

## South Cambridgeshire Local Plan

# Statement of Compliance with the ‘Duty to Co-operate’

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**Proposed Submission Local Plan for South Cambridgeshire  
Statement of Compliance with the 'Duty to Co-operate'  
17th June, 2013**

**Update February 2014**

**1.0 Introduction**

- 1.1 The duty to co-operate was created in the Localism Act 2011 and amends the Planning and Compulsory Purchase Act 2004 accordingly. It places a legal duty on local planning authorities and other bodies to co-operate with each other to address **strategic issues** relevant to their areas. The duty requires on-going constructive and active engagement on the preparation of Local Plans and other activities relating to the sustainable development and use of land, in particular in connection with strategic cross boundary matters.
- 1.2 The National Planning Policy Framework (NPPF) (para 181) states that 'Local planning authorities will be expected to demonstrate evidence of having successfully co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination'. The NPPF (para 181) continues by advising that evidence of cooperation can take the form of 'plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position.'
- 1.3 This Statement of Compliance with the 'Duty to Co-operate' accompanies the Submission of the South Cambridgeshire Local Plan and sets out how the District Council has co-operated with other bodies in its production.

**2.0 Memorandum of Cooperation**

- 2.1 The Cambridgeshire local authorities and Peterborough City Council have agreed the **Cambridgeshire & Peterborough Memorandum of Co-operation: Supporting the Spatial Approach 2011-2031**, published in May 2013. The Memorandum, which was agreed by South Cambridgeshire District Council on 27 June 2013, recognises the primary role that individual local authorities have in addressing the duty to co-operate through their statutory Local Plans. The overarching aim of the Memorandum is to provide additional evidence that the duty has been addressed. It does this by demonstrating that the emerging district-level development strategies contribute to an area-wide strategic vision, objectives and spatial strategy, by addressing strategic spatial planning issues across the area. In this sense it fulfils the role envisaged for jointly-prepared, non-statutory documents in the NPPF.

- 2.2 The Memorandum sets out the agreed vision and objectives for the long-term development of Cambridgeshire and Peterborough, an overview of the evidence for future levels of growth, and the broad spatial approach that will help realise the vision and the area's growth needs. These issues form the first part of the Memorandum, to support the submission of Local Plans. It includes agreement on the continuation of the sustainable development strategy first set out in the 2003 Structure Plan.
- 2.3 The Memorandum also addresses how the objectively assessed housing needs for each of the Districts in the Cambridge Sub-Region Housing Market Area will be provided, to meet the requirements of the NPPF. It includes an additional Memorandum of Cooperation (as its Appendix 1) between the seven districts within the housing market area (the Cambridgeshire local authorities plus the west Suffolk districts of Forest Heath and St Edmundsbury), together with Peterborough City Council. The memorandum sets out the agreed level of provision by district in order to meet the overall identified need for additional housing within the Cambridge Sub Region Housing Market Area.
- 2.3 The Memorandum refers to a second part, which supplements it and addresses the main strategic planning priorities identified in paragraph 156 of the NPPF which are addressed for South Cambridgeshire and its partners in this Statement of Cooperation. The document **Strategic Spatial Priorities: Addressing the Duty to Co-operate across Cambridgeshire & Peterborough** was published in January 2014. It was produced by the local authorities and reflects input from a range of stakeholders within the public and private sectors, including the Local Enterprise Partnership, the Environment Agency and Cambridgeshire and Peterborough Clinical Commissioning Group. It provides a basis for further collaboration across strategic priorities, in accordance with the on-going nature of the duty to co-operate.

### 3.0 Context

- 3.1 The 'duty to co-operate' is set out in Section 110 of the Localism Act. This applies to all local planning authorities, national park authorities and county councils in England, and to a number of other public bodies. The new duty:
- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
  - requires that councils set out planning policies to address such issues;
  - requires that councils and public bodies 'engage constructively, actively and on an on-going basis' to develop strategic policies; and
  - requires councils to consider joint approaches to plan making.

- 3.2 The National Planning Policy Framework (NPPF), which was published in March 2012, describes the duty to co-operate, sets out strategic issues where co-operation might be appropriate, and highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area.
- 3.3 Paragraph 156 of the NPPF identifies strategic priorities, such as housing and economic development requirements, the provision of transport, energy, water supply other major infrastructure, and climate change mitigation where it would be appropriate for cooperation to occur.
- 3.4 Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the public bodies, in addition to local planning authorities, with which the Council has a duty to co-operate in plan making. Those relevant to South Cambridgeshire are:
- Environment Agency
  - English Heritage
  - Natural England
  - the Civil Aviation Authority
  - the Homes and Communities Agency
  - each clinical commissioning group established under section 14D of the National Health Service Act 2006 <sup>(1)</sup>
  - the National Health Service Commissioning Board
  - Office of Rail Regulation
  - the Highway Authority

<sup>(1)</sup> The National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013 amends the Regulations to replace Primary Care Trusts with the replacement clinical commissioning group.

