

The Greater Cambridge Local Plan: Lessons Learned and Good Practice



A Report of Stakeholder Experience of Local Planning in Greater Cambridge and Wider Good Practice in Plan-Making, and the Implications for the new Greater Cambridge Local Plan

September 2019

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Executive Summary

This report is commissioned by Cambridge City Council and South Cambridgeshire District Council, working jointly as the Greater Cambridge Shared Planning service. Its purpose is to help the authorities learn from the experience of preparing their recently adopted Local Plans, to inform the new joint Greater Cambridge Local Plan.

The views of a range of stakeholders with an interest in the adopted plans and new joint plan have been sought to gain an in-depth understanding of the lessons that can be learned.

The report also draws together good practice and guidance that exists with regard to Local Plan preparation and reaches overall conclusions, which could have a bearing on the preparation of the new joint Greater Cambridge Local Plan.

Lessons Learned

28 individuals from 18 stakeholder organisations representing a range of interests were invited to participate. 14 individuals were able to take part. Engagement was through structured interviews and discussion covering the plans' content and preparation.

There are acknowledged limitations to this type of research: the number of respondents, often with specific interests, means that the views expressed are not necessarily widely representative. However, this is a qualitative study and the nature of engagement allows for in-depth discussion and probing of views expressed. The findings represent stakeholders' genuinely-held views on the opportunities and challenges to carry forward into new plan, based on recent experience.

Participating stakeholders' views are recorded and analysed in the report. The findings also take account of the outcomes of recent stakeholder workshops run by the local authorities, which included a brief discussion of the lessons that might be learned from the preparation and content of the adopted plans.

The principal findings that are drawn from the interviews focus initially on those areas where there was some degree of consensus between stakeholders. The lessons highlighted in the report are:

- Most if not all stakeholders are generally supportive of the approach to and outcomes of the last round of plan-making, acknowledging the complexity and challenging nature of the issues, with acute development pressures and public scrutiny.
- The extent and type of engagement is important to most stakeholders, particularly where this can have a positive bearing on defining the key issues and options. This should occur before more formal consultation and should utilise a range of formats, reflecting the needs of different stakeholders.

- Consultation questions should focus on *how* key issues should be addressed, as this has a direct bearing on spatial and policy options, rather than questions where the answer may reasonably be considered to be self-evident.
- The plan's policy content should include a central focus on climate change and biodiversity, while travellers' accommodation needs remains a challenging issue that requires a strategic, corporate approach.
- Topic-based strategy documents could help bridge the gap between the technical evidence and the content of the plan itself; and could inform an iterative narrative to support the rationale for the plan's strategy.
- The length of the plan and the extent of supporting evidence should be more proportionate. These ambitions should be informed by a rigorous review of existing plan policies to ensure that only useful and effective policies are carried forward into the new plan.
- Ensuring effective information management and co-ordination of evidence production and presentation is critical, particularly given increased organisational complexity.
- For the examination, it is important to attempt to reduce the number of objections through a clearer approach to engagement with stakeholders throughout the plan preparation process. A proactive and assertive approach should be taken through early engagement with the Planning Inspectorate, to ensure key messages and lessons from the last, lengthy examination are conveyed and heard.

Good Practice

This section of the report considers good practice in plan-making in terms of national guidance and specific examples of joint Local Plans that might help inform the Greater Cambridge Local Plan.

Despite engagement for the project with practitioners and professional planning bodies, examples of good practice in plan-making are not easily to be found. New policy challenges and stringent soundness tests introduced with the publication of the National Planning Policy Framework (NPPF) in 2012 are a contributory factor.

In addition, with publication of the NPPF there has been a significant reduction in the amount and scope of national policy; and government has a diminished role in providing practical planning guidance, including good practice case studies.

The Planning Advisory Service has filled this breach to some extent. Its 2014 guidance on good plan-making remains the most comprehensive recent guidance of its type. It includes principles against which to measure effective plan preparation and outcomes, a number of which reflect the experience and lessons referred to by stakeholders engaged in this project.

Other aspects of good plan-making can be found in topic-based practical guides published by the Town and Country Planning Association.

The report of the Local Plans Expert Group to government provides guidance on proportionate approaches to Local Plan evidence and the style and content of plans.

The most positive experiences of joint planning on a scale and geography not dissimilar to that of Greater Cambridge can be found in the joint plans for Central Lincolnshire and Greater Norwich. Both of these groupings of three authorities have adopted and are now reviewing statutory joint plans. As such, both areas may have valuable experience and lessons to share.

Finally, the award-winning approach to stakeholder and public engagement in plan-making in the Lake District National Park, and the work of the Leeds Climate Commission provide examples of effective practice covering two topics that were highlighted by stakeholders as being of particular significance.

Conclusions

One of reason for scrutinising the last round of plan-making is to gain a better understanding of why the process lasted seven years, with more than half of this taken up by the post-submission examination stage. Some stakeholders suggested that this is largely down to the approach of the Inspectors who examined the plans, while others point to the nature of the strategy, the extent of objections and the weight of supporting evidence.

An important question for the authorities this time around is, despite the timetabling pressures already in place, could investment of more time at the front end of the overall plan process reap some benefits in the latter stages, particularly at examination.

1. Introduction

This report is commissioned by Cambridge City Council and South Cambridgeshire District Council, working jointly as the Greater Cambridge Shared Planning service. The two authorities adopted separate Local Plans towards the end of 2018¹ and have now embarked on the preparation of a statutory joint Greater Cambridge Local Plan. It is understood that this will involve a full review of the two adopted plans, which will extend the existing development strategy from its current end date of 2031, to at least 2040.

The authorities wish to learn from the experience of preparing the two adopted Local Plans to inform the new joint Local Plan. Work to develop the two plans to full submission draft versions took place between 2011 and 2014. The plans were submitted to the Secretary of State for examination in March 2014. In August 2018, the Inspectors conducting the examination issued their final report and concluded that the plans are sound, subject to a number of main modifications.

One of the main reasons for scrutinising the last round of plan-making is to gain a better understanding of why the process lasted seven years. The longest phase of the overall process was from submission to adoption, over four years. Much of this was taken up by the hearing sessions and the Inspectors' reporting time. These matters were, and are likely to remain in future, largely outside the control of the local planning authorities. However, the authorities consider it important to scrutinise critically and objectively the plan-making approach and process as a whole to understand the influence of different issues on intended outcomes and timescales.

The authorities consider that gathering the views of a range of stakeholders with an interest in the adopted plans and new joint plan is essential to gain a wider understanding of the lessons that can be learned than would be the case from a purely internal exercise. Consequently, the views of a range of interested stakeholders were sought on these matters, which are reported with accompanying analysis.

The report also draws together good practice and guidance that exists with regard to Local Plan preparation and draws overall conclusions, which could have a bearing on the preparation of the new joint Greater Cambridge Local Plan.

¹ The Cambridge Local Plan was adopted in October 2018 and the South Cambridgeshire Local Plan in September 2018.

2. Lessons Learned

2.1 Introduction

A range of stakeholders with an interest in the adopted Local Plans and the new joint Greater Cambridge Plan were invited to participate in the 'Lessons Learned' project. Their participation involved a structured interview, typically lasting between 45 minutes and an hour. Questions were open and non-technical, with the aim being to gain the respondent's views on both the approach taken to the last Local Plans and how these reflections might influence thinking about the new Local Plan. The intention is that this will help to ensure that the preparation, process and outcomes are as effective as possible.

The topics covered in the structured interviews were as follows:

- the scope, content and structure of the Local Plans;
- programme and project management;
- the evidence base;
- the approach to issues and options;
- consultation and stakeholder engagement;
- policy development; and
- examination of the plans.

Around 28 individuals from 18 stakeholder organisations representing a range of interests were invited to participate. 14 individuals were able to take part. These included councillors, council officers and representatives of government agencies, higher education institutions and campaign groups. A response rate of 50% for a survey of this kind is positive, particularly as a good variety of interests participated, representing the general breadth of those invited as a whole. Invitees are listed in Annexe A, with those taking part marked with an asterisk.

The main points made during the interviews are provided below, with views summarised under the relevant topic heading. Views are provided anonymously rather being attributed to specific stakeholders. This was agreed at the outset of each interview as it is considered that non-attributable comments are more likely to reflect an open and potentially less guarded view.

The section that follows the interview summaries draws out the main lessons from the stakeholders' views on the preparation and content of the adopted Local Plans. The implications of these findings for the Greater Cambridge Local Plan are then explored.

2.2 The Main Points made during Stakeholder Interviews

The headings set out below reflect the questions that were asked during the interviews, although in a number of cases several questions have been merged to provide a single heading.

In broad terms what was considered good or not so good about the content and/or preparation process of the adopted plans.

A number of stakeholders saw the plans as a clear progression from the previous 2006/7 plans (one respondent singled out various standards required by plan policies, such as internal and amenity space standards and mobility standards, as providing greater certainty of outcome from new development). One comment was that the most recent plans were an 'extension' of the strategy in the 2006/7 plans, which were more challenging plans to prepare as they were implementing a new development strategy first included in the 2003 Structure Plan.

Some acknowledged that both plans, but particularly the Cambridge Local Plan, are quite long. However, this could be seen as a positive response to a range of strategic and community-based local issues that needed to be addressed, including in response to matters raised through early engagement. On the other hand, some respondents commented that the plans were too long and should be more focused in terms of their content, including not repeating elements of national planning policy.

One stakeholder who had wider experience of plan-making considered the plans to be amongst the best in a national context, recognising the complexity and controversial nature of the issues. The strategy is inevitably the most challenging element, while the development management policies generally flow from the issues identified. The policies are considered to be comprehensive and well-expressed. More generally, there was recognition of effective collaboration and joint working between the two Councils. Another respondent referred to the development of a coherent strategy across the two areas.

