

**Item**

**UPDATE ON WORK FOR NEW BUILD HOUSING PROGRAMME 2022-2032**

**To:**

Councillor Richard Johnson, Executive Councillor for Housing  
Housing Scrutiny Committee 19/01/2020

**Report by:**

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**Wards affected:**

All

**1. Executive Summary**

- 1.1 This report provides an update on the new build housing programme for 2022-2032.
- 1.2 This report provides an update on work undertaken since the September 2020 committee and focuses specifically on sustainable housing standards and the delivery routes available to the Council.
- 1.3 A road map towards Net Zero Carbon has been developed with a commitment, subject to technical and financial constraints, for new build Council homes to attain Net Zero Carbon from 2030; and to Passivhaus from 2021. This report sets out the seven principles to be applied to all new developments.
- 1.4 The Council has utilised several delivery routes for new housing since it was able to develop again. Over recent years the Cambridge investment partnership (CIP) has proved to be an effective delivery

model. This alongside securing S106 opportunities, traditional tendering and being open to new opportunities will be required to deliver a programme at the scale proposed.

- 1.5 This report reviews options for delivery of the 1,000 new Council rented housing programme that was agreed by Exec Cllr at Housing Scrutiny Committee in September 2020. It considers the mechanisms that the Council has used to deliver new housing – most recently in the ‘devolution 500’ programme.
- 1.6 It proposes that the major element in the delivery should be provided by the Cambridge Investment Partnership (CIP) at least for the duration of the agreement, subject to regular reporting and review. Subsidiary contributions could be made through the procurement of Design and Build contracts, S106 agreements and joint ventures / development agreements with other partners. It should be noted that each scheme will continue to require decision by the Executive Councillor following a report to the Housing Scrutiny Committee before proceeding.
- 1.7 The Cambridge Investment Partnership (CIP) is a twenty-year agreement from 2017. It has the following benefits:
  - delivering at scale and pace.
  - ongoing learning and development particularly in relation to sustainability.
  - early scheme appraisal and development to bring forward new opportunities.
  - commercial input to site-finding and mixed tenure developments
  - adding project management capacity to the in-house capacity in the HDA.
  - Value for money and high-quality development.

1.8 The operation of CIP has progressed substantially since it commenced in 2017. Further review has been carried out and additional steps have been identified to improve its functioning further.

## 2. Recommendations

The Executive Councillor is recommended to

2.1 Approve the recommendations from the Buro Happold Report, and to include them in the Updated Sustainable Housing Design Guide so that all council developments will be required to:

- Target Net Zero Carbon from 2030.
- Target Passivhaus certification from 2021.
- Attain Sustainability targets for water, overheating, post-occupancy evaluation (POE), Electric vehicle charging, car parking and biodiversity.

To attain this will require the adoption of:

- the Sustainability Roadmap to Net Zero Carbon.
- the decision-making process for sustainability standards.
- the seven principles of sustainability.

2.2 Approve the following delivery strategy:

2.2.1. Pursue a mix of delivery strategies to deliver the 10-year programme.

2.2.2. The majority of the programme to be delivered through CIP.

2.2.3. A programme of smaller schemes to be delivered through design and build contracts.

2.2.4. Purchase of affordable units from developers delivered as a result of S106 agreements.

2.2.5. Consideration of other opportunities which may arise for joint ventures or development agreements with other partners.

## 3. Background

- 3.1 In September 2020 as part of the MTFs proposals were put forward for a new 1,000 net new Council homes programme. This was accompanied by a report setting out the framework principles of the new programme.
- 3.2 This paper provides an update on the new programme work and focuses specifically on two areas- sustainable housing standards and delivery routes.
- 3.3 As part of the framework presented in September there was a commitment to higher sustainability standards and additional capital allowances were built into the MTFs to support this. It was noted that work had been commissioned with Buro Happold to review the options and implication for the new programme. There have been member, officer, and tenant representative briefings to go through the detail of this work to explain the approach and what it will mean for the Council and our residents.
- 3.4 The report in September 2020 set out a need to identify not only where new housing delivery can come forward but also how. The Council needs to have delivery routes available to meet the programme ambitions. A review has been undertaken to assist to consider the options including our direct experience in Cambridge of what has been achieved through different routes.

