

Your Ref: Issues and Options Consultation
Our Ref: Greater Camb Reg 18 Consultation



Date: 30th January 2026

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Sent via email to:
localplan@greatercambridgeplanning.org

Dear Greater Cambridge Local Plan team,

Greater Cambridge Local Plan – Regulation 18 Consultation

Thank you for consulting Suffolk County Council (SCC) on the Draft Greater Cambridge Local Plan

As you will be aware the new plan-making system provided by the Levelling Up and Regeneration Act 2023, and the November 2025 Commence and Update Local Plan (CULP) guidance, does not include the Duty to Co-operate. It has been advised¹ that Local Planning Authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Inspectors should continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'.

This response therefore comprises officer comments, made in the context of maintaining effective co-operation, regarding strategic matters that cross our administrative boundaries. SCC understands from the settlement strategy and allocations that there is a low level of windfall and allocated growth in the area of South Cambridgeshire that directly affects our border. Our comments relate to highways and transport; minerals and waste planning, and education issues. These comments are set out under the relevant topic headings below. Our officers would be happy to further engage with you as your plan progresses.

Local Economy

The influence of Cambridge on western Suffolk is acknowledged in the Suffolk Local Growth Plan² and by the fact that it is part of the Cambridge-Norwich Tech Corridor, and the Cambridge Housing Market Area. The county council would welcome strong recognition of the role of South Cambridgeshire in the wider sub-regional economy as part of this strategy, as alluded to in paragraph 1.17. There are strong business links between the Suffolk and Cambridgeshire economies. A good example is several large pharmaceutical companies, benefiting from their proximity to Cambridge's life science cluster including the international pharmaceutical company Sanofi has a research facility in Cambridge and a manufacturing facility in Haverhill.

¹ <https://www.gov.uk/government/publications/local-plan-examinations-letter-to-the-chief-executive-of-the-planning-inspectorate-november-2025>

² <https://suffolkeconomy.co.uk/wp-content/uploads/2025/01/SCC-Economy-Strategy-24.pdf>

This is perhaps exemplified through the case of Haverhill, which is growing and has strong commercial ties to Cambridge, requiring fast and safe links to the city along the A1307. The East of England is polycentric with rural areas looking to small and medium sized towns and cities for employment and services. The county council would support efforts from and with local authority partners, in both Suffolk and Cambridgeshire, to develop economic strategies that realise the benefits of these economic interrelationships, whilst recognising and mitigating the negative impacts. As well as Suffolk residents travelling to destinations in Greater Cambridge, there will also be movements to places like Haverhill including Haverhill Business Park and Haverhill Research Park.

Education

A small number of pupils, living in Greater Cambridge, attend schools in Suffolk (and, indeed, vice versa). Any development proposal near the border with Suffolk should include consideration as to whether or not any resulting demand for school places will result in demand being placed upon Suffolk schools. In rare circumstances, developer contributions may be required. Please see the Section 106 Developer's Guide to Infrastructure Contributions³ in Suffolk for further information on the county council's approach to seeking education and other infrastructure contributions.

Housing Mix

Policy H/SS sets a positive requirement that all new build residential units will be designed to meet the Building Regulations M4(2) accessible and adaptable standards. This approach is strongly supported from a public health perspective, as accessible and adaptable housing plays a key role in supporting healthy ageing, enabling independent living, and reducing the risk of falls, injury, and avoidable hospital admissions.

However, concern is noted in relation to paragraph 9 of Policy H/SS, which allows exceptions to the M4(2) and M4(3) standards where viability or site-specific constraints are demonstrated. Whilst it is recognised that some flexibility may be necessary in limited circumstances, there is a risk that this provision could be used more routinely, potentially undermining delivery of accessible housing at scale. It is therefore recommended that the policy be strengthened to clarify that exceptions are expected to be robustly justified, and subject to transparent scrutiny, with M4(2) requirements embedded into viability assessments from the earliest stages of scheme design. Consideration could also be given to requiring partial compliance where full compliance is evidenced to be unviable, ensuring that long term public health outcomes remain central to decision making.

Health and Wellbeing

Active Travel

It is welcome that Policy WS/HD 1.e and Policy GP/PP 1.b.ii. contain important principles for active travel. The link between enabling active travel and improved physical and mental health, reduced health inequalities, and the prevention of chronic disease should be emphasised, as this provides a stronger rationale for prioritising active travel in all new developments. It is suggested that the following additional wording could be included in the supporting information to Policy I/ST:

Active travel such as walking, wheeling, and cycling, plays an important role in supporting the health and wellbeing of communities. Regular physical activity can reduce the risk of

³ <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/section-106-planning-obligations/developers-guide-to-infrastructure-contributions-in-suffolk>

chronic diseases including heart disease, stroke, diabetes⁴ and some cancers⁵, whilst also supporting healthy weight management and mental health. Prioritising active travel in neighbourhood design can also help to reduce health inequalities by making healthy choices easier and more accessible for all, including those who may not have access to a car.

