

Greater Cambridge Local Plan

Draft Plan Duty to Cooperate Compliance Statement



October 2025

Published as part of the draft Local Plan - Regulation 18 consultation
(December 2025 – January 2026)

Contents

Draft Plan Duty to Cooperate Compliance Statement	1
1. Introduction	3
2. Requirements.....	6
3. Overview of Duty to Cooperate engagement	9
4. Strategic cross-boundary matters	11
5. Conclusion	30
6. Appendices	32

1. Introduction

Purpose

- 1.1 This Greater Cambridge Local Plan Duty to Cooperate Statement of Compliance provides an audit trail demonstrating how Cambridge City Council and South Cambridgeshire District Council (the Councils) have addressed the duty to cooperate (required by [section 33A of the Planning and Compulsory Purchase Act 2004](#)). The duty requires plan-making authorities to ‘engage constructively, actively and on an ongoing basis with relevant bodies in the preparation of development plan documents – in this case the Greater Cambridge Local Plan. The Statement of Compliance sets out which bodies the Councils have co-operated with and on which strategic matters, the nature and timing of the co-operation, and the outcomes of the co-operation to date, including how strategic approaches and policies in the Draft Greater Cambridge Local Plan have been influenced by effective co-operation and joint working.
- 1.2 This Statement of Compliance accompanies the Draft Plan consultation for the Greater Cambridge Local Plan and records activities undertaken since the First Proposals consultation. Previous activities are documented in previous versions of the Statement of Compliance prepared for earlier stages of the plan making process, and updated statements will be prepared at each plan making stage.

Relationship with other documents

- 1.3 This Statement has a close relationship with a number of other documents as follows:

Greater Cambridge Draft Local Plan Statement of Common Ground

- 1.4 The purpose of the Greater Cambridge Local Plan Duty to Cooperate Statement of Common Ground is to set out the main areas of common and uncommon ground with relevant partners on strategic cross-boundary matters. It also forms part of the evidence required to demonstrate that the Councils have complied with the duty to cooperate in preparing the local plan.
- 1.5 A Statement of Common Ground is intended to be a concise sign-posting document setting out the outcomes at a point in time of the ongoing cooperation with relevant bodies regarding strategic cross-boundary matters set out in the Statement of Compliance. In so doing, the Statement of Common Ground addresses [National Planning Policy paragraph 36](#), which states that Plans are sound if they are ‘Effective...based on effective joint working on cross-boundary

strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground’.

- 1.6 The Planning Practice Guidance sets out the required approach to preparing one or more Statements of Common Ground (SoCG) with relevant bodies. In accordance with the guidance, the Greater Cambridge Local Plan interim Statement of Common Ground has been published alongside this Statement of Compliance. Updates to the Statement of Common Ground will be published at each stage of the plan making process.

Greater Cambridge Local Plan Statement of Consultation

- 1.7 The Statement of Consultation sets out how the Councils have undertaken consultation and propose to undertake consultation in preparing the Greater Cambridge Local Plan.
- 1.8 The Statement will be updated at each stage of the plan making process; the current version supports the draft plan stage (Regulation 18).
The approach to Local Plan consultation is founded on the Councils’ [Statement of Community Involvement](#). This sets out how and when we will involve the community and key stakeholders in preparing, altering and reviewing our plans and guidance for future development. It also explains how we will involve the community in planning applications.
- 1.9 The current version of the [Statement of Consultation](#) provides details of the consultation and engagement we have undertaken to date. This includes events before and after the first formal consultation on the plan, as well as details of the previous formal consultations known as The First Conversation and The First Proposals. The Statement summarises comments received to date and how we have taken this into account in developing the draft Local Plan.

Greater Cambridge Authority Monitoring Report

- 1.10 Planning Practice Guidance outlines that LPAs must publish information at least annually that reports any activity relating to the duty to cooperate. The [Greater Cambridge Authority Monitoring Report](#) provides an additional ongoing record of duty to cooperate activity across the two councils.

2. The Local Context

2.1 Cambridge City Council and South Cambridgeshire District Council are working together to create a joint Local Plan, covering the area known as Greater Cambridge. Greater Cambridge directly adjoins various local authority areas shown in the map in **Figure 1**. Cambridge, located around 60 miles north-east of London, has an area of approximately 4,070 hectares. Cambridge is encircled by South Cambridgeshire which covers an area of approximately 90,163 hectares.

2.2 Greater Cambridge is a two-tier area, with Cambridgeshire County Council providing many public services including education, highways and adult care. In addition, the Cambridgeshire and Peterborough mayoral Combined Authority has responsibilities for local transport policy among other roles (see more detail at 2.2).



Figure 1: Strategic context – adjacent local authorities

3. Requirements

Duty to Cooperate requirements

- 3.1 The duty to co-operate in relation to planning for sustainable development 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, county councils and other prescribed bodies to co-operate with each other to address strategic cross-boundary matters relevant to their areas (noting that cross-boundary matters include those between Cambridge and South Cambridgeshire as well as those affecting areas beyond the outer boundary of South Cambridgeshire). The duty requires on-going constructive and active engagement in the preparation of local plans and other activities relating to sustainable development and use of land. At examination, the statutory duty to cooperate is considered by the inspector as a standalone test separate to consideration of the soundness of the plan.
- 3.2 Paragraphs 24-28 of the National Planning Policy Framework (National Planning Policy Framework), and supporting [Planning Practice Guidance](#), set out requirements relating to maintaining effective cooperation. Plan-making activities addressing these points will help demonstrate that the statutory duty to cooperate has been fulfilled, but they are primarily national policy requirements, tested by the inspector in relation to the soundness of a plan. Requirements include:
- the need for strategic policy-making authorities to identify the relevant strategic matters which need to be addressed in plans;
 - the need for strategic policy-making authorities to collaborate with other strategic policy-making authorities, and to engage with other relevant bodies;
 - effective and on-going joint working to produce a positively prepared and justified strategy;
 - joint working should help to determine whether additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere;
 - that plans ensure a consistent approach is taken to planning the delivery of major infrastructure, unmet development needs from neighbouring areas are provided for in, and any allocation or designation which has significant implications for neighbouring areas is appropriately managed; and
 - the need to prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these (these should be made publicly available throughout the plan-making process to provide transparency).

