

Background

West Suffolk Council, formed from the former Forest Heath and St Edmundsbury areas, came into being on 1 April 2019. West Suffolk Council has 'inherited' the local plans that were prepared for and adopted by the former St Edmundsbury and Forest Heath councils. These existing documents include both strategic policies and policies specific to the area. Preparing the West Suffolk Local Plan (WSLP) will include reviewing existing planning policies, updating, deleting and adding where appropriate to the current context and future needs.

The preparation of the plan can be described in three key stages:

- This **issues and options** stage is the very beginning of the process of producing a plan for West Suffolk. Its scope is to identify the key strategic issues. The plan should address and set out options and initial ideas for the strategic policies in areas such as housing and economic growth and where the growth might take place (distribution), and the provision of strategic infrastructure.
- Further research and studies need to be carried out to provide the evidence to develop strategic and local policies. This work and responses to this issues and options stage will contribute to the next stage, the **preferred options** draft of the plan. It is anticipated that consultation will take place in 2021.
- Responses to consultation on the second document will inform the **submission draft** of the local plan (anticipated publication date January 2022). It is this draft, together with the responses to it that will be examined by an independent inspector appointed by the Secretary of State.

The Issues and Options consultation document lists strategic objectives under the following headings:

- Business and the local economy
- Climate change mitigation and adaptation
- Homes
- Rural areas
- Environment
- Communities, wellbeing and culture
- Connectivity and activity

The consultation document identifies three strategic issues:

- **Climate change**
West Suffolk declared a climate emergency in 2019 with the target to be net-zero carbon by 2030. In July 2019 the council set up a task force to research and recommend actions and initiatives to address the climate emergency and propose practical solutions, investments and actions.
- **The right homes for our communities**
The minimum number of homes needed (known as local housing need (LHN)) is calculated using the standard method set out in national planning guidance. This equates to around 800 new dwellings a year, and over 20 years equals around 16,000 new homes.

There are 8,100 homes in the pipeline (sites with planning permission at 1 April 2020) and if the 5,300 homes allocated in existing local plans are taken forward into the plan review they would reduce the number of new homes that need to be planned for to a minimum of 2,600 homes.

Past annual delivery since 2011 shows the combined rates of the former Forest Heath and St Edmundsbury areas were lower than the LHN, averaging 637 dwellings per annum (dpa), whereas local plan annual targets when combined show a higher need than the LHN at 886dpa. There is an opportunity to consider whether to plan for the standard methodology with an appropriate buffer to ensure a continuous supply of housing land comes forward or whether an alternative approach should be taken. The draft preferred options stage of the local plan will then consult on a preferred housing requirement figure.

- **Economic growth and the provision of strategic infrastructure**

Despite the amount of out-commuting West Suffolk is a net importer of employment. This presents challenges including issues such as traffic congestion at peak times in towns and at key junctions on the A11 and A14.

To maintain a balanced economy it will be important to provide the right sites to enable a wide range of business growth in the district, whether by attracting new inward investment from businesses located outside West Suffolk or allowing existing businesses within the district to expand.

West Suffolk is predominantly rural in character, covering a wide geographic area. Much of the district is located away from the primary route network and has limited access to very high-speed broadband facilities. This can limit the opportunities for rural enterprise, or limit home working and the need to travel.

The consultation documents identify six potential types of places for the draft settlement hierarchy:

- Towns (Newmarket, Mildenhall, Haverhill, Bury St Edmunds and Brandon)
- Key service centres
- Local service centres
- Type A villages
- Type B villages
- Countryside

Four options are put forwards for the distribution of growth.

- Focus growth on **new settlement(s)** of a sufficient scale to support new community infrastructure and employment. The new town would comprise of a minimum of 3,000 homes and be located on a primary road/rail route with good accessibility to one of the towns. This would result in the need to provide less growth throughout the district.
- Focus development in **towns and key service centres** where infrastructure and environmental constraints allow. The options for further growth in Brandon, Newmarket and Mildenhall may be limited due to lack of available sites/environmental and other constraints which means that town growth may need to be concentrated in the central south area of the district in Bury St Edmunds and Haverhill.
- Focus growth on **towns, key service centres and local service centres through urban extensions and infilling** where infrastructure and environmental constraints allow. As above, the opportunities for further growth in Brandon, Newmarket and Mildenhall and some of the key service centres may be limited due to lack of available sites, environmental and other constraints which means that growth may need to be concentrated in the central south area of the district in Bury St Edmunds and Haverhill and in those key service centres which are suitable to take more growth.
- **Disperse development** around the district allocating sites across the towns, service centres and villages to allow them to grow where infrastructure and environmental constraints allow.

Main Issues relevant to Greater Cambridge

West Suffolk Council is a neighbouring local authority to Greater Cambridge and the Greater Cambridge Shared Planning (GCSP) has already started discussions on cross-boundary and strategic issues as part of the preparation of the Greater Cambridge Local Plan and North East Cambridge Area Action Plan to meet Duty to Cooperate obligations.

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 in the consultation document as strategic matters. There is specific reference to transport links with Cambridge, in particular the A14, A11, A1307 and links with the Cambridge Biomedical Campus. There is also reference to rail links between Bury St Edmunds, Newmarket and Cambridge. The Cambridgeshire Autonomous Metro (CAM) is cited as an emerging sub-regional transport option, although it is stated that public transport use in West Suffolk is lower than the regional or national average.

There are several references in the consultation document to the challenge of being a rural area with poor broadband speeds which means that people need to travel to work rather than being able to rely on homeworking.

