

Item

Greater Cambridge Local Development Scheme and Greater Cambridge Local Plan First Proposals representations

Key Decision

To:

Councillor Katie Thornburrow, Executive Councillor for Planning and Infrastructure

Planning & Transport Scrutiny Committee 28 June 2022

Report by:

Stephen Kelly, Joint Director of Planning and Economic Development
Tel: 01223 457009 Email: stephen.kelly@greatercambridgeplanning.org

Wards affected:

All

1. Executive Summary

- 1.1. This report provides an update on the results of the consultation on the Greater Cambridge Local Plan First Proposals (Preferred Options) held in late 2021 and the representations received, and seeks agreement to a revised timetable for future stages of the Local Plan, and also of the North East Cambridge Area Action Plan, as set out in an update to the Greater Cambridge Local Development Scheme. Both plans are being prepared jointly between Cambridge City Council and South Cambridgeshire District Council. A mirror report will be considered by South Cambridgeshire's Scrutiny and Overview Committee on 23 June and by Cabinet on 11 July 2022.

- 1.3 The First Proposals (Preferred Options) consultation was held between 1 November and 13 December 2021. The consultation set out the Councils' preferred approach to the level of growth that should be planned for, where it should be planned, and identified the planning policies the Councils proposed to prepare that would shape development and guide planning decisions. The purpose of the

consultation was to invite responses to these proposals before the Councils developed the approaches into detailed planning policies. The responses have now been registered and have been published on the councils' website. This report provides an overview of the consultation and is accompanied by a Consultation Report for members to note.

- 1.4 Looking ahead to future next stages of plan-making, the Planning and Compulsory Purchase Act 2004 (as amended) requires that Local Planning Authorities must prepare and maintain a plan-making timetable, recorded in a Local Development Scheme (LDS). The current LDS was adopted in 2020, and there have been a number of changes in circumstance affecting both plans which now necessitate an update to the LDS. The changes to the plan-making timetable proposed reflect both the opportunities and the complexity of issues being addressed by the plans, and the relationship with processes being undertaken by other organisations such as Water Resources Plans that will set out plans for future water supply, and the Development Consent Order for the relocation of the Cambridge Waste Water Treatment Plant.

2. Recommendations

2.1. The Executive Councillor is recommended to:

- i. Note the representations made to the Greater Cambridge Local Plan First Proposals (Preferred Options) consultation and the report on the consultation at Appendix 1.
- ii. Agree to adopt the updated Local Development Scheme for Greater Cambridge included at Appendix 2 of the report, to take effect from Monday 1st August 2022.
- iii. Agree to grant delegated authority to the Joint Director of Planning and Economic Development, in consultation with the South Cambridgeshire District Council Lead Cabinet member for Planning and the Cambridge City Council Executive Councillor for Planning and Infrastructure (in consultation with chair and spokes), to make any minor editing changes and corrections identified to the updated Local Development Scheme for Greater Cambridge included at Appendix 1 of the report prior to publication.

3. Background

Greater Cambridge Local Plan First Proposals Consultation Report

The First Proposals consultation

- 3.1 The Greater Cambridge Local Plan First Proposals consultation was held jointly by Cambridge City Council and South Cambridgeshire District Council between 1 November and 13 December 2021. A report on the consultation is provided in Appendix 1 of this report.
- 3.2 The consultation approach built upon methods used in the First Conversation consultation in 2020. Comments were invited via a digital website version as well as a standard document. Comments could also be provided via an anonymous quick survey.
- 3.3 A range of events were held during the consultation period. A number of in person events were held, along with a series of online webinars covering key topics and explaining how to get involved.
- 3.4 The First Proposals included proposed approaches regarding:
 - a vision and aims for the plan;
 - objectively assessed needs for jobs and homes;
 - the development strategy proposed for Greater Cambridge for the plan period 2020-2041 and beyond;
 - new site allocations for housing, mixed use and employment development to meet the identified needs; and
 - a suite of ambitious policy approaches to provide a framework for development management decisions that respond to the overarching themes of climate change, biodiversity and green spaces, wellbeing and social inclusion, great places, jobs, homes and infrastructure.
- 3.5 The purpose of the consultation was to invite responses to these proposals before the Councils developed the approaches into detailed planning policies, which would then be subject to consultation as part of a full draft plan.
- 3.6 The First Proposals made clear that the proposed development strategy was contingent upon there being clear evidence that water supply challenges could be addressed before the plan moved to the draft plan stage. Further to this, the First Proposals also acknowledged that there

