

# Cambridge City Council

## Record of Executive Decision

### Response to Uttlesford Local Plan (Regulation 19) Submission Draft consultation

Decision of: Councillor Thornburrow, Executive Councillor for Planning, Building Control and Infrastructure

Reference: 24/URGENCY/S&R/14

Date of decision: 01/10/24 Date of Decision Published: 10/10/24

Decision Type: Non-Key

Matter for Decision: Response to Uttlesford Local Plan (Regulation 19) Submission Draft consultation

Why the Decision had to be made (and any alternative options): The Uttlesford Local Plan (Regulation 19) Submission Draft consultation runs between 8 August and 14 October 2024. As a response is required to be submitted within these dates the response is unable to be considered at the next Planning and Transport Scrutiny Committee on 4 November 2024 and must be considered out of cycle. The contents of the Uttlesford Local Plan (Regulation 19) Submission Draft consultation could in principle impact on Greater Cambridge and have implications for the emerging joint Greater Cambridge Local Plan. The proposed response seeks to minimise negative and maximise any positive impacts of Uttlesford's Local Plan on Greater Cambridge. Given the proximity of Uttlesford to South Cambridgeshire, the contents of the Uttlesford Local Plan could in principle impact on the emerging joint Greater Cambridge Local Plan, and a joint response from Greater Cambridge is recommended.

Background: The Submission Draft is the final stage in the preparation of this plan. Uttlesford District Council previously consulted on the Draft Plan (Regulation 18) in November to December 2023, to which joint responses were made by Cambridge City Council and South Cambridgeshire District Council. Responses to this final submission draft will be sent alongside the Local Plan and supporting evidence to be examined by an independent inspector appointed by the Secretary of State.

The Local Plan contains planning policies and allocations for the growth of Uttlesford over the plan period from 2021 to 2041. It contains the council's Spatial Vision and

Strategic Objectives grouped under the 'environmental', 'economic' and 'community/social' headings that run throughout the plan. The Spatial Strategy identifies the appropriate locations for development, the level of housing to plan for, the amount of employment land to meet their needs to maintain and develop the local economy and to provide a range of services, as well as the facilities and infrastructure needed. It also seeks to address the challenges of climate change, support biodiversity Net Gain, achieve sustainable development and protect the environment.

The Spatial Strategy is underpinned by five core policies; addressing climate change; meeting our housing needs; settlement hierarchy; meeting business and employment needs; providing and supporting infrastructure services. The Plan identifies four Area Strategies and also includes a series of district-wide policies.

Content in the Uttlesford Local Plan (Regulation 19) Submission Draft relevant to Greater Cambridge includes:

- Exceeding their objectively assessed development needs – the identified need is for 13,500 homes in the period April 2021 to March 2041 and 14,741 homes have been planned for, to provide for flexibility and contingency and help maintain a five-year land supply (Core Policy 2).
- No strategic housing allocations proposed close to the South Cambridgeshire boundary.
- Growth is directed to the most sustainable settlements which have the existing infrastructure and/or capacity to expand infrastructure and reduce the necessity of car use wherever possible.
- Provision of employment land to meet the employment needs assessment, including office and R&D (19 hectares) and industrial and logistics (38.5 hectares) (Core Policy 4).
- Great Chesterford Research Park, close to the South Cambridgeshire boundary, is allocated for R&D (13.5 hectares) (Core Policies 4 and 6).
- The plan recognises the issue of water stress in the district and wider area and the impact this is having on chalk streams, and proposes measures which seek high standards of water efficiency for new residential and non-residential development (Core Policy 34).
- The plan seeks to address the climate and ecological emergency, including by requiring higher energy standards than Building Regulations Part L requiring that new buildings are designed and built to be Net Zero Carbon in operation, and 20% Biodiversity Net Gain (Core Policies 1 and 40).

## Water

The Councils' response to the Uttlesford (Regulation 18) Draft Plan consultation raised concern over whether the overall demand for water resulting from the growth proposals in the Draft Local Plan has been considered in relation to regional water plans and Affinity Water's latest WRMP24, and that the level of abstraction required to support development proposed in the draft Local Plan is sustainable.

The Councils' Regulation 18 response also suggested Core Policy 34 could be more explicit on how a development must contribute to achieving 'good' status and must not lead to a reduction in groundwater levels or flows in watercourses. The policy does not provide any required levels of water efficiency for new non-household developments, which should be included. The benefits of integrated water management in new development could be drawn out more in the policies. The Policy could seek opportunities for aquifer recharge through appropriate land management.

Uttlesford District Council has published updated evidence for the Regulation 19 Submission Draft Plan (Water Cycle Study and Chalk Stream Evidence) which provides clarification on a number of issues raised in the Councils' Regulation 18 response and amendments have been made to Core Policy 34 Water Supply and Protection of Water Resources to reflect the updated evidence. The evidence base shows water supply has been considered with the Environment Agency and takes account of water company plans; the wording in Core Policy 34 is now firmer, requiring demonstration of measures to minimise consumption; supports developments that achieves at least 90l/p/d for residential and now includes a requirement of non-residential to achieve at least 3 credits in BREEAM Wat01. In addition, Policy 35 seeks to protect and enhance watercourses including valuable chalk streams; with further clarity provided in the supporting text at paragraph 9.136 which details the types of mitigation responses and paragraph 9.137 outlines ways of improving ecological condition of waterways which are encouraged.

