

South
Cambridgeshire
District Council

Report to:	Cabinet 12 March 2024		
Lead Cabinet Member:	Cllr Dr Tumi Hawkins – Lead Member for Planning		
Lead Officer:	Stephen Kelly, Joint Director of Planning and Economic Development		
Key Decision:	No		

Greater Cambridge Plan-making Timetable

Executive Summary

- 1. This report provides an update regarding the Local Plan Timetable (previously called the Local Development Scheme (LDS)), which is a timetable for the production of new or revised development plan documents that set out the planning policy framework for Greater Cambridge. It is prepared jointly between South Cambridgeshire District Council and Cambridge City Council as the plans in preparation are both joint plans for the authorities combined area. The Councils are required to keep the Timetable up to date.
- 2. The latest LDS was agreed by the Councils in 2022. However, continuing uncertainties regarding key external dependencies for the emerging Greater Cambridge Local Plan (GCLP) in particular relating to water availability and transport strategy, and more recently the Government's programme for Greater Cambridge have meant that the timetable expectations agreed in 2022 cannot now be met. Officers recommend an indicative revised timetable for preparing the GCLP under the new plan-making system, which would achieve Gateway 1, the start of the formal 30-month process, by autumn/winter 2025.
- 3. The report also provides an update in respect of the timetable for the North East Cambridge Area Action Plan (NECAAP). In particular, this takes account of the latest timetable for the Cambridge Waste Water Treatment Plant (CWWTP) Development Consent Order (DCO) process seeking to relocate the CWWTP to Honey Hill, given both the NECAAP and the GCLP preferred option strategy are predicated on the relocation taking place. The future of the NECAAP will be kept under review once timings are clearer and taking into account the implications of, and options provided by, the new plan making system. This will be done in the context of seeking to provide a clear planning framework for this key strategic site as soon as possible.

Recommendations

- 4. It is recommended that Cabinet agrees that:
 - a) The Local Plan Timetable Update at Appendix 1 be added as an Addendum to the Greater Cambridge Development Scheme 2022 and published on the Greater Cambridge Planning website.

- b) the Lead Member for Planning at South Cambridgeshire District Council writes to DLUHC, together with the Executive Councillor for Planning, Building Control and Infrastructure at Cambridge City Council, providing an update on the plan making timetable for Greater Cambridge reflecting the contents of this report.
- c) the Greater Cambridge local planning authorities should explore further with Government the opportunity to be a 'front-runner' pilot for the new planmaking process.
- d) Agree that a further report with a proposed specific timetable for both plans be brought to Members when there is clarity on the external dependencies of water, transport the WWTP DCO and the new plan-making system.

Details

Background: Local Plan Timetable

5. The Local Plan Timetable (previously called the Local Development Scheme (LDS), a change made by the Levelling Up and Regeneration Act 2023) identifies the expected timings for the production of new or revised documents that set out the planning policy framework for Greater Cambridge. The Councils are required to keep the timetable up to date. In a Written Ministerial Statement by Michael Gove in December 2023, all Councils were requested to provide updates on their timetables to the Department for Levelling Up, Homes and Communities (DLUHC). The latest timetable was agreed by the Councils in 2022. That document listed the below expected future timings for the emerging Greater Cambridge Local Plan (GCLP) and North East Cambridge Area Action Plan (NECAAP), both being prepared jointly between South Cambridgeshire District Council and Cambridge City Council. These timings are now out of date or cannot be met and will need to be updated once there is sufficient certainty to identify revised programmes. This report proposes an Addendum to the LDS as contained at Appendix 1 setting out an updated indicative timetable for the GCLP and position on the NECAAP.

Table 1: Plan-making stages as set out in the adopted LDS 2022

Plan	Draft Plan	Proposed Submission	Submission
	stage	consultation	to
			government
GCLP	Autumn/Winter 2023	Autumn 2024 Note: to follow the outcome of CWWTP DCO	Summer/Autumn 2025 Note: subject to the outcome of CWWTP DCO
NECAAP	Summer 2020 (completed)	Autumn 2024	Summer/Autumn 2025
		Note: Proposed Submission plan agreed in January 2022 for consultation to follow the outcome of CWWTP DCO	Note: subject to the outcome of CWWTP DCO

Key dependencies for determining a future GCLP timetable

6. The primary external determinants of the future GCLP timetable centre upon water availability, the transport strategy, the CWWTP DCO and the new national plan-making system. The Government has also made a number of statements promoting much higher growth levels for Cambridge than in the emerging Joint Local Plan. The Cambridge 2040 initiative may also have implications for the local plan timetable that are unresolved at this time. These are all considered below.

