



Report to:	Cabinet – Monday, 11 July 2022
Lead Cabinet Member:	Councillor Dr. Tumi Hawkins, Lead Cabinet Member for Planning
Lead Officer:	Stephen Kelly, Joint Director of Planning and Economic Development

Neighbouring Local Plan Consultation Responses

Executive Summary

1. This report highlights relevant issues for, and seeks agreement to key responses to, two current Local Plan consultations in districts neighbouring or near to Greater Cambridge. It also reports on a response already made to a recent consultation of the same kind for which the consultation has closed. Given the proximity of these districts to South Cambridgeshire, the contents of these Local Plans could in principle impact on the emerging joint Greater Cambridge Local Plan, and a joint response from Greater Cambridge is recommended.
2. The consultations addressed in this report are:
 - East Cambridgeshire Local Plan Single Issue Review Proposed Submission (Regulation 19) – consultation closed 13 June and response already submitted
 - West Suffolk Local Plan Preferred Options (Regulation 18) – response proposed
 - Bedford Borough Local Plan 2040 Plan for Submission (Regulation 19) – response proposed

Key Decision

3. No

Recommendations

4. Cabinet is recommended to:
 - a. Agree the proposed response to the West Suffolk Local Plan Preferred Options (Regulation 18) consultation as set out in Appendix A, and the proposed response to the Bedford Borough Local Plan 2040 Plan for Submission (Regulation 19) as set out in Appendix B

- b. Agree that any material changes to the responses to the West Suffolk Local Plan Preferred Options (Regulation 18) and the Bedford Borough Local Plan 2040 Plan for Submission (Regulation 19) arising from consideration by Cabinet will be agreed via an out of cycle decision by the South Cambridgeshire Lead Cabinet Member for Planning in liaison with the Executive Councillor for Planning and Infrastructure, and in consultation with the Chair and Spokes of the Cambridge City Council Planning & Transport Scrutiny Committee.
- c. Agree to grant delegated authority to the Joint Director of Planning and Economic Development, in liaison with the South Cambridgeshire Lead Cabinet member for Planning and the Cambridge City Council Executive Councillor for Planning and Infrastructure, to make any minor editing changes to the responses to the West Suffolk Local Plan Preferred Options (Regulation 18) and the Bedford Borough Local Plan 2040 Plan for Submission (Regulation 19).

Reasons for Recommendations

5. The contents of the neighbouring or nearby Local Plans referred to in this report could in principle impact on Greater Cambridge and have implications for the emerging joint Greater Cambridge Local Plan. The proposed responses seek to minimise negative and maximise the positive impacts of these plans on Greater Cambridge.

Details

Overview of consultations and principles for responding

6. Local plan consultations for districts neighbouring South Cambridgeshire are taking place on the following timelines in summer 2022:
 - East Cambridgeshire Local Plan Single Issue Review Proposed Submission (Regulation 19): 3rd May-13th June
 - West Suffolk Local Plan Preferred Options (Regulation 18) consultation: 26th May – 26th July
 - Bedford Borough Local Plan 2040 Plan for Submission (Regulation 19): 15th June – 29th July 2022
7. West Suffolk Local Plan consultation is at Regulation 18 stage, which sets out draft proposals for comment. Responses to such consultations can be on any relevant topic and will inform later versions of the plan being prepared. East Cambridgeshire and Bedford Borough Local Plan consultations are at Regulation 19 stage, which is a consultation on what that Council considers to be the version of the plan ready to be submitted for independent examination. Responses at this stage must relate to the 'soundness' of the plan (see National Planning Policy Framework paragraph 35), or to its legal procedural compliance. The Council preparing the plan will not make further amendments to their plan in response to representations made, but will instead share representations with the independent

inspector examining the Plan for them to consider. The exception to this would be if the Council preparing the plan concluded in response to representations that material changes needed to be made to the plan. In this case the Council would need to undertake a further consultation on those changes before the plan could be submitted.

8. The proposed responses to consultation included in this report focus comments on aspects that impact on Greater Cambridge rather than providing a general commentary on the merits of each plan, which is a matter for that council with their community and ultimately their inspector. Notwithstanding, given both Cambridge City Council and South Cambridgeshire District Council's ambitious policy approaches regarding climate and biodiversity as set out in the Greater Cambridge Local Plan First Proposals, together with the cross-boundary (and indeed global) nature of both opportunities and impacts in relation to these topics, officers recommend that the consultation response to the West Suffolk Regulation 18 plan referred to in this report should note the approach to these topics taken in the First Proposals, and encourage the relevant local authority to adopt similarly ambitious policy approaches in their respective plan.
9. Given that issues raised in these consultations are relevant to the joint Greater Cambridge Local Plan, these recommended responses were considered by Cambridge City Council's Planning and Transport Scrutiny Committee on 28 June, following which the recommendation was agreed by the Executive Councillor for Planning and Infrastructure. Any material changes proposed by South Cambridgeshire District Council arising from the Cabinet meeting would need to be agreed by the South Cambridgeshire Lead Cabinet Member for Planning via an out of cycle decision, in consultation with the Cambridge Executive Councillor and in consultation with the Chair and Spokes for the Planning & Transport Scrutiny Committee.