#### **4.0 The South Cambridgeshire Context**

- 4.1 South Cambridgeshire is located, as the name suggests, in the southern part of Cambridgeshire. The District entirely surrounds the city of Cambridge which is administered by Cambridge City Council. It is itself surrounded: in Cambridgeshire by Huntingdonshire and East Cambridgeshire; in Suffolk by St Edmundsbury; in Essex by Braintree and Uttlesford; in Hertfordshire by North Hertfordshire; and in Bedfordshire by Mid Bedfordshire District Council.
- 4.2 South Cambridgeshire is a two-tier area, with Cambridgeshire County Council also providing many public services including education, highways and social services. South Cambridgeshire is a predominantly

rural area currently comprising of 105 villages, the largest of which is Sawston, with a population of 148,800 persons in the 2011 census.

- 4.3 There is a close relationship with Cambridge, which is the sub-regional centre at the heart of the East of England. It is a major retail destination and provides higher order services and facilities to most of South Cambridgeshire's residents who predominantly live in villages. Villages towards the outer edge of the District also look to market towns in surrounding Districts but to a much lesser extent than to Cambridge (St Neots, Huntingdon, St Ives, Ely, Newmarket, Saffron Waldon, Royston and Biggleswade).
- 4.4 According to the 2011 census, nearly 80% South Cambridgeshire residents work in the District or in Cambridge. From the perspective of Cambridge, South Cambridgeshire provided 26.3% of its workforce.
- 4.5 The Cambridgeshire strategic housing market area which includes South Cambridgeshire covers a large area north and east of Cambridge comprising the Cambridgeshire Districts of Cambridge, South Cambridgeshire, Huntingdonshire, East Cambridgeshire and Fenland, and the Districts of Forest Heath and St Edmundsbury in Suffolk to the east. There is also overlap with the Peterborough housing market area.

## **5.0 Co-operation to date**

- 5.1 South Cambridgeshire has undertaken a wide range of engagement, discussion and joint working with local authorities and other public organisations to ensure that there has been a high level of cooperation in the preparation of the local plan which goes beyond the duty to co-operate in the Localism Act and the NPPF.
- 5.2 South Cambridgeshire District Council has a long history of joint working with other local planning authorities in Cambridgeshire. It has worked particularly closely with the City Council on a variety of planning matters over many years, reflecting the close functional relationship between the tightly drawn city boundary and its rural surroundings. The Cambridgeshire authorities have worked together on key strategic and joint issues at both officer and Member level through the preparation of Structure Plans, input to Regional Plans, and the review of the regional plan that reached draft plan stage before the Coalition Government announced that regional plans were to be abolished. Building on that work, a Joint Strategic Planning Unit was established for the Cambridgeshire and Peterborough local authorities in 2012 to ensure that a co-ordinated approach to strategic planning would continue.
- 5.3 The functional geography context of South Cambridgeshire shows that cooperation with Cambridge City Council is particularly important. Close working with the City Council has included the preparation of current development plans including joint Area Action Plans for major

developments. Whilst Cambridge City Council and South Cambridgeshire District Council are preparing separate Local Plans, this has not prevented a comprehensive approach being developed and sound arrangements have been put in place in order to ensure this. The Councils have worked jointly to ensure that cross boundary issues and relevant wider matters are addressed in a consistent and joined up manner.

