



The Planning Inspectorate

Report to South Cambridgeshire District Council

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Inspectors appointed by the Secretary of State

Date: 29 August 2018

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the South Cambridgeshire Local Plan

The Plan was submitted for examination on 28 March 2014

The examination hearings were held between 04 November 2014 and 30 April 2015;
and between 07 June 2016 and 18 July 2017

File Ref: PINS/W0530/429/13

Abbreviations used in this report

AA	Appropriate Assessment
AAP	Area Action Plan
CIGBBS	Cambridge Inner Green Belt Boundary Study
DtC	Duty to Co-operate
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
JSPU	Joint Strategic Planning Unit
LDS	Local Development Scheme
LGS	Local Green Space
LP	Local Plan
MDS	Major Development Site
MM	Main Modification
NPPF	National Planning Policy Framework
OAHN	Objectively assessed need for housing
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SDSR	Sustainable Development Strategy Review
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the South Cambridgeshire Local Plan provides an appropriate basis for the planning of the South Cambridgeshire District, provided that a number of main modifications [MMs] are made to it. South Cambridgeshire District Council has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

All the MMs were proposed by the Council, and were subject to public consultation over periods of seven weeks in December 2015-January 2016 and six weeks in January – February 2018. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- A modification to recognise the Council's intention to carry out an early review of this Plan through the preparation of a joint Local Plan with Cambridge City Council;
- Modifications to provide clarity over the calculation of a five year housing land supply;
- Modifications to the Cambridge East Strategic Site, including the allocation of additional land for residential development,
- An additional allocation of land as an extension to the Cambridge Biomedical Campus;
- Changes to the designation of sites as Local Green Space to reflect the Council's review of the evidence base and to accord with national planning policy;
- Amendment to the policies relating to Waterbeach and Bourn Airfield new settlements to remove phasing requirements and to change from the preparation of AAPs to SPDs.
- Amendments to policies regarding provision for gypsies and travellers and travelling showpeople;
- Amendments to policies relating to energy efficiency standards, technical housing standards and wind energy to reflect national planning policy;
- Amendments to ensure that the approach to the provision of affordable housing is consistent with national policy; and
- A revised framework for monitoring.

Introduction

1. This report contains our assessment of the South Cambridgeshire Local Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The South Cambridgeshire Local Plan, submitted in March 2014, is the basis for our examination. It is the same document as was published for consultation in July 2013. The Plan was submitted for examination alongside the Cambridge City Local Plan 2014. The two plans share a joint core document library and a common spatial development strategy, as explained below.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. Our report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearing(s), are necessary. The MMs are referenced in bold in the report in the form **SC1, SC2, SC3** etc, and are set out in full in the Appendix.
4. The Council carried out consultation on a first set of MMs between 02 December 2015 and 25 January 2016 and carried out sustainability appraisal (SA) on them. Following the close of the examination hearings, the Council prepared a further schedule of proposed MMs and carried out SA on them. The second schedule and the SA were subject to public consultation between 5 January 2018 and 16 February 2018. We have taken account of the consultation responses in coming to our conclusions in this report and in this light we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary, we have highlighted these amendments in the report.
5. The Council has proposed a number of modifications which are intended to update the text of the Plan, which is understandable given the length of the examination, or in some cases to make improvements to the Plan. However, where these are not necessary to make the Plan sound, we have removed them from the Appendix. Within the limits prescribed by the Regulations, the Council can make additional minor modifications to the Plan at adoption.

Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Proposed Submission South Cambridgeshire Policies Map as set out in RD/Sub/SC/020.
7. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. These further changes to the policies map were published for consultation alongside the Council's proposed modifications in December 2015 and in January 2018 (RD/MC/010 and RD/MM/010) and are now contained in document RD/EX/150.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in RD/Sub/SC/20 as amended by RD/EX/150.

Assessment of Duty to Co-operate

9. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
10. There has been a long history of joint working between the District Council, Cambridge City Council and the other Cambridgeshire Districts. Together with Peterborough City Council, the Cambridgeshire Districts set up a Joint Strategic Planning Unit (JSPU) in 2012. The JSPU facilitated meetings of senior Members from each of the Districts and produced the Joint Statement on Strategic Planning in Cambridgeshire (RD/Strat/030) and the Cambridgeshire and Peterborough Memorandum of Cooperation: Supporting the Spatial Approach 2011-2031 (RD/Strat/100). The Memorandum supported the development of a coherent and comprehensive growth strategy across Cambridgeshire and Peterborough.
11. A wide range of potential strategic matters have been considered by the JSPU and through engagement with other bodies including the Environment Agency, Highways England, Natural England and English Heritage. Strategic issues considered include: housing need and distribution; employment land; flood risk; and the provision of infrastructure, including transport.

12. Section 28 of the Act gives the power to local planning authorities to prepare a joint plan. Section 33A(6)(b) requires local planning authorities to consider whether to agree under section 28 to prepare joint local development documents. Section 33A(7) requires anyone who is subject to the duty to cooperate to have regard to any guidance given by the Secretary of State about how the duty is to be complied with.
13. Guidance has been provided by the Secretary of State at paragraph 16 of PPG which states: *Where two or more local planning authorities decide to work together to prepare Local Plans or policies they should consider how to achieve this most effectively. For some authorities the most appropriate way might be to form a joint committee Alternatively, the local planning authorities could prepare a joint plan, using powers **section 28 of the 2004 Act**, or align their Local Plans, so that they are examined and adopted at broadly the same time.*
14. The Guidance suggests, therefore, that the preparation of a joint plan is one way of complying with the duty to cooperate. South Cambridgeshire District Council and Cambridge City Council advised that the preparation of a joint local plan had been considered at officer level, but was not subject to a formal resolution by Members.
15. The Councils have chosen the last of the options referred to in PPG, that is to align, closely, their two plans. A Joint Strategic Transport and Spatial Planning Group, comprising Members from Cambridge City, South Cambridgeshire District and Cambridgeshire County Councils was set up in March 2012. One of the tasks for the Group has been to ensure policy alignment that will allow the timely development of both authorities new Local Plans.
16. Overall, we are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

17. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 17 main issues upon which the soundness of the Plan depends. Under these headings our report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Is the spatial strategy sound?

18. The starting point for the spatial strategy, which is common to this Plan and the Cambridge City Local Plan 2014, is the non-statutory Cambridge and South Cambridgeshire Sustainable Development Strategy Review (SDSR) (RD/Strat/040), prepared by the Cambridgeshire and Peterborough Joint Strategic Planning Unit. The SDSR establishes a sustainable development sequence for the Cambridge sub-region as follows: within the urban area of Cambridge; on the edge of Cambridge; one or more new settlements; within or adjoining market towns; and at sustainable villages. The market towns, as defined for the purposes of the SDSR, are outside the administrative areas of

Cambridge and South Cambridgeshire (Greater Cambridge) and therefore this level is not relevant to the hierarchy as applied to Greater Cambridge.

19. The SDSR recognises the significant advantages in sustainability terms of locating development on the urban edge but conflict with Green Belt purposes is also noted. The SA Addendum Report November 2015 (RD/MC/020) and Supplement (RD/MC/021) also recognises the sustainability benefits of sites located on the edge of Cambridge particularly in relation to the use of sustainable transport modes. However most of the land on the edge of Cambridge, within South Cambridgeshire, is in the Green Belt and with the exception of a limited number of small sites referred to later in this report the Council is not proposing to release any significant areas of land from the Green Belt. Significant tracts of land have been taken out of the Green Belt on the edge of Cambridge through previous rounds of plan making and these sites are carried forward into this Plan and still have significant remaining development capacity. And so, having regard to the degree of protection afforded to the Green Belt in national policy, moving to the third tier of the SDSR is justified.
20. **SC7** and **SC8** are necessary to update the tables showing the distribution of housing development across the development sequence. **SC20** modifies the Key Diagram and is necessary to reflect various modifications including the extension to the CBC (policy E/1B) and the revised proposals for Cambridge East (policy SS/3). We have amended the wording to reflect our findings regarding policy E/2 and the Council will need to amend the revised Figure 2 to revert to what is shown on the submission draft Figure 2 in respect of this allocation.
21. The Plan proposes that development needs will be met at two new settlements at Waterbeach and Bourn Airfield. We have some concerns regarding the challenges of delivering new development at Waterbeach and Bourn, as set out below. However, there is no requirement for these sites to deliver housing in the early years of the plan period and consequently there will be an opportunity to review progress through the preparation of the joint local plan with Cambridge City Council, as required by the terms of the Greater Cambridge City Deal (see issue 17 below).
22. The NPPF affords a very high degree of protection to the Green Belt and we consider later in this report whether there are exceptional circumstances to justify the alterations to the boundary of the Green Belt.

Conclusion

23. We therefore conclude that the spatial strategy is sound.

Issue 2 – Whether the Plan identifies a sound assessment of the overall level of housing need

Housing Market Area (HMA)

24. The Strategic Housing Market Assessment (RD/Strat/090) is based on the Cambridge HMA which comprises the City Council, South Cambridgeshire District Council, East Cambridgeshire District Council, Fenland District Council,

Huntingdonshire District Council, Forest Heath District Council and St Edmundsbury District Council.

25. The evidence provided by the Council (PM1/CCC&SCDC – Supplement 1) based on data from the 2011 Census demonstrates that the Cambridge HMA has a higher level of commuting self-containment than other options tested, and also a higher level of migration self-containment. It is probably inevitable that any defined HMA will have links with areas beyond its boundary but it is not practical, in this case, to attempt to subdivide local authority areas when defining an HMA.
26. The Cambridge HMA was the basis for the Memorandum of Co-operation (MoC) (RD/Strat/100) between the 7 Authorities in the Area together with Peterborough City Council. The MoC distributed the objectively assessed housing need derived from the sub-regional SHMA. This has been a long-standing arrangement and we find this definition of the HMA is reasonable.

Objectively assessed need for market and affordable housing (OAHN)

27. The OAHN of 19,000 new homes for South Cambridgeshire, included in the submission draft plan, is derived from the Cambridge Sub Region Strategic Housing Market Assessment (SHMA) (RD/Strat/090). In our interim findings (RD/GEN/170) we expressed our concerns that the methodology of the 2013 SHMA was not entirely consistent with Planning Policy Guidance (PPG) which was published in 2014.
28. PPG advises that household projections published by the Department for Communities and Local Government (now MHCLG) should provide the starting point estimate of overall housing need, whereas the SHMA relies on population figures from the 2011 Census, rather than household projections. We also expressed concern that the SHMA did not fully take into account the PPG advice relating to market signals, particularly in relation to affordability.
29. The Council commissioned further work to address these issues. The resulting report by Peter Brett Associates (the PBA report) (RD/MC/040) finds that the CLG 2012 household projections identify a housing need in the District of 17,579 dwellings for the period 2011-2031. The report compares the CLG household projections against alternative demographic scenarios from the Greater Essex Demographic Forecasts produced by the demographers Edge Analytics for the Essex Planning Officer's Society. The Edge Analytics study included South Cambridgeshire (and Cambridge City) to provide a broader picture. The CLG figure is higher than any of the Edge Analytics alternatives, although the differences are relatively small (all the Edge Analytics scenarios are within a range of less than 3,000 dwellings below the CLG projections). In the circumstances, there is no justification for departing from the CLG 2012 projections as the 'starting point' for determining OAHN.
30. PPG advocates the use of the most up-to-date evidence of future household growth, although it suggests that that the national household projection may require adjustment to reflect local demographic factors such as suppressed household formation rates. The Council's evidence (RD/MC/041), which is based on the 2011 Census, demonstrates that household formation rates for South Cambridgeshire are lower than those for England as a whole. This may be explained by the fact that the Census shows that South Cambridgeshire has

above average proportions of people living as a couple. We are not, therefore, persuaded that there is any justification for departing from the rates used in the 2012 national household projections.

