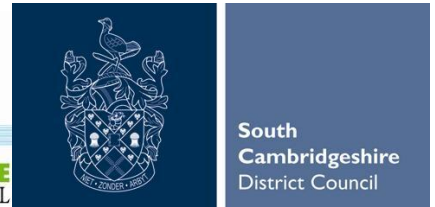


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28 September 2015

Dear Miss Graham and Mr Wood

Cambridge Local Plan and South Cambridgeshire Local Plan: Update on Progress of Further Work

In our letter dated 30 June 2015, the Councils outlined the different and inter-related workstreams necessary to address your concerns and committed to monitoring progress at key stages including providing you with updates via the Programme Officer.

The Councils are pleased to report that the various workstreams (Objectively Assessed Need for housing, Green Belt, Transport Modelling, Sustainability Appraisal, Infrastructure and Viability) are progressing well. The specifications for the work are included for information in Appendix 1, which also sets out the external consultants appointed by the Councils to undertake the further work.

Whilst the work is well advanced, it has taken slightly longer than anticipated. However, at this stage, we do not consider that this will impact on the overall timetable and our intention remains to submit the further work to you in March 2016.

Reports for councillors to consider the further work are programmed for November, with public consultation planned to take place between December 2015 and January 2016. This includes three weeks prior to Christmas and three weeks afterwards, excluding the Christmas period. The confirmed timetable is set out below:

Stage	Date
Council meetings to consider further work and any proposed modifications.	November 2015
Joint public consultation	3 weeks in December 2015 (2/12 – 23/12) 3 weeks in January 2016 (4/1 – 25/1)
Consider public consultation responses and submission of further work and associated modifications to Inspectors for consideration.	March 2016

The Councils have moved forward as swiftly as possible in order to progress matters and consider it is important to ensure that the further work currently being undertaken is robust and comprehensive.

Please do not hesitate to contact us, if you have any queries.

Yours sincerely

Sara Saunders

Caroline Hunt

Sara Saunders
Planning Policy Manager
Cambridge City Council

Caroline Hunt
Planning Policy Manager
South Cambridgeshire District Council

Enc.

Cambridge Local Plan and South Cambridgeshire Local Plan Examinations

Appendix 1: Specifications for Further Work

The following specifications for the Councils' workstreams are enclosed for information. The table below also indicates the external consultants appointed by the Councils to undertake the further work.

Project		Consultant appointed
1.	Objectively Assessed Need for Housing	Peter Brett Associates
2.	Inner Green Belt Boundary Study	LDA Design
3.	Transport	Atkins
4.	Infrastructure Delivery Study	Peter Brett Associates
5.	Viability	Dixon Searle
6.	Sustainability Appraisal	Ramboll Environ

Please note that consideration of the Written Ministerial Statements is being undertaken by the Councils.

Cambridge and South Cambridgeshire Local Plans: Objectively Assessed Needs for Housing

1. Specification

- 1.1 The Councils are seeking a contractor to carry out additional work on assessing housing need to support the Councils' Local Plans. The appointed contractor will be required to take account of the Cambridge Sub Region Strategic Housing Market Assessment (SHMA) and supporting Technical Report previously produced by the seven Councils in the Housing Market Area with the Joint Strategic Planning Unit and Cambridgeshire County Council's Research Group. The work required is focusing specifically on market signals, in particular affordability, and the likely outcomes of an upward revision in housing numbers on the provision of affordable housing.

2. Background

- 2.1 Since March 2011, Cambridge City Council and South Cambridgeshire District Council have been preparing new Local Plans for the period to 2031. The current Cambridge Local Plan was adopted in 2006 and the South Cambridgeshire Local Development Framework was adopted between 2007 – 2010.
- 2.2 The Councils have a long history of joint working, through the preparation of structure plans, regional plans, existing plans and joint Area Action Plans. In particular, there is a close functional relationship between Cambridge and South Cambridgeshire, reflecting the closely drawn city boundary and its rural surroundings. Furthermore, the interdependencies between the two administrative areas are well established through the location of key employment sites, patterns of travel to work and access to services and facilities.
- 2.3 The Cambridge Sub Region SHMA and supporting Technical Report looked at housing need across the Housing Market Area (extending beyond Cambridge and South Cambridgeshire) and identified objectively assessed need for Cambridge and South Cambridgeshire of 14,000 and 19,000 respectively. The SHMA and Technical Report were produced in-house by officers from Cambridgeshire County Council's Research Team, the constituent local authorities in the Housing Market Area, and the Joint Strategic Planning Unit for Cambridgeshire and Peterborough.
- 2.4 The Planning Practice Guidance was issued by the Government in March 2014, the same month in which the plans were submitted for independent examination.
- 2.5 The Councils submitted the new Local Plans for examination on 28 March 2014, with Laura Graham BSc MA MRTPI being appointed as the Inspector for both Plans and Alan Wood MSc FRICS appointed as the Assistant Inspector.
- 2.6 The first hearing sessions took place in November 2014. These covered various joint matters that have a bearing on both plans, including Housing Need. Examination sessions continued until April 2015. The session on housing needs took place during the week commencing 11 November 2014. The main focus of debate over the day and a half was whether the figures of 14,000 new homes in Cambridge and 19,000 new homes in South Cambridgeshire identified in the SHMA are appropriate. The Council maintained that these figures are justified, and highlighted that the SHMA has already been endorsed in respect of the Fenland and East Cambridgeshire Local

Plans, whilst other participants argued for substantially higher housing figures for both Cambridge and South Cambridgeshire and particularly focused on affordability of housing. The Councils also explained the population led methodology taking account of economic forecasts and the resulting lift against household forecasts.