- 5.4 Joint working arrangements have been established. At a Member level, previous joint working groups have been replaced by two new Member groups: The Cambridgeshire and Peterborough Joint Strategic Planning and Transport Member Group, which is a County wide group; and the Joint Strategic Transport and Spatial Planning Group, set up specifically to address issues affecting Cambridge and South Cambridgeshire comprising Members from South Cambridgeshire, Cambridge City and Cambridgeshire County Council. Work is also on-going at an officer level, steered by regular meetings of senior officers: a Chief Planning Officers group and regular meetings of Planning Policy Managers from all of the Cambridgeshire Districts (plus Peterborough) for County wide issues and senior officers from the three Councils for more Cambridge focussed issues.
- 5.5 The Cambridgeshire Councils commissioned the Joint Strategic Planning Unit to prepare a technical report that supports the **Strategic Housing Market Assessment (SHMA)** on development needs and a **Memorandum of Co-operation** and the spatial approach for Cambridgeshire and Peterborough, which demonstrates the coordinated approach to planning for the long term objectively assessed needs of the wider area. The Memorandum of Co-operation was agreed by the Councils in June 2013. The Joint Strategic Planning Unit also led on the preparation of a supplementary document to the memorandum, **Strategic Spatial Priorities: Addressing the Duty to Co-operate across Cambridgeshire & Peterborough**, which was published in January 2014.
- 5.6 A SHMA has been prepared and updated for the Cambridge sub region housing market area for a number of years. Following the publication of the NPPF in March 2012, the SHMA methodology has been adapted to provide the objectively assessed needs for housing and jobs for the period to 2031.
- 5.7 There has been **joint commissioning** primarily with Cambridge City Council of **evidence base documents** on a wide variety of topics, a review of the sustainable development strategy for Cambridge and South Cambridgeshire, a review of the inner boundary of the Cambridge Green Belt and on aspects of the sustainability appraisal including a **joint sustainability appraisal** of the development strategy covering Cambridge and South Cambridgeshire. There has also been close

working by the two councils with Cambridgeshire County Council, in particular on the transport modelling of the development options for the Local Plans and the County Council's preparation of a new transport strategy for Cambridge and South Cambridgeshire.

- 5.8 South Cambridgeshire and Cambridge City Councils worked together throughout the preparation of the Issues and Options consultations on the Cambridge Local Plan and South Cambridgeshire Local Plan, and also together with the County Council on the parallel consultation on issues for a new Transport Strategy for Cambridge and South Cambridgeshire. The Councils took the same approach to joint issues in the summer 2012 Issues and Options consultation. Each of the Issues and Options consultation documents took a common approach to the Green Belt on the edge of Cambridge, the future planning of Cambridge East and the Northern Fringe East and sub-regional sporting, cultural and community facilities. Each document also highlighted the corresponding consultation by the other Council. In terms of timetables, the Councils' Local Plan programmes have been very similar, although it did not prove possible to align them completely for the summer 2012 Issues and Options consultations.
- 5.9 A joint approach was also taken for the Issues and Options 2 consultation in January/February 2013, with a Part 1 consultation document being a joint consultation by the two Councils on the Development Strategy and Site Options on the Edge of Cambridge.
- 5.10 The consultation on each Council's Proposed Submission Local Plan and the draft Transport Strategy was carried out in parallel in the summer of 2013 (although South Cambridgeshire's consultation was extended by 2 weeks). All exhibitions were held jointly with the County Council for the Transport Strategy and some joint exhibitions were also held with Cambridge City Council during this time in locations near to the administrative boundary where there were joint issues.
- 5.11 South Cambridgeshire District Council has worked very closely with Cambridge City and Cambridgeshire County Councils and undertaken a wide range of engagement and discussion with other local authorities, notably the SHMA Districts. A similar approach was taken with the SHMA local authorities plus West Norfolk and Kings Lynn Borough Council to undertake a **Gypsy and Travellers Accommodation Needs Assessment (GTANA)** to identify the objectively assessed need for each District's gypsy and traveller population.
- 5.12 South Cambridgeshire District Council participates in regular Cambridgeshire Chief Planning Officer (attended by all Chief Planning Officers in Cambridgeshire, Peterborough and Districts surrounding Cambridgeshire plus senior officers from Cambridgeshire County Council) and Planning Policy Forum (attended by all Planning Policy Managers in Cambridgeshire and Peterborough and officers from Cambridgeshire County Council). These meetings of chief planners and

lead planning policy officers respectively were used to discuss strategic issues that affect more than one local authority, such as housing and employment needs, transport, waste, environment and biodiversity and provision for gypsies and travellers.

- 5.13 South Cambridgeshire District Council has also co-operated with Cambridge City Council in the preparation of Infrastructure Delivery Studies as part of the delivery the current Local Development Framework and identifying the infrastructure required for the delivery of the new Local Plans and testing viability. These studies have co-ordinated information gathered from infrastructure providers to ensure that information being given to each authority is consistent, and to advise on the development of Infrastructure Delivery Plans and implementation of Community Infrastructure Levy (CIL).

