the Council therefore considers that there do not need to be any further modifications made to this policy.

ii. Should paragraph 6.41 also include a bullet point relating to the potential worsening of disabled person access arrangements?

145. The list of impacts in paragraph 6.41 is not exhaustive. If and in so far as an existing dwelling has disabled access, the development management process would seek to retain those facilities. However, the Council does not have the means to deliver disabled access arrangements for flat conversions as the Government's accessible homes standards (M4 (2) and M4 (3)) cannot be imposed on flat conversions via Building Regulations. Flat conversions are addressed through Part M: Volume 2 – Buildings Other Than Dwellings, unlike new build dwellings which are addressed by Part M: Volume 1 – Dwellings. As such, the Council considers it would be inappropriate to include a bullet point on disabled access arrangements and, as stated,

⁹⁸ RD/CFM/010.

⁹⁹ RD/MC/140.

the development management process would control the loss of or worsening of any existing disabled access provision where a conversion to flats is proposed.

iii. Would the car parking survey referred to in paragraph 6.43 represent an unacceptably onerous requirement for small scale conversions?

146. The car parking survey referred to in paragraph 6.43 is linked to criterion (c) of Policy 53: Flat Conversions, which requires developments not to have a negative impact on highway safety in streets already experiencing parking stress. The Council is already proposing to be flexible in the application of this requirement. Paragraph 6.43 sets out that this requirement will be relaxed in controlled parking zones where the scheme is car-capped through the permit-system or where a planning obligation prevents residents applying for parking permits, or the development is defined as a car-free development. This is not an overly onerous requirement for small scale conversions, which can impact on areas which are experiencing high levels of car parking.
147. The Council proposes two additional modifications to amend paragraph 6.43 and to introduce additional paragraphs after paragraph 6.43 to clarify the requirements for a parking survey. These additional modifications can be found in Appendix 2 of this statement.

Appendix 1: List of Reference Documents

National Policy

- National Planning Policy Framework (NPPF) (RD/NP/010)
- National Planning Practice Guidance (NPPG)(RD/NP/020)

Government Regulations and Acts

- Written Ministerial Statement, March 2015 (RD/Gov/200)

Cambridge City Council submission documents

- Cambridge Local Plan 2014: Proposed Submission (RD/Sub/C/010)
- Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080)

Adopted development plan documents

- Cambridge Local Plan 2006 (RD/AD/300)
- Cambridge City Council Annual Monitoring Report 2016 (RD/AD/490)

Development Strategy

- Cambridge Sub Region Strategic Housing Market Assessment (SHMA) (May 2013) (RD/Strat/090)
- Cambridge City Council Local Plan - SHLAA and Potential Site Allocations High Level Viability Assessment (May 2013) (RD/Strat/150)
- Population, Housing and Employment Forecasts Technical Report (April 2013) (RD/Strat/080)

Housing

- Homes and Communities Agency's Housing Quality Indicators - Homes and Communities Agency (RD/H/130)
- London Housing Design Guide (RD/H/170)
- Small Sites Affordable Housing Viability (June 2013) (RD/H/320)
- Draft Affordable Housing Supplementary Planning Document (RD/H/330)
- Appeal decision for 315-349 Mill Road Cambridge (RD/H/740)
- Court of Appeal decision: West Berkshire District Council & Reading Borough Council v Department for Communities and Local Government (RD/H/790)

Economy and Tourism

- Cambridge Cluster at 50: The Cambridge economy; retrospect and prospect (RD/E/060)

Community Services and Facilities

- High Court Judgement - West Berkshire District Council and Reading Borough Council v Department for Communities and Local Government (RD/CSF/240)

Transport

- Local Plan Review Community Infrastructure Levy (CIL) viability assessment (February 2013) (RD/T/200)

Modifications Consultation

- Cambridge and South Cambridgeshire Local Plan Examination – Objectively Assessed Housing Need: Further Evidence (November 2015) (RD/MC/040)
- Cambridge City Council & South Cambridgeshire District Council Local Plans Viability Update (October 2015) (RD/MC/090).
- Cambridge Local Plan – Schedule of Modifications (March 2016) (RD/MC/140)

Cambridge Further Modifications

- Further Modifications to the emerging Cambridge Local Plan – Student Accommodation, Gypsies and Travellers, and Accessible Homes (January 2010) (RD/CFM/010)
- Assessment of Student Housing Demand and Supply for Cambridge City Council: (January 2017) (RD/CFM/030)
- Accessible Housing in Cambridge: A Study into accessible housing requirements in Cambridge for the emerging Local Plan (January 2010) (RD/CFM/040)

Other Documents

Note: These documents are not referred to in the Council's reference document library, but have been provided with links below.

