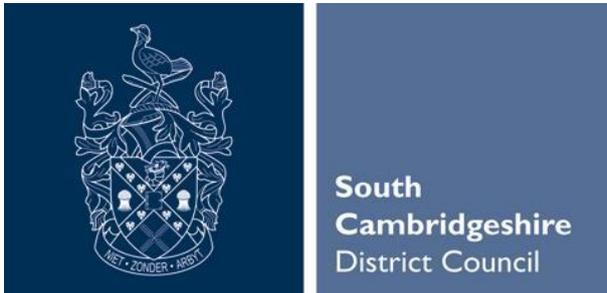


**SC3/SCDC**



Examination into the Soundness of the  
South Cambridgeshire Local Plan

**Matter SC3 – Delivering High Quality Places**

South Cambridgeshire District Council

November 2016



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Matter SC3: Delivering High Quality Places  
Statement by South Cambridgeshire District Council  
November 2016

## Introduction

1. This statement sets out the Council's response in relation to the Inspectors' Matter SC3 relating to delivering high quality places.
2. All the documents referred to in this statement are listed in Appendix 1, and examination library document reference numbers are used throughout the statement for convenience.
3. As a result of considering the Inspectors' questions, the Council is suggesting some modifications to policies in Chapter 5: Delivering High Quality Places of the South Cambridgeshire Local Plan<sup>1</sup>. These modifications are referred to in the responses to each question, and are also all listed in Appendix 2 for convenience. They should be read alongside proposed modifications to the Local Plan outlined in the Schedule of Proposed Minor Changes following Proposed Submission Consultation, submitted alongside the Local Plan in March 2014.<sup>2</sup>

## **SC3A – Policy HQ/1: Design Principles**

### **SC3A.i**

#### **Should criterion (d) also make reference to density?**

4. No, it is unnecessary and not appropriate for Policy HQ/1 to refer to density.
5. Policy HQ/1 advocates a design-led approach to development, and includes a number of criteria setting out the design principles which need to be considered by developers to achieve a high quality design.
6. The Council considers it is important that the design process is iterative and should involve development taking cues from its context, surroundings and local distinctiveness. By taking into account the 'cues' (including factors such as scale, mass, form, siting etc. listed in criterion d) from the area surrounding the proposed development these should, if addressed properly, influence the density proposed within the new development. This, together with the other criteria in Policy HQ/1, provide a sound basis for achieving good design for all new developments. Density is a product of a truly design-led approach. The supporting text to Policy HQ/1 states: "A fully responsive and design-led approach to development is needed rather than design being approached as a simple checklist or as an optional extra" (paragraph 5.6). To include reference to density within Policy HQ/1 would refocus the developers' 'starting point'; rather than approaching the site as a blank canvas and undertaking a truly design-led response (as set out in the District Design Guide SPD<sup>3</sup>), developers would be consciously seeking to deliver development to a certain density and making it 'fit' the site.

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<sup>1</sup> Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)

<sup>2</sup> Schedule of Proposed Minor Changes following Proposed Submission Consultation (March 2014) (RD/Sub/SC/040).

<sup>3</sup> Part III Procedures and Applications, pages 229-243, District Design Guide Supplementary Planning Document (RD/SPD/080).

