Homes Topic Paper



Greater Cambridge Local Plan

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1. Introduction and purpose

- 1.1 This is one of nine topic papers produced to inform the Draft Plan consultation on the Greater Cambridge Local Plan. The topic papers are:
 - Strategy
 - Sites
 - Climate Change
 - Green Infrastructure
 - Wellbeing and Social
 - Great Places
 - Jobs
 - Homes
 - Infrastructure
- 1.2 All of the papers can be found on the Greater Cambridge Shared Planning website.
- 1.3 The topic papers set out how each policy under the relevant Local Plan 'Theme' has been developed. As such, the topic papers support and complement the Draft Plan consultation document as they provide a detailed explanation of the basis for each draft policy.
- 1.4 The Topic Papers build on those published as part of the First Proposals Consultation. They provide background on the early development of the policies. These are still available to view in our document library.
- 1.5 The policies are presented in a consistent format in each paper with sufficient information to provide a comprehensive appreciation of the background to and development of the Policy.
- 1.6 The content and structure for each policy option is:
 - The issue the plan is seeking to respond to
 - How was the issue covered in the First Proposals consultation?
 - Policy Context update

- Summary of issues arising from First Proposals representations
- New or updated evidence
- Additional alternative approaches considered
- Response to Main Issues Raised in Representations
- Further work and next steps
- 1.7 The local plan is supported by a wide range of evidence which can be found in our document library. Key supporting documents to the plan include:
 - Statement of Consultation
 - Sustainability Appraisal
 - Habitats Regulations Assessment
 - Equalities Impact Assessment (EQIA)

2. Homes chapter

Introduction

- 2.1 As part of the First Conversation consultation in 2019 we set out our approach to ensuring that meeting our housing needs would be at the heart of the new local plan.
- 2.2 The First Proposals consultation in 2021 identified how housing had influenced the emerging strategy, and proposed a series of development management policies which would ensure development helps meet our housing needs.
- 2.3 A number of comments were received on the general approach to the theme. Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

Summary of the main issues raised in general comments on the homes theme

2.4 There is general support for the proposed housing policies from some Parish Councils, Cambourne Town Council and some site promoters. General comments on the homes chapter include support for the Local Plan requiring a wide range of housing – type, size and tenure - as this will improve the ability of the market to achieve enhanced levels of delivery and will support the creation of diverse communities. Specific comments suggest the need for family homes with gardens within the city and the need to reuse vacant buildings to minimise whole life carbon emissions. Parish Councils suggest that there is a need to prevent building of new homes while others remain empty, and the need to protect new homes from being lost to buy to let. Metro Property Unit Trust asks for the housing policies to recognise the importance of purpose-built student accommodation, as this reduces the demand on the existing and proposed housing stock. Great Shelford PC highlight that homes do not make a community, and that they need to be supported by infrastructure.

Response to the main issues raised in representations

- 2.5 Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.
- 2.6 The Councils' response to these matters includes:
 - Noting support for address a range of housing issues in the emerging plan.
 - Both Council's acknowledge that bringing vacant homes back into use is an important issue. Making the best use of existing homes in Cambridge is one of the key objectives in our Housing Strategy. Empty homes make up less than 1% of the housing stock.
 - The draft plan identifies a range of specialist housing needs, including student accommodation.
 - The draft plan is informed by an Infrastructure Delivery Plan, and includes
 policies that seek to ensure infrastructure responds to the need generated
 by new developments.

Homes policies

- 2.7 The following proposed policies areas are addressed in this topic paper:
 - H/AH: Affordable housing
 - H/ES: Exception sites for affordable housing
 - H/HM: Housing mix
 - H/GL: Garden land and subdivision of existing plots
 - H/SS: Residential space standards and accessible homes
 - H/SH: Specialist housing
 - H/CB: Self and custom build homes
 - H/BR: Built to rent homes
 - H/CO: Co-living
 - H/MO: Houses in multiple occupation (HMOs)
 - H/SA: Student accommodation
 - H/DC: Dwellings in the countryside
 - H/RM: Residential moorings

- H/GT: Gypsy and traveller pitches and travelling showpeople plots
- 2.8 Policies are no longer proposed for the issues below, and this topic paper provides an explanation for this approach:

H/CH: Community led housing

• H/RC: Residential caravans



3. Policy H/AH: Affordable housing

Issue the plan is seeking to respond to

3.1 There is a high level of need for affordable housing in Greater Cambridge, across different types of household and household incomes. We therefore need to deliver affordable homes on new developments that meet the varied needs of our communities.

How the issue was covered in the First Proposals consultation

- 3.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/AH: Affordable housing
- 3.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:
 Homes Topic Paper

Policy context update

National Planning Policy Framework (NPPF, December 2024)

- 3.4 The new NPPF includes a number of changes to chapter 5 'Delivering a sufficient supply of homes' that relate to the delivery of affordable housing:
 - adds that planning policies must set out the minimum proportion of social rented homes required (paragraph 64),
 - deletes the requirement for at least 10% of the homes to be for affordable homeownership, and adds that the tenure mix should meet identified local needs (paragraph 66),
 - adds that as part of the 'Golden Rules' of Green Belt developments, on major developments for housing the proportion of affordable housing should be higher than that which would apply to major developments outside of the Green Belt and at least 50% of the homes should be affordable, unless this would make the development of these sites unviable (paragraph 67),

- adds that local planning authorities should support mixed tenure sites through their planning policies (paragraph 71), and
- deletes the requirement to deliver a minimum of 25% of affordable housing as First Homes, but continues to allow for First Homes to be delivered where they meet local need (footnote 31).

Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and Annexes 1-8

- 3.5 The Greater Cambridge Housing Strategy 2024-2029 highlights the affordability challenge Greater Cambridge is an expensive place to buy or rent a home, and for those on low incomes the housing options are scarce. There is also a growing affordability gap where middle income households are being squeezed out of the market, with limited options for home ownership or in the private rented sector. Delivery of affordable housing therefore aims to provide options for those who would struggle to afford to rent or buy locally on the open market. The Councils aim to ensure that appropriate levels of affordable housing come forward on new developments, and that the affordable housing provided consists of a mixture of sizes, types and tenures, and is as affordable as possible for local people. It sets out that the Councils will generally prioritise delivery of social housing for rent, but also seek to expand the delivery of 'intermediate' affordable housing tenures where there is clear evidence that it will meet local needs.
- 3.6 The Housing Strategy sets out that the Councils will seek the following proportions of different tenures of affordable homes:
 - 75% affordable housing for rent (social rent homes and / or affordable rent homes), and
 - 25% shared ownership that is sufficiently affordable to meet local needs (or other tenures considered on a case-by-case basis).
 - On developments of 15 dwellings or more, at least 10% (of the 75%) to be for social rent homes.

- 3.7 The Housing Strategy seeks to maximise the number of bedspaces per affordable or social rent dwelling by setting a minimum number of bedspaces for each dwelling size (number of bedrooms), so that affordable housing for rent homes are designed to accommodate different family compositions and align with the Councils' Lettings Policies and Local Housing Allowance criteria.
- 3.8 The Councils expect all affordable housing (other than Affordable Private Rent as part of Build to Rent schemes) to be brought forward by Registered Providers, and to remain available as affordable housing for future eligible households. Where properties are sold, it is expected that as much as possible of the capital receipts received will be reinvested into affordable housing in the Greater Cambridge area, to meet the high levels of need identified locally.
- 3.9 The Housing Strategy sets out how any affordable homes should be clustered and distributed in relation to other tenures on any new developments, and how sizes and types of affordable homes should be grouped together.

Summary of issues arising from First Proposals representations

3.10 There is support for the policy direction from many developers whilst parish councils, community groups and individuals want the policy to go further by providing homes that are more affordable, more secure and are run by community groups or local authorities. There are also calls for affordable housing to be targeted at local people, older people and key workers and for a broader range of affordable tenures including low cost home ownership. Parish councils, community groups and individuals want to see the 40% requirement strictly enforced whilst developers call for flexibility based on robust viability assessments and review mechanisms which also cater for specific needs of schemes such as Extra Care schemes which cannot compete with market housing. They also highlight exemptions set out in the NPPF. There are disagreements over clustering with parish councils wanting affordable housing spread across developments but developers calling for some flexibility to match Registered Provider preferences. Developers argue that allocating more small

sites will deliver more affordable housing more quickly than relying on strategic sites with their significant infrastructure overheads.

3.11 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Diamond Affordability Analysis 2022 (published July 2023)

- 3.12 This study uses a range of data to create a series of tables and diagrams that help visualise how the housing market works across Cambridgeshire, Peterborough and West Suffolk. The centre piece is a 'diamond-o-gram', which shows the number and percentage of households in different income groups and compares these against average housing costs across a range of tenures and sizes of homes.
- 3.13 The study highlights that within the study area, Cambridge has the highest housing costs for almost all tenures and sizes of homes, with South Cambridgeshire a close second.
- 3.14 The study also highlights that within Greater Cambridge:
 - 33% of households have an income of less than £30,000, 28% of households have an income of £30,000 to £50,000, and 39% of households have an income of over £50,000,
 - there is a reasonable supply of affordable and social rented homes at 16% of all dwellings, but that market home ownership dominates supply making up 61% of all dwellings,
 - smaller affordable and social rented homes are an option for households
 with incomes of £15,000 to £20,000, but larger affordable and social rented
 homes can need household incomes of up to £35,000 when it is assumed
 that 35% of household incomes are spent on housing costs,

- private rented and shared ownership options require household incomes of at least £25,000 to £30,000, but larger private rented homes may be more affordable than larger shared ownership homes,
- intermediate rented homes (at around 80% of median private rents) would be a useful addition to housing supply as they require a lower income than shared ownership, and provide flexibility for households as they do not require the same longer-term commitment as a home purchase. Similarly, shared ownership provides an alternative to open market ownership with lower deposits and the flexibility to allow owners to increase their ownership share over time,
- the household income (when it is assumed that 35% of household incomes are spent on housing costs) required for open market ownership or shared ownership range widely, from £25,000 to £85,000 depending on the size and location of the home, and
- new build homes for sale on the open market home require the highest household incomes for all dwelling sizes, with a household income of at least £45,000 to £50,000 needed (when it is assumed that 35% of household incomes are spent on housing costs).

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

3.15 The Housing Needs of Specific Groups Update provides an assessment of the need for affordable housing in Greater Cambridge, following the methodology set out in national planning practice guidance. It looks at the need from households unable to buy or rent privately, and also, from households able to rent privately but not buy, by considering local house prices and rents, income levels and affordability, need from homeless, overcrowded, concealed or new households, and existing supply and relets. The update concludes that there is a net need for 928 dwellings per annum in Cambridge and 708 dwellings per annum in South Cambridgeshire. The update highlights that of this, 614 dwellings per annum in Cambridge and 469 dwellings per annum in South Cambridgeshire are from those unable to buy or privately rent.

- 3.16 The update outlines that the relationship between affordable housing need and overall housing need is complex, and therefore that the two assessments should not be arithmetically linked. For example, some of the affordable housing need will already be in accommodation (e.g. existing households falling into need), and therefore are not requiring an additional dwelling, just a different tenure of dwelling. Regardless, the analysis identifies an acute need for affordable housing. The update recommends that affordable housing delivery should be maximised where opportunities arise, but that ultimately the amount of affordable housing delivered will be limited to the amount that can viably be provided.
- 3.17 The update sets out that the analysis undertaken points to a clear need for rented affordable housing, rather than affordable home ownership. It also sets out that there is a need for both social and affordable rent housing, but that social rent homes should be prioritised where delivery of them does not prejudice the overall delivery of affordable homes. The update highlights that given the cost of housing locally, it seems very difficult for affordable home ownership products to be provided and be considered as 'genuinely affordable'.
- 3.18 The update sets out that in deciding what types of affordable housing to provide, including a split between rented and home ownership affordable housing products, the Councils will need to consider the relative levels of need and also viability issues. For example, providing affordable home ownership may be more viable and may therefore allow more units to be delivered, but at the same time households with a need for rented housing are likely to have more acute needs and fewer housing options.

Viability Assessment (2025)

3.19 The draft Local Plan has been subject to a whole plan viability assessment.

This identifies that it is viable to seek 40% affordable housing from all major developments for housing (irrespective of their use class of C2, C3, C4 or sui

generis), including student housing, specialist accommodation, Build to Rent and Co-living.

Additional alternative approaches considered

3.20 No additional alternative approaches identified.

Draft policy and reasons

- 3.21 The draft policy can be viewed in the Local Plan.
- 3.22 National planning policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, and reflect the results of this assessment in their planning policies. The Councils have evidence that there is high level of need for affordable housing in Greater Cambridge, and it is important we seek a significant contribution from developments to respond to this need. Seeking high levels of affordable housing by securing at least 40% affordable homes on major development sites and at least 50% affordable homes on land within the Green Belt, and by enabling the provision of affordable housing on rural exception sites (see Policy H/ES), will make a significant contribution towards responding to our identified affordable housing needs.
- 3.23 The draft policy takes account of national planning policy and guidance, whilst seeking to maximise the supply of new affordable housing. Evidence demonstrates it is viable to seek 40% affordable homes on major development sites and 50% affordable homes on land within the Green Belt, but that a higher percentage will impact on the viability and delivery of sites.
- 3.24 All major developments for housing must provide on-site affordable housing or in specific circumstances either a financial contribution to enable delivery of affordable housing elsewhere or linked off-site provision, and it is important that new major developments for housing are not artificially divided up into smaller

developments to avoid providing affordable housing. The evidence demonstrates that it is viable for any major developments for housing (irrespective of their use class of C2, C3, C4 or sui generis) to provide affordable housing or a financial contribution, and this is necessary to ensure that there are affordable homes available through a variety of tenures and in a mix of communities and locations.

- 3.25 Cambridge and South Cambridgeshire have been identified by the Government as areas of high affordability pressure, and it is therefore important that the Councils prioritise the delivery of affordable housing for rent. The draft policy seeks to provide an affordable housing tenure mix that will meet a wide range of housing needs and create mixed and balanced communities. The proportions of different tenures of affordable homes also recognises that affordable homes that provide a route to home ownership (such as shared ownership homes) may be required to support the delivery of affordable housing for rent through cross subsidy, and therefore enable developments to be viable and deliverable.
- 3.26 Co-living developments and student accommodation could be provided on sites that are equally suitable for other types of housing, and these other types of housing would be required to provide affordable housing. Therefore, it is important that co-living developments and student accommodation contribute towards meeting our affordable housing need. For Co-living developments, as they are likely to be delivered as a form of Build to Rent, it is appropriate to seek the affordable units on-site and that they are provided following the same principles as Affordable Private Rent homes. For student accommodation, the provision of affordable housing on-site is unlikely to be achievable due to management issues, and therefore a financial contribution is being sought that is comparable to the on-site delivery of affordable housing within other residential schemes.

- 3.27 The thresholds at which affordable housing must be provided on any Co-living or student accommodation developments are in line with national planning policy, which allows for affordable housing to be sought on any major developments for housing i.e. 10 or more dwellings. The number of Co-living units and student bedrooms should be converted to a dwelling equivalent using the ratio for either other communal accommodation or student accommodation set out within the Housing Delivery Test rulebook. This is currently 1.9 units to one dwelling for other communal accommodation (which will be used for Coliving developments) and 2.4 bedrooms to one dwelling for student accommodation.
- 3.28 It is important that affordable housing for rent homes are designed to accommodate different family compositions and therefore allow the Councils to house as many people as possible from their housing registers. Therefore, the number of bedspaces as well as the number of bedrooms needs to be considered when designing these homes.
- 3.29 To achieve mixed, balanced and well-integrated communities, it is important that different housing tenures and unit sizes are distributed throughout a development and the local area, and that homes are designed to be tenure blind. This helps with ease of management and any service charges, but also prevents similar household types from being grouped together which may cause, for example, areas of high child density, groups of residents with similar economic backgrounds or with high support needs.
- 3.30 Local Lettings Plans set out guidelines and/or criteria to govern which households can be allocated affordable rent or social rent homes on a specific development, and can therefore be used to enable the creation of balanced and mixed communities or to prioritise affordable housing for local workers or for specific groups of people.

Response to main issues raised in representations

- 3.31 There is an acute need for affordable housing in Greater Cambridge, and therefore seeking high levels of affordable housing on major developments for housing will make a significant contribution towards responding to our identified affordable housing needs. At least 40% affordable homes on major developments (including Built to Rent developments) and at least 50% affordable homes on Green Belt developments have been demonstrated to be deliverable through whole plan viability testing. National planning policy only allows affordable homes to be sought on major developments for housing, and therefore the policy reflects this, however, developers or Registered Providers can choose to deliver affordable homes on smaller developments or through the delivery of rural exception sites for affordable housing (see Policy H/ES). The draft policy takes account of the changes to national planning policy and guidance in relation to the provision of affordable housing that have been published since First Proposals, including the removal of the specific requirement for 25% of the affordable homes to be First Homes.
- 3.32 Cambridge and South Cambridgeshire have been identified as areas of high affordability pressure, and it is therefore important that the delivery of affordable housing for rent is prioritised, whilst also recognising that other affordable tenures may be required to support the delivery of affordable housing for rent through cross subsidy. The draft policy seeks an affordable housing tenure mix that will meet a wide range of housing needs and create mixed and balanced communities, whilst also taking account of viability. The Local Plan as a whole seeks to deliver truly affordable housing by requiring the provision of affordable housing on new major developments, but also by combining this with directing new homes to the most sustainable locations within Greater Cambridge where there is access to public transport or services and facilities within walking or cycling distance, and by requiring all new homes to be designed to meet the highest achievable standards for water and energy use therefore reducing utility bills.

- 3.33 National planning policy makes clear that planning applications that comply with up-to-date policies should be assumed to be viable. However, national planning policy and guidance does allow for applicants to demonstrate through a viability assessment that in their particular circumstances that if some or all of the development requirements are imposed then the development is unviable. National planning policy and guidance have not been replicated in this policy as Local Plans should avoid unnecessary duplication with policies in the NPPF. No specific details have been provided on which costs may have been underestimated, however, the Viability Assessment to support the Greater Cambridge Local Plan has been prepared taking account of statutory requirements, guidance and best practice, and it considers a range of development scenarios and residential typologies. The Viability Assessment has specifically considered the delivery of affordable housing on specialist housing developments, such as for older people, and has concluded that it is viable to seek similar levels of affordable provision as with other homes.
- 3.34 National statutory and/or regulatory requirements apply such that no affordable homes can be protected in perpetuity, however any capital receipts received from the sale of an affordable home are reinvested into affordable housing in Greater Cambridge. Local Lettings Plans will be used where appropriate to prioritise affordable rent and social rent housing for local workers or specific groups of people. The mix of houses and flats on a new development is the result of its design, and is influenced by its location and the character of its surroundings specific requirements are set out in Policy H/HM. To create mixed and balanced communities the policy requires new affordable homes to be dispersed in small groups or clusters throughout the development, and the policy allows some flexibility to reflect site specific circumstances. The policy does not preclude the delivery of modular pod affordable homes to meet the needs of those that are homeless.
- 3.35 A variety of sites have been considered through the Housing and Economic

 Land Availability Assessment process and assessed against the development

 strategy for the Local Plan, and those sites identified as suitable and

deliverable within the plan period have been allocated. Having considered a range of alternative strategies, the proposed development strategy focusses site allocations for new homes and jobs to the most sustainable locations of Cambridge urban area, the edge of Cambridge and the new settlements as these have: the least climate impact, active and public transport as the natural choice, and jobs, services and facilities near to where people live. Affordable homes will also continue to be delivered on windfall sites and through rural exception sites for affordable housing.

Further work and next steps

3.36 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

4. Policy H/ES: Exception sites for affordable housing

Issue the plan is seeking to respond to

4.1 There is significant need for affordable housing in rural Greater Cambridge. House prices are high and the stock of affordable housing is falling in many villages. Homes being lost through the Right To Buy are not necessarily being replaced by new stock in the same village as national policy requires that "provision of affordable housing should not be sought for residential developments that are not major developments" (NPPF 2024 – paragraph 65). This often means that those with strong connections to a village are forced to move outside of the area which can have a detrimental effect on the sustainability of village life.

How the issue was covered in the First Proposals consultation

- 4.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/ES: Exception sites for affordable housing
- 4.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

 Homes Topic Paper

Policy context update

National Planning Policy Framework (NPPF, December 2024)

4.4 The new NPPF includes a number of changes that relate to the delivery of affordable housing. These are discussed under Policy H/AH: Affordable housing. There are no specific changes to rural exception sites and First Homes exception sites.

<u>Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and</u> Annexes 1-8

- 4.5 The Greater Cambridge Housing Strategy 2024-2029 (Annex 2) provides an additional policy position to complement the Local Plan policy. It sets out the following expectations for rural exception sites:
 - Where there are groups of smaller settlements, development in one village may support services in a village nearby and meet housing need within a wider catchment area;
 - Rural exception sites should be supported by an up to date housing needs assessment which identifies the numbers, types and tenures of homes needed to meet local housing need;
 - Rural exception sites should be led by Registered Providers working in partnership with the Rural Housing Enabler (based at Cambridgeshire ACRE), the parish council and the developer;
 - Pre-application discussions should precede the submission of a planning application, which should be a full application rather than an outline planning application, and the relevant Registered Provider must be party to the section 106 agreement;
 - The number of affordable homes provided on a rural exception site should not be greater than the level of local need identified. Additionally, the proposed scheme should be proportionate to the scale of the adjoining village taking into account the category of village, the size and character of the built-up area of the village and the level of services and facilities available in the village;
 - The impact of the proposed development on village character and the rural landscape will be key considerations in determining any planning application;
 - Where rural exception sites are within or adjoin the Green Belt the applicant must demonstrate by way of a sequential test that no alternative appropriate sites can be found outside of the Green Belt; and
 - Proposals to extend rural exception sites will be considered on their merits,
 having regard to the overall scale of the site that would be created together

with the original development and the cumulative visual impact as a result of a larger development in the countryside.

4.6 The housing strategy also makes clear that South Cambridgeshire District Council's preference will always be to support a rural exception site scheme (over a First Homes exception site scheme) as they address identified local needs. Developers will need to demonstrate why a First Homes exception site would be more appropriate than a rural exception site. All affordable homes on a First Homes exception site will prioritise local need although it is accepted that many will ultimately be sold to people from further afield.

Greater Cambridge – A First Homes Interim Position Statement (March 2022)

The First Homes Interim Position Statement was introduced in light of the introduction of First Homes through a Written Ministerial Statement and planning practice guidance, and ahead of the Local Plan setting out a policy position. The Interim Position Statement specifically applies when a development proposal comes forward which includes reference to First Homes as part of its affordable housing provision. It sets out that national criteria for First Homes exception sites have largely been adopted without amendment. However, some additional local criteria have been introduced as there is a preference to support rural exception sites. An applicant must demonstrate that the availability of First Homes or other affordable home ownership tenures is insufficient within the village of the proposed development to cater for the needs of first-time buyers. In terms of scale, First Homes exception sites should generally be no larger than a typical rural exception site of between 10 – 20 homes, bearing in mind that they are likely to be all one tenure and smaller homes. For First Homes exception sites within South Cambridgeshire, a village connection will be applied for the first 4 weeks to give priority to local people, which is in addition to local connection criteria at the district level that are applied for a 3 month period.

Neighbourhood plans

4.8 Since the First Proposals were published a number of Neighbourhood Plans in South Cambridgeshire have either been made (adopted) or have made significant progress to becoming made. A number of these have introduced exception site policies designed to add local context to the current South Cambridgeshire Local Plan rural exception site policy by adding more specific parish or village level criteria. Their common denominator is their support for the exception site policy approach to meeting local housing needs.

Summary of issues arising from First Proposals representations

- 4.9 There was general support for the policy with parish councils and individuals seeking stronger controls whilst developers prefer a more flexible approach. The stronger controls suggested include: the requirement for local community support and/or leadership; robust evidence of local need; stricter criteria particularly in the green belt; local connection policies; no market housing; and prioritising the most sustainable communities and community led housing initiatives. Those arguing for more flexibility suggested: prioritising key workers alongside local people; allowing schemes in the green belt and across all types of villages; and a more positive approach to market housing.
- 4.10 There was some concern that rural exception schemes could be used as a trojan horse to enable larger schemes or schemes on unsuitable sites to come forward. However, it was also suggested that rejected larger/unsuitable sites should be considered for rural exception schemes.
- 4.11 There was a preference for rural exception sites to be prioritised over First Homes exceptions sites with Green Belt controls seen as a key tool for achieving this.