#### **4. General Progress**

- 4.1 The Council Officers have an approved Project Initiation Document and a New Housing Programme Project Board is operational. Updates on key workstreams / projects are listed below:
- 4.2 Identifying sites:
  - Market intelligence has led to the investigation of a number of possible land opportunities and some small-scale purchases (71-73 Fen Road, 129 Ditton Fields; and continuing negotiations at Queens Meadow. The investigations are continuing.
  - Proposals for a package of sites to deliver Passivhaus units is being presented to this Committee.

- HRA estates review with asset management and housing is continuing.
- A list of possible small HRA sites has been developed: title and access issues are under review in each case.
- A review is under way with Property Services on opportunities on General Fund sites; there will be a report to Strategy and Resources on this.
- Officers are exploring models for ‘airspace development’ - building over existing properties – to assess whether this has any potential.
- Ward Member discussions on possible sites are on-going.

#### 4.3 One Public Estate – East Barnwell Regeneration.

Following the publication in September of the interim master planning document, “East Barnwell – A Framework for Change”, the HDA has commenced public consultation on the work carried out to date.

Working with Abbey People, the HDA ran the East Barnwell Conversation Part 2 from the 30<sup>th</sup> of October to the 14<sup>th</sup> of December.

A virtual “town hall” meeting was held on the 1<sup>st</sup> of December. The comments received will inform the final masterplan report which will be published in Summer 2021. The next stage of the regeneration plans will be developing detailed design options for the key sites identified. The HDA team has applied for further funding from the One Public Estate programme, building on the success of the work carried out to date.

- 4.4. Homes England have released their prospectus for funding opportunities that would fit with this programme. It has been confirmed that Local Authorities can bid to become strategic partners –giving flexibility and programme-level funding rather than only being able to bid on a project by project basis. As well as affordable housing funding, there may be opportunities to utilize their program aimed at unlocking stalled sites and infrastructure development.

### **5. Sustainability Standards**

- 5.1 The 2017 Sustainable Housing Design Guide (SHDG) has informed the design of council house building for the 500 programme and stated a target to meet the Cambridge Local Plan for reduced carbon emissions

(19%) compared to 2013 building regulations. An average of 8 out of 10 schemes in the 500 programme exceeded the SHDG and are expected to attain carbon emissions of 35% below building regulations.

- 5.2 Although progress in sustainability has been encouraging, three policy changes have prompted a review of the current SHDG. First, the Council declared a Climate Emergency in January 2019. Second, the government is proposing changes to building regulations in 2025 by introducing the Future Homes Standards which will mean gas free developments and higher fabric standards. Third, the shared planning service of Cambridge City Council and South Cambridge District Council are developing a new local plan which is likely to be in place from 2025 onwards, with a Net Zero Carbon target for new homes from 2030.
- 5.3 Without changes to the SHDG, the sustainability guidance will be out of date for the Councils proposed 1000 new homes programme. Therefore, it is proposed to update the SHDG to ensure it is fit for purpose for the new programme and to keep ahead of legalisation.
- 5.4 Buro Happold were commissioned to undertake work on developing a roadmap to Net Zero Carbon for new Council developments. The work also considered the benefits and impacts on issues such as capital costs, tenant costs, repair and replacement costs, together with the carbon impacts.
- 5.5 Their work showed that Passivhaus can be delivered within the MTFs whereas Net Zero Carbon exceeds the MTFs parameters, requiring a further £227m borrowing. These increases to Net Zero Carbon would, at this stage, make the programme financially unsustainable. This is in the main due to the on-going maintenance and replacement costs.
- 5.6 Based on the work undertaken and considering the constraints, it is proposed that the Sustainable Housing Design Guide is updated so that all council developments will be required to:
- Target Net Zero Carbon from 2030.
  - Target Passivhaus certification from 2021.

- Attain Sustainability targets for water, overheating, post-occupancy evaluation (POE), Electric vehicle charging, car parking and biodiversity.
- Produce a Sustainability Options appraisal for every development, to include:
  - Future proofing all schemes to Net Zero Carbon when funds permit.
  - Technical and financial justification for not attaining Passivhaus.

5.7 To attain these targets approval is required for the council to adopt the following into the Sustainable Housing Design Guide:

- the sustainability roadmap to Net Zero Carbon.
- the process map in decision making on sustainability.
- the 7 sustainability principles.

