



The Planning Inspectorate

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# **Report to Cambridge City Council**

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**Inspectors appointed by the Secretary of State**

**Date: 29 August 2018**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Cambridge Local Plan 2014**

The Plan was submitted for examination on 28 March 2014

The examination hearings were held between 04 November 2014 and 30 April 2015;  
and between 07 June 2016 and 18 July 2017

File Ref: PINS/Q0505/429/6

## Abbreviations used in this report

AA	Appropriate Assessment
AoMC	Area of Major Change
CIGBBS	Cambridge Inner Green Belt Boundary Study
DtC	Duty to Co-operate
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
JSPU	Joint Strategic Planning Unit
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NDSS	Nationally Described Space Standard
NPPF	National Planning Policy Framework
OAHN	Objectively assessed need for housing
PAS	Planning Advisory Service
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SDSR	Sustainable Development Strategy Review
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SoCG	Statement of Common Ground
University of Cambridge	UoC
WMS	Written Ministerial Statement

## Non-Technical Summary

This report concludes that the Cambridge Local Plan 2014 provides an appropriate basis for the planning of the City of Cambridge, provided that a number of main modifications [MMs] are made to it. Cambridge City Council has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

All the MMs were proposed by the Council, and were subject to public consultation over periods of seven weeks in December 2015-January 2016 and six weeks in January – February 2018. In some cases, we have amended their detailed wording. We have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows (this is not an exhaustive list):

- A modification to recognise the Council's intention to carry out an early review of this Plan through the preparation of a joint Local Plan with South Cambridgeshire District Council;
- Modifications to provide clarity over the calculation of a five year housing land supply;
- Amendments to some of the Areas of Major Change, including the provision of additional residential development on parts of the Cambridge East AoMC;
- Amendments to the Coldham's Lane AoMC to provide clarity on what different parcels of land will be used for;
- Clarification of various elements within the Mill Road Opportunity Area;
- Amendments to introduce the Cambridge Natural Environment Strategy;
- An extension to allocation GB2;
- Modifications to ensure the policies are consistent with national policy in relation to heritage assets and the natural environment;
- Amendments to policies relating to energy efficiency standards, technical housing standards and wind energy to reflect national planning policy;
- Amendments to include the Nationally Described Space Standards rather than locally set standards;
- Clarification that relevant policies will apply to 'visitor accommodation' not solely hotels.
- Amendments to ensure that the approach to the provision of affordable housing is consistent with national policy;
- A revised framework for monitoring;
- Amendments to policies relating to provision for gypsies and travellers.

## Introduction

1. This report contains our assessment of the Cambridge Local Plan 2014 (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Cambridge Local Plan, submitted in March 2014, is the basis for our examination. It is the same document as was published for consultation in July 2013. The Plan was submitted for examination alongside the South Cambridgeshire Local Plan. The two plans share a joint core document library and a common spatial development strategy, as explained below.

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. Our report explains why the recommended MMs, most of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **C01, C02, C03** etc, and are set out in full in the Appendix.
4. The Council carried out consultation on a first set of MMs between 02 December 2015 and 25 January 2016 and carried out sustainability appraisal (SA) on them. Following the close of the examination hearings, the Council prepared a further schedule of proposed MMs and carried out SA of them. The second schedule and the SA were subject to public consultation between 5 January 2018 and 16 February 2018. We have taken account of the consultation responses in coming to our conclusions in this report and in this light, we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary, we have highlighted these amendments in the report.
5. The Council has proposed a number of modifications which are intended to update the text of the Plan, which is understandable given the length of the examination, or in some cases to make improvements to the Plan. However, where these are not necessary to make the Plan sound, we have removed them from the Appendix. Within the limits prescribed by the Regulations, the Council can make additional minor modifications to the Plan at adoption.

## **Policies Map**

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map is set out in RD/Sub/C/020.
7. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. These further changes to the policies map were published for consultation alongside the MMs (RD/MM/010), and are now contained in document RD/EX/140.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in RD/Sub/C/020 as amended by (RD/EX/140).

## **Assessment of Duty to Co-operate**

9. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
10. There has been a long history of joint working between the City Council, South Cambridgeshire District Council and the other Cambridgeshire Districts. Together with Peterborough City Council, the Cambridgeshire Districts set up a Joint Strategic Planning Unit (JSPU) in 2012. The JSPU facilitated meetings of senior Members from each of the Districts and has produced the Joint Statement on Strategic Planning in Cambridgeshire (RD/Strat/030) and the Cambridgeshire and Peterborough Memorandum of Cooperation: Supporting the Spatial Approach 2011 - 2031 (RD/Strat/100). The Memorandum supports the development of a coherent and comprehensive growth strategy across Cambridgeshire and Peterborough.
11. A wide range of potential strategic matters were considered by the JSPU and through engagement with other bodies including the Environment Agency, Highways England, Natural England and English Heritage. Strategic issues considered include: housing need and distribution; employment land; flood risk; and the provision of infrastructure, including transport.
12. Section 28 of the Act gives the power to local planning authorities to prepare a joint plan. Section 33A(6)(b) requires local planning authorities to consider whether to agree under section 28 to prepare joint local development documents. Section 33A(7) requires anyone who is subject to the duty to cooperate to have regard to any guidance given by the Secretary of State about how the duty is to be complied with.

13. Guidance has been provided by the Secretary of State at paragraph 16 of PPG which states: *Where two or more local planning authorities decide to work together to prepare Local Plans or policies they should consider how to achieve this most effectively. For some authorities the most appropriate way might be to form a joint committee ..... Alternatively, the local planning authorities could prepare a joint plan, using powers **section 28 of the 2004 Act**, or align their Local Plans, so that they are examined and adopted at broadly the same time.*
14. The Guidance, therefore, suggests that the preparation of a joint plan is one way of complying with the duty to cooperate, but there is no indication that local planning authorities must make a formal resolution on whether to prepare a joint plan. South Cambridgeshire District Council and Cambridge City Council advised that the preparation of a joint local plan had been considered at officer level, but was not subject to a formal resolution by Members.
15. The Councils have chosen the last of the options referred to in PPG: that is to align, closely, their two plans. A Joint Strategic Transport and Spatial Planning Group, comprising Members from Cambridge City, South Cambridgeshire District and Cambridgeshire County Councils was set up in March 2012. One of the tasks for the Group has been to ensure policy alignment that will allow the timely development of both authorities' new Local Plans. The plans have been prepared with a joint core documents library and share a joint evidence base for many issues and were submitted for examination at the same time.
16. Overall, we are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

## **Assessment of Soundness**

### **Main Issues**

17. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings we have identified 16 main issues upon which the soundness of the Plan depends. Under these headings our report deals with the main matters of soundness and/or legal compliance rather than responding to every point raised by representors.

### **Issue 1 – Is the spatial strategy sound?**

18. The starting point for the development strategy, which is common to this Plan and the South Cambridgeshire Local Plan, is the non-statutory Cambridge and South Cambridgeshire Sustainable Development Strategy Review (SDSR) (RD/Strat/040), prepared by the JSPU. The SDSR establishes a sustainable development sequence for the Cambridge sub-region as follows: within the urban area of Cambridge; on the edge of Cambridge; one or more new settlements; within or adjoining market towns; and at sustainable villages. The market towns, as defined for the purposes of the SDSR, are outside the administrative areas of Cambridge City and South Cambridgeshire and therefore this level is not relevant to the hierarchy as applied to the City and South Cambridgeshire.

19. The Local Plan seeks to maximise opportunities for the provision of new housing and employment development, within the urban area, which is entirely consistent with the SDSR. The SDSR recognises the significant advantages in sustainability terms of locating development on the urban edge but conflict with Green Belt purposes is also recognised.
20. The SA Addendum Report November 2015 (RD/MC/020) and Supplement (RD/MC/021) also recognise the sustainability benefits of sites located on the edge of Cambridge particularly in relation to the use of sustainable transport modes. However, land on the edge of Cambridge is in the Green Belt and with the exception of a limited number of small sites referred to later in this report the Council is not proposing to release any significant areas of land from the Green Belt in this Plan, although a significant amount of new development is expected to occur in this plan period as a result of allocations on land removed from the Green Belt in previous rounds of plan making. The NPPF affords a very high degree of protection to the Green Belt and we consider later in this report whether there are exceptional circumstances to justify the alterations to the boundary of the Green Belt proposed in this Plan.
21. Elsewhere in this report we recommend MMs to policies dealing with sites on the edge of the urban area. **CO02** is necessary to ensure the Key Diagram is consistent with the modified text of the Plan and to ensure the Plan is effective.

### *Conclusion*

22. We therefore conclude that the spatial strategy is sound.

### **Issue 2 – Whether the plan identifies a sound assessment of the overall level of housing need and the need for affordable housing, and sets an appropriate housing requirement.**

#### *Housing Market Area (HMA)*

23. The Strategic Housing Market Assessment (RD/Strat/090) is based on the Cambridge HMA which comprises the City Council, South Cambridgeshire District Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, Forest Heath District Council and St Edmundsbury District Council.
24. The evidence provided by the Council (PM1/CCC&SCDC – Supplement 1) based on data from the 2011 Census demonstrates that the Cambridge HMA has a higher level of commuting self-containment than other options tested, and also a higher level of migration self-containment. It is probably inevitable that any defined HMA will have links with areas beyond its boundary but it is not practical, in this case, to attempt to subdivide local authority areas when defining the HMA.
25. The Cambridge HMA is the basis for the Memorandum of Co-operation (MoC) (RD/Strat/100) between the 7 Authorities in the Area together with Peterborough City Council. The MoC distributes the objectively assessed housing need derived from the sub-regional SHMA. This has been a long-standing arrangement and we find this definition of the HMA is reasonable.

