

Consultation Statement

Appendix 13: Response to Representations - Homes



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026)



GREATER CAMBRIDGE
SHARED PLANNING

Summaries of Draft Plan Representations, and Response to Main Issues

Raised: Homes

Homes Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is support for the homes policies, particularly the commitment to delivering an appropriate mix of housing types and tenures. However, there are concerns that homes should not be used as short-term rentals or purchased by international investors, when they are needed to provide affordable housing.

Specific comments have been made relating to:

- securing genuinely affordable housing, including for young families, older people and for NHS staff and healthcare providers,
- delivering smaller homes (rather than family homes) and accessible homes for older people such as bungalows,
- designing homes to ensure health and wellbeing for residents, whilst ensuring they remain affordable and viable,
- understanding the market for self and custom build homes,
- balancing the different types of accommodation, for example there is a request for student accommodation to be capped and a suggestion that co-living developments will be provided at the expense of other forms of housing,

- the relationship between policies and the draft NPPF,
- need for a co-housing policy and greater support for community-led housing, and
- ensuring proportion requirements for information and evidence to be provided with planning applications.

Other comments have been made relating to housing density, car parking requirements, sustainable design and construction, housing requirements for neighbourhood areas, defined development extents, the development strategy, site allocations, additional sites and cultural infrastructure.

Response to main issues raised in representations:

The support for the homes policies is noted, and the policies set out within this chapter aim to secure the delivery of a mix of sizes, types and tenures of homes across Greater Cambridge, including affordable housing, homes to rent and buy, homes for a range of groups in the community from students to older people to travellers, and homes that are designed with internal and external spaces that are functional, comfortable and accessible.

In earlier stages of the plan-making process the Councils did suggest that a policy relating to community-led housing, including co-housing, would be included in the Local Plan. However, as set out in the [Homes Topic Paper \(2025\)](#), community led housing can best be seen as a way of delivering housing rather than a specific type of housing, and therefore it was not considered necessary to include a specific policy when the considerations for community-led housing developments (including co-housing) are no different to any other residential developments. The Councils continue to support community led housing as a means to provide homes for local people through public support and community ownership, and the housing policies in the Local Plan do not prevent community-led housing from being brought forward.

The requirements set out within the homes policies relating to the submission of information and evidence as part of the planning application process are proportionate and reasonable, and have been included to ensure that decisions can be made.

Responses to comments relating to specific homes policies are included within the responses to the individual policies, and our responses to comments relating to policies within other chapters of the Local Plan are included within the responses to those policies or chapters, including comments on proposed allocations.

Comments on the development strategy and approach to defined development extents villages are addressed under those policies. The development strategy was developed following consideration of a range of options, and evidence regarding their relative sustainability. This included alternatives such as release of land from the green belt, further village development, or development near to existing railway stations.

Housing density has been considered in the Great Places theme. Policies support higher densities in accessible areas, where parking can be reduced. The approach to car parking in the Infrastructure theme acknowledges that in less accessible areas there will still be a need for appropriate provision.

Comments advocating the importance of cultural provision have been made under a number of the plans themes. The plan addresses these issues through the Wellbeing and Great Places themes, in addition to supporting the plan with further evidence on this issue.

Table of representations:

Topic	Summary of issues raised in comments	Comments highlighting this issue
Homes	Support for the homes policies.	203410 (Cambridge City Council Liberal Democrat Group)
Homes	Welcome commitment to delivering an appropriate mix of housing types and tenures, and the acknowledgement of important role of employer led housing.	204918 (Innovate Cambridge)
Homes	Regulate short-term rentals (e.g. Airbnb) to enable local people to find affordable homes. Ensure that homes are not used for tourists, and are retained for residents.	202669 (R Page), 203280 (J Palmer)
Homes	More emphasis on ensuring that homes are not purchased by international investors.	203280 (J Palmer)
Affordable housing	Support requirement for 40% affordable housing.	205568 (Cambridge Living Streets)
Affordable housing	Support Cambridge City Councils commitment to council house building.	205568 (Cambridge Living Streets)
Affordable housing	Developers must be held to affordable housing targets.	201043 (P Spowart)
Affordable housing	How many of the thousands of new homes will be genuine social rent? The number of houses planned far exceeds the social housing waiting list, but how likely is it that this list will be reduced to zero?	203255 (Cambridge Friends of the Earth)
Affordable housing	Affordability of house prices and rents is a problem.	201043 (P Spowart), 203276 (J Palmer)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Affordable housing	Need to consider provision of affordable housing specifically for NHS staff and health care providers to support recruitment and retention. Affordable housing needs for NHS staff should be included in housing needs assessments.	205169 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Affordable housing	Need to prioritise increasing the supply of social housing, and should require 25% affordable housing and 25% social housing on all development schemes.	203738 (Cambridge Green Party)
Affordable housing	Specific split of affordable housing tenures does not allow flexibility to respond to changing circumstances over the lifetime of a development, and no wording that allows for exceptions that have been secured on other strategic sites.	209035 (Marshall Group Properties)
Rural exception sites	Support for Rural Exception Sites and First Homes sites to provide housing for young families and specialist homes for an ageing population.	203064 (Little Wilbraham and Six Mile Bottom PC)
Housing mix	Do not need more family houses, instead need affordable homes of 1-3 beds for singles, couples, downsizers, and those looking for first home to rent or buy.	201043 (P Spowart)
Housing design	If houses are designed to last 25 years, who will buy with a mortgage if the house is worthless at the end.	205504 (D Brown)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Internal space standards	Need to consider residents mental health, provide additional space for working at home, and communal workspaces to mitigate loneliness.	208873 (R Lambert)
External space standards	Concern that requirement for balconies as integral element of building design may impact on the viability of affordable housing.	202665 (Mole Architects)
Accessible and adaptable homes	Question feasibility of M4(3) lift requirements for small apartment buildings – suggest exceptions should be allowed based on site specific circumstances where justified by viability and / or practicality.	202665 (Mole Architects)
Specialist housing for older people	Need for bungalows/housing that is accessible for older people other those with disabilities and in turn these developments need to be the most accessible - close to hospitals, regular public transport, communal social spaces, and access to physical activities.	210598 (Cambridgeshire County Council)
Self and custom build homes	Need better enforcement of self and custom build homes. Is there a genuine market for them?	202665 (Mole Architects)
Co-living	Co-living policy may lead to sub-standard accommodation. Concern that support for co-living will increase the cost of	202665 (Mole Architects)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	land, and that will be provided at expense of other forms of housing.	
Student accommodation	Ensure that homes are not purchased for use by students, which is distorting the property market against the interests of residents. Student numbers are capped in Oxford because of concerns the University is becoming too dominant.	203280 (J Palmer)
Dwellings in the countryside	Concern that Policy H/DC includes requirements that are not consistent with draft NPPF.	202665 (Mole Architects)
Co-housing	Need a specific policy encouraging co-housing (not co-living) as there are environmental and community benefits to this approach, but it remains a rare form of housing.	202679 (C Pointon)
Community-led housing	Justification for providing greater support to community-led housing, and substantial weight should be given to exception sites which are led by legitimate local community groups provided that: they have general community support, will be well managed and viable over the long term, and any benefits from the scheme are retained by the local community in perpetuity.	202803 (Histon and Impington Community Land Trust)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Planning application requirements	Should emphasise that reports and initial information requirements must be proportionate to the scale of development. Requiring excessive technical reports at an early stage can be costly and high risk for SME developers, potentially discouraging the delivery of small sites. Where detailed information is necessary, it should be limited to what is reasonable and, where possible, secured through planning conditions rather than required at the point of submission.	209705 (NP Architects)
Housing density	Housing developments need to be denser – achieved by reducing car parking. Many people in Cambridge have no need for a car. Separate out housing and parking, and apply a fair cost to parking spaces for those that want one.	201739 (T Burford)
Housing density	Design homes using the Pinehurst Model, not Eddington accommodation blocks. "Pinehurst" refers to the 3-4 storey blocks of apartments off Grange Road. Built in the 1930s they are surrounded by lawns and mature trees.	210673 (Newnham Labour)
Car parking	Concerned about potential reductions in parking provision, and need to ensure net zero objectives do not unfairly impact on parking provision in rural communities. Policies	203064 (Little Wilbraham and Six Mile Bottom PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	aimed at reducing car usage should include reassessment of transport options in underserved villages.	
Sustainable design and construction	There is no mention of sustainability – what about high level insulation, solar panels, community heating, air source heat pumps, sustainable building methods and materials?	202436 (A Fisher)
Housing requirement for Neighbourhood Areas	The indicative figure of 90 dwellings for the non-Eddington portion of Girton should be adjusted to reflect that some of the population in 2021 lived in Eddington. Suggested that approximately 80 dwellings provides a more accurate estimate based on Census 2021 data.	206161 (Girton Neighbourhood Plan Team)
Defined development extents	Development extents limit meaningful expansion opportunities for villages.	203064 (Little Wilbraham and Six Mile Bottom PC)
Development strategy	Historical core, conservation areas and open spaces within Cambridge should not be further built on.	202669 (R Page)
Development strategy	Without an increase in housing, Six Mile Bottom risks further decline as it currently lacks amenities to sustain its population.	203064 (Little Wilbraham and Six Mile Bottom PC)
Development strategy	Support for housing proposals in Great Wilbraham that would allow for local residents to remain within the parish.	203064 (Little Wilbraham and Six Mile Bottom PC), 206562 (Great Wilbraham PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Development strategy	Need to: restrict development where water or sewage capacity is insufficient, prioritise the reuse of empty buildings, support mixed use developments, improve and maintain the evidence base on housing needs, and strengthen compliance with policies on major developments.	203738 (Cambridge Green Party)
Development strategy	Need to ensure that active travel is considered from the start, so that connections can be made to employment and leisure uses. Homes and jobs should be located in close proximity to encourage the shift to active travel.	205168 (B Nicolson)
Development strategy	Homes and jobs being located close to each other is especially important for those working unsocial hours – need adequate street lighting, good pavement quality, and pedestrian focussed crossings at desire lines.	205568 (Cambridge Living Streets)
Development strategy	Do not need more new settlements, that are very different places to villages. Need to ensure separation between new settlements and existing villages.	201175 (K Smith)
Development strategy	Planning for significant numbers of new homes and a new settlement adjacent to key employment sites and ambition to optimise East West Rail is supported.	204918 (Innovate Cambridge)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Development strategy	No housing has been allocated near the seven rural stations despite their ability to accommodate higher footfall – the GCLP should support higher density housing around these stations and work with the railway to improve services.	208033 (Railfuture East Anglia)
Development strategy	The conclusions of the updated Green Belt study, including grey belt land, will need to be considered. Green Belt boundaries should be re-examined in response to clear need for development.	208214 (Pigeon Land & LIH)
Development strategy	Object to non-residential development that is in excess of annual house building, as this would make existing environmental and transport problems worse.	208487 (C Johnson)
Site allocations	GCLP should ensure that smaller communities benefit from new developments, rather than being disadvantaged. Concerned will miss out on improvements to public transport and infrastructure due to being outside the new development, and about increased traffic from new developments.	203064 (Little Wilbraham and Six Mile Bottom PC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
Site allocations	Allocation policies should consider the need for affordable housing for NHS staff, especially near large healthcare employers.	205169 (NHS Cambridgeshire and Peterborough Integrated Care Board)
Site allocations	Cambridge East – the requirements for 10% specialist accommodation, and two travellers sites should be removed. For specialist accommodation, need flexibility in requirements to allow for changes over time in demographic change, market demand, and placemaking. For traveller sites, there is no evidence provided as to why strategic sites should deliver traveller sites (last in list of options from Arc4), and inappropriate use of land (would result in loss of 80-200 dwellings).	209035 (Marshall Group Properties)
Site allocations	Concerned about inadequate public transport connections from surrounding villages to proposed new railway station at Cambridge East.	203064 (Little Wilbraham and Six Mile Bottom PC)
Site allocations	Cambourne North – clear delivery targets should be established, with ambition to deliver individual parcels within 6 months (rather than 18 months as at West Cambourne). Alternative construction methods such as modular or	207073 (Cambourne TC)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	modern methods of construction should be actively encouraged to accelerate delivery.	
Site allocations	Cambourne North – opportunity should be taken to provide bungalows and smaller homes for older people. Shortfall of bungalows in Cambourne, and there is a lack of options for older residents who are capable of living independently but require smaller more manageable homes.	207076 (Cambourne TC)
Site allocations	Cambourne North – need to incorporate design features in homes that allow for future adaptations as residents needs change over time e.g. roofs ready for loft conversions, and double skinned garages for conversion to living accommodation.	207078 (Cambourne TC)
Site allocations	Cambourne North – would welcome further engagement on impacts of Cambourne expansion.	208226 (Bedford BC)
Site allocations	<p>Grange Farm – object due to:</p> <ul style="list-style-type: none"> • size • location • negative impact on surrounding villages • inadequate infrastructure e.g. capacity of medical services, capacity of education services, significant 	202076 (S Tiplady), 204729 (G Huskisson), 202080 (M Barry)

Topic	Summary of issues raised in comments	Comments highlighting this issue
	<p>water shortage, and capacity of transport infrastructure,</p> <ul style="list-style-type: none"> • building on prime agricultural land, and • proximity to M11 and rail services will attract commuters – will become a dormitory town. 	
Site allocations	<p>Cambourne's perimeter bridleway provides an excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably.</p>	204053 (S Rogers)
Additional sites	<p>Cambridge Science Park North – support the inclusion of this site as an allocation in the GCLP, but acknowledge that the development may increase local property prices so urge high affordable housing provision.</p>	205965 (Histon and Impington Community Land Trust)
Additional sites	<p>Land to the east of Fulbourn Road, Teversham – a Housing Needs Survey Report for Teversham has been undertaken.</p>	211480 (G Robinson and Partners)
Cultural infrastructure	<p>Support Cambridge Junction and Create Cambridge in ensuring that: cultural infrastructure is embedded throughout the GCLP, culture is treated with parity alongside other infrastructure, and Create Cambridge is engaged as an advisor / consultee on the Local Plan.</p>	205230 (J Walsh)

Policy H/AH: Affordable Housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There is support for requiring 40% affordable housing (and 50% affordable housing on land within the Green Belt) and that this requirement relates to both C2 and C3 housing. However, there are also requests for a higher or lower proportion of affordable housing to be secured overall and/or on greenfield vs brownfield sites, and calls for developers to be required to meet these targets. There is also an objection to the requirement for 40% affordable housing on Build to Rent and Co-living developments on the basis that it does not conform to national planning legislation and guidance. Histon & Impington PC request that the re-sale of affordable homes should be restricted, so that affordable homes cannot be re-sold at market value.

Cambridge Green Party calls for the policy to be renamed “affordable and social housing”, as the reference to only affordable housing obscures the need for social housing. There are also comments that the policy should refer to a broader range of affordable tenures, including discounted market homes and key worker housing. Cambridge Green Party also request that that exceptions are allowed when empty buildings are being re-used.

There are concerns that new affordable homes are not genuinely affordable, and comments highlight that affordability of house prices and rents is a problem in Greater Cambridge. Cambridge Green Party requests that the proportion of social rented homes is increased, however there are comments from developers and landowners that the specific split of tenures does not allow for: flexibility to respond to changing circumstances over the lifetime of a development, strategic sites to secure exceptions to this tenure mix, or older persons housing to take a more flexible approach where mixed tenure buildings can

create challenges. There are comments that the policy should explain why the affordable housing tenures change between developments of 10-14 dwellings and 15+ dwellings, and for the policy to remove or amend the tenure requirement for shared ownership properties as some providers do not have the ability to deliver this form of tenure.

The NHS Cambridgeshire and Peterborough Integrated Care Board request that the provision of affordable housing is specifically considered, and that their affordable housing needs are included in housing needs assessments. There are also calls for non-residential developments (including visitor accommodation) to make a financial contribution towards the provision of affordable housing. An almshouse charity has suggested that they should be exempt from the obligations in the policy.

Great Shelford and Stapleford PCs request that First Homes are not precluded from coming forwards, and that the relationship between Neighbourhood Plans and this policy is clarified.

The University of Cambridge and some Colleges have requested that the affordable housing requirement within student accommodation developments is made more flexible, and that exceptions should also be made for sites beyond their campuses. It has also been suggested that it is unclear how the 40% affordable housing contribution on student accommodation aligns with Policy H/SA, which proactively supports the provision of student accommodation and requires a formal legal agreement be entered into with at least one educational institution and to ensure the accommodation is retained for student occupation. Anglia Ruskin University contests the 40% affordable housing contribution on student accommodation developments on the basis of viability and requests that university-led student accommodation developments should be exempt.

Churchill Retirement Living with McCarthy and Stone have highlighted that the viability assessment is unclear as to what specialist housing models have been tested.

There are comments from housebuilders and Northstowe TC relating to the grouping or clustering of affordable homes, and

the need to consider their management and location within the development (including adjoining parcels), as well as requests for greater clarity on what constitutes “small groups or clusters”. There are also calls for the references to the nationally described space standards to be removed as they fail to recognise what is allowed and does not allow for meeting the most up to date needs.

Response to main issues raised in representations:

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. Our viability assessment 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.

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. National planning guidance states that 20% is generally a suitable benchmark for the level of Affordable Private Rent homes to be provided in any Build to Rent scheme, but that local authorities can set a different requirement if justified by evidence. Our viability assessment shows that the strong Greater Cambridge housing market will support 40% Affordable Private Rent in Build to Rent schemes, and

therefore this is the requirement set out in Policy H/AH for affordable housing on Build to Rent schemes. Our viability assessment also 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.