Water supply

- 7. Water supply has become an increasingly significant issue for planning in Greater Cambridge in recent months. Development needs in the adopted Local Plans were met by Cambridge Water's current Water Resources Management Plan (WRMP) adopted in 2019. Concerns regarding the impact of water abstraction levels on the health of water courses were identified in the Councils' Integrated Water Management Study, firstly as part of the assessment of strategic spatial options considered for the new GCLP (2020) and then as part of the Outline Water Cycle Study (2021) which provided part of the evidence base for the level of development needs identified at the time of the First Proposals. The study anticipated that the new Regional Water Plan and Cambridge Water's detailed Water Resource Management Plan would provide clarity on the water supply position. The outcome of the WRMP process is still awaited. In the meantime, concerns about the adequacy of the water supply and impacts on the environment, linked to the impacts of climate change, led to the Environment Agency objecting to a number of large-scale planning applications, including those in the adopted local plans, and raising objections to the emerging WRMP 2024. This has created delays in delivery of sites that have been identified to meet the development needs for homes and jobs in the area. The seriousness of the issue was highlighted by Council Leaders in letters to government Ministers, urging them to take steps to resolve the issues.
- 8. Government has established a Cambridge Water Scarcity Group that brings together relevant government departments and other stakeholders, including local authority officers. In his speech in July 2023, the Secretary of State, Michael Gove MP, described the purpose of the group as being 'to identify and accelerate plans to address water constraints'. It went on to say that 'The Group will include all relevant partners to understand what it would take to accelerate building the proposed new Fens Reservoir and enabling Cambridge to reach its economic potential'. About £9m has been identified by government to address the water supply issues. A range of actions are being developed by the group focusing on bringing forward supply options, reducing demand through efficiency measures in new and existing buildings, and measures to improve the resilience of our watercourses.
- 9. Whilst these are positive steps, this work is at an early stage. The statutory process for agreeing Cambridge Water's WRMP 2024 has continued to be delayed. On the advice of the Environment Agency, Defra has requested that further information is provided by Cambridge Water and they submit a revised WRMP by the end of February 2024. It is not yet clear when, and on what basis, a final decision will be made.
- 10. We have set out at each plan making stage the need for confirmation that a sustainable water supply is available to support development needs. We do not yet know the outcome in terms of water availability to inform the new local plan and in particular how much development can be planned for based upon available water supplies and whether or not this would meet our objectively assessed need for jobs and homes in full (subject

also to other planning considerations including deliverability). We continue to engage with the Environment Agency, Cambridge Water, central government and other relevant stakeholders to seek to understand the evolving position. As soon as there is clarity on water supply, our consultants will update our Water Cycle Study to understand the number of jobs and homes that can be supported by a sustainable water supply throughout the plan period as new water infrastructure comes forward, in particular the planned water transfer anticipated in 2032 and new Fens Reservoir around 2036, and in the context of further future planned reductions in water abstraction licences.

Transport Strategy

- 11. To ensure an appropriate development strategy in the GCLP, it is important that it is integrated with a Transport Strategy that ensures development can happen without significant adverse transport impacts as well as ensuring that the plan addresses the challenges of climate change and local environmental impacts and that the development strategy is supported by sustainable travel options.
- 12. Transport modelling of previous stages of plan-making reflected the transport strategy contained in both the County Council's former Transport Strategy for the Cambridge area and the Cambridgeshire and Peterborough Combined Authority (CPCA) Local Transport and Connectivity Plan. The earlier GCLP proposals therefore included an assumption regarding traffic reductions in the Cambridge urban area, but did not assume any particular scheme. This was to be delivered by the Greater Cambridge Partnership's (GCP) City Access proposals. Assumptions were also made about the role of the transport corridors and their impact on traffic movement alongside other planned infrastructure schemes including all the GCP radial public transport schemes.
- 13. The recent decision by the GCP Board not to take forward the Making Connections proposal as part of the wider City Access programme, and to pause the Cambridge South East Transport Scheme (CSETS) due to rising programme costs, means that further work is underway, including additional transport modelling, to consider the implications of this decision upon the assumptions contained within the earlier agreed transport strategies.
- 14. Once there is greater clarity, discussions will be required with the Combined Authority, the County Council and GCP to seek to understand what alternative proposals to enable more reliable journeys into and around the city might look like and what their impact may be, with the goal of identifying a transport strategy and its implications that could support the emerging GCLP whilst addressing wider climate, air quality, and place objectives. At this stage it is not clear how quickly this matter will be resolved.