were factors outside the plan-making process that impact on the deliverability of key strategic sites in the plan, which will need to be addressed in future stages of plan-making. These include Cambridge Waste Water Treatment Plant relocation, Cambridge Airport relocation and the proposed East West Rail line between Bedford and Cambridge.

Responses to the consultation

- 3.7 Responses to the consultation have now been processed and published, and can be found in full on the Greater Cambridge Planning website.
- 3.8 In summary:
- Approximately 4,100 comments were made on the First Proposals, by 625 different respondents (this include comments received online or input having been received by other means e.g. email)
 - The quick survey received 5,551 answers or comments from 598 unique respondents.
- 3.9 The First Proposals also provided the opportunity to submit further site suggestions, adding to the 650 that had already been received to the call for sites processes carried out in 2019 and 2020. New information could also be submitted, with many promoters responding to the assessments of their sites that was included in the Greater Cambridge Housing and Economic Land Availability Assessment. In total:
- 30 new sites were received.
 - 184 sites had new information submitted which in some cases included revisions to site boundaries
- 3.10 The Greater Cambridge Local Plan First Proposals Consultation Report included at appendix 1 provides a high level summary of the consultation responses.
- 3.11 As a brief overview of the key issues raised:
- Strategy
 - Vision and aims: general strong support
 - Development levels: mixed responses – comments supporting higher levels of development pointed to the need to support the economy; comments advocating lower levels of development noted

concern regarding the impact of development on water resources and biodiversity

- Overarching Strategy: mixed responses – support for locating development at strategic sites close to transport infrastructure thereby limiting climate impacts, and limiting village development; conversely, substantial concern from site promoters about over-reliance on uncertain delivery at a few strategic sites, with the associated need to distribute development more widely at a range of sites across the rural area; very strong concern regarding raising concern about inadequate water supply
- New strategic sites identified in the First Proposals: some support for North East Cambridge but strong concern about the impacts of the Cambridge Waste Water Treatment Plan relocation; general support for allocation of Cambridge East; support for expansion of Cambourne in relation to rail station provision, but concern about delivery of the railway, and concern about overdevelopment and sprawl in this location; few comments regarding Babraham Research Campus.
- New smaller sites identified in the First Proposals: mixed responses – strong concern about a range of impacts from proposed development at Land between Hinton Way and Mingle Lane, Great Shelford; concern regarding overdevelopment at Melbourn, and concern about a range of impacts from proposed development at Land at Mansel Farm, Oakington.
- Themes:
 - Climate change: strong support for ambitious net zero carbon building standards; concern given the climate crisis whether the policies go far enough.
 - Biodiversity and green spaces: strong support for 20% Biodiversity Net Gain and green infrastructure ambitions; detailed comments about the implementation of these.
 - Wellbeing and Social inclusion: support for this priority and the policies within the theme; comments raised about the detail and implementation of these.
 - Great places: support for this priority and the policies within the theme; comments and ideas raised about the detail and implementation of these.
 - Jobs: support for most policies; mixed responses about how flexible the approach should be to new employment proposals in relation to uses and location.

- Homes: support for most policies; policies generating most debate included affordable housing, specialist housing and homes for older people, and gypsy and traveller provision.
- Infrastructure: support for most policies; particular focus on sustainable transport, parking and electric vehicles, and the importance of planning effectively for infrastructure in general.

3.12 This report does not seek to respond to the representations. Officers will now review the comments received in detail, exploring the issues to inform the development of preferred policy approaches.

3.13 Responses to the issues raised will be prepared and form part of future reports to members as the local plan is developed.

