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10 April 2017

To: The Leader – Councillor Peter Topping

Members of the Cabinet – Councillors Francis Burkitt, Simon Edwards,
Lynda Harford, Mark Howell, Robert Turner, Tim Wotherspoon and Nick Wright
(Deputy Leader)

Quorum: Majority of the Cabinet including the Leader or Deputy Leader

Dear Councillor

You are invited to attend the next meeting of **CABINET**, which will be held in the
SWANSLEY ROOM A AND B - GROUND FLOOR at South Cambridgeshire Hall on
THURSDAY, 20 APRIL 2017 at 2.00 p.m.

Yours faithfully
Alex Colyer
Interim Chief Executive

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AGENDA		PAGES
1.	Apologies for Absence To receive Apologies for Absence from Cabinet members.	
2.	Minutes of Previous Meeting To authorise the Leader to sign the Minutes of the meeting held on 9 February 2017 as a correct record.	1 - 8
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| 8. | A428 Black Cat to Caxton Gibbet Route Options Consultation | 47 - 56 |
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| 11. | Date of next meeting
Thursday 13 July 2017 at 6.00pm | |

OUR LONG-TERM VISION

South Cambridgeshire will continue to be the best place to live, work and study in the country. Our district will demonstrate impressive and sustainable economic growth. Our residents will have a superb quality of life in an exceptionally beautiful, rural and green environment.

OUR VALUES

We will demonstrate our corporate values in all our actions. These are:

- Working Together
- Integrity
- Dynamism
- Innovation

GUIDANCE NOTES FOR VISITORS TO SOUTH CAMBRIDGESHIRE HALL

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Agenda Item 2

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Minutes of a meeting of the Cabinet held on
Thursday, 9 February 2017 at 2.00 p.m.

PRESENT: Councillor Peter Topping (Leader of the Council)
Councillor Nick Wright (Corporate & Customer Services Portfolio Holder and Deputy Leader)

Councillors:	Simon Edwards	Finance and Staffing Portfolio Holder
	Lynda Harford	Housing Portfolio Holder
	Mark Howell	Environmental Services Portfolio Holder
	Robert Turner	Planning Portfolio Holder
	Tim Wotherspoon	Strategic Planning Portfolio Holder

Officers in attendance for all or part of the meeting:

Alex Colyer	Interim Chief Executive
Rory McKenna	Deputy Monitoring Officer
Caroline Ryba	Head of Finance
Ian Senior	Democratic Services Officer

Councillors John Batchelor, Anna Bradnam, Cicely Murfitt and Bridget Smith (Leader of the Opposition) were in attendance, by invitation.

1. APOLOGIES FOR ABSENCE

Councillor Francis Burkitt (Greater Cambridge City Deal Portfolio Holder) sent Apologies for Absence.

2. MINUTES OF PREVIOUS MEETING

Cabinet authorised the Leader to sign, as a correct record, the minutes of the meeting held on 17 November 2016.

Cabinet authorised the Leader to sign, as a correct record, the minutes of the meeting held on 19 January 2017, subject as follows:

Minute 9 – Medium Term Financial Strategy

Delete the penultimate paragraph (“The Interim Chief Executive explained that the Council had taken advice from Ernst and Young on how to respond to HMRC regarding a query on the Ermine Street Housing company accounts.”) and replace it with

In response to a question from Councillor John Williams, the Interim Chief Executive said that Her Majesty’s Revenue and Customs service was not investigating South Cambridgeshire District Council about the Ermine Street Housing company accounts and tax arrangements. the Council had taken advice from Ernst and Young about how to respond to HMRC.

3. DECLARATIONS OF INTEREST

There were no declarations of interest.

4. ANNOUNCEMENTS

The Leader had asked Councillor Simon Crocker to chair a Cabinet Task and Finish Group to address an issue raised by the recent Peer Review. That issue related to the imminent reduction, in 2018, in the number of South Cambridgeshire District Councillors from 57 to 45. Among other things, the Task and Finish Group would need to assess the implications of such a reduction, not least in terms of the expectations placed on Councillors. It was anticipated that the Task and Finish Group would report its findings during the Summer, in time to inform the Corporate Plan process starting in Autumn 2017. The Group's membership would be representative of the entire Council.

The Leader reminded those present that Cabinet had a clear purpose in considering the matters placed before it. While he acknowledged, and welcomed, the tradition of allowing reasonable discussion, including by those not members of the Cabinet, he asked that all comments should be relevant, and as concise as possible.

5. PUBLIC QUESTIONS

There were no public questions.

6. PRIVATE SECTOR LEASING SCHEME

The Cabinet considered a report seeking the establishment of a new housing company, Shire Homes Lettings Limited, to run the Council's private sector leasing (PSL) scheme.

The Housing Portfolio Holder summarised the report, drawing particular attention to paragraphs 11 and 12, setting out the extent of councils' letting powers. She emphasised South Cambridgeshire District Council's aim of preventing homelessness, and said that the most effective way to achieve this was by offering Assured Shorthold Tenancies. As Councils were only able to offer Secure and Non-Secure Tenancies, the establishment of a Private #sector Leasing Scheme represented an innovative approach that would make affordable housing its core objective. Such a scheme also overcame the corporation tax issues that would arise with a profit-making company such as Ermine Street Housing.

Councillor Bridget Smith welcomed the proposal.

Cabinet

1. **approved** the establishment of Shire Homes Lettings Ltd as a Council owned housing company to take forward the management of the Private Sector Leasing scheme; and
2. **authorised** South Cambridgeshire District Council's Director of Housing to act as the Director of Shire Homes Lettings Ltd in order to establish the company.

7. CORPORATE PLAN 2017-2022

Cabinet considered a report on the updated Corporate Plan, and noted the Consultation Brief attached at Appendix B.

Councillor Tony Orgee (Chairman of the Scrutiny and Overview Committee) reported

verbally that Committee members had suggested that Action A (ii) should conclude by adding the words "...close to where they live". They had also suggested that the Connected Villages Action should emphasise giving support in 'our villages'. Councillor Simon Edwards urged caution, saying it was important to avoid the use of words that were too restrictive. It was agreed that Councillor Orgee and Councillor Nick Wright should agree on a form of wording outside the meeting.

Councillor Lynda Harford, Housing Portfolio Holder, proposed the following changes

- i. Action B(v): change to "find solutions for people facing homelessness"
- ii. Action B(vi): change to "Secure a viable programme future for our Council homes"
- iii. Add Action B(vii): Lead the Combined Authority's housing investment programme"

Cabinet:

- (a) **recommended** to Council that the Corporate Plan setting out the Council's vision, objectives and actions for 2017–2022, be approved as set out at Appendix A (described as Appendix 1 in the report), amended as follows:

- | | | |
|------|----------------------|---|
| i. | people facing | Action B(v): change to "find solutions for homelessness" |
| ii. | programme future for | Action B(vi): change to "Secure a viable our Council homes" |
| iii. | Authority's housing | Add Action B(vii): Lead the Combined investment programme" |

- (b) **endorsed** the indicative performance measurements set out in the draft plan and authorise the Interim Chief Executive, in consultation with Portfolio Holders, to prepare a detailed suite of Key Performance Indicators for subsequent endorsement within the first Position Report of 2017/18,

- (c) **Agreed** the Consultation Brief at **Appendix B** (described as Appendix 2 in the report) attached as the basis for an engagement exercise to inform the next Corporate Plan review, and

- (d) **Authorised** the Interim Chief Executive to make any minor wording changes required to final drafts, in consultation with the Leader of the Council.

8. **MEDIUM TERM FINANCIAL STRATEGY, GENERAL FUND BUDGET 2017-18 (INCLUDING COUNCIL TAX SETTING), HOUSING REVENUE ACCOUNT BUDGET 2017-18 (INCLUDING HOUSING RENTS), CAPITAL PROGRAMME AND TREASURY MANAGEMENT STRATEGY**

Councillor Simon Edwards, Finance and Staffing Portfolio Holder, and Councillor Lynda Harford, Housing Portfolio Holder, presented for the Cabinet's consideration a report about the Medium Term Financial Strategy (MTFS).

Councillor Tony Orgee (Chairman of the Scrutiny and Overview Committee) thanked the Finance and Staffing Portfolio Holder for an exceptionally clear presentation, and conveyed the comments from that Committee. Those comments related to

- Support for the recommended increase in Council Tax, subject to

clarification of the impact for people living in properties banded other than Band D

- Endorsement of the recommendation that the Housing Portfolio Holder approve the fees and charges for the Housing Improvement Agency, set out in Appendix A
- The need to focus on savings

The Leader asked Councillor Orgee to convey to the Scrutiny and Overview Committee his appreciation of its contribution to the consideration of this issue.

Councillor Nick Wright, Corporate and Customer Services Portfolio Holder, highlighted the difficulty in predicting the level of revenue from business rates.

Councillor Anna Bradnam asked about savings made from staff turnover. The Finance and Staffing Portfolio Holder replied by saying that savings were made by leaving posts vacant for a period of time, and then sometimes recruiting at a lower level. He denied that this was a mechanism for reducing staff numbers.

Those present considered the Council's exposure to a variety of risks and uncertainties that could affect its financial position, and delivery of the proposed budget. The essential point was to understand the risks involved, and be aware of appropriate mitigation measures.

Cabinet

1. recommended that Council:

Revenue and capital – General Fund (GF)

- (a) Approves the revenue estimates for 2017-18 as shown in the GF Budget Setting Reports (BSR) Section 5.
- (b) Approves the precautionary items for the GF, GF BSR Appendix B.
- (c) Approves the GF revenue forecasts as set out in GF BSR Section 6.
- (d) Instructs the Executive Management Team to identify additional income / savings of £163k for 2017-18, rising to £1,531k from 2018-19.
- (e) Approves the GF capital programme and associated funding up to the year ended 31 March 2022, as set out in Appendix D, subject to the deletion of the £5 million contribution to the A14 erroneously included in 2019-20.
- (f) Instructs the Head of Finance, on the basis of the proposals set out in the GF BSR, to prepare formal papers to set the council tax requirement and amount of council tax for all Bands at the Council meeting on 23 February 2017.

Revenue – Housing Revenue Account (HRA)

- (g) Approves the HRA revenue budget as shown in the HRA Summary Forecast 2016-17 to 2021-22 in Appendix I of the HRA Budget Setting Report at Appendix 2 to this report.

- (h) Approves the retention of the balance of the 4 year savings target included as part of the 2016-17 HRA Budget Setting Report to mitigate the impact of some of the changes in national housing policy, recognising that the net savings proposed from 2017-18 over-deliver against the profile of £250,000 per annum for 4 years, reducing the balance to be sought in the remaining 3 years to £600,480.

Review of Rents and Charges

- (i) Approves that social housing rents for existing tenants be reduced by 1%, in line with legislative requirements, with effect from 3rd April 2017.
- (j) Approves that affordable rents are reviewed in line with rent legislation, to ensure that rents charged are no more than 80% of market rent, with this figure then reduced by 1% as with social housing. Local policy is to cap affordable rents at the lower level of Local Housing Allowance, which will result in a rent freeze from 3rd April 2017.
- (k) Approves inflationary increases of 2.4% in garage rents for 2017-18, in line with the base rate of inflation for the year assumed in the HRA Budget Setting Report.
- (l) Approves the proposed service charges for HRA services and facilities provided to both tenants and leaseholders, as shown in Appendix B of the HRA Budget Setting Report.

Housing Capital

- (m) Approves the latest budget, spend profile and funding mix for each of the schemes in the new build programme, as detailed in Section 5 and Appendix E of the HRA Budget Setting Report, recognising the most up to date information available as each scheme progresses through the design, planning, build contract and completion process.
- (n) Approves earmarking of the required level of additional funding for new build investment between 2017-18 and 2021-22 to ensure that commitments can be met in respect of the investment of all right to buy receipts retained by the authority, up to the end of December 2016. This expenditure will either take the form of HRA new build, with the 70% top up met by capital receipts anticipated from the sale of self-build plots or could alternatively be grant made to a registered provider, where the registered provider will provide the 70% top up to build new homes.
- (o) Approves the capital budget proposals, both bids and savings, detailed in Appendix G(2) of the HRA Budget Setting Report.
- (p) Approves the capital amendments, detailed in Appendix H of the HRA Budget Setting Report, which include the capital proposals in Appendix G(2), along-side re-profiling of investment, increase and re-allocation of resource for new build schemes and budget to fund the up-front costs for self-build plots, with the latter fully met from the resulting capital receipt.
- (q) Approves the revised Housing Capital Investment Plan as shown in Appendix J of the HRA Budget Setting Report.

Treasury Management

- (r) Approves the borrowing and investment strategy for the year to March 2018, Appendix F.
- (s) Approves the prudential indicators required by the Code for Capital Finance in Local Authorities for the year to 31 March 2018, Appendix G.
- (t) Approves the Capital Strategy 2017-18 to 2021-22, Appendix H.
- (u) Approves any unspent New Homes Bonus money allocated to the City Deal to be rolled into 2018-19.

General

- (v) Gives **delegated authority** to the Interim Chief Executive to issue the final version of the Estimates Book, incorporating any amendments required from the council's decisions.

Fees and Charges

- 2. **Recommended** that the Housing Portfolio Holder approves the fees and charges for the Housing Improvement Agency as set out in GF BSR Appendix A.

Ermine Street Housing Limited (ESH)

- 3. **approved** the ESH 10-year Business Plan, attached as Appendix H (Confidential) to this report.

9. THIRD QUARTERLY POSITION STATEMENT ON FINANCE AND PERFORMANCE

Cabinet considered a report on the Council's position with regards to its General Fund, Housing Revenue Account (HRA) and Capital budgets, corporate objectives, performance indicators and strategic risks. The report also contained details of the Strategic Risk Register and Matrix attached at Appendices D and E.

The Planning Portfolio Holder highlighted the general improvement in performance within the Development /management service. There remained though a significant risk from planning decisions being taken to appeal, especially in an era of speculative applications prompted by the Council's inability to demonstrate a five-year housing land supply which, in turn, rendered several Housing policies "out-of-date". Efforts were being made to identify the number of appeals allowed against officer recommendations and Committee overturns.

The Finance and Staffing Portfolio Holder highlighted the high level of performance in terms of Council Tax and Non-Domestic Rates collection. This performance had established South Cambridgeshire District Council as the second best performing Authorities, in this regard, in the UK.

The colour coding system was open to misinterpretation, and the Interim Chief Executive undertook to discuss this with the Corporate Governance Committee, which was responsible for that system. Any change would then be discussed with Cabinet and all members of the Council before any new process was adopted.

Cabinet

- (a) **noted** the Council's provisional financial position together with the performance and risk matters and contextual information set out in the report and Appendices A, B and C attached thereto, and
- (b) **approved** the Strategic Risk Register and Matrix set out in Appendices D and E, noting the new risks identified in paragraph 27 of the report.

10. CABINET MEETING SCHEDULE 2017/2018

Cabinet agreed the following schedule of Cabinet meetings for 2017-18:

- Thursday 13 July 2017 at 6pm
- Thursday 14 September 2017 at 6pm
- Thursday 8 February 2018 at 2pm
- Thursday 19 April 2018 at 2pm

The proposed meeting on Thursday 23 November 2017 at 2pm had been scheduled by mistake and clashed with a meeting of Full Council. Officers would investigate, and report back to Members.

**The Meeting ended at 3.45
p.m.**

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Agenda Item 6

Report To: Cabinet

20 April 2017

Lead Officers: Joint Director of Planning and Economic Development
Director of Housing

Consultation Response on the Government's Housing White Paper 'Fixing our broken housing market'

Purpose

1. To agree a response to the Government's consultation on its Housing White Paper 'Fixing our broken housing market'.
2. This not a key decision because it relates to a Government consultation and it was first published in the March 2017 Forward Plan.

Recommendations

It is recommended that Cabinet agree:

- (i) the consultation response set out in Appendix A; and
- (ii) that where an identical response has been agreed by both this Council and Cambridge City Council in response to individual questions that these are included in a joint consultation response.

Reasons for Recommendations

3. The planning and housing changes proposed in the Housing White Paper will affect South Cambridgeshire and consultation responses are proposed which seek to ensure the changes are appropriate for this district. Cambridge City Council has already agreed its response to the 38 questions in the consultation and officers consider that where a common response is appropriate for both Council's it would be helpful to Government to indicate this through the submission of a joint response. The emerging Local Plans of each authority together provide a spatial framework to guide future growth across the Greater Cambridge area as a whole. Where a common response is not appropriate a separate consultation response will be submitted. Appendix A identifies where a joint response is proposed and where is separate response is proposed.

Executive Summary

4. This report summarises the main content of the Housing White Paper and proposes a response to the 38 questions included in the consultation.

Background

5. On 7 February 2017, the Government published the housing white paper *Fixing our broken housing market*. In this document, the Government sets out its plans to build more homes by:
 - a. Planning for homes in the right places, mainly through local and neighbourhood plan policies;

- b. Building homes faster, through better linkages of housing with infrastructure, addressing skills shortages and speeding up the development management process;
 - c.. Diversifying the housing market, focussing on different forms of tenure, encouraging more small and medium-sized builders, supporting housing associations and local authorities to build more homes and advocating modern methods of construction; and
 - d. Helping people now, but addressing a wide range of housing needs.
6. The white paper is a consultation paper, with the focus of the consultation on the first two of these priorities. The consultation runs from 7 February to 2 May 2017. A copy of the white paper can be viewed online at:
www.gov.uk/government/publications/fixing-our-broken-housing-market

Considerations

Key proposals – planning for homes in the right places

7. In order to plan for the right homes in the right places, the white paper puts forward the following proposals:
- Enabling spatial development strategies, produced by new combined authorities or elected Mayors, to allocate strategic sites (with agreement of all authorities);
 - Ensuring that every local authority has an up to date plan in place, with flexibility as to how the plan is set out. There would be no requirement for it to be a single local plan;
 - Introducing a standard approach to assessing housing requirements;
 - At least 10% of residential allocations in local plans should be 0.5 hectares or less;
 - Legislate to allow locally accountable New Town Development Corporations to be set up, enabling local areas to use them as a delivery vehicle if appropriate;
 - Amend national policy so that authorities should amend Green Belt boundaries only when they can demonstrate that they have fully examined all other reasonable options;
 - Local and neighbourhood plans and area action plans should set out clear design expectations and make clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans;
 - Amend national policy so that proposals should:
 - Make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements;
 - Address the particular scope for high density housing in some urban locations; and
 - Ensure that the density and form of development reflect an area's character, accessibility and infrastructure capacity.
 - Review the Nationally Described Space Standards to ensure greater local housing choice.