- 2.7 On 20 May 2015, the Inspectors wrote to both Councils with their preliminary conclusions on some of the matters that were considered at the hearing sessions. The Inspectors' letter can be found [here](#) and the relevant comments concerning Housing Need are reproduced below.

“Objectively assessed need for new housing

The SHMA methodology for assessing the need for new housing is not entirely consistent with Planning Practice Guidance, as it does not use national household populations as the starting point for the assessment. However, the Councils have explained that the national household projections for the Cambridge area are implausibly low due to the migration methodology used. A number of representors have concurred with this view, even though they may not agree with the final figures in the SHMA assessment (14,000 new homes in Cambridge City and 19,000 in South Cambridgeshire). Alternative assessments of need, using different methodologies, have been promoted by some representors and these indicate that the level of need may be around 43,000 new homes across the two authorities. Planning Practice Guidance notes that no single approach will provide a definitive answer. In these circumstances, it may be concluded that the SHMA Assessment is at the lower end of the likely range of possible levels of need to 2031. However we are concerned, in particular, that the Councils approach to the establishment of the full objectively assessed need has not fully taken into account the advice in the Planning Practice Guidance regarding market signals, particularly in relation to affordability.

From the discussion at the hearing, it seems to be generally accepted that there is a chronic shortage of affordable housing in Cambridge, even taking into account the Councils' recent updating of the SHMA following the review of the housing registers. There is no evidence before us that the Councils have carried out the kind of assessment of market signals envisaged in the Guidance; or considered whether an upward adjustment to planned housing numbers would be appropriate. It is not, in our view, adequate simply to express doubts as to whether such an upward adjustment would achieve an increase in the provision of affordable housing (which appeared to be the approach taken by the Councils at the hearing), or to suggest, as in the Councils' Matter 3 Statement, that this could only be tackled across the HMA, rather than in individual districts. There should be clear evidence that the Councils have fully considered the implications and likely outcomes of an upward revision in housing numbers on the provision of affordable housing.

The DCLG 2012-based household projections were published in late February 2015 after the relevant hearing had taken place and notwithstanding the comments in your Matter 3 statement that these projections would not have any implications for objectively assessed housing need, we are asking you to consider whether the 2012 based household projections suggest a different level of need and if so, how big is the difference and does it indicate that further modifications should be made to the Plans. We will also be seeking the views of those who made relevant representations on this issue.”

3. Project Scope

3.1 The Councils are seeking to appoint a contractor to support them in responding to the issues concerning objectively assessed need set out in the Inspectors' letter. The required response appears to fall into three specific areas, as they relate to Cambridge and South Cambridgeshire, as follows:

- 1) To fully take into account the advice in the Planning Practice Guidance regarding market signals, particularly in relation to affordability;
- 2) To carry out an assessment of market signals envisioned in the Guidance and to apply that guidance with a view to demonstrating that the Councils have fully considered the implications and likely outcomes of an upward revision in housing numbers on the provision of affordable housing; and
- 3) To consider whether the 2012 based household projections suggest a different level of need and if so, how big is the difference and does it indicate that further modifications should be made to the Plans.

3.2 In light of the above, the appointed contractor will advise whether any adjustment in the current identified housing requirement for Cambridge and South Cambridgeshire is necessary. In responding to these issues, the appointed contractor will be required to work with the existing evidence base developed for the Local Plans. A systematic and thorough approach will be necessary which takes account of the existing work, the requirements of national guidance in the National Planning Policy Framework and the Planning Practice Guidance and an appreciation of the views of representors in relation to the issues raised by the Inspectors.

3.3 The Councils and their partners will provide necessary background material and briefing to enable this work to be undertaken in an effective and efficient manner.

3.4 The Councils are seeking to work with a contractor who can demonstrate a high level of knowledge and practical experience of undertaking objective assessments of housing need in accordance with national guidance. In particular, this must include knowledge and practical application of the Planning Practice Guidance requirements on market signals and affordable housing, including a thorough understanding of how these have been assessed by local authorities and Inspectors elsewhere in the country.

3.5 It is likely that the issues raised by the Inspectors will need to be considered at further Local Plan Examination hearing sessions. Consequently, the appointed contractor must be able to demonstrate a proven track record of effective and authoritative representation on behalf of local authorities on these issues at Local Plan examinations and agree to so represent the Councils regarding the findings of this work. The price of such representation to be included in the quote as an item.