- Cambridge City Council: Key Statistics – Strategic Housing (December 2016) <https://www.cambridge.gov.uk/housing-research>
- Centre for Cities Outlook 2017: <http://www.centreforcities.org/publication/cities-outlook-2017/>
- Considering Affordable Housing Financial Contributions – Small sites calculations – weblink only: <https://www.cambridge.gov.uk/affordable-housing-spd>
- EC Harris – DCLG Housing Standards Review - Potential Cost Impacts Summary (June 2013) and EC Harris – DCLG Housing Standards Review - Potential Cost Impacts (September 2014) at <https://www.gov.uk/government/publications/housing-standards-review-technical-consultation-impact-assessment>
- Habinteg: Towards Accessible Housing – A toolkit: <https://www.habinteg.org.uk/toolkit-introduction>
- Homes and Communities Agency's Development Appraisal Tool: <https://www.gov.uk/government/collections/development-appraisal-tool>
- IWA Policy on Mooring on Navigable Waterways, Inland Waterways Association, 2015: https://www.waterways.org.uk/information/policy_documents/mooring_policy
- Local Plans Expert Group Report, 2016: <https://www.gov.uk/government/publications/local-plans-expert-group-report-to-the-secretary-of-state>
- Lloyds Bank press release: www.lloydsbankinggroup.com/globalassets/documents/media/press-releases/lloyds-bank/2016/affordable-cities-2016-final.pdf

Appendix 2: Proposed Modifications

Page	Policy/ Paragraph	Modification	Main/ Additional	Why is the modification being proposed	Has the modification been subject to consultation
152 - 153	Policy 47: Specialist housing	<p>Planning permission will be granted for the development of specialist housing, subject to the development being:</p> <ul style="list-style-type: none"> a. supported by evidence of the demonstrable need for this form of development within Cambridge; b. suitable for the intended occupiers in relation to the quality and type of facilities, and the provision of support and/or care; c. accessible to local shops and services, public transport and other sustainable modes of transport, and community facilities appropriate to the needs of the intended occupiers; and d. in a location that avoids excessive concentration of such housing within any one street or small area. <p>Where the development falls within use class C3 (dwelling houses), the</p>	Additional	<p>This additional modification is proposed to clarify Policy 47: Specialist housing and to ensure the protection of specialist housing. The Council has a current planning application for The Hollies residential care home at 11 Queen Edith's Way (Planning application reference 16/1913/FUL) where the applicant has argued that Policy 47 does not require retention of existing specialist housing. It has always been the Council's intention to retain specialist housing, where it is needed. However, it is acknowledged that the final paragraph is not sufficiently clear to be effective.</p> <p>In terms of need, there is ongoing work on the need for specialist housing at a County-wide level. Cambridge accords</p>	No

Page	Policy/ Paragraph	Modification	Main/ Additional	Why is the modification being proposed	Has the modification been subject to consultation
		development will be expected to contribute to the supply of affordable housing within Cambridge in accordance with Policy 45. If development, <u>including change of use</u> , would involve a net loss of <u>specialist residential floorspace</u> , this will only be permitted where appropriate replacement specialist housing accommodation will be made that satisfies the four criteria a-d <u>or it is demonstrated that there is no local need for the floorspace to be retained for the current use, last use or for any other form of specialist housing and that there is no demand for the floorspace from other operators of specialist housing.</u>		with national trends for an ageing population and the retention of specialist housing is likely to be necessary to address increasing demand over the plan period.	
153	Paragraph 6.16	Forms of housing covered under this policy include: <ul style="list-style-type: none"> • sheltered housing • residential care and nursing homes • extra-care housing • shared homes • cluster units • <u>respite, rehabilitation and convalescent accommodation</u> 	Additional	This additional modification is proposed in response to Representation 28259 to clarify that respite, rehabilitation and convalescent accommodation can be addressed by Policy 47: Specialist Housing.	No

Page	Policy/ Paragraph	Modification	Main/ Additional	Why is the modification being proposed	Has the modification been subject to consultation
		<ul style="list-style-type: none"> • hostel accommodation. 			
154	Paragraph 6.19	<p><i>Insert new paragraph below paragraph 6.19 to read:</i></p> <p><u>Where a proposal includes the loss of specialist residential floorspace, the applicant will be expected to provide appropriate replacement floorspace as required by the policy or will be expected to provide adequate evidence of lack of local need and demand for the floorspace for any form of specialist housing. In providing evidence of lack of local need and demand, the facility will be required to have been offered on the open market and the guidance within Appendix K should be adhered to. Local need in this instance is considered to be city-wide.</u></p>	Additional	This additional modification is proposed for clarity to ensure that there is no loss of specialist housing unless there is appropriate evidence of lack of need and demand.	No
160	Paragraph 6.30	<p>Calculating <u>Considering</u> how much space might be required will be based on bedspaces. External amenity space would not include car parking or turning areas. Suitable arrangements for access to refuse and recycling bins should be made,</p>	Additional	This additional modification is proposed for clarity.	No

