

By Email
from localplan@centralbedfordshire.gov.uk
to localplan@greatercambridgeplanning.org

Your ref:
Our ref:
Date: 13/12/2021

Dear Sirs,

Greater Cambridge Local Plan 2041: First Proposals Stage Regulation 18 Consultation November 21

Introduction

Thank you for consulting Central Bedfordshire Council (CBC) on the first proposals consultation for the Greater Cambridge Local Plan 2041. Please accept this letter as our formal response. We welcome the opportunity to respond to the proposals in this consultation and look forward to continuing the good working relations that CBC has already forged with the two substantive authorities.

We have provided some comments below on the consultation documentation which we hope are useful. Please do not hesitate to contact us if you have any further questions.

General Comments on Strategy

Overall, the Council supports the approach you have taken in terms of undertaking a joint local plan to ensure a consistent approach to planning and building across both Cambridge City Council and South Cambridgeshire District Council up to 2041.

We support the proposed Vision for the Greater Cambridge Plan especially as it places climate impacts at the heart of key decisions. It states that Greater Cambridge will be a place where a big decrease in your climate impacts comes with a big increase in the quality of everyday life for all your communities. It also promotes new development minimising carbon emissions and reliance on the private car; creating thriving neighbourhoods with the variety of jobs and homes you need; increasing nature, wildlife and green spaces; and safeguarding your unique heritage and landscapes. CBC considers this to be a laudable, succinct overarching Vision that we hope you will be able to carry through to effective policy and decision-making on the ground.

CBC considers that the proposed strategy outlined within the First Proposals could help ensure that Greater Cambridge makes a valuable contribution to the Oxford to Cambridge Arc and to the overall delivery of the Government's ambitious growth

aspirations. However, the Council considers that it would be useful to include reference to the emerging Arc Spatial Framework, identifying that alongside the NPPF, this will set the overarching strategic framework for the area with which all local plans within the Arc must accord. CBC would be keen to understand the timescales for the delivery of the Greater Cambridge Plan and how the emerging Spatial Framework will be taken into consideration to inform future iterations of the plan.

We appreciate that the Plan is at an early stage of development, and at the current time you are considering locations that could be delivered alongside allocated sites being carried forward from the adopted 2018 Local Plans for Cambridge and South Cambridgeshire, as well as sites which already have planning permission.

We note that you are proposing to meet in full your objectively assessed needs of 44,400 new homes to 2041, which is supported by CBC and is necessary to ensure needs can be met across the area.

CBC recognises that Cambridge has seen significant economic and jobs growth in recent years and that there is an ambition to maintain this direction of growth as the impacts of the recent pandemic subside. As stated in our comments made in response to your Issues and Options Consultation in February 2020, we would not support a level of jobs growth that could detrimentally impact upon the ability of neighbouring authorities, such as Central Bedfordshire, to meet and deliver their own economic ambitions and growth aspirations. CBC therefore supports the housing numbers proposed to meet the OAN and the identified buffer and welcomes the move away from the higher job number which were put forward in your Issues and Options consultation. We agree that the higher jobs forecast previously considered would not be the most appropriate scenario to pursue.

Overall, CBC considers that the proposed level of housing of 44,400 new homes and complementary economic growth of 58,500 new jobs across all sectors including business, retail, leisure, education and healthcare, is an appropriate level of growth to deliver for over the plan period.

The First Proposals have suggested 19 new possible locations that might be suitable for additional development to meet your needs across the Greater Cambridge area up to 2041. Overall, CBC supports the proposed approach taken to the geographical spread of these sites and welcomes the inclusion of sites in the most sustainable locations around the Cambridge urban area and on the outskirts of the City, where existing and future residents can take most advantage of the proximity to jobs and services using public transport and active travel options. The proposals to direct development to where it has the least climate impact, where active and public transport is the natural choice is logical and fully supported.

It is noted that the consultation material suggests that the majority of your objectively assessed need can be provided for in the core preferred strategic sites of North East Cambridge, Cambridge East and Cambourne. This approach is supported as the locations will reduce potential climate impacts through the delivery of well connected, sustainable, compact development where active and sustainable travel can be maximised.

CBC have not provided detailed comments on all of the proposed 19 sites included within the consultation material but note the proposals for new strategic scale development at Cambourne which lies in close proximity to Central Bedfordshire. It is noted that in total, there are 3 development sites proposed for Cambourne - two of these are existing allocations; Cambourne West which has capacity for 2,590 units and Bourn Airfield which has capacity for 2,460 units, alongside a new proposed broad location for growth at Camborne - expected to deliver 1,950 homes.

CBC recognises that whilst a final decision has not yet been announced, the preferred East West Rail route between Bedford and Cambridge will likely result in a new stopping station at Cambourne and that this will transform the area, maximising sustainable opportunities for growth. Whilst we support the opportunities that the proposed new station would potentially bring, CBC would suggest that any future transport impact assessments and traffic modelling associated with the proposals should consider the cumulative impacts of both existing and proposed development at Cambourne and any implications for the wider area, including potential impact upon the strategic and local road network within Central Bedfordshire. It is likely that there will be cumulative impacts from growth at Cambourne on communities within CBC related to an increase in demand on the A1, particularly if / when the A428 dualling and Black Cat works are carried out, and also the more minor roads through areas like Pottton, Sandy, Biggleswade. Whilst outside of the Greater Cambridge plan area, the capacity of the A1 in this area is already a key concern that affects a much wider area and must be considered carefully and comprehensively when decisions are being made in relation to future growth.