Respondents recognised that the plans follow a largely standard format, but some considered that the content could better reflect the uniqueness of Greater Cambridge. This is captured to a large extent in the plans' visions, but is not so clearly followed through in the strategy or policies. One example given in this regard is the lack of a clear strategy to ensure that the area continues to thrive as a global research centre, with the implications of this 'translated on the ground'. Also, the plans do not go far enough for some respondents in utilising the area's particular intellectual resources and ability to respond locally to global challenges, for example with regard to being innovative in the use of renewable energy.

The view was also expressed that the plans do not strike a sufficient balance between what makes the area special and the impact on this of potentially unsustainable levels of growth. The implications of different levels of growth should

be assessed for their impact on quality of life and the environment. In particular, Cambridge is not just of national economic significance, it is also an internationally-recognised historic city. Consequently, the impact of development on the historic city should have been better understood through the Local Plans and the evidence to support them.

Some respondents commented on the challenges of joining-up spatial planning with transport strategy; and that some subsequent funding initiatives, particularly the City Deal, were essential to enable delivery of the plans' strategies.

A number of respondents highlighted the problems of establishing clear and agreed evidence of the level of housing need, including how this relates to and supports economic growth. Others commented on the length of time taken from inception to adoption and that the wider policy agenda had in the meantime moved on. It was felt in this regard that climate change and biodiversity are not adequately addressed, and that the approach to affordable housing is not up-to-date (national policy now requires viability to be assessed at a plan rather than individual site level). More generally, the danger of such a long preparation process is that the evidence as a whole, or key parts of it, might be out of date soon after a plan is adopted; for example, the 10% renewables target, which is based on old evidence and not sufficiently ambitious.

Member participation and engagement in the plans could have been more effective, particularly early in the process. All members of a council need to understand and have 'buy-in' to a plan, particularly to be able to explain it to local communities. Furthermore, the strategy and choices of development locations needed a stronger narrative to support them and to provide justification for the choices made and evidence underpinning this. In some instances, it appeared that the least preferred, or middle ranking, option for a development location was chosen and it was not clear why this was the case.

Concern was also expressed about an apparent lack of integration between the upper and lower tier authorities, where the more highways-focused approach of the county council does not always facilitate effective realisation of district councils' policies, including those dealing with urban design and climate change. More generally, there is a need for greater ambition in terms of achieving a greater modal split in favour of sustainable transport. District and county council officers considered that generally there was good engagement between the different local government tiers, with evidence of strong partnership working.

On a technical level, it was noted that the need to update the Cambridge Sub-Region Transport Model part way through the Local Plans process was not helpful. This raised consistency issues with the available evidence and caused some delay. There is now a much stronger base case and the modelling approach is in a more steady state, which will provide greater certainty for the new plan.

Supplementary Planning Documents have some limitations in their ability to deliver required outcomes on the ground. SPDs should be used sparingly, with more direction on development proposals in the plans themselves, or Area Actions Plans if these are required to provide more detail for implementation of strategic developments.

Reference was made to the dispersed nature of policies and that it would be better if policies are grouped together to reflect a particular policy approach or topic. One example cited was water management policies where the approach should be to present these as a single topic, integrated with other key issues such as biodiversity. It was felt that the Cambridge Local Plan provides the better model to follow in this regard for the new joint plan.

How effective was the approach to engagement in enabling views to be put forward; and were local communities with a stake in the plan(s) sufficiently well engaged?

A number of respondents were concerned about the clear distinction, as they saw it, between consultation and engagement. They felt that the plans tended to focus more on consultation where strategy and policies were already in place, or the Councils' thinking was well-advanced, and there was limited opportunity to influence outcomes. Most respondents wanted more and earlier stakeholder engagement, before issues and options consultation and/or throughout the plan preparation process to submission. One respondent linked this to the importance of the Councils bringing communities with them and explaining the purpose and outcomes of the plan.

Reference was made by a couple of respondents to the fact that the adopted plans did involve quite extensive early engagement with different approaches, including use of local media, exhibitions, parish forums, etc. A significant challenge, however, is engaging with those who typically don't participate (so called 'hard to reach' groups). For the new plan, the local authorities need to reflect on the resources and skills required to do this effectively.

One respondent referred to a 'missing stage' at the beginning of the process, a first stage which should pose very broad questions to try and achieve a degree of consensus about the direction of the plan and key issues. Workshops are welcome in this regard, but these should not be a one-off event but part of a wider approach to engagement before consultation takes place. Most people are trying through engagement to address the underlying objectives of the plan, but the approach to issues and options did not allow sufficient scope to do this. Some respondents considered that the second issues and options consultation on the plans should have been done earlier in the process and more time allowed to reflect on the implications for the strategy and policies.

It was noted that the approach to front-loading a plan's preparation and adequacy of engagement is an internal decision for the Councils and one that needs to be

proportionate in the overall plan process. However, the importance of engagement should not be under-estimated as it can help to achieve substantive outcomes as well as avoid concerns later in the process that inadequate engagement took place. On the same theme, another respondent noted that there is a difficult balance to achieve with early engagement, particularly given the range of different interests involved and the need to ensure that the plan's progress is not overly-prolonged.

The manner in which people and organisations are engaged is important. Government agencies welcomed one-to-one meetings with Council officers, while workshop-type meetings are more likely to be appropriate for groups of residents' associations or parish councils.

A number of respondents referred to the extent and depth of stakeholders' knowledge and experience, which could genuinely help deliver important objectives, for example around affordable housing or innovative measures to address climate change. An important consideration is achieving as much consensus as possible through engagement on the relevant issues and how they might be addressed *before* moving to issues and options consultation.

It was noted that engagement and consultation needs to be actively promoted in relation to both the plan and key related documents. For example, there were limited responses to consultation on the Sub-Regional Transport Strategy prepared alongside the Local Plans, but this is of significant importance to the plans and development strategy.

A representative of community interests commented that the quality of consultation documents was good, including the clarity of presentation, which was easily understood by the lay person. On the other hand, another stakeholder took the opposite view: the stages and nature of consultation was largely impenetrable and unmanageable for the average person.

One respondent considered that there had been positive engagement work between the Councils and residents' forums, capturing key issues and reflecting them back in the plans. Even if stakeholders didn't agree with the substance of the Councils' response, there is clear evidence of positive engagement. Positive and on-going engagement could help to manage down the number of objections to the next plan.

Another respondent noted that sharing draft policy wording before formal consultation, where it is specifically relevant to a particular government agency's interests, is helpful and enables potential objections to be addressed. However, it was less helpful not to be informed that an Area Action Plan for a strategic development location was to be downgraded to a Supplementary Planning Document, as this resulted in challenging delivery and policy issues.

Do the plans define a clear and locally relevant vision and objectives?

The majority of respondents felt that the visions in the two plans were strong and locally-focused. The greatest challenge, however, is relating the visions and objectives to the strategy and policies that should flow from them, as well as actually delivering clear outcomes supported by the necessary infrastructure. Some respondents felt that the visions had limited influence on the outcomes in terms of the strategy and policies.

In this regard, one respondent wanted to see more elaboration in the plans of how to maintain Cambridge as a compact city, i.e. the practical implications of this related to the spatial growth options presented. Another said that the plans felt like they were all about numbers - homes and jobs - rather than building communities.

Another respondent felt that the vision and objectives struck an appropriate balance between the needs of a growing population and city, and protection of what makes the area special, including the historic environment. Reference was also made to national policy concepts and issues that have arisen since the last plans that need to feature in the new vision, particularly the idea of natural capital, which is a cohesive concept bringing together elements of biodiversity, climate change, etc.

Another commented that the authorities had some challenges at the start of the plan-making process as they were operating in effect in a 'policy vacuum' with the introduction of the National Planning Policy Framework (NPPF) and loss of the topic-based national policy documents that it replaced.

Were the critical issues for the area set out clearly in the plans, particularly at the issues and options stage?

Some respondents felt that the issues and options consultation was too focused on spatial options in terms of housing numbers and development locations, rather than starting with the nature of the spatial strategy and the different broad options available. These could include, for example, a dispersed or more compact form of development, recognising the importance of public transport, infrastructure, growth corridors etc (reference was made to the Cambridge Futures type approach to options).

There was a general acknowledgement that issues and options is a critical stage for establishing key issues and engaging with stakeholders. However, some respondents felt that some questions asked in consultation documents were anodyne and often resulted in an answer that was easily anticipated or should be taken as a given; for example, most respondents are likely to agree that congestion is a key issue for Cambridge. The question that should be asked is *how* it should be addressed, as this has a direct bearing on policies and spatial options. One respondent noted that it took time to achieve consensus (where possible) and that this needs to be recognised in the overall timetable; and that the issues and options

engagement could have gone further in addressing particular issues, notably air quality.

One respondent observed that a joint issues and options stage on strategic issues, covering both plans would have been useful. Separate consultations on the two plans, which were intended to be closely aligned made it more difficult for some stakeholders to navigate their way through. This should be overcome through preparation of a single joint plan.

Several respondents considered that climate change was not sufficiently well addressed in the plans. This will need to be remedied in the new plan, where it will be important to look at what others are doing, particularly in the light of UK legislation for zero carbon by 2050.

Another respondent mentioned the need to co-ordinate the new plan with other relevant plans, notably the county-wide Minerals and Waste Local Plan. Neither this plan nor the current Local Plans have adequately addressed challenging issues that affect both plans, particularly the relocation of the Cambridge Water Recycling Centre to ensure that comprehensive development of the area can be undertaken. There needs to be a coherent and integrated approach between the Minerals and Waste Plan and the new joint plan.

Do the development strategy and policies respond effectively to the relevant issues?

Some respondents did not feel that this was the case. It was suggested that the relevant issues for the new plan should be considered at a strategic level initially, linked to in-depth stakeholder engagement. This could inform a series of topic-based strategies derived from the vision and objectives (for examples, with regard to climate change, sustainable energy use, transport, research capability). These would then be important drivers behind the spatial options and ultimate spatial strategy included in the plan (one respondent said that topic-based strategy documents could help bridge the gap between the technical evidence and the content of the plan itself; and could inform an iterative narrative to support the rationale for the plan's strategy).