7. In addition paragraph 58 of the National Planning Policy Framework (NPPF)<sup>4</sup> refers to “optimising the potential of sites to accommodate development, create and sustain an appropriate mix of uses”. If this is approached from a density perspective it could result in developers seeking to include a specific density simply to achieve a prescribed number of units, rather than undertaking a truly design-led approach, appreciating what the site really can accommodate alongside the appropriate mix of other uses, such as open space, as advocated in the NPPF. Policies SS/5 and SS/6 for the new settlements north of Waterbeach and at Bourn Airfield, as proposed to be modified (November 2016), state that the final number of dwellings will be determined through a design-led approach. Policy H/1 Allocations for Residential Development at Villages also states that the number of homes on a site should be determined through a design-led approach. The Council therefore considers that it is not appropriate to include reference to density within Policy HQ/1.
8. It should also be noted that Policy HQ/1 is applicable to all development, not just residential uses. Residential density is already addressed in Policy H/7: Housing Density<sup>5</sup> and there is no need to repeat it. Whilst Policy H/7 advocates an average net density of 30 dwellings per hectare (dph) in villages (excluding infill villages) and 40 dph in urban extensions to Cambridge and new settlements it caveats this in paragraph 2, which states that the net density may vary where justified by the character of the locality, scale of development or other local circumstances. This means that developers should undertake a design-led approach. As residential density is already adequately addressed in Policy H/7 there is no need, therefore, to include density within Policy HQ/1.
9. Further guidance on the application of residential density (in the equivalent adopted LDF Policy<sup>6</sup>) is provided in the District Design Guide SPD, which states that “density is a product of the design and should not be used as a determining factor in the design approach adopted” (paragraph 6.37)<sup>7</sup>. The Local Plan acknowledges in paragraph 5.9 of the supporting text that the District Design Guide SPD will be updated once the Local Plan is adopted. This will provide the opportunity to provide additional guidance on the application of Policy HQ/1.
10. Notwithstanding the approach the Council has taken, it is noted that the NPPF includes reference to density in the context of design policies.<sup>8</sup> Therefore if the Inspectors consider it is necessary for soundness to include reference to density in criterion the Council would propose the following:

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<sup>4</sup> National Planning Policy Framework (NPPF) (RD/NP/010)

<sup>5</sup> Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010) page 138.

<sup>6</sup> Policy DP/2: Design of New Development, page 10, South Cambridgeshire District Council Development Control Policies Development Plan Document (RD/AD/110).

<sup>7</sup> District Design Guide Supplementary Planning Document (RD/SPD/080)

<sup>8</sup> Paragraph 59, National Planning Policy Framework (NPPF) (RD/NP/010)

Amend criterion 1d of Policy HQ/1 to read:

‘Be compatible with its location and appropriate in terms of scale, **density**, mass, form, siting, design, proportion, materials, texture and colour in relation to the surrounding area;’

### SC3A.ii

#### Should criterion (f) also refer to the provision of safe opportunities for horse riding?

11. Yes it is appropriate for criterion f of Policy HQ/1 to refer to horse riding as they have specific needs, different to other users.
12. Whilst criterion f is intended to achieve permeable development with ease of movement and access for all users and abilities, this relates to enabling people to go about their daily activities such as journeys to work or school, shops or other venues.
13. Horse riding is a leisure activity rather than a means of travel but is nevertheless important and should be accommodated into new development where appropriate. Cambourne provides a good example of how horse riding can be integrated into new development, having provided an extensive network of new bridleways which link into the wider rights of way network.
14. The Council acknowledges the needs of horse riders can be quite specific and therefore recognition of this should be addressed in the policy. To address this issue the Council proposes a modification to criterion f of Policy HQ/1 as follows:

Amend Criterion 1f of Policy HQ/1 to read:

‘Achieve a permeable development with ease of movement and access for all users and abilities, with user friendly and conveniently accessible streets **and other routes** both within the development and linking with its surroundings and existing and proposed facilities and services, focusing on delivering attractive and safe opportunities for walking, cycling, and public transport **and, where appropriate, horse riding;**’

15. This modification supersedes modification MC/5/04 the Council submitted alongside the Submission Local Plan in March 2014.<sup>9</sup>

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<sup>9</sup> Schedule of Proposed Minor Changes following Proposed Submission Consultation (March 2014) (RD/Sub/SC/040).