3.6 This work forms part of the plan making process for the Councils' Local Plans. The contractor must demonstrate in writing that they have no conflicts of interest in respect of work on the effect of market signals and affordable housing delivery on the Objectively Assessed Need for Housing in the Greater Cambridge area.

4. Objectives

4.1 The objectives for this work are to:

- Address the specific issues raised in the Inspectors' letter on the objectively assessed need for new housing in each of the two Councils' Local Plans;

- Demonstrate clearly how the relevant requirements of the National Planning Policy Framework and Planning Practice Guidance have been taken into account; and
- Justify any recommended consequential changes to the established objectively assessed need figures based on evidence and a clear methodology.

5. Working Arrangements and Timescales

- 5.1 This work has dependencies with other work the authorities have been asked to undertake by the Inspectors.
- 5.2 The overall programme needs to be delivered to a timetable agreed with the Inspectors. The necessary work to address the Objectively Assessed Need for Housing issues raised by the Inspectors is a discrete, self-contained project that needs to be delivered in a relatively quick timeframe.
- 5.3 Accordingly, the Councils require a final report to be completed by September – October 2015.
- 5.4 The consultants will be expected to work closely with the Councils and to provide a single point of contact.
- 5.5 The consultant will keep the Councils informed at all stages of the work and should provide a regular flow of information on the progress of the project against the timetable, any issues or difficulties arising, and proposals for their resolution, including details of their effect on the timetable.
- 5.6 Consultants should confirm that there would be no current, potential or perceived conflict of interest in their carrying out the work. If there are any such conflicts now or any arise at a point before or during the commencement of the work, the consultants must explain what safeguards would be put in place to mitigate the risks of conflict of interest.

Cambridge and South Cambridgeshire Local Plans: Inner Green Belt Boundary Study

1. Specification

- 1.1 The Inspectors examining the Cambridge and South Cambridgeshire Local Plans have raised concerns about the methodology employed in the Green Belt Review. In order to address these concerns, Cambridge City Council and South Cambridgeshire District Council (the Councils) are seeking a contractor to carry out an independent assessment of the Inner Green Belt Boundary in relation to the purposes of the Cambridge Green Belt.
- 1.2 The objective for this work is to specifically address the concerns about the Green Belt methodology raised in the Inspectors' preliminary conclusions letter.
- 1.3 This work will form part of a wider joint strategic work programme, the purpose of which will be to address concerns raised by the Inspectors examining the Local Plans in their letter of 20 May 2015. This will inform the ongoing examination of the Cambridge and South Cambridgeshire Local Plans.
- 1.4 This brief outlines the Councils' specification for the work.

2. Background

- 2.1 Since March 2011, Cambridge City Council and South Cambridgeshire District Council have been preparing new Local Plans for the period to 2031. The current Cambridge Local Plan was adopted in 2006 and the South Cambridgeshire Local Development Framework was adopted between 2007 and 2010.
- 2.2 The Councils have a long history of joint working, through the preparation of structure plans, regional plans, existing plans and joint area action plans. In particular, there is a close functional relationship between Cambridge and South Cambridgeshire, reflecting the closely drawn city boundary and its rural surroundings. Furthermore, the interdependencies between the two administrative areas are well established through the location of key employment sites, patterns of travel to work and access to services and facilities.
- 2.3 The Councils submitted the new Local Plans for examination on 28 March 2014, with Laura Graham BSc MA MRTPI being appointed as the Inspector for both Plans and Alan Wood MSc FRICS appointed as the Assistant Inspector.
- 2.4 Joint hearing sessions took place between November 2014 and April 2015. These covered various strategic matters that have a bearing on both plans, including Green Belt. The session on Green Belt took place during the week commencing 9 February 2015 (Matter 6). During the debate:
 - Promoters of large sites on the edge of Cambridge challenged the robustness of the Councils' joint Inner Green Belt Boundary Study 2012 and the methodology used, arguing that their various preferred approaches were more appropriate and that much larger areas of land could be released from the Cambridge Green Belt and allocated for development without significant harm. They considered that the level of need for jobs and homes and the sustainability merits of land on the edge of Cambridge comprised exceptional circumstances for reviewing the Green Belt.
 - Several local environmental groups and local residents argued that there were no exceptional circumstances for releasing land from the Green Belt, questioning the

purposes of the Cambridge Green Belt included in both Councils' Local Plans. They considered that even the smaller allocations included in the Local Plans should be deleted.

- Council officers affirmed that the need for jobs and homes do comprise exceptional circumstances to review the Green Belt but only so far as this would not cause significant harm to the purposes of the Cambridge Green Belt. They maintained that the Green Belt purposes included in the Plans are appropriate in the context of its role in protecting the setting and character of Cambridge as an historic town, carrying these purposes forward from earlier plans where they were supported by independent Inspectors.