3.3 The National Planning Policy Framework lists the following as relevant bodies: Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers). Engagement between local planning authorities and neighbourhood planning bodies is not covered by the duty to cooperate.

Duty to Cooperate bodies

The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 specify which bodies the duty to cooperate applies to.

In the context of Greater Cambridge, the councils are considered to have a duty to cooperate with neighbouring local authorities and county councils as well as the prescribed bodies listed below:

Neighbouring Local Planning Authorities and County Councils:

- Huntingdonshire District Council
- East Cambridgeshire District Council
- West Suffolk Council
- Braintree District Council
- Uttlesford District Council
- North Hertfordshire District Council
- Central Bedfordshire Council
- Cambridgeshire County Council
- Hertfordshire County Council
- Essex County Council
- Suffolk County Council

Prescribed duty to cooperate bodies:

- Cambridgeshire & Peterborough Combined Authority (Local Transport Authority; responsibility to prepare a Non-Statutory Strategic Spatial Framework and will in future prepare a Spatial Development Strategy; responsibilities for funding including: Housing Investment Fund, Single Pot Infrastructure Fund, and Adult Education Budget)
- Environment Agency
- Natural England
- Historic England
- Highways England
- Cambridgeshire & Peterborough Joint Health and Wellbeing and Integrated Care Partnership Board

- Cambridgeshire & Peterborough Integrated Care Board
- Civil Aviation Authority
- Homes England
- Office of Rail Regulation
- Mayor of London
- Natural Cambridgeshire (Local Nature Partnership)

Other Duty to Co-operate bodies specified in the Regulations but considered not to apply in the context of the Greater Cambridge are:

- Marine Management Organisation
- Coal Authority
- Transport for London

4. Overview of Duty to Cooperate engagement

Duty to Cooperate engagement between Cambridge City Council and South Cambridgeshire District Council

4.1 The agreement to prepare a statutory joint local plan between Cambridge City Council and South Cambridgeshire District Council fundamentally reflects the operation of the duty to cooperate across the authorities' shared geography of Greater Cambridge. This agreement is underpinned by the geographical and functional relationship between the two authorities' administrative areas and the common strategic issues that need to be addressed. Preparation of an extensive joint evidence base informing the strategy and policies included in the plan are clear evidence of the duty being implemented in practice. This Statement of Compliance does not document all the details related to the duty in this regard, as these are evident from all the studies and related documentation supporting the plan. It focuses instead on duty to cooperate issues and engagement with the other bodies identified in Section 2.

Duty to Cooperate engagement with other bodies

4.2 Greater Cambridge 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.

4.3 A series of consultation and engagement activities have underpinned the work leading up to this Draft Plan stage. Several duty to co-operate bodies have engaged in these in their roles as statutory consultees or due to their wider interest in future growth in the area. These consultation and engagement activities are documented in detail in the separate Consultation Statement, but in summary they comprise:

- **2019:** Preliminary engagement before Issues and Options consultation
- **January-February 2020:** First Conversation (Regulation 18 Issues and Options consultation)
- **December 2020- Spring 2021:** Further engagement before First Proposals consultation (Regulation 18 Preferred Option Consultation)
- **Summer 2021-Summer 2025:** Further engagement before Regulation 18 Draft Plan consultation

4.4 Additionally, specific, targeted engagement with the duty to cooperate bodies to date has been undertaken through roundtable events, bilateral/ trilateral meetings and direct email communication.

2020-2021: Initial bilateral and roundtable duty to cooperate meetings

- 4.5 Initial bilateral duty to cooperate meetings were held with neighbouring local authorities (set out in Section 2.2) and with the key prescribed duty to cooperate bodies (Environment Agency, Historic England, Highways England, Cambridgeshire and Peterborough Combined Authority, Natural Cambridgeshire and Natural England) to establish relationships, and to begin more detailed substantive discussion of the relevant strategic matters. These took place online in Autumn 2020.
- 4.6 In parallel with the bilateral meetings, all prescribed duty to cooperate bodies were contacted to seek their views on the [Duty to Cooperate Proposed Approach document \(May 2020\)](#).
- 4.7 The first duty to cooperate roundtable meeting was held on 22 September 2020 and all neighbouring local authorities and duty to cooperate prescribed bodies were invited. The roundtable included a presentation on the proposed approach to duty to cooperate followed by a roundtable discussion. A further roundtable meeting was held in December 2020 following the publication of evidence to support the Local Plan.
- 4.8 A further series of bilateral and trilateral meetings were held with neighbouring local authorities and with the key prescribed duty to cooperate bodies from December 2020 into the Spring of 2021. These meetings provided an opportunity for the Councils to receive updates on the relevant work programmes of the neighbouring local authorities and other prescribed duty to cooperate bodies, followed by a discussion of any strategic cross boundary issues.

2021-2025: group and bilateral meetings focused on specific strategic cross-boundary matters

- 4.9 Between the First Proposals 2021 and Draft Plan 2025, duty to cooperate engagement has focused on the identified strategic cross-boundary matters, as explained in section 4 below. Engagement has taken the form of group and bilateral meetings (a high level record of these meetings is included in Appendix 2).