31. In July 2016 the Government's 2014-based household projections were issued. The PPG states that, wherever possible, assessments of OAHN should be informed by the latest evidence, but that a change does not automatically mean that housing assessments are rendered outdated every time new projections are issued. To avoid further, potentially substantial, delay in the adoption of the Plan, we have taken the view that the most pragmatic approach is for the latest Government household projections to be considered through the early review of the Plan.
32. The PBA report then considers market signals and concludes that an uplift to the starting point is warranted to take account of market signals relating to affordability. PPG advises that any such upward adjustment should be set at a level which is reasonable. This is a matter of judgement and the report concludes that the appropriate level of uplift for South Cambridgeshire is 10%, citing the fact that market signals point to a modest market pressure, similar to Eastleigh and Uttlesford where a 10% uplift was considered reasonable by the examining Inspectors. We concur with this view. Applying a 10% uplift, $(17,579 \times 110\%) = 19,337$. This figure is slightly above the SHMA figure of 19,000. The SHMA methodology incorporates economic-based projections as well as those based solely on demographic change. The implication is that adopting the higher number will provide very slightly more workers than are required to support expected job growth. On this basis there is no justification for a further uplift to support job growth.
33. The PBA report was criticised for a number of reasons including the fact that it only deals with Cambridge City and South Cambridgeshire whereas the NPPF requires an assessment for the Housing Market Area. We consider that there is some force to this argument but, with the various authorities in the HMA at different stages in preparing or reviewing their local plans, it could lead to an excessive delay in completing this examination if an update for the whole HMA were to be required now. South Cambridgeshire is seeking to meet its OAHN in full and there is no evidence before us that other authorities have made a request to South Cambridgeshire to accommodate their unmet needs. It is reasonable and pragmatic in these circumstances to plan on the basis of these LPA areas and there is no clear evidence that it would lead to a significant under-estimate across the wider area.
34. For the reasons given above, we accept that the assessment of OAHN has some flaws and we are also aware that alternative methodologies used by some representors indicate that the OAHN for the District should be significantly higher than the SHMA figure. However, PPG notes that no single approach will provide a definitive answer. The figure of 19,337 is slightly above the figure derived from the SHMA. We are satisfied that it is acceptable and is the figure that should be included in the Local Plan to ensure it is positively prepared and justified. **SC3, SC12 – SC15** and **SC17**. The issues identified can be reconsidered, as necessary, in the review of the Plan, see issue 17 below.

Affordable housing

35. The SHMA assessed the need for affordable housing according to the then current 2007 Planning Practice Guidance, which has since been replaced by similar guidance at paragraphs 022 – 029 of PPG. These calculations were revised later in the light of new data for 2013/14. The resulting net affordable need for South Cambridgeshire is 5,573 homes over the plan period.
36. The PBA report calculates that, if OAHN is met over the Plan period, the Council will receive enough developer contributions to meet its affordable housing need in full. There is, therefore no justification for applying any further uplift beyond the OAHN to meet affordable housing needs.

Conclusions on OAHN

37. In all the circumstances we consider that the OAHN assessment of 19,337 new dwellings for South Cambridgeshire District is based on a reasoned judgement of the available evidence and is acceptable.

Issue 3 – Whether there is a reasonable prospect of a five-year supply of deliverable sites on adoption, and whether the policies and allocations in the Plan will ensure that the housing requirement is met.

Housing requirement

38. The submission draft plan seeks to meet the OAHN, identified in the SHMA, of 19,000 new homes over the Plan period. Following the further work on OAHN which identified a figure of 19,337 the Council decided to revise the housing requirement in the Plan to 19,500 new homes. Rounding the figure upwards provides a degree of flexibility. **SC3, SC12, SC18** insert the revised figure into the Plan to ensure it is justified and effective. This implies an annual delivery rate of 975 homes per year.

Buffer

39. In their statement for Matter 8, the Councils provided information on housing completions compared with the targets set out in the adopted development plans for the years 1999/2000 to 2013/2014. 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 only twice. The reasons for the failure to deliver housing at the required rates will include factors beyond the Council's 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 at this point should be 20%.

Shortfall

40. There has been a shortfall in housing delivery since the start of the plan period of 1,880 up to 31 March 2017. There are two generally recognised approaches to dealing with this undersupply: either within the next five years (known as the Sedgefield method), or over the remainder of the plan period

(the Liverpool method). The PPG advises that local planning authorities should aim to deal with any undersupply within the first five years of the plan period 'where possible'.

41. The Local Plan is reliant on two new settlements at Waterbeach and Bourn to deliver a significant proportion of the housing requirement. Both sites require significant investment in infrastructure and, realistically, may not start to deliver new housing until the mid or later years of the plan period. If the Sedgefield method were to be used it would almost certainly result in increased pressure to develop new housing in the rural areas which are a lower tier in the Sustainable Development Strategy. In the circumstances, the use of the Liverpool method is justified.
42. In summary therefore, the housing requirement is 975 dwellings per annum (dpa) which equates to 4875 over a 5 year period. Added to this is the shortfall spread over the remainder of the plan period ($1880/14 = 134 \text{ dpa} \times 5 = 671$) ($4875 + 671 = 5546$); and the 20% buffer ($5546 \times 0.2 = 1109$), giving a total of $5546 + 1109 = 6655$ at this point. The number in the Council's Figure A2 differs slightly (6656) due to the way the calculations have been rounded.

Use of joint trajectory

43. During the Examination the District Council, together with Cambridge City Council, prepared a Memorandum of Understanding (RD/Strat/350) which advocates the use of a joint housing trajectory for the two authorities. The foundation for the Cambridge City Local Plan and the South Cambridgeshire Local Plan is the Sustainable Development Strategy Review, as discussed under issue 1 above. Although a joint plan has not been prepared the two plans are both based on the SDSR, as explained above. In the early years of the Plan period, the majority of development in sites on the edge of Cambridge is likely to take place within the administrative area of the City whereas in the later years of the plan period most development will take place within South Cambridgeshire, including at the new settlements. The Memorandum of Understanding will therefore assist in securing sustainable development in accordance with the SDSR.
44. Planning Practice Guidance Ref 010 2a-010-20140306 advises: *Where there is a joint plan, housing requirements and the need to identify a five year supply of sites can apply across the joint plan area. The approach being taken should be set out clearly in the plan.* The use of the joint trajectory across the two plans will be a temporary measure until a joint local plan is prepared (see issue 17), which will bring the situation fully into line with PPG. In all the circumstances, this is a reasonable approach.
45. **SC4, SC28, SC30 – SC33, SC35, SC36** and **SC273** are necessary to establish the approach to calculating the five year housing land supply which will be used and to confirm the housing land supply position in November 2017. This will ensure that this part of the Plan is effective and consistent with national policy.

Components of supply

46. Figure A6, which is included in **SC273**, sets out the components of supply and the expected rates of delivery. We consider the main components of supply

(sites on the edge of Cambridge and new settlements) in more detail elsewhere in this report but the Council's assessment of supply is reasonable and evidence-based. Taking account of all forms of housing supply, comprising completions in the first years of the plan period, new and existing allocations and an allowance for windfall sites, the Plan makes provision for over 23,500 new dwellings. This is above the housing requirement figure of 19,500 new homes and therefore allows a significant degree of flexibility. The fact that some 15,000 of these new dwellings will be provided from the early completions, existing allocations and sites with planning permission, gives confidence that the housing requirement will be met.

Conclusions

47. Subject to the inclusion of the MMs identified, we conclude that there is a reasonable prospect that the Plan will provide for a five year housing land supply on adoption and that the housing requirement will be met.

Issue 4 – Is the Plan consistent with national policy in its approach to the Green Belt? Are the allocations of Green Belt land justified by exceptional circumstances? Should other Green Belt allocations be made?

Purposes of the Green Belt

48. Paragraph 80 of the Framework sets out 5 purposes of the Green Belt. Paragraph 2.29 of the Plan sets out three Cambridge Green Belt purposes: to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre; to maintain and enhance the quality of its setting; and to prevent communities in the environs of Cambridge from merging into one another and with the city. It is not the role of the Local Plan simply to reiterate national policy. It can, however, interpret national policy in a local context. The Cambridge Green Belt purposes reflect the importance of Cambridge as a historic city and the particular role of the Green Belt in preserving its setting. The Cambridge purposes have been included in previous development plans including the Cambridgeshire and Peterborough Structure Plan 2003 and the South Cambridgeshire Core Strategy (2007). In any event, the national Green Belt purposes can be taken into account, where relevant in the context of any specific proposal. In our view the Cambridge Green Belt purposes are not inconsistent with national policy and the Plan is sound in this respect.

Development Management in the Green Belt

49. Policy S/4 establishes the overall approach to the Cambridge Green Belt within South Cambridgeshire. **SC9** is necessary to establish that the new development will only be permitted in accordance with the NPPF.
50. Policy NH/8 of the LP requires that development proposals *outside but in the vicinity of the Green Belt* (our emphasis) should not have an adverse effect on the rural character and openness of the Green Belt. We can find no support for this approach in the Framework. **SC161** is therefore necessary to ensure consistency with national policy.
51. **SC162** is necessary to clarify that there are no villages in the Cambridge Green Belt, as each is an 'island' inset within it, and to ensure the Plan is

effective. **SC163** is necessary to ensure that the Plan is consistent with paragraph 87 of the NPPF in relation to inappropriate development in the Green Belt. **SC166** and **SC167** are necessary to ensure consistency with paragraphs 81 - 89 of the NPPF in relation to new facilities for outdoor sport and recreation. **SC164** and **SC165** are necessary to reflect the NPPF approach to previously developed sites and infill development in the Green Belt.