New or updated evidence base

Census of Population 2021

4.12 The 2021 Census of Population has been published since the First Proposals was released. This includes a vast range of data for rural communities. Of particular relevance to this policy is the data highlighting generally low levels of affordable housing at parish level. In England, 17.1% of households live in rented affordable housing. In Cambridge this figure is higher (22.7%) but in South Cambridgeshire it is lower (14.5%). Across South Cambridgeshire's 104 parishes, 35 have 10% or fewer households living in affordable rented accommodation and 11 of these have 5% or fewer households living in affordable rented accommodation.

Greater Cambridge Shared Planning Service monitoring data

4.13 There have been 434 affordable homes completed on rural exception and First Homes exceptions sites over the period 2011-2024 in South Cambridgeshire. More recently there have been 55 affordable homes completed on exception sites over the period 2021-2024 including the area's first, and to date only, First Homes exception site. The delivery of rural exception sites has fallen in recent years.

South Cambridgeshire District Council Housing Register

4.14 As at March 2025 for 99 out of 104 parishes, there was at least one household on the South Cambridgeshire District Council Housing Register with a local connection. There were at least 5 households on the register in 84 parishes. Actual need is likely to be even higher than the numbers on the register suggest.

Additional alternative approaches considered

4.15 No additional alternative approaches identified.

Draft policy and reasons

4.16 The draft policy can be viewed in the Local Plan.

- 4.17 There is a shortage of affordable housing in Greater Cambridge which is particularly acute in rural communities. The stock of affordable housing in rural communities continues to be affected by Right To Buy sales and national planning policy requires that no affordable housing is sought on non-major developments which account for the majority of residential developments in many villages. The Housing Board's latest Housing Market Bulletin (Edition 63, December 2024) showed that the lower quartile house price to income ratio in South Cambridgeshire was 11.3 in September 2024 compared with 9.4 for the East of England as a whole.
- 4.18 The draft policy approach seeks to retain an element of affordable housing in rural communities so that people with a connection to a village can stay in, or return to, a community where they have deep seated roots. In order to have a qualifying local connection to be eligible to apply for an affordable home on a rural exception scheme in South Cambridgeshire applicants must have:
 - worked (been in paid employment) in the village for the last 12 months for 16 hours or more per week,
 - lived in the village for at least 5 years out of the last 8 years,
 - family members who are living in the village and have lived there for a
 period of 5 years or more. This could be a parent, (adult) child or a sibling.
 Other close family ties are considered in agreement with the Council on a
 case by case basis, or
 - special circumstances that the council considers give rise to a local connection.
- 4.19 A cascade system is used whereby priority is given to households meeting the local connection criteria for the village or parish concerned. If all properties are not let or sold at this point the cascade next prioritises households with a connection to neighbouring parishes. Only if this stage fails to let or sell all properties will they be available to households elsewhere within the district. However, the local connection priority is written into the s106 agreement and is used every time a dwelling becomes vacant.

- 4.20 Rural exception schemes have been delivered successfully in South Cambridgeshire over several decades and there are currently more than 50 such schemes in the district. The draft rural exception site policy therefore proposes to continue the basic policy approach that has been used for many years. Past experience suggests that rural exception site schemes should be led by a Registered Provider in conjunction with the developer/landowner, parish council and Rural Housing Enabler. Proposals should be based on an independent local housing needs survey or assessment that clearly articulates the scale and nature of housing need. Over development and the resulting failure to allocate all properties to households with a local connection can have damaging reputational impacts and make it harder to get community buy in for future rural exception schemes.
- 4.21 Strong community buy in to previous schemes has led to some villages having two or even three rural exception schemes. Sometimes these are completely separate and sometimes they are in the form of extensions. Proposals to extend rural exception sites will be considered on their merits, having regard to the overall scale of the site that would be created together with the original development and the cumulative visual impact as a result of a larger development in the countryside.
- 4.22 It is important that rural exception schemes are based on exception site land values in order to be viable. There is a consensus across the Cambridgeshire Rural Affordable Housing Partnership (a consortium of local authorities, registered providers and Cambridgeshire ACRE) that, at 2025 prices, exception site land values are £10,000 to £15,000 per plot.
- 4.23 The government introduced First Homes and First Homes exception sites into national planning policy in 2021 through a <u>Written Ministerial Statement</u> and <u>Planning Practice Guidance</u>. Government policy is clearly supportive of First Homes exception sites. However, it gives considerable discretion to local

authorities to set out the criteria against which these should be assessed at the local scale. One issue where there is no discretion is that First Homes exception sites are not permissible in the Green Belt.

- 4.24 Paragraph 026 of the Planning Practice Guidance states "For plan making, local authorities and neighbourhood planning qualifying bodies are encouraged to set policies which specify their approach to determining the proportionality of First Homes exception site proposals, and the sorts of evidence that they might need in order to properly assess this".
- 4.25 Paragraph 027 of the Planning Practice Guidance states "local authorities and neighbourhood planning groups can set policies that specify in further detail the proportions of market housing would be considered acceptable, and under what circumstances".
- 4.26 The draft policy recognises that First Homes exception sites can play a complementary role to rural exception sites in delivering affordable housing in Greater Cambridge. However, it is important that they do not crowd out rural exception sites. The Greater Cambridge Housing Strategy 2024-2029 makes it clear that rural exception sites will always be South Cambridgeshire District Council's preference (to First Homes exception sites) as they meet a specified local need. First Homes exception sites will be encouraged to include a wider range of affordable housing options in line with their needs assessment and priority will be given to households with a local connection to the settlement concerned for all affordable tenures. First Homes on First Homes exception sites will be prioritised for people with a connection to the local village during the first 4 weeks of marketing.
- 4.27 A developer bringing forward a First Homes exception site proposal must evidence why the proposal is more appropriate than a rural exception scheme. It is unlikely that a First Homes exception site would be considered more appropriate in a Group Village or Infill Village as need is likely to be low and a

more locally tailored approach would be favourable. First Homes exception sites are likely to comprise 1 and 2 bedroom homes as the national price cap would make larger homes difficult to deliver. Regardless of need, First Homes exception sites must be an appropriate scale in relation to the settlement they adjoin but can be no larger than one hectare or 5% of the size of the existing settlement. The Greater Cambridge First Homes Interim Position Statement states that First Homes exception sites should generally be no larger than a typical rural exception site of between 10 – 20 homes, bearing in mind that they are likely to be all one tenure and smaller homes. It also requires that applicants must demonstrate that the availability of First Homes or other affordable home ownership tenures is insufficient within the village of the proposed development to cater for the needs of first-time buyers. First Homes exception sites should comprise, ideally, wholly affordable tenures. Limited market housing will be considered subject to a viability assessment based on exception site land values.

Response to issues raised in representations

- 4.28 A number of responses called for stronger controls on exception sites. The draft policy approach already included a number of controls to ensure that sites are appropriate in terms of meeting local need and being a suitable scale and design in relation to the adjoining settlement. Some suggestions were already addressed by the draft policy approach while some were considered impractical or contrary to national planning policy.
- 4.29 Robust evidence of local need, local connection criteria and the requirement of a sequential test in the Green Belt have all been used very successfully in rural exception site policy for many years. The most sustainable communities have always been the most likely location of exception schemes as they tend to be bigger and have greater levels of need. They also tend to have better facilities. Community led housing schemes can be delivered through exception sites but they still need to meet the same criteria as other proposals.

- 4.30 The requirement for local community support or leadership is impractical although always welcomed and could be a material consideration in considering proposals given that rural exception schemes should be addressing local need. Failure to garner support could be indicative of issues with the proposal.
- 4.31 Not accepting any market housing would be contrary to national planning policy although the draft policy does seek to minimise market housing to that required for viability purposes.
- 4.32 Developers preferred a more flexible approach to exception sites. The draft policy is considered to be sufficiently flexible to allow affordable housing schemes to be delivered which address identified housing need. It is important that clear constraints are applied to the inclusion of market housing to ensure that exception sites remain focused on their priority. National planning policy is very clear about how exception sites can be used in the Green Belt and there is no scope to flex this (and this approach is supported by many respondents). Key workers are not specifically included in the priority groups for exception sites. However, where they are eligible for affordable housing they will be eligible subject to them meeting other criteria.
- 4.33 The danger of exception sites being used as a loophole to increase delivery of market housing on inappropriate sites is recognised. The draft policy sets out clear criteria for where a small amount of market housing will be considered acceptable. It is important that any viability assessments use exception site land values as their starting point.
- 4.34 It is a sensible suggestion to review sites rejected for allocation through the call for sites process for potential exception sites. However, any forthcoming sites will still need to meet the policy criteria and demonstrate they are suitable for development as rural exception sites or First Homes exception sites. The consideration of sites does not need to be included in the policy.

- 4.35 Some respondents argued that custom and self build plots should not be included within exception sites. However, Greater Cambridge is failing to meet its statutory duty to grant sufficient permissions for custom and self build plots to match demand as measured by the custom and self build register. This has contributed to a number of appeals being lost. Therefore, it seems reasonable to encourage the consideration of custom and self build plots wherever appropriate. If planned correctly there is no reason why custom and self build plots should create additional management or maintenance issues. Neither should they cause viability issues as demand is strong and numbers can be planned to ensure viability remains intact. The policy encourages rather than requires custom and self build plots.
- 4.36 There were calls to prioritise rural exception sites over First Homes exception sites. Rural exception sites have played an important role in supporting rural sustainable communities in South Cambridgeshire for decades. There are more than 50 such schemes in the district enabling people unable to afford market prices to live where they have deep seated roots. Rural exception schemes are considered to make a more valuable contribution to rural communities than First Homes exception sites and will therefore be prioritised.

Further work and next steps

4.37 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

5. Policy H/HM: Housing mix

Issue the plan is seeking to respond to

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

How the issue was covered in the First Proposals consultation

5.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/HM: Housing mix

5.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

National Planning Policy Framework (NPPF, December 2024)

5.4 The NPPF was updated in December 2024. The NPPF continues to highlight that planning policies and decisions should facilitate the delivery of an appropriate mix of housing types and sizes. Paragraph 63 of the National Planning Policy Framework (NPPF, 2024) states that within the context of establishing housing need "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies".

5.5 The NPPF 2024 also sets out that, as part of achieving sustainable development, a sufficient range of homes should be provided to meet the needs of present and future generations.

<u>Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and</u> Annexes 1-8

5.6 The Greater Cambridge Housing Strategy 2024-2029 sets out the strategic direction and priorities for affordable housing development in Greater Cambridge. As

part of the strategy, the Councils aim to ensure that a mix of sizes and types of affordable housing is delivered on the basis of sound and up-to-date evidence. Delivery of an appropriate mix of housing forms part of the Councils' wider aim of supporting mixed and balanced communities across Greater Cambridge.

Summary of issues arising from First Proposals representations

5.7 Support, from Parish Councils and site promoters, for the approach that new developments should have a mix of housing sizes. However, site promoters are seeking more flexibility in the approach to allow for changing market conditions, changing requirements, and site-specific circumstances. Site promoters suggest the policy does not stipulate percentages, includes indicative mix only or the ranges for some housing sizes and tenures are amended, and that each development should determine its own mix. Parish Councils would like policy to address need for provision of bungalows and protection of existing smaller homes. Comments that housing mix should allow for the provision of homes for young single person households. A site promoter objects to the potential to include a planning condition that removes permitted development rights for extensions where that would cause harm to the housing mix. Another site promoter highlights that use class C2 schemes with self-contained dwellings will not always be able to provide the mixes suggested due to their different requirements.

5.8 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

<u>Greater Cambridge AMR 2023 – 2024</u>

5.9 The Greater Cambridge Authority Monitoring Report (AMR) includes data on the housing mix of new homes completed in South Cambridgeshire since 1 April 2011. Table 31 in Appendix 2 of the Greater Cambridge AMR 2023-24 (replicated in Table 1 below) shows that, within South Cambridgeshire, since the 2011/12, in ten out of thirteen of those years, the majority of new homes completed have been 1- or 2-bedroom homes.

Table 1: Housing completions (GROSS) by number of bedrooms (%) in South Cambridgeshire

Period	1 or 2 bedrooms	3 bedrooms	4 or more bedrooms	Unknown bedrooms
2011/12	45%	23%	31%	1%
2012/13	32%	34%	29%	5%
2013/14	41%	26%	28%	5%
2014/15	43%	34%	22%	1%
2015/16	29%	33%	37%	1%
2016/17	35%	34%	30%	1%
2017/18	40%	33%	27%	1%
2018/19	41%	28%	28%	2%
2019/20	39%	32%	29%	1%
2020/21	46%	29%	25%	0%
2021/22	39%	30%	31%	0%
2022/23	41%	32%	26%	0%
2023/24	51%	22%	25%	1%
All Years Total	41%	30%	28%	1%

5.10 Table 38 in Appendix 2 of the Greater Cambridge AMR 2023-2024 (replicated in **Table 2** below) also shows that since the adoption of Policy H/9: Housing Mix in the South Cambridgeshire Local Plan 2018, the following housing mixes have been delivered from market homes completed on sites of 10 or more dwellings:

- in 2022/23 and 2023/24, the majority of dwellings completed were 1- or 2-bedroom dwellings;
- between 2017/18 and 2022/23, at least 30% of dwellings completed were 3bedroom dwellings; and
- between 2017/18 and 2021/22, at least 30% of dwellings completed were 4bedroom dwellings, but this reduced to less than 30% of completions in the past two years.

Table 2: Market housing completions (GROSS) on developments of more than 10 dwellings by number of bedrooms – South Cambridgeshire

Period	1 or 2 bedrooms	3 bedrooms	4 or more bedrooms	Unknown bedrooms
2011/12	33%	31%	36%	0%
2012/13	40%	24%	35%	0%
2013/14	35%	21%	44%	0%
2014/15	26%	33%	40%	1%
2015/16	24%	33%	41%	1%
2016/17	21%	35%	42%	2%
2017/18	28%	31%	41%	0%
2018/19	30%	33%	37%	0%
2019/20	24%	36%	40%	0%
2020/21	36%	35%	30%	0%
2021/22	25%	32%	43%	0%
2022/23	44%	32%	25%	0%
2023/24	54%	22%	24%	1%

5.11 Although not published in the Greater Cambridge AMR, the Councils have data on the housing mix of new homes completed in Cambridge since the 2011/12. It shows that since 2011/12, within Cambridge, the significant majority of new homes completed have been 1- or 2-bedroom homes (see **Table 3**).

Table 3: Housing completions (GROSS) by number of bedrooms (%) in Cambridge

Period	1 or 2 bedrooms	3 bedrooms	4 or more bedrooms	Unknown bedrooms
2011/12	78%	16%	6%	0%
2012/13	66%	23%	12%	0%
2013/14	70%	17%	14%	0%
2014/15	60%	23%	17%	0%
2015/16	58%	23%	18%	0%
2016/17	74%	15%	12%	0%
2017/18	70%	15%	15%	0%
2018/19	75%	12%	13%	0%

Period	1 or 2 bedrooms	3 bedrooms	4 or more bedrooms	Unknown bedrooms
2019/20	80%	11%	9%	0%
2020/21	62%	26%	12%	0%
2021/22	87%	9%	4%	0%
2022/23	86%	8%	6%	0%
2023/24	65%	21%	13%	1%
All Years Total	71%	16%	12%	0%

5.12 The same data (although not published in the Greater Cambridge AMR) can also be analysed to enable a comparison of housing completions by the size and type of dwelling – houses or flats – and tenure (see Tables 4, 5 and 6 below).

Table 4: Housing completions (GROSS) by number of bedrooms for affordable and market tenure types in Greater Cambridge

Number of bedrooms	Affordable Flats	Affordable Houses	Market Flats	Market Houses	Total
1 Bedroom	1587	183	2364	191	4325
2 Bedrooms	2223	1559	3011	1663	8456
3 Bedrooms	58	1335	260	3918	5571
4+ Bedrooms	2	239	7	4520	4768
Unknown	0	0	7	21	28
Total	3870	3316	5649	10313	23148

Table 5: Housing completions (GROSS) by number of bedrooms for affordable and market tenure types in Cambridge

Number of bedrooms	Affordable Flats	Affordable Houses	Market Flats	Market Houses	Total
1 Bedroom	961	4	2044	120	3129
2 Bedrooms	1575	374	2128	332	4409
3 Bedrooms	47	496	244	956	1743
4+ Bedrooms	2	113	6	1057	1178
Unknown	0	0	5	1	6
Total	2585	987	4427	2466	10465

Table 6: Housing completions (GROSS) by number of bedrooms for affordable and market tenure types in South Cambridgeshire

Number of bedrooms	Affordable Flats	Affordable Houses	Market Flats	Market Houses	Total
1 Bedroom	626	179	320	71	1196
2 Bedrooms	648	1185	883	1331	4047
3 Bedrooms	11	839	16	2962	3828
4+ Bedrooms	0	126	1	3463	3590
Unknown	0	0	2	20	22
Total	1285	2329	1222	7847	12683

- 5.13 The data shows that, within Greater Cambridge as a whole, one-bedroom homes tend to be provided as flats, two-bedroom homes also tend to be provided as flats (with over double the number of two-bedroom flats completed in 2011-2024 compared to two-bedroom houses in the same period), and three or more bedroom homes tend to be provided as houses.
- 5.14 However, reviewing the local authority areas individually shows that new homes in Cambridge are predominantly provided as flats, whereas in South Cambridgeshire, new homes are predominantly houses. Similar patterns are also observable in the affordable housing provision, whereby the provision of affordable homes in South Cambridgeshire continues to be more skewed towards affordable houses when compared to delivery figures for Cambridge. This is unsurprising given the urban and rural character of Greater Cambridge, but it illustrates that local planning policy on housing mix requirements need to be flexible enough to account for the differences in spatial context and constraints.

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

5.15 As part of the Housing Needs of Specific Groups Update prepared by Iceni, a model for recommended housing mixes across the Greater Cambridge area has been developed, with separate housing mix recommendations being made for Cambridge and South Cambridgeshire. The study uses population projections that Iceni have developed, that are linked to the standard methodology calculations for identifying housing needs, to forecast changes in household types between 2024

and 2045. The study forecasts the following for the Greater Cambridge area in the 2024 – 2045 period:

- There is expected to be a large percentage growth in the 65+ years age category (circa. 43%) in total population terms, this equates to circa 22,300 people.
- Growth in the number of people under 16 years of age is projected to grow by 21,700 people in absolute terms.
- There is a higher proportion of people relocating into South Cambridgeshire than there are locals looking to rent, this is mostly due to the work opportunities and access to Cambridge.

5.16 The models for both Cambridge and South Cambridgeshire were based on the current profile of housing in terms of size (bedrooms) and tenure. Within the data (sourced from the Local Authority Housing Statics and 2021 Census data), information is available about the age of households and the typical sizes of homes they occupy. By using demographic projections, it is possible to see which age groups are expected to change in number, and by how much. On the assumption that occupancy patterns for each age group (within each tenure) remain the same, it was possible to assess the profile of housing needed over the assessment period (taken to be 2024-45 to be consistent with other analysis in this report). Adjustments were also made to the models to account for overcrowding, underoccupancy, and other contextual factors that can influence housing demands (e.g. homelessness, and the impacts of an ageing population and trends in housing demands amongst older people). The study recommends the housing mixes set out in Table 7 and Table 8 below.

Table 7: Suggested size mix of housing by tenure – Cambridge

Number of Bedrooms	Market	Affordable home ownership	Affordable housing (rented)- General needs	Affordable housing (rented)- Older persons
1-bedroom	10%	20%	20%	50%
2-bedrooms	35%	45%	35%	50%
3-bedrooms	35%	25%	30%	50%
4+-bedrooms	20%	10%	15%	50%

Table 8: Suggested size mix of housing by tenure – South Cambridgeshire

Number of Bedrooms	Market	Affordable home ownership	Affordable housing (rented)-General needs	Affordable housing (rented)- Older persons
1-bedroom	5%	15%	20%	40%
2-bedrooms	30%	45%	35%	60%
3-bedrooms	40%	30%	35%	60%
4+-bedrooms	25%	10%	10%	60%

5.17 The study recommends that local issues and circumstances should also be considered when identifying the appropriate housing mix for a particular development, but that there would need to be justification for a housing mix that differs significantly from the suggested housing mix. Further to this, the study recommends that housing mix requirements built into local planning policy should be constructed with flexibility to ensure that more optimal accommodation mixes can be delivered, particularly in cases where development is being promoted to meet a particular community need or variations are needed to account for site constraints.

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

<u>Greater Cambridge Growth Sectors Study: Life Science and ICT Locational,</u> Land and Accommodation Needs (2025)

5.19 Iceni have prepared a report on the key economic sectors driving growth in Greater Cambridge: the information and communication sector, the professional, scientific and technical sector (which includes research and development activities), and the education sector. Stakeholders from these sectors highlighted a perception that the delivery of new housing was not keeping pace with the employment growth in Greater Cambridge. This was accompanied by a perception that, whilst people in top-paying roles could afford housing in Greater Cambridge, housing options for technical and entry-level staff still needed to be accommodated, particularly in areas that are well connected to places of work; increases in student accommodation and housing suitable for young people were viewed as important to the retention of the area's talent pool.

Additional alternative approaches considered

5.20 No additional alternative approaches identified.

Draft policy and reasons

5.21 The draft policy can be viewed in the Local Plan.

5.22 National planning policy requires the housing needs of different groups in the community, in terms of both the size and type of home, to be assessed, and these local housing needs are to be reflected in adopted planning policies. Therefore, to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, it is important that we plan for a mix of housing based on the needs of different groups in the community.

5.23 The high cost of housing locally affects the size of home that many people can afford, even if their preference would be for a smaller property, and it is important to provide for everyone's needs and help create mixed and balanced communities. This has been highlighted by Iceni's Greater Cambridge Growth Sectors Study (2025), which highlighted a need for housing options that young people can afford to ensure that entry-level staff and young professionals can live in Greater Cambridge, and the

area can retain skilled workers. As illustrated by monitoring data for Greater Cambridge, until the 2021/22 reporting year, a significant proportion of housing completions comprised 3-bedroom or 4-bedroom homes, yet in more recent years, there has appears to have been a surge in the delivery of 1- or 2-bedroom homes.

5.24 Given the evidence, the Councils have sought to introduce a housing mix requirement, based on robust evidence of forecast demand over the plan period, to act as a baseline for new developments of 10 or more dwelling units in Cambridge and South Cambridgeshire.

Response to issues raised in representations

5.25 Ensuring local planning policies are both relevant and adaptable to local development contexts is a key consideration for the Councils. The percentage housing mixes presented within the Housing Needs of Specific Groups Update for Greater Cambridge (2025) have been included within the policy to provide applicants and decision-makers with a baseline housing mix to which new development of 10 or more dwellings should aim to achieve, unless an exception to the mix can be justified. Inclusion of the indicative housing mix within the policy is considered reasonable because it will ensure that new residential development will aim to deliver homes in line with forecast demand figures for the Greater Cambridge area. This approach is a progression of Policy H/9: Housing Mix of the adopted South Cambridgeshire Local Plan (2018) but adapted to include requirements for Cambridge and figures that are based on more up-to-date evidence of the area's needs.

5.26 Notwithstanding the above, the Councils also acknowledge that there are circumstances where a rigid housing mix would prevent some types of development from meeting specific needs or would be difficult to accommodate given the character and housing mix of the surrounding area. Developments of a particular nature, such as student accommodation development, specialist housing for older people, or developments for custom and self-build homes, may be allowed to deviate from the housing mix requirements in the policy, subject to the submission of evidence as part of a planning application that the development will meet an

identifiable accommodation need. The policy also highlights that deviations from the housing mix may be allowed due to the location of a particular development and the nature of the surrounding character, but planning applications will need to be accompanied by evidence that, to the satisfaction of the Local Planning Authority, justifies the alternative housing mix.

5.27 Acknowledging comments that new development should support the delivery of different types of housing, as well as different housing sizes, the policy explicitly supports proposals that introduce different accommodation types that are both sympathetic to a site's specific development context and any identified local or community needs.

5.28 The Councils also accept that the use of planning conditions or other planning obligations need to be relevant to the development permitted and reasonable in all respects. Therefore, only in some special circumstances, the Local Planning Authority may use planning conditions or other planning instruments to protect the housing mix of developments that have been designed to meet a particular community need

Further work and next steps

5.29 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

6. Policy H/GL: Garden land and subdivision of existing plots

Issue the plan is seeking to respond to

6.1 Gardens are an important environmental resource and are a vital component of Greater Cambridge's character. The plan needs to guide development on land used as residential gardens or other residential plots to ensure that only suitable and appropriate developments take place on such land.