- 2.5 On 20 May 2015, the Inspectors wrote to both Councils with their preliminary conclusions on some of the matters that were considered at the hearing sessions. The Inspectors' letter can be found [here](#) and the relevant paragraphs concerning the Green Belt in relation to this specification are reproduced below:

The National Planning Policy Framework affords a high degree of protection to the Green Belt. The letter from Nick Boles MP to Sir Michael Pitt dated 3 March 2014 notes that it has always been the case that a local authority could adjust a Green Belt boundary through a review of the Local Plan. The letter goes on to state that it must always be transparently clear that it is the local authority itself which has chosen this path. In the case of Cambridge City and South Cambridgeshire District the two authorities have individually and jointly undertaken a review of the inner Green Belt boundary during the course of plan preparation and concluded that a very small number of sites should be released to meet housing and employment needs.

A number of respondents have questioned the methodology employed in the Green Belt Review and we have found it difficult, in some cases, to understand how the assessment of 'importance to Green Belt' has been derived from the underlying assessments of importance to setting, character and separation. For example, sector 8.1 is given a score of 'high' with regard to importance to setting, and 'medium' with regard to importance to both character and separation, but the importance to Green Belt is then scored as 'very high'. Sector 8.2 is given a score of 'low' for importance to both setting and character, and 'negligible' in relation to separation but yet is given an overall score of 'medium'. These areas are referenced only as examples of the methodology, not as any indication that we consider that they are suitable for development.

- 2.6 The Inspectors' letter raises other issues in relation to the Green Belt, the weight attributed to it and how it is addressed in the SA/SEA process. The assessment of Green Belt in the context of paragraphs 84 and 85 of the National Planning Policy Framework is a matter outwith the scope of this specification.

3. The Cambridge Green Belt

- 3.1 The Green Belt surrounding Cambridge has been in place since the 1950s. The current development strategy for the Cambridge area stems as far back as 1999, with the work undertaken by Cambridge Futures and the recognition that a change in approach was required in order to redress the imbalance between homes and jobs in and close to Cambridge, and provide for the long term growth of Cambridge University and Addenbrooke's Hospital whilst minimising increases in congestion on radial routes into the city. The strategy makes provision for development within Cambridge or as sustainable extensions to the urban area, at the new town of Northstowe (linked to the Cambridgeshire guided busway), and at the most sustainable rural settlements. The Cambridgeshire and Peterborough Structure Plan 2003 also identified the ring of

market towns around Cambridge that lie beyond South Cambridgeshire as having a role in the sequence.

- 3.2 The Cambridgeshire and Peterborough Structure Plan 2003 identified broad locations to be released from the Green Belt and detailed site boundaries for Green Belt releases were established through the Cambridge Local Plan 2006, the South Cambridgeshire Local Development Framework, and the joint Area Action Plans for North West Cambridge and Cambridge East. All of these plans were subject to extensive periods of public consultation and examination by a Planning Inspector.
- 3.3 In order to feed into this process, three studies were undertaken of the Green Belt surrounding Cambridge to enable land to be assessed and then as appropriate released for development. The first was the Cambridge Sub Region Study 2001 prepared by Colin Buchanan and Partners as lead consultants for the Regional Planning Conference which informed the Structure Plan. This was followed by Cambridge City Council's Inner Green Belt Boundary Study (2002) and South Cambridgeshire District Council's Cambridge Green Belt Study prepared by LDA (September 2002).
- 3.4 As part of preparing the new Local Plans, the Councils considered that, despite the relatively recent comprehensive review of the Green Belt in 2001/2002 that informed the last round of plan making, it was appropriate to test whether there were any further areas of land that could be considered for removal from the Green Belt. The 2012 Inner Green Belt Boundary Study prepared jointly by both Councils specifically considered zones of land immediately adjacent to Cambridge in terms of the purposes of the Green Belt. The methodology used in the Study generally followed that used in the earlier 2002 Inner Green Boundary Study. The approach taken in both the 2002 and 2012 Inner Green Belt Boundary studies was to gather and assess the base data related to the land, i.e. the topography, location in relation to existing development and urban edge, distance and relation with the historic core, etc. and then to assess the land against the purposes of the Cambridge Green Belt.
- 3.5 Following criticism during the hearing sessions and having regard to the Inspectors' letter, the Councils are taking this opportunity to commission an independent assessment of the Inner Green Belt Boundary in relation to the purposes of the Cambridge Green Belt.

4. Project Scope

- 4.1 The Councils are seeking support in responding to the issues concerning the Cambridge Green Belt as set out in the Inspectors' letter and in representations. The required work falls into the following areas:
 1. To undertake assessment of the Inner Green Belt Boundary and set out the methodology used;
 2. To review the methodologies put forward by objectors in relation to the inner Green Belt boundary;
- 4.2 The work should provide a robust, transparent and clear understanding of how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt. It is considered that assessment will involve both desk-based analysis and site visits.
- 4.3 A systematic and thorough approach will be necessary which takes account of the requirements of national guidance in the National Planning Policy Framework and has

an understanding of the views of representors in relation to the issues raised by the Inspectors.

- 4.4 The Councils will provide necessary background material and briefing to enable this work to be undertaken in an effective and efficient manner.
- 4.5 The Councils are seeking to work with a contractor who can demonstrate a high level of knowledge and practical experience of undertaking Green Belt assessment.
- 4.6 It is possible that the issues raised by the Inspectors will need to be considered at further hearing sessions. Consequently, the appointed contractor must be able to demonstrate a proven track record of effective and authoritative representation on behalf of local authorities on these issues at Local Plan examination and agree to so represent the Councils regarding the findings of this work. The price of such representation will be included in the quote as an item.