Key proposals – building homes faster

8. In order to build homes faster, the Government plans to invest in making the planning system more open and accessible, tackling unnecessary delays. Key proposals include:

- Amending national policy to agree local planning authorities' housing land supply on an annual basis;
- Increasing nationally set planning fees;
- Consulting on the introduction of fees for planning appeals;
- Tackling unnecessary delays by prohibiting planning conditions that do not meet the national policy tests, and by ensuring that pre-commencement conditions can only be used with the agreement of the applicant;
- Requiring applicants to provide more information about the timing and pace of new housing as part of the planning application process. This is also intended to assist the monitoring process;
- Encouraging local planning authorities to consider how realistic it is that a site will be developed when deciding whether to grant planning permission for housing on sites where previous permissions have not been implemented;
- Amending national policy to encourage local planning authorities to shorten the timescales for developers to implement permissions for housing development from three years to two years, except where shorter timescales could hinder scheme viability or deliverability;
- Simplifying and speeding up the completion notice process, whereby if development on a site has stopped and there is no prospect of completion, the local planning authority can withdraw planning permission for the remainder of the site;
- Reviewing compulsory purchase powers to deliver stalled sites;
- Introduction of a new housing delivery test for local planning authorities, with the first assessment period being for the period April 2014 to March 2017. From November 2017, where delivery is below 95% of the housing requirement, an action plan would need to be prepared setting out actions to get delivery back on track, and if delivery is below 85% of the housing requirement, authorities would need to add a 20% buffer to their five year land supply if they have not already done so. From November 2018, if delivery falls below 25% of the housing requirement, relevant policies would be deemed out of date, and a presumption in favour of sustainable development would apply. From November 2019, the presumption would apply if delivery falls below 45% of the housing requirement, and from November 2020, the presumption would apply if delivery falls below 65% of the housing requirement.

Key proposals – diversifying the market and helping people now

9. In order to open up the housing market to smaller builders and those who embrace innovative and efficient methods, the Government is proposing to:
 - Support small and medium-sized builders in growing, including through the Home Building Fund;
 - Support housing associations to build more, and explore options to encourage local authorities to build again;
 - Amend the National Planning Policy Framework (NPPF) to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. It will be for local areas to work with developers to agree an appropriate level of delivery of starter homes, alongside other affordable home ownership and rented tenures;
 - Promote Building for Rent through changes to the NPPF;
 - Amend the NPPF to allow more brownfield land to be released for developments with a high proportion of starter homes. This will be on employment sites that have been vacant for a long period of time (5 years) and are not strategic employment sites; on some leisure and retail uses; and on the Green Belt in certain circumstances;

- Through the Neighbourhood Planning Bill introduce a new statutory duty on the Secretary of State to produce guidance for local planning authorities on how they should be meeting the housing needs of older and disabled people; and
- Clarification that Starter Homes, with appropriate local connection tests, can be acceptable on rural exception sites.

Next Steps

10. The draft consultation response for consideration is set out in full in Appendix A. These responses relate to the consultation questions posed in Appendix B, the housing white paper. The questions are focused on the changes to planning policy and legislation needed as well as other proposals set out in Chapters 1 (planning for the right homes in the right places) and 2 (building homes faster) of the housing white paper.
11. Many of the changes proposed in the white paper involve changes to the NPPF. The Government intends to publish a revised NPPF later this year, which will consolidate the outcomes from previous and current consultations, for example the report of the Local Plans Expert Group. It will also incorporate amendments to reflect changes made to national policy through Written Ministerial Statements since March 2012. These are:
 - Support for small scale developers, custom and self-builders (20 November 2014);
 - Sustainable Drainage Systems (18 December 2014);
 - Starter Homes (2 March 2015);
 - Parking: helping local shops and preventing congestion (25 March 2015);
 - Housing standards: streamlining the system (25 March 2015);
 - Local Planning, which covers onshore wind farms (18 June 2015);
 - National Planning Policy Framework: technical adjustment (22 July 2015);
 - Green Belt protection and intentional unauthorised development (17 December 2015); and
 - Neighbourhood planning (17 December 2015).

A number of modifications have already been proposed to the emerging Local Plan as a result of these statements.

Options

12. With reference to the proposed consultation response Cabinet could:
 - (i) Approve it;
 - (ii) Reject it;
 - (iii) Amend parts of it;
 - (iv) Decide to submit a response to some or all of the questions from this authority only.

Implications

13. In the writing of this report, taking into account financial, legal, staffing, risk management, equality and diversity, climate change, community safety and any other key issues, the following implications have been considered: -

Financial

14. There are no direct financial implications arising from this report. The costs of preparing the Local Plan has already been budgeted for and included in the budget.

Legal

15. There are no direct legal implications arising from this report.

Staffing

16. There are no direct staffing implications arising from this report.

Risk Management

17. There are no direct risk management implications arising from this report.

Equality and Diversity

18. There are no direct equality and diversity implications arising from this report.

Climate Change

19. There are no direct climate change implications arising from this report.

Consultation responses (including from the Youth Council)

20. This report has been prepared jointly by South Cambridgeshire Planning and Housing Officers. Cambridge City Council officers were also consulted.

Effect on Strategic Objectives**Objective1 – Living Well**

21. Access to good housing is important to good health. The Local Plan seeks to meet housing needs whilst protecting the natural and built environment.

Objective 2 – Homes for our Future

22. The Housing White Paper is intended to help secure the delivery of a wide range of housing to meet the needs of existing and future communities across England.

Objective 3 – Connected Communities

23. There are no direct implications for this strategic objective.

Objective 4 – An innovative and dynamic organisation

24. The Housing White Paper is likely to result in wide ranging changes to the planning and housing functions of this Council which will require innovation and dynamism in order to deliver the best possible services to resident at the best cost.

Appendices

Appendix A: Proposed Consultation Response to the Housing White Paper

Background Papers

The following background papers were used in the preparation of this report:

National Planning Policy Framework:

<https://www.gov.uk/government/publications/national-planningpolicy-framework--2>

National Planning Practice Guidance:

<https://www.gov.uk/government/collections/planning-practiceguidance>

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Department for Communities & Local Government Consultation

Fixing our broken housing market – ‘The Housing White Paper’ South Cambridgeshire District Council’s Response

Overview of our response/Key Issues we want to get across

Introduction/Overview
In the following section the consultation questions are in bold text. Proposed responses which could be submitted in a joint response with Cambridge City Council are indicated by the word ‘ Joint ’ at the start of each response.
Q.1 – Do you agree with the proposals to:
A) Make clear in the NPPF that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area’s housing requirement?
<p>Joint</p> <p>The strategic priorities set out in paragraph 156 of the Framework require policies to provide:</p> <ul style="list-style-type: none"> • the homes and jobs needed in the area; • the provision of retail, leisure and other commercial development; • the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); • the provision of health, security, community and cultural infrastructure and other local facilities; and • climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. <p>As ‘lower tier’ authorities, a number of the strategic priorities listed are beyond the remit of the Councils’ areas of control, being the responsibility of the County Council (transport, minerals and waste). In addition, many organisations which are not local planning authorities have significant responsibilities in relation to these matters including public institutions, not-for-profit charities and privately owned companies working within a regulated market. The policy guidance in paragraph 156 can only be understood fully by reference to the definition of local planning authority in the glossary which clarifies that these strategic priorities will vary depending on the extent of their responsibilities. Given the increasing incidence of combined authorities and devolution deals, this definition may need further refinement.</p> <p>Given that many of these organisations are not public bodies (NPPF paragraph 178), Cambridge City Council and South Cambridgeshire District Council would be supportive of requirements being applicable to all organisations responsible for the strategic oversight and provision of these strategic priorities to ensure their co-operation in a timely and constructive manner regarding their respective area of responsibility to support growth and the needs of local communities.</p> <p>A proviso requiring full and timely responses to strategic matters would be welcomed by Cambridge City Council and South Cambridgeshire District Council. This condition should require any objections or serious concerns from a statutory consultee or an organisation with</p>

statutory responsibilities regarding any planning proposals during a consultation (external or internal) to be provided in a clear and timely manner; thereby allowing for the issue to be resolved or a strategy to be developed to overcome the concerns raised at an early stage of the planning process. Delays resulting from partial cooperation or late responses from statutory bodies can increase the cost of the plan-making process hindering the development of key policy areas.

B) Use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?

Joint

Some of the Spatial Development Strategies currently being considered by combined authorities are non-statutory plans. As such, there is some concern that the allocation of strategic sites through such plans would not be subject to the same local public or independent scrutiny as those identified through local plans. This is particularly important given the potential wider significant impact that the allocation of strategic sites can have. It is important that the consideration of strategic sites takes place alongside other elements of the plan-making process such as Sustainability Appraisal, Infrastructure Planning and Strategic Flood Risk Assessment. There would also need to be a very clear definition of what constitutes a 'strategic site'.

C) Revise the NPPF to tighten the definition of what evidence is required to support a 'sound' plan?

Joint

The content of all Local Plans vary according to their area and local circumstances. A pragmatic approach would therefore be supported which allowed the Councils to produce the evidence they consider to be necessary. However, given the increasing opportunities to develop strategies with different partner organisations and the need to produce cost effective plans, Cambridge City Council and South Cambridgeshire District Council would welcome a 'tightened' definition which outlines the minimum requirement for its evidence base regarding its strategic policy areas such as housing, employment, Green Belt and open spaces, flooding and climate change, and rural and urban centres, where applicable. A degree of flexibility would remain for the Councils to then decide what other evidence would be appropriate and reasonable for the remaining policy areas.

Q.2 – What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?

Joint

Advances in technology now allow Councils to use an array of different media to consult on Local Plan related matters. This also means there are more ways to gather responses in a more efficient manner by digital media, however there is no obligation on the part of consultees to respond via digital media. There have been instances during the Local Plan process where local communities have submitted a considerable volume of paper representations to numerous consultation questions. These representations require a considerable amount of resources to properly collate and manage them. One recommendation is to require responses from all statutory and non-statutory organisations to be submitted in digital format. This would allow more resources to be deployed to record any paper representations submitted by individuals, recognising that some individuals would prefer this format to digital media.

In terms of the examination process, it must be recognised that the determination of planning applications will not wait for the outcome of a prolonged Local Plan examination procedure. Consideration should be given, in whole Local Plan examinations, to enabling Inspectors to identify at an early stage whether the strategic policies of a plan are sound before proceeding to examine development management policies and/or non-strategic allocations. In this way, planning applications could be assessed against an up-to-date locally relevant strategy rather than an out of date strategy.

Q.3 – Do you agree with the proposals to:
A) Amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?
<p>Cambridge City Council and South Cambridgeshire District Council would be supportive of this approach and have already included policies related to accessibility standards and specialist housing within our emerging Local Plans. We would also be supportive of the continuation of the nationally described space standard. By ensuring that new homes are built to baseline Building Regulations Part M requirements, these homes would have sufficient space to enable residents to meet their day to day needs. Such homes are also more capable of being adapted to changes in personal circumstances. Following the withdrawal of the HCA space standards for affordable housing, it is particularly important that there is a nationally recognised space standard for affordable housing to ensure rooms are large enough to maximise occupancy rates in line with Local Housing Allowance criteria. There is also concern that without a space standard requirement for affordable housing, registered providers may be reluctant to take on the affordable housing element of S.106 sites if the room sizes are considered too small.</p> <p>Policies need to cover not just older people and those with physical disabilities, but also those requiring more specialist supported housing, such as hostels, care homes, extra care housing and other forms of supported housing which require additional design features.</p> <p>Planning policies are only part of the solution. The Government's proposed new model for funding supported housing must be developed in a way that gives providers long-term financial certainty, if they are to be encouraged to bring new schemes forward.</p>
B) From early 2018, use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations and monitoring housing delivery, in the absence of an up to date plan.
<p>Joint</p> <p>The introduction of the standardised approach will need to include clear transitional guidelines as to how those local plans that are currently at an advanced stage, at examination for example, will be dealt with. Requiring such plans to take on the new standardised approach could result in considerable delay and costs for the local planning authority concerned. The NPPF should provide a clear definition of what is an up-to-date plan, and no plan should be considered to be out of date for at least a two year period after adoption. Without such clarity, the issue of whether a plan is up to date will lead to extensive argument at s78 appeal inquiries. Cambridge City Council and South Cambridgeshire District Council's Local Plans have been at examination since March 2014. These examinations include the full objectively assessed housing need figures for both authorities. It would be unfortunate if either plan were to be out of date soon after their adoption due to the length of the examination process. A standardised approach should also be introduced to assess requirements of housing of all types for particular groups, including older people and those with physical and/or other disabilities.</p>
Q.4 – Do you agree with the proposals to amend the presumption in favour of sustainable development so that:
A) Authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?
<p>Joint</p> <p>Cambridge City Council and South Cambridgeshire District Council would be supportive of the aim to maximise the use of suitable land. However, sufficient flexibility should be permitted to allow the strategy to respond to local opportunities and constraints including landscape and environmental considerations and local infrastructure capacity. Furthermore, it is likely that this will result in discussion at application and appeal regarding what 'clear', 'suitable' and 'maximising' mean.</p>

B) It makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?
<p>Joint</p> <p>Cambridge City Council and South Cambridgeshire District Council would be supportive of the requirement if the description of 'identified need' can be locally defined otherwise this may lead to confusion as to what is meant by the term, i.e. just considering housing in isolation of other needs.</p>
C) The list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the NPPF (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?
<p>Joint</p> <p>Cambridge City Council and South Cambridgeshire District Council would be supportive of the addition of Ancient Woodland and aged/veteran trees to footnote 9 of the Framework. With regards to the reference to locations at risk of flooding, specific reference should be made to the fact that no development in the highly vulnerable, more and less vulnerable flood risk categories should be permitted in Flood Zone 3b (functional flood plain). More generally though, the Councils are concerned about this being presented as a closed list. Other examples of issues which arise include unstable and contaminated land.</p>
D) Its considerations are re-ordered and numbered, the opening text is simplified and specific references to local plans removed?
No comment.
Q.5 – Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with the benefits of planning consent which they have granted to themselves?
<p>Joint</p> <p>Cambridge City Council and South Cambridgeshire District Council would be supportive of this as it should assist in bringing forward publicly owned land for development.</p>
Q.6 – How could land pooling make a more effective contribution to assembling land, and what additional powers or capacity would allow local authorities to play a more active role in land assembly (such as where 'ransom strips' delay or prevent development)?
<p>Joint</p> <p>Cambridge City Council and South Cambridgeshire District Council are supportive of this in general but have no suggestions regarding additional powers or capacities that may be needed.</p>
Q.7 – Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?
<p>Joint</p> <p>While estate regeneration can be a useful means by which to deliver additional housing, it is important to ensure that such an approach does not lead to the fragmentation and dispersal of existing communities or to a loss of affordable homes. This can be a particular concern in areas proposed for regeneration with high proportions of existing social housing. As part of any proposals for estate regeneration, measures must be put in place to ensure that existing residents are not displaced by development. In addition to the social and economic benefits, national policy should also give consideration to the potential environmental benefits of estate regeneration. This could include addressing existing areas at risk of flooding through the use of sustainable drainage systems, enhancing the energy efficiency of homes and urban greening, which will help to futureproof communities against our changing climate. Improvements to the quality and maintenance of the public realm and open spaces should also be encouraged in such regeneration initiatives.</p>
Q.8 – Do you agree with the proposals to amend the National Planning Policy

Framework to:
A) Highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?
Yes, such allocations can help to address local housing needs in locations acceptable to individual communities, but this must provide robust protection to that community from unplanned speculative housing development proposals. Identifying suitable sites for development can be difficult for communities given the risk of challenge from developers whose sites have not been allocated in the plan. In this regard we welcome the recent changes to the neighbourhood planning grant eligibility criteria where more grant funding is available for those local communities who are considering site allocations within their neighbourhood plans.
B) Encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority's housing needs?
<p>Joint</p> <p>Development in more sustainable villages plays an important role in the development strategy for the Greater Cambridge area. The emerging South Cambridgeshire Local Plan includes village site housing allocations to provide flexibility and to help ensure a continuous supply of housing land over the plan period. It also recognises the role that such villages play in their locality. Nevertheless, it is important to balance the benefits of development in villages with the impacts that more dispersed patterns of development can have, including transport implications. Village development is also unlikely to be of a scale that would support greater investment in public transport and community and education facilities, leading to unsustainable patterns of transport focussed on the private car. As such, while the Councils are supportive of the role that development in more sustainable village locations can play in meeting an area's housing need, the overall capacity of village housing allocations should remain proportional to their scale and accessibility in the interests of achieving sustainable patterns of development.</p>
C) Give stronger support for 'rural exception' sites – to make clear that these should be considered positively where they can contribute to meeting identified local housing needs, even if this relies on an element of general market housing to ensure that homes are genuinely affordable for local people?
<p>Joint</p> <p>Through the Greater Cambridge City Deal, partners have committed to delivering an additional 1,000 homes on rural exception sites and other windfall sites by 2031. While these do not count towards the Councils' objectively assessed housing need, they still play an important role in delivering affordable housing in the Greater Cambridge area. The availability of suitable sites and the willingness of landowners to sell the land is the key to their deliverability and the proposed measures would be likely to encourage more land to come forward.</p> <p>The Council welcomes the emphasis on stronger support for 'rural exception' sites that provide affordable homes for local people. We acknowledge that an element of general market housing is sometimes necessary to make schemes viable and deliverable. Greater emphasis that rural exception sites should be considered positively where they can contribute to meeting identified local housing needs is welcomed. It would be helpful for this to be made clear within the NPPF.</p>
D) Make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less?
<p>Joint</p> <p>It is unclear whether this is a reference to 10% of sites or to 10% of the required additional housing capacity. If the former, it could be very modest in a district proposing new settlements, if the latter, it could amount to a large number of small sites which could be</p>