5.8 The Buro Happold report summarizes the technology options towards Net Zero Carbon and has suggested the following steps: Local Plan, Local Plan Plus, Passivhaus and Net Zero Carbon. Note that this Sustainability Roadmap also includes other sustainability standards for each step.

# Sustainable housing standard options

## Operational energy

This outlines potential standards and targets that could be applied to new council homes delivered. Standards will be applied through the 'Interim Sustainable Housing Standards 2020'. Standards focus on operational energy, the energy used for living in a home from fixed heating, hot water, lighting, ventilation, plugs, cooking and appliances. It however excludes consideration of electric vehicle (EV) charging.

### 1. Existing Local Plan

Homes will require:

- Typical energy efficiency
- Gas fuelled heating and hot water
- Solar technologies for energy generation

### 2. Local Plan Plus

Homes will require:

- High levels of energy efficiency
- Heat pumps for heating and hot water
- Solar technologies for energy generation
- Hot water store with WWHR

### 3. Passivhaus Certification

Homes will require:

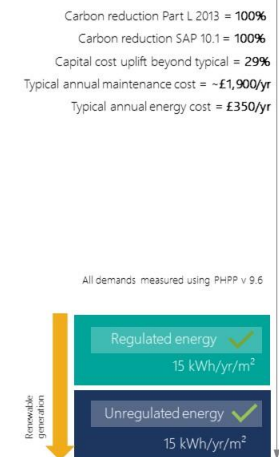
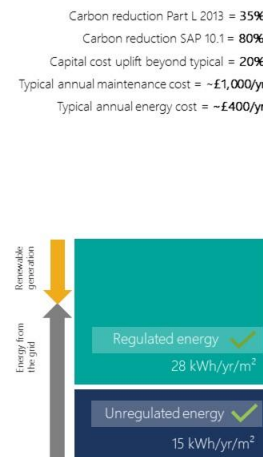
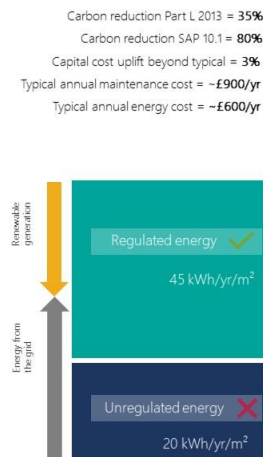
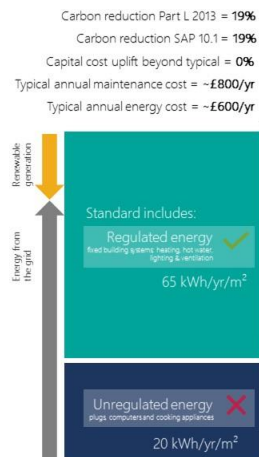
- Ultra-high levels of energy efficiency
- Electric heating and hot water
- Solar technologies for energy generation
- Hot water store with WWHR

### 4. Net Zero Carbon on-site

Homes will require:

- Ultra-high levels of energy efficiency
- Heat pumps for heating and hot water
- Solar technologies for energy generation
- Batteries for energy storage

Building Regulations Part L baseline  
Current UK Government legal requirement for new homes