*Objectively assessed need for market and affordable housing (OAHN)*

26. The OAHN of 14,000 new homes for Cambridge City, included in the submission draft plan, is derived from the Cambridge Sub Region Strategic Housing Market Assessment (SHMA) (RD/Strat/090). In our interim findings (RD/GEN/170) we expressed our concerns that the methodology of the 2013 SHMA is not entirely consistent with Planning Policy Guidance (PPG) which was published in 2014.
27. PPG advises that household projections published by the Department for Communities and Local Government (now MHCLG) should provide the starting point estimate of overall housing need, whereas the SHMA relies on population figures from the 2011 Census, rather than household projections. We also expressed concern that the SHMA did not fully take into account the PPG advice relating to market signals, particularly in relation to affordability, which is widely recognised as a chronic problem for the City.
28. The Council commissioned further work to address these issues. The resulting report by Peter Brett Associates (the PBA report) (RD/MC/040) finds that the DCLG 2012 household projections identify a housing need in the City of just under 7,000 dwellings for the period 2011-2031. The report compares the CLG household projections against alternative demographic scenarios from the Greater Essex Demographic Forecasts produced by the demographers Edge Analytics for the Essex Planning Officer's Society. The Edge Analytics study included Cambridge City (and South Cambridgeshire) to provide a broader picture for the Essex authorities. There is a general consensus that household projections for the City are implausibly low, due largely to unattributable population change and the report concludes that the Edge Analytics figure based on their 10-year (2003-2013) trend population projection with the household headship rates taken from the 2012 CLG household projections is a more appropriate 'starting point' for determining OAHN. This is a figure of 10,069 new dwellings in the City over the period 2011-31. The report then considers market signals and concludes that an uplift to the starting point is warranted to take account of market signals relating to affordability.
29. PPG advises that any such upward adjustment should be set at a level that is reasonable. The report recommends an uplift of 30% which is one of the highest percentages applied to date, the other example of this rate being Canterbury. We note, from the PBA report, that the rate of change in house prices and the affordability ratio are both similar in Cambridge and Canterbury. The fact that absolute house prices are higher in Cambridge than Canterbury is a less useful indicator because it may be as much a reflection of wage levels as of restricted availability of land for housing. We agree that 30% is a substantial but reasonable uplift. Applying a 30% uplift (10,069 x 130%) results in a figure of 13,090.
30. It is noted in the PBA report that this figure is less than the SHMA figure which takes account of job growth. This indicates that the figure should be further adjusted upwards to the SHMA figure of 14,000 to support future job growth.
31. The PBA report was criticised for a number of reasons including the fact that it only deals with Cambridge City and South Cambridgeshire whereas the NPPF requires an assessment for the Housing Market Area. We consider that there



is some force to this argument, as changes to OAHN throughout the HMA may have an impact on the spatial distribution of new housing set out in the Memorandum of Cooperation. The MoC dates from 2013 and covers the period 2011-2031. Arguably, it will need to be updated as the authorities involved prepare plans which extend significantly beyond 2031. An update will enable the most up-to-date housing need figures to be taken into account across the HMA. However, with the various authorities in the HMA at different stages in preparing or reviewing their local plans it could lead to an excessive delay in completing this examination if an update for the whole HMA were to be required now. In the circumstances it is reasonable and pragmatic to plan on the basis of these two local authority areas.

32. PPG advocates the use of the most up-to-date evidence of future household growth, although it suggests that that the national household projection may require adjustment to reflect local demographic factors such as suppressed household formation rates. The Council's evidence (RD/MC/041), which is based on the 2011 Census, demonstrates that, for the critical age range 25-39 when household formation is most likely to be suppressed by housing difficulties, the rates for Cambridge are very similar to those for England as a whole. We are not, therefore, persuaded that there is any justification for departing from the rates used in the 2012 national household projections.
33. In July 2016 the Government's 2014-based household projections were issued. The PPG states that, wherever possible, assessments of OAHN should be informed by the latest evidence, but that a change does not automatically mean that housing assessments are rendered outdated every time new projections are issued. To avoid further substantial delay in the adoption of the Plan, we have taken the view that the most pragmatic approach is for the latest Government household projections to be considered through the planned early review of the Plan, in the context of the approach to local housing need assessment in the revised NPPF, which is subject to consultation at the time of writing this report.
34. For the reasons given above, we accept that the assessment of OAHN has some flaws and we are also aware that alternative methodologies used by some representors indicate that the OAHN for the City should be significantly higher than the SHMA figure. It is also arguable that the figures should be lower if the most up to date economic projections from the East of England Forecasting Model are used, together with different occupancy rates and a different approach to the rounding of overall figures. However, PPG notes that no single approach will provide a definitive answer. Bearing in mind that the figure of 14,000 is double the figure derived from using the DCLG household projections alone, we are satisfied that it is acceptable.
35. The Council has proposed a modification (**C003**) to include text to refer to the additional technical evidence that has been prepared relating to the OAHN. This is necessary to ensure that the Plan reflects the up-to-date evidence base and is justified.

#### *Affordable Housing*

36. The SHMA assessed the need for affordable housing according to the then current 2007 Planning Practice Guidance, which has since been replaced by

similar guidance at paragraphs 022 – 029 of PPG. These calculations were revised later in the light of new data for 2013/14. The resulting net affordable need for Cambridge City is 10,402 homes over the plan period.

37. The PBA report estimates that, if the OAHN is met over the Plan period, the City would receive enough developer contributions to meet about half of its affordable housing need. The housing need figure has been substantially uplifted above the demographic starting point to help improve affordability. In this context, a further uplift to the housing requirement is unlikely to be effective given it is unclear where the demand for additional market houses would come from and it could undermine delivery in other parts of the HMA which tend to have better housing affordability.

#### *Conclusions on OAHN*

38. In all the circumstances we consider that the OAHN assessment of 14,000 new dwellings for Cambridge City is based on a reasoned judgement of the available evidence and is acceptable.

### **Issue 3 – Whether there is a reasonable prospect of a five-year supply of deliverable sites on adoption, and whether the policies and allocations in the Plan will ensure that the housing requirement is met**

#### *Five year housing land supply*

39. The plan aims to facilitate the delivery of 14,000 homes over the Plan period to meet, in full, the OAHN.

#### *Buffer*

40. In their statement for Matter 8, the Councils provided information on housing completions compared with the targets set out in the adopted development plans from the years 1999/2000 to 2013/2014. Since the adoption of the Cambridge Local Plan in 2006, the annualised housing target has been met only once. In the years preceding the adoption of the Local Plan 2006, the targets in the adopted structure plans were met only once, although in the year 2005/2006, completions were very close to the target.
41. The reasons for the failure to deliver housing at the required rates will include factors beyond the Council's control, including poor market conditions in the years following the recession in 2007/2008. Nonetheless, the failure to meet targets in so many years across the 15 year period represents persistent underdelivery, and we conclude that the appropriate buffer at this point should be 20%.

#### *Use of joint trajectory.*

42. The foundation for the Cambridge Local Plan and the South Cambridgeshire Local Plan is the Sustainable Development Strategy Review, as discussed under issue 1 above. Although a joint plan has not been prepared, the two plans are both based on the SDSR, as explained above. In the early years of the Plan period, the majority of development in sites on the edge of Cambridge is likely to take place within the administrative area of the City

whereas in the later years of the plan period most development will take place within South Cambridgeshire, including at the new settlements. During the Examination the City Council, together with South Cambridgeshire District Council, prepared a Memorandum of Understanding (RD/Strat/350) which advocates the use of a joint housing trajectory for the two authorities. Overall, the use of the joint trajectory will lead to a more sustainable pattern of development in accordance with the SDSR.

43. Planning Practice Guidance Ref 010 2a-010-20140306 advises: *Where there is a joint plan, housing requirements and the need to identify a five year supply of sites can apply across the joint plan area. The approach being taken should be set out clearly in the plan.* The use of the joint trajectory across the two plans will be a temporary measure until a joint local plan is prepared (see issue 16), which will bring the situation fully into line with PPG. In all the circumstances, this is a reasonable approach.
44. Cambridge City does not have a shortfall in the delivery of new housing in the years 2011-2017. However, for the purposes of the joint trajectory, it is appropriate to deal with the shortfall over the remainder of the plan period, known as the Liverpool method. This is because of the reliance, in the South Cambridgeshire Local Plan, on the delivery of two new settlements which require significant investment in new infrastructure and, realistically, may not start to deliver new housing until the mid or later years of the plan period.
45. **C004, C011, C012, and C014 – C020 and C271** are necessary to establish the approach to calculating the five year housing land supply which will be used and to confirm the housing land supply position in November 2017. This will ensure that this part of the Plan is effective and consistent with national policy. **C271** also includes Figure N6 which details components of supply and the expected rates of delivery. We consider the main components of supply in more detail elsewhere in this report but, in summary, we consider the Council's assessment of supply is reasonable and evidence-based. The Plan makes provision for about 14,500 new dwellings, which allows a degree of flexibility against the OAHN of 14,000 new dwellings. Over 7,000 new dwellings within the urban area and the urban fringe had planning permission in April 2015 which provides confidence that the housing requirement will be met.

### *Conclusions*

46. Subject to the inclusion of the MMs identified, we conclude that there is a reasonable prospect that the Plan will provide for a 5 year housing land supply on adoption and that the housing requirement will be met.

### **Issue 4 – Does the Plan comply with national policy in its approach to the Green Belt? Are the allocations of Green Belt land justified by exceptional circumstances? Should other Green Belt allocations be made?**

#### *Purposes of the Green Belt*

47. Paragraph 80 of the Framework sets out 5 purposes of the Green Belt. These are set out in the Plan at paragraph 2.50, together with three Cambridge Green Belt purposes: to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre; to maintain and enhance

the quality of its setting; and to prevent communities in the environs of Cambridge from merging into one another and with the city. It is not the role of the Local Plan simply to reiterate national policy. It can, however, interpret national policy in a local context. The Cambridge Green Belt purposes reflect the importance of Cambridge as a historic city and the particular role of the Green Belt in preserving its setting. The Cambridge purposes have been included in previous development plans including the Cambridgeshire and Peterborough Structure Plan 2003 and the Cambridge Local Plan 2006. In any event, the national Green Belt purposes can be taken into account, where relevant in the context of any specific proposal. In our view the Cambridge Green Belt purposes are not inconsistent with national policy and the Plan is sound in this respect.

### *Development Management in the Green Belt*

48. Policy 4 of the LP indicates that new development in the Green Belt will not be approved except in very special circumstances. This wording is not consistent with the NPPF because it fails to recognise those categories of development that are recognised as being not inappropriate in the Green Belt in paragraph 89 of the Framework. Such development is not required to be justified by very special circumstances. **C021** is therefore necessary to ensure consistency with national policy.

### *Green Belt Review*

49. Significant tracts of land were taken out of the Cambridge Green Belt in the Local Plan 2006 at sites on the edge of the City and extending into the South Cambridgeshire District Council administrative area. These sites are now being developed and will contribute to the delivery of new housing in the early years of this plan period.
50. Having regard to the overall spatial strategy and the finding of the SDSR that the edge of Cambridge is the second most sustainable location for growth in the Greater Cambridge area, the Council, together with South Cambridgeshire District Council undertook a further review of Green Belt boundaries in 2012 with a view to establishing whether any land could be released from the Green Belt without significant harm to the purposes of the Green Belt.
51. The review identified a limited number of sites that could be released from the Green Belt, which we comment on below. The review assessed parcels of land in the Green Belt and scores their importance on a scale of 'low', 'medium' and 'high' with respect to the Green Belt purposes of setting, character and separation. An overall score of importance to Green Belt is then given for each parcel of land. As we set out in our initial findings of May 2015 (RD/GEN/170) we found it difficult, in some cases, to understand how the overall score for importance to Green Belt had been derived from the individual scorings for setting, character and separation. In response to our concerns, the Councils commissioned an independent assessment of the Inner Green Belt boundary. The Cambridge Inner Green Belt Boundary Study (CIGBBS) (RD/MC/030) found that the great majority of the land within the Cambridge Green Belt was assessed as being important to Green Belt purposes.

