



NEWCASTLE-UNDER-LYME BOROUGH COUNCIL AND STOKE-ON-TRENT CITY COUNCIL

Invitation to Tender for – Retail and Leisure Study

Contract Number: PGP/2018/521

1. Introduction

1.1 You are invited to submit a quotation for a new Retail and Leisure study for the Borough of Newcastle-under-Lyme and the City of Stoke-on-Trent. This work will be an important element of the Council's evidence base which will inform the ongoing preparation of the councils' Joint Local Plan.

1.2 It is essential to comply with the following instructions in the preparation and submission of your quotation. The Council reserves the right to reject a quotation that does not fully comply with these instructions.

1.3 Consultants must demonstrate that they offer a first class multi-disciplinary team with direct relevant experience in undertaking this type of commission, supported by suitable references to demonstrate a successful track record in carrying out this type of study. Consultants must be able to demonstrate an excellent working knowledge of Retail and Leisure Studies.

1.4 Your quotation must be submitted no later than 5pm on 9th April 2018. All completed quotations must be submitted via e-mail with paper copies to follow.

The primary contact officer for the project is:

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2. Background & Context

2.1 Newcastle-Under-Lyme Borough Council and Stoke-on-Trent City Council have agreed to work jointly in the preparation of a new Joint Local Plan. This will replace the current adopted [Newcastle-Under-Lyme and Stoke-on-Trent Joint Core Spatial Strategy, 2009](#) and the saved policies from the [Newcastle-under-Lyme Local Plan 2011](#) and the [Stoke-on-Trent City Plan 2001](#).

2.2 The Joint Local Plan will set out planning policies for development and site allocations within the area up until 2033. To date, the councils have undertaken a number of consultation exercises including:

- Strategic Issues (February - March 2016)
- Strategic Options (17 July - 22 August 2017)
- Preferred Options (1st February – 1st March 2018)

2.3 As part of the ongoing work towards the Joint Local Plan, work continues on a variety of evidence base documents with an aim of consulting on a draft Joint Local Plan November 2018 and adoption of the Joint Local Plan in 2019.

3. Current Retail & Leisure Evidence

Stoke-on-Trent City Council Retail and Leisure Study 2014

3.1 Stoke-on-Trent City Council commissioned White Young Green (WYG) in 2013 to undertake a City- wide Retail and Leisure Study and Health Check. The study explored the need and capacity over the period to 2028 and provided updated information regarding the performance of the main city and town centres across the city. The study was particularly pertinent given the down turn in the economy since the previous retail and leisure study completed by Savills in 2005 which underpinned the Core Spatial Strategy. The WYG study made a number of recommendations to be considered through the local plan making process including:

- potential floorspace that could be supported over the 15 year period (2013 – 2028) for both convenience and comparison floorspace.
- Focusing the provision of convenience goods retailing on the implementation of the Morrisons (or another operator) at Highgate to help deal with the cumulative over-trading experienced in the area to clawback expenditure currently spent further afield outside the study area.
- To develop a new foodstore in Stoke town centre and Tunstall, whilst resisting new facilities in out-of-centre locations elsewhere.
- To focus new comparison floorspace in Stoke City Centre to enhance the importance of Stoke City Centre in the wider region.
- The allocation of the former Spode site as a potential retail redevelopment site. The site presents an opportunity for further retail development (convenience-led) in the town centre and will help to encourage investment in this part of the town centre.
- The opportunity to develop a “unique” themed retail destination in Stoke Town (or other Towns) that is related to the historical ceramic and pottery industry.
- Longton is identified as a potential area for intervention due to the number of vacant properties, lower levels of footfall and the need for environmental improvements.

- The development of a holistic strategy to ensure that initiatives are channelled to ensure a wide range of land uses are promoted to central locations.
- The re-evaluation of the existing retail hierarchy set out in the adopted Core Spatial Strategy and distribution to reflect a more responsive hierarchy with the ability to respond to changing economic conditions and roles of individual centres.
- To review the boundary for Stoke City Centre, Longton Town Centre, Stoke Town Centre and Tunstall Town Centre.
- To identify an impact threshold for the scale of edge-of-centre and out-of-centre development which should be subject to an impact assessment.

