



Greater Cambridge Local Plan: Proposed Submission Plan

Sustainability Appraisal Appendix G

Cambridge City Council and South Cambridgeshire District Council

Final report
Prepared by LUC
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Appendix G

Alternatives considered for strategic policies and development management policies

G.1 This appendix describes the alternatives considered by the plan making team during the First Proposals and Regulation 18 Draft Local Plan stages, in relation to the strategic policies and development management policies included in the Local Plan. The appraisal of each of the strategic policies and development management policies included in the Proposed Submission plan is presented in Chapter 5 of this SA Report.

G.2 Where the alternatives are considered reasonable their appraisal is presented in this appendix. Where an appraisal of more than one reasonable alternative is included, the alternatives have been numbered to aid with the description of expected sustainability effects.

G.3 Please note that the alternatives considered for Policy S/DS: Development strategy are presented in Chapter 4 and Appendix C of this report.

G.4 At the end of this appendix, the SA recommendations made in relation to the policy approaches proposed in the First Proposals consultation document are reproduced, along with an explanation from the Councils about how they were addressed in the Draft Local Plan (Regulation 18).

Policy S/JH: New jobs and homes

G.5 Alternative option (Alternative 1) - Planning for the higher jobs forecast (2025) and level of homes associated with it. This alternative was not assessed as it was not considered to be reasonable. This is because while the higher jobs forecast could be possible, it is not the most likely future scenario. As such the Councils did not consider that it represented the objectively assessed need, and would therefore not be a reasonable alternative.

G.6 Alternative option (Alternative 2) - Planning for a lower housing need that does not meet the government's standard method local housing need figure. This alternative has not been assessed as it is not considered to be reasonable. This is because it would not support the most likely forecast for future jobs, and would not be compliant with national policy.

Policy S/SH: Settlement hierarchy

G.7 Alternative option (Alternative 1) – Having no limits on the scale of individual developments for all settlements was rejected as it could lead to unsustainable patterns of development. This option has not been appraised as it was not considered to be a reasonable alternative.

Policy S/DE: Defined development extents

G.8 Alternative option (Alternative 1) – Not including settlement boundaries and adopting a more flexible approach to settlement edges was rejected as it would not provide certainty regarding development proposals, could impact settlement character and result in gradual expansion of settlements into the countryside. This option has not been appraised as it was not considered to be a reasonable alternative.

Policy S/GB: The Cambridge Green Belt

G.9 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative due to the need to provide a clear policy framework specific to the Cambridge Green Belt.

Policy CC/SD: Sustainable development and the climate emergency

G.10 Alternative option (Alternative 1) – No policy and rely on national policy and guidance and the other policies in the plan. This was not considered a reasonable approach as national planning policy highlights that development plans should be proactive in their approach to climate change adaptations and mitigation. In addition, consultation responses at First Proposals requested clarification on how evidence of sustainable development should be presented as part of planning applications in Greater Cambridge.

Policy CC/NZ: Net zero carbon new buildings

G.11 Alternative option (Alternative 1) – No policy: Leaving the delivery of net zero carbon to Building Regulation Part L and the Future Homes/Buildings Standard. This option has not been appraised as it was not considered to be a reasonable

alternative because it does not fulfil the Councils' statutory duty set out in the Climate Change Act and Planning Act and will not enable Greater Cambridge to achieve its carbon budget. This option would also not deliver net zero carbon in line with the Paris Agreement 1.5°C trajectory.

Policy CC/DC: Designing for a changing climate

G.12 Alternative option (Alternative 1) – No policy: Rely on national guidance. This option has not been appraised as it was not considered to be a reasonable alternative because local authorities have a legal duty to include policies related to both climate change mitigation and adaptation, as contained within the Planning Act.

Policy CC/WE: Water efficiency in new developments

For residential development:

G.13 Alternative option (Alternative 1) – No policy: Rely on standard Building Regulations (125 litres per person per day). This option has not been appraised as it was not considered to be a reasonable alternative because it would not respond to the serious level of water stress in the area.

G.14 Alternative option (Alternative 2) – Implement the Building Regulations alternative standard (the current policy of 110 litres per person per day). This is not the preferred approach as, whilst this does seek to reduce water use, the level of reduction is not sufficient to respond to the pressure on water resources in the area.

For non-residential development:

G.15 Alternative option (Alternative 3) - No policy (there is currently no standard in Building Regulations for water efficiency in non-residential developments). This option has not been appraised as it was not considered to be a reasonable alternative because it would not respond to the level of water stress in the area.

G.16 Alternative option (Alternative 4)– Require a minimum water efficiency standard of two credits for category Wat 01 of BREEAM. This is not the preferred approach as whilst this does seek to reduce water use, the level of reduction is not sufficient to respond to the pressure on water resources in the area. The draft policy requires

lower levels of water consumption at non-residential developments, requiring five credits for Wat 01 of BREEAM.

Table G.1: Reasonable alternatives considered for Policy CC/WE: Water efficiency in new developments

SA Objective	2	4
1. Housing	0	0
2. Access to services and facilities	0	0
3. Social inclusion and equalities	0	0
4. Health	0	0
5. Biodiversity and geodiversity	+?	+
6. Landscape and townscape	0	0
7. Historic environment	0	0
8. Efficient use of land	0	0
9. Minerals	0	0
10. Water	+	+
11. Adaptation to climate change	0	0
12. Climate change mitigation	0	0
13. Air quality	0	0
14. Economy	0	0
15. Employment	0	0

Alternative option (Alternative 2): Implement the Building Regulations alternative standard (the current policy of 110 litres per person per day)

G.17 Alternative 2 sets a requirement of 110 litres per person per day in new residential developments. Although this is not as high as the standard under the draft policy, it will still help reduce pressure associated with residential development on water resources. Therefore, overall, this option is expected to have minor positive effects in relation to SA objective 10: Water.

G.18 This alternative option would help to minimise water abstraction, which can have adverse effects on aquatic habitats and biodiversity. Therefore, minor positive effects are expected in relation to SA objective 5: Biodiversity and geodiversity. The effects are recorded as uncertain because this option would not minimise water abstraction to the same extent as the draft policy.

Alternative option (Alternative 4): Require a minimum water efficiency standard of two credits for category Wat 01 of BREEAM

G.19 Alternative 4 requires a minimum water efficiency standard of two credits for category Wat 01 of BREEAM, which will help reduce pressure associated with non-residential development on water resources. Therefore, this option is expected to have minor positive effects in relation to SA objective 10: Water.

G.20 This alternative option would help to minimise water abstraction, which can have adverse effects on aquatic habitats and biodiversity. Therefore, minor positive effects are expected in relation to SA objective 5: Biodiversity and geodiversity.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

G.21 Alternative option (Alternative 1) – Progress policy direction as proposed as part of the First Proposals i.e. within a single policy covering flood risk and integrated water management. This is not the preferred approach given the consultation responses highlighting the individual importance of integrated water management and flood risk management. The proposed approach provides two detailed policies, one setting out the requirements for integrated water management, sustainable drainage and water quality (CC/IW) and one setting out requirements for managing flood risk (CC/IW). This will provide greater detail on what will be required in new developments in relation to integrated water management and flood risk.