Green Belt Review

52. Significant tracts of land were taken out of the Cambridge Green Belt in the South Cambridgeshire Local Development Framework Documents (2007 – 2010) at sites on the edge of the City. These sites are now being developed and will contribute to the delivery of new housing in the early years of this plan period.
53. It was suggested, by some representors, that there may be areas of previously-developed land within South Cambridgeshire, which had not been identified in the SHLAA, which could be allocated for development to avoid the need to release land from the Green Belt, but no specific sites were identified. The District is a rural area under significant development pressure and we find it highly unlikely that there are a significant number of previously developed sites which have been overlooked through the SHLAA process.
54. Having regard to the overall spatial strategy and the finding of the SDSR that the edge of Cambridge is the second most sustainable location for growth in the Greater Cambridge area, the Council, together with Cambridge City Council, undertook a further review of land in the Cambridge Green Belt with a view to establishing whether any land could be released from the Green Belt without significant harm to the purposes of the Green Belt. The review focused on areas close to the inner Green Belt boundary which therefore had most potential for development in line with the SDSR. The Cambridge Green Belt extends beyond the area studied in the review.
55. The review identified a limited number of sites that could be released from the Green Belt, which we comment on below. The review assessed parcels of land in the Green Belt and scores their importance on a scale of 'low', 'medium' and 'high' with respect to the Green Belt purposes of setting, character and separation. An overall score of importance to Green Belt is then given for each parcel of land. As we set out in our initial findings of May 2015 (RD/GEN/170) we found it difficult, in some cases, to understand how the overall score for importance to Green Belt had been derived from the individual scorings for setting, character and separation. In response to our concerns, the Councils commissioned an independent assessment of the Inner Green Belt boundary. This study (CIGBBS) (RD/MC/030) found that the great majority of the land within the Cambridge Green Belt was assessed as being important to Green Belt purposes and in broad terms confirmed the overall findings of the Councils' 2012 review.
56. A number of criticisms were made of both the Councils' 2012 review and the later assessment, including the identification of areas for assessment, and whether the identification of the qualities/assessment criteria against which the different areas were assessed.

57. Both the Councils' Review and the CIGBBS identify areas for assessment as sectors and subsectors. The sectors were broadly defined using the main radial routes and other features such as the river. The sectors were then divided into subsectors where there were clear changes in the characteristics of the land. It was argued by some that a much finer grain should have been used. However, the nature of the purposes of the Green Belt, including preventing urban sprawl and the merging of settlements require assessment at a broad scale. We consider that the methodology employed is based on a reasoned judgement having regard to physical features and landscape characteristics and is a reasonable approach to take.
58. There is no widely accepted methodology to guide the way in which assessments of the Green Belt should be carried out, although the Planning Advisory Service (PAS) document *Planning on the Doorstep: The Big Issues – Green Belt (RD/Strat/460)* advises that '*Any review of Green Belt should involve an assessment of how the land still contributes to the five purposes*', although the document accepts that Green Belt purpose 5 '*to assist in urban regeneration.....*' is likely to apply equally to all land within the Green Belt, and the value of different land parcels is unlikely to be distinguished by application of this purpose. The 16 qualities/assessment criteria used in the LDA study draw on the other 4 national purposes and the Cambridge Green Belt purposes in identifying factors which are particularly important for the City and its surrounding landscape. In general terms, we find the CIGBBS to be a robust approach which follows the PAS good practice advice, although for the reasons given below we disagree with its conclusions regarding policy E/2. **SC5** and **SC10** are necessary to update the text of the Plan to reflect the additional work undertaken on the Green Belt Review, and other matters. We have made minor amendments to the wording of **SC10** to avoid confusion bearing in mind our conclusions on policy E/2.

Green Belt allocations

59. The Plan proposes to release a limited number of sites from the Green Belt. These are: a site between Huntingdon Road and Histon Road as an extension to the urban extension which is currently being developed; a site on Fulbourn Road as an extension to the Peterhouse Technology Park; and sites for residential development in Sawston, Comberton and Impington.
60. More detailed consideration is given elsewhere in this report to the issue of whether exceptional circumstances exist to justify the alterations to the boundary of the Green Belt but, in summary, we find that these allocations are sound.

Should any further changes be made to the Green Belt to allocate land for development?

61. A number of sites have been promoted for development, by some representors, on the edge of Cambridge in the Green Belt. These sites straddle the boundary of the City and South Cambridgeshire District and were referred to as: Land to north of Barton Road, proposed as a sustainable urban extension for 1,450 new homes and associated facilities and services; Land at Grange Farm, proposed for 400-500 new homes and open space/sports use; Cambridge South, promoted for employment-led mixed use development; and

Cambridge South East (initially proposed as a site for the development of 3,500 to 4,000 dwellings with associated services and facilities, but also as a smaller site for up to 1,200 dwellings and a primary school); Land at Fen Ditton, proposed for residential-led mixed use development to provide 400-500 new homes; Land West of Hauxton Road, Trumpington, which is promoted as a site for housing and sports uses or simply housing. In the light of our findings relating to the spatial strategy and the assessment of housing, employment and other needs, and the overall supply of land to meet that need including sites outside the Green Belt, we conclude that the Plan is sound without the allocation of additional sites in the Green Belt.

Conclusions

62. Subject to the inclusion of the MMs identified, we find that the Plan is consistent with national policy in its approach to the Green Belt, that the allocations in Green Belt are justified by exceptional circumstances, and that there is no justification for the allocation of additional sites for development in the Green Belt.

Issue 5 – Whether the Strategic Allocations on the edge of Cambridge will deliver sustainable development to meet identified needs

63. A significant proportion of the overall housing requirement will be provided in the major allocations carried forward from the Core Strategy and AAPs for North West Cambridge, Cambridge Southern Fringe and Cambridge East. These are large sites which straddle the boundary of South Cambridgeshire and Cambridge City.

Land between Huntingdon Road and Histon Road

64. Land was taken out of the Green Belt in the South Cambridgeshire Site Specific Policies DPD to provide an urban extension to Cambridge. Policy SS/2 of that Plan makes provision for the development of approximately 1,000 new dwellings in South Cambridgeshire. This Local Plan proposes a minor realignment of the Green Belt boundary along the northern edge of the MDS. This will marginally decrease the separation of the MDS from the A14 but will make no appreciable difference to the perception of the City and its setting, nor to the separation between the City and the villages of Girton and Histon and Impington, or the separation between the villages. The land to be released from the Green Belt will allow for approximately 100 dwellings to help meet the OAHN in a very sustainable location on the edge of Cambridge. In the circumstances we consider that the very limited harm to the Green Belt is outweighed by the benefits of the provision of new dwellings in a sustainable location, thus amounting to the exceptional circumstances necessary to justify an alteration to the boundary of the Green Belt. The Council has proposed a number of MMs (**SC42-54**) which will, generally, provide greater flexibility in relation to the number of houses to be provided through a design-led approach, and regarding the achievement of sustainable patterns of travel. **SC67** updates the illustrative diagram in the Plan. These MMs are necessary to ensure the Plan is effective.

Cambridge East

65. This strategic site is already the subject of an AAP which was jointly adopted in 2008 by Cambridge City Council and South Cambridgeshire District Council. The AAP remains extant after the adoption of this Plan subject to the policies identified as being superseded in proposed Appendix Ba (**SC274**). This MM, which also applies to the adopted AAPs for Northstowe and Cambridge Southern Fringe, is necessary to ensure clarity, effectiveness and compliance with the Regulations. The Cambridge East AAP allocates land in South Cambridgeshire and the City for between 10,000 and 12,000 new homes. The development was contingent upon the relocation of Marshall Aerospace. In 2010 Marshalls found that they did not have an appropriate site for relocation. The submission draft plan only allocates those parts of the site which were considered to be capable of development whilst the airport remains in operation.
66. During the course of the examination, however, the intentions of the landowners have been clarified and it has been established that additional areas of land can be developed during the plan period. **SC55** provides a revised text for the policy which reflects the most up-to-date expectations regarding delivery of development during the Plan period having regard to the continued use of Cambridge airport, and **SC69** updates the illustrative diagram in the Plan. These MMs are necessary to ensure that the Plan is effective in bringing forward comprehensive development on this sustainable site on the edge of Cambridge, and to ensure consistency with the emerging Cambridge Local Plan 2014.
67. The numbers of dwellings in the policy are approximations and Policy CE/10 of the AAP requires adequate highway capacity to serve all stages of the development. This AAP policy is wide ranging and includes primary road access, managing traffic impacts through Transport Assessments, and contributions in respect of capacity on existing orbital routes related to the volume of traffic generated by Cambridge East on those routes. The policy addresses the need for the provision of a new secondary school, and other infrastructure to support the development.

Cambridge Northern Fringe East

68. Policy SS/4 sets the context for development of the strategic site that lies within South Cambridgeshire. The quantum, phasing and other details of development will be established through the joint preparation of an AAP with the City Council. **SC56 – SC66** and **SC70** reflect the most up-to-date position which is also consistent with the emerging Cambridge City Local Plan 2014, and will ensure the policy is effective. We have made a minor amendment to the wording of **SC62** to clarify the way in which applications submitted before the adoption of the AAP will be considered as the Council has no control over the making of planning applications, only the way in which it deals with them. We have also made minor amendments to **SC65** to ensure flexibility and effectiveness.

Conclusion

69. The strategic sites on the edge of the Cambridge urban area, will provide sustainable development to help meet identified needs, particularly for new housing.

Issue 6 – Whether the proposed new settlements will deliver sustainable development to meet identified needs

Waterbeach

70. Policy SS/5 allocates land at the former Waterbeach Barracks and adjoining land to the east and north for a new town of 8,000 to 9,000 dwellings. The former barracks site is one of very few substantial areas of previously developed land in South Cambridgeshire and therefore a significant development opportunity. The inclusion of adjoining land is necessary to achieve a settlement of a size which can sustain local services and facilities and make a significant contribution to meeting housing need in the District. The Council accepts that the capacity of the site was derived from the high level assessment in the SHLAA, and that it can only be regarded as an approximation.
71. The policy envisages that the development of the site will be guided by the preparation of an Area Action Plan. During the course of the Examination the Council received legal advice that the matters intended to be included in the second tier of planning documents for both Waterbeach and Bourn new settlements should, as a matter of law, be prepared as a Supplementary Planning Document (SPD). We have no reason to dispute this advice. A number of MMs are necessary to reflect this change and to include the most up-to-date position (**SC71 – SC74, SC76 – SC92, SC215**).
72. The policy, as submitted, envisages that development will be phased with no more than 1,400 dwellings to be completed by 2031. The Council has proposed to delete this restriction. Whilst we think that the Council is correct to assume a modest delivery rate for the purposes of the housing trajectory, there is nothing to be gained by phasing development if the necessary infrastructure can be put in place at an earlier date. **SC22, SC29, SC75** and **SC19** will provide greater flexibility in accordance with the requirements of the NPPF.
73. The policy recognises the need to protect the settings of listed buildings near the site, including Denny Abbey which is also a scheduled monument. Following consultation with Historic England, the Council is proposing a revised northern boundary to the site. An amendment to the policies map is necessary to protect the setting of Denny Abbey and ensure consistency with the NPPF, which requires heritage assets to be conserved.
74. The submission plan sought to allocate land between the proposed new settlement and the existing Waterbeach village as an extension to the Cambridge Green Belt. Shortly after the Plan was submitted for examination, planning permissions were granted, at appeal, for residential development on these sites. **SC11** and **SC72** and the amendments to the policies map are necessary to reflect this reality. We agree with the view of the appeals

Inspector that it is not necessary to extend the Green Belt to meet the objective of maintaining the separate identity of the existing village.

75. We are mindful of the concerns expressed by local residents and others in relation to a range of issues including: the effect on A10 trunk road, which is already operating at capacity; the impact on the existing village of Waterbeach; and the potential inconvenience of relocating the existing train station to the new town. All these issues are recognised in the policy and the SPD may provide further guidance. However, we are not persuaded that there are any overriding constraints that cannot be satisfactorily resolved. The review of the Plan (see issue 17 below) will provide an opportunity to assess progress.