#### Co-operation in the preparation of the Local Plan

- 5.14 The Council has undertaken a significant amount of work in compiling an evidence base to support the plan review. This has involved the completion of a number of studies as well as working with key stakeholders, organisations and groups across the district. Details of the [evidence base and supporting studies](#) for the Local Plan can be found in the Proposed Submission Local Plan, and on the Council's website.
- 5.15 In December 2011, the Council consulted a range of key stakeholders including those that are now the 'duty to co-operate' public bodies making them aware that the Council was about to start preparing a Local Plan for South Cambridgeshire and asking for their views on issues to be included in the plan. These stakeholders included all the Specific Consultation Bodies and key organisations from the General Consultation Bodies. The Council highlighted that it would like to engage with and work collaboratively with these organisations throughout the plan making process. The stakeholders were asked to inform the Council of any existing or emerging projects in their organisations where including policies and proposals in the Local Plan would assist delivery.
- 5.16 All neighbouring local planning authorities have been consulted at each stage of plan preparation. The close cooperation with local planning authorities in Cambridgeshire is addressed elsewhere in the statement as is the evidence of the little strategic interaction that exists with Districts outside Cambridgeshire to the south and west. However, in the light of the introduction of the 'duty to co-operate' a letter dated 20 September 2012 was sent to St Edmundsbury, Braintree, Uttlesford, North Hertfordshire and Mid Bedfordshire District Councils drawing their attention to the 'duty to co-operate whilst the Council was consulting on Issues & Options for the new Local Plan. That letter included reference to the evidence that suggested that interaction was not at a strategic

level and more about access from peripheral South Cambridgeshire villages to service and facilities in neighbouring market towns (see Appendix A). These neighbouring local planning authorities were invited to advise the Council in their representations on the Issues and Options consultation of any matters on which they considered that close cooperation would be appropriate.

- 5.17 A [Sustainability Appraisal Scoping Report](#) was prepared, identifying existing issues and problems in the district, and the baseline situation for the sustainability appraisal of the plan. This was subject to consultation with key statutory bodies in February 2012, and was also open to consultation alongside the Issues and Options Report in July 2012.
- 5.18 This was followed up by a series of workshops, held between March and April 2012, with District Councillors, Parish Councils, stakeholders including the 'duty to co-operate' bodies (e.g. infrastructure providers), house builders, planning agents and registered providers. The purpose of these workshops was to explain how the Local Plan would be prepared, to encourage involvement from an early stage and to identify issues and concerns of those various interests ahead of preparing the Issues and Options consultation document. The workshops explored the issues facing the district and discussed the vision for the South Cambridgeshire and ideas and options to guide the development and use of land in the district over the next twenty years.
- 5.19 A further series of workshops with Parish Councils and local Councillors was held in July 2012 in the week leading-up to the start of consultation on Issues and Options. The purpose of these workshops was to explore how the Local Plan can help deliver Parish aspirations, potentially as an alternative to Neighbourhood Development Plans for those Parish Councils that preferred to use the Local Plan, and inform Parish Councils of the issues most relevant to them to assist them with making their responses to the Issues and Options consultation.
- 5.20 Workshops were also held with District Councillors in 2013 to consider the results of the Issues and Options consultations and held inform the preparation of the draft Local Plan. All workshop notes are included in the list of evidence base documents and within Appendix B of the Council's Statement of Consultation.
- 5.21 As key stakeholders, all relevant local authorities and public bodies including those covered by the 'duty to co-operate' were contacted and invited to submit representations during two rounds of Issues and Options consultation on matters to be included in the Local Plan. They also had the opportunity to take part in the consultation on the Proposed Submission Local Plan in the summer of 2013.

### Jointly Prepared/Commissioned Evidence studies

- 5.22 South Cambridgeshire District Council compiled the evidence to underpin the new Local Plan by studies prepared internally or in cooperation primarily with Cambridge City Council particularly where the issue was strategic and crossed the administrative boundary.
- 5.23 A review of the **Sustainable Development Strategy** for Cambridge and South Cambridgeshire was undertaken on behalf of the Councils by the Joint Strategic Planning Unit. The study which drew evidence from a Cambridgeshire Development Study 2009 commissioned as part of the now abandoned review of the East of England Plan concluded that the sustainable development sequence established in earlier regional plans and the Cambridgeshire Structure Plan 2003 (now embedded in the adopted Local South Cambridgeshire Local Development Framework 2007-2010) remains the most sustainable development strategy which should guide Cambridge City and South Cambridgeshire District Councils in their Local Plan preparation.
- 5.24 A **Strategic Housing Market Assessment** for the Cambridge Sub-Region housing market area was jointly commissioned with Cambridgeshire County Council and all of the Cambridgeshire District plus Peterborough, Forest Heath and St Edmundsbury to better understand the structure of the housing market operating across the housing market area and the housing demand, need and supply in order to identify the objectively assessed development needs for the Local Plan for the future. The SHMA which reported on development needs in May 2013 identifies the extent of the Housing Market Area using patterns of household and travel to work movements and the level of self-containment demonstrated in each. The SHMA includes jobs forecasts which in large measure underpin the population growth and housing needs identified in the SHMA report. The SHMA provides an evidence base for the development of housing policies within South Cambridgeshire Local Plan. This builds on **Population and jobs forecasts** commissioned by South Cambridgeshire and Cambridge City Council for the first round of Issues and Options consultation from Cambridge Econometrics and the East of England Forecasting Model (EEFM) forecasts prepared on behalf of the East of England local authorities.
- 5.25 The SHMA authorities plus West Norfolk and Kings Lynn Borough Council also prepared a **Gypsy and Travellers Accommodation Needs Assessment** to inform each District Councils' decision on an appropriate target for gypsy and traveller pitches. For South Cambridgeshire, this study was agreed on 13th June 2012 after an update by an internal review by the Council's housing team which is responsible for all housing accommodation needs in the District.