East Cambridgeshire Local Plan Single Issue Review Proposed Submission (Regulation 19) – report of response made

10. East Cambridgeshire's Single Issue Review Proposed Submission (Regulation 19) consultation closed on 13th June. As such this report records the response that Greater Cambridge Shared Planning submitted on behalf of Cambridge City Council and South Cambridgeshire District Council for committee's information.
11. The Single Issue Review is in respect of their housing requirement and delivery of growth, on which basis they conclude no new housing allocations are required. East Cambridgeshire are not proposing any amendment to the plan period or other policies in the Local Plan at this time. As a result, it is considered that there are no issues relevant to or impacting on Greater Cambridge.
12. The following response was made: "Thank you for consulting Cambridge City Council and South Cambridgeshire District Council. We do not consider that the East Cambridgeshire Local Plan Single Issue Review Proposed Submission has

any implications for Greater Cambridge, and as such will not be making any comments to this consultation.”

13. As a non-substantive response, that also reflected the response made to an earlier consultation, this was agreed by the Joint Director of Planning and Economic Development, with the response communicated to the South Cambridgeshire Lead Cabinet member for Planning and the Cambridge City Council Executive Councillor for Planning and Infrastructure.

West Suffolk Local Plan Preferred Options (Regulation 18) consultation – proposed draft response

14. The West Suffolk Local Plan Preferred Options (Regulation 18) consultation runs between 26th May – 26th July. The Preferred Options consultation document has been prepared in three main parts: Part 1 – strategic policies, Part 2 – non-strategic policies, Part 3 – site allocations; and sets out the policy parameters and purpose of each policy area. A series of questions in each section invite comments on whether the right preferred option sites and policy parameters have been identified together with reasons why alternative options have not been taken forward. The next stage will be to draft the plan which West Suffolk Council intends to submit to the Planning Inspectorate; consultation on the Submission draft local plan (Regulation 19) is anticipated in May 2023.
15. West Suffolk has a close relationship with Greater Cambridge, with a shared travel to work, housing market and economic area. Higher wages in Greater Cambridge are a pull factor for residents in West Suffolk but overall West Suffolk report that it is a net importer of jobs (more people go to work in West Suffolk than commute out). Much of the employment land is close to the main towns on the A11/A14 corridor. Transport, energy supply, and water supply in an area of water stress, health services and education provision are identified as strategic matters. Further evidence is being prepared to inform the draft West Suffolk Local Plan; A Gypsy and Traveller Accommodation Needs Assessment is being prepared jointly with GCSP and other Cambridgeshire authorities.
16. The Preferred Options Plan raises no significant concerns relevant to Greater Cambridge. The response set out at Appendix A focusses on the following points:
- Note the close relationship between Greater Cambridge and West Suffolk, with a shared travel to work, housing market and economic area. Encourage commuting trips by sustainable modes by locating new development in locations with good access to sustainable travel options, including making most of the opportunities for sustainable travel provided by the Greater Cambridge Partnership’s Cambridge South East Transport scheme between Haverhill and Greater Cambridge.
 - Note the strong demand for strategic logistics distribution sites across the sub-region identified in West Suffolk’s employment evidence, and request further discussions on this.

- Acknowledge the challenges faced by West Suffolk in addressing the Climate Emergency and encourage West Suffolk to adopt ambitious climate and biodiversity policy approaches in their plan, noting approach taken within GCLP.
- request the Councils to continue to work together addressing infrastructure requirements and cross-boundary matters in the development of their Local Plans.

Bedford Borough Local Plan 2040 Plan for Submission (Regulation 19)

