

**Affordable Housing**  
**Supplementary Planning Document**

**Statement of Consultation**

A number of affordable housing providers, developers and agents were consulted during the preparation of this draft Affordable Housing Supplementary Planning Document. The table below provides a list of those consultees.

Bedfordshire Pilgrims Housing Association
Cambridge Housing Society
Hundred Houses Society
Granta Housing Society
Circle Anglia
Marshall's Aerospace Ltd
Countryside Properties plc (c/o Bidwells)
The Bell Education Trust (c/o Smith Stuart Reynolds)
Trumpington Meadows Land Company (c/o Terrence O'Rourke)
Ashwell Developments
David Wilson Homes (c/o Bidwells)
University of Cambridge Estates Management and Building Service
Savills
Januaries
Bidwells
Carter Jonas
Barton Willmore
King Street Housing Society
Flagship (The Cambridge Housing Society)
Nene Housing Society
Places for People
Hereward Housing

Responses were invited by letter dated 22 January 2007 on the following issues:

- The key issues involved;
- What you would like to see covered in the SPD and to what level of detail;
- What can the SPD do to speed up the delivery of housing in Cambridge or conversely, to not unduly delay its delivery;
- What approach would you favour to calculate the contributions from employment development under policy 5/6;
- What would be the most practical way to resolve differences regarding viability; and
- Any other matters of concern.

There were a number of key issues raised by the consultees during this time. A summary of these and how they were dealt with is given in the table below:

<b>Name</b>	<b>Issue Raised</b>	<b>How it was dealt with</b>
Turnstone Estates Limited	1. Account must be taken of tariffs being set in neighbouring Local Planning	1. Account has been taken of the approach in South Cambridgeshire District.

	<p>Authorities.</p> <ol style="list-style-type: none"> <li>2. The guidance must be clear and easy to calculate so that developers can appraise its financial consequences.</li> <li>3. Regard must be had to existing uses on a site and contributions sought only in relation to net increases so as not to disadvantage comprehensive redevelopments.</li> <li>4. Regard must always be had to financial viability.</li> <li>5. Concern expressed that they were not directly consulted.</li> </ol>	<ol style="list-style-type: none"> <li>2. The guidance has been drafted to be clear and easy to calculate.</li> <li>3. The draft SPD does take this factor into account. .</li> <li>4. The draft SPD does take financial viability into account.</li> <li>5. The initial consultation was not intended to be exhaustive.</li> </ol>
Marshall of Cambridge (Holdings) Ltd	<ol style="list-style-type: none"> <li>1. There will be a need to include cascade mechanisms in the SPD.</li> <li>2. There is likely to be a shortage of funding for affordable housing. Advocates use of financial contributions from smaller sites to assist provision on the larger urban extension sites.</li> <li>3. Letting policies must take account of the need to create balanced and sustainable new communities.</li> <li>4. Regarding policy 5/6, expresses doubts about how this policy could be implemented fairly.</li> </ol> <p>Mechanisms must be used to protect the value of any key worker affordable housing over the long term.</p>	<ol style="list-style-type: none"> <li>1) Cascade mechanisms are provided for in the SPD.</li> <li>2) Financial contributions in lieu of on-site provision will only be accepted in exceptional circumstances due to the need to maximise the delivery of affordable housing.</li> <li>3) The draft SPD does take this factor into account.</li> <li>4) The draft SPD proposes a reasonable method to implement this policy fairly. .</li> <li>5) This is a requirement of national policy and of the SPD.</li> </ol>
Tetlow King Planning	<ol style="list-style-type: none"> <li>1. Expresses concerns about the time allowed for comment and the open-ended nature of the questions.</li> <li>2. Advocates joint working with South Cambridgeshire District Council on the SPD as many sites are cross border, such as at Trumpington Meadows.</li> <li>3. Considers that the SPD can be afforded little weight until it is adopted.</li> </ol>	<ol style="list-style-type: none"> <li>1. The City Council considers the time allowed to have been adequate at this early stage in preparation of the SPD and given the nature of the consultation. This was not open-ended as guidance was given on the key issues identified by the Council for comment.</li> <li>2. South Cambridgeshire District Council officers have been kept informed of the development of the SPD. Both Council's have very similar approaches concerning affordable housing provision.</li> </ol>

### Public Participation (Regulation 17)

The draft SPD and its accompanying sustainability appraisal were then made available for public consultation for 6 weeks from 3<sup>rd</sup> September to 15<sup>th</sup> October. The following bodies were directly consulted:

**Statutory Consultees**

Parish Council's (x11)  
GO-East  
Highways Agency  
County Council  
South Cambridgeshire District Council  
East of England Regional Assembly  
East of England Development Agency  
Natural England  
The Countryside Agency  
English Heritage  
Network Rail  
Environment Agency  
BT Openreach Newsite  
Cable & Wireless UK  
Cambridge Water Company  
Anglian Water Services  
Mobile Operators Association  
National Grid Transco  
EDF Energy  
Npower Renewables  
NTL  
The Norfolk, Suffolk & Cambridgeshire Strategic Health Authority  
Cambridgeshire Horizons

**General Consultees**

City Councillors (x42)  
Ward County Councillors (x14)  
MP's (x3)

All those organisations appearing on the consultation database were consulted in May 2007 whether they wanted to be consulted on the Affordable Housing SPD, the results of which consultation are reflected in the following list of Consultees.

Age Concern Cambridgeshire  
Anchor Trust  
Anglia Ruskin University  
Ashwell Developments  
Barker Parry Town Planning  
Barton Willmore  
Bateman Street & Bateman Mews Residents' Association  
Bedfordshire Pilgrims Housing Association  
Bellway Homes  
Bidwells  
Brooklands Avenue & Area Residents' Association  
Cambridge Chamber of Commerce  
Cambridge Cyrenians  
Cambridge Federation of Tenants, Leaseholders & Residents  
Cambridge Green Party  
COPE  
Cambridge Preservation Society

Cambridge Regional College  
Cambridge United FC  
Cambridge University Hospitals NHS Foundation Trust  
Cambridge Urban Design Forum  
Cambridgeshire & District Law Society  
Cambridgeshire Constabulary  
Cambridgeshire Football Association  
Cambridgeshire Local Access Forum  
Cambridgeshire Primary Care Trust  
CAMCAT Housing Association  
Carter Jonas  
Castle Community Action Group  
Christ Pieces Residents' Association  
Church of England, Diocese of Ely  
Churchill College  
Circle Anglia  
Clare Hall  
Colliers CRE  
Conservators of the River Cam  
Countryside Properties  
CPRE Cambridge & South Cambridgeshire Group  
CPRE Cambridgeshire  
David Wilson Homes  
Devplan UK  
Downing College  
Drivers Jonas  
Dudley Developments  
East of England Faiths Council  
University Estate Management & Building Service  
Eversheds LLP  
Fairview New Homes  
Fen Ditton Village Society  
Fitzwilliam College  
Gallagher Estates  
Girton College  
Glisson Road & Tenison Road Residents' Association  
Gough Planning Services  
Greenlands Residents' Association  
Grosvenor (Trumpington Meadows Land Company)  
Hallam Land Management  
Hanover & Princes Court Residents' Association  
Hartington Grove Residents' Association  
Housing Corporation  
Hundred Houses Society  
Hundred Houses Tenants Association  
Januarys  
Kings Hedges Neighbourhood Partnership  
Laxton Way Residents' Association  
LDA Design  
Lichfield & Neville Road Residents' Action Group  
Magdalene College  
Marshalls

MENTER  
Metropolis pd  
Mill Road Community Improvements Group  
Mitchams Corner Residents' & Traders Association  
NAFRA  
Norfolk Terrace & Blossom Street Residents' Association  
Norwich Street Residents' Association  
Old Chesterton Residents' Association  
ORS Plc  
Perse School  
PACT  
Phillips Planning Services Ltd  
Planning Potential  
Queen's College  
Royal Institute of British Architects  
RTPI  
RSPB Eastern England Office  
Rustat Neighbourhood Association  
Savills  
Savills (L+P) Ltd  
Smith Stuart Reynolds  
Tavistock Road & Stratfield Close Residents' Association  
Terence O'Rourke  
The Bursars Committee  
The Home Builders Federation  
Three Trees Residents' Association  
Trinity College  
Trumpington Elderly Action Group  
TEAG  
Trumpington Residents' Association  
Turnstone Estates  
UK Green Building Council  
White Young Green Planning  
West Cambridge Preservation Society  
Windsor Road Residents  
Wolfson College  
WSP Development & Transportation Ltd  
York Street Residents' Action Group

In addition the consultation was advertised in the Local Press and copies of the consultation documents were made available at the City Council's Environment and Planning Reception. Consultation documents were also sent to public libraries across the city.

201 representations were made to the SPD, 28 in support and 73 in objection. Appendix A summarises the representations and provides an officer assessment and recommendations for amendments. The table below details the exact changes that were made to the SPD.

## Table of Changes

SPD Section	Rep Nos & Appendix A Page No	Change
Paragraph 8	3259, 3101 Page 6  3116	8. The Secretary of State is expected to publish the final <u>Regional Spatial Strategy (RSS)</u> in <del>mid-2007-early 2008</del> . Once approved, the RSS will provide a regional planning framework for Local Development Documents, which must be in general conformity with it. The approved RSS will replace existing Regional Planning Guidance for East Anglia to 2016 (RPG6) and Affordable Housing - Draft SPD the Cambridgeshire & Peterborough Structure Plan 2003. <del>However, Whilst some policies of the current Structure Plan will be have been saved as part of the finalised RSS process none of the saved policies relate to affordable housing. The precise policies to be saved will not be known until the publication of the final RSS</del>
Paragraph 28	3228 Page 18	28. Any off-site provision must be made within Cambridge or in an urban extension to Cambridge within South Cambridgeshire <u>or at Northstowe</u> on a suitable site or sites and should provide the amount of affordable housing that could have been expected from the development of all of the affected sites including that of the original site.
Paragraph 55	3281 Page 22	55. Student housing will not be counted as a form of affordable housing provision. <u>Such accommodation will not count as affordable housing and cannot contribute to meeting the affordable housing requirement on a development site.</u> It is not permanent housing, being provided only because an individual has chosen to study at a specific educational institution in Cambridge. <u>No affordable housing requirement will be generated by the development of accommodation for students (where secured by appropriate legal obligations).</u>
Paragraph 48	3160 Page 31	48. There will be a presumption that development will include full and appropriate provision for affordable housing unless it is demonstrated that it cannot be provided at a rate of 40% or more of the dwellings in a development. The onus is therefore on a developer to demonstrate that viability would be jeopardised. This will require a full economic appraisal of the costs of development and of returns from the sale of housing to show what sum could be made available for affordable housing. The methodology, underlying assumptions and software used to undertake this appraisal should be agreed with a default for <u>schemes attracting Housing Corporation funding</u> being the current methodology endorsed by the Housing Corporation. The appraisal should be presented on a residual land value basis taking into account all the costs of development including contributions to local infrastructure and services, the provision of affordable housing and the profit margin required by the developer. It should also include a valuation of the site in its existing use, not its purchase price or hope value. The appraisal should accompany the planning application or preferably form part of pre-application negotiations.
Paragraph 57	3163 Page 33	Footnote – 5: The following sites are included in the programme: Northstowe, Southern Fringe, North West Cambridge <u>between Huntingdon Road and Histon Road.</u>

## **Meeting Housing Needs from Employment Development**

Paragraph 9 of the draft SPD raised the issue of whether it was reasonable to seek to implement policy 5/6 of the Cambridge Local Plan (affordable housing contributions from employment development) given that the Regional Spatial Strategy was not proposing to include any such policy reference. A number of representations have been submitted putting forward arguments why this policy approach should not be carried forward for implementation.

Normally these would not have been sufficient in themselves to justify such a change in the implementation of policy. However an equivalent policy was included in the Cambridge East Area Action Plan, which was subject to an Examination in Public in July 2007. The Inspectors Report was received on 27<sup>th</sup> November. An extract from it is included as Appendix E together with the unamended wording of policy CE/10 from the Cambridge East AAP. This concludes that in the absence of support from a recent higher-level policy there is a need for convincing evidence that specific local circumstances justify the imposition of the requirement, but the available evidence base is insufficient to do this. In order to make the policy 'sound' the parts of it dealing with affordable housing from employment development is subject to a binding recommendation that they be deleted.

