

# **Greater Cambridge Local Development Scheme Updated Addendum: Local Plan Timetable Update**



# November 2024

**Cambridge City Council** 

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This Greater Cambridge Local Development Scheme Addendum: Local Plan Timetable Update was approved by:

# **Cambridge City Council**

The Executive Councillor, Planning and Transport, following debate by the Planning and Transport Scrutiny Committee – 4 November 2024

# **South Cambridgeshire District Council**

Cabinet - 5 November 2024

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#### Introduction

- 1. This Greater Cambridge Local Development Scheme Updated Addendum provides an update regarding the Local Plan Timetable as set out below, and supersedes the previous Greater Cambridge Local Development Scheme Addendum published in March 2024.
- 2. Authorities are required to prepare a Local Plan Timetable (previously called the Local Development Scheme (LDS), a change made by the Levelling Up and Regeneration Act 2023) that identifies the expected timings for the production of new or revised development plan documents that set out the planning policy framework for Greater Cambridge. The Councils are required to keep the timetable up to date- and once the local plan timetable has effect, the local planning authorities must comply with it.
- 3. The latest formal timetable was agreed by the Councils in 2022. That document listed expected future timings for the emerging Greater Cambridge Local Plan (GCLP) and North East Cambridge Area Action Plan (NECAAP), both being prepared jointly between South Cambridgeshire District Council and Cambridge City Council. The timings set out in the 2022 LDS are now out of date or cannot be met and will need to be updated once there is sufficient certainty to identify formal revised programmes.
- 4. An update was made regarding the timetable in March 2024 via an Addendum to the 2022 LDS. The Addendum noted continuing uncertainties regarding key external dependencies for the emerging Greater Cambridge Local Plan (GCLP) in particular relating to water availability and transport strategy, as well as to the (now previous) Government's programme for Greater Cambridge. It also had regard to the proposed new plan-making system and a transitional date for plans to be submitted under the current plan-making system of end June 2025. Noting these uncertainties and that it would not be feasible to submit the GCLP by end of June 2025, the LDS Addendum included an indicative revised timetable for preparing the GCLP under the proposed new plan-making system, which would achieve the start of a formal 30-month process by autumn/winter 2025.
- 5. This Updated Addendum sets out a draft revised timetable for the GCLP, which is subject to the Government confirming the proposed new transitional date of December 2026.

# Key dependencies for determining a future GCLP timetable

6. As in March 2024, the primary external determinants of the future GCLP timetable centre upon water availability, the transport strategy, the Cambridge Waste Water Treatment Plant (CWWTP) via a separate Development Consent

Order (DCO) and the new national plan-making system. The previous Government also made a number of statements via the 'Cambridge 2040' initiative promoting much higher growth levels for Cambridge than in the emerging Joint Local Plan. The new government maintains a focus on Greater Cambridge's economic strengths, and as such, this initiative may also have implications for the local plan timetable that are unresolved at this time. These are all considered below.

#### Water supply

- 7. The report in March 2024 highlighted how the uncertainties regarding water supply in both the short and long term were impacting the ability to move forward the local plan.
- 8. Since March 2024, the Councils have continued to engage with the Government's Cambridge Water Scarcity Group that brings together relevant government departments and other stakeholders, including local authority officers. A range of actions are being developed by the group focusing on bringing forward supply options (in particular the pipeline linking to Grafham, and the Fens Reservoir), reducing demand through efficiency measures in new and existing buildings, and measures to improve the resilience of our watercourses.
- 9. Taking account of issues including progress on these actions, a number of planning permissions have been granted on strategic sites that were included in the adopted Local Plans. However, there are still issues to address before we have the certainty needed to inform the new local plan.
- 10. This includes understanding the outcome of the Water Resource Management Plan (WRMP) process. The statutory process for agreeing Cambridge Water's WRMP 2024 has continued to be delayed. On the advice of the Environment Agency, Defra has requested that further information is provided by Cambridge Water, who have been providing responses. It is not yet confirmed when a final decision will be made.
- 11. Further work is also being undertaken with the Water Scarcity Group to understand water availability in the long term 2040 and beyond. This is because even with the planned Fens Reservoir in place in the mid 2030's, water abstraction licences will be further reduced at 2040 as part of the Environment Agency's 'Environmental Destination' plans.
- 12. We have set out at each plan making stage the need for confirmation that a sustainable water supply is available to support development needs. We do not yet know the outcome in terms of water availability to inform the new local plan and in particular how much development can be planned for based upon available water supplies and whether or not this would meet our objectively assessed need for jobs and homes in full (subject also to other planning considerations including deliverability). We continue to engage with the Environment Agency, Cambridge Water, central government and other relevant stakeholders to seek to understand the evolving position.