5. Requirements

- 5.1 The Councils require the findings of the work to be included in a concise, clearly written report. This will include necessary illustrative material.

6. Working Arrangements and Timescales

- 6.1 This work has dependencies with other work the authorities have been asked to undertake by the Inspectors.
- 6.2 The overall programme needs to be delivered to a timetable agreed with the Inspectors. The necessary work to address the Green Belt issues raised by the Inspectors is a discrete, self-contained project that needs to be delivered in a relatively quick timeframe. The work is to be largely completed between July – September 2015.
- 6.3 Accordingly, the Councils require a final report to be completed by September – October 2015.
- 6.4 The consultants will be expected to work closely with the Councils and to provide a single point of contact.
- 6.5 The consultant will keep the Councils informed at all stages of the work and should provide a regular flow of information on the progress of the project against the timetable, any issues or difficulties arising, and proposals for their resolution, including details of their effect on the timetable.
- 6.6 Consultants should confirm that there would be no current, potential or perceived conflict of interest in their carrying out the work. If there are any such conflicts now or any arise at a point before or during the commencement of the work, the consultants must explain what safeguards would be put in place to mitigate the risks of conflict of interest.

Cambridge and South Cambridgeshire Local Plans: Transport

1. Specification

- 1.1 To consolidate existing and prepare additional Transport Evidence for the Cambridge and South Cambridgeshire Local Plans, and address the requirements of the National Planning Practice Guidance. This brief focuses on transport modelling work, and infrastructure delivery is addressed separately.

2. Background

- 2.1 Since March 2011, Cambridge City Council and South Cambridgeshire District Council have been preparing new Local Plans for the period to 2031. The current Cambridge Local Plan was adopted in 2006 and the South Cambridgeshire Local Development Framework was adopted between 2007 – 2010.

- 2.2 The submission Cambridge and South Cambridgeshire Local Plans were accompanied by the CSR Modelling Summary Report July 2013 (RD/Strat/160). Subsequently, additional evidence was prepared during the Examination process:

- Technical Note which accompanied M7/CCC & SCDC – SUPPLEMENT 2 (assumptions in model runs) (March 2015);
- Technical Note which accompanied M7/CCC & SCDC – SUPPLEMENT 3 (revised phase 3 model run), and track changes to CSR Modelling Summary Report (April 2015).

- 2.3 The Inspectors asked for the parties to address questions around modelling assumptions and outputs outside the hearing process with a view to preparing a Statement of Common Ground. Following a meeting in April with all participants from the Matter 7 Transport hearing, a further document was prepared. The discussions relating to a Statement of Common Ground have been paused while the work to respond to the Inspectors' letter is carried out:

- CSR Modelling Summary Report for Cambridge and South Cambridgeshire Local Plans Supplementary Technical Note (May 2015).

- 2.4 As part of the examination process, the Inspectors had previously indicated that they would write to the Councils if they had concerns about the submitted Local Plans. They have now written to advise the Councils that having held hearing sessions on issues relating to overall housing need, the development strategy, Green Belt, transport and housing delivery, they have identified some issues they consider need to be addressed at an early stage.

- 2.5 The Inspectors' Letter (dated 20 May 2015) raises issues regarding infrastructure requirements and sustainable transport options, and the consideration of Green Belt sites as reasonable alternatives.

3. Objectives

- To complete additional testing of options to address the Inspectors' concerns;
- To provide up to date transport evidence to reflect changes in circumstance, and any emerging proposed modifications to the Local Plans;

- Consider and address issues emerging from the Local Plan Transport Assessment section of the National Planning Practice Guidance;
- To present a comprehensive and accessible Transport Evidence document which draws together the evidence up to this point, and additional evidence arising from this work.

4. Project Scope

4.1 The further work required is to:

- Review the Phase 2 model runs, which compared strategy options, to include options which incorporate major development options on the edge of Cambridge in the Green Belt to provide a further comparison. Opportunity should also be taken to revise existing Phase 2 model runs to reflect the updated Cambridge jobs target that was included in the Submitted Plan (and was reflected at model run Phase 3).
- Review the transport implications of any proposed modifications to the preferred strategy, including an additional model run (an update to Phase 3) if required.
- Consolidate evidence prepared previously, along with new evidence as a result of the additional work, into a single consolidated and enhanced Modelling Report / Local Plan Transport Assessment'. Include signposting to demonstrate how the National Planning Practice Guidance requirements, published after the Local Plans were prepared, have been addressed. The Report should also include a non-technical summary.