52. A number of criticisms were made of both the Councils' 2012 review and the CIGBBS, including the way in which the parcels of land were identified, and whether the identification of the qualities/assessment criteria against which the different areas were assessed.
53. Both the Councils' Review and the CIGBBS identify sectors and subsectors as the basis for the assessment. The sectors were broadly defined using the main radial routes and other features such as the river. The sectors were then divided into subsectors where there were clear changes in the characteristics of the land. It was argued by some that a much finer grain should have been used. However, the nature of the purposes of the Green Belt, including preventing urban sprawl and the merging of settlements require assessment at a broad scale. We consider that the methodology employed is based on a reasoned judgement having regard to physical features and landscape characteristics and is a reasonable approach to take.
54. There is no widely accepted methodology to guide the way in which assessments of the Green Belt should be carried out, although the Planning Advisory Service (PAS) document *Planning on the Doorstep: The Big Issues – Green Belt* (RD/Strat/460) advises that 'Any review of Green Belt should involve an assessment of how the land still contributes to the five purposes', although the document accepts that Green Belt purpose 5 'to assist in urban regeneration....' is likely to apply equally to all land within the Green Belt, and the value of different land parcels is unlikely to be distinguished by application of this purpose. The 16 qualities/assessment criteria used in the LDA study draw on the other 4 national purposes and the Cambridge Green Belt purposes in identifying factors which are particularly important for the City and its surrounding landscape. We conclude that the CIGBBS is a robust approach which follows the PAS advice.

#### *Green Belt allocations - residential*

55. The Plan allocates two sites in the Green Belt for housing development, referred to as GB1 and GB2, situated north and south of Worts Causeway, and adjoining the edge of the urban area. The CIGBBS finds that limited development on the relatively flat ground in this location could be undertaken without significant long-term harm to Green Belt purposes, and we agree with that assessment.
56. The development of these sites would contribute about 400 new dwellings. In the context of the housing requirement for 14,000 dwellings, this is a relatively small contribution but in a highly sustainable location (the second tier in the sustainable development strategy). The development of these sites also gives rise to an opportunity for planting along the eastern boundary to form a stronger, landscaped edge to the City in this location.
57. If these sites were not to be removed from the Green Belt and allocated for housing, the City would not be able to meet its housing requirement within its own boundaries which would probably result in development in less sustainable rural locations. We conclude that the benefits of the development of these two small sites for housing outweigh the very limited impact on the purposes of the Green Belt and thereby constitute the exceptional

circumstances necessary to justify the alteration to the boundaries of the Green Belt.

58. The Council has proposed to increase the size of site GB2 to include Newbury Farm (**C213** and **C092**). This would be a small extension of 0.9 ha on a site which already has some built structures and makes a limited contribution to the purposes of the Green Belt. The inclusion of the Newbury Farm site would assist in the creation of a landscaped boundary to the Green Belt in this location and is necessary to ensure that the Plan is effective.
59. Some representations raised concerns, other than loss of Green Belt, to the development of these sites including drainage, impact on biodiversity and transport infrastructure. The Council's evidence (Appendix 11 of M6/CCC and SCDC) indicates that these issues can be resolved through the development management process and we agree that there is a reasonable prospect that these could be overcome.
60. **C212 and C214** which amend the indicative density to a gross figure are necessary to ensure consistency with the way in which other residential allocations are treated in the plan. **C212** also amends the area of site GB1 to exclude the County Wildlife site and is necessary to more accurately reflect the developable area of land. **C215** which requires contributions to be made towards improved community facilities and services is necessary to ensure consistency with Policy 26 of the Plan.

*Green Belt allocations – employment development*

61. The Plan allocates sites at Fulbourn Road for employment purposes, referred to as GB3 and GB4. These sites adjoin the existing Peterhouse Technology Park. The allocation would extend the urban area of Cambridge so that the new southern boundary would align with the boundary of the Technology Park. Policy 26 requires the establishment of a landscaped edge to the new boundary of the Green Belt. We agree with the Council's assessment that the development of these sites would have a limited impact on the purposes of the Green Belt.
62. The main occupier of the Peterhouse Technology Park is ARM, an internationally recognised technology company. The company has plans to expand and there are clear advantages to being able to do so at their existing site. In view of the importance of research and development to the Cambridge economy and, in turn, to the national economy, we consider that the benefits of allocating these sites for employment development outweighs the limited impact on the purposes of the Green Belt thereby constituting the exceptional circumstances necessary to justify the alteration to the boundary of the Green Belt.
63. Some representors raised concerns about the development of these sites, unrelated to the Green Belt issue. These include impact on adjoining residential development, biodiversity and transport infrastructure. We agree with the Council that these matters are capable of resolution through the development management process.

*Should other Green Belt allocations be made?*

64. A number of sites have been promoted for development on the edge of Cambridge in the Green Belt. These sites straddle the boundary of the City and South Cambridgeshire District and were referred to as: Land to north of Barton Road, proposed as a sustainable urban extension for 1,450 new homes and associated facilities and services; Land at Grange Farm, proposed for 400-500 new homes and open space/sports use; Cambridge South, promoted for employment-led mixed use development; and Cambridge South East (initially proposed as a site for the development of 3,500 to 4,000 dwellings with associated services and facilities, but also as a smaller site for up to 1,200 dwellings and a primary school); Land at Fen Ditton, proposed for residential-led mixed use development to provide 400-500 new homes; Land West of Hauxton Road, Trumpington, which is promoted as a site for housing and sports uses or simply housing. In the light of our findings relating to the spatial strategy and the assessment of housing, employment and other needs, and the supply of land to meet those needs, we conclude that the Plan is sound without the allocation of additional sites in the Green Belt.

**Issue 5 – Whether the Plan will support and maintain a balanced supply of housing**

*Affordable Housing, Dwelling Mix and Employment-Related Housing*

65. Policy 45 seeks to ensure the effective provision of affordable housing and a mix of dwelling types, sizes and tenures. As submitted, the Policy requires 10% affordable homes on sites for the initial 2 to 9 dwellings. This is not consistent with the Written Ministerial Statement of 28 November 2014: Small-Scale Developers or with PPG (ID: 23b-031-20161116). The Council has produced evidence to demonstrate that sites of this size could make a contribution to the provision of affordable housing and remain viable. However, the WMS states that it is seeking to tackle the disproportionate burden on small-scale developers by lowering construction costs, thereby increasing the supply of housing. Viability is not, therefore, the sole consideration.
66. The number of additional affordable homes from developments of nine dwellings or less would only form a relatively small part of the overall affordable housing delivery. In the circumstances, **C134** is necessary to ensure consistency with national policy. We have made a minor addition to the wording of the MM to clarify that the affordable housing provision should be calculated on the basis of the net increase in the number of units on the site.
67. **C135**, **C136** and **C137** are necessary to clarify that affordable housing will not be sought in connection with the provision of student accommodation on the grounds of viability, and to ensure that the supporting text to Policy 45 is consistent with the modified Policy.
68. **C138** amends the wording of paragraph 6.6 of the supporting text so as to align it with the revised policy which affirms that if a vacant building credit is allowed, this would reduce the expected affordable housing contribution for that particular site.

69. Policy 46 aims to ensure that new student accommodation meets the identified needs of an existing educational institution in providing housing for students attending full-time courses of one academic year or more. **C139** adds a requirement that schemes should demonstrate that they have entered into a formal agreement with one of the two universities or other existing educational establishments providing full time of courses of at least one academic year. The revised wording also recognises that the University of Cambridge is a separate entity to the Cambridge colleges and the more generic term "educational establishment" has been substituted to resolve that issue. The modification to criterion e of the policy accords with national policy in terms of supporting sustainable modes of transport whilst providing a measure of flexibility which was absent in the previous wording. The rewording of criterion g of the policy provides greater clarity with regard to minimising the potential for anti-social behaviour. **C140** is necessary to ensure that the policy as a whole is worded consistently so a decision maker will have a clear indication of how to react to a development proposal.
70. **C141** inserts a new paragraph into the supporting text. The paragraph refers to the findings of the *Assessment of Student Housing Demand and Supply for Cambridge Council* prepared by Cambridge Centre for Housing and Planning Research, January 2017. The Assessment confirms that the current student accommodation units currently under construction or with planning permission combined with existing allocations and new allocations in the Plan would go beyond the assessed need, thereby providing flexibility. The Assessment justifies **C013** which seeks to prevent the development of student accommodation on sites allocated for housing, or with an extant planning permission, or identified as potentially suitable for housing in the SHLAA. This MM is necessary to ensure that the need for general housing is met.
71. The Assessment is based on information provided that the Anglia Ruskin University (ARU) had no aspirations for student growth to 2026. If that position were to change, the policy provides a framework against which any proposals for additional accommodation could be considered.
72. The policy text states that proposals for new student accommodation will be permitted if they meet the identified needs of an existing educational institution within the city of Cambridge in providing housing for students of one academic year or more. The final paragraph of **C141** is consistent with the policy text in that it seeks to ensure that the known needs of a specific institution are being met and that a formal linkage is demonstrated at the planning application stage.

### *Specialist Housing*

73. Policy 47 aims to ensure that the development of specialist housing meets the identified needs and that the loss of specialist housing is mitigated. Planning permission will be forthcoming subject to a number of policy criteria. These include evidence of demonstrable need, suitability for the intended occupiers, accessibility to local shops, services, community facilities, good access to public transport, and in a location that does not have an excessive concentration of such housing.
74. The Council has identified an omission in the policy in that it does not specifically require the retention of existing specialist housing per se.



Accordingly, the policy does not provide a restriction in this regard by way of a clear indication of the circumstances which would allow for the release of specialist housing. Paragraph 50 of the Framework states that Councils should plan for a mix of housing based on current and future demographic trends. The uncontrolled loss of specialist housing would bring the Plan into conflict with that requirement. However, the proposed changes to the policy text and supporting text will overcome this omission. **C142 and C145**

75. Concerns have been expressed that certain types of facilities would not be embraced by the policy although they do represent specialist housing. A change to paragraph 6.19 of the supporting text alleviates that concern by adding further types of specialist housing. A sentence in paragraph 6.15 of the supporting text has been deleted as it duplicates the information in paragraph 6.16 of the supporting text. **C143 and C144**
76. **C259** adds text to Appendix K 'Marketing, Local Needs Assessment and Viability Appraisal' to ensure that there is no unjustified loss of specialist housing.

*Technical Housing Standards – nationally described space standard (NDSS)*

77. Policy 50 sets internal residential space standards. The Written Ministerial Statement (25 March 2015) introduced a new national space standard for dwellings. Planning Policy Guidance (PPG) ID: 56-018-20150327 indicates that local planning authorities which are seeking to require an internal space standard should include a policy in their Local Plan referring to the standard. In order to justify the requirement, evidence has to be provided in respect of the need, viability and timing.
78. In respect of need for the standards, the Council undertook research on the unit sizes of a number of approved developments within Cambridge, in order to ascertain how the NDSS related to housing developments being delivered in Cambridge. Whilst the majority of assessed schemes coming forward in the city were considered to meet or exceed the NDSS, there was a number falling short of the standard. This work has been updated to reflect the requirements of the NDSS.
79. The assessment revealed that a number of planning applications related to proposed development fell short of the NDSS across one, two, three and four bedroom units and this included both gross floor areas and storage provision. In some cases, the proposed dwellings were significantly below the requirements of the NDSS. The Council has therefore identified a pattern of applications which departs from the standard.
80. The Council has assessed a sample of planning applications approved since 2008. The planning applications selected for further assessment were chosen on the basis of the number of bedrooms in order to allow assessment of a range of different unit types and bedrooms against the NDSS on the basis of availability of full plans. The majority of applications assessed were submitted to the Council between 2009 and 2013. In some instances where the number of bedrooms was either 4 or 5, there were fewer applications available to assess against the standard. There is therefore clear justification for the inclusion of the NDSS on the grounds of need.