Section 5b of the policy requires new affordable homes to be available in perpetuity (wherever possible), and therefore through the planning process provisions will be secured to ensure that affordable homes are retained in perpetuity where it is possible to do this.

Affordable housing is defined in the glossary of the National Planning Policy Framework (2024), and this same definition is included in the Local Plan glossary. Affordable housing covers everything from social rented housing to discounted market sales housing, and therefore the policy already covers a wide range of affordable housing tenures and does not need to be renamed. National planning policy and guidance also already sets out requirements in relation to the reuse or redevelopment of vacant buildings, and how the affordable housing contribution should be calculated on these types of development. It is therefore not necessary to include exceptions within the policy for the re-use of empty buildings as this is already covered by national planning policy.

The Councils are aware that there is a high level of need for affordable housing in Greater Cambridge, and that a variety of tenures of affordable housing are needed to meet this need. The Councils are also aware that homes need to be genuinely affordable for residents, and therefore alongside securing the delivery of a wide variety of affordable homes to meet different types of households and household incomes, the Local Plan also contributes towards other factors that have an impact on affordability of housing such as energy efficient homes and reducing costs associated with commuting by locating homes close to places of work with opportunities for active travel or access to public transport.

The 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. Taking account of comments received and the need to prioritise social and affordable rented homes, amendments have been made to the policy to allow exceptions where developments provide a higher overall proportion of social and affordable rented homes, with no or a smaller proportion of shared ownership homes. Amendments have also been made to the supporting text to explain why there are different tenure mixes for developments of 10-14 dwellings and 15 or more dwellings. Deviations from the tenure mix set out in the policy will be considered, however evidence will need to be provided to justify the deviation proposed, and this is now set out in the supporting information.

The [Housing Needs of Specific Groups study \(2025\)](#) calculates the need for affordable housing 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. Our assessment will therefore already include the consideration of NHS workers where they fall within the income levels and sources of need. Affordable homes delivered will also be available to NHS workers where they meet the relevant eligibility criteria for the specific affordable housing tenure being provided.

The supporting information for J/VA sets out that where proposals for apart-hotels or serviced apartments are considered to fall within Use Class C3 or comprise sui generis uses which have the characteristics of a C3 use, such proposals will be assessed via relevant housing policies in the Local Plan. It also sets out that where apart-hotels and serviced apartment units fall under C1 or Sui Generis uses, the councils will take steps to ensure they will not be used for any other purpose. With regard to other non-residential developments, they are required to make planning contributions on a range of issues, including transport (via the proposed CIL), affordable employment space and skills.

Exemptions from the policy for specific providers, such as charities or particular developers, are not appropriate and are also not necessary due to the ability for proposals to provide evidence as part of the planning application process to demonstrate that a material consideration(s) exists to deviate from the policy.

Made Neighbourhood Plans and adopted Local Plans have the same weight in decision making, however, if there is any conflict between the policies in the two plans, the most recently adopted/made plan takes precedence in decision making.

Taking account of comments received relating to affordable housing on student accommodation developments, the policy requirement and supporting information have been amended to clarify that where student accommodation is delivered on buildings or land owned by the University of Cambridge, Anglia Ruskin University or a University of Cambridge College, the policy exempts such development from contributing towards affordable housing, as other types of housing would not normally be delivered in these locations. However, where student accommodation is brought forward on other sites, these could equally be suitable for other types of housing, and therefore it is important that such developments are required to contribute towards meeting our affordable housing need.

Within developments, the new affordable homes must be dispersed in small groups or clusters that: create an even distribution of affordable housing throughout the development as a whole, and when considered in combination with neighbouring developments; contain a mix of affordable housing tenures and a mix in the number of bedrooms; and are proportionate in size to the overall size of the development, having regard to the type and location of the housing being provided. An amendment to the supporting information has been made to set out that the Greater Cambridge Housing Strategy 2024-2029 includes specific requirements relating to the clustering and distribution of affordable housing.

Viability assessment ...

Section 5e of the policy sets out that social and affordable rent homes should be designed to accommodate different family

compositions by requiring a minimum number of bedspaces for the number of bedrooms provided. This does not conflict with the nationally described space standards (see Policy H/SS) or prevent developments from meeting the most up-to-date needs, but instead is seeking to ensure that occupancy of social and affordable rented homes can be maximised by ensuring that new affordable and social rented homes align with the Councils' Lettings Policies and Local Housing Allowance criteria.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support requirement for 40% affordable housing, and increased requirement on land within the Green Belt.	207749 (Whittlesford PC), 209036 (Marshall Group Properties), 209211 (Urban & Civic), 211223 (Terra Strategic), 211241 (Living Space Housing), 211466 (Hayfield Homes Construction Ltd)
Support for affordable homes policy - it is very important that these come forward as part of every relevant development. Developers should be expected to assess viability as part of the purchase of the site and at least 40% affordable is a key part of this.	203418 (Cambridge City Council Liberal Democrat Group)
Generally supportive of Policy H/AH. Council's assessment of affordable housing need points to a need to increase the housing requirement figure and identify further housing land to help reduce the level of acute need in Greater Cambridge.	208910 (Nightingale Land and Hill Residential Ltd)
More affordable housing should be provided.	205700 (Newnham Labour)

<p>Developers must be held to these affordable housing targets:</p> <ul style="list-style-type: none"> • enforcement is vital and not always achieved in the past, • viability and other arguments shouldn't be used to reduce affordable levels after permission granted. 	201044 (P Spowart), 201465 (S Smalley), 201019 (M Colville)
Affordable housing is not very affordable.	201351 (D Wood), 202867 (H Cook)
Fully applaud the strategic priority of including significant quantities of housing that is affordable to rent and to buy.	201779 (H Jackson)
The GCLP does not clearly explain: how affordability will be secured over time, what proportion will be social or genuinely affordable rent, or how local need will be prioritised. Undermines confidence that developments will support a balanced community.	208980 (J Williams)
First Homes are not precluded from coming forwards, and therefore the affordable housing policy should allow for them.	208103 (Great Shelford PC)
Although First Homes may not be suitable for most new developments in Greater Cambridge, the policy should not discourage their inclusion where appropriate.	201640 (Stapleford PC)
Support requirement for both C2 and C3 developments to contribute towards the delivery of affordable housing.	208103 (Great Shelford PC)
Commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing challenges.	203533 (Cambridge Ahead)
Affordable housing supported but only within villages, respecting Green Belt and settlement character. Affordable housing must reflect rural context and realistic delivery.	202255, 207163, 207164 (Girton PC)

<p>Support the policy and request additional requirements:</p> <ul style="list-style-type: none"> • Clause 5a should also require the re-sale of affordable homes be restricted such that it cannot be resold at market value, • When an application is received which does not meet the requirements, these must go to a public planning committee meeting and any justification for a site not meeting the requirement is to be made public where permission is granted, • Where an application does not provide affordable homes due to viability, a reassessment should be made if the build time exceeds 5 years from permission granted. 	<p>201436 (Histon & Impington PC)</p>
<p>This policy should be renamed “Affordable and Social Housing” and every mention of “affordable housing” in the policy’s introduction should be amended to “affordable and social housing.” A blanket focus on “affordable housing” obscures the acute needs of those who can only afford social rent, including low-income households and families facing homelessness.</p>	<p>203739 (Cambridge Green Party)</p>
<p>Housing should be a requirement on non-residential or employment sites to encourage mixed use developments, and where not appropriate, a commuted sum should be sought.</p>	<p>201506 (B Greig), 201869 (J Hurst), 205666 (D Storey), 207647 (Duxford PC), 207660 (K Holland), 201461 (J Neal), 205332 (T Neal)</p>
<p>Affordable housing requirements can influence development outcomes – consider applying affordable housing requirements to non-residential uses such as visitor accommodation to ensure most appropriate use of land.</p>	<p>207775 (Hilton Cambridge City Centre), 206937 (Concilio Communication)</p>

Affordable housing should not be allowed in the Green Belt whether 40% or 50% applied	201019 (M Colville)
Policy should be flexed to require more affordable housing on greenfield sites than brownfield sites	201463 (K Mak)
Unclear whether this policy applies to charitable almshouse associations providing exclusively affordable housing. It could act as a strong deterrent to developing more homes and, therefore, charitable almshouse associations should be exempt from obligations set out in this policy.	202096 (Great Shelford Village Charity)
Supportive of the policy but concerned about how to manage affordable housing requirements from adopted neighbourhood plans when they differ from the policy.	201640 (Stapleford PC)
Unclear how affordable housing requirements set out in adopted neighbourhood plans will be considered when they differ from this policy. Clarity should be added.	208103 (Great Shelford PC)
The requirement for affordable housing within student accommodation developments should be more flexible. The exception for developments within an existing university or college campus site should be extended to cover developments nearby to campus sites. It can be difficult to define the boundary of some University of Cambridge college sites.	202508 (University of Cambridge), 202048 (Trinity Hall), 204006 (Jesus College), 204751, 210715, 210716 (St John's College Cambridge)
ARU contests that the 40% affordable housing contribution will be viable for student accommodation. The policy approach appears to directly inhibit good equality, inclusion and diversity principles, specific to the student demographic. The policy implications will be starkly different between ARU and the University of Cambridge. Should consider either removing the 40% requirement for student accommodation altogether or consider an	203976 (Anglia Ruskin University)

<p>alternative approach that would have direct benefits to student affordability. No affordable housing requirement should apply for University-led PBSA.</p>	
<p>Object to 40% affordable housing provision being sought on purpose built student accommodation (PBSA). This will stop demand being met for this type of accommodation. There should be no requirement for affordable housing on PBSA.</p>	<p>208484 (Carter Jonas)</p>
<p>Unclear what 'within an existing university or college campus site' means, when a college has dispersed sites. Unreasonable to seek an affordable housing contribution from student accommodation developments on a site currently within college ownership. Amend policy to not seek affordable housing contribution where the proposed development is within an existing university or college campus site, for the redevelopment of sites within the ownership of university or college at date of adoption of the GCLP, or which will continue to be owned by a university or college after the redevelopment to provide student accommodation to meet its needs.</p>	<p>210978 (Kings College), 211074 (Girton College), 211528,211529 (Trinity College)</p>
<p>Object to developments of student bedrooms being required to make an off-site contribution for affordable housing. Unclear how this aligns with policy on student accommodation, which proactively supports delivery of student accommodation to meet needs. Financial burden will discourage the provision of purpose built student accommodation.</p>	<p>208248 (Kings College), 208292 (Trinity College), 208297 (Girton College)</p>
<p>A more flexible approach to affordable housing mix is taken for older persons' housing. Mixed tenure buildings (e.g. combining social rent with affordable rent or sale) can create market challenges and affect viability. Flexibility in tenure is therefore essential to ensure</p>	<p>201942 (A Hanover)</p>

<p>the viability and successful delivery of older persons' housing developments to meet needs.</p>	
<p>Confusion in the Viability Assessment as to what specialist housing models have been tested – extra care, sheltered housing and / or retirement villages? Viability testing needs to be re-considered for different specialist housing types.</p>	<p>208318 (Churchill Retirement Living with McCarthy and Stone)</p>
<p>Object to the requirement for affordable housing at 40% to be delivered on Build to Rent and Co-living developments. This will stop demand being met for this type of accommodation and does not conform with the requirements of National legislation. In line with National Guidance, any affordable housing on BtR or Co-living should be capped at 20%.</p>	<p>208484 (Carter Jonas)</p>
<p>General support for policy but requested that the requirement to provide 25% of all affordable homes as shared ownership is removed or amended. Cambridge City Council only retains legacy shared ownership stock and does not have the capacity to administer a new shared ownership programme. Policy approach does acknowledge the importance of a mix of affordable housing.</p>	<p>204418 (Cambridge Investment Partnership (CIP))</p>
<p>The policy needs to ensure it is sufficiently flexible in order to respond to changing needs and opportunities. On-site provision should also be subject to site-specific viability constraints. Furthermore, the ability to include cascade mechanisms is requested to be included in the policy.</p>	<p>203106 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>

<p>The policy does not include any wording on how the delivery of affordable housing can be altered should there be material viability considerations. This should be addressed through an amendment or standalone policy.</p>	<p>208684 (Guilden Morden Developments Ltd)</p>
<p>The policy should explain why the affordable housing tenures change depending on whether the quanta are 10-14 or 15+ units.</p>	<p>208684 (Guilden Morden Developments Ltd)</p>
<p>Consider applying lower affordable housing requirement of 25% to support housing delivery and scheme viability</p>	<p>207775 (Hilton Cambridge City Centre)</p>
<p>The proposed affordable housing policy has evolved to introduce more prescriptive requirements, particularly in relation to tenure mix on developments of more than 15 dwellings. The policy provides no flexibility to depart from the specified tenure split where an alternative mix could be robustly evidenced and justified. In practice, it is common for tenure mixes on larger, more complex/strategic sites to evolve as proposals are refined, often through the preparation of a bespoke, site-wide housing strategy submitted alongside a planning application. Such an approach provides a more effective and responsive mechanism for determining an appropriate affordable housing mix, reflecting site-specific circumstances and identified needs.</p>	<p>204880 (Hill)</p>
<p>The criteria raised in relation to clustering should acknowledge the need to consider the efficient management of affordable homes in clusters, cost effective maintenance and reduced service charge burden.</p>	<p>204880 (Hill)</p>

Object to grouping or clustering of affordable homes – given that new affordable homes should be tenure blind and indistinguishable from other housing. Equivalent proportion of affordable homes (to market homes) should be in prime locations within the development.	208055 (Northstowe TC)
Clustering requirements should be considered for the whole site, and not just individual parcels.	208056 (Northstowe TC)
The policy requires greater flexibility to reflect site specific constraints and the changing viability landscape. The policy needs to incorporate explicit flexibility to allow for cascade mechanisms within S106 agreements.	204601 (Redrow South Midlands)
Criterion 5(e) sets out the precise number of bedspaces to be provided in affordable homes, this would not allow for the meeting of the most up-to-date evidenced local needs.	204601 (Redrow South Midlands)
Greater flexibility is needed within the policy to allow for more bespoke proposals to be favourably considered.	208610 (Pigeon Land & LIH)
The policy is supported in principle but it is important the Councils continue to review viability as the plan progresses and allocate a sufficient number of sites of varying sizes, types and locations.	210262 (Vistry Group), 204884 (Vistry Group)
Paragraph 6 of the policy should further clarify as to what constitutes “small groups or clusters” in practice.	210263 (Vistry Group), 204884 (Vistry Group)
The appropriateness of the viability tested route should be explicitly mentioned within the policy wording, rather than the supporting text (point 9.15). This will carry greater weight in decision making rather than being perceived as guidance or an aspiration, and will	204098 (Brookgate Land and Network Rail Infrastructure Ltd), 204291 (Bellway Strategic Land), 204519 (Bellway Strategic Land)

provide greater clarity for developers, especially in light of the increased requirements for medium scale sites.	
A fixed 40% requirement is often unviable for small and medium-sized schemes delivered by SME developers. While suitable for large strategic sites, it creates a delivery gap for schemes of 10 to 30 dwellings, leading to stalled sites or protracted viability negotiations. A scaled approach is recommended as this would improve viability, certainty and housing delivery while still securing affordable homes.	204569 (NP Architects)
Policy should be amended to introduce greater flexibility in prescribed affordable housing tenure mix, with clearer recognition of viability considerations.	205460 (Mac Mic Land), 211564 (Martin Grant Land Limited)
Specific split of affordable housing tenures does not allow flexibility to respond to changing circumstances over the lifetime of a development, and no wording that allows for exceptions that have been secured on other strategic sites.	209037 (Marshall Group Properties)
The Policy should include a broader range of affordable tenures, as it currently lacks reference to other intermediate housing options, such as discount to market provision.	209706 (Endurance Estates), 209707 (Endurance Estates), 211564 (Martin Grant Land Limited)
There is ambiguity regarding the application of the policy to keyworker provision, as there is no reference to keyworker housing within the policy and therefore whether keyworker accommodation qualifies as affordable housing.	211564 (Martin Grant Land Limited), 205069 (Endurance Estates)
Whilst the EEAST understands affordable rented housing should be prioritised, we think identifying NHS and emergency services staff (both clinical and administrative) as key workers is a very important part of staff retention in and around NHS properties.	210336 (East of England Ambulance Service NHS Trust)

<p>Policy should be amended to seek 50% affordable housing, with a greater proportion of social rent homes required. For land within the Green Belt, the policy should seek 55% affordable housing.</p>	<p>203739 (Cambridge Green Party)</p>
<p>After point 1, a new sentence should state “This requirement applies only to new builds. Where a development includes the re-use of long-term empty buildings (for example through conversion, refurbishment or subdivision of existing buildings), any units brought back into use in this way will be disregarded for the purpose of calculating the development’s affordable and social housing requirement. However, if re-used units within a development are provided as affordable or social homes, they can still count towards meeting the requirement.” This incentivises the creative re-use of empty buildings, which is more efficient and sustainable than building new homes.</p>	<p>203739 (Cambridge Green Party)</p>
<p>At the end of the first paragraph in the supporting information, the following sentence should be added: “The combination of apartment housing and denser forms of development with self-contained dwellings is also an important strategy for increasing affordable and social housing production.” This reflects the fact that denser, apartment-led development makes the delivery of affordable housing more viable, efficient and sustainable, directly supporting the policy’s stated aim of maximising supply.</p>	<p>203739 (Cambridge Green Party)</p>
<p>Specific provision should be for council housing and key-worker housing close to places of employment, especially hospitals.</p>	<p>203815 (A Carpen)</p>
<p>The Policy should seek to retain flexibility on the tenure to allow developments to reflect localised need for affordable housing.</p>	<p>208342 (Thakeham Homes Ltd)</p>

<p>The table in 5e duplicates the Nationally Described Space Standards (NDSS) requirements. The table also fails to recognise some of the minimum number of bedrooms allowed under NDSS. To avoid duplication and confusion, it is recommended that paragraph 5e is removed.</p>	<p>208342 (Thakeham Homes Ltd)</p>
<p>The policy identifies that all schemes are required to deliver affordable housing onsite, which fails to recognise that there may be circumstances in which provision of affordable housing off-site may be preferable. Recommended that the policy is revised to identify a preference for onsite affordable housing delivery, however that off-site affordable housing provision will be accepted where robust justification for this approach is provided.</p>	<p>211288 (Woolsington One Ltd)</p>
<p>The option for off-site provision or a financial contribution as an alternative to on-site affordable housing provision if it is not suitable or viable is supported.</p>	<p>211466 (Hayfield Homes Construction Ltd)</p>
<p>Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.</p>	<p>204055 (S Rogers)</p>

Policy H/ES: Exception sites for affordable housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was recognition that rural exception sites could support specific types of households such as young families and older people in need of specialist or more affordable housing options. However, there were calls for strong controls to be applied to exception sites to avoid negative impacts on village character and the green belt. It was suggested that market housing on exception sites should be capped at 20% and that rural exception schemes should originate and be directed by the local community rather than a developer.

