

RD/GEN/530



Cambridge Local Plan and South Cambridgeshire
Local Plan

**Working Correspondence with Programme
Officer Regarding Main Modifications**

Cambridge City Council and
South Cambridgeshire District Council

14 November 2017

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Wed 20/09/2017 14:15

From: Programme Officer

To: Caroline Hunt; Julian Sykes

Re: Proposed Main Modifications

The note below has been provided by the Inspectors for both Councils' attention:

We are close to finishing our consideration of the lists of proposed main modifications supplied to us by both Councils. In the interests of making timely progress we are writing to you now to provide an early indication of some additions and changes to the schedules which we consider to be necessary. There may be additional matters which require attention and we will advise you of those as soon as possible.

Early review of the Plan

The memorandum of Understanding (RD/STRAT/350) indicated that, as part of the City Deal arrangements, the Councils have agreed to prepare a joint Local Plan starting in 2019. The issue of whether this commitment should be included in the Local Plans was discussed under issue PM1B.4.

Having now had the opportunity to consider all the evidence we are of the view that there are a limited number of issues where a commitment to an early review is necessary to ensure that the Plans can be found sound. These include:

The objective assessment of housing needs;

An early assessment of the progress towards implementing the strategy, in particular the proposed new settlements;

The need to consider the implications of an assessment, required by the Housing Act 1985, as amended by the Housing and Planning Act 2016, of the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed. This point has particular relevance for the South Cambridgeshire Local Plan.

We are therefore asking you to draw up suitable policies for our consideration for inclusion in the list of main modifications. You may find it helpful to have regard to the findings of the Inspector who carried out the Examination into the Luton Local Plan, and main modification 56 in the Appendix to his report, which inserts a new policy relating specifically to the review of the Plan. In particular, it is instructive to note that the policy sets a timeframe for the commencement of the review and its submission for examination (rather than adoption).

South Cambridgeshire Local Plan

Land at London Road, Sawston

This employment site which was considered under Matter SC1.5I is shown in the submission draft Local Plan as being part of Pampisford, which is classified as an infill

village. Although the site lies within Pampisford parish it is contiguous with the Rural Centre of Sawston and is separated from the village of Pampisford by a stretch of open countryside. The Council's own evidence concludes that the site 'better relates to Sawston' and included a proposed change to include the site in the Sawston Development Framework in its Issues and Options 2 Document. The change was not carried forward into the submission draft Plan because it 'did not have local support'.

However, the Council was not able to point to any *planning reasons* why the site should continue to be included in the Pampisford Development Framework and I note that parish boundaries are not included in the criteria that were used to define the settlement boundaries. We have, therefore, come to the view that the submission plan is not sound in relation to this matter because it is not justified by the evidence. However, we consider that the Plan can be made sound by the inclusion of Main Modifications which amend the Development Framework Boundary of both Pampisford and Sawston, so that this site falls within Sawston, and we are asking you to draft appropriate modifications for inclusion in the forthcoming round of consultation.

At this stage in the proceedings the Inspectors are content for exchanges between the Inspectors and the Councils be by email through the Programme Officer and need not be published although should be retained as could be subject to FOI requests.

I look forward to your response regarding the above.

Kind regards

Gloria Alexander

Programme Officer

Thu 21/09/2017 17:06

From: Jonathan Dixon

To: Programme Officer

Re: Cambridge and south cambs local plan examinations - mods

Hi Gloria,

Thanks for the catch up earlier regarding the inspectors' progress on the consideration of modifications. I have updated the teams.

As we discussed, whilst you are away it would be helpful to continue receive any issues on an ongoing basis, to deal with as much as possible ahead of time.

If we are to get the mods out and the consultation period completed before Christmas if at all possible, it would mean starting the consultation as early as possible in November, so anything we can do in advance would be helpful.

Enjoy your holiday.

Thanks,

Jonathan Dixon | Principal Planning Policy Officer

Sun 15/10/2017 18:51

From: Caroline Hunt

To: Programme Officer

Re: Proposed Main Modifications

Attachments: Early Plan Review Proposed Modification.doc; Indicative Draft Outline Joint LP Programme.xls

Dear Gloria

Thank you for your email of 20 September regarding proposed main modifications.

This response is on behalf of both Councils, provided for your return from holiday as you indicated.

We are encouraged to hear that the Inspectors are close to finishing their consideration of the proposed main modifications provided by the Councils.

We have considered the Inspectors' request that the Councils draw up suitable policies for the Inspectors' consideration for inclusion in the list of main modifications in relation to an early review of the Plans.

In accordance with the helpful guidance given by the Inspectors, we have prepared proposed policies that reflect generally the approach taken in the Luton Local Plan Modifications and supporting text. The draft modifications are consistent for both Plans but separate Modifications have been prepared to assist the Inspectors.

In doing so we have responded to the Inspectors' guidance on timeframes, and we have had regard to the Luton Local Plan Inspector's Report and his approach that recommends the inclusion within the Luton Local Plan of target dates for commencing and submitting the Local Plan review.

We have needed to prepare an indicative draft outline programme for preparation of the joint Local Plan to help inform the appropriate dates for inclusion in the proposed new policy. However, please note that the indicative draft outline programme will need further detailed consideration as we prepare a new Local Development Scheme in due course and is intended for the Inspectors' information only and not for publication. The indicative draft outline programme takes account of key relevant events including the anticipated date for the Greater Cambridge and Greater Peterborough Mayor's proposed non-statutory spatial plan being finalised of March 2019, elections and key holiday periods. Having regard to these events it is anticipated that submission would take place by end of summer in 2022. Clearly the proposed policy would allow for an earlier submission date if this proves possible. The indicative draft outline programme is attached for the Inspectors' information.

The attached modification schedule also includes a proposed modification to the South Cambridgeshire Local Plan to address the Inspectors' request in relation to the Sawston development framework boundary and the employment area.

We hope this assists the Inspectors in finalising the list of proposed modifications they consider necessary to make the Plans sound.

The Councils are keen to assist the Inspectors in progressing the modifications consultation as soon as possible, and to enable this it would be helpful to have further clarity on the process that the Inspectors envisage moving forward to the Proposed Modifications consultation.

Please can the Inspectors advise if they will be providing the Councils with a formal letter and list of Proposed Modifications as the first step in the process? Clearly we will need to prepare a Sustainability Appraisal Addendum to form part of the Proposed Modifications consultation and the Councils have already undertaken some work on this at risk to expedite the process. Alternatively are the Inspectors proposing providing a draft schedule of Modifications to the Councils to prepare the SA Addendum for their consideration prior to sending us a final list for consultation?

Assuming the former approach, please can the Inspectors confirm that they would not be asking the Councils to publish the Inspectors' letter and list of Modifications until the SA has been completed and the consultation period begins? This is the Councils' preference as clearly there will be significant interest in the Proposed Modifications and we would be concerned at the distraction that earlier publication could cause the Councils in preparing for the consultation and it would also be confusing for the public if it is published before there is opportunity to comment.

Clarification on the process from the Inspectors as soon as possible would be of great assistance to the Councils so we can plan effectively for the upcoming Modifications consultation.

It would also be helpful to have advance notice of when we can expect to receive the Inspectors' letter to the Councils, as soon as the Inspectors are in a position to do so.

If the Inspectors have any additional matters that require the Councils' attention we wish to assure the Inspectors that we will give urgent attention to them in order to move forward to Modifications consultation as soon as possible and we are keen to be in a position to complete the 6 week consultation before Christmas if at all possible.

Happy to discuss any of these matters if it would be helpful.

Kind regards

Caroline

Caroline Hunt | Planning Policy Manager

Proposed Main Modifications to the Proposed Submission Local Plans of Cambridge and South Cambridgeshire – Response to Inspectors’ Email of 20 September 2017

South Cambridgeshire Local Plan

Mod Ref.	Local Plan Page	Policy / Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
Chapter 2: Spatial Strategy					
SC-MMXXX	42	After proposed paragraph 2.70a	<p>Add new Policy S/13 and supporting text after proposed paragraph 2.70a as follows:</p> <p><u>Policy S/13: Review of the Local Plan</u></p> <p><u>The Council will undertake an early review of the Local Plan to commence before the end of 2019 and with submission to the Secretary of State for examination anticipated by the end of Summer 2022. The new Local Plan will be prepared jointly by Cambridge and South Cambridgeshire Councils for their combined districts (Greater Cambridge). Specific matters to be addressed by the review include the following:</u></p> <ul style="list-style-type: none"> <u>a. an updated assessment of housing needs.</u> <u>b. the progress being made towards implementation of the spatial strategy for Greater Cambridge, in particular the new settlements at Waterbeach and Bourn Airfield.</u> <u>c. working with the local housing authority, consideration of the implications of an assessment, required</u> 	<p>The Councils have responded to the Inspectors’ request to draw up a suitable policy providing a commitment to an early review. The timetable proposed for the review is based on a programme allowing for two stages of consultation (Regulation 18) and a formal Proposed Submission consultation (Regulation 19) to be undertaken over a two year period, followed by plan Submission.</p> <p>The Councils agree that inclusion of a submission date in the policy is more appropriate and practical than inclusion of a date by which a new plan is to be adopted. The inclusion of an adoption date would risk that it be treated as a sunset clause for the current plan, which is considered to be a wholly inappropriate and unworkable approach.</p>	No

Mod Ref.	Local Plan Page	Policy / Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
			<p><u>by the Housing Act 1985, as amended by the Housing and Planning Act 2016, of the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.</u></p> <p><u>2.70b Through the Greater Cambridge City Deal the Councils committed to an early review of their local plans beginning in 2019. This was in order to establish what impact the anticipated changed infrastructure landscape and economic growth in the area might have on housing need and other aspects of spatial and transport planning. In addition during the public examination hearings into the Local Plan a number of issues were highlighted for specific attention in the next review of the Local Plans. These relate to the assessment of housing needs, progress in delivering the development strategy and in particular the new settlements, and provision to meet the requirements of caravan dwellers. Policy S/13 accordingly requires that the next full review of the Local Plan should start in 2019 with submission for examination anticipated by the end of Summer 2022.</u></p> <p><u>Furthermore, a non-statutory spatial plan is being prepared for the Cambridgeshire and Peterborough Combined Authority. It is expected that, although non-statutory, the</u></p>		

Mod Ref.	Local Plan Page	Policy / Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
			<u>spatial plan will provide a strategy for the wider area that will inform the form and content of the joint local plan and should therefore precede its preparation.</u>		
SC-MMXXX	33	After paragraph 2.54	Add new paragraph 2.54a as follows: <u>For the purposes of village classification and related Local Plan policies, part of Pampisford parish west of London Road on the southern end of Sawston will be treated as if part of the Rural Centre of Sawston. It is therefore included within the Sawston development framework boundary and shown on the Sawston Inset of the Policies Map. It is shown as an area covered by another map on the Pampisford Inset of the Policies Map. It remains part of Pampisford parish.</u>	The great majority of the area is an employment site which lies contiguous with the built up area of Sawston and separated from the village of Pampisford by open countryside. There are no planning reasons why redevelopment proposals in the area should be treated differently than if the site were actually within Sawston.	No

Cambridge Local Plan

Mod Ref.	Local Plan Page	Policy / Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
Section 9: Providing the infrastructure to support development					
CC-MMXXX	36	After paragraph 2.75	Add new policy 8a (after policy 8) and supporting text after paragraph 2.75 as follows: <u>Policy 8a: Review of the Local Plan</u> <u>The Council will undertake an early review of the Local Plan to commence before the end of 2019, and with submission to the Secretary of</u>	The Councils have responded to the Inspectors' request to draw up a suitable policy providing a commitment to an early review. The timetable proposed for the review is based on a programme allowing for two stages of consultation (Regulation 18) and a formal Proposed	No

Mod Ref.	Local Plan Page	Policy / Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
			<p><u>State for examination anticipated by the end of Summer 2022. The new Local Plan will be prepared jointly by Cambridge and South Cambridgeshire Councils for their combined districts (Greater Cambridge). Specific matters to be addressed by the review include the following:</u></p> <ul style="list-style-type: none"> <u>a. an updated assessment of housing needs.</u> <u>b. the progress being made towards implementation of the spatial strategy for Greater Cambridge including the new settlements at Waterbeach and Bourn Airfield.</u> <u>c. working with the local housing authority, consideration of the implications of an assessment, required by the Housing Act 1985, as amended by the Housing and Planning Act 2016, of the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.</u> <p><u>2.76 Through the Greater Cambridge City Deal the Councils committed to an early review of their local plans beginning in 2019. This was in order to establish what impact the anticipated changed infrastructure landscape and economic growth in the area might have on housing need and other aspects of spatial and</u></p>	<p>Submission consultation (Regulation 19) to be undertaken over a two year period followed by plan submission.</p> <p>The Councils agree that inclusion of a submission date in the policy is more appropriate and practical than inclusion of a date by which a new plan is to be adopted. The inclusion of an adoption date would risk that it be treated as a sunset clause for the current plan, which is considered to be a wholly inappropriate and unworkable approach.</p>	

Mod Ref.	Local Plan Page	Policy / Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
			<p><u>transport planning. In addition during the public examination into the adopted Local Plan a number of issues were highlighted for specific attention in the next review of the Local Plans. These relate to the assessment of housing needs, progress in delivering the development strategy and in particular the new settlements, and provision to meet the requirements of caravan dwellers. Policy 8a accordingly requires that the next full review of the Local Plan should start in 2019 with submission for examination anticipated by the end of Summer 2022.</u></p> <p><u>Furthermore, a non-statutory spatial plan is being prepared for the Cambridgeshire and Peterborough Combined Authority. It is expected that, although non-statutory, the spatial plan will provide a strategy for the wider area that will inform the form and content of the joint local plan and should therefore precede its preparation.</u></p>		

Tue 17/10/2017 12:42

From: Jonathan Dixon

To: Programme Officer

Re: Proposed Main Modifications - Sawston & Pampisford Development Framework

Attachments: Mods Schedule for Sawston and Pampisford map changes Oct 17.doc; DRAFT Sawston and Pampisford Development Framework mods maps.pdf

Dear Gloria,

Following up your email of 20 September, and the subsequent reply from Caroline Hunt of 15 October, please find attached an additional modification schedule setting out the modifications to the South Cambs Policies Map that would be required to address the inclusion of an area of Pampisford within the development framework of Sawston, including the policies maps illustrating these changes.