Other ongoing groups supporting the duty to cooperate

Joint Planning Advisory Group

- 4.10 To support the development of a shared position for the Greater Cambridge Local Plan and also the North East Cambridge Area Action Plan, the councils set up the Joint Local Planning Advisory Group in 2020 (renamed Joint Planning

Advisory Group JPAG in 2025). The [Terms of Reference for JPAG](#), renewed in summer 2025 set out that it is a non decision-making joint member group intended to “enable and support the efficient and effective development and coordination of spatial planning and related policy for the Cambridge City and South Cambridgeshire districts”. The Advisory Group includes a representative of Cambridgeshire County Council. Minutes of meetings held can be found on the [JPAG agendas and minutes webpage](#).

Greater Cambridge Strategic Transport Officer Liaison Group

4.11 The Greater Cambridge Strategic Transport Officer Liaison Group (previously named the Greater Cambridge Local Plan Transport Sub-Group) was set up to facilitate preparation of a robust Transport Evidence Base supporting the Greater Cambridge Local Plan; and to document input and engagement from the various transport-related agencies and authorities to the transport planning aspects of the Local Plan. The Strategic Transport Officer Liaison Group includes membership of the following bodies:

- Greater Cambridge Shared Planning (representing Cambridge City Council and South Cambridgeshire District Council)
- Cambridgeshire and Peterborough Combined Authority (as the Local Transport Authority)
- Greater Cambridge Partnership
- Cambridgeshire County Council (as the Local Highways Authority)
- National Highways
- Network Rail
- Standing invitation to attend for England's Economic Heartland.

4.12 The Strategic Transport Officer Liaison Group met between 2020 and 2023 on a six-weekly basis. Since the inception of work on the Greater Cambridge Transport Strategy in 2024 the Strategic Transport Officer Liaison Group has not met on a regular basis, noting that all Cambridgeshire partners are actively involved in the Transport Strategy work. However, the Strategic Transport Officer Liaison Group was convened twice in May and July 2025 to enable engagement with National Highways and Network Rail regarding the Local Plan and Transport Strategy ahead of the draft plan consultation.

Strategic cross-boundary matters

4.13 The Councils' initial thinking on strategic matters of relevance to the Local Plan were consulted on as part of the First Conversation (Regulation 18 Issues and Options Consultation) at the beginning of 2020.

4.14 Further to this, relevant cross-boundary strategic matters were identified through a scoping exercise, which involved an assessment of all the strategic

policies identified in the National Planning Policy Framework, together with commentary on why each topic might or might not constitute a strategic cross-boundary matter (as determined by legislation) relevant to Greater Cambridge.

4.15 As part of the first roundtable and first sequence of bilateral meetings, neighbouring local authorities and other prescribed duty to cooperate bodies were asked for their views on the identified strategic cross boundary matters.

4.16 The agreed strategic cross boundary matters for Greater Cambridge are as follows:

- Strategy:
 - scale of growth, including housing need and employment
 - pattern of growth, including Green Belt and Strategic developments on the boundary of Greater Cambridge
 - Delivery of growth, including land supply, water supply, and wastewater treatment
- Gypsy & Traveller accommodation needs
- Strategic developments near to the boundary of Greater Cambridge
- Transport
- Wildlife habitats, green infrastructure and landscape
- Energy, carbon offsetting and renewable energy generation
- Social, health and community infrastructure

Strategic matters as per the duty to cooperate are not the same as strategic policies (National Planning Policy Framework), but any strategic matters should be addressed by strategic policies.

4.17 The following section sets out for each of the strategic matters:

- Background
- Relevant duty to cooperate bodies
- Summary of responses to the First Conversation consultation from duty to cooperate bodies (where substantive points of importance to the plan were made)
- Summary of responses to the First Proposals consultation from duty to cooperate bodies (where substantive points of importance to the plan were made)
- Relevant evidence, including jointly prepared evidence
- Engagement ahead of Draft Plan consultation
- Current position

4.18 The detailed discussions and meetings that took place with the duty to cooperate bodies (and others prescribed bodies) prior to the First Proposals were included in the appendices of the Statement of Compliance published with

the First Proposal Consultation. This version of the statement includes details of the discussions and meetings that have taken place after the First Proposals Consultation and prior to the Draft Plan. These are recorded in the appendices.

5. Strategy: pattern, scale and delivery of growth

Context

- 5.1 National planning policy explicitly identifies the meeting of development needs as a strategic matter to be addressed in the Statement of Common Ground, particularly as choices about a potential spatial strategy to meet such needs may have implications for neighbouring areas.
- 5.2 In principle, the levels and location of housing and employment growth could have cross-boundary implications particularly due to the resulting commuting patterns.
- 5.3 Water issues are shaped by river basins which cross boundaries. Greater Cambridge is in a water stressed area with low levels of rainfall. A particular challenge currently is the ecological impact of water abstraction, including from development, on the chalk streams that supply the River Cam. The provision of an adequate and sustainable water supply, as well as waste water treatment capacity, are cross-boundary issues that are central to the delivery of the development strategy.

Relevant bodies

- 5.4 The relevant bodies are as follows:
- Neighbouring local authorities
 - Cambridgeshire & Peterborough Combined Authority
 - Cambridgeshire County Council
 - Environment Agency
 - Natural England
 - Water Resources East (not relevant to the duty to cooperate but central to the strategic cross-boundary matter)
 - Anglian Water (not relevant to the duty to cooperate but central to the water supply and waste water treatment strategic cross-boundary matters)
 - Cambridge Water (not relevant to the duty to cooperate but central to the water supply strategic cross-boundary matter).