<p>onerous to allocate for development. In urban areas, such sites will usually be previously developed land and so are likely to benefit from permission in principle in any event. As part of the site allocation process, each site would need to be assessed against a series of criteria which would lead to further resource requirements for the Councils. Sites under 0.5 ha may include sites that have a particular constraint that may need to be overcome before development can proceed. A policy allocation may reduce the cost of borrowing by providing greater policy certainty, subject to any site constraints.</p>
<p>E) Expect local planning authorities to work with developers to encourage the sub-division of large sites?</p>
<p>Joint This measure is supported.</p>
<p>F) Encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?</p>
<p>While the Councils have experience of working with the development industry to develop site wide design codes, the production of design codes and local development orders can be very resource intensive and time consuming for local planning authorities. Their production requires the input from local authority planners, urban designers, landscape architects and sustainable drainage engineers in order to ensure the delivery of quality outcomes. The level of detail or 'resolution' in design codes needs to be considered so as not to stifle innovation and creativity. Highly prescriptive codes can work to ensure consistency between adjacent developers on large sites but may not be appropriate on the smaller sites also identified in the White Paper. The reliance on codes does little to promote innovative design and push developers towards using architects and other design professionals. Design codes do not in themselves ensure that development comes forward more quickly. Decision making processes need to be clarified/streamlined such as the use of delegated powers to approve code compliant schemes.</p> <p>Local development Orders have the potential if combined with good design codes to speed the planning process but require a lot of resources upfront from a local authority and from developers.</p>
<p>Q.9 – How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?</p>
<p>Joint South Cambridgeshire District Council has direct experience in positively planning for new settlements within its area. Our experience demonstrates that these developer-led settlements can take many years from the initial proposal in a development plan to the first dwellings being occupied. While the proposed changes are welcomed, it will remain the case that many local planning authorities will not wish to bring such developments forward because of the risks they pose to maintenance of a 5 year housing land supply over the plan period. To reduce this risk, the NPPF should state that, where such developments are included in a plan, 5 year housing land supply calculations should be calculated using the Liverpool methodology rather than the Sedgefield methodology (the 'Liverpool approach' is to seek to meet any backlog over the whole plan period. It is also known as the residual approach. The 'Sedgefield approach' is to front load the provision of this backlog within the first five years).</p>
<p>Q.10 – Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:</p>
<p>A) Authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?</p>
<p>Joint Cambridge City Council and South Cambridgeshire District Council would be supportive of this clarification in the NPPF</p>

B) Where land is removed from the Green Belt, local policies should require compensatory improvements to the environment quality or accessibility of remaining Green Belt land?
<p>Joint</p> <p>Cambridge City Council and South Cambridgeshire District Council would be supportive of the principle, but this is logistically difficult. The suggestions put forward in the White Paper (community forests, nature reserves or allotments) do not reflect the local characteristics of Green Belt where often it is undeveloped agricultural land that is generally not accessible to the public. It may neither be feasible, viable or environmentally appropriate to provide compensatory measures in the immediate vicinity of where Green Belt land is lost as different landowners may be involved.</p>
C) Appropriate facilities for existing cemeteries should not be regarded as ‘inappropriate development’ in the Green Belt?
<p>Joint</p> <p>The Councils would support further clarification as to whether recreational uses such as playing pitches are inappropriate development in the Green Belt, given the judgement in the Court of Appeal of <i>Timmins & ANOR, R (on the application of) v Gedling Borough Council</i> [2015] EWCA Civ 10 (22nd January 2015). Agree that appropriate facilities for existing cemeteries should not be regarded as ‘inappropriate development’ in the Green Belt.</p>
D) Development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?
<p>Joint</p> <p>Proposals brought forward through Neighbourhood Development Orders must still be in general conformity with the strategic policies of the development plan and the Basic Conditions set out by legislation. This should give an indication of the scale of development which may be acceptable even if only by describing it as small scale.</p>
E) Where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question?
<p>Joint</p> <p>Yes, proposals for boundary amendments brought forward through neighbourhood plans must still comply with the strategic policies of the development plan and the Basic Conditions set out by legislation.</p>
F) When carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs?
<p>Joint</p> <p>This approach may be too simplistic especially as the definition of previously developed land could be interpreted to be any form of development such as playing fields or a small sports building. There may also be other factors that need to be considered such as the landscaping and setting of the town or city surrounded by Green Belt. The Councils are of the view that Green Belt serves an important role and any study that considers re-designating land or removing land from the Green Belt should consider areas which will minimise impacts on the important functions that the Green Belt designation was intended to serve. Similarly, the Councils consider reference to previously developed land and/or land which surround transport hubs in the Green Belt as too simplistic in any first step at rolling back this designation. Guidance here should be more specific on what is intended. Park and Ride sites for example should not be included in the definition of transport hubs.</p>
Q.11 – Are there particular options for accommodating development that national policy should expect authorities to have explored fully before Green Belt boundaries are amended, in addition to the ones set out above?
<p>Joint</p> <p>The Councils consider that authorities could be required to explore sites with deliverability</p>

issues to understand why sites have not or cannot come forward.
Q.12 – Do you agree with the proposals to amend the NPPF to:
A) Indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought?
<p>Joint</p> <p>It is important that, unless a requirement is already stated in an adopted strategic policy, figures relating to a housing requirement for a particular settlement have regard to local infrastructure capacity and environmental considerations. If a housing requirement figure was provided this would need to be considered achievable in principle and not simply based upon an apportioned figure from the strategic policy.</p>
B) Make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?;
<p>Joint</p> <p>It is considered that the development of clear design expectations is best dealt with through site specific planning development brief type documents as opposed to through local plans. While local plans are able to set general design policies and principles related to the design considerations needed to deliver high quality sustainable development, successful design is something that understands and then responds to the context in which a development is located. As such, the setting of higher level but clear design quality expectations is best achieved through documents such as Neighbourhood Plans and Area Action Plans. Site Specific Supplementary Planning Documents, which enable the more detailed consideration of context, can also play a crucial role in articulating development principles and in so doing engender support from local communities for development proposals. It should be recognised that neighbourhood planning groups are unlikely to have the expertise to be able to produce design guidance and that they will need help to achieve this. The complexity and appropriateness of a design approach may not fit with the ambitions to make more efficient use of land or deliver the type and mix of housing that an area needs. Design codes are not purely 'visual tools' but also compile technical information and identify mandatory and discretionary elements that need to be factored into the design of new development (see 'Design Codes: A Practice Manual, November 2006 that followed on from the Design Coding pilot studies undertaken by the DCLG in 2006). The ability to 'break the code' should also be considered where the principles set out in the code can be effectively challenged. Design codes need to work alongside urban design guidelines, detailed masterplans, village design statements, site briefs, conservation area appraisals and community participation techniques, along with more general design guidance that provides an understanding of how the particular characters and qualities of buildings and places within an authority/region can help to inform how new development proposals, particularly on smaller sites, can respond appropriately to the prevailing character of an area. The production of such documents can and should involve significant community participation.</p>
C) Emphasise the importance of early pre-application discussions between applicants, authorities and the local community about design and the type of homes to be provided?
<p>Joint</p> <p>Cambridge City Council and South Cambridgeshire District Council support this proposal.</p>
D) Makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans?
<p>Joint</p> <p>Design is a complex area and not purely an aesthetic consideration. For example, functional design can play a significant and important role in determining the way in which a place functions and safeguard against the degradation of public spaces by rogue parking, poorly located bin storage and ineffective cycle parking. In such circumstances, it would be entirely</p>

appropriate to refuse a scheme on such grounds. Where 'aesthetic' considerations are considered, design can become a more subjective issue and the LPA needs to be mindful of Paragraph 60 of the NPPF. Contemporary designs that successfully contrast with the surrounding area are a good example of where subjective judgement may stifle innovative designs and construction techniques.
E) Recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process?
Widely accepted design standards, such as Building for Life, can help in the assessment of design quality but are only as good as the person assessing the scheme. Questions can be so general that it is often difficult to 'fail' an assessment. We would advocate a 'design led' approach using appropriately skilled experts to deliver and drive up the quality of schemes particularly from the volume housebuilders. Such an approach requires appropriately skilled professionals within the LPA to engage with and proactively produce high quality outcomes rather than relying on assessment techniques that are usually applied towards the end of the design process. Guidance should advocate their use from the pre-application stage. The NPPF also refers to the need for decision makers to take Design Review Panel comments into account. However, this means that members of design panels need the skills to make recommendations which reflect the Councils' positive approach to growth.
Q.13 – Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:
A) Make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?
Joint It is important to make efficient use of land but the location and density of development needs to relate well to existing or proposed infrastructure and to local character. The higher the density of development, the more crucial that functional design issues such as bins, bicycles, cars are well resolved and the less likely that 'pattern book' type development will be appropriate. Access to usable public open space, as well as private amenity space is also crucial considerations and can be more challenging at higher densities. A thorough understanding of the context to development proposals is needed to ensure that development proposals do not adversely impact on the areas around them.
B) Address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?
Joint Densities need to be considered as 'profiles' related to accessibility to transport and shops and services. It is important to understand how the new development fits into the range and mix of existing development in an area and to consider the cumulative impact of multiple higher density schemes in a given area to help deliver mixed and balanced communities. Well designed and appropriately located higher density development can reduce car dependence and sustain public transport routes and shops and other services and lead to the creation of 'walkable neighbourhoods' as well as extending the range of housing types available. Such an approach can help people stay within an area to upsize or downsize according to need. Higher density proposals will sustain a mix of uses adding to the viability and vitality of urban areas and reference to this should be made to in policy. It is important to understand that 'density' should not be confused with 'height' as different development models can create different design outcomes whilst achieving the same or similar densities.
C) Ensure that in doing so the density and form of development reflect the character accessibility and infrastructure capacity of an area, and the nature of local housing needs?
Joint Agree this is part of creating context aware development. However it would not be

acceptable for considerations of character, accessibility and infrastructure to only apply to scoping urban areas for locations suitable for high density housing development. These same considerations will often point to lower density form of development being suitable in rural village locations and any guidance relating to these considerations must recognise this.

D) Take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?

Joint

Open space is not just about the quantity but quality of provision so some flexibility in provision is clearly needed, depending on the particular circumstances of a development proposal. While the Councils recognise that there is a need for some flexibility in open space provision, many studies have demonstrated the health and wellbeing benefits of access to both public and private amenity space as part of new developments. This is in addition to the role that well-designed multifunctional open space can play in enhancing the desirability of new developments and providing for features such as sustainable drainage. In considering the role of existing nearby open spaces, consideration needs to be given to the nature of these spaces, their sensitivity to increased recreational demand (e.g. wildlife sites) and the demand already placed upon them. It may not be possible for existing open spaces to absorb the pressure of additional high density development, and as such it is important that all new developments include quality open space provision to meet the needs of their residents. Where space is at a premium, open space provision should be increasingly multifunctional, and consideration should also be given to other forms of open space such as roof terraces, balconies and urban allotments/community gardens. Through the provision of high quality open space to support higher density developments, the Councils can deliver housing on brownfield sites.

Consideration must also be given in guidance to the accessibility of open spaces by unaccompanied children both in terms of distance and safety.

Q.14 – In what types of location would indicative minimum density standards be helpful, and what should those standards be?

Joint

While the Councils recognise the importance of making efficient use of land and look to deliver housing at appropriate densities to support growth, in some cases, especially on smaller sites, achieving a prescribed density that balances against other planning, highways and design matters may be challenging. The appropriate density of any scheme will depend upon a range of factors including the context of the site, the prevailing character and the overall location of a scheme, along with the type of development proposed. Previous national planning policy setting minimum density requirements, notably Planning Policy Statement 3, which set a minimum density of 30 dwellings per hectare, was criticised for not being design or context driven but did ensure that more efficient use of land was made. As such, it is considered that it would be difficult to set a national requirement for minimum density standards by location. The setting of density requirements should be left to local planning authorities through the development of site specific planning policies or through the development of Area Action Plans or other forms of planning guidance such as parameter plans for specific sites taking full account of context, transport and other planning considerations.

Q.15 – What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?

Joint

As referenced in our response to question 14, the Councils support the intensification/densification of land use on sites. This needs to be informed by an understanding of context and consideration of other planning, highways and design matters and is not simply a question of whether land is in the public sector. It is considered that the

focus of national policy should be on providing general support for land intensification/densification without setting specific requirements for particular categories of land.
Q.16 – Do you agree that:
A) Where local planning authorities wish to agree their housing land supply for a one year period, national policy should require those authorities to maintain a 10% buffer on their 5 year housing land supply?
<p>Joint</p> <p>Further explanation on how this mechanism will operate should be published and consulted on before this is brought into operation. The guidance should include recommended minimum requirements for engaging with the development industry and infrastructure providers and provisions for what will happen in the event of one or both of these sectors not engaging in the process. The NPPF currently requires authorities with a 5 year housing land supply to maintain a 5% buffer, the logic of increasing this buffer by 100% to benefit from this protection is not adequately explained neither is the process by which this housing land supply would be tested by the Planning Inspectorate (PINS). It is suggested that this mechanism be robustly road tested by PINS to ensure that it is effective, proportionate and that it is capable of being resourced by PINS on a national basis.</p>
B) The Planning Inspectorate should consider and agree an authority's assessment of its housing supply for the purpose of this policy?
<p>Joint</p> <p>The Councils agree with this proposal and considers that the decision of the Planning Inspectorate should be considered to be definitive in regard to known sites, although subsequent planning permissions granted within the following year should be counted in 5 year housing supply calculations. If found not to have such a supply, this would allow a local planning authority to know that it can count on sites already considered in the Planning Inspectorate's consideration without fresh challenge at a s78 appeal.</p>
C) If so, should the inspectorate's consideration focus on whether the approach pursued by the authority in establishing the land supply position is robust, or should the Inspectorate make an assessment of the supply figure?
<p>Joint</p> <p>If the assessment has been undertaken in consultation with the development industry and infrastructure providers then the consideration should focus on the approach taken. However, it is acknowledged that there may be occasions when the development industry and local planning authority cannot agree, in which case it will be necessary for the Planning Inspectorate to undertake a more robust examination of the assessment itself. Often challenges to housing supply evidence are made by out-of-area development enabling companies rather than by local development companies.</p>
Q.17 – In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12 December 2016 into the revised NPPF, do you agree that it should include the following amendments:
A) A requirement for the neighbourhood plan to meet its share of local housing need?
<p>Joint</p> <p>It must be recognised that there will be some instances where a neighbourhood plan is prepared for an area where there is little scope or need for an additional housing, such as a constrained urban area with little opportunity or a remote small village with no services or facilities. In such instances, it must be acknowledged that the neighbourhood plan's fair share of housing might be for no planned development at all. Furthermore, the NPPF's wording should not give rise to a need for the local planning authority to prepare a document sharing out housing need across all the communities in its district which is unnecessary and likely to be unhelpful.</p>
B) That it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018; 45% in 2019) for the wider authority area?