Please let us know if these require any amendments to reflect the Inspectors' proposed modification.

Regards,

Jonathan Dixon | Principal Planning Policy Officer

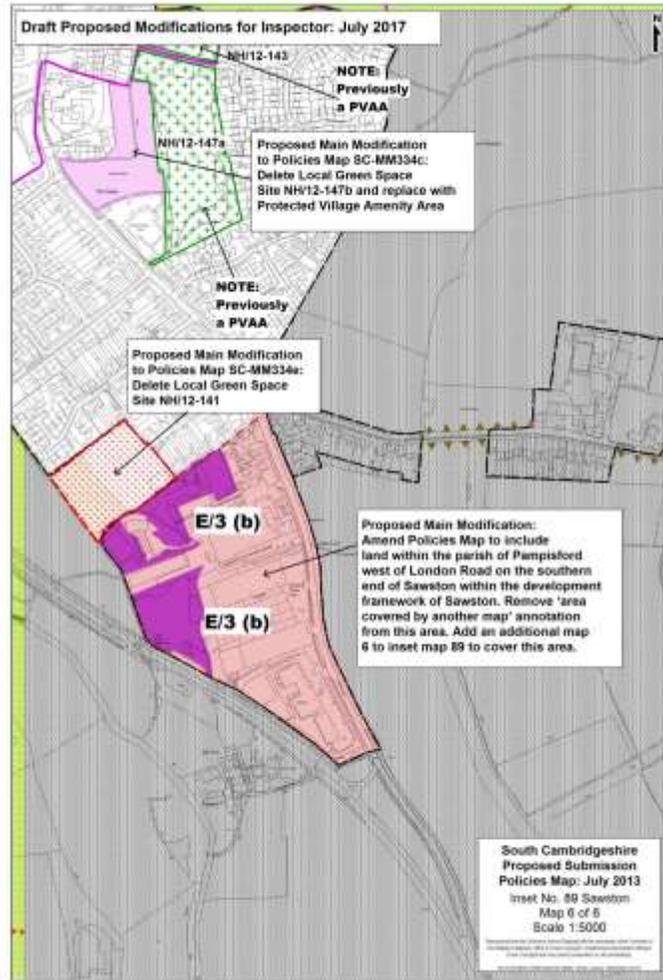
Proposed Main Modifications to the Proposed Submission Local Plans of Cambridge and South Cambridgeshire – Response to Inspectors’ Email of 20 September 2017

Modifications to Policies Map to address Sawston / Pampisford Development Framework Modification

South Cambridgeshire Local Plan

Mod Ref.	Local Plan Page	Policy / Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
Policies Map					
SC-MMXXX	District Wide Policies Map	South East Quadrant	Amend Policies Map to increase area covered by inset 89 Sawston.	Source: Inspectors’ email of 20 September 2017 Consequential amendment resulting from the inclusion of an area of Pampisford within the Sawston development framework.	No
SC-MMXXX	Inset 85	Pampisford Inset Map	Amend Policies Map to exclude land within the parish of Pampisford west of London Road on the southern end of Sawston from the development framework of Pamipisford, and annotate as ‘area covered by another map’. <i>Refer to Map at the end of this schedule.</i>	Source: Inspectors’ email of 20 September 2017 The great majority of the area is an employment site which lies contiguous with the built up area of Sawston and separated from the village of Pampisford by open countryside.	No

				There are no planning reasons why redevelopment proposals in the area should be treated differently than if the site were actually within Sawston.	
SC-MMXXX	Inset 89	Sawston Inset Map	Amend Policies Map to include land within the parish of Pampisford west of London Road on the southern end of Sawston within the development framework of Sawston. Remove 'area covered by another map' annotation from this area. Add an additional map 6 to inset map 89 to cover this area. <i>Refer to Map at the end of this schedule.</i>	Source: Inspectors' email of 20 September 2017 The great majority of the area is an employment site which lies contiguous with the built up area of Sawston and separated from the village of Pampisford by open countryside. There are no planning reasons why redevelopment proposals in the area should be treated differently than if the site were actually within Sawston.	No



Fri 20/10/2017 11:35

From: Programme Officer

To: Caroline Hunt

Re: Proposed Main Modifications

Attachments: South Cambridgeshire DC Oct 2017.pdf

Dear Caroline

Attached for your information is a note containing the Inspectors' advice relating to the proposed main modifications schedule for South Cambs with which they were provided.

Please get back to me if there are any queries.

Kind regards

Gloria

Gloria Alexander
Programme Officer

South Cambridgeshire Council

We have now finished our consideration of the schedules of main modifications supplied to us by both Councils. In addition to the matters we have already raised we are asking you to address the following issues:

Five year housing land supply:

In their statement for Matter 8, the Councils provided information on housing completions compared with the targets set out in the adopted development plans from the years 1999/2000 to 2013/2014. Since the adoption of the Cambridge City Local Plan in 2006, the annualised housing target has been met only once. In the years preceding the adoption of the Local Plan 2006, the targets in the adopted structure plans were met only once, although in the year 2005/2006, completions were very close to the target.

In South Cambridgeshire, completions met or exceeded the target set out in the adopted Local Plan 2004 or Core Strategy 2007 on only 4 occasions. In the four years preceding the adoption of the Local Plan 2004, the adopted Structure Plan target was met twice.

The reasons for the failure to deliver housing at the required rates will include factors beyond the Councils' control, including poor market conditions in the years following the recession in 2007/2008. Nonetheless, the failure to meet targets in so many years across the 15 year period represents persistent underdelivery, and we conclude that the appropriate buffer should be 20% for both Councils when considered alone and for the joint trajectory.

Furthermore, to avoid the need for such matters to be revisited at subsequent s78 appeals, the Plans should set out the key assumptions/parameters that are relied on to calculate the five year housing land supply. This is often successfully done in a table which establishes the housing requirement; any shortfall since the start of the plan period (South Cambridgeshire); and the 20% buffer.

In relation to addressing the shortfall during the early years of the plan period we are persuaded that the 'Liverpool method' is appropriate because of the reliance on New Settlements which will take time to deliver new housing. The table should then go on to calculate the housing land supply in years in the usual manner. We are aware that some of this information is included in the Annual Monitoring Reviews for both Councils, although the methodology for deriving the housing land supply figures is not entirely clear and, in any event, it is important to establish the baseline figures in the Plans themselves.

We are therefore asking you to draft modifications which set out the key factors described above. The modifications for each plan should set out the information for its own area and both plans should include the same information based on the joint trajectory. The date of the information used should be clearly referenced and should be as close to the expected adoption date (2018) as reasonably possible.

Affordable Housing

The proposed modification SC-MM192 to Policy H/9 of the draft plan would not be consistent with the Written Ministerial Statement, November 2014 (as amended in March 2015) [WMS]. This issue was considered at the hearing on 1 December 2016 in respect of Matter SC5B.

We have considered all of the evidence provided by the Council in support of the proposed modification in terms of viability and local circumstances. We have also given consideration to the judgement by the Court of Appeal in the case of the Secretary of State for DCLG v West Berks Council.

We are also aware of the appeal decisions cited. Whilst those decisions covered similar ground in terms of viability and local circumstances, in those cases, the relevant policies were adopted before the Court of Appeal decision. The Inspectors were therefore able to rely on the provisions of paragraph 196 of the NPPF that the planning system is plan led and the WMS was a material consideration which, on the basis of the evidence in those cases, did not outweigh the relevant adopted plan policy.

Furthermore, an appeal decision relates to a particular site and local circumstances at a given point in time whereas allowing a relaxation from national policy in a local plan has far greater long term implications.

We are also mindful of Paragraph 7.33 of Policy H/9 which provides for viability testing for individual sites. However, the purpose of the WMS is not to ensure that small scale developments are rendered viable. Rather, it is to encourage

development on smaller brownfield sites and to help diversify the house building sector by providing a boost to small and medium sized developers.

We are therefore inviting the Council to amend the wording of the policy in order to remove the conflict with the WMS.

Policy E/1B (SC-MM212)

The Council has argued that paragraph 21 of the Framework requiring flexibility when allocating employment land provides the exceptional circumstances necessary for this allocation in the GB. However, there appears to be some doubt about the deliverability of the site and whether the Council would have to resort to compulsory purchase procedures. We consider that this is a matter which can be investigated further through the early review of the plan.

We are therefore asking you to add the following text to SC-MM213: *There is some uncertainty regarding the availability of access to the site. This is a matter which will be considered further through the early review of the Plan.*

Policy E/2: Fulbourn Road East (Fulbourn) 6.9hectares

The proposed modifications to the Plan seek to reduce the size of the allocation from 6.9ha to 4.3ha as a consequence of the findings in the 2015 GB review. The reason is predicated on the assertion that the land to the east of the Yarrow Road traffic island represents the furthest extent of the urban area from the historic core.

There is however, a reasonably recent two storey residential development referred to as the Alms House development which extends eastwards along the north side of Cambridge Road to a point almost identical to the original east boundary of the allocation which is delineated by a well-established hedgerow adjacent to the access point to Westbourn Farm.

Inspector Wood viewed the site and its environs on 2 March 2017. From his observations, the Alms Houses development does form an integral part of the street scene in this location and provides a natural break to the built development. On the north side of the road it adjoins the entrance road to the Fulbourn Hospital site and its eastern extremity coincides with the farm access hedgerow on the south side of the road. Accordingly, we find no compelling reason to find the submitted Plan unsound.

The owners of the land adjacent to the Peterhouse Technology Park which would remain if the eastern element of E/2 was removed have indicated that they are not willing at this stage to release the land. However, this could change over the period of the plan and can be investigated further in conjunction with the proposed early review of the Plan.

We are, therefore, asking you to delete SCMM214, SCMM215 and SCMM314c from the final schedule of proposed modifications. As these modifications have already been subject to consultation, this has no impact on the forthcoming consultation exercise.

Green Belt: Policy NH/8

The draft policy requires that development proposals **outside but in the vicinity of the Green Belt** should not have an adverse effect on the openness of the Green Belt. We can, however, find no specific requirement in Section 9 of the National Planning Policy Framework to support this approach. Whilst one of the essential characteristics of Green Belts is their openness this stricture is confined to development proposals within Green Belts. In the circumstances we are asking you to revise the wording of SC-MM159, 160 and 161 as follows:

Policy NH/8: Mitigating the Impact of Development in the Green Belt

1. Any development proposals within the Green Belt must be located and designed so that they do not have an adverse effect on the rural character and openness of the Green Belt.
2. Where development is permitted in the Green Belt, landscaping conditions, together with a requirement that any planting is adequately maintained, will be attached to any planning permission in order to ensure that the impact on the Green Belt is mitigated.
3. Development on the edge of settlements which are surrounded by Green Belt shall include careful landscaping and design measures of a high quality.

6.34 The NPPF gives strong protection to the Green Belt. The area of Green Belt in South Cambridgeshire comprises 23,000 hectares covering over 25% of the district. This means much of the district is affected by Green Belt policies particularly around those villages surrounding Cambridge. There are no villages within the Cambridge Green Belt; each is an 'island' inset within the Green Belt with its own defined development framework boundary.

6.35 Green Belt is a key designation in the district, which protects the setting and special character of Cambridge. Inappropriate development is by definition harmful to the Green Belt and will not be approved except in very special circumstances in accordance with the NPPF.

Policy NH/9 - SC-MM162 (add the word 'with' between the words consistent and Policies in the second line of paragraph a.)

SC-MM163 (delete the last sentence in paragraph 6.36 beginning "There are no....")

Policy NH/14 SC-MM170 (Amend 3rd sentence: Where development would lead to the substantial harm or total loss of significance of a designated asset, the local planning authority should refuse consent unless **it can be** demonstrated **that** it is necessary to achieve substantial public benefit that **would** outweigh the harm or loss.)

Gypsy and Traveller policies

Text should be added to the proposed modifications to reflect the requirements under the Housing Act 1985 (as amended) to consider the needs of people residing in or resorting to the District with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. The Plan should include a commitment by the Council to consider the results of such an assessment through the early review of the Plan, including whether any site allocations should be made to meet any need identified.

Other matters

SC-MM151, SC-MM225, SC-MM230 We do not consider that these modifications are necessary for soundness.

Appendix Bb: List of Local Green Space Sites (shown on the Policies Map)

SC-MM276 Delete one of the references to NH/12-047-West of Sovereign Way, Cottenham to avoid duplication

NH/12-107a should read Recreation Ground, Lolworth

Delete "and Millennium Copse" from the title of NH/12-109a

NH/12-122 Land between Worcester Way and Armingford Crescent, Melbourn has not been designated and should therefore have a line through it.

Policies Map

SC-MM325 (add bullet point above the existing bullet point to read: Glebe Land (NH/12-098a)

SC-MM339 (a-c) (d-delete "land to the north of Bannold Road" and replace with "Barracks Frontage NH/12-167")

SC-MM340 (reinstate the modification; change the site reference to "Newton Road Play Area NH12-171")

Appendix C: Glossary

"Code for Sustainable Homes" The code has been withdrawn so the definition can be deleted. However, we do not think this a soundness issue.

Next steps

We are inviting you to draft additional or amend the proposed modifications to address the issues set out above. We do not wish to see the full revised schedules again, just those modifications which are new or subject to significant change. Once these have been agreed by us, we are content for the Councils to prepare the schedule of proposed modifications for consultation and to carry out SA as necessary.