Bourn Airfield

76. Policy SS/6 allocates land at Bourn Airfield, shown on the policies map as a Major Development Site (MDS), for the development of a new village of approximately 3,500 dwellings.
77. Bourn Airfield was a World War II airfield. Since it closed as a military airfield a low level of aviation activity has continued with use by a private flying club. There is also some employment related activity on the site but the majority of the site has been in agricultural use for many years. There are some remnants of the former airfield use, but the extent to which the site can be regarded as previously developed land is disputed. However, the rural nature of South Cambridgeshire means that, apart from the former barracks at Waterbeach, no other sites have been identified with a greater proportion of previously developed land which are available or suitable to accommodate development of this scale.
78. The SHLAA and SA considered potential alternatives to the development of Bourn Airfield, including an area of land to the north of the A428, referred to for the purposes of the examination as Harborne. A number of planning constraints to the development of the Harborne site were identified including the proximity of sites of national and local nature conservation importance and its separation from Cambourne by the dual carriageway A428. The promoter of the site argues that the perceived constraints could be mitigated and we accept that acceptable mitigating measures, including new physical infrastructure, may overcome a number of the identified constraints. However, the site is in an elevated location which is part of an attractive open and rolling landscape. Development on the site would be highly visible when viewed from surrounding roads and villages. Even with the incorporation of open space, landscaping and other mitigation measures, development of the scale proposed on this site would have a significant adverse impact on the attractive rural landscape. The site promoter argues that the Council's sustainability appraisal and comparison with Bourn Airfield is defective. There is an element of judgement which has to be exercised in carrying out the SA, and we find the Council's overall approach to be reasonable. In any event, it is our view that the adverse landscape impact of this proposal outweighs any other considerations including the potential of the site to deliver a Park and Ride site.

79. Some respondents suggest that the development proposed for Bourn Airfield could be better accommodated as a further extension to Northstowe. The Plan already allocates the 'reserve' land included in the adopted Northstowe AAP and there is no evidence before us that land outside the AAP is available or developable.
80. The policy envisages that the development of the site will be guided by the preparation of an Area Action Plan. As indicated above in relation to Waterbeach, the Council received legal advice that the matters intended to be included in the second tier of planning documents should, as a matter of law, be prepared as SPD. A number of modifications (**SC93, SC95 - SC109, SC215**) are necessary to reflect this change, including an increase in the site area to be addressed through the SPD. However, this would not necessarily mean an increase in the area covered by built development. We agree that the inclusion of an existing employment site in the Major Development Site will allow for a comprehensive approach to development of the new settlement.
81. Concerns have been expressed that the proposed development of Bourn Airfield would lead to a coalescence of development south of the A428 from Highfields Caldecote through to the development at West Cambourne which has recently been granted planning permission. Development on the scale proposed at Bourn Airfield will inevitably change the character of the area but the policy requires measures to address landscape and townscape issues and to avoid the impression of ribbon development south of the A428. We are aware that proposals for development at Bourn Airfield have been previously rejected by Planning Inspectors expressing concerns about whether the size of the site would allow sufficient room to give adequate separation from Highfields Caldecote (RD/EX/120). This judgement, however, was made in 1992, in the context where a preferable option, the land now developed as Cambourne, was available.
82. The Local Plan sets the framework for considering development proposals which will be expanded upon in the SPD. On the basis of the information before us, including the latest iteration of the Masterplan, we consider that there is a reasonable prospect that a satisfactory form of development can be achieved through a design led approach which may include residential densities higher than those in some of the existing villages. It is not intended that the Bourn Airfield development will be created as a wholly self-contained settlement. The proximity of the site to Cambourne offers opportunities for interaction recognised that Cambridge will continue to be the major source of employment opportunities for residents between the settlements in relation to the provision of services and facilities. It is also of the new settlement.
83. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) recognises that the A428/A1303 corridor is subject to congestion and proposes a high quality public transport route to serve the Bourn Airfield and Cambourne West proposals. Policy SS/6 recognises the need for on and off-site infrastructure provision to mitigate the impact of the development on the highway network. The infrastructure Delivery Study 2015 (RD/MC/080) and the Local Plans Viability Update (RD/MC/090) consider infrastructure needs for this site and, taking into account viability, conclude that there will be sufficient developer funding available to deliver on site infrastructure requirements and to make a contribution to off-site infrastructure. It is also envisaged that the

Greater Cambridge City Deal which has secured £100 million as the first five year tranche of funding with two further five year tranches of up to £200 million, will contribute to delivering sustainable transport infrastructure including the improvements to bus services in the A428 corridor.

84. At the time this matter was considered at the examination, a certain amount of work had been undertaken investigating options for what is known as the Cambourne to Cambridge Better Bus Journeys project, but no clear route alignment had been confirmed. It is fair to say that the scheme is still at an early phase of development, but the City Deal Executive Board allocated £59 million towards the eastern section of the scheme in January 2015, and we consider that there is a reasonable prospect that the scheme will be completed during the Plan period.
85. Policy SS/6 seeks to phase development at Bourn Airfield, so that the first housing completions will come forward in 2022, with no more than 1,700 dwellings being completed by 2031. Whilst we think that the Council is correct to assume a modest delivery rate for the purposes of the housing trajectory, there is nothing to be gained by deliberately phasing development if the necessary infrastructure can be put in place at an earlier date. The removal of phasing requirements for both Bourn Airfield and Waterbeach new settlements will introduce greater flexibility into the development strategy of the Plan (**SC19, SC29, SC34** and **SC94**) are therefore necessary to ensure flexibility and deliverability.
86. Concern about flooding is also raised. The site lies within Flood Zone 1 which indicates a low risk of flooding and policy SS/6 together with other policies in the Plan provides an appropriate framework for the consideration of surface runoff and foul drainage.
87. We are mindful of the significant levels of opposition to the Bourn Airfield proposal expressed by the local community and others, including fears of coalescence and traffic implications, including local traffic management issues relating to the Broadway. There is a degree of scepticism from the local community about whether their concerns can be adequately addressed. But there is nothing to indicate that these concerns cannot be satisfactorily addressed through the development management process and further guidance provided by SPD. The review of the Plan (see issue 17 below) offers an opportunity for the proposal to be reviewed in the light of the further work that will have been completed at that time.

Northstowe

88. The New Settlement of Northstowe is currently under construction in accordance with the Northstowe Area Action Plan (AAP). Policy SS/7 of the Local Plan allocates the reserve land included in the AAP as an extension to the new town, to provide flexibility for the delivery of the new development. The Plan refers to a total of 9,500 new homes to be developed at Northstowe, whereas the AAP sets a target of 10,000 new homes as a reasonable expectation. **SC110** which amends the figure in the Local Plan to 10,000 homes is therefore necessary to ensure consistency with the AAP which is also part of the development plan.

Cambourne West

89. Following the submission of the Local Plan the Council resolved to grant planning permission for a mixed use development including 2,350 new homes on a site which includes, but is larger than the allocation in policy SS/8. The fact that a different proposal has been granted permission does not necessarily make the allocation in the submission plan unsound. **SC22** and **SC114** make reference to the planning permission and **SC111** and **SC112** clarify the approach to be taken to footpaths and drainage. These MMs are necessary for clarity and effectiveness but we are not persuaded that the modification proposed to distinguish between the village and Parish of Caxton is necessary for soundness.

Conclusion

90. The proposals for Northstowe and Cambourne West are well advanced and highly likely to make a significant contribution to meeting development needs, particularly for housing, during the plan period. The proposals for Waterbeach and Bourn Airfield raise a number of issues, particularly in relation to the provision of new infrastructure. Work is underway, however, to address these issues. The review of the Plan offers an opportunity to opportunity to consider progress towards ensuring that the requirements of the policies can be met, particularly in relation to sustainable transport measures. On the basis of the evidence before us, we conclude that there is a reasonable prospect that the new settlements will deliver sustainable development to meet identified needs during the plan period.

Issue 7 – Development in the rural area

Village Hierarchy and development limits

91. The Council's methodology for classifying villages into the Plan's hierarchy of Rural Centres, Minor Rural Centres, Group Villages, and Infill Villages is set out in the South Cambridgeshire Village Classification Report 2012 (RD/Strat/240) Representations were made in relation to a number of villages, suggesting that they had been incorrectly classified. The classification report, which is supplemented by the Village Services and Facilities Study 2014 (RD/Strat/250) together provide a comprehensive evidence base on which to base the judgements necessary to allocate individual villages to a specific level in the hierarchy. Individual components of that analysis may change over time but it is not practical to update the analysis on a rolling basis. Having reviewed the evidence base, the Council is proposing to add Streetly End to the list of infill villages (**SC27**), we are satisfied that this is a reasoned judgement and that the hierarchy set out in the plan is justified and effective.

Development frameworks

92. We have reviewed the Council's approach to determining the development framework boundaries which is summarised in paragraph 2.49 of the Plan. We consider it to be a robust methodology for defining the boundaries which assist in the implementation of policies designed to guard against the development of isolated dwellings or incremental growth in unsustainable locations. A

number of representors sought changes to the development framework boundaries for individual settlements, most commonly to seek inclusion of additional land within the boundaries. With the exception of the site at Sawston/Pampisford (see below), we are satisfied that the Council applied its stated methodology in a consistent and reasonable manner and no changes to the development framework boundaries are necessary to ensure the soundness of the Plan.

93. Policy S/7 resists development outside village framework boundaries and we consider this to be justified to avoid development in unsustainable locations. The limits on the scale of development in minor rural centres, group villages and infill villages set out in policies S/9 – S/11 are necessary for the same reason. The most appropriate way to provide for local needs on sites which have the support of the local community is through the preparation of Neighbourhood Plans. In this context, **SC23** and **SC24** are necessary to ensure flexibility to enable Neighbourhood Plans to make allocations outside the development frameworks, in a way which is in general conformity with the Local Plan.
94. In some cases, changes to the development framework boundaries and/or the Green Belt boundary were sought to avoid undue restrictions on the growth of local businesses. However, there are many employment uses and businesses which happen to be located in the Green Belt and these circumstances would not constitute the exceptional circumstances necessary to alter the Green Belt boundary.

Land at London Road, Sawston

95. This employment site is shown in the submission policies map 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 it 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. **SC26** which includes the site within the Rural Centre of Sawston is therefore necessary to ensure the Plan is justified and effective.

Residential development in the villages and the rural area

96. Policy H/1 makes allocations for residential development at Sawston, Histon and Impington, Melbourn, Gamlingay, Willingham and Comberton.
97. Allocation H/1:a relates to Dales Manor Business Park in Sawston. **SC177** adds an additional development requirement that the tree belt and hedges on the south-west part of the site should be retained except as necessary to

provide access. This MM is necessary to ensure an acceptable relationship with existing residential development and the effectiveness of the Plan.