consultation – proposed response

17. The Bedford Borough Local Plan 2040 Plan for Submission (Regulation 19) consultation is running between 15th June – 29th July. This follows the previous Strategy Options and Draft Policies consultation held between June and September 2021. The particular reason for progression to this stage of plan-making at this time is Policy 1 in the adopted plan, which states that “an updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11 d) of the National Planning Policy Framework 2019”.
18. The Local Plan 2040: Plan for Submission and supporting documents were agreed for consultation by the Bedford Borough Council Executive in April, with a number of further evidence documents being agreed in late May. The draft version of the Plan for Submission agreed by the Council’s Executive includes content set out below relevant to Greater Cambridge. A verbal update will be provided in the meeting by which time the consultation is anticipated to have started.
19. The single substantive potential cross-boundary issue of relevance to Greater Cambridge included in the Plan for Submission approved for consultation is the proposal for a new settlement (3,800 homes) and related employment provision (4ha employment land) at Little Barford, “well connected to the new East-West Rail station at its intersection with the East Coast Main Line”. Little Barford is located south of St Neots, and south east of the intersection between the A1 and the A428. With respect to Greater Cambridge, the site is located around 5 miles west of Gamlingay and 8 miles south west of Cambourne. The settlement is on the alignment of the proposed A428 improvements which connect to Caxton Gibbet. Building on the joint Cambridge/South Cambridgeshire response to the previous Strategy Options and Draft Policies consultation, officers note that the sustainability performance and deliverability of a new settlement at Little Barford is dependent on delivery of East West Rail and on the preferred East West Rail route alignment. The preferred alignment and wider programme for delivery of East West Rail have yet to be confirmed. The Sustainability Appraisal Report supporting the Plan for Submission acknowledges the risk of the delay or non-

implementation of the planned East-West rail project, but does not identify the impacts of this eventuality.

20. Drawing on the above, the proposed response at Appendix B focuses on the following response points:

- Note proposal for new settlement at Little Barford and its reliance on East West Rail station to support travel by sustainable modes
- Note GCLP First Proposals approach to development at Cambourne, and the Councils' recognition of the need to monitor progress with the East West Rail programme and keep under review implications of any potential uncertainty around East West Rail as the plan is progressed.
- Query transport and carbon impacts of development at Little Barford should East West Rail be delayed or not delivered, including potential traffic impacts on A428 within Greater Cambridge.

Options

21. The options available to members are:

- a. Agree the proposed response to the consultations without amendments
- b. Agree the proposed response to the consultations with amendments
- c. Decide not to submit a response to the consultations – this option is not recommended as the respective plans would progress without awareness of potential impacts on Greater Cambridge

Implications

22. In the writing of this report, taking into account financial, legal, staffing, risk, equality and diversity, climate change, and any other key issues, the following implications have been considered:-

Risks/Opportunities

23. The proposed responses to neighbouring Local Plan consultations seek to prevent the risk of those plans generating negative environmental, social and economic impacts on Greater Cambridge, increasing this Council's risks in these areas, and leading to potential political and reputational damage.

Climate Change

24. Development plans provide an opportunity to address the aspects of the environment that can be influenced by the planning system. All Local Plans must be accompanied by a Sustainability Appraisal that will consider the environmental implications of the plan. The proposed responses seek to minimise negative and maximise positive environmental outcomes of these neighbouring Local Plans for Greater Cambridge. In addition, the proposed responses encourage neighbouring Local Planning Authorities to adopt the highest possible environmental standards.

Consultation responses

25. As responses to other organisations' consultations, and given the nature of issues raised, officers don't consider that there are substantive additional consultation and communication issues requiring consideration.

Alignment with Council Priority Areas

Being green to our core

26. See above comments at paragraph 24 in relation to Climate Change implications.

Background Papers

Background papers used in the preparation of this report:

East Cambridgeshire Local Plan Single Issue Review Proposed Submission

Recent consultation (3rd May - 13th June 2022):

https://www.eastcambs.gov.uk/sites/default/files/East%20Cambs%20Local%20Plan%20SIR%20-%20Reg%2019%20LP%20-%20Final_0.pdf

Cambridge City Council and South Cambridgeshire District Council
response to previous consultation:

"Thank you for consulting Cambridge City Council and South Cambridgeshire District Council. We don't consider that the East Cambs Single Issue Review has any implications for Greater Cambridge, and as such won't be making any comments to this consultation."

West Suffolk Local Plan Preferred Options

Current consultation:

https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/west-suffolk-local-plan-review.cfm

Cambridge City Council and South Cambridgeshire District Council

response to previous consultation:

<https://democracy.cambridge.gov.uk/ieListDocuments.aspx?CId=475&MId=3791&Ve r=4> (Agenda item 20/10/PnTc)

Bedford Borough Local Plan 2040 Plan for Submission

Plan for Submission and supporting documents for forthcoming consultation:

[Local Plan 2040 - Bedford Borough Council](#)

Cambridge City Council and South Cambridgeshire District Council

response to previous consultation: [Decision - Joint Response to the Bedfordshire Borough Council Draft Plan \(Regulation 18\) Strategy Options and Draft Policies Consultation \(moderngov.co.uk\)](#)

Appendices

Appendix A: West Suffolk Local Plan Preferred Options – proposed consultation response

Appendix B: Bedford Borough Local Plan 2040 Plan for Submission - proposed consultation response

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