Date: 13th December 2021



Dear Cambridge City and South Cambridge District Councils,

Greater Cambridgeshire Local Plan Regulation 18 Consultation, First Proposals

Thank you for consulting Suffolk County Council (SCC) on the First Proposals Local Plan.

As a neighbouring authority SCC's response will focus subjects and issues relevant across administrative boundaries. To date SCC have been included in discussions relating to the plan as part of the duty-to-cooperate. This is welcome and SCC will continue to participate in discussions with Greater Cambridgeshire as required alongside other Suffolk authorities.

Spatial Options and Chosen Distribution

It is clear that a wide range of spatial options have been tested. The chosen option is to aid in achieving both South Cambridgeshire District and Cambridge City Councils net zero carbon ambitions, particularly relating to transport, by locating homes, employment and services near to one another. Suffolk local authorities have similar net zero ambitions and support this approach. The chosen distribution, focusing additional areas of development largely in close proximity to Cambridge City, is also the least likely to impact on infrastructure within Suffolk.

Transport Links

Enabling transport across administrative boundaries should be an aim of local plans and a significant number of trips to into Cambridgeshire originate in Suffolk. It is noted that figure11 in the plan identifies some of the key transport links within the plan area and beyond. The inclusion of future improved rail links from Ipswich, via Bury St Edmunds and Newmarket is welcome. In the emerging strategy from Transport East¹ the corridor between Ipswich and Cambridge, which of course consists the railway line and A14, is identified as strategically important regionally and nationally. It is also recommended that the dualling of the rail link to Newmarket is included in the infrastructure delivery plan.

Reference to improved bus services between Haverhill and Cambridge in the Infrastructure Delivery Plan is welcome. SCC are currently developing a bus improvement strategy as part of Bus Back Better and aspire to improve bus between Newmarket, Bury St Edmunds and Cambridge, as well as connecting villages outside of Suffolk, but where residents use services in Suffolk towns, such as Newmarket or Haverhill. SCC will need to work with operators and the Cambridgeshire and Peterborough Combined Authority to achieve this. However, the local plan can assist by ensuring that transport policies explicitly support the provision of public transport measures which cross administrative boundaries.

Planning Obligations and Mitigating Impacts

¹ https://www.transporteast.org.uk/public-consultation/

As mentioned previously, it is not expected that the chosen distribution will create significant impacts on infrastructure in Suffolk. Regardless, policies in the plan relating to use of planning obligations to mitigate impacts of development should ensure that planning obligations can be used to mitigate impacts in neighbouring authorities, where the evidence identifies this is taking place. Related to this, policies which require site assessments should express that assessments of impacts (e.g. transport assessments) should also account for the impacts across boundaries where this is relevant.

For example, rural communities in Suffolk around Haverhill, particularly along the A1307, are reporting increased volumes and speed of traffic and reporting rat running. Some of which was associated with the development of housing in South Cambridgeshire, which illustrates the need for the plan to address cross boundary impacts.

In relation to the specific issue of A1207 communities, SCC officers recently met with a Villages Working Group, formed to address these issues, and understand the group and the Greater Cambridgeshire Partnership have corresponded with one another. SCC would encourage the Greater Cambridgeshire Partnership to continue engaging with this group, SCC and other relevant community groups where cross boundary impacts result from growth in Cambridge and South Cambridgeshire.

Green Infrastructure

Green infrastructure appears to be extensively mapped in the plan and broad areas for projects identified. Green infrastructure is also a relevant cross boundary matter as ecosystems do not stop at administrative boundaries. Development management policies of the plan should enable the development of green infrastructure across boundaries where relevant.

It is also recommended that the plan takes a positive stance towards contributing to the aims of statutory Nature Recovery Strategies established by the Environment Act 2021. While we are still awaiting secondary legislation to specify the details of the contents of these strategies, planning policies could still take a positive stance towards them pre-emptively.

Other Comments

SCC is currently in the process of reviewing its Lorry Route Plan². This includes the A14 as a Strategic Route, but also includes routes through and around Haverhill and into South Cambridgeshire.

The SCC Green Access Strategy (Rights of Way Improvement Plan) sets out the Council's approach to improving the rights of way network within Suffolk. We would welcome joint working to improve cross boundary rights of way connections.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have and you may contact us using the information at the top of this letter.

Yours sincerely,

Cameron Clow Senior Planning and Growth Officer Growth, Highways, and Infrastructure

² https://www.suffolk.gov.uk/roads-and-transport/lorry-management/lorry-route-plan-review-in-suffolk/draft-lorry-route-network-map/