Please note that only those modifications which have not been subject to formal consultation already should be included. Where it is necessary to include text from previous modifications for clarity, it would be helpful to distinguish that in the text. We do not need to review the SA prior to consultation commencing. It will help to expedite the production of our reports if the Councils take a rigorous approach to accepting only those representations that relate to the advertised modifications.

Consultation should take place on the basis that the Inspectors have indicated that the proposed modifications may be necessary for soundness. Our final conclusions will be given in our reports.

We are not asking you to publish the email exchanges between yourselves and the Programme Officer relating to the proposed modifications as this can be considered to be 'work in progress'. However, these emails should be retained as they may be subject to FOI requests.

Fri 20/10/2017 11:35

From: Programme Officer

To: Julian Sykes

Re: Cambridge City Council Proposed Main Modifications

Attachments: Cambridge City Council Oct 2017.pdf

Dear Julian

Attached for your information is a note containing the Inspectors' advice relating to the proposed main modifications schedule for Cambridge City with which they were provided.

Please get back to me if there are any queries.

Kind regards

Gloria

Gloria Alexander
Programme Officer

Cambridge City Council

We have now finished our consideration of the schedules of main modifications supplied to us by both Councils. In addition to the matters we have already raised we are asking you to address the following issues:

Five year housing land supply:

In their statement for Matter 8, the Councils provided information on housing completions compared with the targets set out in the adopted development plans from the years 1999/2000 to 2013/2014. Since the adoption of the Cambridge City Local Plan in 2006, the annualised housing target has been met only once. In the years preceding the adoption of the Local Plan 2006, the targets in the adopted structure plans were met only once, although in the year 2005/2006, completions were very close to the target.

In South Cambridgeshire, completions met or exceeded the target set out in the adopted Local Plan 2004 or Core Strategy 2007 on only 4 occasions. In the four years preceding the adoption of the Local Plan 2004, the adopted Structure Plan target was met twice.

The reasons for the failure to deliver housing at the required rates will include factors beyond the Councils' control, including poor market conditions in the

years following the recession in 2007/2008. Nonetheless, the failure to meet targets in so many years across the 15 year period represents persistent underdelivery and we conclude that the appropriate buffer should be 20% for both Councils when considered alone and for the joint trajectory.

Furthermore, to avoid the need for such matters to be revisited at subsequent s78 appeals, the Plans should set out the key assumptions/parameters that are relied on to calculate the five year housing land supply. This is often successfully done in a table which establishes the housing requirement; any shortfall since the start of the plan period (South Cambridgeshire); and the 20% buffer.

In relation to addressing the shortfall during the early years of the plan period we are persuaded that the 'Liverpool method' is appropriate because of the reliance on New Settlements which will take time to deliver new housing. The table should then go on to calculate the housing land supply in years in the usual manner. We are aware that some of this information is included in the Annual Monitoring Reviews for both Councils, although the methodology for deriving the housing land supply figures is not entirely clear and, in any event, it is important to establish the baseline figures in the Plans themselves.

We are therefore asking you to draft modifications which set out the key factors described above. The modifications for each plan should set out the information for its own area and both plans should include the same information based on the joint trajectory. The date of the information used should be clearly referenced and should be as close to the expected adoption date (2018) as reasonably possible.

Affordable Housing

The proposed modification CC-MM130 to Policy 45 of the draft plan would not be consistent with the Written Ministerial Statement, November 2014 (as amended in March 2015) [WMS]. This issue was considered at the hearing on 25 April 2017 in respect of Matter CC6B.

We have considered all of the evidence provided by the Council in support of the proposed modification in terms of viability and local circumstances. We have also given consideration to the judgement by the Court of Appeal in the case of the Secretary of State for DCLG v West Berks Council.

We are also aware of the appeal decisions cited. Whilst those decisions covered similar ground in terms of viability and local circumstances, in those cases, the relevant policies were adopted before the Court of Appeal decision. The Inspectors were therefore able to rely on the provisions of paragraph 196 of the NPPF that the planning system is plan led and the WMS was a material consideration which, on the basis of the evidence in those cases, did not outweigh the relevant adopted plan policy.

Furthermore, an appeal decision relates to a particular site and local circumstances at a given point in time whereas allowing a relaxation from national policy in a local plan has far greater long term implications.

We are also mindful of Paragraph 6.4 of Policy 45 which includes a provision whereby if a developer considers that meeting the affordable housing target percentage will be unviable, robust evidence of this must be provided in the form of an independent viability appraisal.

However, the number of additional affordable homes from developments of nine dwellings or less would only form a relatively small part of the overall affordable housing delivery. Furthermore, the purpose of the WMS is not to ensure that small scale developments are rendered viable. Rather, it is to encourage development on smaller brownfield sites and to help diversify the house building sector by providing a boost to small and medium sized developers.

We are therefore inviting the Council to amend the wording of the policy in order to remove the conflict with the WMS. In this respect, you may find it helpful to have regard to the findings of the Inspector who carried out the examination into the Central Lincolnshire Local Plan which concluded that the thresholds should be in line with the WMS.

CC-MM053 & CCMM054-Amended Figure 3.3 These proposed modifications encompass CC-AM005 which can therefore be deleted to avoid duplication.

CC-MM140 Housing in multiple occupation (HMO)

Paragraph 6.22 of Policy 48 of the draft plan makes a requirement for a proposal for a change of use to a HMO to meet the criteria of the Lifetime Homes standard.

The Written Ministerial Statement dated 25 March 2015 (WMS) makes clear which particular standards can now be applied in respect of new dwellings and the Lifetime Homes standards are not included. A change of use which results in new/increased dwelling provision in the form of a HMO should not therefore be required to meet the Lifetime Homes standards.

We are therefore inviting the Council to reconsider the wording of the policy in this regard.

A consequential modification will require the definition of Lifetime Homes in the glossary to be deleted although this, by itself, would not give rise to a concern over soundness.

MM-CC168 We do not consider this modification to be necessary for soundness.

CC-MM183 We do not consider this modification to be necessary for soundness as it is a repeat of the first paragraph of the policy text as amended by CC-MM182.

CC-MM239 (potential harm "to" not "on")

Glossary We note that the "Code for Sustainable Homes" has been withdrawn so the definition can be deleted. However, we do not consider that this modification is necessary for soundness.

Next steps

We are inviting you to draft additional or amend the proposed modifications to address the issues set out above. We do not wish to see the full revised schedules again, just those modifications which are new or subject to significant change. Once these have been agreed by us, we are content for the Councils to prepare the schedule of proposed modifications for consultation and to carry out SA as necessary.

Please note that only those modifications which have not been subject to formal consultation already should be included. Where it is necessary to include text from previous modifications for clarity, it would be helpful to distinguish that in the text. We do not need to review the SA prior to consultation commencing. It will help to expedite the production of our reports if the Councils take a rigorous approach to accepting only those representations that relate to the advertised modifications.

Consultation should take place on the basis that the Inspectors have indicated that the proposed modifications may be necessary for soundness. Our final conclusions will be given in our reports.

We are not asking you to publish the email exchanges between yourselves and the Programme Officer relating to the proposed modifications as this can be considered to be 'work in progress'. However, these emails should be retained as they may be subject to FOI requests.

Sun 22 /10/17 22:30

From: Caroline Hunt

To: Programme Officer

Re: South Cambridgeshire LP - Proposed Main Modifications

Dear Gloria

Thank you for your emails of 20 October to both Councils.

As discussed briefly on Friday, having given initial consideration of the contents of those emails, I would like to seek clarification on a few points in view of the Inspector's imminent holiday so that the Councils can progress effectively without any delay or confusion.

The first point is seeking clarification from the Inspector whether the amendments to the Modifications schedules they have provided is a comprehensive list of all the amendments to the Councils' schedules that they consider may be necessary for soundness. We have assumed that this is the case given, for example, the comment on Policy E/2 of the SCLP that the Modification is not necessary for soundness but that this has no impact on the forthcoming consultation because it has already been consulted on. We therefore assume that the Inspectors have provided their views on the full schedule of proposed Modifications, including those that have already been subject to consultation.

Can I also seek clarification in relation to the Modifications provided by the Councils in my email of 15 October and Jonathan Dixon's email of 17 October in response to the Inspectors' request that we prepare proposed modifications in relation to an early review of the Local Plans and the boundary of the Sawston village framework to include the employment area to the south. We assume they should be included in the Proposed Modifications consultation in the form we provided. Please can the Inspector confirm if that is the case.

We initially had some reservations whether it was appropriate to limit consultation at this stage only to those Modifications that had not thus far been subject of formal consultation. We had not picked this up explicitly from the Inspectors during the hearings that consultations on potential main modifications would be so limited. However, having now reflected on the Inspector's proposed approach and discussed this with Douglas Edwards QC we appreciate and understand the Inspectors' approach in that, given there has already been formal consultation on the 2015 main modifications, consultation at this stage can properly be limited to main modifications other than those consulted on in 2015. We would however suggest that this distinction should be made clear in the forthcoming consultation documents and we will provide to the Inspectors a suggested form of wording for their approval in due course as part of our formal response to your emails.

As such, our understanding is that we should provide to the Inspectors the new and amended Modifications they have identified in their emails for their agreement as requested. We should then incorporate them into the full schedules (including those relating to early review of the Local Plans and to the Sawston framework), but that we should then remove those Modifications that were subject to consultation in 2015 in response to the Inspector's preliminary conclusions, so that we

only consult now on those Modifications that were not previously subject to consultation. We note that the Inspectors have said they do not need to see the full revised list, but we assume they will expect such a list following the Modifications consultation and we will therefore also maintain comprehensive lists.

I understand the Inspector is about to go on holiday, but I would appreciate it if she can help clarify the process so that we can move forward constructively while she is away.

Kind regards

Caroline

Caroline Hunt | Planning Policy Manager

Mon 23/10/2017 08:08

From: Programme Officer

To: Caroline Hunt

Re: South Cambridgeshire LP - Proposed Main Modifications

Dear Caroline

Thank you for your email below.

I shall update you as soon as I hear back from the Inspector.

Kind regards

Gloria

Gloria Alexander

Programme Officer

Mon 23/10/2017 16:19

From: Programme Officer

To: Caroline Hunt

Re: South Cambridgeshire LP - Proposed Main Modifications

Dear Caroline

I refer to your email below, responses to the queries raised follow.

Regarding the item described as your first point: the Inspectors have tried to provide a comprehensive list of amendments but they cannot, at this stage, rule out entirely the need to revisit issues as they progress with the writing of their reports.

Regarding the modifications provided by the Councils relating to an early review of the Local Plans, and those relating to Sawston/Pampisford village framework - the Inspectors would like those included in the consultation.

Regarding the scope of the forthcoming consultation, the Inspectors are content for an explanation to be provided in the consultation documents between those modifications being consulted upon at this time, and those already consulted upon in 2015. Please let me have a suggested form of wording for approval in due course.

I confirm that the Councils' understanding contained in your penultimate paragraph is correct.

Please let me know if there are any queries regarding the above.

Kind regards

Gloria

Gloria Alexander

Programme Officer

Sun 29/10/2017 22:41

From: Caroline Hunt

To: Programme Officer

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Attachments: Main Modifications – response to Inspectors email – 29.10.17.doc; Main Modifications – new or amended modifications.doc; Draft main mods consult doc v3.docx

Dear Gloria

Thank you for your emails of 20 October to both Councils in relation to the Main Modifications. This response is on behalf of both Councils.

The Councils have considered the Inspectors' requests and provide the response as set out in the attached document and related documents.

For your information, the Councils are aiming to undertake 6 weeks consultation running Wednesday 8 November to Wednesday 20 December, so to complete the consultation before the Christmas period and help move as swiftly as possible to the final stages of the examination process. A number of factors need to be set in train to enable the start of consultation on 8 November and it would be helpful if, once the Inspectors have had sight of the response, they could give an early indication of the likely timescale for their response, before we commit to that timetable.

I hope this email provides all the information the Inspectors require but please let me know if there is anything further they need or would find helpful.

Kind regards

Caroline

Caroline Hunt | Planning Policy Manager

Cambridge and South Cambridgeshire Local Plans – Main Modifications

Response to the Inspectors emails of 20 October 2017

This response is provided on behalf of both Councils in response to the emails to both Councils of 20 October in relation to Main Modifications. In reviewing the Inspectors' emails, the Councils are now providing the information requested by the Inspectors and have also identified a number of queries that require further clarification as set out below:

New or Amended Main Modifications

The Councils have prepared the new or amended Proposed Main Modifications that the Inspectors have identified in those emails may be necessary for soundness. As indicated by the Inspectors, only the new or amended Modifications are provided with this email for the Inspectors' consideration. Whilst a number of these require simple amendments to the schedules, in some cases the Inspectors have requested that the Councils draft wording for additional modifications, in particular related to *Five Year Housing Land Supply* and *Affordable Housing* for both plans, to *Gypsy and Traveller Policies* in South Cambridgeshire only, and *Housing in multiple occupation* in Cambridge. Please find draft modifications attached to this email.

Q. Please can the Inspectors confirm that these meet their requirements?

Draft Main Modifications Consultation Document introduction

The Councils have prepared a draft consultation document to which the full Modification schedules will be added – see attached. Please can the Inspectors confirm if they are content with the approach the Councils have taken to set the context for the consultation.

Two specific issues arise in relation to land south of Cambridge Biomedical Campus and land south of Fulbourn Road, which are highlighted in the consultation document and addressed below.

Q. Please can the Inspectors confirm if they are content with the draft consultation document?

Five-year housing land supply

With regard to five year housing land supply, we acknowledge the benefits of including within the Plans the methodology for calculating five year land supply and support inclusion of a definition to help assist at s78 inquiries. However, we are concerned about the inclusion of specific figures for either the five-year requirement or five-year supply in the Local Plans. Any figures included in the plan itself will be out of date almost immediately given the dynamic nature of exercise of calculating both supply and the on-going housing requirement.