Government's planning reforms

- 15. It is expected that by Autumn 2024 Government will make changes to how local plans are prepared, including the contents of plans, how they are consulted on, and the process that needs to be undertaken, with the overall aim of streamlining plan-making. Key proposed changes include:
 - a) the formal stages of a local plan review are expected to be completed within 30 months;
 - b) the formal process involves two public consultations, the first to test the emerging plan and the second on the draft plan itself, and three Gateway

- reviews designed to allow independent review of an authority's plan-making process to reduce risk further down the line;
- c) the proposal to create National Development Management policies;
- d) the first cohort of "front runner" plans under the new system could start in autumn 2024, with remaining authorities grouped into sequential 6-month plan-making commencement windows ("waves");
- e) whilst the intention is for there to be a single local plan for an area, new supplementary plans are to be introduced to respond to opportunities for specific sites quickly and positively outside of, and potentially ahead of, the local plan process, that would have the same weight as a local plan; and
- f) Plans seeking to be adopted under the current system will need to be submitted by 30 June 2025 and adopted by 31 December 2026.
- 16. The Councils responded to the Government's consultation on these proposed changes in autumn 2023, which relate to wider changes to the planning system that will take place via the implementation of the Levelling Up and Regeneration Act 2023. The transitional arrangements to the new system provide for emerging local plans to progress under the current plan-making system if they are submitted for independent public examination by end of June 2025. Given the external dependencies addressed in this report, including the CWWTP relocation DCO where a decision is not now anticipated until autumn 2024 (see below), it is not possible to set a realistic timetable that would enable the GCLP to meet the currently stated deadline for submission under the current system, even if the programme were to be compressed. As such the GCLP is now expected to need to be prepared under the new plan-making system, as discussed later in this report.

North East Cambridge Area - Cambridge Waste Water Treatment Plant relocation

- 17. Effective and efficient development of the North East Cambridge site is dependent on the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) via a separate Development Consent Order (DCO) process that Anglian Water is undertaking. Publication of the Proposed Submission version of the GCLP is dependent on the outcome of the DCO process; this is the same for the NECAAP, noting that the Councils agreed in January 2022 a Proposed Submission NECAAP for future public consultation, contingent upon the separate Development Control Order being undertaken by Anglian Water for the relocation of the Waste Water Treatment Plant being approved.
- 18. At the time of the earlier timetable's agreement, officers were expecting the DCO to be submitted by Anglian Water in Autumn 2022. The DCO was submitted in April 2023. The DCO Examination process is ongoing with a decision expected by the end of 2024, albeit this date could be affected by a general election. A number of land parcels within the NEC area are already coming forward with planning applications ahead of the NECAAP or GCLP. Delivery of larger scale individual development parcels within North East Cambridge also remain subject to resolution of the water issue outlined above. The future of the NECAAP will be

kept under review once timings are clearer and taking into account the implications of, and options provided by, the new plan making system and including taking into account the other issues raised in this report. This will be done in the context of seeking to provide a clear planning framework for this key strategic site as soon as possible.

Cambridge 2040/Cambridge Delivery Group

- 19. In Summer 2023, the Government announced its intention to significantly increase levels of development in Cambridge beyond the levels outlined in the First Proposals. It has established a "Cambridge Delivery Group" to progress that ambition. Peter Freeman, the Chair of Homes England, has been appointed to lead that programme and the Group have subsequently commissioned a number of studies. Engagement with Peter Freeman and the team of civil servants tasked with bringing forward the Government's proposals has been ongoing since that time. As referred to in the Water Supply section, in the autumn of 2023, the Government also established a "Water Scarcity Group" with dedicated funding to explore the particular challenges associated with water scarcity that impact the area's current and potential future growth.
- 20. Senior officers and the Leaders of the Councils are in regular dialogue with the project team to seek to understand how and in what way the Government's ambitions will interact with, and impact on, the Local Plan process. The continued requirement in the NPPF that the local plan is "justified," means that the plan and strategy will need to be tested against and supported by evidence. If brought forward, government's ambitions for a significant quantum of additional new homes and jobs would be expected to impact upon the conclusions drawn in the evidential studies and modelling that the Councils have already prepared, as are required to support the progression and examination of their joint Local Plan. Given the current uncertainty over when the specific form of Government's Cambridge 2040 ambitions will be known, officers are not at present able to determine what the impact of this national project on the local plan preparation timetable will be.