Sites in the Green Belt

98. Sawston is one of the largest and most sustainable villages in the District with good transport links to the City. The Plan seeks to remove two sites on the east of the village from the Green Belt on either side of Babraham Road and allocates them for residential development (sites H/1:b and H/1:c). The two sites are currently fields in arable use. As the sites are on the edge of the village they are some distance from the facilities and services available in Sawston, but generally within 2km which is a reasonable distance for cycling.
99. The development of these two arable fields would have a negative impact on the purposes of the Green Belt as it would result in encroachment into the countryside but this impact is mitigated to some extent by the relatively small size of the sites which have a combined area of 15.28ha. Development of these sites would also result in a minor reduction in the separation between Sawston and Babraham. However, the eastern edge of Sawston is currently a hard urban edge. Development of these sites incorporating a significant landscape buffer along the eastern boundaries of both sites and the southern boundary of site H/1:c, as required by the policy, offers the opportunity to provide a softer green edge to the village.
100. These sites are good quality agricultural land but that applies to much of the District and the use of such land is necessary if the housing requirement is to be met. Issues relating to infrastructure provision including school capacity and highway works are capable of resolution through the development management process.
101. In all the circumstances we conclude that the limited harm to the Green Belt is outweighed by the provision of 340 new dwellings in a sustainable location and the opportunity to improve the character of the Green Belt boundary, thereby comprising the exceptional circumstances necessary to justify the alterations to the Green Belt boundary.
102. A site north of Impington Lane, in Histon and Impington, is proposed to be taken out of the Green Belt and allocated for residential development with an indicative capacity of 25 dwellings. The site is currently open land on the edge of the village and adjoins new residential development to the west. Inappropriate development is, by definition, harmful to the Green Belt and in this case, there would be some encroachment into the countryside. Development of this site would, however, have a very limited impact on the setting and special character of Cambridge due to its size and relative degree of containment by existing development to the south and west. Development in accordance with policy H/1:d, offers the opportunity to create a landscape buffer to provide a softer green edge to the village. Histon and Impington is a rural centre and one of the most sustainable villages in the District. The site lies within easy reach of the shops, schools and other services that the village has to offer. This location is also close to good public transport links with the City. We conclude that the limited harm to the Green Belt is outweighed by the provision of 25 new dwellings in a highly sustainable location, thereby constituting the exceptional circumstances necessary to justify the alteration

to the boundary of the Green Belt. Access to the site has been raised as a constraint to development but the County Council, as Highway Authority, has confirmed that there are no insurmountable problems which cannot be dealt with through the development management process and through the use of its powers under the Highways Act 1980.

103. The allocation within the Green Belt at Comberton (H/1:h) is an open field on the edge of Comberton which is designated as a Minor Rural Centre. The site is designated for development with an indicative capacity of 90 dwellings to include affordable housing provision to help meet the needs of the villages of Comberton and Toft. There is no evidence before us that sites outside the Green Belt are available in a suitable location to meet these locally identified needs. The policy also requires the provision of community facilities including a football pitch and changing facilities for Toft and community car parking which would also be available as overspill parking for Comberton Village College.
104. Inappropriate development is, by definition, harmful to the Green Belt and in this case development of the site would reduce the separation between Comberton and Toft, although it would not extend built development further west than the existing built development to the north of the site. The site is surrounded by mature hedgerows and trees which would help to limit the impact of development. Considered in the round we consider that the impact of the proposed development would have a moderate impact on the Green Belt that would be outweighed by the benefits of the provision of new housing and in particular affordable housing to meet local needs as well the provision of other community benefits, thereby constituting the exceptional circumstances necessary to justify an alteration to the boundary of the Green Belt. The site received outline planning permission during the course of the examination.

Other sites and policies for the rural area

105. The sites allocated for development in Melbourn and Willingham have had planning permission granted, as has a large proportion of the site at Gamlingay. The Council's proposed MM SC178 makes minor wording changes intended to ensure internal consistency in the policy. This would improve the Plan, but the intent of the Policy is clear and we do not consider the MM to be necessary for soundness.
106. In some cases, sites outside the development frameworks have been put forward by representors as being necessary to meet general housing need, or local needs. In response to requests from Parish Councils, the Council has sought the inclusion of sites at Great Abington, Little Abington and Graveley and has proposed the inclusion of these sites through MMs SC179 and SC180. However, we do not consider that the Plan can be found unsound because of a failure to allocate small sites in locations that are relatively unsustainable, in accordance with the SDSR, when the Plan already allocates sufficient land to meet the OAHN. As indicated above, the appropriate place to make such allocations is through the preparation of a Neighbourhood Plan or the review of the Local Plan.
107. **SC181** provides a listing of allocated sites which have received planning permission and is necessary for clarity. We have, however, removed the

reference to the site in Great Abington which, as a result of our conclusion above will not be a site allocated in this Plan. The appropriate place to consider revisions to development framework boundaries in the light of all permissions granted is through the review of the Plan.

108. Policy H/2 allocates the Bayer CropScience site in Hauxton for residential-led mixed-use development. **SC183** amends the wording of the supporting text to ensure consistency with paragraph 89 of the NPPF.
109. Policy H/4 guides proposals on the former Fen Drayton Land Settlement Association Estate. The policy requires residential buildings to achieve Level 6 of the (now withdrawn) Code for Sustainable Homes (CSH). The Council has proposed modifications (**SC184**, **SC185** and SC186) to delete references to CSH. However, the wording of MMs **SC184** and SC186 include a requirement for new dwellings on the site to be carbon neutral. This is not consistent with national policy and we have amended the wording of **SC184** and deleted SC186. **SC187** indicates that a SPD will be provided and this is necessary to ensure the policy is effective.
110. Policy H/5 makes it clear that windfall residential development will not be permitted south of the A1307 at Linton on the grounds of highway safety. The A1307 is a major transport route with a high casualty record despite the presence of a pelican crossing and a reduced speed limit. Windfall residential development will not therefore be sustainable due to the inadequate access to the village facilities and services which are to the north of the A1307.
111. As part of the Greater Cambridge City Deal, the partners have committed to delivering 1,000 additional new homes on rural exception sites by 2031. **SC39** clarifies the relationship between that commitment and delivery of the Local Plan housing requirement. The MM specifies that only once delivery exceeds the level needed to meet the requirement of this Plan and the emerging Cambridge City Local Plan will new dwellings, which meet the criteria specified by the Greater Cambridge City Deal Board, be counted towards the delivery of the City Deal commitment. This MM is necessary for clarity and effectiveness.

Issue 8 – Whether the Plan will deliver a wide choice of high quality homes, consistent with national policy.

112. Policy H/8 aims to provide a wide choice, type and mix of housing. This accords with the aspirations of paragraph 50 of the NPPF. **SC188**, **SC189**, **SC191** and **SC192** introduce references to the provision of starter homes and people wishing to build their own homes. This is necessary to ensure consistency with PPG. We have made a minor addition to the wording to include a reference to the private rented sector which is also referred to in PPG (Ref ID: 2a-021-20160401). Although the revised policy does not specify the number of plots that should be available for sale to self and custom builders, there is not at present a sufficient evidence base to justify it. Should that position change, it is a matter that can be addressed through the review of the Plan.
113. Section 3 of the policy refers to the (now withdrawn) Lifetime Homes standard. **SC190** replaces this with a requirement that 5% of homes should

be built to the accessible and adaptable dwellings M4(2) standard, to be split evenly between market and affordable housing. The Council's evidence shows that about 40% of households in Council housing include someone with a disability. The Cambridge and South Cambridgeshire Local Plans Viability Update (2015) (RD/MC/090) found that the proposed requirement for 5% would have a marginal impact on viability. There is therefore a local justification for the revised policy in accordance with the requirements of PPG and the MM is necessary to ensure consistency with national policy by the removal of the Lifetimes Homes standard. The Council's proposed MM **SC193** to paragraph 7.28 seeks to set a different requirement, that 5% of private new homes on sites of 20 or more dwellings should be built to the M4(2) standard. If this MM, as proposed, were to be included there would be a confusing difference between the policy and its supporting text. Our recommended MM removes reference to the Lifetimes Homes standard but does not set a different requirement from the modified policy H/8.

114. Policy H/9 requires all developments which increase the net number of homes on a site by 3 or more to provide affordable housing. For the reasons given in our interim findings (RD/GEN/390) **SC194** and **SC195** are necessary to increase the threshold to ensure conformity with national policy which requires that affordable housing should not be sought from developments of 10 units or less.
115. Policy H/10 seeks to enable the provision of affordable housing to meet identified local housing needs on sites adjoining development framework boundaries (rural exception sites). **SC196** adds a further sentence to Section 1d to allow Mortgagee in Possession (MiP) clauses where it can be demonstrated that this is necessary to enable development to proceed. Housing Associations borrow funds from the private finance market in order to deliver new affordable homes. However, lenders are becoming increasingly risk averse. A MiP clause in a Planning Deed entered into accordance with section 106 of the Town and Country Planning Act 1990 provides a means of overcoming the concerns of private market lenders in this regard.
116. **SC197** allows for the provision of some market housing where this would facilitate the delivery of significant affordable housing and **SC198** simplifies the requirements for demonstrating that market housing may be required for viability reasons. These MMs introduce a degree of flexibility to ensure the plan is effective.
117. Policy H/11 relates to residential space standards. The Written Ministerial Statement (25 March 2015) introduced new optional space standards for dwellings. Planning Policy Guidance (PPG) ID: 56-019-20150327 indicates that local planning authorities which are seeking to require an internal space standard should include a policy in their Local Plan referring to the standard. In order to justify the requirement, account should be taken in respect of the need, viability and timing.
118. The Council has produced a document entitled "Evidence for Residential Space Standards in South Cambridgeshire" [ERSS] (RD/H/810). The policy as originally drafted related to the Homes and Communities Agency (HCA) space standards for affordable homes.

119. The ERSS has considered all of the three criteria in the WMS. The Council has measured the gross internal area, bedroom sizes, built-in storage space, and ceiling heights of 115 new homes across 36 approved developments within the district. Those developments included schemes of 2 or more dwellings on the edge of Cambridge, at new settlements, and within or on the edge of a variety of villages across the settlement hierarchy.
120. The majority of new homes did not meet the national space standards in terms of floorspace of single bedroom(s) and built-in storage requirements for the whole dwelling. 54% of single bedrooms were smaller than the standard and 55% of all dwellings had less built-in storage for the whole dwelling. Given these shortfalls, there is therefore a sound basis for adopting the standards on the ground of need.
121. The study also considered the implications of requiring the national space standards on viability. It concluded that if the previously recommended affordable housing policies and CIL rates are maintained, alongside the inclusion of optional elements of national strategy (e.g. the space standards) viability would not jeopardize development coming forward across the City or district.
122. In the circumstances we conclude that the introduction of the national space standards is justified in accordance with PPG and **SC199** which replaces local standards with the national standards is necessary to ensure consistency with national policy.

Conclusions

123. Subject to the inclusion of the MMs, the Plan will support and maintain a balanced supply of high quality housing.

Issue 9 – Whether the plan makes adequate provision to meet the needs of gypsies and travellers and travelling showpeople.