Given this policy context, officers consider that it would prove difficult to implement this policy effectively and that there would be a real risk of decisions based upon it being overturned on appeal. To avoid future uncertainty affecting the operation of the development control process officers recommend that a clear decision be taken now not to seek to implement the policy.

## **The Sustainability Appraisal**

The overall findings of Stage B of the SA process were that the existence of the Affordable Housing SPD would have positive benefits on the SA objectives. The appraisal of the SPD also considered the option of not producing an SPD to guide the implementation of affordable housing policy. The appraisal of this option found that it would have a negative impact on many of the SA objectives. Although the Local Plan policies would remain in force without an SPD, the lack of guidance would lead to an increase in negotiation time on planning applications, delaying the provision of much needed housing in Cambridge. This would have the additional impact of putting an additional strain on the City's housing market, which could have the effect of pushing up house prices. Thus it was concluded that the only way forward was to pursue the provision of an SPD.

The SA process did identify a number of uncertainties and risks surrounding the SPD, chiefly surrounding the delay in completion of the Cambridge Sub-Regional Housing Market Assessment. It was hoped that the outputs of this study would be available to inform the preparation of the draft SPD, and without them it has not been possible for the SPD to provide guidance on housing tenure mix. This could lead to differences in interpretation of affordable housing policy when the study does become available.

As a result of the consultation a number of minor changes were made to the SPD, as shown in the table above. However, as these changes do not relate to the objectives of the SPD, and therefore do not materially alter the purpose of the SPD, it is felt that they do not warrant the need to amend the Sustainability Appraisal.

The final SPD and its accompanying Sustainability Appraisal will be made available on the City Councils website following adoption.

For further information, please contact the Planning Policy Team as follows:

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Email: [policysurveys@cambridge.gov.uk](mailto:policysurveys@cambridge.gov.uk)



# Affordable Housing Draft SPD

## Appendix A - Summary of Representations on the SPD and Officer Assessment (Regulation 18 (4) (b) Statement)

Purpose

1.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<b><i>Purpose</i></b>				
<i>1.</i>				
3100 - Greenlands Residents Association	Object	<p>I have had occasion to talk to many nurses over the years, who said that it was good to get away from work and colleagues after work. (They lived together in accommodation built for Addenbrook nurses). So, a mix of jobs, please. Apart from that, I continue to be very concerned about the congestion on our roads, which will obviously increase with the number of buildings planned.</p> <p>Greenlands, of which I am one of the two directors, has continuous parking of 'Hospital workers' and 'visitors', (recently even on the pavement on 2 occasions). Addenbrooke's is now a "smoke free zone". Quiet a number come to Greenlands and leave cigarette stubs and litter.</p> <p>B. A. Pearson.</p> <p>PS. The road does not and cannot be cleaned because of this parking. Greenlands and Red Cross look a mess.</p>	Concerns noted.	
3242 - Trumpington Meadows Land Company 3317 - English Partnerships and Gallagher Longstanton Ltd.	Object	<p>Abandon SPD and replace with a joint SPD between Cambridge City and South Cambridgeshire District Councils. The SPD should be prepared jointly with South Cambridgeshire in order to ensure a consistent approach across the two local authority areas when considering major planning applications</p> <p>6. We note that South Cambridgeshire's LDS (April 2007-March 2011) recognises the need for this joint approach and timetables with Cambridge City Council and various other local authorities. It is not clear why Cambridge City Council has taken a different approach and opted to prepare its own Affordable Housing SPD especially when its own LDS 2007 states that it will produce its Affordable Housing SPD on a joint basis 'if possible'.</p> <p>7. We are encouraged by the emerging joint-working arrangement between the authorities, It is difficult to see how the local authorities will be able to agree the affordable housing requirements for major sites that span their boundaries if they are not referring to the same SPD, and that potential conflicts could occur as a result.</p>	Disagree because the production of an Affordable Housing SPD for Cambridge is provided for in the Cambridge Local Development Scheme. The policy approach towards affordable housing in the plans of the City Council and of South Cambridgeshire are very similar and so it can be expected that there will be a large degree of commonality between the affordable housing SPDs produced by the two authorities.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3133 - Cambridge University Hospital NHS Foundation Trust	Object	The document at paragraph 1, explains that the DPD will "expand" the Local Plan. As a matter of law, the SPD simply is not permitted to expand the requirement of the Local Plan. The SPD can only supplement and add detail to the approved Policies and contents of the Local Plan.	Disagree because paragraph 2.43 of PPS12 'Local Development Frameworks' states that SPD may expand policies.;	
3099 - Highways Agency	Support	The Highways Agency has no comment to make on the document.	Your support is noted.	
<i>1st Bullet</i>				
3162 - Various Cambridge Colleges	Object	<p>The Colleges agree with the essence of the first objective stated in para 2 of the SPD which states that the SPD would seek to:</p> <p>'Facilitate the delivery of affordable housing to meet housing needs.'</p> <p>o This key objective suggests that affordable housing should be all inclusive and should not exclude any particular housing need group, ie The Cambridge Colleges.</p> <p>The Colleges request that appropriate wording is added to the text of the SPD to accommodate the above point.</p>	Note support for the first objective of the SPD, the substantive point regarding the Colleges is considered elsewhere.	
<i>2nd Bullet</i>				
3118 - Marshall Group of Companies 3150 - Bidwells	Object	The most recent indication of planning policy in relation to affordable housing and employment sites is contained in the proposed changes to the Regional Spatial Strategy. Those changes exclude any such policy and textual reference. That lead should be taken and references should be removed from this SPD. We oppose the inclusion of the second objective which seeks to ensure that employment development mitigates its impact on the demand for housing. There is no provision within PPS3, PPG4 or Circular 6/98 for employment developments to contribute towards affordable housing provision in this manner. The impacts of employment developments upon affordable housing are not clear or easily established and should they arise at all, may vary significantly between different developments. We do not consider that any impacts could be shown to be directly related to such developments. This objective should be deleted from the document.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete 2nd bullet of the objectives.

**Representations****Nature Representation Summary****Council's Assessment****Change to Draft DPD****Status**

4.

3151 - Bidwells	Object	We are concerned that the proposed timetable for the adoption of the SPD will not allow for the full consideration of the representations submitted in response to this consultation exercise and whether amendments should be made to the draft SPD. This timetable does not reflect delays to the publication of the final version of RSS14 and adoption of the SPD should not take place before adoption of RSS14 to ensure that the document is consistent with the provisions of the final document and the strategic planning framework generally. The Council should therefore delay the adoption of the SPD accordingly.	Disagree because there is insufficient linkage between the SPD and the RSS to justify a delay to the SPD timetable.	
3134 - Cambridge University Hospital NHS Foundation Trust	Object	<p>The final wording of the RSS will clearly influence the SPD.</p> <p>The Trust understands that Policy 9/1 has not been saved. Para 9 of the SPD confirms that if the final RSS excludes any provision for employment developments to contribute towards affordable housing then the provisions of Policy 5/6 would not be defensible.</p> <p>The results of the SHMA are not yet known.</p> <p>Given these uncertainties, the draft DPD should be withdrawn and revised as necessary when the policy context is clear and the SHMA evidence in the public domain and can then be carefully examined.</p>	<p>Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.</p> <p>Disagree regarding the SHMA because the SPD has been drafted to allow the SHMA to be given weight in the decision making process when it does become available.</p>	Delete references relating to the implementation of policy 5/6 of the Local Plan.

***Representations******Nature Representation Summary******Council's Assessment******Change to Draft DPD******Policy Context***

7.

3311 - English Partnerships and  
Gallagher Longstanton Ltd.

Object

Policy Context

8 We are encouraged to note that the City Council recognise at Para 7 the needs to take in to consideration findings of the Strategic Housing Market Assessment as the key chapters are now likely to be available in the next few months, we would urge that the SPD is placed on hold to review this important information.

9. In the absence of the SHMA it is difficult to see how the Council can make a sound and informed judgement about detailed affordable housing requirements in the local authority area such as housing mix.

Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.

The SHMA evidence is not crucial to the provisions of the SPD because of the way it is written which will allow its main findings to be incorporated into an annexe and because it does not include new policy requirements that could only be supported through reference to SHMA findings. Paragraph 41 of the SPD makes it clear that in considering housing mix the findings of the SHMA will be particularly important.

Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>1st Bullet</i>				
3165 - Various Cambridge Colleges	Object	<p>The Colleges are concerned that the SPD seeks to apply a 75% proportion of new affordable housing to be social rented. This significant proportion wouldn't assist in meeting housing needs for Cambridge Colleges which will need to accommodate shared equity family housing for Fellows and Staff.</p> <p>The Colleges are seeking additional wording to the SPD, prior to adoption, making it clear that where special user groups require a higher proportion of shared equity housing that the Council will accommodate the specific requirements of The Colleges and allow the appropriate flexibility in the targets referred to in para 7 and para 13.</p>	<p>Concern noted. Policy 5/5 of the 2006 Local Plan and its supporting text paragraph 5.10 already allow for the identification of additional groups of key workers as being eligible for affordable housing where supported by evidence concerning recruitment difficulties, and housing need. In addition policy 9/7 of the Local Plan 2006 regarding NW Cambridge also provides for the affordable housing on that site to be in the form of key worker housing for University or College Staff.</p> <p>It follows that there is no need to amend the SPD in the manner proposed. If specific Colleges can demonstrate to the satisfaction of the decision maker in respect of a planning application that the provisions of the Local plan (Policy 5/5 and paragraph 5.10) should apply to them, then this would be satisfactory.</p> <p>Furthermore the Cambridge Housing Strategy at paragraph 5.5 provides for an exception to the 75% guidance figure where the affordable housing being provided is in the form of key worker housing and the land is owned by the key worker employer (see paragraph 13 of the SPD).</p>	
<i>2nd Bullet</i>				
3119 - Marshall Group of Companies	Support	<p>It is important that this SPD takes into account the most up to date and informed research into the housing market. Work is well advanced on the Strategic Housing Market Assessment. This SPD should await the publication of the Strategic Housing Market Assessment results, so that it is properly informed.</p>	<p>Your support is noted.</p>	
<i>8.</i>				
3130 - Bpha	Object	<p>How will this SPD relate to South Cambridgeshires SPD on sites which are being jointly promoted and developed by both Local Authorities?</p>	<p>The affordable housing policies of the two districts are very similar in general and identical where joint Area Action Plans are being prepared. It follows that the affordable Housing SPDs of each authority will be likely to exhibit a large degree of commonality and of approach.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3135 - Cambridge University Hospital NHS Foundation Trust	Object	There is no support for requiring employment developments to provide affordable housing in the currently approved RSS document. The fact that a revised RSS is in train may affect the outcome if it contains some support - but as is noted in paragraph 9, this depends upon whether Policy 9/1 of the Structure Plan is saved. The Trust understands that this policy has not been saved. There is therefore no policy context to support Local Plan Policy 5/6.	<p>Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.</p> <p>The SHMA evidence is not crucial to the provisions of the SPD because of the way it is written which will allow its main findings to be incorporated into an annexe and because it does not include new policy requirements that could only be supported through reference to SHMA findings.</p>	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3116	Object	The document would make more sense if the abbreviation RSS was explained rather than just being dropped in out of nowhere.	Agree that the full text of this abbreviation should be added after its first use.	Amend the SPD accordingly.
3259 - Home Builders Federation 3101 - Cambridgeshire County Council	Object	As the final RSS has not been adopted the text in the SPD needs to be amended to reflect this. The Government recently announced that the approved East of England Plan would be published in the autumn of 2007 at the earliest. In addition the Government has recently made its decision on which Structure Plan policies should be "saved". The Secretary of State's Direction which sets out which Structure Plan policies have been "saved" is available on the County Council's website. This paragraph should be amended to this effect.	Agree that the SPD should be updated to reflect the latest information regarding when the final RSS will be published and to clarify which policies of the Structure Plan have been saved.	Amend the SPD accordingly.
3215 - East of England Development Agency (EEDA)	Support	EEDA supports the provision of affordable housing in accordance with Council's Local Plan. The supply of homes, in particular affordable homes, is a significant constraint on economic growth and competitiveness and been identified as a major issue in the regional housing strategy.	Your support is noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
9. 3136 - Cambridge University Hospital NHS Foundation Trust	Object	There is no support for requiring employment developments to provide affordable housing in the currently approved RSS document. That a revised RSS is in train may affect the outcome if it contains some support - but as is noted in paragraph 9 this depends upon whether Policy 9/1 of the Structure Plan is saved. The Trust understands that this policy has not been saved. There is therefore no policy context to support Local Plan Policy 5/6 or the stated requirements set out in paragraphs 59 -65.	<p>Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.</p> <p>The SHMA evidence is not crucial to the provisions of the SPD because of the way it is written which will allow its main findings to be incorporated into an annexe and because it does not include new policy requirements that could only be supported through reference to SHMA findings.</p>	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3154 - University of Cambridge	Object	We agree that Cambridge Local Plan policy 5/6 should not be implemented if the approach is not contained in the final RSS and the relevant Structure Plan policy is not saved. The clear message from Government would be that planning policy should not seek affordable housing contributions from employment development, including academic and research development ? an approach that has never been explicitly supported by Government policy.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3246 - Trumpington Meadows Land Company 3312 - English Partnerships and Gallagher Longstanton Ltd.	Object	<p>We have been informed that Structure Plan Policy P9/1 is not on the list of saved policies received from GO-East by the County Council. In the absence of this and the uncertainty over the RSS referred to above we endorse the City Council's concerns over implementation. For the same reasons it should not be included as a policy in the emerging Core Strategy.</p> <p>It will be difficult to support and implement this policy where it is in conflict with the emerging RSS and saved Structure Plan policies as well as the affordable housing policies of the adopted Development Control Policies DPD for South Cambridgeshire. It is not supported by the Sustainability Appraisal which notes that such a policy could constrain economic development in the city. It fails on the fourth test of soundness.</p>	<p>Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.</p>	<p>Delete references relevant to the implementation of policy 5/6 of the Local Plan.</p>
3120 - Marshall Group of Companies	Support	<p>This paragraph makes it clear that the situation is fluid in relation to employment development having to contribute to affordable housing. At the very least the document should indicate that the policy requirement for employment development to contribute (if it is not taken out) will be revisited in the light of the publication of the final RSS.</p>	<p>Your support is noted. However, the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.</p>	<p>Delete references relevant to the implementation of policy 5/6 of the Local Plan.</p>
3102 - Cambridgeshire County Council	Support	<p>The Government has recently made its decision on which Structure Plan policies should be "saved" this does not include policy P9/1 which refers to employment development making provision for affordable housing in the Cambridge Sub Region.</p> <p>The County Council considers that Cambridge City Council would not be prevented from including this requirement as part of this SPD. Given that the guidance supplements an adopted Local Plan policy.</p>	<p>Support noted. However, the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.</p>	<p>Delete references relevant to the implementation of policy 5/6 of the Local Plan.</p>