The Councils are now preparing a new trajectory for their Annual Monitoring Reports, which will be published and agreed by Members in December 2017. The new AMR will provide a 5 year requirement and supply for the period 2017-2022. However from 1 April 2018 we will be in the 5 year period 2018-23. So the new AMR requirement and supply figures would both be out of date at around the time we hope to be in a position to adopt the plans. The AMR will include a figure for 2018-23 as well, based on predicted completions, but that would not be the figure included in the

plans. For these practical reasons, our preference would therefore be to include in the Plans a clear methodology, but not include data.

If the Inspectors nevertheless consider that further data is required to be included in the plan, whilst the new trajectory is not yet available, we are currently able to update completions data only to a 31 March 2017 date. This data has not previously been published and would otherwise be published in the AMR in December. If the Inspectors consider data should be included, it suggested that this should provide the five-year housing requirement only (calculated having regard to shortfall and using the Liverpool basis, with a 20% buffer added), rather than also including supply forecasts, for the reasons stated above. An express proviso would need to be included to make clear that the matter will be reviewed and revised, with up dated information, in the annual monitoring process, in accordance with the methodology set out in the plan.

A third option, and our least preferred, would be to include information of 5 year requirement and supply as suggested by the Inspectors. If this is selected, the Councils suggest referring in the modifications at this stage to figures being inserted based on the latest AMR at the time of adoption (or in the Inspectors' Report), in recognition that the new AMR will be published in December. In addition to the misgivings which we have set out above, we however, have concerns that the option of including 5 year supply figures (as opposed to requirement) would give rise to an additional and serious risk that objections could be made in response to the consultation to the effect that the supply calculation relies on untested housing trajectories in the AMRs (and if from the 2017 AMRs, it would be unpublished until towards the end of the Mods consultation) such that if supply figures were to be included in the local plans there should first be a further hearing to test the assumptions underlying the supply figures. It is also of relevance to note that the Councils consulted on modifications in 2015 to remove the housing trajectories from the local plans in recognition that they had already become out of date and that it is preferable to look to the AMR for up to date information at any point in the plan period.

In view of all the above points, our preference would be to include in the Plans a clear methodology, but not include data. We hope that the Inspectors consider that this approach would achieve their objective. The Councils' preferred approach is set out in the attached schedule of new and amended Modifications.

Q. Please can the Inspectors advise which of these approaches they are requesting is consulted on?

Land South of Cambridge Biomedical Campus (CBC)

SCDC consulted in 2015 on what was described as a 'Provisional Modification', explaining that 'a decision whether to propose a modification to the Inspector will be dependent on the outcome of further investigations of the surface water flooding issue including discussions with the landowner, and whether those investigations show that the surface water flooding issues can be satisfactorily addressed'. Following consultation a decision on the provisional allocation was deferred to allow time for additional evidence to be gathered to address surface water flood risk, groundwater hydrology (including flow and quality), biodiversity and scope for mitigation and enhancement and

transport impacts. The principle of the proposed modification was confirmed by the Council in their Further Proposed Modifications of November 2016, following consideration of the further evidence, with additional changes to the proposed policy. The Council considers that these additional changes will need to be consulted upon at this stage in any event as they were not the subject of the consultation, on a provisional basis, in 2015.

The issue that arises is therefore as to whether the part of the policy and supporting text consulted on in 2015 should be excluded from the forthcoming consultation. The Council, having discussed with Douglas Edwards QC, considers that this proposed modification should be consulted on in full in the forthcoming consultation, to ensure all interested parties have had a full opportunity to comment on the proposed modification with the benefit of the evidence that was completed following the 2015 consultation, even though it was considered in full at the hearing. The Council is concerned first that the evidence base in support of the modified policy has been supplemented since the 2015 consultation but also that that consultation expressed the proposed modification as provisional. It is possible therefore that some individuals may not have participated in that consultation process given its "provisional" nature of the proposed modification. The Council is concerned that, were it to do otherwise, there is a possibility of a contention of unfairness and/or legal challenge. It would however be appropriate, as part of the consultation, to include a statement that those who made representations previously need not repeat any representations made in response to the 2015 consultation or at the examination hearing earlier this year. Draft wording is provided in the draft consultation document attached to this email at paragraph 1.5.

The additional sentence identified by the Inspectors in their email in relation to the access to the site would also be added to the Council's proposed Modification, which would be retained in the schedule for consultation. The Modification is not included in the list of new and amended Modifications but can be provided if the Inspectors would find that helpful.

Q. Please can the Inspectors advise how they wish us to proceed?

Land South of Fulbourn Road

The Inspectors' email advises that SCDC's proposed Modification to the boundary of the employment allocation south of Fulbourn Road (Policy E/2), consulted on in 2015, is not necessary for the soundness of the plan. This indicates that the allocation would therefore remain as in the submitted South Cambridgeshire Local Plan. The Council recognises that to be consistent with the Inspectors' requested approach to the 2015 Modifications consultation, no mention would be made of the E/2 point. However, in our view it would seem a little odd not to do so, and the objectors, CEG, may be surprised, with some justification in our view, not to be informed of it, not least since the Inspectors are clear that their email would be FOL(able). It seems to the Council that there are that there should be some recognition of preliminary findings on Policy E/2. We have identified two options:

- Include reference in the consultation report (see para 1.6)
- Write under separate cover to NLP (on behalf of CEG) to inform them of the indication given.

Q. Please can the Inspectors advise how they wish us to proceed?

Reference to relevant background evidence

The Councils proposed modifications, and therefore we think most likely the Inspectors' consideration of them, have been informed by new evidence prepared during the examination process. We therefore consider that we should include in the Proposed Modifications consultation a list of the principal evidence documents that informed them, so that those responding to the consultation have the benefit of that evidence. This would reflect and secure consistency with the approach taken at proposed submission consultation in 2013 and the Modifications consultation in response to the Inspectors' preliminary conclusions in 2015. This would relate to a range of evidence documents including for example those informing the land south of CBC employment allocation, the Gypsy and Traveller Needs Assessment, and the Local Green Spaces evidence (see list at Appendix A of the consultation document).

Q. Please can the Inspectors advise if the attached list should be included in the consultation document?

Affordable Housing

With regard to Affordable Housing, the Inspectors' letter to Cambridge included reference to the Central Lincolnshire as an example. This paragraph was not included in the South Cambridgeshire Letter.

Q. Are we correct to assume this example applies to both plans?

Cambourne West

When providing the schedule of Proposed Modifications the Council raised a question about the approach to be taken to the Cambourne West policy. The Council resolved to grant planning permission for a larger site, extending to Caxton Gibbet, in January 2017. Currently the modification schedule includes a number of minor changes to the existing policy.

Q. Could the Inspectors confirm that this is how they wish to proceed?

South Cambridgeshire Policies Map

SC-MM325 (add bullet point above the existing bullet point to read: Glebe Land (NH/12-098a)

Area 098b (as shown on the map accompanying the modifications schedule) was included on the Submitted Policies Map 2014 as a LGS, and it proposed now to become PVAA. Area 098a is already shown as PVAA on the Submitted Policies Map 2014, therefore maintaining this area as a PVAA does not require a modification. The Linton Map provided with the modification should not have included reference to 098a for this reason, and this should have been picked up by the Council when the errata was sent in August.

Following this clarification could the inspectors' confirm that this addition is not therefore not required?

SC-MM339 (a-c) (d-delete "land to the north of Bannold Road" and replace with "Barracks Frontage NH/12-167")

Waterbeach – Barracks Frontage (NH/12-167) is proposed to no longer be LGS, but this is actioned by SC-MM299c. This is because it is shown on the Waterbeach New Town Map (inset H), not the Waterbeach village inset.

SC-MM339d refers to 'Delete the Green Belt designation from land to the north of Bannold Road.' This is not a local Green Space, but refers to the proposed Green Belt Extension that was identified on the submitted proposals map. The majority of this land now has planning permission for development and the Modification SC-MM339d is necessary to remove the Green Belt designation from this area, consistent with Modification SC-MM006 to Policy SS/5.

Q. Could the Inspectors please clarify their intention regarding this modification?

SC-MM340 (reinstate the modification; change the site reference to "Newton Road Play Area NH12-171")

The Council acknowledges that the intention is not designate this area LGS. During the Local Green Space review it came to our attention that the site was included in the review as an error. The site should not have been reviewed at all, as it is already in the Green Belt and was NOT included on the Submission Policies Map 2014 as LGS (this was set out in RD/CR/801). The Council's errata to the mods schedule in August proposed its removal from the schedule for this reason.

Q. Following this clarification could the inspectors' confirm that this addition is not therefore not required (i.e. no modification is required)?

South Cambridgeshire Other Minor Issues

SC-MM024 - After Para 2.51a – Council suggested text may be better moved to After Para 2.50 instead.

Q. Please can the Inspectors confirm if they are content with this approach?

Deletion of change to boundary of Policy E/2 Fulbourn Road – along with the deletion of SCMM214, SCMM215 and SCMM314, there is also a consequential change to SCMM020 (third bullet), where the amendment to figure 2 (Key Diagram) to reflect the amended allocation would no longer be required. This is assumed to be for the full schedule in due course but for completeness now.

Q. For the Inspectors to note.

SC-MM151, SC-MM225, SC-MM230 - The Inspectors indicate that they do not consider that these modifications are necessary for soundness.

Q. Are the inspectors therefore content that they can be made as additional modifications?

MM230 is a policy change?

Cambridge – Draft Text in Response to Inspectors’ Letter

Mod Ref.	Local Plan Page	Policy/ Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
		Chapter 2:			
CC-MM012		Policy 3: Spatial strategy for the location of residential development	<p><i>Amend second paragraph of Policy 3 to read:</i></p> <p>Provision will be made for the development of not less than 14,000 additional dwellings within Cambridge City Council’s administrative boundary over the period from April 2011 to March 2031 to meet the objectively assessed need for homes in Cambridge. This will enable continuous delivery of housing for at least 15 years from the anticipated date of adoption of this local plan. <u>Provision includes two small sites to be released from the Cambridge Green Belt at Worts’ Causeway, which will deliver up to 430 dwellings. The housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management decisions that concern housing development. This p</u>Provision includes two small sites to be released from the Cambridge Green Belt at Worts’ Causeway, which will deliver up to 430 dwellings. The five year housing land supply will be calculated using the Liverpool methodology and a 20% buffer</p>	<p>The insertion of text in relation to the five year housing land supply was suggested to ensure conformity with the November 2014 Written Ministerial Statement as amended in March 2015.</p> <p>Sentence related to land at Worts’ Causeway has been moved for clarity.</p>	<p>No</p> <p>Draft changes in Response to Inspectors’ Letter is highlighted in yellow</p>
			Add new paragraph after 2.45		Draft changes in

			<p>The Councils have a record of providing significant levels of housing and have a significant level of identified housing supply. The development strategy for Cambridge and South Cambridgeshire has been carried forward from previous plans, and includes two further new settlements. Under these circumstances the appropriate methodology for calculating five year housing land supply across the two authorities is the Liverpool methodology. In response to historic levels of delivery, the appropriate buffer is 20%.</p>		Response to Inspectors' Letter is highlighted in yellow				
CC-MM018	26	After Paragraph 2.48	<p><i>Add new paragraphs after paragraph 2.48 to read:</i></p> <p>Calculating Five Year Housing Land Supply Five-year housing land supply will be calculated using the Liverpool methodology, which spreads any shortfall within the plan period over the remainder of the plan period. A 20% buffer is also included in response to historic levels of delivery.</p> <p>The 'Liverpool' methodology to be used for calculating the five-year housing land supply is set out in the table below:</p> <table border="1"> <tr> <th colspan="2">'Liverpool' Methodology</th> </tr> <tr> <td>(a) Housing requirement in the</td> <td>Net number of new homes required in the plan</td> </tr> </table>	'Liverpool' Methodology		(a) Housing requirement in the	Net number of new homes required in the plan	<p>The insertion of text in relation to the five year housing land supply was suggested to ensure conformity with the November 2014 Written Ministerial Statement as amended in March 2015.</p>	Draft changes in Response to Inspectors' Letter is highlighted in yellow
'Liverpool' Methodology									
(a) Housing requirement in the	Net number of new homes required in the plan								

			plan period	period (2011 to 2031) as set out in Policy S/5 of the South Cambridgeshire Local Plan and Policy 3 of the Cambridge Local Plan		
			(b) Completions so far in the plan period	Net number of new homes completed so far in the plan period, as set out in the Annual Monitoring Report.		
			(c) Number of dwellings left to deliver in the plan period (= a - b)	Calculated by subtracting the net number of homes completed so far in the plan period from the housing requirement.		
			(d) Number of years of plan period left	Number of years of the plan period left in which to deliver the housing requirement.		
			(e) Annualised average requirement for the remainder of the plan period (= c ÷ d)	Calculated by dividing the number of dwellings left to deliver by the number of years of the plan period left.		
			(f) Five year supply requirement (= e x 5)	The requirement to meet in the next five year period. Calculated by multiplying the annualised average requirement by five.		
			(g) 20% buffer to be added to the five year supply requirement (= f x 0.2)	A 20% buffer in addition to the five year supply requirement should be added in response to historic levels of delivery		