**SC3A.iii**

**Should criterion (k) make specific reference to the Lifetime Homes and Lifetime Neighbourhoods criteria?**

16. No it is not appropriate for the policy to make reference to Lifetime Homes or Lifetime Neighbourhoods.

Lifetime Homes

17. Criterion k of Policy HQ/1 already seeks to ensure new development has flexibility to adapt to meet future changes in needs and lifestyles. This means designing houses to create accessible homes that will meet the differing and changing needs of households as they experience life events. This is in essence what Lifetimes Homes seek to deliver but the wording of criterion k as currently drafted is less likely to become out of date.
18. Policy HQ/1 is applicable to all development types, not just residential uses. The submitted Local Plan addressed the issue of Lifetime Homes in Policy H/8: Housing Mix<sup>10</sup>, which states that all affordable homes and 1 in every 20 market homes be built to meet the Lifetime Homes Standard.
19. However, since submitting the Local Plan in March 2014 the Government has issued a series of Written Ministerial Statements (WMS) and this is an issue the Inspectors asked the Council to address in their letter of May 2015. The WMS issued on 25 March 2015<sup>11</sup> states:
- “local planning authorities...preparing...Local Plans...should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”
20. The Council’s Hearings Statement SC5B Delivering High Quality Homes responds to the WMS in relation to the issue of Lifetime Homes in its response to question SC5B.2.iv.<sup>12</sup> (The relevant extract from the Hearings Statement is provided in Appendix 3).
21. Paragraph 24 of the Council’s Hearings Statement SC5B recognises that if access standard policies are to be included in Local Plans there must be evidence of need, of viability, and be limited to application of Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (Wheelchair user dwellings) standards only of the Building Regulations 2015. The accessible and adaptable dwellings standards are very similar to the previous Lifetime Homes standard, seeking to achieve similar levels of accessibility to and within properties. The Council addressed this issue in the

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<sup>10</sup> Paragraph 3 of Policy H/8: Housing Mix, page 139, Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010).

<sup>11</sup> Written Ministerial Statement (25 March 2015) (RD/Gov/200)

<sup>12</sup> Paragraphs 23-30 (pages 7-8) Council’s Hearings Statement SC5B Delivering High Quality Homes (September 2016).

Matter SC5B statement (see Appendix 3) and in response proposed a modification to replace paragraph 3 of Policy H/8: Housing Mix (which referred to Lifetime Homes) to require 5% of homes to be built to the accessible and adaptable dwellings M4(2) standard instead.<sup>13</sup> Consequential amendments have also been proposed to the supporting text of Policy H/8, removing all reference to Lifetime Homes.

22. Since the publication of the WMS it is no longer appropriate to refer to Lifetime Homes within Local Plan policies. Amended Policy H/8 addresses the issue of accessible and adaptable residential development. Policy HQ/1 is applicable to all development not just residential use. Criterion k requires all developments to be adaptable to meet future changes in needs and lifestyles. Therefore it is not necessary for Lifetime Homes or its successor to be introduced into Policy HQ/1.

#### Lifetime Neighbourhoods

23. The Department for Communities and Local Government published guidance on Lifetime Neighbourhoods in 2011.<sup>14</sup> Chapter 3 of the guidance explains what a Lifetime Neighbourhood is and what the principal components are. It states
- “...lifetime neighbourhoods have been conceptualised in various but often similar ways, and there are many parallels between lifetime neighbourhoods and ideas of sustainable communities. All neighbourhoods will be different in terms of demographic and socio-economic profile, as well as in terms of existing infrastructure, and ease of access to resources and facilities in other neighbourhoods and city centres. Some neighbourhoods could already be described as lifetime neighbourhoods, or already be well on the way to being a lifetime neighbourhood.”  
(Page 22)
24. The main components that make up Lifetime Neighbourhoods are illustrated in Figure 3.1 of the guidance.<sup>15</sup> These include supporting residents to develop lifetime neighbourhoods, empowerment, access, services and amenities, built and natural environments, social networks / well-being and housing.
25. Policy HQ/1 is already comprehensive, incorporating a number of criteria to address these components insofar as they relate to land use planning, such as access, services and amenities, built and natural environments, well being and housing. By implication developments which comply with Policy HQ/1 and achieve good design, as also advocated by the NPPF<sup>16</sup> and Planning Practice Guidance (NPPG)<sup>17</sup>, will improve the places (neighbourhoods) in which people live and help to create sustainable communities. As this is the essence of Lifetime Neighbourhoods, there is

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<sup>13</sup> Paragraph 28 (page 8) Council's Hearings Statement SC5B Delivering High Quality Homes (September 2016).