## Other Sustainability Standards

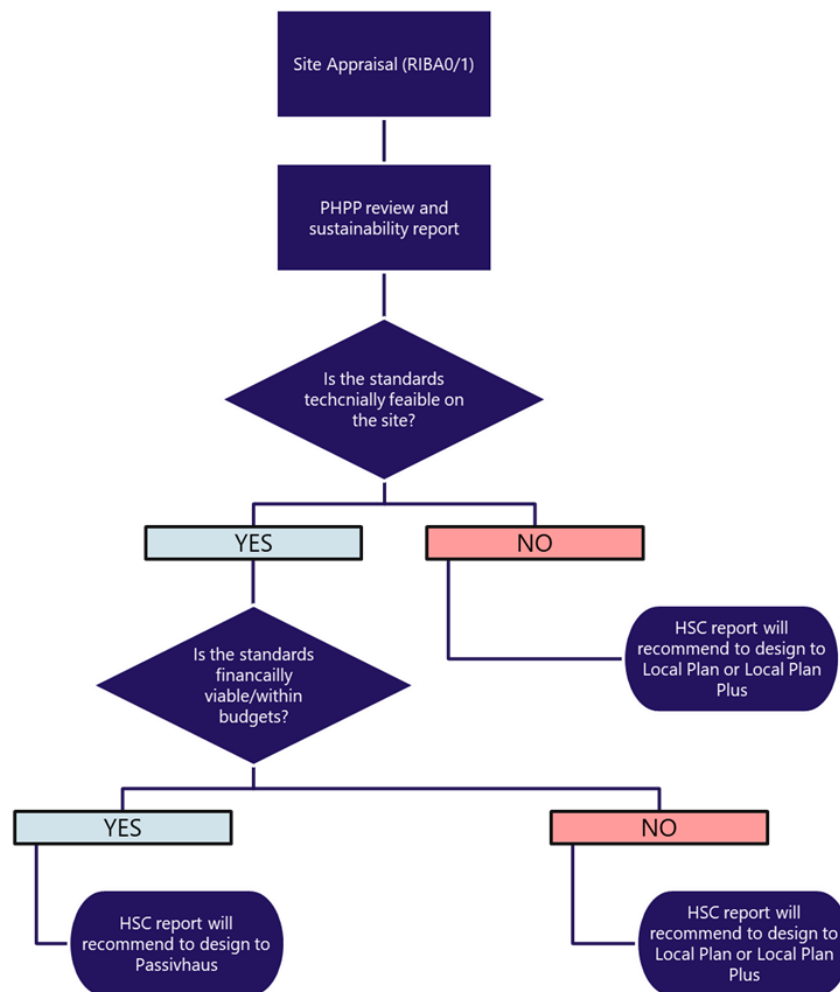
	Baseline	Local Plan Plus	Passivhaus Certification	Net Zero Carbon
<b>Water Summary</b>	110 l/p/d Rainwater for irrigation.	90 l/p/d Rainwater for irrigation.	90 l/p/d Rainwater for irrigation.	80 l/p/d Rainwater for irrigation.
<b>Overheating Summary</b>	Recommended but not mandatory to use TM59.	Mandatory use of TM59 and reduced risk through optimised glazing ratio, building form, balconies, and the use of internal blinds.	More than 25 °C for no more than 10% of hours a year. Mandatory use of TM59 and reduced risk through use of optimised glazing ratio, building form, balconies, and the use of external shading.	Mandatory use of TM59 and reduced risk through use of optimised glazing ratio, building form, balconies, and the use of external shading.
<b>POE Summary</b>	Recommended through SHDG but not mandatory in Local Plan. Reactive ongoing maintenance be Estates teams	POE for first year of occupation with reactive ongoing maintenance by estates teams.	Performance validation for Passivhaus certification and POE for first 5 years of occupation.	Performance validation for Passivhaus certification and POE for first 5 years of occupation.
<b>EV Summary</b>	SPD: 50% active and 50% passive charging points.	SPD: 50% active and 50% passive charging points.	50% active and 50% passive charging points.	50% active and 50% passive charging points.



<b>Other Sustainability Standards</b>				
	<b>Baseline</b>	<b>Local Plan Plus</b>	<b>Passivhaus Certification</b>	<b>Net Zero Carbon</b>
<b>Car Park ratios across developments</b>	~0.7-0.9 parking spaces per home.	~0.5-0.6 parking spaces per home.	0.5 parking spaces per home.	<0.5 parking spaces per home.
<b>Car Club provision</b>		Increased Car Club provision.	Increased Car Club provision all with active charging.	Increased Car Club provision all with active charging.
<b>Biodiversity Summary using DEFRA calculation</b>	10% net gain in biodiversity.	10% net gain in biodiversity.	20% improvement in biodiversity.	20% improvement in biodiversity.
<b>Green Roofs</b>	Flat roof must be green roof.	Flat roof must be green roof.	All roofs to be green/brown roofs.	All features with habitat value to be retained and green/brown roofs.

