

Appendix A: West Suffolk Local Plan (Regulation 19) Submission Draft consultation: Draft Response by Cambridge City Council and South Cambridgeshire District Council

Duty to Cooperate

This response to the West Suffolk Local Plan (Regulation 19) Submission Draft consultation is made by Greater Cambridge Shared Planning on behalf of Cambridge City Council and South Cambridgeshire District Council ('the Councils').

Overview

In response to this West Suffolk Local Plan (Regulation 19) Submission Draft consultation, the Councils are not raising concerns regarding soundness, legal compliance or the Duty to Cooperate. The Councils are making supporting representations to the following policies:

- Policy LP6 Water quality and resources
- Policy SP4 Green infrastructure
- Policy SP1 The climate and environment emergency and sustainable development and Policy LP1 Sustainable design and construction

The Councils have also made comment in relation to Policy SP12 Strategic Employment.

Transport

The Councils note the Local Plan directs development to the most sustainable locations to reduce the need for people to travel, while also supporting sustainable modes of travel, and seeks to ensure that the infrastructure needed to support new development is provided at the appropriate time. The Councils are not aware of any cross-boundary transport issues which will directly impact on the Greater Cambridge area. The Cambridgeshire and Peterborough Combined Authority and Cambridgeshire County Council are the local transport and highways authorities

respectively for the Greater Cambridge area. If these bodies in their responses to this consultation were to raise concerns that this Submission Draft Plan generated transport impacts upon Cambridge or South Cambridgeshire, the Councils would want to see these appropriately mitigated.

Correcting minor factual points:

West Suffolk Duty to Cooperate 2024 - Appendix A Record of Meetings

The Cambridge and Essex Authorities table records Cambridge City Council and South Cambridgeshire District Council as 'Greater Cambridgeshire'. This is factually incorrect. Officers from the Greater Cambridge Shared Planning service represent the combined area covered by two councils (known as Greater Cambridge) but the attendees should be recorded as Cambridge City Council and South Cambridgeshire District Council.

Preferred Options Duty to Cooperate 2022 - Appendix 2 Summary of responses received from neighbouring local authorities

Paragraph 8.2 incorrectly summarises the response from Cambridge City Council and South Cambridgeshire District Council as 'Greater Cambridge'. Whilst Greater Cambridge is the combined area covered by the two local authorities the planning authorities are Cambridge City Council and South Cambridgeshire District Council.

Policy LP6 Water quality and resources

Do you consider the document is Legally Compliant?

Yes

Do you consider the document is Sound?

Yes

Summary

This response to the West Suffolk Local Plan (Regulation 19) Submission Draft consultation is made by Greater Cambridge Shared Planning on behalf of Cambridge City Council and South Cambridgeshire District Council ('the Councils').

The Councils support Policy LP6 Water quality and resources and the requirement for measures which seek high standards of water efficiency for new residential and non-residential development. The Councils support the 100 litres per person per day water efficiency level for residential development, which goes beyond current Building Regulations, and is in line with the Government's intention set out in the Plan for Water for areas of serious water stress such as West Suffolk.

Maintaining and improving the quality of water and using it efficiently in a water stressed area is extremely important to avoid detrimental impact to the environment and the Councils are supportive of the recognition of these issues in the plan. Water cannot be considered just at a local authority level; water resources management is being considered at a regional level by Water Resources East and by the individual water companies in their Water Resources Management Plans (WRMP) (which are considered by the Environment Agency and approved by Defra).

The evidence supporting the Local Plan (West Suffolk Stage 2 Detailed Water Cycle Study 2023) shows that Anglian Water Services have concluded there would be a deficit in water supply to meet the demand if the 110 litres per head per day standard is followed and have therefore included supply and demand measures in their Water Resources Management Plan. It is vital that the Local Plan supports this with a policy that requires the highest possible standards of water efficiency in all new development.

Do you consider the document complies with the council's duty to cooperate?