The updated evidence base and amendments to policy address the Councils' previous concerns.

## Chesterford Research Park employment allocation

In response to the Regulation 18 consultation the Councils sought clarification on the transport impacts of the employment allocation, noting the Transport Evidence Topic Paper and Infrastructure Delivery Plan made no reference to the impact of additional job provision on travel patterns or infrastructure need.

Further transport evidence has been published alongside the Regulation 19 Submission Plan which shows the Local Plan site allocations, coupled with employment growth within South Cambridgeshire (at Wellcome Genome, Babraham

Research, Granta Park and Cambridge Biomedical Campus), will have an impact on M11 Junction 9a Stump Cross. The evidence reports this is expected to add to queuing and delays on the southbound slip and that it is likely an improvement scheme will need to be delivered with National Highways, Essex County Council and South Cambridgeshire District Council. It also reports that a mitigation scheme to widen the slips could alleviate the Local Plan growth back to the Reference Case (committed growth) scenario, but the approaches to the junction would remain over capacity and that these would not be the responsibility of Uttlesford District Council since it is caused by increasing committed and background traffic flows rather than the Local Plan traffic.

There is no further detail within the Regulation 19 Submission Plan in relation to the transport impacts of Chesterford Research Park allocation. Core Policy 4 Meeting Business and Employment Needs has been amended to support development at the allocated sites where they meet the requirements set out within the Site Development Frameworks, as well as being in accordance with the Area Strategies. The Chesterford Research Park Site Development Framework (in Appendix 2b) incorporates a Framework Plan and a series of issues that should be addressed by any design proposals, under broad headings; Design Principles, Transport, Heritage, Landscape and Green Infrastructure and Biodiversity. In transport terms this seeks to ensure improved accessibility by active modes and public transport, although also listed are; delivering improvements to junctions as identified in the transport evidence, and seeking contributions to transport and highway infrastructure identified in the Infrastructure Delivery Plan. However, there are no references in Plan Policy or Infrastructure Delivery Plan on to the need to improve M11 Junction 9a.

Officers are exploring the transport implications with Cambridgeshire County Council as local highway authority and Cambridgeshire and Peterborough Combined Authority as local transport authority, but at the time of writing had not received a response. As such the proposed response notes that this issue is currently unresolved, and notes that the Councils' response to the issue will be led by the comments of Cambridgeshire County Council and Cambridgeshire and Peterborough Combined Authority, as the local highway and transport authorities for Cambridgeshire.

#### Climate and biodiversity policy approaches

The Councils supported the ambitious climate and biodiversity policy approaches, including a requirement for 20% Biodiversity Net Gain as these align with the Councils' own priorities and ambitions.

## Statement of Common Ground

The Localism Act 2011 sets out the Duty to Co-operate and as part of its duties Uttlesford District Council has prepared a Statement of Common Ground (SoCG), which is a publicly accessible document of whether agreement has been reached between the Councils on cross-boundary strategic issues. The purpose of the SoCG is to document the cross-boundary matters being addressed and progress in co-operating to address them. As the content of the SoCG is a factual representation of the comments the Councils make to the Regulation 19 Submission Draft Local Plan officers have delegated authority to sign-off the content and it does not form part of this decision.

The proposed response, set out in Appendix 2, focuses on matters which could impact on Greater Cambridge and include water stress and the impact this is having on chalk streams, housing and employment growth and allocated sites (in particular Chesterford Research Park employment allocation), addressing the impacts of climate change and nature recovery.

Alternative options:

1. The options are:
  - a. Agree the proposed response to the consultation without amendments
  - b. Agree the proposed response to the consultation with amendments
  - c. Decide not to submit a response to the consultation – this option is not recommended as the plan would progress without awareness of potential impacts on Greater Cambridge

The Executive Councillor's decision:

[Proposed]

- Agree the proposed response to the consultation at Appendix 2
- Delegate authority to the Joint Director for Planning to agree any minor amendments to the response agreed by South Cambridgeshire District Council that are consistent with the response at Appendix 2.
- Note that the content of the Statement of Common Ground will reflect the agreed response.

Reason for the decision: as detailed above.

Report: Appendix 1 - Background Papers and Appendix 2 - The Uttlesford Local Plan (Regulation 19) Submission Draft Consultation proposed joint response from Greater Cambridge.

Scrutiny Consideration: The Chair and Spokesperson of Planning and Transport Scrutiny Committee were consulted prior to the action being authorised.