- 5.26 An **Employment Land Review (ELR)** was commissioned jointly by South Cambridgeshire District Council and Cambridge City Council. The ELR provides an audit of land already identified for employment, and assesses how much land will be required for employment during the plan period across the whole of the two District Council areas. The study also informs and provides evidence for the development of other policies relating to employment land in the Local Plans. A review of this ELR was carried out in 2012. There was also involvement with Cambridge City Council, Cambridgeshire County council and others in commissioning the **Cambridge Cluster at 50 Study** which looked at the prospect for the development of the Cambridge cluster of high technology companies.
- 5.27 There was joint commissioning with Cambridge City Council of the **Cambridge Sub Region Retail Study 2008** and its updating as part of a subsequent **North West Cambridge Retail Study 2010** to explore future retail needs in Cambridge and South Cambridgeshire.
- 5.28 South Cambridgeshire District Council, Cambridge City Council and Cambridgeshire County Council commissioned **Transport Modelling** to test alternative development options to inform decisions on the Local Plans and an overall Transport Strategy for Cambridge and South Cambridgeshire. The modelling produced forecasts of future highway demand and mode shares. It assessed the highways impacts of a range of development options for Cambridge and South Cambridgeshire in order to advise on whether housing growth could be accommodated within the existing highway network, and identify a range of packages of transport measures required in order to accommodate future travel demand. This work culminated in the modelling of the transport implications of the Local Plans for Cambridge and South Cambridgeshire
- 5.29 A **Strategic Flood Risk Assessment** (Level 1 and Level 2) was commissioned jointly between South Cambridgeshire District Council and Cambridge City Council. The SFRA Level 1 identifies the extent of the flood zones across both authorities in order to allow the application of the Sequential test, and advises on suitable policies to address flood risk management in a consistent manner across both administrative areas, in order to provide an evidence base to inform the Council's Local Plans. The SFRA Level 2 identifies the risk of flooding to inform the exception tests for development that cannot be located in a lower flood risk zone.
- 5.30 A review of the **Inner Green Belt Boundary** was undertaken in the autumn of 2012 with Cambridge City Council to explore what further options there were for revising the recently reviewed boundary (completed in 2010 by the adoption of the South Cambridgeshire Site Specific Policies DPD).
- 5.31 A Review of the Evidence and Site Options for the **Cambridge Sub-Region Facilities Review** was published in January 2013 to

update studies carried out by Cambridgeshire Horizons between 2005 and 2007.

5.32 Cambridgeshire Horizons, the former delivery body for Cambridgeshire commissioned a number of studies on behalf of the Cambridgeshire local authorities which have informed the new Local Plan including:

**1. Major Sports Facilities Strategy for the Cambridge Sub Region 2005**

The study set out to identify major sports facilities that could be provided to support development in the Cambridge Sub-Region arising out of the Cambridgeshire Structure Plan 2003.

**2. Arts and Culture Strategy for the Cambridge Sub-Region 2006**

An Arts and Culture Strategy was produced to identify what Cambridgeshire could aspire to in terms of arts and cultural facilities. The strategy outlines the possible funding mechanisms to support the provision of arts and cultural facilities in new communities and considers the economic benefits to the region in providing high quality arts and culture facilities.

**3. Cambridge Community Stadium Feasibility Study 2007**

The study explored opportunities for accommodating a Community Stadium (one of the facilities proposed in the 2005 study). A Community Stadium is a sports facility that provides a range of amenities and services beyond its core use tailored to reflect local need which is accessible to the communities it serves.

**4. Balanced and Mixed Communities: A Good Practice Guide 2008**

The report sets out guidelines for planning for a mix of housing types (e.g. family homes, flats) and tenures (e.g. owner-occupied, affordable social housing, social and market rental housing) that will allow for individuals, families and communities to mature, grow and change

**5. Cambridge Northern Fringe East Viability Study 2008**

Having been the subject of a number of proposals for redevelopment which had never come to fruition, the purpose of the study was to review previous reports, identify the key issues, define potential development options which might be implementable and assess likely project feasibility. The study concluded that modest redevelopment proposals for employment use around a new mainline railway station was

the only development which would be viable for the foreseeable future.