How the issue was covered in the First Proposals consultation

6.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/GL: Garden land and subdivision of existing plots

6.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

6.4 There have been no changes to the national or local policy context from that which informed the First Proposals, and is set out in the Homes Topic Paper (2021).

Summary of issues arising from First Proposals representations

6.5 There was general support for the policy from a range of public bodies and third sector organisations, although there were some additional comments that gardens can help mitigate surface water flooding and provide buffer zones to ecological sites, the policy needs to be strongly worded to prevent detrimental impact on neighbours, and there is a need to consider each proposal on a case by case basis. A parish council commented that green space is needed around properties in rural settings and developments in villages should have gardens of a reasonable size. One individual was opposed to sub-division of plots unless on very large plots where in keeping with the surroundings.

6.6 Concern was raised that there is often little biodiversity mitigation required for infill developments and that there has been a gradual loss of green habitat and trees. It was suggested the policy should be strongly worded to require biodiversity mitigation/enhancement. Also, Anglian Water were concerned that parking and hard landscaping areas increase the risk of surface water flooding and suggest the policy should require use of permeable materials.

6.7 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

6.8 N/A

Additional alternative approaches considered

6.9 No additional alternative approaches identified.

Draft policy and reasons

- 6.10 The draft policy can be viewed in the Local Plan.
- 6.11 Gardens are an important environmental resource and they can make a major contribution to local character and amenity. National planning policy sets out that Local Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, and there is currently no national guidance specifically relating to residential annexes.
- 6.12 The draft policy references a range of considerations for determining whether proposals for new dwellings or new residential annexes within gardens are acceptable, including ensuring: provision of suitable amenity space and privacy for all properties, appropriate design and materials taking account of the character of the area, and safe and adequate access arrangements and parking spaces. The policy will also seek to stop development that would compromise the potential of other land to be brought forward for development, and also highlights other considerations

depending on whether the new dwelling or residential annexe is within or outside the defined development extent of a settlement.

6.13 The draft policy also specifically refers to residential annexes, and provides additional considerations for determining whether proposals for residential annexes are acceptable. The Councils anticipate that there will be increasing demand for residential annexes as intergenerational living rises, people live longer, and the costs of residential care remain high. To support families and an ageing population, well-designed residential annexes that help households adapt to changing circumstances will be supported, provided that the annexe remains subsidiary to the principal dwelling.

6.14 <u>Class E of the Town and Country Planning (General Permitted Development)</u> (England) Order 2015 permits residential outbuildings specifically for uses that are incidental to the enjoyment of the principal dwelling. This includes uses such as garden rooms, storage areas, home offices, or hobby spaces, provided that specific criteria relating to the size, height and location of the building are met and that the outbuildings do not contain all the primary living accommodation functions of kitchens, bathrooms, and bedrooms such that they create self-contained dwellings. Residential outbuildings, allowed through permitted development rights, should not be capable of being occupied as residential annexes or independent dwellings.

Response to issues raised in representations

6.15 There were comments which were strongly in favour of protecting gardens. This policy responds to these concerns by setting criteria to guide development on garden land to ensure that new development is appropriate and alongside consideration of other policies in the Local Plan mitigates negative impacts on ecology, biodiversity, heritage, surface water flooding and other local considerations. The detailed criteria set out in criterion 1 enable proposals to be considered on a case by case basis.

Further work and next steps

6.16 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.



7. Policy H/SS: Residential space standards and accessible homes

Issue the plan is seeking to respond to

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

How the issue was covered in the First Proposals consultation

7.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/SS: Residential space standards and accessible homes

7.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

Raising accessibility standards for new homes: summary of consultation responses and government response (July 2022)

7.4 In September 2020, the government consulted on options to raise the accessibility standards of new homes, including the option of mandating a higher accessibility standard. The government provided a summary of the consultation responses and set out its response in July 2022. The key outcome is that the government plans to mandate the M4(2) accessible and adaptable dwellings requirement in Building Regulations as a minimum standard for all new homes and will implement this in due course through a change to Building Regulations. Alongside this, the government states that the M4(3) wheelchair user dwellings standard will continue to be applied where requirements are established in a local plan, tailored to local demand and evidenced by need.

<u>Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and</u> Annexes 1-8

7.5 The Greater Cambridge Housing Strategy 2024-2029 (Annex 2) sets out a proposed direction of travel for adaptable and accessible affordable homes, expecting all new affordable homes to be built to Building Regulations M4(2) accessible and adaptable standards, with some new affordable homes to be built to Building Regulations M4(3) wheelchair user dwellings standard based on identified needs. It also sets a direction of travel that on strategic sites, a minimum of 5% of the affordable homes should be M4(3) wheelchair user dwellings, and that any further requirements around providing wheelchair user dwellings more broadly will be through consideration of new or updated evidence, and/or taking account of any national changes to requirements.

Summary of issues arising from First Proposals representations

- 7.6 Support for use of nationally described space standards from a mix of respondents. However, site promoters and housebuilders have asked for additional evidence and justification for their use as required by the NPPF. A statement that there are no nationally prescribed standards for use class C2 schemes.
- 7.7 General support for requirements for accessible and adaptable homes meeting M4(2) and M4(3) standards. However, specific comments seeking higher proportion of homes required to meet M4(3) standards and requesting that this applies to both market and affordable homes. An individual is seeking amendments from these national standards. Site promoters and housebuilders suggest that additional evidence and justification is needed, and that an ageing population alone is not a reason to seek these standards.
- 7.8 Support for requirement that new homes should have their own private amenity space, but with some respondents seeking flexibility as they do not believe that it is always necessary. A request that student accommodation is exempt from this requirement.

7.9 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Homes Topic Paper Appendix 1: Evidence to support the case for applying the

Nationally Described Space Standard to new residential development in

Greater Cambridge (2025)

- 7.10 This study justifies the continued application of the NDSS to new dwellings within the emerging Greater Cambridge Local Plan. National planning practice guidance sets out that where a local planning authority wishes to apply the Nationally Described Space Standard that they must justify its use with regard to need, viability and timing. The research undertaken has demonstrated that since the introduction of the NDSS, the majority of planning applications in Greater Cambridge already comply with the NDSS. This is in contrast to applications received prior to 2018. Furthermore, the research has shown that the policies are being applied flexibly, in particular where specific housing types and accommodation needs justify an alternative approach to the size of the accommodation, or where the proposal meets the objectives of the NDSS overall.
- 7.11 The study sets out that it is important to emphasise that further evidence of need exists to support the continued policy approach. In particular, societal trends mean that many older people are looking to downsize to enable them to continue living independently, and they need adequate storage and good room sizes to achieve this. Furthermore, the Covid-19 pandemic saw a significant change in living patterns with many more people working from home and therefore requiring greater space, and changes to rented affordable housing has also resulted in households choosing to downsize to avoid the spare room subsidy ('bedroom tax'). The study highlights that this policy is further justified given under-occupancy rates and the 'affordability-gap' existing in the Greater Cambridge area.
- 7.12 Viability testing as part of both the adopted Cambridge and South
 Cambridgeshire Local Plans showed that a policy requiring new homes to meet the
 NDSS would not have an impact on the viability of proposed developments. A

viability assessment was produced in August 2021. The NDSS was applied as the minimum standard to all scheme typologies for all appraisals. It has not impacted viability, and all typologies were found to be policy compliant in terms of being able to deliver appropriate levels of affordable housing and infrastructure contributions. In terms of timing, a space standard policy has been adopted across Greater Cambridge since 2018, so it is considered that no transitional period is required.

7.13 An updated Viability Assessment has been prepared to accompany the Draft Local Plan. This continues to show the package of policy measures, including application of national space standards, remains viable.

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

7.14 The study reports that based on the Census 2021, 28.2% of households in Greater Cambridge contained someone with a disability and 14.7% of the overall Greater Cambridge population had a disability. The study highlights that the largest proportion of those with a disability in Greater Cambridge are aged 65 or over. Moving forward, for the 2024-2045 period, the older population is projected to grow significantly with a 43% increase expected in the population aged 65+ in Greater Cambridge. Based on the population projections for aged 65+, there is expected to be a 53.4% increase by 2045 in those with mobility problems in Cambridge and a 54.5% increase in those with mobility problems in South Cambridgeshire. The study also separately identifies increases in the population with impaired mobility in the 16-64 age range – a 30.3% increase in Cambridge and a 16.0% increase in South Cambridgeshire by 2045. The study states that given the projected change shown in the number of people with disabilities, this provides clear evidence to justify requiring all new dwellings (in all tenures) to meet Building Regulations M4(2) standard, subject to viability and site suitability.

7.15 The study also provides data on the estimated need for wheelchair user homes between 2024-2025, and based on projections concludes that there is a need for an additional 968 wheelchair user homes by 2045. The study highlights that there is likely to be a need for a greater proportion of affordable housing to rent for wheelchair users. The study recommends that up to 5% of all new market homes and up to 10% of all new affordable homes should be wheelchair user dwellings

(Building Regulations M4(3) standard). The study outlines that where the authority has nomination rights, the supply of M4(3) dwellings should be wheelchair adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user) unless there is an identified specific need for wheelchair accessible dwellings (constructed for immediate occupation). In the market sector, the study outlines they should be wheelchair adaptable dwellings. The study states that there will be cases where achieving Building Regulations M4(3) standard may not be possible due to viability or site-specific circumstances, and therefore the policy should allow for flexibility.

Viability Assessment (2025)

7.16 The draft Local Plan has been subject to a whole plan viability assessment. This continues to show the package of policy measures, including the application of national space standards and the application of accessible and adaptable homes standards, remains viable.

Additional alternative approaches considered

7.17 No additional alternative approaches identified.

Draft policy and reasons

7.18 The draft policy can be viewed in the Local Plan.

7.19 The Councils have set out their case to justify the need, viability and timing for continuing to apply the Nationally Described Space Standards in the Greater Cambridge Local Plan in 'Evidence to support the case for applying the Nationally Described Space Standard to new residential development in Greater Cambridge' (see Appendix 1 of this Topic Paper). The study assesses the application of the adopted planning policies for internal space standards from the Cambridge and South Cambridgeshire Local Plans 2018 on planning applications. The study finds that the majority of applications already comply with the nationally described space standard and that the policies are being applied flexibly, in particular where specific housing types and accommodation needs justify an alternative approach to the size of the accommodation, or where the proposal meets the objectives of the NDSS overall. There are also societal trends that further justify the continuation of the

requirement to meet nationally described space standards. Across Greater Cambridge, households are seeking bigger houses with additional rooms to compensate for the small sizes of rooms. The Councils are aware that this is not a sustainable model, and therefore by continuing to apply nationally described space standards to all residential units created through new build, conversion and change of use, are seeking to counter the trend towards under occupancy in larger homes by ensuring that all homes provide sufficient space to allow for homes to be adapted to changing needs and lifestyles.

7.20 External private amenity space can make an important contribution to improving quality of life of residents. It is therefore important that all new dwellings have access to private external amenity space. The Councils have introduced minimum external amenity space standards for new homes, along with criteria to ensure that any spaces meet the daily needs of the residents and are useable. It is important to note that the internal and external amenity space standards are expressed as minimum space standards, and housing that exceeds standards will always be encouraged. The internal and external amenity space standards apply to all tenures of housing in Greater Cambridge, and all homes created through conversion, change of use, or new build.

7.21 It is clear that the government intends to raise accessibility standards for new homes by setting out that it intends to mandate meeting the Building Regulations M4(2) accessible and adaptable dwellings requirement as a minimum standard for all new homes. The Housing Needs of Specific Groups Update (2025) also recommends that all new homes should be required to meet this standard, given the projected increase in older people and people with disabilities. In light of national and local evidence, the Councils have therefore set the requirement for all new homes to meet the Building Regulations M4(2) standard.

7.22 Regarding Building Regulations M4(3) wheelchair user dwellings, the government are clear that where standards are established in a local plan they must be justified by evidence of need. Between 2024 and 2045, our evidence projects an increase in the number of older people, an increase in the number of older people with mobility problems, and an increase in the number of people with mobility

problems, impaired mobility and wheelchair users. It also shows a likely need for a greater proportion of affordable housing to rent for wheelchair users. The Housing Needs for Specific Groups Update recommends that up to 5% of all new market homes and up to 10% of all new affordable homes should be wheelchair user dwellings, and sets out that these figures reflect that not all sites would be able to deliver homes of this type. The policy therefore requires a proportion of both market and affordable dwellings to be designed to meet the Building Regulations M4(3) wheelchair user standard. Based on our evidence, we believe that there is a clear need to set this requirement to ensure that Greater Cambridge is meeting the demand for wheelchair user dwellings.

7.23 National planning guidance sets out that Building Regulations M4(3)(b) 'wheelchair accessible' dwellings can only be sought where the Council has nomination rights, and therefore the policy expects any wheelchair user dwellings to be delivered as Building Regulations M4 (3)(a) 'wheelchair adaptable' dwellings, unless the Council has identified a specific need for 'wheelchair accessible' dwellings at the time of the application.

Response to issues raised in representations

7.24 There were calls for the Councils to provide evidence and justification for the inclusion of residential space standards in the Greater Cambridge Local Plan, as required by national planning guidance. The Councils have set out their evidence in Appendix 1 to this Topic Paper. As required, the Councils have provided justification for requiring internal space standards by considering need, viability and timing:

- Need: the research undertaken has demonstrated that since the introduction
 of the nationally described space standard, the majority of planning
 applications in Greater Cambridge comply with the nationally described
 space standard. This is in contrast to applications received prior to 2018.
 Furthermore, the research has shown that the policies are being applied
 flexibly. Additionally, societal trends provide further justification of need in
 the Greater Cambridge area.
- Viability: the nationally described space standard was applied as the minimum standard to all scheme typologies for all appraisals and it has not

- impacted viability. All typologies were found to be policy compliant in terms of being able to deliver appropriate levels of affordable housing and infrastructure contributions.
- Timing: As an internal residential space standard policy has been applied across Greater Cambridge since 2018, it is considered there is no need for a transitional period.
- 7.25 Comments suggested that there are no nationally prescribed standards for use class C2 schemes. As set out in the supporting text, there may be specific developments where meeting the required standards would not be appropriate for the identified occupants. Any exceptions would need to be clearly justified with evidence provided to demonstrate that the proposed development still delivers suitable and appropriate homes for the identified occupants.
- 7.26 Respondents highlighted that it will not always be possible for every home to have direct access to private amenity space. The policy continues to seek private external amenity space for all new homes, however, the policy requirements allow for flexibility in the form of the provision of the private external amenity space, and consideration to be given to the location, context, orientation, and design of the proposed development. The policy also provides criteria to ensure that appropriate communal spaces can be delivered on certain schemes.
- 7.27 Developers had called for minimum private external amenity space standards to be defined in future drafts of the Greater Cambridge Local Plan. The policy sets out clear criteria for private external amenity spaces, as well as a set of defined minimum standards, that must applied in combination when formulating proposals. These have been set to ensure that all dwellings across Greater Cambridge are delivering private external amenity spaces that are well designed and appropriate for the intended dwelling.
- 7.28 There were several respondents requesting the Councils to provide evidence for the proportion of dwellings designed to meet the Building Regulations M4(2) and/or the M4(3) standards set out in the Local Plan, and the Councils to consider the inclusion of a proportion of market housing to meet the wheelchair user

standards. National planning guidance sets out that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Building Regulations M4(2) and/or M4(3) standards and should not impose any additional information requirements. As set out in the Housing Needs of Specific Groups Update 2025, it is evident that there will be increases in the proportion of older people and those with health and mobility problems during the plan period. There is also an identified specific need for homes for wheelchair users. In light of this evidence, the policy requires all new build dwellings to be at least Building Regulations M4(2) compliant, and a proportion of both market and affordable dwellings to be the higher Building Regulations M4(3) standard.

Further work and next steps

7.29 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

8. Policy H/SH: Specialist housing

Issue the plan is seeking to respond to

- 8.1 National planning policy requires the size, type and tenure of homes needed for different groups in the community to be assessed and that the results of that assessment be reflected in planning policies.
- 8.2 Specialist housing (within both Use Classes C2 and C3) can be needed to support a variety of groups such as older people, people with disabilities, people with alcohol or drug dependency, those requiring refuge from harassment and violence, looked after children and others who may, for a variety of reasons, be excluded from the local community. Specialist housing is designed so that support can be provided to its occupants (and often to others in the wider community) while promoting independent living where possible. Examples of specialist housing range from a small scheme of cluster flats with additional facilities for support staff which is designed for specific client needs, such as those with learning disabilities, to much larger extra care schemes enabling older and disabled people to live more independently in their own self-contained accommodation but with care and support on-site. It can also include accommodation such as care homes where the occupant will have an ensuite bedroom but not a self-contained dwelling.

How the issue was covered in the First Proposals consultation

- 8.3 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/SH: Specialist housing and homes for older people
- 8.4 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

 Homes Topic Paper

Policy context update

National Planning Policy Framework and National Planning Practice Guidance

8.5 Paragraph 63 of the National Planning Policy Framework (NPPF 2024) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The NPPF 2024 also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

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

8.7 There are different forms of specialist housing for older people:

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

- residential care homes and nursing homes these have individual bedrooms, ideally ensuite, and provide a high level of care meeting all activities of daily living. This type of housing can also include dementia care homes.
- 8.8 Some of these forms of specialist housing will be considered to be use class C3 (dwellings) and some will be considered to be use class C2 (residential institutions / communal accommodation). National planning guidance sets out that it is for the local planning authority to determine which use class a particular development falls into but suggests that when making the decision consideration could be given to the level of care provided and the scale of communal facilities provided.
- 8.9 National planning guidance also sets out that communal (use class C2) accommodation provided in the form of bedspaces for older people can be counted towards delivering the housing requirement based on the amount of accommodation those new bedspaces release to the wider housing market (National Planning Practice Guidance, published July 2019, Paragraph: 034 Reference ID: 6803520190722). The Housing Delivery Test rulebook sets out the ratios to be used to convert bedspaces to dwellings for older peoples accommodation.

<u>Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and Annexes 1-8</u>

- 8.10 The Greater Cambridge Housing Strategy 2024-2029 sets out that the Councils will work with Cambridgeshire County Council to help find housing solutions for disabled people, and support delivery of other types of specialist accommodation for those who need it.
- 8.11 The housing strategy aims to support more people to live independently for longer. Providing more accessible and adaptable homes is a key tenet of this approach alongside providing better quality accommodation through the use of space standards. These changes will also help older people to downsize thereby having beneficial knock-on effects on the wider housing market. Much market and affordable housing occupied by older people is under-occupied.

- 8.12 The housing strategy recognises that this approach must be complemented by increasing the quantity and range of specialist accommodation. Therefore, both councils are interested in exploring more specialist housing options, including dementia-friendly developments. The strategy recognises that specialist accommodation of this nature may be provided as market housing or as part of the affordable housing requirements where this is supported by the County Council. However, where retirement living accommodation is proposed as a standalone scheme and does not provide high levels of care provision, a financial contribution will be sought in lieu of any affordable housing contribution.
- 8.13 The housing strategy also supports the development of housing to meet a range of other specialist needs. Some of this provision may be met within mainstream housing, with additional care and support being provided, either through existing or new homes. Both councils will continue to work with the County Council, developers and other partners to help secure appropriate accommodation on new developments where a need is identified. This type of accommodation will be included as part of any affordable housing requirement.
- 8.14 Annex 6 of the housing strategy identifies a range of sources which quantify the scale and nature of need for specialist housing. Since the housing strategy was published some of the studies have been updated. These findings are considered as part of the New or Updated Evidence base section.

Summary of issues arising from First Proposals representations

8.15 There was general support for a policy focus on specialist housing and homes for older people from parish councils and developers. Parish councils want housing for older people to be integrated within wider communities and close to local services and transport. They also call for more independent living opportunities for the more able older people to allow downsizing and for accommodation to be sufficiently flexible to allow people to stay in their homes if their mobility decreases. Developers want more land set aside for specialist housing and homes for older people with specific allocations to avoid crowding out from other housing types. They argue for a greater variety of sites to increase choice for older people. They also argue that the

First Proposals are too dependent on urban extensions and new settlements and call for more brownfield and windfall sites in urban and suburban locations alongside release of land in the green belt. One developer supports the continuation of the existing approach used in Cambridge based on the criteria-based Policy 47: 'Specialist Housing' within the 2018 Cambridge Local Plan.

New or updated evidence base

Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and Annexes 1-8

8.16 Annex 6 of the Greater Cambridge Housing Strategy 2024-2029 identifies a range of sources which quantify the scale and nature of need for specialist housing. Some of the evidence cited was available and used in drafting the First Proposals. However, some new data published after the First Proposals was included. The County Council published demand profiles for both older peoples accommodation and specialist supported accommodation for adults 18-64 (Learning Disability, Autism, Mental Health, and Physical Disability Specialist Accommodation) which includes forecasts of need up to 2036 (for older peoples accommodation) and 2041 (for specialist supported accommodation).

8.17 The profiles show an increase in demand for all types of accommodation for older people. However, the County Council does expect to see some of the demand for care home type accommodation being met by more tailored versions of extracare schemes and an increase in domiciliary care hours to allow more people to continue to live independently. Demand for specialist supported accommodation for adults 18-64 (Learning Disability, Autism, Mental Health, and Physical Disability Specialist Accommodation) is lower in absolute terms than demand for older people's accommodation. However, growth is strong with the strongest growth for supported living accommodation where demand is expected to more than double over the period 2021-2041. The main reason for this growth is that the life expectancy of people with moderate to severe learning disabilities and other coexisting physical conditions is increasing which means that their numbers are increasing more rapidly than the 18-64 population as a whole.

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

- 8.18 The over 65s population in Greater Cambridge is projected to grow strongly over the period 2024-2045. Growth will be stronger than for the population aged under 65 and growth will be strongest for the oldest cohorts within the '65+' group. The study estimates a need for 2,573 self-contained dwellings for older people and disabled people and 1,508 bedspaces although it acknowledges this is an 'upper end estimate'.
- 8.19 There is a correlation between age and many health conditions and the ageing population is clearly an important driver in projections showing an increase in the numbers of people with a disability or health condition. The fastest growing conditions are dementia and mobility problems. In total, more than one in four households in Greater Cambridge have someone with a disability or health condition.
- 8.20 The majority of older people live in their own home. Owner occupation is the most common tenure (the majority without a mortgage) followed by affordable housing and the private rented sector. A policy focus on helping older people to stay in their own home alongside an increase in M4 (2) and M4(3) dwellings and more dwellings meeting space standards generally should enable this situation to continue. Projections suggest an increased need for almost 1,000 additional dwellings built to M4(3) standard. However, a growing and ageing population does mean that there will also be an increasing demand for specialist housing for older people. This will span a range of options from retirement schemes with minimal support to care homes specialising in dementia. There is likely to be a shift from affordable tenure options to market tenures.
- 8.21 Other groups that require specialist housing tend to comprise smaller cohorts. The study estimates an increased demand for 7 additional residential beds in children's care homes by 2045 but recognises that there are other solutions such as familial and foster support.

Viability Assessment (2025)

8.22 The draft Local Plan has been subject to a whole plan viability assessment. This identifies that it is viable to seek affordable housing contributions from specialist housing.

Additional alternative approaches considered

8.23 No additional alternative approaches identified.

Draft policy and reasons

8.24 The draft policy can be viewed in the Local Plan.

8.25 The NPPF requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. Specialist housing is designed so that support can be provided to its occupants where required (and often to others in the wider community) while promoting independent living.

8.26 A key focus of this policy is older people but it is not the only target group. There are a range of other groups with specific housing needs which are supported by this policy. These include disabled people, people with alcohol or drug dependency, those requiring refuge from harassment and violence, and others who may, for a variety of reasons, need specialist supported housing. These needs are also supported through other policies. For example, the need to help older people or disabled people downsize or stay within their community through 'whole life housing' approaches are also addressed in Policy H/HM: Housing mix and Policy H/SS: Residential space standards and accessible homes. Student accommodation needs are not covered by this policy as they are specifically covered in Policy H/SA: Student Accommodation.