The Liberal Democratic Services Opposition Spokesperson, Councillor Porrer made the following comments: *I am very pleased to see that Uttlesford have now taken on board our previous comments about water usage and reduction and that this is now reflected in their new submission.*

*I am not sure how efficient BreeamWat01 3 credits is for non-residential (I know that the full credits are five rather than three so I am not sure why these cannot be achieved or whether this is something that is not possible outside domestic use?) but I'll be guided by officers and if you feel that that the lower credits are reasonable for non-domestic use, then I am happy for this to go forward*

The comments were addressed by the Senior Planning Policy Officer.

Conflict of interest: None.

## Appendix 1: Background Papers

Background papers used in the preparation of this report:

Emerging Greater Cambridge Local Plan

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

Uttlesford Local Plan consultation documents:

- Uttlesford Local Plan (Regulation 19) Submission Draft consultation documents [Local Plan \(Regulation 19\) consultation - Uttlesford District Council](#)
- Uttlesford Local Plan (Regulation 19) Submission Draft evidence documents [Regulation 19 Evidence Base - Uttlesford District Council](#)

### Report Authors:

Claire Spencer – Senior Planning Policy Officer

Telephone: (01954) 713418

Stuart Morris – Team Leader - Planning Policy & Strategy

Telephone: 07514 925 287

## **Appendix 2: Uttlesford Local Plan 2021 – 2041 (Regulation 19) Consultation – proposed consultation response**

This response to Uttlesford District Council's Local Plan (Regulation 19) consultation is made by Greater Cambridge Shared Planning on behalf of Cambridge City Council and South Cambridgeshire District Council.

### **Water Stress**

The Councils are supportive of the recognition in the plan of the issues of water stress in the District and the wider area, and the impact that this is having on chalk streams. The headwaters of the River Cam, the River Granta, flow through Uttlesford District and then into Greater Cambridge, and therefore impacts due to abstraction and from pollution will have a direct impact on water flow and water quality downstream. 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 Water Resources South 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 two Councils have worked together with Uttlesford District Council to ensure that our Local Plans each have strong integrated water management policies, with the aim of protecting and enhancing the rare chalk streams in our areas.

The Councils note the updated evidence supporting the Regulation 19 Local Plan, including Water Cycle Study and Chalk Stream Evidence.

### **Core Policy 34 Water Supply and Protection of Water Resources (SUPPORT)**

The Councils support the inclusion of standards for residential development that achieves at least a water efficiency standard of 90 litres per person per day and for non-residential development to achieve at least three credits under the BREAAAM Wat01 measure. These measures reflect the findings of the water evidence base; Water Cycle Study and Chalk Stream Evidence Base and are necessary to reduce water use from new developments in an area of serious water stress.

### **Core Policy 35 Watercourse Protection and Enhancement (SUPPORT)**

The Councils support the aims of Policy 35 which seeks to protect and enhance watercourses including valuable chalk streams, and note that further clarity is provided in the supporting text at paragraph 9.136 which details the types of



mitigation responses and paragraph 9.137 outlines ways of improving ecological condition of waterways which are encouraged.

### **Transport implications - Chesterford Research Park employment allocation**

The Councils are concerned to ensure that the transport impacts of the allocations for development proposed in the Local Plan, including Chesterford Research Park employment allocation, are appropriately mitigated to ensure no adverse transport impacts on Greater Cambridgeshire.

The Councils note the updated transport evidence supporting the Regulation 19 Local Plan reports that there will be an adverse impact on the M11 junction 9a Stumps Cross such that an improvement scheme to widen the southbound slip roads will need to be delivered to enable the Local Plan growth.

### Policy 4 Meeting Business and Employment Needs & Core Policy 6 North Uttlesford Area Strategy (OBJECT)

The Councils note the policy approach to support development at the allocated employment sites where they accord with the Area Strategies and meet the requirements set out within the Site Development Frameworks. The Chesterford Research Park Site Development Framework (in Appendix 2b) incorporates a Framework Plan and a series of issues that should be addressed by any design proposals. In transport terms this seeks to ensure improved accessibility by active modes and public transport, which is consistent with national policy.

However, in terms of ensuring appropriate mitigation of vehicular trips generated by Chesterford Research Park, at the time of writing the Councils' concerns raised at draft plan stage have yet to be addressed.

The Councils also note the transport evidence reports that there will be an adverse impact on the M11 junction 9a such that an improvement scheme will need to be delivered to enable the Local Plan growth, but it is not clear whether there is an identified mechanism for delivering such a scheme.

The Councils' final response on these matters will be led by views of Cambridgeshire County Council and Cambridgeshire and Peterborough Combined Authority, as the local highway and transport authorities for Cambridgeshire.

### Supporting text to Core Policy 6 (OBJECT)

There is a factual inaccuracy in paragraph 5.21, which refers to "...the Government's proposals for substantial development in the Cambridge area in the longer term..."

Whilst the Government has ambitions for further growth in the Cambridge area at the present time there are no firm proposals.

Policy 40 Biodiversity and Nature Recovery (SUPPORT)

The Councils support the ambitious climate and biodiversity policy approaches in the Local Plan, including the requirement for development proposals to demonstrate a minimum of 20% Biodiversity Net Gain.