The Greater Cambridge Local Development Scheme

3.14 The Planning and Compulsory Purchase Act 2004 (as amended) requires Local Planning Authorities to prepare and maintain a Local Development Scheme (LDS), and states that Development Plan Documents (including the Local Plan and any Area Action Plans) must be produced in accordance with it. The Greater Cambridge LDS provides information on the documents that the Cambridge City Council and South Cambridgeshire District Council intend to produce to form their planning policy framework and sets out the timetable for their production. The LDS is designed to help the local community and all our partners interested in development and the use of land and buildings in Greater Cambridge to understand what plans the Councils have and intend to produce.

3.15 The LDS sets out the broad timetable for the preparation of the joint North East Cambridge Area Action Plan (NECAAP) and the joint Greater Cambridge Local Plan (GCLP). The current Greater Cambridge Local Development Scheme was adopted by the Councils in July 2020. The table below presents content from the 2020 LDS, setting out the future stages and timings for NECAAP and GCLP respectively.

3.16 The adopted LDS makes clear that there is a direct relationship between the plan making timetable and the timing and outcome of the Cambridge Waste Water Treatment Plant (CWWTP) Development Consent Order (DCO). It states that '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 CWWTP 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.’

Table 1: Future plan-making stages as set out in the current LDS adopted in 2020

Plan	Draft Plan stage	Proposed Submission consultation	Submission to government
NECAAP	Summer 2020 (completed)	Autumn 2023 Note: to follow outcome of Cambridge Waste Water Treatment Plant (CWWTP) DCO	Spring 2024 Note: subject to the outcome of Cambridge CWWTP DCO
GCLP: <u>Option 1</u> - GCLP runs ahead of the NECAAP	Summer 2022	Spring 2023	Autumn 2023
GCLP: <u>Option 2</u> - Align the Local Plan and the NECAAP processes		Autumn/Winter 2023	Spring 2024 Note: subject to the outcome of Cambridge CWWTP DCO

3.17 The Local Development Scheme states that it will be updated or reviewed where the need to do so is identified. At this point in the plan making process a number of issues have arisen including changes in circumstances since the LDS was prepared that warrant a review.

Key issues informing an updated LDS

3.18 As noted above at 3.6, the First Proposals (Preferred Options) was clear about a number of key factors that could impact on the development strategy included in the consultation, including water supply, Cambridge Waste Water Treatment Plant relocation, Cambridge Airport relocation and East West Rail. An update on these issues and their impact on the revised LDS is provided below.

Water

3.19 Our evidence accompanying the First Proposals highlighted the challenges that exist with the availability of a sustainable water supply to serve identified needs in light of climate change. The First Proposals was clear that the proposed strategy was contingent upon evidence being available during the preparation of the new plan that demonstrates that a sustainable water supply will be provided to support the preferred option that does not cause unacceptable environmental harm. As noted above, representations to the First Proposals, including from the Environment Agency, highlighted the significance of this issue.

3.20 The Councils continue to engage with all relevant bodies in the water resource planning process. Water Resources East is due to consult on its draft Water Resources Regional Plan for Eastern England to 2050 in autumn 2022; Cambridge Water and Anglian Water will also consult around the same time on their draft 25 year Water Resources Management Plans covering Cambridge and its surroundings.

3.21 Given the above issues, the revised GCLP timetable set out in the LDS programmes draft plan consultation later than in the 2020 LDS, to allow for a greater level of certainty on the key issue of water supply, that is expected to come from the draft water resource plans. It is also proposed to include an additional committee stage for Members to consider this and other key issues and to confirm the development strategy ahead of drafting the full plan (see section 4 below). The Councils will continue to keep under review the content of the GCLP and the timetable set out in the LDS in relation to this critical issue.