Further evidence is being prepared to inform the draft West Suffolk Local Plan; some being prepared jointly with GCSP, including an update to the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment and Housing Needs of Specific Groups Assessment.

Proposed main response points

West Suffolk Council is a neighbouring local authority to Greater Cambridge and GCSP has already started discussions on cross-boundary and strategic issues as part of the preparation of the Greater Cambridge Local Plan and North East Cambridge Area Action Plan. These discussions will continue as these plans and the West Suffolk Local Plan progresses and will meet the Duty to Cooperate obligations.

The Councils note the three strategic issues outlined in the Issues and Options report: Climate Change; The right homes for our communities; and Economic growth and the provision of strategic infrastructure.

The Councils note that 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 West Suffolk residents, and these trips should be encouraged by sustainable modes.

Note the early development of future public transport improvements; the Eastern Section of East West Rail and CAM which should provide opportunities to improve the public transport connections to Greater Cambridge as well as within West Suffolk in future.

In common with West Suffolk Council, Cambridge City Council and South Cambridgeshire District Council have both declared climate emergencies. The Councils acknowledge the challenges faced by West Suffolk in addressing the Climate Emergency.

While the focus should, rightly, be on sustainable modes of transport, the Councils suggest that there also needs to be consideration of the impacts of the plan on the Strategic Road network and the Major Road Network – including the A14, A11 and A1307 – which cross into Greater Cambridge from West Suffolk.

Note the additional evidence being prepared to inform the draft Local Plan, including documents being prepared jointly with the GCSP: an update to the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment and Housing Needs of Specific Groups Assessment. The Councils note that there are a number of sites in the West Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) close to the boundary with Greater Cambridge and encourage that the Councils continue to work together addressing infrastructure requirements and cross-boundary matters in the development of their Local Plans.

Appendices

Appendix A: Proposed joint response by South Cambridgeshire District Council and Cambridge City Council Councils to West Suffolk Local Plan (Regulation 18) Issues and Options

Background Papers

The West Suffolk Local Plan (Regulation 18) Issues and Options consultation materials are available online:

https://westsuffolk.inconsult.uk/consult.ti/WSLP_Issues_and_Options/consultationHome

Appendix A: Proposed joint response by South Cambridgeshire District Council and Cambridge City Council Councils to West Suffolk Local Plan (Regulation 18) Issues and Options

The Greater Cambridge Shared Planning Service (GCSP), on behalf of Cambridge City Council and South Cambridgeshire District Council thank West Suffolk Council for the opportunity to comment on the West Suffolk Local Plan (Regulation 18) Issues and Options. The Councils are already engaging with West Suffolk Council under the Duty to Cooperate in relation to Greater Cambridge Local Plan and North East Cambridge Areas Action Plan and look forward to ongoing engagement as both Greater Cambridge and West Suffolk plans progress.

The Councils note the three strategic issues outlined in the Issues and Options report: Climate Change; The right homes for our communities; and Economic growth and the provision of strategic infrastructure.

West Suffolk has a close relationship with Greater Cambridge, with a shared travel to work, housing market and economic area. Whilst West Suffolk may be a net importer of jobs, higher wages in Cambridge are a pull factor for West Suffolk residents commuting to jobs within Greater Cambridge. West Suffolk is within the top three districts providing workers for Greater Cambridge and where possible these trips should be encouraged by sustainable modes.

We note there are improvements to public transport, currently in the early stages of development, which should improve connectivity between Greater Cambridge and West Suffolk. The proposed Eastern section of East West Rail (serving Cambridgeshire, Suffolk and Norfolk) and in particular Cambridgeshire Autonomous Metro (CAM) which will serve Cambridge and the surrounding market towns including Haverhill and Mildenhall, will improve sub-regional connectivity.

In common with West Suffolk Council, Cambridge City Council and South Cambridgeshire District Council have both declared climate emergencies. As such, whilst the Councils have no preferred option for the distribution of future growth, they would suggest that the preferred strategy should be compatible with addressing the climate agenda. For example, evidence supporting the Greater Cambridge Local Plan identifies that a dispersed development strategy focused on village development is the least sustainable option in Greater Cambridge, given that transport is one of the greatest contributors to carbon emissions. The Councils suggest that development should be focused in sustainable locations which can reduce the need to travel, and where possible maximise opportunities for travel by non-car modes, particularly where locations may encourage commuting into Greater Cambridge. Further to this, recently published evidence supporting the Greater Cambridge Local Plan identified that, at least in a Greater Cambridge context, the smallest size of new settlement that could be considered to be sustainable is 4,500 homes. As such, we would encourage West Suffolk Council to consider infrastructure and service level thresholds when considering any new communities to minimise the travel and associated carbon impacts of such development.

While the focus should, rightly, be on sustainable modes of transport, the Councils suggest that there also needs to be consideration of the impacts of the plan on the Strategic Road network and the Major Road Network – including the A14, A11 and A1307 – which cross into Greater Cambridge from West Suffolk.

The Councils note that a range of additional evidence is being prepared to inform the draft Local Plan, including documents being prepared jointly with the GCSP, including an update to the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment and Housing Needs of Specific Groups Assessment. This reflects the number of strategic infrastructure requirements and shared cross-boundary issues between West Suffolk and Greater Cambridge. The Councils note that there are a number of sites in the West Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) close to the boundary with Greater Cambridge. The Councils look forward to engaging with West Suffolk on an ongoing basis through our respective plan-making processes regarding strategic cross-boundary matters of shared interest, including if sites close to the Greater Cambridge/West Suffolk boundary were to be taken forward.