Page	Policy/ Paragraph	Modification	Main/ Additional	Why is the modification being proposed	Has the modification been subject to consultation
		in order to prevent bins/bags being transported through dwellings.			
165	Paragraph 6.43	Notional parking capacity on streets is defined from the maximum number of spaces that can be lawfully parked on. This excludes double parking, corner parking, parking on spaces with yellow line controls, in bus-only lanes and cycle lanes (including outside areas of formal enforcement), and in spaces in controlled parking zones blocking driveways and access for emergency vehicles. In order to ascertain whether streets are experiencing parking stress, a survey should be completed for planning applications for flat conversions. The survey should cover a radius of 200m around the property, including side roads. Parking stress is defined as occurring in those streets where surveys show that there is less than 10 per cent free notional parking capacity. This requirement will be relaxed in controlled parking zones where the scheme is car-capped through the permit system, or where a planning obligation prevents residents applying for parking	Additional	This additional modification is proposed to provide clarity on the requirements for a traffic survey when read with the additional modification proposed below to add further paragraphs after paragraph 6.43.	No

Page	Policy/ Paragraph	Modification	Main/ Additional	Why is the modification being proposed	Has the modification been subject to consultation
		permits, or the development is defined as a car-free development.			
165	After Paragraph 6.43	<p><i>Insert the following paragraphs after Paragraph 6.43 to read:</i></p> <p><u>The following guidelines should be followed when undertaking a survey. If these guidelines are not followed, the Council may not be able to make a full and proper assessment of the proposed development.</u></p> <p><u>The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers a 200m walk distance around a site. The survey should be undertaken when the highest number of residents are at home, which is generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (Monday to Thursday).</u></p>	Additional	This additional modification is proposed to provide clarity on the requirements for a traffic survey as set out in paragraph 6.43.	No

Page	Policy/ Paragraph	Modification	Main/ Additional	Why is the modification being proposed	Has the modification been subject to consultation
		<p><u>For sites subject to high levels of daytime parking given the proximity of a major employer, school, or transport node close to any of the following land uses, additional survey times may be necessary. In these cases, surveys between the hours of 1030 -1230.</u></p> <p><u>Surveys should not be undertaken in weeks that include Public Holidays and school holidays and it is advised that weeks preceding and following holidays should also be avoided, as should surveys on or close to a date when a local event is taking place since this may impact the results of the survey.</u></p>			
	Appendix K: Marketing, Local Needs Assessment and Viability Appraisal, before	<i>New heading and paragraph to be inserted after the heading "Specific requirements corresponding to site/land use" and before the heading "Community facilities (not public houses/public house sites)" and paragraph K.9:</i>	Additional	This additional modification is proposed for clarity to ensure that there is no loss of specialist housing unless there is appropriate evidence of lack of need and demand.	No

Page	Policy/ Paragraph	Modification	Main/ Additional	Why is the modification being proposed	Has the modification been subject to consultation
	paragraph K.9	<p><u>Specialist housing</u></p> <p><u>The asking price/rental charge should be pre-agreed in writing with the local planning authority following independent valuation (funded by the developer) by a professional Royal Institution of Chartered Surveyors (RICS) valuer with expertise in the specialist housing sector and who is not engaged to market the property.</u></p> <p><u>Specialist housing can take different forms as indicated in paragraph 6.16, and it is important that the marketing exercise is not restricted to only one form of specialist housing. Consequently, the marketing exercise should be aimed at potential occupiers being from any one of the forms of development detailed in paragraph 6.16.</u></p>			
475	Glossary	<p><i>Insert after Specialist schools:</i></p> <p>Starter Homes Exception Sites</p>	Additional	This additional modification is proposed to provide clarity on Starter Homes Exceptions Sites referred to in Policy 45:	No

Page	Policy/ Paragraph	Modification	Main/ Additional	Why is the modification being proposed	Has the modification been subject to consultation
		<p>The Government's exception site policy enables applications for development for Starter Homes on under-used or unviable industrial and commercial land that has not been currently identified for housing. Suitable sites are likely to be under-used or no longer viable for commercial or industrial purposes, but with remediation and infrastructure costs that are not too great so as to render Starter Homes financially unviable.</p> <p>The types and sizes of site suitable for Starter Homes are likely to vary across the country, and will reflect the pattern of existing and former industrial and commercial use as well as local market conditions. Land in both public and private ownership can be considered.</p>		Affordable housing and dwelling mix	

Appendix 3

Housing Space Standards Dataset - Cambridge Case Studies Compared Against Nationally Described Space Standards