3.2 The full study is available on the Stoke-on-Trent City Council website and can be found following the link below:

https://www.stoke.gov.uk/directory_record/333059/stoke_retail_and_leisure_study_-_march_2014

Newcastle-under-Lyme Borough Council Retail & Leisure Study 2011

3.3 Newcastle-under-Lyme Borough Council completed a Borough wide assessment of the future need for additional retail, commercial leisure facilities and other town centre uses for the main town centres of Newcastle-under-Lyme and Kidsgrove in 2011 and updated the North Staffordshire Retail and Leisure Study (2005 - 2021)

3.4 The study made a number of recommendations & actions that the Council could pursue in order to maintain and enhance the vitality and viability of shopping centres within the borough. These included:

- Taking measures to bring forward development opportunities, particularly the former Sainsbury's site at Ryecroft to improve the availability of modern premises suitable for new occupiers.
- adopt floorspace thresholds for Newcastle-under-Lyme (1,000 sq.m gross and above) and Kidsgrove (500 sq. m gross and above), against which the impact of edge-of-centre and out-of-centre applications should be assessed;
- review the extent of the Newcastle-under-Lyme town centre boundary and condense the primary shopping frontage. Consideration should also be given to the introduction of a secondary shopping frontage to provide stronger guidance over the primary shopping area; and
- define locally important impacts on centres which should be tested for all proposals for edge-of-centre and out-of-centre retail. Such locally important impacts could include the potential impact upon the deliverability and viability at Ryecroft and the 'market town' character of Newcastle-under-Lyme town centre.

The full study is available on the Newcastle-under-Lyme Local Plan evidence base page of the website: <https://www.newcastle-staffs.gov.uk/all-services/planning/planning-policy/planning-policy-monitoring-and-evidence>

3.5 In order to robustly support the production of the new Joint Local Plan, Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council require an update on the previous retail studies. It is now considered to be an appropriate time to update the previous studies.

3.6 It is intended that the new study will update the current evidence base by identifying and establishing the future need for and options for the possible distribution of, new convenience and comparison retail floorspace and commercial leisure development across Newcastle – under-Lyme and Stoke-on-Trent.

3.7 It will also provide the Councils with an objective and detailed assessment of expenditure flows and need in order to evaluate submissions in support of planning applications.

4. Planning Policy Background

National Policy and Guidance

4.1 The National Planning Policy Framework was published in March 2012 and section 2 “ensuring the vitality of town centres” sets out that Local Planning Authorities should plan positively, to support town centres to generate local employment and to promote beneficial competition within and between town centres.

4.2 It sets out that planning policies should be positive and promote competitive town centre environments and places great emphasis on local planning authorities recognising that town centres are at the heart of their communities and therefore should support their vitality and viability.

4.3 Planning Authorities should have a clear understanding of the need for land or floorspace for retail and leisure development, including both the quantitative and qualitative needs for all foreseeable types of activities over the plan period, taking into account relevant market signals.

4.4 There should also be a clear understanding of the role and function of town centres and the relationship between them, including any trends in the performance of centres, identifying any deficiencies in provision and identify the centres where development will be focussed by assessing the capacity of centres to accommodate new development. Any existing allocations for town centre uses should be reviewed and, if necessary, additional sites should be identified and allocated. Where it is considered there isn't a need for new development, it will not be necessary to allocated sites, but criteria based policies should be developed that will enable any new development proposals to be assessed.

Draft National Planning Policy Framework Consultation March 2018

4.5 The draft consultation suggests that Local Planning Authorities should consider allocating sites to meet future requirements for town centre uses over a 10 year period not necessarily the full plan period due to uncertainties in relation to forecasting longer retail trends. The consultation also suggests that town centre boundaries should be kept under constant review and where town centres are in decline Local Planning Authorities should support the diversification of uses, while avoiding the loss of essential services.

Local Planning Policy

4.6 There are a number of strategic aims and policies within the adopted Core Spatial Strategy (2009) that relate to the City, Towns and Local Centres.

- **Strategic Aim 7 (SA7)** – To enhance the City Centre of Stoke-on-Trent's role as a sub-regional commercial centre; to help Newcastle Town Centre to continue to thrive as a strategic centre, both within a network of accessible and complementary, vital, vibrant and distinctive North Staffordshire town Centres.
- **Strategic Aim 11 (SA11)** - To focus development within the communities of Loggerheads, Madeley and Audley Parish to support their function as rural service centres which meet the needs of people locally.