<sup>14</sup> Lifetime Neighbourhoods (Department for Communities and Local Government (December 2011) (RD/H/830)

<sup>15</sup> Figure 3.1: Lifetime Neighbourhoods: Key Components (page 24) Lifetime Neighbourhoods (Department for Communities and Local Government (December 2011) (RD/H/830)

<sup>16</sup> National Planning Practice Guidance (NPPG) (RD/NP/020)

<sup>17</sup> National Planning Practice Guidance (NPPG) (RD/NP/020)

no need to include direct reference to Lifetime Neighbourhoods within Policy HQ/1 and risk the Local Plan becoming dated, as with Lifetime Homes (as outlined above).

26. The wording in Policy HQ/1 already addresses the principles of both Lifetime Homes and Lifetime Neighbourhoods in an appropriate way. Therefore there is no need to include reference to either within Policy HQ/1.

#### **SC3A.iv**

**Would the intention of criterion (n) be better expressed if the words “which avoids” were replaced by “or development which would create”?**

27. The Council agrees that the wording of criterion n could be made clearer.
28. Criterion n is to ensure no unacceptable harmful impacts from development on the health and amenity of occupiers and surrounding uses. As well as the impacts that may arise from the physical structure (such as overlooking, overbearing or loss of daylight), criterion n recognises that the new land use / occupier of the site may generate additional impacts such as noise and odour, which could have adverse impacts. As currently drafted this dual aspect is not entirely clear.
29. The Council agrees that the suggested wording would make the policy intention clearer, and therefore proposes a modification as follows:

Amend criterion n of Policy HQ/1 to read:

- ‘n. Protect the health and amenity of occupiers and surrounding uses from development that is overlooking, overbearing or results in a loss of daylight, ~~which avoids~~ **or development which would create** unacceptable impacts such as noise, vibration, odour, emissions and dust;’

#### **SC3A.v**

**What is the proposed timescale for the review of the District Design Guide SPD as paragraph 5.9 indicates that this is intended to provide further guidance to Policy HQ/1?**

30. The District Design Guide SPD will be reviewed once the Local Plan is adopted.
31. There is currently no programmed timetable for the review of the District Design Guide SPD<sup>18</sup>; the timing will be dependent upon a number of factors, including the timescale for the adoption of the Local Plan and the Council’s priorities once the Local Plan is adopted and availability of resources.
32. However, as Policy HQ/1 is broadly compatible with adopted LDF Policy DP/2: Design of New Development<sup>19</sup>, much of the extant District Design Guide SPD will

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<sup>18</sup> District Design Guide Supplementary Planning Document (RD/SPD/080)

<sup>19</sup> Policy DP/2: Design of New Developments, page 10 South Cambridgeshire District Council Development Control Policies Development Plan Document (RD/AD/110).

remain valid to the interpretation of Policy HQ/1, and in the interim period it will remain a material planning consideration.

33. The Council nevertheless recognises there will be a need for some general updating to address changes since 2010 when the SPD was adopted, and also to reflect and add guidance in relation to changes proposed to other policies in the Local Plan in proposed modifications, such as in relation to Climate Change. Whilst updating the SPD the Council also intends to make the guidance more targeted and user-friendly.
34. The scope of the SPD is within the scope of Town and Country Planning (Local Plan) (England) Regulations 2012 regulation 5(1)(a)(iii). It will supplement the Council's Local Plan policies and address how they should be implemented, in order to achieve the environmental, social and economic objectives for the area.

### **SC3.B Policy HQ/2: Public Art and New Development**

#### **SC3B.i**

**Should paragraph 3 refer to the possibility of pooled contributions for public art (up to a maximum of five) to enable fewer but more significant items of public art to be achieved in a particular locality where appropriate?**