5. Working Arrangements and Timescales

- 5.1 This work has dependencies with other work the authorities have been asked to undertake by the Inspectors.
- 5.2 The overall programme needs to be delivered to a timetable agreed with the Inspectors. The work is to be largely completed between July – September 2015.
- 5.3 Accordingly, the Councils require a final report to be completed by September – October 2015.
- 5.4 The consultants will be expected to work closely with the Councils and to provide a single point of contact.
- 5.5 The consultant will keep the Councils informed at all stages of the work and should provide a regular flow of information on the progress of the project against the timetable, any issues or difficulties arising, and proposals for their resolution, including details of their effect on the timetable.
- 5.6 Consultants should confirm that there would be no current, potential or perceived conflict of interest in their carrying out the work. If there are any such conflicts now or any arise at a point before or during the commencement of the work, the consultants must explain what safeguards would be put in place to mitigate the risks of conflict of interest.

Cambridge and South Cambridgeshire Local Plans: Update of Infrastructure Delivery Study

1. Specification

- 1.1 Provide an update to the Cambridge and South Cambridgeshire Infrastructure Delivery Study, using up to date information on infrastructure delivery, costs, and sources of funding, to provide additional information to assist the Examination of the Councils' Local Plans, and the continued development of the Councils' Community Infrastructure Levies.

2. Background

- 2.1 Cambridge City Council and South Cambridgeshire District Council submitted their Local Plans for Examination in March 2014. The Local Plans were accompanied by:
 - Cambridge City and South Cambridgeshire Infrastructure Delivery Study (Peter Brett Associates 2012) (RD/T/010) [Chapters 1-9, Appendices](#);
 - [Cambridge City and South Cambridgeshire Infrastructure Delivery Study Update](#) (Peter Brett Associates 2013) (RD/T/020).
- 2.2 As part of the Examination process, the Inspectors had previously indicated that they would write to the Councils if they had concerns about the submitted Local Plans. They have now written to advise the Councils that having held hearing sessions on issues relating to overall housing need, the development strategy, Green Belt, transport and housing delivery, they have identified some issues they consider need to be addressed at an early stage. The [Inspectors Letter](#) (dated 20 May 2015) raises issues to be addressed in respect of infrastructure funding and delivery.
- 2.3 Significant changes have taken place since the Infrastructure Delivery Study 2013 update was completed. In particular, the Cambridge Authorities have secured funding through the Greater Cambridge City Deal, with the potential for £500m over a 15 year period.
- 2.4 Both Councils have submitted CIL charging schedules for Examination, which are currently anticipated to take place after the completion of the Local Plan Examinations, although this is being reviewed.
- 2.5 Both Councils have viability evidence, prepared to support the Local Plans and Community Infrastructure Levy, produced by Dixon Searle. Under a separate commission being undertaken in parallel, the viability evidence is currently being updated, including taking account of changes resulting from recent Written Ministerial Statements.

3. Project Scope

- 3.1 The consultants will be required to build on work previously produced for the two Local Plans, and create an 'Infrastructure Delivery Study Update 2015' Document.

4. Requirements

4.1 STAGE 1: Produce an Infrastructure Delivery Study 2015 Update, to:

- Review and address guidance contained in the National Planning Practice Guidance, which was published after the Local Plans were prepared and subsequent to the previous studies.
- Update known infrastructure requirements and costs where more up to date information is available, including as a result of further development of transport schemes as part of the City Deal.
- Review and update all funding sources available. Liaise with Dixon Searle, who are carrying out additional work on Viability for the Councils on a similar timeframe to this work.

4.2 STAGE 2: Update the Infrastructure Delivery Study to consider any relevant infrastructure implications.

4.3 STAGE 3: If requested, assist the Councils with the preparation of written evidence, and attend a future hearing(s) of the Local Plan examination, to respond to any technical questions regarding the study.

5. Working Arrangements and Timescales

5.1 This work has dependencies with other work the authorities have been asked to undertake by the Inspectors.

5.2 The overall programme needs to be delivered to a timetable agreed with the Inspectors. The work is to be largely completed between July – September 2015.

5.3 Accordingly, the Councils require a final report to be completed by September – October 2015.

5.4 The consultants will be expected to work closely with the Councils and to provide a single point of contact.

5.5 The consultant will keep the Councils informed at all stages of the work and should provide a regular flow of information on the progress of the project against the timetable, any issues or difficulties arising, and proposals for their resolution, including details of their effect on the timetable.

5.6 Consultants should confirm that there would be no current, potential or perceived conflict of interest in their carrying out the work. If there are any such conflicts now or any arise at a point before or during the commencement of the work, the consultants must explain what safeguards would be put in place to mitigate the risks of conflict of interest.

Cambridge and South Cambridgeshire Local Plans: Updated Viability Assessments

1. Specification

- 1.1 Undertake a review of national policy changes and market conditions with a view to provide an addendum report to the Cambridge City Council and South Cambridgeshire viability studies to assist the Examination of the Councils' Local Plans and the Community Infrastructure Levy Charging Schedules.

2. Background

- 2.1 Cambridge City Council and South Cambridgeshire District Council submitted their Local Plans for Examination on 28 March 2014. The supporting evidence base for the Cambridge Local Plan includes:

- [Strategic Housing Land Availability Assessment \(SHLAA\) and Potential Site Allocations High Level Viability Assessment](#) (RD/Strat/150);
- [Supplementary Report Small Sites – Affordable Housing Viability](#) (RD/H/320);
- [Student Accommodation – Affordable Housing Financial Contributions Viability](#) (RD/H/340);
- [Community Infrastructure Levy Viability Assessment](#) (RD/T/200).