Table G.2: Reasonable alternative considered for Policy CC/IW: Integrated water management, sustainable drainage and water quality

SA Objective	Alternative
1. Housing	0
2. Access to services and facilities	0
3. Social inclusion and equalities	0
4. Health	+
5. Biodiversity and geodiversity	+
6. Landscape and townscape	0
7. Historic environment	0
8. Efficient use of land	0
9. Minerals	0

SA Objective	Alternative
10. Water	+
11. Adaptation to climate change	++
12. Climate change mitigation	0
13. Air quality	0
14. Economy	0
15. Employment	0

Alternative option: Progress policy direction as part of the First Proposals, i.e. single policy covering flood risk and integrated water management

1.1 The single policy direction in the First Proposals covering flood risk and sustainable water management would have similar positive effects to the draft policy CC/IW. These include minor positive effects relation to SA objectives 4: Health and 5: Biodiversity and geodiversity given the support for the incorporation of SuDS in new development. A significant positive effect is expected in relation to SA objective 11: Adaptation to climate change given the integrated approach to water management which considers water efficiency, sustainable drainage and flood risk which will become increasingly important in light of climate change.

1.2 However, the single policy direction contained in the First Proposals document did not refer specifically to protecting and enhancing water quality. Therefore, only minor positive effects are expected in relation to SA objective 10: Water.

Policy CC/FM: Managing flood risk

G.22 Alternative option (Alternative 1) – Progress policy direction as proposed as part of the First Proposals, i.e. within a single policy covering flood risk and integrated water management. This is not the preferred approach given the consultation responses highlighting the individual importance of integrated water management and flood risk management. The proposed approach provides two detailed policies, one setting out the requirements for integrated water management, sustainable drainage and water quality (CC/IW) and one setting out requirements for managing flood risk (CC/FM). This will provide greater detail on what will be required in new developments in relation to integrated water management and flood risk.

Policy CC/RE: Renewable energy projects and infrastructure

G.23 Alternative option (Alternative 1) – Include a map-based policy to identify areas as suitable in principle or unsuitable for renewable energy projects based on landscape sensitivity evidence prepared for the plan. Given the range of planning considerations relevant to assessing the suitability of renewable energy projects, it was judged that a more general framework approach for considering projects would allow for more effective decision making that can better respond to site-specific constraints on a case-by-case basis. This type of approach would also best align with requirements of national policy to set out a positive strategy for energy from renewable and low carbon sources.

G.24 Alternative option (Alternative 2) – No policy: Rely on national guidance. This option has not been appraised as it was not considered to be a reasonable alternative. This is because it would not be in accordance with the NPPF.

Table G.3: Reasonable alternative considered for Policy CC/RE: Renewable energy projects and infrastructure

SA Objective	1
1. Housing	0
2. Access to services and facilities	0
3. Social inclusion and equalities	+
4. Health	+
5. Biodiversity and geodiversity	+
6. Landscape and townscape	+
7. Historic environment	+
8. Efficient use of land	+
9. Minerals	0
10. Water	+
11. Adaptation to climate change	0
12. Climate change mitigation	++?
13. Air quality	+?
14. Economy	0
15. Employment	0

Alternative option (Alternative 1): Map-based policy to identify areas as suitable in principle or unsuitable for renewable energy projects

G.25 It is assumed that Alternative 1 would comprise similar wording as the draft policy but would adopt a map-based approach to provide more definition for the areas that renewable energy would be supported in principle or not. Therefore, many of the same effects are applicable for this option. This includes minor positive effects expected in relation to SA objectives 3: Social inclusion and 4: Health given the support for connections to district heating within the 2025 Heat Network Zoning Study boundary. This approach is likely to help address fuel poverty which is an indicator of deprivation. Minor positive effects are expected in relation to SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape, 7: Historic environment, 8: Efficient use of land, and 10: Water. This is because in line with the policy consideration must be given to residential amenity (including potential impacts caused by noise, vibration, and air quality), landscape, tranquillity and sensitive views, highways safety, biodiversity and geodiversity, the best and most versatile land, water quality and flood risk, in the development of the aforementioned criteria.

G.26 Alternative 1 is likely to provide increased protection for landscape character in the plan area by helping to direct development away from areas of greatest sensitivity. Therefore, there is potential for the minor positive effect for SA objective 6: Landscape and townscape to be strengthened. However, this option could introduce further uncertainty in relation to supporting the transition to energy generation from renewable sources and reductions in air pollution. There is potential to increase strain on electricity infrastructure if certain areas are identified as potentially more suitable for development for renewables and growth is focused towards these areas. It is like that upgrades to the relevant infrastructure could be achieved to avoid impacts of this nature. Therefore, further uncertainty is attached to the positive effects expected in relation to SA objectives 12: Climate change mitigation and 13: Air quality for Alternative 2.

Policy CC/CE: Supporting a circular economy and sustainable resource use

G.27 Alternative option (Alternative 1) – No policy: Leave to the Minerals and Waste Plan. This is not the preferred approach as the Minerals and Waste Plan does not give consideration to construction waste and as such there would be a policy gap in relation to this important element of achieving net zero carbon. It is not appraised in the SA given that the Minerals and Waste Plan has been subject to its own environmental assessment.

Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

G.28 Alternative option (Alternative 1) – No policy: Leave the protection and enhancement of carbon sinks to existing policy related to sites of nature conservation importance. This is not the preferred approach as not all sites of importance for their role as carbon sinks will be covered by designations to protect their nature conservation importance, so this approach could still lead to the loss of areas of land that act as carbon sinks. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that national policy has been subject to its own detailed environmental appraisal.

Policy BG/BG: Biodiversity and geodiversity

G.29 Alternative option (Alternative 1) – Rely on national legislation, which requires a 10% mandatory biodiversity net gain.

G.30 Alternative option (Alternative 2) – Require biodiversity net gain higher than 20%. This alternative is not the preferred approach as it would be likely in most instances to require significant off-site measures, whereas the national approach to net gain prioritises on-site measures. Requiring high net gain might also negatively affect development viability.

G.31 Alternative option (Alternative 3) – Rely on national policy for protection of sites of biodiversity importance. Through this option biodiversity net gain requirements would apply as set out in the draft policy. This alternative is not the preferred approach as the Councils consider that additional clarity is required to explain how the principles set out in national policy should be applied at a local level.

G.32 Alternative option (Alternative 4) - Require 20% BNG for minor and major development. This alternative is not the preferred approach as in practice it is often not deliverable or viable for smaller sites to deliver even 10% BNG onsite (smaller sites constrained by available open space have fewer opportunities to deliver biodiversity net gain and will likely require an off-site solution even when delivering a minimum of 10% biodiversity net gain).

Table G.4: Reasonable alternatives considered for Policy BG/BG: Biodiversity and geodiversity

SA Objective	1	2	3	4
1. Housing	0	-?	0	-?
2. Access to services and facilities	0	+	0	+
3. Social inclusion and equalities	0	0	0	0
4. Health	0	+	0	+
5. Biodiversity and geodiversity	+	++	+	++
6. Landscape and townscape	0	0	0	0
7. Historic environment	0	0	0	0
8. Efficient use of land	0	0	0	0
9. Minerals	0	0	0	0
10. Water	0	0	0	0
11. Adaptation to climate change	0	+	0	+
12. Climate change mitigation	0	0	0	0
13. Air quality	0	0	0	0
14. Economy	0	-?	0	-?
15. Employment	0	0	0	0

Alternative option (Alternative 1) Rely on national legislation, which requires a 10% mandatory biodiversity net gain

1.1 Alternative 1 is reliant on national policy, which requires 10% biodiversity net gain in all developments. Therefore, although this option supports an increase in biodiversity, it does not support as large an increase in biodiversity as the draft policy and is unlikely to lead to substantial green space provision. However, it is expected that designated sites would still be protected by the plan. Overall, minor positive but uncertain effects are expected in relation to SA objective 5: Biodiversity and geodiversity.

