

LOCAL PLAN EXAMINATIONS CAMBRIDGE CITY and SOUTH CAMBRIDGESHIRE

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Your Ref:

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Mrs S Saunders
Planning Policy Manager
Cambridge City Council

Mrs C Hunt
Planning Policy Manager
South Cambridgeshire District Council

Dear Mrs Saunders and Mrs Hunt

Cambridge City Local Plan Examination and South Cambridgeshire District Local Plan Examination

Thank you for your letters dated 30 June 2015. Turning to the specific points you raise:

Level of detail in the evidence base

It is difficult for us to comment on the level of detail that may be required, but there are two key questions that need to be addressed. Firstly, there is a requirement that all reasonable options should be assessed at the same level of detail through the sustainability appraisal. Secondly, the evidence base needs to demonstrate that the chosen options can be delivered in accordance with the expected timetable.

The level of detail required is likely to be dependent on the nature of the proposal. Taking the example of the A428 segregated bus link, an offline route may require a greater level of detailed information to demonstrate that it can be delivered because of the potential problems involved in land assembly, as compared to an online route, although much will depend on the particular circumstances of the case.

In any event, we would urge as much transparency as possible with regard to the evidence presented. It became apparent at some of the hearing sessions that not all participants were aware of the scope of information that may have been available, for example in relation to transport modelling. Clear audit trails and signposts to where the underlying data can be found should enable stakeholders and representors to understand what is available and where it can be found.

Other Modifications

We agree that any wider modifications arising from the work undertaken should be addressed as part of this process. We also draw your attention to the recent Ministerial Written Statement (WMS) regarding onshore wind turbines. The expectation of the WMS

is that any future wind energy development must be in an area identified as suitable for wind energy in a local or neighbourhood plan. On the face of it this has implications for Policy CC/2 of the South Cambridgeshire Local Plan and Policy 29 of the Cambridge City Local Plan. The Councils should therefore draft modifications to ensure the Plans conform with the WMS. The Councils could consider whether they wish to identify areas suitable for wind development as part of the work being undertaken during the suspension of the examinations and propose amendments to the policies and policies map accordingly. Alternatively, the options would appear to be as follows:

- Amend the criteria-based policies to make it clear they do not apply to proposals for wind turbines, which will be considered against the WMS. If you consider it appropriate, the Plans could also be modified to indicate that wind turbines will be considered in a subsequent review of the Plan or a single issue DPD; or
- Add to the existing criteria the additional WMS test indicating that a wind turbine must be in an area identified as suitable for wind energy and fully address the planning impacts identified by local communities. This would mean the plan would include the up-to-date policy and support any future part of the development plan (including neighbourhood plans) that identifies suitable areas. The rationale should be provided in the supporting text to avoid a situation where a Plan requires wind turbines to be in identified areas but does not identify such areas.

Whichever option is chosen, you may consider it appropriate to undertake sustainability appraisal and public consultation to any proposed main modifications to these policies alongside that undertaken on other proposed modifications which arise as a result of other work undertaken during the suspension.

Next steps

We have no comment to make on the timetable you set out. We appreciate that there is a substantial amount of work to be done, and look forward to receiving updates on progress via Ms Alexander. In general terms, we expect the examinations to resume with any hearing sessions that may be necessary on joint topics such as housing numbers and housing land supply, which may need to be revisited in the light of new evidence. We would then expect to continue with topics relating to the Cambridge City Plan and finally topics specific to the South Cambridgeshire Plan.

During the autumn we will endeavour to provide an outline programme together with matters and issues, so far as possible before the work you are undertaking has been completed. With Ms Alexander's help, we will endeavour to be in a position to publish a full programme as soon as possible after February 2016. To expedite matters we are currently considering whether it would be possible to progress the CIL examinations whilst the Local Plan examinations are suspended. We have not yet come to a view on the feasibility of this but would welcome any views you may have, for example whether you would be able to resource the CIL examinations whilst undertaking work on the Local Plans.

Joint Housing Trajectory

We did not comment on this issue in our letter because any questions regarding five year housing land supply are inextricably linked to the objectively assessed need and housing requirement. As further work on the objectively assessed need for housing is being undertaken during the suspension, we do not think it would be possible to issue a partial report, even if public consultation were undertaken on the modifications you have proposed to date.

Gypsy and Traveller Accommodation Needs Assessment (GTANA)

We agree that a review of the GTANA 2011, which predates current advice, would be beneficial. Given that this work will need to involve other local authorities, as well as representatives of the Gypsy and Traveller communities, we understand that a slightly longer timetable may be necessary. However, a robust evidence base which complies with current guidance may well avoid further delays at a later stage in the Examinations.

Conclusions

We recognise that the Councils have taken a positive approach to addressing the concerns set out in our letter of 20 May 2015. We consider that the scope of what you propose provides a sound rationale for the suspension of the examinations but, for obvious reasons, we cannot comment on the potential outcome of the work. The Local Plan examinations are hereby formally suspended until March 2016. We look forward to receiving progress updates from the Councils which should be published on the websites.

For the avoidance of any doubt, we are not inviting any comments or other submissions from representors during the suspension of the examinations and any such unsolicited correspondence will be returned.

Laura Graham

Alan Wood

Inspectors