81. In relation to viability, the Council originally commissioned viability work on the delivery of affordable housing and the Community Infrastructure Levy which included minimum internal space standards based on the London Plan to test whether the application of the standard would be viable. The Council commissioned an update to its viability work to assess the new optional standard. The update by Dixon Searle contained in the Cambridge City Council and South Cambridgeshire District Council Local Plan Viability Update (RD/MC/090) concludes that that application of the NDSS requirements are unlikely to impact on the viability of development.
82. In terms of timing, the original standards in the Plan as submitted demonstrated the Council's intention to seek to adopt minimum space standards. The new standards have now been extant for more than three years, and we are not persuaded that there is a need to include a transitional period in the modified policy.
83. Accordingly, **C152** which modifies the policy to adopt the NDSS, rather than locally set space standards, is justified and necessary to ensure conformity with national policy.

#### *Accessible Homes*

84. Policy 51 seeks to provide accessible homes. The Written Ministerial Statement March 2015: *Housing standards: streamlining the system* (WMS) introduced optional standards to replace the requirements of the Lifetime Homes and Lifetime Neighbourhoods standards. Planning Policy Guidance paragraph: 007 Reference ID: 56-007-20150327 sets out the necessary evidence base which Councils will need to demonstrate to set higher accessibility, adaptability and wheelchair housing standards.
85. In this respect, the Council has produced a document entitled *Accessible Housing in Cambridge*, January 2017 (AHC) which provides a study into accessible requirements in Cambridge for the emerging Plan. The AHC concludes that, based on the evidence, the optional Building Regulation M4(2): *Accessible and Adaptable Dwellings* should be applied to all new build homes and optional Building Regulation M4(3): *Wheelchair User Dwellings* should be applied in lieu of the Lifetime Homes Standard and the Wheelchair Housing Design Standard and should apply to 5% of all affordable housing developments of 20 units or more.
86. Whilst the approach in respect of Regulation M4(2) has been challenged by representors there is no compelling detailed evidence provided that would lead us to a contrary finding in this regard. Furthermore, the Viability Update, Final Report (October 2015) tested a range of options as agreed with the Council in respect of Regulation M4(2), namely 100%, 15% and 0% of dwellings complying with the standard. The results indicated although there is a minor impact on viability, this is marginal and the change in costs is not one that can be easily differentiated. On that basis we conclude that the modified policy will not have an unacceptable effect on viability and meets the requirements of PPG.

87. Accordingly, **C153, C154, C155, C156, C157, C158** and **C159**, which amend the policy to incorporate the requirements of the optional standard in lieu of the Lifetime Homes and Wheelchair Housing Design Standards, are justified and necessary to ensure conformity with national policy.
88. Policy 48 sets criteria for the consideration of proposals for Houses in Multiple Occupation. **C146** amends the final paragraph of the supporting text to remove the references to Lifetime Homes and replace it with references to Policies 50 and 51. This is necessary to ensure conformity with national policy.

#### *Flat conversions*

89. Policy 53 seeks to control the conversion of large single family dwellings or non-residential buildings to self-contained flats. The policy permits proposals for a conversion subject to the criteria set out in the policy text which relate to the internal gross floor area of the original dwellings including acceptable extensions and roof conversions, garden access, protecting the amenity, character of the area, highway safety and the amenity of future occupiers. The supporting text identifies the potential detrimental impacts on the immediate locality that could result as a consequence of a flat conversion and the requirements.
90. Paragraph 6.43 refers specifically to the parking stress that could arise as a result of a conversion. The paragraph requires a parking survey to be completed in support of planning applications for flat conversions. Parking stress is defined as occurring in those streets where surveys show that there is less than 10% free notional parking capacity although this requirement is relaxed in controlled parking zones.
91. Cambridge is a compact city and the issue of parking stress is therefore an important consideration when increasing levels of occupancy in a residential area. Uncontrolled parking arrangements would both increase the risk to highway safety and fail to promote a modal shift towards more sustainable modes of transport. **C161** and **C162** amend the supporting text to include guidelines to be followed when undertaking a parking survey and are necessary for the clarity and effectiveness of the Plan.

#### *Residential moorings*

92. Policy 54 aims to control the provision and location of residential moorings. The policy responds to the gradual increase in the number of boat owners wishing to live permanently on the River Cam. The Council is responsible for the management of existing residential and visitor moorings through a moorings management policy.
93. The policy permits residential moorings subject to meeting a number of criteria. **C163** amends criterion g. of the policy to require that moorings should not impede the use of any footpath. This is necessary to ensure consistency with paragraph 35 of the Framework which requires plans to give priority to pedestrian movements thereby protecting the use of sustainable transport modes.

94. Section 124 of the Housing and Planning Act 2016 amended section 8 of the Housing Act 1985 which now requires each local housing authority in England to consider the needs of people residing in or resorting to their district with respect to the provision of: (a) sites on which caravans can be stationed, or (b) places on inland waterways where houseboats can be moored. The Council advised, at the time this matter was considered at the Examination, that it had not carried out the assessment required under the Housing Act 1985(as amended). However, the information it does hold, relating to houseboats, suggests that the need for new moorings for residential houseboats is low. Site RM1 of the Plan provides for the delivery of off-line moorings.
95. Once the assessment of the needs of people requiring places where houseboats can be moored has been completed, it may be necessary to review Policy 54 which can be done as part of the wider review of the Plan (see issue 16 below).

### *Conclusion*

96. Subject to the inclusion of the main modifications, the Plan is consistent with national policy and will support and maintain a balanced supply of housing.

## **Issue 6 – Whether the Areas of Major Change and Opportunity Areas will deliver sustainable development to meet identified needs**

### *Areas of Major Change (AoMC) on the Edge of Cambridge*

97. Over 5,000 new dwellings in the Plan period will be provided in urban extensions with planning permission. These are large sites which straddle the boundary with South Cambridgeshire that were released from the Green Belt in previous rounds of plan making. Sites on the edge of the urban area will also provide land for employment uses and outdoor recreation.
98. Policy 13 sets out the general principles for development in the areas of major change and the opportunity areas. The policy sets the expectation that development in these areas should be of the highest quality design and incorporate the principles of sustainable design and construction. The policy criteria include the provision of the necessary infrastructure, a comprehensive implementation plan which has demonstrable support from all key landowners and clear objectives where a site-wide masterplan approach is adopted. The policy includes further requirements with regard to movement, density and activity, and the protection of existing assets including heritage assets. Modifications are necessary to correct the wording of criteria e, and to affirm that the assets to be protected include heritage assets. **C039 and C040**
99. The supporting text recognises that construction on several sites within the AoMCs is now well advanced and based on extant planning permissions. It further affirms the need to protect the conservation areas in these locations. In this regard, we have amended the wording of **C041** to remove the words "or adjoining" and amend 'character and appearance' to 'character or appearance' so as to accord with national policy and legislation. **C042**, which substitutes 'substantial' development for 'substantive' development is necessary for clarity and effectiveness.

*Cambridge East AoMC*

100. The portion of this site within the City boundary was removed from the Green Belt by the Cambridge Local Plan 2006. The Cambridge East AAP allocates land in the City and in the adjoining area within South Cambridgeshire for between 10,000 and 12,000 new homes with associated land for employment, services and facilities. The development was contingent upon the relocation of Marshall Aerospace. In 2010 Marshalls found that they did not have an appropriate site for relocation. Policy 12 of the submission draft plan supersedes policies CE/3 and CE/5 of the AAP and only allocates those parts of the site which were considered to be capable of development whilst the airport remains in operation.
101. During the course of the examination, however, the intention of the landowners has been clarified and it has been established that a wider area of land north of Cherry Hinton can be developed during the plan period. Development on the edge of Cambridge is recognised as being highly sustainable and this is one of the few locations which is not within the Green Belt. Issues relating to the impact of the continued operation of the airport can be addressed at the planning application stage, along with issues relating to the design and layout of new development and its relationship to existing development.
102. Modifications **C034, C035, C036, C038** and **C220** are necessary to reflect this up-to-date position and allocate an additional site (R47) for the development of approximately 780 dwellings. The MM establishes that a masterplan will be prepared for the development of site R47 and adjoining land in South Cambridgeshire and establishes the general parameters for the masterplan. The remainder of the AAP site will remain as safeguarded land. There are no exceptional circumstances to justify the return of the site to the Green Belt. **C037** is necessary to ensure the provision of adequate secondary school capacity.
103. Concerns have been raised in respect of the adequacy of the infrastructure to support the proposed development. However, Policy CE/10 of the AAP, which remains extant, requires adequate highway capacity to serve all stages of the development. The policy is wide ranging and includes primary road access, managing traffic impacts through transport assessments, and contributions in respect of capacity on existing orbital routes related to the volume of traffic generated by Cambridge East on those routes. Vehicular access to the site will only be permitted via a new spine road, except for emergency access.
104. Concerns have also been expressed that parts 2c to 2e of the policy indicate some conditionality with regard to the allocation. However, the rationale for introducing the policy changes is predicated on the principle that the residential amenity of future occupiers should not be compromised by the ongoing airport operations and that the proposed development will not therefore prejudice the continued use of the airport, and these are factors that will need to be taken into account through the development management process.

105. Taking all the above factors into account we are consider that the modified policy 12 is a sound approach which will boost housing supply in a sustainable location.

*Cambridge Northern Fringe East and new railway station AoMC*

106. Policy 14 sets out the proposals for the AoMC. **C043** and **C044** are necessary to ensure a consistent approach to the AoMC in this Plan and the emerging South Cambridgeshire Local Plan.
107. The area is allocated for high quality mixed-use development primarily for employment uses as shown on the Policies Map and illustrated in Figure 3.3 of the Plan. These include B1, B2 and B8 uses, as well as a range of supporting commercial, leisure and residential uses subject to acceptable environmental conditions. **C045** is necessary to clarify the primacy of employment use on the site.
108. The third paragraph of the policy confirms that the amount of development and timescales will be established through the preparation of an Area Action Plan (AAP). The AAP will be developed jointly between Cambridge City Council and South Cambridgeshire District Council. **C046** deletes the restriction on planning applications being considered before the adoption of the AAP. This is necessary to ensure flexibility and because local planning authorities are required to consider any planning application that is submitted to them.
109. The fourth paragraph of the policy contains criteria which relate to environmental and accessibility requirements and the need to ensure that due consideration is given to safeguarding the appropriate future development of the wider site. There are necessary changes to the wording of criterion b and d of the paragraph to ensure that a number of other wildlife sites are protected in this regard and these revisions are supported by Anglian Water, and Natural England and the Wildlife Trust respectively. **C047**
110. Paragraph 3.28 of the supporting text makes further reference to the early review of the site through the jointly prepared AAP in support of the policy text and acknowledges that the majority of the site is in Cambridge City. This is consistent with the text in Policy SS/4 of the South Cambridgeshire Local Plan. The changes to the wording of the paragraph are necessary to align with and expand upon the policy text, to make the Plan effective. **C048**
111. Paragraph 3.29 refers to the Cambridge Busway and cycle and car parking provision and affirms that the new station will significantly improve access to and from the business parks and science parks in this locality. **C049** affirms that as a consequence of the changes, the station area will provide an attractive location for business uses and is necessary to ensure a consistent approach in this Plan and the emerging South Cambridgeshire Local Plan.
112. **C050** adds a further paragraph reinforcing that the new station will provide a catalyst for the regeneration of the area and will bring forward further phased delivery elsewhere in the AoMC. In order to achieve consistency with **C046** above, we have made a minor amendment to the wording of the third sentence of the paragraph.