13. Drawing on the above, the proposed draft revised timetable set out below is based upon the assumption that there is sufficient clarity regarding provision of a sustainable water supply by the end of the year to enable the plan to progress through key preparation stages, with evidence work supporting the strategy being progressed at risk ahead of this. If this clarity is not reached in time officers will need to explore with members the option to progress plan with outstanding uncertainties, stating the further assurances that the water industry need to provide.

# **Transport Strategy**

- 14. To ensure an appropriate development strategy in the GCLP, it is important that it is integrated with a Transport Strategy that ensures that: development can happen without significant adverse transport impacts; the plan addresses the challenges of climate change and local environmental impacts; and the development strategy is supported by sustainable travel options.
- 15. Transport modelling of previous stages of plan-making reflected the transport strategy contained in both the County Council's Transport Strategy for Cambridge and South Cambridgeshire (2014) that supported the adopted plans and the Cambridgeshire and Peterborough Combined Authority (CPCA) Local Transport and Connectivity Plan (2020, updated 2023). The earlier GCLP proposals therefore included an assumption regarding traffic reductions in the Cambridge urban area, but did not assume any particular scheme. This was to be delivered by the Greater Cambridge Partnership's (GCP) City Access proposals. Assumptions were also made about the role of the transport corridors and their impact on traffic movement alongside other planned infrastructure schemes including all the GCP radial public transport schemes.
- 16. The September 2023 decision by the GCP Board not to take forward the Making Connections proposal as part of the wider City Access programme, and to pause the Cambridge South East Transport Scheme (CSETS) due to rising programme costs (albeit noting that this project has now been un-paused, supported by additional government funding), presents a challenge to delivery of the levels of growth in the GCLP that needs to be resolved in order for the plans to proceed.
- 17. In terms of addressing the transport and environmental challenges that Making Connections and the wider City Access programme have been seeking to resolve, Greater Cambridge Partnership Executive Board papers from March 2024 identified that the issues would be progressed through the forthcoming Greater Cambridge Transport Strategy (GCTS). The Cambridgeshire & Peterborough Local Transport Connectivity Plan November 2023 (Greater Cambridge Local Section p5) previously identified that the GCTS would be a child document to the LTCP, led by the Combined Authority and developed with relevant local partners. Further to this, a paper taken to the Cambridgeshire & Peterborough Combined Authority Transport & Infrastructure Committee on 18 September 2024 provided the following update:
  - Over the summer, officers from the Combined Authority have been collaborating closely with officers from the Highways Authority, GCP and local

- planning authorities to establish the scope and timelines for the work and to begin evidence stocktake.
- The Chair of Transport and Infrastructure Committee (TIC) convened a Member Steering Group to have oversight of process and programme which will include representatives from the County Council, City of Cambridge, South Cambridgeshire District Council, and the Greater Cambridge Partnership. This group had its first meeting in September to consider suggestions for scope and programme. The Member Steering Group will not be decision making. Progress updates and, in the fullness of time, decisions on the GCTS will come to future meetings of the Transport and Infrastructure Committee.
- The programme will need to be aligned to the development of the Joint Local Plan for Greater Cambridge which itself will be affected by the new Government's approach to updating the National Planning Policy Framework (NPPF).
- 18. Drawing on the above, the draft revised timetable below is based upon the assumption that the technical and governance processes for the GCTS enable the timely progression of the GCLP. Greater Cambridge Shared Planning officers continue to engage with local partners to explore these points in detail.

### Government's planning reforms

- 19. At the time the March 2024 Local Plan timetable update was written, the then Conservative government had consulted on outline proposals for a new planmaking system, but had not confirmed details. Key to those proposals was a stated plan-making transition date such that any plans seeking to be adopted under the current plan-making system would need to be submitted to government by 30 June 2025. In March officers concluded that it was not possible to set a realistic timetable that would enable the GCLP to meet that deadline, even if the programme were to be compressed. As such the March Local Plan Timetable Update concluded that the GCLP would need to be prepared under the new plan-making system.
- 20. Since March 2024 the new government brought out a wide-ranging consultation on proposed amendments to the National Planning Policy Framework. As a part of this government announced its aim of implementing the new plan-making system as set out in the Levelling-up and Regeneration Act from summer or autumn 2025, and proposed that current system plans would need to be submitted for examination under the existing 2004 Act system no later than December 2026 a significant extension to the previous proposals referred to above. The proposals set out that this amended approach had the potential to benefit plans that are at earlier stages of preparation, and providing more time for local planning authorities to reflect on the revised NPPF and progress positive plans that will stand up to scrutiny at examination.
- 21. Given this consultation on changes to timings for submission under the current system, together with the overarching need to progress the plan to adoption as fast as reasonably possible, to provide certainty to all within Greater Cambridge

resident and business communities, officers have set out a revised draft timetable that seeks to meet the December 2026 deadline (see below).