Mention was made in this respect of the Cambridge and South Cambridgeshire Transport Strategy and the county-wide Long Term Transport Strategy, which were considered good examples of focused strategy documents that bridged the gap between the statutory Local Transport Plan (LTP) and the spatial strategy and policies in the Local Plans. More generally, a couple of respondents mentioned the significance of the Mayoral Combined Authority, particularly given its role as the Strategic Highway Authority. It is important in this regard that there is clarity about how and by whom transport strategy work on the new joint plan will be undertaken, particularly as the CA does not yet have a fully formed transport role.

Other respondents felt that there is a clear link between the evidence, strategy, sites and policies. On a specific policy area, mention was made of the need to ensure a more coherent approach to parking policy in the new plan, in the context of meeting overall transport objectives.

It was felt by some that housing numbers were the driving force and that this approach was not sufficiently responsive to some of the issues, particularly how to address affordability and mixed communities in villages. Mention was also made of the restrictions placed on more ambitious locally-based policies by national planning policy and regulations.

Reference was made to an apparent lack of integration in the plans with broader strategic issues, such as the relationship with the wider Cambridge sub-region (the ring of market towns previously defined in the 2003 Structure Plan) and with strategic transport links.

One respondent noted the need to monitor and review implementation of adopted policies to inform a new plan: the real test of a policy's effectiveness is through its application and use for development management purposes.

Is the evidence to support the plans relevant and robust?²

One of the main issues raised, perhaps unsurprisingly, is the approach to housing need. For the adopted plans this was disputed and controversial; some respondents were not clear that the government's standard methodology would overcome all the concerns in this regard, largely because the uplift needed to support the Greater Cambridge economy would remain divisive and controversial. The observation was made that it was difficult for residents and other representative groups to participate effectively in what was a highly technical and acrimonious debate.

Some respondents commented that sometimes it appeared that the evidence had been provided to support the chosen strategy, rather than the strategy being derived from the evidence. For example, it is not clear that the evidence was sufficiently justified or available to support the anticipated use of public transport required for some strategic development locations, ie the modal shift promoted was not realistically achievable given past history.

Rather than move to a sites-based strategy too quickly, it would be preferable to consider spatial options (for example, transport corridors or urban concentration, etc). Similarly, it is important to have topic-based strategies, such as climate change or transport, that have been developed through engagement and which can be used as a central part of the evidence to inform the spatial strategy and relevant policies.

² This and the three topics that follow were qualified during the stakeholder interviews by recognising that the independent Inspectors who examined the plans had found them sound with regard to these matters. However, the purpose of the questions is to see where, in the view of respondents, improvements might be made in developing the new joint plan.

There is recognition by a number of respondents of the burden on the authorities of the amount of evidence required to support the plan and putting it in place relatively quickly. One respondent noted the Inspectors' concerns raised at the hearings about navigating the *amount* of evidence that was produced to support the plans. This raises questions about whether the evidence was proportionate and the need to better manage the outputs of consultants to ensure that they are concise and manageable. Some respondents suggested that the evidence should be more focused and proportionate for the new joint plan. Despite this, respondents also noted that the evidence was generally robust and defensible; substantive deficiencies were only apparent in some of the evidence on housing need, justifying the approach to the development sequence and assessing the effect of development on the Green Belt.

One respondent suggested that there was more technical evidence and work on transport matters than was ideal. This was partly as a result of the authorities needing to respond to omission sites that were put forward by well-resourced objectors. It was noted, however, that this issue largely occurred as a result of the Inspectors allowing considerable debate on these sites, which isn't necessarily the experience at plan examinations elsewhere in the country. There is a challenge, however, for the new plan in deciding how much evidence an Inspector might wish to see, which involves an element of second-guessing, particularly because of the most recently challenging experience.

The authorities need to have the time and opportunity to stand back from the work and get a better understanding and objective view of the evidence and its relationship to the plans. Having a barrister in an advisory role early in the plan process should help with this, as their experience will enable them to help steer and present the evidence in the most effective way.

Another respondent noted the previous challenges related to making provision for travellers is likely to be carried forward into the new plan. This is partly due to inherent problems in assessing need arising from current government guidance, plus the need for a clearer strategy and vision for how to address the issue in Greater Cambridge. This should be a wider, corporate matter for members and senior officers rather than just a purely plan-making issue.

Mention was also made of the need for the plan to reference the requirement for Heritage Impact Assessments to be provided for strategic developments as early as possible.

The infrastructure delivery plan is important. It needs to strike a balance between certainty of what is required, at least at a strategic level, to deliver the strategy and some flexibility, recognising that costs can change.

One respondent noted the challenges of aligning evidence from a range of different partners, which will be more challenging for the new plan due to increased organisational complexity (the Combined Authority, Greater Cambridge Partnership,

Cambridge Ahead, etc). This requires a rigorous approach to programme and project management, and effective engagement between organisations.

Is the topic coverage and content of policies in the plans appropriate and effective?

It is important to learn from practical use of the policies for development management and enforcement purposes. What works and what doesn't, how should policies be changed, which policies should be carried forward into a new plan, and are some policies needed at all? This applies to other organisations that use the plan for development management purposes, notably the county council as highways and education authority and in its other regulatory roles.

Undertaking a rigorous policy review is essential to 'pruning' the existing plans and carrying forward only policies that are used and are effective. As a result, the new plan might be made more concise as well as reordering some sections and achieving a more effective integration of policies/topics (for example, climate change might be a thread that runs through a range of policies or it could be an 'umbrella' section in its own right which could include a number of relevant policy topics, such as green infrastructure, energy use, elements of sustainable transport, etc.). Given that the Councils have declared a climate emergency, it is reasonable to assume that this will be a central policy theme of the new plan.

There is a need for the overall approach to policies to achieve a balance between the national policy requirements of the NPPF and local circumstances.

At least one respondent referred to the need to consider reintroducing selective employment policies to protect land where it will contribute to effective clustering or use by the greatest GVA-generating uses.

Concern was expressed by one respondent that the Cambridge Local Plan did not appear to include a historic environment strategy for the city and, therefore, is not compliant in this regard with the NPPF.

Do the plans include sufficient information to demonstrate the viability and deliverability of the strategy?

Respondents noted the particular challenges associated with providing sufficient evidence on the deliverability of transport infrastructure to support new settlements.

Future-proofing the costs of infrastructure delivery has proved difficult; for example, the costs of delivering public transport outcomes in the A428 corridor appears to have increased significantly during the development of the plans. There is a need, therefore, to have a better understanding of long-term costs and their impact on the viability of strategic development locations. It is also important that partner organisations with funding responsibilities, for example through City Deal funding, are sufficiently well-rehearsed and joined-up with the Councils' narrative to provide a

credible funding picture (one respondent described this as a ‘moveable feast’). One respondent commented that improvements could be made to the approach to assessing viability between the local planning authorities and county council, particularly through earlier engagement on the issue.

However, it was also noted that with so much government funding support for large parts of the development strategy (for example, promoting Waterbeach, City Deal and devolved funding), it is difficult to see what more the authorities could do in this respect. Also, given the extent of the overall shortfall in infrastructure funding that afflicts nearly all plans, this is a common issue which cannot result in all plans being found unsound. However, the Mayor needs to be a more willing partner and engage in supporting enabling infrastructure to deliver growth. More generally, attempts need to be made to break the vicious circle of development coming forward with insufficient certainty about supporting infrastructure. For example, with regard to new utilities upgrades, the need for which often aren’t known until very late in the development process.

It was also important to challenge promoters’ of alternative sites claims that their sites are more viable and deliverable than those in the draft plans, which in many cases was patently incorrect. This issue is likely to arise with the new plan and so the authorities should be prepared.

One respondent supported the 40% affordable housing requirement but questioned its realism given that the requirement is usually challenged on viability grounds. In this regard, the requirement in national policy to assess viability at plan rather than site level is supported. However, it is important that stronger links are made between the overall viability of a strategy and its deliverability.

How might the examination stage of the plan process be made more efficient than for the adopted plans? Could the Councils do anything differently in this regard?

Strong views were expressed by nearly all respondents that the examination stage was too long and had a detrimental effect on the Councils’ ability to adopt and start implementing the plans in an efficient and effective manner. It was recognised in this respect that there is a limited amount the authorities can do where the approach of the individual Inspector largely dictates the progress of the hearings (although it was also noted that the need to produce expanded or updated evidence during the hearings contributed to the delays).

A couple of respondents talked about the importance of reducing, as far as possible, the number of objections to the plan, which would have a beneficial effect at examination. A better narrative and communications strategy supporting the plan, and justification/explanation of the development strategy could have helped in this regard. Another respondent referred to the need for a more concise plan, possibly with ‘daughter’ documents that wouldn’t need to be examined. It is important also to

structure the plan so that it is clearly expressed and presented, with strategic policies differentiated from those that are more local in nature.

Several respondents stressed the importance of early engagement with the Planning Inspectorate (PINS) on the new joint plan. Reference was made to PINS' standard practice some years ago of informal visits to local authorities to discuss the nature of the plan and implications for the examination, *before* the formal examination process begins. This would be undertaken by an Inspector who would not be involved in the examination of the plan but allowed for communication with PINS on broader, practical issues without compromising the independent testing of the plan's soundness.

More generally, some respondents suggested that the Councils need to be assertive in this regard and ensure early engagement with PINS to stress the need for more effective management of the examination process (for example, the programming of hearing sessions) to avoid a repeat of the lengthy process for the now adopted plans. Clearly, the sort of delays that occurred last time have real world implications, for example, in maintaining a five year housing supply, and PINS should be made aware of this.

One respondent commented that better engagement with partners, such as the county council, could help avoid delays. Early briefing on issues and single points of contact should avoid miscommunication or delays to producing evidence.

It would be helpful and more proportionate to inform stakeholders only about the issues they have raised, rather than notify all stakeholders about all the hearing sessions. The hearings should not be an opportunity to revisit some of the principles and fundamentals of the plans, which should have been resolved earlier (this stems from the need for investment of time up front in meaningful engagement).