113. **C051** replaces paragraph 3.30 of the supporting text with a new paragraph which makes it clear that any development will need to be assessed against the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Site Specific Proposals Plan (2012). This in order to ensure that development does not compromise the safeguarding areas relating to the aggregates railhead and that a consistent approach is achieved between this Plan and the emerging South Cambridgeshire Local Plan.
114. **C052** deletes the final sentence of paragraph 3.31 as it is no longer necessary nor is it consistent with the emerging South Cambridgeshire Local Plan.
115. The relocation of the Cambridge Water Recycling Centre is currently being explored but no conclusions have yet been reached. **C053** is necessary to more clearly reflect the current situation. We have made minor amendments to **C053** to ensure flexibility and effectiveness.
116. **C054** is necessary to make it clear that Highways England should be consulted in respect of strategic road network issues relating to the AoMC. **C055** is necessary to ensure that the supporting text and Figure 3.3 are consistent with the policy as amended.
117. An extension of the AoMC is identified on the amended Figure 3.3 (**C056 and C057**). This relates to the extension of the southern portion of the Chesterton Sidings site. This parcel of land is to be included within the AAP. The development of this area will help facilitate the delivery of public transport infrastructure including walking and cycling routes alongside the proposed guided bus extension. The extension of the AoMC would therefore accord with paragraph 29 of the NPPF which requires the transport system to be balanced in favour of sustainable transport.

*South of Coldham's Lane AoMC*

118. Policy 15 sets out the proposals for the AoMC. The Council is seeking the wider regeneration of the area with appropriate redevelopment and the creation of a country park to the east of the city as indicated on Figure 3.4 (as amended) in the Plan. This will involve the development of a masterplan which will include setting out the principal uses, amount of development and the extent of developable land. Modifications **C058 – C062** are necessary to clarify the proposals for different parts of the AoMC and to ensure the Plan is effective and in conformity with paragraphs 117 and 118 of the NPPF.
119. The policy indicates development will be supported where certain criteria are met. These include responding appropriately to the nature of existing site conditions, environmental and safety constraints, the need for detailed feasibility reports, the form and nature of public access to the Country Park, and ecological mitigation and/or enhancement measures. In response to the latter, the Wildlife Trust has indicated that the baseline date for assessing whether mitigation or enhancements have been achieved as required by the policy should be set as 2005 as this was the date of the last full survey. We consider this to be reasonable and have made a minor wording change to **C060** to reflect this and ensure conformity with paragraph 152 of the NPPF which requires local planning authorities to seek opportunities to achieve the environmental dimension of sustainable development and seek a net gain for

this dimension. Our recommended MM provides a benchmark for the ongoing assessment of such net gains.

#### *Southern Fringe AoMC*

120. Policy 17 sets out the proposals for the AoMC. The area encompasses Clay Farm, Trumpington Meadows, Bell School and Glebe Farm as identified on Figure 3.5 of the Plan and is proposed to deliver high quality new neighbourhoods for Cambridge.
121. The policy indicates that the principal land use will be a mix of residential properties, including affordable housing. It does however enable the development of other uses necessary to create a sustainable and vibrant community. These include community and education facilities, with 5.6ha of land allocated for a primary and secondary school, local shops and other services, and open space and recreation.
122. **C063** is necessary to strengthen criterion g. of the policy to ensure that development of a high quality urban edge will be achieved on the approach to the site from the south. This will align the policy with Policy 56 of the Plan which seeks to create successful places through the promotion of high quality design and is necessary to ensure that the Plan is effective.

#### *West Cambridge AoMC*

123. Policy 18 sets out the proposals for the AoMC. The principal land uses for new development are D1 educational uses, associated sui generis research establishments and academic research institutes, along with commercial research, all of which is directly associated with the University of Cambridge (UoC).
124. **C064** is necessary to amend unduly restrictive and unjustified criteria relating to the uses that will be permitted. It also introduces a reference to the existing masterplan for the site, which is not consistent with the Statement of Common Ground (SoCG) which was agreed between the Council and the UoC in March 2015 with regard to Site M13 which refers to the submission of a new masterplan. Consequently, we have made a minor change to the wording of **C064**. **C065** and **C066** are necessary to ensure clarity and consistency with the modifications made by **C064**. **C225** amends the wording of the existing uses to align with Policy 18.

#### *Land between Huntingdon Road and Histon Road AoMC.*

125. Policy 19 sets out the proposals for the AoMC. **C067** and **C068** update the policy and supporting text to more closely reflect the scheme that has been granted outline planning permission. **C221** amends the entry for this site in the Proposals Schedule at Appendix B to take account of the 84 dwellings that have already been built.

#### *Areas of Major Change within the urban area*



*Station Areas West and Clifton Road AoMC*

126. Policy 20 sets the framework for the consideration of development proposals which will be expanded upon through the preparation of SPD for this area of the City Centre. The aim is to create a new mixed use neighbourhood in a highly sustainable location. **C069** is necessary to provide flexibility for non-major planning applications to come forward before the SPD is prepared. **C070** is necessary to ensure that full consideration is given to ensuring sustainable access to the railway station.
127. Betjeman House (site R44) is designated for residential use. **C222** adds employment and retail uses which ensures consistency with the vision of Policy 20 for a mixed use neighbourhood.

*Mitcham's Corner Opportunity Area*

128. The character and appearance of this area of the City centre has been adversely affected by the road engineering works carried out in the 1970s. It nonetheless retains a variety of small shops and a vibrant community. **C071** is necessary to establish that proposals for the area will be expanded upon through the preparation of SPD, rather than a masterplan. **C072** is necessary to ensure that the palette of materials is 'appropriate' rather than 'simple'. The latter would not necessarily lead to harmonious development and would not therefore be effective. **C073** extends the boundary of the area which is necessary to enable a comprehensive approach along the riverside frontage.

*Eastern Gate Opportunity Area*

129. This is an area which stretches along one of the main radial routes into the City centre. The area is already subject to an adopted SPD which seeks to improve the public realm and improve the quality of new development in the area. **C074** is necessary to clarify the approach to new development, responding to the primarily residential nature of the area. **C075** is necessary to ensure that the palette of materials is 'appropriate' rather than 'simple'. The latter would not necessarily lead to harmonious development and would not therefore be effective. **C076** is necessary to clarify the approach that will be taken in relation to building heights.

*Mill Road Opportunity Area*

130. Mill Road is a vibrant mixed use area in the historic core of the City. One of the principal aims of Policy 23 is to enhance the streetscape and undertake public realm improvements. **C077** is necessary to clarify the meaning of 'events in the road network'. The policy also refers to providing 'more generous' pavements but the Council accepts that opportunities to widen the pavements are limited. **C078** and **C081** clarify the kind of improvements that may be achievable to the pedestrian environment and are necessary to ensure the Plan is effective and deliverable. **C079** is necessary to ensure that the palette of materials is 'appropriate' rather than 'simple'. The latter would not necessarily lead to harmonious development and would not therefore be effective.

131. **C080** is necessary to clarify the importance of the Conservation Area status of much of the Opportunity Area. **C082 - C085** are necessary to ensure appropriate recognition of heritage assets within the Opportunity Area.
132. There are several development sites in the Opportunity Area including the Mill Road Depot (site R10). Concerns were expressed about the proposals for this site including the density of development proposed and the means of access. In our view it is appropriate that the density of development should reflect that of the surrounding area in this highly sustainable city centre location. Given the former use of the site as a depot it is unlikely that residential use of the site will compromise highway safety but that will be subject to detailed testing through the development management process. **C086** is necessary to accurately reflect the intention to improve the existing access. **C217** adds an expectation that a planning and development brief will be prepared for the site, which is necessary to ensure successful integration with the existing residential area.
133. Site R21 on Mill Road is allocated for residential and employment use. **C224** updates the area of the site following a more detailed assessment. It also includes healthcare as a potential use to reflect the view of the local CCG NHS Trust that there will be a continuing need for healthcare uses on the site. It also adds 0.6ha for student accommodation to reflect an appeal decision in 2016. This MM is necessary to ensure the allocation is deliverable and effective.
134. A substantial development site at 75 Cromwell Road (Site R12) lies outside the Opportunity Area but is close to it. **C218** adds a requirement for the preparation of a development brief which is necessary to ensure successful integration with existing development.

*Cambridge Railway Station, Hills Road Corridor*

135. Hills Road is a major link from the City centre to the station. Significant new development has taken place near the station, known as the CB1 scheme. The aim of the Opportunity Area designation is primarily to improve this link for sustainable modes of transport through an improved pedestrian environment. The details of the key projects listed in Policy 24 will need to be tested as schemes are brought forward but we are satisfied that the aims of the policy are sound and that there is a reasonable prospect they can be delivered.
136. **C087** is necessary to ensure that the palette of materials is 'appropriate' rather than 'simple'. The latter would not necessarily lead to harmonious development and would not therefore be effective. **C088**, which extends the boundary of the area to include properties at 1 Regent Street and Furness Lodge, is necessary to ensure a comprehensive approach to development.

*Old Press/Mill Lane*

137. This Opportunity Area lies in the historic core and accommodates a range of academic and administrative facilities of the University of Cambridge. The university wishes to relocate some of these uses, which offers the opportunity for redevelopment. The submission draft policy sought residential and other

uses on the site. However, work undertaken by the University demonstrates that mainstream housing will not be viable, and the policy should specify student accommodation. (**C089, C226**)

138. **C090** is necessary to ensure proposals have regard to the most recent Historic Core Conservation Area Appraisal. This is necessary to ensure conformity with the NPPF and is supported by Historic England.

139. The Council has proposed a MM to add a reference to bridleways as well as footpaths. This may be viewed as an improvement to the Plan but it is our view that the Plan could not be considered unsound without it.

#### *Conclusion*

140. The Areas of Major Change and Opportunity Areas promote development in the top two tiers of the sustainable development strategy i.e. within the urban area and on the edge of the urban area. The identification of these areas in the Plan will enable a comprehensive approach to the provision of sustainable development to meet identified needs within the plan period.

### **Issue 7 – Whether the Plan will provide sufficient measures to protect, preserve and enhance the built environment.**

#### *Design of new buildings*

141. Policy 57 seeks to support high quality new buildings in the city by establishing criteria that development proposals should meet. The criteria are wide ranging and include setting, height, scale, form, accessibility, adaptability, environmental impacts, and the maintenance and increase of biodiversity in the built environment. **C164** amends the wording of criterion h to require an appropriate scale of features and facilities to maintain and increase levels of biodiversity. **C165** adds a further sentence to the supporting text of Policy 57 to ensure that new developments seek to maximise opportunities to support biodiversity and to further reinforce the need to incorporate appropriate features in this regard. The changes echo the requirements of paragraph 118 of the Framework which aims to conserve and enhance biodiversity.