- 2.2 The South Cambridgeshire Local Plan was accompanied by:

- [Local Plan Submission & Community Infrastructure Levy Preliminary Draft Charging Schedule Consultation Viability Study](#) (RD/T/220)

- 2.3 As part of the Examination process, the Inspectors had previously indicated that they would write to the Councils if they had concerns about the submitted Local Plans. They have written to advise the Councils that having now held hearing sessions on issues relating to overall housing need, the development strategy, Green Belt, transport and housing delivery, they have identified some issues they consider need to be addressed at an early stage. The [Inspectors' letter](#) (dated 20 May 2015) raises some concerns about infrastructure funding and delivery.

- 2.4 In response to the Inspectors' concerns, the Councils have responded (see [letter](#) of 30 June 2015), setting out a timetable for a number of workstreams. This timetable includes public consultation during November and December, with the submission of main modifications and supporting documents in February 2016.

- 2.5 The Councils have an Infrastructure Delivery Study (2012 and 2013 update) prepared to support the Local Plans and Community Infrastructure Levy, produced by Peter Brett Associates (PBA). Under a separate commission being undertaken in parallel, an update to the Infrastructure Delivery Study is being produced.

3. Project Scope

- 3.1 In light of the above, the Councils are seeking to revisit the viability assessments to ensure that the inputs and findings are consistent with other Local Plan evidence and studies.

- 3.2 Further, the Councils are conscious that, since the publication of the studies, there have been considerable changes to key inputs; including market conditions and the introduction of new national policy changes that warrant revisiting the findings in any

event. In addition, the Councils have also signed the Greater Cambridge City Deal that will unlock up to £500 million of Government funding, helping the delivery of proposed strategic developments.

3.3 Consultants should liaise with the consultants appointed to undertake the Councils' Infrastructure Delivery Study as appropriate with regard to parallel work on the Infrastructure Delivery Study.

4. Requirements

4.1 Provide an addendum report to the viability studies which will include the following:

- A) Identify key national policy changes introduced since the previous viability assessment and identify to what extent those changes would have either a negative or positive effect on viability, including the assessment of different scales of development sites and locations;
- B) Review and update the technical information in the viability studies, including values, development and build costs and run appropriate sensitivity testing based on updated inputs;
- C) Review and update inputs relating to the operation of "optional nationally described space standards" to demonstrate their effect on viability across the Councils' areas, and in relation to a representative sample of developments ranging from city, edge of city, village development and new settlements;
- D) Review recommendations regarding CIL rates, thresholds and zones.

5. Working Arrangements and Timescales

5.1 This work has dependencies with other work the authorities have been asked to undertake by the Inspectors.

5.2 The overall programme needs to be delivered to a timetable agreed with the Inspectors. The work is to be largely completed between September and October 2015.

5.3 Accordingly, the Councils require a final report to be completed by October 2015.

5.4 The consultants will be expected to work closely with the Councils and to provide a single point of contact.

5.5 The consultant will keep the Councils informed at all stages of the work and should provide a regular flow of information on the progress of the project against the timetable, any issues or difficulties arising, and proposals for their resolution, including details of their effect on the timetable.

5.6 Consultants should confirm that there would be no current, potential or perceived conflict of interest in their carrying out the work. If there are any such conflicts now or any arise at a point before or during the commencement of the work, the consultants must explain what safeguards would be put in place to mitigate the risks of conflict of interest.

Cambridge and South Cambridgeshire Local Plans: Sustainability Appraisal

1. Specification

- 1.1 Carry out a review of the Sustainability Appraisals submitted by Cambridge City Council and South Cambridgeshire District Council alongside their Submission Local Plans, and produce a joint Sustainability Appraisal Addendum to address the Inspectors' concerns regarding soundness of both Local Plans.

2. Background

- 2.1 The Councils submitted their Local Plans for Examination in March 2014, along with accompanying Draft Final Sustainability Appraisal Reports.

- 2.2 As part of the examination process, the Inspectors had previously indicated that they would write to the Councils if they had concerns about the submitted Local Plans. They have now written to advise the Councils that having held hearing sessions on issues relating to overall housing need, the development strategy, Green Belt, transport and housing delivery, they have identified some issues they consider need to be addressed at an early stage.

- 2.3 The Inspectors' Letter (dated 20 May 2015) raises concerns regarding the SA/SEAs submitted alongside the Local Plans, and in particular:

- Consistency with the Review of the Sustainable Development Strategy (2012);
- Whether they fully address the challenges in relation to delivery of sustainable new settlements;
- The weight given to Green Belt relative to other considerations;
- Comparison of reasonable alternatives at the same level as the preferred option;
- Avoiding the need to trawl through a range of documents to find the information.