**6. Water Cycle Strategy 2008 & 2011**

The overall objective of the Water Cycle Strategy is to provide a sustainable approach to the provision of water services infrastructure including flood risk management, water supply, drainage and the opportunities for SUDS, waste water infrastructure, the ecological impact of growth and the delivery of sustainable water infrastructure to help reduce water consumption

**7. Cambridgeshire Green Infrastructure Strategy 2011**

The project led to the development of a Strategy is designed to assist in shaping and co-ordinating the delivery of Green Infrastructure in the county, to provide social, environmental and economic benefits now and in the future. The intention is that the strategy will be implemented through Local Plans. Green Infrastructure is part of our natural life-support system. It is the network of natural and man-made features such as open spaces, woodlands, meadows, footpaths, waterways and historic parks, which help to define and to link the communities, villages, towns and cities of Cambridgeshire with each other and to the surrounding landscape.

**8. Cambridgeshire Renewables Infrastructure Framework 2012**

The Cambridgeshire Renewables Infrastructure Framework (CRIF) examined the potential opportunities to generate renewable energy in Cambridgeshire. It was intended to inform the development of planning policies to help meeting national targets for zero carbon homes and reduced greenhouse gas emissions.

**9. Cambridgeshire Community Energy Fund 2012**

The study explored the options for carbon off-setting to be captured and invested locally in renewable energy generation projects.

Infrastructure

- 5.33 Together with Cambridge City Council, South Cambridgeshire commissioned consultants to prepare an Infrastructure Delivery Study (IDS) to advise on the infrastructure which would be needed to implement the proposals in the South Cambridgeshire Local Development Framework 2007-2010 and the Cambridge Local Plan 2006. The IDS was also intended to inform the setting of a Community Infrastructure Levy (CIL) by the two District Councils. The two Councils used consultants to update the IDS for the delivery of the new Local Plans and to look at their overall viability in delivering sustainable development. This review was published in 2013.

- 5.34 Cambridgeshire County Council is a particularly significant partner, and wide ranging co-operation has taken place regarding issues such as school provision, library services, adult social care facilities, public transport provision, cycling and highways improvements. Discussions have been undertaken with all service providing departments and in particular with the education department to ensure proper school provision in all of the new developments, including cross boundary development sites.
- 5.35 Discussion has also taken place with the Highways Agency concerning the developments on the edge of Cambridge and at the new towns, particularly for the delivery of Northstowe which remains part of the development plan.
- 5.36 There has been co-operation with the Cambridgeshire Primary Care Trust (PCT) and its successor the NHS Cambridgeshire and Peterborough Clinical Commissioning Group regarding GP surgeries, dentists and hospital services, the Environment Agency regarding flood storage compensation, and Natural England regarding the green corridors and the creation of a green network. Discussion and information was also shared with Cambridgeshire Police, Cambridgeshire Fire and Rescue, and the Ambulance Service.
- 5.37 Discussions have also been held with non-public sector service providers including Cambridge Water who advise that water conservations should be pursued through the Local Plan and Anglia Water which is responsible for waste water treatment who advise that there are no insurmountable problems with its infrastructure.

## **6.0 Summary**

- 6.1 South Cambridgeshire District Council has had a high level of co-operation with other authorities and public bodies, particularly Cambridge City Council and Cambridgeshire County Council, and has participated in a number of joint projects. This approach has resulted in a robust and solid evidence base for the South Cambridgeshire Local Plan.
- 6.2 The cooperation that the Council has undertaken in preparing the Proposed Submission Local Plan includes and goes substantially beyond the cooperation required for strategic planning. The Issues and Options consultations which underpin the Proposed Submission Local Plan did not generated any objections from neighbouring local authorities or any of the bodies covered by the 'duty to co-operate' set out in Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012 and comprising the Environment Agency, English Heritage, Natural England, the Civil Aviation Authority, the Homes and

Communities Agency, Primary Care Trusts and their successor the NHS Cambridgeshire and Peterborough Clinical Commissioning Group, the Office of the Rail Regulator, the Highways Agency or other Highway Authorities.