It was suggested that the policy should be amended to specifically cater for, and prioritise, community led housing on exception sites. Some of the costs associated with progressing an exception scheme were considered unreasonable for a charity and exemptions should apply. Some clauses in the draft policy were considered not to address the specific circumstances of charitable almshouse associations.

It was proposed that viability of rural exception schemes could be supported by allowing additional affordable homes to be built in excess of the need identified for the village concerned. This would be as an alternative to delivering market housing in recognition that not all Registered Providers deliver market housing.

A developer argued that rural and First Homes exception sites should be addressed through two separate policies. They also

proposed loosening the requirements around undertaking a housing needs assessment by deleting reference to 'independent' and 'long term needs' and that there should be no requirement to name a Registered Provider in the s106 agreement as they wanted the option to engage with Registered Providers throughout the planning application process or the sale of the site post planning.

Response to main issues raised in representations:

Previously, the draft policy, in line with the NPPF, allowed schemes to include some market housing to support viability. However, not all Registered Providers deliver market housing so allowing them to include additional affordable housing in excess of the identified needs of the village provides an alternative option to improve viability. Therefore, an additional section has been added to the policy which enables rural exception schemes to include additional affordable housing in excess of the identified need of the village in order to support viability.

It is considered that the controls proposed are adequate to ensure rural exception schemes are developed and located appropriately. The NPPF already requires that rural exception sites in the Green Belt must include a sequential test to demonstrate there are no alternative non-Green Belt sites. Whilst it is not practical to require that all rural exception sites are led by the local community, good practice dictates that such schemes should be brought forward through a partnership approach including strong engagement with the local community.

Whilst the policy makes no special allowances for community led housing approaches it does explicitly state that rural exception sites must be delivered by, or in partnership with, Registered Providers or community-led housing groups and these must be named in the relevant s106 agreement. The impact of the housing scheme on the adjoining village will be no different regardless of

whether led by a Registered Provider or community led housing group and therefore there is no logic in applying different criteria. Similarly, a key criterion for granting planning permission for a rural exception scheme outside of a Defined Development Extent is that there is an identified local housing need and there is no rationale for waiving the requirement for a housing needs assessment for a specific provider. However, it is recognised that community led housing groups could have alternative sources of information that could add to the evidence base. It is not accepted that clauses in the policy are inconsistent with a community led housing approach to rural exception sites. For example, where a local almshouse charity has a catchment which spans beyond a single parish there is no reason why this wider geography could not be applied to the cascade mechanism in the s106 agreement.

Rural exception sites and First Homes exceptions sites have been kept under the same policy. It is important that these alternative approaches to delivering affordable housing are complementary and that First Homes exceptions sites do not crowd out rural exception sites. An integrated policy approach is considered the best way to achieve this. The requirement for an independent housing needs assessment has been retained as this is an important part of the process of delivering a rural exception scheme and provides reassurance to partners, including the local community, that the scheme is addressing a demonstrable local need. The requirement that the need 'can reasonably be expected to persist in the long term' simply ensures that a scheme is not developed to address a need caused by a one-off event or seasonal activity where the need is likely to dissipate in a reasonably short period of time. Requiring a Registered Provider or community led housing group to be named in the s106 agreement ensures that the scheme is workable and does not include conditions that would make it difficult for the organisation that will ultimately manage the homes to operate the scheme. Exception sites achieve viability through low plot values and it is not appropriate to inflate these through bidding processes.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Exception sites must not undermine Green Belt, village identity, or the Girton Gap.	202256 (Girton PC)
The threshold for allowing exception sites for affordable housing on Green Belt land should be significantly raised to prioritise protection of the Green Belt. Alternative sites in other locations (villages, urban centres and new settlements) should be considered instead of encroaching on Green Belt land.	201020 (M Colville)
Proposals must be truly exceptional and locally justified. Require strong tests of local need and landscape fit.	202256 (Girton PC)
Rural exception schemes should originate and be directed by the local community, not a developer.	201897 (R Pargeter)
Clauses in Policy H/ES do not take into account the specific circumstances of charitable almshouse associations in providing affordable housing.	201641 (Stapleford PC), 210953 (Great Shelford Parish Council)
<p>Some clauses do not consider the specific circumstances of charitable almshouse associations in providing affordable housing. For example:</p> <ul style="list-style-type: none"> • clause 1b – almshouse residents are not tenants but occupants who pay a monthly maintenance charge which, is not specifically related to affordable housing rents, • clause 4a – an almshouse charity constitution determines the ‘local area’ for the charity which can extend beyond a parish (the usual definition of ‘local’ for an exception scheme), • clause 4b – an almshouse charity constitution can require that local connection criteria are retained throughout the lifetime of a property. 	202101 (Great Shelford Village Charity)

<p>GCLP makes no express provision for housing provided by charities, and in particular almshouse charities. Requirement to provide professional reports of 'need' demands the use of charity funds to demonstrate something already known, as this will decrease the amount of charity funds remaining available for the provision of affordable housing in the long term.</p>	<p>202101 (Great Shelford Village Charity)</p>
<p>Recommend strengthening the policy's wording to prioritise community-led housing initiatives for exception sites where feasible.</p>	<p>203740 (Cambridge Green Party)</p>
<p>A new clause should limit market housing to a maximum of 20% of total dwellings on exception sites to ensure they remain primarily for affordable and social housing.</p>	<p>203740 (Cambridge Green Party)</p>
<p>Support for rural exception sites is positive, but rural delivery challenges are not fully addressed:</p> <ul style="list-style-type: none"> • Small village schemes often face viability constraints, infrastructure limits and fewer Registered Provider partners, • There is little reference to retaining younger households in villages or providing homes linked to local employment, • Stronger rural proofing would include more flexibility for small rural sites, clearer support for community led housing and better alignment between housing growth, rural transport and access to services. 	<p>203179 (Cambridgeshire ACRE)</p>
<p>Rural and First Homes exception sites should be addressed through two separate policies to allow for more convenient interpretation by applicants in order to meet the overall needs for housing and other development types.</p>	<p>208686 (Guilden Morden Developments Ltd)</p>

<p>Clause 1a should be altered to 'demonstrable need for affordable housing for those with a connection to the settlement and which is evidenced by a local housing needs assessment' as current wording requiring 'independent' needs assessment and 'long term' needs is overly stringent.</p>	<p>208687 (Guilden Morden Developments Ltd)</p>
<p>Whilst it is appreciated that evidence of the social or economic need for affordable housing is required, that the need identified should be expected to persist in the long term is objected to. The NPPF simply requires that such schemes demonstrate that they will contribute towards meeting identified local needs. The Councils should be seeking to support rural exception schemes which address identified local needs for affordable housing at the time of submission, regardless of whether such needs are envisaged to persist in the longer term.</p>	<p>211289 (Woolsington One Ltd)</p>
<p>Requiring Registered Providers to be named in S106 agreements hampers the delivery of the site and prevents the applicant from engaging with multiple RPs throughout a planning application process or the sale of the site post planning in order to meet both parties' needs for adaptation to circumstances at the time of land disposal.</p>	<p>208688 (Guilden Morden Developments Ltd)</p>

Policy H/HM: Housing Mix

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was a call for a higher proportion of smaller and/or affordable dwellings. They also suggested that deviations from the proposed policy mix should be justified at the local level and, where available, supported by evidence from Neighbourhood Plans, local housing needs surveys and the housing register.

Developers considered the policy overly prescriptive and sought a more flexible approach allowing schemes to take account of settlement type, tenure, housing market areas, urban/rural differences, site constraints and context and changing market demand. It was suggested that the policy would work better if percentages were expressed as a range rather than fixed figures. One respondent made a similar point specifically about older peoples' housing developments. Another sought clarity as to whether charitable almshouse associations would have flexibility to deviate from the policy requirements in order to address their specific target market.

There was a proposal that the policy should incentivise the delivery of social rent affordable homes and mixed use developments by allowing higher densities in these cases. It was argued that this will encourage a more efficient use of land and reduce car dependence.

A comment has been made relating to introducing controls on short-term lets.

Response to main issues raised in representations:

There is a concern that many housing schemes deliver smaller market dwellings as houses while delivering the equivalent smaller affordable dwellings as flats. This causes problems in South Cambridgeshire where flats can be more challenging to let and typically have higher turnover rates. The policy has been amended to ensure affordable dwellings are delivered in similar proportions, in terms of housing types (houses, flats and bungalows), to market dwellings.

The policy already requires that over half of new affordable housing on schemes of 10 or more dwellings are built as 1 or 2 bedroom dwellings. A significant proportion of market housing will also be required to be built as 1 or 2 bedroom dwellings in both Cambridge and South Cambridgeshire. Where variations from the proposed housing mix are put forward these will need to be justified by evidence that relates to the specific site and local housing market. Evidence from Neighbourhood Plans, local housing needs surveys and the housing register are all likely to be very relevant. Made Neighbourhood Plans and adopted Local Plans have the same weight in decision making, however, if there is any conflict between the policies in the two plans, the most recently adopted/made plan takes precedence in decision making.

The proposed housing mix is based on robust evidence of housing need including projections of population and household types and aims to satisfy a diverse range of housing needs and create sustainable, inclusive and mixed communities. However, it is recognised that demand can change over time and that every site has its own unique set of characteristics. The policy strikes a balance by setting out an ideal mix and recognising that there is scope for deviation where developers can provide robust evidence for an alternative housing mix. The policy also recognises that alternative housing mixes will often be appropriate for specific housing proposals such as student accommodation, housing for older people and community led housing developments targeting particular groups within the community. Given the scope for justified deviations from the proposed housing mix it is not considered necessary to present the housing mix in the format of ranges.

The appropriateness of developing at higher density or with a higher proportion of affordable housing is a matter for other policies. Comments on short-term lets have been addressed under the visitor accommodation policy (Policy J/VA). The matter suggested in the comment sits outside the remit of the Local Plan.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for approach to securing a varied housing mix within new residential developments and welcome the flexibility within the policy to allow for alternative mixes where this can be robustly justified. Important that the inclusion of “Unless an alternative mix has been justified as part of a planning application...” is retained in the policy.	211224 (Terra Strategic), 211242 (Living Housing Space), 211467 (Hayfield Homes Construction Ltd), 211565 (Martin Grant Land Limited)
Need more one bed properties including co-housing to address needs of 20-30 year olds.	204021 (Histon & Impington PC)
Girton needs a housing mix more focused on smaller properties, not large family homes or high density flats.	202257 (Girton PC), 205577 (Girton PC), 205578 (Girton PC)
Need increased provision of ‘affordable’ one and two bed market homes to tackle housing unaffordability due to high price of market housing.	207750 (Whittlesford PC)

Social and affordable housing should be prioritised over market housing.	205572 (G Briscoe)
Flexibility in tenure and housing mix is essential to ensure the viability and successful delivery of older persons' housing developments to meet needs.	201939 (Anchor Hanover)
Seek clarification that charitable almshouse associations and similar organisations would be encompassed by exceptions set out in clause 2 and permitted to deviate from the type and mix of housing set out in clauses 1, 3 and 4. Requiring evidence to justify deviations would erode charity funds and reduce funds available for provision of affordable housing.	202106 (Great Shelford Village Charity)
Justification for changes to the prescribed housing mix should be made at the local level.	201437 (Histon & Impington PC)
It is unclear how affordable housing mixes as set out in adopted neighbourhood plans would be dealt with under the policy, particularly where they differ from requirements set out in the policy	201642 (Stapleford PC), 210954 (Great Shelford PC)
The percentage of one-bedroom units being required in South Cambridgeshire is too high. The GCLP should recognise that providing larger units (i.e. two bedrooms - still relatively small homes), will allow families to grow without the need to move.	203395 (ESCO Prospect)
A generalised housing mix to be provided across the plan area regardless of settlement type, tenure, or different housing market areas, is overly prescriptive.	204603 (Redrow South Midlands)
Policy should be refined to ensure appropriate mixes are provided across urban and rural areas and across different forms of home tenure.	203395 (ESCO Prospect), 204603 (Redrow South Midlands)
Housing needs assessments not always a robust way of assessing need as they may not reflect demand for extra bedrooms to serve other purposes such as a home office.	204603 (Redrow South Midlands)

<p>Support for this policy, which sets out housing mix as a series of recommendations expressed as a range, rather than as fixed requirements. This provides an appropriate level of flexibility, allowing development proposals to respond to changing market conditions and housing needs over the plan period, while still supporting the delivery of a balanced mix of homes.</p>	<p>204887, 210264(Vistry Group)</p>
<p>Clarification sought on how applicants should have regards to 'location and character of the area, the built form of the new development, the nature or type of development being proposed, the viability of delivery given site-specific constraints or requirements, changes in affordable and market housing demand in the local area, and the existing housing mix in the surrounding area', when justifying deviations.</p>	<p>208689 (Guilden Morden Developments Ltd)</p>
<p>The policy does not enable the ability to respond to market demands. In particular, there is insufficient evidence demonstrating that the specific percentages set out are justified across:</p> <ul style="list-style-type: none"> • different market areas, • settlement types (urban, edge-of-Cambridge, new settlements, villages), • tenure types, or • varying site constraints. 	<p>203108 (Barratt David Wilson Homes & NW Cambridge Consortium of Landowners)</p>
<p>It is important that the policy allows for sufficient flexibility so that it can respond to housing mix over the lifetime of the plan period and that the proposed housing mix is not strictly adhered to as an overall approach and is instead treated on a case by case basis through the development management process.</p>	<p>208911 (Nightingale Land and Residential)</p>

The Policy should include more flexibility in relation to the required housing mix to reflect the circumstances of each site and its context as well as market demand and evidence of local needs in accordance with Government policy.	205071 (Endurance Estates)
Use of fixed percentages could undermine scheme design and undermine deliverability. Welcome supporting text which confirms that deviations will be permitted where justified. This should be within the policy wording to ensure consistent and pragmatic decision making.	207026 (Mac Mic Land)
Support overarching objective of the policy to secure a balanced housing mix that responds to identified needs.	207026 (Mac Mic Land)
Policy is overly prescriptive, lacks flexibility and does not reflect the practicalities of delivery on large sites. Rigid requirements risk constraining delivery and undermines ability to respond to market conditions.	208992 (Barratt Homes Northampton)
Evidence base does not sufficiently justify the detailed mixes proposed – SHMA provides useful strategic guidance, but does not support precise percentages being applied across all sites.	208992 (Barratt Homes Northampton)
Policy fails to explain how its requirements will interact with other policy burdens which influence housing typologies and layouts.	208992 (Barratt Homes Northampton)
Policy would be more workable if percentages were expressed as ranges rather than fixed figures.	208334 (Gladman Developments)
Recommend adding a clause requiring special justification for predominantly low-density, market-rate housing proposals, while supporting higher-density schemes that deliver social rent above minimum requirements. This will incentivise the development of new social rent housing and more efficient land use.	203746 (Cambridge Green Party)

<p>Recommend amending point 4 to read “Development proposals will be supported where (a) a mix of housing types (e.g. houses, flats and bungalows) are provided proportionally across all market and affordable tenures, taking account of local character, built form and up-to-date evidence of housing need; and (b) where feasible, the proposals have prioritised higher-density and mixed-use forms that integrate housing with employment, services and facilities.” This will help to encourage more efficient use of land in high-demand areas and reduce car dependence.</p>	<p>203746 (Cambridge Green Party)</p>
<p>Add reference to any relevant adopted Neighbourhood Plans, recent local Housing Needs Surveys, and Housing Register as evidence for the housing needs of the local area.</p>	<p>201387 (Gamlingay PC)</p>
<p>Commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge’s long-standing challenges.</p>	<p>203534 (Cambridge Ahead)</p>
<p>It is important that the implementation of the housing mix policy is supported by the allocation of a sufficient number of sites across a range of sizes, locations and settlement types.</p>	<p>210265 (Vistry Group)</p>
<p>A key barrier to effective regulation is the absence of a compulsory registration system for short-term lets. Without registration, the Council cannot easily identify which properties are operating as short-term rentals, distinguish genuine home-sharing from commercial activity, or ensure compliance with basic requirements. Crucially, registration must be linked to clear planning control. The Local Plan should provide an explicit policy framework confirming when short-term letting amounts to a material change of use and requiring planning permission. Without compulsory registration linked to clear planning control, the Local Plan will fail to address regulatory imbalance, housing loss and market distortion caused by short-term letting, and therefore calls for these measures to be explicitly embedded within policy</p>	<p>211865 (Hilton Cambridge City Centre)</p>

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

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was general support for the policy, although there were calls for stronger controls to prevent detrimental impact on village character, green spaces and settlement patterns, and due to the importance of gardens and green spaces in reducing localised flooding, for community well-being, and for urban wildlife. The importance of residential annexes in supporting multi-generational living was recognised and there was concern that these should not be allowed to be converted to short term lets or new dwellings.