We would, therefore, welcome further engagement to understand the scale of those impacts and their likely implications for Central Bedfordshire communities as the work on the local plan and the sites themselves, progresses. We would welcome being involved in early engagement with National Highways in relation to these impacts. We would also be keen to look at opportunities to secure sustainable links (via public transport) between CBC and the development areas to the west and south of the Greater Cambridgeshire area.

As noted above, whilst a formal decision is yet to be announced in relation to EWR between Bedford and Cambridge, or indeed the location of a new stopping station at either Tempsford or to the south of St Neots, CBC consider it essential that the Greater Cambridge Plan considers the wider context of strategic growth within the Arc, particularly in terms of future connectivity opportunities that will undoubtedly arise as proposals within neighbouring authority areas emerge.

Your approach to enabling some development within smaller villages is supported as this will support rural services and the vitality and viability of villages and their shops and services contributing to overall sustainability. We appreciate that it is unsustainable to encourage high levels of growth where car travel predominates and that therefore, in smaller villages you will continue to support infill development and affordable housing on suitable sites only. This approach is supported, especially given the very rural nature of the areas close to the Central Bedfordshire border.

The 7 Themes

We welcome the approach taken in this consultation to identify 7 key themes and we have provided some high-level comments on each of them below. It is understood that each of the themes will influence how you will plan homes, jobs and infrastructure and ultimately where growth will be directed. In our previous response to the Issues and Options stage of consultation (February 2020) we suggested that “connectivity” both within and beyond the Greater Cambridge area should perhaps be considered as an additional theme. Whilst we note this suggestion has not been taken onboard, CBC considers that connectivity is the ‘golden thread’ that runs through all the key themes and could potentially be referenced as such within the Greater Cambridge Plan.

Climate Change

We support your aim to help Greater Cambridge to transition to net zero carbon by 2050 through a number of comprehensive measures including ensuring that development is sited in places that help to limit carbon emissions, is designed to the highest achievable standards for energy and water use and is resilient to current and future climate risks.

It is clear that responding to climate change has influenced the shape of the plan as an important factor in determining where future development should be located and how it should be built. CBC would be keen to have future conversations to share experiences and to understand how net zero carbon can be achieved in terms of viability, and to explore how this can be monitored to ensure the approach is successful.

In terms of detailed policy, Policy GP/QD could benefit by also referring to building orientation to maximise the opportunities for renewables.

Biodiversity and Green Spaces

We support your aim for biodiversity and green space policies to increase and improve your extensive network of habitats for wildlife and green spaces for people, ensuring that development leaves the natural environment better than it was before.

We also welcome confirmation that the Oxford to Cambridge Arc Environmental Principles have informed your approach to this theme, in particular, we welcome and support the ambitious policy to require 20% Biodiversity Net Gain. As this will be an issue for all Local Authorities within the Arc, CBC would also be keen to discuss how this could be delivered and the impacts this might have not only on site viability, but the delivery of other key services and facilities across the Arc .

Wellbeing and Social Inclusion

We support your aim of helping people in Greater Cambridge to lead healthier and happier lives ensuring everyone benefits from the development of new homes and jobs.

Great Places

We support your aim for the delivery of great places through policies that sustain the unique character of Cambridge and South Cambridgeshire and compliment the area with beautiful and distinctive new development, creating a place where people will want to live, work and play.

The themes from the Cambridgeshire Quality Charter for Growth covering the four “Cs” of Community, Connectivity, Climate and Character is a sensible approach consistent with the National Model Design Code.

Jobs

CBC supports the aim of your proposed jobs policies in terms of encouraging a flourishing and mixed economy which includes a wide range of jobs while maintaining the areas global reputation for innovation. The Council considers the policies are positive and forward thinking in the current climate in that they seek to reflect how the approach to working environments is changing, by supporting remote working and improving facilities on employment parks.

We support the inclusion of a remote working policy but consider that it could be strengthened to refer to the provision of home office space in new dwellings as the emphasis is currently on the delivery of external hubs or extensions of existing dwellings.

Homes

As commented above, the Council supports the proposed strategy to plan for and deliver enough housing to meet your objectively assessed needs, including significant amounts of affordable housing and a mix of tenures to suit your diverse community's needs. The proposed policy requiring 40% affordable housing in new developments is particularly supported.

Infrastructure

We support the approach taken that the relationship between jobs and homes and sustainable transport opportunities has been a key consideration and influence of the development strategy proposed. Recognising that infrastructure is not limited to the provision of new roads, CBC also supports the recognition for the need to consider and plan for water, energy and digital networks, and health and education and cultural facilities in the right places and at the right times to ensure your growing communities are supported. Looking to the future, your policies on electric vehicle charging points and digital infrastructure will be key given the need to move away from carbon-based vehicle fuels and the shift to homeworking that has been accelerated by the pandemic.

We also note that whilst there is an objective for Air Quality within the Sustainability Appraisal, there is no objective included for Transport and Access.

We welcome this opportunity to comment on this latest stage of your development plan proposals and largely offer our support to the approach you have taken. We also appreciate how you have digitally presented and structured the documentation in order to make it as accessible as possible to everyone. The use of maps and diagrams throughout the document is an effective way of setting out the context and portraying the information within the text. In addition, the ability to explore the documentation through the “themes” and “maps” is a particularly helpful way of organising the consultation.

I hope you find these comments useful and look forward to continued engagement as your plan progresses.

Yours sincerely,



Caroline Danby
Head of Strategic Growth