			<p>(h) Five year supply requirement with 20% buffer (= f + g)</p> <p>(i) Number of dwellings predicted to be completed in the five year period</p> <p>(j) Five year supply (= i ÷ h x 5)</p>	<p>Five year supply requirement plus 20% buffer, against which predicted housing supply is assessed.</p> <p>Net number of new homes predicted to be completed in the five year period, as set out in the housing trajectory published in the Annual Monitoring Report.</p> <p>Calculated by dividing the number of dwellings predicted to be completed in the five year period by the five year supply requirement with the 20% buffer, and then multiplying by five.</p>		
			<p>The Councils' five year supply will be published each year in the Councils' Annual Monitoring Reports.</p>			
		Chapter 6:				
CC-MM130	147 & 148	Policy 45: Affordable housing and dwelling mix	<p><i>Amend the first paragraph and following text of Policy 45 to read:</i></p> <p>Planning permission will only be granted for residential development on sites with capacity for between 2 and 9 dwellings, if provision is made for a minimum of 10 per</p>	<p>The deletion of previous modifications have not been included.</p> <p>Modification PM/CC/6/A in Cambridge Local Plan</p>	Yes (Not all text)	Draft changes in Response to

		<p>cent affordable housing. On such sites, financial contributions towards affordable housing off-site are considered acceptable. This does not prohibit on-site provision of affordable housing on sites of this scale, but recognises that circumstances may often not allow for delivery on-site.</p> <p>Planning permission will only be granted for residential development on sites with capacity for between 10 and 14 dwellings or on sites of between 0.3 and 0.49 hectares, if provision is made for a minimum of 25 per cent affordable housing on-site.</p> <p>Furthermore, planning permission will only be granted for residential development on sites with capacity for 15 dwellings or more or on sites of 0.5 hectares or more, if provision is made for a minimum of 40 per cent affordable housing on-site.</p> <p><u>Planning permission will only be granted for residential development on sites where the minimum percentage of affordable housing has been secured on site in line with the thresholds and percentages set out in the table below:</u></p> <table border="1" data-bbox="600 1007 1131 1246"> <thead> <tr> <th><u>No. of dwellings</u></th> <th><u>Minimum percentage of affordable housing required</u></th> </tr> </thead> <tbody> <tr> <td><u>11-14 units</u></td> <td><u>25%</u></td> </tr> <tr> <td><u>15 or more units</u></td> <td><u>40%</u></td> </tr> </tbody> </table>	<u>No. of dwellings</u>	<u>Minimum percentage of affordable housing required</u>	<u>11-14 units</u>	<u>25%</u>	<u>15 or more units</u>	<u>40%</u>	<p>Proposed Modifications (March 2016) (RD/MC/140)</p> <p>Part of this modification was suggested for clarity and was proposed as PM/6/001 as part of the Addendum to the Cambridge Local Plan 2014: Proposed Submission document (July 2013) – Schedule of Proposed Changes following Proposed Submission Consultation (RD/Sub/C/050).</p> <p>This indicates that Starter Homes Exceptions Sites are not expected to deliver affordable housing in accordance with the 2 March 2015 Written Ministerial Statement on Starter Homes. This modification is therefore required to ensure that the plan is consistent with changes to national planning policy.</p> <p>The affordable housing thresholds modification was suggested to ensure</p>	<p>Inspectors' Letter is highlighted in yellow</p>
<u>No. of dwellings</u>	<u>Minimum percentage of affordable housing required</u>									
<u>11-14 units</u>	<u>25%</u>									
<u>15 or more units</u>	<u>40%</u>									

		<p>Where it appears that a larger site has been subdivided into smaller development parcels in order to circumvent the requirements of this policy, or for any other reason, the threshold and the <u>pro-rata</u> percentage of affordable housing sought will apply to the <u>requirement from the larger area as a whole</u>. The required density on a given site will need to have regard to its wider context and other policies of this plan. All Developments of 11 dwellings or more, or on sites of less than 11 units if the combined gross internal floorspace of the proposed development exceeds 1,000 sqm will provide affordable housing.</p> <p>The occupation of affordable housing will be limited to people in housing need and shall be available in perpetuity. Affordable housing shall be provided on development sites with the capacity of 11 dwellings or more in accordance with the percentages and thresholds set out above unless exceptional circumstances are demonstrated. Where affordable housing is provided, it shall be of tenure blind design indiscernible from and well integrated with the general market housing.</p> <p>Developments should include a balanced mix of dwelling sizes*, types and tenures to meet projected future household needs within Cambridge. The mix of dwellings and tenure types shall have regard to the differing needs for different unit sizes of affordable housing and market housing. and to the council's Affordable Housing Supplementary Planning Document in force at the time planning permission is applied for.</p> <p>All sites** including employment related housing will be</p>	<p>conformity with the November 2014 Written Ministerial Statement as amended in March 2015 on Affordable Housing Thresholds.</p>	
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			<p>required to make affordable housing provision in line with the thresholds <u>and percentages</u> set out above.</p> <p><u>Further details on the practical implementation of this policy will be set out in an up to date Affordable Housing Supplementary Planning Document.</u></p> <p>*Measured by the number of bedrooms to be provided in each dwelling.</p> <p>** Except for Starter Homes Exception Sites</p>		
CC130b		Paragraph 6.4	<p><i>Amend paragraph 6.4 to read:</i></p> <p>As much of the city's housing supply is delivered on small sites, it is important that these sites contribute to the provision of affordable housing, subject to viability and the effective management of housing by Registered Providers. The council's Small Sites Affordable Housing Viability Study (2013) showed that most small sites providing between 2 and 9 homes are capable of making a financial contribution towards the provision of affordable housing elsewhere. Most sites in Cambridge with the capacity to deliver between 110 and 14 residential units can deliver 25 per cent affordable housing whilst remaining viable, whilst most schemes containing 15 or more residential units remain viable with 40 per cent affordable housing.³³ In instances where higher levels of affordable housing than the percentages set out in the policy are proposed, this is supported by the council as it will contribute to meeting affordable housing need. Where a developer considers that meeting the affordable housing target percentage will be unviable, robust evidence of this</p>	The affordable housing thresholds modification was suggested to ensure conformity with the November 2014 Written Ministerial Statement as amended in March 2015 on Affordable Housing Thresholds.	No Draft changes in Response to Inspectors' Letter is highlighted in yellow

			must be provided in the form of an independent viability appraisal. Negotiations between the council and the developer will need to take place to ensure clarity about the particular circumstances which have given rise to the development's reduced viability or non-viability, either on an open book valuation or involving an independently commissioned assessment using the Homes and Communities Agency's Development Appraisal Tool ³⁴ or other equivalent tools agreed with the council in advance of assessment.		
CC-MM132	149	Paragraph 6.6	<p><i>Amend paragraph 6.5 to read:</i></p> <p>On smaller sites delivering under 10 units, financial contributions will be the standard approach in supporting the delivery of affordable housing. On larger sites delivering 110 units or more, developers will be expected to deliver whole units on site with financial contributions sought for fractions of units. Note that a vacant building credit may apply to developments bringing vacant buildings on site back into lawful use or where such buildings are demolished as part of a development. If a vacant building credit is allowed the effect would be to reduce the expected affordable housing contribution from a site.</p>	The affordable housing thresholds modification was suggested to ensure conformity with the November 2014 Written Ministerial Statement as amended in March 2015 on Affordable Housing Thresholds.	No Draft changes in Response to Inspectors' Letter is highlighted in yellow
CC-MM140	155	Paragraph 6.22	<p><i>Amend paragraph 6.22 to read:</i></p> <p>It is also important to ensure that HMOs provide a standard of accommodation equivalent to that enjoyed by other residents and that the amount of activity generated by the proposed level of occupation does not detract from the amenities of neighbouring occupiers.</p>	<p>The deletion of previous modifications have not been included.</p> <p>Modification PM/CC/6/C in the Cambridge Local Plan Proposed Modifications</p>	Yes (Not current amendments) Draft changes in Response to

		<p>The criteria for Lifetime Homes will therefore be applied to proposals for change of use to HMOs, and minimum space standards for development should also be aspired to in the provision of new HMOs. Policy 51: Accessible Homes and Policy 50: Residential Space Standards will therefore be aspired to for proposals of change of use to HMOs and should also be applied to the provision of new HMOs. The application of the space standards will help to determine the number of occupiers that a property can reasonably accommodate as a HMO. This not only ensures reasonable living conditions for occupiers, but will also ensure that the intensification of such activity associated with any HMO is proportionate to the size of the property.</p>	<p>(March 2016) (RD/MC/140). Justification for this modification can be found in RD/MC/140.</p>	<p>Inspectors' Letter is highlighted in yellow</p>
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South Cambridgeshire – Draft Text in Response to Inspectors' Letter

Mod Ref.	Local Plan Page	Policy / Paragraph	Proposed Modification	Reason	Has it been subject to consultation?
SC-MM027	36	Policy S/12: Phasing, Delivery and Monitoring	<p>Amend Policy S/12 to read:</p> <p>'1. The Local Plan aims to achieve a continuous high level of housing production throughout the plan period to support predicted and actual jobs growth. The housing trajectories for Cambridge and South Cambridgeshire, as updated each year in the Annual Monitoring Report, will be considered together for the purposes of phasing of housing delivery, including for calculating 5-year housing land supply in development management</p>	<p>Source: This modification was published in South Cambridgeshire Local Plan Proposed Modifications (RD/MC/150) as PM/SC/2/R.</p> <p>Draft changes in Response to Inspectors' Letter is highlighted in yellow</p>	<p>Yes, in Proposed Modifications Joint Consultation Report (December 2015) (RD/MC/010) as PM/SC/2/R</p> <p>Draft changes in Response to</p>

			<p>decisions that concern housing development. Five-year housing land supply will be calculated using the Liverpool Method and a buffer of 20%. Housing sites are not deliberately phased, with the exception of:</p> <ul style="list-style-type: none"> a. New town at Waterbeach Barracks — to start delivering housing in 2026, unless otherwise determined through a review of the Local Plan; b. New village at Bourn Airfield — to not start delivering housing before 2022, unless an undersupply of housing earlier in the plan period is demonstrated such that it needs to come forward earlier, including to provide an adequate 5 year housing land supply. <p>2. The Council will provide a 5% buffer as part of its 5-year housing land supply, met mainly through windfalls.</p>		<p>Inspectors' Letter is highlighted in yellow</p>
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SC-MMxxx	31	Paragraph 2.63	<p>Amend paragraph 2.63 to read:</p> <p>The Councils has have a record of providing significant levels of housing and has have a significant level of identified housing supply. The Council has also continued to maintain up to date development plans. The development strategy in the Local Development Framework 1999-2016 was always expected to deliver fewer than the annualised average number of homes in the first part of its plan period, with higher than the annualised figure in the later years once the major developments come forward, taking account of their longer lead-in periods. <u>The development strategy for Cambridge and South Cambridgeshire has been carried forward from previous plans, and includes two further new settlements.</u> That was beginning to occur when the recession hit in 2008 and progress on the major sites stalled temporarily. The severe slow down in the house building industry had the effect that in recent years the Council has not had could not demonstrate a 5 year land supply against the Core Strategy 2007 target, particularly impacted by the reducing amount of the plan period to 2016 remaining. Under these circumstances the</p>	In response to Inspectors' letter 20 October 2017	No Draft changes in Response to Inspectors' Letter is highlighted in yellow

			<p>appropriate methodology for calculating five year housing land supply across the two authorities is the Liverpool methodology.</p> <p>Council considers that the normal 5% buffer is the appropriate buffer for the South Cambridgeshire Local Plan with an end date of 2031. In response to historic levels of delivery, the appropriate buffer is 20%.</p>		
SC-MM030	38	Paragraph 2.64	<p>Delete paragraph 2.64:</p> <p>'A 5-year supply of housing land, on the basis of the average annual figure of 950 homes required to meet the 19,000 housing requirement, is 4,750 homes. A 5% buffer would therefore be 238 homes capable of being brought forward from later in the plan period if needed.'</p>	In response to Inspectors' letter 20 October 2017	No Draft changes in Response to Inspectors' Letter is highlighted in yellow
SC-MMxxx	40	Paragraph 2.67	<p>Delete paragraph 2.67:</p> <p>'The housing trajectory shows that delivery above the annualised average is anticipated for the early years of the Plan that more than compensate for delivery below the annualised average in the middle years. Any slippage in the early years provision would smooth out the overall rate of delivery. This is without including any allowance for windfalls, which provide greater reassurance that delivery rates will be achieved.'</p>	In response to Inspectors' letter 20 October 2017	No Draft changes in Response to Inspectors' Letter is highlighted in yellow
SC-MMxxx	40	After paragraph 2.67	<p>Insert the following text after paragraph 2.67:</p> <p>'Calculating Five Year Housing Land Supply</p> <p>Five-year housing land supply will be</p>	In response to Inspectors' letter 20 October 2017	No Draft changes in Response to Inspectors' Letter is highlighted in

		<p>calculated using the Liverpool methodology, which spreads any shortfall within the plan period over the remainder of the plan period. A 20% buffer is also included in response to historic levels of delivery.</p> <p>The 'Liverpool' methodology to be used for calculating the five-year housing land supply is set out in the table below:</p> <table border="1"> <tr> <th colspan="2">'Liverpool' Methodology</th> </tr> <tr> <td>(a) Housing requirement in the plan period</td> <td>Net number of new homes required in the plan period (2011 to 2031) as set out in Policy S/5 of the South Cambridgeshire Local Plan and Policy 3 of the Cambridge Local Plan.</td> </tr> <tr> <td>(b) Completions so far in the plan period</td> <td>Net number of new homes completed so far in the plan period, as set out in the Annual Monitoring Report.</td> </tr> <tr> <td>(c) Number of dwellings left to deliver in the plan period (= a - b)</td> <td>Calculated by subtracting the net number of homes completed so far in the plan period from the housing requirement.</td> </tr> <tr> <td>(d) Number of years of plan</td> <td>Number of years of the plan period left in</td> </tr> </table>	'Liverpool' Methodology		(a) Housing requirement in the plan period	Net number of new homes required in the plan period (2011 to 2031) as set out in Policy S/5 of the South Cambridgeshire Local Plan and Policy 3 of the Cambridge Local Plan.	(b) Completions so far in the plan period	Net number of new homes completed so far in the plan period, as set out in the Annual Monitoring Report.	(c) Number of dwellings left to deliver in the plan period (= a - b)	Calculated by subtracting the net number of homes completed so far in the plan period from the housing requirement.	(d) Number of years of plan	Number of years of the plan period left in	yellow
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(d) Number of years of plan	Number of years of the plan period left in												

			period left	which to deliver the housing requirement.		
			(e) Annualised average requirement for the remainder of the plan period (= c ÷ d)	Calculated by dividing the number of dwellings left to deliver by the number of years of the plan period left.		
			(f) Five year supply requirement (= e x 5)	The requirement to meet in the next five year period. Calculated by multiplying the annualised average requirement by five.		
			(g) 20% buffer to be added to the five year supply requirement (= f x 0.2)	A 20% buffer in addition to the five year supply requirement should be added in response to historic levels of delivery		
			(h) Five year supply requirement with 20% buffer (= f + g)	Five year supply requirement plus 20% buffer, against which predicted housing supply is assessed.		
			(i) Number of dwellings predicted to be completed in the five year period	Net number of new homes predicted to be completed in the five year period, as set out in the housing trajectory published in the Annual Monitoring Report.		