Storeys	Designed Occupancy	Dwelling Type	Development Scheme/ Address	Unit/ Plot No.	Application Ref	A1. Gross Internal Area			A2. Built-in Storage Area			B. Bedroom Requirement	C. Single Bedroom Requirement				D. Double (or twin) Bedroom Floorspace Requirement				E. Double (or twin) Bedroom width requirement		I. Ceiling Height			
						Internal floor area (m ²) of dwelling	NDSS (baseline): Gross Internal Floor Area (m ²)	Comparison against NDSS: Gross Internal Floor Area (m ²)	Comparison of Gross Internal Floor Area as % of NDSS	Internal Storage, Floor Area (m ²)	NDSS (baseline): Internal Storage Floor Area (m ²)		Comparison against NDSS: Internal Storage Floor Area (m ²)	Comparison of Internal Storage Floor Area as % of NDSS	Internal Floor Area (m ²) of Smallest Single Bedroom	NDSS (baseline): Single Bedroom Floor Area (7.5 m ²)	Comparison against NDSS: Single Bedroom Floor Area (m ²)	Comparison of Gross Internal Floor Area as % of NDSS	Is the room at least 2.15m wide?	Internal Floor Area (m ²) of Smallest Double (or Twin) Bedroom	NDSS (baseline): Double (or Twin) Bedroom Floor Area (11.5 m ²)	Comparison against NDSS: Double (or Twin) Bedroom Floor Area (m ²)		Comparison of Gross Internal Floor Area as % of NDSS	Is the principal double (or twin) bedroom at least 2.75m wide?	Are all other double or twin Bedrooms at least 2.55m wide?
1	1 person	1 bed with shower room	5 Wellington Court	Studio 6 (First Floor)	09/0819/FUL	33.0		-4.0	89.2%	0.0		-1.0	0.0%	N/A	N/A	N/A	N/A	11.1		-0.4	96.3%	Yes	N/A	Yes		
			190-192 Histon Road	Flat 6	12/0321/FUL	37.5		0.5	101.4%	0.6		-0.4	64.0%	N/A	N/A	N/A	N/A	10.5		-1.1	90.9%	Yes	N/A	No section provided.		
			Land adjacent to Marino House 7 Severn Place	Studio 1	12/0113/FUL	45.0	37		8.0	121.6%	2.0	1	1.0	200.0%	N/A	N/A	N/A	6.4	11.5		6.4	55.3%	No	N/A	Yes	
			149 Histon Road	Flat F2 (ground floor)	15/1286/FUL	27.0			-10.0	73.0%	0.0		-1.0	0.0%	N/A	N/A	N/A	N/A - Open plan			N/A	N/A	Yes	N/A	Yes	
			30-31 Occupation Road	Flat 4	12/0628/FUL	36.0			-1.0	97.3%	0.7		-0.3	73.0%	N/A	N/A	N/A	10.4		-1.1	90.7%	Yes	N/A	Yes		
1	1 person	1 bed with bathroom	No Data Available					N/A		1		N/A					11.5									
1	2 person	1 bed	5 Wellington Court	Flat 14	09/0819/FUL	48.0		-2.0	96.0%	0.0		-1.5	0.0%	N/A	N/A	N/A	N/A	11.1		-0.4	96.5%	Yes	N/A	No section provided.		
			Talbot House - sheltered housing	Flat 1	08/0406/FUL	58.8		8.8	117.7%	2.2		0.7	149.3%	N/A	N/A	N/A	N/A	12.8		1.3	111.5%	Yes	N/A	No section provided.		
			190-192 Histon Road	Flat 10	12/0321/FUL	40.5		-9.5	81.0%	1.9		-0.4	126.7%	N/A	N/A	N/A	11.7		0.2	102.0%	Yes	N/A	No section provided.			
			30-31 Occupation Road	Flat 11	12/0628/FUL	52.0		2.0	104.0%	2.0		0.5	132.0%	N/A	N/A	N/A	14.2		2.7	123.0%	Yes	N/A	Yes			
			Travis Perkins Depot Devonshire Road	Plot 27	11/1294/FUL	53.8		3.8	107.6%	2.9		1.4	191.3%	N/A	N/A	N/A	11.8		0.3	103.0%	Yes	N/A	No section provided.			