#### *Tall buildings and the Cambridge Skyline*

142. Policy 60 aims to ensure that the development of tall buildings which break the skyline and/or are significantly taller than the surrounding built form are considered against specified criteria. **C166** makes a number of modifications to the wording of the policy including: replacing the reference to specific heights of tall buildings with more flexible wording which also accords with the reference to tall buildings in paragraph F.9 of Appendix F (Tall Buildings in the Skyline) of the Plan; and to refer to Historic England's Good Practice Advice in Planning: 3 'The Setting of Heritage Assets (2015). The modification is therefore necessary for consistency within the Plan and to accord with the requirements of paragraph 126 of the NPPF.

143. **C167** replaces paragraphs 7.16 to 7.19 with six new paragraphs. The changes are referred to in paragraphs 3.52 and 3.53 of the Statement of Common Ground (SoCG) between the Council and Historic England dated May 2016.

Historic England has commented that the six new paragraphs provide a more appropriate context for the policy as modified and provides a link to Appendix F of the Plan and we consider they are necessary for effectiveness.

144. The paragraphs provide more detail in respect of the various locational and historic contexts in relation to the future development of tall buildings. The paragraphs assert that a critical factor is the impact on heritage assets due to the large number of designated heritage assets within the historic core. These include a significant number of highly graded heritage assets of great national importance. For this reason, there will be limited scope for tall building proposals in or around the historic core.
145. We have made minor amendments to the wording of the MM for the purposes of clarity. We consider that the above changes to the policy are necessary to protect the character and appearance of the city and its wider environs, and the historic core in particular.
146. **C237-C249** are modifications to Appendix F which provides guidance on Tall Buildings and the Skyline. These modifications are necessary to ensure internal consistency and clarity and, therefore, the effectiveness of the Plan.

#### *Conservation and Enhancement of Cambridge's Historic Environment*

147. Policy 61 seeks to protect and enhance Cambridge's historic environment. The policy sets out a number of criteria against which development proposals will be considered. These include the preservation and enhancement of heritage assets, safeguarding the character or appearance of conservation areas, the contribution to local distinctiveness, and consideration of scale, form, and height and massing. Our recommended MM **C168** makes changes to the wording of the policy in order to ensure consistency with national policy.
148. **C169** amends the supporting text to the policy to reinforce the importance of preserving the historic and natural environment of Cambridge. The changes are supported by Historic England and are necessary for consistency with paragraph 126 of the NPPF. **C170** and **C171** add further explanation of the multi-layered approach to the strategy for the management of the historic environment. Figure 7.1 is introduced into the supporting text and sets out the documents which together comprise the Cambridge Historic Environment Strategy. This approach is supported by Historic England and we consider that the range of documents in Figure 7.1 will collectively provide a positive strategy for the historic environment which is necessary to ensure that the requirements of paragraph 126 of the NPPF are fully met. **C172** and **C173** add additional wording to the supporting text in order to make the paragraphs consistent with the requirements of paragraph 132 of the Framework.
149. **C223** which relates to Betjeman House (site R44), is necessary to ensure the appropriate consideration of heritage assets, in line with national policy.

#### *Local Heritage Assets*

150. Policy 62 aims to support the retention of local heritage assets as assessed against the criteria in Appendix G (Local Heritage Assets Criteria and List) of

the Plan. **C174** adds a further sentence to the text of the policy to clarify the requirements associated with a proposal that would lead to harm or substantial harm to a non-designated asset. Paragraph 135 of the Framework makes no reference to the demonstration of the wider public benefit and accordingly, we have amended the wording of the MM to align with national policy. **C250** and **C251** update and clarify aspects of Appendix G and are necessary to ensure the Plan is effective.

151. Policy 63 relates to works to a heritage asset to address climate change. The policy affirms that proposals to enhance the environmental performance of heritage assets will be supported where the overall design and specification ensures that the significance of the asset is not compromised. Our recommended MMs **C175**, **C176** and **C177** make revisions to ensure that the policy accords with paragraphs 133 and 134 of the Framework.
152. **C228** is necessary to clarify that the schedules of listed buildings, scheduled monuments, and registered parks and gardens are the responsibility of Historic England. The Council has proposed various other MMs to Appendix C: Designations Schedule to update the listings. These modifications would improve the Plan but are not necessary for soundness.

### *Conclusion*

153. The Plan contains a range of policies relating to the built environment. Subject to the inclusion of the modifications referred to above, we find that the Plan is consistent with national policy and will provide sufficient measures to protect, preserve and enhance the built environment.

### **Issue 8 – Whether the Plan will provide sufficient measures to protect, preserve and enhance the natural environment.**

#### *The River Cam*

154. Policy 7 seeks to recognise the very significant historic, cultural and landscape importance of the river to the city. The supporting text refers to the Cambridge Landscape Character Assessment (2003) which states that the River Cam is a key part of the defining character of Cambridge. A number of Cambridge's colleges interface with the river known as The Backs which is one of the world famous landscapes in Cambridge. The river is an international tourist attraction and contributes to the Cambridge economy. **C001** is necessary to ensure that the spatial strategy fully reflects the importance of the river.
155. The policy sets out a number of criteria which development along the River Cam corridor is required to meet. **C023** strengthens the wording of criteria b and d to clarify the significance of Cambridge's historic environment in relation to the river and to ensure that any naturalisation of the river does not impact detrimentally on heritage assets.
156. **C024** amends paragraph 2.69 of the supporting text to confirm that, although the river is almost entirely modified by human action and its wildlife value has been depleted by river works, it still supports a healthy population of fish and

other river dwelling animals. The modification also affirms that the river and its floodplain habitats and tributaries function together as an ecological network requiring enhancement.

### *Setting of the City*

157. Policy 8 seeks to preserve the setting of the city by establishing a number of criteria to guide development on the edge of the urban area. **C025** amends the wording of the policy to ensure consistency with paragraph 112 and 114 of the Framework.
158. **C026** adds information on the Cambridge Natural Environment Strategy. The multi-layered approach adopted is supported by Natural England and is necessary to ensure consistency with paragraph 117 of the NPPF.

### *Open Space*

159. Policy 67 seeks to ensure that open space is protected. **C178** and **C179** are necessary to ensure clarity and effectiveness, including the requirement for an assessment to be carried out against the criteria set out in Appendix I (Open Space and Recreation Standards) of the Plan where a proposal would involve the loss of open space. The definition of open space in the NPPF refers to all open space of public value. The assessment required is therefore whether a particular area of open space would be of public value. It is recognised that there are other policies in the Plan which relate to assessments which include open space considerations. However, the context is specific to the potential loss of open space. The modifications are therefore necessary to ensure consistency with national policy.
160. Policy 68 aims to ensure that residential development contributes to the provision of on-site open space and recreation facilities. **C180** is necessary to ensure that where there are deficiencies in certain types of open space provision in the locality, the proposed development will be required to provide the type of open space most needed. We consider this approach to be justified as it accords with paragraph 74 of the Framework and the modification is necessary to ensure the effectiveness of the Plan.
161. **C181** adds a reference to the Council's Playing Pitch Strategy (PPS) and Indoor Sports Facility Strategy (ISFS) [adopted after the submission of the Plan] both of which are relevant to the calculation of open space requirements. The policy also clarifies the provision through planning obligations of off-site open space provision. This modification is necessary for clarity and effectiveness.
162. **C182** adds a new paragraph to the supporting text in order to provide clarity as to how large windfall sites, which are not accounted for in the PPS and ISFS, should be considered at the planning application stage. The policy also requires that all development proposals contribute to the provision of open space and recreation facilities on site. We consider that the approach set out in the paragraph is appropriate to ensure that such proposals take full regard of the strategies and to ensure that the Plan is therefore effective.

163. **C252 – C257** make various amendments to Appendix I open Space and Recreation Standards which are necessary to ensure consistency with Policy 68.

#### *Biodiversity and Geodiversity*

164. Policy 69 seeks to protect sites of biodiversity and geodiversity. **C183 – C186** make a number of changes and additions to the Policy and supporting text which are necessary to achieve clarity and ensure consistency with paragraphs 113, 117 and 118 of the NPPF. **C227**, which relates to site U3 Grange Farm off Wilberforce Road, introduces a requirement to ensure that the development of the site will not prejudice its biodiversity thereby meeting the requirements of policy 69. The MM is supported by Natural England and is necessary to ensure consistency with national policy.

#### *Trees*

165. Policy 71 aims to ensure that existing trees are appropriately protected. **C187** strengthens the policy by clarifying the way in which development which would lead to the felling of or damage to trees will be considered and is necessary to ensure clarity and effectiveness.

#### *Agricultural Land*

166. **C027** adds a new paragraph to the plan relating to the protection of the best and most versatile agricultural land, where possible, and is necessary to ensure consistency with paragraph 112 of the NPPF.

#### *Conclusion*

167. The Plan contains a range of policies relating to the natural environment. Subject to the inclusion of the modifications referred to above, we find that the Plan is consistent with national policy and will provide sufficient measures to protect, preserve and enhance the natural environment.

### **Issue 9 – Whether the Plan provides sufficient measures to support the Cambridge economy?**

168. Section Five of the Plan: *Supporting the Cambridge Economy* states that Cambridge has a successful local economy that is resilient and dynamic. It further states that the University of Cambridge has helped develop Cambridge as a centre for excellence in the fields of education and research. The Plan aims to strengthen and diversify Cambridge's economy and enable a range of job opportunities across the city.

#### *Development and Expansion of Business Space*

169. Policy 40 seeks to encourage new offices, research and development facilities to come forward in specific locations. The supporting text indicates a forecast growth of 22,100 net additional jobs in Cambridge by 2031, including a net gain of some 8,800 jobs relating to class B uses. For purposes of clarity and effectiveness, **C119** adds a further sentence to paragraph 5.6 of the supporting text to make it clear that proposals for development will be

considered alongside the policies in Section 3 of the Plan which relates to the city centre, AoMCs, opportunity areas and site specific proposals.

170. **C120** updates Table 5.2 which relates to planning permissions granted on key employment sites to March 2017. This is necessary to provide an up-to-date framework for the consideration of planning applications, and to ensure consistency throughout the Plan.

#### *Protection of business space*

171. The Employment Land Review, as updated in 2012, noted a significant loss of industrial floorspace. The Council recognises that maintaining a good supply of employment land is essential to the Cambridge economy. Policy 41 seeks to safeguard against loss of both floorspace and land within protected industrial sites shown in the Policies Map, and sites outside the protected sites. In relation to sites outside the protected industrial sites **C121** and **C122** which allow for temporary changes of use which generate employment opportunities while marketing of the site is proceeding, and clarify that the policy will not apply to sites in employment use that are allocated for another use are necessary to ensure an appropriate level of flexibility.
172. **C123** and **C124** amend the supporting text to clarify that the policy only seeks to protect employment uses from change of use where a planning application (including a variation of a condition) is required, and to refer to Appendix K of the Plan with regard to the marketing of sites. The changes clarify the way in which the policy should be interpreted and implemented and are necessary to ensure the effectiveness of the Plan.

