

Report to: Joint Local Planning Advisory
Group (JLPAG)

2 June 2020

Lead Members: Lead Cabinet member for Planning (SCDC) Cllr Tumi Hawkins
Executive Councillor, Planning and
Open Spaces (Cambridge) – Cllr Katie Thornburrow

Lead Officer: Stephen Kelly, Joint Director for Planning and Economic
Development

Greater Cambridge Local Plan: Issues & Options Feedback and next Steps

Executive Summary

1. This report seeks to feedback on the Greater Cambridge Local Plan Issues and Options consultation – ‘The First Conversation’. This forms part of the early stages in preparing the next Local Plan for the area, being prepared jointly by Cambridge City Council and South Cambridgeshire District Council.
2. The report provides an overview of the consultation activities, how many people they reached and how many comments were received, confirming that the consultation reached a large number of people. While we are still processing and collating feedback and comments received from the consultation, but this report provides some high level information on some of the key questions asked. It then seeks to explore emerging lessons learned from the consultation, in terms of what went well, and what could be improved for future consultations.
3. The report also sets out the next steps for evidence preparation, including providing an update on the evidence commissioned to support plan making.
4. The report then explores the next steps for the preparation of the Local Plan. It considers:
 - Reasons to review the process and timetable
 - Approach to future plan making stages and engagement
 - Proposed changes to the timetable

5. A separate report on the agenda for this JLPAG meeting addresses updates to the Local Development Scheme, for both the Local Plan and the North East Cambridge Area Action Plan.

Key Decision

6. Yes

This is a key decision for both Cambridge City Council and South Cambridgeshire District Council. The Item is included in the Forward Plans for

- Cambridge City Council Planning & Transport Scrutiny Committee 30 June 2020
- South Cambridgeshire Cabinet 29 June 2020

Recommendations

7. The Joint Local Planning Advisory Group (JLPAG) is recommended to:
 - (a) Recommend to the respective Council's decision-making processes that they should:
 - i. Note the report on Initial Feedback from the First Conversation consultation included at Appendix 1
 - ii. Agree additional informal member and stakeholder engagement and Preferred Options stages be added to the Local Plan making process
 - iii. Agree the approach to addressing the Duty to Cooperate included as Appendix 3 to this report, subject to any material changes necessary as a result of consultation with Duty to Cooperate bodies.

Reasons for Recommendations

8. Cambridge City Council and South Cambridgeshire District Council are preparing a joint Greater Cambridge Local Plan.
9. Having considered early results of the Issues & Options consultation and a range of other considerations as set out in this report, it is proposed that a revised process to preparing the Local Plan is necessary and appropriate to enable evidence to be fully developed and to ensure positive and effective engagement with stakeholders and communities as the preferred approach to the new Local Plan is developed.
10. JLPAG members are invited to note the initial findings of the Issues and Options consultation, and to comment on the recommended changes to the stages of plan making and implications for the timetable. Recommendations from JLPAG will be communicated to each Council's separate democratic processes for discussion and formal agreement.

Details

Background: The Greater Cambridge Local Plan

11. Through the City Deal with Government in June 2014, Cambridge City Council and South Cambridgeshire District Council committed to develop a joint Local Plan for the Greater Cambridge area.
12. Both councils adopted their current Local Plans in 2018. Both plans include a shared policy commitment to produce a joint Local Plan via an early review of those plans, in particular to update the assessment of housing needs, review the progress of delivering planned developments (in particular the new settlements at Waterbeach and Bourn Airfield), and consider the needs of caravan dwellers and government changes to the approach to planning for Gypsies and Travellers. A Greater Cambridge Local Development Scheme was adopted in October 2018.
13. The engagement process for the new plan started last year with an independent Lessons Learned and Good Practice review, engaging with key stakeholders via structured discussions looking back at the previous Cambridge and South Cambridgeshire Local Plans in terms of processes and outcomes. In addition, in July and September 2019, Greater Cambridge Shared Planning Service held a series of Local Plan workshops across South Cambridgeshire and Cambridge.
14. This early engagement informed preparation on an issues and options public consultation, run for six weeks in January and February 2020. The 'First Conversation' consultation explored important issues that will influence how the Local Plan is developed, giving people the opportunity to inform and shape its direction before it is drafted.