Alternative option (Alternative 2) Require biodiversity net gain higher than 20%

1.2 Alternative 2 requires all types of development to achieve biodiversity net gain higher than 20% and is therefore expected to have the same effects as the draft policy, but to contribute more towards the significant positive effects recorded against SA objective 5: Biodiversity and geodiversity. Minor positive but uncertain effects are expected in relation to SA objectives 2: Access to services and facilities, 4: Health

and 11: Adaptation to climate change given the potential to provide accessible green space which would provide opportunities for recreation and exercise and could support infiltration of surface water.

1.3 The requirement to achieve biodiversity net gain higher than 20% could make certain developments unviable and therefore minor negative but uncertain effects are expected in relation to SA objectives 1: Housing and 14: Economy.

Alternative option (Alternative 3) Rely on national policy for protection of sites of biodiversity importance

1.4 Alternative 3 would result in local policy to require the achievement of biodiversity net gain. However, local policy to ensure the protection of biodiversity sites would not be set out. Policy at national level will continue to apply for the protection of these sites. It is recognised that this option would not provide the significant positive outcomes that Alternative 2 would bring in terms of protecting biodiversity designations in the plan area, given the lack of locally specific policy.

Alternative option (Alternative 4) Require 20% biodiversity net gain for minor and major development

1.5 Alternative 4 requires minor and major developments to achieve 20% biodiversity net gain. It is therefore expected to have the same effects as Alternative 2, but to contribute more towards the significant positive effects recorded against SA objective 5: Biodiversity and geodiversity, as it requires minor developments to also provide 20% biodiversity net gain as opposed to 10%. Minor positive but uncertain effects are expected in relation to SA objectives 2: Access to services and facilities, 4: Health and 11: Adaptation to climate change for the reasons outlined in relation to Alternative 2.

1.6 However, the requirement to achieve 20% biodiversity net gain on minor developments could make certain types of development unviable. Therefore, minor negative but uncertain effects are expected in relation to SA objectives 1: Housing and 14: Economy.

Policy BG/GI: Green and Blue infrastructure

G.33 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because national planning policy requires local plans to address green infrastructure.

G.34 Alternative option (Alternative 2)– Identify the green infrastructure strategic initiatives in a supplementary planning document rather than the plan itself. This alternative is not the preferred approach, as it would not provide such strong support for the initiatives.

G.35 Alternative option (Alternative 3) – Restrict development within respective green infrastructure strategic initiative areas. This option has not been appraised as it was not considered to be a reasonable alternative because the strategic initiatives include very broad areas within which it would not be appropriate to restrict development.

G.36 Alternative option (Alternative 4) – Include an urban greening factor in the policy. This alternative was considered at the First Proposals stage and was not the preferred approach, as the Councils thought that measurement of Biodiversity Net Gain and Urban Greening via a metric-based assessment system would be likely to overlap. However, given that biodiversity net gain has been a mandatory requirement now for a few years, and the use of Urban Greening Factors are recommended in the national Natural England Green Infrastructure Framework, the Councils have decided to include an urban greening factor in the Regulation 18 draft policy. Therefore, this has been considered within the appraisal of the current draft policy.

Table G.5: Reasonable alternative considered for Policy BG/GI: Green and Blue infrastructure

SA Objective	2
1. Housing	0
2. Access to services and facilities	+
3. Social inclusion and equalities	+
4. Health	+
5. Biodiversity and geodiversity	++
6. Landscape and townscape	++
7. Historic environment	0
8. Efficient use of land	0
9. Minerals	0
10. Water	+
11. Adaptation to climate change	+
12. Climate change mitigation	+
13. Air quality	0
14. Economy	+

SA Objective	2
15. Employment	0

Alternative option (Alternative 2) Identify the green infrastructure strategic initiatives in a supplementary planning document rather than the plan itself.

1.7 The draft policy appraised at the Draft Plan stage identified priorities for enhancing the green infrastructure network within Greater Cambridgeshire and requires all new development proposals to demonstrate how they protect and enhance green infrastructure. Where green infrastructure cannot be delivered on site, applicants will need to contribute to offsite provision either financially or through planning conditions/obligations. Strategic developments will be encouraged to seek accreditation under the Building with Nature Standards. Major residential developments should achieve the minimum Green Factor of 0.4. The protection and enhancement of green infrastructure will support net gains in biodiversity by increasing ecological connectivity. In addition, the policy requires consideration of connectivity and local priorities for wildlife. Therefore, significant positive effects are expected in relation to SA objective 5: Biodiversity and geodiversity.

1.8 The policy sets out that green infrastructure provision should help create a sense of place and consider the context and character of the local environment. The policy is therefore expected to help enhance the landscape and townscape, whilst ensuring the green infrastructure is appropriate to its local context. Therefore, significant positive effects are expected in relation to SA objective 6: Landscape and townscape. Green infrastructure comprises a network of green spaces and the policy requires it to be multifunctional. It is therefore likely that the delivery of green infrastructure will include areas of open green spaces for members of the public to use for recreational purposes and green corridors which may be used for active modes of transport such as walking and cycling. The support of areas for recreation and active travel is expected to have beneficial effects on the health and wellbeing of the local population. Green infrastructure can also contribute to mental wellbeing, and provision of food growing space, including allotments, can encourage healthy eating. As such, minor positive effects are expected in relation to SA objectives 2: Access to services and facilities and 4: Health. Minor positive effects are also expected in relation to SA objective 3: Social inclusion and equalities because the provision of green infrastructure, including on site for major developments may help to encourage social interaction and inclusion for members of the community.

1.9 Minor positive effects are expected against SA objective 10: Water because the promotion of green and blue infrastructure will help to indirectly protect and enhance the water environment by reducing surface water runoff and filtering pollutants.

Furthermore, the policy sets out that green infrastructure should improve the quality of the immediate natural environment, which would include the water environment. However, the policy does not specifically refer to the need to protect and enhance blue infrastructure, which includes all types of waterbodies. Significant positive effects are expected in relation to SA objective 11: Adaptation to climate change and 12: Climate change mitigation as the policy requires green infrastructure to be resilient and respond to the climate emergency in a positive, contributory way. The provision of green and blue infrastructure will support climate mitigation and adaptation, by helping to reduce surface water runoff and flooding, providing shading, providing carbon sequestration, and may also help reduce the need to travel by car by making walking and cycling more attractive. Trees and vegetation will help filter pollutants from the air, and the promotion of active travel will help reduce vehicle related emissions. Therefore, minor positive effects are also expected in relation to SA objective 13: Air quality. Lastly, green infrastructure is likely to entice people to the area, including workers, which has the potential to increase productivity and generate inward investment. Therefore, minor positive effects are also expected in relation to SA objective 14: Economy.

1.10 Alternative 2 is expected to have similar effects as what was described for the draft policy at the Draft Plan stage, although it is acknowledged that the green infrastructure strategic initiatives would be presented in a Supplementary Planning Document (SPD) rather than the Plan itself, and therefore some of the positive effects are minor rather than significant.

Policy BG/TC: Improving tree canopy cover and the tree population

G.37 Alternative option (Alternative 1) – Rely on national policy. This alternative is not the preferred approach as it would not provide protection for trees of amenity or other value that are not part of ancient woodland or having Tree Protection Order status. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to assess the effects of national policy.

G.38 Alternative option (Alternative 2) – Set a specific requirement for tree canopy cover in new development. This alternative was considered at the First Proposals stage and was not the preferred approach as high canopy cover requirements could mean that woodland would dominate a development site's landscape and biodiversity provision, at the expense of a more biodiverse mix of habitats and landscapes. However, given that including standards for Tree Canopy Cover are now recommended in the national Natural England Green Infrastructure Framework, the

Councils have decided to include a tree canopy cover requirement in the Regulation 18 draft policy. Therefore, this has been considered within the appraisal of the current draft policy.