At least one respondent voiced concerns about the lack of diversity of representation at the plans' hearing sessions. It was felt that residents' groups were under-represented compared to development interests who often seemed to dominate sessions. Reference was made to the importance of the pre-examination meeting to ensure a balanced representation of different interests.

Any other lessons or experience from involvement in the preparation of the adopted plans to comment on?

One respondent noted that the cycle of plan-making can be debilitating for both Council officers and stakeholders. Concerns were expressed about the Councils' capacity and resources to prepare the joint plan across a larger area and the extent of the necessary evidence. Reference was also made to the challenges of managing a complex backdrop of national and sub-national initiatives (such as the Cambridge-Oxford arc) and organisations (including the relationship with the Combined Authority).

A challenge for the new joint plan will be to ensure sufficient flexibility is built-in so that the plan and strategy can respond to external influences, or elements can be reviewed easily. On a positive note, one respondent considered that the county council would be in a better position with regard to preparing and presenting transport evidence as a result of the challenging experience of the last plans. Officers had learnt from this experience, which was evident at the more recent hearing sessions for the Huntingdonshire Local Plan.

It was suggested that the Councils should consider an innovative format for the next plan, utilising technology to provide a virtual and/or interactive plan that is easily accessible in digital formats. More generally, some respondents commented that the plans should be made as accessible to the public as possible, utilising a range of formats (technology and social media has moved on considerably since the adopted plans started their preparation). Also, it needs to be made clear at the beginning what the role and scope of the plan is, both the opportunities and limitations. It is important for the Councils to take people with them through genuine engagement using plain language.

One respondent observed that timescales for preparation of the submission draft plans was too tight; there was not enough time for officers to stand back and take a critical, objective view of how the plans were progressing, produce a good communications strategy and accompanying narrative, etc. It is also important to engage all members of the Councils to ensure that there is a good understanding of and support for the plans. This is particularly important if the administration changes part-way through a plan's preparation.

A representative of a government agency mentioned the opportunity for training-type sessions with the Councils, as part of early engagement, to understand the necessary issues and policy content of the new plan.

One respondent referred to the need for sufficiently responsive governance arrangements to oversee approval of inputs to the Local Plans; particularly with regard to county council governance. It would also have been helpful if there was more interaction between and briefing of county officers by districts. A single point of contact for different workstreams or topics needs to be identified in relevant organisations to ensure effective information management and clear, consistent messages. Discussions with a range of different people in a single organisation doesn't help in this regard.

2.3 Analysis of Stakeholders' Comments and Key Findings

It is important at the outset to note the limitations of this type of research project. With a relatively small number of respondents it is inevitable that not all comments will be representative of a wider view. Indeed, in many cases the nature of the respondents' specific and vested interests mean that their comments on particular issues are singular. Furthermore, the different interests and perspectives represented means that some opposing or contradictory views were expressed across the interviews. Clearly, where such comments are made these are not conducive to drawing broad conclusions.

However, this is a qualitative study and the nature of engagement with individual stakeholders compared to a workshop or other format, enabled an in-depth discussion and some probing of the views expressed. This is helpful to understand some of the issues in greater depth than may be possible through other forms of engagement. It also means that some ideas were articulated that, while only expressed by one or two stakeholders, could nonetheless be helpful to the local authorities in thinking about the approach to the joint Local Plan. Moreover, as noted in the Introduction, the response rate for a survey of this kind is positive, particularly as a good variety of interests took part, representing the general breadth of those invited as a whole.

The principal findings that are drawn from the interviews, in terms of lessons learned and implications for the new Local Plan, focus initially on those areas where there was some consensus between stakeholders. Individual ideas or comments that are of relevance are then considered.

A number of stakeholder workshops on the new joint Local Plan were undertaken by the local authorities recently. These included a brief discussion by stakeholders of the lessons that might be learned from the preparation and content of the adopted plans. Given that these findings are relevant to this project, regard has been had to this aspect of the workshops, and the report of the workshops is referred to where appropriate.

It is also important to recognise that most if not all stakeholders were generally supportive of the approach to and outcomes of the last round of plan-making. In particular, respondents acknowledged the complexity and challenging nature of producing plans for Greater Cambridge, where development pressures and public scrutiny are acute.

The main points where there was some consensus amongst respondents, or provide practical ideas to carry forward into preparation of the new plan, are set out under each of the topic headings in the following section. These are, essentially, the core lessons drawn out by stakeholders which, it is judged, could have a practical effect on the new plan's preparation and content. Each section includes a commentary and analysis, which is then drawn together into overall conclusions.

Overview of the Content and Preparation of the Adopted Plans

- The visions of both plans captured the uniqueness of Greater Cambridge as a place, but this was not so clearly followed through in the strategy or policies.
- Both plans, particularly the Cambridge Local Plan, are quite long and possibly could be more concise.
- The plans did not go far enough in utilising the area's intellectual capital and ability to respond locally to global challenges.
- Climate change and biodiversity were not adequately addressed.
- Supplementary Planning Documents should be used sparingly, with more direction on development proposals in the plans themselves or, where necessary, Area Actions Plans.
- Some policies on the same topic were dispersed; policies should be grouped together to reflect a particular policy approach or topic, eg water management policies.
- Standards required by plan policies provide greater certainty of outcome from new development, such as internal and amenity space standards and mobility standards.

These main points cover the full breadth of the plans' preparation and content. They can, however, be grouped into the following themes: the cohesiveness, structure and length of the plans; policy content and use of separate, supplementary documents; and ensuring effective opportunities for engagement and utilising the outcomes from this, wherever possible.

The authorities may, of course, feel that some or most of these comments (and others below) are not fully justified and that the plans do respond to these issues as effectively as possible, given the circumstances. Furthermore, it may be self-evident that some of the issues raised will need to be addressed in pursuing a new plan; the more fundamental question might be *how* this is to be done in the most effective way. However, it is important to acknowledge the points made at face value, given that they represent the genuinely-held views of a range of stakeholders. As such, even if they reiterate matters which the authorities are already well aware of, they can be considered as helpful in raising awareness of the views of external partners who are likely to be influential in the plan's successful development.

In terms of carrying these matters forward, there will be additional opportunities and challenges arising from the preparation of a joint statutory plan, compared to two separate plans as previously. For example, the vision for the growth of Greater Cambridge will have to be more than the two separate visions stitched together. Furthermore, the wider point made by stakeholders about the need for a cohesive relationship between the vision, strategy and policies is one that needs to be borne in mind.

Thinking of the plan in this holistic way could help to respond to other issues raised by stakeholders. For example, if climate change or natural capital are significant

issues that the authorities are going to address³ then these are likely to be reflected in the vision and/or objectives. Their significance in this regard could then influence both elements of the spatial options that arise to respond to development needs, and the nature and presentation of policies. On this latter point, the coverage of two former plan areas by a single plan provides the opportunity for a rigorous policy review, taking the best and most effective from the two plans while also thinking critically about the nature, grouping and integration of policies as a whole across the new plan.

Early and on-going engagement in plan preparation is a major theme that is raised through the study as a whole. This, together with the other issues raised under this first broad topic, are considered in more detail below.

The Approach to Engagement

- There should be more and earlier stakeholder engagement, before issues and options consultation.
- An important consideration is achieving as much consensus as possible through engagement on the relevant issues and how they might be addressed *before* moving to issues and options consultation.
- Workshops are welcome but these should not be a one-off event, but part of a wider approach to engagement before consultation takes place.
- The manner in which people and organisations are engaged is important.
- Where appropriate, sharing draft policy wording before formal consultation is helpful and enables potential objections to be addressed.

This is the area of plan-making which garnered the most consistent comments across all stakeholders. Respondents were keen to emphasise the difference between engagement and consultation as they saw it with regard to the last round of plan-making. The comments made can be summarised as relating to the amount and timing of engagement, the type of engagement, and the desire for some informal as well as formal consultation.

This was also an issue raised by most groups involved in the recent stakeholder workshops run by the authorities, notably by parish councils, residents' associations and other community groups. While the workshops were welcomed as an example of early engagement, from the comments recorded there appears to be a desire and expectation that more engagement will take place before formal consultation.

There is also a clear desire amongst stakeholders from this study for more engagement before (and possibly after) formal issues and options consultations take

³ Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. In addition, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts.

place, compared to the approach taken for the now adopted plans. On one level, this is unsurprising as it reflects one of the main opportunities for stakeholders to seek to influence the plan; on the other, it also highlights some of the perceived shortcomings of consultation compared to more in-depth stakeholder engagement.

Strong messages about the importance of front-loading plan preparation, with investment in appropriate stakeholder engagement, have been a feature of government and other guidance in recent years. However, this has to be placed in the context of overall plan timetables and imperatives to make progress with a plan review. Much of this now derives from the expectation that plans will be reviewed regularly, not least to ensure an adequate housing supply position, with increasingly punitive penalties for not achieving this.

Clearly, the authorities will be alive to the significant tension in these elements of plan-making: the need for effective stakeholder engagement and the investment of time and other resources this is likely to take, against the need to review the plans in a timely manner. However, the importance of stakeholder engagement should not be under-estimated in terms of its ability to draw out significant issues for the plan and, wherever possible, to achieve a broad(er) consensus of views and to gain stakeholder 'buy-in' that can be beneficial later in the plan process. Any such engagement needs careful planning and resourcing to be most effective, utilising a range of approaches best-suited to the type of stakeholder targeted.

Plan Content – Vision and Objectives

- The visions had limited influence on the outcomes in terms of the strategy and policies.
- National policy concepts and issues that have arisen since the last plans need to feature in the new vision, particularly the idea of natural capital.

There was a general view amongst stakeholders that the vision in each plan is specific to the area and reflects the issues and outcomes that need to be addressed. It is clearly challenging to satisfy all stakeholders that the plans as a whole fully reflect the vision. Different stakeholders may place different emphases on aspects of a vision according to their particular interests. However, the comments above in respect of the overview of the plan by stakeholders are relevant here, particularly thinking about the plan holistically from the outset to try and achieve a cohesive relationship between the vision, strategy and policies.