4.7 The Core Spatial Strategy identified the hierarchy of the network of centres as a key element to ensure that an appropriate balance of development will continue towards enhancing the vitality and viability of all centres.

4.8 The policies in the Core Spatial Strategy relevant to the city, towns and local centres include:

- **Policies SP1 & SP2** which seek to direct retail and office development towards the City Centre and Newcastle Town Centre. The diversification and modernisation of centres for new business investment, particularly in terms of retailing, education, leisure, entertainment, culture, office development and residential development that is appropriate to the scale and nature to their respective position and role within the retail hierarchy.
- **Policy ASP1 (City Centre of Stoke-on-Trent Area Spatial Policy)** Sets out that over the plan period (2006 – 2026) mixed use proposals will provide for 80,000 sqm of additional gross comparison retail floorspace to 2021 and a further 40,000 sqm to 2026 plus 85,000 sqm of additional gross office floorspace within or on the edge of the core City Centre. The City Centre is identified as the largest retail destination in North Staffordshire and South Cheshire and therefore the centre has a primary role at a sub-regional level in attracting large scale shopping development. Policy ASP1 therefore seeks to promote a broad spectrum of uses, attractions and facilities, encompassing commercial development, shopping, leisure and cultural attractions to ensure that the City centre retains the focus for city centre uses with new floorspace providing a complementary rather than competing role and recognising the individuality of other centres set out in the retail hierarchy.
- **Policy ASP2 – Identifies the area spatial policies for the Inner Urban Core.** The policy sets out transformation of the Inner Urban Core and the regeneration priorities. Burslem is identified as providing opportunities for a wide range of new uses and the importance of improving the town's image by enhancing conservation standards, public realm and design. Provision has been made for a sustainable mixed use scheme for approximately 2000sqm of additional retail floorspace. Stoke is also included and the policy seeks to enhance the quality of the centre, whilst not competing with the City Centre. In order to increase the attractiveness in the centre, the policy makes provision for at least 4000 sqm of retail floorspace.
- **Policy ASP 3 (Stoke-on-Trent Outer Urban Area Spatial Policy)** The policy sets out the area spatial policy for strategic centres in the Outer Urban Core. This includes Longton, the third largest retail destination in North Staffordshire and principally serves the Southern part of the city, Tunstall and its role to serve the local catchment in the northern part of the city, Fenton offering a limited retail provision to serve a localised catchment however providing a sport and leisure focus for the city and Meir, which provides the eastern gateway to the City.
- **Policy ASP 4 (Newcastle Town Centre Area Spatial Policy)** The policy sets out that over the plan period 25,000sqm of additional gross comparison retail floorspace to 2021 and a further 10,000sqm to 2026. In addition 60,000sqm of additional gross office floorspace within, or on the edge of the town centre, to accommodate new employment of a type in keeping with the role of the Town Centre. The unique historic market town character and ambience will be enhanced to improve the attractiveness and viability of the Open Market, Town Centres public realm and open spaces.

Newcastle-under-Lyme Local Plan (2003) Saved policies

- **Policy R12 Development in Kidsgrove Town Centre**

Development for retail or leisure uses within or close to Kidsgrove Town Centre as defined on the Proposals Map will be encouraged so long as the following requirements are met:

- i) The development should not harm the vitality and viability of the centre.
- ii) Any opportunities to improve conditions for pedestrians should be exploited.

- **Policy R13 Non-retail uses in Kidsgrove Town Centre**

In determining applications for changes of use from retail (Class A1) to non-retail uses in Kidsgrove Town centre the Council will consider the effect of the proposal on the range of goods and services offered in the locality. In considering the effect of the proposed change account will be taken of other changes from retail to non-retail that have already taken place in the centre.

- **Policy R14 Development in District Centres**

New development or redevelopment for retail or leisure uses within or close to the district centres of Chesterton, Silverdale and Wolstanton as defined on the Proposals Map, will be encouraged so long as the following requirements are met:

- i) The likely catchment for the development should be appropriate to the size of the centre.
- ii) The development should not harm the vitality and viability of the centre.
- iii) Any opportunities to improve conditions for pedestrians should be exploited.