- 6.3 During the Proposed Submission Local Plan consultation there have been some challenges made to the duty to co-operate approach:
- Hertfordshire County Council has concerns about the wider transport implications of development proposals within the local plan
  - Central Bedfordshire Council although with no specific objection mentions the potential unmet housing need within its district being met by South Cambridgeshire Council.
  - Cambridge South promoters say that cooperation has not been effective and strategy will not result in sustainable development.
  - Bourn Parish Council and Histon and Impington Village Action Group concerned that cooperation wasn't sufficient.
- 6.4 South Cambridgeshire Council has worked with its neighbours throughout the plan making process. All of the Council's 'duty to co-operate partners' including Central Bedfordshire Council, Hertfordshire County Council and all parish councils within and adjoining the district were formally contacted at the outset of the plan making process and given the opportunity to discuss any issues with the Council. These partners were also informed of each stage of the public consultations and invited to workshops. Until the Proposed Submission stage of consultation South Cambridgeshire Council had not received any concerns from any of these 'duty to co-operate' partners about the fulfilling of this requirement.
- 6.5 Hertfordshire County Council (HCC) in its representation expressed concerns about the wider transport issues in the south of the District. Cambridgeshire County Council is preparing a Transport Strategy for Cambridge City and South Cambridgeshire that is being developed alongside the proposals in both Councils' Local Plans. The concerns of HCC are more a matter of cooperation between two County Councils as transport authorities and South Cambridgeshire Council considers that this would best be addressed to the County Council in their strategy rather than as a representation on the South Cambridgeshire Local Plan. The Council understands that there is already an on-going dialogue between these councils about the A10 corridor.
- 6.6 Central Bedfordshire Council has in its representation indicated that it is not making a specific objection to the emerging plan but is bringing to South Cambridgeshire Council's attention the potential unmet housing need in the area and the possible role of South Cambs in accommodating some of that need. It also mentions that in future assessments of the needs of Gypsy and Travellers that this need may not be fully accommodated within their district and that they would wish to work collaboratively with their neighbours. South Cambridgeshire

Council considers that this representation does not include sufficient detail and is too late in the plan-making process to have an impact on the contents of the plan. It specifically states it is not an objection and therefore cannot be considered as a failure in South Cambridgeshire Council's duty to co-operate with this adjoining authority.

6.7 The Council does not consider that the points made by Central Bedfordshire Council and Hertfordshire County Council can reasonably be substantiated as a failure to comply with the duty to co-operate and correspondence is ongoing with those councils to seek agreement that they are not pursued as objections under the duty.

6.8 Table 1 summarises how South Cambridgeshire Council has co-operated with other authorities and public bodies in the preparation of the Proposed Submission Local Plan.

**Table 1. Local Plan – Summary of Co-operation with Section 110 bodies**

<b>Organisation</b>	<b>Nature of Co-operation</b>
Cambridge City Council	<ul style="list-style-type: none"> <li>• Co-ordinated timetabling and public consultation.</li> <li>• Joint sustainability appraisal of the 2 District Councils development strategies.</li> <li>• Memorandum of Cooperation.</li> <li>• Cambridge &amp; South Cambridgeshire Joint Transport and Spatial Planning Group of members to discuss key strategic issues.</li> <li>• Continuous informal discussion and statutory consultations.</li> <li>• Discussions at Chief Officers Meetings.</li> <li>• Discussions at Planning Policy Forum.</li> <li>• Fortnightly City/South Cambridgeshire/Cambridgeshire County Council meetings.</li> <li>• Engagement at County Infrastructure Delivery and Group and CIL working group.</li> <li>• Identifying objectively assessed development needs.</li> <li>• Identifying the need for gypsy and travellers accommodation.</li> <li>• Joint commissioning of evidence base studies.</li> <li>• Joint officer working on evidence base studies.</li> </ul>

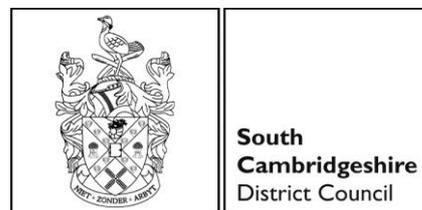
Organisation	Nature of Co-operation
	<ul style="list-style-type: none"> <li>• Joint commissioning of the Infrastructure Delivery Study.</li> </ul>
Other neighbouring Councils	<ul style="list-style-type: none"> <li>• Memorandum of Cooperation for the Cambridgeshire authorities.</li> <li>• Continuous informal discussion and statutory consultations.</li> <li>• Discussions at Chief Officers Meetings.</li> <li>• Discussions at Planning Policy Forum for Districts in Cambridgeshire.</li> <li>• Specific request to Councils outside Cambridgeshire to have in mind strategic issues in their responses to consultations</li> <li>• Identifying objectively assessed development needs in Cambridgeshire and Suffolk.</li> <li>• Identifying the need for gypsy and travellers accommodation in Cambridgeshire and Suffolk.</li> <li>• Joint commissioning of evidence base studies.</li> <li>• Joint officer working on evidence base studies.</li> </ul>
Cambridgeshire County Council	<ul style="list-style-type: none"> <li>• Memorandum of Cooperation.</li> <li>• Cambridge &amp; South Cambridgeshire Joint Transport and Spatial Planning Group of members to discuss key strategic issues.</li> <li>• Continuous informal discussion and statutory consultations.</li> <li>• Discussions at Chief Officers Meetings.</li> <li>• Engagement at Planning Policy Forum.</li> <li>• Continuous informal discussion and statutory consultations.</li> <li>• Participation in the Infrastructure Delivery Study.</li> <li>• Transport modelling and development of the transport strategy.</li> <li>• Discussions concerning infrastructure provision for development sites.</li> </ul>
Environment Agency	<ul style="list-style-type: none"> <li>• Early stakeholder engagement.</li> <li>• Statutory consultation.</li> <li>• Involvement in the Strategic Flood Risk Assessment.</li> <li>• Involvement in the Water Cycle Strategy.</li> <li>• Meetings to discuss individual</li> </ul>