			9-15 Harvest Way	Flat 101 Market	11/0219/FUL	44.6		-5.4	89.2%	0.7		-0.8	49.3%	N/A	N/A	N/A	10.7		-0.8	92.9%	Yes	N/A	Yes			
			9-15 Harvest Way	Flat 102 Affordable	11/0219/FUL	47.6		-2.4	95.2%	8.2		6.7	548.0%	N/A	N/A	N/A	10.4		-1.1	90.3%	Yes	N/A	Yes			
			Flat 103 Shared																							
			9-15 Harvest Way	Residency	11/0219/FUL	48.3		-1.7	96.6%	1.2		-0.3	82.7%	N/A	N/A	N/A	11.3		-0.2	98.6%	Yes	N/A	Yes			
			Langham House	Ground floor 1 bed	15/0557/FUL	46.5		-3.5	93.0%	0.0		-1.5	0.0%	N/A	N/A	N/A	12.3		0.8	107.0%	Yes	N/A	Yes			
			21-23 Milton Road	Flat F1 (Ground Floor)	15/0363/FUL	40.0		-10.0	80.0%	0.0		-1.5	0.0%	N/A	N/A	N/A	9.6		-1.9	83.5%	Yes	N/A	Yes			
			71-75 New Street	Flat F3 (First Floor)	13/0901/FUL	33.0		-17.0	66.0%	0.7		-0.9	43.3%	N/A	N/A	N/A	7.8		-3.7	67.8%	Yes	N/A	Yes			
			9-15 Harvest Way	Flat 104 Market	11/0219/FUL	53.8		3.8	107.6%	1.2		-0.3	82.7%	N/A	N/A	N/A	11.3		-0.2	98.6%	Yes	N/A	Yes			
			1 High Street, Cherry Hinton	Flat 5	08/0084/FUL	55.7		5.7	111.5%	1.1		-0.4	72.7%	N/A	N/A	N/A	11.6		0.1	100.9%	Yes	N/A	No section provided.			
			Glebe Farm (Apartment Block G)	Flat 2	09/1140/FUL	49.0		-1.0	98.0%	2.2		0.7	148.0%	N/A	N/A	N/A	12.4		0.9	107.8%	Yes	N/A	No section provided.			
			Glebe Farm (Apartment Block B)	Flat 6	09/1140/FUL	50.0		0.0	100.0%	1.7		0.2	112.0%	N/A	N/A	N/A	12.0		0.5	104.6%	Yes	N/A	No section provided.			
			Glebe Farm (Apartment Block B)	Flat 8	09/1140/FUL	54.3		4.3	108.6%	2.2		0.7	146.7%	N/A	N/A	N/A	12.9		1.4	112.4%	Yes	N/A	No section provided.			
			Glebe Farm (Apartment Block A)	Flat 3	09/1140/FUL	47.2		-2.8	94.3%	1.7		0.2	116.0%	N/A	N/A	N/A	13.5		2.0	117.4%	Yes	N/A	No section provided.			
			115-119 Perne Road	Flat 2	12/0730/FUL	40.3		-9.7	80.6%	0.1		-1.4	8.7%	N/A	N/A	N/A	8.3		-3.2	72.3%	Yes	N/A	Yes			
			1	3 person	2 bed	190-192 Histon Road	Flat 13 Market	12/0321/FUL	68.0		7.0	111.5%	1.1		-1.0	52.5%	Yes	8.5		1.0	113.9%	Yes	13.5		2.0	117.0%
Glebe Farm (Apartment Block G)	Flat 4	09/1140/FUL				63.0		2.0	103.3%	1.8		-0.2	91.0%	Yes	8.0		0.5	107.1%	Yes	11.5		0.0	100.0%	Yes	N/A	No section provided.
Glebe Farm (Apartment Block B)	Flat 12	09/1140/FUL				60.0		-1.0	98.4%	1.6		-0.4	81.0%	Yes	7.6		0.1	101.5%	Yes	12.0		0.5	104.3%	Yes	N/A	No section provided.
Talbot House - sheltered housing	Flat 19 Market	08/0406/FUL				68.3		7.3	112.0%	0.0		-2.0	0.0%	Yes	8.4		0.9	112.0%	Yes	13.8		2.3	119.7%	Yes	N/A	No section provided.
1 High Street, Cherry Hinton	Flat 4	08/0084/FUL				56.9		-4.1	93.3%	0.0		-2.0	0.0%	Yes	6.5		-1.0	87.1%	Yes	11.2		-0.3	97.3%	Yes	N/A	No section provided.
Langham House	Ground floor 2 bed flat	15/0557/FUL				82.5		21.5	135.2%	0.0		-2.0	0.0%	Yes	12.0		4.5	160.0%	Yes	17.5		6.0	152.2%	Yes	N/A	Yes
33 Queen Edith's Way	Flat 3 (First Floor)	15/0695/FUL				78.0		17.0	127.9%	2.1		0.1	105.0%	Yes	8.4		0.9	112.0%	Yes	13.1		1.6	113.9%	Yes	N/A	Yes