124. At the time the Plan was submitted for examination the most up-to-date evidence relating to gypsies and travellers and travelling showpeople was a Needs Assessment completed in 2011. On the basis of this Needs Assessment, Policy H/19 seeks to make provision for a total of 85 pitches for gypsies and travellers between 2011 and 2031. This reflects the findings of the Assessment, as modified by an internal review.
125. The government published a revised Planning Policy for Travellers in August 2015 (PPTS 2015) which amended the definition of gypsy and traveller to exclude those who have ceased travelling. A new Gypsy and Traveller Accommodation Assessment (GTAA) was commissioned by the Cambridgeshire Authorities together with Kings Lynn and West Norfolk, Peterborough and West Suffolk. This assessment (RD/Strat/221) (GTAA 2016) identified 11 gypsy and traveller households that meet the new definition, 81 households who do not meet the new definition and 194 households whose status is unknown. For households who meet the definition in South Cambridgeshire, the GTAA identifies a current need of 8 pitches and a future need of 12 pitches, taking account of concealed households and household formation. An existing

supply of 29 pitches was identified (22 vacant and 7 new pitches). The GTAA concludes that needs arising from households meeting the definition can be met through existing supply.

126. It is immediately apparent from those figures that the GTAA was unable to ascertain the status of a very high proportion of the caravan dwelling households known to be living in the District. There has been a good deal of criticism of the methodology used but efforts were made to contact and to interview all households identified, and a total of 92 interviews were completed. Some households were unavailable, others were unwilling to be interviewed. Of course, more can always be done and given the very large numbers involved in South Cambridgeshire it suggests that efforts to establish an on-going relationship with the gypsy and traveller communities and their representatives should be pursued over a longer period of time than the four months taken to complete the fieldwork for the GTAA.
127. Notwithstanding these reservations, the GTAA (2016) is the best evidence before us. **SC16, SC176, SC201 – SC205 and SC209** are necessary to reflect the new PPTS definition and the outcome of the GTAA (2016), and so ensure consistency with national policy. The Council accepts that there may be some gypsy and traveller households, who do not meet the PPTS definition, who may be able to demonstrate a need for culturally appropriate accommodation under Equalities legislation. This is a matter that can be addressed as a material planning consideration in the development management process, based on the individual circumstances of the applicant.
128. Policy H20 indicates that if a need is identified in the future, opportunities to meet that need will be sought as part of significant major development sites. As discussed above there are a number of major development sites, originally allocated in the 2006 Local Plan which are coming forward for development. We find no convincing reasons why such sites should not be considered suitable for the provision of pitches for gypsies and travellers. Consideration of the particular circumstances of individual sites can be taken into account through the masterplanning and planning application processes. **SC207 and SC208** are necessary to clarify the approach that will be taken and ensure the effectiveness of the Plan.
129. Section 124 of the Housing and Planning Act 2016 amended section 8 of the Housing Act 1985 which now requires each local housing authority in England to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed. At the time this matter was considered at the examination, the Council had not yet completed the assessment required under the Housing Act 1985 (as amended). The evidence that is available from the GTAA (2016) suggests that demand for sites on which caravans can be stationed may be considerable (up to 68 pitches to meet the needs of households whose status is unknown and 61 pitches to meet the needs of households who do not meet the definition, a total of almost 130 pitches).
130. The Council suggests that the needs of gypsies and travellers who do not meet the new definition can be met as part of the housing provision for the settled population. We agree that, in principle, that is the correct approach but the need for caravan sites has to be assessed, as required by the Housing Act.

Once that assessment has been carried out, the ways in which that need can be met must be considered in accordance with paragraph 14 of the Framework. Given the potential requirement for almost 130 pitches careful consideration will need to be given to whether this need is likely to be met through the use of a criteria based policy and the development management process, or whether site allocations will be necessary. We find, therefore, that the evidence base of the Plan is inadequate in relation to this issue and consequently the Policy response is inadequate. However, it would be disproportionate to find the entire Plan unsound, particularly as the amendment to the Housing Act was not enacted until after the Examination had started, and addressing this issue could lead to a significant delay in the adoption of the Plan. In the circumstances we consider that this is a matter that can be addressed through the planned review of the Plan. **SC206** commits the Council to considering the implications of that assessment through the early review of the Local Plan.

131. Policy H/21 is a criteria-based policy against which proposals for gypsies, travellers and travelling showpeople outside development frameworks can be considered. **SC210** and **SC213** are necessary to clarify the approach to proposals in the Green Belt, and to conform with PPTS. **SC214** reflects the wording of paragraph 25 of PPTS that local authorities should very strictly limit new traveller site development in the open countryside that is away from existing settlements, and is necessary to ensure consistency with national policy. **SC211** refers to the additional need that may arise from households who could not be assessed through the GTAA and clarifies that proposals from applicants who meet the PPTS definition will be considered against policy H/21 and is necessary to ensure the Plan is effective.
132. **SC212** explains that the revised GTAA identified a need for 9 additional plots for travelling showpeople. As this need was identified at a late stage in the examination process we agree that the most appropriate way to consider this need is through the early review of the Plan. In the interim, proposals can be considered against policy H/21.

Conclusion

133. The Plan makes adequate provision for gypsies and travellers and travelling showpeople who have been identified as meeting the current PPTS definition. However, the Council has not yet completed the review, required under the Housing Act (as amended) which is not limited to those meeting the PPTS definition. For the reasons given above, we have concluded that this matter should be addressed through the review of the Plan.

Issue 10 – Whether the employment policies in the Plan will facilitate a robust and competitive rural economy

134. The forecast employment growth within the period 2011 to 2031 is a net additional 22,000 jobs. There is a degree of consensus that this is a reasonable figure. Research and development plays an important part in the economy of the Cambridge area. The Council's Employment Land Reviews have identified a need for 50,000sqm of B1b land in South Cambridgeshire to help meet employment growth. The supply of land currently exceeds that figure. The Plan provides opportunities for new high technology and research

and development at various locations close to the boundary with Cambridge City including Cambridge Science Park through Policy E/1.

Cambridge Biomedical Campus Extension

135. The biomedical sciences are an important sector of the Cambridge economy. The Cambridge Biomedical Campus (CBC), which includes Addenbrooke's Hospital, is the largest allocated employment site in the City, and is an internationally recognised centre of excellence for biomedical research. Although the overall supply of employment land in Greater Cambridge is adequate, there are limited opportunities for further growth or expansion of the campus, which is due, in part, to its location adjoining the Green Belt.
136. The Cambridge Inner Green Belt Boundary Study (November 2015) (CIGBBS) identified a parcel of land immediately to the south of the campus development, within South Cambridgeshire, which could be the subject of limited development without significant harm to Green Belt purposes, if carefully planned and designed in accordance within the parameters set out in the document. On this basis, the Council has proposed an extension to the biomedical medical campus, as a MM to the Plan.
137. The MM will enable the further growth of biomedical and biotechnology research and development and related higher education and medical research in an appropriate location immediately adjacent to the campus. This would therefore accord with paragraph 7 of the NPPF which seeks to ensure that sufficient land of the right type is available in the right places to support growth and innovation.
138. Representors have expressed concerns that the amount of land would not be sufficient and further land should be allocated. However, the CIGBBS has indicated that the land released from the Green Belt in this location should be restricted to the relatively flat ground and should not therefore encroach on the adjacent sloping ground leading onto the Gog Magog foothills including White Hill.
139. The allocation would also be separate from the Nine Wells Local Nature Reserve (LNR) to the south. Concerns have also been expressed with regard to the effect on biodiversity as a consequence of developing this area of land. The proposed policy text however includes requirements which seek to address these concerns both in respect of the nature reserve and measures to mitigate any adverse ecological effects. The requirements also include the conservation of farmland biodiversity to deliver an overall net gain with regard to biodiversity. The policy also provides further requirements to manage and mitigate flood risks both on the site and elsewhere.
140. The policy also addresses other requirements including mitigation of surface water flood risk. We have added a minor addition to the wording of **SC216** to reflect the need, identified by Anglian Water for a Foul Drainage Strategy. A doubt has been raised regarding the grant of access rights to the site but the full details are not before us. This matter was raised at a fairly late stage in the Council's consideration of the proposed MM and we therefore consider that further investigation should be carried out as part of the Plan review.

141. We agree, for the reasons set out in the CIGBBS that the release of this site from the Green Belt would have a limited impact on the purposes of the Green Belt which are outweighed by the economic benefits that would arise from allowing the expansion of the CBC. This therefore constitutes the exceptional circumstances necessary to justify an alteration to the boundary of the Green Belt. **SC21, SC68, SC216** and **SC217**, which allocate the land as an extension to the CBC, and make consequential amendments elsewhere in the Plan are necessary to ensure the Plan makes appropriate provision for the expansion of the CBC to meet the requirements of paragraph 7 of the NPPF.

Fulbourn Road East

142. The Plan proposes the removal of a site at Fulbourn Road from the Green Belt and its allocation for employment purposes. The site is adjacent to the Peterhouse Technology Park an important employment location in the City. The Council's own review of the Green Belt found that the release of the site would have a limited impact on the Green Belt. The CIGBBS found the Yarrow Road roundabout to be the furthest extent of the urban area from the historic core and recommended that the proposed extension to the Technology Park should not extend further east. The Council sought to advance MMs to the Plan to reduce the site area of the allocation from 6.9ha to 4.3ha.

143. Our own site visit revealed that there is a reasonably recent two storey residential development known as the Alms Houses development which forms an integral part of the street scene in this location and provides a natural break to the built development of the urban area. The 6.9ha extension proposed in the submission Plan would result in a similar eastward extent to the built development to south of Fulbourn Road. Accordingly, we agree with the Council's initial consideration that the release of the 6.9ha site would have a limited impact on the Green Belt which would be outweighed by the benefits of employment development through the expansion of the Technology Park in this sustainable location, thereby constituting the exceptional circumstances necessary to justify an alteration to the boundary of the Green Belt. Accordingly, we find no compelling reason to find the submission Plan unsound and recommend any MMs to this allocation.

Employment Allocations

144. The plan makes a limited number of allocations for employment development in the villages. Most form the residue of allocations from previous plans which will provide opportunities for relatively small scale development in the villages to support the rural economy.

Papworth Hospital

145. Policy E/5 seeks to ensure that the reuse or redevelopment of the Papworth Hospital site will be achieved through a sequential approach in terms of land use beginning with healthcare. This requirement reflects the fact that the hospital relocation provides a significant threat to the future viability of the village and the maintenance of a sustainable community. This is supported by the 2011 census which indicated that the village had a workplace population of 3,227. The NHS Trust was the major employer of people living in the village. The supporting text however also recognises that a mix of uses within B1 would be the most appropriate alternative in the parkland setting.

146. Papworth Hospital is in the process of moving to the Biomedical Campus so the requirement in the policy for a two year marketing period for the site before the final closure and vacation of the hospital is no longer a realistic expectation. **SC219** is therefore necessary to ensure that the Plan is realistic and effective.
147. The site is situated within the Papworth Everard Conservation Area (CA). Accordingly, there are constraints in respect of the redevelopment of the site. The preservation of the setting of Papworth Hall and the buildings located within the CA required by the policy will maintain the setting of the village and take into account the history of the site. The Council's proposed MMs on this topic appear to go beyond the duty under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. We have amended the wording of **SC220** and **SC221** accordingly.
148. Concerns have been expressed with regard to the flexibility of the policy in terms of additional uses. The Council has confirmed however that the village has seen the development of over 500 dwellings in recent years and there is no proven need for any further residential development in the village. However, **SC222** introduces a degree of flexibility in relation to residential development on the site and is necessary to ensure the Plan is effective.