<p>Joint</p> <p>This requirement may penalise a local community that has invested considerable time and money in the preparation of a neighbourhood plan for the local area. There is little incentive to produce a neighbourhood plan in a local planning authority area that has persistently under-delivered and is not actively bringing forward an up-to-date local plan in a timely manner. It is considered that this requirement should not be included in the NPPF.</p>
<p>C) Should it remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need?</p>
<p>Joint</p> <p>The protection should apply as long as the neighbourhood plan development strategy and housing policies will meet the fair share of the local housing need. Neighbourhood planning volunteers do not always have the skills or resources to make allocations and may not want to propose potentially unpopular allocations. The wording should avoid creating scope for arguments about what is the right share of local housing need to be accommodated.</p>
<p>Q.18 – What are your views on the merits of introducing a fee for making a planning appeal? We would welcome your views on:</p>
<p>A) How the fee could be designed in such a way that it did not discourage developers, particularly smaller and medium sized firms, from bring forward legitimate appeals;</p>
<p>Joint</p> <p>Generally, smaller scale development is promoted by smaller developers. A scale of fees based on size of development could address this.</p>
<p>B) The level of the fee and whether it could be refunded in certain circumstances, such as when an appeal is successful; and</p>
<p>Joint</p> <p>The level of fee should address the administrative costs of dealing with an appeal based on an assessment of these costs. This element of the fee would be retained whatever the outcome. It is not clear whether the fee would go to the local planning authority or the Planning Inspectorate or both organisations. Refunds of fees generally add an administrative burden to local planning authorities.</p>
<p>C) Whether there could be lower fees for less complex cases.</p>
<p>Joint</p> <p>There could be lower fees for less complex cases if the system was based on the cost to the local planning authority and the Planning Inspectorate in dealing with appeals.</p>
<p>Q.19 – Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?</p>
<p>Joint</p> <p>While Cambridge City Council and South Cambridgeshire District Council both have emerging policies to support the delivery of high quality digital infrastructure, this can only be delivered with the full cooperation of broadband suppliers. As with other forms of infrastructure, there is a need for utilities providers to work proactively with local planning authorities to plan for and deliver in a timely fashion the infrastructure required to support growth. As such, we welcome the reference in paragraph 2.24 to the need for investment in utilities provision to align with local development plans, speeding up timely connections for new homes and non-residential development. Cambridgeshire authorities are in the process of setting up a Utilities Forum to establish more effective engagement and communication between local authorities and the relevant utilities providers to identify, understand and act upon relevant planning and growth issues. If successful, this approach could help provide a more proactive, strategic approach to planning for infrastructure requirements to support the growth agenda and speed up delivery. However, if the approach is to work, it will require high level commitment from the utilities providers as well as more flexibility in the regulatory requirements governing infrastructure provision.</p>

Q.20 – Do you agree with the proposals to amend national policy so that:
<ul style="list-style-type: none"> The status of endorsed recommendations of the National Infrastructure Commission is made clear? And Authorities are expected to identify the additional development opportunities which strategic infrastructure improvements offer for making additional land available for housing?
<p>Joint</p> <p>It is important to remember that the planning and delivery of strategic infrastructure can take many years before it comes to fruition. As such and subject to the usual viability, feasibility and deliverability considerations, while additional development opportunities arising from strategic infrastructure improvements could potentially be identified, it would be erroneous to specify in a local plan when such development could come forward until the improvements have been funded and timetabled. The Councils consider that there is a balance that needs to be struck between being 'expected to identify' and an alternative option of being 'expected to consider and where viable, feasible and deliverable identify.'</p>
Q.21 – Do you agree that:
A) The planning application form should be amended to include a request for the estimated start date and build out rate for proposals for housing?
<p>Joint</p> <p>While this information would be helpful, the information would have little worth if the developers were not held to account for the information that they provide or if the decision making process were delayed due, for example, to an appeal or extended period of time required to sign a Section 106 agreement. Many applications are made by companies who specialise in gaining planning permission with the intention of selling the site on to a housebuilder who will then often submit a new planning application to amend the layout and housing numbers and design.</p>
B) That developers should be required to provide local authorities with basic information (in terms of actual and projected build out) on progress in delivering the permitted number of homes, after planning permission has been granted?
<p>This information is not currently required to be provided to local authorities except through the Building Regulations process of commencement and completion notices. Cambridge City Council and South Cambridgeshire District Council currently ask developers / landowners for this information annually to inform the preparation of our housing trajectories, and many developers / landowners do provide the information but some do not. A requirement to provide this information would make it easier to prepare the housing trajectory and undertake land availability assessments. Developers should be informed that this information will be made public.</p>
C) The basic information (above) should be published as part of Authority Monitoring Reports?
<p>The basic information about projected build-out rates received from developers / landowners is already published (in summary form) as part of the Councils' housing trajectories. However, in some instances the Council may consider a different delivery timescale or delivery rate more appropriate and robust for inclusion in the housing trajectory, than that provided by the developer. The Councils currently record any differences between their assumptions and the developer / landowners assumptions in the commentary accompanying the housing trajectories.</p>
D) That large housebuilders should be required to provide aggregate information on build out rates?
<p>Joint</p> <p>For consistency in monitoring development delivery, information by planning application numbers and land parcels is preferred. It gives a better view of how a large site is developing and can also identify where build may slow down e.g. due to lack of infrastructure or by change in land type.</p>
Q.22 – Do you agree that the realistic prospect that housing will be built on a site

should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development?
<p>Joint</p> <p>The decision on a planning application should remain informed by its conformity with the NPPF, the development plan and any other material considerations. The definition of “realistic prospect” would need to be set out clearly if this approach were to be pursued in order to avoid lengthy legal arguments and planning appeals.</p>
Q.23 – We would welcome views on whether an applicant’s track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.
<p>Joint</p> <p>It is considered inappropriate to take an applicant’s track record into account. There would be nothing to prevent an applicant gaining planning consent and then selling the consent to a developer with a poor track record.</p>
Q.24 – If this proposal were taken forward, do you agree that the track record of an applicant should only be taken into account when considering proposals for large scale sites, so as not to deter new entrants to the market?
<p>Joint</p> <p>It is considered inappropriate to take an applicant’s track record into account. There would be nothing to prevent an applicant gaining planning consent and then selling the consent to a developer with a poor track record.</p>
Q.25 – What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.
<p>Joint</p> <p>This could result in a further workload for local planning authorities in assessing and reviewing viability and deliverability exceptions. The requirement, if it is to be introduced, should remain consistent for all.</p>
Q.26 –Do you agree with the proposals to amend legislation to simplify and speed up the process of serving a completion notice by removing the requirement for the Secretary of State to confirm a completion notice before it can take effect?
<p>Joint</p> <p>The removal of this requirement is welcomed. However, greater use of these powers will only be successful if local planning authorities have the skills and resources to take them forward.</p>
Q.27 – What are your views on whether we should allow local authorities to serve a completion notice on a site before the commencement deadline has elapsed, but only where works have begun? What impact do you think this will have on lenders’ willingness to lend to developers?
<p>Joint</p> <p>Yes, this should be facilitated. The impact on lenders is not known.</p>
Q.28 – Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that:
A) The baseline for assessing housing delivery should be a local planning authority’s annual housing requirement where this is set out in an up to date plan?
<p>Joint</p> <p>This is an acceptable approach.</p>
B) The baseline where no local plan is in place should be the published household projections until 2018/19,with the new standard methodology for assessing housing requirements providing the baseline thereafter?
<p>Joint</p>

This is an acceptable approach.
C) Net annual housing additions should be used to measure housing delivery?
Joint Yes, net annual completions should be the standard form of measuring housing delivery.
D) Delivery will be assessed over a rolling three year period, starting with 2014/15 – 2016/17?
This is an acceptable approach.
Q.29 – Do you agree that the consequences for under delivery should be:
A) From November 2017, an expectation that local planning authorities prepare an action plan where delivery falls below 95% of the authority's annual housing requirement?
B) From November 2017, a 20% buffer on top of the requirement to maintain a five year housing land supply where delivery falls below 85%?
C) From November 2018, application of the presumption in favour of sustainable development where delivery falls below 25%;
D) From November 2019, application of the presumption in favour of sustainable development where delivery falls below 45%?; and
E) From November 2020, application of the presumption in favour of sustainable development where delivery falls below 65%?
<p>The Government should reserve power to suspend and modify these percentages to take account of national and local circumstances and to ensure the primacy of the plan-led system nationally (for example in the event of another recession). Furthermore, local planning authorities should be able to demonstrate that if the shortfall is due to circumstances outside their control (e.g. a national or international economic downturn), and they have made every positive effort to ensure that housing in their area is delivered, then the presumption in favour of sustainable development should not be applied. The Councils recognise, however, that local planning authorities should still be required to actively seek to maximise housing delivery.</p> <p>The Councils are concerned that up front delivery of housing at the start of their plan period at well above the annual requirement to enable demonstration of a five year supply, could result in a Council being penalised at the end of the plan period against the housing delivery test when housing delivery is likely to fall well below the annual requirement. This is the situation likely to be faced by Cambridge in coming years. Some credit needs to be given to the cumulative level of housing delivery over the whole plan period. If this is not done affected Councils may seek to hold development back at the start of the plan period in order to maintain supply towards the end. This would be contrary to the general intentions of Government to boost housing delivery in the short term.</p> <p>It is also not clear how the housing delivery test and five year supply requirements will work together or even if they can.</p> <p>The Councils are concerned that assessing delivery against the proposed housing delivery test and the five year housing land supply could in some instances lead to confusion as the actions required will be different and may be in conflict. For example, a Council who cannot demonstrate a five year housing land supply when assessed against the Sedgfield methodology and a 20% buffer, will qualify for the presumption in favour of sustainable development test being applied to its policies. But the same Council may be able to demonstrate a rolling three year annual delivery of 45% or more (from November 2019 for example) and so not be subject to the presumption in favour of sustainable development on the housing delivery test. This situation will lead to confusion, and will be exploited by speculative developers. The reverse situation could also be the case, where an authority looking backward at delivery qualifies for the presumption in favour of sustainable development test being applied to its policies, and yet when looking forward (the 5 year</p>

housing land supply test) does not qualify (for example where there is a large deliverable housing supply about to come on stream).

In practical terms the evidence included in the HWP on the massive growth in planning permissions since 2009/10 (HMP figure 4) indicates that there is no shortage of land for housing development and the main problem is one of delivery. This being so whilst local planning authorities should still have to maintain a 5 year housing land supply to adopt a sound Local Plan, the risk of the imposition of the 'presumption in favour of sustainable development' test should no longer apply after plan adoption except where there has been a failure to meet the housing delivery test.

Q.30 – What support would be most helpful to local planning authorities in increasing housing delivery in their areas?

The Councils welcome the support for small and medium sized builders to grow. As a vanguard self and custom build Council South Cambridgeshire recognises the importance of SME builders and are actively identifying small plots of Council land to make available for self build. The expectation for local planning authorities to work with developers to encourage the sub-division of large sites should help to accelerate delivery and de-risk large sites from stalling.

We are also very interested in accelerated construction, especially through offsite manufacturing. South Cambridgeshire District Council is planning to pilot a small modular constructed scheme to test the market. Sharing of good practice and expertise would be helpful to the Council in developing this further.

The Councils would also welcome a proactive response to the issue of shortage of experienced planners in growth areas.

In respect of the provision for affordable housing, the proposal to seek a rent policy in consultation with the sector would be highly welcomed. This should provide certainty and long term commitment to give providers the confidence to invest in future development.

The Councils very much welcome the Government's intentions to support local authorities in delivering new homes, and in looking at bespoke housing deals with local authorities in high demand areas. South Cambridgeshire has previously raised concerns in terms of the timescales for the use of Right to Buy receipts and the Council's borrowing capacity and would welcome the opportunity to discuss a locally negotiated agreement that would support the Council in delivering more homes.

Q.31 – Do you agree with our proposals to:

A) Amend national policy to revise the definition of affordable housing as set out in Box 4?;

South Cambridgeshire District Council welcomes the widening of choice in relation to the proposed definition of affordable housing. This will enable the Council to provide a range of products that will continue to help meet the needs of those on the lowest of incomes, but also recognises the need to diversify its affordable housing offer to meet the needs of those on average incomes who are currently priced out of the market.

Local authorities should have the flexibility to identify the mix of affordable housing required to meet local housing needs based on affordability in their area.

Specific comments to the proposed definition include:

Affordable rented housing : in order to differentiate this product from Intermediate rented housing, we would like to see that Affordable Rented Housing should have some provision that rents should also be limited to the Local Housing Allowance of the Broad Market Rental Area. This will ensure that this product is affordable for those in receipt of housing benefit.

Discounted market sales housing : The principle of a discounted market sale is welcomed so long as it includes provisions to remain at a discount for future eligible households. South Cambridgeshire District Council has developed its own equity share model where intermediate housing is sold at 80% of open market value with a restriction on title in favour of the Council. This enables the housing to remain affordable in the longer term, or the potential for households to staircase into full ownership and the local authority to receive a capital contribution towards future affordable housing development.

Starter Homes: The additional eligibility criteria set out in the White Paper for Starter Homes is welcomed to ensure homes go to those that are otherwise priced out of the market. We would welcome a widening of the definition to include other products that support home ownership, such as the Rentplus model. This differs from the more traditional Rent to Buy schemes under Intermediate housing where tenants are given the option to purchase shares in the rented property. Rentplus is funded through private investors and offers affordable rented homes of tenancies between 5 and 20 years. At the end of the term, a gifted deposit is offered to the tenant to purchase the open market value of the property. This product would therefore seem to fit within the Starter homes objective.

B) Introduce an income cap for starter homes?

South Cambridgeshire District Council supports the inclusion of an income cap for those accessing Starter Homes which is consistent with the income caps for other forms of Intermediate housing such as shared ownership. This will ensure that Starter Homes are available to those whose needs are not met by the market. However, the £90,000 cap for Greater London and the open market value price cap of £450,000 for Greater London, may prove difficult for households to obtain a mortgage unless they have a significant deposit.

Early guidance on the implementation of Starter Homes would be welcomed.

C) Incorporate a definition of affordable private rent housing?

In principle, South Cambridgeshire District Council supports the inclusion of affordable private rent housing within the affordable housing definition and welcomes the proposals for family friendly policies. There is generally a lack of private rented accommodation in the District and the inclusion of affordable private rent housing will support the delivery of Build to Rent schemes attracting private investors. Whilst the Council is supportive of this and sees the merits of its inclusion to enable Build to Rent schemes to come forward, it would have concerns if affordable private rent was to substitute the more traditional affordable rented homes managed by registered providers on other sites that were not Build for Rent. It is therefore suggested that the definition of affordable private rent housing should be specific only to Build to Rent schemes, rather than '*particularly suited to*'.

The ability to flex the discounted rent across the scheme at varying levels of at least 20% discount is welcomed, having due regard to the overall viability of a Build to Rent Scheme. The '*Planning and Affordable Housing for Build to Rent*' consultation paper proposes a minimum provision of 20% of homes within a Build to Rent Scheme to be affordable private rent. Whilst a minimum level is helpful, we would not want to see this as a standard approach for 20%. Within the Council's existing policies we seek 40% affordable housing contribution and would want the flexibility to seek this within a Build to Rent scheme. However, having a minimum level will support the ability for the Council to flex the rents within a scheme so that rents can be targeted at local needs. This may mean having a larger discount but less than 40% affordable contribution to ensure the scheme is viable. This flexibility should be for local authorities to agree.

The Local Housing Company, Ermine Street Housing, set up by the Council would be well placed to take forward a Build to Rent Scheme with the provision of affordable private rent.

This would help boost supply, accelerate delivery and ensure homes are properly managed. However, further clarity is sought on the statement within para 3.28 of the White Paper which states that tenants that local authorities place in new affordable properties should be offered equivalent terms to those in council housing, including the right to buy their home. If this is applied to companies such as Ermine Street Housing where its business case relies on the income stream to repay investors, the inclusion of potential right to buys would make it an unviable proposition for Ermine Street Housing. Where HRA (Housing Revenue Account) funding supports the provision of affordable housing, it is reasonable that tenants should enjoy equivalent terms to those in council housing, but there appears to be little rationale where Local Housing Companies competing in the private market, such as Ermine Street Housing which does not receive funding through the HRA, are disadvantaged in this way.

D) Allow for a transitional period that aligns with other proposals in the White Paper (April 2018)

The proposed change in definition leaves local authorities in limbo as to developers wishing to deliver the new forms of affordable housing, such as Starter Homes. In some cases, it may stall sites coming forward until the new definition is implemented. It would be useful to receive some guidance on whether due consideration should be given now to the new affordable housing definition where schemes are likely to be completed after April 2018.

Q.32 – Do you agree that:

A) National planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products?

Joint

The Councils have some concerns about this approach as we consider that the percentage of homes on individual sites provided as affordable home ownership should be based on local circumstances, local assessment of need, nature and location of the site, etc.

B) That this policy should only apply to developments of over 10 units or 0.5 ha?

Joint

The Councils do not support the 10 unit threshold, as we consider that the requirement should be driven by demonstrable housing need, affordability of market housing and site development viability. The Councils would also take the opportunity to highlight that we consider that the local circumstances in Greater Cambridge are sufficient to justify affordable housing thresholds in their emerging Local Plans lower than that included in the Written Ministerial Statement and now comprising national planning policy. Both Councils have a large current affordable housing need and viability work has shown that both policies are viable, not a barrier to development and do not represent a disproportionate burden.

Q.33 – Should any particular types of residential development be excluded from this policy?

No minimum percentage of homes provided for affordable home ownership should be imposed on individual sites as any approach should be based on local needs and circumstances. If the policy is introduced, then there should be some exclusions, e.g. supported housing with special design features for vulnerable people, including hostel accommodation, extra care, care homes, homes delivered by housing trusts/charities etc. The Councils also consider it appropriate to exclude rural exception sites from any requirement to deliver Starter Homes, which by definition are not affordable in the longer term.

In respect of self build, where a collective group has purchased a plot of land to enable individuals of the group to build their own homes, which would trigger an affordable housing contribution, clarification on the contribution that should be sought would be welcome. The Council wishes to be as flexible as possible to facilitate the self build but also recognises the need to provide affordable housing. Consideration is currently being given to a clawback mechanism written into a S.106 Agreement to provide a commuted sum if the property is sold on within 5 years.

Q.34 – Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions to sustainable development, together with the core planning principles and policies at paragraph 18-219 of the National Planning Policy Framework, together constitute the Government’s view of what sustainable development means for the planning system in England?
Joint The Councils consider that the NPPF is sufficiently clear in respect of sustainable development.
Q.35 – Do you agree with the proposals to amend national policy to:
A) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures?
Joint The Councils would be supportive of the addition of reference to rising temperatures to the list of climate factors to be considered. A hierarchical approach should be taken to tackle overheating, with architectural responses, passive cooling and the role of site wide masterplanning being prioritised over mechanical and active cooling. The planning system is best placed to give consideration to the role of orientation, overhangs and shading, fenestration, green roofs in reducing the risk of overheating, as well as wider approaches such as the role of green infrastructure and sustainable drainage systems in providing evaporative cooling.
B) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?
Joint The Councils would be supportive of greater clarity in relation to the role of planning policy in supporting the future resilience of communities and infrastructure to climate change. There are many ways in which the planning system can support climate resilience, from the role of green infrastructure and sustainable drainage systems in reducing flood risk and helping to reduce the urban heat island effect through evaporative cooling, to the role of architectural responses to issues such as overheating. These measures also have the additional benefit of enhancing the visual and amenity value of new developments.
Q.36 – Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?
Joint The Councils would be supportive of measures to help clarify the national policy approach to flood risk.
Q.37 – Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?
Joint The Councils would be supportive of such an amendment. Policies in our emerging Local Plans already seek to ensure that developments give consideration to existing sources of noise and to mitigate any impact where necessary.
Q.38 – Do you agree that in incorporating the Written Ministerial Statement on wind energy development in paragraph 98 of the National Planning Policy Framework, no transition period should be included?
Joint No comment.