- 2.4 The NPPF sets specific requirements when undertaking a Green Belt Review. Paragraph 84 requires councils to take account of the need to promote sustainable patterns of development. Paragraph 85 requires Councils to ensure consistency of Green Belt boundaries with the Local Plans' strategy for meeting identified requirements for sustainable development. The Inspectors indicated that they would expect to see this addressed in the Councils' Sustainability Appraisals. The Councils considered the sustainability of development in a number of evidence base documents (See Councils' Examination Statement to Matter 6).

- 2.5 The Main Sustainability Appraisal Documents are as follows:

- South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/60);
<https://www.scambs.gov.uk/content/draft-final-sustainability-appraisal-report-and-habitat-regulations-assessment-screening>
- Sustainability Appraisal of the Cambridge Local Plan 2014: Volume 1: Final Appraisal for Submission to the Secretary of State: March 2014 (RD/Sub/C/030);
<https://www.cambridge.gov.uk/public/ldf/coredocs/RD-SUB-C-030.pdf>
- Cambridge Local Plan 2014: Reviewing the Sustainable Development Strategy for the Cambridge Area: Joint Sustainability Appraisal (RD/LP/180).
<https://www.cambridge.gov.uk/public/ldf/coredocs/Joint%20SA%20of%20the%20Development%20Strategy.pdf>

3. Objectives

- To address the Inspectors' concerns regarding the soundness of the Local Plans;
- To meet the statutory obligations related to the Sustainability Appraisal and Strategic Environmental Assessment (notably the requirements set out in Annex 1 of the SEA Directive), and reflect guidance set out in the National Planning Practice Guidance;
- Address the requirements of the Habitats Directive.

4. Project Scope

- 4.1 The consultants will be required to undertake further Sustainability Appraisal (SA/SEA) and Habitats Regulations Assessment work, having regard to additional evidence being prepared in light of the Inspectors' Letter.

5. Requirements

5.1 Stage 1

Review the Sustainability Appraisal process of the two Councils up to this point in the plan making process, and develop a Sustainability Appraisal Addendum Report, to form part of both Councils' Sustainability Appraisals.

- Where appropriate, document new plans, strategies and evidence base documents that have become available subsequent to the existing Sustainability Appraisals, and additional evidence prepared or commissioned by the Councils in response to the Inspectors' Letter.
- Review the approach to Green Belt in the Sustainability Appraisals, and how the issue is addressed in the Scoping of the Councils' Appraisals.
- Consider how the Sustainability Appraisal can address the National Planning Policy Framework's paragraphs 84 and 85 and the issues raised by the Inspectors, and drawing on evidence being prepared in light of the Inspectors' Letter.
- Review the 'Joint Sustainability Appraisal of Development Strategy Options' and the findings of the Councils' respective Sustainability Appraisals in light of additional evidence being commissioned by the Councils in response to the Inspectors' Letter (including Transport, Infrastructure, and Green Belt), and issues raised in the 'Review of the Sustainable Development Strategy' document.
- Review and document how the Sustainability Appraisals address all reasonable alternatives to the same level as the preferred option.
- Document how the updated joint Sustainability Appraisal, (in combination with the submitted Sustainability Appraisals) meets the requirements of Government Guidance on Sustainability Appraisal, the Planning Practice Guidance, and the SEA regulations (signpost to where individual requirements are met). Reports should also include a non-technical summary.

5.2 Stage 2

- If required, carry out Sustainability Appraisal of any emerging proposed Major Modifications or alternatives identified by the Councils (for sites or policies) in light of new evidence. This will need to reflect the approaches and scoping of the individual Councils' existing appraisals. Consider any wider implications for other parts of the Sustainability Appraisals.
- If any major modifications are proposed, review findings of the Habitats Regulations Assessments of both Councils. This would initially take the form of a Habitats

Regulations Assessment Screening Report, unless issues requiring more detailed Appropriate Assessment are identified. This work should build upon information already contained within the Screening Reports produced for the authorities' Local Plans.

5.3 Stage 3

- Following public consultation, review representations received on revised Sustainability Appraisal, provide a response to issues raised and any recommended actions. Consider any further modifications proposed by the Councils.
- Assist with the preparation and review of evidence for the Local Plans Examinations, including potential appearance at future Examination Hearings.

6. Working Arrangements and Timescales

- 6.1 This work has dependencies with other work the authorities have been asked to undertake by the Inspectors.
- 6.2 The overall programme needs to be delivered to a timetable agreed with the Inspectors. The work is to be largely completed between July – October 2015.
- 6.3 Accordingly, the Councils require a final report to be completed by October 2015.
- 6.4 The consultants will be expected to work closely with the Councils and to provide a single point of contact.
- 6.5 The consultant will keep the Councils informed at all stages of the work and should provide a regular flow of information on the progress of the project against the timetable, any issues or difficulties arising, and proposals for their resolution, including details of their effect on the timetable.
- 6.6 Consultants should confirm that there would be no current, potential or perceived conflict of interest in their carrying out the work. If there are any such conflicts now or any arise at a point before or during the commencement of the work, the consultants must explain what safeguards would be put in place to mitigate the risks of conflict of interest.