Summary of responses to the First Proposals consultation from duty to cooperate bodies

- 5.5 In their responses to the First Conversation consultation, neighbouring authorities supported the proposed vision and for the proposal for SCDC and CCC to meet in full their own objectively assessed needs. Central Bedfordshire Council commented 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, was an appropriate level of growth to deliver in Greater Cambridge over the plan period. The inclusion of sites in the most sustainable locations around the Cambridge urban area (with the majority of OAN to be provided for in the core preferred strategic sites of North East Cambridge, Cambridge East and Cambourne) and on the outskirts of the City was supported. There was support for the proposed strategy to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live.
- 5.6 The Environment Agency and Natural England raised concerns around the provision of sufficient sustainable water supplies for the proposed growth over the plan period without further detriment to the natural environment. The Environment Agency supported the idea of development limited to levels that can be supported by a sustainable water supply (phased delivery) until the time the strategic infrastructure is in place. Natural England welcomed the Councils' recognition in the First Proposals around the challenges in identifying long-term and interim solutions to the current water resource crisis to enable sustainable development without further detriment to the natural environment, but advised that the Councils need to act urgently, in collaboration with relevant stakeholders, to identify strategic and interim water resource/infrastructure solutions to ensure any level of proposed development is delivered sustainably. Neighbouring authorities stressed that the plan (and its evidence base) would need to clearly demonstrate that the needs of growth can be met by water companies' plans without causing deterioration to the water environment.
- 5.7 There was support for the proposed policy approach for stringent water efficiency standards in new developments from both Huntingdonshire District Council and the Environment Agency, who agreed that the emerging evidence justified a tighter proposed standard of 80 litres/person/day for housing and supported the proposed standard for non-residential development.
- 5.8 Waste water treatment issues arose in 2025, subsequent to the First Proposals consultation. As such this was not a focus of comments in that earlier consultation.

Evidence

5.9 The main relevant studies include:

- Greater Cambridge Local Plan: Employment & Housing Evidence Update 2025
- Greater Cambridge Local Plan Transport Evidence Report 2025 (for sites)
- Greater Cambridge Housing & Employment Land Availability Assessment 2025
- Greater Cambridge Water Supply Evidence 2025
- Greater Cambridge Water Cycle Study

Engagement ahead of Draft Plan consultation

5.10 Through bilateral meetings the councils have discussed with duty to cooperate partners the following strategic cross-boundary matters:

- Green Belt
- Sites with cross-boundary implications
- Water supply and waste water capacity

Green Belt

5.11 Testing of options for the new local plan has included consideration of the role that land in the Cambridge Green Belt could play in a sustainable development strategy. A particular consideration was whether any exceptional circumstances exist that would necessitate a review of the defined Green Belt boundaries as part of the strategy for the new local plan. Therefore, in line with paragraph 147 of the National Planning Policy Framework, the councils have engaged with neighbouring authorities in bilateral meetings to raise the issue, and then via a letters (in both 2021 and again in June 2025) to ask if they could confirm whether there were any opportunities in their area that could accommodate any of the housing need identified in Greater Cambridge, and if so where these are, in order to inform consideration of any amendments to the Green Belt. All neighbouring authorities that responded to the June 2025 letter have not identified any opportunities in their areas to assist Greater Cambridge in meeting its needs (see Appendix 1).

Strategic developments on the boundary of Greater Cambridge

5.12 The Councils engaged with relevant neighbouring authorities on sites proposed through the call for sites to the Greater Cambridge Local Plan process on or adjacent to South Cambridgeshire's boundary, in particular with North Hertfordshire District Council, noting three site submissions adjacent to Royston and a new settlement proposal at Ashwell and Morden very close to North Hertfordshire.

5.13 Noting that delivery of these sites would be dependent upon infrastructure within North Hertfordshire or else have significant impacts on that district, we engaged with North Hertfordshire District Council to confirm their in-principle view of development at these locations. Their letter responding to our request for comment following this engagement is at Appendix 1 The Councils' actions in response to this engagement is set out in the Development Strategy Topic Paper.

5.14 The Councils also sought engagement with Central Bedfordshire Council, Bedford Borough Council and Huntingdonshire District Council via bilateral meetings regarding proposed development at Cambourne North including the relationship with the emerging transport strategy (see transport section below). These meetings highlighted that transport was the main potentially significant cross-boundary matter.

Delivery of growth

5.15 Since the First Proposals stage the Councils have engaged actively and over a sustained period to contribute to work addressing the area's water supply challenges, working alongside all relevant agencies and stakeholders as convened by the Cambridge Water Scarcity Group; (members comprise the Ministry for Housing Communities and Local Government, the Department for Environment Farming and Rural Affairs, the Environment Agency, Cambridge Water, Anglian Water, Water Resources East, Homes England and the Councils). Work has involved numerous meetings and sharing of evidence to identify shorter and longer term solutions.

5.16 Government announced in August 2025, shortly before publication of the draft Local Plan that it would not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) through its Housing Infrastructure Fund. This means that there is currently uncertainty as to how future waste water treatment serving Cambridge will be provided. The Councils have engaged with Anglian Water and the Environment Agency and commissioned a Draft Water Cycle Strategy that explores this – Anglian Water have contributed to this evidence base. Ahead of the Proposed Submission stage in 2026, the Councils will continue to engage with relevant partners to confirm and refine the position.

Current position

Scale of growth

5.17 The draft plan consultation identifies that the Local Plan will meet the following objectively assessed needs for development in the period 2024-2045:

- 72,300 jobs

- 48,195 homes.

5.18 The objectively assessed needs are based on an understanding that the up to date Standard Method calculation outcome for Greater Cambridge supports the most likely jobs forecast for the area. This jobs forecast is primarily derived from jobs that are specifically forecast to arise in the Greater Cambridge area. As such, these jobs are not expected to be drawn from outside the area and, consequently, there are no cross-boundary implications currently arising from Greater Cambridge's housing or employment development needs.