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Report To: Cabinet

20 April 2017

Lead Officers: Joint Director of Planning and Economic Development
Director of Housing

Consultation Response on the Government's paper Planning and Affordable Housing for Build to Rent

Purpose

1. To agree a response to the Government's consultation on its paper relating to Planning and Affordable Housing for Build to Rent.
2. This not a key decision because it relates to a Government consultation and it was first published in the March 2017 Forward Plan.

Recommendations

It is recommended that Cabinet agree:

- the consultation response set out in Appendix A;

Reasons for Recommendations

3. The introduction of Affordable Private Rent as a new model for affordable housing is being proposed as part of the Government's white paper. The intention is that this will become part of the Affordable Housing definition through the National Planning Policy Framework. The white paper also sets out the Government's intention to encourage institutional investors into housing through the private rented sector, known as Build to Rent, with Affordable Private Rent being the affordable element of such schemes.
4. The response to these proposals is set out within the consultation response on the Housing White Paper which is also being considered at Cabinet on 20th April 2017. The response attached at Appendix A relating to the Planning and Affordable Housing for Build to Rent is therefore considered a subset of the white paper which goes into the detail of Build to Rent and the Affordable Private Rent.

Executive Summary

5. This report summarises the main content of the Planning and Affordable Housing for Build to Rent and proposes a response to the 26 questions included in the consultation.

Background

6. On 7 February 2017, the Government published the consultation paper on Planning and Affordable Housing for Build to Rent. This was published alongside the housing white paper *Fixing our broken housing market*. The consultation paper seeks views on planning measures intended to support Build to Rent through the planning system and make the benefits of Build to Rent more widespread.

7. The consultation seeks views on several measures which should help to improve the financial viability and the predictability of planning outcomes for the sector. The main proposed measures are:
- Placing further emphasis on Build to Rent through planning policy;
 - Encouraging an alternative approach to affordable housing for Build to Rent called Affordable Private Rent (sometimes referred to as Discounted Market Rent);
 - Strengthening the expectation on Build to Rent schemes to offer a Family Friendly Tenancy of three years or more, to those tenants who want one.
8. In summary, a Build to Rent Scheme is
- 100% rented, possibly as part of a mixed tenure development
 - 3+ year length family friendly tenancies
 - Professionally managed in single ownership
 - Affordable Private Rent as the only form of affordable housing on the scheme
 - Attractive to private investors, looking for long term investment
 - Promoting accelerated delivery, potential for modular constructed schemes
9. The proposals for Affordable Private Rent include:
- No registered provider role – all under one single management
 - Rents at least 20 per cent below market value
 - Proposals for a minimum of 20% Affordable Private Rent Provision
 - Potential to flex rents to increase the discount – subject to overall viability
 - Minimum covenant period of 15 years+
 - Clawback – commuted sum provision, linked to average percent discount level

Options

10. With reference to the proposed consultation response Cabinet could:
- (i) Approve it;
 - (ii) Reject it;
 - (iii) Amend parts of it;

Implications

11. In the writing of this report, taking into account financial, legal, staffing, risk management, equality and diversity, climate change, community safety and any other key issues, the following implications have been considered: -

Financial

12. There are no direct financial implications arising from this report.

Legal

13. There are no direct legal implications arising from this report.

Staffing

14. There are no direct staffing implications arising from this report.

Risk Management

15. There are no direct risk management implications arising from this report.

Equality and Diversity

16. There are no direct equality and diversity implications arising from this report.

Climate Change

17. There are no direct climate change implications arising from this report.

Consultation responses (including from the Youth Council)

18. This report has been prepared jointly by South Cambridgeshire Planning and Housing Officers.

Effect on Strategic Objectives

Objective1 – Living Well

19. Access to good housing is important to good health. The Local Plan seeks to meet housing needs whilst protecting the natural and built environment.

Objective 2 – Homes for our Future

20. The Planning and Affordable Housing for Built to Rent is intended to help secure the delivery of a wide range of housing to meet the needs of existing and future communities across England.

Objective 3 – Connected Communities

21. There are no direct implications for this strategic objective.

Objective 4 – An innovative and dynamic organisation

22. The Planning and Affordable Housing for Build to Rent offers the Council opportunities for working jointly with investment partners and expanding the private rented sector through its Housing Company, Ermine Street Housing. This will require innovation and dynamism in order to support the delivery of the private rented sector.

Appendices

Appendix A: Proposed Consultation Response to the Planning and Affordable Housing for Built to Rent

Appendix B: Consultation Paper – Planning and Affordable Housing for Build to Rent

Background Papers

The following background papers were used in the preparation of this report:

Report Authors: Julie Fletcher – Head of Housing Strategy
Telephone: (01954) 713352
Caroline Hunt – Planning Policy manager
Telephone: (01954) 713196



**South
Cambridgeshire**
District Council

Insert Appendix here

Department for Communities & Local Government Consultation

Planning and Affordable Housing for Build to Rent South Cambridgeshire District Council's Response

The Council's response to the proposals for the planning and affordable housing for build to rent is set out below:

Q1. Please provide your name and address and contact details in the box provided, and identify whether you are responding as (please tick one):

☐

A private individual?

☒

On behalf of an Organisation?

Julie Fletcher - Head of Housing Strategy
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

Q2. If you are responding as a private individual, please identify in what capacity you are replying:

N/A.

Q3. If you are responding on behalf of an organisation, please identify in what capacity you are replying:

Local Authority and Social Landlord

Q4. Please specify the part(s) of England in which you live, or your organisation's activities (or members) are principally located:

East of England

Q5 – Do you consider there are market and regulatory failures impeding the rapid development of the Build to Rent market that merit national policy intervention? Please add comments.

Market Failures – market prefers build for sale and developments, as there is still limited investor interest in Build to Rent schemes. Limited scale of financial incentives, for example market housing benefits from Help to Buy equity loans, which encourage developers to build homes for sale.
Regulatory failures – lack of regulations differentiating Build to Rent from other forms of development.

Q6 – Do you agree with the proposal to refer explicitly to Build to Rent in the National Planning Policy Framework?

Appendix A

Yes – this would ensure regulations exist to deliver Build to Rent through the local plan where there is an identified need to do so. Build to Rent will cater for a range of housing needs that supports economic growth, providing easy access to accommodation, stability and good quality accessible housing.

Build to Rent schemes need to be defined in such a way as to clearly differentiate them from other forms of development. The Council supports the proposals that they should be 100% rented, possibly as part of a mixed tenure development but have to be on the same site or contiguous, offering 3+year length 'Family Friendly' tenancies and that they will be professionally managed in single ownership.

Q7 – Do you think that Government should set a policy expectation on Affordable Private Rent in the National Planning Policy Framework or not (please state reasons)

Yes. Affordable Private Rent should be described as a form of affordable housing that is delivered exclusively through a Build to Rent scheme. We would not want to see Affordable Private Rent substituting the more traditional affordable housing managed by registered providers on other sites that are not specific to Build to Rent.

There needs to be robust mechanisms to ensure Affordable Private Rent is allocated to households whose needs are not met by the market based on local incomes. The Affordable Private Rent should remain affordable in the longer term and offer rents between social rent and below market rent and be available to those on housing benefit. In particular it would be useful if a proportion of the Affordable Private Rent was available to support the local authority's ability to discharge its homelessness duty in the private sector, which is becoming increasingly more difficult with individual landlords reluctant to take on households on benefit.

The consultation paper states that schemes will typically be professionally managed stock in single ownership and management control. It is therefore presumed that there will be no registered provider role in the Affordable Private Rent; this should be clearly stated in its definition. There is some concern that there will be no safeguards in place as to the management of Affordable Private Rent if there is no regulation as there currently is through the more traditional forms of affordable housing.

Q8 – Will a policy expectation in the National Planning Policy Framework send a sufficiently strong signal to support Affordable Private Rent as the main vehicle for affordable housing in Build to Rent.

Yes as long as the definition of Affordable Private Rent is restricted to Build to Rent schemes only and that it is the only form of affordable housing that is to be delivered on Build to Rent schemes.

Q9 – Do you consider that Affordable Private Rent could play a useful role in the delivery of affordable housing in the areas where you operate?

Yes. The Council acknowledges the difficulties in providing the traditional forms of affordable rent/shared ownership in a private rented scheme and welcomes the potential to increase the overall supply of private rented accommodation in the District through the Build to Rent initiative.

Appendix A

Q10 – Do you consider that the efficiencies arising through on-site provision of Affordable Private Rent can materially improve the viability of Build to Rent, compared to other affordable housing tenures?

Yes, although there would need to be significant incentives to encourage investment in the different approach to procurement and management needed to allow Build to Rent development to become mainstream. Current guidance on viability appraisals is geared towards residual valuations, which suit open market sale led schemes. Alternative appraisal models are needed that are accepted by investors and developers alike that encourage Build to Rent to be seen as an equally viable form of development. It should also be appreciated that the procurement of Build to Rent schemes is quite different from Market Sale developments, which are often Housebuilder led and often favour slower (traditional) construction methods and longer marketing periods. Build to Rent schemes could be procured by investor / owner / managers who may prefer the higher quality and quicker build opportunities that Off Site Manufacturing (OSM) can deliver. The ability for the schemes to be occupied quickly after completion and en mass is another key differentiator of Build to Rent from Market Sale

Q11 – Do you consider that there could be unintended consequences of Affordable Private Rent if it is accepted as a form of affordable housing?

Yes – if Affordable Private Rent is not restricted exclusively to Build to Rent, then there is a risk that developers could, for example, attempt to reduce the requirement for other forms of affordable housing, especially Affordable Rent and Social Rent on schemes that are market sale led. The management of Affordable Private Rent that is not part of a larger Build to Rent scheme would be a cause for concern that these would not be managed appropriately. Affordable Private Rent should be restricted to the Build to Rent Sector with the restrictions set out in our responses to Q6 – Q9 above.

Q12 – If your answer to Q11 is yes, would these consequences be mitigated by limiting Affordable Private Rent to Build to Rent Schemes?

Yes.

Q13 – Do you think it is reasonable for Planning Authorities to specify minimum tenancy lengths in Build to Rent schemes? Please add your reasons, and give examples of such agreements where appropriate.

Yes, along with the ability for the tenant to choose the tenancy length that suits them (from 6 months onwards and with rent increases at the end of the initial term (up to 3 years) restricted to RPI, so as to prevent the landlord evicting a sitting tenant in order to increase the rent above RPI. The tenant should also have the right to renew their tenancy, in much the same way that commercial tenants have the same rights under the 1954 Landlord and Tenant Act, and the Landlord should not be allowed to offer tenancies that could not be renewed in this way. This would allow families (for example) to have greater confidence that they could remain living in the same home for longer than 3 years. There may need to be amendments to the Housing Act to regulate these tenancies and differentiate them from the existing form of assured shorthold tenancy, that does not give tenants these rights.

Q14 – Do you agree the Build to Rent tenancies should be for a at least three years (with a one month break option for the tenant after the first six months), for all customers in the development that want one?

Appendix A

Yes. If this was applied to all customers it would then equally apply to those tenants paying full market rents, and not just those on Affordable Private Rent.

Q15 – Does the definition of Build to Rent set out on page 20 capture all of the appropriate elements? (If not, please state why, and what criteria should apply).

Yes, and in addition within this District a minimum covenant period of at least 15 years would be appropriate along with a clawback mechanism to give investors and operators the confidence to invest in such schemes.

Q16 – Do you agree that the National Planning Policy Framework should put beyond doubt that Affordable Private Rent qualifies as affordable housing in Build to Rent schemes? (If not, please state why.)

Yes but Affordable Private Rent should be restricted solely to Build to Rent schemes and no other form of development.

Q17 – Do you agree to the definition of Affordable Private Rent set out on page 21? (if not, please state why, and what criteria should apply)

The definition should make it clear that this form of tenure is restricted solely to Build to Rent. The definition should be explicit that rent levels should be at least 20% below market rents and that there is flexibility for local authorities to determine a range of rent levels for the Affordable Private Rent so as to provide a choice of rents that are genuinely affordable. This will be considered in the context of the overall viability of the Build to Rent Scheme. The average overall discount percentage figure would then be used to determine the value of any future clawback.

The definition should also include that a minimum of 20% of the properties within a Build to Rent development should be Affordable Private Rent but that local authorities can seek a higher contribution where it is viable.

Q18 – The Government intends to set the parameters of Affordable Private Rent as:

- ***A minimum of 20 per cent of the homes to be discounted;***
- ***The discount to be set at minimum of 20 per cent relative to the local market;***
- ***An offer of longer tenancy of three years or more;***
- ***The discount to apply indefinitely (subject to a “claw back” arrangement if Affordable Private Rent homes are withdrawn).***

Taken as a whole, are these parameters: (i) reasonable; (ii) too onerous; (iii) insufficient? Which, if any of them, would you change and why?

It is considered that these parameters are reasonable. However we would wish to add that the tenants have the right to renew their tenancy after the initial letting period, should they wish to do so. We would also like to see protection for tenants who may need to claim housing benefit, in that there are no tenancy conditions or overly onerous service charges that prevent them from doing so.

Appendix A

Q19 – Should the parameters for Affordable Private Rent appear on the face of the National Planning Policy Framework or within Planning Practice Guidance.

The change in definition for affordable housing which includes the Affordable Private Rent Housing should be set out within the National Planning Policy Framework. Further guidance on its implementation would sit better within Planning Practice Guidance to give local authorities some flexibility.

Q20 – The Government is minded to leave determination of eligibility and nomination criteria for Affordable Private Rent to the negotiation between the developer and the local authority. Do you support this position? Will it affect take-up of the policy? Please give your reasons.

Guidance is needed to assess the viability of Build to Rent schemes, which differ fundamentally from market sale led developments. Without such guidance, there is likely to be constant uncertainty as to what is an appropriate affordable housing provision in Build to Rent developments, leading to best practice being determined through lengthy and costly planning appeals. This will not help accelerate delivery. What is needed is some guidance and benchmarking from DCLG and the industry to help describe how viability assessments in Build to Rent schemes should be conducted and how to balance the affordable housing requirements within them against other planning obligations that may arise.

The Council would want to see localised policy through its Affordable Housing SPD as to the eligibility and nomination criteria for Affordable Private Rent. This should be a localised policy and not left as a negotiation tool between the developer and the local authority.

Q21 – The Government considers there is no need for a fixed minimum covenant period, so long as appropriate claw-back arrangements are provided for. Do you agree?

No. South Cambridgeshire District Council would like to see a minimum covenant period for at least 15 years so that from the tenants' perspective, they will have some confidence that their home will remain more affordable than market housing for that period. There is also some concern that without a minimum period this may provide some ambiguity for developers to avoid onsite affordable housing provision which is always the Council's preference in such a high demand area. If the developer is unable or unwilling to agree to the minimum covenant then the scheme should not be described as Build to Rent.

Q22 – Do you think Government should (a) prescribe the basis for calculating the amount of claw-back, (b) set a possible basis for calculating the amount of claw-back to be agreed between the local authority and the applicant?

Yes, as this will ensure transparency and certainty.

Q23 – Should the Government's Build to Rent and Affordable Private Rent policy be identical across the whole of England or does it need to be set differently between London and the rest of England? If it should be set differently, please use the comments box to tell us how and why the policy should vary in London from the rest of England

In London the build to Rent market is more advanced than in other parts of the country, so possibly different policies are appropriate. London is also made up of a number of different boroughs, all with different affordability

Appendix A

criteria. In terms of the covenant length, the Growth Areas in this District would have a similar level of attractiveness to investors as the London PRS, as housing costs in this region are second only to London, with generally high values for housing land also.

Q24 – Would it be helpful for Government to produce model clauses (which would not be mandatory) that could be used in S106 agreements to give effect to Affordable Private Rent?

Yes.

Q25 – Is a transitional period of six months appropriate for the introduction of policies proposed in this consultation? (If not, why not?)

Within the White Paper, a transitional period for changes to the affordable housing definition suggest up to April 2018, which is not consistent with the above proposal of six months. Either way they need to be aligned, implementation of the Affordable Private Rent cannot be enforced until the change of definition through the NPPF.

It would be useful to receive some guidance on whether due consideration should be given now to the new affordable housing definition, that includes Affordable Private Rent, where schemes are likely to be completed after the six month period/April 2018.

Q26 – Does the summary Equalities Statement in Annex A represent a fair assessment of the equalities impacts of the policy proposals in this consultation? Please provide any further evidence on this issue, including how any negative impacts might be minimised and positive impacts enhanced.

Positive	Negative
Minimum tenancies up to 3 years	No right to renew tenancy after 3 years
Could improve tenure security for those living in private rented sector	Could result in fewer affordable rented (and intermediate) homes being delivered
Could reduce demand on Council housing waiting list through increased delivery of affordable homes in the District	Lack of minimum covenant period means a tenant's home may not remain affordable in the longer term
Could reduce demand on Council Housing by making Buy to Let less attractive to investors, who often evict tenants just to increase the rent, who then become unintentionally homeless and the responsibility of the Council to rehouse	Lack of agreed guidance on viability makes it difficult to promote Build to Rent as opposed to Market Sale housing developments
	Risk that Councils may not be able to invest / own / operate Build to Rent scheme despite already being actively involved in PRS (Ermine Street) If DCLG decides all tenants in property developments owned by the Council have the Right to Buy
	No regulation for Affordable Private Rent in terms of management.
Could provide additional private rented accommodation to secure suitable housing to discharge the local authority's	Lack of legislation to enable the local authority to nominate tenants. Concern that this could have a negative effect for

Appendix A

prevention and homelessness duties.	people with protected characteristics, such as the elderly or disabled, or may be reliant on benefits, who could be discriminated against if the private landlord will not accept those on benefits.
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Agenda Item 8

REPORT TO: Cabinet

20 April 2017

LEAD OFFICER: Joint Director for Planning and Economic Development

A428 Black Cat to Caxton Gibbet Route Options Consultation

Purpose

1. The purpose of the report is to agree the Council's response to Highways England's consultation on route options for the A428 Black Cat to Caxton Gibbet improvement scheme.
2. This is not a key decision because it is responding to a consultation. It was first published in the February 2017 Forward Plan.