8.27 The Councils have evidence of significant, and sometimes growing, need across a range of groups of people.

- 8.28 Greater Cambridge, in common with the country generally, has an ageing population. The older age cohorts within the broader retirement age group are increasing the most quickly. The result is an increasing demand for all types of specialist accommodation for older people spanning the least care intensive such as general housing that is M4(2) or M4(3) compliant and age restricted housing developments through to more care intensive options such as extra care accommodation and care homes.
- 8.29 It is noteworthy that even in age restricted housing developments where the minimum age may be as low as 55 the vast majority of inhabitants are considerably older, often 75+. Hence, most methodologies for estimating need focus on prevalence rates for the over 75s.
- 8.30 Needs do not always fit neatly into one specific accommodation type and can change over time so it is not appropriate to set precise targets for specific accommodation types. Demand across the different types of accommodation can also be influenced over time by changing government policy and funding. New types of specialist accommodation for older people and disabled people are also being developed.
- 8.31 In terms of tenure the evidence suggests that there is a surplus of affordable accommodation at the sheltered housing level which is more than counter-balanced by a deficit of affordable accommodation within extra care schemes and care homes. There is a shortage of market accommodation across all accommodation types.
- 8.32 Development proposals will need to demonstrate how they are responding to the demand for accommodation for older people and disabled people both in terms of type and tenure.
- 8.33 There is a relationship between the ageing population and the rising need for accommodation for people with disabilities. However, the relationship is not exclusive. The needs of people with physical disabilities and mental health or learning disabilities can span all age cohorts. Some of these needs will be addressed by adapting more general housing and some will be met by specialist residential

accommodation. Again, development proposals will need to demonstrate how they are responding to market signals. In so far as need is to be met by adapting general housing this will also be addressed through Policy H/SS: Residential space standards and accessible homes.

- 8.34 More specific accommodation needs for groups such as looked after children or those with alcohol or drug dependencies tend to be smaller and hence are difficult to model over a twenty year period. Policy H/SH supports bespoke proposals to address these needs where evidence of need and how a range of criteria are met are demonstrated.
- 8.35 Viability issues can influence both large scale developments including specialist housing proposals and specific specialist housing proposals. Viability has been considered though a whole plan viability assessment.
- 8.36 Policy S/SH: Specialist housing takes a multi-dimensional approach to increasing the delivery of specialist housing. Strategic sites are anticipated to play a key role due to their scale and potential to integrate groups at risk of isolation into the wider community whilst also aligning them with new facilities. The Cambridge and South Cambridgeshire Local Plans (both adopted in 2018) and Area Action Plans allocated a number of strategic sites. Some of these sites included the potential for specialist accommodation but in practice relatively little has come forward as developers have argued that viability and market intelligence have encouraged a preference for more general market housing.
- 8.37 As set out in the Development Strategy Topic Paper Appendix 9: Meeting the specialist housing needs of older people and those with disabilities, existing commitments and proposed requirements for allocations are anticipated to deliver 3,256 dwellings (or equivalent dwellings where bedspaces delivered) within the plan period of 2024-2045. This would be the majority of the identified need. Windfall sites including schemes focused specifically on specialist housing will also play an important role in meeting need.

Response to issues raised in representations

8.38 There were calls for housing for older people to be integrated within wider communities and close to local services and transport. Ensuring that strategic sites include a proportion of accommodation for older people will help to achieve this as the developments can be planned so that accommodation for older people (and other specific groups where appropriate) are close to services that meet their needs.

8.39 It was argued that creating more independent living opportunities for more able older people will allow downsizing. Creating more independent living opportunities is partly about providing more choices. The more options older people have the more likely they are to find accommodation that enables them to live independently for longer. Some of these choices will be generated by offering a wider range of specialist accommodation, some will be generated by specifically adapting mainstream housing (facilitated through accessibility standards) and some will be generated by ensuring market housing is generally more spacious (through residential space standards).

8.40 Developers want more land set aside for specialist housing. The allocated strategic sites include requirements for the provision of specialist housing, and this draft policy requires unallocated strategic sites of 1,000 dwellings or more to include 10% of these homes as specialist housing for older and disabled people. The plan includes specific requirements for specialist housing for older people and disabled people, but also allows for a potential reduction in the requirement if the identified needs can be demonstrated to have been met or offset. This approach provides flexibility in responding to changes in market demand and is therefore considered more robust over the longer term.

8.41 Some respondents argued that the First Proposals are too dependent on urban extensions and new settlements. The criteria policy approach allows sites to come forward across a range of spatial areas where appropriate. For example, proposals will need to be proportionate in scale to the settlement where they are proposed. However, it is considered preferable that a significant proportion of specialist housing

is provided on strategic sites as these are best able to integrate older people and other specific groups with the facilities and services they need.

8.42 There was support for the continuation of the existing approach used in Cambridge. Policy 47 of the current Cambridge Local Plan (2018) set out specific criteria against which all proposals for specialist housing will be assessed. The draft policy applies these criteria across Greater Cambridge. The criteria aim to ensure that specialist housing is needs driven, suitable for intended occupiers, close to essential services and facilities and does not over-dominate local areas. In addition, the criteria set out the conditions which must be met for proposals that will result in the net loss of specialist housing.

Further work and next steps

8.43 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

9. Policy H/CB: Self and custom build homes

Issue the plan is seeking to respond to

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

How the issue was covered in the First Proposals consultation

9.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/CB: Self and custom build homes

9.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

Levelling Up and Regeneration Act (2023)

- 9.4 Changes resulting from section 123 of the Levelling Up and Regeneration Act (2023) have widened the deficit Greater Cambridge faces in meeting its duty to match custom and self build home permissions to demand.
- 9.5 Demand for custom and self build homes is measured by reference to the custom and self build register. However, any deficit in a given base year is now cumulative and carries over into future base periods. This is retrospective and applies from the 2016 base date for registers. This has significant implications for Greater Cambridge given that there have been deficits in several years.
- 9.6 Section 123 of the Act also redefines a qualifying 'development permission' when assessing whether the duty to grant sufficient permissions has been addressed. A

stricter definition is now applied where any relevant permissions must be specifically for building custom and self build homes. The definition may be tightened further through future Regulations supporting the Act by requiring any permissions for custom and self build homes to be characterised by a condition or planning obligation making that requirement explicit.

Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and Annexes 1-8

9.7 The Greater Cambridge Housing Strategy 2024-2029 (Annex 1, section 11) sets out some requirements of custom and self build development from a housing policy perspective. Notably, it is expected that developments which comprise high density multi-storey flats and apartments will meet their custom and self build requirements through custom finish units in the form of flats and apartments built to a shell finish where occupiers determine the final layout and internal finish. Annex 1 is also clear that custom and self build homes will only be classified as affordable housing where they meet the NPPF definition, meet the needs of those priced out of the housing market, and will remain as affordable housing in perpetuity.

Summary of issues arising from First Proposals representations

9.8 Some general support for the policy, however detailed comments from developers / housebuilders on specifics of the proposed approach. Site promoters supported the requirement for self and custom build homes to be linked to demand on the Greater Cambridge Custom and Self Build Register and highlighted that this will mean that continual monitoring is required to ensure up to date information is available. Comments from some that the proposed approach will not deliver the necessary plots to meet the demand from the register and that the plots will not meet the wishes of those on the register, but this is countered by others that consider that the proposed approach will deliver more plots than there is demand for. Requests for further evidence and justification for the proposed approach, including the requirement for 5% custom and self build homes on major developments. Site promoters suggest that the policy should have a more flexible approach that supports self and custom build developments on the edge of settlements.

- 9.9 Developers and housebuilders have highlighted concerns about the viability of the proposed approach and also that the marketing period for a custom and self build plot before it can be built without the self and custom build restrictions should be reduced to 6 months. Home Builders Federation suggest that including self and custom build plots within major developments adds to the complexity of their delivery. Specific request for custom finish to be included within the policy to enable high density developments to be able to comply with the requirements.
- 9.10 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Greater Cambridge Custom and Self Build Homes Register

- 9.11 The Greater Cambridge Custom and Self Build Register is updated annually alongside the number of permissions that have been granted for custom and self build homes. Base period 6 covers the period 31 October 2020 to 30 October 2021. However, a local authority can count permissions up to three years after this date (up to 30 October 2024). At this point Greater Cambridge had a cumulative deficit of 456 custom and self build homes. Over base periods 7, 8 and 9 there have been a further 244 entries onto the register. This means that to eradicate the deficit by base period 9 there will need to be permissions for an additional 700 custom and self build homes by 30 October 2027.
- 9.12 The introduction of a small administrative charge to join the register for base period 9 did result in a much lower number of entries. However, entries will continue growing year on year, albeit probably more slowly, further adding to the demand for custom and self build homes. The Greater Cambridge Custom and Self Build Register does not use a local connection or financial solvency test and national planning practice guidance now discourages their introduction unless there is a strong justification for doing so.
- 9.13 The register indicates that demand is mainly for detached, large properties with most households considering themselves to be at the self-build end of the spectrum

and seeking a high degree of autonomy and control over the delivery and final design of their home.

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

9.14 In addition to comparing demand and supply for custom and self build, the study also looks at the characteristics of demand (applicants on the register). This showed that:

- 74% of people on the register sought a detached home;
- 29% on the register sought a bungalow;
- 52% on the register sought a plot in South Cambridgeshire, 3% in Cambridge and 43% in either;
- Over half (53%) sought 4 or more bedrooms; and
- 49% suggested that higher environmental performance was a motivator, 29% said cost, 10% said a retirement home, 8% said downsizing, and 5% were responding to their disability.

9.15 This data was compared with a secondary data source from Custom Build Homes. This alternative data source is based on information provided voluntarily by private individuals who want to custom or self-build their own home in local authority areas across England, Scotland, and Wales. It includes 1,301 subscribers (in April 2025) in Greater Cambridge which is a higher estimate compared to the level of need identified by the Greater Cambridge Custom and Self Build Register (1,087 applicants as at 30 October 2024). The profile of those interested in building their own home in Greater Cambridge is similar but the data does provide some additional insights:

- Most prospective custom and self-builders are living with a partner (73%).
 Just over half have no children (53%).
- The age of respondents varies widely, but only 25% are younger than 36.
 Most prospective custom and self-builders are aged between 36-60 (67%).
 There are a few over 60 (8%).
- Most potential plot purchasers work full-time (83%) and the majority (67%) have household incomes over £60,000.

- Most potential plot purchasers (64%) are asset-rich with an existing home to sell. Half (50%) need a mortgage to fund their project.
- There is an overwhelming number of prospective purchasers (88%) who
 wish to follow the self-build model of designing a home from scratch.

9.16 National Custom and Self-Build Association (NaCSBA) data provides another alternative, lower, measure of demand. This estimates that Greater Cambridge requires 217 units per 100,000 head of population which translates into a need for 699 plots in 2024 with a further 230 plots by 2045 due to population growth associated with the standard method.

9.17 All three data sources use very different methods to estimate the level of demand for custom and self build plots in Greater Cambridge. They all estimate significant, albeit different, demand for custom and self build plots. Legislation requires that the Greater Cambridge Custom and Self Build Register is used as the measure of current demand. However, projecting need forward over the next 20 years is problematic. The number of new registrants has varied considerably from year to year. Numbers have been falling in recent years and the introduction of a charge for joining the register led to only 32 applicants joining the register in base period 9, the lowest level to date by far. The Housing Needs of Specific Groups Update suggests taking an average of the last 3 years data as a proxy for future additional annual demand. This equates to about 50 applicants per year.

Additional alternative approaches considered

9.18 No additional alternative approaches identified.

Draft policy and reasons

9.19 The draft policy can be viewed in the Local Plan.

9.20 Prior to the Levelling-up and Regeneration Act (2023) the key custom and self build housing legislation comprised:

- Self-build and Custom Housebuilding Act 2015
- Self-Build and Custom Housebuilding Regulations 2016

- Self-build and Custom Housebuilding (Time for Compliance and Fees)
 Regulations 2016
- 9.21 Collectively, this legislation imposes three duties on local planning authorities:
- 1. To establish and maintain a custom and self build register,
- 2. To have regard to the register in carrying out its planning functions (both plan making and decision taking) alongside wider duties including housing, land disposal and regeneration, and
- 3. To grant sufficient custom and self build permissions to match demand as measured by the register.
- 9.22 Section 123 of the Levelling-up and Regeneration Act (2023) came into effect on 31 January 2024 and made two significant reforms in relation to custom and self build homes. Firstly, any deficit in matching demand is cumulative and should be carried over into the next base period (and is retrospective going back to 2016). Secondly, permissions that can count towards meeting demand must be specifically for custom and self build homes. The Act also makes provision for new Regulations to be even more explicit in defining what can be counted as a custom and self build housing permission.
- 9.23 The National Planning Policy Framework also emphasises the important contribution of custom and self build housing towards the government's objective of significantly boosting the supply of homes. Paragraph 63 states in establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies and these groups explicitly includes those wishing to commission or build their own homes.
- 9.24 Planning Practice Guidance provides further detailed guidance on how local planning authorities should support custom and self build housing.
- 9.25 The Greater Cambridge Housing Strategy 2024 to 2029 recognises the role of custom and self build in speeding up housing delivery by supporting a more diversified market. It acknowledges that some development will come forward as high density multi storey flats and apartments and that custom and self build homes

within these developments will need to be provided as custom finish units built to a shell finish where occupiers determine the final layout and internal finish. This could include the location of internal walls, doors and fittings. It is important that these dwellings meet the legal definition of a custom and self build dwelling and contribute to the duty to match demand for custom and self build plots with permissions.

9.26 The strategy also accepts that custom and self build homes are generally classified as market housing. To be classified as affordable they must demonstrate that they meet the affordable housing criteria set out in the NPPF and will meet the needs of those priced out of the housing market. They should also remain as affordable housing in perpetuity. On mixed tenure sites requiring an affordable housing component, the custom and self build dwellings will count towards the market housing element unless they are demonstrably affordable housing. Standalone custom and self build developments are expected to contribute to the delivery of affordable housing in line with Policy H/AH: Affordable housing. However, it is recognised that this is likely to be through a commuted sum. On site delivery through a Registered Provider or community led housing group will be acceptable but the number of providers interested in this type of delivery is considered to be limited.

9.27 The proposed policy approach responds to the changing legislative and policy framework that provides strong support to increase custom and self build housing delivery in the context of a widening local deficit of custom and self build permissions in Greater Cambridge. Greater Cambridge would need to permit 700 additional custom and self build plots from 31 October 2024 to 30 October 2027 to match the cumulative deficit at the end of base period 9. Assuming the custom and self build register grows by 50 applicants per year would imply another 1,000 permissions over the next 20 years. Arguably, the need will be slightly lower due to the 3 year time lag which means permissions granted by 2045 would only have to match need up to 2042 but the basic point remains that there is a need to increase the supply of permissions significantly.

9.28 Past trends suggest windfall delivery of about 50 custom and self build plots per year. It is difficult to be precise about the impact of a 5% requirement on sites of 20

or more dwellings. Many larger strategic sites which will deliver the majority of custom and self build plots under this approach already have an outline planning permission which includes a commitment to include custom and self build but no explicit number. It is estimated that applying a 5% requirement to all current allocations and proposed allocations in the emerging Local Plan could generate a maximum of 1,400 permissions. This estimate adjusts for existing allocations where the number of custom and self build plots has already been agreed. However, it is likely to exaggerate the final number of permissions because some existing allocations are likely to deliver less than 5% of their dwellings as custom and self build plots. Nevertheless, the estimates do demonstrate that the policy approach is capable of delivering the required number of custom and self build plots and the Local Plan does allow the 5% requirement to be scaled down in the event of a surplus being achieved.

9.29 The policy requires that proposals for standalone custom and self build developments are assessed against the same criteria as other proposals for residential development. It is recognised that some flexibility will need to be applied while the local planning authorities are not meeting their statutory duty to match the demand for custom and self build plots with permissions. However, the requirement to deliver 5% of dwellings as custom and self build plots on all developments of 20 or more dwellings will remove the current deficit as quickly as is realistically practical.

9.30 It is important to ensure that the 5% requirement is applied wherever appropriate and that all permissions for custom and self build are built out as custom and self build and that this happens as quickly as possible. Therefore, the policy sets a number of conditions to reduce the likelihood of custom and self build plots being built out as mainstream market housing and to ensure the resulting custom and self build dwellings meet legal definitions and can be included in the official count of custom and self build permissions. The policy also acknowledges that custom and self build may need to take the form of custom finish in high density flatted developments.

Response to issues raised in representations

9.31 There were calls for more monitoring to ensure permissions better match demand. Legislative changes have already impacted on the nature of permissions that can be counted as custom and self build permissions and our monitoring systems have been adapted to reflect these by capturing the reason for classifying each permission as a custom and self build permission. The register is not considered to provide an accurate reflection of the nature of demand. Registrants have provided little information about their needs and circumstances, there may be a significant gap between what registrants desire and what they can afford, and many registrants may no longer be interested in building their own home in Greater Cambridge (they may already have built their own home in Greater Cambridge or elsewhere or may have changed their plans). Government guidance and legislation is clear that even where registrants are no longer interested in building their own home in Greater Cambridge they should not be removed from the measure of demand.

9.32 It was argued that more evidence is needed to justify the requirement for 5% custom and self build homes on all proposals of 20+ dwellings. Greater Cambridge has a significant deficit in matching the supply of custom and self build permissions to demand and this deficit has widened in recent years. A number of decisions to refuse permission for custom and self build homes in South Cambridgeshire have been overturned at appeal. Inspectors have concluded that the shortage of supply has outweighed any conflicts with the Local Plan where there are no significant impacts on the character of the local area. Delivering custom and self build homes on larger sites is a key part of the strategy to increase delivery in accordance with the spatial strategy.

9.33 There was support for specific custom and self build sites on the edge of settlements. The majority of custom and self build homes permitted in Greater Cambridge since 2016 have been in, or adjacent to, villages in South Cambridgeshire. The policy is intended to create a more balanced spatial distribution of custom and self build but it is intended that there will continue to be opportunities for custom and self build housing within rural communities. However, an exception

site approach is not supported as this will potentially displace rural exception sites which have a strong track record in helping to sustain balanced communities in South Cambridgeshire villages where house prices can be out of reach of local people.

9.34 Developers called for more flexibility to reduce custom and self build plots due to viability and to lessen marketing periods before plots can be switched to market housing. Viability assessment has demonstrated that the requirement to include 5% of homes within proposals of 20 or more dwellings as custom and self build plots is viable at the plan level. Specific sites will have the opportunity to identify site specific issues. A twelve month marketing period is essentially a compromise between those that want shorter or longer periods but seems to be a commonly adopted approach. The requirement that custom and self build plots not delivered as custom and self build dwellings should be built out as affordable housing should act as an incentive for delivery. The register indicates strong demand but the policy recognises that if this current deficit in supply recedes the 5% level could be lowered to better match supply and demand.

9.35 There was support for custom finish to be included to enable high density flatted developments to comply with requirements. It is recognised that high density flatted developments will make up a major element of housing delivery in Greater Cambridge and a failure to deliver custom and self build homes on these sites would undermine the plan's ability to match demand. The Greater Cambridge Housing Strategy 2024-2029 recognises the potential to deliver custom finish homes in these developments but it is essential that they meet the legal definition of custom and self build housing if they are to contribute towards meeting the statutory duty to permit sufficient permission to match demand.

Further work and next steps

9.36 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

10. Policy H/BR: Build to rent homes

Issue the plan is seeking to respond to

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

How the issue was covered in the First Proposals consultation

10.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/BR: Build to rent homes

10.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and Annexes 1-8

10.4 Annex 5 of the Greater Cambridge Housing Strategy 2024-2029 provides additional detailed guidance on the Councils' requirements for new Build to Rent developments. It is recognised that there is no single model for Build to Rent but schemes do have certain characteristics. They should provide good quality homes designed and built specifically for the rented sector. They should have a covenant of at least 15 years with tenancies available for at least 3 years. Schemes should be professionally managed and in single ownership and control. There will be an element of affordable housing in the form of Affordable Private Rent.

10.5 The Councils have a model s106 agreement which will be expected to be used as a basis for agreeing details of all new Build to Rent schemes. This would include decommissioning and clawback rules for market and affordable properties.

10.6 Research has identified a potential market for Build to Rent in response to affordability issues and a resulting demand for private renting generally. Demand is expected to primarily come from students, academics and young professionals. As a result, demand is likely to be focused on 1 and 2 bed homes although some larger homes will be required to cater for families or sharers. Homes in Multiple Occupation (HMOs), sometimes known as co-living in this context, may be appropriate in some circumstances as part of a wider mix if they help to create a more balanced community.

10.7 Affordable Private Rent could make a valuable contribution to addressing affordable housing needs. However, a 20% reduction in rent may not be enough to make it truly affordable. Therefore, rents should always be capped at Local Housing Allowance rates as a minimum. Where Build to Rent is part of a larger multi-tenure site it is important that it does not dominate the scheme. This will make it difficult to achieve the wider policy requirement of 40% affordable housing on all major developments and restrict the scope to incorporate other affordable tenures.

10.8 Valuation guidance for Build to Rent is set out by RICS in <u>Valuing residential</u> <u>property purpose built for renting</u> (or subsequent amendment). Any potential tradeoffs between different elements of this policy on viability grounds will require clear evidence of why the full requirements cannot be met.

Summary of issues arising from First Proposals representations

10.9 There is support from site promoters and developers, and some Parish Councils, for the proposed approach to Build to Rent, given that it plays an important role in meeting housing needs, provides choice to residents and diversifies the housing market, and helps to create mixed and balanced communities. However, there are differing opinions on whether 20% affordable homes is the right approach, and strong objections from site promoters to any kind of restriction or limit on the amount of Build to Rent allowed within a development. Some site promoters and developers have suggested that there needs to be more flexibility within the proposed approach, and that more research is needed on Build to Rent by the

Councils to inform the Local Plan and North East Cambridge Area Action Plan. An individual is concerned that there are already too many Build to Rent developments.

10.10 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

10.11 The Housing Needs of Specific Groups Update compiles findings from a range of data and reports, some of which was used to inform the First Proposals. The report highlights the growth of the private rental sector. Nationally, it is now the second largest tenure after owner occupation. The private rented sector is particularly strong in Cambridge with push and pull factors at work. High house prices push people towards the rental market whilst the strong local labour market acts as a pull by attracting new workers to the area often looking for flexible housing options.

10.12 The report confirms that there are still no operational Build to Rent schemes in Greater Cambridge although there are four of various sizes in the pipeline. Experience from schemes elsewhere suggest that Build to Rent schemes may have their own distinctive occupational profile. They are particularly attractive to young and professional singles and couples who are often seeking flexibility due to the nature of their work. There may be interest in shared accommodation, sometimes known as co-living. This is likely to be attractive to students as an alternative to purpose-built student accommodation. The relatively strong housing market means there is also likely to be interest from individuals and families with limited home ownership options due to high house prices and deposit requirements. The report concludes that it would be unwise to be overly-prescriptive on housing mix given the evolving nature of the sector and the degree of uncertainty regarding the profile of demand for Build to Rent.

Viability Assessment (2025)

10.13 The draft Local Plan has been subject to a whole plan viability assessment. This identifies that it is viable to seek affordable housing contributions from Build to Rent developments at similar levels to other homes.

Draft policy and reasons

- 10.14 The draft policy can be viewed in the Local Plan.
- 10.15 Paragraph 63 of the National Planning Policy Framework (NPPF 2024) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community including those who rent their homes and reflect the results of this assessment in their planning policies.
- 10.16 Build to Rent is a specific form of private rented sector accommodation and is defined in the Glossary of the NPPF 2024 as purpose-built accommodation for the rented sector which is professionally managed and in single ownership and control. It should offer relatively long tenancy agreements of at least three years.
- 10.17 The Housing Needs of Specific Groups Update for Greater Cambridge (2025) highlights the strength of the local private rented sector, particularly in Cambridge. Although there are currently no operational Build to Rent schemes in Greater Cambridge there are some in the pipeline and potential demand is considered to be strong driven by the unaffordability of home ownership options, strong student demand and a buoyant labour market drawing in young professionals often looking for flexible or temporary accommodation options.
- 10.18 Annex 5 of the Greater Cambridge Housing Strategy 2024-2029 provides a detailed review of the requirements expected of Build to Rent development proposals in Greater Cambridge. These are similar criteria to those in The Build To Rent Market Strategic Overview and Summary of Site-Specific Appraisals report (Arc4, March 2021) and are not repeated here. The criteria from these documents have been synthesised and summarised in Policy H/BR: Build to Rent Homes but the whole of the annex is relevant and is a material consideration in determining

planning applications. A number of the criteria are designed to ensure that proposals fit and stay within the parameters of Build to Rent accommodation. These include criteria concerning tenancy agreements, covenants and scheme management.