- **Policy R15 Non-retail uses in district centres and other groups of shops**

In determining applications for changes of use from retail (Class A1) to non-retail uses, in the district centres of Chesterton, Silverdale and Wolstanton and other groups of 3 or more shop units, the Council will consider the effect of the proposal on the range of goods and services offered in the locality. Material considerations will include not only the proposed development itself but also the cumulative effect of the development and any others that have already taken place.

4.9 The Policies in the Core Spatial Strategy were informed by the now revoked Regional Spatial Strategy and Savills Retail and Leisure Study completed in 2005. These policies and the evidence that underpins them is now considered to be out of date in the context of changes in national policy and the changing economic and retail markets and therefore new evidence is required to support the formulation of new policies as part of the new Joint Local Plan.

5. Project Brief - Aims and Objectives.

5.1 The aims and objectives of the study include the following:

- A quantitative assessment of capacity and need for convenience and comparison goods floorspace to 2033 with short, medium and long term requirements based on current market shares and retention of expenditure, and an assessment of whether rates of retention of expenditure are considered acceptable.
- A qualitative analysis and identification of any need for convenience floorspace, including the provision of top-up convenience shopping in the strategic centres, larger and smaller town centres, district, local and neighbourhood centres.

- A qualitative assessment of capacity and the need for any commercial leisure facilities across Newcastle and Stoke including health and fitness, bingo, small scale casino, cinema, theatre and restaurant / pub / club provision.
- A health check of the existing centres based on NPPG criteria, highlighting any changes since the last health checks.
- A qualitative assessment of current and emerging market conditions and trends in the retail industry, including short, medium and long term operator aspirations.
- Recommendations with regards to a strategy for a network and hierarchy of centres, including strategic, larger and smaller urban towns and district, neighbourhood and local centres, across the plan area, considering how the role of different centres will contribute to the overall spatial vision across the plan area.
- An assessment/ establishment of strategic and town centre boundaries, along with an assessment of primary shopping areas and the potential introduction of primary and secondary frontages.
- An assessment of the potential of existing centres across the plan area to accommodate any anticipated future retail or commercial leisure development, having regard to the centre's scale and nature and identifying both sites where growth could be accommodated and areas which could not accommodate further development.
- Consider the scope for the way distinctive or specialist retail roles could be accommodated without compromising the retail hierarchy.
- To consider evidence and make recommendations on the setting of a local threshold for retail impact testing taking into account the responses received through the Preferred Options consultation.
- An assessment of existing and approved retail and leisure floorspace across the plan area and immediately outside the defined study area that may have an impact on existing centres, including the Trentham Shopping Village.

6. Scope of the Study

6.1 The work involved in the study will require a written report divided into two main sections, involving a number of stages including:

Section A – Research

- a) A summary of **current and draft policy and existing and potential future trends** in retail and commercial leisure;
- b) An updated **health check** of key centres including, Stoke City Centre (Hanley), Tunstall, Longton, Fenton, Stoke, Burslem, Meir, Newcastle, Kidsgrove, Wolstanton, Chesterton and Silverdale. The assessment should include an assessment of the City and Town Centre Boundaries, Primary Shopping Areas and consideration for the establishment of Primary and Secondary frontages. The following indicators should be used as part of the assessment:
 - diversity of uses (number of units, type and amount of floorspace)
 - proportion of vacant street level property
 - commercial yields on non-domestic property
 - customers' views
 - retailer representation and intentions to change representation

- commercial rents
 - pedestrian flows
 - quality of car parking
 - accessibility
 - perception of safety and occurrence of crime
 - state of centres environmental quality
- c) An **updated health check of District, Local, Neighbourhood and Rural Centres** to understand their current role and the provision of facilities, including the proportion of national operators, the type and scale of facilities, including concentrations and the number of vacancies.
 - d) A **Strategic Centres (City Centre (Hanley) and Newcastle) users survey** including a survey to explore the shopping patterns of users outside the immediate catchments to supplement the household survey with wider catchment considerations.
 - e) A **Strategic Centres (City Centre (Hanley) and Newcastle) town centre business survey**, including existing businesses, retailers/ businesses not present and investors.
 - f) **Identification of the study area and catchments** to enable the area to be split into postcode sectors for analysis.
 - g) An **inventory of existing and approved retail and leisure floorspace** (based on information provided by the Councils) and an estimation of turnover and trading levels. Significant retail and leisure provision immediately outside of the defined study area should be identified;
 - h) A **household telephone survey** of approximately 1300 households to establish shopping and leisure spending patterns across the plan area;
 - i) Provide evidence and advice on the setting of a local threshold for **retail impact** testing as identified in the NPPF.