Yes

Do you consider it necessary to participate at the Examination in Public?

No

Policy SP4 Green infrastructure

Do you consider the document is Legally Compliant?

Yes

Do you consider the document is Sound?

Yes

Summary

This response to the West Suffolk Local Plan (Regulation 19) Submission Draft consultation is made by Greater Cambridge Shared Planning on behalf of Cambridge City Council and South Cambridgeshire District Council ('the Councils').

The Councils support Policy SP4 Green infrastructure, in particular the opportunity to deliver cross boundary green infrastructure initiatives.

Given the regional (and indeed global) nature of both opportunities and impacts in relation to the climate and biodiversity emergencies, we support West Suffolk Council's policies which mitigate and adapt to climate change and conserve and enhance biodiversity, to improve health and wellbeing.

In common with West Suffolk Council, Cambridge City Council and South Cambridgeshire District Council have both declared climate emergencies and set out targets and initiatives to reach net zero by 2030, some of which can only be delivered through working in partnership. National policy (NPPF) states that all Local Development Plans must take a proactive approach to mitigating and adapting to climate change and ensuring resilience to climate change impacts, and ensure that new development avoids increased vulnerability to the impacts of climate change. The role the Green Infrastructure network (and Policy SP4) plays in meeting these criteria is substantial and is not to be overlooked.

Do you consider the document complies with the council's duty to cooperate?

Yes

Do you consider it necessary to participate at the Examination in Public?

No

Policy SP1 The climate and environment emergency and sustainable development and Policy LP1 Sustainable design and construction

Do you consider the document is Legally Compliant?

Yes

Do you consider the document is Sound?

Yes

Summary

This response to the West Suffolk Local Plan (Regulation 19) Submission Draft consultation is made by Greater Cambridge Shared Planning on behalf of Cambridge City Council and South Cambridgeshire District Council ('the Councils').

The Councils support sustainability policies SP1 The climate and environment emergency and sustainable development and LP1 Sustainable design and construction. In common with West Suffolk Council, Cambridge City Council and South Cambridgeshire District Council have both declared climate emergencies and set out targets and initiatives to reach net zero by 2030, some of which can only be delivered through working in partnership. Policies SP1 and LP1 align with the climate and zero carbon agendas adopted by the Councils and at a national level.

Given the regional (and indeed global) nature of both opportunities and impacts in relation to the climate and biodiversity emergencies, we support West Suffolk Council's policies which mitigate and adapt to climate change.

Do you consider the document complies with the council's duty to cooperate?

Yes

Do you consider it necessary to participate at the Examination in Public?

No

Policy SP12 Strategic Employment

Do you consider the document is Legally Compliant?

Yes

Do you consider the document is Sound?

Yes

This response to the West Suffolk Local Plan (Regulation 19) Submission Draft consultation is made by Greater Cambridge Shared Planning on behalf of Cambridge City Council and South Cambridgeshire District Council ('the Councils').

The Councils note that part (i) of this policy states that large scale strategic logistics proposals, typically more than 9,000 square metres floorspace per unit which are of a regional or national significance will not be permitted in the district, in order to ensure the identified needs of local businesses within the sub-region can be met locally, and that a sub-regional approach to site identification for regionally and nationally significant logistics provision will be taken.

It should be noted that South Cambridgeshire Local Plan 2018 Policy E/11: Large Scale Warehousing and Distribution Centres identifies that large scale warehousing and distribution centres will not be permitted in the district. The [Greater Cambridge Local Plan First Proposals sets out a similar policy direction](#), that large scale national and regional warehousing and distribution centres will not be supported in Greater Cambridge. This approach is justified in Greater Cambridge on the basis of the very high land take of this type of use, the local pressures on land supply for a range of uses including for employment space in support of key sector clusters specific to Greater Cambridge, well known infrastructure pressures, and the Green Belt location.

Do you consider the document complies with the council's duty to cooperate?

Yes

Do you consider it necessary to participate at the Examination in Public?

No