Those calling for a more flexible approach argued that garden land provided an important source of housing supply from small sites, particularly in rural areas. Local architectural practices argued that the proposed approach would risk constraining sustainable, well-designed housing opportunities and was in conflict with national planning policy which promotes efficient use of land, optimisation of site capacity and the role of small sites. It was also suggested a more flexible approach should be adopted for edge of settlement sites which could provide more opportunities for small residential schemes and self build housing.

Response to main issues raised in representations:

There were comments in favour of protecting gardens with some urging an even more robust approach. 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 requirements set out in the policy enable proposals to be considered on a case by case basis. The case for a more flexible approach is not supported. The policy, as proposed, does support the development of garden land sites where appropriate but needs to work with Policy S/DE: Defined development extents to avoid encroachment into the countryside.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Strong controls needed to ensure sub-division does not erode village character, green space, or settlement pattern.	202258 (Girton PC)
Given the importance of gardens and green spaces to deal with rainwater, stronger controls are needed to reduce the chances of localised flooding.	205186 (B Nicolson)
Support the Councils' recognition that well-designed development on residential gardens and infill plots can be a "valuable additional source of housing supply", particularly in rural communities where other development opportunities are limited. There can be a conflict with Defined Development Extent policy where boundaries are drawn too tightly. Boundaries should be reviewed to allow more small sites to come forward making effective use of land.	202050 (M Asplin), 202069 (M Asplin)

We are supportive of this policy.	201643 (Stapleford PC), 210955 (Great Shelford PC)
Support a policy of no sub-division of existing gardens in Cambridge. These spaces are vital for community well-being and the wildlife ecosystem, and they define the character of our neighbourhoods.	201988 (M Page)
Strengthen the section about residential annexes to ensure these remain as ancillary uses and are not subsequently converted to short term lets or new dwellings	203422 (Cambridge City Council Liberal Democrat Group)
Policy is overly restrictive and not aligned with national planning policy which promotes efficient use of land. The policy places undue weight on historic patterns rather than planning merits and should instead support garden land development where proposals are well designed and acceptable in terms of character, amenity and access.	204014 (KWA Architects)
A more flexible approach is urged, allowing subdivision where land has been in garden use for at least ten years, enabling sustainable edge-of-framework development while still complying with the wider policy.	204594 (NP Architects)

Policy H/SS: Residential space standards and accessible homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was broad support for the policy in principle, in particular its aim to secure high standards of amenity and accessibility in new homes. Respondents recognised the importance accessible and adaptable housing plays in supporting enabling independent living and ageing in place, and including space within new homes for working from home.

Regarding the internal residential space standards section of the policy several respondents raised an issue with the duplication of the Nationally Described Space Standards (NDSS) in full and that instead a cross-reference to the standards would enhance clarity. Developers also raised concern around the application of the NDSS as a blanket standard for all new homes and suggested that it was overly prescriptive, lacks flexibility and is not supported by evidence. Developers set out the importance of the policy being responsive to site-specific circumstances and market needs where the delivery of smaller homes could be justified and deemed viable, and highlighted that the requirement would place additional financial burdens on developments. One housebuilder was particularly concerned with the fixed NDSS not allowing for things such as Flats Over Garages.

Concern was raised by respondents to the lack of evidence to justify applying a fixed minimum private external amenity space standard of 30sqm, as this would be impractical when delivering housing in higher density locations and risks undermining design quality, local character and optimising housing delivery. Several respondents called for the Councils to consider a more design-led approach that would be responsive to various contexts. Concern was also raised around the requirement for

apartments having set balcony standards and therefore forcing identikit development. The requirement for all dwellings to have direct private amenity space was questioned and that where flatted developments are being delivered communal outdoor space should be able to be provided.

Several respondents support all new homes being required to meet building regulations M4(2) and in principle the introduction of set standards for the delivery of building regulations M4(3) compliant homes. However, comments around the M4(3) standard were varied, with some developers challenging the proposed requirements based on the Housing Needs of Specific Groups study and others suggesting that the requirements when applied to all new allocations would result in an oversupply of these homes which would be difficult for developers to sell, and questioning the feasibility of M4(3) standards in smaller developments and seeking exceptions. The Councils have therefore been asked to reconsider their set M4(3) standards to ensure that they are robustly justified and viability tested. In contrast, some respondents called for greater ambitions for the delivery of M4(3) homes, as is set out in the Greater Cambridge Housing Strategy. The savings made by delivering a greater number of new homes as M4(3) compliant significantly outweighs the additional construction costs over time.

Comments also identified the concerns around the focus on the policy only building to M4(3)(a) (wheelchair adaptable) due to the challenges and costs in converting these to M4(3)(b) (wheelchair accessible). It was highlighted that the requirements for M4(3) homes are inconsistent with national policy as wheelchair accessible homes can only be required where the local authority is responsible for allocating / nominating the occupant. Developers also called for a maximum cap to be applied to the total number of affordable M4(3) units to be delivered on certain schemes.

Some respondents questioned whether the cumulative impact of various policy requirements, including nationally described space standards and accessibility standards, had been tested for viability, and called for the Councils to ensure that the requirements of this policy are fully reflected in viability and site capacity assessments that underpin site allocations.

Response to main issues raised in representations:

Whilst there is concern that the NDSS are replicated within this policy, the Councils have continued to include this as it provides developers/housebuilders and development management officers with a clear reference to the standards when considering planning applications.

The Councils evidence, as set out in the [Housing Needs of Specific Groups study \(2025\)](#), highlights that the Councils should require all new homes to meet the M4(2) standards on the basis of its increasing ageing population and the projected increase in the number of people with disabilities. It is important that new homes across Greater Cambridge provide high-quality internal and external spaces so they are inclusive, accessible, adaptable and flexible to meet the needs of existing and future users, and therefore enable and support healthy lives. There may be specific developments where meeting the required internal space standards, amenity space requirements, and / or accessible and adaptable homes standards, would not be appropriate for the identified occupants, however, 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 anticipated occupants. The evidence set out in [Appendix 1 of the Homes Topic Paper \(2025\)](#) supports requiring all homes to meet the M4(2) standard by showing that the majority of developments for new residential dwellings in recent years are meeting the requirements, and any exceptions are generally developments for specialist accommodation meeting a specific need.

Having considered the representations received regarding the fixed minimum private external amenity space of 30sqm and concern around its application in certain development contexts, the Councils have decided to remove the set external amenity space standard and implement a more design-led, qualitative approach to securing appropriate external amenity space. The implementation of this approach will ensure that schemes provide sufficient amenity space that is appropriate to the typology

and size of the units provided. Applicants will be required to evidence in their Design and Access Statement how the size of the amenity space provided is sufficient for the intended occupants. The Councils have continued to include a specific requirement for apartments to provide direct private amenity space as well as set width and depth requirements as these have been more standardly applied across all contexts in Greater Cambridge and align with national guidance. As set out in the supporting information, where these set balcony standards are not appropriate for the identified occupants and justification can be provided that alternative standards are more appropriate, then exceptions can apply. The policy has been amended to provide clarification that in exceptional circumstances the provision of shared external amenity space will be allowed on schemes delivering aspects of communal living such as specialist housing, purpose-built student accommodation, co-living or co-housing. The amount of external amenity space required will be determined on a design and context led basis and this does not mean that private amenity space will also not be required as part of the scheme.

The policy continues to set the same requirements in relation to M4(2) and M4(3) standards as set out in the Draft Greater Cambridge Local Plan. The Councils have considered the comments received and consider that the current requirements are justified. The [Housing Needs of Specific Groups study \(2025\)](#) sets out that there is an estimated 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 Housing Strategy sets out a direction of travel for accessible and adaptable homes, based on an earlier version of the Housing Needs of Specific Groups Study. National planning guidance sets out that Local Plan policies for wheelchair accessible homes (M4(3b) standard) should only be applied to those dwellings where the local authority is responsible for allocating or nominating the occupant. This does not prevent Local Plan policies from requiring market homes to be wheelchair adaptable homes (M4(3a) standard).

Although over 52,000 homes are anticipated to be delivered within the plan period (2024-2045), of these 74% are part of the

existing supply, and therefore most of these new homes already have planning permission and therefore will not be subject to the new requirements for M4(2) and M4(3) as set out in this policy. It is therefore important that new developments of 20 dwellings or more are required to deliver wheelchair user dwellings to contribute towards meeting the identified need. The policy already allows for exceptions to meeting the M4(2) and M4(3) requirements, if robust justification is provided. It is therefore not considered necessary to apply a maximum cap on the number of wheelchair user dwellings that can be provided in any one development.

The Local Plan has been subject to a whole plan viability assessment, which includes taking account of the requirements of this policy alongside other policy requirements. It has concluded that it is viable to seek all the requirements set out in this policy for residential space standards and accessible and adaptable homes.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
The mention of boilers in new build homes is out of date. After 2025, boilers are banned so that space standards must allow for a hot water tank/heat store.	201003 (N Upstone)
It is important that residential space standards and accessible homes requirements are clearly set out in the policy.	211566 (Martin Grant Limited Ltd)
Support for the policy and its principle of high standards for amenity and accessibility in new homes.	201644 (Stapleford PC), 202259 (Girton PC), 203431 (Cambridge City Liberal

	Democrat Group), 204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill), 210956 (Great Shelford PC), 210957 (Great Shelford PC)
To enable people to live in their own homes for longer, consideration should be given to those who maybe already be disabled or have difficulty climbing stairs. Ensuring new builds have some ground floor bedrooms as standard or have sufficient space to retro fit an internal lift (rather than a stair lift) so upper floors can be accessed would support residents remaining in their home for longer.	210334 (East of England Ambulance Service NHS Trust)
Concerns that this allows for one person one bedroom homes, when in fact these inevitably have a double bedroom and once built cannot enforce a single person/single bed arrangement on which it was constructed at the smaller 37sqm size. Can the one person/one bed option be reviewed?	203431 (Cambridge City Liberal Democrat Group)
Support the principle of the policy, however the policy must be applied with sufficient flexibility to respond to site-specific circumstances, particularly as the rigid application of minimum internal and external space standards may not be achievable without undermining deliverability or viability in certain locations.	204888, 210266 (Vistry Group)
Object to blanket application of nationally described space standards across Greater Cambridge – need to be justified by need. Flexibility needed to enable homes to reflect market needs, and there may be market demand for homes that are smaller than nationally described space standards.	208343 (Thakenham Homes Ltd)

<p>The policy unnecessarily duplicates the Nationally Described Space Standards (NDSS). A cross-reference would suffice and enhance clarity.</p>	<p>204616 (Redrow South Midlands), 204886 (Hill), 205345 (Home Builders Federation), 208690 (Guilden Morden Developments Ltd), 211290 (Woolsington One Ltd)</p>
<p>The requirement for all new residential developments to meet and wherever possible exceed the residential standards set out in Nationally Described Space Standards is not supported, as it is overly prescriptive, lacks flexibility, is not supported by local evidence, and would place additional financial burdens on developments which could affect viability of developments.</p>	<p>211225 (Terra Strategic), 211243 (Living Space Housing), 211468 (Hayfield Homes Construction Ltd), 211268 (Terra Strategic)</p>
<p>Policy is unduly rigid and imposes fixed minimum private amenity space requirements for all dwellings, including a blanket 30sqm provision for every house and prescribed balcony dimensions for apartments.</p>	<p>203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>
<p>A blanket requirement for all homes to meet the nationally described space standards and M4(2) standard does not allow for things such as Flats Over Garages (FOGs) due to accessibility requirements. This can impact place making and will increase the size of units which can price first time buyers out the market.</p>	<p>203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>

The minimum requirement for external amenity space seems arbitrary. For some cases, it wastes space that could be better allocated to other purposes, while not being large enough to be any use. The provision of communal space should be applied to all properties.	203177 (P Tribble)
Requiring all apartments to have a balcony creates identikit developments and forces space to be wasted where it may not be wanted.	203177 (P Tribble)
For apartments, need large balconies or terraces to be provided, with pleasant views.	208733 (Cllr M Morgan)
Older people's housing schemes should be exempt from minimum external amenity space standards, and instead should consider the quality and function of the amenity space instead. With respect to flats and maisonettes it should be noted that there are often other planning issues that restrict the incorporation of a balcony such as overlooking and this should also be noted with the policy.	208319 (Churchill Retirement Living with McCarthy and Stone)
Concerns about the set external amenity space standards, when balanced with requirements from other policies as this may constrain site opportunities. Particularly relevant for allocations with specific housing numbers and densities.	204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill)
Concerns around the rigid external amenity space standards, particularly the fixed 30sqm private amenity space requirement. Evidence is lacking to justify this standard and applying it uniformly across all houses could hinder density and conflict with site allocation and character policies.	204616 (Redrow South Midlands)
The narrow exception that only allows for communal amenity space to be provided for co-housing and community-led schemes is insufficient. The policy should allow for flexibility in design.	204616 (Redrow South Midlands)
Uniform minimum private amenity space standards do not reflect the diversity of development contexts across Greater Cambridge. Likely to be impractical to deliver in higher density locations and risk	208993 (Barratt Homes Northampton)

undermining design quality, compromising local character, and optimising housing delivery. No justification for requirement of 30 sqm. Need a more design led and context sensitive approach.	
Question the requirement for all dwellings to have private outdoor space, as not always practically possible. Where flatted development is provided communal outdoor space should be able to be provided.	208344 (Thakenham Homes Ltd)
Current external space standards lack sufficient flexibility and need to take account of broader considerations such as viability and site-specific circumstances.	205345 (Home Builders Federation)
Supports all homes meeting M4(2) standard, and suggests that requirement for M4(3) standard should be increased from 5% to 10%. Planning for only M4(3a) (wheelchair adaptable) and not M4(3b) (wheelchair accessible) creates problems. Better to make housing fully accessible from the outset, rather than relying on adaptation.	201152 (K Gaunt)
Local Plan should follow the advice set out in the Housing Strategy of 10% of new market homes and up to 25% of affordable homes meeting the M4(3) standard.	207575, 207578, 202851 (R Pargeter)
Provision of 10% M4(3) is supported.	203116 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
The requirement for all homes to meet M4(2) standard should be based on evidenced need and where Building Regulations are to change, this will supersede planning policy.	208346 (Thakeham Homes Ltd)
The requirements for M4(3) homes will have implications for the cost of development and as such could be a challenge for SME's delivering small to medium size developments. This should be an optional	211588 (Terra Strategic)

<p>requirement, if viability allows. The policy should be drafted to include reference specifically to considerations of viability.</p>	
<p>The requirements for M4(3) homes will have implications for the cost of development and should be reflected within viability assessments. Further flexibility should be included to respond to viability and deliverability concerns.</p>	<p>211468 (Hayfield Homes Construction Ltd), 211581 (Living Space Housing Ltd)</p>
<p>The Local Plan presents a major opportunity to reduce long-term costs. Homes should accommodate visitors, including elderly or disabled relatives who need ground-floor facilities, and ideally wheelchair users, reducing isolation and enabling short stays. Accessible housing can also help families support temporarily incapacitated members, and families with pushchairs. Though slightly more expensive to build, costs are modest, recoverable, and likely offset by long-term savings.</p>	<p>207576, 207577 (R Pargeter)</p>
<p>A wide range of accessible and adaptable M4(3) dwellings is essential, with proportions and sizes based on present and future local need ensuring effective long-term provision. Buyers should be able to arrange bespoke adaptations, sometimes negotiating savings.</p>	<p>207577 (R Pargeter)</p>
<p>Wheelchair users should be actively informed about suitable new M4(3) homes, but provided there is a large supply of M4(3) properties, developers should not be restricted to sell to only households in immediate need.</p>	<p>207578 (R Pargeter)</p>
<p>Requirements for M4(3) are inconsistent with national policy as: wheelchair accessible homes can only be required where the local authority is responsible for allocating / nominating the occupant, and no viability evidence has been provided to demonstrate these units can be viably delivered (especially when considered alongside other requirements).</p>	<p>208993 (Barratt Homes Northampton)</p>

<p>More dwellings should be allocated for wheelchair users as the changes required by M4(3) are minimal and provide benefits to all not just people in wheelchairs.</p>	<p>202885 (H Cook)</p>
<p>Requirements for the delivery of M4(3) units may risk site viability in order to accommodate these units. There should be a maximum cap on the number of M4(3) units to be delivered within a development, particularly developments providing 100% affordable housing.</p>	<p>204437 (Cambridge Investment Partnership (CIP)), 204886 (Hill)</p>
<p>The requirement for 10% of affordable and 5% of market dwellings to meet M4(3) wheelchair user standards conflicts with national guidance, lacks evidence and exceeds demonstrated needs.</p>	<p>204616 (Redrow South Midlands), 205345 (Home Builders Federation), 208319 (Churchill Retirement Living with McCarthy and Stone)</p>
<p>Requirements for M4(3) are not supported by the Councils own evidence, which only requires around 970 dwellings and there would be a surplus against this if applied to all proposed new allocations. Will impact on density of developments as these homes are more land hungry – especially flatted developments requiring lifts. Added costs of providing these homes.</p>	<p>208345, 208347 (Thakenham Homes Ltd)</p>
<p>The approach set out in the policy is strongly supported, as accessible and adaptable housing plays a key role in supporting healthy ageing, enabling independent living, and reducing the risk of falls, injury, and avoidable hospital admissions. However, have concerns with the fact that the policy allows exceptions to the M4(2) and M4(3) standards where viability or site-specific constraints are demonstrated. Recommended that the policy be strengthened to clarify that exceptions are expected to</p>	<p>210632 (Transport 2000 Cambs & W Suffolk)</p>

be robustly justified, and subject to transparent scrutiny. Consideration could also be given to requiring partial compliance where full compliance is evidenced to be unviable.	
The cumulative impact of various policy requirements, including nationally described space standards and accessibility standards, has not been tested for viability, risking housing deliverability.	204616 (Redrow South Midlands)
Essential that the requirements of this policy are fully reflected in viability and site capacity assessments that underpin site allocations.	210266, 210267 (Vistry Group)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204058 (S Rogers)

Policy H/SH: Specialist housing

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was support for the overarching objective of addressing specialist housing needs, particularly related to older people. However, there were differing opinions on how this should be achieved. There was support from individuals and community groups for specialist housing to be well integrated with local communities and be within walking distance of facilities. The Cambridge Green Party and Cambridgeshire County Council wanted the threshold at which specialist housing was required reduced from 1,000 dwellings, and Great Shelford PC have asked that planning decisions for older peoples accommodation takes into consideration the number of units already provided via such facilities/institutions within an area to ensure that healthcare infrastructure is not overwhelmed.