35. The policies in the Local Plan already allow for pooling of contributions it receives, including for public art. However this can only be done in the context of paragraph 123 of the Community Infrastructure Levy Regulations 2010 which govern the use of planning obligations insofar as pooling of contributions. It is considered that sufficient safeguards exist whereby it would be unlawful for a decision taker to approve a planning application that breaches this restriction. Furthermore CIL is currently the subject of a Government review and which includes this particular matter. It would therefore be inappropriate for the policy not to be responsive to Regulatory amendments. Moreover, Policy TI/8: Infrastructure and New Developments<sup>20</sup> addresses developer contributions, therefore it is not necessary to add such detail within Policy HQ/2.
36. Policy HQ/2 seeks to integrate, wherever possible, public art into the design of the new development. This should always be the starting point, to help raise the visual quality of developments and create a sense of place. It would ensure compliance with Policy HQ/1: Design Principles, by ensuring all elements of a site's design are considered collectively at the outset rather than as an 'add-on' at the end of the design process. On the basis that public art will be included within each development, no pooling will occur as each planning obligation will be unique to that development.
37. Paragraphs 5.10 and 5.11<sup>21</sup> of the supporting text explain that Policy HQ/2 can involve functional public art within the development (such as lighting, fencing, landscaping, fountains and water features) to help create a sense of place and does not necessarily have to be a bespoke piece of art (such as a sculpture). Functional public art is less likely to require additional land for its delivery than a bespoke piece of art, and can therefore be easily integrated into new development. As such, it is not often that the need for making contributions, let alone pooling contributions, arises.
38. Nevertheless the Public Art SPD which supplements adopted LDF Policy SF/6 provides further guidance on the application of the public art policy. The Public Art SPD outlines where a developer is willing to make a contribution but unable to achieve an appropriate scheme on site the Council will encourage financial contributions.<sup>22</sup> The Public Art SPD will be reviewed once the Local Plan is adopted and further guidance can be provided to address the issue of pooling contributions.

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<sup>20</sup> Policy TI/8: Infrastructure and New Developments, page 233, Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)

<sup>21</sup> Pages 102-103, Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010).

<sup>22</sup> Public Art Supplementary Planning Document (RD/SPD/050) paragraphs 3.6 - 3.7 (page 8).

39. The Council agrees that it would add clarity to be more explicit about financial contributions towards public art and pooling contributions, and proposes a modification to amend Policy HQ/2:

Add a new paragraph after paragraph 1 in Policy HQ/2 to read:

**'2. Where development is unable to achieve an appropriate scheme on site the Council will encourage developers to make a financial contribution to support public art initiatives. Financial contributions may be pooled, where appropriate.'**

#### SC3B.ii

**Paragraph 5.13 indicates that support for the policy will be provided in in a Public Art SPD. Is this a reference to the extant SPD which was adopted in 2009?**

40. No, the reference in paragraph 5.13 is to a new Public Art SPD.
41. Paragraph 5.13 states "Further guidance to support Policy HQ/2 will be provided in a Public Art SPD..." [emphasis added].
42. It is now the Council's intention that guidance on public art would be better incorporated into the District Design Guide SPD when it is reviewed. This reflects the close link with Policy HQ/1 in terms of seeking to integrate, where possible, public art into the design of new development and in terms of place making.
43. The scope of any SPD will be within the scope of Town and Country Planning (Local Plan) (England) Regulations 2012 regulation 5(1)(a)(iii). It will supplement how the Council's Local Plan policies should be implemented, and achievement of the environmental, social and economic objectives for the area.
44. To reflect this change, the Council proposes the following modification to paragraph 5.13:

Replace paragraph 5.13 with the following:

**Further guidance to support Policy HQ/2 will be provided in the District Design Guide SPD.**

## **Appendix 1: List of Reference Documents**

The Council's evidence in relation to SC3: Delivering High Quality Places is set out in the following documents:

### **National Policy:**

- National Planning Policy Framework (NPPF) (RD/NP/010)
- National Planning Practice Guidance (NPPG) (RD/NP/020)

### **Government Regulations and Acts:**

- Written Ministerial Statement (25 March 2015) (RD/Gov/200)
- Lifetime Neighbourhoods (Department for Communities and Local Government (December 2011) (RD/H/830)

### **Cambridge and South Cambridgeshire Submission Documents:**

- Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)
- Schedule of Proposed Minor Changes following Proposed Submission Consultation (March 2014) (RD/Sub/SC/040)