With regard to the second bullet point above, the authorities will no doubt reflect on the matters they are required by national policy to address in the new plan. However, broad concepts such as climate change and natural capital provide an opportunity to integrate these across a plan as well as, more generally, to organise and integrate policies in an effective manner.

Defining the Issues and Options

- The issues and options consultation was too focused on housing numbers and spatial options in terms of development locations, rather than starting with the nature of the spatial strategy and the different broad options available, for example a dispersed or more compact form of development, recognising the importance of public transport, infrastructure, growth corridors etc.
- Questions should focus on *how* key issues should be addressed, as this has a direct bearing on policies and spatial options.
- There is a need for co-ordination with other relevant plans, notably the county-wide Minerals and Waste Local Plan.

A number of stakeholders felt that the issues and options stage for the adopted plans was not sufficiently broadly-based in terms of considering the options for the type of strategy that would be most appropriate. This point might reasonably be linked to the desire for further early engagement before consultation, which could help to address or further define some of these issues. The last plans were informed by a Sustainable Development Strategy, and one of the possible approaches to the new plan could be similarly to define, including through stakeholder engagement, what are the main elements of sustainable development as it pertains to Greater Cambridge.

A Statement of Common Ground across the two councils' areas might take established facts and areas of consensus as a basis for developing thinking on this, including through stakeholder engagement. For example, it is understood that both Councils have declared a climate emergency and this fact, combined with the statutory duty to take account of climate change in plan preparation, means that this issue would be expected to be a central driver of the spatial strategy and policies of the new plan.

This would also enable some input from stakeholders to the *how* element referred to in the second bullet point. An important overall point in this regard is to achieve an appropriate balance between the amount of time invested in effective stakeholder engagement before issues and options consultation so that the consultation stage is as effective as possible in presenting well-grounded ideas to a wider audience.

In this regard, stakeholder engagement combined with issues and options consultation provides the basis for flushing out some of the hard choices and compromises that the plan may need to make⁴. For example, if transport emissions is one of the main contributors to climate change then a strategy of urban densification and concentration rather than dispersal might be a favourable option. However, there is likely to be a need to balance this against the effects on views of the city's historic centre and potential loss of Green Belt land. Other options may enable a more dispersed strategy if sites are connected to services and facilities by

⁴ Depending on the levels of development that are identified and need to be accommodated in substantive new development locations and sites.

low emissions public transport, thereby reducing any climate change impacts. But this may in turn present potential challenges around viability and deliverability.

It is unclear whether concerns about the relationship of the Local Plans to other plans, particularly the Minerals and Waste Local Plan, are well-founded. However, the wider lesson is to ensure that, at the very least, it is explicit that regard has been had to other relevant plans and strategies, even if they have not subsequently had a direct influence on the Local Plan under preparation.

Plan Content – Development Strategy and Policies

- Relevant issues should be considered at a strategic level initially, linked to in-depth stakeholder engagement. This could inform a series of topic-based strategies derived from the vision and objectives (for example, with regard to climate change, sustainable energy use, transport, research capability). These would then be important drivers behind the spatial options and ultimate spatial strategy included in the plan.
- Topic-based strategy documents could help bridge the gap between the technical evidence and the content of the plan itself; and could inform an iterative narrative to support the rationale for the plan's strategy.
- There is a need for integration with broader strategic issues, such as the relationship with the wider Cambridge sub-region (the ring of market towns previously defined in the 2003 Structure Plan) and with strategic transport links.
- Monitoring and review of implementation of adopted policies is important as the real test of a policy's effectiveness is through its application and use for development management purposes.
- Undertaking a rigorous policy review is essential to 'pruning' the existing plans and carrying forward only policies that are used and are effective. As a result, the plans might be made more concise as well as reordering some sections and achieving a more effective integration of policies/topics.
- There is a need for the overall approach to policies to achieve a balance between the national policy requirements of the NPPF and local circumstances.

The first two bullet points further reflect on stakeholders' experience, based on the last plans, about how the strategy and policies might be developed. Topic-based strategy documents were used effectively for the last local plans, particularly with regard to the sub-regional transport strategy, and the idea is that this approach could be expanded to cover other areas.

The point made about the need for wider integration with the former Cambridge sub-region plays into the role of the Combined Authority and the Mayor's ambitions for a strategic spatial strategy. The transport corridor studies commissioned by the CA are likely to have a bearing here as well as other initiatives, such as the market town

strategies. The Duty to Co-operate with neighbouring authorities also provides an important driver for these matters.

A theme that runs through a number of the issues raised by stakeholders, and also from the recent workshops, is the need for effective policy review. A rigorous and comprehensive review of the use and effectiveness of the policies from both plans would appear to be a common sense pre-requisite for deciding whether policies are carried forward to the new Local Plan.

Supporting Evidence

- Housing need evidence was disputed and controversial; it is not clear that the government's standard methodology will overcome all the concerns in this regard.
- It was difficult for residents and other representative groups to participate effectively in what was a highly technical and acrimonious debate.
- It is important to have topic-based strategies, such as climate change or transport, that have been developed through engagement and which can be used as a central part of the evidence to inform the spatial strategy and relevant policies.
- If possible, the evidence should be more focused and proportionate, with a need to better manage the outputs of consultants to ensure that they are concise and manageable.
- The authorities need to have the time and opportunity to stand back from the work and get a better understanding and objective view of the evidence and its relationship to the plans. Having a barrister in an advisory role early in the plan process should help.
- Previous challenges related to making provision for travellers are likely to be carried forward into the new plan. This is partly due to inherent problems in current government guidance, plus the need for a clearer strategy and vision for how to address the issue in Greater Cambridge.
- The infrastructure delivery plan needs to strike a balance between certainty of what is required, at least at a strategic level, to deliver the strategy and some flexibility, recognising that costs can change.
- Aligning evidence from a range of different partners will be challenging due to increased organisational complexity. This requires a rigorous approach to programme and project management, and effective engagement between organisations.

Concerns remain for some stakeholders, both through this project and at the workshops, that the prolonged and challenging housing debate at the last examination will be repeated. Confidence in the government's standard methodology is limited in this regard. With little experience of the new method being tested in practice, it remains to be seen whether these concerns will be realised and, therefore, there are limited lessons that can be drawn from this matter. Also, it is

likely that the approach to the debate will depend to a great extent on the appointed Inspector(s).

More generally, there is a recognition that the last plans had significant amounts of supporting evidence and it is not clear that this could reasonably be seen as proportionate. The lessons in this regard relate to the need for effective management of consultants involved in producing evidence, the value of having legal advice earlier in the process and the need for clarity from the outset about the role of partner organisations in providing evidence to inform and support the plan.

Reference was also made to the challenges presented by the approach to travellers in the plan. Part of this stemmed from the inherent problems in government guidance, but also from the lack of a clear strategy or narrative to explain the Councils' approach to this issue. Consideration needs to be given to whether and how this issue can be addressed more effectively in the new plan.

Demonstrating Deliverability and Viability

- There is a need to have a better understanding of long-term costs and their impact on viability of strategic development locations.
- Partner organisations with funding responsibilities, for example through City Deal funding, need to be sufficiently well-rehearsed and joined-up with the Councils' narrative to provide a credible funding picture.
- Improvements could be made to the approach to assessing viability between the local planning authorities and county council, particularly through earlier engagement on the issue.

Demonstrating soundness in plan-making in relation to these matters has been difficult for many authorities. There appears to be no consistent benchmark for what is proportionate evidence in this regard. As one respondent noted, the extent to which the Inspectors allowed detailed consideration of omission sites resulted in greater challenges with regard to this issue. This might not occur in the same way again, although the authorities need to take the experience of the last round of plan-making and use it as effectively as possible with regard to the new plan. This includes ensuring that partner organisations involved in funding co-ordinate their evidence and input to the plan-making process and particularly the hearing sessions.

The Examination

- The examination stage was too long and had a detrimental effect on the Councils' ability to adopt and start implementing the plans in an efficient and effective manner.
- It is important to reduce, as far as possible, the number of objections to the plan as this would have a beneficial effect at examination. A better narrative

and communications strategy supporting the plan, and justification/explanation of the development strategy could help.

- There needs to be early engagement with the Planning Inspectorate (PINS) on the new joint plan. The Councils need to be assertive in this regard and ensure early engagement with PINS to stress the need for more effective management of the examination process (for example, the programming of hearing sessions).
- Better engagement with partners could help avoid delays. Early briefing on issues and single points of contact should avoid miscommunication or delays to producing evidence.
- There was a lack of diversity of representation at the plans' hearing sessions, with residents' groups under-represented compared to development interests who often seemed to dominate sessions.

There is consensus amongst stakeholders that the examination phase was far too long and onerous for all parties. Participants in the recent workshops concurred with this view. Stakeholders recognised some of the limitations in the Councils' ability to shape the examination and hearing sessions, as this is largely for the appointed Inspector(s), although better engagement throughout the plan process could help to reduce the number of objections to the plan. There is also a strong view that the authorities should seek early engagement with PINS, if possible, to ensure that the Inspectorate is at least aware of the need to avoid similar issues relating to the programming and overall length of the hearing sessions.

Ensuring a proportionate approach to the evidence to support the plan, early engagement of a barrister to provide advice, a communications strategy and strong narrative around what the plan is seeking to achieve, as well as ensuring partner organisations are well-rehearsed and consistent in their approach, should all help.

Other Issues

- An innovative format for the next plan should be considered, utilising technology to provide a virtual and/or interactive plan that is easily accessible in digital formats. More generally, plans should be made as accessible to the public as possible, utilising a range of formats.
- Timescales for preparation of the submission draft plans was too tight; there was not enough time for officers to stand back and take a critical, objective view of how the plans were progressing, produce a good communications strategy and accompanying narrative, etc.
- It is important to engage all members of the Councils to ensure that there is a good understanding of and support for the plans.
- It would have been helpful if there was more interaction between and briefing of county officers by districts.

- A single point of contact for different workstreams or topics needs to be identified in relevant organisations to ensure effective information management and clear, consistent messages.