<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>3rd Bullet</i>				
3167 - Various Cambridge Colleges	Support	<p>'A city that can meet its growing needs without jeopardising the environment or the interests of future generations'</p> <p>o We endorse this totally and assume by this that the City Council wants to continue to support the University, the Colleges and the significant part they play in the life of the City.</p> <p>The Colleges request that appropriate wording is added to the text of the SPD to accommodate the above point.</p>	Your support is noted.	
<i>11.</i>				
3152 - Bidwells	Object	The requirement for 75% of affordable housing to be social rented is considered inflexible and fails to reflect the range of different housing needs in different areas of the City or site specific circumstances. It is therefore considered that paragraph 13 of the SPD should be amended to emphasise that the 75% social rented target set out within the Housing Strategy is no longer appropriate.	Disagree because paragraph 13 of the SPD is simply recording the content of this existing Council policy document. The SHMA is likely to be published for consultation in December. This will demonstrate that the 75% target remains relevant and supported by the available evidence.	
3268 - Home Builders Federation 3260 - Home Builders Federation	Object	Reference to the Cambridge Housing Strategy cannot be applied as by the time the SPD is adopted this will be an out of date document. The Cambridge Housing study should not carry weight as it is at its end of life.	Disagree because the Cambridge Housing Strategy will remain until it is replaced, a document does not automatically become out of date just because it has reached the end of the period of coverage.	
3269 - Home Builders Federation	Object	To seek 75% social rented provision is not reflected in an planning policy and refer you to 'Cascades' which has recently been produced.	Disagree, paragraph 13 of the SPD is simply a statement of existing Council policy which it is reasonable to reflect in the SPD. Its operation will be subject to material considerations including the findings of the SHMA. Cascade provisions are already used in the City.	
<i>12.</i>				
3153 - Bidwells	Object	The requirement for 75% of affordable housing to be social rented is considered inflexible and fails to reflect the range of different housing needs in different areas of the City or site specific circumstances. It is therefore considered that paragraph 13 of the SPD should be amended to emphasise that the 75% social rented target set out within the Housing Strategy is no longer appropriate.	Disagree because paragraph 13 of the SPD is simply recording the content of this existing Council policy document. The SHMA is likely to be published for consultation in December. This will demonstrate that the 75% target remains relevant and supported by the available evidence.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>13.</i>				
3314 - English Partnerships and Gallagher Longstanton Ltd.	Object	<p>10. Paragraph 13 refers to the Cambridge Housing Strategy 2004 to 2007 in particular the stated aim to 'try to ensure that 75% of our new affordable housing is social rented' (page 28 of Housing Strategy). Again , it will be for the SHMA to define the appropriate tenure mix which will in turn inform the emerging Core Strategy in which such a policy should be set out.</p> <p>11. Furthermore, this Strategy has almost reached the end of its lifespan and is based on another 'old' document, the Cambridge City Council 2002 Housing Needs Survey which has also been used to inform the Draft SPD. We have previously at the Cambridge Local Plan Inquiry in November 2005, given evidence on this point.</p> <p>12. In the context of the Practice Guidance we submit that the Survey is coming to the end of its lifespan and is therefore of decreasing relevance to the local area. 'Local Housing Needs Assessment: A Guide to Good Practice' indicates that surveys should be updated every five to seven years (paragraph 3.4).</p>	Disagree because paragraph 13 is simply stating existing Council policy. The SHMA is likely to provide evidence that this approach remains valid.	
3261 - Home Builders Federation	Object	It is inappropriate to seek 75% social rented provision as this is not reflected in any adopted planning policy as the reference to PPG3 is outdated and replaced by PPS3.	Disagree because the reference to PPG3 was in the form of a quote from the Cambridge Housing Strategy.	
3155 - Bidwells	Object	The requirement for 75% of affordable housing to be social rented is considered inflexible and fails to reflect the range of different housing needs in different areas of the City or site specific circumstances. It is therefore considered that paragraph 13 of the SPD should be amended to emphasise that the 75% social rented target set out within the Housing Strategy is no longer appropriate.	Disagree because paragraph 13 of the SPD is simply recording the content of this existing Council policy document. The SHMA is likely to be published for consultation in December. This will demonstrate that the 75% target remains relevant and supported by the available evidence.	
3280 - Ashwell Developments Ltd	Object	The SPD should not seek to prescribe a set tenure mix nor is the tenure mix set out in the SPD justified. The tenure mix set out in paragraphs 13 and 39 should be deleted and instead the SPD should say that the tenure mix is a matter for application stage.	Disagree because paragraph 13 of the SPD is simply recording the content of this existing Council policy document. The SHMA is likely to be published for consultation in December. This will demonstrate that the 75% target remains relevant and supported by the available evidence.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3172 - Various Cambridge Colleges	Object	Provision is based on CHStrategy 2004-2007 soon to become obsolete.75% target too high a proportion of the total affordable housing because:The Colleges believe the number of key-worker dwellings is under-estimated because it excludes the needs of the University/Colleges;aspiration of key-workers is owner/occupation and shared ownership is more compatible with that need;this will have downward impact on land values preventing sites coming to market, or coming to market so as to avoid the affordable housing requirement;if Colleges are allowed to bring forward the housing required on their own land there should be no obstacles as to what form the housing takes.	Disagree that paragraph 13 should be amended. It is only stating existing Council policy. The findings of the SHMA are likely to support the policy requirement set out in the Cambridge Housing Strategy. Policy 5/5 of the 2006 Local Plan and its supporting text paragraph 5.10 already allow for the identification of additional groups of key workers as being eligible for affordable housing where supported by evidence concerning recruitment difficulties, and housing need. In addition policy 9/7 of the Local Plan 2006 regarding NW Cambridge also provides for the affordable housing on that site to be in the form of key worker housing for University or College Staff. It follows that there is no need to amend the SPD in the manner proposed. If specific Colleges can demonstrate to the satisfaction of the decision maker in respect of a planning application that the provisions of the Local plan (Policy 5/5 and paragraph 5.10) should apply to them, then this would be satisfactory. Furthermore the Cambridge Housing Strategy at paragraph 5.5 provides for an exception to the 75% guidance figure where the affordable housing being provided is in the form of key worker housing and the land is owned by the key worker employer (see paragraph 13 of the SPD).	
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<i>14.</i> 3251 - Anglian Water Services Limited	Object	The document does not make it clear as to which survey will be used to guide the SPD.	Comment noted. When it is published the SHMA will be the primary evidence base for affordable housing matters in Cambridge except in relation to matters which it has not yet examined.	
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<i>17.</i> 3146	Object	The use of the word "ghettos" is in itself best avoided. The local authorities should set an example of best practice utilising their own land to provide high standard affordable housing - zero carbon and no car facilities. In that cycle access and exceptional public transport connections are essential. equally poor agricultural land within 1 mile of the city centre should be acquired to develop mixed housing with a significant affordable content but not of the highest density. More internal private space and more external communal space should be the key criteria.	Concerns noted. Paragraph 17 includes a direct quotation from the good practice guide which uses the word "ghettos". The other matters are addressed in other planning documents and in national guidance.	

**Representations****Nature Representation Summary****Council's Assessment****Change to Draft DPD****Affordable Housing Need in Cambridge**

18.

3262 - Home Builders Federation 3243 - Trumpington Meadows Land Company	Object	Text refers to various out of date surveys. The City Council's HNS 2002 is not a sound basis for this SPD. It is near the end of its lifespan and fails to meet current Government guidelines.	Concerns noted. When Annex 2 of the SPD is added containing key findings from the SHMA (which will take place before publication) any unnecessary evidence base references will be deleted.	When Annex 2 of the SPD is added containing key findings from the SHMA (which will take place before publication) any unnecessary evidence base references will be deleted.
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19.

3147	Object	This data is hardly current and just not believable. It is difficult to pin down local demand when a high proportion of our housing supports a large catchment area. Of particular need will most certainly be dwellings for larger household formations. It is essential that the sub region is the focus of the provision rather than just the City. It is also necessary to support local employment rather than commuters to London.	Disagree, the research was undertaken by a recognised and competent national consultancy and no alternative evidence exists to challenge it. The Key Worker research from 2003 was done on a sub-regional basis.	
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3158 - Bidwells	Object	The paragraph refers to the need for 295 key worker units to be provided annually in Cambridge of which 247 would be generated by Addenbrooke's. It is considered that this requirement excludes the needs of the University and the Colleges, all of whom have staff who meet the definitions of key workers. In addition, many have low household incomes and are unable to afford the house prices in Cambridge. It is therefore considered that appropriate wording is added to the text of the SPD to accommodate the above point.	Disagree because paragraph 19 is simply stating the content of the 2003 research. Provision fo specific College staff can be made in accordance with policy 5/5 and supporting text paragraph 5.10 where recruitment diffiulties and need can be demonstrated.	
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**4th Bullet**