### **Adopted Development Plans:**

- South Cambridgeshire District Council Development Control Policies Development Plan Document (RD/AD/110)

### **Supplementary Planning Documents:**

- Public Art Supplementary Planning Document (RD/SPD/050)
- District Design Guide Supplementary Planning Document (RD/SPD/080)

### **Other:**

- Council's Hearings Statement for Matter SC5B: Delivering High Quality Homes (SC5B/SCDC)

## Appendix 2: List of Proposed Modifications to South Cambridgeshire Local Plan

The proposed modifications set out below relate to a number of policies and their supporting text in Chapter 4: Climate Change of the South Cambridgeshire Local Plan<sup>23</sup>. Text to be deleted is shown as a ~~strikethrough~~ and text to be added is shown in **bold and underlined**.

The references to page and paragraph numbers in the table below do not take account of the deletion or addition of text proposed through modifications submitted previously.

Page	Policy/Paragraph	Modification	Justification
100	<b>Policy HQ/1: Design Principles</b>	If necessary for soundness, amend criterion 1d of Policy HQ/1 to read:  'Be compatible with its location and appropriate in terms of scale, <b><u>density</u></b> , mass, form, siting, design, proportion, materials, texture and colour in relation to the surrounding area;'	If the Inspectors consider it necessary for soundness to include reference to density within the policy, the Council suggests the following amendment.
100	<b>Policy HQ/1: Design Principles</b>	Amend Criterion 1f of Policy HQ/1 to read:  'Achieve a permeable development with ease of movement and access for all users and abilities, with user friendly and conveniently accessible streets <b><u>and other routes</u></b> both within the development and linking with its surroundings and existing and proposed facilities and services, focusing on delivering attractive and safe opportunities for walking, cycling, <del>and</del> public transport <b><u>and, where appropriate, horse riding;</u></b> '	Modification to Policy HQ/1 to ensure new development takes into consideration the needs of horse riding.  This modification supersedes MC/5/04 previously published in Schedule of Proposed Minor Changes following Proposed Submission Consultation (March 2014) (RD/Sub/SC/040).
101	<b>Policy HQ/1: Design Principles</b>	Amend criterion n of Policy HQ/1 to read:  'n. Protect the health and amenity of occupiers and surrounding uses from development that is overlooking, overbearing or results in a loss	Modification to clarify the intention of the policy in ensuring that development avoids unacceptable impacts on surrounding occupiers

<sup>23</sup> RD/Sub/SC/010

Page	Policy/Paragraph	Modification	Justification
		of daylight which avoids <del>or development which would create</del> unacceptable impacts such as noise, vibration, odour, emissions and dust;'	and uses from the generated land use as well as the physical structures.
102	<b>Policy HQ/2: Public Art and New Development</b>	Add a new paragraph after paragraph 1 in Policy HQ/2 to read:  <b><u>'2. Where development is unable to achieve an appropriate scheme on site the Council will encourage developers to make a financial contribution to support public art initiatives. Financial contributions may be pooled, where appropriate.'</u></b>	Modification to provide clarity on financial contributions for public art and pooling contributions.
103	Paragraph 5.13	Replace paragraph 5.13 with the following:  <b><u>'Further guidance to support Policy HQ/2 will be provided in a District Design Guide SPD.'</u></b>	Updating to reflect the Council's intention to include public art within the District Design Guide SPD rather than a revised Public Art SPD.

**Appendix 3: Extract from the Council's Hearings Statement for Matter SC5B:  
Delivering High Quality Homes**

**SC5B.2.iv**

**Is the paragraph 3 of the policy justified as the Written Ministerial Statement dated 25 March 2015 requires that Councils should not set in their emerging Local Plans any requirements relating to the performance of buildings?**