Pattern of growth

Green Belt

5.19 There are no Duty to Cooperate issues currently arising from the preferred strategy with regard to the Green Belt (apart from those arising between Cambridge and South Cambridgeshire, which will be fully addressed through the preparation of this joint plan).

Strategic developments on the boundary of Greater Cambridge

5.20 The Councils consider that the only site included within the preferred development strategy which has potential for substantive cross-boundary impacts is Cambourne North, relating to its transport (noting that sites referred to above close to North Hertfordshire are not included in the preferred strategy). Further evidence on Cambourne North will be prepared ahead of Proposed Submission stage; this may create the need for further engagement with neighbouring authorities to ensure no adverse impacts and coherence of transport provision.

Delivery of growth

Land supply

5.21 Sufficient development commitments and new sites exist to accommodate the identified development needs within Greater Cambridge without the need to request that one or more neighbouring authorities should assist under the duty to cooperate. Equally, to date no other local authority has asked the Councils to meet any of their development needs.

Water, including supply, quality, wastewater and flood risk

Water supply

- 5.22 A range of measures are proposed to ensure an adequate and sustainable water supply. In the shorter term, a range of measures are being implemented to improve the efficiency of how water is used. In the medium term to support delivery of the sites in the emerging plan, a pipeline connection to Grafham Water will boost supplies to the Cambridge area from 2032, and the Fens Reservoir will further increase supplies from the mid 2030's. The draft Local Plan responds to the issue via the phasing of development and by including policies that would require new developments to have a level of water efficiency beyond national levels. Cambridge Water Company adopted their new water plan in spring 2025, and this will be reviewed every 5 years. The Regional Water Plan identifies that in the longer term, into the 2040's and beyond, adaptive approaches and new infrastructure such as desalination will need to be applied to ensure there continues to be water available to meet needs whilst protecting the environment.
- 5.23 In summary, our evidence demonstrates that with the measures proposed by government and the water industry, and with the policies set out in the Plan, adequate water supply will be available to support delivery of the draft plan allocations in a way that supports the goal of reducing impacts on our chalk streams.

Waste water treatment

- 5.24 The Government's announcement that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP), means that there is currently uncertainty regarding the programme for future waste water treatment serving Cambridge. Assuming the CWWTP relocation does not take place, upgrades will be required to the existing CWWTP at North East Cambridge to ensure it can deal with future wastewater flows in a sustainable way, and Anglian Water have committed to exploring the alternative measures needed over the coming months.
- 5.25 The Councils have engaged with Anglian Water and the Environment Agency and prepared a Draft Water Cycle Strategy that explores future needs. We now expect Anglian Water to consider and plan to accommodate future needs as they prepare the DWMP. We will continue to engage with relevant partners to confirm and refine the position for the Proposed Submission stage of plan-making.

Summary

5.26 Cambridge City Council and South Cambridgeshire District Council agree on the approach to strategy, and there are no areas of disagreement with other parties on this strategic matter. The authorities will continue to engage with neighbouring authorities and other prescribed bodies regarding the strategy in the period leading up to the Proposed Submission stage of plan-making.

6. Gypsy and Traveller accommodation needs

Context

6.1 By definition, Gypsy and Traveller accommodation needs are a strategic matter crossing administrative boundaries.

Relevant bodies

6.2 Neighbouring authorities.

Evidence

6.3 Cambridge City Council and South Cambridgeshire District Council have prepared a joint Gypsy & Traveller Accommodation Needs Assessment for Greater Cambridge. As part of the process, all neighbouring local authorities were consulted.

Summary of responses to the First Proposals consultation from duty to cooperate bodies

6.4 In their responses to the First Proposals consultation, neighbouring authorities commented that the Local Plan should seek to ensure adequate provision is made in a diverse range of locations to meet all Gypsy, Traveller, Travelling Showpeople, other Caravan dwellers and boat dwellers' needs. The Environment Agency (EA) recommend that, given the higher vulnerability of this type of accommodation, flood risk should be a key consideration in identifying appropriate sites and in formulating any policy criteria for sites.

Evidence

6.5 The Greater Cambridge Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople and Bargee Travellers and other caravan and houseboat dwellers was published in September 2024. An Addendum report was published in September 2025 to extend the period of need considered up to 2045 to match the revised end period of the draft Local Plan.

The final assessment has identified a need between 2023/24 and 2044/45 for 157 gypsy and traveller residential pitches in South Cambridgeshire and 2 in Cambridge, alongside 20 residential plots for travelling showpeople in South Cambridgeshire. No need was identified for travelling showpeople residential plots in Cambridge.

Engagement ahead of draft Local Plan consultation

6.6 The Councils are proposing to meet the identified accommodation needs within Greater Cambridge for Gypsies, Travellers, Travelling Showpeople and Bargee Travellers and other caravan and houseboat dwellers in full. The Councils have not therefore specifically engaged with neighbouring local authorities on how to meet their need for Gypsy and Traveller pitches and Travelling Showpeople plots ahead of the draft plan. However, officers have responded to requests from consultants carrying out Accommodation Needs Assessments for neighbouring local authorities for thoughts on Gypsy and Traveller needs in the area, and whether there are any cross-boundary issues.

Current position

6.7 The draft Local Plan sets out a strategy to address needs within Greater Cambridge through a series of measures including making more productive use of existing sites, new sites for permanent pitches associated with major development sites and the assessment of windfall sites through a criteria-based policy.

6.8 There are no areas of disagreement on this strategic matter.

Transport

Context

6.9 The scale of the Cambridge Travel to Work Area and congestion on rail and road routes within and crossing the boundaries of Greater Cambridge make transport a strategic cross-boundary issue. The Councils are active partners to various transport policy programmes led by the Combined Authority, including the Local Transport Plan. There are also a number of strategic transport infrastructure projects proposed in the area which will cross the boundaries of Greater Cambridge, including in particular East West Rail.