10.19 Management of Build to Rent developments by a single management operator, with an appropriate level of on-site daily management, will minimise any community risks arising from the development, and ensure that schemes are well-integrated into the community. A Management Plan showing how the whole development will be managed and maintained must be produced and submitted with the planning application, and the agreed Management Plan should be secured through a Section 106 agreement. The Management Plan should include detailed information on long term management and maintenance arrangements, and outline the measures that will be in place to manage any issues arising that could impact on amenity in the surrounding area.

10.20 Criteria also focus on the potential of Build to Rent homes to contribute to place shaping and the creation of mixed and balanced communities. The First Proposals suggested using a fixed limit on the number or proportion of Build to Rent homes within development proposals to avoid them having an over-bearing impact on their neighbourhood. However, it has proved impractical to devise a limit that works across different sites. Therefore, proposals will be assessed on a case by case basis to consider how the scheme will support the place shaping agenda and meet local housing need, and demonstrate that the scheme complements the existing or proposed surroundings in terms of scale and other wider policy considerations. Build to Rent schemes are required to meet all design criteria that apply to other residential schemes such as space standards, accessibility standards and sustainability standards. Distributing the Build to Rent homes across multitenure schemes and providing a mix of property sizes will foster community cohesion.

10.21 The Build to Rent section of the PPG (published September 2018) sets out that the affordable homes within a Build to Rent development should be provided as Affordable Private Rent homes, and that 20% is generally a suitable benchmark for the level of Affordable Private Rent homes to be provided. The PPG outlines that if

local authorities wish to set a different proportion of Affordable Private Rent homes that they should justify this using evidence and set this out within their Local Plan. Guidance is also provided on how the rent for the Affordable Private Rent homes should be calculated and on scheme management. Viability evidence shows that 40% Affordable Private Rent could be achieved in the strong Greater Cambridge housing market. However, a 20% reduction in rents below market rates may not be affordable to many households, hence, the Greater Cambridge Housing Strategy's preference that rents should always be capped at Local Housing Allowance rates as a minimum. Where viability provides scope, the priority will be to increase rent discounts (beyond the 20% set out in national planning guidance) rather than to seek the full 40% Affordable Private Rent.

10.22 Greater Cambridge has a significant need for affordable housing across a range of tenures. The policy seeks to ensure large multi-tenure sites offer a range of affordable tenures and that the most affordable tenures of affordable housing are not squeezed out by Affordable Private Rent.

Additional alternative approaches considered

10.23 No additional alternative approaches identified.

Response to issues raised in representations

10.24 There was support for the inclusion of a positive policy for Build to Rent. The policy is supportive of Build to Rent homes proposals where they meet a range of criteria. This approach is consistent with national policy and uses local evidence to shape the criteria where appropriate.

10.25 There was opposition to the imposition of any limits on Build to Rent. The First Proposals suggested exploring the appropriateness of introducing a limit to the scale of Build to Rent as a proportion of all dwellings. Whilst this has proved impractical the explicit policy intention remains that Build to Rent proposals do not create an over-concentration of this tenure in a local area. Proposals will be assessed on a case by case basis against a range of criteria designed, in part, to ensure Build to Rent proposals reflect local demand, contribute to place shaping, and support the

development of mixed and balanced communities. Assessing proposals on a case by case basis also allows for specific circumstances affecting viability to be considered. However, evidence suggests that a level higher than 20% Affordable Private Rent is viable, and therefore the standard 40% rate for other types of homes is proposed.

10.26 Some respondents argued that Build to Rent is not affordable. Evidence has shown that Build to Rent can form one option in a complex housing market. It will not be affordable to all households but is likely to be affordable to some households that cannot afford, or do not wish, to purchase their own home. Local Plan viability evidence demonstrates that 40% affordable homes within Build to Rent schemes is achievable but this may need to be balanced with the level of discount in comparison with local market rents (including service charges) on a case by case basis to achieve affordability for more households.

Further work and next steps

10.27 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

11. Policy H/CO: Co-living

Issue the plan is seeking to respond to

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

How the issue was covered in the First Proposals consultation

11.2 Co-living developments were not covered in the First Proposals version of the Local Plan.

Policy context update

National Planning Policy Framework (NPPF, December 2024)

11.3 There is no definition of Co-living in the NPPF or Planning Practice Guidance (PPG), however, the NPPF requires the size, type and tenure of homes needed for different groups in the community, including those who rent their homes, to be assessed and that the results of that assessment be reflected in planning policies.

Summary of issues arising from First Proposals representations

- 11.4 The issue of Co-living was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue.
- 11.5 However, during the drafting process and development of evidence, it was considered that the Local Plan would be more effective with a standalone policy that responds to the demand for co-living accommodation.

New or updated evidence base

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

11.6 The Housing Needs of Specific Groups Update highlights that research indicates that demand for co-living accommodation is concentrated in London and other major regional cities, as the target residents of co-living units are typically students, recent graduates and young professionals. The update suggests that co-

living developments could therefore be provided in Greater Cambridge, and recommends that the Councils consider a specific policy for co-living in the Local Plan.

- 11.7 The update outlines that as well as addressing a housing need, co-living benefits young professionals facing affordability pressures, as well as those who are new to an area, as it allows them to establish roots and make friendships when otherwise they might face a degree of isolation.
- 11.8 The update recommends that the Councils' policy on affordable housing provision in co-living schemes should be informed by up-to-date viability evidence, and that as the viability of co-living schemes needs to take account of the income being generated over time rather than when properties are sold this may mean seeking a different contribution of affordable housing than the wider general housing Policies.

Draft policy and reasons

- 11.9 The draft policy can be viewed in the Local Plan.
- 11.10 Paragraph 63 of the National Planning Policy Framework (NPPF 2024) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community including those who rent their homes and reflect the results of this assessment in their planning policies.
- 11.11 Co-living developments also known as large-scale purpose-built shared living developments comprise of non-self-contained studios, with extensive communal facilities that are under a single management company. Co-living developments have an emphasis on communal living, with large-scale shared dining, recreation and sometimes workspaces, as well as additional services and facilities such as room cleaning, provision of bed linen, an on-site gym, and a concierge service.

- 11.12 Co-living developments are becoming more popular, and can respond to a need by providing an alternative type of accommodation for single-person households to living in self-contained homes, houses in multiple occupation (HMOs) or flat shares. Whilst not currently commonplace in Greater Cambridge, developers are seeking pre-application advice on proposals for co-living developments, and therefore the Local Plan needs to be clear how these proposals will be considered.
- 11.13 Development of Co-living units will be directed to the most sustainable areas of Greater Cambridge, well connected to active travel routes, public transport links and services. Therefore, car use will not be relied on, and onsite car parking should be kept to a minimum. Details of any proposed car parking should be submitted with the planning application with justification of provision. New proposals should not result in over-concentration of Co-living units within an area or harm the delivery of a mix of housing to meet needs, and should contribute towards creating mixed and inclusive neighbourhoods.
- 11.14 Co-living developments are generally of at least 50 units, to allow for the provision of the additional on-site services and facilities. There is currently no clear guidance on the maximum number of units. Considering Co-living units are likely to be used on a transitional basis, unless there is clear evidence of need for a higher number of units, developments will be restricted to a maximum of 200 units. This is because Co-living developments should not compromise the delivery of self-contained homes.
- 11.15 Co-living developments respond to a housing need, and like HMOs or flat shares will be the main or only residence for some people. Any Co-living developments will contribute towards meeting our housing requirement on a pro-rata basis, in line with the ratio for other communal accommodation set out within the Housing Delivery Test rulebook (which is currently 1.9 units to one dwelling).
- 11.16 Co-living developments must be well-designed and provide functional internal living spaces and external amenity spaces for their residents. Proposals should consider the internal and external residential space standards set out in Policy H/SS: Residential space standards and accessible homes. For example, the internal

residential spaces standards set out in Policy H/SS include specific requirements for the floorspace of bedrooms, which could be applied to Co-living developments, if the internal communal areas provided the remainder of the internal space standard requirements. Additionally, as Co-living developments have a similar format to HMOs in that they have communal areas such as kitchens, proposals should also consider the minimum size standards related to internal communal areas such as kitchens set out in licensing standards for HMOs (see Policy H/MO: Houses in Multiple Occupation).

- 11.17 A proportion of units should be designed to be accessible and adaptable for those who have minimal mobility, taking account of the requirements set out in Policy H/SS: Residential space standards and accessible homes.
- 11.18 Tenancies should be for a minimum of three months to ensure large-scale purpose-built shared living developments do not effectively operate as a hostel.
- 11.19 Co-living developments differ from other housing types for the following reasons:
 - Self-contained housing (use class C3), because there is an emphasis on communal living. Large-scale shared dining, recreation and sometimes workspaces are provided in addition to private individual studio units that are not-self-contained.
 - HMOs, due to the size of the developments and the extent of communal spaces and facilities.
 - Hotels (use class C1) and hostels (sui generis), due to the requirement for minimum tenancies of no less than 3 months.
 - Residential institutions (use class C2), as there is no significant element of care or training provided.
 - Student accommodation, as this has a focus on student needs, and has links with universities.
- 11.20 Management of Co-living developments by a single management company or operator, with an appropriate level of on-site daily management, will minimise any

community risks arising from the development, and ensure that schemes are well-integrated into the community. A Management Plan showing how the whole development will be managed and maintained must be produced and submitted with the planning application, and the agreed Management Plan should be secured through a Section 106 agreement. The Management Plan should include, but not be limited to, detailed information on long term management and maintenance arrangements, such as:

- a. measures in place to manage any issues arising that could impact on amenity in the surrounding area,
- b. security and fire safety procedures,
- c. move in and move out arrangements,
- d. how all internal and external areas of the development will be maintained,
- e. how communal spaces and private units will be cleaned and how linen changing services will operate,
- f. how deliveries for servicing the development and residents' deliveries will be managed, and
- g. tenancies, including that sub-letting is not permitted.
- 11.21 Buildings should be designed and managed in a way that lowers barriers to social interaction and encourages engagement between people, such as:
 - incidental meeting spaces should be provided in public and semi-public spaces within the building,
 - communal kitchen spaces should be designed for social interaction, such as shared kitchens with cooking stations facing each other,
 - amenity spaces should be of a size and quality that actively encourages their use and community engagement, and
 - where appropriate, entrance lobbies and public amenities such as restaurants and bars should encourage use by the surrounding local community as well as the internal community.
- 11.22 Policy BG/EO: Providing and Enhancing Open Space is used to signpost the requirements for public open space. Affordable units should be provided in accordance with Policy H/AH: Affordable housing.

Additional alternative approaches considered

11.23 No policy - Not considered a reasonable alternative as plans are required to assess the size, type and tenure of housing needs for different groups in the community, including those who rent their homes and reflect this in planning policies.

Response to issues raised in representations

11.24 The issue of Co-living was not covered in the First Proposals version of the Local Plan, and therefore there are no representations on this issue.

Further work and next steps

11.25 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

12. Policy H/MO: Houses in multiple occupation (HMOs)

Issue the plan is seeking to respond to

12.1 HMOs provide an important contribution to the housing mix by providing a relatively affordable form of private rented accommodation for students and single person households. However, they can be perceived to offer low quality accommodation and have a negative impact on local communities when they dominate a neighbourhood.

How the issue was covered in the First Proposals consultation

12.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/MO: Houses in multiple occupation (HMOs)

12.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and Annexes 1-8

12.4 The Greater Cambridge Housing Strategy recognises that well managed HMOs can provide a relatively affordable housing solution for single households. It also recognises that whilst Cambridge is the primary location it will also be appropriate to deliver HMOs in suitable locations in South Cambridgeshire. However, it warns against an over-concentration of provision in local areas and the potential adverse impacts that can be associated with this.

12.5 Annex 5 in Housing Strategy sets out a series of expectations for Build to Rent schemes including quality (environmental and space standards), housing mix, management, tenancy agreements and affordable private rent requirements.

Summary of issues arising from First Proposals representations

12.6 Despite the low number of responses there was no consensus. Those in support recognised the contribution HMOs make to the housing mix but also wanted the policy to include purpose built self-contained housing for single person households and to be tightened to improve the quality of HMO housing. However, some respondents were concerned that the development of HMOs has a negative effect on the character and social cohesion of neighbourhoods.

12.7 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

The geographic distribution of HMOs

12.8 The geographic distribution of HMOs in Cambridge has been mapped by Census Output Area. Output Areas (OAs) are the are the lowest level of geographical area for census statistics. An output area consists of about 125 households. They are designed to be as socially homogenous as possible and large enough for Census statistics to be released without infringing confidentiality. Figure 1 shows the distribution of HMOs using Licensed HMO data (Nov 2024) and Council Tax HMO data (March 2025) from Cambridge City Council. These data sets have been combined and any duplications removed. The mapping shows that the most concentrated area of HMOs is at Addenbrookes Hospital with some further concentrations around Newmarket Road and at Eddington.

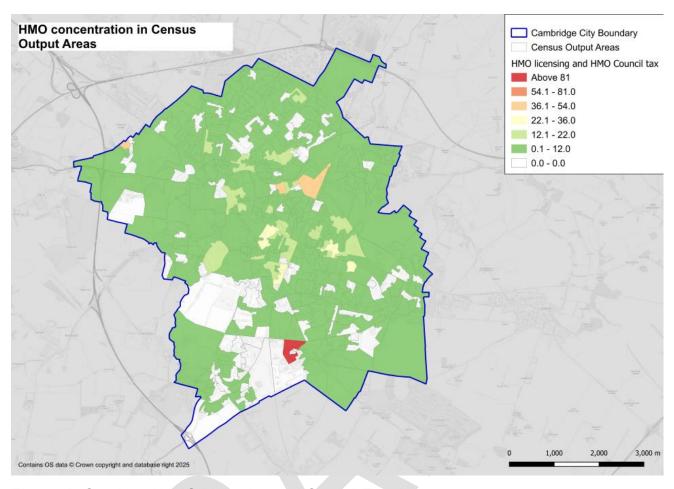


Figure 1: Combined HMO Licensing and Council Tax data

12.9 Mapping shared properties where all the residents are full-time students from Council Tax data (Figure 2) shows a concentration at Cambridge train station and around Churchill, Fitzwilliam and Murray Edwards colleges. Student halls are not included in this mapping. It is important to note that students that live in a hall of residence where there is an overall council tax exemption do not have to apply for a council tax exemption. Student only groups that live in spaces within housing blocks where there is no overall exemption will have applied by individual space and will be shown on the map.

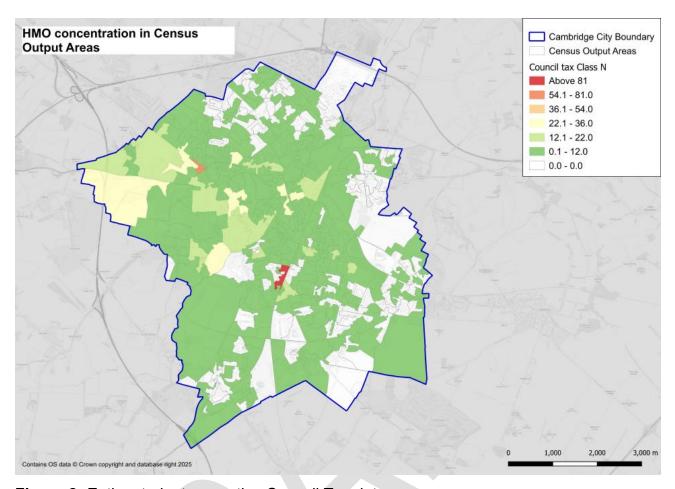


Figure 2: Entire student properties Council Tax data

12.10 Combining all three data sets and removing duplications (Figure 3) shows significant concentrations in the areas mentioned above and in the College areas to the north and south west of Cambridge city centre and on Mill Road.

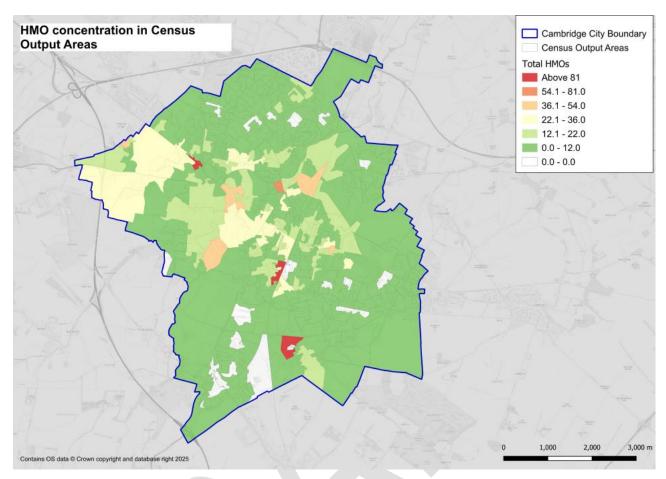


Figure 3: Combined HMO Licensing and Council Tax and entire student properties data

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

12.11 The updated Housing Needs for Specific Groups study has quantified the scale and location of HMOs in Greater Cambridge. The Local Authority Housing Statistics for 2023/24 estimate that there are 4,000 HMOs in Greater Cambridge with the majority being in Cambridge. About half are occupied by students with the other half occupied by a range of groups including young professionals and lower paid staff such as care workers, cleaners and porters at Addenbrookes Hospital. In South Cambridgeshire, HMOs also meet a need across a wider professional cohort, possibly linked to the research campuses and the high skilled labour market in the area. Despite the relatively low cost of HMOs there are very few benefit claimants living in them. The number of Universal Credit and Housing Benefit Claimants who are claiming for a single room allowance in Greater Cambridge had fallen to 29 by November 2024.

- 12.12 The housing market is strong in Greater Cambridge and this is reflected in high prices across the private rental sector including HMOs. In recent years, there has been an increase in landlords revoking their HMO licences, potentially due to forthcoming reforms in the private rented sector. However, many of these properties are subsequently relicensed after a sale although some do revert to family homes. Rooms in HMOs are quickly reoccupied, which in turn drives very high rents. The growth of purpose-built student accommodation by both the University of Cambridge and Anglia Ruskin University has not adversely impacted on the demand for HMO accommodation. It is too early to assess the potential impact of the Build to Rent sector.
- 12.13 Licensed HMOs can accommodate 5 or more residents. This size threshold differs from planning guidance and legislation which distinguishes between HMOs of 3 to 6 people (C4 use class) and HMOs of more than 6 people (sui generis use class).
- 12.14 An Article 4 Direction can be used to control smaller (C4 use class) HMOs by requiring planning permission for a change of use to or from a (C3 use class) residential dwelling. However, neither Cambridge City Council or South Cambridgeshire District Council have introduced such an article to date.
- 12.15 Despite concerns about an over concentration of HMOs in some neighbourhoods, research by Cambridge City Council and the police has found no evidence of direct correlation between HMOs and such issues as anti-social behaviour and drug misuse. Cambridge City Council has undertaken some enforcement action. This has involved a range of actions, including civil penalties for failing to obtain the necessary licence, breaching HMO management regulations (often related to fire safety), and neglecting improvement notices. However, the Council has sought only one banning order since the relevant legislation came into force in 2017 and is currently seeking to implement another.

Homes Topic Paper Appendix 1: Evidence for Residential Space Standards in Greater Cambridge (2025)

12.16 This study confirmed that the introduction of space standards when both Local Plans were adopted in 2018 had a positive effect on space standards in HMOs. Even though their use was aspirational rather than obligatory for HMOs created through a change of use, they were generally applied. Where HMOs did not meet the standards, they were refused on the grounds that they did not make provision for an acceptable level of amenity for future occupiers.

Draft policy and reasons

12.17 The draft policy can be viewed in the Local Plan.

12.18 HMOs are an important part of the housing market in Greater Cambridge, and particularly in Cambridge. They offer relatively low cost accommodation and meet the needs of a wide group of people including students, young professionals, other white-collar staff and lower paid staff generally. There are almost 4,000 HMOs, mainly in Cambridge, and about half are occupied by students with the other half occupied by a broader range of groups. HMOs can be found across most parts of Cambridge and are often located in the same streets as owner occupiers, affordable housing and other parts of the private rented sector.

12.19 Demand for accommodation remains strong across the private rented sector including HMOs. Vacant rooms in HMOs are quickly reoccupied, which in turn drives very high rents relative to other locations. The expansion of purpose-built student accommodation does not appear to have supressed demand. It is too early to tell if the growth of the Build to Rent sector will have an impact. However, it seems likely that there will be continued growth in the HMO sector in Greater Cambridge. Without intervention there is a risk HMOs could dominate some neighbourhoods. The draft policy seeks to allow further growth in HMOs whilst avoiding an over concentration in local communities.

12.20 The perceived threat of HMOs to local communities is arguably greater than the reality. Research by Cambridge City Council and the police has found no

evidence of direct correlation between HMOs and such issues as anti-social behaviour and drug misuse. However, Cambridge City Council has reported some enforcement activity concerning management issues. Avoiding an over concentration of HMOs in neighbourhoods, ensuring sites have adequate space for cycle and car parking and requiring appropriate management arrangements are put in place should all help to mitigate impacts on local residents.

12.21 HMOs have been subject to space standards since both Local Plans were adopted in 2018. The precise application has changed as government guidance has changed. However, the policies are considered to have been effective. Even where policy requirements were aspirational rather than mandatory HMOs have generally met the standards with some applications being refused on the grounds that they did not make provision for an acceptable level of amenity for future occupiers. The policy seeks to strengthen this approach by also applying standards required by the national licensing regime and external amenity space standards. About four in ten HMOs can accommodate 5 or more residents which means they are subject to the national licensing regime.

12.22 The Councils are considering introducing an Article 4 Direction to require planning permission for a change of use between residential (use class C3) and a HMO (use class C4) in particular locations. The policy has been drafted so that it will apply to all HMOs that require planning permission, and therefore to smaller HMOs if an Article 4 Direction is enacted. The Councils are also considering the impacts of increasing numbers of HMOs on the housing mix within Greater Cambridge, and in particular the current and future supply of family homes, as well as whether over concentration can be more specifically defined and evidenced.

Additional alternative approaches considered

12.23 No additional alternative approaches identified.

Response to issues raised in representations

12.24 Some respondents recognised that HMOs play an important role in diversifying the housing mix. The policy is supportive of HMO proposals where they

meet a range of criteria. This approach is consistent with national policy and uses local evidence to shape the criteria where appropriate.

12.25 There were calls for stronger controls to ensure HMOs do not have a detrimental impact on local neighbourhoods and that the quality of accommodation is appropriate. The policy will seek to control the degree of concentration in any neighbourhood whilst also driving up the quality of accommodation by requiring explicit management arrangements alongside the application of various space standards.

12.26 There was support for the delivery of purpose-built self-contained housing for single person households. However, this policy is focused on HMOs. The role of single person self-contained dwellings in diversifying the housing mix is recognised and is addressed through Policy H/HM: Housing mix.

Further work and next steps

12.27 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

13. Policy H/SA: Student accommodation

Issue the plan is seeking to respond to

13.1 National planning policy requires the size, type and tenure of homes needed for different groups in the community, including students, to be assessed and that the results of that assessment be reflected in planning policies. Although not a specified group within national policy, academic staff and academic visitors are identified as a group within the Greater Cambridge community for whom the councils consider that housing needs should be assessed and reflected through local plan policy. This group are included within the policy within the definition of student accommodation.

How the issue was covered in the First Proposals consultation

13.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/SA: Student accommodation

13.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

National Planning Policy Framework (NPPF, December 2024)

13.4 The new NPPF includes a number of changes to chapter 5 'Delivering a sufficient supply of homes'; specifically relevant to student accommodation is the addition at paragraph 71 that local planning authorities should support mixed tenure sites through their planning policies, including for such sites which include student accommodation. The policy allows for a flexible approach when considering applications for mixed tenure sites which include proposals for student accommodation.

<u>Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and</u> Annexes 1-8

13.5 The housing strategy recognises that when planning for new homes and communities it is essential to consider a range of factors; including student housing in Greater Cambridge. The strategy recognises that students are generally accommodated in either private rented accommodation or in accommodation provided by their educational institution (halls of residence). The strategy identifies Build to Rent housing as a model which may potentially meet the needs of some students but that this is an option associated with higher cost (see Policy H/BR).