The First Conversation – Initial findings

15. Through the use of a variety of consultation channels, and using a digital-first approach, the First Conversation consultation reached a large number of people. We are still inputting comments received via email to the database and a full report with in-depth analysis will be made available when this process is complete. Appendix 1 to this report provides an initial overview of the reach of the consultation and the feedback received.
16. A large volume of responses and comments were received from a range of sources, both through the Councils website, via email, social media, and at our roadshow events. In addition, over 300 people attended the Big Debate at the Corn Exchange in Cambridge.

17. The First Conversation included seven 'big themes' grouped into two sets – those which were considered to cover the 'how' of the Local Plan (Climate Change, Biodiversity and Green Spaces, Wellbeing and Inequality and Great Places) and those which were considered to cover the 'what' of the Plan (Jobs, Homes and Infrastructure).
18. On the big themes, the majority of respondents supported the approach. There were a wide range of views on how the themes should be ranked. The where to build question also divided opinion, with densification of existing urban areas coming out as most preferred, but some support for all the choices stated.
19. When the Councils started the plan making process they set out with an aim to put community engagement at the heart of the process. A range of new measures we put in place, and ideas for consultation tested, seeking to take an innovative and engaging approach to consultation. This has widened the reach of the consultation and resulted in a broader level of engagement.
20. Having tried new ways of engaging with people it is important that we consider lessons learned. Appendix 1 includes a review of what worked well, and whether there is still room for improvement. We receive positive feedback on our use of graphic and plain English approach, but some considered we could do more to present often complex information. Our new website attracted a lot of interest, and we are looking at how we can further improve the user journey.
21. We will consider how we can apply these lessons learned to future consultations. This includes for the upcoming North East Cambridge Area Action Plan consultation.

Approach to Call for Sites Submissions

22. The Government requires local planning authorities to conduct a 'call for sites' exercise as a key component of the Strategic Housing and Economic Land Availability Assessment to inform policies in the new Local Plan for housing, employment and other uses. The Councils carried out a 'Call for Sites' consultation in Spring 2019. The opportunity to submit further sites was then included in the 'First Conversation' consultation. The consultation also included an opportunity to submit sites for Green spaces, reflecting that one of our big themes was 'Biodiversity and Green Spaces'.
23. It is planned to publish the full list of sites on the Councils' local plan website in the summer once the new sites received through the First Conversation consultation have been processed.
24. It is important to stress that the site submissions will have no planning status at this stage. They will be subject to assessment of their planning merits and consideration of how well they fit with emerging preferred development strategy in due course before sites proposed to be allocated in the plan are identified for consultation. We will engage with local members, parish councils and residents

associations before the lists are published to ensure a full understanding of how these sites are being considered.

Developing the Evidence Base

25. The Councils are gathering the appropriate level of evidence to inform the preparation of the Local Plan, as required by national policy. The First Conversation consultation included a list of topics where further research would be commissioned. Many studies are commissioned from external consultants who have a particular expertise on a topic or issue. Significant progress has now been made on procuring key studies. A list of the studies, and who will be undertaking them is included in Appendix 2 of this report. This list will also be maintained on the Local Plan website.

Reasons to review the process and timetable

26. The Councils must keep up to date a statement of the statutory development plans they are preparing and the timetable for them. The commitment to preparing the Greater Cambridge Local Plan is included in the Greater Cambridge Local Development Scheme (LDS), which was adopted in October 2018 (with limited update in November 2019 to reflect the actual start date for Issues and Options consultation). It included the timetable and key public stages proposed for the preparation of the Local Plan that has been intended up to now. The document makes clear that the LDS will be updated or reviewed where the need to do so is identified.