71-75 New Street	Flat F5 (First Floor)	13/0901/FUL				66.0		5.0	108.2%	3.0		-0.8	88.9%	No	11.7		0.2	101.6%	Yes	11.7		0.2	101.6%	Yes	N/A	Yes
71-75 New Street	Flat F1 (First Floor)	13/0901/FUL				57.9		-12.1	82.7%	0.0		-2.0	0.0%	Yes	N/A		N/A	N/A	7.5		-4.0	65.2%	Yes	Yes	Yes	
21-23 Milton Road	Flat F6 (Second Floor)	15/0363/FUL				67.7		-2.3	96.7%	0.0		-2.0	0.0%	Yes	N/A		N/A	N/A	10.5		-1.0	91.3%	Yes	Yes	Yes	
115-119 Perne Road	Flat 1 Market	12/0730/FUL				58.8		-11.2	84.0%	0.6		-1.4	28.0%	Yes	N/A		N/A	N/A	9.5		-2.0	82.3%	Yes	Yes	Yes	
9-15 Harvest Way	Flat 111 Affordable	11/0219/FUL				72.4		2.4	103.4%	1.6		-0.4	82.0%	Yes	N/A		N/A	N/A	8.7		-2.8	75.9%	Yes	Yes	Yes	
9-15 Harvest Way	Flat 002 Market	11/0219/FUL	72.4		2.4	103.4%	1.6		-0.4	82.0%	Yes	N/A		N/A	N/A	8.9		-2.6	77.7%	Yes	Yes	Yes				
1 High Street, Cherry Hinton	Flat 3 Market	08/0084/FUL	66.1		-3.9	94.5%	0.6		-1.4	30.0%	Yes	N/A		N/A	N/A	10.1		-1.4	88.1%	Yes	Yes	No section provided.				
Neath Farm (Apartment Block 2)	Plot 8 Affordable	09/0403/REM	61.0		-9.0	87.1%	1.0		-1.0	50.0%	Yes	N/A		N/A	N/A	9.3		-2.2	80.6%	Yes	Yes	No section provided.				
Travis Perkins Depot Devonshire Road (Coach House A)	Plot 17	11/1294/FUL	78.2		8.2	111.7%	0.8		-1.2	41.5%	Yes	N/A		N/A	N/A	13.5		2.0	117.7%	Yes	Yes	No section provided.				
Travis Perkins Depot Devonshire Road (2 bed flat)	Plot 11	11/1294/FUL	75.2		5.2	107.4%	0.6		-1.4	32.0%	Yes	N/A		N/A	N/A	10.3		-1.2	89.3%	Yes	Yes	No section provided.				
78-80 Fulbourn Road (House Type 06.10.669 2 bed)		09/1000/REM	64.9		-5.1	92.7%	1.0		-1.0	50.0%	Yes	N/A		N/A	N/A	9.4		-2.2	81.3%	Yes	Yes					
1	4 person	3 bed	No Data Available					N/A		2.5		N/A					11.5									
1	5 person	3 bed	33 Queen Edith's Way	Flat 1 (ground floor)	15/0695/FUL	102.0		16.0	118.6%	2.5		0.0	100.0%	Yes	6.2		-1.3	82.7%	Yes	10.8		-0.7	93.9%	Yes	Yes	Yes
1	5 person	3 bed	9-15 Harvest Way	Flat 3 Market	11/0219/FUL	98.4		12.4	114.4%	2.0		-0.5	81.6%	Yes	7.8		0.3	103.7%	Yes	10.9		-0.7	94.3%	Yes	Yes	Yes
1	6 person	3 bed	33 Queen Edith's Way	Flat 7 (Second Floor)	15/0695/FUL	125.0		30.0	131.6%	1.5		-1.0	60.0%	Yes	N/A		N/A	Yes	9.0		-2.5	78.3%	Yes	Yes	Yes	
1	5 person	4 bed	No Data Available					90	N/A			N/A					11.5									
1	6 person	4 bed	No Data Available					99	N/A			N/A					11.5									
1	7 person	4 bed	No Data Available					108	N/A			N/A					11.5									
1	8 person	4 bed	No Data Available					117	N/A			N/A					11.5									
1	6 person	5 bed	No Data Available					103	N/A			N/A					11.5									
1	7 person	5 bed	No Data Available					112	N/A			N/A					11.5									
1	8 person	5 bed	No Data Available					121	N/A			N/A					11.5									
1	7 person	6 bed	No Data Available					116	N/A			N/A					11.5									
1	8 person	6 bed	No Data Available					125	N/A			N/A					11.5									