3176 - Various Cambridge Colleges	Object	<p>'295 key worker units annually in Cambridge of which 247 are generated by Addenbrooke's'.</p> <p>o The Colleges believe that this excludes the needs of the University and the Colleges – all of whom have staff who meet the definitions of key workers. In addition, many have low household incomes and are unable to afford the house prices in Cambridge.</p> <p>The Colleges request that appropriate wording is added to the text of the SPD to accommodate the above point.</p>	Disagree because paragraph 19 is simply stating the content of the 2003 research. Provision fo specific College staff can be made in accordance with policy 5/5 and supporting text paragraph 5.10 where recruitment diffiulties and need can be demonstrated.	
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<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>20.</i>				
3149	Object	Oh dear - 8731 suggests a high level of accuracy but again it is now 4 years out of date. What is needed urgently is some updated ball park derived demand relationship - a rough estimate that correlates well with known trends. Have a go	Concerns noted. The SHMA will supercede the findings of the Cambridge Sub-Region Housing Needs Survey 2003.	
3263 - Home Builders Federation	Object	It is not the role of surveys to dictate precise requirements but should help inform policy and negotiations as being one of number of evidence based documents.	Concern noted. Clearly the study was not making policy but setting out its findings and conclusions.	
<i>24.</i>				
3137 - Cambridge University Hospital NHS Foundation Trust	Object	In 2002 the then Addenbrooke's NHS Trust commissioned a report by the Cambridge Housing and Planning Research unit entitled "Addenbrooke's Staff Housing Needs Study" A copy of this document was provided to a wide range of stakeholders including the City Council at the time that it was published. Reference to this piece of work and its findings should be included in the SPD. Further copies of this report can be provided to the Council officers as necessary.	Concern noted. Officers are aware of the Staff Housing Needs Study 2002. It is not referenced in the SPD because the Key Worker Housing Research of 2003 addressed the needs arising from Addenbrooke's in more detail and is more up to date.	
3157 - University of Cambridge	Object	The Cambridge Local Plan and emerging North West Cambridge Area Action Plan already make an exception to the proposed affordable housing mix at the University's North West Cambridge site, where all of the affordable housing will be provided for University and college staff. That exception must be recognised in the SPD. (We see no reason why the exceptions for Anglia Ruskin University sites are set out in the SPD at paragraph 56, but not for the University of Cambridge site at North West Cambridge).	Disagree because the SPD only supplements the Cambridge Local Plan 2006 and does not replace it. Policy 9/7 clearly sets out the approach of the Local Plan towards the provision of affordable housing at NW Cambridge.	
3182 - Various Cambridge Colleges	Object	The Colleges believe this under-estimates volume of affordable housing need in the University because:It addresses University staff and doesn't cover College employed staff;Many academic staff are accommodated in College housing and are unable to afford market housing which blocks access to accommodation for new staff and makes moving to Cambridge less attractive for academics;Colleges would like to take part in Strategic Housing Market Assessment (SHMA).Although referred to in document it doesn't appear available publicly yet and so we are unable to ensure we're represented in the needs assessment.We question whether the consultation SPD is premature prior to publication of SHMA.	Disagree because Policy 5/5 of the 2006 Local Plan and its supporting text paragraph 5.10 already allow for the identification of additional groups of key workers as being eligible for affordable housing where supported by evidence concerning recruitment difficulties, and housing need. In addition policy 9/7 of the Local Plan 2006 regarding NW Cambridge also provides for the affordable housing on that site to be in the form of key worker housing for University or College Staff. It follows that there is no need to amend the SPD in the manner proposed. If specific Colleges can demonstrate to the satisfaction of the decision maker in respect of a planning application that the provisions of the Local plan (Policy 5/5 and paragraph 5.10) should apply to them, then this would be satisfactory.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
25. 3279 - Ashwell Developments Ltd	Object	The lack of SHMA is a serious flaw in the SPD and this consultation should be postponed until SHMA is available. The draft SPD should be revised once SHMA is available and there should then be a further consultation.	Disagree that the lack of the SHMA is a serious flaw to the SPD. The SPD has been written so as to be able to accommodate the findings of the SHMA when it is available. It is expected that the SHMA will support the approach taken by the SPD.	
3138 - Cambridge University Hospital NHS Foundation Trust 3161 - Bidwells 3183 - Various Cambridge Colleges	Object	<p>The document acknowledges that the SMA Strategic Housing Market Assessment is late and suggests that this will be included at Annex 2 later. This document should be central to preparing policy. It is not appropriate to retro-fit this kind of evidence into SPD. This evidence should be central to the preparation of the SPD to ensure accuracy and transparency. The Sustainability Appraisal (para 1.3.4 page 36) also highlights this deficiency.</p> <p>The draft DPD should therefore be withdrawn and revisited when the RSS SHMA are in the public domain at that time the implications can be carefully examined.</p> <p>We are concerned that the draft SPD has been published without the benefit of the findings of the Strategic Housing Market Assessment. This document is an essential part of the evidence base underpinning the consideration of affordable housing issues and it is therefore important that this is seen to inform the document and particularly the provisions in respect of housing and tenure mix. Consequently this document should be made available to the public prior to adoption of the SPD and further comments should be invited on the basis of the document's findings.</p> <p>We note that the findings of the Strategic Housing Market Assessment 2007 for the Cambridge sub-region are not yet available. The consultation document acknowledges that PPS3 requires local development documents to be informed by a robust evidence base, in particular the housing need and demand, through a Strategic Housing Market Assessment (SHMA). It would seem that without the findings of the SHMA for the Cambridge sub-region, the affordable housing SPD is premature.</p>	Disagree because the SPD has been informed by a robust evidence base. The SHMA will supplement, expand and replace part of that evidence base and key findings of which will be included in Annex 2 of the SPD. The SPD itself has been written to enable the findings of the SHMA to be taken into account in future decision making. Paragraph 41 indicates that the SHMA findings will be particularly important in the determination of an agreed mix of affordable housing. Annual updates will keep this information up to date. Paragraph 45 indicates that the SHMA will provide information on household incomes in Cambridge. Other parts of the SPD are not dependent upon the findings of the SHMA. It can be seen therefore that the SPD does not pre-empt the SHMA findings but rather makes provision for them to be taken into account in decision making.	
3148	Object	The word "robust" is overused and sadly a euphemism for anything other. Please therefore be more specific here as to what is intended by the word.	Noted. The word "robust" is drawn from a Government Planning Policy statement PPS3 Housing. Questions concerning the authors intent and purpose in using particular words such be addressed to the Government.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3264 - Home Builders Federation	Object	The SHMA will need to conform with Government guidance and need to be produced jointly with other stakeholders.	Noted.	
3241 - Trumpington Meadows Land Company	Object	<p>Change sought: Abandon SPD and replace with a joint SPD between Cambridge City and South Cambridgeshire District Councils.</p> <p>Reason: Lack of robust and up to date evidence means that the Draft SPD has no sound basis, contrary to the seventh test of soundness. The SHMA needs to be completed and judged to be robust before a SPD can be prepared; this should be prepared on a joint basis to ensure consistency in decision making. The accompanying SA warns about the risk that arises from not having a complete SHMA in place and it is of concern that this message has not been heeded.</p>	<p>Disagree because the SPD has been informed by a robust evidence base. The SHMA will supplement, expand and replace part of that evidence base and key findings of which will be included in Annex 2 of the SPD. The SPD itself has been written to enable the findings of the SHMA to be taken into account in future decision making. Paragraph 41 indicates that the SHMA findings will be particularly important in the determination of an agreed mix of affordable housing. Annual updates will keep this information up to date. Paragraph 45 indicates that the SHMA will provide information on household incomes in Cambridge. Other parts of the SPD are not dependent upon the findings of the SHMA. It can be seen therefore that the SPD does not pre-empt the SHMA findings but rather makes provision for them to be taken into account in decision making.</p> <p>The SPD will not be a Development Plan Document to which the tests of soundness apply.</p> <p>The issue of a joint SPD being produced with South Cambridgeshire has already been addressed.</p>	
3287 - St John's College 3250 - Anglian Water Services Limited	Object		<p>Disagree, because the SPD does not include new guidance which would need underpinning from the SHMA. The SHMA will be available shortly and is expected to support the provisions of the SPD. Key findings from it will be included in Annex 2 before publication. SPD are not a Development Plan Document and so are not subject to the tests of soundness. This is because they have to be in conformity with Development Plan policies which will all have been subject to public examination.</p>	
3103 - Cambridgeshire County Council	Object	<p>The findings of the Strategic Housing Market Assessment (SHMA) will be used to inform the preparation of the policies in the Cambridge City Development Plan Document(s). As such consideration should be given to reviewing this SPD in the light of any changes to the current approach to the delivery of affordable housing set out in the Cambridge City Local Plan 2006.</p> <p>It is therefore suggested that reference could be made to the need for a review of this SPD to take into account the findings of the SHMA.</p>	<p>Disagree, there is no need to flag up a possible review of the SPD in the SPD. If a review is needed one can be brought forward whether it is mentioned in the SPD or not.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3121 - Marshall Group of Companies	Support	It is critical that the SPD is not finalised until the findings from the SMHA are available. Those findings will be critical in informing policy formulation.	Your support is noted.	
3316 - English Partnerships and Gallagher Longstanton Ltd.	Support	Affordable Housing Need in Cambridge  15. Paragraph 25 explains the importance of the SHMA in the context of PPS3. We strongly agree with this. As indicated by the blank page at Annex 2 the key findings of the SHMA are not available at this time.	Your support is noted.	



**Representations****Nature Representation Summary****Council's Assessment****Change to Draft DPD****Supplementary Affordable Housing Requirements and Guidance****26.**

3139 - Cambridge University  
Hospital NHS Foundation Trust

Object The document at paragraph 26 explains that the DPD will "expand" the Local Plan. As a matter of law, the SPD simply is not permitted to expand the requirement of the Local Plan. The SPD can only supplement and add detail to the approved Policies and contents of the Local Plan.

Disagree, it is permissible for SPD to expand Development Plan policy. See references to SPD expanding plan policy in PPS12 "Local Development Frameworks" paragraphs 1.4 and 2.43.

**On Site/Off Site Provision and Financial Contributions**

3231 - Barton Willmore

Object Some sites mix of affordable may not be achievable and as such payment in lieu and off site provision may be more appropriate.

The SPD needs to look at the way in which the payment in lieu is calculated.

Disagree because the methodology for calculating the payment in lieu is set out in Annex 3 of the SPD. Payment direct to an RSL assumes a pre-allocation to a particular RSL which is not normal practice. Other comments noted.

The SPD should allow the payment to be transferred directly to the RSL rather than the council.

3257 - Anglian Water Services  
Limited

Support Agree that the off site provision for some sites may be necessary as there may be constraints or circumstances which would prejudice the delivery of the development.

Your support is noted.

**27.**

3164 - Bidwells

Object We note the suggestion that Commuted sums towards off-site provision of affordable housing, will only be considered where there is certainty that such an arrangement will actually result in provision of affordable housing. Given that it is for the Council to ring-fence this money and ensure that it is used appropriately to deliver affordable housing in the future, it would seem that it is the Council and not the developer that must give the commitment to certainty in these circumstances. This position should be clarified within the supporting text and paragraph 27 amended accordingly.

Disagree because as well as funding a development site must also be available, and the Council must be sure that such a site will be available (from whatever source), for the development, before it could agree to an off-site provision being made by way of a payment in lieu.

3219 - Petersfield Area  
Community Trust (PACT)

Object The provision of off site provision creating 'estates' of affordable housing is against principals of sustainable communities.

Disagree because any off-site provision would not necessarily be in the form of an estate but rather a small group or cluster.

3104 - Cambridgeshire County  
Council

Support Cambridgeshire County Council is supportive of the principle of providing on-site affordable housing unless exceptional circumstances apply.