Recommendations

3. It is recommended that Cabinet agrees:
 - a) the response to the A428 Black Cat to Caxton Gibbet Improvement Scheme set out in paragraph 28;
 - b) delegated authority be given to the Joint Director of Planning and Economic Development to make further technical comments in consultation with the Strategic Planning Portfolio Holder.

Reasons for Recommendations

4. Improvements to the A428 are important for the delivery of the growth agenda, the economy, and to improve journey times and road safety for the travelling public. The road has an impact on the environment and economy of the district, therefore it is recommended that the Council responds to the consultation addressing potential route options.

Executive Summary

5. The proposed upgrading of the A428 Black Cat to Caxton Gibbet is the final section of upgrading the route to dual carriageway standard between the M1 and M11. In the longer term it will form part of the wider Oxford to Cambridge Expressway.
6. The current Highways England public consultation is the first key stage in developing the A428 improvement scheme; it includes three route options, and three junction options for the Black Cat roundabout at the A1. The consultation does not include junction design for the Caxton Gibbet roundabout.
7. Feedback to this consultation will inform more detailed technical work by Highways England leading to a Preferred Route announcement, anticipated in Summer 2018. As a Nationally Significant Infrastructure Project a Development Consent Order process will be undertaken and consent ultimately granted by Central Government. Delivery of the scheme would be likely to take place as part of the Road Investment Strategy Period 2 (from April 2020).

Background

8. The Case for the Oxford to Cambridge Expressway was prepared by a coalition of local authorities between Oxford and Cambridge in 2015 to lobby for infrastructure improvements between the cities; the report set out the high level context of the strategic and economic need for the construction of the Oxford to Cambridge Expressway, with an immediate focus on delivering the A428 Black Cat to Caxton Gibbet upgrade.
9. In the November 2016 Autumn Statement the Government welcomed the National Infrastructure Commission's interim report into the Cambridge-Milton Keynes-Oxford growth corridor and accepted the recommendation for an Oxford-Cambridge Expressway, and committed £27 million in development funding.
10. Government is also committed to improving other infrastructure in the region; the A1 East of England Strategic Study (looking at improving the A1 between the M25 and Peterborough) and East-West Rail (with funding committed in the Autumn Statement 2016 to the Bedford to Cambridge section).
11. Over £2 billion is committed in the current Road Investment Strategy (RIS) to create better and safer journeys and support growth across the East of England. This includes the A14 Cambridge to Huntingdon Improvement Scheme, now under construction, and an upgrade to the A428 between the A1 Black Cat roundabout and A1198 Caxton Gibbet roundabout, as the first phase of the Oxford to Cambridge Expressway. The RIS announcement: *"improvement of the A428 near St Neots, linking the A421 to Milton Keynes with the existing dual carriageway section of the A428 to Cambridge, creating an Expressway standard link between the two cities via Bedford. The scheme is expected to include significant improvements to the Black Cat roundabout, where the A1 currently meets the A421."*
12. Highways England's Route Options consultation is the first key stage in developing the A428 improvement scheme. Following the feedback from all parties to this consultation Highways England will undertake technical analysis which will determine which is the most suitable option to take forward, together with a proposal for the Black Cat roundabout. This will then result in an announcement of a 'Preferred Route' for the scheme (anticipated in Summer 2018). A Development Consent Order (DCO) submission will be made to the Planning Inspectorate and, subject to DCO consent for the scheme and funding being approved by Central Government, it is anticipated that delivery would likely take place as part of RIS2 from April 2020.
13. There is limited technical information available at this stage for the route options consultation. Highways England has prepared a short consultation brochure; this outlines the three route options as indicative lines on a map and three options for the improved Black Cat junction, together with a brief comparison of the options. The brochure and a questionnaire response form is available to view on Highways England's A428 Black Cat to Caxton Gibbet webpage:
<http://roads.highways.gov.uk/projects/a428-black-cat-to-caxton-gibbet/>

Options for consultation

14. Highways England has identified six key benefits and objectives in developing the scheme, as follows:
 - Enabling economic growth
 - A safe and serviceable network

- A more free-flowing network
 - An improved environment
 - A more accessible and integrated network
 - Customer satisfaction
15. Highways England has sifted a long list of over 40 potential options, including improvements to public transport and junctions, widening the existing A428, and building new road infrastructure away from the current A428, to see which performed best against these objectives.
16. Highways England is currently consulting on three route options to provide a new dual 2-lane carriageway between the Black Cat roundabout at the A1 and Caxton Gibbet at the A1198. All options propose grade-separated junctions at both ends and would downgrade the existing road for local access. The three routes are shown at Appendix 1. (It is important to note that at present they are indicative lines on a plan in order to give an indication of approximate alignments):
- **Orange Route** – Located to the north of the existing A428 from the Caxton Gibbet towards a new junction with Cambridge Road, St Neots, where the route switches to the south of the existing A428 towards the Black Cat junction with the A1.
 - **Purple Route** – From the Caxton Gibbet the alignment is situated to the south of Eltisley and Croxton, but north of Abbotsley (in Huntingdonshire district) to Black Cat.*
 - **Pink Route** – Initially follows the same alignment as the Purple route from the Caxton Gibbet to the south of Eltisley and Croxton, but then continues south of Abbotsley to Black Cat.*
- (* Neither the Purple or Pink Routes provide direct access to St Neots from the new A428; access would be via the downgraded existing road.)
17. In addition, Highway England is consulting on three options for the improvement of the Black Cat roundabout as follows (The three junction options are shown at Appendix 1):
- **Option A** – Free flowing access from the A421 to the upgraded A428 and onto the A1 northbound. Free flowing movements along the A1. Two new roundabouts to the west of the current roundabout would facilitate all the local road traffic movements. To achieve this layout the junction would be at 3 height levels.
 - **Option B** – Free flowing access from the A421 onto the upgraded A428 and onto the A1 northbound as with Option A. However the A1 would not be free flowing, and would need to continue to negotiate the existing Black Cat roundabout. Also, not all directions can be achieved via this arrangement. This junction would be two height levels.
 - **Option C** – Similar to Option A with free flowing access from the A421 to the upgraded A428 and onto the A1 northbound, and free flowing movements along the A1. The difference between Options A and C relate to the local road movements, which are accommodated by a single enlarged roundabout compared to two roundabouts. This layout would also be at 3 height levels.
18. Highways England has not, at this stage, provided any options for the design of the junction layout at the Caxton Gibbet roundabout. It is a much simpler junction to

address than the Black Cat roundabout and Highways England anticipates it could be a grade separated arrangement similar to the Cambourne junction.

Implications for South Cambridgeshire

19. Only the eastern extent of the road improvement scheme lies within South Cambridgeshire; between the Caxton Gibbet roundabout westwards to the district boundary to the west of Croxton village.
20. In relation to the improvement scheme that lies within South Cambridgeshire the consultation material shows all route options would:
 - have a visual impact at the Caxton Gibbet, where a new grade separated junction arrangement will be needed to enable free-flowing traffic along the A428,
 - remove traffic from the existing road, help to shift traffic away from local roads by encouraging drivers to use the dual carriageway, but may lead to more traffic on the A1198 to access the route at the Caxton Gibbet (Note: this should be viewed within the context of the A14 improvement scheme being completed by the time works begin on the A428, which should draw back traffic from surrounding routes including the A1198),
 - improve air quality along the current A428, and
 - provide opportunities for improving access for pedestrians, cyclists and equestrians along the existing A428 which will be retained as a local road.
21. From the limited information provided in the consultation material the route options would have the following impacts on South Cambridgeshire:
 - **Landscape** – The Purple and Pink Routes cut through an attractive, tranquil undulating and more detailed landscape, which is some of the best landscape in the district. Both routes will be closer to and impact on several villages, and will require more infrastructure in the form of six additional road crossings within the rural area.

In contrast, the majority of the Orange Route lies within an established transport corridor and would have a lesser impact on a more regular and intensive agricultural landscape. The route crosses four local roads, three of which are close to the existing A428. The Purple and Pink Routes would have a significantly greater impact on landscape than the Orange Route.
 - **Ecology** – There are sites designated for ecological protection to the south of the existing A428; including Eltisley Wood, Croxton Park and Caxton Moats County Wildlife Sites. Both the Purple and Pink Routes pass close to Gransden Wood SSSI, whilst the Pink Route also passes close to Weaverly Wood SSSI and through several woodlands including St John's Wood and Thistle Hill Plantation. Therefore the Purple and Pink Routes would likely have a greater impact on ecology than the Orange Route.
 - **Heritage assets** – More heritage assets would be impacted by the Purple and Pink Routes to the south; which would bring the route closer to the Scheduled Ancient Monument and the Listed Dovecote at Pastures Farm (surrounding it with A roads on three sides) and four moated sites, including a Schedule Ancient Monument at Caxton Moats. It is likely that these routes would also cut across a historic route linking Eltisley and Caxton

Conservation Areas. Just outside South Cambridgeshire the routes also pass close to further listed buildings. The Purple and Pink Routes would cause harm to South Cambridgeshire's historic environment.

On the other hand the Orange Route would take traffic away from Eltisley Conservation Area within which are numerous listed buildings including a mile stone and mile post adjacent to the existing A428. It would also take traffic away from Croxton Conservation Area and listed buildings, Scheduled Ancient Monument and Registered Park and Garden. The Orange Route would have a neutral or positive impact on South Cambridgeshire's historic environment.

- **Air quality and noise impacts** – The prevailing wind direction is from the south west, which would suggest properties in Eltisley and Croxton could potentially be more directly affected by the (Purple and Pink) routes which align to the south. Both villages should benefit from the Orange Route which would take traffic further north than the existing road; and with careful selection of the final route alignment within the corridor, it may be possible that adverse impacts could be mitigated.
22. In addition, the Orange Route will provide a high speed connection directly to St Neots which neither of the other two routes offer, although it will still be possible to reach St Neots on the existing A428 which will be retained for local access. It would also provide greater resilience in the A428 corridor to cope with unexpected incidents and events on either the upgraded A428 or the downgraded local road.
 23. Highways England has yet to provide details for the design of the Caxton Gibbet roundabout. However, the Council will want to ensure any future design for this junction minimises impacts on the existing businesses near the junction and future residential-led development at Cambourne West.
 24. A new cycleway is also being explored between Papworth Everard and the Caxton Gibbet roundabout. It is important that the scheme does not prejudice the delivery of new non-motorised user infrastructure in the vicinity of the A428 corridor and it should seek to reduce severance caused by the current road, by facilitating appropriate access across it.
 25. It is also important to take into consideration City Deal proposals for the A428 corridor, to ensure these would not be prejudiced by the A428 improvement scheme, and should aim to achieve synergies. The first phase of City Deal will consider the A428 from Cambridge as far as the Caxton Gibbet roundabout, but future phases will address the wider corridor to St Neots.

Proposed Response to the Route Options Consultation

26. There will inevitably be some environmental and social impact from a major new road scheme. However, as outlined above (paragraphs 21-22), the Orange Route would appear to provide the best alignment for South Cambridgeshire; in terms of minimising harm and safeguarding the quality of life of local residents.
27. Whilst the Black Cat junction is not within South Cambridgeshire it is nevertheless an important junction on strategic routes serving the region. To be effective the junction layout must facilitate free flowing movements on all strategic routes. In this context, Option B would appear a weaker option than A and C, as traffic using the A1 would still have to negotiate the Black Cat roundabout and it prevents north bound A1 traffic

from joining the new A428 towards Caxton Gibbet, forcing traffic to remain the existing road thus reducing the potential benefits to South Cambridgeshire residents living adjacent to it.



28. Cabinet is recommended to agree the following response to Highways England:
1. Support the principle of upgrading the A428 between the Black Cat and Caxton Gibbet which will support the delivery of the national, regional and local growth agenda.
 2. On the basis of the evidence provided up to this point in the process, the Council support the Orange Route Option. The Purple and Pink options would have significantly greater environmental disbenefits, and are therefore not supported. This is subject to any final alignment and confirmation that the existing A428 will be retained as a local road providing local access to communities along the route.
 3. Support proposals for the Black Cat roundabout which enable free flowing traffic on all the strategic routes as well as providing all movements on the local road network (Options A and C).
 4. Advise Highways England that the Council is seeking to ensure that future design for the Caxton Gibbet junction minimises impacts on nearby existing and planned developments, including Cambourne West.
 5. Advise Highways England that the scheme should not prejudice the delivery of any future strategic proposals, including the A1 improvement scheme and wider Oxford to Cambridge Expressway proposals.
 6. Advise Highways England that the scheme should not prejudice Greater Cambridge City Deal proposals for the A428 corridor, including bus and cycle improvement measures, and where possible synergies should be sought.
 7. The Council supports the intention to provide opportunities for improving access for pedestrians, cyclists and equestrians and would urge Highways England to secure opportunities for the enhancement of existing and/or provision of new infrastructure to the highest standard. The scheme should also seek to redress severance caused by the existing road through the provision of crossings at appropriate points.
 8. The Council would like to explore Legacy opportunities with Highways England.

Considerations

29. The Council is a statutory consultee for the A428 improvement scheme. It is recommended the Council responds to the current consultation to ensure the interests of its residents and the environmental impacts are appropriately considered by Highways England in developing their Preferred Route.
30. As work on the improvement scheme progresses there will be further opportunities for the Council to respond to and address issues in more detail.

Options

31. Alternative options would be for the Council not to respond to the consultation, but given the importance to the district this is not recommended. The Council could make a different response, or add additional comments.

Implications

32. In the writing of this report, taking into account financial, legal, staffing, risk management, equality and diversity, climate change, community safety and any other key issues, the following implications have been considered:-

Financial

33. This is a nationally funded road scheme.

Legal

34. The District Council is a statutory consultee for the A428 improvement scheme and will have a role in the process relating to the delivery of this scheme; through responding to the Preferred Route consultation and participating in the DCO Examination in Public process.

Staffing

35. The Council will need to continue to be involved in the A428 scheme as it evolves, including through the formal DCO process. At this stage staff time within the Planning Policy, Consultancy Unit, Major Developments, and Environmental Health teams will be met through existing resources, but this will need to be kept under review.

Equality and Diversity

36. The improvement scheme should help to redress severance issues along the A428 corridor and provide opportunities for improving access for pedestrians, cyclists and equestrians along the existing A428 which will be retained as a local road.

Climate Change

37. The new road could be designed to be more resilient to climate change, including potential for increasing capacity of drainage systems, providing surfacing more resistant to extreme weather conditions and improvement in air quality to local communities.

Consultation responses

38. A number of Council services have been consulted in the preparation of this report, including Planning and New Communities, and Environmental Health.

Effect on Strategic Aims

Aim 1 – Living Well

39. Careful realignment of the A428 away from existing communities provides the opportunity to improve the quality of life and safety of local residents and maintain South Cambridgeshire as an attractive place to live.

Aim 2 – Homes for our future

40. Capacity of the A428 is an important issue for the economy of the area and the wider development strategy.

Aim 3 – Connected communities

41. The A428 is a key part of the transport infrastructure of the area, and impacts on quality of life.

Appendices

Appendix 1: A428 Route Options and Options for the Black Cat roundabout

Background Papers

The A428 Black Cat to Caxton Gibbet Route Options consultation documents can be found on the Highways England website:

<https://highwaysengland.citizenspace.com/he/a428-black-cat-to-caxton-gibbet/>

Autumn Statement 2016:

<https://www.gov.uk/government/publications/autumn-statement-2016-documents>

Road Investment Strategy (RIS):