Policy BG/RC: River corridors

G.39 Alternative option (Alternative 1) – Not to have a specific river corridors policy, relying instead on overarching green infrastructure and landscape policies (no policy). This alternative is not the preferred approach because of the need to ensure that the important cross-cutting role that our river corridors play in relation to biodiversity, landscape, heritage, recreation and tourism is protected and enhanced. A no policy approach would result in national policy being applicable along with the overarching green infrastructure and landscape policies in the plan. This approach has not been appraised in the SA given that it is not the role of this SA to assess the effects of national policy. Furthermore, this option would not result in any sustainability effects over and above the expected baseline position without the plan.

Policy BG/PO: Protection of open spaces

G.40 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative. This is because it would not plan positively for the provision of open space, which is required by national planning policy and would damage the character and quality of life in settlements.

Policy BG/EO: Providing and enhancing open spaces

G.41 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative. This is because the NPPF requires local authorities to plan positively for the provision of open space, which would not be achieved through this option.

Policy WS/MU: Meanwhile uses during long term redevelopments

G.42 Alternative option (Alternative 1) – No policy. This is not the preferred approach because it would not encourage a sense of community early on in major new

developments or maximise opportunities provided by vacant sites. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

G.43 Alternative option (Alternative 2) – Policy that only relates to phased development on major sites. This is not the preferred approach because it would not enable the Councils to maximise opportunities provided by vacant sites.

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

G.44 Alternative option (Alternative 1) – No policy. This is not the preferred approach because it would not contribute towards maximising opportunities to respond to the skills issues identified in Greater Cambridge. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy WS/HS: Pollution, health and safety

G.45 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because these are key planning issues that need to be addressed to ensure the creation of healthy places.

Policy GP/PH: Protection of public houses

G.46 Alternative option (Alternative 1) – No policy. This option is not the preferred approach. The adopted local plan policies which protect public houses have reduced the loss of safeguarded public houses. If there was no future policy to safeguard these sites/uses, there is significant risk of additional losses. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy GP/PP: People and place responsive design

G.47 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative due to the

requirement for plans to set out a clear design vision and provide clarity about design expectations.

Policy GP/LC: Protection and enhancement of landscape character

G.48 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative as policy guidance is needed to guide how landscape issues are addressed in planning decisions.

Policy GP/QD: Achieving high quality development

G.49 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative due to the need to respond to local design issues.

Policy GP/HD: Housing density

G.50 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because the National Planning Policy Framework requires plans to address housing density and the efficient use of land.

G.51 Alternative option (Alternative 2) – Apply a blanket density across whole plan area. This option has not been appraised as it was not considered to be a reasonable alternative because it would not reflect the range of settlements, and their differing characteristics, within Greater Cambridge.

Policy GP/ST: Skyline and tall buildings

G.52 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because the National Planning Policy Framework requires plans to include policies that are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

Policy GP/QP: Establishing high quality landscape and public realm

G.53 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative due to the need to respond to local issues.

Policy GP/HE: Historic Environment

G.54 Alternative option (Alternative 1) – No policy and rely on national policy. This was not the preferred approach because the creation of a local historic environment strategy should be undertaken by the Local Planning Authority, as reflected by Paragraph 203 of the NPPF, which states that Local Plans should ‘set out a positive strategy for the conservation and enjoyment of the historic environment’. Given that the alternative does not align with national policy it has not been appraised.

Policy GP/HA: Designated Heritage Assets

G.55 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative. Paragraph 203 of the National Planning Policy Framework, states that Local Plans should ‘set out a positive strategy for the conservation and enjoyment of the historic environment ... [that takes into account] ... sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation’.

Policy GP/ND: Non-designated Heritage Assets

G.56 Alternative option (Alternative 1) – No policy and rely on national policy. This is not the preferred approach because national planning policy does not provide applicants with details of local historic environment records of non-designated heritage assets in Greater Cambridge, and consultee comments (including Historic England) requested that the Local Plan addressed non-designated heritage assets more explicitly. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy GP/CC: Adapting Heritage Assets to Climate Change

G.57 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative, as given the scale of heritage assets in the area, and the challenge of climate change, a policy is needed.

Policy GP/AR: Archaeology

G.58 Alternative option (Alternative 1) – No policy and rely on national policy. This is not the preferred approach given consultee requests that the Greater Cambridge Local Plan is clearer on the matters of archaeology in policy – the policy approach is intended as an application of national planning policy in a local context. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy GP/SF: Shopfronts

G.59 Alternative option (Alternative 1) – No policy and rely on national policy. This is not the preferred approach because national planning policy does not provide specific guidance in relation to shopfront, and consultee comments requested that the Local Plan explicitly addressed the design of shopfronts. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy J/NE: New Employment Development Proposals

G.60 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because it would not provide adequate policy guidance and would fail to support the economy, including the rural economy. It does not align with national policy which requires that planning policies should make sufficient provision for employment development.

Policy J/RE: Supporting the Rural Economy

G.61 Alternative option (Alternative 1) – No policy. This is not the preferred approach as it would not provide sufficient support for land-based businesses or the re-use of buildings. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

G.62 Alternative option (Alternative 2) – Greater flexibility for residential uses of rural buildings. This is not the preferred approach as it would reduce opportunities to support the rural economy and instead encourage residential development in the countryside where there is greater reliance on the private car.

Policy J/AL: Protecting the Best Agricultural Land

G.63 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because national planning policy requires the impact of development on agricultural land to be considered.

Policy J/PB: Protecting Existing Business Space

G.64 Alternative option (Alternative 1) – No policy: Allow employment land to be changed to other uses without restriction. This is not the preferred approach as it is considered there is a need to protect employment sites. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy J/AW: Affordable Workspace and Creative Industries

G.65 Alternative option (Alternative 1) – No policy. This is not the preferred approach as the market has not provided a sufficient supply of small workspaces to meet demand for such spaces in Greater Cambridge. A no-policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy J/EP: Supporting a Range of Facilities in Employment Parks

G.66 Alternative option (Alternative 1) – No policy. This is not the preferred approach due to the need to support the ancillary facilities that make business parks and campuses more effective. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy J/RC: Retail and other complementary town centre uses

G.67 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because in the Council's opinion, consideration needs to be given to the different centres, along with the shops and services they provide, which are essential in supporting the long-term vitality and vibrancy of centres.

Policy J/SA: Cambridge City's Primary Shopping Area

G.68 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because national policy requires that planning policies define the extent of primary shopping areas, and make clear the range of uses permitted in such locations.

Policy J/MS: Markets and Street Trading

G.69 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because national policy requires that planning policies retain and enhance existing markets and, where appropriate, re-introduce or create new ones.

Policy J/VA: Visitor Accommodation, Attractions and Facilities

G.70 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because the sustainability and amenity impacts of visitor accommodation, as well as the significant role of tourism in Greater Cambridge, mean that policy guidance is required.

Policy J/FD: Faculty development and specialist/language schools

G.71 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because it could result in unsustainable development, such as the location of new faculty developments in locations with poor accessibility. Additionally, there would be no mitigation measures for reducing the impact of new development.

Policy H/AH: Affordable housing

G.72 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because the National Planning Policy Framework states that planning policies should specify the type of affordable housing that is required.

G.73 Alternative option (Alternative 2) – Higher percentage of affordable homes. This is not the preferred approach because a higher percentage would impact on the viability and deliverability of sites.

G.74 Alternative option (Alternative 3) – Lower percentage of affordable homes. This is not the preferred approach because local authorities should continue to seek as much affordable housing delivery as viability allows.