Summary of issues arising from First Proposals representations

- 13.6 There was general support for the proposed student accommodation policy approach subject to a review of the overall student accommodation need. Croydon Parish Council raised concern about this need detracting from permanent local housing. One member of the public commented that there were already too many students. Histon & Impington Parish Council objected to student accommodation not providing visitor parking.
- 13.7 In terms of location, site promoters requested the city centre be treated as an appropriate location for new student accommodation. On this matter, Linton Parish Council supported the conversion of unused commercial buildings to student accommodation as a means of sustaining the city centre. One property developer suggested student accommodation directly adjacent to existing/proposed educational establishments should be supported.
- 13.8 The University of Cambridge raised concern about the intention for self-contained accommodation to be counted towards delivering the overall housing requirement for Greater Cambridge and highlighted that this approach should not be to the detriment of meeting other housing needs. Similarly, the Home Builders Federation highlighted the need for local evidence to ensure the dwelling equivalency rate used for student accommodation avoids overestimating the supply of homes returning to the open market.

13.9 Anglia Ruskin University raised concern with the policy approach which it considered unduly restrictive in that individual sites are effectively required to remain in their current general residential or student use, despite both contributing towards delivering the overall housing requirement. It suggested more policy flexibility in relation to individual sites.

13.10 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

13.11 The HNSG study considers data related to the accommodation choices available for students at the universities and other higher education institutions in Cambridge, and reports on anticipated student growth and predictions of accommodation needs from engagement with these institutions undertaken by officers.

Viability Assessment (2025)

13.12 The draft Local Plan has been subject to a whole plan viability assessment. This identifies that it is viable to seek affordable housing contributions from student housing.

<u>Development Strategy Topic Paper Appendix 10: Faculty Development and Student Accommodation Needs – Results of Engagement (2025)</u>

13.13 Officers carried out engagement with Anglia Ruskin University (ARU) and the University of Cambridge (UoC) and its Colleges in early 2023 to better understand their growth aspirations over the next 5-10 years.

13.14 In relation to student growth, the responses show that the majority of Colleges are either not seeking to increase their numbers of undergraduate students or do not have undergraduate students. Whereas, ARU and six Colleges all intend to grow their undergraduate numbers over the next 10 years, and the UoC and 14 Colleges (in association with UoC) all intend to grow their postgraduate numbers over the next

10 years. This results in additional need for teaching spaces and student accommodation. ARU and the Colleges accommodate different proportions of students within purpose-built student accommodation, and this also varies between undergraduates and postgraduates. Generally, there are lower proportions of postgraduate students living in UoC or College maintained accommodation.

13.15 Through the responses, there is an identified need of up to 2,042 student units by 2032/33 from ARU, UoC and its Colleges. Additionally, through the responses five Colleges have highlighted that up to 44 units for academic staff will be needed over the next 5-10 years.

13.16 Supply to meet the identified accommodation needs of students has been considered by the Councils, and completions in 2023/24 plus anticipated completions to 2032/33 from commitments will meet nearly 70% of the need identified. There are further student bedrooms with outline planning permission at North West Cambridge (Eddington) that are currently anticipated to be delivered after 2032/33, but which could be delivered sooner if necessary to meet the identified need, and taking these additional bedrooms into account would result in overprovision of student units against the currently identified need. It is also important to acknowledge there are likely to be other windfall developments for student accommodation, and strategic sites (other than Eddington) may also choose to deliver student accommodation as part of their housing mix.

13.17 For staff accommodation, North West Cambridge (Eddington) includes affordable housing to meet the needs of Cambridge University and College key workers. The delivery of this key worker accommodation would exceed the staff accommodation needs identified by the Colleges.

Draft policy and reasons

13.18 The draft policy can be viewed in the Local Plan.

13.19 National planning policy requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the

results of this assessment in their planning policies. Within this context undergraduate students, postgraduate students and academic staff are groups whose need for housing should be assessed and addressed in the Plan's policies. The Councils recognise the need to meet the local needs of this specific group, supporting proposals for new student accommodation development which helps meet the identified growth needs of existing educational institutions in Greater Cambridge.

13.20 National Planning Guidance also makes it clear that:

- Student accommodation should be considered within the wider needs of the community and requires the authority to liaise with universities and higher education institutions, to ensure that the local requirements are understood:
- In principle, student accommodation could be counted towards the housing requirement for a district based upon the amount of accommodation it releases for the wider housing market and/or the extent to which it allows general market housing to remain in such use; and
- Strategic policy-making authorities need to plan for sufficient student accommodation, which may be communal halls of residence or selfcontained dwellings, whether or not it is on the campus of the higher education institution.
- 13.21 The draft policy approach takes account of national planning policy and guidance, whilst seeking to ensure that development of student accommodation is delivered with appropriate controls. These will ensure that, within academic terms, approved schemes are either occupied solely as student accommodation for an identified institution or, for new development providing accommodation for academic staff, that occupancy is restricted to a maximum of 3 years.
- 13.22 The presence of two large universities (The University of Cambridge and Anglia Ruskin University) and other educational institutions within Cambridge impacts on the demographics and on the housing market of the city. It is also important to consider that the University of Cambridge is comprised of 31

autonomously governed Colleges centred around a central teaching University; with the colleges serving as individual academic residential institutions providing student accommodation. Within term-time the student community (comprising undergraduate and postgraduate students), academic staff and academic visitors contribute to the local economy and the diversity of Cambridge. Additionally, throughout the year (including out of term time), the city attracts delegates attending conferences and other groups of part-time/temporary students (for example-pre-university courses, short courses at specialist colleges, international students attending language schools). Many of these groups utilise the facilities and accommodation provided by both the universities and other educational institutions. Students attending higher education courses therefore make up a significant proportion of the population of the city of Cambridge and if adequate provision is not made for their needs it would lead to further pressure on the local housing market.

13.23 However, students themselves are diverse both within and across different institutions, as are their housing needs. There is an undergraduate population of students who reside in Cambridge during term time and who are likely to want some form of institutionally provided accommodation; there is also a large postgraduate population in Cambridge, some of whom will desire a more 'home-like' form of accommodation (particularly those students with family dependents). The boundaries between different groups of students, and other sectors of the population such as post-doctoral researchers and contract researchers, are quite blurred in terms of their housing needs and current provision. However, encouraging more dedicated student accommodation and academic staff accommodation can provide overall lower-cost housing that takes pressure off the private rented sector and increases the overall housing stock (due to the potential for release of market housing currently occupied for student accommodation).

13.24 Although many students reside in accommodation provided by their educational institution, there are a number of students who reside in privately rented accommodation, many in shared occupancy. The Housing Needs of Specific Groups Update (2025) reports that between 2011 and 2021 there has been an absolute growth in all types of student accommodation; however, there has been a decrease in the proportion of students living in university accommodation and an increase in

the proportion of students living in all student households. This affects availability of market housing, particularly of larger houses. The development of new student accommodation reduces demand for private accommodation occupied by full-time students and may release housing back onto the market to cater for wider housing needs. More specifically, the development of new self-contained postgraduate student housing or academic staff accommodation may facilitate the release of market housing currently used to accommodate postgraduate students or academic staff, as it caters to the differing needs of these persons who require to reside in this type of accommodation (for example individuals with dependents).

13.25 Policy 46 of the Cambridge City Local Plan 2018 supports the delivery of student accommodation to address the identified future growth aspirations of the institutions and to provide additional flexibility. This approach was evidenced based on the identified growth aspirations of both universities and the other institutions, which resulted in a total growth figure for the universities and the other institutions of 3,104 to 2026. Taking into account student accommodation units under construction or with planning permission at the time of the 2017 study, allocations in the local plan and the remaining allocation at North West Cambridge addressed and exceeded the growth figure of 3,104 to provide flexibility.

13.26 The policy needs to continue to support delivery of student accommodation and additionally support delivery of staff accommodation, to address the identified future growth aspirations of the institutions and to provide additional flexibility (upgrade/release of housing to private market etc.). ARU have identified a need for 800 additional bedspaces by 2025/26 to maintain 42% of its students living in purpose built student accommodation. For the University of Cambridge and its Colleges, the majority of Colleges are seeking to maintain the proportion of undergraduates living in purpose-built accommodation but are seeking to increase the proportion of postgraduates living in purpose built student accommodation. Through the responses, the Colleges have identified a need for up to 1,242 student units by 2032/33, with the majority being for postgraduates. This results in an identified need of up to 2,042 student units by 2032/33 from ARU, University of Cambridge and its Colleges. Additionally, through the responses five Colleges have

highlighted that up to 44 units for academic staff will be needed over the next 5-10 years.

13.27 As set out in the Development Strategy Topic Paper Appendix 10: Faculty Development and Student Accommodation Needs – Results of Engagement, completions in 2023/24 plus anticipated completions to 2032/33 from commitments will meet nearly 70% of the identified need. There are further student bedrooms with outline planning permission at North West Cambridge (Eddington) that are currently anticipated to be delivered after 2032/33, but which could be brought forward sooner if necessary to meet the identified need. Taking these additional bedrooms into account would result in over-provision of student units against the currently identified need. For staff accommodation, North West Cambridge (Eddington) includes affordable housing to meet the needs of Cambridge University and College key workers. The delivery of this key worker accommodation would exceed the staff accommodation needs identified by the Colleges. Windfall sites, as allowed for by this policy, will also play an important role in meeting need.

13.28 It can be difficult for some academic staff to secure accommodation, particularly within the private sector housing market of Cambridge (for example due to limited income or those on visiting/ non-paid contracts). Therefore, this policy allows for accommodation to be provided for this group by their own higher education institution, whilst ensuring that this is used appropriately by including restrictions on occupation secured through the use of obligations. Schemes providing accommodation for academic staff to meet the needs of an identified institution are by their nature unlikely to be suitable to meet wider housing needs and therefore some form of control is required (assuming approval is deemed appropriate as part of the scheme) to control how they would be occupied if not by the intended academic staff/ visitors. The restrictions for any new accommodation for occupation by academic staff have been previously agreed by applicants and Cambridge City Council (see planning application examples: 17/0928/FUL and 21/02052/FUL).

13.29 Some developments for student accommodation are delivered on sites that could equally be suitable for other types of housing, which would be required to provide affordable housing. The exception to this is where student accommodation is

delivered within an existing university or college campus, as other types of housing would not normally be delivered within these campuses. It is therefore important that any developments for student accommodation that are not being brought forward on a university / college campus or through the redevelopment of existing university / college owned student accommodation are required to provide a financial contribution towards meeting our affordable housing need. The provision of affordable housing on-site within a development for student accommodation is unlikely to be achievable due to management issues, and therefore a financial contribution is being sought that is comparable to the on-site delivery of affordable housing within other residential schemes. The affordable housing requirements from student accommodation are set out in Policy H/AH: Affordable housing.

13.30 Where proposals would result in a net loss of existing student housing planning permission will not be granted unless new accommodation to adequately replace lost accommodation is available for students/staff within the same institution or, it can be demonstrated that the facility(s) being lost no longer cater(s) for current or future needs of these groups. This approach recognises that qualitative student accommodation needs may change over time, enabling support for proposals with a net loss when the replacement accommodation to be provided is of a higher quality (for example the provision of individual rooms with communal facilities or ensuite facilities).

13.31 The policy requires new student schemes for student accommodation to demonstrate that they have entered into a formal agreement with at least one existing educational establishment within Greater Cambridge providing full-time courses of one academic year or more; confirming that the proposed accommodation is suitable in type, layout, affordability and maintenance regime for the relevant institution. The Council will seek appropriate controls to ensure that, within academic terms, the approved schemes are occupied solely as student accommodation for an identified institution. The restriction on occupation for undergraduate or postgraduate accommodation by full-time students enrolled on courses of at least one academic year does not apply outside term-time and ensures the opportunity for use of the accommodation for conference delegates or summer

language school students, while providing more long-term student accommodation when needed.

13.32 For students not attending full-time courses of one academic year or more, their accommodation requirements will be expected to be provided: within the site of the institution which they attend; by making effective use of existing student accommodation within Cambridge city outside term time; or by use of home-stay accommodation. This is because in nearly all cases part-time and non-university education institutions students either reside in their parental home, their own home, in homestay accommodation or can be accommodated in existing PBSA during the vacation periods (¹CCHPR, 2017). By using existing stock efficiently, non-university institution students do not increase the overall pressure on the housing market. This is achieved by this group using existing PBSA owned by other institutions during the holidays (e.g. university accommodation), or by making homestay arrangements for students.

13.33 Accessibility by public transport for students is also important to consider, as the majority of students in purpose-built accommodation do not usually have access to cars. Where possible, it is desirable to house students (undergraduate students in particular) and academic staff close to the community, communal and pastoral facilities of their higher education provider.

13.34 Affiliated Institutions for the purposes of this policy are the Animal Health Trust, Babraham Research Institute, British Antarctic Survey, Cambridge Assessment, Cambridge Crystallographic Data Centre, Cambridge University Press, European Bioinformatics Institute (European Molecular Biology Laboratory), Faraday Institute, MRC Laboratory for Molecular Biology, National Institute Agricultural Botany, Sanger Institute, the Wellcome Trust, The World Monitoring Conservation Centre, Woolf Institute, or such other affiliations as may be agreed in writing with Cambridge City Council or South Cambridgeshire District Council.

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¹ Assessment of Student Housing Demand and Supply for Cambridge City Council, Cambridge Centre for Housing and Planning Research, January 2017.

Additional alternative approaches considered

13.35 None.

Response to issues raised in representations

13.36 In response to the concern about counting self-contained accommodation towards the overall housing requirement for Greater Cambridge, no changes have been made to the policy approach. The needs of the student population are reflected within the area's local housing need, therefore any new units are counted towards meeting this need. Student accommodation provided either as self-contained units or bedspaces will contribute towards delivering the overall housing requirement for Greater Cambridge.

13.37 In response to the specific comments raised about the location of student accommodation, the proposed policy already supports such development in an appropriate location for the institution it is intended to serve and is therefore sufficiently flexible to afford support for new student accommodation in both the city centre and directly adjacent to existing/ proposed educational establishments. The councils recognise the growth needs of the two large universities (The University of Cambridge and Anglia Ruskin University) and other educational institutions within Cambridge City and more widely Greater Cambridge which has been locally evidenced.

13.38 In response to feedback that visitor parking should be provided due to uses associated with student accommodation, while the policy approach for all new student development will require new development to be in locations well served by sustainable modes of transport, the potential for impacts on other local parking provision are noted. The policy will require all new proposals for student accommodation to demonstrate that they do not detract from local amenity, including parking provision, therefore the need for amenities such as visitor/disabled parking would be considered on a case-by-case basis.

13.39 The suggestion made by Anglia Ruskin University for the policy to be more flexible in relation to an individual sites use, rather than individual sites effectively

required to remain in their current general residential or student use, is already consistent with the policy approach. The policy provides for a range of student needs, whilst ensuring that any loss of student accommodation is balanced with the need to provide accommodation to meet the needs of existing higher education institutions. The policy supports development which releases private housing back onto the local housing market which is currently tied to an educational institution, and which also contributes towards delivering the overall housing requirement.

Therefore, no change in policy approach is proposed.

13.40 While there has been no significant change in the overall policy intent from First Proposals, the policy has been amended to apply a criteria-based approach applied to student accommodation provided specifically for postgraduate, academic staff and academic visitors, which has been informed by updated evidence and precedent use of conditions in developments containing student accommodation.

Further work and next steps

13.41 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence, changes to national or local policy and any matters arising from continued engagement with higher education providers.

14. Policy H/DC: Dwellings in the countryside

Issue the plan is seeking to respond to

14.1 South Cambridgeshire is a predominantly rural district with an attractive and much valued open environment. As a result, the area is prone to speculative proposals that could constitute unsustainable development.

How the issue was covered in the First Proposals consultation

14.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/DC: Dwellings in the countryside

14.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

14.4 There have been no changes to the national or local policy context from that which informed the First Proposals, and is set out in the Homes Topic Paper (2021).

Summary of issues arising from First Proposals representations

14.5 There is support for the principle of the dwellings in the countryside policy from some Parish Councils and the Cambridge and South Cambridgeshire Green Parties. Additionally, Pembroke College state the policy would provide flexibility for development in countryside whilst ensuring the setting is not adversely affected. Cambridge Past, Present & Future suggest a need for clarification in the supporting text on the meaning of replacement dwelling in the green belt not being 'materially larger', and Parish Councils suggest dwelling density in the countryside should differ from that in towns and cities, and prioritising agricultural, low paid, essential and rural workers.

14.6 KWA Architects object to the policy, requiring wording changes to extensions in the Green Belt taking account of the permitted development precedent, occupancy of rural workers dwellings allowing family-living rights, and a three year limit on temporary dwellings for new rural businesses.

14.7 Historic England has concerns over reuse of buildings in the countryside highlighting that any proposals need to consider the historic environment and that heritage assets may form part of the local heritage of an area. Whilst Steeple Morden Parish Council stress the importance of ensuring structures are sound, Croydon Parish Council comment that dwellings should remain contiguous with villages, and Gamlingay Parish Council state that stand-alone annexes should be refused permission to limit number and sprawl into open countryside.

14.8 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

14.9 N/A

Additional alternative approaches considered

14.10 No additional approaches considered.

Draft policy and reasons

14.11 The draft policy can be viewed in the Local Plan.

14.12 South Cambridgeshire is a predominantly rural district with an attractive and much valued open environment. The policy uses a range of criteria to control development in a way that supports rural communities, reduces unsustainable living patterns and minimises the carbon impacts of new housing.

Response to issues raised in representations

14.13 Parish Councils raised a number of issues, sometimes based on local experiences. Proposals for new annex accommodation will have to meet the criteria

set out in Policy H/DC: Dwellings in the countryside. Criterion 5a is clear that extensions must not create a separate dwelling or be capable of separation from the existing dwelling and criterion 2 requires that replacement dwellings are on a one for one basis.

- 14.14 It is agreed that housing densities are likely to be lower in the countryside than in towns and cities. Most proposals where Policy H/DC: Dwellings in the countryside is an important factor will be for single dwellings and are likely to involve much lower densities than typically found in urban areas. However, the suggestion that proposals should be contiguous with village boundaries is impractical as by definition the policy is largely concerned with sites in the countryside and many will be some distance from village boundaries.
- 14.15 The call for dwellings to be prioritised for agricultural, low paid, essential and rural workers over commuters is addressed through criteria 6-9 which support the development of dwellings to meet the needs of rural based enterprises. However, it would be inappropriate and impractical to focus other parts of the policy, such as extensions and replacement dwellings, on these groups.
- 14.16 The suggestion that structures should be of sound build is supported through criterion 1b (re-use of buildings) and criterion 5b (extensions to dwellings).
- 14.17 Historic England's concerns that the re-use of buildings element of the policy should consider the impact on the historic environment is partially addressed through criteria 1c and 1d. Additionally, proposals will have to comply with the plan as a whole including policies with a specific focus on protecting the historic environment.
- 14.18 The requirement for replacement dwellings in the green belt to be not materially larger than the one they replace reflects national green belt policy and each case will need to be judged on its own merits. Previous plans have attempted to use a 'percentage uplift' approach to controlling proposals but this proved difficult to operate.

14.19 The policy wording regarding extensions in the green belt is consistent with the wording in the NPPF (paragraph 154c). The supporting text in the policy is also clear that in determining what constitutes 'a disproportionate addition' account will be taken of the extent to which the dwelling could be extended under permitted development rights.

14.20 The concern that dwellings to support rural based enterprises should be restricted to single workers is not recognised. It is wholly reasonable that where a worker who needs to be on site requires a family home that this is allowed. Each case should be treated on a case by case basis and the applicant should explain why the type of dwelling proposed is required when the planning application is submitted.

14.21 Temporary dwellings to support a rural based enterprise may be permitted for up to 3 years where more time is needed to demonstrate the viability of a business. A concern was expressed whether this was long enough, but it is considered that up to 3 years provides an appropriate time length to test the viability of a business.

Further work and next steps

14.22 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

15. Policy H/RM: Residential moorings

Issue the plan is seeking to respond to

15.1 Residential moorings are an existing part of the housing provision within Cambridge and South Cambridgeshire. Houseboats meet the housing requirements of some groups whilst also contributing to the diversity and supply of different forms of housing in the area. It is important to have a policy within the Greater Cambridge Local Plan so that there are clear requirements for any new moorings so as to take account of the different river users, houseboat occupiers and any neighbouring uses.

How the issue was covered in the First Proposals consultation

15.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/RM: Residential moorings

15.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

15.4 There have been no changes to the national or local policy context from that which informed the First Proposals, and is set out in the Homes Topic Paper (2021)

Summary of issues arising from First Proposals representations

15.5 There was support for addressing provision from Huntingdonshire District Council. The Cambridge and South Cambridgeshire Green Parties highlight the need for engagement, and for provision of appropriate facilities.

15.6 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople, Bargee Travellers, and other caravan and houseboat dwellers for Cambridge and South Cambridgeshire

15.7 The Accommodation Needs Assessment (ANA) recommends that the new Local Plan has a similar criteria based policy to Cambridge's adopted Local Plan Policy 54 that will apply across Cambridge and South Cambridgeshire, allowing for further residential moorings to be considered favourably if all the criteria have been met. The ANA found no specific need for more residential moorings.

Additional alternative approaches considered

15.8 No additional approaches considered.

Draft policy and reasons

15.9 The draft policy can be viewed in the Local Plan.

15.10 The Local Plan needs to set out how the Councils will consider proposals for new residential moorings so that proposals which meet the relevant criteria will be considered favourably. The criteria will ensure that new moorings are provided in suitable locations with appropriate infrastructure and will not have significant negative impacts on matters such as landscape and townscape, local amenity and navigation of the river.

Response to issues raised in representations

15.11 Concern that issues with current provision should not be replicated in any new provision has been addressed through criterion 1h which requires that the design of new moorings is appropriate for the intended use and issues such as flood risk and manoeuvrability have been considered. The Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople, Bargee Travellers, and other caravan and houseboat dwellers identified limited demand for additional residential moorings but the stakeholder engagement did call for any additional moorings to be supported by investment in facilities to address current deficiencies.

Further work and next steps

15.12 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.



16. Policy H/RC: Residential caravans

Issue the plan is seeking to respond to

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

How the was issue covered in the First Proposals consultation

16.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/RC: Residential caravan sites

16.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

16.4 There have been no changes to the national policy context from that which informed the First Proposals and is set out in the Homes Topic Paper (2021).

<u>Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and Annexes 1-8</u>

16.5 The Greater Cambridge Housing Strategy 2024-2029 was published before the 'Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople and Bargee Travellers and other caravan and houseboat dwellers for South Cambridgeshire and Cambridge' (September 2024) was published. Therefore, it recognised that the Councils would need to plan how any identified needs will be met but was not able to provide more detail as the level and nature of need was still uncertain.

Summary of issues arising from First Proposals representations

16.6 The Cambridge GRT Solidarity Network and Cambridge and South Cambridgeshire Green Parties raised concerns regarding sufficient provision of sites and the effective assessment of need. The Environment Agency highlight the importance of addressing flood risk.

16.7 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople, Bargee Travellers, and other caravan and houseboat dwellers for Cambridge and South Cambridgeshire (September 2024)

16.8 The Accommodation Needs Assessment (ANA) identified that there are currently 267 residential caravans on 11 residential caravan parks in South Cambridgeshire and 47 residential caravans on 2 residential caravan parks in Cambridge. Responses were only received from 3 park owners/managers. These responses highlighted that caravans are mostly occupied by couples over 55 and/or retired people and that there are limited vacancies on the parks. There are no waiting lists for places and no evidence was provided which indicated a need for more caravan parks.

Additional alternative approaches considered

16.9 No additional alternative approaches identified.

Draft policy and reasons

16.10 The draft Local Plan does not include a specific policy for residential caravans. Instead, proposals for residential caravans and park homes will be considered against the policies applicable to residential developments in general. However, it is recognised that some criteria will not be appropriate for assessing proposals for residential caravans. There will be no requirement for custom and self-build and residential caravans will not have to meet residential space standards or accessible homes standards.

- 16.11 Residential caravan parks have a role in contributing to a range of different housing options for people. However, they are a very small part of the housing mix and there is no evidence of a need for more. This conclusion is based on an ANA which specifically addressed the need for residential caravans and park home sites. Therefore, there is no case for allocating specific sites.
- 16.12 The considerations for residential caravans and park homes are not significantly different to other residential developments, and it is therefore considered practical to assess them against the same criteria as other proposals for residential development. However, each proposal will need to be assessed on its own merits against these criteria. This means that the greater flood risks faced by residential caravans and park homes will be an important consideration and that requirements such as the residential space standards and accessible homes standards will be waived where appropriate.

