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30 June 2015

Dear Miss Graham and Mr Wood

Cambridge Local Plan and South Cambridgeshire Local Plan: Inspectors' Preliminary Conclusions

Thank you for your letter dated 20 May 2015 (RD/GEN/170) setting out your preliminary conclusions in relation to the Cambridge Local Plan and South Cambridgeshire Local Plan.

The Councils have carefully considered your preliminary conclusions and the clear steer provided in order to continue to progress the Plans to adoption as soon as possible. As you know, the Greater Cambridge area continues to be a national focus for growth, and the Councils are committed to delivering the jobs, homes and infrastructure necessary to support growth as demonstrated by the signing of a City Deal with Government. To this end, the Councils agree that the most appropriate course of action would be for the examinations to be suspended while the work identified is carried out, unless you consider that there are any specific matters that could helpfully be heard alongside the further work.

The issues raised in your letter are set out below along with an outline of the work the Councils propose to undertake in order to address them.

Overall Development Strategy

The Councils note your comments in relation to the overall development strategy including the Sustainable Strategy Development Review and consider that the main issues relate to the following areas.

Your letter notes the high degree of protection afforded in national policy to Green Belt. However, you comment on the clarity of the Inner Green Belt Boundary Review methodology. The Councils would like to take this opportunity to review, to clarify and, as appropriate, to update the approach undertaken within the Inner Green Belt Boundary Review. We intend to seek independent input as part of this overall process.

In response to your letter, the Councils accept that it would have been helpful to set out more comprehensively how the range of relevant considerations, including the need to promote sustainable patterns of development, were assessed and balanced so as to inform and arrive at the development strategy. As such, the Councils propose that an addendum to the Sustainability Appraisal will be produced which addresses these matters, including an appraisal of all reasonable alternatives, including sites on the urban edge, on a comparable basis. As part of this, the Councils intend to undertake additional transport modelling of the edge of Cambridge sites to provide an appropriate further level of information so as to facilitate comparative assessment with the proposed new settlements.

The Councils note the concerns raised about the infrastructure requirements and sustainable transport options needed to deliver sustainable new settlements. The Councils intend to review the existing evidence base, particularly in relation to the funding and feasibility of new settlements. Following that review, we intend to prepare, as necessary, an addendum to the Infrastructure Delivery Study which will set out further relevant information, including in respect of funding and feasibility of identified necessary infrastructure. In the case of the A428 segregated bus link identified as an example in your letter, the City Deal Executive Board recently agreed options for consultation to be undertaken in September 2015¹ which is supported by a technical document². We provide these documents as enclosures to this letter. We would welcome your advice on whether the level of detail contained in those documents is sufficient to address the identified shortcomings in the evidence base. We do not expect you to express any conclusive view on the substance of that information at this stage but rather, if possible, to provide an indication as to whether the level of detail contained within those documents is reasonable and sufficient, or whether a greater or lesser level of detail is required.

Objectively Assessed Need for new Housing

The Councils note your comments in relation to objectively assessed need for new housing and the requirement in the National Planning Practice Guidance (PPG) regarding market signals. We propose

¹ <http://scamb.moderngov.co.uk/ieListDocuments.aspx?CId=1074&MId=6533&Ver=4>

² <http://www.gccitydeal.co.uk/citydeal/info/2/transport/1/transport/5>

to commission specialist consultants to undertake further work relating to market signals and in particular to address your comments in relation to affordability of market housing and the advice in the PPG, as well as the implications and likely outcomes of an upward revision in housing numbers on the provision of affordable housing. We will also, as part of the same process, consider whether the 2012-based household projections suggest a different level of need.

Conformity with Revisions to National Planning Policy

The Councils note your comments in relation to the recent Written Ministerial Statements dated 28 November 2014 and 25 March 2015 and had expected to address these matters through the examination process. As you suggest, the Councils will undertake a thorough audit of the policies in both plans and will propose appropriate modifications in order to ensure compliance with both Written Ministerial Statements.

Other

It is possible that wider modifications could flow from the work to be undertaken. We are keen to proceed as quickly as possible and intend to do any consequential work as part of this process unless you have any concerns to the Councils so doing.

Next Steps

In terms of next steps and moving forward, the Councils proposed the following broad timetable for your consideration. The Councils recognise the importance in striking a balance between moving forward efficiently and ensuring that the work is robust and fit for purpose. Our aim is to assist the moving forward of the overall examination programme forward towards adoption of the Local Plans. We would also welcome an indication of your current views as to how the examination process will progress, including in particular a general timetable, once the process set out in this letter has been completed and the Councils' full response to the letter of 20 May 2015 has been submitted.

There are a number of different and inter-related workstreams necessary to address your concerns. Given the nature of the work to be undertaken, it is considered prudent to monitor progress at key stages. The Councils will provide regular updates on progress via the Programme Officer, which will also be published on the Councils' websites. Any response to these updates from you would be of assistance.

Stage	Date
Scope and undertake further work, identify proposed modifications and democratic process to agree public consultation	June – October 2015
Public consultation	November – December 2015
Consider results of public consultation and democratic process to agree response to Inspectors	January – February 2016
Submission of main modifications and supporting documents	February 2016

We look forward to hearing whether you consider that the further work outlined above will address in principle the concerns raised or whether there is anything else that is required. Given the importance of putting plans in place to deliver growth in the Greater Cambridge area as soon as possible, the Councils hope that the suspension of the examinations, if confirmed, can be completed as soon as possible and the remainder of the Local Plan and CIL examinations move forward as quickly as possible.

We look forward to hearing from you in due course.

Yours sincerely,



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