Relevant bodies

- Neighbouring districts and County Councils
- Cambridgeshire & Peterborough Combined Authority – as the Local Transport Authority
- Cambridgeshire County Council – as the Local Highway Authority
- Network Rail
- Highways England
- Greater Cambridge Partnership (whose membership includes other duty to cooperate partners).

Summary of responses to the First Proposals consultation from duty to cooperate bodies

- 6.10 Neighbouring Authorities identified the importance of the Plan in enabling transport across administrative boundaries whilst addressing any cross-boundary impacts. Responses highlighted the need to consider key transport links and schemes within the plan area and beyond with reference made in this regard to strategic road and rail routes (including A14, A1, A428, A1037), strategic infrastructure schemes (East West Rail and Greater Cambridge Partnership (GCP), and potential future emerging transport strategies.
- 6.11 Central Bedfordshire Council (CBC) suggested that future transport impact assessments and traffic modelling 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 cross boundary strategic and local road network. CBC also highlighted the need for continued engagement between SCDC, CCC and neighbouring local/transport authorities on new and upgraded strategic scale infrastructure opportunities and challenges; with specific reference made to potential sustainable opportunities for growth at Cambourne (subject to confirmed East West Rail route) and to any upgrades to existing corridors).
- 6.12 Huntingdonshire District Council commented on the need to consider the timing of delivery for future development at Cambourne in relation to new strategic infrastructure schemes (East West Rail and Cambourne to Cambridge GCP scheme) to enable increased public transport use, provide a lower emissions scenario for the allocation and to minimise the impacts of increased commuting and congestion on the A428.

Evidence

6.13 The main relevant studies include:

- Greater Cambridge Local Plan Transport Evidence Report 2025
- Draft Greater Cambridge Local Plan: New Strategic Allocations Assessment Transport Mitigation Measures

Engagement ahead of draft plan consultation

Partners' transport projects and programmes

6.14 The Greater Cambridge authorities are fulfilling their duty to cooperate role in part as active partners in the development of transport evidence studies, strategies and infrastructure projects and that go beyond the boundaries of Greater Cambridge, including:

- **Cambridgeshire & Peterborough Local Transport Plan** (working with Cambridgeshire & Peterborough Combined Authority and the other Cambridgeshire authorities) – the councils are engaged with the Combined Authority in relation to the refresh of the Local Transport & Connectivity Plan, adopted in November 2023. We are also actively engaged in the preparation of the Greater Cambridge Transport Strategy (see more below).
- **East West Rail Central Section proposals** (working with East West Rail Company, East West Rail Mainline Partnership, Cambridgeshire & Peterborough Combined Authority, Cambridgeshire County Council, Huntingdonshire District Council and Central Bedfordshire Council and Bedford Borough Council) – the Councils continue to work with local partners Cambridgeshire County Council to provide aligned inputs to the East West Rail project.
- **East West Rail Eastern Section** (working with Cambridgeshire County Council and local authority partners in Norfolk and Suffolk) – the Councils continue to engage with partners in advocating for enhancements to rail services into Cambridge from the east.
- **Royston to Granta Park Strategic Transport Study** (working with Cambridgeshire & Peterborough Combined Authority, Cambridgeshire County Council, Uttlesford District Council, Essex County Council, Hertfordshire County Council, North Hertfordshire District Council and Highways England) – the Councils contributed to the Strategic Outline Business Case as a partner to this project.

Greater Cambridge Local Plan site assessments

- 6.15 Through the Housing and Economic Land Availability Assessment (HELAA) process, the councils engaged with Cambridgeshire County Council as Local Highways Authority to understand the impacts on the local road network of sites submitted via the call for sites. As part of the same process, the Councils engaged with National Highways to understand, at a strategic level, the possible implications on the strategic road network for development across different areas of the districts. This engagement confirmed a zonal led approach based on existing trunk road and junction capacity. Each site considered through the HELAA was reviewed against the zone it was located.

Greater Cambridge Transport Strategy

- 6.16 For the draft plan, the Councils have engaged extensively with the Cambridgeshire and Peterborough Combined Authority as Local Transport Authority and Cambridgeshire County Council as Local Highways Authority, and have engaged with other bodies as relevant including National Highways, to form a shared understanding of strategic transport matters relevant to the Greater Cambridge Local Plan as described below.
- 6.17 Of note, the Greater Cambridge Transport Strategy currently being developed by the Cambridgeshire and Peterborough Combined Authority will include the mitigation and infrastructure requirements necessary to promote sustainable travel as part of the Local Plan development strategy. The foundations for the Transport Strategy are improvements to key corridors, that will provide significant transport capacity to support the delivery of committed development. The Councils are working alongside the Combined Authority, County Council and Greater Cambridge Partnership to support the development of the Transport Strategy and to support the delivery of appropriate schemes.

Current position

- 6.18 The transport evidence supporting the draft Local Plan development strategy identifies the additional site-specific mitigation and infrastructure required to enable delivery of the new sites included within the development strategy (Draft Greater Cambridge Local Plan: New Strategic Allocations Assessment Transport Mitigation Measures). These are agreed by the relevant Duty to Cooperate partners. The Greater Cambridge Transport Strategy will draw on this understanding, but will also identify interventions to address strategic transport issues, including the severe congestion challenges experienced in Cambridge.
- 6.19 The Combined Authority has published a Statement of Intent ahead of the draft Local Plan consultation confirming its commitment that to support the

submission of the Local Plan, the Transport Strategy will set out solutions to confirm both the transport infrastructure requirements associated with the strategic sites proposed in the Greater Cambridge Local Plan, and initiatives and policies to deal with wider transport challenges across Greater Cambridge. In combination these site specific and strategic measures will demonstrate that the sites included in the plan can be delivered.

