

Cambridge and South Cambridgeshire Local Plan Examination

Inspectors' Preliminary Conclusions – May 2015

The Councils submitted the new Local Plans for examination on 28 March 2014. Laura Graham BSC MA MRTPI has been appointed to examine the soundness of both Plans and is being assisted by Alan Wood MSC FRICS. A number of joint hearing sessions have been held between November 2014 and April 2015. Hearing sessions have included development strategy, housing need, Green Belt, transport and housing delivery.

The Inspectors had previously indicated that they would write to the Councils if they had any concerns about the submitted Local Plans. They have now written to advise the Councils of a number of issues they consider need to be addressed at an early stage rather than waiting for the end of the examination hearings.

The Inspectors have advised that they consider the best course of action would be for the examinations to be suspended while the Councils carry out further work to respond to the issues raised.

Key issues raised:

- **Overall development strategy** – the Inspectors raise questions about the Councils' approach to testing alternatives for the development strategy, including the sustainability merits of the urban edge of Cambridge versus new settlements. As part of that they raise the issues of any potential conflict with Green Belt purposes and deliverability of infrastructure improvements. The Inspectors are not reassured on evidence available at this stage that the Plans will deliver sustainable development, in particular infrastructure requirements for sustainable transport. The Inspectors have indicated that the way the Councils' evidence base is presented does not aid clear understanding of how the various dimensions of sustainable development were assessed. They indicate that such an exercise would be expected to have been clarified through the Sustainability Appraisal/Strategic Environmental Appraisal (SA/SEA) process. They also raise some questions around the Green Belt methodology used in the Green Belt review work. In particular, they raise significant concerns about the way that the edge of Cambridge (as a location for more development) was dealt with through the SA/SEA process and suggest that the Councils revisit the SA/SEA process so as to reappraise all reasonable alternatives (including sites on the urban edge) to the same level of investigation as the preferred option contained in the submitted Local Plans, and to consider whether any modifications are necessary based on that work.

- **Objectively assessed need for new housing** – The Local Plans provide for 14,000 new homes in Cambridge and 19,000 in South Cambridgeshire. The Inspectors raise concerns about whether the Strategic Housing Market Assessment which calculates objectively assessed housing need has properly taken “market signals” into account, particularly in relation to affordability. In particular, the Inspectors are concerned that the Councils’ approach does not fully take into account advice on market signals in the National Planning Practice Guidance (published in March 2014 just at the time the Plans were submitted). The practice guidance indicates that an assessment of market signals should be carried out (e.g. local house prices and affordability), and consideration should be given as to whether an upward adjustment to planned housing numbers would be appropriate to address this, and the likely outcomes that would have on the provision of affordable housing. The Councils have also been asked to consider whether the 2012 based national household projections published in late February 2015 suggest different levels of housing for the Plans.
- **Conformity with Revisions to National Planning Policy** – the Inspectors have invited the Councils to undertake a rigorous audit of both Plans against two recent Written Ministerial Statements (published after the start of the examination hearing sessions) providing updated national planning policy in relation to affordable housing on small sites, Housing Standards and car parking provision amongst other things and to propose modifications to ensure compliance with those statements.

The Inspectors emphasise, for the avoidance of doubt, that their letter should not be interpreted as an indication that further releases of Green Belt land would be necessary to ensure the soundness of the plans. The Councils need to clearly explain the development strategy, the weight given to considerations such as Green Belt protection and how the challenges of delivering sustainable development in the proposed new settlements will be met and update the evidence base accordingly. Proposed modifications to the Plans may flow from this work.

The Inspectors recognise that the Councils will be disappointed by their preliminary conclusions but say that they look forward to hearing how the Councils wish to progress together with a timetable for undertaking the further work identified, including any periods of public consultation.

Taken objectively, the letter gives a clear steer on the work to ensure that the Inspectors can find these parts of the Plans sound. The Councils will be considering the specific work needed and the associated timescales over the coming weeks in order to respond to the Inspectors.