Developers were concerned that the specific criteria such as the requirement to be near local facilities combined with the requirements to provide 10% of dwellings as specialist housing on schemes of 1,000 or more dwellings were unreasonable and could affect viability. It was argued that some planning application related requirements were not necessary: the shortage of specialist housing for older people is well documented and further evidence is not needed, whilst the requirement to assess impact on healthcare services and/or make contributions should be removed given that specialist housing reduces the costs to social care and health systems. It was argued that the plan should include specific allocations in sustainable locations to meet the needs of older people and where need was not being met the policy should require that a presumption in favour of development be applied.

There were calls for the Councils to set out an indicative figure, or a range, for the number of units of specialist housing for older people needed and to commit to publishing a regularly updated assessment of specialist housing needs, including analysis of current and projected need by type of specialist housing to avoid the evidence base underlying the Local Plan becoming outdated over time. Cambridgeshire County Council asked for an additional paragraph to be included within the supporting information to describe specialist housing.

Response to main issues raised in representations:

Policy H/SH must be seen as an integral part of a suite of policies that collectively will deliver a range of housing options for specific needs across a range of scales in a range of locations. Creating more independent living opportunities for older people and people with disabilities will be achieved by delivering more dwellings to meet their needs through both specialist housing schemes and more appropriate mainstream housing. Hence Policy H/SH will be complemented by policies to adapt mainstream housing (facilitated through accessibility standards) and ensure market housing is generally more spacious (through residential space standards).

The Local Plan includes specific requirements within Policy S/JH relating to the identified accommodation needs of travellers, older and disabled people, and students. Estimating the precise level of the full range of specialist housing required is dependent on many variables. Considering our latest evidence of the accommodation needs of older and disabled people as set out in [Housing Needs of Specific Groups Update for Greater Cambridge](#) (HNSG, 2025), strategic sites play an essential role in the strategy for meeting such needs. The Local Plan therefore includes a series of options for meeting the identified accommodation needs of older and disabled people, as it requires the provision of specialist housing within the strategic site allocations (as set out in the individual site allocation policies), includes a requirement for 10% of dwellings on unallocated strategic sites of 1,000 dwellings or more to be

delivered as specialist housing (as set out within Policy H/SH), and supports the delivery of specific proposals for specialist housing that are brought forward as windfall sites (and not part of larger schemes) provided they meet the criteria within Policy H/SH. Specialist housing needs will be kept under review with partners.

Our [Housing Needs of Specific Groups Update for Greater Cambridge](#) (HNSG, 2025) calculates the accommodation needs for older people and disabled people in the form of housing with support, housing with care, and nursing and residential care bedspaces. However, it is also important that a mix of specialist accommodation is provided for older people and people with disabilities from housing with support through to care homes, and that there is not an over-provision of one type of housing within an area, therefore any proposals for new specialist accommodation for older people or disabled people must be supported by evidence of a need in Greater Cambridge, and within the particular location of the proposed development, for the specific proposed specialist accommodation and its tenure. This evidence can take account of any evidence already published by the Councils. The view that health impacts and contributions should not be considered due to their overall net positive contribution to the costs of social care and health systems is not accepted. The local impacts could be very significant.

The supporting information has been amended to include a paragraph outlining the variety of groups that the specialist housing accommodation in this policy relates to, and makes use of the suggested wording from Cambridgeshire County Council.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue

<p>Support for policy as:</p> <ul style="list-style-type: none"> • appropriate housing can enable older people to stay in the local community longer, • need creative and innovative approaches to housing mix for different generations, so that older people have suitable housing and meeting places at the heart of communities, • these developments should contribute towards the delivery of affordable housing, • developers should be incentivised to provide this type of housing, • important that specialist housing requirements are clearly set out in policy. 	<p>201045 (P Spowart), 201645 (Stapleford PC), 202185 (M MacGinley), 201822 (St Andrews Church), 203747 (Cambridge Green Party), 211269 (Terra Strategic), 211567 (Martin Grant Land Ltd)</p>
<p>Specialist housing should be in sustainable sites with access to services and facilities. Request that planning decisions relating to large retirement living facilities or institutions take into consideration the number of units already provided via such facilities/institutions within an area to ensure that healthcare facilities are not overwhelmed and that neighbourhoods do not become dormitory communities with a top-heavy population pyramid.</p>	<p>210893 (Great Shelford PC)</p>
<p>Concerned the policy applies stricter criteria to older persons' housing than to general needs housing, which risks limiting delivery despite evidence of need. The requirement that specialist housing should be in walking distance of local centres or facilities is unreasonable and access to public transport should be sufficient.</p>	<p>201937 (Anchor Hanover)</p>
<p>Becoming more common for family homes to be occupied by elderly residents, who face practical impediments to down-sizing or re-locating, as well as very limited supply of high-quality and desirable seniors accommodation. Need more high quality, compact homes including sheltered housing for older people.</p>	<p>203281 (J Palmer)</p>

Support for policy objective but concern that requirement for provision on strategic sites alongside the additional criteria set out within the policy could impact on viability and deliverability.	204889, 210268 (Vistry Group)
Need clarity on the application of the policy to minor development.	208691 (Guilden Morden Developments Ltd)
Clarification is sought on the meaning of “unallocated strategic sites” as given the well documented and growing demand for all forms of specialist housing, it is considered that this policy requirement should apply to all strategic sites, rather than being limited solely to unallocated sites.	210540 (Cambridgeshire County Council)
This policy should be deleted as will be superseded by new NPPF requirements.	208320 (Churchill Retirement Living with McCarthy and Stone)
Policy requires applications to provide evidence of need, however it is well evidenced that the UK has an ageing population, and the Housing Needs of Specific Groups study identifies a large need in Greater Cambridge. Should not be required to demonstrate need.	208320 (Churchill Retirement Living with McCarthy and Stone)
Specialist housing developments help reduce costs to social care and health systems, therefore requirements to assess impact on healthcare services and/or make contributions should be removed.	208320 (Churchill Retirement Living with McCarthy and Stone)
Must be walkable to facilities and have no adverse impact on character of surrounding area.	202260 (Girton PC)
The threshold requiring specialist housing provision should be reduced from 1,000 dwellings.	203747 (Cambridge Green Party), 210540 (Cambridgeshire County Council)

Policy should be amended to stop developers avoiding specialist housing requirements by building out schemes in smaller packages	203747 (Cambridge Green Party)
Councils should commit to publishing a regularly updated assessment of specialist housing needs, including analysis of current and projected need by type of specialist housing and the overlap between specialist housing need and social housing need to avoid the evidence base underlying the Local Plan becoming outdated over time.	203747 (Cambridge Green Party)
The plan should include specific allocations in sustainable locations to meet the needs of older people.	205363 (Home Builders Federation)
The policy could go further and allocate suitable sites for specialist housing.	211269 (Terra Strategic)
The plan should set out an indicative figure, or a range, for the number of units of specialist housing for older people needed across the plan area throughout the plan period.	205363 (Home Builders Federation)
Where needs are not being met the policy should also state that the Council will apply a presumption in favour of development.	205363 (Home Builders Federation)
The text should include a summary paragraph describing specialist housing.	210540 (Cambridgeshire County Council)
Fully support policy and would seek further strengthening of the policy to ensure accommodation is designed with ergonomics in mind and garages/storage facilities meets principles for that can support a wide variety of wheelchairs and mobility scooters. Lifts should be fire insulated to enable effective entry and egress.	210332 (East of England Ambulance Service NHS Trust)

<p>Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.</p>	<p>204060 (S Rogers)</p>
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Policy H/CB: Self and custom build homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Most comments on this policy were from developers and focused on the 5% requirement for self and custom build homes on schemes of 20 or more dwellings, with a general theme that the policy approach needed to be more flexible to respond to demand as measured by the Greater Cambridge Self and Custom Build Homes Register. More specific comments included:

- Need a flexible, case-by-case approach to self-build and custom-build provision, working with developers, the self-build register and local groups to meet identified need.
- There is limited demand for self and custom build on large sites.
- The threshold for requiring self and custom build should be raised, or a sliding scale introduced, as the requirement is more burdensome on smaller schemes.
- Delivering self and custom build on larger sites can reduce the ability to design optimised layouts with standardised unit widths, depths and typologies resulting in lower densities, and reduced overall yield and increased costs.
- Self and custom build plots typically deliver more slowly than developer built units, causing delays in build out rates, sales receipts and s106/CIL trigger points.
- Self and custom build plots create difficulties around logistics, with self-builders developing alongside main contractors.

- Custom finish type approaches are already incorporated by developers into their standard delivery models so the policy requirement is placing an unnecessary and disproportionate burden on developers for no meaningful benefit.

There were also several comments that the policy should focus on addressing demand as expressed by the register and not on quotas. It was argued that the number of new applicants to the register has fallen in recent years and, therefore, the need for further permissions would fall over time. It was also argued that the demand on the register was focused on self build rather than custom build with a preference for smaller sites, which implies that the focus should be on smaller self and custom build specific sites rather than large, multi-tenure sites that are more likely to deliver through custom build or custom finish approaches. There was a suggestion that the policy should be expanded to capture the ability for sole self and custom-build proposals to be brought forward within or on the edge of settlements.

There was disagreement that self and custom build plots should be transferred to a Register Provider if they could not be sold for self and custom build development. It was argued this would affect viability, delay deliverability and result in an over-supply of affordable housing on the site. However, there was a contrary opinion that developers may discourage the take up of self and custom build plots or their transfer to Register Providers through artificially high prices.

It was suggested that the policy should integrate a condition and monitoring process to ensure that the initial occupants who were involved in the design do live there for a minimum period. If there was a breach any exempted biodiversity net gain requirements should be re-imposed.

There was a request that the exemption for affordable housing schemes be reduced to schemes of 50% affordable housing from 80% affordable housing due to the particular viability challenges and funding regimes facing these schemes.

Response to main issues raised in representations:

The recent fall in the number of applicants joining the Greater Cambridge Self and Custom Build Register is recognised. However, there remains a significant deficit in the number of permissions: 440 plots at the end of base period 7 allowing for permissions up to 30 October 2025. The supporting text to the policy states that “the 5% requirement may be reduced where at least a 1 year oversupply of custom and self-build housing permissions exists and subject to agreement with the local planning authority”. The scale of the deficit could reduce quite quickly if the number of new applicants to the register remains low. However, proposals for self and custom build developments continue to be allowed on appeal outside of defined development extents because South Cambridgeshire District Council cannot demonstrate that it is meeting its statutory requirement to match demand (as measured by the register) with permissions. The proposed policy approach of requiring 5% custom or self build plots on developments of 20 dwellings or more offers the best chance of reducing the deficit as quickly as possible, whilst taking a more flexible approach to the 5% requirement later in the plan period once there is no longer a deficit. The requirement that custom or self build plots which do not sell to continue to be marketed as such for a further period or transferred to a Registered Provider is considered to be an important control to ensure potential custom and self build dwellings are not lost to mainstream market housing.

Demand as measured by the Greater Cambridge Self and Custom Build Register does favour larger plots for detached houses with 4 or more bedrooms either as single plot sites or as part of a small development with a limited number of plots, where there is an opportunity to build closer to the traditional self build model rather than a customised approach. However, although the register does not apply a viability test, a review of data provided by applicants suggests that many would be unable to afford their aspirations given current plot values. It is also considered that meeting most of the current demand through small sites in the countryside would: have significant landscape impacts, undermine the sustainable development strategy for new homes proposed by the Local Plan, and have consequences for delivering rural exception sites. The

proposed approach offers a realistic compromise. Windfall sites will continue to come forward for those that can afford the plot values that small rural sites will command. However, these will be balanced with other sites, as part of larger developments, which can offer a mix of self and custom build opportunities at a range of price points. There were no suitable sites proposed specifically for custom and self build through the call for sites process.

It is important that biodiversity net gain requirements are applied where appropriate but there are practical limits to the extent of conditions and monitoring that can be applied. Section 106 agreements and/or planning conditions are already used to ensure custom and self build developments meet the legal definition of custom and self build. It is noteworthy that 49% of households on the Greater Cambridge Self and Custom Build Register suggested that higher environmental performance was a motivator for them wanting to build their own home.

The proposed policy sets out a range of housing schemes that will be excluded from the requirement to include custom and self build homes. Criteria 1a(ii) specifically excludes schemes where at least 80% of homes are affordable. This is designed to exclude rural exception schemes. However, it is recognised that there may be other schemes that are delivering higher than policy compliant levels of affordable housing which may create viability challenges when combined with custom and self build requirements. Supporting information has been added to highlight that custom and self build requirements may be lowered or waived, subject to viability evidence, where schemes are delivering affordable housing numbers that are at least 10% above policy requirements. Viability is likely to be affected by the types of affordable housing proposed with higher levels of the most affordable options, such as Social Rent, strengthening the case for a relaxation of custom and self build requirements.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
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<p>The policy is too restrictive and conflicts with PPG by focusing too much on delivery options with lower levels of input from the occupant on large sites whereas the custom and self build register shows demand is stronger for smaller sites offering more design input from the occupant.</p>	<p>202100 (M Asplin)</p>
<p>Policy criteria H/CB(3) is unsound because it unreasonably applies to all custom and self build developments placing unreasonable procedural and financial requirements on single plot developments.</p>	<p>202097, 202102 (M Asplin)</p>
<p>Custom and self build requirements should be increased to 10% on all master planned developments.</p>	<p>201001 (N Upstone)</p>
<p>Self-Build Plots should remain self-build plot designations and not be a means to provide market housing where it would otherwise be inappropriate.</p>	<p>211916 (C. Newell)</p>
<p>Marmalade Lane on Orchard Park demonstrates what is possible by allowing groups to go further than developers.</p>	<p>201001 (N Upstone)</p>
<p>Policy focuses too much on sites of 20+ dwellings:</p> <ul style="list-style-type: none"> • policy discriminates against individuals seeking to build small individual or collective plots, • Clauses 3a and 3b may reduce availability of self build plots if Councils valuation expertise insufficient, • Plots may not be taken up due to pricing issues rather than a lack of demand. 	<p>201516 (D Brock)</p>

Greater provision should be made on large sites. Large plots should be broken into smaller plots for small building firms and small architectural firms to build on.	203816 (A Carpen)
Self-build in villages should be small scale, fit with the character of the area and not breach the Green Belt.	202261 (Girton PC)
Support for policy but concern that plots could be converted to market housing after 12 months through inflated plot values stopping purchase by self-builders or transfer to Registered Providers.	201388 (Gamlingay PC)
Support for policy but seek a condition and a monitoring process to ensure that the initial occupants who were involved in the design do live there for a minimum period. BNG requirement should be re-imposed if condition breached.	203441 (Cambridge City Council Liberal Democrat Group)
Support for policy but clarification required on how policy applies to minor development.	208692 (Guilden Morden Developments Ltd)
<p>Policy should have more flexibility than blanket 5% approach where it can be demonstrated that there is limited demand and/or it would not support good placemaking. The threshold of 20 dwellings should be increased as:</p> <ul style="list-style-type: none"> • Self/custom buildings reduce the ability to design optimised layouts with standardised unit widths, depths and typologies resulting in lower densities and reduced overall yield and increased costs, 	204897 (Hill)