Stakeholders participating in this project and those involved in the workshops were keen to see the plans available in innovative and accessible formats, although cost must be a consideration in this regard. The question of overall timescales for the plan's preparation is critical and relates in part to the extent of stakeholder engagement and issues and options consultation, as well as the number of representations received during the various consultation stages.

It is likely that, based on previous experience, the Councils will also have substantive concerns about the length of the examination, although it is to be hoped that the same exceptional experience will not occur again. The more general point here is to ensure that the plan is managed effectively as a project with the purpose and timescale for each stage carefully mapped out. Similarly, on a practical level, organisational complexity can lead to challenges for this sort of project so it is important that there is clarity of roles and main points of contact for specific issues.

2.4 Conclusions

This is a qualitative study that has elicited a range of views from different stakeholders on their experience of the last round of Greater Cambridge plan-making. Unsurprisingly, some views narrowly reflect the respondent's particular interest and some contradict the views of other stakeholders. Nonetheless, a range of issues and lessons have emerged which are likely to be of significance for the new plan. The local authorities will be aware of many or most of these, but they are helpful in confirming the key issues that stakeholders consider will have a bearing on preparation of the new plan.

Consensus emerged from this project and the recent workshops around a number of issues. The **extent and type of engagement** is important to many stakeholders, particularly where, it is felt, this can have a positive bearing on defining the key issues and options. In their view, this should occur before more formal consultation and should utilise a range of formats, reflecting the needs of different stakeholders.

Consultation questions should focus on *how* key issues should be addressed, as this has a direct bearing on spatial and policy options, rather than questions where the answer may reasonably be considered to be self-evident.

Topic-based strategy documents could help bridge the gap between the technical evidence and the content of the plan itself; and could inform an iterative narrative to support the rationale for the plan's strategy.

The **length of the plan** and the **extent of supporting evidence** should be more proportionate. These ambitions should be informed by a rigorous **review of plan policies** to ensure that only useful and effective policies are carried forward.

The plan's **policy content** should include a central focus on climate change and biodiversity, while travellers' accommodation needs remains a challenging issue that requires a strategic, corporate approach.

Ensuring **effective information management** and **co-ordination of evidence** production and presentation is critical, particularly given increased organisational complexity. The role of the Combined Authority needs to be clarified in this regard.

Finally, with regard to **the examination**, it is important to attempt to reduce the number of objections through a clearer approach to engagement with stakeholders throughout the plan preparation process. In addition, a proactive and assertive approach should be taken through early engagement with the Planning Inspectorate, to ensure key messages and lessons from the last, lengthy examination are conveyed and heard.

3. Good Practice

3.1 Introduction

An intentional distinction is made in this section between ‘good’ as opposed to ‘best’ practice. As one stakeholder commented, in his experience there are no Local Plans that have not faced some challenges during their route to adoption. Consequently, there are no obvious examples of recent Local Plans, taken as a whole, that can be highlighted as ‘best practice’ in plan-making.

Furthermore, discussion for this project with practitioners and professional bodies has elicited very few specific examples of particularly effective practice in plan-making. This is likely to be, in part, because of reluctance to draw attention to any particular plans due to concerns that these, in whole or part, might be copied slavishly or that they do not live up to expectations of what good practice is envisaged to be by different practitioners.

This reluctance or inability to point to examples of good practice in plan-making is also likely to stem from the shifting backdrop of national policy and guidance in recent years. Some of the national policy requirements introduced since 2012 have proved challenging in practice. These include the requirement to assess objectively the level of housing need and the duty to co-operate with neighbouring authorities and other bodies. A number of plans have been found unsound as a result of these requirements, while others have only just made it over what is generally considered to be a ‘high bar’ for plan-making and soundness.

Against a backdrop of these challenging requirements for Local Plans it is perhaps unsurprising that it is difficult to find recent examples of good practice.

Since the radical reduction of topic-based national guidance, from some 7000 pages to just 50 in the form of the National Planning Policy Framework, the amount of national guidance on plan-making, amongst other issues, has diminished significantly.

The national guidance that is now available, in the Plan-Making section of the Planning Practice Guidance, is limited in its content and scope compared to previous documents such as Planning Practice Guidance Note (PPG) and Planning Policy Statement (PPS) 12: *Local Plans*. Moreover, in the past government actively commissioned companion or supplementary guidance documents to PPGs and PPSs that included case studies and which, therefore, effectively amounted to good practice at a national level advocated by government⁵.

Consequently, given this paucity of good practice guidance and practical examples of Local Plans, this section of the report is of necessity relatively limited in its scope. It focuses initially on guidance on good plan-making issued since the publication of

⁵ For example, *Making Plans, a Practical Guide: Good Practice in Plan Preparation and Management of the Development Plan Process*. Office of the Deputy Prime Minister, 2002.

the NPPF, which is considered to be of some relevance to plans being prepared now. It then goes on to consider any examples of practical significance for the Greater Cambridge Local Plan in recently adopted plans or plans currently in preparation.

3.2 Good Practice Guidance

National planning organisations, such as the Royal Town Planning Institute (RTPI), Town and Country Planning Association (TCPA) and Planning Officers' Society (POS), have not produced any comprehensive good practice guidance on plan-making of note since 2012 when the first version of the National Planning Policy Framework was published.

The TCPA, however, regularly publishes good practice guidance and other practical guides on a range of planning topics, a number of which have a bearing on aspects of good plan-making. For example, its series of 'TCPA Practical Guides' includes *Guide 11, People Planning and Power*⁶. This is described as a practical guide which provides an overview of the policy requirements, background principles and practices for securing effective public participation.

The most comprehensive and recent guidance, which is most likely to be of relevance is the Planning Advisory Service's (PAS) *Good Plan Making Guide, Plan Making Principles for Practitioners*⁷. This was published in September 2014 and, therefore, post-dates publication of the National Planning Policy Framework. While updates to the NPPF have been published since, these do not fundamentally change the principles included in the PAS guidance.

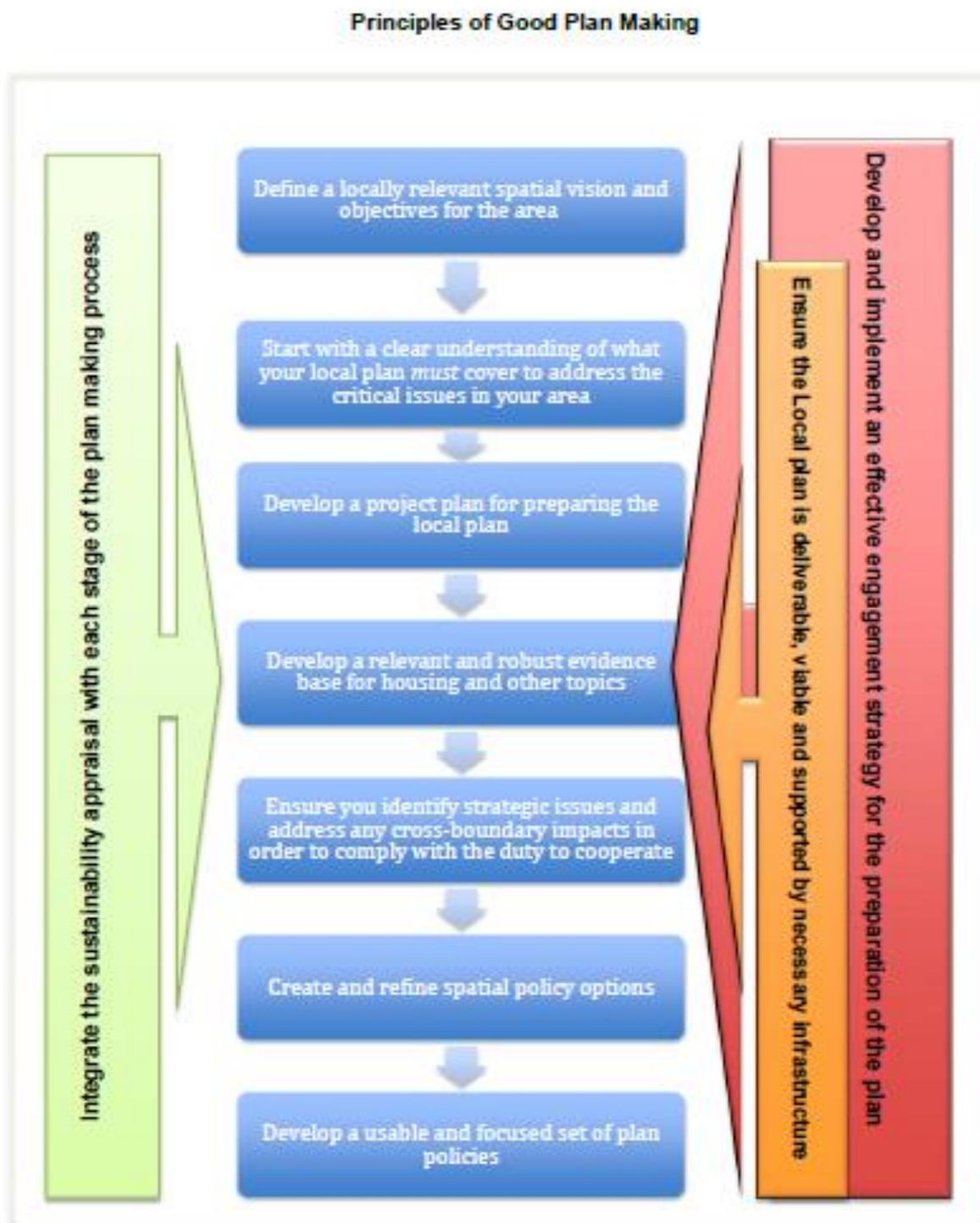
The purpose of the guidance is to identify key principles for successful plan making and to highlight some of the core tasks that will need to be undertaken to develop a Local Plan. The guidance is based on ten good practice principles, which reflect the requirements of the NPPF and the soundness tests against which a plan is assessed at examination. Separate sections of the guidance cover each of the principles, which are as follows:

- Define a locally relevant spatial vision and objectives for the area.
- Start with a clear understanding of what your local plan must cover to address the critical issues in your area.
- Develop a realistic project plan for preparing the local plan.
- Integrate the sustainability appraisal with each stage of the plan making process.
- Develop and implement an effective engagement strategy for the preparation of the plan.
- Develop a relevant and robust evidence base for housing and other topics.
- Ensure you identify strategic issues and address any cross-boundary impacts. This will help you demonstrate how you have met the duty to cooperate.
- Create and refine realistic spatial policy options.
- Develop a usable and focused set of plan policies.
- Ensure the local plan is deliverable, viable and supported by necessary infrastructure.