3.22 The Preferred Options identifies that key major infrastructure proposals being developed by other organisations are significant in the opportunities they provide for some of the new strategic sites identified to respond to identified needs for jobs and homes. The evidence available in terms of the timing, and certainty over delivery of these major infrastructure projects, is also important in the revised timetable for the new Local Plan. Taking each of these in turn:

North East Cambridge and Cambridge Waste Water Treatment Plant (CWWTP) Development Consent Order (DCO)

- 3.23 Evidence supporting the GCLP identifies that North East Cambridge is the most sustainable location available for development within the Greater Cambridge area. Plans for the site have been led to date via the NECAAP on the back of policies in the adopted 2018 Local Plans allocating the site for redevelopment (although the 2018 plans make no reliance on any development in the plan period to 2031), which reflect the planning benefits of regeneration of this brownfield site that have long been recognised by the Councils. The Proposed Submission NECAAP was agreed by the Councils in January 2022 for publication and consultation to take place only if and when the CWWTP DCO has been approved. The role of NEC is confirmed as a key part of the emerging GCLP development strategy having considered the benefits of the site compared with all other reasonable spatial options.
- 3.24 Effective and efficient development of the NEC site is dependent 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, similarly to the NECAAP. The timetable for the DCO has been amended since the assumptions underpinning the 2020 LDS, with the outcome of the DCO process now anticipated in Winter (early) 2024 rather than Autumn 2023. The LDS needs revising to account for this.
- 3.25 Officers are mindful of the role that the emerging Local Plan and Area Action Plan will play in the Development Consent Order process to relocate the CWWTP, in demonstrating the substantial planning benefits that relocation of the CWWTP will enable. This is acknowledged in the 2020 LDS (paragraph 10). From officers' initial consideration of the representations received to the Local Plan Preferred Options consultation, it does not appear that any new substantive issues have been raised that the Councils were not aware of in making the decision to agree the Proposed Submission Area Action Plan (Regulation 19) that go to the principle of the planning merits of the site, although there are representations addressing the details of the proposed development, some of which propose further development within the North East Cambridge area. These will be given further consideration as the plan progresses. As such, it is not anticipated that the results of consultation would impact on the LDS timetable for the Local Plan and Area Action Plan, or indeed the role

that North East Cambridge can play as a strategic site at the heart of the development strategy, reflecting the evidence supporting the emerging Local Plan that North East Cambridge is the most sustainable location for development in Greater Cambridge. This is subject to a full consideration of the representations as part of the Local Plan process, plus updating of relevant evidence including reviewing and as necessary updating the Sustainability Appraisal. However, at this point, officers take the view that from the review of the representations so far carried out, there is no material risk to progressing the Area Action Plan as set out in the updated LDS, or including North East Cambridge as a key part of the development strategy in the Local Plan to make an important contribution to meeting development needs, subject to the DCO being approved.

Cambridge East and Cambridge Airport relocation

- 3.26 The First Proposals include allocating Cambridge Airport for strategic scale development. This reflects the vision for a new sustainable urban quarter to Cambridge originally planned in the joint Cambridge East Area Action Plan 2008, but unable to come forward in the 2018 Local Plans because Marshall advised at that time that the Airport site would not be available for development in the period covered by the adopted plans to 2031. The earlier allocation was therefore converted in the 2018 Local Plans to safeguarded land for future development if the site became available, that could only come forward through a review of the Local Plans. The proposed allocation in the Preferred Options comprises the safeguarded land and reflects advice from Marshall that it intends relocating its aerospace and defence business to a preferred site at Cranfield Airport. Marshall supports the proposed allocation and has advised that it is confident that the proposed allocation can be delivered as envisaged in the First Proposals, noting that it aims to submit a planning application at Cranfield in autumn 2022. This issue has not affected the dates in the revised LDS.

Cambourne Expansion and East West Rail

- 3.27 The First Proposals identifies Cambourne as a broad location for future growth in the 2030's to respond to the opportunity that would be provided by the proposed East West Rail Bedford to Cambridge line that includes a station at Cambourne. Noting the uncertainty about the exact station location and timing of delivery, the First Proposals says that future work would need to be completed to confirm the exact location, scale and type of development. The consultation assumed that 1,950 homes would be delivered here to 2041.

3.28 The Councils will monitor progress with the EWR project and will need to keep under review implications of any potential uncertainty around EWR on the Preferred Options development strategy as we progress the plan. This issue has not affected the dates in the revised LDS.