Housing Space Standards Dataset - Cambridge Case Studies Compared Against Nationally Described Space Standards

Storeys	Designed Occupancy	Dwelling Type	Development Scheme/ Address	Unit/ Plot No.	Application Ref	A1. Gross Internal Area				A2. Built-in Storage Area				B. Bedroom Requirement	C. Single Bedroom Requirement					D. Double (or twin) Bedroom Floorspace Requirement				E. Double (or twin) Bedroom width requirement		I. Ceiling Height						
						Internal floor area (m ²) of dwelling	NDSS (baseline): Gross Internal Floor Area (m ²)	Comparison against NDSS: Gross Internal Floor Area (m ²)	Comparison of Gross Internal Floor Area as % of NDSS	Internal Storage, Floor Area (m ²)	NDSS (baseline): Internal Storage Floor Area (m ²)	Comparison against NDSS: Internal Storage Floor Area (m ²)	Comparison of Internal Storage Floor Area as % of NDSS		Internal Floor Area (m ²) of Smallest Single Bedroom	NDSS (baseline): Single Bedroom Floor Area (7.5 m ²)	Comparison against NDSS: Single Bedroom Floor Area (m ²)	Comparison of Gross Internal Floor Area as % of NDSS	Is the room at least 2.15m wide?	Internal Floor Area (m ²) of Smallest Double (or Twin) Bedroom	NDSS (baseline): Double (or Twin) Bedroom Floor Area (11.5 m ²)	Comparison against NDSS: Double (or Twin) Bedroom Floor Area (m ²)	Comparison of Gross Internal Floor Area as % of NDSS	Is the principal double (or twin) bedroom at least 2.75m wide?	Are all other double or twin Bedrooms at least 2.55m wide?							
2	2 person	1 bed	No Data Available			58		N/A		1.5		N/A			7.5		N/A			11.5		N/A										
2	3 person	2 bed	No Data Available			70		N/A		2		N/A			7.5		N/A			11.5		N/A										
2	4 person	2 bed	Travis Perkins Depot Devonshire Road (House type E)		11/1294/FUL	77.3		-1.7	97.8%	3.0		2		1.0	149.0%	Yes	N/A			8.9		11.5		-2.6	77.0%	Yes	Yes	No section provided.				
			Land adjacent to Marino House 7 Severn Place	Flat 3 Duplex	12/0113/FUL	67.2		-11.8	85.1%	2.5		0.5	125.0%	Yes	N/A		0.5	125.0%	Yes	N/A	8.5		11.5		-3.0	73.9%	Yes	No	Yes			
			Glebe Farm (House type A)	Plot 90	09/1140/FUL	80.7		1.7	102.2%	2.1		0.0	102.5%	Yes	N/A		0.0	102.5%	Yes	N/A	11.9		11.5		0.4	103.3%	Yes	Yes	No section provided.			
			Glebe Farm (House type J)	Plot 74	09/1140/FUL	94.6		15.6	119.7%	4.5		2.5	225.0%	Yes	N/A		2.5	225.0%	Yes	N/A	11.3		11.5		-0.2	98.3%	Yes	Yes	No section provided.			
2	4 person	3 bed	No Data Available			84		N/A		2.5		N/A			7.5		N/A			11.5		N/A										
2	5 person	3 bed	Neath Farm (House type C)	Plot 1	09/0403/REM	83.6		-9.4	89.9%	1.0		2.5		-1.5	40.0%	Yes	5.1		-2.4	68.0%	No	7.8		11.5		-3.7	67.5%	Yes	No	No section provided.		
			78-80 Fulbourn Road (House Type 06.3201 3 bed)		09/1000/REM	77.0		-16.0	82.8%	1.7		-0.8	68.4%	Yes	4.4		-3.1	58.9%	No	7.8		11.5		-3.7	67.9%	Yes	Yes	No section provided.				
			Glebe Farm (House type B)	Plot 75	09/1140/FUL	94.0		1.0	101.1%	1.4		-1.1	54.8%	Yes	6.6		-0.9	87.7%	Yes	13.9		11.5		2.4	120.7%	Yes	Yes	No section provided.				
			Auckland Road	Plot 2	14/0978/FUL	103.3		10.3	111.1%	3.7		1.2	148.0%	Yes	7.5		0.0	100.0%	Yes	10.4		11.5		-1.1	90.4%	Yes	Yes	Yes				
			Travis Perkins Depot Devonshire Road (House type F1)		11/1294/FUL	95.2		2.2	102.4%	0.0		-2.5	0.0%	Yes	8.1		0.6	107.7%	Yes	8.5		11.5		-3.0	73.6%	Yes	Yes	No section provided.				
2	6 person	3 bed	No Data Available			102		N/A		2.5		N/A			7.5		N/A			11.5		N/A										
2	5 person	4 bed	Auckland Road	Plots 1 & 3	14/0978/FUL	119.4		22.4	123.1%	4.5		3		1.5	150.0%	Yes	10.4		2.9	138.7%	Yes	11.4		11.5		-0.1	99.1%	Yes	Yes	Yes		