Response to issues raised in representations

- 16.13 One respondent suggests we review the vulnerability of tenure but did not provide details on the nature of the vulnerability. However, the government has published a collection of resources on park homes including information on buying and selling park homes, fees and other payments, and site rules. These are considered to come under the jurisdiction of environmental health and are not considered to be matters of planning policy.
- 16.14 Another respondent suggests the policy should distinguish between mobile home parks and caravans on farms used by seasonal agricultural workers. All proposals for residential caravans will be assessed against the same criteria as other proposals for residential development. However, each proposal will be assessed on its own merits. In certain limited circumstances caravans for seasonal workers can benefit from permitted development rights. However, they will often still be subject to other licensing requirements beyond the jurisdiction of planning.

16.15 One respondent highlights that caravans and mobile homes are particularly vulnerable to flood risk. However, the draft Local Plan already has a robust flood risk policy (Policy CC/FM: Managing Flood Risk) which takes account of climate change. Each proposal will be assessed on its own merits and proposals for residential caravans and park homes will need to demonstrate that they have addressed flood risks in a manner appropriate to the development proposed.

Further work and next steps

16.16 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

17. Policy H/GT: Gypsy and traveller pitches and travelling showpeople plots

Issue the plan is seeking to respond to

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

How the issue was covered in the First Proposals consultation

17.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites

17.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

Planning Policy for Traveller Sites (PPTS, December 2024)

17.4 The new PPTS includes a number of changes that relate to the delivery of Gypsy and Traveller pitches and / or Travelling Showpeople plots:

- widens the definition of Gypsies and Travellers to include those that have ceased to travel permanently and to refer to "all other persons with a cultural tradition of nomadism or of living in a caravan" (annex 1, paragraph 1),
- widens the definition of Travelling Showpeople to include those that have ceased to travel permanently (annex 1, paragraph 2), and
- adds a footnote to set out relevant exceptions to when local planning authorities should very strictly limit new pitches or plots in open countryside away from existing settlements or allocations (paragraph 26 / footnote 9).

<u>Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and</u> Annexes 1-8

17.5 The Greater Cambridge Housing Strategy 2024-2029 sets out that both Councils are keen to support other housing options, such as Gypsy/Traveller sites, where there is clear supporting evidence of need.

Summary of issues arising from First Proposals representations

17.6 A number of organisations highlight the importance of provision of sites, and ensuring those sites are suitable, such as having access to facilities, and appropriate foul drainage. Best practice examples are highlighted. One developer expresses concerns regarding the provision of sites as part of major developments.

17.7 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople, Bargee Travellers, and other caravan and houseboat dwellers for Cambridge and South Cambridgeshire (September 2024) and Addendum (2025)

17.8 An Accommodation Needs Assessment (ANA) has been undertaken by Arc4 (on behalf of Cambridge City Council and South Cambridgeshire District Council) to consider the accommodation needs of Gypsies and Travellers, Travelling Showpeople, boat dwellers and other caravan dwellers. The ANA calculates Gypsy and Traveller pitch and Travelling Showpeople plot requirements in Greater Cambridge.

17.9 The ANA and its Addendum conclude that for 2023/24 to 2044/45 there is:

- a minimum need for 157 additional permanent pitches for Gypsies and Travellers within South Cambridgeshire,
- a potential need for 2 pitches for Gypsies and Travellers within Cambridge
 - based on national data, but that there is no specific evidence of need,

- a need for 20 additional permanent plots for Travelling Showpeople within South Cambridgeshire, and
- no specific evidence of need for Travelling Showpeople plots within Cambridge.

17.10 The ANA makes a number of recommendations on what should be considered to help meet the identified need for Gypsies and Travellers and Travelling Showpeople within South Cambridgeshire. It also recommends that the new Local Plan has a criteria based policy to inform any future planning applications for Gypsy and Traveller pitches and Travelling Showpeople plots.

Additional alternative approaches considered

17.11 No additional alternative approaches identified.

Draft policy and reasons

17.12 The draft policy can be viewed in the Local Plan.

Further information supporting draft policy approach

17.13 Our evidence recommends that the new Local Plan has a criteria based policy to inform any future planning applications for Gypsy and Traveller pitches and Travelling Showpeople plots. The adopted Cambridge and South Cambridgeshire Local Plans 2018 already include criteria based policies, and these policies have been combined to create this draft policy. The policy criteria have been reviewed in light of changes to national planning policy for travellers, and the policy has been drafted in the context of there being national and local planning policies that already cover Green Belt and flood risk.

17.14 National planning policy for travellers sets out that the government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community. It also requires local authorities to ensure that traveller sites are sustainable (economically, socially and environmentally), and to

very strictly limit new traveller sites in open countryside that is away from existing settlements.

- 17.15 The draft policy provides specific criteria to be considered for any new proposals for Gypsy and Traveller pitches or Travelling Showpeople plots in Greater Cambridge, to ensure that they are located in suitable and sustainable locations, whilst providing sufficient flexibility to respect the interests of both the travelling and settled communities.
- 17.16 Our evidence shows that there is a need for additional Gypsy and Traveller pitches and Travelling Showpeople plots within Greater Cambridge, but that there are also existing vacant pitches and pitches that are not being occupied by those meeting the definition of a Gypsy and Traveller. It is therefore important that any new pitches or plots that are proposed demonstrate a clear need for the new pitches or plots, and provide details on how the proposed residents meet the definition of a Gypsy and Traveller or Travelling Showperson.
- 17.17 Good design is a key aspect of sustainable development, and whilst most Gypsy and Traveller sites are predominantly residential uses, Travelling Showpeople sites include a mix of residential and non-residential uses. The draft policy provides specific design criteria to ensure that the design and layout of any new sites provide healthy, safe and secure living conditions for their occupants.
- 17.18 Strategic sites provide an opportunity to deliver Gypsy and Traveller pitches, alongside other types and tenures of housing, to ensure that new communities meet the needs of different groups in sustainable locations with access to services and facilities. New communities that accommodate both Gypsies and Travellers and the settled community allow for the different land uses to be considered in a co-ordinated and integrated manner through the masterplanning and design process.
- 17.19 Information on how the specific requirements for strategic sites have been developed is set out within the Strategy Topic Paper (2025).

Response to issues raised in representations

17.20 There are suggestions that additional sites should be allowed in a range of locations with access to facilities, to provide choice for future residents. The Local Plan as a whole seeks to direct new homes to sustainable locations with the least climate impact, active and public transport options, and near to jobs, services and facilities, and national planning policy states that local planning authorities should very strictly limit new pitches or plots in the open countryside away from existing settlements. The draft policy allows for new pitches or plots to be delivered in a range of locations provided that a series of criteria are met.

17.21 There are concerns regarding the provision of sites as part of major developments, however, strategic sites provide an opportunity to deliver Gypsy and Traveller pitches, alongside other types and tenures of housing, to ensure that new communities meet the needs of different groups in sustainable locations with access to services and facilities. It is therefore important that both allocated and unallocated strategic sites are required to provide serviced land to accommodate Gypsy and Traveller pitches so that this land use can be considered, alongside the other land uses, within the masterplanning and design process.

17.22 There are suggestions for additional site considerations. National planning policy for travellers sets out specific considerations for the design of sites or yards, and these are reflected in the requirements set out in this draft policy. Specific requirements in relation to Green Belt and flood risk have not been included in this policy, as these are set out in national planning policy and also included within Policy GP/GB: The Cambridge Green Belt and Policy CC/FM: Managing Flood Risk of the Local Plan. The policy requires the provision of essential utilities including drainage and sewerage, and other policies in the Local Plan will also apply to any proposals such as Policy CC/IW: Integrated Water Management, Sustainable Drainage and Water Quality.

Further work and next steps

17.23 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.



18. Policy H/CH: Community-led housing

Issue the plan is seeking to respond to

18.1 The Local Plan needs to be clear how any proposals for community-led housing in Greater Cambridge will be considered. Community-led housing is where local people and community groups work together to design and deliver new housing. There are a range of delivery models and several community-led housing groups operating in Greater Cambridge.

How the issue was covered in the First Proposals consultation

18.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: Policy H/CH: Community-led housing

18.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail:

Homes Topic Paper

Policy context update

National Planning Policy Framework (NPPF, December 2024)

18.4 The new NPPF adds a number of references to community-led housing, including:

- that local authorities should seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing (paragraph 73b),
- that local planning authorities should support the development of exception sites for community-led development on sites that would not otherwise be suitable as rural exception sites, and that these sites should include one or more types of affordable housing and that a proportion of market homes may be allowed (paragraph 76), and

 that planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led housing (paragraph 82).

<u>Greater Cambridge Housing Strategy 2024-2029: Homes for Our Future and</u> Annexes 1-8

18.5 The Greater Cambridge Housing Strategy 2024-2029 confirms that the Councils remain committed to supporting community led housing. The Councils do not have land available for community led housing at a reduced price. However, groups will be signposted to support available, whether financial or other means. The strategy also requires that community led housing proposals are assessed against the general housing policies within the current Local Plans and be aligned to Neighbourhood Plans where relevant. Where development is outside of the defined development extent (previously known as the development framework boundary) within South Cambridgeshire, schemes will be considered under the existing Exception Sites policy. National policy requires that the landlord for affordable housing for rent (other than Build to Rent schemes) should be a Registered Provider. However, the strategy confirms exceptions will be considered where community led groups, such as Community Land Trusts, come forward with affordable housing schemes for local people, and can demonstrate that the homes will be properly managed and maintained.

Summary of issues arising from First Proposals representations

18.6 There were few comments on this policy but they were broadly supportive. It was argued that community-led housing should be seen as part of a broader package of affordable housing options but there were differing views on how community-led housing should relate to rural exception sites. There was a suggestion that the policy could adopt the proposed approach to custom and self build homes whereby 5% of dwellings on larger sites should be set aside for community-led housing.

18.7 Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

New or updated evidence base

Housing Needs of Specific Groups Update for Greater Cambridge (2025)

18.8 The Housing Needs of Specific Groups study identifies the potential of community led housing to contribute to diversifying the housing market. The study recognises that whilst the scale of community led housing in Greater Cambridge is limited there are a number of groups actively seeking sites to develop.

Eastern Community Homes

18.9 Eastern Community Homes (ECH) is a not-for-profit regional partnership established to promote and enable community led housing across the East of England. Due to the end of dedicated funding, the ECH partnership is no longer actively delivering services. However, the organisations that formed ECH remain committed to supporting community-led housing and continue to offer services individually where possible. Their website provides details of 10 community led housing groups in Greater Cambridge that are either managing community led housing or seeking sites for development. Those focused on South Cambridgeshire are village based Community Land Trusts targeting local housing needs. Those focused on Cambridge are a mix of Community Land Trusts and co-housing groups which sometimes have a thematic focus such as religion, the environment or homelessness. Only four of the groups currently have completed housing stock that they are managing.

18.10 There will also be a range of other community led housing groups in Greater Cambridge that have not received support from ECH. For example, we are aware of five housing cooperatives operating in Cambridge. Proposals are progressing for two to-housing groups in Northstowe. There are also several almshouse charities operating across Greater Cambridge.

Additional alternative approaches considered

18.11 No additional alternative approaches identified.

Draft policy and reasons

18.12 The draft Local Plan does not include a specific policy for community led housing. Instead, proposals for community led housing developments will be considered against the policies applicable to residential developments in general.

18.13 The Councils continue to support community led housing as a means to provide homes for local people through public support and community ownership. Much community led housing is also affordable housing. This could be in the legal sense of affordable housing or simply market housing that is more affordable through the use of, for example, sweat equity. Community led housing is essentially about local people working together to address local housing issues. There should be meaningful community engagement and consent throughout the development process and those involved form a not-for-profit community group or organisation to own, manage or steward the homes in a manner of their choosing. This is often done with a Registered Provider but is not necessary. However, the benefits to the local area and/or specified community must be clearly defined and legally protected in perpetuity. Therefore, community led housing can best be seen as a process rather than a particular type of housing. It can include a range of housing models such as Community Land Trusts, co-housing, cooperative housing and group self-builds. In some cases, almshouse charities could also be seen as another type of community led housing.

18.14 Community led housing can help to diversify the local housing market and meet specific community needs that cannot be met by more mainstream housing options. However, because community-led housing is considered to be a way of delivering housing developments rather than a specific type of housing the considerations for these housing developments are no different to other residential developments.

18.15 Other housing policies in the draft Local Plan do support community led housing. It is anticipated that both Policy H/ES: Exception sites for affordable housing and Policy H/CB: Self and custom build homes will support housing developments that are community led.

18.16 There are a number of examples of community led housing developments that have progressed within the existing policy framework. The Marmalade Lane cohousing scheme in Orchard Park began to be occupied in 2018. Two further cohousing schemes are being progressed at Northstowe supported by the landowner Homes England. One group, Suvana, is grounded in Buddhist values whilst the second group, Northstowe Cohousing, is a secular community united by a desire to live more sustainably, sociably and cooperatively. Both are likely to comprise around 40 homes and include a mix of market and discounted market sale homes and are being co-designed with potential occupants. The Great Shelford Parochial Charities added a further 21 almshouses to its stock in 2022-23 utilising the rural exception site policy. The Girton Town Charity redeveloped a site it already owned, inside the settlement boundary, to deliver 15 new almshouses for people aged 55 and over. This scheme was also completed in 2022-23.

Response to issues raised in representations

18.17 There was support for the broad concept of community led housing with various suggestions for policy detail. Community led housing can play an important role in the housing market by meeting local and specific needs that cannot be readily addressed through more mainstream or large scale delivery models. However, it is important that community led housing is not built in inappropriate locations or displaces other more appropriate housing schemes. Assessing community led housing proposals against the policies applicable to residential developments in general provides a level playing field. Policies to support exception sites and custom and self build will also provide opportunities to deliver more community led housing but not at the expense of other more valid proposals.

18.18 It was suggested that the community led housing policy should mirror the custom and self build policy. To an extent this will happen as self build community led housing proposals will be supported by the custom and self build policy where appropriate. However, it is not proposed to introduce a 'percentage policy' where, for example, all schemes over 20 or more dwellings are required to deliver 5% of these as community led housing. This could have the consequence of concentrating

community led housing within larger scale developments when most groups are seeking a more rural location or a site with specific characteristics often related to a community of interest. Larger scale development proposals could include a community led housing element where demand is identified, potentially as part of their affordable housing requirement. However, it is anticipated that the majority of community led housing proposals will come forward as windfall sites.

18.19 It was argued that the plan must be clear about which policies will apply to community led housing developments. Community led housing proposals will be considered against the same criteria as other housing proposals which should aid clarity. It is not proposed to introduce policy based exceptions as this could lead to poor quality development. Where there are viability or other reasons why it is not appropriate to apply certain criteria or policies to a specific proposal these should be justified in the same way that other residential proposals would be required to.

Further work and next steps

18.20 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

Appendix 1: Evidence to support the case for applying the Nationally Described Space Standards to new residential development in Greater Cambridge

The purpose of the planning system is to contribute to the achievement of sustainable development including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. Achieving sustainable development includes social objectives which foster well designed, beautiful and safe places that support communities' health, social and cultural well-being (National Planning Policy Framework (NPPF), December 2024).

Research such as the RIBA 2011 report <u>The Case for Space: the size of England's new homes</u> highlights that sub-standard space in homes can result in adverse impacts on health and well-being and the educational outcomes of children, and generate public health costs.

On 25 March 2015, a Ministerial Statement introduced steps to streamline the planning system, including ways to deliver high quality, accessible and sustainable new homes. To achieve this, the Government introduced optional technical standards for new housing. Since 2015, many local authorities including Cambridge City Council and South Cambridgeshire District Council, have justified the need for internal space standards, by reference in the Local Plans to the <u>nationally described space standards (NDSS)</u>. The policy approach within each adopted Local Plan is explained in further detail below.

This study justifies the continued application of the NDSS to new dwellings within the emerging Greater Cambridge Local Plan, and supports the preparation of a sound and robust policy approach.

Policy context

National policy

Paragraph 135 of the NPPF 2024 requires that "planning policies and decisions should ensure that developments create places that are safe inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users ...". Footnote 51 explains that "Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.".

The Planning Practice Guidance

Housing: Optional Technical Standards

The Planning Practice Guidance (PPG) includes <u>Housing: optional technical</u> <u>standards</u> which was published on 27 March 2015. The optional technical standards state that "Where a local planning authority ... wishes to require an internal space standard, they should only do so by reference in their Local Plan to the <u>Nationally Described Space Standard</u>". The optional technical standards states that "... local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- need evidence should be provided on the size and type of dwellings
 currently being built in the area, to ensure the impacts of adopting space
 standards can be properly assessed, for example, to consider any potential
 impact on meeting demand for starter homes.
- viability the impact of adopting the space standard should be considered as
 part of a plan's viability assessment with account taken of the impact of
 potentially larger dwellings on land supply. Local planning authorities will also
 need to consider impacts on affordability where a space standard is to be
 adopted.
- timing there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."

Nationally Described Space Standards

Paragraph 1 of the <u>Nationally Described Space Standard</u> (NDSS) explains that it "deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height".

From 6 April 2021, changes to the General Permitted Development Order (GDPO) came into force which require that new dwellings delivered through permitted development rights must meet the NDSS. Therefore, for the purposes of this appendix, it is accepted that permitted development such as the conversion of Use Class E (commercial, business and service uses) to Use Class C3; and the conversion of Use Class C3 to Use Class C4 (small House in Multiple Occupation) will be required to meet the NDSS.

In conclusion, when taken together, national planning policy and guidance allow for (where there is justification) local plan policies to require NDSS for all new dwellinghouses, across all sizes, types and tenures. Case law including the *Gravesham Borough Council v Secretary of State for the Environment* (1982) and more recently the London Borough of Brent v Secretary of State for Levelling Up, Housing and Communities & Anor [2022] EWHC 2051 (Admin) (29 July 2022) has been used to support the definition of the term 'dwellinghouse', and therefore supports the application of NDSS to any new dwellinghouse (meeting the Gravesham tests) notwithstanding whether it falls into Use Class C3, Use Class C4 or Sui Generis. The following sections examine the approaches taken by the adopted Cambridge City and South Cambridgeshire Local Plans with regard to justification of policies requiring NDSS for new dwellings.

Local Policy

Cambridge Local Plan 2018

Policy 50 of the adopted <u>Cambridge Local Plan 2018</u> states that: "New residential units will be permitted where their gross internal floor areas meet or exceed the residential space standards set out in the Government's Technical Housing Standards – nationally described space standard (2015)."

The supporting text to Policy 50 explains: "The provision of sufficient space within new homes is an important element of good residential design and new dwellings should provide sufficient space for basic daily activities and needs. ... These standards are applicable for both private and affordable housing in Cambridge as they cover a full range of dwelling types and consider the amount of space needed by residents within their dwellings. ... The standards are intended to encourage provision of enough space in dwellings to ensure that homes can be used flexibly by a range of residents. The standards also aim to ensure that sufficient storage can be integrated into units."

In addition, the supporting text for Policy 48: Housing in Multiple Occupation (HMO) states: "It is also important to ensure that HMOs provide a standard of accommodation equivalent to that enjoyed by other residents. ... Policy 50: Residential space standards will therefore be aspired to for proposals of change of use to HMOs and should also be applied to the provision of new HMOs. ... This not only ensures reasonable living conditions for occupiers, but will also ensure that the intensification of such activity associated with any HMO is proportionate to the size of the property.".

Cambridge City Council's justification for the requirement of NDSS for new dwellings was set out in Matter CC6 – March 2017. Paragraphs 125 – 130 of the matter statement explain:

- 68 different house-types/applications were assessed.
- Whilst some of the assessed schemes coming forward in the city were considered to meet or exceed the proposed standards, many failed to meet the standard.
- As a result the Council resolved to bring forward a policy on residential space standards to address those developments within Cambridge that are still providing sub-standard accommodation.
- The Council commissioned an update to its viability work to assess the
 potential impact of the Government's nationally described space standards. It
 showed that the nationally described space standards would be unlikely to
 impact on the viability of development in Cambridge.

Paragraph 128 of the Matter Statement explained that with regard to "timing of introduction of the nationally described space standards, the development industry is aware of the Council's intention to introduce minimum internal space standards. Whilst the Council originally intended to introduce standards as set in the Cambridge Local Plan 2014: Proposed Submission, the nationally described space standards are not significantly different. All stages of plan making for the emerging Local Plan have included questions, issues and options, or policies pertaining to internal space standards."

South Cambridgeshire Local Plan 2018

The South Cambridgeshire Local Plan Policy H/12 also applies the NDSS and states: "New residential units will be permitted where their gross internal floor areas meet or exceed the Government's Technical Housing Standards – Nationally Described Space Standard (2015) or successor document ...".

Evidence to support the requirement for the NDSS was set out in <u>Evidence for Residential Space Standards in South Cambridgeshire</u>. The Council measured the gross internal area, bedroom sizes, built-in storage space, and ceiling heights of 115 new homes across 36 approved developments within the district. A range of scheme sizes across different geographies were selected.

The results of the research are presented in paragraphs 14 – 27 of the evidence-base document. The Council found that due to a significant proportion of new dwellings not meeting the NDSS, the Council considered that there was a clear justification and need in South Cambridgeshire for a policy requiring all new homes to meet or exceed the national space standards. Updates to the Council's viability evidence also supported the policy approach by stating "viability is certainly no worse and would not ... jeopardise development coming forward across the City or District".

Finally, as with the Cambridge Local Plan, the Council considered that the introduction of space standards had been consulted on at length, and the development industry had been aware for some time that the Council intended to

introduce internal space standards, therefore no transitional provisions were necessary.

Emerging Greater Cambridge Local Plan

The Greater Cambridge Local Plan is currently being prepared and has been through the following preparatory stages:

- 2019 Call for Sites
- 2020 First Conversation Consultation
- 2021 First Proposals Consultation

The First Proposals Consultation included two policies which reference the need to require NDSS for new dwellings. These policies were prepared in the context of the current policies within the Cambridge and South Cambridgeshire Local Plans. More recently the Greater Cambridge Housing Strategy 2024 – 2029 and emerging evidence in relation to under-occupancy rates of larger family homes further supports and justifies the requirement for NDSS in new dwellings. These factors are covered in more detail below.

The First Proposals Consultation included the following proposed policy wording relating to NDSS:

Policy H/SS: Residential space standards and accessible homes

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

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

Policy H/MO: Houses in multiple occupation (HMOs)

"We propose that all new larger HMOs (sui generis use which require planning permission) will be required to meet the nationally described residential space standards"

Consultation responses to the First Proposals consultation

A summary of responses received in relation to Policy H/SS is provided below:

- General support for the policy.
- The Council should provide viability evidence to justify the requirement for NDSS.
- Identification that student accommodation should not be covered by the policy, and that NDSS does not apply to Use Class C2.

There were no responses to the consultation on Policy H/MO in relation to the requirement that new larger HMOs (sui generis use) will be required to meet the NDSS.

In response to the First Proposals Consultation, the next step is to provide further evidence to support and justify policies H/SS and H/MO. The following section explains the methodology used to test the policy approach against the three tests set out in Paragraph: 020 Reference ID: 56-020-20150327 of Housing: Optional Technical Standards.

Residential space standards: evidence base for Greater Cambridge

The evidence to support the policies for NDSS in the adopted Local Plans for Cambridge and South Cambridgeshire undertook reviews of planning permissions by measuring the gross floor areas of different dwelling types including storage and individual bedrooms. This was necessary because the information was not readily available as there was no policy requirement to provide the information prior to the current Local Plans being adopted. However, since both Local Plans were adopted in 2018, planning applications have had to demonstrate that they meet space standards, or if they do not, explain why. Therefore, it is possible to assess the

effectiveness of the current space standards policies by referring to officer reports on planning applications.

Benefiting from Development Management Officer assessments of all planning applications against the NDSS, a review of 113 planning applications and related decisions has been undertaken. The assessment uses a typology approach to ensure an assessment of a wide range of residential development types. Table 1 sets out the housing typologies which were covered to ensure a broad and varied sample.

Table 1: The sampling framework for assessing applications in Greater Cambridge

Variable	Categories				
Local Authority	Cambridge, South Cambridgeshire				
Area type	Urban, Edge of Cambridge, New Settlements, Rural				
	Centres, Minor Rural Centres, Group Villages and Infill				
	Villages				
Development type	Demolition, Re-build (housing), Change of use,				
	Conversion of dwelling, New build				
Development class	Estate (9+ dwellings), Group (3-8 dwellings), Infill (1-2				
	dwellings), Residential conversion, Residential change				
	of use, Replacement dwelling				
Type of site	Brownfield, Greenfield, Garden				
Type of application	Full, Reserved matters, Outline, Prior approval				
Specific types of	Retirement living, Rural exception scheme, Custom &				
scheme	self-build				
Tenure and type of	Market, Affordable, Home in Multiple Occupation,				
dwelling	House, Flat				

Most planning applications and related decisions reviewed were for full or reserved matters but some outline applications and related decisions were also reviewed to understand how space standards were dealt with at this stage. The date of the outline permission in relation to the adoption of the relevant Local Plans was also important as it determined whether reserved matters applications needed to comply with the nationally described space standard.