27. Since the preparation of the timetable in 2018 a range of issues have arisen which need to be considered when programming the remaining stages of the plan making process:

- The Councils' declaration of a Climate Emergency and Biodiversity Emergency, and the complexity of these issues for plan making;
- Lessons Learned and Good Practice review (September 2019), including the recommendation to front-load the plan making process;
- Experience from the 'First Consultation' consultation and a desire by members for an inclusive and engaging plan making process before the local plan is drafted;
- Findings from other Councils "failed" Local Plan process around the country, and the need to front load and develop a comprehensive evidence base and to ensure that reasonable options have been properly tested and understood before a preferred development strategy is identified (this is not something that can be retrofitted to a plan later in the process so must be properly undertaken in the early stages);
- The increased obligation created by the legal Duty to Cooperate requirements; particularly given the significant role that Greater Cambridge plays in the wider geography, including the Combined Authority area and the OxCam Arc. Also, there is growing evidence of

planning inspectors' approach to testing compliance with the Duty at examinations elsewhere in the country – this legal compliance issue is tested on the first day of the public examination and any shortcomings cannot be addressed retrospectively.

- The publication of the Cambridgeshire and Peterborough Independent Economic Review (CPIER) and the role it sees for Greater Cambridge in the ambitions of the Combined Authority to double GVA in Cambridgeshire and Peterborough;
- The HIF funding announcement for North East Cambridge and implications of the Development Control Order (DCO) process in demonstrating the delivery of this major brownfield site, already allocated for development in the adopted Local Plans 2018.
- Emergence and timing of major infrastructure proposals like CAM and East West Rail and the role these could play in the development strategy for the area;
- New government requirements from the NPPF 2019 for plan making;
- Impact of Covid19 including delays to some evidence base preparation requiring surveys and the postponement of Cambridge City Council elections.

28. All these factors have led officers to the view that a proposed change to the key stages in preparing the new Local Plan and the timetable for that should be put to members for consideration.

Changes to the plan making process

29. The current adopted Local Development Scheme envisaged the next public stage would be consultation on a draft Local Plan (still at the regulation 18 issues and options stage). However, there is a clear desire from the Councils and key stakeholders to have an inclusive and engaging plan making process, and also reflecting on the changing context above, it is recommended to now include the following additional stages of plan making. This is to ensure there is time to properly develop the robust evidence base, carry out the necessary identification and testing of options and assess their respective impacts, and enable comprehensive engagement in plan making that addresses the complex challenges facing the Cambridge area before the draft Local Plan itself is drafted for consultation.

- **Additional informal Member and stakeholder engagement (Autumn 2020)** – An opportunity to feedback, and seek views on, key findings of the range of evidence that has been commissioned (e.g. Climate change, green infrastructure, water, transport, jobs and homes), the findings of the Sustainability Appraisal of strategic options, and what these mean for the strategy choices available. This would not be a full public consultation but a targeted stakeholder engagement, similar to the one carried out in summer 2019 that helped inform the First Conversation consultation. This would reflect the Councils' desire for engagement and transparency in the process of developing the preferred strategy for the new Local Plan. This stage would include:

- Joint Local Planning Advisory Group meeting in October 2020 to receive a report publishing key findings from the evidence work and testing of options, and the outcomes of the assessment of a range of growth levels and spatial strategy options.
 - Stakeholder engagement workshops in November/December 2020 with a range of stakeholders, including: members, parish councils and residents associations, statutory consultees and key interest groups, landowners, developers and planning agents, and businesses. Duty to cooperate meetings would also take place at this time (see separate section below).
- **Additional stage of Public Consultation on Preferred Options (Summer/Autumn 2021)** - an additional stage is proposed to enable public consultation on the emerging preferred approach to be taken by the Local Plan to key strategic issues, and for those views to be considered before detailed policies are drafted. It would include an explanation of the options tested and how they have been assessed to identify proposed preferred options. It will allow the emerging preferred approach to be tested with the public and wider interests prior to confirming the preferred strategy for the new Local Plan and the drafting of detailed policy wording in a full draft Local Plan. The Preferred Options would include:
 - proposed levels of development of jobs and homes
 - the preferred spatial development strategy
 - specific site allocations
 - the preferred approach for key policy topics for the plan (potentially those that will be defined as the strategic policies in the plan) such as climate change targets and requirements on development to address climate impacts, affordable housing thresholds, approach to development in villages, etc.
 - Other options considered but not taken forward and reasons why they are proposed to be rejected.