6.20 In summary, all relevant parties are committed to further collaboration and engagement to support the progression of the Greater Cambridge Transport Strategy to support the submission of the Local Plan; as such there are no areas of disagreement on this strategic matter.

Wildlife habitats, green infrastructure and landscape

Context

6.21 Wildlife and the natural environment do not adhere to administrative boundaries. It is therefore important to consider how matters relating to wildlife habitats, green infrastructure and landscape will effectively be planned for across boundaries. These matters have been addressed through specific duty to cooperate meetings and by involving relevant bodies in the process of preparing the evidence base which has informed the draft plan.

Relevant bodies

- Natural Cambridgeshire (Local Nature Partnership)
- Environment Agency
- Natural England
- Cambridgeshire and Peterborough Combined Authority
- Cambridgeshire County Council
- Neighbouring authorities

Summary of responses to the First Proposals consultation from duty to cooperate bodies

6.22 In their responses to the First Proposals consultation, neighbouring authorities, the Environment Agency and Natural England supported the plan's aim to increase and improve the network of habitats for wildlife and green spaces for people, whilst ensuring that development leaves the natural environment better than it was before and is directed where it will have least environmental impact. There was also support from several neighbouring authorities for the proposed policy approach to require 20% Biodiversity Net Gain. Suffolk County

Council recommended that the plan take a positive approach towards contributing to the aims of statutory Local Nature Recovery Strategies.

- 6.23 There was continued recognition from neighbouring authorities that the ecological network does not stop at administrative boundaries. The importance of collaboration on green infrastructure and biodiversity issues was highlighted through comments received from Huntingdonshire District Council in regard to joint working to protect and promote the interconnectedness of Area 8 and West Cambridge Hundreds Ancient woodlands.

Evidence

- 6.24 The main relevant studies include:
- Greater Cambridge Green Infrastructure Opportunity Mapping Recommendations Report
 - Integrated Water Cycle Study (see strategy topic) which has informed the authorities' understanding of the impact of water abstraction on chalk streams.
 - Greater Cambridge Local Plan Habitat Regulations Assessment 2025

Engagement ahead of Draft Plan consultation

- 6.25 Engagement took place with Natural England, the Local Nature Partnership, neighbouring authorities and partners through workshops in preparation of the evidence referred to above.
- 6.26 Between 2024 and 2025 the Councils' main cross-boundary biodiversity focus has been on contributing to the development of the Cambridgeshire Local Nature Recovery Strategy alongside all the relevant bodies listed above, for which there has been regular engagement.

Current position

- 6.27 There is broad support from the relevant bodies to the approach taken and, therefore, no areas of disagreement on this strategic matter, noting in particular that the draft plan aligns well with the emerging Cambridgeshire and Peterborough Local Nature Recovery Strategy (see Biodiversity and Green Spaces Topic Paper Appendix 1: How the Draft Greater Cambridge Local Plan has regard to the Cambridge and Peterborough Local Nature Recovery Strategy – explanatory note). The Councils are committed to working with all partners to reduce the impact of water abstraction on chalk streams including in terms of habitats – see more detail above under Strategy: Water.

- 6.28 The Councils will engage further with Natural England ahead of Proposed Submission in particular regarding green infrastructure standards and recreational impacts of development on nature sites.

Energy, carbon offsetting and renewable energy generation

Context

- 6.29 The current electricity grid infrastructure affects supply across administrative boundaries. Future energy capacity is also an issue noting the scale of growth envisaged in the Local Plan. Carbon offsetting might best be done at a wider than Greater Cambridge level, on the basis that there may be better opportunities to offset if considered over a wider area.

Relevant bodies

- UK Power Networks (UKPN)
- National Energy Systems Operator (NESO)
- Greater Cambridge Partnership
- Cambridgeshire & Peterborough Combined Authority
- Government

Summary of responses to the First Proposals consultation from duty to cooperate bodies

- 6.30 In their responses to the First Proposals consultation, neighbouring authorities and relevant bodies supported the proposed approach to net zero carbon. Cambridgeshire County Council highlighted the change to the Building Regulations which came into force on 1 January 2019 which mean that all new buildings owned and occupied by public authorities must be 'Nearly Zero Energy Buildings' and that due to this and specific targets within policy CC/NZ which increase capital cost of construction, associated policies need to make clear the expectation on developers to meet such costs through section 106 agreements.
- 6.31 Cambridgeshire County Council noted the potential for interaction with the Cambridgeshire and Peterborough Minerals and Waste Local Plan in respect of energy from waste and district heating.
- 6.32 Huntingdonshire District Council highlighted that any development for renewable or low carbon energy within proximity of the Huntingdonshire boundary should consider the Huntingdonshire Local Plan policy LP35 in its assessment: namely that landscape, townscape and heritage impacts must be addressed as part of the development.

Evidence

- 6.33 The main relevant studies include:
- [Evidence](#) informing the South Cambridge Future Electricity Demand project
 - Cambridgeshire Local Area Energy Plan (to be published early 2026)
 - Greater Cambridge Net Zero Carbon evidence base, Bioregional (2021): [Net Zero Carbon – Offsetting \(2021\)](#)

Engagement ahead of draft plan consultation

- 6.34 The Councils engaged with the network systems operators (UKPN), neighbouring authorities and other relevant partners to ensure a coherent approach to energy and carbon issues within and outside Greater Cambridge, including involving these parties in the process of preparing the identified evidence base and through specific duty to cooperate meetings where appropriate. In particular, this included collaborating with relevant bodies on the Greater Cambridge Partnership's South Cambridge Future Electricity Demand project to support the delivery of new substation infrastructure in Cambridge East and Trumpington; and on the Net Zero Carbon evidence base, which is considering offsetting opportunities. The Councils are also collaborating with Cambridgeshire County Council and neighbouring authorities to develop the Local Area Energy Plan, which will consider the energy requirements associated with growth and identify where new and/or reinforcement of existing infrastructure will be required.