4 Updated Local Development Scheme 2022

4.1 Drawing on the key issues discussed above, there is a need to revise the 2020 Local Development Scheme timetables to account in particular for changes in circumstances in relation to: evidence to demonstrate an appropriate water supply, change to the timetable of the CWWTP DCO, and allow for appropriate time in the process to deal with the stages following each consultation, noting the complexity of issues and the volume of comments raised by Preferred Options consultation. The changes are as follows.

Timetable to draft plan consultation

4.2 In relation to the next stages of plan-making, the proposed revised LDS at Appendix 2 programmes the full draft GCLP consultation for autumn 2023 (a change from summer 2022 in the adopted 2020 LDS). The full draft Local Plan will include the development strategy and sites, and also all the themes covered in the Preferred Options: climate change, biodiversity & green spaces, wellbeing & social inclusion, great places, homes, jobs and infrastructure. The committee process would be undertaken in June/July 2023, following elections. This change allows for the draft regional Water Management Plan to 2050 to be published in autumn 2022 and any implications for the plan considered.

4.3 However, before the full draft GCLP is brought to members for proposed consultation in June/July 2023, officers propose an additional stage proposed to bring a report to members in January 2023 to confirm the Preferred Options for the Greater Cambridge Local Plan strategy and sites – this will include consideration of the representations on those issues received to the 2021 Preferred Options consultation, evidence provided by the draft water resource plans, an update to the evidence of needs for jobs and homes, more detailed work on capacity and design principles for the new strategic sites, and an update to other key evidence including the Sustainability Appraisal. This provides the opportunity for the Councils to confirm their preferred options for the strategy and sites before the full draft Greater Cambridge Local Plan is prepared and brought to Members.

Later plan-making stages

- 4.4 As both the Greater Cambridge Local Plan and the North East Cambridge Area Action Plan are predicated on the relocation of the CWWTP, the timing of both Proposed Submission plans must be amended to follow the anticipated date of the outcome of the DCO. If the DCO is approved in Winter (early) 2024, rather than Autumn 2023 as informed the 2020 LDS, it is anticipated that the Proposed Submission Greater Cambridge Local Plan and the North East Cambridge Area Action Plan will be published for consultation in Autumn 2024. This allows for undertaking the Member process in Summer 2024, preparing for publication, and avoiding the summer holiday period with consultation starting in Autumn 2024. This would also follow the anticipated publication of the final Water Resources East Plan and the local water companies' Water Resources Management Plans in Autumn 2023, which is key evidence necessary to demonstrate delivery of the plan.
- 4.5 Following the Proposed Submission plan publications and consultations, the formal representations received will be registered and considered. Assuming no new issues are raised in representations that would require material changes to be made, the plans would then be Submitted for Examination in Summer/Autumn 2025. Note: The Councils have already indicated in the 2020 LDS the intention to keep under review whether it is appropriate to merge the North East Cambridge Area Action Plan into the Local Plan at the Proposed Submission stage.
- 4.6 Following Submission of the plans, the timings of the remainder of the plan-making processes are in the hands of the Inspectors, including how the examinations for the separate plans would be sequenced. Officers propose to seek discussions with the Planning Inspectorate in due course to explore a number of key procedural issues relating to the examination of both plans, including this issue. The changes to the national plan making system proposed by the Levelling Up and Regeneration Bill (see further detail below) may also result in changes to the approach, process and timetable.
- 4.7 The key future stages in the plan making process for both GCLP and NECAAP are shown below in table 2, with the full timetable set out in the updated Local Development Scheme at Appendix 2.