Organisation	Nature of Co-operation
	development sites.
Highways Agency	<ul style="list-style-type: none"> <li>• Early stakeholder engagement.</li> <li>• Statutory consultation.</li> <li>• Meetings to discuss individual development sites.</li> <li>• Meeting on development proposals affected by the proposed A14 upgrade.</li> </ul>
Primary Care Trusts and their successors which includes the NHS Cambridgeshire and Peterborough Clinical Commissioning Group and local commissioning groups	<ul style="list-style-type: none"> <li>• Early stakeholder engagement.</li> <li>• Statutory consultation.</li> <li>• Meetings to discuss individual development sites.</li> </ul>
English Heritage	<ul style="list-style-type: none"> <li>• Early stakeholder engagement.</li> <li>• Statutory consultation.</li> <li>• Meetings to discuss individual development sites.</li> </ul>
Natural England	<ul style="list-style-type: none"> <li>• Early stakeholder engagement.</li> <li>• Involvement in the preparation of the Green Infrastructure Strategy.</li> <li>• Statutory consultation.</li> </ul>
The Civil Aviation Authority	<ul style="list-style-type: none"> <li>• Statutory consultation.</li> </ul>
The Homes & Communities Agency	<ul style="list-style-type: none"> <li>• Early stakeholder engagement.</li> <li>• Statutory consultation.</li> <li>• On-going discussions over Northstowe.</li> </ul>
Office of the Rail Regulator	<ul style="list-style-type: none"> <li>• Statutory consultation.</li> </ul>

## Appendix A: Letter Sent to adjoining district councils

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Cambourne  
Cambridge  
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Planning and New Communities  
Contact: Keith Miles  
Direct dial: 01954 713181  
Direct email: [keith.miles@scambs.gov.uk](mailto:keith.miles@scambs.gov.uk)

20<sup>th</sup> September 2012

Dear Sir / Madam

I am writing to you with regard to South Cambridgeshire District Council's duty to cooperate with adjoining Councils and other key bodies on the preparation of the new South Cambridgeshire Local Plan. As you know, the Council is currently consulting on issues and options for a new Local Plan for the district, to cover the period up to 2031. The closing date for representations is 28<sup>th</sup> September.

In preparing for Issues and Options, South Cambridgeshire has prepared and collated a significant evidence base. Much of this has been prepared with partners, in particular Cambridge City Council, other Cambridgeshire Local Authorities and, through the Strategic Housing Market Assessment, local authorities in west Suffolk.

Evidence suggests most of the strategic interactions impacting on more than one authority apply to these areas, rather than to the south or the west, where the main interactions are about access to services and jobs in the market towns, or transport links through the district to Cambridge and major employment areas. However, there may be other issues, including resulting from your emerging development plans, that require further consideration.

You may already be addressing this question in preparing your response to the current consultation on the South Cambridgeshire Issues and Options Report. However, in addition to the consultation, I am also seeking your views as to whether there are any other cross boundary issues that you consider need to be addressed, or considered further prior to preparing the draft plan. Depending on the issues raised either through your responses to the consultation or to this letter, we intend to follow up either with a workshop with adjoining Councils, or one to one meetings, to discuss cross boundary issues and ensure that any relevant issues outside the district that affect the planning of South Cambridgeshire are properly considered at this early stage of plan making.

The Council will be happy to engage with you in a similar manner as you prepare your own development plans. I am grateful for your assistance with this matter.

Yours faithfully

A handwritten signature in black ink that reads "K. Miles".

Keith Miles  
**Planning Policy Manager**