G.75 Alternative option (Alternative 4) – Continue adopted Cambridge Local Plan approach of seeking 25% affordable homes on sites of 10-14 dwellings and 40% affordable homes on sites of 15 dwellings or more. This is not the preferred approach because local authorities should continue to seek as much affordable housing delivery as viability allows and the Greater Cambridge Local Plan Strategic Spatial Options Viability Assessment (Aspinall Verdi, November 2020) indicates that

securing 40% affordable homes on major developments is deliverable across Greater Cambridge.

Table G.6: Reasonable alternatives considered for H/AH: Affordable housing

SA Objective	2	3	4
1. Housing	++?	+	++
2. Access to services and facilities	0	0	0
3. Social inclusion and equalities	++?	+/-	++
4. Health	0	0	0
5. Biodiversity and geodiversity	0	0	0
6. Landscape and townscape	0	0	0
7. Historic environment	0	0	0
8. Efficient use of land	0	0	0
9. Minerals	0	0	0
10. Water	0	0	0
11. Adaptation to climate change	0	0	0
12. Climate change mitigation	0	0	0
13. Air quality	0	0	0
14. Economy	0	0	0
15. Employment	0	0	0

Alternative option (Alternative 2) Higher percentage of affordable homes

1.11 Although Alternative 2 would ensure the delivery of affordable homes in the area to meet the needs of mixed communities, resulting in significant positive effects against SA objectives 1: Housing and 3: Social inclusion and equalities, there is potential for a higher percentage of affordable homes to affect the viability and delivery of sites. As such, these effects are uncertain.

Alternative option (Alternative 3) Lower percentage of affordable homes

1.12 This is not the preferred approach because the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study recommends that local authorities should seek as much affordable housing delivery as viability allows. The requirement for a lower percentage of affordable homes would reduce the benefits provided by the provision of affordable homes in new residential developments compared to

Option A, resulting in minor positive effects against SA objectives 1: Housing and 3: Social inclusion and equalities. However, Alternative 3 may not result in the provision of affordable housing to meet local needs and, therefore, the effects expected against SA objective 3 are mixed minor positive and minor negative.

Alternative option (Alternative 4) Continue adopted Cambridge Local Plan approach of seeking 25% affordable homes on sites of 10-14 dwellings and 40% affordable homes on sites of 15 dwellings or more.

1.13 Alternative 4 is likely to result in a reduced number of affordable homes being provided in the area, reducing the benefits provided by the provision of affordable homes in new residential developments. This option requires a lower percentage of affordable homes on sites of 10-14 dwellings, but the same percentage as the draft policy for sites of 15 dwellings or more and would therefore reflect the effects of the draft policy quite closely. This option would provide greater certainty for the delivery and viability of affordable housing within residential developments of this size. As a result, significant positive effects are expected against SA objectives 1: Housing and 3: Social inclusion and equalities.

Policy H/ES: Exception sites for affordable housing

G.76 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because it would restrict the planning authority's ability to deliver additional affordable housing where it is needed the most.

G.77 Alternative option (Alternative 2) – Apply a more restrictive approach to rural exception sites. This option has not been appraised as it was not considered to be a reasonable alternative because previous policies have been successful in bringing forward sites.

G.78 Alternative option (Alternative 3) – Apply a more laissez-faire approach to the development of exception sites. This is not the preferred approach because it could lead to inappropriate sites coming forward, housing mixes being driven more by commercial gain than local need and rural exception sites being excluded by First Homes exception sites.

Table G.7: Reasonable alternative considered for Policy H/ES: Exception sites for affordable housing

SA Objective	3
1. Housing	++
2. Access to services and facilities	-?
3. Social inclusion and equalities	+/-
4. Health	-?
5. Biodiversity and geodiversity	0
6. Landscape and townscape	0
7. Historic environment	0
8. Efficient use of land	-?
9. Minerals	0
10. Water	0
11. Adaptation to climate change	-?
12. Climate change mitigation	-?
13. Air quality	-?
14. Economy	0
15. Employment	0

Alternative option (Alternative 3) Apply a more laissez-faire approach to the development of exception sites

G.79 The alternative option to apply a more laissez-faire approach to the development of exception sites and therefore implement fewer restrictions is likely to result in the development of more dwellings. Therefore, significant positive effects are expected in relation to SA objectives 1: Housing. However, this option could perform less favourably in terms of supporting the delivery of affordable homes and housing affordability given that it is likely to result in market homes being delivered on exception sites. As such mixed minor positive and minor negative effects are expected for SA objective 3: Social inclusion and equalities.

G.80 Furthermore, this option is also likely to result in an increased loss of greenfield land in countryside locations and the potential for more homes with poor access to services and facilities in the area, leading to an increase in the use of private vehicles. Therefore, uncertain minor negative effects are expected against SA objectives 2: Access to services and facilities, 4: Health, 8: Efficient use of land, 12: Climate change mitigation and 13: Air quality. Furthermore, development on

greenfield land could have adverse impacts in relation to flood risk and other factors relating to climate change resilience. Therefore, uncertain minor negative effects are also recorded in relation to SA objective 11: Adaptation to climate change.

Policy H/HM: Housing mix

G.81 Alternative option (Alternative 1) – Not including a policy setting out a housing mix for new developments and instead relying on the housing market to determine the housing mix. This option has not been appraised as it was not considered to be a reasonable alternative because the National Planning Policy Framework requires that the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies. Without a policy, the housing market and local circumstances determine the housing mix and there is a risk that the housing mix provided on new developments would not meet the needs of the area.

G.82 Alternative option (Alternative 2) – Apply housing mix policy to all developments, including small sites. This option has not been appraised as it is not considered to be a reasonable alternative. This is because it is not practical to apply the housing mixes suggested to sites of less than 10 dwellings, and for smaller sites it is important to make best use of the land and to take account of local circumstances

G.83 Alternative option (Alternative 3) – Not including a policy setting out a housing mix for affordable dwellings, and therefore relying on local circumstances to determine the housing mix. This option has not been appraised as it is not considered to be a reasonable alternative. This is because without guidance in the Local Plan there is a risk that the affordable housing mix provided on new developments would not meet the needs of the area.

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

G.84 Alternative option (Alternative 1) – No policy. This is not the preferred approach as it would not provide clear guidance on the approach that would be taken to development on garden land and subdivision of existing plots, leading to inconsistent outcomes. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

Policy H/SS: Residential space standards and accessible homes

G.85 Alternative option (Alternative 1) – Not implementing nationally described space standards. This is not the preferred approach because evidence shows that developments would provide new homes below these standards.

G.86 Alternative option (Alternative 2) – Not requiring new homes to meet the Building Regulations M4(2) standard. This is not the preferred approach because the Housing Needs of Specific Groups – Addendum for Greater Cambridge (2021) provides recommendations on the percentage of new homes that should meet this standard based on evidence of need. Furthermore, accessible and adaptable housing enables people to live more independently.

G.87 Alternative option (Alternative 3) – Not requiring new homes to meet Building Regulations M4(3) standard. This is not the preferred approach because there is evidence of a need for wheelchair user homes.

G.88 Alternative option (Alternative 4) – Not providing guidance on the delivery of private amenity space for all new homes. This is not the preferred approach because national planning policy states that planning policies should ensure that developments create places with a high standard of amenity for existing and future users.