Imperial War Museum

149. The Imperial War Museum at Duxford is undoubtedly an asset of national significance. The Council's proposed MMs add descriptive text to the policy and correct a spelling error. These are not necessary for soundness.

Mixed Use Development in Histon and Impington

150. Policy E/8 aims to rejuvenate the area around the former railway station in Histon & Impington providing a range of uses including B1, A1 and A3. The Council has proposed SC226 to explain that this is a Parish Council led proposal. This is not necessary for soundness.

Promotion of Clusters

151. Policy E/9 seeks to promote employment clusters in suitable locations. The Council's proposed MMs which amend the policy wording to require consistency with other policies in the Plan and to correct a typographical error are not necessary for soundness.

Shared Social Spaces

152. Policy E/10 aims to support the development of shared social spaces in employment areas. The Cambridge Cluster at 50 report identified that some business parks were isolated and were lacking in respect of social facilities. The policy therefore supports the development of complementary facilities in this regard. **SC229** amends the wording of the policy text to ensure that the appropriate scale of facilities is provided. This is necessary to ensure the policy is effective.

Employment Land in or close to the Villages

153. Policy E/13 establishes criteria for considering proposals for new employment development adjacent or very close to the development frameworks for the villages. Policy E/14 seeks to resist the conversion, change of use or redevelopment of existing employment sites to non-employment uses within or on the edge of development frameworks. The Council has proposed a MM to make it clear that the policy does not apply where a change of use is permitted development. Self-evidently development plan policies will not be engaged where permitted development is concerned and this MM is not necessary for soundness.

154. It was questioned whether the requirement for a 12 month marketing period is consistent with paragraph 22 of the NPPF which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. However, the premature loss of employment sites in villages could lead to less sustainable commuting patterns. We therefore are of the view that the 12 month period provides an appropriate safeguard when marketing industrial sites in these locations.

Tourism

155. Policies E/19 and E/20 seek to support tourist facilities and visitor attractions. The Council has proposed a MM to policy E/19 (**SC231**) to add a requirement that a scheme should be in scale with the nature of the facility it supports. This is necessary to ensure the Plan is effective.

156. The proposed MMs to policy E/20 seek to move wording regarding the length of holiday lets from the supporting text into the policy wording. However, the principle of controlling holiday lets is embedded in the policy and we are not convinced that this MM is necessary for soundness.

Conclusions

157. The Plan is consistent with national policy and will facilitate a robust and competitive rural economy, subject to the inclusion of the main modifications.

Issue 11 – Whether the Plan will protect, preserve and enhance the built and historic environment and whether the policies are consistent with the NPPF

158. South Cambridgeshire is a primarily rural area with a variety of settlements ranging from hamlets to larger villages, new settlements and extensions to the urban area of Cambridge. Policy HQ/1 seeks to ensure that all new development is of a high quality and respects its surroundings. The policy promotes a design-led approach and includes a number of criteria against which proposals for new development will be judged. The policy broadly accords with paragraph 57 of the NPPF. However, a number of changes and additions to the text are necessary to ensure it will be effective and fully consistent with national policy. **SC143 – SC150.**

159. Policy HQ/2 aims to encourage the provision of public art in residential schemes of over 10 dwellings and schemes of over 1,000 sq. m of employment and retail development. The Council has recognised that where public art cannot be provided on site a financial contribution may be appropriate. **SC151** adds such a provision and we consider this to be necessary to ensure the policy is effective. We have added further wording to the proposed modification to restrict the pooling of contributions in accordance with national policy. We have no doubt that the involvement of Parish Councils in the provision of public art will be beneficial but we do not consider this to be a soundness issue for the Plan. **SC153** updates the supporting text to the policy with regard to the Council's current proposals for the preparation of SPD and is necessary for clarity and effectiveness.

Historic Environment

160. Policy NH/14 seeks to sustain and enhance the district's historic environment and sets out a range of criteria which have to be met in order for development relating to heritage assets to be supported. **SC169** amends Section 2 of the policy to clarify that the level of significance of a heritage asset has to be considered when assessing a development proposal which would affect it. This is necessary to ensure consistency with section 12 of the NPPF. **SC170** corrects the wording in criterion 2d so as to clarify that it refers to non-designated heritage assets, which is necessary for consistency with national policy.

161. **SC171** adds wording to paragraph 6.48 of the supporting text which refers to an understanding of traditional materials in vernacular buildings in the context of the historic environment. This is necessary to ensure consistency with paragraph 126 of the NPPF which refers to new development making a positive contribution to local character and distinctiveness.

162. **SC172** amends the wording of the second and third sentences of paragraph 6.49 of the supporting text to achieve consistency with Section 12 of the NPPF. **SC173** adds text to paragraph 6.51 to confirm that the Council is committed to ensuring the future viable uses of heritage assets. This is necessary to ensure conformity with one of the core planning principles in paragraph 17 of the NPPF with regard to conserving heritage assets for the benefit of future generations. **SC175** revises paragraph 6.57 relating to the complete loss of a heritage asset. The revised wording sets out the requirements necessary for recording and advancing the understanding of the asset to be lost and is necessary to ensure the Plan is effective in this respect. We have no doubt that the Cambridgeshire Historic Environment Record is a useful resource. However, the Council's proposed MM relating to this is largely descriptive and is not necessary for soundness.

Conclusions

163. Subject to the inclusion of the MMs identified above the Plan will protect, preserve and enhance the built and historic environment and will accord with the NPPF.

Issue 12 – Whether the Plan will protect and enhance the natural environment and whether these policies are consistent with national policy

164. Policy NH/2 seeks to protect and enhance landscape character in individual National Character Areas. The supporting text indicates the five National Character Areas identified by Natural England in respect of the South Cambridgeshire landscape. **SC154** adds additional text to paragraph 6.8 to provide further clarification on the East of England Landscape Typology which is relevant to South Cambridgeshire, and is necessary to ensure the Plan is effective.
165. Policy NH/4 aims to support biodiversity. **SC155** which clarifies the contribution that green corridors can make to wider ecological networks is necessary for clarity and effectiveness. Policy NH/5 seeks to protect Sites of Biodiversity or Geological Importance. **SC156**, **SC157** and **SC158** are necessary to ensure consistency with paragraphs 117 and 118 of the NPPF.
166. Policy NH/6 seeks to conserve and enhance green infrastructure. **SC159** adds a reference to bridleways, which are a significant element in the green infrastructure of South Cambridgeshire, and is necessary to ensure the policy is effective.
167. Policy NH/7 seeks to protect ancient woodland and veteran trees in the context of development proposals. **SC160** makes changes to paragraph 6.33 of the supporting text to remove the intention of compiling a list of veteran trees by introducing a requirement that any development proposal where the application site contains trees and/or could affect trees will need to be supported by a tree survey in accordance with BS5837: *Trees in relation to construction-recommendations to determine the significance and amenity value of trees on or near the site*. The changes will therefore make it possible to identify ancient woodland or ancient trees at the planning application stage. As the Council no longer intends to compile a list of veteran trees this MM is necessary to ensure that the Plan is effective and consistent with paragraph 118 of the NPPF.

Local Green Space

168. Policy NH/12 relates to the Local Green Space (LGS) designation in paragraphs 77 and 78 of the Framework. The policy refers to the allocations of Local Green Spaces identified in the Policies Map and the criteria for their designation. Paragraph 78 of the Framework affirms that local policy for managing development within a LGS should be consistent with policy for Green Belts. **SC168** brings the policy into line with the wording of paragraph 87 of the Framework in respect of inappropriate development in the Green Belt.
169. During the course of the examination we expressed our concerns that the Council's assessment of the proposed LGS designations had not been carried out with sufficient rigour (RD/GEN/420) and our preliminary view was that a number of the sites did not meet the requirements of the NPPF and PPG. In response, the Council undertook further work (RD/NE/370) which concluded that only 83 of the proposed areas met the requirements in paragraphs 77 and 78 of the Framework.

170. In respect of those sites which the Council considered did not meet the Framework criteria for LGS, it concluded that 25 sites should return to Protected Village Amenity Areas (PVAA), 43 sites should be designated as new PVAA sites, and 4 sites should be designated as Important Countryside Frontages.
171. We have given full consideration to the Council's findings as a consequence of the review and are satisfied that it was carried out with due rigour. We have also taken into account the representations in respect of the LGS sites. However, we find no compelling evidence which would cause us to differ from the conclusions of the Council's analysis. **SC275** sets out a new Appendix to list the LGS sites which will be shown on the policies map.

Conclusions

172. Subject to the inclusion of the MM identified above, and changes to the policies map in respect of LGS sites, we conclude that the Plan contains a comprehensive set of policies to protect and enhance the natural environment of the District, consistent with the aims of national policy.

Issue 13 – Whether the Plan will facilitate the retention and provision of local services and facilities

173. Policy SC/1 allocates sites for local open space provision. **SC235** deletes three of the sites reflecting the most up-to-date information on the deliverability of these sites. The Council has proposed SC236 to include a reference to its Recreation and Open Space Study of 2013, but this is simply a factual reference and not, in our view, necessary for soundness. **SC237** reflects the part that Neighbourhood Plans can play in addressing local needs for open space. These modifications are necessary for clarity and effectiveness.
174. Policy SC/3 lists village services which will be protected. **SC239** adds to the list 'sports venues, cultural buildings, places of worship'. We agree that these uses would generally be regarded as important local facilities and the MM is therefore necessary to ensure the Plan is effective.
175. Policy SC/4 guides the provision of new services and facilities in connection with new development. **SC242** clarifies that the Council will not seek tariff style planning obligations from small sites. **SC247** provides revised wording in relation to proposals in the Green Belt. These MMs are necessary to ensure conformity with national policy. The Council's proposed MM SC243 repeats information given elsewhere about the relationship between this Plan and the extant AAPs, and is not necessary for soundness. Proposed MM SC244 seeks to include information about working with parish councils to establish the form of governance for major new developments. We have no doubt that this is a desirable course of action but it is not necessary for soundness. **SC245** includes reference to the Playing Pitch Strategy and Indoor Sports Facility Strategy which have been completed in association with Cambridge City Council. As these reflect the latest position and are likely to provide background information to inform the consideration of planning applications this MM is necessary to ensure the policy is justified and effective. Proposed MM SC246 states that neither of the Strategies identified a need for a sub-regional sports facility or stadium. In fact, neither of the Strategies assessed

the need for such a development. This MM is therefore not justified by the evidence.