- 5.9 As stated before, it should be noted that even if finance was not an issue, there are likely to be technical challenges in delivering each sustainability standard on some sites or for all the homes on any given site. Viability issues will also vary from site to site.
- 5.10 Attaining Passivhaus certification and the associated sustainability targets will require supply chains, contractors, the council's estate and facilities teams and tenants to adopt new approaches to house building, maintenance and day to day running of a house/flat. This is not without risk to the council as learning and increasing knowledge takes time to develop. To mitigate against this risk, Buro Happold have advised that the council develops pilot Passivhaus schemes to learn to design and build to a higher sustainability standard. With increased knowledge, the risks will decline as it will be clearer where the technical and financial constraints are.
- 5.11 Therefore, the Council needs to ensure flexibility in decision making, adopting a process that allows such flexibility for sites that have technical and financial constraints.
- 5.12 It is highly recommended that each scheme is assessed on sustainability so that officers and members can make an informed decision to proceed to Passivhaus Certification (or Net Zero Carbon in the future if costs permit). Technically constrained sites are likely to cost more than the additional cost uplift stated in this report.

5.13 The decision-making process below sets out how each development will be appraised in terms of meeting each of the sustainability targets. Where targets may not be technical feasible to meet within the budget, the sustainability appraisal will explain why. For example, in item 14, HSC report on the **Proposed New Build Passivhaus Pilot**, which is a small site scheme, Passivhaus certification is recommended, but the sustainability targets on car parking and biodiversity are more difficult to attain.



5.14 With this flexibility, the Council can ensure that it keeps within the MTFs as well as balancing Council objectives on housing need, tenure and climate change.

5.15 In order to demonstrate a rigorous and transparent approach to sustainability, it is suggested in the Buro Happold report that seven principles of sustainability are adopted in the updated Sustainable Housing Design Guide. These are:

- **Principle 1:** ensure all schemes undertake a PassivHaus Planning Package (PHPP).
- **Principle 2:** start Passivhaus and sustainability standards now developing house types.
- **Principle 3:** ensure all new builds can be retrofitted, where possible, in the future, to Net Zero Carbon.
- **Principle 4:** design and build to Net Zero Carbon only when costs allow and after experiential learning on Passivhaus schemes.
- **Principle 5:** ensure training is provided to upskill Council departments and tenants understanding of Passivhaus technologies.
- **Principle 6:** complete the review on the capital, maintenance, and tenant costs in retrofitting current housing stock to Passivhaus.
- **Principle 7:** adopt Passivhaus certification as the Council's sustainability standard for all Council developments when it is technically and financially possible.

5.16 Where there are technical and financial constraints to developing designs to Passivhaus, there will be flexibility to proceed to Local Plan and Local Plan Plus, but it will be required to demonstrate how a similar level of carbon reduction can be attained.

5.17 The proposed principles set are within the financial envelope approved in the MTFs and should be seen, compared to other local authorities, as ambitious and would make the programme one of the largest portfolios in the country setting such high sustainability standards.

## 6. Delivery Options

6.1 Since the Council returned to the provision of new rented housing it has pursued a range of delivery mechanisms:

- Reliance on the s106 regime.
- Design and Build Contract Procurement with CCC as Developer

- Developer Agreement, CCC development brief for a site, with a private sector partner to deliver to that brief.
- Joint Venture, where CCC works with a private sector partner within a jointly owned “virtual” developer entity.
- Wholly owned Company (which has not at this stage engaged in development).
- Direct development in-house.

6.2 Of these the most significant in terms of volume have been Developer Agreement (Virido, Keepmoat) and JV (CIP), as evidenced in the below table. The table is based upon schemes that have been approved by the Executive Council following reports to HSC.

<b>Delivery mechanism</b>	<b>New Council Rented Units</b>	<b>Total New Units</b>
Reliance on the s106 regime	80	80
Design and Build Contract Procurement with CCC as Developer	26	26
Developer Agreement, CCC development brief for a site private sector partner to deliver to that brief	255	316
Joint Venture, where CCC works with a private sector partner within a jointly owned entity	661	1002
Wholly owned Company	0	0
Direct development in-house	2	2

6.3 This report reviews options for delivery of the 1,000 new Council rented housing programme that was agreed by Exec Cllr at Housing Scrutiny Committee in September 2020. It considers the mechanisms that the Council has used to deliver new housing – most recently in the ‘devolution 500’ programme.

6.4 This report sets out an assessment of the options through a matrix (Appendix 1) summarising considerations against a number of criteria. The aim of the matrix is to stand back and review the options. It takes account of the Council’s experience but does not attempt to describe it or discuss how the Council has addressed issues that have arisen.

Below is a summary of key reasons for the recommendations based on the matrix.