Table G.8: Reasonable alternatives considered for Policy H/SS: Residential space standards and accessible homes

SA Objective	1	2	3	4
1. Housing	+	-	-	++
2. Access to services and facilities	0	0	0	0
3. Social inclusion and equalities	++	--	--	++
4. Health	-	++	++	-
5. Biodiversity and geodiversity	0	0	0	0
6. Landscape and townscape	0	0	0	0
7. Historic environment	0	0	0	0

SA Objective	1	2	3	4
8. Efficient use of land	0	0	0	0
9. Minerals	0	0	0	0
10. Water	0	0	0	0
11. Adaptation to climate change	0	0	0	0
12. Climate change mitigation	0	0	0	0
13. Air quality	0	0	0	0
14. Economy	0	0	0	0
15. Employment	0	0	0	0

Alternative option (Alternative 1) Not implementing nationally described space standards

G.89 This option is not the preferred approach because without a specific requirement for residential space standards, some developments may be designed below acceptable standards, which can have adverse effects on people's mental wellbeing. Therefore, this option has the potential to result in minor negative effects against SA objective 4: Health.

G.90 Significant positive effects are expected in relation to SA objective 3: Social inclusion and equalities because there is a requirement for all new homes to be accessible and adaptable, in line with the Building Regulations M4(2). There is also a requirement for 5% of affordable homes on new developments that include 20 or more affordable homes to specifically be designed for wheelchair users. This will ensure that new homes meet the specialist needs of those who are physically less able, including older and disabled people. Minor positive effects are expected against SA objective 1: Housing because the policy supports the development of accessible and adaptable dwellings so as to ensure different people's housing needs are met.

Alternative option (Alternative 2) Not requiring new homes to meet the Building Regulations M4(2) standard

G.91 This option is not the preferred approach because without a specific requirement for new homes and residential annexes to meet the Building Regulations M4(2) standard, people's specialist housing needs are less likely to be met. This

would exclude certain groups of people from finding a house suitable to their needs and therefore significant negative effects are expected against SA objective 3: Social inclusion and equalities. In addition, the Cambridgeshire and West Suffolk Housing Needs of Specific Groups – Addendum for Greater Cambridge (2021) provides recommendations on the percentage of new homes that should meet this standard based on evidence of need. This option is therefore expected to have minor negative effects against SA objective 1: Housing.

G.92 This option requires all new homes to meet the nationally described residential space standard, which will ensure that residents have a decent amount of space to live in. This will have beneficial effects on their mental health and wellbeing, with significant positive effects expected against SA objective 4: Health.

Alternative option (Alternative 3) Not requiring new homes to meet the Building Regulations M4(3) standard

G.93 This option is not the preferred approach because without a specific requirement for new homes and residential annexes to meet the Building Regulations M4(3) standard, it is less likely that 'wheelchair user' dwellings would be delivered in the plan area. However, evidence supporting the plan points to a need for wheelchair user homes. Therefore, significant negative effects are expected against SA objective 3: Social inclusion and equalities and minor negative effects expected against SA objective 1: Housing.

G.94 This option requires all new homes to meet the nationally described residential space standard, which will ensure that residents have a decent amount of space to live in. This will have beneficial effects on their mental health and wellbeing, with significant positive effects expected against SA objective 4: Health.

Alternative option (Alternative 4) Not providing guidance on the provision of private amenity space for all new homes

G.95 This option is not the preferred approach because without a specific requirement for private amenity space, some developments may be designed to provide new homes with low standards of private amenity space for existing and future users. The COVID-19 pandemic highlighted the importance of access to private amenity space; not providing any or a very limited amount of private amenity space can have adverse effects on people's mental wellbeing and therefore minor negative effects are expected against SA objective 4: Health.

G.96 This option sets out the internal space standards for new homes and the proportion of accessible and adaptable dwellings to be provided as part of the

dwelling mix so as to ensure different people's housing needs are met. Therefore, significant positive effects are expected in relation to SA objective 1: Housing. This option requires all new homes to be accessible and adaptable, in line with the Building Regulations M4(2). There is also a requirement for 5% of affordable homes on new developments that include 20 or more affordable homes to be wheelchair user friendly, in accordance with the Building Regulations M4(3)(a). This will ensure that new homes meet the specialist needs of those with protected characteristics, including older and disabled people. Therefore, significant positive effects are also expected in relation to SA objective 3: Social inclusion and equalities.

Policy H/SH: Specialist housing

G.97 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because it is considered that a criteria-based policy is needed as the considerations for specialist housing are different to other types of housing development.

G.98 Alternative option (Alternative 2) – Not to allocate sites for new specialist housing at new settlements and within urban extensions. This option has not been appraised as it was not considered to be a reasonable alternative because Councils need to set out how they will deliver sufficient specialist housing to meet the identified need, and these new developments should seek to deliver balanced and mixed communities. In addition, national planning policy requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

Policy H/CB: Self and custom-build homes

G.99 Alternative option (Alternative 1) – Allow the development of custom and self-build housing generally as an exception to policy. This is not the preferred approach because it is likely to restrict the delivery of rural exception sites for affordable housing.

G.100 Alternative option (Alternative 2) – No policy. This option was not appraised as it was not considered to be a reasonable alternative because Local planning authorities are required to have regard to need for self and custom build by Self Build and Custom Housebuilding Act 2015 and therefore must permit sufficient plots to meet local demand. The provision of sufficient plots is unlikely without a policy.

Table G.9: Reasonable alternative considered for Policy H/CB: Self and custom-build homes

SA Objective	1
1. Housing	+
2. Access to services and facilities	0
3. Social inclusion and equalities	0
4. Health	0
5. Biodiversity and geodiversity	0
6. Landscape and townscape	-?
7. Historic environment	0
8. Efficient use of land	0
9. Minerals	0
10. Water	0
11. Adaptation to climate change	0
12. Climate change mitigation	0
13. Air quality	0
14. Economy	0
15. Employment	0

Alternative option (Alternative 1) Allow the development of custom and self-build housing generally as an exception to policy

1.14 Alternative 1 to allow for the development of custom and self-build housing generally as an exception to policy is likely to limit the delivery of rural exception sites for affordable housing due to unrestricted custom and self-build housing that may occupy sites which would otherwise be reserved as exception sites for affordable housing. However, Alternative 1 would still allow for the development of custom and self-build housing which will support local housing need, resulting in minor positive effects against SA objective 1: Housing.

1.15 Individuals wishing to acquire a new home via self/custom build rather than buying it from a traditional housebuilder are likely to be motivated by a desire to have greater influence on the design and layout, and to have the ability to create a home to suit their individual needs and aspirations. In seeking to provide the flexibility for this to happen there is a risk that this policy, which facilitates provision of new homes via self-custom build, could result in inappropriate development design (e.g. inconsistent with surrounding landscape and townscape) with potential minor negative effects in relation to SA objective 6: Landscape and townscape. However, these effects are uncertain as they will depend on housing design.

Policy H/BR: Build to Rent Homes

G.101 Alternative option (Alternative 1) – No policy. This option was not appraised as it was not considered to be a reasonable alternative because national planning policy requires the housing needs of different groups, including those who wish to rent their homes, to be reflected in planning policies.

G.102 Alternative option (Alternative 2) – Include a policy with a presumption against Build to Rent development. This is not the preferred approach because national planning policy requires the housing needs of different groups, including those who rent their homes, to be reflected in planning policies and there is evidence of local need for this housing type.

Table G.10: Reasonable alternatives considered for Policy H/BR: Build to Rent Homes

SA Objective	2
1. Housing	-
2. Access to services and facilities	0
3. Social inclusion and equalities	-
4. Health	0
5. Biodiversity and geodiversity	0
6. Landscape and townscape	0
7. Historic environment	0
8. Efficient use of land	0

SA Objective	2
9. Minerals	0
10. Water	0
11. Adaptation to climate change	0
12. Climate change mitigation	0
13. Air quality	0
14. Economy	0
15. Employment	0

Alternative option (Alternative 2) Include a policy with a presumption against Build to Rent developments

G.103 Alternative 2 to include a policy with a presumption against Build-to-Rent developments is unlikely to ensure that the provision of such housing is sufficient to meet local demand. As there is evidence of local need for this type of housing, the Local Plan will need to specify how proposals for this type of development will be considered. As such, minor negative effects are expected against SA objectives 1: Housing and 3: Social inclusion and equalities. In addition, national planning policy requires the housing needs of different groups, including people that rent their homes, to be reflected in planning policies.