Relationship with North East Cambridge

30. As well as the Local Plan, the Councils are jointly preparing an Area Action Plan for North East Cambridge (see separate report on this agenda). The timing of the AAP has the potential to impact on the timetable for the later stages of the Local Plan preparation process, depending on the strategy of the Local Plan. This is explored in detail in the separate report to this meeting on the Local Development Scheme and the implications are also addressed in the timetable section below. If the process for both plans is aligned for later stages, there is also the potential for the Councils to keep under review whether it is appropriate to merge the AAP into the Local Plan at the Proposed Submission stage, if that is the most appropriate thing to do at that point in time in terms of timescale, resources and budget.

Relationship with Major Infrastructure Projects

31. The Councils' aim remains to respond constructively to the opportunities that the Greater Cambridge area offers and to deliver a robust plan which responds to these issues, as well as the other big themes raised in the First Consultation,

such as responding to climate change. The issues facing the Greater Cambridge area are particularly complex, including a number of major infrastructure proposals being developed by other organisations that could provide significant opportunities for the area.

32. Government messaging regarding substantial growth in the East West Rail corridor will require consideration of the growth agenda in the LP process. Under the current timetable for East West Rail, the preferred station location may not be known until after Local Plan Preferred Options decision on site allocations (summer 2021), but we expect to know the options being considered. The East West Rail DCO is currently expected to be submitted for examination before the GCLP Proposed Submission consultation with the outcome to be known before Local Plan adoption. The East West Rail company expect the new railway to be operational by 2030. This project will need to be kept under review in terms of the impact on the Local Plan strategy.
33. Based on the Strategic Outline Business Case the Cambridge Autonomous Metro will reach, subject to approvals and funding, a Full Business Case in mid-2022, and the outcome of a transport and works act application by mid 2023.

Impact of COVID19 on the plan preparation timetable

34. Whilst the planning department is taking steps to minimise the impact on service delivery, there are aspects of local plan preparation that will be affected. Most of the evidence preparation can continue, but certain projects will be directly impacted. For example, an update of the Gypsy and Traveller Accommodation Needs Assessment has been jointly commissioned with other councils in the area, but due to the need to carry out face to face household surveys, the project has been delayed. There will also be a need to keep under review the need to update some evidence document to take account of the impacts of Covid-19. This will be done at an appropriate point to inform key stages in plan making whilst learning from the actual impacts of Covid-19.
35. Other aspects of plan making could be impacted. For example, the Duty to Cooperate requires us to work with a range of stakeholders and neighbouring districts. This was planned to have been done with workshops and face to face meetings starting over the summer. Looking further ahead, more general stakeholder engagement and public consultation could be affected. Councils are already adapting to different ways of continuing with formal meetings and wider engagement.
36. The impacts of COVID19 are changing on an almost daily basis. It is difficult at this stage to be certain on the full implications for the plan making timetable and it will be kept under close review and if necessary the need for any further updates to the timetable would be brought back to members for consideration.

Proposed revised Local Plan timetable

37. The current LDS needs to be updated now, but the programme for the later stages of plan making needs to reflect the current complexity in an appropriate

way. At this time it is considered there could be two scenarios for the way the latter stages of plan preparation could take place:

- Option 1 - Local Plan runs ahead of the North East Cambridge Area Action Plan

If the Local Plan assessment of options were to identify an appropriate strategy or policy approach that did not include reliance on the NEC site or which could allow for the AAP to follow on without undermining the soundness of the Local Plan, there would be potential to progress the Local Plan to the Proposed Submission stage in Spring 2023 (or sooner if practicable). The plan would be Submitted in Autumn 2023, followed by public examination. The timing of the examination is in the hands of the independent Inspector. This alternative scenario could achieve an overall timescale that is 6 months or more quicker than option 2.

- Option 2 – Align the Local Plan and the North East Cambridge AAP processes

If the Local Plan assessment of options were to identify an appropriate strategy or policy approach that includes the NEC site as potentially making an important contribution to the development strategy and delivery of homes and jobs, it would be necessary to align the AAP and Local Plan to parallel timetables so that Proposed Submission consultation on both plans takes place after the DCO outcome is known, in order to provide certainty on the relocation of the WTP and confidence in the site capacity and delivery trajectory for NEC and the role it could play in the overall development strategy for Greater Cambridge. This would mean that Proposed Submission publication of both plans would take place in Autumn/Winter 2023, and submission for Examination in Spring 2024 (based on the current DCO timetable). The timing of the remainder of the Local Plan process is in the hands of the Inspector.