2	6 person	4 bed	Glebe Farm (House type E - Plot 126)		09/1140/FUL	128.0		22.0	120.8%	1.3		3		-1.7	42.7%	Yes	7.0		-0.5	93.3%	Yes	11.7		11.5		0.2	101.8%	Yes	Yes	No section provided.		
2	7 person	4 bed	231-249 Milton Road	House Type B	12/1537/FUL	137.6		22.6	119.7%	1.2		3		-1.8	40.0%	Yes	10.5		3.0	140.0%	Yes	9.6		11.5		-1.9	83.5%	Yes	Yes	No section provided.		
2	8 person	4 bed	No Data Available			124		N/A		3		N/A			7.5		N/A				11.5		N/A									
2	6 person	5 bed	No Data Available			110		N/A		3.5		N/A			7.5		N/A				11.5		N/A									
2	7 person	5 bed	No Data Available			119		N/A		3.5		N/A			7.5		N/A				11.5		N/A									
2	8 person	5 bed	No Data Available			128		N/A		3.5		N/A			7.5		N/A				11.5		N/A									
2	7 person	6 bed	No Data Available			123		N/A		4		N/A			7.5		N/A				11.5		N/A									
2	8 person	6 bed	No Data Available			132		N/A		4		N/A			7.5		N/A				11.5		N/A									
3	4 person	3 bed	No Data Available			90		N/A		2.5		N/A			7.5		N/A				11.5		N/A									
3	5 person	3 bed	Land to rear of 100-108 Shelford road (3b6p) 13 units		11/0955/FUL	118.2		19.2	119.4%	U/K		2.5		U/K	U/K						11.5		N/A									
3	6 person	3 bed	151-155 Vinery Road	Plot 1	14/1634/FUL	125.6		17.6	116.3%	4.0		2.5		1.5	160.0%	Yes	N/A		N/A	N/A	9.2		11.5		-2.3	80.0%	Yes	Yes	Yes			
			231-249 Milton Road	House Type A	12/1537/FUL	110.4		2.4	102.2%	0.9		-1.6	36.0%	Yes	N/A		N/A	N/A	N/A	9.8		11.5		-1.7	85.2%	Yes	Yes	No section provided.				
			Midsummer Limes	Single Plot	15/0544/FUL	221.5		113.5	205.1%	27.9		25.4	1116.0%	Yes	N/A		N/A	N/A	N/A	12.7		11.5		1.2	110.4%	Yes	Yes	Yes				
3	5 person	4 bed	78-80 Fulbourn Road (House Type 06.3304 3 bed)		09/1000/REM	109.0		1.0	100.9%	0.9		3		-1.6	37.2%	Yes	N/A		N/A	N/A	9.8		11.5		-1.7	85.4%	Yes	Yes	No section provided.			
3	6 person	4 bed	No Data Available			103		N/A		3		N/A			7.5		N/A				11.5		N/A									
3	6 person	4 bed	Glebe Farm (House type D - Plot 108)		09/1140/FUL	127.0		15.0	113.4%	1.9		3		-1.1	64.0%	Yes	7.6		0.1	101.3%	Yes	14.1		11.5		2.6	122.3%	Yes	Yes	No section provided.		
3	7 person	4 bed	No Data Available					N/A				3			N/A							11.5		N/A								
			Glebe Farm (House type F - Plot 138)		09/1140/FUL	146.0		25.0	120.7%	1.3		-1.7	42.7%	Yes	9.2		1.7	122.4%	Yes	14.0		11.5		2.5	121.7%	Yes	Yes	No section provided.				
			21-23 Milton Road	House 1	15/0363/FUL	137.7		16.7	113.8%	5.4		2.4	180.0%	Yes	6.3		-1.2	84.0%	No	8.4		11.5		-3.1	73.0%	Yes	Yes	Yes				
3	8 person	4 bed	39 Shelford Rd (Plot 1 - 4b6p)		10/0561/FUL	195.0		65.0	150.0%	1.1		3		-1.9	37.7%	Yes	N/A		N/A	N/A	12.2		11.5		0.7	105.9%	Yes	Yes	Yes			
			231-249 Milton Road	House Type C (excluding garage)	12/1537/FUL	166.3		36.3	127.9%	6.0		3.0	200.0%	Yes	N/A		N/A	N/A	N/A	11.3		11.5		-0.2	98.3%	Yes	Yes	No section provided.				
			151-155 Vinery Road	Plot 4	14/1634/FUL	144.0		14.0	110.8%	1.5		-1.5	50.0%	Yes	N/A		N/A	N/A	N/A	9.1		11.5		-2.4	79.1%	Yes	Yes	Yes				
			Glebe Farm (House type H - Plot 162)		09/1140/FUL	190.0		60.0	146.2%	4.0		1.0	134.0%	Yes	N/A		N/A	N/A	N/A	10.6		11.5		-0.9	92.2%	Yes	Yes	No section provided.				
3	6 person	5 bed	No Data Available			116		N/A		3.5		N/A			7.5		N/A				11.5		N/A									
3	7 person	5 bed	No Data Available			125		N/A		3.5		N/A			7.5		N/A				11.5		N/A									
3	8 person	5 bed	No Data Available			134		N/A		3.5		N/A			7.5		N/A				11.5		N/A									
3	7 person	6 bed	No Data Available			129		N/A		4		N/A			7.5		N/A				11.5		N/A									
3	8 person	6 bed	No Data Available			138		N/A		4		N/A			7.5		N/A				11.5		N/A									

NDSS: Nationally described space standards
 * Note: These measurements were performed using a scaled drawing and the measurement tool on Adobe. Measurements may not be entirely precise.