Policy H/CL: Co-living

G.104 Alternative option (Alternative 1)– No policy. This option has not been appraised as it was not considered to be a reasonable alternative because the National Planning Policy Framework requires the size, type and tenure of homes needed for different groups in the community, including those who rent their homes, to be assessed and that the results of that assessment be reflected in planning policies.

Policy H/MO: Houses in Multiple Occupation (HMOs)

G.105 Alternative option (Alternative 1) – No policy. This is not the preferred approach because it is considered that a criteria based policy is needed as the considerations for HMOs are different to other types of development and therefore it

is necessary to safeguard local amenity. A no policy approach would result in national policy alone being applicable. This approach has not been appraised in the SA given that it is not the role of this SA to appraise national policy.

G.106 Alternative option (Alternative 2) – Include a policy with a presumption against further HMOs. This is not the preferred approach because it would not allow for sufficient flexibility in the housing market to deliver the housing needed for different groups.

G.107 Alternative option (Alternative 3) – Not requiring HMOs to meet space and amenity standards. This is not the preferred approach because national planning policy states that planning policies should ensure that developments create places with a high standard of amenity for existing and future users. Furthermore, the requirements for HMO licences include for internal space standards to be met.

Table G.11: Reasonable alternatives considered for Policy H/MO: Houses in multiple occupation

SA Objective	2	3
1. Housing	-	+
2. Access to services and facilities	0	0
3. Social inclusion and equalities	-	+
4. Health	0	-
5. Biodiversity and geodiversity	0	0
6. Landscape and townscape	0	0
7. Historic environment	0	0
8. Efficient use of land	0	0
9. Minerals	0	0
10. Water	0	0
11. Adaptation to climate change	0	0
12. Climate change mitigation	0	0
13. Air quality	0	0

SA Objective	2	3
14. Economy	0	0
15. Employment	0	0

Alternative option (Alternative 2) Include a policy with a presumption against further HMOs

1.16 Alternative 2 to include a policy with a presumption against further HMOs would not provide sufficient flexibility to reflect site specific circumstances and may restrict the development of such housing types where it is needed most. This option is also unlikely to ensure that the provision of such housing is sufficient to meet local demand. As HMOs form an important part of the housing market in Cambridge, the Local Plan will need to specify how proposals for this type of development will be considered. As such, minor negative effects are expected against SA objectives 1: Housing and 3: Social inclusion and equalities.

Alternative option (Alternative 3) Not requiring HMOs to meet space and amenity standards

1.17 Alternative 3 to include a policy that does not require HMOs to meet space and amenity standards has the potential to result in minor negative effects against SA objective 4: Health because without a specific requirement for residential space and amenity standards, some developments of this type may be designed to provide new homes with low standards of residential space and amenity for existing and future residents. The need for sufficient residential space and amenity standards was emphasised during the coronavirus pandemic, and the lack of which may result in negative impacts on mental health and wellbeing.

G.108 As Alternative 3 would still contribute to the delivery of HMOs, just not adhere to space and amenity standards. It is therefore likely to contribute towards meeting local housing demand and will support the housing needs of specific groups of people such as students, resulting in minor positive effects against SA objectives 1: Housing and 3: Social inclusion and equalities. Given that this option would only alter the draft policy by not setting out space and amenity standards, the minor positive effects identified in relation to SA objectives 12: Climate change mitigation and 13: Air quality also remain applicable.

Policy H/SA: Student accommodation

G.109 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because national planning policy requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

G.110 Alternative option (Alternative 2) – Include a policy with a presumption against further student accommodation. This option has not been appraised as it was not considered to be a reasonable alternative because national planning policy requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, and students make up a significant proportion of the population of Cambridge.

Policy H/DC: Dwellings in the countryside

G.111 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because it would lead to uncertainty as to how development proposals would be considered and determined. In addition, national planning policy requires local development plans to address rural housing issues.

Policy H/RM: Residential moorings

G.112 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because it is considered that a criteria based policy is required to maintain the quality of the river environment and safeguard local amenity, as the considerations for residential moorings are different to other types of development. In addition, national planning policy requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

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

G.113 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because national planning policy requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

Policy I/ST: Sustainable Transport and Connectivity

G.114 Alternative option (Alternative 1) – No policy. This option has not been appraised as it is not considered to be a reasonable alternative because relying on the Local Transport Plan or national policy would not provide sufficient detail to address the local context and ensure that sustainable transport is fully considered through the planning application process.

Policy I/TH: Travel hub facilities

G.115 Alternative option (Alternative 1) – No policy. This option has not been appraised as it was not considered to be a reasonable alternative because it is not aligned with the Transport Strategy for the plan area. This option would also not provide the same level of protection for existing park and ride sites.

Policy I/EV: Parking and Electric Vehicles

G.116 Alternative option (Alternative 1) – No policy. This option has not been appraised as it is not considered to be a reasonable alternative because national planning policy requires consideration of parking.

G.117 Alternative option (Alternative 2) – Set specific standards for car parking provision. This is not the preferred approach as the flexibility provided by a design-led approach to car parking is favoured.

G.118 Alternative option (Alternative 3) – Do not set any requirements for vehicle charging (noting that the policy requirement does not set vehicle charging requirements for individual developments as this is covered by Building Regulations). This is not the preferred approach given the need for developments to respond to climate change, and to adapt to changing vehicle types.

Policy I/SD: Servicing and last-mile deliveries

G.119 Alternative option (Alternative 1) – No policy. This is not the preferred approach due to the need to address the issue of how goods are distributed locally.

Policy I/Sl: Safeguarding important infrastructure

G.120 Alternative option (Alternative 1) – No policy. This option was not assessed as it is not considered to be a reasonable alternative because it would risk jeopardising important infrastructure.

Policy I/AD: Aviation Development

G.121 Alternative option (Alternative 1) – No policy. This has not been assessed as it is not considered to be a reasonable alternative because there is a need to provide policy guidance to ensure impacts of proposals, and air safety, are fully considered.

Policy I/EI: Energy Infrastructure Masterplanning

G.122 Alternative option (Alternative 1) – No policy. This is not the preferred approach as energy infrastructure availability has become an important issue in Greater Cambridge particularly with the growing emphasis on renewable energy. It is important this addressed in a planned way by major developments rather than on an ad-hoc basis.

Policy I/ID: Infrastructure and Delivery

G.123 Alternative option (Alternative 1) – No policy. This option has not been assessed as it is not considered to be a reasonable alternative. This is because it would not provide sufficient clarity regarding the requirement of developers to mitigate the impacts of their developments, what infrastructure was needed and when, and how it would be secured.

Policy I/DI: Digital and telecommunications infrastructure

G.124 Alternative option (Alternative 1) – No policy. This option has not been appraised in the SA given that it would not result in any sustainability effects over and above the expected baseline position without the plan.

G.125 Alternative option (Alternative 2) – Continuing the current policy approach by just requiring ducting rather than for actual connections. This is not the preferred approach as this is insufficient to ensure infrastructure is delivered to support development.

Policy I/CM: Construction management

G.126 Alternative approach (Alternative 1) – No policy and rely on national policy and the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021. This was not considered a reasonable alternative as the NPPF and the Cambridgeshire and Peterborough Minerals and Waste Local Plan do not explicitly address various issues related to construction management or construction waste, such as soil management or temporary haulage roads.