Your support is noted.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<b>28.</b>				
3166 - Bidwells	Object	We note the suggestion that Commuted sums towards off-site provision of affordable housing, will only be considered where there is certainty that such an arrangement will actually result in provision of affordable housing. Given that it is for the Council to ring-fence this money and ensure that it is used appropriately to deliver affordable housing in the future, it would seem that it is the Council and not the developer that must give the commitment to certainty in these circumstances. This position should be clarified within the supporting text and paragraph 27 amended accordingly.	Disagree because as well as funding a development site must also be available, and the Council must be sure that such a site will be available (from whatever source), for the development, before it could agree to an off-site provision being made by way of a payment in lieu.	
3228 - South Cambridgeshire District Council	Object	Expand the area for off site provision to include large strategic sites to include Northstowe rather than just the fringe sites.	Agree because this would be consistent with the agreement between the City and South Cambridgeshire to take equal shares in the provision of new affordable housing provided in the urban extensions to the City (in both districts) and at Northstowe.	Add Northstowe to the permissible locations in paragraph 28.
3288 - St John's College	Support	Paragraph 28 of off site provision is supported as this allows flexibility as there maybe constraints or circumstances wick could prejudice the delivery of development.	Your support is noted.	
<b>29.</b>				
3168 - Bidwells	Object	We support the Council taking a flexible approach to the siting and provision of affordable housing within residential development schemes and particularly support the identification of clustering as an appropriate mechanism for the siting and delivery of affordable housing. However, we do have concerns with regard to pepper-potting. It is considered that this method of providing for the siting of affordable housing does not generally work and, in our experience, is not favoured by RSL's, tenants, developers or landowners. We therefore consider that pepperpotting should be deleted from paragraph 29 as an appropriate approach to the siting of affordable housing.	Note supportive comments. Disagree that pepperpotting should not be included as a mechanism for the delivery of affordable housing on site. Both pepperpotting and clustering are appropriate solutions and if developers wish to use pepperpotting they should not be discouraged from doing so.	
3114 - Cambridgeshire County Council	Object	Reference could also be made in the SPD to the findings of the "Balanced and Mixed Communities" Good Practice Guide.	Disagree because paragraphs 16 and 17 provide edited highlights of that study and it has influenced the content of the SPD in appropriate sections.	
3232 - Barton Willmore	Object	The details of more than 12 affordable dwellings in flatted developments should have access from a common stairwell or lift is arbitrary and without foundation.	Disagree because the difficulties of managing common parts increases with the the number of dwellings using them and especially when tenures are mixed. This guideline figure has been derived from the practical experience of officers with knowledge of property management.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3131 - Bpha	Object	The affordable housing should be evenly distributed throughout the site to include prominent parts.	Comment noted. The intention is that the affordable housing will be well distributed throughout a site including any prominent parts.	
3110 - Cambridgeshire County Council	Support	Cambridgeshire County Council is supportive of the principle of integrating affordable housing with open market housing	Your support is noted.	
<i>1st Bullet</i>				
3247 - Fairview New Homes Ltd 3289 - St John's College 3252 - Anglian Water Services Limited 3185 - Various Cambridge Colleges	Object	The distribution of affordable homes will incur costs to tenenats and pepper potting through a site is not a suitable option on developments. The distribution of affordable homes will incur costs to tenenats and pepper potting through a site is not a suitable option on developments. Pepper potting of affordable housing within development sites can prove to be difficult and see no reason why this has been included.	Disagree because pepperpotting is a valid approach and if developers wish to use this technique they should not be discouraged from doing so.	
3220 - Petersfield Area Community Trust (PACT)	Support	Pepperpot model is supported	Your support is noted.	
<i>2nd Bullet</i>				
3111 - Cambridgeshire County Council	Object	It is unclear why clustering is the usual approach followed in Cambridge and whether this is the preference of the City Council. The text should be amended to clarify this matter.	Comments noted. Clustering is the favoured approach of RSL primarily for management reasons. As RSL own and manage new affordable stock it would not be sensible to seek to impose a solution on them that they do not favour. That said, pepperpotting has been used elsewhere and could be used in the City where the agent which is to manage the affordable housing wants to mpursue this approach.	
3221 - Petersfield Area Community Trust (PACT)	Object	Clustering leads to social segregation and is not in keeping with sustainable communities	Disagree because clusters of between 6 and 25 dwellings will not lead to social segregation. The scale of the cluster will be dependent upon the size of the development and other site characteristics.	
3315 - English Partnerships and Gallagher Longstanton Ltd.	Support	Local Plan Policy 3/7 creating successful places  14. At Paragraph 29 we support the concept of using mixed tenures to create clustering	Your support is noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<b>30.</b>				
3244 - Trumpington Meadows Land Company	Object	Change sought: Provide further explanation in respect of exceptional circumstances and the 'buffering technique'.  Reason: This part of the Draft SPD lacks clarity. It fails to properly define those circumstances where provision off-site or by a financial contribution may be appropriate. Paragraph 30 fails to explain to the layman how the 'buffering technique' works and needs refining.	Disagree, adequate explanation of exceptional circumstances regarding off-site provision is given in Annex 3. No further explanation of how buffering could work can usefully be given in this SPD which is not a design guide. How affordable housing can best be integrated on-site will vary according to site characteristics and housing mix.	
3222 - Petersfield Area Community Trust (PACT)	Object	Buffering has no advantages	Disagree, this is the favoured approach of local Housing Associations for management reasons.	
<b>Design</b>				
3233 - Barton Willmore	Object	In some instances it may not be viable to meet all standards for affordable housing and Sustainable Design and Construction SPD.  Clarification is sought on the charges falling upon the affordable units as stated in the SPD.	Concerns noted. Policy 5/5 clearly states that viability will be taken into account in considering development proposals.	
<b>31.</b>				
3105 - Cambridgeshire County Council	Object	There is a need for greater clarity about why the provision of garages is excluded from the Design Standards.	This is because the Housing Corporation will not provide grant for the construction of garages.	
3224 - Petersfield Area Community Trust (PACT)	Object	If garages are excluded then provision of secure cycle parking should be mandatory. Also adequate parking provision for affordable housing should be provided.	Disagree because parking standards are as set out in the Local Plan 2006. These require parking for affordable housing units and market housing to be provided without distinction.	
3097 - Cambridgeshire Constabulary	Support	Care should be taken that excluding garage provision does not lead to the creation of large rear parking courts (serving more than 6-8 dwellings) with restricted natural surveillance and additional footpath links. The use of flats over garages in parking courts invites public access into what should be semi private space.	Your support is noted.	
3223 - Petersfield Area Community Trust (PACT)	Support	Affordable housing should not be inferior to market housing	Your support is noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<b>32.</b>				
3109 - Cambridgeshire County Council	Object	The Government has recently proposed to include Lifetime Homes standards as part of a mandatory rating against the Code for Sustainable Homes (The future of the Code for Sustainable Homes: Making a rating mandatory). This Consultation document should be taken into consideration when preparing the final version of the SPD.	Concern noted, however the SPD already requires affordable housing to be built to Lifetime Homes standards.	
3266 - Home Builders Federation	Object	The notion that affordable housing should meet lifetime homes standards is inappropriate via an SPD as there are cost and density implications.	Disagree because the provision of lifetime homes is important to house an ageing population. Government projections show that over the next 30 years the population aged 65 years and over will rise from 9.7 million to 16.5 million - a 70% increase. The percentage increase is even more dramatic for older age groups, with those aged 85 years and over rising by 149%. Government believes that the home building market is not reacting as quickly as necessary to meet these dramatic changes. If we do not act now to make sure that the homes we are building will meet the needs of an ageing population we will face increasing difficulties in meeting our population's needs over the coming decades. Accordingly Government is considering making the Lifetime Homes standard a mandatory element of the Code for Sustainable Homes at progressively lower star ratings over time.	
3265 - Home Builders Federation	Object	The text needs to clarify that Housing Corporation Design and Quality Standards are only applicable if the scheme is funded by Housing Corporation.	Disagree, the standards are of general applicability in providing satisfactory accommodation.	
3106 - Cambridgeshire County Council	Object	Reference is made in this paragraph to needs of disabled people. However no further guidance is provided in the Draft SPD in relation to the implementation of Policy 5/9 - Housing for People with disabilities.	Disagree because the SPD is not intended to provide guidance on the operation of policy 5/9.	
3225 - Petersfield Area Community Trust (PACT)	Object	Agree in principal but require the City Council to be more proactive to ensure all affordable housing meet Life Time Homes Standards.	Support noted. The SPD does support the provision of lifetime homes.	
<b>33.</b>				
3107 - Cambridgeshire County Council	Object	This paragraph should be revised to ensure that due regard should be had to all of the design considerations including adaptation to Climate Change as set out in the Sustainable Design and Construction SPD.	Disagree because the Sustainable Design & Construction SPD is a stand alone document - its provisions will apply irrespective of whether they are cross referenced.	
3226 - Petersfield Area Community Trust (PACT)	Object	Wording "Regard should be had.." seems weak and should be changed to "All affordable housing must comply with the provisions of the Sustainable Design & Construction Supplementary Planning Document to meet the challenges of climate change."	Disagree, because this wording is unnecessary, the Sustainable Design & Construction SPD stands alone and will not be strengthened by the proposed wording.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>34.</i>				
3285 - Ashwell Developments Ltd	Object	Paragraph 34 should be deleted as inappropriate and overly restrictive.	Disagree, paragraph 34 forms an essential component of the SPD and has been included because of experience elsewhere in the City in particular at the Belvedere site.	
<i>Qualifying Sites (Thresholds)</i>				
3234 - Barton Willmore	Object	The minimum standard for dwellings per hectare as set out nationally are set at 30 DPH however PPS3 allows for a lower figure and as such regards should be had to the character of the area and constraints of the site.  Sometimes there are multiple owners of sites and would be unfair to see them as one site to provide affordable housing.	Concerns noted but the approach of the SPD addresses a potential loophole to the operation of plan policy and is considered essential and not unfair as only a proportionate contribution is sought.	
<i>35.</i>				
3281 - Ashwell Developments Ltd	Object	Paragraph 35 should be amended so that it does not alter the sense of paragraph 5.12 of the Local Plan. The SPD should expand upon and clarify paragraph 5.12 of the Local Plan and should state that student accommodation will not be counted in the calculation of total residential provision for the purposes of assessing the affordable requirement.	Disagree, because paragraph 35 of the SPD does not depart from the meaning of paragraph 5.12 of the Local Plan 2006 in regard to student hostels. The City Council has never treated student units as equivalent to normal housing units. Accordingly it does not accept the provision of student units as meeting any affordable housing requirement on a site. However its existing policy and practice could usefully be set out in the SPD for clarity.	Add text to paragraph 55 of the SPD to confirm existing policy and practice to the effect that: 1. No affordable housing requirement will be generated by the development of accommodation for students (where secured by appropriate legal obligations), 2. Accommodation for students will not count as affordable housing and cannot contribute to meeting the affordable housing requirement on a development site.
3217 - Windsor Road Residents (WIRE)	Object	Affordable housing on smaller sites	Concern noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3156 - University of Cambridge 3170 - Bidwells 3186 - Various Cambridge Colleges	Object	<p>The paragraph states that the policy does not apply to sites where the only development to be provided will be in the form of a student hostel. It is considered that this exemption should be extended to flatted developments which will be occupied exclusively by post graduates, research Fellows and other academic staff with their families since The Colleges have an increasing demand for family accommodation but they do not house families within their normal student hostel accommodation. It is therefore requested that appropriate wording is added to the text of the SPD to accommodate the above point. Any form of college housing accommodation should be exempt, including housing for families.</p> <p>Delete 'but not to sites'.student hostel? and replace with 'but not to sites where housing development is solely for collegiate purposes'.</p>	Disagree because the SPD cannot amend the Local Plan 2006 in the manner proposed. In addition Policy 5/5 of the 2006 Local Plan and its supporting text paragraph 5.10 already allow for the identification of additional groups of key workers as being eligible for affordable housing where supported by evidence concerning recruitment difficulties, and housing need. In addition policy 9/7 of the Local Plan 2006 regarding NW Cambridge also provides for the affordable housing on that site to be in the form of key worker housing for University or College Staff. It follows that there is no need to amend the SPD in the manner proposed. If specific Colleges can demonstrate to the satisfaction of the decision maker in respect of a planning application that the provisions of the Local plan (Policy 5/5 and paragraph 5.10) should apply to them, then this would be satisfactory.	
<b>36.</b>				
3258 - Anglian Water Services Limited	Support	The inclusion of existing on site dwellings in calculating the provision of affordable housing is an approach that is fair and equitable and avoid sites that use the land inefficiently to avoid the provision of affordable housing.	Your support is noted.	
3290 - St John's College	Support	The methodology of calculating the affordable housing provision taking into account existing on site dwellings is a welcomed approach.	Your support is noted.	
3188 - Various Cambridge Colleges	Support	We welcome reference within paragraph 36 of the SPD to account for existing on-site dwellings in calculating levels of affordable housing to be provided. We agree that this approach can help to avoid proposals which deliberately make inefficient use of land in avoiding affordable housing provision. The added benefit of this approach, is that it must be considered only fair and equitable that existing provision at a site is taken into account.	Your support is noted.	
<b>37.</b>				
3267 - Home Builders Federation	Object	It should also be noted that larger family sized homes are to be provided and thus density assumptions should take this into account.	Comment noted.	
3218 - Windsor Road Residents (WIRE)	Object	30 dph is a minimum density target	Noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<b>38.</b>				
3113 - Cambridgeshire County Council	Object	Reference is made in this paragraph to the need to avoid the artificial sub-division of sites. Given the importance of this issue it is suggested that the guidance provided in the Draft SPD should be expanded.	Disagree because the guidance given in the SPD is clear and comprehensive.	
<i>Agreed Mix of Affordable Housing</i>				
3235 - Barton Willmore 3245 - Trumpington Meadows Land Company	Object	75% socially rented has not been justified, should be determined on a site by site basis. Also need to recognise the role of intermediate housing. Housing mix needs to be considered on a site by site basis, with regard to assessments the council needs to be sure that the document is robust and credible as to afford it weight.  Inclusion of preferred tenure mix is not supported by robust evidence. It is not appropriate content for a SPD and reduces scope for flexibility in the implementation of the Local Plan policy, contrary to the ninth test of soundness. Mix should be determined by the emerging SHMA and incorporated into the Core Strategy. It should be applied on a site-by-site basis subject to a range of considerations and planning objectives which should be clearly defined.	Disagree. The Local Plan 2006 and by inference the SPD already recognise the role of intermediate housing. The 75% social rented target is an existing Council policy objective, however as the SPD states at paragraphs 39, 40 and 41 regard will be had to all material considerations relevant to mix and particularly to the findings of the SHMA.  Tests of soundness do not apply to the SPD as it is not a Development Plan Document.	
3310 - English Partnerships and Gallagher Longstanton Ltd. 3308 - English Partnerships and Gallagher Longstanton Ltd. 3318 - English Partnerships and Gallagher Longstanton Ltd.	Object	Concerns about: Adequacy of the evidence to support a 75% social rented target. The need for negotiations on a site by site basis. Regard to be had to all material factors affecting delivery. The need to retain flexibility in approach.	Disagree. The 75% social rented target is an existing Council policy objective, however as the SPD states at paragraphs 39, 40 and 41 regard will be had to all material considerations relevant to mix and particularly to the findings of the SHMA. The target is not included in a planning policy document and has not been subject to public examination, it follows that the weight to be attached to it by decision makers will depend upon the degree to which it is supported by evidence. In this regard it is likely that the SHMA will confirm the great need for additional social rented housing in the City.	