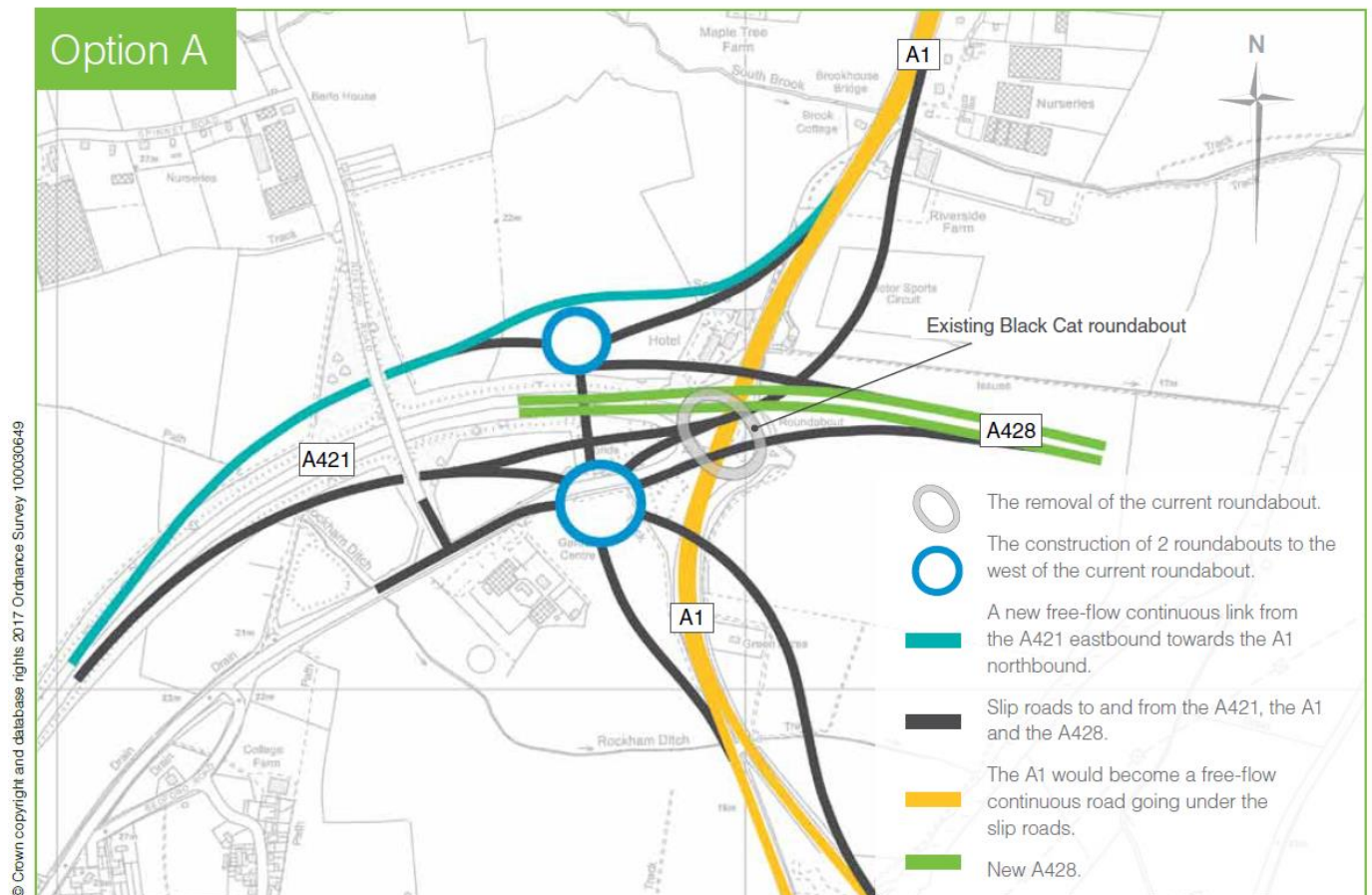
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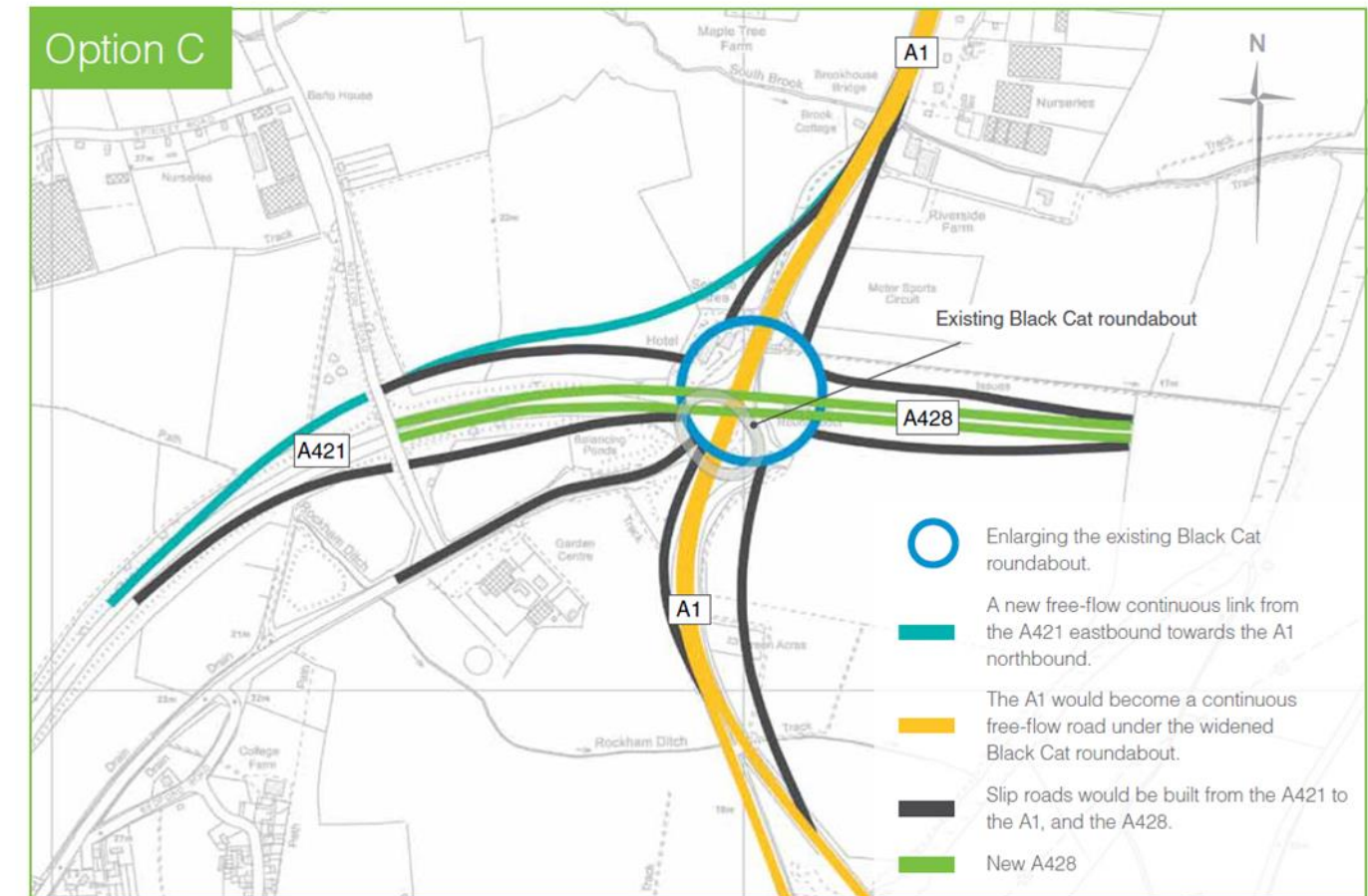
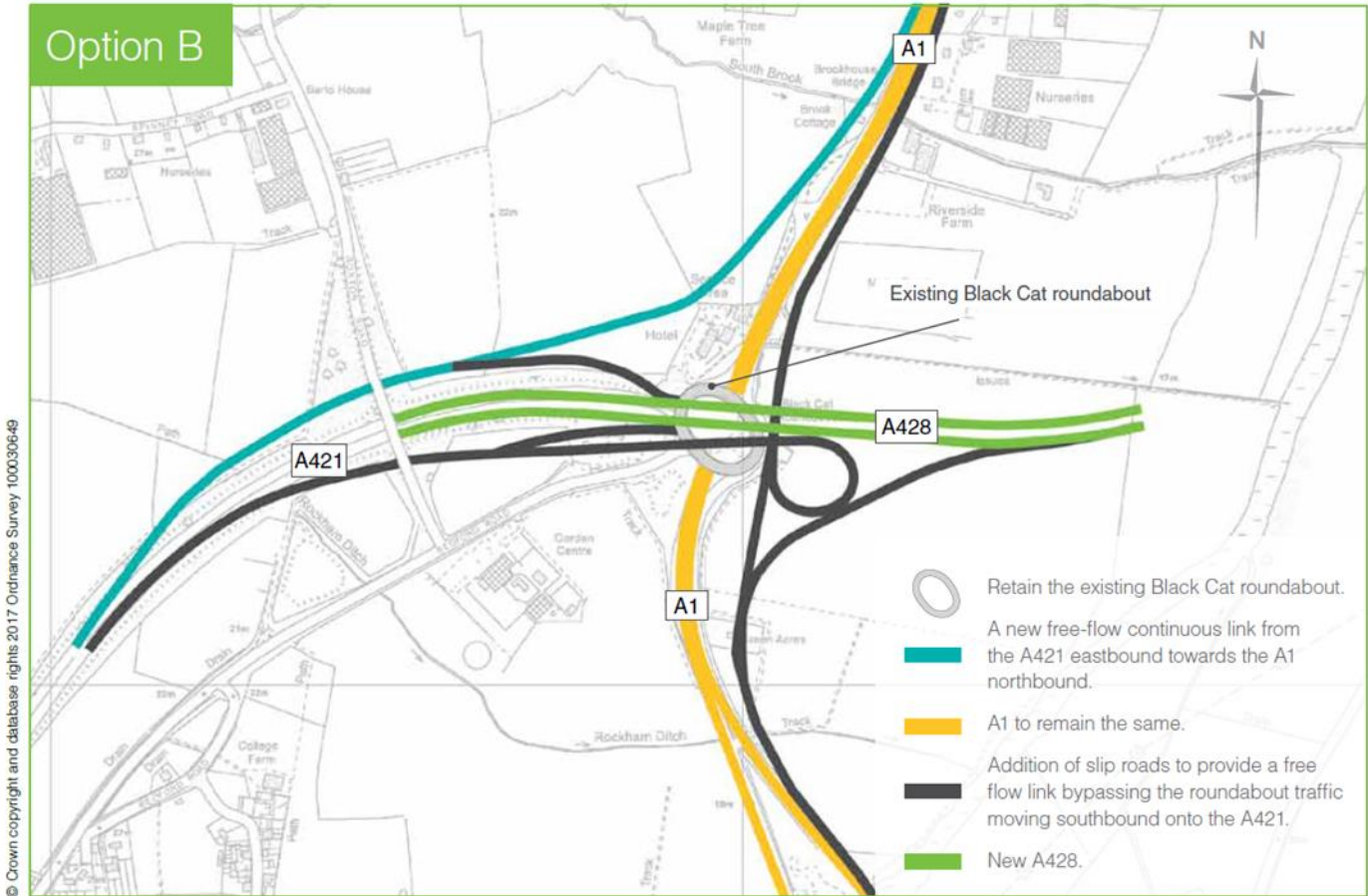
Report Author: Claire Spencer – Senior Planning Policy Officer
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A428 Route Options and Options for the Black Cat roundabout

A428 Route Options

Options for the Black Cat roundabout





Agenda Item 9

REPORT TO: Cabinet

20 April 2017

LEAD OFFICER: Director of Planning and Economic Development

Progress Update on Shared Planning Service

Purpose

1. To update Cabinet on progress in developing a Shared Planning Service between South Cambridgeshire District Council (SCD) and Cambridge City Council (CCC).
2. This is a key decision because
 - (a) it results in the authority incurring expenditure which is, or the making of savings which are, significant having regard to this Council's budget for the service or function to which the decision relates; or
 - (b) it is significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the relevant local authority.

and it was first published in the December 2016 Forward Plan.

Recommendations

3. Cabinet is recommended:
 1. To note progress to date on the implementation of the shared planning service.
 2. To agree the development of the multi-phase programme for delivery of the project (see **Appendix 1**)
 3. To approve the broad principles of the proposed management structure (**Appendix 2**) as the basis for the continued development of the organisational structure.
 4. To agree the allocation of additional resources to support the programme as set out in paragraph 21 – 24.
 5. To agree the early introduction of a “Greater Cambridge Planning Service” designation on signatures of emails from planning staff of both Councils
 6. To note the need for seamless ICT systems across Greater Cambridge and to note the commitment to early work (and costs) on the procurement of a common ICT system for planning.
 7. To note the high level objectives identified by the project team and invite them to consider adding to them the need to retain and support an understanding of Place in the way shared service was structured, delivered and managed.
 8. Noting the competitive market for planning staff, officers are asked to explore measures that will strengthen the recruitment and retention of planning staff.

Reasons for Recommendations

4. The main purposes of the Shared Planning Service are to provide improved services for customers while achieving efficiencies through joint working and increasing the resilience of the service.

Executive Summary

5. This report updates members on progress in developing a shared Planning Service between Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC), as agreed by members in 2015. It seeks agreement to a number of key principles underpinning the development of the service, a multi-phase programme of delivery, and early use of a “Greater Cambridge” designation. It also sets out an initial high level action plan, seeks agreement to the procurement of additional resources to support this, and identifies two key issues which will require early decision.

Background

6. In 2015 members of Cambridge City Council, South Cambridgeshire District Council and Huntingdonshire District Council agreed:
 - To approve the development of a project to design a Shared Growth and Planning Service, to be implemented in phases, with further decisions to be taken at key points.
 - To agree that the District authorities should continue to work with Cambridgeshire County Council to develop effective services together, and to explore options around their involvement in a shared service.
 - To adopt Key Principles for the Shared Growth and Planning Service which will shape the new service design and implementation (these Principles are set out in para 1.2).
 - To agree sharing of the costs of developing this model, and the appointment of a temporary/interim Transformation Manager as Workstream Lead
 - To ensure that staff in the affected services are involved from the outset, including the establishment of an officer group to co- produce the detailed plans for the new service.
7. The principles agreed by members comprised:

Guiding Principles (strategic level)

- Service quality and improving services for customers will be as important as achieving efficiencies
- The service will aim to keep customers at its heart, ensuring a tailored and comprehensive approach
- Sharing staff, transforming and streamlining services will all be considered in order to deliver savings
- Increased resilience and capacity will be a focus of service sharing
- The shared service will aim to create a stronger negotiating and collaborating position with developers, key customers and other partners, like the County Council and DCLG

Service Design principles (detailed level)

- Remaining close to customers in localities whilst considering a co-located

strategy function.

- A single portal for customers to support a streamlined service and deliver efficiencies for the more transactional services.
 - A single leadership post would be key to ensuring a strong link between strategy, policy and delivery and to manage the capacity of the workforce.
 - Transport and the role of the County will need to be an integral and integrated part of the new approach.
 - A commissioning approach to specialist services will need to be developed in collaboration with stakeholders and partners, taking into account and preparing the ground for wider opportunities.
8. Since 2015 other matters external but relevant to the planning services of partner councils have strengthened the impetus for the shared service. These include the continuing emphasis of national government on supporting housing delivery and economic growth, the moves toward a devolved Combined Authority and City Deal, and the continuing pressure on improving productivity and quality against a backdrop of growing pressure on local government finance. The recent LGA Peer Review at SCDC is also relevant. Within planning, the difficulties in recruiting suitably qualified staff to deliver the agenda of partner authorities have intensified, and national government has continued to encourage local plan production and speed of planning decisions by a number of means.
9. The combined Greater Cambridge planning service will be the largest shared service project, in scale and complexity of work as well as budget, undertaken by the local authority partners to date. It will result in one of the largest shire district council planning services in the country – processing more applications each year than the city of Bristol and will have a significant impact on customers and the future physical, social and economic environment locally. In the next 12 months, the service will be required to engage with significant policy and growth related development proposals. It is therefore particularly important that the project is carefully thought through and adequately resourced.

Progress to date

10. Huntingdonshire DC, through the 3C Joint Advisory Group, has decided not to proceed with active integration of the planning service at this time. In 2016 therefore a Joint Director of Planning and Economic Development serving both the City Council and SCDC was appointed. A project team of officers from both councils has been established and has held several workshops to consider how the services can be aligned and integrated, identifying priorities for action. This work has been supported by a 3C Programme Manager and Project Manager, who also support other shared service projects.
11. The associated Project Initiation Document(PID) for the project determines the scope of the shared service as comprising the following:
- Planning policy and strategy
 - Neighbourhood Planning
 - Consultancy/specialist services relating to development activity
 - Planning and related Application Processing (including trees and Listed Building Consent) and decision making
 - Planning Enforcement
 - Support for corporate and sub-regional projects (City Deal/Duty to Co-

- operate/LEP/Combined Authority support etc.)
 - Consultation and related responses on behalf of the local planning authorities
 - Economic Development (as defined by Corporate Plan)
 - Land Charges
12. The high level objectives underpinning the project are as follows:
- a) To create and deliver an effective programme for the creation of a single unified "Greater Cambridge" planning capability serving the Planning Committees of each of the participating Councils.
 - b) To build a shared capacity and capability within the combined teams (and provide opportunities to support others) in a way that seizes opportunities for efficiency and quality improvements by providing services and products (including additional charged services) that meet the needs of users and the community at the lowest net cost.
 - c) To deliver a service that can be flexible - in deployment and delivery
 - d) To build/retain a reputation for professionalism, staff development, the delivery of high quality outcomes and competent "business management" amongst peers and partners.
13. Work has begun to explore the potential future structure of the service, using the principles set out above. Officers recommend that the project proceed on the basis of a single unified "Strategy & Economic Development" division (all titles are provisional working titles at this stage), with subdivisions responsible for Planning Policy, Strategic Planning and Specialist Services.
14. For Development Management, given the size of the geographic area to be covered and the complexity and number of applications captured by the service the proposal is to continue to draw a distinction between the focused work of the strategic growth teams (new communities/neighbourhoods) and the more conventional "development management" activities – including enforcement activities. Officers are currently exploring the most appropriate means to organise these activities across the Greater Cambridge area and expect to bring recommendations following the conclusion of the current data analysis to a subsequent meeting of the Committee.
- A diagram of the proposed management structure is included at Appendix 2.
15. Integration, communication and appropriate consistency across the service are important considerations in order that service can be delivered in line with members' agreed principles. To make the best use of the combined skills/resources of the service, the service will need to extend the use of matrix management and will expect to increase project and programme management capability in order to optimise scarce planning resources and realise the broader objectives for the shared service.
16. A more detailed structure will be used as the basis for formal consultation will be prepared, further analysis is being undertaken using the data framework provided by the PAS resources review process. At this stage therefore members are being asked to approve the outline for the new management structure. The structure will continue to be developed, and a further report including a recommendation on future structure for formal consultation with staff and unions will be brought to a future meeting. A skills audit is also expected to highlight any additional capabilities required for the effective service implementation.