#### **6.4.1 Securing sites and development opportunities**

The JV offers the best opportunity to pursue a range of development opportunities, given the capacity constraints within the Council and the need to bring the Council's objectives into alignment with private sector commerciality to engage with the opportunities successfully. Other options would be more restricted to development on the council's own land.

#### **6.4.2 Achieve proposed sustainability standards (Passivhaus)**

The Council could seek consultants and contractors experienced in Passivhaus through competitive contracting, but this would not secure the continuity through the development process, the access to the supply chain and the learning which are key to delivering Passivhaus. For the JV option it is essential that the JV partner is committed to developing Passivhaus and to the learning process and that this is spread through the supply chain. When this is the case there are substantial advantages. Many of the other options offer the Council little control and are vulnerable to low standards; this negative impact on standards is not confined to sustainability. There are also risks around contract disputes/claims. The in-house option offers the control in principle but there is a capacity issue in delivering that benefit.

#### **6.4.3 Deliver at pace**

The JV has demonstrated significant benefits in delivering at pace, reducing delays in procurement, scheme development and appraisal, and between planning approval and start on site. Some of these benefits could be achieved through development agreements but this will depend upon the successful management of site issues and will be linked to a lower level of control. Design and Build contracts with CCC as developer have been significantly slower. The one project delivered

in-house was slow prior to start-on-site and the other three planned projects have been transferred from in-house delivery.

#### **6.4.4 Deliver open market housing for sale and investigate alternative tenures**

This is required for delivery on purchased land, General Fund sites and potentially some housing regeneration sites. Private sector commerciality is essential to delivering open market housing successfully, and this includes many alternative tenures. In previous cases the HDA has found that some Shared Ownership units of different sizes and unit types are more difficult to sell than others. As per previous committee reports (Item 38, September 2018), without the right experience and knowledge additional costs can be incurred in the market for shared ownership units. The JV offers the opportunity for the commercial awareness to be shared and objectives to be aligned.

#### **6.4.5 Develop the Council's in-house development capability**

It is important to develop the Council's in-house development capacity but also be realistic about the team's capabilities and the need for partners to deliver the programme. There has been significant development of the capacity in the HDA. This has been alongside working with CIP through shared knowledge and learning. The schemes which have been delivered through Design and Build contracting with CCC as developer have been small scale and required a substantial level of management resource throughout the development process. The level of capacity available indicates that this option should be considered for smaller sites. The one scheme that has been delivered in-house required even more substantial management input and this has not continued to be available. The relative costs were also not entirely factored in at the time but have since been found to be significantly higher than costed.

#### **6.4.6 Ensure build quality and effective after-care during defects liability period**

In past Development Agreement schemes from the last 10 years, significant issues have been encountered. In addition, there have been ongoing issues post defects-period, relating to the management of a

CHP scheme and water metering. There are also issues with the Community Centre. There have not been similar issues with the Design and Build with CCC as developer schemes, or with the in-house scheme, but this was linked to a high level of CCC management input.

#### **6.4.7 Value for Money**

The schemes delivered in house and through Design and Build with CCC as Developer have been delivered at lower nominal costs than other elements in the programme but they have required significantly greater management input from CCC which is not reflected in these figures. These have also been small scale schemes delivering straight-forward house types. Generally, the Design and Build with CCC as Developer option is subject to the market position at the time of tender. The level of interest in the tender for the project that was delivered through this route was very low and some of this interest took the form of non-qualifying tenders. There is also an issue of a focus on price and the pressure this can put on contractors and the potential for costs recovery by contractors through claims or through reduced standards. Scheme by scheme tendering also loses benefits of accurate costing related to contractors understanding the specification and of learning and development that can lead to more cost-effective solutions to recurrent problems. Framework agreements are an important way of managing these issues, but these can also be combined with other approaches including delivering through a JV. CCC is now contracting directly as developer though a framework with Hill on 100% Council rented schemes.

#### **6.4.8. Risk**

Delivery through a JV allows the Council to share in commercial risks and benefits with a commercial partner benefitting from their commercial risk management. This includes sharing contracting risks. These risks can then be reduced through a thorough and continuous understanding of the specification and shared learning and identification of solutions. Design and Build Contracts with the Council as developer place design risks on the contractor but are vulnerable to claims and an adversarial approach to cost and delay challenges which arise. This requires the management resource to be directed.