#### *University Development*

173. The Plan recognises the importance of higher education, including the University of Cambridge (UoC) and Anglia Ruskin University, to the economy of the City. Policy 43 seeks to support the development and redevelopment of faculty, research and administrative sites relating to the two universities. The Council proposed modifications to change the title and subtitles of the policy but we are not persuaded that these are soundness issues. **C127** which amends criterion a of the policy to refer to making effective use of land, rather than optimising the use of land, is necessary to ensure appropriate flexibility.
174. The supporting text asserts that the UoC continues to be a world leader in higher education and research and is consistently ranked in the top three research universities globally based on two internationally recognised measures. It is a vital driver of the Cambridge economy and is the reason why so many high technology and knowledge-based employers decide to locate to the city. The University provides over 12,000 jobs.
175. UoC has plans to grow undergraduate and postgraduate numbers by 0.5% and 2% respectively in order to maintain its position as a globally successful university.
176. During the examination the Council updated its assessment of demand for and supply of student accommodation. **C005** is necessary to ensure that regard is had to the most up-to-date evidence available.



177. The policy indicates that within the city centre, the development of the uses set out in the first paragraph will be permitted subject to criteria which include making effective use of the land, including a mix of uses on larger sites to meet the needs of the institution and the improvement of circulation for pedestrians and cyclists together with public realm improvements, reductions in car parking provision and the creation of active frontages.
178. The policy also refers to two allocated sites within the city centre namely: mixed use redevelopment of the Mill Lane/Old Press site (Policy 25) and the New Museums site (U2). In addition, development of sites in the Eastern gateway or near East Road should also be considered for including a significant element of university development. Beyond the city centre, two sites will provide opportunity for enhanced faculty and research facilities.
179. Cambridge Biomedical Campus (Policy 16) will provide the development of medical teaching and research facilities and related university research institutes at the campus along with the continued development of the West Cambridge site at Madingley Road (Policy 18). **C129** which adds the words "and research" to criterion e of Policy 43 is necessary to correct a clear omission and ensure consistency with Policies 16 and 18.
180. **C130** is necessary to clarify the position regarding the preparation of Supplementary Planning Documents (SPD) for Mill Lane/Old Press site and for the New Museums site. The modification also identifies a number of other sites with the potential for change to occur during the Plan period. The modification is necessary for clarity and effectiveness.
181. The Council accepts that the Mount Pleasant House (site R17) site will not be deliverable for mainstream housing. **C219** amends the capacity of the site from 50 dwellings to 270 student rooms. This is necessary to ensure that the proposal will be deliverable and effective.

### *Specialist Colleges and Language Schools*

182. Policy 44 aims to ensure that development of new specialist colleges and language schools provide the necessary supporting accommodation. The policy indicates that existing and new specialist colleges and/or language schools will not be permitted unless they provide residential accommodation, social and amenity facilities for all non-local students. **C131** amends the policy to clarify that the use of family dwellinghouses to accommodate students is not appropriate. This is consistent with Section 6 of the Plan which seeks to maintain a balanced supply of housing.
183. **C132** and **C133** make largely minor changes to the supporting text of the policy but we have concluded that these modifications are necessary for clarity and to ensure consistency. We have however amended the wording of the final sentence of **C132** in order to accord with the thrust of the paragraph as a whole.

### *Conclusion*

184. The Plan contains a range of policies to protect existing employment floorspace, where appropriate to do so, and to support the creation of new employment floorspace. Subject to the inclusion of the modifications indicated above, the Plan is consistent with national policy and will provide sufficient measures to support the Cambridge economy.

### **Issue 10 – Whether the strategy for the City Centre and retail development is sound.**

#### *Hierarchy of centres*

185. Policy 6 establishes a hierarchy of centres to which retail and other town centre uses are directed in line with the sequential approach set out in the Framework. The position of individual centres within the hierarchy is broadly based on the findings of the Cambridge Retail and Leisure Study Update 2013 (RD/E/130) (the 2013 Retail Study). We consider that the Beehive Centre has the characteristics of a retail warehouse park with extensive car parking and a predominance of shops selling bulky goods and are not persuaded that it should be included in the hierarchy of centres.

186. Trumpington Local Centre includes the parades of shops on the High Street. The Local Plan extends the centre by including a number of retail/service units and the Village Hall, which adjoin the existing Centre. The large Waitrose store to the south of the Centre has the characteristics of an out of centre convenience store with a large car park and poor pedestrian linkages with the Local Centre. We do not consider that it would be appropriate to include it within the Centre or upgrade Trumpington to a District Centre.

187. We conclude, therefore, that the hierarchy of centres in the Plan, as submitted, is sound.

#### *Impact assessment threshold*

188. Policy 6 also sets a threshold of 2,500 sq. metres above which a retail impact assessment will be required. This is the same as the default threshold included in the Framework, and is supported by the conclusions of the 2013 Retail Study. Given the evident vitality and viability of the City Centre there is no evidence to support a locally set lower threshold. The policy includes a clause that would enable the Council to require an impact assessment below the threshold where it has concerns about a cumulative impact or an impact on the role or health or nearby centres in the same catchment area. We consider this approach to be justified by local circumstances, bearing in mind the proposed development of new retail centres at various locations on the edge of the City during the plan period, including Clays Farm and the North West Cambridge Growth Area, and the difficulty of predicting the cumulative impact of such centres on the health of the City Centre.

#### *New retail development*

189. The Retail Study 2013 identified no capacity to support additional convenience floorspace in the City, largely as a result of existing commitments. A limited capacity for additional comparison goods floorspace is identified, which it is

expected will be met mainly by redevelopment at the Fitzroy/Burleigh/Grafton area (see below). The Retail Study advises that there is a considerable degree of uncertainty in forecasting over the plan period, and that the Council will need to keep this matter under review. **C022** is necessary to reflect the uncertainty expressed in the retail study. There is no convincing alternative evidence on retail forecasting before us and therefore we find the plan's approach to meeting future retail development needs to be sound, subject to the inclusion of **C022** to ensure the effectiveness of the Plan.

### *City centre*

190. Cambridge city centre is the most dominant comparison shopping destination in the sub-region. The main shopping area comprises two distinct areas, the Historic Core and the Fitzroy/Burleigh Street area (including the Grafton centre), which is located a short distance to the east of the historic core. The Historic Core includes high street multiple retailers, as well as a range of independent shops. The heritage assets of the Historic Core impose constraints, such as the limitations on vehicular access, but are also a fundamental part of its attraction to shoppers and tourists. The historic core has lower vacancy rates than the national average.
191. The Fitzroy/Burleigh/Grafton area includes more mainstream retailers and leisure uses, including a cinema. The age and nature of the shopping units, particularly along the Burleigh Street frontage and in the 1980s built Grafton Centre offer scope for improvement and modernisation. Policy 11 establishes this area as the primary focus for providing additional comparison retail in the City Centre, along with other town centre uses and residential accommodation. **C032** includes an indicative figure for the quantum of new floorspace to be provided which is necessary to ensure that the Plan provides an appropriate foundation for the preparation of a Masterplan/SPD. Given the evident health of the historic core, including the low vacancy rates, and the constraints to new development, we are not persuaded that new development or refurbishment in the Fitzroy/Burleigh/Grafton area will have a detrimental impact on the historic core. Policy 11 also identifies key requirements that development should meet. **C032** adds to the Policy a reference to ensure that development is sensitive to the character and setting of the historic core. This will ensure consistency with national policy.
192. **C033** adds a reference in the reasoned justification to Policy 11 that any student accommodation delivered in the area would be expected to address the identified needs of Anglia Ruskin University, as the site is close to the East Road Campus. This is necessary to ensure consistency with Policy 46 of the Plan.

### *Development in the Primary Shopping Area*

193. Policy 10 seeks to ensure that the number of retail (A1) uses does not fall below 70% in the designated primary frontages, and below 50% in the designated secondary frontages. There is a degree of flexibility to change to another defined centre use where it can be shown that the change would be beneficial to the vitality and viability of the frontage. **C029** and **C030** are necessary to ensure that the text of the reasoned justification is consistent with the intent of the policy.

### *District, Local and Neighbourhood Centres*

194. Policy 72 seeks to ensure that new A1 (shop uses) will only be permitted in proportion to the scale and function of a particular centre. The policy text sets out a number of criteria against which a new development proposal will be considered. The policy also sets a requirement that the number of properties in A1 use should not fall below 55% in district centres. In the local and neighbourhood centres, the requirement is to retain an appropriate mix and balance of uses to provide the day to day needs of local people. **C189** clarifies the approach to uses that will be acceptable on all floors in the designated centres and is necessary for clarity and effectiveness.

### *Conclusions*

195. Subject to the inclusion of the identified MMs, the Plan includes a sound strategy for the city centre and retail development.

## **Issue 11 – Whether the Plan will facilitate the provision of local services and facilities and visitor accommodation**

### *School Provision*

196. **C006** which adds information to Table 2.1 of the Plan is necessary to ensure that shortfall of secondary school places is identified in the Plan together with the intention to meet that need in the eastern part of Cambridge. This is consistent with proposals for Cambridge East (policy 12).

### *Community, Sports and Leisure Facilities*

197. Policy 73 sets out the requirements for the provision of community, sports and leisure facilities, including the loss of such facilities. In terms of new facilities, the policy text differentiates between community and city-wide or sub-regional facilities. **C190** and **C191** add references to the Playing Pitch Strategy (PPS) and the Indoor Sports Facility Strategy (ISFS) which provide up-to-date information to be taken into account in making decisions on planning application. The MMs are therefore necessary for clarity and effectiveness and are supported by Sports England.

198. **C192** seeks to change the wording of paragraph 8.13 to indicate that the PPS and ISFS did not identify any need for a community stadium. However Sports England advises that an assessment of the need for a community stadium was not part of the brief for the PPS. We have made a minor revision to the wording of the MM to reflect that. **C193** removes reference to 'sports' to ensure consistency with the Plan as a whole.

### *Healthcare Provision*

199. Policy 75 seeks to ensure that new or enhanced healthcare facilities are supported subject to certain criteria. The policy affirms that these facilities will be permitted subject to a number of criteria which include scale, range, quality, accessibility, the need to be located in the area which they will serve and, where possible, co-located alongside complementary services. The policy

also requires new primary healthcare facilities to be provided in locations which are supported by sustainable modes of transport. The Council suggested modifications to change the way in which health organisations are referred to. We do not consider this to be a soundness issue.

#### *Visitor Accommodation*

200. Policy 77 aims to support proposals for high quality hotel accommodation in appropriate locations. However, the city is a significant visitor destination and we find there to be no justification for limiting provision to hotels. **C196** and **C197** widen the remit of the policy to refer to visitor accommodation. **C203 - C206** similarly amend the text of policy 78 to refer to visitor accommodation, rather than hotels or guesthouses. These MMs are necessary to ensure the Plan is internally consistent and effective. **C199** is necessary to promote the use of sustainable modes of transport, in accordance with the aims of national policy.
201. Policy 77 states that aparthotels or serviced apartments will be treated as residential uses. Legal advice obtained by the Council advises that such accommodation may fall within either use class C1 or C3 depending on the precise nature of the proposed development and the terms on which it is proposed to be offered for occupation. We find no reason to disagree.
202. **C198, C201 and C202** are necessary to reflect this legal advice and to provide a sound policy context for the consideration of proposals for aparthotels and serviced accommodation and thus to ensure the Plan is effective.