⁶ TCPA Practice Guide 11: <https://www.tcpa.org.uk/tcpa-practical-guides-guide-11-people-planning-and-power>

⁷ PAS Good Plan Making Guide: <https://www.local.gov.uk/sites/default/files/documents/entire-guide-4c0.pdf>

The guidance advises that in practice the tasks associated with each principle will often be undertaken in parallel and iteratively as illustrated in the diagram below.



These principles cover a number of the issues and lessons raised by stakeholders through this project and, therefore, the Councils may find it helpful to (re)consider the guidance in respect of the new Local Plan.

Other noteworthy documents produced in recent years include the report of the Local Plans Expert Group, published in March 2016⁸. This was commissioned by the government with a remit to consider how local plan making can be made more efficient and effective. As such, it does not deal with good practice directly but principally makes recommendations for changes to the plan-making system, some of which have been incorporated into revised versions of the NPPF or legislation.

One of its proposals in this regard resulted from the finding that local communities feel excluded from the plan-making process. One response was to recommend that the first stage of engagement (Regulation 18) should principally enable the community to express their views about their vision for the area and their views on all relevant issues. It was considered by the expert group that this and other changes would substantially improve community engagement, whilst speeding up plan-making.

This recommendation, which was implemented by government, does not chime fully with the experience of stakeholders from this project. Many made a distinction between consultation and engagement, with a clear view of the benefits of early engagement rather than one-off consultation as recommended and implemented through the report. This does, as recognised by the expert group, add to the timescale of plan-making, but clearly there is a balance to be achieved.

Other areas of interest and relevance are that the report's appendices draw together a list of requirements for a Local Plan and a list of the necessary evidence base, to assist plan makers. The report identifies the scope for a proportionate approach to both; and also provides guidance and recommendations for the style of Local Plans. All these matters were raised by stakeholders who participated in this project and, therefore, are worth further consideration.

The final publication that has some bearing on the experiences and lessons found from this project is the letter published by the then Secretary of State for Housing, Communities and Local Government in June 2019 to the Chief Executive of the Planning Inspectorate⁹. This concerns, amongst other matters, the role of the Inspectorate in examining Local Plans. It includes a clear message that the Secretary of State expects Inspectors to be pragmatic in getting plans in place that, in line with paragraph 35 of the NPPF, represent a sound plan and that Inspectors should be consistent in how they deal with different authorities. This is helpful with regard to the examination of the new joint plan, particularly set against the experience from the last round of plan-making.

⁸ LPEG Report: <http://lpeg.org/wp-content/uploads/2016/02/Local-plans-report-to-governement.pdf>

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/813180/Local_Plan_examinations_letter_to_the_Chief_Executive_of_the_Planning_Inspectorate.pdf

3.3 Examples of Good Practice in Plan-Making

The profile of joint planning nationally is currently focused on sub-regional, strategic scale plans, typically involving four or more local authorities working together. These are vehicles for addressing geographies and issues that in the past would have been dealt with through statutory strategic plans (structure plans and the sub-regional chapters of regional spatial strategies). Current examples include joint plans in the West of England (four authorities focused on Greater Bristol), south Essex (six authorities in the Essex Thames Gateway) and south-west Hertfordshire (five authorities).

Some groups of authorities are working on non-statutory spatial strategies to provide high-level guidance for the preparation of Local Plans. However, the particular examples referred to above all involve statutory joint plans and, therefore, in terms of the preparation process and the need to address some issues at a larger than single plan scale, they bear some similarities to the joint Greater Cambridge Plan. However, there are good reasons why these joint plans do not represent examples of effective practice that provide useful lessons for Greater Cambridge.

Firstly, the scale and ambition of these plans has often led to a lack of visible progress and outputs, certainly in the case of Essex and Hertfordshire. Furthermore, the current local plans system does not lend itself particularly well to joint plans on this scale, which are ultimately filling a vacuum left by former strategic-scale statutory plans.

The most advanced plan is that for Greater Bristol, which has been submitted for examination with initial hearing sessions taking place earlier this year. However, serious concerns have been expressed by the examining Inspectors about the joint plan's soundness. This is largely because it is not clear that the authorities considered properly the reasonable alternatives and options that might exist to accommodate development across the large area covered by the plan. Instead, it appears that the approach taken is to stitch together the four separate administrative areas on the basis that they each accommodate a broadly equitable amount of development. Some commentators have noted that this is to avoid difficult political decisions about the implications of Bristol's growth for the green belt surrounding the city.

While this is clearly not good practice, more the opposite, it will be instructive for the Greater Cambridge authorities to be aware of the reasons for the Inspectors' concerns as there are likely to be broader lessons for joint planning that are likely to be of relevance.

There are examples of statutory joint plans on a smaller scale, involving fewer authorities that have been found sound and subsequently adopted. As such, while it is not possible in the scope of this project to point to specific issues or details of their preparation and/or content as good practice, it is probably worth the Greater Cambridge authorities investigating them further.

The first is the Central Lincolnshire Local Plan, adopted in April 2017¹⁰. This is a joint statutory plan involving three local authorities and covering the administrative areas of the City of Lincoln, West Lindsey and North Kesteven. Overarching governance is provided by the Central Lincolnshire Joint Strategic Planning Committee. The plan is currently subject of an early review.

The adopted plan follows a largely standard format, with a settlement hierarchy and development needs accommodated in accordance with this. Development is focused on the city of Lincoln, then surrounding market towns and villages. Therefore, the geography of the wider area is not dissimilar to Greater Cambridge, although the development pressures and issues are clearly not the same. However, the plan does make provision for significant growth, with some 37,000 new homes to be accommodated over the plan period.

The other example is the Greater Norwich Local Plan, currently in preparation (although this follows the earlier adopted Greater Norwich Joint Core Strategy). This also involves three authorities – Broadland District Council, Norwich City Council and South Norfolk Council – working together to produce a joint statutory Local Plan. Governance of the joint plan is provided by the Greater Norwich Development Partnership Board. Work on the plan started in mid-2106 with adoption anticipated in September 2021.

Again, the geography is similar with the focus of growth on the city of Norwich surrounded by a largely rural hinterland with some market towns and a range of different sized villages. Information about the evidence base for the plan, the approach to consultation and growth options is provided on the joint plan website¹¹.

These two plans provide perhaps the best recent comparable examples to the Greater Cambridge situation in terms of preparing a joint plan. The Cambridge authorities may, therefore, find it helpful to compare experiences and consider if there are lessons to take from preparation of either or both plans. This could include speaking to officers involved in the preparation of the plans.

As noted, the scope of this project does not allow for a wide-ranging examination of possible good practice in terms of individual topics in Local Plans. Indeed, the lack of any obvious recommendations of good practice from practitioners, professional bodies and government means that this would involve a wide-ranging search.

There are, however, a couple of examples that are worth examining because they have a bearing on significant issues raised by stakeholders for this project. The first concerns the recent RTP1 award-winning project undertaken by the Lake District National Park Authority, *Attracting a high level of participation for the Lake District National Park local plan consultation*¹². The award stemmed from the extent of

¹⁰ Central Lincolnshire Local Plan: <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan/>

¹¹ Greater Norwich Local Plan: <http://www.greaternorwichgrowth.org.uk/planning/greater-norwich-local-plan/>

¹² Lake District National Park Authority: <https://www.lakedistrict.gov.uk/planning/local-plan-review/local-plan-past-consultation>

engagement on the issues to inform the plan. The lessons learned include the need to invest time in engagement before formal consultation takes place, the use of technology in consultation and effective use of a communications strategy or plan. These are all matters raised by stakeholders through this project and, therefore, the approach taken by the National Park Authority is worth further consideration by the Greater Cambridge authorities.

Given that the authorities, in common with others in the UK, have declared a climate emergency, climate change is likely to be central to the new plan. In this regard one stakeholder referred to the value of considering an approach like the Leeds Climate Commission¹³. The commission has mapped out what the city council and partners need to do in five year bands lifetime to address climate change to meet the 2050 requirement.

These sort of practical considerations and approach to a high profile subject for the joint plan appears to reflect the suggestion of some stakeholders for topic-based strategies that can inform the development of issues and options, which in turn will shape the development strategy and plan policies.

¹³ Leeds Climate Commission: <https://www.leedsclimate.org.uk/about-leeds-climate-commission>

3.4 Conclusions

Examples of good practice in plan-making are not easily to be found.

National policy and practical guidance to support plan-making, and other aspects of the planning system, underwent a radical shift in 2012 with replacement of topic-based policy guidance by a single, shorter document, the National Planning Policy Framework. At the same time, government's former role in providing practical planning guidance, including case studies, diminished.

The Planning Advisory Service, as a government-funded body, has filled this breach to some extent. Its 2014 guidance on good plan-making remains the most comprehensive recent guidance of its type. The principles it espouses are valuable as a checklist against which to measure effective plan preparation and outcomes. A number of these principles chime with the experience and lessons referred to by stakeholders engaged in this project.

Other aspects of good plan-making can be found in topic-based practical guides published by the Town and Country Planning Association.

The report of the Local Plans Expert Group to government similarly provides guidance on proportionate approaches to Local Plan evidence and the style and content of plans.

Much of the interest and focus for joint planning nationally is on strategic-scale plans, typically involving at least four local authorities. Despite their larger scale than the Greater Cambridge Local Plan, these plans might still throw up some relevant good practice. However, on closer analysis this type of plan does not provide a good basis for learning lessons: they have either made limited progress, or in the one case where substantive progress has been made, the plan has fundamental soundness issues. Despite there being no obvious examples of good practice here, lessons of how to avoid the same outcome for a joint plan can be drawn from this unfortunate experience.