<ul style="list-style-type: none"> • There is no evidence of large demand for custom and self build on large housebuilder led schemes, • self/custom build plots typically deliver more slowly than developer built units, causing delays in build out rates, sales receipts and s106/CIL trigger points, • create difficulties around logistics, with self-builders developing alongside main contractors. 	
<p>Object to the mandatory requirement for 5% self-build homes as part of any development – this is inconsistent with the Act which focuses on demand registers not quotas. Self-build provision should only be sought on sites where there is a demonstrable need. A flexible approach should be taken to respond to the demand on the register.</p>	<p>204771 (Vistry), 204295 (Bellway Strategic Land), 204534 (Bellway Strategic Land), 203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204116 (Brookgate Land Ltd and Network Rail Infrastructure), 204127 (E W Pepper Ltd)</p>
<p>It is considered that the requirement for at least 5% of homes on schemes of 20 or more dwellings to be provided for self or custom build housing is excessive, and the delivery of these plots is likely to be onerous for small and medium sized sites and influence the viability of such schemes. This could have a knock-on effect on the delivery of windfall dwelling delivery, to the detriment of overall housing provision.</p>	<p>211291 (Woolsington One Ltd)</p>

<p>Requirement for 5% on sites of 20 or more dwellings is unduly prescriptive and does not reflect practicalities of delivery (sequencing, logistics, health and safety). The Councils have a shortfall that the adopted policy has been unable to address, therefore need an alternative solution. Suggest dedicated self and custom build sites, as this would also reflect market preferences.</p>	<p>208994 (Barratt Homes Northampton)</p>
<p>Impractical to deliver 5% on strategic sites, and there is not evidence of this level of demand. Developers need opportunity to provide lower proportion if there is not sufficient demand, not practical for placemaking or not viable.</p>	<p>209038 (Marshall Group Properties), 211568 (Martin Grant Land Limited)</p>
<p>Custom finish type approaches are already incorporated by developers into their standard delivery models so the policy requirement is placing an unnecessary and disproportionate burden on developers for no meaningful benefit.</p>	<p>204771 (Vistry), 204295 (Bellway Strategic Land), 204534 (Bellway Strategic Land), 203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 204116 (Brookgate Land Ltd and Network Rail Infrastructure), 204127 (EW Pepper Ltd)</p>
<p>Policy seems to prohibit custom finish or custom build in houses, which is contrary to national policy. Amendments sought to provide clarity that custom finish proposals can apply to both houses and flats where external design is fixed, whereas external customisation is generally not appropriate for flatted schemes.</p>	<p>208972 (Persimmon Homes East Midlands)</p>

<p>Need a flexible, case-by-case approach to self-build and custom-build provision, working with developers, the self-build register and local groups to meet identified need.</p>	<p>203120 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>
<p>A fall in new entries to the custom and self build register following the introduction of an administrative charge suggests the register over states demand and should be reviewed.</p>	<p>205376 (Home Builders Federation)</p>
<p>Requirements in the policy do not reflect the Councils evidence base. Significant decrease in entries being added to the register. Requirement for 5% on developments of 20 or more dwellings would significantly over supply against current evidenced demand.</p>	<p>208348 (Thakenham Homes Ltd)</p>
<p>Need to consider desires of those on the register – likely to be seeking plots on small scale developments rather than as part of larger schemes. Mismatch between supply and demand.</p>	<p>208349 (Thakenham Homes Ltd)</p>
<p>The 20 dwelling threshold is too low. The impact of difficulties and delays in deliverable self build is far greater on smaller than larger schemes where there is more scope for separation. The complexity and logistics of developing such sites alongside self-builders could also create significant difficulties:</p> <ul style="list-style-type: none"> • The development of single plots by individuals operating alongside multiple contractors and large machinery operating on-site raises both practical and health & safety concerns, 	<p>205376 (Home Builders Federation), 204295 (Bellway Strategic Land)</p>

<ul style="list-style-type: none"> • Unsold plots should not be left empty to the detriment of neighbouring dwellings or the whole development, • Any differential between the lead-in times/build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed/occupied dwellings resulting in customer dissatisfaction. 	
<p>Suggested that this policy is amended to have a 'sliding scale' for the percentage of self/custom build dwellings needed per site (i.e. a lower percentage on much larger scheme, as this will still provide a larger number of self/custom build dwellings). Alternatively raise the threshold from 20 dwellings to 70 dwellings.</p>	208335 (Gladman Developments)
<p>Threshold is too low, as requirement for 1 self/custom build plot on a development of 20 dwellings is an unnecessary burden for SME builders. Threshold should be raised to 100 dwellings or more, or if needed to meet demand specific allocations should be included.</p>	208361 (T Elbourn)
<p>Policy should be expanded to capture the ability for sole self/custom-build proposals to be brought forward within or on the edge of settlements within the Settlement Hierarchy. Given the demand for self/custom-build homes in Cambridgeshire, it is considered a more flexible policy that encourages the</p>	204387 (LVA)

delivery of such schemes would make an important contribution to housing land supply.	
Support in principle but exemption for affordable housing schemes should be reduced to schemes of 50% affordable housing from 80% affordable housing. These schemes can be particularly affected by viability and funding regimes.	204443 (Cambridge Investment Partnership (CIP))
The requirement that unsold plots should either be marketed for a further period or sold to a Registered Provider could make schemes unviable. It should be replaced with the option of the developer building these plots out after the initial marketing period if unsold.	208912 (Nightingale Land and Hil Residential)
The minimum 12 month marketing period before unused plots can revert to developer delivery is a significant delay on build programmes for sites needing timely delivery. This includes the need for bespoke legal agreements, plot passports, boundary definitions and management arrangements for self/custom build plots, causing higher legal and administrative overheads.	204897 (Hill)
Agree with 12 months marketing requirement, but if not sold should be able to be sold as open market plots. Already significant number of affordable homes being provided on major developments, and a change in tenure of a plot will require revised legal agreements that could cause unnecessary delays.	208335, 210712 (Gladman Developments)

Policy needs to include flexibility for developer to build out any plots not taken up after 12 months marketing.	208994 (Barratt Homes Northampton)
Policy artificially inflates affordable housing on schemes above policy compliant levels and potentially conflicts with Regulation 122(2) of the Community Infrastructure Levy Regulations (2010). Developer should be able to build out as market housing after initial marketing period.	208913 (Nightingale Land and Hil Residential)
The proposed requirement for further, undefined marketing beyond an initial 12 month marketing period before plots can revert to market housing also requires clarity and justification from the Councils.	211568 (Martin Grant Land Limited)
Support the use of design codes and plot passports, but mandating both for outline planning permissions is inflexible, and an either/or approach should be adopted.	208972 (Persimmon Homes East Midlands)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204062 (S Rogers)

Policy H/BR: Build to rent homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was recognition from some individuals and community groups that Build To Rent could play a role in some circumstances, particularly in contributing to a more varied housing mix. However, there were calls for management fees to be constrained to ensure it remained an affordable option and for sites to be focused on urban areas where the higher densities associated with Build to Rent were considered more appropriate. Two agencies concerned with promoting local growth, Cambridge Ahead and Cambridge Growth Company, were also supportive due to the potential for Build to Rent to contribute to the local housing stock. The latter called for a strengthening of the policy in relation to strategic sites, accessible locations and sites close to employment centres such as the Cambridge Biomedical Campus.

Developers were generally more wary of the policy. They wanted clarification of how Build to Rent related to mixed and balanced communities, what is meant by 'dominate' and whether the need to reflect the scale and location of surrounding uses rules out using Build to Rent to introduce an intentionally differentiated product to the market. Some called for the policy to be deleted as they were concerned the term 'dominate' could be used to restrict the quantum of development within schemes and unnecessarily restrict well designed development.

The view that the Cambridge housing market can potentially support 40% affordable units within Build to Rent schemes was challenged with the respondent arguing schemes should seek to deliver 20% affordable in line with national planning guidance.

There were also comments about the operation of Build to Rent schemes with suggestions that 3 year rental agreements were often inappropriate, 15 year covenants should be capable of being reviewed where viability was an issue, and that there should be no requirement for a single management operator, particularly on larger schemes.

Response to main issues raised in representations:

Build to Rent homes can respond to a need, by providing quality homes for those who wish to rent, which adds to the flexibility of the local housing market to respond to demand. Build to Rent homes can be provided within any residential developments (allocations or windfalls) provided that the proposed homes meet the requirements for residential developments as set out within various policies within the Local Plan, and the specific criteria within this policy.

The requirements within this policy seek to ensure that developments of Build to Rent homes support the development of mixed and balanced communities, whilst also responding to local demand.

Amendments have been made to the policy and supporting information to clarify that the assessment of the design quality and effect on local character of any proposed Build to Rent development will be considered against other policies in the Local Plan, but that the policy seeks to prevent harmful concentrations of Build to Rent and privately rented homes within an area or new development. Large concentrations of privately rented homes can result in the homes within an area being focussed on specific groups within the community, rather than a mix of groups, therefore limiting the ability to create mixed and inclusive neighbourhoods that meet a range of needs. Additionally concentrations of privately rented homes may limit residents' long term commitment to or integration within the wider community. However, it is recognised that Build to Rent developments need to be able to be of a size that enables them to be delivered and managed viably.

National planning guidance states that 20% is generally a suitable benchmark for the level of Affordable Private Rent homes to

be provided in any Build to Rent scheme, but that local authorities can set a different requirement if justified by evidence. Our viability evidence shows that the strong Greater Cambridge housing market will support 40% Affordable Private Rent in Build to Rent schemes.

The definition of Build to Rent within the NPPF 2024 states that “Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control”. However, in light of changes introduced in May 2026 through phase 1 of the Renters Right Act 2025, the reference to the length of a tenancy agreement has been removed from the policy as it is no longer possible to specify the length of a tenancy. A single management operator is preferred, and is consistent with the definition of Build to Rent in the NPPF 2024, however, the policy wording has been amended to allow some flexibility.

The Councils recognise that Build to Rent investors will most likely want to retain schemes for the long term in order to get a good long-term return on their investment. Our research has identified that covenant periods may be as short as 7 years, but are typically 10-15 years. Including a requirement for a covenant period of at least 15 years reflects the high priority that both Councils give to the issue of community sustainability and place-shaping.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Build to Rent schemes should deliver 40% affordable rather than 20% wherever possible. Concern that policy will allow developer to avoid providing 40% affordable on new sites.	205456 (R Robertson), 201389 (Gamlingay PC)

<p>Support for policy:</p> <ul style="list-style-type: none"> • as helps delivery of rental properties, • but management fees should remain reasonable, • particular support for commitment to deliver balanced mix of housing types and tenures. 	<p>202186 (M MacGinley), 203445 (Cambridge City Council Liberal Democrat Group), 203535 (Cambridge Ahead)</p>
<p>Affordable Private Rent is an oxymoron.</p>	<p>201046 (P Spowart)</p>
<p>Build to Rent often implies higher density and urban form and is not suitable for Minor Rural Centres such as Girton.</p>	<p>202262 (Girton PC)</p>
<p>Support for policy but the overall approach to Build to Rent should be strengthened in relation to allocations for strategic sites and in relation to promoting Build to Rent in accessible locations and close to key employment centres such as CBC.</p>	<p>203915 (Cambridge Growth Company), 208941 (Cambridge Growth Company)</p>
<p>Part (a) does not provide sufficient clarity and appears to be general design advice. If the intention is to monitor the mix of tenures in a wider area (rather than large new developments) then this should be made clearer, justified and clarity provided on how this will be assessed and implemented in practice. Need to explain how mixed and balanced communities applies to the Cambridge context.</p>	<p>203011 (Watkin Jones Group PLC)</p>
<p>Part 1a wording is vague. The term 'dominate' should be specifically identified so as to ensure consistent application of the policy to development proposals. Similarly, wording to encourage flexibility if there is a demand for the development type (i.e. C3) exists.</p>	<p>208693 (Guilden Morden Developments Ltd)</p>
<p>Support policy for Build to Rent, but needs clarification: assumed that 'scale and location' in part a relates to the spatial/physical characteristic, but some build to rent developments offer scope to</p>	<p>209203 (Urban & Civic)</p>

introduce a differentiated product, and therefore potential for missed opportunities if build to rent developments need to reflect scale and location of surrounding uses. Need to allow for build to rent developments that are deliberately differentiated from the surrounding context.	
Object to the conclusion that the Greater Cambridge Housing Market can support 40% private rent homes. The maximum requirement should be 20% in line with National Guidance.	208485 (Carter Jonas)
The imposition of rigid restrictions on development quantum as outlined in point (a) of the policy is not supported as risks unnecessarily constraining appropriate and well-designed development and fails to reflect the varied context and characteristics of individual sites. Reference to 'dominate' within the policy is not deemed appropriate as this inherently subjective and open to inconsistent interpretation.	203117 (Barrett David Wilson Homes & NW Cambridge Consortium of Landowners), 204133 (Brookgate Land & Network Rail Infrastructure)
The proposed approach of not prescribing a proportion of Build to Rent, but instead setting a criteria against which an application will be assessed is supported.	211569 (Martin Grant Land Limited)
Minimum 3 year rental agreements inappropriate. Target groups such as students and young professionals want shorter agreements.	208611 (Land Investment Holdings & Pigeon Land)
The policy requirements for a 15-year covenant and the availability of tenancies of up to 3 years are consistent with national guidance and industry practice. However, to ensure the policy is effective and does not inadvertently constrain delivery, suggest clarify that the 3 year tenancy is an option available to residents rather than a minimum term that must be taken, and that the covenant period can be reviewed where the scheme is demonstrated to be unviable or no longer capable of delivering Build to Rent use.	208973 (Persimmon Homes East Midlands)

Remove requirement for single management operator as impractical and/or undesirable for all build to rent units on large schemes.	208611 (Land Investment Holdings & Pigeon Land)
Support policy for Build to Rent, but needs clarification: part d requires developments to be managed by one operator, however, may be different operators for housing component and supporting uses, outdoor spaces or associated public realm. Non-housing component might beneficially be managed by a site wide estate management company.	209204 (Urban & Civic)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204064 (S Rogers)

Policy H/CO: Co-living

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The Cambridge City Council Liberal Democrat Group were supportive of the policy but wanted to see the role of space standards strengthened to improve the quality of developments. The Cambridge Green Party wanted to see a broader housing mix with less focus on single person studios and a clearer steer that community-led housing models would be supported for this type of housing to promote greater community control. Cambridge Ahead were supportive of co-living as part of a wider mix of tenures. An architects practice were concerned that the co-living policy may lead to sub-standard accommodation, and that co-living developments will be provided at the expense of other forms of housing.

A parish council argued that this type of development was not suitable for rural communities due to its urban high density typology. However, a developer counter-argued that co-living was a suitable housing type for many parts of rural Greater Cambridge provided adequate car parking was provided.

Developers and landowners wanted to see some of the policy criteria removed. It was argued that the upper limit of 200 units was too restrictive and that investors and operators often sought 250+ units. They asked for evidence to justify the proposed range of 50-200 units. There was a request for the minimum 3 month tenancy agreement to be eased and for the requirement to provide evidence of need to be deleted on the grounds that the Local Plan evidence base has already identified a need for single person units. It was suggested that the policy should be explicit that affordable housing requirements could also be provided through a commuted sum as well as a discounted rent option on some of the units.

Response to main issues raised in representations:

Co-living developments are purpose built and managed residential accommodation for rent that include a mixture of individual spaces and shared facilities. The likely residents of Co-living developments are single professionals or key workers aged 20-40, and / or are single person households that are new to an area. Co-living developments provide an alternative to Houses in Multiple Occupation or self-contained private rented accommodation, with the benefits of a wide range of services and facilities and all-inclusive bills. Co-living developments are therefore different to Co-housing developments, which are community-led developments where each household has a self-contained dwelling as well as access to shared community spaces. Co-living developments are not considered to be child or family suitable accommodation due to the units not being self-contained, and to prevent units being used as a sub-standard self-contained dwellings tenancies will be limited to single person occupancy.

The policy sets out that that developments 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. This reflects the likely residents of Co-living developments. The policy allows for Co-living developments to be brought forward outside of Cambridge, if the proposed Co-living development meets the requirement set out in the policy as well as the requirements of other policies in the Local Plan relating to residential developments.

Given there is a substantial overall housing need in Greater Cambridge, Co-living developments should not compromise the delivery of self-contained homes, and therefore the number of units within a Co-living development must be evidenced by need for this form of development in Greater Cambridge. Amendments to the policy have been made in relation to comments on scale, over concentration, dominate, and mixed and inclusive neighbourhoods to provide clarity.

Developments must be of good quality, well designed and contribute towards mixed and inclusive neighbourhoods. Proposals for Co-living developments should not result in a harmful concentration of Co-living units within an area or place undue pressure on local infrastructure. Where there are larger concentrations of Co-living developments or similar accommodation (such as purpose built student accommodation and / or Houses in Multiple Occupation) relative to conventional housing, these types of accommodation may be considered to be 'crowding out' conventional housing schemes, and it can also result in the homes within an area being focussed on specific groups within the community, rather than a mix of groups, therefore limiting the ability to create mixed and inclusive neighbourhoods that meet a range of needs.

There are no set space standards for Co-living developments, however, changes have been made to the policy and supporting information following further research and consideration by officers of the design of Co-living developments, and how comfortable, functional and accessible units can be provided whilst also ensuring that units are not capable of being used as self-contained homes. Additional detail has been added to the supporting text to refer to the existing standards for residential accommodation that should be considered in the design of Co-living units.

The affordable housing policy requires Co-living developments to contribute towards the delivery of affordable housing, as although these developments are not providing self-contained dwellings, they are contributing towards meeting our overall housing requirement and it is therefore important that they also contribute towards meeting Greater Cambridge's affordable housing need. Recognising that the provision of affordable housing on-site within a Co-living development is unlikely to be practical and off-site provision will deliver affordable housing that will meet a wider variety of local needs, the affordable housing policy (Policy H/AH) has been amended to set out that a financial contribution will be sought from Co-living developments that is comparable to the on-site delivery of affordable housing within other residential schemes.