			<p>(j) Five year supply (= i ÷ h x 5)</p> <p>Calculated by dividing the number of dwellings predicted to be completed in the five year period by the five year supply requirement with the 20% buffer, and then multiplying by five.</p> <p>The Councils' five year supply will be published each year in the Councils' Annual Monitoring Reports.</p>		
SC-MM192	141	Policy H/9: Affordable Housing	<p>Delete the word 'net' from line one of Policy H/9 as follows:</p> <p>1. 'All developments which increase the net number of homes on a site by 3 or more will provide affordable housing as follows:'</p> <p>Amend criterion 1 of Policy H/9 to read:</p> <p>1. All developments which increase the net number of homes on a site by 3 of 11 dwellings or more, or on development sites of less than 11 units if the total floorspace of the proposed units exceeds 1,000 sqm, will provide affordable housing as follows:'</p>	<p>In response to Inspectors' letter 20 October 2017. Supersedes earlier version.</p> <p>Source: This modification was published in Appendix 2 of the Council's Matter SC5B Statement.</p> <p>Modification provides flexibility and clarification. The wording of the policy is incompatible with vacant building credit (VBC). Policy H/9 only applies to a net increase in the number of dwellings on a site, effectively discounting existing on-site residential dwellings to encourage the recycling and reuse of land. The vacant building credit has much the same intention. Under VBC where a vacant building is brought back into use, or is demolished to be replaced by a new building, the developer should be</p>	<p>No</p> <p>Draft changes in Response to Inspectors' Letter is highlighted in yellow</p>

				offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Retention of the policy discount in Policy H/9 alongside VBC will at the best lead to a lack of clarity as to how the policy should be applied and at worst could lead to claims that both discounts should apply.	
SC-MMxxx	142	Paragraph 7.35	Amend paragraph 7.35 to read: ‘The Council has previously operated a threshold of 2 properties, but it has raised this threshold to 3 has been raised in line with the Written Ministerial Statement of 28 November 2014, to encourage more very small scale developments to come forward development on smaller brownfield sites and to help diversify the house building sector by providing a boost to small and medium sized developers. Affordable homes should be integrated with market homes in small groups or clusters to create sustainable, inclusive and mixed communities. Note that a vacant building credit may apply to developments bringing vacant buildings on site back into lawful use or where such buildings are demolished as part of a development. If a vacant building credit is allowed the effect would be to reduce the expected affordable housing contribution from a site.	In response to Inspectors’ letter 20 October 2017.	No Draft changes in Response to Inspectors’ Letter is highlighted in yellow
SC-MM201	156	After Paragraph 7.65	Add new Paragraph 7.65a:	In response to Inspectors’ letter 20 October 2017. In addition to earlier	No

			<p>In respect of those Gypsies and Travellers or Travelling Showpeople who do not lead a nomadic lifestyle according to the planning definition, South Cambridgeshire will continue to assess and plan to meet their needs, as part of its wider responsibilities to plan to meet the accommodation needs of its settled community. <u>The Housing Act 1985 (as amended by the Housing and Planning Act 2016) includes a requirement to consider the needs of people residing in or resorting to the District with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Policy S/13 includes a commitment to consider the implications of an assessment, including whether any site allocations should be made to meet any need identified, working with the local housing authority, through an early review of the Local Plan.</u></p>	<p>version.</p> <p>Source: This modification was published in the Further Proposed Modifications to the South Cambridgeshire Local Plan (November 2016) (RD/FM/010)</p> <p>Consistent with national policy Modification to reflect changes to the Government's Planning Policy for Travellers in August 2015.</p>	<p>Draft changes in Response to Inspectors' Letter is highlighted in yellow</p>
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DRAFT CONSULTATION DOCUMENT

Cambridge Local Plan and South Cambridgeshire Local Plan Main Modifications Consultation Report – November 2017

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1 Introduction

Purpose

- 1.1 Following the completion of examination hearings into the Cambridge Local Plan and South Cambridgeshire Local Plan in July 2017, the plans have reached the next key stage in the process. Having considered the representations and the evidence received and presented through the examination hearings, the Inspectors have now asked that consultation be carried out on the Main Modifications they consider may be necessary in order for the Local Plans to be found 'sound'. The Inspectors' final conclusions will be given in their Reports in due course.
- 1.2 The Main Modifications include the majority of the modifications that the Councils have put forward during the examination process, with a limited number of further or amended changes identified by the Inspectors. The Modifications do not change the amount of development or broad strategy for development included in the Local Plans, or the main locations for where this development will be delivered. However, there are a number of modifications that refine the Plans, including in relation to a number of sites, and reflect changes in circumstances since the Plans were submitted for examination, and these are summarised in chapter 3.
- 1.3 The public consultation on the Main Modifications provides the opportunity to comment only on the specific changes contained in the main modifications. It does not offer an opportunity to reopen the debate on other matters. The consultation does not concern those parts of the Local Plans where Modifications are not proposed. Comments received that do not relate to a Main Modification will be outside the scope of the consultation and will be not be registered.
- 1.4 This consultation also does not include those Modifications that were the subject of formal consultation in 2015 in response to the Inspectors' preliminary findings. The Inspectors have already considered comments made to the consultation on the 2015 Modifications during the examination process, and are expected to address those 2015 Modifications, to the extent necessary, in their final report. There are two specific issues to raise in this regard.
- 1.5 The only 2015 Modification included in the current consultation is the proposed extension to the Cambridge Biomedical Campus. This is included because it was described in the 2015 consultation as a 'Provisional Modification' dependent on the outcome of further technical investigations and a decision to put forward the site as a Modification was made by South Cambridgeshire District Council in November 2016 informed by a range of further evidence. It is therefore appropriate to include it in this consultation to ensure that there has been a fair opportunity for comments to be made on the proposed Modification, having regard to the evidence supporting it. Please note that those who made representations previously need not repeat any representations made in response to the 2015 consultation or at the examination hearing held in 2017.
- 1.6 The Inspectors have informed South Cambridgeshire District Council already that they do not consider Modification xxx, which concerns Policy E/2 Land south of Fulbourn Road of the Submitted South Cambridgeshire Local Plan, and which was consulted on in 2015, to be necessary for soundness, and therefore this modification is unlikely to be adopted. The boundaries of the allocation in Policy E/2 would therefore remain as in the submitted Local Plan.

Comment [HC1]: This issue is addressed in the Councils email responding to the Inspectors.

It seems to the Councils that it should be made clear in the consultation document why this 2015 Mod is being included in this consultation, if the Inspector agrees that is appropriate.

Please can the Inspectors advise whether the inclusion of para 1.5 is an appropriate way of dealing with this issue?

Comment [HC2]: This issue is addressed in the Councils email responding to the Inspectors.

It seems to the Councils that there should be some response to their preliminary findings on Policy E/2. We have identified two options:

1. Include para 1.6
2. Write under separate cover to NLP (on behalf of CEG) to inform them of the indication given.

Please can the Inspector advise how she wishes to proceed?

- 1.7 The consultation runs from **9am Wednesday 8 November to 5pm Wednesday 20 December 2017.**

Background

- 1.8 The Councils submitted the Cambridge Local Plan and South Cambridgeshire Local Plan for examination on 28 March 2014. The separate plans were prepared in parallel, with a high level of joint working throughout the process, and they provide a joint development strategy across the two areas. This reflects the close functional relationship between the two areas and responds to the duty to cooperate.
- 1.9 The examination process is being carried out by independent planning inspectors appointed by the Secretary of State to determine whether the Local Plans are 'sound' and have complied with the 'legal requirements' set out in the National Planning Policy Framework.¹
- 1.10 A number of joint examination hearings on strategic issues were held between November 2014 and April 2015, including housing and employment needs, the spatial development strategy, Green Belt, transport, infrastructure and housing supply. Following the hearings the Inspectors wrote to the Councils on [20 May 2015](#) in relation to three main issues (Objectively Assessed Need for new housing, Overall Development Strategy, and Conformity with revisions to National Planning Policy since the Local Plans were submitted for examination) and invited the Councils to undertake additional work to address those issues before the examinations could progress further.
- 1.11 The examinations were formally suspended between July 2015 and March 2016 whilst the Councils undertook this additional work and consulted on a number of Proposed Modifications to the two Local Plans, in December 2015. The Councils formally submitted Proposed Modifications to each Local Plan to the Inspectors (March 2016) and the hearings resumed; initially some further joint sessions were held into matters raised in the 2015 Proposed Modifications, before the Inspectors considered in turn issues relating to the Cambridge Local Plan and then the South Cambridgeshire Local Plan. South Cambridgeshire District Council submitted Further Proposed Modifications to the Inspectors in November 2016, and Cambridge City Council submitted Further Proposed Modifications in January 2017, to address matters arising during the resumed hearing sessions.
- 1.12 The final planned hearing took place in July 2017. The Inspectors have formally closed the hearings and have considered all the written and verbal evidence received from participants and the modifications the Councils have proposed during the examination process.
- 1.13 The Inspectors have now identified the Main Modifications that they consider may be necessary to ensure the Local Plans can be found 'sound' and adopted.

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf (see paragraph 128)

2. How to have your say

What is this consultation about?

- 2.1 The Councils are consulting on the Main Modifications identified by the Inspectors as those which may be necessary to ensure the plans can be found 'sound' and adopted. Main Modifications are those that materially affect the policies in the submitted Local Plans. As such they must be consulted upon to enable the changes proposed to be made in the final plans. These are set out in **Chapters 4 and 6** of this document.
- 2.2 At the same time, the Councils are taking the opportunity to publish some Additional (minor) Modifications. These minor modifications do not impact on the intent or interpretation of the policies of the plans or go to the heart of whether a plan is 'sound' or not. They consist of changes such as typographical errors and factual updates. They do not formally form part of this consultation but are provided for completeness. See **Chapters 5 and 7** of this document.
- 2.3 If you wish to see any of the proposed Modifications in their wider context, please read them alongside the submitted Local Plans, which can be viewed on the Councils' websites (see section 3). For the earlier 2015 Modifications, please see **xxxxxxx**.

What can I comment on?

- 2.4 This consultation relates specifically to proposed Main Modifications to the Local Plans identified by the planning Inspectors as may be necessary to ensure the plans can be found 'sound', that have not previously been formally consulted upon.
- 2.5 Comments can be made setting out why you support or object to the changes proposed by the Main Modifications. For ease of reference, the Main Modifications are shown in **bold** text. It is only the wording in the bold text that can be commented on. This approach is consistent with guidance from the Planning Inspectorate (Examining Local Plans Procedural Practice, December 2013, paragraph 8.17²).
- 2.6 The Main Modifications have been subject to Sustainability Appraisal. Comments can also be made to the Sustainability Appraisal Addendum, which accompanies the consultation.
- 2.7 The Councils have also published some Additional (minor) Modifications. These do not form part of the consultation but please let the Councils know if you identify any errors or further factual updates that should be made.

² Paragraph 8.17 says: "If the Plan has been changed, it may have to undergo another consultation period so that interested persons have the opportunity to make representations about the changes".

What can I NOT comment on?

- 2.8 The current consultation is not intended as a process to repeat the consultations already undertaken on the Proposed Submission Local Plans in Summer 2013 and Proposed Modifications Joint Consultation in December 2015. As a result, this consultation does not include modifications that have previously been formally consulted upon, unless a modification consulted on in 2015 has been further modified subsequently. In these circumstances, comments are only invited on the further amendments in bold text rather than the modification as a whole. The Inspectors have already considered the comments received to earlier consultations and are not inviting further comments on those issues through this current consultation.
- 2.9 For absolute clarity - this is not a consultation on the Local Plans as a whole. It is only in respect of the changes proposed by the Main Modifications identified by the Inspectors. Any representations made which go beyond commenting on the Main Modifications or the accompanying Sustainability Appraisal, which are the subject of this consultation, will not be registered.

How to have your say

- 2.10 Once you have looked through this consultation document, please send us your comments:
- **Using the Councils' online consultation system** – This is the Councils' preferred means of receiving comments as it is the fastest and most accurate method, helping us to manage your representations quickly and efficiently. Instructions on how to use the online system are provided on the Councils' websites and officers in the planning policy teams are available to help if you have any queries.
 - To comment on the modifications to the Cambridge Local Plan, please use the online consultation system: <http://cambridge.jdi-consult.net/localplan/>
 - To comment on the modifications to the South Cambridgeshire Local Plan, please use the online consultation system: <http://scambs.jdi-consult.net/localplan/>
 - **Using the response form provided by the Councils** – Electronic and paper copies of the response forms are available:
 - If you have access to the internet you can download the electronic form from the Councils' websites, fill it in, and email it to the Councils.
 - If you do not have access to a computer, a paper response form can be completed and sent to either Council. Copies of the paper response forms are available at the Councils' customer service centres or directly from the planning policy teams.