<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<b>39.</b>				
3122 - Marshall Group of Companies 3171 - Bidwells	Object	In this area around Cambridge, the well-being of the economy and its growth potential is important nationally. Affordable housing should be split between socially rented and intermediate tenure, on a 50/50 basis.  The agreed affordable housing mix in each development should be based upon an up to date assessment of housing needs and should also take account of local circumstances. The 75% social rented requirement is unnecessarily inflexible and is not based upon the findings of the Council's Strategic Housing Market Assessment. Paragraph 39 should therefore be amended by deleting the 75% social rented requirement and replacing it with text providing for a more flexible approach which takes account of the nature and location of the development but also having regard to the findings of the SHMA.	Disagree because the 75% social rented target is existing Council policy. Regard will also be had to the findings of the SHMA and other material considerations as spelled out in paragraphs 40 and 41 of the SPD and in the policies of the Local Plan 2006 and other local Development Plan Documents.	
3229 - South Cambridgeshire District Council	Object	Clarification on the term local in paragraph.	The word local in paragraph 39 primarily relates to need arising from within Cambridge although in relation to the main urban fringe sites it will also relate to need arising from within South Cambridgeshire in recognition of the overall housing market area and the agreement to share affordable housing provision on these sites and at Northstowe.	
<i>1st Bullet</i>				
3189 - Various Cambridge Colleges	Object	'75% social rented housing' o Please note our Objections to para 13.  The Colleges request that appropriate wording is added to the text of the SPD to accommodate the points made to para 13.	A substantive response has been made elsewhere.	
<b>40.</b>				
3248 - Fairview New Homes Ltd	Object	Restricting the housing development and going beyond the normal responsibilities of planning and the original Town and Country Planning Act.  Will restrict developers from reacting to the market and are not in a position to make decisions on factors like development surveying etc.	Disagree because the guidance in paragraph 40 of the SPD is not intended to reduce flexibility but is simply a statement that regard will be had to the wider locality as one material consideration to be considered amongst others.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3270 - Home Builders Federation	Object	Market conditions should be considered as this may lead to sites not being built out if the market conditions are not right.	Disagree because market conditions are best known to the developer. The details of planning proposals can be amended to provide a better fit to market conditions if necessary. The plan already allows account to be taken of viability.	
3230 - South Cambridgeshire District Council	Object	Clarification on the term local in paragraph.	The word local in paragraph 40 primarily relates to need arising from within Cambridge although in relation to the main urban fringe sites it will also relate to need arising from within South Cambridgeshire in recognition of the overall housing market area the fact that the City boundary passes through some of the development sites and the agreement to share affordable housing provision on these sites and at Northstowe.	
3140 - Cambridge University Hospital NHS Foundation Trust	Support	The extract from the Local Plan does not include the rider to Policy 5/6 explaining that key worker employers such as the Cambridge University Hospitals NHS Foundation Trust who already provide key worker accommodation should be exempt from this requirement. This section of Policy 5/6 – if it is to be retained- should be included within the text of the SPD to make this position clear.	Your support is noted. The full text of policy 5/6 can be found at Annex 1 of the SPD.	
3117 - CPRE	Support	We think the paragraph should include a reference to the need to create mixed sustainable communities with mixed tenure and age profile, so that there is not a predominance of infant and primary school children requiring schools for their age group who, when they grow up, then create the need for secondary schools, leaving the pre-school and primary schools under-occupied. Also the social mix should not be dominated by young families and middle-aged households but include housing for retired people. We hope the policy would be implemented with sensitivity.	Support noted. Paragraph 54 of the SPD addresses the matters raised in your representation. The City Council is preparing an Older Persons Housing Strategy and aims to adopt it in November 2008.	
3123 - Marshall Group of Companies	Support	The indication that regard will be had to housing mix in adjacent existing areas when determining the level of affordable housing on new sites, is to be welcomed. In circumstances where the ambition is to ensure that the new urban extensions embrace and improve existing areas, that approach is justified.	Your support is noted.	
3173 - Bidwells	Support	We agree with the suggested approach outlined in paragraph 40 whereby the City Council will use the most up to date information available on local needs to inform its negotiations on affordable housing mix. However, we would stress that this seems to run counter to the provisions of paragraph 39 above and it is important that the Council clarifies this inconsistency to ensure that developers are fully aware of the Council's requirements in terms of affordable housing provision from the outset.	Your support is noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>41.</i>				
3271 - Home Builders Federation	Object	The text fails to add whether or not public funding would be available when determining the mix, if not, then a cascade mechanism may be better suited.	Disagree because these matters are addressed in paragraphs 49 and 50 of the SPD.	
3177 - Bidwells	Object	The findings of the Strategic Housing Market Assessment are important to the determination of an agreed mix of affordable housing. We are concerned that this has not been provided from the outset and that the draft SPD has been published for public consultation without the benefit of this essential supporting evidence. We would question as to whether this approach is sound having regard to the provisions of PPS12 and the requirement that the evidence base is prepared and publicly available at the earliest stage of the production of documents. This should be made available prior to adoption.	Disagree because the SPD has been written in the light of available evidence and so as to be able to fully take account of the SHMA when it is available.	
<i>Definition of Affordable Housing and Types</i>				
3282 - Ashwell Developments Ltd	Object	The SPD should be amended to allow greater flexibility on a site by site basis regarding tenure split including the provision for key workers. Spd should acknowledge that certain locations provide particular benefit for key workers.	Disagree, neither paragraph 40 or the Local Plan is intended to provide an exhaustive list of all material considerations to be considered regarding tenure split issues. The Key Worker Study from 2003 (referenced at paragraph 19 of the SPD) observes that key workers do not necessarily always want to live close to their place of work and that they cannot be considered to be an homogenous group all wanting similar housing. Key worker families for example want different types of housing in different locations from young single key workers.	
<i>44.</i>				
3292 - St John's College 3254 - Anglian Water Services Limited	Object	Paragraph 5.9 refers specifically to the income thresholds for intermediate housing provided for specific groups of key workers. The actual groups provided for from site to site would need to be consistent as the income profiles of these groups vary significantly. An inconsistent approach would therefore have varying impacts on values from site to site - this would lead to uncertainty and would not represent the fairest approach to key worker housing provision.	Disagree, the key point is to ensure that affordable housing for any specific group of key workers is affordable to that specific group. This will vary in the same way that incomes vary across the local economy. The purpose of the policy is to provide affordable housing for disparate needs not to simplify site value calculations.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3179 - Bidwells 3190 - Various Cambridge Colleges	Object	<p>The definition of key worker housing as provided by paragraph 5.10 of the Local Plan should be extended to ensure that University and College academic, teaching and other staff are included in the register of key workers eligible for nomination for key worker affordable housing. We therefore request that appropriate wording is added to the text of the SPD to accommodate the above point. Refers to parts of the Local Plan upon which we would like to comment:</p> <p>o Local plan 5.10 ? we would like to ensure that University and College academic, teaching and other staff are included in the register of key workers eligible for nomination to affordable housing.</p> <p>The Colleges request that appropriate wording is added to the text of the SPD to accommodate the above point.</p>	<p>Concerns noted. The SPD cannot amend the text of or make new policy for the 2006 Local Plan in the way proposed. Policy 5/5 of the 2006 Local Plan and its supporting text paragraph 5.10 already allow for the identification of additional groups of key workers as being eligible for affordable housing where supported by evidence concerning recruitment difficulties, and housing need. In addition policy 9/7 of the Local Plan 2006 regarding NW Cambridge also provides for the affordable housing on that site to be in the form of key worker housing for University or College Staff. It follows that there is no need to amend the SPD in the manner proposed. If specific Colleges can demonstrate to the satisfaction of the decision maker in respect of a planning application that the provisions of the Local plan (Policy 5/5 and paragraph 5.10) should apply to them, then this would be satisfactory.</p>	
3159 - University of Cambridge	Support	<p>The University agrees that key worker housing provision in Cambridge should not be limited to those qualifying for access to Government HomeBuy scheme or its Key Worker Living programme. There are a large number of key workers in housing need in Cambridge, including University and College staff, that are not included in the Government's narrow definition used for Housing Corporation funded schemes. It is essential that the University and Colleges are able to bring forward affordable housing for their staff on sites that they control or own and through other delivery mechanisms.</p>	<p>Your support is noted.</p>	
45. 3210 - University of Cambridge	Object	<p>The SPD should identify the mechanisms that the Council intends to employ to implement the criteria for intermediate housing affordability as set out in Cambridge Local Plan paragraph 5.9, where the affordable housing is to be owned and retained by a body other than an RSL (e.g. in employer-led affordable housing schemes), at both the planning application stage and after development has been completed.</p>	<p>Disagree, these are matters of detail to be resolved in respect of individual planning applications and are likely to vary from site to site and as time passes. They will be detailed and secured through the use of planning obligation agreements. It is for those proposing to include intermediate housing in developments to provide evidence of household incomes whether generally or for specific groups of key workers, so that it can be assured that the housing will be affordable. Mechanisms will also have to be agreed to ensure that the affordable housing is secured over the long term. These matters can be secured by various means and it would not be prudent to try to set these matters out in advance.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>46.</i>				
3273 - Home Builders Federation	Object	Any requirements that constitute particular types of affordable housing must be in compliance with national guidance.	Comment noted.	
<i>Amount of Affordable Housing</i>				
3236 - Barton Willmore	Object	The way in which the financial viability appraisal is calculated and the fact that the process of keeping this sensitive information private is an issue. May need to look at calculating affordable housing on habitable rooms rather than dwellings may provide larger units.	Disagree because if consideration is to be given to viability claims sufficient information must be produced by the developer to enable an assessment to be made. Any detailed information provided will be treated as commercially sensitive. The Local Plan and the RSS are all built around assessments of dwellings and not in relation to habitable rooms.	
3274 - Home Builders Federation	Object	The release of accounting information is a sensitive area and the Council need to reevaluate this in accordance with 1 app and as such will not be able to require further information than this.	Disagree because the need for extra information concerning development viability would only occur if a developer claimed that a scheme was not viable. Only then would the extra information set out in paragraphs 48 to 50 of the SPD be required. It follows that the guidance given in paragraph 48 remains relevant such a submission could accompany an application or be submitted at a later date.	
3309 - English Partnerships and Gallagher Longstanton Ltd.	Object	24 At Para's 49, 50 and 51 ,we do not understand the need for further financial appraisal in relation to the needs of Northstowe, when the authorities already have commissioned an independent expert to advise them on this as stated in the Cambridge Horizons growth area funding bid document dated September 2007 (Page 28)	Noted. Paragraph 48 does not state that the viability assessment work done for Northstowe or any other major development will be set aside (see second sentence of paragraph 48).	
<i>47.</i>				
3192 - Various Cambridge Colleges	Object	'The provision of affordable housing will affect the value of land for residential development but will not generally render it uneconomic.'  Please refer to our comments on para 13 above.  The Colleges request that appropriate wording is added to the text of the SPD to accommodate the above point.	Disagree because policy 5/5 of the Local Plan requires considerations of viability to be taken into account. There is no need to amend the SPD.	
3124 - Marshall Group of Companies	Support	The acknowledgement in this paragraph that the circumstances of individual cases may support a lower provision of affordable housing, on viability grounds, is welcomed.	Your support is noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
48.				
3181 - Bidwells	Object	It is essential that any financial appraisal of a site must take account of the costs of relocating businesses and business risk of relocation. Unless these are taken account of, these sites will not be developed and will not provide affordable housing, or indeed market housing to meet the Council's overall housing requirement. A realistic approach is therefore required from the Council if it is to deliver new housing to meet the City's requirements. It is therefore considered that paragraph 48 should be amended accordingly.	Comments noted. Disagree that any changes are required to the SPD because paragraph 48 already states that account should be taken of all development costs in assessing the viability of development. The Local Plan has accepted this principle and explicitly says so in relation to Cambridge East at paragraph 9.19.	
3160 - University of Cambridge	Object	The Housing Corporation development appraisal is not relevant to schemes with no Housing Corporation funded affordable housing, such as the University's proposed development at North West Cambridge. Bespoke appraisal models will need to be agreed for such developments.  Insert text as follows: The methodology, underlying assumptions and software used to undertake this appraisal should be agreed, with a default for schemes attracting Housing Corporation funding being the current methodology endorsed by the Housing Corporation.	Agree because the Housing Corporation Economic Appraisal Tool is explicitly intended for use regarding schemes involving Social Housing Grant.	Amend the text of paragraph 48 as proposed in this representation.
3129 - Marshall Group of Companies	Object	Issue is taken with the 40% level. It is not solely a matter of viability. Weight must be given to characteristics of adjacent neighbourhoods which, at Cambridge East, have high proportions of affordable housing in the form of council housing or former council housing.  Cambridge East has a reputation of being the poor relation in terms of the quality of existing housing. The lower the percentage of affordable housing, the greater is the chance of overcoming that preconception.  The required volume of affordable housing in Cambridge places great strain on resources. Funding will be a continuing problem.	Disagree because the SPD cannot change Local Plan policy and the 40% figure is derived from policy 5/5 of the 2006 Local Plan. Policy 5/5 already allows the factors raised by the representation to be taken into account.	
3115 - Cambridgeshire County Council	Object	Consideration should be given to whether more than one valuation should be undertaken as part of this process.	Disagree, this would be likely to further complicate and delay the planning obligation process.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3249 - Fairview New Homes Ltd	Object	The methodology of calculating affordable housing viability is flawed and should be a system of a better methodology to reflect the actual situation.	Disagree that viability assessments should be based only upon the actual price paid for a site with no account being taken of the value of a site in its existing use. Adopting such a methodology would allow developers to make unrealistic assessments of residual land values which did not fully take into account the full costs of development (including affordable housing costs) and use this as a basis for reducing the overall level of planning obligations. Furthermore the existing use value is also needed to check scheme viability where a residual land value is close to or lower than the existing use value.	
3193 - Various Cambridge Colleges	Object	<p>'The provision of affordable housing will affect the value of land for residential development but will not generally render it uneconomic.'</p> <p>Please refer to our comments on para 13 above.</p> <p>The Colleges request that appropriate wording is added to the text of the SPD to accommodate the above point.</p>	Disagree because policy 5/5 of the Local Plan requires considerations of viability to be taken into account. There is no need to amend the SPD.	
<i>50.</i>				
3184 - Bidwells	Object	It is considered that this paragraph should further take account of the need for flexibility where it would be in the interests of securing other planning objectives within the Local Plan. This will ensure consistency with the provisions of paragraph 61 of the document. The paragraph should therefore be amended accordingly.	Disagree because the interests of securing other planning objectives is already provided for in policies and supporting text of the Local Plan, it does not need to be repeated.	
<i>51.</i>				
3275 - Home Builders Federation	Object	The issue of availability or grant funding to deliver affordable housing and it is unreasonable that the Council do not consider this in the SPD.	Disagree because not all schemes will obtain grant funding but this in itself cannot be a reason why no affordable housing should be provided in a scheme.	
<i>52.</i>				
3283 - Ashwell Developments Ltd	Object	Paragraph 52 of the draft SPD speaks in terms of 'the recycling benefit'. Paragraph 72 of the Government guidance 'Delivering Affordable Housing' advises that it is public grant funding which is required to be recycled and this distinction should be made clear in the draft SPD.	Disagree. If such safeguards are not included in the SPD there would be likely to only be a short term benefit from any affordable housing provided through the planning system.	
3227 - Petersfield Area Community Trust (PACT)	Support	Support the principal that affordable housing is made available over a long term period and secured legal safeguards are in place to stop them becoming investments.	Your support is noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<b>53.</b>				
3284 - Ashwell Developments Ltd	Object	SPD should make clear that housing need (and its influence on occupancy) is a matter to be settled at application stage taking into account current circumstances including an up to date and relevant housing needs survey.	Disagree that any changes are needed to the SPD which already allows for other agreed registers of need to be taken into account as well as that administered by the City Council.	
3213	Object	Limiting affordable housing to those in housing need ignores the needs of the large number of young professionals who are unable to afford to buy houses in Cambridge or the surrounding area and consequently have to rent with relatively little security of tenure (under standard Assured Shorthold Tenancies the landlord can give 2 months notice for a tenant to leave without needing any reason).	Disagree because if no substantive housing need exists it would be wrong to allow access to affordable housing as it would prevent persons in actual housing need having access to that housing.	
3125 - Marshall Group of Companies	Object	The indication at paragraph 53 that the occupation of affordable housing will be limited to those specified in paragraph 5.11 of the Local Plan could usefully be extended to include a reference to those people, particularly key workers, referred to in paragraph 5.10 of the Local Plan.	Disagree because registers of need can be agreed as needed - such as with the zone agent providing key worker housing in the sub-region (BPHA). Other registers are likely to be required such as one with Cambridge University to implement policy 9/7 of the 2006 Local Plan.	
3187 - Bidwells 3195 - Various Cambridge Colleges	Object	The definition of those in housing need specified in paragraph 5.11 of the Local plan confirms that these will include those nominated from other registers of housing needs as agreed by the City Council. It is considered that the registers of housing need should include a register set up and managed by the University and the Colleges and that people on College registers should take priority for allocation of housing on sites that The Colleges control or own. It is requested that appropriate wording is added to the text of the SPD to accommodate the above points.	Concerns noted. In respect of the Colleges, policy 5/5 of the 2006 Local Plan and its supporting text paragraph 5.10 already allow for the identification of additional groups of key workers as being eligible for affordable housing where supported by evidence concerning recruitment difficulties, and housing need. In addition policy 9/7 of the Local Plan 2006 regarding NW Cambridge also provides for the affordable housing on that site to be in the form of key worker housing for University or College Staff. It follows that there is no need to amend the SPD in the manner proposed. If specific Colleges can demonstrate to the satisfaction of the decision maker in respect of a planning application that the provisions of the Local plan (Policy 5/5 and paragraph 5.10) should apply to them, then this would be satisfactory.  The methodology for how the provisions of policy 9/7 would work in practice has yet to be formulated and agreed between the local authorities involved and the University. It will be secured through a planning obligation. A specific register of housing need will almost certainly be required as part of this methodology. Similar principles would also apply to any separate Colleges register.	