#### *List of Protected Public Houses*

203. The Council has suggested main modifications to update the list of protected public houses but we are not persuaded that this is a soundness issue. It is a matter which can be addressed when the Plan is reviewed and through the monitoring framework for Policy 76 as set out in Appendix M (see issue 15 below).

#### *Conclusion*

204. Subject to the inclusion of the MMs we recommend, the Plan is consistent with national policy and will facilitate the provision of local facilities and services and visitor accommodation.

### **Issue 12 – Whether the policies addressing climate change and the management of natural resources are justified and consistent with national policy**

#### *Technical standards related to the construction or performance of new buildings*

205. Policy 27 of the Plan seeks to ensure that new development incorporates the principles of sustainable design and construction and assists in meeting the challenges of a changing climate. The Deregulation Act 2015 requires that local planning authorities should not set any additional local technical standards related to the construction or performance of new dwellings. Modifications **C093 – C100** are necessary to ensure that the Policy is

consistent with the Deregulation Act 2015 and the Written Ministerial Statement of 25 March 2015 as, amongst other things, they: remove reference to the Code for Sustainable Homes; bring water efficiency standards into line with the optional national technical standards; and note that a requirement for carbon efficiency standards for new homes will only apply until commencement of the relevant amendments to the Planning and Energy Act 2008. There is clear evidence that the City is located within an area of water stress (RD/CC/100) which justifies the imposition of the optional national standard.

206. The requirements of the Policy relating to non-residential dwellings (the BREEAM standards) have been shown to be viable in the City through the work undertaken for the CIL Viability Assessment (RD/T/200). The BREEAM excellent standard has been achieved at a range of schemes in the edge of Cambridge growth sites. The policy includes a viability clause so that the standard can be relaxed if its achievement is not economically viable or technically feasible. We are satisfied that the policy accords with PPG 009 Ref ID: 6-009-20150327.

#### *Renewable and low carbon energy generation*

207. The WMS of 18 June 2015 set out new considerations to be applied to proposals for wind energy, including a requirement that the site should have been identified as suitable for wind energy development in a Local or Neighbourhood Plan. The WMS was published after the plan had been submitted for examination. **C101** is necessary to clarify that applications for wind turbines will be considered against the WMS not Policy 29 of the Plan. **C103** clarifies that this is an issue which will be reconsidered when the Plan is reviewed.
208. The Council has suggested modifications to policy 30 which deals with energy efficiency improvements to existing dwellings. These are not, in our view, soundness issues. In addition, in our view, it is not necessary for soundness to make explicit reference to the NPPF in connection with energy schemes and safeguarding the natural and historic environment.

#### *Flood risk and water management*

209. Policies 31 and 32 deal with water management and flood risk. **C106** is necessary to clarify that groundwater protection is a factor to be taken into account to ensure the effectiveness of the Plan.

#### *Other policies*

210. Policies 33 - 36 deal with matters such as contaminated land, light pollution, noise and air quality. We are satisfied that these policies deal with planning issues in accordance with the NPPF and PPG and do not simply replicate the role of other pollution control authorities. **C107 – C118** propose changes to these policies. Taken as a whole they add clarity to the way in which the policies will be implemented and bring the Plan into line with current national policy by, for example, recognising that PPG24 has been revoked.
211. **C218** relates that part of site R12 which is within the air quality management area and requires a planning and development brief in support of a planning

application for proposed residential development. This approach is consistent with national policy in order to deliver sustainable development.

### *Conclusions*

212. Subject to the inclusion of the MMs referred to above we are satisfied that the Plan is consistent with national policy.

### **Issue 13 – Whether the plan makes adequate provision to meet the needs of gypsies and travellers and travelling showpeople.**

213. At the time the Plan was submitted for examination the most up-to-date evidence relating to gypsies and travellers and travelling showpeople was a Needs Assessment completed in 2011. The government published a revised Planning Policy for Travellers in August 2015 (PPTS 2015) which amended the definition of gypsy and traveller to exclude those who have ceased travelling.

214. A new Gypsy and Traveller Accommodation Assessment (GTAA) was commissioned by the Cambridgeshire Authorities together with Kings Lynn and West Norfolk, Peterborough and West Suffolk. This assessment (RD/Strat/221) (GTAA 2016) identified only two gypsy or traveller households in the City, neither of whom had any current or future accommodation needs. No travelling showpeople households were identified in the City. The Plan therefore makes no provision for new pitches or plots.

215. Policy 49 is a criteria based policy against which any applications for gypsy and traveller pitches can be considered. The policy also indicates that if a need is identified in the future, opportunities to meet that need will be sought as part of significant major development sites. As discussed above there are a number of major development sites, originally allocated in the 2006 Local Plan, which are coming forward for development. We find no convincing reasons why such sites should not be considered suitable for the provision of pitches for gypsies and travellers. Consideration of the particular circumstances of individual sites can be taken into account through the masterplanning and planning application processes. **C147 - C151** are necessary to ensure that the policy reflects the outcome of the GTAA 2016 and national policy in PPTS 2015 and in the NPPF, and is consistent with the approach in the emerging South Cambridgeshire Local Plan in relation to cross-boundary sites.

216. Section 124 of the Housing and Planning Act 2016 amended section 8 of the Housing Act 1985 which now requires each local housing authority in England to consider the needs of people residing in or resorting to their district with respect to the provision of: (a) sites on which caravans can be stationed, or (b) places on inland waterways where houseboats can be moored. At the time this matter was considered at the examination, the Council advised that it had not carried out the assessment required under the Housing Act 1985 (as amended). Issues related to houseboat moorings are covered elsewhere in this report. The evidence available from the GTAA (2016) suggests that demand for caravan sites within the City will not be significant. In the circumstances we find that the Plan is sound in relation to this issue.

217. Once the assessment of the needs of people requiring sites on which caravans can be stationed and places where houseboats can be moored, has been

completed, it may be necessary to review Policy 49 which can be done as part of the wider review of the Plan (see Issue 16 below).

### **Issue 14 – Whether the Plan makes adequate provision for new transport and related infrastructure**

#### *Transport*

218. Policy 5 of the Plan provides a strategic framework linking the Local Plan to the Cambridgeshire LTP and the TSCSC. Policy 80 seeks to support sustainable access to development by walking, cycling and public transport. The Plan includes an indicative route for the Chisholm Trail a proposed new cycle route running broadly north-south to the east of the City centre. We are satisfied that any potential conflict between the infrastructure needed for the Trail and the City's heritage and natural assets can be mitigated through the development management process.

219. Section 9 of the Plan also contains policies relating to car parking, aviation development, telecommunications and infrastructure delivery through CIL and planning obligations. **C207 – 209** are necessary for clarity. **C210** clarifies the relationship with CIL.

220. Appendix L sets out requirements for car and cycle parking. The use of cycles as a mode of transport is significant in Cambridge. **C262 - 269** are necessary to ensure that cycle parking is available and usable in both residential and other developments and that the Plan is effective in relation to this issue.

#### *Conclusions*

221. Where necessary the Areas of Major Change identify specific infrastructure requirements. Taken together with the generic policies relating to transport and other infrastructure provision we consider that the Plan makes adequate provision for new infrastructure to support development.

### **Issue 15 – Does the Plan include an adequate framework for monitoring the implementation of its policies?**

222. Appendix M of the Plan deals with Monitoring and Implementation. The Appendix lists a range of issues to be monitored on a policy by policy basis. It lacks precision in terms of trigger points and action to be taken. The latter is often expressed as seek further engagement with developers, agents and landowners. **C270** sets out a new Appendix M which includes greater precision in relation to trigger points, although the action to be taken, in some cases, remains vague. Despite these shortcomings we find that it will nonetheless be effective and it is a matter that can be addressed through the early review of the Plan (see Issue 16 below).

### **Issue 16 – Should a commitment to an early review of the Plan be included in the Plan**

223. There are a number of issues outlined in this report where our conclusion that the Plan can be found sound depends, to some extent, on an early review of the Plan. The Council has indicated that the preparation of a joint plan with South Cambridgeshire District Council is a requirement of the Greater



Cambridge City Deal. The preparation of a joint plan is an opportunity to review the Local Plans of both areas.

224. The Council's proposed **C028** sets a timetable for the submission of the joint local plan for examination by the end of the summer 2022. This timetable has been set to allow for two stages of consultation, at Regulation 18 and 19. Bearing in mind the level of public interest in this Plan and the emerging South Cambridgeshire Local Plan which led to a large number of representations being received, we consider that the proposed timescale is reasonable.
225. The Council does not have sole control of the adoption date because of the examination process and it would not be reasonable, in this case, to specify an adoption date. Nor should the policy seek to identify every area of the Plan that will need review. That will be a matter for judgement in the light of local circumstances, including the non-statutory spatial plan that is being prepared for the Cambridgeshire and Peterborough Combined Authority, and national policy, including the revised NPPF which is the subject of consultation at the time of writing this report.
226. In the event that the joint plan is not prepared within the anticipated timescale, the weight to be attached to the policies of this plan in the development management process will be a matter for the decision maker, having regard to national policy.

### *Conclusion*

227. In the light of the concerns identified elsewhere in our report, we conclude that it is necessary to include a commitment to an early review of the Plan, and that the policy outlined in **C028** is an appropriate way to achieve that without prejudging what the content of the joint Local Plan or its evidence base should address.

## **Assessment of Legal Compliance**

228. Our examination of the legal compliance of the Plan is summarised below.
229. The Cambridge Local Plan 2014 has been prepared broadly in accordance with the Council's Local Development Scheme, which was updated in 2015. The adoption date for the Plan will be later than anticipated in the LDS but this is because of the time taken to complete the examination which is not a factor within the Council's control.
230. Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
231. Sustainability Appraisal has been carried out and is adequate. The concerns expressed in our preliminary conclusion have been resolved through the SA Addendum 2015, which appraises sites on the edge of Cambridge. SA of the main modifications has also been carried out. Some representors have argued that not all reasonable alternatives have been subject to sustainability appraisal. However, the Council can exercise its discretion in deciding what

the reasonable alternatives may be and we are satisfied that it has exercised that discretion in a reasonable way.

232. The Habitats Regulations Appropriate Assessment Screening Reports (2013, as updated in 2016) set out why an AA is not necessary and Natural England supports this. Following the judgement by the Court of Justice of the European Union in the case of People over Wind, Peter Sweetman v Coillte Teoranta the HRA screening process was reviewed in 2018 for the Council. The review (RD/EX/160) concluded that the conclusions of the previous HRA screening reports remain valid.
233. The Local Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. See in particular issue 12 above.
234. **C211** corrects the reference to the Cambridgeshire and Peterborough Minerals and Waste Development Plan Documents and clarifies the relationship between this Plan and the Cambridge East AAP. Subject to the inclusion of this MM, the Cambridge Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

## **Overall Conclusion and Recommendation**

235. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
236. The Council has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that with the recommended main modifications set out in Appendix 1, the Cambridge Local Plan 2014 satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Laura Graham*

Inspector

*Alan Wood*

Inspector

This report is accompanied by an Appendix containing the Main Modifications.