# North East Cambridge Area - Cambridge Waste Water Treatment Plant relocation

- 22. Effective and efficient development of the North East Cambridge site is dependent on 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; this is the same for the NECAAP, noting that the Councils agreed in January 2022 a Proposed Submission NECAAP for future public consultation, contingent upon the separate Development Control Order being undertaken by Anglian Water for the relocation of the Waste Water Treatment Plant being approved.
- 23. At the time of the March 2024 update, the DCO Examination hearings were mostly concluded, and a decision was expected by the end of 2024. Since then the Examination closed in April, and the inspectors made their recommendation to the Secretary of State in the summer. Based on statutory DCO timings a decision on the outcome of the DCO was previously expected by the Secretary of State in October 2024. However, the Secretary of State for Environment, Food and Rural Affairs published a statement on 10 October that the deadline for the decision had been amended to 12 January 2025. If approved there will follow a 6 week judicial review period. If no request for judicial review is received within that period then the decision will be confirmed.
- 24. Notwithstanding the DCO process, a number of land parcels within the NEC area are already coming forward with planning applications ahead of the NECAAP or GCLP, that together are of a scale that would generate the need to review AAP evidence, vision and content. Further evidence is being prepared to inform planning decisions on appropriate scale of contributions required. Given the scale of emerging proposals, evidence being prepared by Cambridgeshire County Council in relation to transport impacts, indicates that to sustain growth above commercial floorspace levels assumed through the AAP (Reg 19) in combination with those schemes consented before July 2024, additional transformational transport infrastructure beyond currently identified schemes will likely be needed dependent on the mix and type of schemes coming forward. Such transport schemes will need to be explored via the CPCA's proposed GCTS referred to above.
- 25. The Councils will need to reflect on Secretary of State's decision on the DCO once confirmed. The future of the NECAAP will likely be confirmed via the proposed formal Local Plan Timetable in spring 2025 once timings are clearer, taking into account the other issues raised in this report. This will be done in the context of seeking to provide a clear planning framework for this key strategic site as soon as possible.

## Cambridge 2040/Cambridge Delivery Group

- 26. In Summer 2023, the previous Government announced its intention to significantly increase levels of development in Cambridge beyond the levels outlined in the First Proposals. It established a "Cambridge Delivery Group" to progress that ambition. Peter Freeman, the Chair of Homes England, was appointed to lead that programme and the Group have subsequently commissioned a number of studies. Engagement with Peter Freeman and the team of civil servants tasked with bringing forward the Government's proposals has been ongoing since that time. As referred to in the Water Supply section, in the autumn of 2023, the Government also established a "Water Scarcity Group" with dedicated funding to explore the particular challenges associated with water scarcity that impact the area's current and potential future growth.
- 27. The new government continues to focus attention on Cambridge, but the Minister for Housing in a letter to local leaders explicitly stated his intention to "reset the work and the relationship between central government and local partners". Senior officers and the Leaders of the Councils continue to be in regular dialogue with Government to seek to understand what this means in practice, including how and in what way the Government's ambitions will interact with, and impact on, the Local Plan process. Given the new government's stated intention to collaborate with local partners, officers assume that this programme will not impede the progression of the GCLP. However, given the ongoing uncertainty on these specifics, officers are not at present able to determine what the impact of this national project on the local plan or its timetable will be.

### Additional factors that could affect the future programme: East West Rail

28. As in March 2024, the proposed Cambourne station associated with East West Rail forms a further uncertainty in terms of confirmation of the scale and timing of the expansion of Cambourne identified in the GCLP First Proposals that could in principle affect the Local Plan Timetable. Regarding the rail line and station proposals led by East West Rail Company, the Councils will need the project to have a level of certainty regarding its delivery and timing to enable the plan to progress to submission. Regarding the development opportunity at Cambourne, since March Council officers have developed an evidence base commission for procurement, working alongside East West Rail Company, with the intention that this would build upon the earlier identification of a growth opportunity at Cambourne to support the identification of a draft allocation within the next stage of the GCLP (officers have secured funding in principle from Department for Transport to commission this work; this agreement is expected to be confirmed as part of Government's Spending Review due on 30 Oct. (This point will be updated following committees). Officers' current view is that the progression of the rail line and station DCO project, and associated work developing an allocation at Cambourne, can be progressed in a way that supports the draft revised timetable.