45. The NPPF<sup>24</sup> at paragraph 50 requires local planning authorities to plan for a mix of housing, based on demographic trends, market trends and the needs of groups such as families with children, older people, people with disabilities and others.
46. The NPPG at paragraphs 005 to 010<sup>25</sup> (Ref ID: 56-005-20150327 to Ref ID: 56-010-2050327 makes clear that if access standard policies are to be included in Local Plans there must be evidence of need, of viability, and be limited to application of Requirement M4 (2) (accessible and adaptable dwellings), and/or M4 (3) (Wheelchair user dwellings) standards only of the Building Regulations 2015. Accessible and adaptable dwellings are similar to the previous Lifetime Homes standard.
47. As paragraph 7.29 of the supporting text to policy H/8 makes clear South Cambridgeshire does not require the provision of wheelchair standard homes except where there is an identified need and then only as an affordable home.
48. In respect of accessible and adaptable homes the Council accepts that there is insufficient needs evidence to justify that all new affordable homes should be built to Requirement M4(2) (accessible and adaptable dwellings) standard.
49. It nevertheless remains the case that 9% of all households in England had one or more people with long term limiting disability that required adaptations to their home<sup>26</sup>, and that the proportion of older people and those with disabilities in the district will grow up to 2031<sup>27</sup>. Across England 12.5% of households allocated an affordable rented property in 2011/12 were identified as '*unable to work due to sickness or disability*' (Table 752: general needs social lettings made by housing association and local authority landlords; statistical data sets CORE)<sup>28</sup>. Those identified with a medical need to move from within the South Cambridgeshire housing waiting list represent 6.9% of all applicants [the majority of these are likely to be older people] (SCDC Housing Waiting List data 30/9/15).

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<sup>24</sup> RD/NP/010

<sup>25</sup> RD/NP/020 <http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/accessibility-and-wheelchair-housing-standards/>

<sup>26</sup> RD/H/780 English Housing Survey – Adaptations and Accessibility Report, 2014-15 page 1  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/539541/Adaptations\\_and\\_Accessibility\\_Report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf)

<sup>27</sup> RD/Sub/SC/060 Annex A Chapter 7 pages A571 to A576

<sup>28</sup> Continuous Record of Lettings (CORE) system

[https://data.gov.uk/dataset/social\\_lettings\\_tables/resource/54456915-e931-41c1-b422-2494776f333d](https://data.gov.uk/dataset/social_lettings_tables/resource/54456915-e931-41c1-b422-2494776f333d)

50. On the basis of this needs data and in recognition that many homes can be modified or used differently to meet changing housing needs, the Council considers that it would be reasonable to make a Proposed Modification to part 3 of the Policy, subject to consideration by members in November 2016. Delete part 3 and replace with:

**“3. 5% of homes in a development should be built to the accessible and adaptable dwellings M4(2) standard rounding down to the nearest whole property. This provision shall be split evenly between the affordable and market homes in a development rounding to the nearest whole number.”**

51. Consequential amendments to paragraph 7.28 would also be necessary as follows:

“7.28 Local evidence shows that in Council housing up to 41% of households include someone with a disability<sup>29</sup>. This figure falls to 14.3% of private sector households of which just less than half have mobility problems. A breakdown of household composition in the district in 2011 can be read in the ‘key facts’ box at the start of this chapter. Building ~~all affordable homes and~~ 5% of private new homes **on sites of 20 or more** to the **M4(2) standard (accessible and adaptable dwelling standard)** Lifetime Homes Standard will help ensure that our housing stock will better meet the needs of all our residents. ~~The Lifetime Homes Standard (November 2011) is a widely used national standard for ensuring that the spaces and features in new homes can readily meet or be simply adapted to meet, the needs of most people, including those with reduced mobility”.~~

52. In regard to viability the first point to note is that there would be no requirement to make any provision in individual developments that provide fewer than 20 affordable or market homes. Furthermore the Cambridge and South Cambridgeshire Local Plans Viability Update Report (November 2015)<sup>30</sup> states with regard to the submitted policy H/8 part 3 that:  
*‘The results indicate that although there is a minor impact on viability, this is marginal and we are of the opinion that the sensitivity of the results to the change in costs is not one that can be easily differentiated. On that basis it is unlikely that this would lead to a previously viable scheme becoming unviable’.*

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<sup>29</sup> RD/H/030 South Cambridgeshire Housing Strategy 2012-2016 page 27

<sup>30</sup> RD/MC/090 paragraph 3.3.4