More positive experiences of joint planning on a scale and geography closer to that of Greater Cambridge can be found in the joint plans for Central Lincolnshire and Greater Norwich. Both of these groupings of three authorities have adopted and are now reviewing statutory joint plans. As such, both areas may have valuable experience and lessons to share.

Finally, the award-winning approach to stakeholder and public engagement in plan-making in the Lake District, and the Leeds Climate Commission provide examples of effective practice covering two topics that were highlighted by stakeholders as being of particular significance for the Greater Cambridge Local Plan.

4. Conclusions

This qualitative research project has provided a range of stakeholders' views on their experience of recent plan-making in Greater Cambridge. It has also examined good practice, such as it exists, in national plan-making guidance and practical examples of joint planning elsewhere in England.

All stakeholders participating in the project acknowledge the challenges of producing the now adopted plans, not least because of the extent of development pressures and public scrutiny; and all have identified strengths and challenges where lessons can be learned for the preparation and content of the new joint Greater Cambridge Local Plan.

It is inevitable in a project of this type that some views will be specific to a stakeholder's role and interests and, therefore, are not more widely representative. However, it has been possible to identify a number of areas where there is some broad consensus amongst stakeholders, which is also borne out by comments from the recent stakeholder workshops. It is these areas which, it is suggested, should be the main point of focus for the authorities in considering the lessons learned from the last round of plan-making and the implications for the Greater Cambridge Local Plan.

These areas include:

- the extent and type of stakeholder engagement before public consultation, particularly as this can have a positive bearing on defining the key issues and options for the plan;
- the length of the plan and the extent of supporting evidence, which should be kept proportionate, including through a rigorous review of plan policies;
- the plan's policy content should include a central focus on climate change and biodiversity, while travellers' accommodation needs remains a challenging issue;
- ensuring effective information management and co-ordination of evidence production and presentation, particularly given increased organisational complexity; and
- the examination, where it is important to attempt to reduce the number of objections through a clearer approach to on-going engagement with stakeholders, while a proactive and assertive approach should be taken through early engagement with the Planning Inspectorate.

It is noted in the introduction to this report that one of the main reasons for scrutinising the last round of plan-making is to gain a better understanding of why the process lasted seven years, with more than half of this taken up by the post-submission examination stage. Some stakeholders have suggested that this is largely down to the approach of the Inspectors who examined the plans, while others point to the nature of the strategy, the extent of objections and the weight of supporting evidence.

An important question for the authorities this time around is, despite the timetabling pressures already in place, could investment of more time at the front end of the overall plan process reap some benefits in the latter stages, particularly at examination.

Annexe A: Stakeholders invited to participate in a structured interview and discussion

Previous planning portfolio holder/leader - Cambridge City Council (CC)*

Previous planning portfolio holder/leader - South Cambridgeshire District Council (SCDC)

Executive Councillor for Planning Policy and Open Spaces – CC*

Lead Cabinet member for Planning – SCDC*

Former Local Plan Manager – Cambridge*

Local Plan officers - Cambridge

Local Plan Manager – SCDC*

Local Plan officers - SCDC

Development Management Officers

Cambridgeshire County Council*

GCP

Local Plan Examination Barrister*

Environment Agency*

Natural England

Historic England*

Highways England

Anglian Water

Cambridge Water

Cambridge Past, Present and Future*

FECRA

Cambridge Cycling Campaign*

Cam Conservators

Visit Cambridge

University of Cambridge*

Anglia Ruskin University

Annexe B: Greater Cambridge Local Plan: Project Brief

Greater Cambridge Local Plan: Lessons Learned and Good Practice

1.0 Purpose

- 1.1 In 2018 Cambridge City Council and South Cambridgeshire District Council adopted separate but closely aligned Local Plans and are now embarking on the preparation of a new joint plan, the Greater Cambridge Local Plan. This point in the plan review cycle presents an opportunity to reflect on the experience of preparing the now adopted plans, to inform the approach to the new joint Local Plan.
- 1.2 The 'lessons learned' element of this project will focus on identifying which areas of the plans' preparation went well and those areas where improvements might be made (recognising that some areas will be more in the Councils' control than others). The ultimate purpose of the project, therefore, is to understand in which areas, and how, improvements might be made to the approach to plan-making - to create greater certainty in terms of outcomes, delivering the plan in a timely manner and achieving more effective use of resources.
- 1.3 The findings will be benchmarked against best practice drawn from current national guidance and, where possible, examples of plans prepared elsewhere in England. Together with the 'lessons learned' element and work focusing on the development strategy, this will contribute to a proactive as well as a reflective approach to preparing the new Local Plan.

2.0 Background

- 2.1 Preparation of the Cambridge City Local Plan 2018 and South Cambridgeshire Local Plan 2018 took place between 2011 and 2014. This included evidence gathering, an issues and options consultation, drafting the full plans and consultation on the proposed submission Local Plans. The plans were submitted to the Secretary of State for examination in March 2014. In August 2018, the Inspectors conducting the examination issued their final report and concluded that the plans are sound, subject to a number of main modifications. The Cambridge Local Plan was adopted in October 2018 and the South Cambridgeshire Local Plan in September 2018.
- 2.2 Clearly, one of the fundamental drivers for scrutinising the last round of plan-making is to gain a better understanding of why the process lasted seven years. There are a range of consequences which arise from the length of time it took to prepare the plans: additional public expense and resource demand, achieving an up-to-date and adequate housing land supply, updating other important areas of planning policy and, ultimately, creating greater certainty for all stakeholders about the future growth of the area.
- 2.3 The longest phase of the overall process was from submission to adoption, over four years. Much of this was taken up by the hearing sessions and the Inspectors' reporting time. These matters were, and are likely to remain in future, largely outside

the control of the local planning authorities. However, it is important for the authorities to scrutinise critically and objectively the plan-making approach and process as a whole to understand the influence of different issues on intended outcomes and timescales.

3.0 Issues

- 3.1 A number of themes have been identified by officers involved in preparing the adopted Local Plans. These provide a valuable basis for structuring the approach to understanding the influence and importance of particular issues within these themes for the plans' preparation.
- 3.2 At this stage the identified themes are not an exhaustive list; others may arise during the course of the project. However, they are an important starting point in thinking about the areas of plan-making that are likely to be significant for the Greater Cambridge Local Plan. These themes are:
- the scope, content and structure of the Local Plans;
 - programme and project management;
 - governance;
 - the evidence base;
 - the approach to issues and options;
 - consultation and stakeholder engagement;
 - policy development; and
 - examination of the plans.
- 3.3 Since the current plans were adopted the national policy context for plan-making has been updated. The National Planning Policy Framework (the Framework) has been republished twice with a number of changes that have a bearing on the approach to preparing plans. These include important elements of the evidence base, most notably the introduction of a standard method for calculating housing need; and structural issues with regard to the content of Local Plans, particularly the distinction between strategic and local policies. In addition, more detailed guidance has been published through updated sections of the Planning Practice Guidance.
- 3.4 It will be important to consider the interaction of this updated policy and guidance with the lessons learned from the last round of plan-making. It may be that some of the changes to the national context will help address issues identified through this project.
- 3.5 More generally, since the most recent plans were developed and submitted for examination in 2014, there has been considerable change to the context for the new plan's development. This includes at the national, sub-national and local levels, in terms of new political drivers, new strategic initiatives and policy changes, and structural and organisational change. These influence of these matters will need to be considered carefully with regard to the approach to the new Local Plan.

4.0 Approach

- 4.1 The most direct approach to understanding the issues and lessons arising from preparation of the adopted plans is to engage with those involved in their development and with a stake in the outcome. This will provide a comprehensive and informed appreciation of those areas of the process that are viewed positively and those less so. Particular areas of focus can be drawn from the analysis of the collated views, which should be valuable to inform the development and progression of the Greater Cambridge Local Plan.
- 4.2 The proposed method for engagement with relevant stakeholders is a structured discussion, either in groups or more likely on a one-to-one basis. A framework and questions to guide the discussion will be developed around the themes identified in paragraph 3.2 above. This will be tailored according to the role and interests of the particular stakeholder.
- 4.3 The stakeholders who should be involved in this central part of the project will be agreed with Council officers who are overseeing the project. However, for the purposes of this Brief, an initial idea of those who could be asked to participate is as follows:
- Members of both Councils, particularly the relevant Portfolio Holders for planning at the time of the plans' preparation and now;
 - Local Plan Team Leaders and Officers;
 - Development Management Officers (to understand the outcomes of policy development against the intended objectives);
 - relevant County Council Officers;
 - those engaged in advising the Councils, particularly the relevant Barrister;
 - national agencies with an interest in development and infrastructure, particularly the Environment Agency, Highways England, Anglian and Cambridge Water, Natural England;
 - local organisations such as Cambridge Past, Present and Future and other identified community groups; and
 - possibly development interests, particularly through agents that are active in the Greater Cambridge Area.
- 1.4 Collating best practice will largely be a desk-based exercise, drawing on the latest published guidance from government, other national agencies (for example, the Planning Inspectorate and the Planning Advisory Service) and professional bodies (the Royal Town Planning Institute, the Town and Country Planning Association and the Planning Officers' Society). Engagement will also take place with the consultant's contacts in the planning profession to consider any examples of best practice in plan-making that might exist in other parts of the country.

5.0 Outputs

- 5.1 The main output will be a written report setting out the results of the stakeholder engagement and gathering of best practice. This will identify the main issues arising from these two main aspects of the work, will analyse their relevance to the development of the Greater Cambridge Plan, and will draw clear conclusions and recommendations to inform development of the new plan.

6.0 Timescale

- 6.1 This Brief and particularly the approach to the project, including which stakeholders to engage, will be considered by Council officers in the first half of June. Once approved, the intention is that, subject to practical considerations of access and availability, the bulk of the stakeholder engagement will be undertaken during June and the first half of July. Subject to completion of the engagement with stakeholders, the final draft report will be completed by mid/late August.