Health Ageing

The Local Plan acknowledges the significant demographic shift anticipated in Greater Cambridge, projecting a 26% increase in residents aged 65+ by 2031, with the most rise among those aged over 80 years old, raising concerns about dementia prevalence. Whilst policies such as GP/PP, criterion 1.a.ii, and GP/QP, criterion 1.e, address accessibility and inclusivity for older people and those with reduced mobility, they lack dementia friendly design principles. It is suggested that Policy GP/QP could be strengthened by including features like clear wayfinding and appropriate street furniture to improve cognitive accessibility.

Neurodiversity and Sensory Inclusive Design

While the Local Plan places appropriate emphasis on healthy ageing, accessibility, and inclusive design, there is no specific reference to neurodiversity or sensory inclusive design principles. Neurodivergent people, including those with autism, ADHD, learning disabilities, and sensory processing differences, may experience barriers in the built environment such as noise, visual clutter, poor legibility or unpredictability. Therefore, it is recommended to include incorporating sensory-inclusive principles into policies and design principles, such as clear layouts, controlled lighting, reduced overstimulation, and quiet spaces. These measures would create healthier, more inclusive environments for neurodivergent people, older adults, and others with cognitive or sensory impairments.

Minerals and Waste

The need for aggregates, required for building the proposed new developments, could have an impact on available supplies, and their transportation, for development in Suffolk. Such matters may need to be given further consideration as the plan progresses and as more detailed information becomes available.

Waste – Recycling Centres

Much like education, a small number of residents, living in Greater Cambridge, will use Suffolk County Council's infrastructure including Haverhill's Recycling Centre which opened in August 2024. Any development proposal near the border with Suffolk will need to include consideration as to whether or not any resulting demand will result in demand being placed upon Suffolk's infrastructure. In some circumstances, developer contributions may be required. Please see the Section 106 Developer's Guide to Infrastructure Contributions in Suffolk for further information on the county council's approach to seeking waste and other infrastructure contributions.

Natural Environment

Policy BG/BG: Biodiversity and geodiversity

SCC encourages that the Mitigation Hierarchy is applied in full by improving the wording of part 7 to include compensation.

⁴ <https://www.nice.org.uk/guidance/ph41/documents/no-time-for-physical-activity-the-answers-on-your-doorstep-says-nice>

⁵ https://assets.publishing.service.gov.uk/media/5bf41840e5274a2af47c464e/Cycling_and_walking_for_individual_and_population_health_benefits.pdf

Policy BG/GI: Green and blue infrastructure

While it is noted that the Local Nature Recovery Strategy⁶ is referenced in in Policy BG/RC: River corridors, it is suggested to also reference it within Policy BG/GI policy as well.

Public Rights of Way (PRoW)

It is noted that for larger developments near the Suffolk border, SCC would look for improved green infrastructure, including PRoW, walking, wheeling and cycling and other green access improvements to services over the border. This would be especially true around Haverhill, for example if Horseheath were to expand.

Transport

The A1307 is a part of the strategic road network and an important corridor which should be referenced on all maps.

Suffolk County Council is committed to working collaboratively with Greater Cambridge Shared Planning (both South Cambridgeshire District Council and Cambridge City Council), as well as West Suffolk Council and Cambridgeshire County Council to improve safety and reduce the impacts of congestion on the A1307.

Safety and congestion levels on the A1307 between Haverhill and Cambridge are a concern to Suffolk County Council, and we urge Greater Cambridge to take every reasonable step to mitigate the transport impacts of new growth and solve existing problems on this key route, with a focus on sustainable transport. The Local Transport Plan 2025-2040 (LTP4) includes long term sustainable transport solutions to mitigate the difficulties of accessing the strategic road network along the A1307. It is noted the local plan includes reference to a proposed transport corridor in the direction of Haverhill

General

Page numbers referenced in the main contents list and sub contents lists included at the start of each chapter are not consistent. For example, on page 8 indicates that Policy I/ST: Sustainable transport and connectivity will be on page 663 however the sub contents list on page 668 correctly indicates that this policy is on page 671. All contents lists should be reviewed for consistency.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

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⁶ <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>