<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>54.</i>				
3237 - Barton Willmore	Object	Clarification is required regarding what is meant in paragraph 54 by 'local lettings policies'.	Local lettings policies are usually intended to help the delivery of balanced and sustainable communities over the short, medium and long term in terms of child densities, economic activity rates etc. So on first letting a degree of underoccupation can be built in and care given to ensure that overconcentrations of those without work are avoided.	
<i>57.</i>				
3163 - University of Cambridge	Object	Reference to North West Cambridge in note 5 should apply only to land between Huntingdon Road and Histon Road. No social affordable housing or other Housing Corporation funded housing is proposed at the University's site between Madingley Road and Huntingdon Road at North West Cambridge.	Agree that this would improve the accuracy of the SPD.	Insert the word "between Huntingdon Road and Histon Road" at the end of note 5.
3216 - Windsor Road Residents (WIRE)	Object	Clarification on the coverage of North West Cambridge site i.e. is NIAB development included.	The reference is only concerned with the NIAB development.	
<i>58.</i>				
3132 - Bpha	Object	If the affordable housing is developed without grant will this have an impact on the design and quality as The Housing Corporation's Standards may not be mandatory or will Lifetime homes	Concern noted. paragraph 32 of the SPD states that Design and Quality standards should be met in affordable housing developments. Lifetime Home standards are likely to become mandatory over the next few years as part of the code for sustainable homes.	
<i>59.</i>				
3191 - Bidwells 3207 - Bidwells	Object		Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3141 - Cambridge University Hospital NHS Foundation Trust	Object	The extract from the Local Plan does not include the rider to Policy 5/6 explaining that key worker employers such as the Cambridge University Hospitals NHS Foundation Trust who already provide key worker accommodation should be exempt from this requirement. This section of Policy 5/6 – if it is to be retained- should be included within the text of the SPD to make this position clear.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3307 - English Partnerships and Gallagher Longstanton Ltd.	Object	Local Plan Policy 5/6  As noted above, it will be difficult to support and implement this policy where it is in conflict with the emerging RSS, saved Structure Plan policies and the affordable housing policies of the adopted Development Control Policies DPD for South Cambridgeshire. It is not supported by the Sustainability Appraisal which notes that such a policy could constrain economic development in the city.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.	
3126 - Marshall Group of Companies	Object	The most recent indication of planning policy in relation to affordable housing and employment sites is contained in the proposed changes to the Regional Spatial Strategy. Those changes exclude any such policy and textual reference. That lead should be taken and references should be removed from this SPD.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3169 - University of Cambridge	Object	The University maintains its objection to this policy and to its proposed adoption through the SPD. The approach has no explicit support from central Government policy.  Pressures on the housing market are being addressed through the release of land from the Green Belt for housing development and the provision of a high target level of provision of affordable housing at those sites.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>Relevant Employment Developments</i>				
3209 - University of Cambridge	Object	If Local Plan policy 5/5 is to be implemented,(and the University maintains that it should not be implemented), the SPD should identify the mechanisms by which the employment developer's affordable housing contribution provides affordable housing for the employers at that development. Contributions should not be used to provide housing to meet needs not generated by that development.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
<i>60.</i>				
3194 - Bidwells	Object	The requirement for new employment developments to contribute to the provision of affordable housing is not supported by any guidance within PPG4, PPS3 or Circulars 5/05 and 6/98. Should Structure Plan Policy 9/1 not be saved there will be no support for this policy approach at Regional level either. As such, we do not believe that this requirement can be justified under wider Government or Regional Policy and we therefore object to the provisions of paragraphs 59-65. These paragraphs should be deleted.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3238 - Barton Willmore	Object	It is understood from this section that mixed use developments are not to be included in mixed use developments.  Inappropriate to seek affordable housing in such schemes as it may have implications on viability and mixed and balanced communities.	Agree as far as is relevant to do so because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3142 - Cambridge University Hospital NHS Foundation Trust	Object	<p>The Trust is anxious to ensure that Policy makers with the Council understand that community services respond to population growth and do not generate growth. It is new housing (ie the population) that gives rise to new patients; and if there is an increase in patient demand the Trust has to expand its facilities to meet that demand.</p> <p>Where new housing gives rise to the need for mitigating affordable housing, the Trust expects the housebuilder/developer to negotiate the provision of a proportion to be allocated to key workers. That is the proper way to mitigate the population-growth impacts.</p>	Disagree because the applicability of the policy is fixed and cannot be changed by the SPD.	
3127 - Marshall Group of Companies	Object	The most recent indication of planning policy in relation to affordable housing and employment sites is contained in the proposed changes to the Regional Spatial Strategy. Those changes exclude any such policy and textual reference. That lead should be taken and references should be removed from this SPD.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
<i>How to Calculate the Mitigation Payment</i>				
3174 - University of Cambridge	Object	The Council should not seek contributions from University and related academic and research developments. Unlike most other Class B employment development, and other employment generating development that is not targeted by the SPD (for example retail development), academic and institutional research uses are typically funded from the public purse; private endowments normally fund only research and building costs, not additional s106 costs, which are paid from the University chest at the expense of its core academic and research work; little or no uplift in land value is achieved, and any uplift is rarely realised as the University retains land ownership.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>61.</i> 3203 - Bidwells	Object	The requirement for new employment developments to contribute to the provision of affordable housing is not supported by any guidance within PPG4, PPS3 or Circulars 5/05 and 6/98. Should Structure Plan Policy 9/1 not be saved there will be no support for this policy approach at Regional level either. As such, we do not believe that this requirement can be justified under wider Government or Regional Policy and we therefore object to the provisions of paragraphs 59-65. These paragraphs should be deleted.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
<i>62.</i> 3175 - University of Cambridge 3143 - Cambridge University Hospital NHS Foundation Trust	Object	This paragraph explains that a development creating 100 new jobs "is considered" to be a suitable threshold. There is no evidence to support this notion.  This section goes on to consider how hospitals and Education facilities will be required to evidence of employment levels in order to calculate affordable housing needs. As explained in the Trust's response to para 61, services such as developments in hospital buildings are a response to population growth.  Hospital development should not be required to make provision for affordable housing.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3202 - Bidwells	Object	The requirement for new employment developments to contribute to the provision of affordable housing is not supported by any guidance within PPG4, PPS3 or Circulars 5/05 and 6/98. Should Structure Plan Policy 9/1 not be saved there will be no support for this policy approach at Regional level either. As such, we do not believe that this requirement can be justified under wider Government or Regional Policy and we therefore object to the provisions of paragraphs 59-65. These paragraphs should be deleted.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3200 - Bidwells	Object	The use of job density calculations for new developments based upon set employment densities for each Use Class are, in our experience, fairly arbitrary and are not an accurate means of calculating the likely employment generation of employment development. If the requirement for contributions from employment development is retained the methodology for calculations should be reviewed.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
<i>63.</i>				
3204 - Bidwells	Object	The requirement for new employment developments to contribute to the provision of affordable housing is not supported by any guidance within PPG4, PPS3 or Circulars 5/05 and 6/98. Should Structure Plan Policy 9/1 not be saved there will be no support for this policy approach at Regional level either. As such, we do not believe that this requirement can be justified under wider Government or Regional Policy and we therefore object to the provisions of paragraphs 59-65. These paragraphs should be deleted.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3180 - University of Cambridge	Object	The 40% affordable housing target contained in Policy 5/5 was informed by evidence relating to housing development viability. That should not be confused with employment development and viability – it is not a like-for-like comparison. If the policy is to be implemented, and the University maintains that it should not, the Council should at least undertake robust empirical research on the actual housing needs for different types of employment development to inform the preparation of this part of the SPD.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
64. 3201 - Bidwells	Object	The draft SPD proposes an arbitrary range in terms of the payments that will be sought per job. The SPD provides no information to demonstrate how these payment ranges have been calculated and how they can be justified as being proportionate in scale and kind to any impacts attributable to new employment developments in terms of affordable housing impact. If the requirement for financial contributions from employment development is retained the SPD should be amended to reflect these points with more information included to justify the level of contributions being sought and how these revenues will be used.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3208 - University of Cambridge	Object	There is no empirical evidence base to support contributions at between Â£500 - Â£1000 per job for different types of employment development. The implications for employment development viability must be explored first. The policy should not be implemented, and this part of the SPD not adopted, until that research has been undertaken.  The proposed methodology exposes the fact that the primary effect of the policy would be to tax employment development and not to make a significant impact on addressing housing need.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
3144 - Cambridge University Hospital NHS Foundation Trust	Object	The Trust receives its income from the PCT's for the number and type of patients treated. The amount of funding available to the PCT is based on a standard mortality and morbidity rate for a typical population - per head of the population. If the Trust were required to make affordable housing contributions as part of its development plans this would increase its overall costs and therefore prices. It follows that any price increase for hospital treatments /care will reduce the amount of healthcare that the PCT can purchase from its fixed budget. This would mean that healthcare funds are therefore being diverted to provide affordable housing. This is totally illogical and unreasonable.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
3206 - Bidwells	Object	The requirement for new employment developments to contribute to the provision of affordable housing is not supported by any guidance within PPG4, PPS3 or Circulars 5/05 and 6/98. Should Structure Plan Policy 9/1 not be saved there will be no support for this policy approach at Regional level either. As such, we do not believe that this requirement can be justified under wider Government or Regional Policy and we therefore object to the provisions of paragraphs 59-65. These paragraphs should be deleted.	Agree because the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
<i>65.</i>				
3108 - Cambridgeshire County Council	Object	It would be useful to cross refer to the other relevant parts of the SPD to make clear that the provision of on-site affordable housing on employment sites will have to meet the requirements set out in paras 27-58.	Noted. However the binding Inspectors Report on the Cambridge East Area Action Plan (which contains a similar policy to policy 5/6) finds that in the absence of support from a higher level policy there would be a need for specific local circumstances to justify the imposition of the requirement and that the available evidence base is insufficient to justify the policy. It is recommended for deletion from the Area Action Plan. Given this finding there can be no certainty that the Local Plan policy and this SPD would be supported by an Inspector in an appeal situation which would lead to uncertainty and delays to the planning process.	Delete references relevant to the implementation of policy 5/6 of the Local Plan.
<i>67.</i>				
3128 - Marshall Group of Companies	Object	The requirement that the provision of affordable housing should not lag behind market housing must be capable of review in circumstances where the provision of affordable housing on a particular site is held up either by the absence of, or delay in the availability of funding from the Housing Corporation, or other similar source. It would be misguided in the extreme if delay in the availability of funding for any agreed affordable housing element held up the provision of open market housing in Cambridge with its high demand for housing of all kinds.	Concerns noted but paragraph 67 is setting out a guiding principle rather than a rigid requirement. The details of the phasing of market and affordable housing will be detailed in the planning obligation accompanying each planning permission.	
3239 - Barton Willmore	Object	We would highlight that the phasing of affordable housing provision should be informed by the need or otherwise for enabling works, the logical build programme and scheme viability.	Disagree because viability is a matter that is considered elsewhere in the SPD and because these are matters that will affect all housing development on a site.	