Section B – Analysis

- a) **Identification of gaps in provision/ future provision** evidenced by ‘food deserts’ (areas suffering from social exclusion from retail services) or any areas experiencing high levels of expenditure leakage. An assessment should also be undertaken of what level of leakage is considered acceptable and realistic, based on reasonable access to retail and leisure facilities and the provision of facilities in adjoining areas;
- b) Estimation of the **potential for new floorspace** over the next 5, 10 and 15 years above that currently established or approved, based on population projections, new development patterns and spending on retail and leisure;
- c) Presentation of different **options for the distribution of potential new convenience and comparison retail and leisure floorspace** across the plan area in order to meet any identified need in accordance with the principles of sustainable development.
- d) An assessment of the **implications of any committed or proposed major retail or leisure development**, including an in centre and out-of-centre split.
- e) A brief assessment of known and potential **operator aspirations** for new floorspace in the study area. This should address site area and / or floorspace specifications and any preferred locations.
- f) An assessment of potential solutions to changing operator retail models, including the increase in internet shopping and click and collect.

6.2 In the event that the consultants believe that the content of any of the above components should be varied and / or other information not mentioned should be taken into account in the study, to reflect National Planning Policy Guidance or best practice, they should refer to

it and give a reasoned justification for its inclusion as part of the overall study, together with itemised costs of the variation(s).

6.3 It is expected that the Council's contact officer will be given regular updates and that input from the Councils will be required on the design of the **town centre shopper and business surveys and the household survey questionnaire** to ensure compliance with Council policies and previous surveys.

7. Project Outputs

7.1 The main outcome of the study will be a report setting out

- Results and analysis of the household, business and user surveys, new expenditure and population data and in centre surveys detailing how the results influence retail need.
- A health check for each of the Strategic Centres, Larger Urban Towns Centres, Smaller Urban Towns Centres, District, Local, Neighbourhood and Rural Centres clearly showing the health of the centres and identifying with recommendations as to their future within the retail hierarchy.
- An updated list of the required retail capacity for the plan area for the next 20 years and reference to how this has changed from previous studies and detailed reasons for the change. This should include a food and non-food breakdown.
- A locally defined retail impact test level which is robust and useable through the development management process.
- Recommendations to inform the potential future roles of the key centres in Stoke-on-Trent and Newcastle-under-Lyme and advice on potential specialist retail roles to support them.
- Appendices detailing and explaining calculations at every stage
- An executive summary of findings and policy recommendations based on the completed research and analysis.
- Consultants will be required to undertake a presentation of the findings of the study to members and officers prior to final completion.

8. Information to be provided by the councils

8.1 The Council will supply the following information to the successful consultants:

- The Stoke-on-Trent WYG Retail & Leisure Study March 2014 and associated appendices.
- Newcastle-under-Lyme Retail & Leisure Study 2011
- Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2009
- Joint Local plan Issues Consultation Document February 2016
- Joint Local plan Issues Consultation Response Document
- Joint Local Plan Strategic Options Document July 2017
- Joint Local Plan Strategic Options Response Document
- Joint Local Plan Preferred Options Document – February 2018
- Joint Local Plan Preferred Options Response Document

9. Reporting Process

9.1 Appointed consultants will be expected to attend meetings to provide progress reports to the participating Councils, at points to be agreed at the inception meeting for the project. In between these scheduled meetings it will be the responsibility of the consultants to keep the Councils informed of any progress or issues arising in the completion of the study. In order to operate this joint commission efficiently the Councils will work together, however these commission review meetings will be co-ordinated by Stoke-on-Trent as the lead authority.

9.2 The Councils also have a Joint Advisory Group which enables the Councillors from the two authorities to review progress and direct activity in relation to the planning system, including this commission. The consultants should therefore be prepared to report to the Joint Advisory Group prior to final report stage.