Please note that you will need to fill in a separate response form for each Main Modification you make comments to.

Deadline for comments

- 2.11 Please note that the deadline for submitting responses to the Councils is **5pm on Wednesday 20 December 2017**. Unfortunately responses received after this deadline cannot be accepted. If you have any queries as to how to submit comments, or about the consultation as a whole, please contact one of the planning policy teams using the contact details at [paragraph 2.16 below](#).

What happens next?

- 2.12 Once this consultation has concluded the Councils will register all relevant comments received and publish them on their websites; only comments that relate to the Main Modifications within this consultation document and the accompanying Sustainability Appraisal Addendum will be accepted and registered.
- 2.13 The comments (in full) relating to the Main Modifications and Sustainability Appraisal Addendum will be submitted to the Inspectors undertaking the examination.
- 2.14 The Inspectors will consider all the comments received on the Main Modifications and Sustainability Appraisal Addendum and decide whether any further hearings are required. They will then present their final conclusions in their Reports into the examination of each Local Plan. If the Reports conclude that the Local Plans are 'sound' with a final list of Modifications, the Councils can move forward to adopt the Local Plans, subject to making the Modifications identified by the Inspectors.
- 2.15 The Inspectors will not consider comments to the Additional (minor) Modifications as these do not materially affect the policies in the Local Plans. Any comments received to the Additional Modifications will, however, be considered by the Councils.

We're here to help

- 2.16 Your views are important to the Inspectors, but we recognise that the planning system is not always easy to understand and navigate. We want to make sure that everyone has the opportunity to have their say, regardless of their previous experience with planning matters. Officers from both authorities' planning policy teams are here to help guide you through the process, and you can contact us using one of the following methods:

Planning policy team, Cambridge City Council:

- You can phone the Planning Policy Team on 01223 457200;
- You can email us at policysurveys@cambridge.gov.uk

Planning policy team, South Cambridgeshire District Council:

- You can phone the Planning Policy Team on 01954 713183;
- You can email us at ldf@scambs.gov.uk

- 2.17 Alternatively, if you have a query specifically relating to the examination process, please contact the Programme Officer for both Local Plans, Gloria Alexander:
- You can phone 07803 202578
 - You can email programme.officer@cambridge.gov.uk or programme.officer@scambs.gov.uk
- 2.18 Please remember that the deadline for submitting responses to the Councils is **5pm on Wednesday 20 December 2017**.

3. Proposed Main Modifications to the Cambridge and South Cambridgeshire Local Plans

Summary of the issues addressed in the Main Modifications

- 3.1 The Main Modifications included in this consultation document are summarised below. Some Modifications are common to both Local Plans whilst others are specific to each individual plan.

Joint Issues:

Strategy:

- New policies committing to an early review of the Local Plans starting in 2019, which reflects the Councils' commitment under the City Deal to start a new joint Local Plan in 2019;
- Inclusion in the Local Plans of the methodology for calculating 5 year housing land supply for both areas and jointly, endorsing the application of the 'Liverpool Method' but changing from a 5% to a 20% buffer;

Housing:

- Amended policies on affordable housing, including raising the threshold where affordable housing is sought to sites of more than 10 dwellings responding to changes in national policy;
- Changes to policies regarding housing mix and residential space standards, responding to changes in national policy;
- Revisions of policies regarding provision for Gypsy and Travellers and Travelling Showpeople to reflect the updated Accommodation Assessment, and in response to changes in national policy, which has not resulted in any new sites being identified in the Local Plans;

Community Facilities:

- Added references to the Councils' Playing Pitch Strategy and Indoor Facilities Strategy, so that they are taken into account in planning decisions;

Monitoring:

- Changes to monitoring indicators to make them more effective.

South Cambridgeshire specific:

Strategy:

- Changes to incorporate the employment area west of London Road Pampisford within Sawston village framework, so that Rural Centre policies apply to this area;
- Changes to support the preparation of Neighbourhood Plans.

Strategic Sites:

- Amendments to the policies for the delivery of the new settlements at Waterbeach and Bourn Airfield, including site boundary changes;

Natural and Historic Environment:

- Revisions to policies controlling the type, and mitigating the impacts of, development in the Green Belt;
- Review of Local Green Space designations, with the removal of some sites, and replacement of some sites with Protected Village Amenity Areas (affecting a number of villages);

Economy:

- Allocation of additional employment land at Cambridge Biomedical Campus (previously consulted on in 2015 as a provisional modification);

Successful Communities:

- Deletion of a number of open space allocations (at Over, Swavesey, and Great Shelford);

Cambridge Specific:

Comment [HC3]: Note - These are still being checked by the City Council and topic sub-headings will be provided

- Amendments to policies concerning Areas of Major Change and Opportunity Areas;
- Amendment to the Mitchams Corner opportunity area boundary
- Amendment to housing site allocation GB2 Land South of Worts' Causeway
- Changes to housing allocations U1 – Old Press/Mill Lane and R17 – Mount Pleasant house to student accommodation;
- Changes to provide further guidance on how noise will be considered (Policy 35: Protection of human health from noise and vibration)
- Student accommodation - Amendments to Policy 44: Specialist colleges and language schools to strengthen wording regarding use of family dwelling houses to accommodate students of specialist colleges and/or language schools, and Policy 46: Development of student housing as a result of further evidence;
- Update to the Hotels policy to reflect current market conditions;
- Amendments to policies on tall buildings and design.

Main Modifications

3.2 There are separate tables for the Main Modifications proposed to each Local Plan – see:

- **Chapter 4** for the Main Modifications to the Cambridge Local Plan; and
- **Chapter 6** for the Main Modifications to the South Cambridgeshire Local Plan.

3.3 The Main Modifications are set out in plan order for each Local Plan. Where it has not been possible to show information (such as tables, diagrams and maps) within the table, these are provided following each Council's respective table of modifications.

3.4 The Main Modifications listed in these tables need to be read alongside the Proposed Submission Local Plans:

- Cambridge Local Plan: www.cambridge.gov.uk/ccm/navigation/planning-and-building-control/planning-policy/local-plan-review
- South Cambridgeshire Local Plan: www.scambs.gov.uk/localplan

3.5 The tables for Main Modifications include the following information:

Modification Ref:	Proposed Main Modification number for reference. The reference number is composed as follows:	
	Cambridge Local Plan:	South Cambridgeshire Local Plan:
	CC-MM001	SC-MM001

Local Plan Page	The page number from the Cambridge Local Plan 2014: Proposed Submission or the Submission South Cambridgeshire Local Plan 2014 where the original policy / paragraph text can be viewed .
Policy / paragraph	The section of the Cambridge Local Plan 2014: Proposed Submission or the Submission South Cambridgeshire Local Plan 2014 (or their respective Policies Map) to which the Main Modification relates.
Proposed modification	<p>A brief description of the change proposed together with the original text of the Local Plan shown as it is proposed to be modified.</p> <p>The following format has been used to denote the modifications subject to consultation:*</p> <ul style="list-style-type: none"> • Underlined text = new text suggested • Strikethrough text = text proposed for removal <p>Note: changes to tables, figures and the Policies Maps are described here and amended versions are provided at the end of the table.</p>

Comment [HC4]: Links to be added

Important note: in a small number of cases, Modifications include text that was subject to consultation previously through the Proposed Modifications Joint Consultation Report in December 2015 (RD/MC/010). Only the new Modifications are subject to consultation; these are shown in **bold text**. The previously modified text has also been included for information and to provide context for the Main Modifications currently being consulted upon, but is not open for comment; this text is shown in the same format, but not in bold.

Additional (Minor) Modifications

- 3.6 The Councils have published some Additional (minor) Modifications, but please note that they will not be a matter for the examination. The Inspectors are not concerned with proposed minor modifications as these are not material in nature or necessary to ensure the plans are 'sound'. They include minor changes such as typographical errors and factual updates.
- 3.7 The Additional (minor) Modifications are set out in separate tables for each Local Plan - see [Chapter 5](#) for the Additional Modifications relating to the Cambridge Local Plan and [Chapter 7](#) for the Additional Modifications to the South Cambridgeshire Local Plan.
- 3.8 The minor modifications are also set out in plan order for each Local Plan. Where it has not been possible to show information (such as tables, diagrams and maps) within the table, these are provided following each Council's respective table of minor modifications.
- 3.9 Please note that the Additional (minor) Modifications do not form part of this formal consultation. However if you identify any errors or further factual updates that should be made to the submitted Local Plans, please inform the relevant Council by emailing the addresses provided.
- 3.10 The format of the Additional Modifications is as follows:

Additional Modification Ref:	<p>Proposed Additional (minor) Modification number for reference. The reference number is composed as follows:</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">Cambridge Local Plan:</td> <td style="width: 50%;">South Cambridgeshire Local Plan:</td> </tr> <tr> <td>CC-AM001</td> <td>SC-AM001</td> </tr> </table>	Cambridge Local Plan:	South Cambridgeshire Local Plan:	CC-AM001	SC-AM001
Cambridge Local Plan:	South Cambridgeshire Local Plan:				
CC-AM001	SC-AM001				
Local Plan Page	<p>The page number from the Cambridge Local Plan 2014: Proposed Submission or the Submission South Cambridgeshire Local Plan 2014 where the original policy / paragraph text can be viewed.</p>				
Policy / paragraph	<p>The section of the Cambridge Local Plan 2014: Proposed Submission or the Submission South Cambridgeshire Local Plan 2014 (or their respective Policies Map) to which the Additional (minor) Modification relates.</p>				
Proposed Additional (minor) Modification	<p>A brief description of the change proposed together with the original text of the Local Plan shown as it is proposed to be modified.</p> <p>The following format has been used to denote minor modifications:</p> <ul style="list-style-type: none"> • <u>Underlined text</u> = new text suggested • Strikethrough text = text proposed for removal 				

Comment [HC5]: Links to be added

Appendix A

Principal Evidence Documents

The list below includes the principal relevant documents that are considered to be most relevant to the Main Modifications that are being consulted on. However, reference should be made to the Examination library for the full evidence base of documents which concern the submitted plans.

The full Reference Document Library for both Cambridge and South Cambridgeshire can be viewed at: <https://www.cambridge.gov.uk/local-plan-core-documents-library>

Annual Monitoring Reports			
RD/AD/480	South Cambridgeshire District Council Annual Monitoring Report 2016	South Cambridgeshire District Council	Dec 2016
RD/AD/490	Cambridge City Council Annual Monitoring Report 2016	Cambridge City Council	Dec 2016
Development Strategy			
RD/Strat/221	Cambridgeshire (excluding Fenland), King's Lynn & West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment	Opinion Research Services	October 2016
RD/Strat/530	Examination into the Soundness of the Cambridge Local Plan and South Cambridgeshire Local Plan Proposed Modifications to Monitoring Indicators (July 2017)	South Cambridgeshire District Council and Cambridge City Council	July 2017
Strategic Sites			
Matter Statement	Historic England – statement to Examination (Matter SC/6) (Regarding Waterbeach New Town Northern Boundary)	Historic England	February 2017
RD/SS/310	Waterbeach - Landscape and Heritage Appraisal of Denny Abbey and its Setting	LDA Design	Oct 2013
RD/SS/320	Waterbeach - Denny Abbey and its Setting: Analysis and Recommendations	LDA Design	Nov 2014
RD/SS/330	Waterbeach: Heritage Appraisal	Urban & Civic	April 2016
Protecting and enhancing the natural and historic environment			

RD/NE/370	Further work on Policy NH/12: Local Green Space responding to the Inspectors' Interim Findings: Appendix 5 (Part 1) Intro, Key & Villages A-E Appendix 5 (Part 2) Villages F-K Appendix 5 (Part 3) Villages L-T Appendix 5 (Part 4) Villages U-Z Appendix 6: LGS Proforma	South Cambridgeshire District Council	Aug 2017
Housing			
RD/H/810	Evidence for Residential Space Standards in South Cambridgeshire	South Cambridgeshire District Council	2016
RD/H/890	Cambridgeshire insight - data regarding House boats Houseboats from council tax records, 2015 and 2016 Marina and moorings list April 2017	Cambridgeshire Insight	2015-2017
RD/H/920	Cambridge City Council River Moorings Policy 2017-2023: Technical Document	Cambridge City Council	Aug 17
RD/E/260	Counsel's Advice Note and Proposed Modifications to Policies 77 and 78 (Hotels)	Cambridge City Council	July 2017
Communities, services and facilities			
RD/CSF/190	Playing Pitch Strategy 2015-2031 Updated June 2016	Cambridge City Council and South Cambridgeshire District Council	2016
RD/CSF/200	Indoor Sports Facility Strategy 2015-2031 Updated June 2016	Cambridge City Council and South Cambridgeshire District Council	2016
Modifications Consultation (additional Documents after Public Consultation 2015)			
RD/MC/021	Supplement to Sustainability Appraisal Addendum Report (November 2015) (Revised) <ul style="list-style-type: none"> • Non-technical Summary • Main Report • Annex 1 – Part 1 • Annex 1 – Part 2 • Annex 1 – Part 3 • Annex 1 – Part 4 	Ramboll Environ on behalf of Cambridge City Council & South Cambridgeshire District Council	2016