#### What this all means for the GCLP Timetable

29. Drawing on the above, given the new government's proposed change in timings for submission of plans under the current system, together with the overarching need to progress the plan to adoption as fast as reasonably possible, officers have identified an indicative revised timetable that meets the December 2026 transition cut-off date.

#### **Draft revised GCLP timetable**

Autumn/Winter 2025	Draft Plan Consultation (Reg 18)
Summer/Autumn 2026	Proposed Submission Plan Consultation (Reg 19)
Winter 2026 (by Dec 2026 as per current NPPF consultation)	Submission to Secretary of State for independent Examination (Reg 22)

- 30. It is important to note that the above draft revised timetable is very tight; any slippage in any stage would likely move the submission date beyond government's proposed deadline of December 2026. Noting this challenge, the timetable is based upon a number of assumptions set out below. The risks section below explores further how officers propose to mitigate the risks of each of these factors impeding plan progress.
- 31. With regard to the external dependencies explored above, the draft revised timetable is based upon the following assumptions:
  - Water supply: that there is sufficient clarity regarding provision of a sustainable water supply to enable the plan to progress through key stages, with evidence work supporting the strategy being progressed at risk ahead of this. If this clarity is not reached in time officers will need to explore with members the option to progress plan with outstanding uncertainties, stating the further assurances that the water sector need to provide and including clear policy requirements that delivery of development would be conditioned on appropriate water supply being available. While the Councils continue to seek to influence this issue, responsibility for water supply lies with Cambridge Water, government and Water Resources East. For now this issue remains a high risk to the progression of the GCLP.
  - <u>Transport strategy</u>: that there will be technical evidence and political
    agreement of proposed solutions for the GCTS enable the timely progression
    of the GCLP. Responsibility for transport policy lies with the Combined
    Authority. Identifying a sustainable and deliverable transport strategy in a
    timely way to support the emerging GCLP remains a very high risk, both in

- relation to ensuring the practical alignment of programmes, but also noting the potential political sensitivity of solutions
- <u>Cambridge Waste Water Treatment Plant relocation</u>: that the Secretary of State makes a positive decision regarding the DCO within updated statutory timescales, and a judicial review does not prolong the process beyond confirmation of the Reg 19 Proposed Submission Plan.
- <u>Cambridge 2050 programme</u>: that the new Government's approach to Cambridge does not impede the timely progression of the GCLP.
- <u>East West Rail</u>: that the progression of the rail line and station DCO project, and associated work developing an allocation at Cambourne, is progressed in time to support the draft revised timetable.
- 32. Even assuming the above external factors support the timely progression of the GCLP as set out above, it is important to note that the revised draft timetable is a challenging one in terms of the practicalities of developing the plan. The draft revised timetable is based upon the following assumptions about internal Council processes:
  - <u>Efficient progression through plan stages</u>: that it is not necessary to do substantial further work or changes to the Plan between Reg 18 Draft Plan consultation and Reg 19 Proposed Submission publication. Note that no material changes can be made after Reg 19 without further consultation, which would not achieve the December 2026 submission deadline.
  - Governance: that both Councils can agree the Local Plan via their separate governance processes, at all key stages, including agreeing the proposed final version of the plan (Proposed Submission) in June-July 2026 and its subsequent submission for independent Examination by December 2026.
  - Evidence base findings support the identification of a deliverable and viable plan in time to support the proposed timetable.
  - <u>Team resources</u>: that the Planning Policy and Strategy team is able to focus its full resource on the GCLP at key points in the process, and that resources are available to enable preparation for consultation to take place alongside completion of the plan and Member processes at both Reg 18 and 19 stages.
  - <u>Processing Representations:</u> that Proptech and other innovative processes, including AI, enable much faster processing and summarising of consultation responses than has previously been achieved.

#### **Next steps**

33. Given that the NPPF proposals are currently in draft form for consultation, and that the CWWTP DCO decision has yet to be confirmed, it is not possible to confirm the draft revised timetable set out above at this time. As such, officers propose that the Local Plan Timetable - for the GCLP and also the North East Cambridge Area Action Plan (NECAAP) - should be fully updated in spring 2025, once the government has reported its response to the current consultation on NPPF revisions and confirmed the transitional date, and once the Cambridge

Waste Water Treatment Plant (CWWTP) Development Consent Order (DCO) outcome is known.