## 6.5 Developing the effective management of CIP - progress and next steps

6.5.1. CIP was established in 2017 as a 20-year partnership with a member's agreement in place and initial business plan. There has been significant work to ensure the effective operation of the partnership in the period between 2017 and 2020. This has included:

- Setting out agreed processes for project approvals.
- Robust programme leadership at Strategic Director and Head of Service level.
- Establishing contractual arrangements for individual projects.
- Ensuring the partnership delivers value for money (VFM) and that there is external verification of this; this has been delivered by Employers Agents appointed for each scheme.
- Ensuring the ambitions of the Council are met on each project; achieved through clear project briefs, leadership and allocation of a Council project manager within CIP and project boards.
- Establishing Employers requirements and robust specifications.
- Quality control throughout the construction phase and monitoring of defects.
- Learning from projects being passed to subsequent schemes.

6.5.2 The CIP vehicle has already exceeded the delivery against the previous Keepmoat programme in a shorter time frame. The 500 programme would not have been delivered at the pace it has without the Partnership, and there is a strong collaborative working environment.

The benefits that CIP has brought to delivery of the Council's housing programme include:

- delivering at scale and pace.
- ongoing learning and development particularly in relation to sustainability.
- early scheme appraisal and development to bring forward new opportunities.
- commercial input to site-finding and mixed tenure developments.



- adding project management capacity to the in-house capacity in the HDA.
- Value for money and high-quality development.

6.5.3 As the Council/CIP moves into a new wave of development it is important to reflect and review opportunities to continue to improve the effectiveness of CIP. Proposals include:

- A new 5-year CIP Business Plan to be developed to include key performance indicators.
- Operate on a programme level basis rather than project level to support delivery.
- Continue Robust Governance through CIP Board and Strategic Director level leadership on officer side.

## 6.6. Proposed strategy

- 6.6.1. It is proposed to pursue a mix of delivery strategies to deliver the 10-year programme, the majority of the programme to be delivered through CIP.
- 6.6.2. A programme of smaller schemes could be delivered through design and build contracts.
- 6.6.3. Opportunities to purchase affordable units from developers delivered as a result of S106 agreements which may arise.
- 6.6.4. Other opportunities may arise for joint ventures or development agreements with other partners.
- 6.6.5. It should be noted that each scheme will continue to require decision by the Executive Councillor following a report to the Housing Scrutiny Committee before proceeding.

## 7. Implications

### (A) Financial Implications

The assumptions for the new programme have been included within the budget setting report and MTFS (Sept 2020).

## **(B) Staffing Implications**

The CIP Investment team is the interface with CIP at Officer (under the Board) and has played an important part in the success of the partnership. The Investment Team is made up of representatives of the Council (Strategic Director, Head of HDA and Senior Development Managers) and representatives of Hill Partnerships. The HDA team is a small yet robust team who have ensured new housing projects are effectively managed. Additional Development officer resource was brought in to support work in progressing new HRA sites.

The team currently has a number of existing schemes as part of the 500 programme to manage, along with identifying new opportunities. Depending on the time frames of schemes and coming in their scale additional resources may be required.

## **(C) Equality and Poverty Implications**

The current Devolution 500 programme is guided by an overarching EQIA, with scheme specific EQIAs being undertaken on a scheme-by-scheme basis as required. A Revised EQIA to inform the Envisaged New Programme is under review.

## **(D) Environmental Implications**

This report covers the approach to low carbon housing.

## **(E) Procurement Implications**

Advice specific to each project.

## **(F) Consultation and communication**

There are no consultation and communication implications of this report. The development framework for new housing by the Council approved at the March 2017 Housing Scrutiny Committee sets out the Council's commitment to involve residents in new housing schemes.

## **(G) Community Safety**

There are no community safety implications for this report. Each scheme specific approval will cover any community safety implications.

## **8. Background papers**

Background papers used in the preparation of this report:

- a) 20/35/HSC report on new programme for 1000 Council homes.

## **9. Appendices**

Appendix 1 – New Programme Matrix of Delivery options.

## **10. Inspection of papers**

To inspect the background papers or if you have a query on the report please contact Claire Flowers, Head of Housing Development Agency, tel: 01223 - 457928, email: [claire.flowers@cambridge.gov.uk](mailto:claire.flowers@cambridge.gov.uk).