Applications reviewed were identified within the monitoring years:

- 2021-22
- 2022-23
- 2023-24

Research findings: need

The study found that approximately 80% of all planning applications and related decisions analysed complied with the NDSS, as required by the Cambridge and South Cambridgeshire Local Plans. Table 3 to this study presents details of these planning applications and related decisions.

Approximately 7% of the planning applications and decisions analysed were submitted as outline applications. Of these, all were granted planning permission and the Decision Notices included conditions that required the reserved matters application(s) to comply with the NDSS. Table 4 lists these planning applications and related decisions.

In total, only 3% of applications met the requirements of the NDSS 'in part'. Of these, all were granted planning permission. However, it is notable that in these cases, the proposals fell short of the NDSS by a minimal amount (in one case only 0.1m² below the standard). Table 5 lists these planning applications and related decisions.

Finally, only approximately 10% of planning applications and related decisions assessed did not meet the NDSS requirements. Therefore, they were not compliant with Policy 50 of the Cambridge Local Plan, or Policy H/12 of the South Cambridgeshire Local Plan. Out of the 10% of planning applications that did not meet the NDSS, 3 applications were refused for not meeting the NDSS or for unacceptable living conditions with regard to outlook. These applications and related decisions are listed in Table 6.

The remainder of the applications were granted planning permission despite noncompliance with the NDSS. These are listed in Table 7 and a summary of the reasons for granting permission is provided below:

- Development was assessed as having a good standard of amenity, thereby meeting policy objectives, and is in a highly sustainable location.
- Applications were for specialist temporary modular accommodation for single homeless people. Despite not meeting internal space standards, the applications were allowed for the following reasons:
 - Intended occupiers would be single individuals as per the Housing First Model.
 - Given the intended occupants, the internal footprint proposed would limit up-keep and potential for overnight guests whilst still providing a sufficient amount of space, and to a good quality for a single person.
 - There is a critical and urgent need for this type of housing which provides supported, yet independent accommodation away from a hostel environment or emergency housing which is often not suitable for the intended occupiers.
- The outline permissions were approved before the adoption of the Local Plans in 2018 and therefore do not have conditions attached relating to the need to meet residential space standards, so the reserved matters applications are not required to meet NDSS.
- Officers considered that the NDSS did not apply to residential conversions.

In summary, the research has demonstrated that since the introduction of the NDSS through Policy 50 and Policy H/12 in 2018, the majority of planning applications in Greater Cambridge already comply with the NDSS. This is in contrast to applications received prior to 2018. Furthermore, the research has shown that the policies are being applied flexibly, in particular where specific housing types and accommodation needs justify an alternative approach to the size of the accommodation; or where the proposal meets the objectives of the NDSS overall. Nevertheless, it is clear that the NDSS has been used as a benchmark by which planners assess the quality and standard of accommodation against other material considerations.

Need – a note on changing space requirements

The results of the research summarised above shows that since the introduction of Policies 50 and H/12 in 2018, the majority of planning applications for new dwellings in Greater Cambridge are now meeting the NDSS requirements. In itself, this is an important factor in justifying the continuation of this policy approach.

However, it is important to emphasise that further evidence exists to support the continued policy approach. In particular, societal trends mean that many older people are looking to downsize to enable them to continue living independently. They need adequate storage and good room sizes to achieve this. This is particularly so where older people have mobility issues which require greater circulation space.

Furthermore, the Covid-19 pandemic saw a significant change in living patterns with many more people working from home and therefore requiring greater space. The demand for a spare bedroom has increased. However, higher house prices have limited the affordability of buying extra rooms for many households. Changes to rented affordable housing has also resulted in households choosing to downsize to avoid the spare room subsidy ('bedroom tax'). This has exacerbated the requirement to ensure rooms are a sufficient size to meet their needs and homes with a greater number of bedrooms are not sought to compensate for compromises in design.

Table 2 below is taken from the Housing Needs of Specific Groups in Cambridge and South Cambridgeshire (Iceni, 2025). The report states that "some 88% of all owner-occupiers have some degree of under-occupancy". The report undertakes the same analysis for social and private rented sectors and finds "in both cases there are more under-occupying households than overcrowded, but differences are less marked ...".

Table 2: Cross-tabulation of occupancy rating and number of bedrooms (owner occupied sector) in Greater Cambridge

Occupancy Rating	1-bed	2-bed	3-bed	4+-bed	Total	
+2 spare bedrooms	0	0	16,039	25,374	41,413	
+1 spare bedrooms	0	9,779	8,230	3,959	21,968	
0 "Right sized" bedrooms	2,268	2,395	2,572	514	7,749	
-1 too few bedrooms	92	237	236	148	713	
Total (of all occupancy	2,360	12,411	27,077	29,995	71,843	
rating types)						

Source: Census (2021)

Alongside the preparation of the Local Plan, the Councils have published the Greater Cambridge Housing Strategy 2024-2029 'Homes for Our Future' which identifies the following trends which are relevant to the requirement for applying NDSS:

- There is an 'affordability gap' with middle income households struggling to meet their needs through either home ownership or rental markets.
- Households buying bigger houses or staying in larger homes to compensate
 for the small sizes of the rooms results in increasing under-occupation and
 reducing levels of downsizing. This results in an undersupply of family sized
 homes and contributes to low levels of affordability in the area.

In summary, given the successful application of NDSS policies in both Cambridge and South Cambridgeshire since 2018, the continued application of a policy requiring the NDSS is justified. The continued application of this policy is further justified given under-occupancy rates and the 'affordability-gap' existing in the Greater Cambridge area.

Viability

As already noted, viability testing as part of both the adopted Cambridge and South Cambridgeshire Local Plans showed that a policy requiring new homes to meet the nationally described space standard would not have an impact on the viability of proposed developments. The research set out above supports this in that the majority of applications assessed complied with the NDSS.

This viability work has been revisited and re-tested as part of the emerging Greater Cambridge Local Plan. A <u>viability assessment</u> was produced in August 2021, and an updated viability report has been produced in 2025 to support the draft plan. The NDSS was applied as the minimum standard to all scheme typologies for all appraisals. Development scenarios tested have been demonstrated to be viable when applying these standards alongside other policy requirements.

Timing

Planning Practice Guidance suggests "there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions". However, a space standard policy has been adopted across Greater Cambridge since 2018 through the current Cambridge Local Plan and South Cambridgeshire Local Plan, so it is considered that no transitional period is required.

Meeting the Planning Practice Guidance tests

As set out above, the Greater Cambridge Local Plan's emerging policies include:

- Policy H/SS: Residential Space Standards and Accessible Homes
- Policy H/MO: Houses in Multiple Occupation

The evidence supports Policy H/SS by showing that the majority of developments for new residential dwellings meet the requirements of the NDSS. The exceptions to this are shown to be where planning applications are for specialist accommodation meeting a specific need.

With regard to Policy H/MO, the amendments to the GDPO which came into effect in April 2021 mean that conversions of Use Class C3 to Use Class C4 (small HMO) through permitted development are required to meet the NDSS. With regard to conversions of Use Class C3 to larger HMOs which fall under Use Class Sui Generis, the evidence provided in Table 3 shows that in most cases, planning applications for larger HMOs are meeting the NDSS, and where they are not, planning applications are assessed against the NDSS as a benchmark to consider living standards and design quality.

The Planning Practice Guidance states that justification for including the NDSS in a Local Plan should address the issues of need, viability and timing. This study addresses each of these and concludes that the continued requirement to meet the NDSS in the Greater Cambridge Local Plan is justified.



 Table 3: Planning permissions compliant with NDSS

App Ref	Site/ Address	Development	Application type	Date of
		type		permission
23/04257/FUL	Rear of 56 Cherry Hinton Road, Cambridge	Change of use	Full	05/01/2024
23/00199/FUL	145 Perne Road, Cambridge	Change of Use	Full	26/09/2023
23/01966/PRIOR	13 - 14 Burleigh Street, Cambridge	Change of Use	Prior Approval	14/07/2023
22/01144/FUL	338 Cherry Hinton Road, Cambridge	Change of use	Full	15/07/2022
22/04045/FUL	171-181 Newmarket Road, Cambridge	Change of use	Full	28/02/2023
23/04347/FUL	Joist Farm, Long Drove, Waterbeach	Change of use	e of use Full	
23/01658/PRIOR	24B Orchard Road, Melbourn	Change of Use	Prior Approval	28/06/2023
22/02407/PRIOR	Flittons Farm, 78-80 Station Road, Steeple	Change of use	Prior Approval	13/07/2022
	Morden			
23/02034/FUL	2A North Brook End, Steeple Morden	Change of Use	Full	26/09/2023
21/04087/FUL	Former Barrington Cement Works,	Change of use	Full	07/08/2024
	Haslingfield Road, Barrington			
22/02192/FUL	New England Barn, New England Farm	Change of use	Full	22/07/2022
	Road, Tadlow			
24/02508/PRIOR	Grange Farm, Bourn Road, Caxton	Change of use	Prior Approval	28/08/2024
22/04461/FUL	77 Mill Road, Cambridge	Conversion of	Full	19/01/2023
		Dwelling		

App Ref	Site/ Address	Development	Application type	Date of
		type		permission
22/04473/FUL	45-47 Woodlark Road, Cambridge	Conversion of Full		04/01/2023
		Dwelling		
23/01118/FUL	63 Middle Watch, Swavesey	Conversion of	Full	26/05/2023
		Dwelling		
22/03538/FUL	1 Emmanuel Road, Cambridge	House in Multiple	Full	22/12/2022
		Occupation		
18/2013/FUL	78 Arbury Road, Cambridge	House in Multiple	Full	14/12/2022
		Occupation		
22/04561/FUL	68 Garden Walk, Cambridge	House in Multiple	Full	08/12/2022
		Occupation		
22/05148/FUL	31 Gisborne Road, Cambridge	House in Multiple	Full	06/02/2023
		Occupation		
22/03736/FUL	39 Bridewell Road, Cambridge	House in Multiple	Full	31/10/2022
		Occupation		
22/02162/FUL	315 Milton Road, Cambridge	House in Multiple	Full	11/04/2023
		Occupation		
23/01846/FUL	155 Hills Road, Cambridge	House in Multiple	Full	17/07/2023
		Occupation		

App Ref	Site/ Address	Development	Application type	Date of
		type		permission
22/05049/FUL	46 Perne Road, Cambridge	House in Multiple	Full	22/06/2023
		Occupation		
24/01227/FUL	627-631 Oakley Lodge, Newmarket Road,	House in Multiple	Full	23/05/2024
	Cambridge	Occupation		
24/01141/FUL	7 Thorleye Road, Cambridge	House in Multiple	Full	17/06/2024
		Occupation	_	
22/02969/FUL	73 Newmarket Road, Cambridge	New Build	Full	08/12/2022
22/01157/FUL	Land adjacent to 1 Greville Road, Cambridge	New Build	Full	13/05/2022
22/02008/FUL	70 Water Street, Cambridge	New Build	Full	04/09/2022
22/01837/FUL	32 Ramsden Square, Cambridge	New Build	Full	07/07/2022
21/04431/REM	Darwin Green One, BDW2 Huntingdon Road,	New Build	Reserved matters	26/07/2022
	Cambridge			
21/05433/REM	Darwin Green One, BDW4 Huntingdon Road,	New Build	Reserved matters	22/12/2022
	Cambridge			
22/02646/REM	Land at Newbury Farm, Babraham Road,	New Build	Reserved matters	30/08/2023
	Cambridge			
21/04036/REM	Lots S1 And S2, North West Cambridge	New Build	Reserved Matters	07/10/2022
	(Eddington)			

App Ref	Site/ Address	Development	Application type	Date of
		type		permission
22/04785/REM	Parcel 2.1, Cambourne West	New Build	Reserved Matters	18/07/2023
21/02310/REM	Phase 2B, Northstowe	New Build	Reserved Matters	26/10/2021
21/02902/FUL	The Former Bishops Site, Cambridge Road, Impington	New Build	Full	24/06/2022
21/03955/FUL	Land south of Babraham Road, Sawston	New Build	Full	25/08/2022
21/05453/FUL	85 High Street, Sawston	New Build	Full	13/04/2022
22/03740/FUL	55 Narrow Lane, Histon	New Build	Full	03/11/2022
22/04704/REM	Land adjacent to Merton Hall, Smithy Fen, Cottenham	New Build	Reserved Matters	07/02/2023
22/04303/REM	Land between Haverhill Road and Hinton Way, Stapleford		Reserved Matters	12/05/2023
21/00915/REM	Land to the rear of 1B Over Road, Willingham	New Build	Reserved Matters	23/11/2022
20/03700/FUL	39 Pierce Lane, Fulbourn	New Build	Full	16/03/2021
22/04076/FUL	Land north west of 8A Little Heath, Gamlingay	New Build	Full	02/12/2022
22/01913/FUL	Land to the rear of 151 to 155 High Street, Melbourn	New Build	Full	05//03/2022

App Ref	Site/ Address	Development	Application type	Date of
		type		permission
20/05199/REM	Ida Darwin Hospital, Fulbourn Old Drift,	New Build	Reserved Matters	30/04/2022
	Fulbourn			
20/01209/FUL	Land at Chrishall Road, Fowlmere	New Build		01/02/2021
20/01356/FUL Land adjacent to The Green House, Cootes		New Build	Full	13/04/2022
	Lane, Fen Drayton			
23/00610/FUL	32 Fowlmere Road, Foxton	New Build	Full	19/07/2023
22/00553/FUL	Land adjacent to 100 High Street, Great	New Build	Full	04/04/2022
	Abington			
21/03438/FUL	Land at 147 St Neots Road, Hardwick	New Build	Full	01/09/2022
22/03448/FUL	71 Willingham Road, Over	New Build	Full	10/11/2022
21/02624/FUL	13 Royston Road, Harston	New Build	Full	09/09/2022
22/02495/FUL	39 Capper Road, Waterbeach	New Build	Full	12/08/2022
20/02595/FUL	Land adjacent to 28 Harston Road, Newton	New Build	Full	09/06/2022
22/05539/REM	Firs Farm, St Peters Street, Caxton	New Build	Full	30/03/2023
22/05075/FUL	Land adjacent to 20 Royston Road, Litlington	New Build	Full	31/01/2023
22/00440/FUL	Land at Tedder Way, Cambridge	New Build	Full	26/01/2023
22/02745/FUL	157 Coldhams Lane, Cambridge	New Build	Full	12/08/2022
22/03686/FUL	24 Mingle Lane, Stapleford	New Build	Full	05/01/2023

App Ref	Site/ Address	Development	Application type	Date of
		type		permission
22/03818/FUL	13 Victory Way, Cottenham	New Build	Full	21/12/2022
22/00741/FUL	21 Church Street, Gamlingay	New Build	Full	03/01/2023
22/00595/FUL	Land at the back of 136-138 High Street,	New Build	Full	16/06/2022
	Harston			
22/02319/FUL	88 North End, Bassingbourn Cum	New Build	Full	03/08/2022
	Kneesworth			
21/03681/FUL	42 West Drive, Highfields Caldecote	New Build	Full	16/02/2023
22/03296/FUL	9A Hauxton Road, Little Shelford	New Build	Full	08/12/2022
22/01754/FUL	55 High Street, Toft	New Build	Full	27/07/2022
21/02759/FUL	Colville Road Phase 3, Cherry Hinton,	Rebuild (Housing)	Full	08/07/2022
	Cambridge			
22/01995/FUL	Aylesborough Close, Cambridge	Rebuild (Housing)	Full	28/02/2023
22/03584/REM	51 - 55 Elizabeth Way, Cambridge	Rebuild (Housing)	Reserved matters	03/11/2022
19/1324/FUL	102 - 108 Shelford Road, Cambridge	Rebuild (Housing)	Full	17/06/2022
21/05405/FUL	19 Grantchester Road, Newnham, Cambridge	Rebuild (Housing)	Full	26/04/2022
22/02067/FUL	1A Fendon Road, Cambridge	Rebuild (Housing)	Full	26/08/2022
22/01638/FUL	72 High Street, Cherry Hinton, Cambridge	Rebuild (Housing)	Full	11/07/2022
21/00537/FUL	29 High Street, Chesterton	Rebuild (Housing)	Full	11/10/2021

App Ref	Site/ Address	Development	Application type	Date of
		type		permission
21/05276/FUL	2 Station Road, Great Shelford	Rebuild (Housing)	Full	06/04/2022
22/03169/FUL	36 Leeway Avenues, Great Shelford	Rebuild (Housing)	Full	14/10/2022
22/03763/FUL	4 The Lakes, Twentypence Road, Cottenham	Rebuild (Housing)	Full	15/02/223
22/01375/FUL	6 Collier Way, Stapleford	Rebuild (Housing)	Full	07/07/2022
22/04011/FUL	The Bungalow, Haden Way Willingham	Rebuild (Housing)	Full	17/03/2023
21/03885/FUL	7 West Green, Barrington	Rebuild (Housing)	Full	29/06/2022
22/04590/FUL	39 Cambridge Road, Oakington	Rebuild (Housing)	Full	29/12/2022
22/04784/FUL	39 New Road, Guilden Morden	Rebuild (Housing)	Full	13/01/2023
23/00306/FUL	15 Shepreth Road, Barrington	Rebuild (Housing)	Full	24/03/2023
20/03394/FUL	2 High Street, Harston	Rebuild (Housing)	Full	07/02/2023
22/03455/FUL	6 Chishill Road, Heydon	Rebuild (Housing)	Full	02/11/2022
22/04533/FUL	Northgate Farm, High Street, Horningsea	Rebuild (Housing)	Full	24/02/2023
23/01699/FUL	31 Frogge Street, Ickleton	Rebuild (Housing)	Full	28/06/2023
22/04922/FUL	28 West End, Whittlesford	Rebuild (Housing)	Full	17/02/2023
22/04689/FUL	73 The Lamb Yard, High Street, West	Rebuild (Housing)	Full	10/08/2023
	Wratting			

Table 4: Outline planning permissions where conditions were applied to the decision notice with a requirement for reserved matters application(s) to comply with NDSS

App Ref	Site/ Address	Development type	Application type	Date of permission
22/01281/OUT	Land at 14-16 Hauxton Road, Cambridge	New Build	Outline	27/05/2022
20/01972/OUT	Netherhall Farm, Worts Causeway, Cambridge	New Build	Outline	07/01/2022
20/03598/OUT	Land west of Station Road, Longstanton	Rebuild (Housing)	Outline	11/07/2022
20/02171/OUT	Northstowe Phase 3A	New Build	Outline	25/03/2022
23/01377/OUT	Land south west of 85 to 91 Rampton Road, Cottenham	New Build	Outline	31/10/2023
23/02905/OUT	Land between 1-3 and 5-9 The Cinques, Gamlingay	New Build	Outline	14/05/2024
23/02932/OUT	Land south of Willingham Green Road, Carlton	New Build	Outline	11/01/2024
S/3854/19/OL	Digital Park, Station Road, Longstanton	Rebuild (Housing)	Outline	11/07/2023

 Table 5: Planning permissions that met NDSS in part and reason for decision

App Ref	Site/ Address	Development	Application	Date of	Development management
		type	type	permission	assessment summary
22/01168/REM	Lot 4, North West	New Build	Reserved	07/06/2022	All units meet or exceed NDSS except
	Cambridge		Matters		two 2-bed 3-person apartments which are
	(Eddington)				0.1 sqm below the standard.
21/00423/FUL	Barns at Merton	Change of	Full	14/06/2022	Plot 2 - bedroom 2 is slightly below the
	Farm, Church End,	use			required minimum floor area for a
	Gamlingay				bedroom with 2-bed spaces.
21/00759/FUL	35 Knutsford Road,	Change of	Full	24/09/2024	Whilst the internal floor area for Flats 7-
	Bassingbourn Cum	Use			10 are slightly below residential space
	Kneesworth				standards, these are already existing and
					are not subject to the proposed
					conversion. All other flats, with the
					exception of Flat 5, conform to residential
					space standards Policy H/12. Flat 5 is 1
					sqm short of NDSS.

Table 6: Applications not meeting NDSS and reason for refusal

Planning	Site Name	Description	Decision	Reason
Reference			Date	
24/00447/FUL	31 Fairfax Road,	Change of use from 6bed	Refused	In conflict with policy 48 and 50 of the Local
	Cambridge	HMO to large 7bed HMO	30/04/24	Plan.
		(7 persons)		
23/02430/FUL	627-631 Oakley	Creation of additional 4	Refused	The internal space allocations were found
	Lodge,	No. HMO Rooms	13/10/2023	to be below the acceptable threshold as
	Newmarket Road,			prescribed under the Nationally Described
	Cambridge			Space Standards and this formed one of
				the reasons for refusal.
23/03193/FUL	2 The Grove,	Erection of 1no. adjoining	Refused	The appeal was dismissed on the grounds
18/10/2023	Cambridge	dwelling formed as an	18/10/2023	of unacceptable living conditions with
		extension to the existing	Appeal	regard to outlook from the bedroom.
		dwelling	dismissed	However, Inspector concluded no conflict
			02/09/2024	with the objectives of Policy 50, regarding
				space standards.

Table 7: Applications not meeting NDSS and reason for approval

Planning	Site Name	Description	Date of	Reason
Reference			Permission	
22/04356/FUL	185-189	Conversion and extension	05/05/23	The proposal redevelops a site with a good
	Newmarket Road	to deliver retail and 12 1-		standard of amenity leading to a
	and 1 Godesdone	bed residential		sustainable use of land in a highly
	Road, Cambridge			sustainable location.
20/03501/FUL	Land at Barnes	Construction of 6 No.	17/03/21	Transitional accommodation for single
	Close, Cambridge	modular homes.		homeless people with assured shorthold
				tenancies starting at 6 months, with the
				option of staying for up to 12-18 months.
				Conflict with Policy 50 but justification that
				the units would provide a good quality living
				environment for the intended occupiers.
19/1048/FUL	Land to the north	Siting of 5 temporary	11/11/19	Conflict with Policy 50. However,
	of Christ The	homes to provide		justification for the units being below the
	Redeemer	accommodation for		minimum standard and that the units would
	Church,	homeless people together		still provide a good quality living
	Newmarket Road,	with 1 temporary home for		environment for those intended to occupy
	Cambridge	a warden/key worker		the units.

Planning Reference	Site Name	Description	Date of Permission	Reason
22/04745/REM	Parcel 1.5, Cambourne West	41 dwellings, including affordable housing, associated hard and soft landscaping and all ancillary works.	23/05/2023	Outline permission granted before Local Plan adopted so no NDSS requirement.
20/02543/REM	Parcels 1.3a and 1.3d, Cambourne West	150 dwellings including affordable dwellings	06/05/2021	Outline permission granted before Local Plan adopted so no NDSS requirement.
22/01382/FUL	Barn 2, Rectory Farm, New Road, Guilden Morden	Conversion of existing agricultural building to a dwellinghouse (Class C3 residential)	25/07/2022	The principle of development has already been established through the granting of prior approval for the conversion of the agricultural building which pre-dated the change to GPDO. Therefore, considering this fallback position that the existing building can be converted into residential use within the same footprint no further adjustments have been sought in terms of the internal arrangement or floor area.

Planning	Site Name	Description	Date of	Reason
Reference			Permission	
23/00943/FUL	53 Church Street,	Split No 53 into two semi-	26/05/2023	The officer's report notes that the
	Thriplow	detached bungalows		residential space standards required under
				Policy H/12 of the Local Plan do not apply
				to conversions. Therefore, the application is
				acceptable.
21/04957/FUL	Emmaus	Erection of 6 modular	03/03/2022	As the proposed units do not comply with
	Cambridge,	homes		policy H/12 which would normally be
	Green End,			applied to conventional housing, it is
	Landbeach			essential that any permission be subject to
				controls to ensure the units are used for the
				specific specialist purpose proposed
				(namely occupied by homeless people in
				accordance with the Housing First Initiative
				Criteria).
22/04819/FUL	44 Mill Hill,	Divided into 2 dwellings as	24/01/2023	The NDSS is not applied because the new
	Weston Colville	originally built along with		dwelling would be housed within this
		proposed 1st floor rear		existing building on the historic footprint.
		extension		