9.3 Copies of the draft report will be submitted to the Councils for approval prior to the sign off of the final report. A total of 2 bound copies of the final report per authority, including a separate executive summary, shall be provided as part of the commission as well as an electronic copy. All reports should be print friendly. All mapping data should be made available to the Councils in a GIS file format.

9.4 All data collection and analysis will be the responsibility of the appointed consultants. The Councils will retain ownership of the final report and the results of surveys and site assessments, including all data, reports and any additional materials.

9.5 Consultants will need to agree that by preparing the Retail & Leisure Study they will not be able to act for another organisation or individual with respect to representations, which consider or challenge any aspect of the study.

10. Timescales

10.1 The contract is anticipated to be awarded to the successful bidding company in March 2018. Work is expected to begin immediately following the initial inception meeting. The delivery of the final report will be required by August 2018. A draft timetable is set out below and it is anticipated that the key milestones will be developed and refined at the initial inception meeting.

11. Indicative Timetable:

	Key Stages:	Dates:
1	Advertisement of Invitation to Quote	21st March 2018
2	Deadline for Submissions	9th April 2018
3	Steering Group Evaluation of Submissions	W/C 9 th April 2018
4	Interviews	W/C 16 th April 2018
5	Contract Award	W/C 16 th April 2018
6	Inception Meeting with Steering Group	W/C 30 th April 2018
7	Research/ presentation of the draft city/ town centre boundaries.	May 2018
8	Data Analysis	June 2018
9	Preparation of Draft Report	June 2018
10	Modification of Report following Feedback from Steering Group	W/C 16 th July 2018
11	Final Report	W/C 6 th August 2018

11.1 Consultants are required to submit a detailed project plan setting out key milestones which will be met as part of the submission.

11.2 If consultants believe that the timetable set out above should be varied to reflect realistic timescales, consultants are asked to submit the variation alongside the written quotation with a reasoned justification and any cost implications.

11.3 The consultants will be required to report to the contact officer on a regular basis to monitor progress and ensure that deadlines as set out in the written quotation are met.

12. Tender Documentation and Method Statement

12.1 Consultants should provide a detailed method statement setting out the consultants proposed approach to the project brief. The method statement should aim to demonstrate how consultants aim to develop a robust methodology.

12.2 As part of the method statement and setting out the proposed methodology, consultants should consider whether there are any potential issues that may need to be considered through the assessment process. Consultants should be able to demonstrate how they will deal with these issues, drawing experience and guidance in order to develop a clear and transparent methodology.

12.3 Engagement with stakeholders is a key element of the project and therefore sufficient time should be built into the timetable in order to ensure that effective engagement can be undertaken. Submission statements should clearly set out how and when they think this is appropriate, and provide a list of stakeholders they think should be involved in the assessment.

12.4 If consultants consider that an alternative approach or additional elements should be incorporated and considered as part of developing a robust and consistent methodology for the Retail & Leisure Study, then these should be supported with a reasoned justification and timetable.

13. Indicative Budget

13.1 It is expected that the study will be at a total cost of around £35,000 - £45,000. Tender submissions should include a breakdown of the costs for each element of the project and for each individual authority. As this will be a joint study, the submission should also include a breakdown of costs anticipated for each local authority as well as the total cost of the commission.

14. Evaluation Criteria

14.1 Proposals will be evaluated against the quality of the proposal and the price of the bid. 30% of the award will be awarded for the price with the remaining 70% being distributed over the following:

- Technical merit of the proposal (20% of the marks)
- Understanding of the project requirements (20% of the marks)
- Staff and other resources (10% of the marks)
- Management and communications (10% of the marks)
- Programming.(10% of the marks)

The technical/ quality of the proposal will be evaluated using the following matrix:

- Score 5 marks – if all requirements are met and response provided is excellent.
- Score 4 marks - if most requirements are met and response provided is good.

- Score 3 marks - if some requirements are met and response is average.
- Score 2 marks - if answer provided is not comprehensive and below average.
- Score 1 mark – if answer provided is poor.
- Score 0 marks - if no information provided.

Price Evaluation (30% of marks)

The commercial score will be calculated using the following formulae: $\text{Lowest Total Price} \div \text{Bidders Total Tendered Price} \times 30 = \text{marks awarded}$.

15. Payment

15.1 The council will make interim payments in line with an agreed project plan up to a maximum of 50% of the total project cost prior to the production of the draft report.