In light of changes introduced in May 2026 through phase 1 of the Renters Right Act 2025, the reference to the length of a tenancy agreement has been removed from the policy as it is no longer possible to specify the length of a tenancy.

However, it is still important that safeguards are put in place through management arrangements so that Co-living developments do not effectively operate as a hotel or a hostel.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for policy, however, needs minimum space standards to avoid poor quality developments coming forward. Paragraph 9.85 should be amended to require co-living developments to meet the HMO bedroom standards rather than just to consider them.	203448 (Cambridge City Council Liberal Democrat Group)
The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome.	203537 (Cambridge Ahead)
Co-living is not suitable for Girton's rural environment as it is an urban high density typology.	202263 (Girton PC)
Amend the first sentence of clause 1d to require a mix of private living space layouts, broadening the policy beyond single-person studios.	203748 (Cambridge Green Party)
Amend clause 1h to explicitly allow co-living developments to be managed by resident-led bodies, Community Land Trusts, co-operatives or other non-profit models, not just commercial operators. This will make the policy more explicitly supportive of resident-owned and democratically governed co-living models, promoting greater community control.	203748 (Cambridge Green Party)
Clause 1c is too restrictive as it focuses on 50-200 units whereas investors/operators usually seek 250+ units. Justification required for scale of 50 to 200 units.	203591 (The Crown Estate), 208694 (Guilden Morden Developments Ltd)

The proposed approach of not prescribing a proportion of co-living units, but instead setting a criteria against which an application will be assessed is supported.	211570 (Martin Grant Land Limited)
Clause 1i is too restrictive as many operators offer monthly tenancies. The policy should instead include a clause requiring the developer to provide evidence of the need for the intended minimum tenancy period.	203591 (The Crown Estate)
Part b should be deleted. The housing needs assessment accepts a need for single person households. There is no clear planning-based need to manage housing unit sizes across an urban area.	203035 (Watkins Jones Group)
Part c should remove the upper cap. The housing needs assessment accepts a need for significant single person households. These developments meet that need and should not have caps.	203035 (Watkins Jones Group)
The policy should state that either financial contribution in lieu of affordable housing, or onsite discounted market rent co-living units, would also be acceptable. The application of 20% affordable housing should be promoted in the Local Plan for this specialist housing tenure.	203035 (Watkins Jones Group)
There is a contradiction in part 1a between 'where the development does not contribute to car dependency' and 'parking can be minimised reflecting the high level of accessibility'.	208694 (Guilden Morden Developments Ltd)
Co-living is suitable for many parts of rural Greater Cambridge but sufficient car parking will be required.	208694 (Guilden Morden Developments Ltd)
Opportunities for Co-Living developments like Marmalade Lane in Orchard Park should be included in master plans of greater than 250 dwellings.	201002 (N Upstone)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably. Makes Cambourne a lovely place to live.	204066 (S Rogers)

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

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

Many comments focused on how 'over concentration' should be defined. Some comments argue specific limits or thresholds should be placed on an area. Other comments, including by some of the University Colleges, raised concerns about impacts and whether the proposed policy approaches were justified. Concerns raised included parking, noise and antisocial behaviour. One comment highlighted these matters should be addressed through licencing. The need for diverse housing products was highlighted. Some comments requested that Article 4 Directions be issued so that planning permission would be required for small HMOs as well as large.

Response to main issues raised in representations:

Representations received are noted, including the diversity of views.

According to the Housing Act a House in Multiple Occupation (HMO) is a property that is rented by at least 3 unrelated people forming 2 or more households and sharing amenities including kitchens and bathrooms. HMOs for 5 or more people must be licensed, and the Councils publish a register of these HMOs. Cambridge City Council also hold details of known non-licensable HMOs. Licensed HMOs are required to meet specific standards – relating to the size of bedrooms and other rooms, and number of kitchens and bathrooms – depending on the number of occupants.

For planning, a small HMO (use class C4) is for 3 to 6 unrelated people, and a large HMO (use class sui generis) is for more than 6 unrelated people. A large HMO always requires planning permission. The change of use from a dwelling (use class C3) to a small HMO is 'permitted development' and therefore does not require planning permission.

To support the new Local Plan we commissioned a study to explore the number and distribution of HMOs within Greater Cambridge, the role of HMOs in meeting the housing needs of Greater Cambridge, the impacts of HMOs, and the potential solutions. This study shows that:

- HMOs form a key part of the housing supply in Cambridge, providing accommodation at a comparatively affordable rent for professionals, students and healthcare workers, especially in central Cambridge locations.
- HMOs also represent the most viable market-based housing option for those unable to access social housing.
- Evidence of concentrations in some areas, particularly around Mill Road and Anglia Ruskin University, strongly linked to the prevalence of older terraced housing and proximity to employment centres and universities.
- Areas with more HMOs are also locations likely to have wider amenity issues due to inner City and main road locations, and housing types (e.g. terraced homes). However, there appears to be no correlation between HMOs and crime or antisocial behaviour, and some correlation between HMOs and residential amenity (e.g. noise, rubbish). Correlation is not causation.
- Limited evidence of loss of family dwellings.
- Evidence base recommends policy approach that avoids sandwiching, minimises cumulative impacts and seeks appropriate design to ensure good quality HMOs are approved.

The adopted Cambridge Local Plan 2018 includes a policy for HMOs, that is used when any planning applications are submitted for HMOs. The new Greater Cambridge Local Plan carries forward this policy, with amendments, and applies it to the whole of Greater Cambridge.

The policy in the new Local Plan reflects the findings of the study and focuses on:

- avoiding 'sandwiching' i.e. there being a HMO either side of a non-HMO dwelling,
- ensuring HMOs are of a suitable quality,

- ensuring amenity impacts from HMOs are reduced,
- requiring appropriate management arrangements to be demonstrated.

Whilst some local planning authorities have planning policies restricting HMOs where the concentration goes above a certain threshold, this would restrict HMOs from areas where they may be suitable, and could have unintended consequences regarding knock on impacts for other areas, and on the affordability of accommodation.

The new Local Plan policy seeks to control any potential negative impacts, by setting out criteria to be considered on a case-by-case basis.

Whilst outside the plan making process, there is a strong case for developing an Article 4 Direction, so that small HMOs would also require planning permission. The policy is therefore drafted to enable it to be applied to all HMOs that require a planning application i.e. large HMOs, but also small HMOs if an Article 4 Direction issued.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Request that the policy includes a clear 10% concentration threshold within a defined radius.	206584 (Guest Road Residents Association), 203787 (The Guest Road Area Residents Association)
Definition of 'over-concentration' is not provided, and unclear why additional requirements regarding sandwiching and adjacent properties have been added. Further consideration needed in relation to finding the right approach to address the matter of potential harm to residential amenity. Need to allow for site specific circumstances.	208249 (Kings College), 208298 (Girton College)

<p>Request an Article 4 Direction for Petersfield and central Cambridge to remove permitted development rights for small HMOs and short-term lets. In Petersfield about a third of dwellings are HMOs, causing noise, anti-social behaviour, parking pressure, litter and waste-collection strain. The position that there is insufficient evidence is no longer valid given high HMO concentrations.</p>	<p>206587 (Guest Road Residents Association), 203787 (The Guest Road Area Residents Association)</p>
<p>HMOs are providing an affordable accommodation option, but are often a sub-optimal form of housing. HMOs are not a long term solution for young professionals and there needs to be greater consideration of this group – alternative models should be considered such as co-housing.</p>	<p>208009, 211009 (Cambridgeshire County Council)</p>
<p>Strict limits on the density of HMOs within an area should be imposed. Concentrations already too high in places, such as Orchard Park. High concentrations of HMOs can have a negative impact on neighbourhood quality - undermine placemaking, contribute to a transient population, and are associated with poor property maintenance.</p>	<p>208009, 211010 (Cambridgeshire County Council)</p>
<p>HMOs increase parking stress, undermine character, and create intensification. Strong limits on HMOs are needed, and require management plans and parking controls.</p>	<p>202264 (Girton PC)</p>
<p>Proposed policy H/MO 1(b) includes a prohibition on “three or more adjacent properties as HMOs”. This is unduly restrictive in the context of College accommodation in Cambridge City Centre, where there are many examples of high-quality rows of College owned HMOs. In certain roads in the City, this may be a better solution than “pepper potting” College HMOs across the City: better for residents as college can have better management and for students in term of community. Recommended that the restriction in</p>	<p>201746 (Christ’s College, Cambridge), 202051 (Trinity Hall), 204781 (St John’s College), 204020 (Jesus College)</p>

<p>1(b) be removed from the policy and that a more nuanced approach to defining over-concentration be included in the Supplementary Planning Document referenced in paragraph 9.97. Part 1a. is considered to be sufficient to avoid over concentration.</p>	
<p>Support for policy but request for policy qualification to be strengthened as HMOs are detrimental to community cohesion and quickly erode any sense of neighbourhood or neighbourliness because of their transitory nature. There should be a presumption against the conversion of c3 housing into HMO and new HMOs should not be part of the Local Plan. Instead build to rent apartment complexes with affordable offerings (and communal spaces) should be prioritised.</p>	<p>201824 (St Andrew's Church)</p>
<p>Comment made to specific planning application (25/03323/FUL) for proposed development of 23 double bedrooms. Comment notes that application does not mention demographic of residents or what management arrangement will be in place. The requirement to license HMOs that house 5 or more people, which is outside the planning system, is noted as seemingly unhelpful.</p>	<p>201888 (T Jewell)</p>
<p>Support policy but request made for the removal of references to C4 and Sui Generis to allow for automatic inclusion of smaller HMOs if Permitted Development regulations change or an Article 4 directive is implemented. Advocate for further work on this policy to establish an evidence base regarding the impact of converting smaller dwellings, ensuring the policy remains robust against potential national policy changes.</p>	<p>203454 (Cambridge City Liberal Democrat Group)</p>
<p>The Local Plan's commitment to delivering a balanced mix of housing types and tenures is welcome, particularly its focus on affordable housing to address Cambridge's long-standing</p>	<p>203539 (Cambridge Ahead)</p>

<p>challenges. The recognition of diverse housing options to meet differing needs, as highlighted by Cambridge Ahead's Young Advisory Committee, is positive.</p>	
<p>Support for policy covering Greater Cambridge and not just Cambridge City. Orchard Park specifically given as example which is over dense with HMOs and creating community tension. Do not want issues in Orchard Park replicated in Darwin Green or potentially Histon & Impington. Need to make sure the people who live in HMOs have access to good quality housing alternatives. Too high density of HMOs makes community universally less attractive.</p>	<p>204035 (Histon and Impington PC)</p>
<p>Policy needs specific detail about what 'over concentration' of HMOs means. Undefined 'over-concentration' is insufficient and makes refusals subjective.</p>	<p>204035 (Histon and Impington PC), 208695 (Guilden Morden Developments), 206586 (Guest Road Residents Association)</p>
<p>Suggestion that the 'over concentration' definition is applied to tiers within the Settlement Hierarchy in order for a proportionate approach to be taken. Similarly, 1.b. should be justified: the policy places an inherent negative stance on the 'sandwiching' of a C3 property by C4/Sui Generis HMO; however, compliance amenity matters in 1.a. would negate the need for 1.b. Part 2 of the policy is also presumptive, with the prevention of antisocial behaviour a requirement for retention of an HMO license; this is not a planning policy.</p>	<p>208695 (Guilden Morden Developments)</p>

Policy H/SA: Student accommodation

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

A number of colleges expressed concern about the impact of the policy on providing accommodation for part-time students. Girton PC considered there should not be further student accommodation in Girton and an individual highlighted that student accommodation is distorting the property market against the interests of residents. The Cambridge Green Party highlighted the need to clarify the position regarding need, and a potential inconsistency in how this is explained in the supporting information. There was one objection to restricting student accommodation on sites allocated for housing, including related to development viability. A query was also raised regarding how the loss of dwellings would be considered in light of the in lieu affordable housing contribution requirement. The Cambridge City Council Liberal Democrat Group sought a distinction between student and staff accommodation, and that any staff accommodation should adhere to residential space standards. One comment sought greater opportunities for local young people to benefit from institutional development.

Response to main issues raised in representations:

The Councils are aware that the University of Cambridge Colleges are increasing the availability and range of their part-time and flexible degree courses – these changes are being made in the context of Government policy proposals and also due to market dynamics. This means there is likely to be an increasing expectation on the Colleges to house more part-time students, as the Colleges are the principal providers of accommodation and related services for their student members on

degree level courses, including part-time degree courses with residential requirements. Amendments have been made to the policy and supporting information to exceptionally consider the provision of accommodation for part-time students on a case-by-case basis, where this meets the identified needs of an existing higher educational institution within Greater Cambridge. The policy continues to restrict occupancy to students attending full-time courses of at least one academic year, but this has been broadened to include “or part-time courses where permitted” as an exception in line with the associated changes made to other parts of the policy. Without the ability for the local planning authority to flexibly consider applications for accommodation for part-time undergraduate and / or postgraduate students (which is evidenced to meet the identified needs of an existing higher educational institution within Greater Cambridge) an inadequate amount and level of student accommodation may be able to be offered by the University of Cambridge Colleges for this student group. Without this flexibility in the policy, this need may have to be met by other housing sectors (principally the private rented housing sector), and this would likely increase demand for such housing, which will risk taking up accommodation potentially more suited to the general housing market needs in Greater Cambridge.

The provision of student accommodation to meet the identified needs of an existing higher educational institution within Greater Cambridge is supported, subject to the requirements within the policy being met, including that proposals have considered the scale and impact of the development on local residential amenity and on the character of residential areas. This ensures that where accommodation is to be provided, that any potential for conflict or negative impacts of the proposal on the surrounding areas is considered when making the decision on the planning application being considered.

The Councils have identified the accommodation needs of students and academic staff, and this is set out in Policy S/JH. The Councils have also considered the existing supply for accommodation for students and academic staff, and existing permissions and allocations (including strategic sites) are anticipated to deliver an over provision against the identified need. However, new proposals for accommodation for students and academic staff will continue to come forwards during the plan

period, and these proposals will be considered against this policy.

Given that there is an overall substantial need for housing in Greater Cambridge, the provision of student accommodation should not compromise the delivery of homes on sites allocated for housing or result in the net loss of market and affordable housing. An exception on a case-by-case basis for this restriction is not considered necessary due to the ability for proposals to provide evidence as part of the planning application process to demonstrate that a material consideration(s) exists to deviate from the policy.

Any self-contained dwellings, irrespective of their use class, are required to meet the residential space standards set out in Policy H/SS. However, there may be specific developments where meeting the required internal and external amenity space standards, and / or accessible and adaptable homes 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 anticipated occupants.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Additional student accommodation is not appropriate within Girton village. Eddington already contributes significant student/education pressure that increases traffic and conflicts with rural character. Avoid student accommodation allocations in Girton. Focus student housing on university-adjacent locations outside Green Belt.	207165, 207166, 202265 (Girton PC)

<p>The policy constrains expansion of part-time student provision. Cambridge University is expanding part-time courses and accommodating part-time students in line with Government policy. Students on part-time degree courses are members of Colleges, and because Colleges are the principal providers of accommodation and related services, there is an expectation on Colleges to house more part-time students. Some part-time courses require intensive teaching blocks and mandatory residence in Cambridge, particularly for students from overseas. Clauses 1a and 8 should permit part-time student accommodation for those with a residential requirement exceeding two days per week.</p>	<p>202049 (Trinity Hall), 202512 (University of Cambridge), 204016 (Jesus College Cambridge), 204787 (St John's College, Cambridge)</p>
<p>Objection to policy. Policy elements 1a-c are replicated by 4a-b and are therefore unnecessary. If 4a is satisfied, but then 4b is not possible for the educational establishment, and it would not be justified nor lawful to restrict occupation of the property. Suggestion to delete 1a-c and 4b.</p>	<p>203114 (Watkin Jones Group PLC)</p>
<p>The limitation of PBSA on sites allocated for housing, or with an extant planning permission for residential is not justified. There will be cases where traditional residential accommodation is not viable. Exceptional circumstances should also include an applicant being able to demonstrate that traditional forms of residential development is unviable in that instance.</p>	<p>203114 (Watkin Jones Group PLC)</p>
<p>Support for policy but request for distinction between student and staff accommodation. Staff accommodation should adhere to housing standards, including meeting space standards and access to private amenity space. Allowing 25% of the development for staff housing with smaller room sizes and limited amenities may lead to poor living conditions.</p>	<p>203457 (Cambridge City Council Liberal Democrat Group)</p>
<p>We welcome the commitment to affordable housing.</p>	<p>203457 (Cambridge City Council Liberal Democrat Group)</p>

<p>A definition of acceptable use for staff accommodation during term breaks is needed, as some universities have extended breaks. If staff accommodation is rented out as short-term visitor accommodation unrelated to the university, it should comply with policy J/VA.</p>	<p>203457 (Cambridge City Council Liberal Democrat Group)</p>
<p>Need to clarify the timing, type and location of the identified need for student housing. The statement “Our evidence demonstrates that there is a continued identified need for the development of new student accommodation and staff accommodation” implies that more student and staff housing is needed. On the other hand, the statement “For student accommodation, existing permissions and allocations (including strategic sites) are anticipated to deliver an over provision against the identified need” implies that the need is already being met or even exceeded. Editing and rewording is needed to resolve this apparent contradiction.</p>	<p>203749 (Cambridge Green Party)</p>
<p>Provision should be made for new facilities in larger developments that not only benefit the students but also residents. Provision should be made for developers and institutions to contribute towards a fund that pays for joint activities that bring visiting students together with local schools so that local young people benefit from the opportunities that might otherwise be restricted to visiting groups.</p>	<p>203818 (A Carpen)</p>
<p>Welcomes policy but seeks further information on 1d. The Council is invited to accommodate the role of contributions to affordable housing in lieu of, and how this is taken into account in determining whether development would lead to permanent net loss of C3.</p>	<p>208696 (JMS Planning and Development Ltd)</p>

Policy H/DC: Dwellings in the countryside

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was some support for the policy from Parish Councils with requests for various aspects of the policy to be strengthened. There were calls for a formal standard of what defines the required marketing to ensure adequate marketing is made and concern that the policy could be weakened by conversion of mobile home temporary permissions to permanent dwellings in the open countryside. There was also concern that the policy could erode the rural edges of villages.

