

Appendix 1

Cambridge City Council

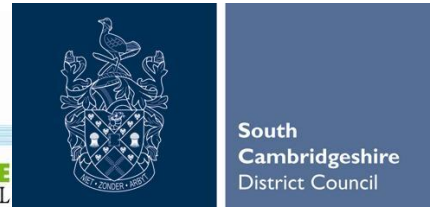
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22 February 2017

Dear Richard,

East Cambridgeshire Local Plan Further Draft and Duty to Co-operate

Thank you for the invitation to respond to the second of three consultations on the East Cambridgeshire Local Plan: the 'Further Draft – January 2017', and whether the Duty to co-operate requirements have been fulfilled.

Objectively Assessed Need for Homes

The Councils note the housing requirement of 11,400 dwellings for East Cambridgeshire between 2014 and 2036, and the continued use of the Memorandum of Co-operation for the redistribution of need within the Housing Market Area. The Councils also recognise that the 'East Cambridgeshire Objectively Assessed Housing Need – October 2016' report refers to the evidence base documents prepared for the Cambridge Housing Market Area in 2013 as relevant to the setting of housing need, and that the calculation of the objectively assessed need for East Cambridgeshire builds upon this existing evidence and recognises the functional operation of the Housing Market Area.

Duty to Co-operate and Strategic Issues

There are matters in the 'Local Plan – Further Draft' that have the potential to fall under the Duty to Co-operate definition of a strategic matter. The development strategy proposed for East Cambridgeshire and its potential impacts on infrastructure may comprise a strategic matter, especially in combination with the development strategy for Greater Cambridge, as there are likely to be impacts on transport infrastructure across more than one planning authority area. The development strategy proposed for East Cambridgeshire includes proposed allocations with a capacity of over 5,600 dwellings at Ely and Littleport, both on the A10. These two settlements will be providing over half of the growth proposed in the district, and when considered cumulatively with the development strategy for Greater Cambridge that also proposes significant development on the A10 at Waterbeach and Cambridge Northern Fringe East, there are likely to be significant impacts on the A10.

In our letter dated 24 March 2016 responding to the consultation on the 'East Cambridgeshire Local Plan: Preliminary Draft – February 2016', the Councils highlighted that East Cambridgeshire District Council's decision on the distribution of growth, when considered cumulatively with the development strategy for Greater Cambridge, could have potential impacts on the A10 that could amount to a strategic matter, and therefore that there was a need for the Councils to work closely together to ensure that any impacts could be acceptably mitigated.

In the 'Further Draft – January 2017' and its supporting documents, it is not clear how East Cambridgeshire District Council has considered and responded to the concerns that the Councils outlined last year highlighting this matter. Our records do not show that East Cambridgeshire District Council has initiated any officer level discussions with the Councils under the Duty to Co-operate relating to this potential strategic matter since the consultation on the 'Preliminary Draft – February 2016'.

The Councils approached relevant officers at East Cambridgeshire District Council in 2015 and 2016 to be part of the A10 Corridor Transport Study that is currently being prepared. This study is being funded by developers, Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council and being undertaken by Mott MacDonald to develop transport options for the A10 corridor and provide clarity on any mitigation measures that will be needed. The Councils are not aware of any other meetings outside of the A10 work related to the Duty to Co-operate.

The Councils note that the site assessments (included in the 'Site Assessment Evidence Report – January 2017') for each of the sites considered in Ely and Littleport record that Cambridgeshire County Council has highlighted concerns that the impact of all the identified sites in these settlements could have a significant cumulative impact on transport infrastructure. The County Council's comments also state that should significant development across a number of sites be proposed then a cumulative impact assessment will need to be undertaken to demonstrate that any significant cumulative impacts can be satisfactorily mitigated.

The 'East Cambridgeshire Growth Study – January 2017' identifies the draft Transport Strategy for East Cambridgeshire (February 2016) as a relevant consideration in developing the alternative growth strategy options. We note that the draft Transport Strategy for East Cambridgeshire (February 2016) was developed based on the growth strategy included in the adopted East Cambridgeshire Local Plan (2015) rather than the proposed growth strategy in the 'Further Draft – January 2017'. In relation to the

A10, the proposed growth strategy in the 'Further Draft – January 2017', compared with the adopted 2015 Local Plan strategy, includes significant additional proposed allocations at Littleport, and amendments are proposed to the adopted allocations at Ely. Cambridgeshire County Council as the Highways Authority will advise whether a cumulative impact assessment is needed and that will inform the Councils' view at subsequent stages of the Plan.

The Councils appreciate East Cambridgeshire District Council's need to facilitate growth in its district through its proposed growth strategy and accompanying proposed allocations. However, the Councils would welcome further engagement to ensure that the proposed development strategies for Greater Cambridge and East Cambridgeshire, and their cumulative impacts on the A10 and any other transport infrastructure, can be acceptably mitigated. Any discussions should include East Cambridgeshire District Council, South Cambridgeshire District Council, Cambridge City Council and Cambridgeshire County Council. The Councils do not consider that it is necessary to prepare a joint Local Plan to address this matter.

Other Issues

The Councils also have the following detailed comments on the 'East Cambridgeshire Local Plan: Further Draft – January 2017':

The longstanding purposes of the Cambridge Green Belt are consistent between Cambridge and South Cambridgeshire, and should also be consistent in East Cambridgeshire. We therefore propose that the Green Belt purposes set out in the second sentence of paragraph 3.9.2 should be amended as follows: "The purposes of the Cambridge Green Belt are to: preserve the unique character of Cambridge as a compact, **dynamic** city with a thriving historic centre; maintain and enhance the quality of Cambridge's setting; and prevent communities in the environs of Cambridge from merging into one another and with the city."

The Councils look forward to hearing from you to progress matters.

Yours sincerely

Sara Saunders

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