Additional factors that could affect the future programme

21. Other uncertainties that could affect the Local Plan Timetable include confirmation of the development opportunity around the proposed Cambourne station associated with East West Rail, and the forthcoming general election.

What this all means for the GCLP Timetable

22. In the context of ongoing uncertainties in relation to water supply, transport strategy, the new plan-making system and Government's Cambridge 2040 proposals, one thing that has become clear is that it will not be possible to progress the GCLP under the current plan-making system if the cut-off date for

the transitional arrangements remains as end of June 2025. Officers are therefore exploring with government the potential for being a "front runner" for the new planning process, including the potential merits and opportunities it could bring and in order to minimise any further delay to the emerging GCLP. These include the new system including a prescribed period for plan making and examination that has the potential to ensure a much more expedient process than the Councils experienced for the 2018 Local Plans. It seems reasonable to assume that adoption of the GCLP under the new system would likely be similar to that if the Councils were able to progress under the current system, and potentially earlier.

23. As a part of engagement with DLUCH on this topic, officers continue to seek further clarity as to how work completed to date on the emerging GCLP could be adapted to meet the requirements of the new system. It is understood that Government will publish new regulations and guidance for the new plan-making system in autumn 2024. Until such time as we have clarity on the specific requirements of the new system it is difficult to set a specific detailed local plan timetable. However, it is not unreasonable to say that an indicative timetable for a local plan under the new system, on the basis of current understanding, is to achieve Gateway 1, the start of the formal 30-month process, by autumn/winter 2025. The new plan-making process and the Government's prescribed timeline for their preparation is included as Figure 1 below. Once there is more clarity on the full range of current external uncertainties, including details of the new plan-making process and whether the Councils are accepted as front-runners, officers will be able to bring a more specific timetable for the full plan-making process to Members.

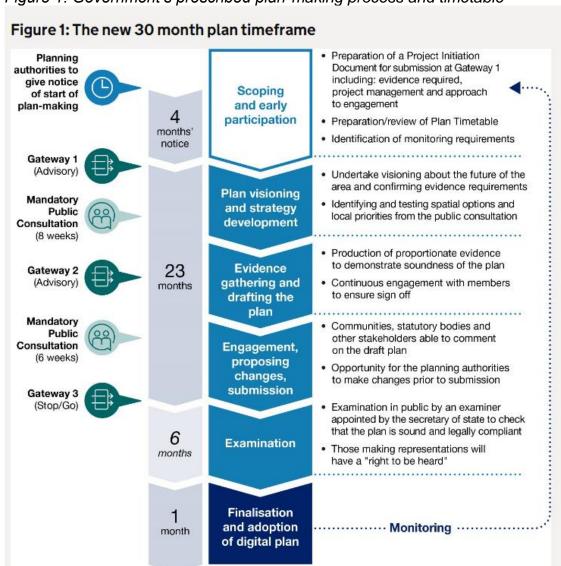


Figure 1: Government's prescribed plan-making process and timetable

Conclusion: next steps

24. In summary, ongoing uncertainty regarding a range of key external determinants that are not within the control of the Councils mean that it is only possible at the present time to provide an indicative revised timetable for the GCLP as set out at paragraph 23. The NECAAP will be kept under review as set out at paragraph 18. Officers are continuing to develop elements of planning policy that are not contingent on these external matters and to monitor closely the progress being made on the matters above. The indicative timetable is therefore to look to transition the GCLP into the new plan-making system with the formal stages starting by autumn/winter 2025. Officers will bring specific timetables for the plans at the earliest opportunity once the external uncertainties are resolved. In line with the Written Ministerial Statement requirements, we will also respond to the requirement for a timetable on the basis of the terms set out in this report. As

such, an Addendum to the 2022 LDS is proposed, and the Local Plan webpages will be updated to reflect this report.

Reasons for Recommendations

25. Given the remaining uncertainties regarding key determinants for GCLP and NECAAP, officers consider that it is only possible to confirm an indicative timetable for the GCLP process.

Options

26. There are no options to be considered as it is only possible to provide an indicative Local Plan Timetable at this time.

Implications

27. 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:-

Financial and Fraud Risk

28. The Shared Planning Service programme for the Local Plan is being jointly funded by Cambridge City Council and South Cambridgeshire District Council. The impact of some of the issues identified in this report were not explicitly anticipated at the time that the original budget for the Local Plans were set. Nevertheless, the service has to date managed its costs within the existing budget envelope. Some additional funding has already been identified by the Government to support engagement with the Council on its ambitions for growth. The Shared Planning Service is in ongoing discussions around how that additional funding might be secured. In the event of significant additional work being required as a result of the wider issues identified above, the service will need to review the available budget for the Local Plan against its other ongoing priorities.