There was a specific comment about the shortage of livery yards in South Cambridgeshire which was associated with a request that where stables are being converted to other uses, alternative provision must be made to rehouse the horses. Another specific point concerned windmills. It was argued that tall structures near to a working windmill are likely to have a detrimental effect and therefore consideration should be made where a site is within 400m of a working windmill. Reference is made to a relevant policy in the Histon and Impington Neighbourhood Plan as an example of good practice.

A couple of architects practices were concerned that the policy was in conflict with national policy although one of these referred to the latest draft NPPF. The other considered that both the current South Cambridgeshire Local Plan policy and the proposed draft were in conflict with the provisions of Class Q of the General Permitted Development Order (2015). They cited the example of large portal-frame barns that are poorly suited to residential use but still fall within Class Q. They argue that better schemes, including redevelopment rather than reuse, have been negotiated by securing a Class Q permission as a fallback position with the resulting permission being treated as a departure from policy.

A developer argued that the marketing requirements necessary for a change of use of redundant buildings to uses other than employment were unreasonable.

The Environment Agency recommend that the 'Reuse of buildings in the countryside for residential use' refers to the need to place restrictions on changes of use within flood risk areas.

Response to main issues raised in representations:

The criteria set out in the policy are considered to be sufficiently robust to stop unsustainable or inappropriate development. This includes any changes of use from a livery yard, where planning permission is required, as evidence would be required to demonstrate the benefits of this change.

The reference to a windmill is a very specific issue. It is unlikely to be affected by this policy as most dwellings and other buildings considered against the policy are unlikely to be particularly tall. The issue would also be considered against other policies including Policy GP/ST: Skyline and tall buildings. There is also scope for a Neighbourhood Plan to introduce a bespoke policy if it is considered to be an important local issue such as in Histon and Impington.

A final version of the NPPF has not yet been published therefore the policies in the Local Plan will not, at this stage, reflect the proposed NPPF 2025 changes. The proposed draft policy is not considered to be in conflict with the current NPPF or Class Q provisions. However, it is recognised that there could be situations where a building could secure permitted development under the Class Q provisions and that this will act as a fallback position. The supporting information has been amended to highlight the relationship between this policy and permitted development under the Class Q provisions.

The marketing requirements for a change of use of building in the countryside to residential use are considered to be reasonable and proportionate, and Appendix G of the Local Plan sets out expectations on what is required. The policy has an overarching aim to reduce unsustainable living patterns and minimise the carbon impacts of new housing.

The suggested amendments to refer to national flood risk guidance have not been included as this is considered a duplication of national planning policy and guidance and would not be appropriate.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Broadly supportive of policy.	201646 (Stapleford PC), 210958 (Great Shelford PC)
A formal standard of what defines the required marketing is needed to ensure adequate marketing is made.	201438 (Histon & Impington PC)
It is an unreasonable requirement to have to market a property for 12 months and not take the existing state of the property into account. The requirement for marketing information should be restricted to properties that are vacant but capable of accommodating employment uses, and which are not in poor condition.	208697 (Guilden Morden Developments Ltd)
Tall structures near to a working windmill are likely to have a detrimental effect therefore consideration should be made where a site is within 400m of a working windmill. The Histon and Impington Neighbourhood Plan HIM04 is an example of a policy regarding working windmills.	201438 (Histon & Impington PC)

Concern that this policy is weakened by conversion of mobile home temporary permissions to permanent dwellings in the open countryside. Request consideration of tightening of this policy to reduce incidences of increased permissions in the open countryside.	201390 (Gamlingay PC)
Dwellings in the countryside risk eroding rural edges and should be prohibited in the Girton gap.	202266 (Girton PC)
There is a shortage of livery yards in South Cambridgeshire. Where stables are being converted to other use, alternative provision must be made to rehouse the horses.	201721 (S Jeggo)
The existing policy is out of date and conflicts with the provisions of Class Q. The proposed policy appears to replicate this issue and therefore requires reconsideration.	204613 (NP Architects)
Recommend that the 'Reuse of buildings in the countryside for residential use' refers to the need to place restrictions on changes of use within flood risk areas. The following bullet point could be added to this section: "The buildings are located outside of Flood Zones 2 and 3 and outside areas of high surface water flood risk, or a site-specific Flood Risk Assessment demonstrates that the development will be safe for its lifetime, taking into account the effects of climate change."	211171 (Environment Agency)
Cambourne's perimeter bridleway provides excellent community facility for horseriders, walkers, runners, dogwalkers, families, cyclists to enjoy outdoors, nature and travel sustainably.	204067 (S Rogers)

Policy H/RM: Residential moorings

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

There was only one comment on this policy. However, the comment was actually focused on a residential mooring allocation from the adopted Local Plans rather than Policy H/RM: Residential moorings

Response to main issues raised in representations:

The residential moorings allocation from the adopted Local Plans was not carried forwards into the Draft Greater Cambridge Local Plan (2025) and this continues to be the case in the Proposed Submission Local Plan (2026). The reasons, as set out in the Sites Topic Paper 2025, are that the landowner stated that residential development is required to enable the marina / moorings, and this proposed development is unsuitable for the site, and our evidence found no specific need for more residential moorings. The criteria based policy will be used to assess any sites for residential moorings that do come forward.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Fen Road marina development (allocated in the Local Plans 2018) should not proceed as: <ul style="list-style-type: none">• need mains sewage in the Fen Road area,	203000 (Fen House Property Ltd)

- | | |
|---|--|
| <ul style="list-style-type: none">• properly maintained footways are needed, and towpath from Chesterton Abbey bridge to Water Lane requires maintenance, widening, and paving, and• the level crossing is near capacity for road traffic, leading to delays and congestion - the local authority should advocate for improved signalling to reduce downtimes. | |
|---|--|

Policy H/GT: Gypsy and Traveller and Travelling Showpeople sites

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of issues arising from Draft Local Plan representations:

The Cambridge Green Party called for Gypsy and Traveller families to have the opportunity to live close to family members and for proposals to be considered on a similar basis to other proposals for residential development. Cambridgeshire County Council has highlighted that there is a need to ensure there are no inequalities for these communities when providing permanent pitches, and have provided a list of specific criteria to be considered.

They also suggested that strategic sites should, in addition to providing permanent Gypsy and Traveller pitches, provide for both negotiated stopping places and transit sites. It has been highlighted that the Local Plan does not mention transit or temporary stopping places despite their being a need identified for them in the Accommodation Needs Assessment, and it was commented that any transit sites or temporary stopping places need to respond to the gap in provision and be well managed and maintained.

An individual felt that the policy requirements were too strict and would limit the number of sites coming forward. In contrast, a PC was clear that proposals must respect Green Belt, flood risk and rural landscape considerations. The Environment Agency have requested that 'essential utilities' specifically refers to 'mains foul drainage' as this should be provided where possible, and that the policy clarifies that any proposals for new Gypsy and Traveller pitches must not be located within Flood Zone 3.

The need for further sites was challenged on the grounds that current pitches are being advertised as homes for rent and that

many pitches are occupied by non Gypsy and Traveller families despite planning conditions requiring this being attached to the planning permission. There was criticism that current planning breaches were not being enforced and that this resulted in over-development which was breaking fire regulations, and that the policy does not contain mechanisms or safeguards to ensure that the first and subsequent occupiers are Gypsies and Travellers.

It was also argued that there is a spatial imbalance in the provision of pitches with most being in the north of the area and relatively few being in the south of the area, and that a better geographical spread would support community cohesion.

A housebuilder objects to the requirement for strategic sites to include Gypsy and Traveller sites. They argue that the need is in rural areas and is not generated by new settlements, and that the policy requirement goes beyond what is suggested in the evidence base. They also point to practical delivery issues with providing pitches within strategic sites and argue that the Local Plan viability assessment does not take into account the delivery of pitches within strategic sites. An individual has requested details on the potential locations of new traveller sites.

Response to main issues raised in representations:

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.

Reflecting national planning policy, the criteria based policy in the Local Plan aims to ensure fair and equal treatment for travellers, facilitate the travellers way of life, and respect the interests of the settled community, whilst also limiting the

development of traveller sites in the open countryside. The policy sets out a series of requirements to be considered when any new pitches or plots are proposed in Greater Cambridge, which includes that any pitches or plots are located in a sustainable location, with the design and layout of any new sites or yards providing healthy, safe and secure living conditions for their occupants. Additionally, the policy provides the opportunity for proposed occupants to set out why the proposed new pitch or site is necessary, including why their needs cannot be met on existing sites.

Gypsy and Traveller pitches and Travelling Showpeople plots can be located in the countryside provided that the requirements within the policy are met, and this therefore provides greater flexibility for these residential uses compared to other residential developments. Where there is already national planning policy, such as Green Belt and flood risk, the supporting information highlights that this will be used when considering planning applications.

The Councils are reviewing the occupation of traveller sites within Greater Cambridge, and will be taking relevant action where occupation of sites is not in line with the conditions set out in the approved planning permission. Planning permissions for traveller sites include conditions relating to the number of pitches/plots and caravans that must not be exceeded on the site and also relating to the occupants. These conditions relate to the first and any subsequent occupants.

Licensing of caravan and park home sites is required by separate legislation – the Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013 – and the site licence will include specific conditions relating to model standards, such as safety and welfare requirements.

The approach to meeting the identified needs of travellers is covered within the Strategy Topic Paper. The [Accommodation Needs Assessment 2024](#) (ANA 2024) sets out a series of options for meeting the identified accommodation needs of travellers, and the Councils have considered each of these options. Delivering traveller sites as part of strategic sites is part of the approach to meeting the identified needs, alongside windfall developments and optimisation of existing sites.

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. As the Councils have an identified need for traveller sites, it is important that strategic sites contribute towards their delivery. Traveller sites within / on the edge of strategic sites is akin to there being traveller sites on the edge of existing villages. The proposed percentage of traveller pitches within the overall number of dwellings on a strategic site is similar to the relationship between existing settlements and traveller pitches.

The policy allows for traveller sites to be provided both within strategic sites, but also on other land in close proximity to the strategic site. By including requirements for strategic sites to deliver traveller sites within the policy, this allows them to be considered from the outset and planned into the development. The existing strategic sites with planning permission all have conditions within the outline planning permission that refer to the delivery of housing to meet the needs of a variety of groups in the community, and this includes the needs of travellers.

The Viability Assessment 2026 has considered the delivery of traveller sites within strategic sites, and finds that it is viable to do that alongside the other plan requirements.

The ANA 2024 considered the need for transit sites and temporary stopping places, and concluded that there is a need to provide temporary places for travellers to stop but that there was only a limited need for transit site provision. The ANA 2024 also highlights that in general councils are moving towards providing temporary stop over areas and negotiated stopping to help meet short-term transit need rather than developing transit sites. A temporary stop over area is known land which can be used on a temporary basis, and where temporary facilities can be provided when the temporary stop over is in use, but which would not require planning permission. Similarly, negotiated stopping involves councils coming to an agreement with Gypsies and Travellers to allow them to use a piece of land as a temporary stopping place. As temporary stop over areas and

negotiated stopping do not require planning permission, there is no need to refer to them in the Local Plan.

In response to the Environment Agency, the suggested amendments to note that Gypsy and Traveller pitches should not be located within Flood Zone 3 are considered to be a duplication of national policy and therefore not considered appropriate. However, the supporting text has been revised to reflect that Gypsy and Traveller pitches are a vulnerable user, as this a particularly specific point. Policy CC/IW addresses mains sewerage connections and therefore a change to this policy has not been made.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Challenge case that there is unmet demand for Gypsy & traveller plots. Holiday mobile homes are advertised for rent on Smithy Fen and Moor Drove in Histon on Facebook and Rightmove.	202063 (I Grimshaw)
Current planning breaches should be enforced. Of current pitches that are occupied on Smithy Fen many are not occupied by those from the traveller community, they are privately rented. The closeness of caravans breaks fire safety regulations.	202063 (I Grimshaw)
Any such proposals must respect Green Belt, flood risk, and rural landscape.	202267 (Girton PC)
Recommend adding to the end of Point 1a “taking into account the needs and preferences of the proposed residents” so that a site is not refused simply because an alternative exists elsewhere in the Local Plan area, particularly where proximity to family members is important.	203752 (Cambridge Green Party)

<p>Recommend adding to Point 1g that proposals are to be considered against the same thresholds as standard settled accommodation, preventing refusal on grounds such as traffic where comparable built development would be permitted.</p>	<p>203752 (Cambridge Green Party)</p>
<p>Should require strategic sites to identify land for negotiated stopping and transit provision.</p>	<p>203752 (Cambridge Green Party)</p>
<p>Most Gypsy and Traveller sites in South Cambridgeshire are in the north of the district and there is an imbalance. A better geographical spread would support community cohesion.</p>	<p>208759 (E Diaz)</p>
<p>There is no mention of transit and temporary stopping place provision for Gypsies and Travellers despite the need for such being identified in the Traveller Accommodation Needs Assessment 2023-24.</p>	<p>203655 (R Robertson)</p>
<p>All Gypsy and Traveller pitches or Travelling Showpeople plots or transit or temporary stay sites on allocated or unallocated sites must be well designed, and any proposals for temporary or transit must:</p> <ul style="list-style-type: none"> • Fill a gap in the provision of such facilities across the country or respond to a known need such as proximity to a hospital, • Be planned to be well managed and maintained, • Set, and require application of, maximum stay dates of appropriate lengths. 	<p>203655 (R Robertson)</p>
<p>This policy sets quite a high bar for provision. The number of sites the travelling community actually get is small so there is a need to commit to providing more. The Gypsy & Traveller community have every right to their way of life, and to be treated without prejudice like the rest of us.</p>	<p>205082 (B Nicolson)</p>

It is recognised that strategic sites can play a part in meeting traveller needs.	211571 (Martin Grant Land Limited)
The identified need is overwhelmingly rural and not generated by new settlements, and the ANA explicitly recommends a criteria based policy and only lists inclusion within strategic sites as an option, not an evidence-led requirement. Part 3 of the Policy goes beyond the evidence base, and should be deleted.	208974 (Persimmon Homes East Midlands)
There are practical delivery problems with providing pitches within strategic sites – issues with finding 1-2 hectares within tight masterplans, integrating the pitches in a way that works operationally, and willingness of traveller households to relocate.	208974 (Persimmon Homes East Midlands)
The Viability Assessment does not take account of providing pitches within strategic sites.	208974 (Persimmon Homes East Midlands)
We welcome criterion 1g.	210180 (Historic England)
Need to provide information on potential location of Traveller sites and from which roads these sites be accessed.	205902 (P Harradine)
Two sites on the edge of the village are occupied as small travellers sites in breach of planning control. Planning applications were submitted for each of the sites. Neither application complied with planning policy.	209061 (Fowlmere PC)
The policy seeks to ensure that proposed occupiers of any site for which permission is sought will be members of the gypsy or traveller community, however the draft policy does not contain mechanisms or safeguards to ensure that subsequent occupiers are only members of the gypsy or traveller community.	209062 (Fowlmere PC)

<p>In the provision of permanent pitches, need to ensure there are no inequalities for these communities and therefore that:</p> <ul style="list-style-type: none"> • Sites are located within 1.5 miles of a primary school and 2 miles of a GP surgery, • Sites provide satisfactory amenity for neighbouring occupiers, • Pitch size facilitates good quality accommodation, • Sites include play provision, and that noise and disturbance are mitigated, • The health and safety of occupants are not put at risk from poor air quality, noise, contamination or flood risk. 	<p>210550 (Cambridgeshire County Council)</p>
<p>Have previously encountered issues in relation to foul sewage disposal at the permanent traveller sites in the area, as these sites are not connected to the mains foul sewage system, instead utilise multiple package treatment plants that produce inadequately treated final effluent. Pleased to see that section 2(f) includes the need for provision of essential utilities including drainage and sewerage, but unclear if the term 'essential utilities' refers to 'mains' sewerage as it is preferable that 'mains foul drainage' should be provided where possible. Would welcome establishing mains foul sewage system connection for pitches.</p>	<p>211172, 211173 (Environment Agency)</p>
<p>Recommend that this policy clarifies that any proposals for new Gypsy and Traveller pitches must not be located within Flood Zone 3. Annex 3 of the NPPF classifies caravans, mobile homes and park homes intended for permanent residential use as 'highly vulnerable' and table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change indicates that 'highly vulnerable' development should not be permitted within Flood Zones 3a or 3b.</p>	<p>211174 (Environment Agency)</p>