38. The timing of the Proposed Submission stage and beyond will be kept under close review and refined when there is greater certainty over the timetable. A separate report on this agenda deals with a formal update to the published Local Development Scheme to give effect to this updated process and timetable.

Duty to Cooperate

39. By law the Councils are required to engage effectively and on an ongoing basis with a range of authorities and statutory bodies under the Duty to Cooperate. To demonstrate this effective and ongoing engagement, the National Planning Policy Framework (NPPF) requires the Councils to produce a Statement of Common Ground with relevant parties at key stages in the Local Plan process.

40. A proposed approach to meeting the Duty to Cooperate has been prepared and is attached as Appendix 4. It proposes that engagement on the duty to cooperate should include:

- Letters to the Duty to Cooperate bodies seeking views on the proposed approach to be taken to the duty to cooperate, including confirming the strategic cross-boundary matters relevant to Greater Cambridge
- Initial bilateral officer level duty to cooperate meetings with neighbouring councils and the three key statutory bodies (Environment Agency, Historic England and Natural England) to establish relationships, and to begin more detailed substantive discussion of the relevant strategic matters
- A Duty to Cooperate roundtable forum to be established to meet at key stages in the process involving all the proposed signatories and key statutory bodies to discuss duty to cooperate issues in the round, with an officer meeting immediately followed by a member meeting. This reflects advice from the author of the PAS Local Plan Toolkit. The first of these meetings is proposed to be held in Summer 2020, once we have reported the consultation responses to Members in June and updated the LDS. A second forum could be held alongside the stakeholder engagement in Autumn 2020 on the evidence and options.
- Further bilateral meetings with relevant bodies if required to address substantive strategic cross-boundary matters on an ongoing basis, to include lead Member meetings as appropriate.

41. It is proposed that the Statement of Common Ground will be a single overarching document covering all strategic matters, with duty to cooperate bodies signing up only to sections relevant to them. At all points in the process there is the potential that if discussion of specific strategic matters become complex there would be scope for appending additional topic-specific Statements of Common Ground with relevant parties.

Options

42. JLPAG members may decide to:

- a) Recommend to the respective Local Planning Authorities that they should agree to the changes proposed to the plan making stages, and revisions to the timetable, and /or the approach to the Duty to Cooperate, without any amendments; or
- b) Recommend to the respective Local Planning Authorities that they should agree to changes proposed to the plan making stages, and revisions to the timetable, and /or the approach to the Duty to Cooperate, incorporating amendments agreed in discussion at JLPAG; or
- c) Recommend to the respective Local Planning Authorities that they should not agree to changes proposed to the plan making stages, and revisions to the timetable, and / or the approach to the Duty to Cooperate.

Implications

43. 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

44. Currently anticipated to be within current budgets. This will be kept under review alongside other work priorities

Legal

45. The review of the Local Plan process has been prepared with a view to ensure a legally compliant plan that is capable of being found sound at examination.

Staffing

46. Currently anticipated to be delivered within our existing budgets. This will be kept under review alongside other work priorities.

Risks/Opportunities

47. The Local Plan is a key corporate priority and will be monitored against the timetable to be set out in the updated Local Development Scheme (see separate report on this agenda).

Equality and Diversity

48. Equalities Impact Assessment was carried out on the First Conversation consultation and can be viewed on the Local Plan website. For future plan making stages this will be updated.

Climate Change

49. The Local Plan provides 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 plan is prepared. One of the big themes for the plan identified in 'The First Conversation' 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.

Consultation responses

50. None.

Background Papers

Documents related to the Greater Cambridge Local Plan Issues and Options 2020: The First Conversation are available to view on the Local Plan webpage at:
www.greatercambridgeplanning.org

Greater Cambridge Local Plan: Lessons Learned and Good Practice – published on the following committee agendas:

[South Cambridgeshire Cabinet 6 November 2019](#)

[Cambridge Planning and Transport Scrutiny Committee 7 November 2019](#)

Appendices

Appendix 1 - The First Conversation – Initial Feedback from the Consultation

Appendix 2 - Greater Cambridge Local Plan – Supporting Evidence Update

Appendix 3 - Duty to Cooperate - Proposed Approach

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