<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
68. 3291 - St John's College 3253 - Anglian Water Services Limited	Object		<p>Disagree that a specific deadline should be included in the SPD. The City Council is obliged to operate this policy in a reasonable manner taking account of all material considerations including the implications for delays and costs.</p> <p>The Mortgagee in Possession clause currently used by the Council does include a timeframe within which the lender should actively seek to sell to an RSL. The following extract is from such a MIP clause:</p> <p>"...first notified the Council in writing that it wishes to exercise its statutory powers of sale, AND for at least 90 days following such written notification used best endeavours to enter into a contract for the sale of the whole or part or parts of such land proposed to be sold to a registered social landlord upon terms that the mortgagee or chargee or receiver will be paid at market value of such land on the basis of the restriction that the land may only be used or occupied in accordance....."</p> <p>As this 90 day timescale may be subject to future variation it is not thought appropriate to include it in the SPD.</p>	
3197 - Various Cambridge Colleges	Support	<p>Paragraph 68 refers to the provisions of legal agreements in securing affordable housing. The arrangements referred to require mortgagees to actively seek to dispose of properties to an additional RSL approved by the Council, where an RSL is involved. What is not clear, is the timescale over which the mortgagee should seek to dispose of properties. Without this clarity, the ability of RSL's to borrow could be prejudiced, leading to increased delays and cost in the planning and development process. We therefore suggest that this wording is checked with RSL funders.</p>	<p>Your support is noted. The Mortgagee in Possession clause currently used by the Council does include a timeframe within which the lender should actively seek to sell to an RSL. The following extract is from such a MIP clause:</p> <p>"...first notified the Council in writing that it wishes to exercise its statutory powers of sale, AND for at least 90 days following such written notification used best endeavours to enter into a contract for the sale of the whole or part or parts of such land proposed to be sold to a registered social landlord upon terms that the mortgagee or chargee or receiver will be paid at market value of such land on the basis of the restriction that the land may only be used or occupied in accordance....."</p> <p>As this 90 day timescale may be subject to future variation it is not thought appropriate to include it in the SPD.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<i>69.</i>				
3276 - Home Builders Federation	Object	It is not clear why the Heads of Terms needs to be agreed before planning application/s are determined	Disagree because the broad terms of the legal agreement need to be agreed at the same time as a planning application is being considered by planning Committee, hence they must be available before determination.	
3240 - Barton Willmore	Object	Monitoring costs should not be incurred by the applicant as this is already charged in the application fee.  There is nothing in the circular 05/05 charging for monitoring planning obligations and as such it is not appropriate for double charging by the Council.	Disagree because the planning fee does not pay for the extra work involved in monitoring legal agreements. The City Council consider that its approach is consistent with Circular 05/05 and with the DCLG publication " Planning Obligations - Practice Guidance 2006".	
3277 - Home Builders Federation	Object	Why the developer has to fund the cost of agreement, transfer of land and cost of monitoring compliance, as this will be part of the application fee.	Disagree, the planning application fee does not pay for all the extra work involved in the planning obligation process (see page 53 of the draft City Planning Obligation SPD) hence it is reasonable that the developer meet these costs as the principal beneficiary. This approach is common practice and is consistent with the DCLG publication ' Planning Obligations - Good Practice' from 2006.	

## *Annex 1: Cambridge Local Plan 2006*

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3098 - Cambridgeshire Constabulary 3198 - Various Cambridge Colleges	Object	Re e- The policy of active frontages is supported but dwellings should benefit from areas of clearly identifiable defensible space to provide a buffer between windows and public space for privacy and to avoid dispute between residents and users of public space.  Paragraph 5.9 refers specifically to the income thresholds for intermediate housing provided for specific groups of key workers. The actual groups provided for from site to site would need to be consistent as the income profiles of these groups vary significantly. An inconsistent approach would therefore have varying impacts on values from site to site ? this would lead to uncertainty and would not represent the fairest approach to key worker housing provision.	Comments noted, but these are in relation to extracts from the adopted Local Plan 2006 which cannot now be changed.	
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<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Council's Assessment</i>	<i>Change to Draft DPD</i>
<b><i>Annex 3: Financial Contributions in Lieu of On-site Provision of Affordable Housing (Commuted sum payments)</i></b>				
<b><i>3.1</i></b>				
3286 - Ashwell Developments Ltd	Object	It is appropriate that there is recognition of the possibility of a commuted payment in lieu of on site provision. However, the commuted sum contribution should be linked to overall viability on any particular scheme. This should be recognised in Annex 3 to the draft SPD.	Disagree because the issue of overall scheme viability is already included in the guidance in Annex 3 at paragraph 3.3 .	
<b><i>3.3</i></b>				
3293 - St John's College 3255 - Anglian Water Services Limited	Object	The financial contribution methodology is acceptable however the notion to make public the results will be prejudicial as this could have an impact on whether or not the development will be carried forward.	Concern noted however only the conclusions of the financial appraisal will need to be made public and so should not have implications for whether a development is carried forward or not.	
3212 - Bidwells 3211 - Various Cambridge Colleges	Object	We accept the principle of calculation based upon differential land values achievable between developments with/without affordable housing. SPD proposes a notional scheme should be agreed against which the value of the scheme without affordable housing can be assumed based on the opinion of an appointed valuer. We are concerned that openbook valuations will mean that commercially sensitive information will be publicly available and this could prejudice the delivery of development. The difficulty is that an adversarial value is assumed for a notional scheme? a system which is too open-ended. We suggest a more transparent system would be a tariff basis.	Concerns noted as is the acceptance in principle of the proposed methodology. Disagree that this is likely to affect the delivery of development as only the conclusions of the financial appraisal will be made public. The proposed tariff based alternative system is not set out in any detail such that it could be substituted for the proposed methodology in Annex 3 or for any analysis to be made of its merits.	
<b><i>3.5</i></b>				
3294 - St John's College 3256 - Anglian Water Services Limited	Object	The payment calculation seems to be too open ended and a more objective approach is required such as a tariff basis, but realise that the benefits that the proposed system has.	Disagree because the proposed system will only be open-ended if either party refuses to agree on the outcome of the valuations. The developer will always retain the opportunity to appeal on grounds of non-determination or refusal of permission. The tariff based alternative is not set out in any detail so that an analysis of its merits can be made.	
<b><i>Annex 7: Glossary</i></b>				
<b><i>Annex 7: Glossary</i></b>				
3145 - Cambridge University Hospital NHS Foundation Trust	Support	A definition of Key workers is needed in the Glossary. The brief description set out in paragraph 44 is considered appropriate.	Your support is noted.	