Table 2: Future plan-making stages as set out in the proposed revised LDS 2022

Plan	Draft Plan stage	Proposed Submission consultation	Submission to government
<u>GCLP</u>	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 Note: Proposed Submission plan agreed in January 2022 for consultation to follow the outcome of CWWTP DCO	Summer/Autumn 2025 Note: subject to the outcome of CWWTP DCO

5 Relevant issues to the revised LDS

Five year review of policies

- 5.1 Legislation requires Local Planning Authorities to review Local Plans every 5 years from their adoption date, to ensure that policies remain relevant and effectively address the needs of the local community. The Councils are already preparing a successor to their adopted plans, but the South Cambridgeshire and Cambridge Local Plans adopted in 2018 will reach their 5 year anniversaries in September and October 2023 respectively, which is before the new plan will be adopted under both the current and proposed revised LDS.
- 5.2 It is important to note that after the 5 year anniversary, the policies within the Local Plans do not automatically become out of date: applications for planning permission must still be determined in accordance with the development plan unless material considerations indicate otherwise, which is a judgement for the decision-maker.
- 5.3 Ahead of the 5 year anniversary of the plans, officers will bring to members for confirmation a review of the adopted policies against current legislation, national policy and up to date evidence, following the approach set out in national guidance. In particular, following the 5 year anniversary, it is anticipated that Housing Land Supply calculations would need to be tested against Government's Standard Method Local

Housing Need rather than against the adopted plan housing targets; initial estimations based on current assumptions (which are clearly subject to change) are that this Local Housing Need figure will be similar to the adopted 2018 Local Plan targets, and as such this change is not expected to make a significant difference to the Councils' housing land supply position. While we can't prejudge the outcome of the review, there is a reasonable expectation that most of the policies in the adopted plans will be considered to remain up to date and will therefore retain full weight.

Levelling Up and Regeneration Bill

- 5.4 The Levelling Up and Regeneration Bill, published in May 2022, includes relevant provisions regarding plan-making process, including setting out requirements for 'Gateway' checks during production to help spot and correct any problems at an early stage, repealing the Duty to Cooperate, the introduction of National Development Management Policies, and the addition of a new power to prepare 'supplementary plans', where policies for specific sites or groups of sites need to be prepared quickly.
- 5.5 While these new proposals could have significant impacts on the GCLP, the requirement for debate of the Bill, and once enacted the need for consultation on the detail, means that the proposed changes are unlikely to take effect until at least 2024. Further to this, government intends to set transitional arrangements, although there is no clarity at this stage what those will be. Government has stated that in the meantime it expects LPAs to continue to progress their emerging plans. As such, officers recommend continuing to prepare the GCLP as set out above, whilst monitoring the progress of these national proposals.

6 Implications

a) Financial Implications

Page: 14

The plans proposed and timetables are currently anticipated to be within current budgets. This will be kept under review alongside other work priorities.

b) Staffing Implications

The plans proposed are currently anticipated to be delivered within our existing staffing team. This will be kept under review alongside other work priorities.

c) Equality and Poverty Implications

The development plans will each be subject to Equalities Impact Assessment at each stage during their development.

d) Environmental Implications

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.

e) Procurement Implications

A large number of evidence base studies have been procured to support plan preparation.

f) Community Safety Implications

The plans provides an opportunity to address aspects of community safety that can be influenced by the physical environment.

7. Consultation and communication considerations

- 7.1 As set out in the report consultation and engagement are a key element of the plan making, and the changes to the process and timetable proposed seek to continue to enable an inclusive plan making process.

8. Background papers

Background papers used in the preparation of this report:

Greater Cambridge Local Plan – First Proposals consultation website,
November 2021

[Greater Cambridge Local Plan - First Proposals | Greater Cambridge Shared Planning \(greatercambridgeplanning.org\)](https://www.greatercambridgeplanning.org)

Current Greater Cambridge Local Development Scheme approved in October 2018 and updated in 2019

<https://www.cambridge.gov.uk/local-development-scheme>

9. Appendices

Appendix 1 - Greater Cambridge Local Plan First Proposals Consultation Report

Appendix 2 – Proposed revised Draft Greater Cambridge Local Development Scheme 2022

To inspect the background papers or if you have a query on the report please contact

Jonathan Dixon - Planning Policy Manager

Telephone: 07514 925952

jonathan.dixon@greatercambridgeplanning.org

Caroline Hunt – Strategy and Economy Manager

Telephone: 07849 824745

caroline.hunt@greatercambridgeplanning.org