	<ul style="list-style-type: none"> • Annex 1 – Part 5 • Annex 1 – Part 6 • Annex 1 – Part 7 • Annex 1 – Part 8 • Annex 1 – Part 9 • Annex 2 		
RD/MC/031	Cambridge Inner Green Belt Boundary Study (November 2015) Supplement – March 2016	LDA Design	March 2016
RD/MC/041	Cambridge and South Cambridgeshire Local Plan Examination – Objectively Assessed Housing Need: Responses to Objectors (March 2016)	Peter Brett Associates	March 2016
RD/MC/073	A428 Constraints Report : South Cambridgeshire District Council <ul style="list-style-type: none"> • Main Report • Appendix C – Part 1 • Appendix C – Part 2 • Appendix C – Part 3 	Atkins	March 2016
RD/MC/074	A10 Corridor Constraints Study: Constraints Assessment February 2016. Cambridgeshire County Council	Mott MacDonald	Feb 2016
RD/MC/110	City Deal and the Cambridge and South Cambridgeshire Local Plans (March 2016)	Cambridge City Council & South Cambridgeshire District Council	March 2016
RD/MC/120	Proposed Modifications – Report on Consultation (March 2016)	Cambridge City Council & South Cambridgeshire District Council	March 2016
RD/MC/140	Cambridge Local Plan Proposed Modifications (March 2016)	Cambridge City Council & South Cambridgeshire District Council	March 2016
RD/MC/150	South Cambridgeshire Local Plan Proposed Modifications (March 2016)	Cambridge City Council & South Cambridgeshire District Council	March 2016

RD/MC/151	Errata to South Cambridgeshire Local Plan Schedule of Proposed Modifications (March 2016) (RD/MC/150)	Cambridge City Council & South Cambridgeshire District Council	March 2017
RD/MC/160	<p>Evidence regarding land south of the Cambridge Biomedical Campus</p> <ul style="list-style-type: none"> • Part 1 – Covering Letter • Part 2 – Indicative Masterplan and Section A Drawing • Part 3 – Flood Modelling and Drainage Strategy Report • Part 4A – Preliminary Site Access Study, including Figures 1 to 5 • Part 4B – Preliminary Site Access Study – Figures 6 & 7 and Appendices • Part 5 – Landscape and Visual Appraisal • Part 6 – Ecological Appraisal • Part 7 – Arboricultural Assessment 	Carter Jonas	2016
RD/MC/161	Council's Assessment of land South of Cambridge Biomedical Campus	South Cambridgeshire District Council	2016
RD/MC/162	Addendum letter to the Ecological Appraisal concerning land south of the CBC	Carter Jonas	2016
RD/MC/163	Farmland bird mitigation RSPB leaflet – wild bird seed	Carter Jonas	2016
RD/MC/164	Farmland bird mitigation RSPB leaflet – beetle bank	Carter Jonas	2016
RD/Sub/C/121	<p>Cambridge City Council Habitats Regulations Assessment Part 1 – Update February 2016</p> <p>Cambridge City Council Habitats Regulations Assessment Part 2 – Update February 2016</p>	Cambridge City Council	2016

South Cambridgeshire Further Modifications (2016)			
RD/FM/010	Further Modifications to the South Cambridgeshire Local Plan	South Cambridgeshire District Council	2016
RD/FM/011	Information re Proposed Modifications Identified in Examination Statements	South Cambridgeshire District Council	2016
RD/FM/012	Further Proposed Modifications to the South Cambridgeshire Local Plan – Sustainability Appraisal Screening	South Cambridgeshire District Council	2016
RD/FM/013	<p>Further Evidence Bourn Airfield MDS Boundary</p> <ul style="list-style-type: none"> • Part 1 – Main Report • Part 2 – Appendix 1 Bourn Airfield – a landscaped-led settlement (Chapters 1 -3) • Part 3 – Appendix 1 Bourn Airfield – a landscaped-led settlement (Chapters 4 & 5) • Part 4 – Appendix 2 Presentation to the Cambridge Quality Panel and Report of Panel Meeting 29th June 2016 (Presentation sections 1 & 2) • Part 5 – Appendix 2 Presentation to the Cambridge Quality Panel and Report of Panel Meeting 29th June 2016 (Presentation sections 3 to 7) • Part 6 – Appendix 2 Presentation to the Cambridge Quality Panel and Report of Panel Meeting 29th June 2016 (Report of the Panel) • Part 7 – Appendix 3 	South Cambridgeshire District Council	2016

	Proposed Submission Policies Map Inset I with proposed minor change SCDC July 2013 <ul style="list-style-type: none"> Part 8 – Appendix 4 Proposed changes by Countryside Properties/the Taylor Family to Policy Map Inset I 		
RD/FM/014	Council's Assessment of Evidence re Bourn Airfield	South Cambridgeshire District Council	2016
Cambridge further modifications (2017)			
RD/CFM/010	Further Modifications to the emerging Cambridge Local Plan – Student Accommodation, Gypsies and Travellers, and Accessible Homes	Cambridge City Council	Jan 2017
RD/CFM/020	Proposed Modifications to the Cambridge Local Plan – Sustainability Appraisal Screening	RAMBOLL - ENVIRON	Jan 2017
RD/CFM/030	Assessment of Student Housing Demand and Supply for Cambridge City Council: Report to Cambridge City Council	Cambridge Centre for Housing and Planning Research	Jan 2017
RD/CFM/040	Accessible Housing in Cambridge: A Study into accessible housing requirements in Cambridge for the emerging Local Plan	Cambridge City Council	Jan 2017

Mon 30/10/2017 09:37

From: Programme Officer

To: Caroline Hunt

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Dear Caroline

Thank you for your email and attachments. Please would you arrange for the attachments to be printed, 3 copies, in colour, so that I can get them into the post to the Inspectors for their attention as soon as possible - I have made them aware that I have received these by email and shall forward them when I hear back. If you'd let me know when they are available I shall come in to pick them up.

I shall get back to you as soon as I have feedback from the Inspectors regarding timing.

Kind regards

Gloria

Gloria Alexander

Programme Officer

Tue 31/10/2017 16:52

From: Caroline Hunt

To: Programme Officer

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Dear Gloria

Further to my email below and subsequent communications, the main question for the Inspector is when she thinks she will be able to get back to us on our queries and to sign off the Mods. We are pressing ahead with preparations for the Mods consultation at risk, but we can only go so far until we have the Inspectors' response including whether any other changes are necessary.

It would be really helpful if the Inspector could share with us her initial view once she has had sight of my email tomorrow.

Realistically we need to either receive the Inspectors' full response to our queries by the end of Friday, or know with confidence by the end of Friday that we will be able to respond by early next week, in order to put the notice about the consultation in the paper which is due to be submitted by the end of this week (at the very latest we could potentially get away with very first thing on Monday if that helped the Inspectors).

That would be for a consultation period Wednesday 8th Nov to Wednesday 20 Dec. We would still need to know by end of Friday (because of the notice) for a less ideal fall back consultation period of Friday 10th Nov to Friday 22 Dec, which that is not our preferred start date as it would take consultation right up to close of play on the last working day before Christmas.

I fully appreciate that the Inspectors need sufficient time to properly respond to our email, but I hope it is helpful for them to know what we are aiming for, which avoids the delays that would be caused by a run over the Christmas period.

I look forward to hearing from you once you have heard from the Inspector.

Kind regards

Caroline

Caroline Hunt | Planning Policy Manager

Wed 01/11/2017 15:52

From: Programme Officer

To: Caroline Hunt

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Dear Caroline

Further to your email below, the Inspector has indicated, after an initial look at the documents provided and the questions being asked by the Councils, that there is a considerable amount of input required by the Inspectors to deal with these. They are unable to guarantee sufficient time to properly deal with this to meet the deadline you request.

I'll get back to you as soon as I have any more certain information regarding timings.

Kind regards

Gloria

Gloria Alexander

Programme Officer

Wed 1/11/2017 17:23

From: Caroline Hunt

To: Programme Officer

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Dear Gloria

Thank you for getting back to me. I would be grateful if you can keep me informed of the Inspector's progress. Can I please request an update from the Inspector on Friday so we know whether we can commit to starting consultation at some point next week and send off the notice? Unfortunately the notice deadline is Friday (or potentially first thing Monday) for any edition of the local newspaper next week, and therefore any start date next week. We are checking if we can get any leeway in that.

I hope that the Inspector may feel in a better position to advise more firmly over the next couple of days. In the meantime if there is anything arising that we can assist with as the Inspector works through the Modifications, please let me know. They are the priority and the consultation document text has a bit more flexibility, if that helps.

Kind regards

Caroline

Caroline Hunt | Planning Policy Manager

Thu 02/11/2017 09:36

From: Programme Officer

To: Caroline Hunt

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Dear Caroline

The Inspectors have now indicated that they will not be in a position to respond within your preferred timescale. The Inspectors expect to be able to respond by the end of next week.

Kind regards

Gloria

Gloria Alexander

Programme Officer

Fri 10/11/2017 20:53

From: Programme Officer

To: Caroline Hunt

Re: Cambridge and South Cambridgeshire Main Modifications - response to Inspectors' email

Attachments: LPs proposed Mods response to Councils Nov 2017.pdf

Dear Caroline

Attached please find our note containing the Inspectors' response to the Councils' documents provided in your email below.

Please do not hesitate to get back to me if you have any queries.

Kind regards

Gloria

Gloria Alexander

Programme Officer.

LPs proposed Mods response to Councils Nov 2017

New or Amended Proposed Main Modifications

Subject to the comments made below, we are content for the new or amended proposed modifications to be published for consultation. Please note that we are not endorsing the contents of the columns headed 'reason' and 'Has it been subject to consultation', simply because we will not wish to have these included in the schedules which will form the Appendices to our reports and we have not, therefore, taken the time to check the text.

Draft Main Modifications Consultation Document introduction

We regard this as primarily a matter for the Councils. However, for the reasons given below we do not favour the inclusion of paragraph 1.6 and also note that paragraph 1.7 will need to be amended.

Five-year housing land supply

Having regard to paragraph 47 of the NPPF, it is a clear expectation that, at adoption, a local plan will ensure the delivery of an on-going (our emphasis) five year supply of housing land with flexibility to respond to changing circumstances. We are not persuaded that simply including a methodology for calculating a five year housing land supply, without any data, will achieve this

requirement. It is in the nature of the process that aspects of any plan will not reflect the most up-to-date statistics within a short period of time after adoption, and it is inevitable that the requirement to identify and update annually (our emphasis) a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements (plus the relevant buffer), will mean that figures in a local plan will be quickly superseded. However, we are not persuaded that this is a good reason for not including figures in the plan to indicate the position at, or close to, the time of adoption. It will be necessary to include information on how the five year requirement is expected to be delivered, i.e. the main sources of supply. We are aware that the Councils previously consulted on modifications to remove the housing trajectories from the plans. However, this was not done in response to any request from us and, as such, our conclusions on whether such a modification(s) is necessary for soundness will be included in our report.

In the circumstances, we are asking you to redraft the proposed modifications relating to this issue. One approach you may want to consider is to include the methodology and data in Annexes to the Plans, which can then be referred to from within the body of the Plan. It can be made clear in the Annexe that the data will be superseded by subsequent AMRs because of the requirement in the NPPF for it to be updated annually. If you wish to base the calculations in the Plans on figures to be produced in December, we suggest that you start the consultation once those figures become available. Please also have regard to our previous request that the modifications for each plan should set out the information for its own area and both plans should include the same information based on the joint trajectory.

Land South of Cambridge Biomedical Campus (CBC)

We are content for you to proceed with consultation on SCMM212 and SCMM213, with the inclusion of the additional sentence relating to the access to the site. As this is a straightforward addition, we do not need to see the revised version of these MMs. Land South of Fulbourn Road Consultation has already been carried out on Policy E/2, as included in the submission draft plan, and as proposed to be modified by the Council in 2015. There is no requirement to engage in consultation on the Inspectors' findings. The comments, provided to you in recent weeks, were intended to assist you with drawing up the schedule of main modifications, rather than being presented as interim findings which would be the usual course of events if we were asking you to carry out further work because we had identified a soundness issue. We have no objection to the recent email correspondence being made publically available. However, we would not favour a specific reference to this particular site in the consultation document or by writing to specific representors, and given the scope of the consultation already undertaken, we do not feel that that this could be perceived as procedurally unfair. The comment regarding Policy E/2 under "other minor issues" is noted.

Reference to relevant background evidence

We agree that it would be helpful to include a list of the principal evidence documents. It may assist if you make it clear in the consultation document that

this evidence has been available in the online Reference Document Library from the dates given (assuming that is the case).

Affordable Housing

We are content for consultation to proceed on the basis of the revised wording included in the latest schedules. The reference to the Central Lincolnshire Plan as an example equally applies to the South Cambridgeshire Plan.

Cambourne West

The fact that planning permission may have been granted for a similar development does not, of itself, make a Local Plan allocation unsound. In relation to Cambourne West, we are content for the proposed modifications to be published for consultation. Taking into account any responses received, we will conclude on whether those modifications are necessary for soundness in our report.

South Cambridgeshire Policies Map

SC-MM325 (add bullet point above the existing bullet point to read: Glebe Land (NH/12- 098a)

We agree with the Council's comments for the reasons given by the Council.

SC-MM339 (a-c) (d-delete "land to the north of Bannold Road" and replace with "Barracks Frontage NH/12-167")

We agree with the Council's comments for the reasons given by the Council.

SC-MM340 (reinstate the modification; change the site reference to "Newton Road Play Area NH12-171")

We agree that SC-MM340 can be removed from the modifications schedule for the reasons given by the Council.

South Cambridgeshire Other Minor Issues

SC-MM151, SC-MM225, SC-MM230 - can these be made as additional modifications? MM230 is a policy change? In respect of SC-MM230, the addition of the words "horse riding" would appear to be for clarification and its inclusion would not cause any material change to the thrust of the Policy E/19: Tourist Facilities and Visitor Attractions. It is a matter for the Council to decide whether 'additional modifications' fall within the limits prescribed by the Regulations.

Next steps

Once we have agreed a revised version of draft modifications relating to housing land supply, we would be pleased to receive a 'final' copy of the schedules, which we will formally confirm as appropriate for consultation.

Laura Graham
Alan Wood
Inspectors