Legal

29. There are no legal implications arising from the report.

Staffing

30. There are no immediate staffing implications from this report. Delivery of the plans proposed is based upon assumptions about the staff resources required. In the event of significant additional staff resources being required, to deliver the plans proposed, the service will need to review its available staff resources against wider programme priorities. See also paragraph 28, Financial and Fraud Risk above.

Risks/Opportunities

31. Providing an indicative timetable for the new plan ensures that the Councils comply with the national requirement to keep the local Plan timetable up to date. More detailed plan-making timetables will be prepared once there is greater

certainty regarding the issues explored in this report to limit the risk of submitting undeliverable plans that would likely be found unsound, and the associated risks of the plans generating adverse environmental and social impacts. However it is recognised that continued delay in the preparation of the plans adds to the risk that significant development proposals will come forward ahead of the adoption of a new comprehensive local planning policy framework. To manage that risk, officers will continue to identify, propose and develop interim policy measures. These risks are included on the Council's corporate risk register. Paragraphs 7-10 relate particularly to corporate risk SR21 failure to deliver partnership working to deliver infrastructure resulting in impacts to the councils adopted local plan and SR23 Ability to deliver Local Plan due to limitations on water and utilities. These same paragraphs also refer to mitigation actions being taken to address these risks. Officers will keep these risks under review as the plans progress.

Equality and Diversity

32. There is no decision to be made as part of this report in relation to the content of emerging development plans. The development plans will each be subject to Equalities Impact Assessment at each stage during their development.

Climate Change

33. There is no decision to be made as part of this report in relation to the content of emerging development plans. Notwithstanding, development plans provide an opportunity to address the aspects of the environment that can be influenced by the planning system. These aspects will be considered by a range of evidence including via a Sustainability Appraisal as the plans are prepared. One of the big themes for the Greater Cambridge Local Plan identified in The First Proposals is climate change. Evidence has been produced to inform the plan, including a study on how the plan can assist with the journey towards net zero carbon.

Health and Wellbeing

34. There is no decision to be made as part of this report in relation to the content of emerging development plans. Notwithstanding, the vision and policies of both the GCLP and NECAAP seek to support wellbeing and social inclusion.

Consultation responses

35. Consultation and engagement are a key element of the plan making. Future stages of the Local Plan and NECAAP, whenever they take place, will involve consultations meeting the Councils' Statement of Community Involvement.

Alignment with Council Priority Areas

Growing local businesses and economies

36. There is no decision to be made as part of this report in relation to the content of emerging development plans. Notwithstanding, the vision and policies of both the GCLP and NECAAP seek to support local businesses and economies.

Housing that is truly affordable for everyone to live in

37. There is no decision to be made as part of this report in relation to the content of emerging development plans. Notwithstanding, the vision and policies of both the GCLP and NECAAP seek to support provision of a range of affordable housing.

Being green to our core

38. There is no decision to be made as part of this report in relation to the content of emerging development plans. Notwithstanding, the vision and policies of both the GCLP and NECAAP seek to support the Council's net zero carbon and doubling nature aspirations.

A modern and caring Council

39. There is no decision to be made as part of this report in relation to the content of emerging development plans. Notwithstanding, the vision and policies of both the GCLP and NECAAP seek to support wellbeing and social inclusion for all.

Background Papers

- Greater Cambridge Local Development Scheme (greatercambridgeplanning.org), August 2022
- Greater Cambridge First Proposals consultation commentary regarding water availability, November 2021
- Greater Cambridge Partnership Executive Board papers, 28 September 2023
- Long-term plan for housing: Secretary of State's speech GOV.UK (www.gov.uk)
- <u>Joint statement from local leaders and the Combined Authority Mayor on</u>
 <u>Cambridge 2040 announcement Cambridge City Council</u>, 19 December 2023
- <u>Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms GOV.UK (www.gov.uk)</u>
- Government response to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation GOV.UK (www.gov.uk)

- Agenda for Cabinet on Thursday, 28 September 2023, 10.00 a.m. (moderngov.co.uk), includes Response to Consultation on Plan-making reforms implementation
- <u>Decision Response to Consultation on Plan-making reforms Implementation</u> (<u>moderngov.co.uk</u>), 7 October 2023

Appendices

Appendix 1: Local Plan Timetable Update - Addendum to the Greater Cambridge Development Scheme 2022

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