SA recommendations made at First Proposals on the proposed policy approaches

G.127 The SA for the First Proposals Local Plan set out a number of recommendations for the Councils to consider while preparing the Draft Local Plan, in order to minimise negative sustainability effects and maximise positive sustainability effects. The recommendations were as follows, and below each recommendation is an explanation from the Councils about how they have been addressed in the Draft Local Plan (Regulation 18):

- Vision – it is recommended that the vision includes reference to adaptation to the impacts of climate change, as well as mitigation.
 - The Vision now does include reference to adapting to the impacts of climate change, alongside mitigation.
- Policy S/NEC: North East Cambridge could explicitly identify opportunities at the site to address flood risk, such as through the inclusion of SuDS.
 - The North East Cambridge policy explicitly requires the integration of SUDS and flood mitigation measures in the design of landscapes and open spaces.
- Policy S/AMC: Areas of Major Change and Policy S/OA: Opportunity areas in Cambridge – it is recommended that these policies include stronger Green Infrastructure aspirations in relation to public realm improvements.
 - Opportunity areas in Cambridge have been proposed to be renamed to Public Realm Improvement Areas (PRIA). Green infrastructure requirements are addressed in other policies within the plan.
- Policy S/GC: Genome Campus – The policy could be improved by including commitments to delivering sustainable transport links at this location.
 - The movement section of this policy includes a range of sustainable transport requirements, including in particular delivery of direct and rapid

transit connectivity interventions to assist improved connectivity with the Campus to Whittlesford Parkway Station and the South Eastern Travel Hub.

- Policy BG/BG: Biodiversity and geodiversity – It is recommended that this policy includes reference to the mitigation hierarchy, in that adverse effects on biodiversity and geodiversity should be avoided if possible, if not then reduced, then any residual effects mitigated, with compensation only being used as a last resort.
 - The biodiversity and geodiversity policy now does include reference to mitigation hierarchy in reference to development proposals.
- Policy BG/GI: Green infrastructure – it is recommended that this policy is renamed to ‘green and blue infrastructure’ in order to be clear that blue infrastructure is also included. The policy could more clearly identify which initiatives support the Wicken Fen Vision Area.
 - The policy name has been changed as recommended. Given the high level nature of the policy content it is considered too much detail to highlight explicitly which initiatives support the Wicken Fen Vision Area.
- Policy BG/TC: Improving tree canopy cover and the tree population – It is recommended that this policy refers to the need to ensure new planting is resilient to climate change. For example, when referring to ‘locally appropriate species’, it is recommended ‘taking into account climate change’ is added.
 - The policy now includes a focus on climate change resilient species as well as locally appropriate species.
- Policy BG/PO: Protection of open spaces - This policy could potentially be combined with BG/EO: Enhancing open. It is recommended that the policy could require all new developments to include some form of open space, be it public or private open space. The policy could also set out in what circumstances the total or partial loss of designated open spaces would (or would not) be permitted, in addition to a requirement for all open spaces to be inclusive and easily accessible to all. Lastly, SuDS could be incorporated into open spaces to help in sustainable water management and mitigating flood risk.
- Policy BG/EO: Enhancing open spaces - This policy could potentially be combined with BG/PO: Protection of open spaces. The policy could set out in what circumstances the total or partial loss of designated open spaces would (or would not) be permitted. Reference could also be added to SuDS and their incorporation into open spaces. The policy could also include wording on protecting the safety of users of the open spaces, particularly at night. Lastly, the policy currently states that provision will be onsite where appropriate. If not, financial contributions will be sought to improve off-site facilities. The policy

should clarify what is meant by off-site facilities and whether this refers to improvements to existing open spaces and facilities in general.

- Policy BG/PO Protection of open spaces and Policy BG/EO: Enhancing open spaces have been retained as separate policies to maintain a clear and simple policy framework, noting the complexity of Policy BG/EO in particular.
- Policy BG/EO does not state explicitly that all new developments should include some form of open space, but the importance of protecting open space is clear. Policy BG/EO however does state that “New development must address the open space needs it generates”. It also requires open space to meet best practice design principles which would include protecting the safety of users in open spaces. Policy BG/GI requires that green infrastructure – which open space forms a part of – is designed to be multifunctional, resilient, and environmentally sensitive, which would include provision of sustainable drainage systems. Policy CC/IW: Integrated Water Management, Sustainable Drainage and Water Quality requires provision of sustainable drainage systems. Policy BG/EO clarifies what is meant by off-site facilities and that this refers to both providing new spaces as well as enhancing and maintaining existing spaces.
- A separate policy is deemed appropriate for Policy BG/PO given that it sets out in what circumstances the total or partial loss of designated open spaces would be permitted and requirements for replacement open spaces.
- Policy WS/HD: Creating healthy new development - This policy could potentially be divided into several policies, as it is currently lacking in detail. Many of the topics mentioned are covered within other policies, therefore it is recommended that the policy cross-references other relevant policies.
 - The policy now includes substantial detail, and cross-references to where other policies in the plan address the policy.
- Policy WS/HS: Pollution, health and safety – This policy could provide more detail by specifying receptors to environmental pollution as a result of new and existing development. These may include local residents, visitors, wildlife and habitats.
 - The policy refers to some specific receptors in places, but seeks not to be overly specific so as to be applicable to differing contexts. Policy BG/BG addresses the impacts of development on wildlife and habitats.
- Policy H/AH: Affordable housing – It is recommended that this policy requires affordable housing to not be distinguishable in appearance from market housing. This will help promote social inclusion and equalities.

- This policy now specifies that all affordable housing will be tenure blind in design, so it is indistinguishable from market housing.
- Policy H/ES: Exception sites for affordable housing - It is recommended that this policy provides further detail on the meaning of appropriate locations for exception sites, such as the proximity to services and facilities that would enable good access.
 - The policy sets out detailed requirements for exception sites proposals, including specifying that the location and scale of development needs to be appropriate to the size, facilities and character of the settlement.
- Policy H/SH: Specialist housing - This policy could provide clarification in relation to what is considered an 'accessible' location, such as one that is in close proximity to services and facilities.
 - The policy now specifies that specialist housing will only be permitted in locations that are accessible to local shops, public transport and community facilities and services.
- Policy H/RC: Residential Caravan sites - This policy could recommend that residential caravan sites and mobile home parks with static dwellings over a certain size provide an element of affordable housing and communal, outdoor amenity space, or a minimum plot size to enable provision of some private, outdoor amenity space.
 - The Draft Local Plan does not include a specific policy for residential caravans. Residential caravan parks have a role in contributing to a range of different housing options for people. However, they are a very small part of the housing mix and there is no evidence of a need for more. The considerations for residential caravans and park homes are not significantly different to other residential developments and it is therefore considered practical to assess them against the same criteria as other proposals for residential development. However, each proposal will need to be assessed on its own merits against these criteria.
- Policy I/ST: Sustainable transport and connectivity – It is recommended that, either here or in a separate policy, the Local Plan sets out design requirements or guidance for provision of cycle infrastructure that is attractive and safe, including being separated from both pedestrians and road traffic and ensuring cyclists are not hampered by parked cars.
 - This policy specifies that new road or new road access within or leading into the site is designed to give priority to pedestrians and cyclists over vehicular traffic, for their safety. Although specific guidelines are not given there, is a

clear priority given to protecting existing and developing new sustainable transport infrastructure.

- Policy I/ID: Infrastructure delivery – It is recommended that this policy is clear about the infrastructure covered by the policy. This should include physical, social and green and blue infrastructure.
 - The policy provides a list of what is included under the term infrastructure. Green and blue infrastructure is not explicitly included but parks, open spaces, and biodiversity are included.

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