17. An Action Plan is in place which demonstrates that a number of actions can be taken (and are already being taken) forward quickly to align the two services before formal integration, a fully shared service will require implementation takes place in a number of phases, and members' understanding and agreement to this approach is sought. Future work will identify a number of critical points at which "stop/go" decisions can be made.
18. One action which officers suggest can be taken quickly, and is highly symbolic of the move towards the integrated shared service, is that all relevant staff should have, below their email signatures, a strapline stating "Greater Cambridge Planning Service" as well as that of their current employing authority. This will form part of a wider move to define the "shared service" as a single entity (with common templates and consistent processes) in the minds of members and users. Both services will, for example, be collaborating in delivery of a planning "open day" showcasing the work of the two services and seeking to re-engage more with residents and local businesses and to help build an understanding of forthcoming changes.
19. Through visits to and reflections upon earlier shared service implementations, the importance of resolving key ICT infrastructure decisions has been repeatedly emphasised. Planning, and particularly Development Management, is highly dependent on an efficient ICT system. This includes customer access and communication, GIS and management information capabilities, as well as the ability to produce documentation associated with planning decisions and committee reports at minimal cost. In the case of Greater Cambridge, a seamless Geographical Information System enabling electronic mapping of both council areas will be essential, and will need to be integrated into the overall ICT. The two authorities currently operate different ICT systems – neither of which embraces fully the capacity for agile, mobile and multi-site working. The review and commissioning of an appropriate ICT solution is therefore a critical part of the programme towards integrated working and should be commenced now to enable the process optimisation/re-design central to the successful implementation of the shared service.
20. The consideration of the ICT system will break down into three main phases: scoping the requirements, specifying, and procuring and implementing the system. Officers have begun to identify potential process improvements and efficiencies which logically would form part of the scope of a new, joint system. As procurement is likely to take some time, it is proposed that resources will be assigned to this element in order that officers are able to provide recommendations to the Committee on programme and cost considerations associated with ICT integration alongside other organisational change costs later in the year.

Resources

21. Experience from 3C service implementations indicates that a focused and dedicated core resource is required to ensure effective implementation. This is particularly important given the large number of strategic projects that both planning services are engaged in or are directly supporting, as well as the critical "front line" services provided in both councils. Most of the core project team are managers with existing roles whose time available for implementation alongside their existing workloads is limited.
22. It is therefore proposed that a small implementation team is created, comprising two

experienced members of staff be seconded full time to the project to work alongside the 3C project support resource and the SCDC Service Excellence officer in order to provide local, professional insight and input into the project. The two officer posts will need to be backfilled to release these staff to focus fully on the significant practical and operational measures required to align and then integrate the two services successfully. Specialist ICT input to scope a new system will also be required, most likely from 3C ICT. Additional project management support, business improvement and critical friend input is also to be retained – to ensure that the project can benefit from the insight provided from other shared planning services and service optimisation activities across the country. This role is currently being provided by Fortismere Associates but will need to be tendered again as the project continues.

23. The resources plan for the project will need to be refined to reflect estimates for ICT implementation and the costs of change within structures etc. – as the organisational structures and operational format for the service are developed. The Project PID identifies current combined resource requirements as follows:
 - 2 No Principle/Senior planning officer posts (backfilling for initial period of 10 months) (£85K)
 - Additional communications/stakeholder engagement and service definition costs £10K
 - ICT consultancy costs (system capability audit/review) £20K
 - Critical Friend and project/programme support £XXX
24. The additional resources required to carry out this project may, subject to details on implementation, be offset against the 20% increase in planning fees from July 2017 flagged in the recent government White Paper “Fixing Our Broken Housing Market”, which is predicated on the revenue raised being invested in the planning service. The White Paper also raises the possibility of further fee increases being available to councils which are delivering housing. Other potential avenues for offsetting the additional short term resourcing required for the project implementation are being explored.

Implications

Financial

25. The implementation of shared services has an expectation that net service costs to the constituent authorities will be reduced. At this stage, officers are continuing to explore and will need to model the potential benefits offered by the shared service operations following set up but are basing the service assumption on an aspiration to achieve the 15% net cost reduction amongst partners sought through the other shared service projects.

Legal

26. 3C Legal Services has been identified as a workstream of this project and will be liaised where necessary during the life of this project.

Staffing

27. There are clear implications for staff affected directly by the move to a shared service, including some who may currently be managed outside the planning service. A staff engagement processes (including appropriate engagement with the Trades Unions) will be followed in line the respective corporate processes of the constituent authorities. In addition, staff newsletters, data sharing exercises and

informal information briefings and experience sharing activities are already underway to improve understanding between the respective services.

Risk Management

28. Risk register in place and will be reviewed throughout the project.

Equality and Diversity

29. An EqlA has been carried out and will be reviewed and updated during the phases of the project.

Climate Change

30. Low to Medium Positive Impact.
The opportunities offered by increased resilience in service delivery and the ability to recruit and to provide specialist support over the wider Greater Cambridge area should result in a positive impact on the quality of new development.
The likely reduction in accommodation and energy use associated with a shared service will have a positive impact. Potential negative impact from increased travel will be mitigated by increased mobile and remote working.

Procurement

31. The shared service will require appropriate advice to be secured throughout implementation, as well as the likely procurement of a new ICT contract for both Councils.

Consultation and communication

32. This will be conducted in accordance with the Council's agreed policy.

Effect on Strategic Aims

33. This project will assist in meeting the following corporate objectives
Homes for the future
Connected Communities

Background Papers

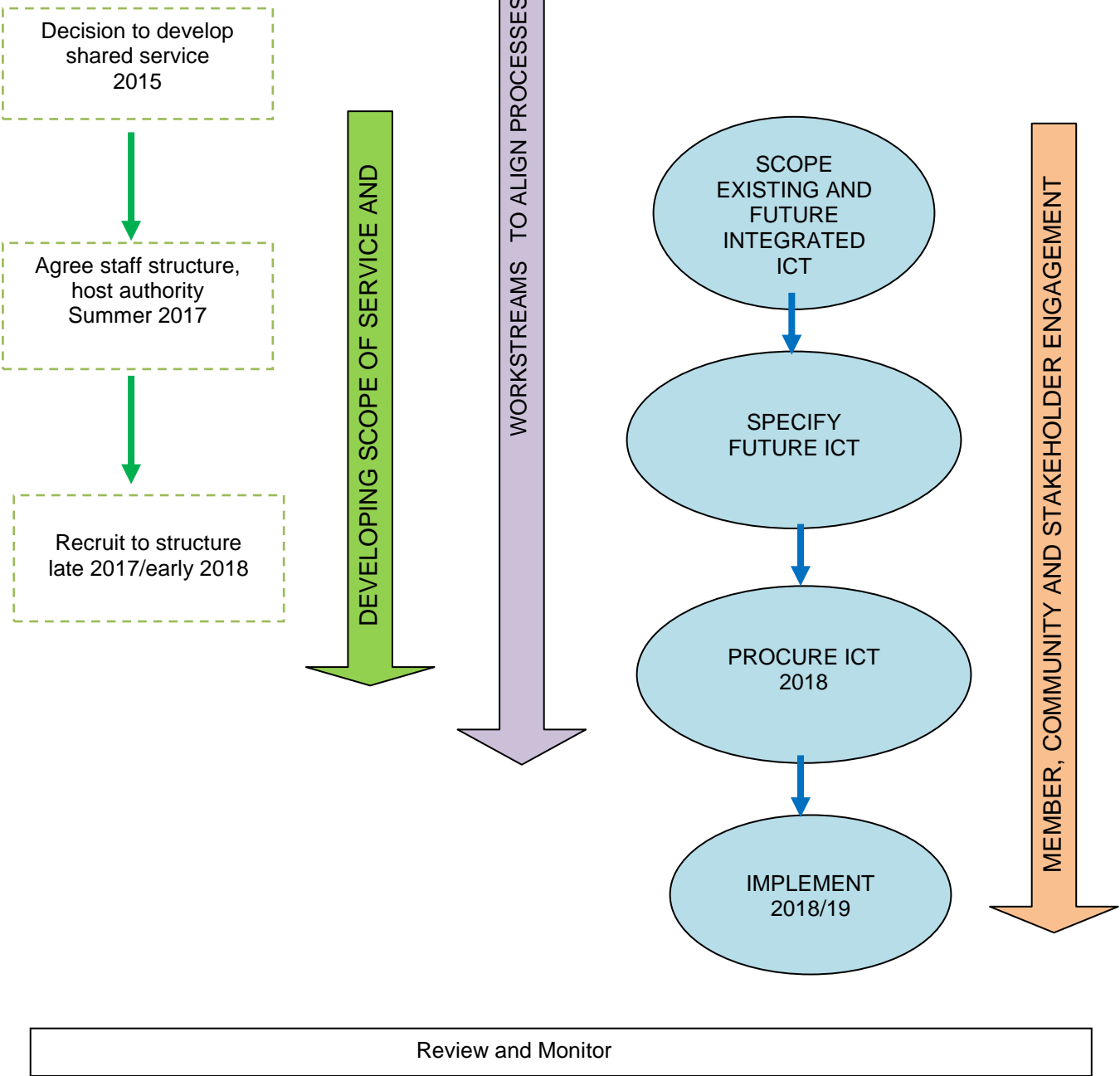
These background papers were used in the preparation of this report:
Shared Service Overview – Strategy and Resources – 13 July 2015

Appendices

Appendix 1 - Process Chart
Appendix 2 - Broad Principles of Future Structure

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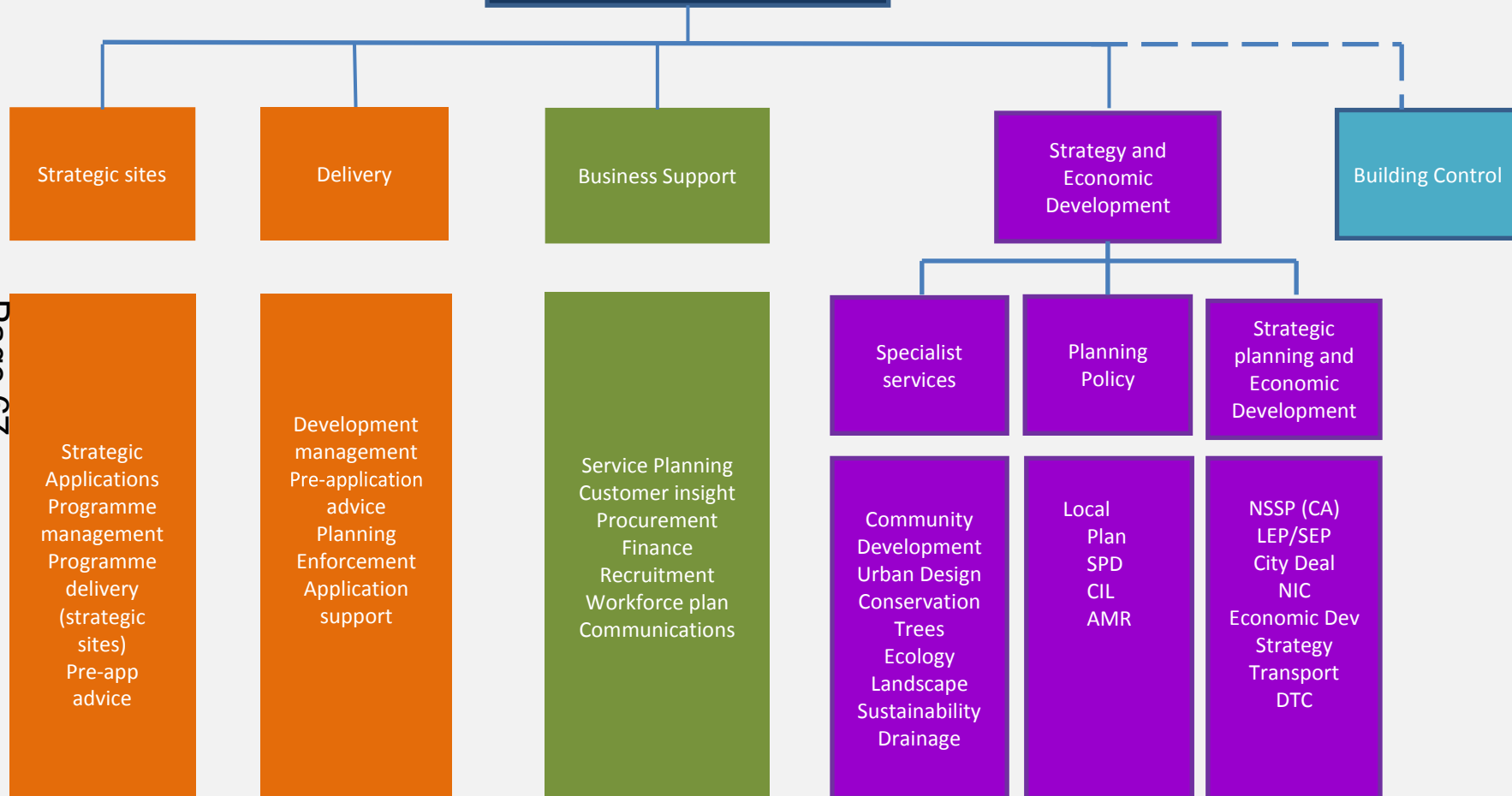
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Appendix 2

Joint Director Planning and Economic Development



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Agenda Item 10

REPORT TO: Cabinet

20 April 2017

LEAD OFFICER: Joint Director, Planning and Economic Development

Development Management Performance Report – March 2017

Purpose

1. This report provides a snapshot of the current performance of the Council in the speed of determining planning applications. Performance is measured against the DCLG criteria set out in *Improving planning performance: Criteria for designation (revised 2016)*, DCLG November 2016.
2. In respect of planning applications, the 2018 designation thresholds and assessment period are as follows:

Major applications

60% of applications determined with the statutory period or within the agreed Extension of Time or Planning Performance Agreement between Oct 2015 and Sept 2017.

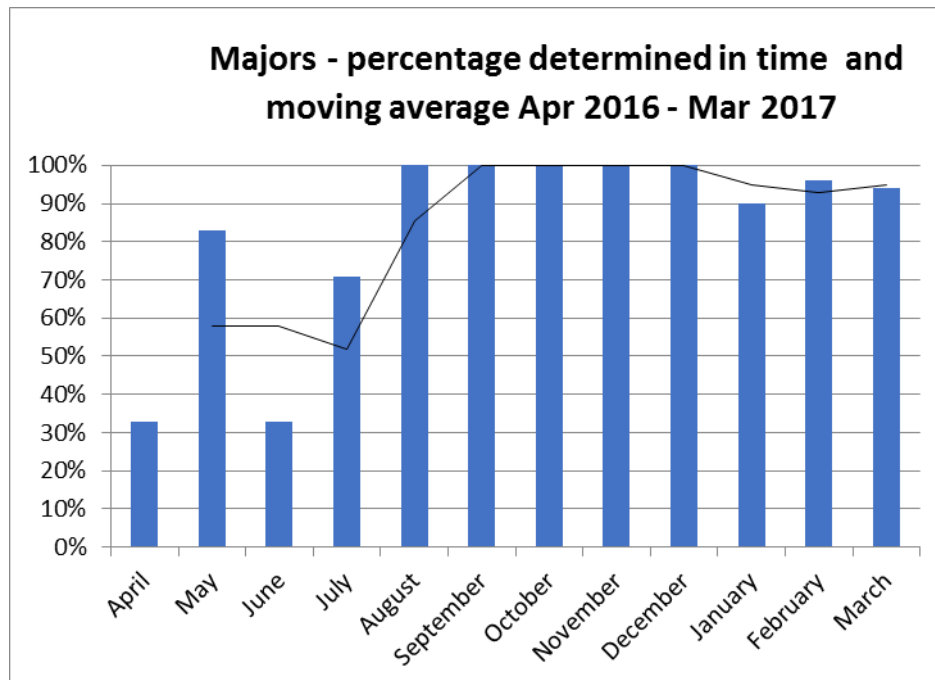
Non-major applications

70% of applications determined with the statutory period or within the agreed Extension of Time or Planning Performance Agreement between Oct 2015 and Sept 2017.

3. The average percentage figure for the whole of the assessment period is used.
4. The data is provided for information and shows that the Council's performance is above the designation thresholds for both major and non-major applications.

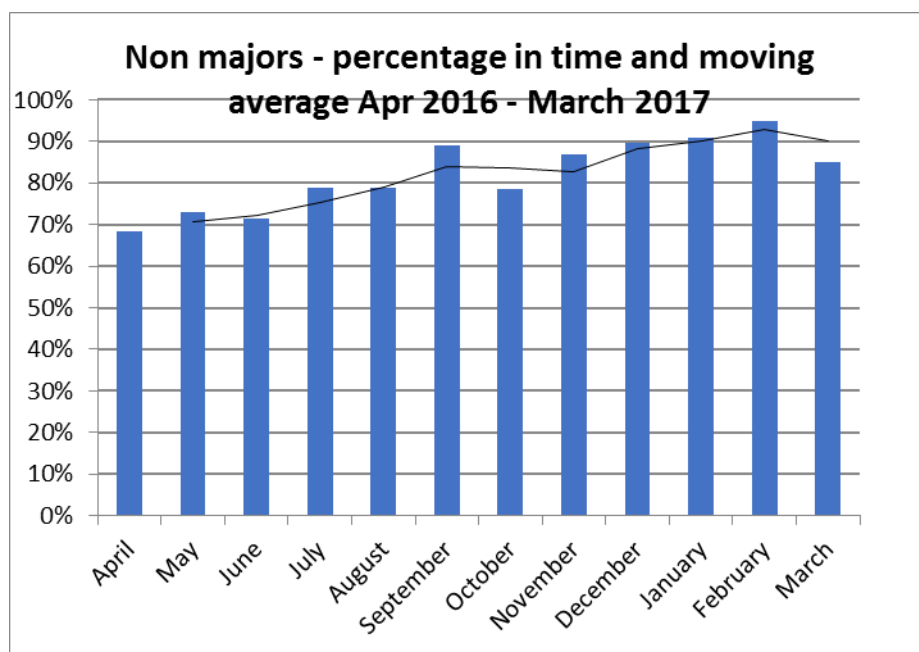
South Cambridgeshire District Council
Planning Applications – speed of determining applications up to end of March 2017

Major applications



Majors	
Month	Percentage in time
April	33%
May	83%
June	33%
July	71%
August	100%
September	100%
October	100%
November	100%
December	100%
January	90%
February	96%
March	94%

Non-major applications



Non Majors	
Month	Percentage In Time
April	69%
May	73%
June	72%
July	79%
August	79%
September	89%
October	79%
November	87%
December	90%
January	91%
February	95%
March	85%

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