176. Policy SC/5 deals with hospice provision. **SC248 – SC250** broaden the scope of the policy to cover community healthcare facilities. This is necessary to ensure the Plan is positively prepared in relation to this important area of healthcare.
177. Policy SC/7 addresses requirements for outdoor play space and informal open space. The standards to be met are contained in policy SC/8. As currently drafted the relationship between the two policies is not entirely clear. **SC251** and **SC252** combine the two policies and are necessary for clarity and effectiveness.
178. Policy SC/9 seeks to protect existing recreation areas, allotments and community orchards. **SC253** expands the policy to include playing fields and is necessary to ensure full conformity with paragraph 74 of the NPPF.
179. Policy SC/13 addresses the air quality implications of development. **SC260** adds a reference to the requirements of paragraph 124 of the NPPF relating to Air Quality and is necessary to ensure full conformity with national policy.
180. A number of other MMs are proposed to policies in Chapter 9 which are intended, for the most part, to update the text or provide cross references to other documents, or include matters, e.g. impact on heritage assets, that are already dealt with elsewhere in the Plan. We do not consider they are necessary for soundness.

Conclusions

181. Subject to the inclusion of the MMs identified we conclude that the Plan will facilitate the retention and provision of local services and facilities.

Issue 14 – Will the Plan's policies contribute to the mitigation of and adaptation to climate change and are they consistent with national policy?

182. Chapter 4 of the plan contains a range of policies which are intended to contribute to the mitigation of, and adaptation to, climate change. **SC115** adds delivering community renewable projects to the list of measures which can contribute to reducing greenhouse emissions and is necessary for effectiveness.
183. Policy CC/1 requires applicants to submit a sustainability statement to demonstrate that climate change mitigation and adaptation principles are taken into account. **SC117 – SC120** provide additional guidance on how the policy will be implemented and are necessary for clarity and effectiveness. **SC121** is necessary to remove reference to the Government's zero carbon policy which has been withdrawn.
184. Policy CC/2 includes criteria against which proposals for renewable energy can be considered. The WMS of 18 June 2015 set out new considerations to be applied to proposals for wind energy, including a requirement that the site should have been identified as suitable for wind energy development in a Local or Neighbourhood Plan. The WMS was published after the plan had been

submitted for examination and no evidence is available regarding areas in the District which may be suitable for wind energy. Concern was expressed that communities who may wish to bring forward community led proposals, such as the successful community turbine scheme at Gamlingay, would find the process of preparing a Neighbourhood Plan too onerous. However, Neighbourhood Plans have now been adopted by a significant number of communities across the country, and in any event a different approach would not be consistent with the clear and unambiguous intention of the WMS.

SC122 and **SC125** are necessary to ensure that the requirements introduced by the WMS are included in policy CC/2. The policy also requires renewable energy developments to connect to existing national energy infrastructure.

SC124 which allows connection to an associated development or community project is necessary to ensure flexibility and effectiveness. **SC123** amends the criteria against which proposals will be considered to clarify that the impact of associated infrastructure will be taken into account and that impact on high quality agricultural land will also be a consideration. This MM is necessary for clarity and effectiveness.

185. Policy CC/3 requires new development to reduce carbon emissions by a minimum of 10% over the requirements set by Building Regulations. There is evidence that the Council has engaged with appropriate partners and has a good track record of achieving a similar requirement under an existing development plan policy. There is also evidence that this requirement will not have an unacceptable impact on viability. The requirement is therefore consistent with paragraph 174 of the NPPF and PPG. **SC126** and **SC127** which provide more detail on how the policy will be implemented are necessary for clarity and effectiveness.

186. Policy CC/4 requires new residential development to achieve the equivalent of CSH Level 4 for water efficiency. The Deregulation Act 2015 prohibits local authorities from setting any additional local technical standards relating to the construction or performance of new dwellings. However, if justified, the optional national technical standard for water efficiency can be included in local plans. South Cambridgeshire is within an area of water stress and the inclusion of the optional national standard is justified. **SC128 – SC131** achieve this and are necessary to ensure consistency with legal requirements and national policy.

187. **SC116** clarifies that South Cambridgeshire is not in an area of 'serious' water stress and this part of the MM is necessary for clarity and effectiveness. However, the elements of the MM which simply add dates for the opening of showhomes are not necessary for soundness as they are very minor additions to the text. We have therefore deleted them. The wording of policy CC/5 that 'unreasonable premiums' should not be added for environmentally friendly options is somewhat vague and therefore **SC132** is necessary to clarify the meaning of the policy and ensure effectiveness.

188. Policy CC/6 relates to construction methods. **SC133** clarifies that the level of information required will be proportionate to the scale and nature of the proposed development. This is necessary to ensure that unnecessary burdens are not placed on small scale development and to ensure the plan is effective.

189. Policy CC/8 requires the incorporation of Sustainable Drainage Systems. **SC134 – SC136** update the text to refer to the national non-statutory technical standards that have been introduced since the Plan was submitted for examination. Similarly, they also add a reference to local guidance in Cambridgeshire Flood and Water SPD. These MMs are necessary to ensure effectiveness.
190. Policy CC/9 seeks to manage flood risk. **SC137 – SC141** modify the policy so as to ensure that requirements are imposed where appropriate and practicable and to specify that an SPD will be prepared to provide further guidance on the implementation of the policy. A number of other relatively minor amendments to the text are proposed but taken together these MMs ensure that the plan will be effective in relation to managing flood risk.

Conclusions

191. Subject to the inclusion of the MMs identified, the Plan will contribute to the mitigation of and adaptation to climate change and will be consistent with national policy.

Issue 15 – Whether the Plan makes adequate provision for transport and related infrastructure.

192. The Plan proposals are broadly consistent with the Transport Strategy for Cambridge and South Cambridgeshire prepared by the County Council. There was considerable dispute during the course of the examination over the adequacy of the evidence base supporting the Plan in this regard, particularly in relation to the transport infrastructure associated with the development of the new settlements. The new settlements are not expected to deliver new development in the early years of the Plan period and for the reasons given above we have come to the view that there is a reasonable prospect that the necessary infrastructure can be delivered and that progress can be assessed through the early review of the Plan.
193. **SC265** amends Policy TI/3 to specify that the parking standards included in the Plan are intended to be indicative for car parking provision but applied as a minimum for cycle parking. This is necessary to promote the use of sustainable modes of transport. **SC266** corrects an error in the car parking standard for A2 uses to read 1 space per 25 m² (rather than 2 m²) and is necessary to ensure the Plan is effective.
194. Policy TI/5 sets criteria for assessing aviation-related proposals. The Council's proposed MM SC267 seeks to include a reference to IWM Duxford. Whilst this may improve the Plan we do not consider this factual addition to the text is necessary for soundness. Policy TI/6 establishes an air safeguarding zone in connection with Cambridge Airport. **SC268** adds greater detail regarding the implications for development within the safeguarding zone and also includes a similar air safeguarding zone in association with the Imperial War Museum in Duxford. This MM is necessary to ensure the effectiveness of the Plan.
195. Policy T1/8 deals with the infrastructure required in relation to new development. **SC270** specifies that contributions will not be sought in connection with some forms of development as set out in PPG. This is necessary to ensure consistency with national policy. Policy TI/9 relates to

education facilities. **SC272** identifies that there is a shortfall of over 1,000 secondary school places. It is expected that this need will be met by a new secondary school to serve the eastern part of Cambridge. This MM is consistent with policy SS/3, as modified, and is necessary to ensure the effectiveness of the Plan.

196. Other modifications are proposed by the Council to policies in Chapter 10 of the Plan but these are relatively minor wording changes for updating or clarification and we are not persuaded that these are necessary for soundness.

Conclusion

197. Subject to the inclusion of the MMs identified we are satisfied that the plan makes adequate provision for transport and other infrastructure requirements.

Issue 16 – Is the approach to monitoring the plan's policies effective?

198. Figure 4 of the Local Plan lists monitoring indicators such as 'total dwellings built by settlement category'. The accompanying text states: *If, as a result of monitoring and review, it appears that development is not coming forward in a sustainable or timely manner, the Council will be proactive in using its powers to respond to changing circumstances.....* However, the Plan does not include any targets or trigger points/action to be taken in the event that targets are not being met. **SC37, SC38** and **SC40** replace Figure 4 with a new Appendix E which includes targets, triggers and actions, and is necessary to ensure that Plan will be effective.

Issue 17 – Should a commitment to a review of the Plan, within an agreed period, be included in the Plan

199. There are a number of issues outlined in this report where our conclusion that the Plan can be found sound depends, to some extent, on a review of the Plan within an agreed period. The Council has indicated that the preparation of a joint plan with Cambridge City is a requirement of the Greater Cambridge City Deal. The preparation of a joint plan is an opportunity to review the Local Plans of both areas.

200. No timetable for plan preparation is set out within the City Deal. The Council's proposed MM **SC41** sets a timetable for the submission of the joint local plan for examination by the summer of 2022. This timescale has been set to allow for two stages of consultation (at Regulation 18 and 19). Bearing in mind the level of public interest in this Plan and the emerging Cambridge City Local Plan 2014, and the number of representations received at all stages, we consider that the proposed timescale is reasonable.

201. The Council does not have sole control of the adoption date because of the examination process and it would not be reasonable to specify an adoption date. Nor should the policy seek to identify every area of the Plan that will need review. That will be a matter for judgement in the light of local circumstances, including the non-statutory spatial plan that is being prepared for the Cambridgeshire and Peterborough Combined Authority, and national policy, including the revised NPPF.

202. In the event that the joint plan is not prepared within the anticipated timescale, the weight to be attached to the policies in the development management process will be a matter for the decision maker, having regard to national policy.

Conclusion

203. In the light of the concerns identified in our report, we conclude that it is necessary to include a commitment to an early review of the Plan, and that the policy included in **SC41** is an appropriate way to achieve that without prejudging what the content of the joint Local Plan or its evidence base should address.

Assessment of Legal Compliance

204. Our examination of the legal compliance of the Plan is summarised below.

205. The Local Plan has been prepared broadly in accordance with the Council's Local Development Scheme, which was updated in 2016. The adoption date for the Plan will be later than anticipated in the LDS but this is because of the time taken to complete the examination which is a factor not solely within the Council's control.

206. Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.

207. Sustainability Appraisal has been carried out and is adequate. The concerns expressed in our preliminary conclusion have been resolved through the SA Addendum 2015, which appraises sites on the edge of Cambridge. SA of the main modifications has also been carried out. Some representors have argued that not all reasonable alternatives have been subject to sustainability appraisal. However, the Council can exercise its discretion in deciding what the reasonable alternatives may be and we are satisfied that it has exercised that discretion in a reasonable way.

208. The Habitats Regulations Appropriate Assessment Screening Report (March 2014) sets out why an AA is not necessary and Natural England supports this. Following the judgement by the Court of Justice of the European Union in the case of People over Wind, Peter Sweetman v Coillte Teoranta the HRA screening process was reviewed for the Council. The review (RD/EX/160) concluded that the conclusions of the previous HRA screening reports remain valid.

209. The Local Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change, most notably those in chapter 4 of the plan which are considered under issue 14 above.

210. Subject to the inclusion of **SC1** which clarifies the relationship between the Local Plan and the adopted AAPs, and **SC2** and its accompanying Appendix (**SC284**) which define the strategic policies that a Neighbourhood Plan must be in general conformity with, the Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

211. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

212. The Council has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that with the recommended main modifications set out in the Appendix the South Cambridgeshire Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Laura Graham

Inspector

Alan Wood

Inspector

This report is accompanied by an Appendix containing the Main Modifications.