Current position

- 6.35 The councils are continuing to engage with UKPN, neighbouring authorities and other relevant partners on the Local Area Energy Plan as well as engaging with the National Energy Systems Operator (NESO) on the emerging Regional Energy Strategic Plan, which will help ensure that local areas get the energy infrastructure they need to meet local net zero and growth ambitions, and help communities to access reliable, clean and affordable energy.

Social, health and community infrastructure

Context

- 6.36 Cambridge plays a sub-regional and regional role in terms of social, health and community infrastructure provision, as follows:
- **Education provision** – further education colleges in Cambridge attract students from a wide area beyond the boundaries of Greater Cambridge.

- **Health** – Located at the Cambridge Biomedical Campus in South West Cambridge, Addenbrooke's Hospital and the Rosie Hospital serve a regional healthcare role, and Addenbrooke's is also a leading national centre for specialist treatment for rare or complex conditions. Royal Papworth Hospital, the UK's leading heart and lung hospital, moved to the Cambridge Biomedical Campus in 2019, adding to the concentration of health services and expertise located in Cambridge.
- **Cultural** – The range of museums, theatres and other performance venues in and around Cambridge form a significant cultural attraction drawing visitors from beyond the boundaries of Greater Cambridge.
- **Leisure and retail** – Cambridge is a sub-regional retail and leisure centre, driven in part by its role as a tourist destination and an internationally recognised place to study.
- **Tourism** – related to the above two points, Cambridge is a national and international visitor destination.

Relevant bodies

- Cambridgeshire & Peterborough Joint Health and Wellbeing and Integrated Care Partnership Board
- Cambridgeshire & Peterborough Integrated Care Board (we note that NHS organisational structures remain subject to change)
- Cambridgeshire County Council (Libraries, Education, Social Services, Adult Care)

Summary of responses to the First Proposals consultation from duty to cooperate bodies

6.37 The relevant health bodies noted the well-established connection between planning and health, supporting the plan policies seeking to create more sustainable communities and to support general health and wellbeing through well designed places. The NHS requested greater support in seeking to deliver more sustainable facilities and services to meet the needs of the population, and identified the need to address and fund strategic, as well as local, priorities for health and care services through appropriate planning obligations. It also asked that the councils engage them in the process when establishing future policy for planning obligations.

Evidence

6.38 An Infrastructure Delivery Plan (IDP) has been produced to support the draft local plan. This quantifies the needs for all types of infrastructure, including social, health and education, associated with the growth proposed in the plan. A

Retail and Leisure study has also been prepared, while a Community Facilities Audit has been undertaken and published (May 2025).

Engagement ahead of Draft Plan consultation

6.39 The Councils continue to engage on health issues through meetings with relevant health bodies to facilitate alignment of planning with emerging health infrastructure strategies (notwithstanding that the NHS organisational structures remain subject to change), and engaged with the NHS to inform preparation of the draft plan IDP. The Councils have engaged with Cambridgeshire County Council to inform the preparation of the IDP with respect to its education and social infrastructure responsibilities. The Councils will engage further with relevant health bodies prior to the Proposed Submission stage.

Current position

6.40 To date there are no specific duty to cooperate issues arising in relation to social, health and community infrastructure that would require substantive discussion with duty to cooperate bodies. However, this issue will be kept under review.

Heritage

Context

6.41 Greater Cambridge has a significant number of heritage assets, including some of national and international significance. The main cross-boundary implications arise from heritage assets likely to be affected by new allocations which fall within other districts. These are primarily between Cambridge and South Cambridgeshire (for example a number of heritage assets within South Cambridgeshire could be affected by development within Cambridge), but could also be relevant to the boundary with neighbouring authorities.

Relevant bodies

- Historic England

Evidence

6.42 Relevant evidence being prepared includes:

- Tall Buildings and Skyline Study
- A strategic Heritage Impact Assessment for Greater Cambridge, and site specific Heritage Impact Assessments for all allocations identified in the

draft Local Plan, to understand the potential impacts of development on heritage assets, including across administrative boundaries.

Summary of responses to the First Proposals consultation from duty to cooperate bodies

- 6.43 In general, Historic England welcomed the emerging plan (in particular the inclusion of a policy for the historic environment) and the work undertaken on the evidence base. However, key issues to be addressed were identified: site assessment and the need for Heritage Impact Assessments, to include appropriate policy criteria for the historic environment in the policy and a concern regarding densities and heights on edge of Cambridge sites.

Engagement ahead of Draft Plan consultation

- 6.44 The Councils have engaged with Historic England through bilateral meetings and in evidence-gathering work to ensure appropriate mitigation of heritage impacts, including engaging with Historic England in preparation of site-specific Heritage Impact Assessment work and reviewing of draft documents at previous consultation stages. The methodology for the Heritage Impacts Assessments was shared and agreed with Historic England in advance of the work being prepared as well as draft outputs shared for review.

Current position

- 6.45 There are no proposed allocations on the Greater Cambridge's outer boundary such that there are no cross-boundary heritage matters arising from that location. Potential cross-boundary heritage impacts between Cambridge and South Cambridgeshire for sites close to this boundary have been addressed via site-specific Heritage Impact Assessments to inform the site selection and policy drafting process, in response to Historic England's request for these.

7. Conclusion

- 7.1 This statement outlines the active and ongoing cooperation that has led up to and informed the Draft Greater Cambridge Local Plan. Cooperation will continue towards preparation of and consultation on the proposed submission plan. The Compliance Statement has, and will be updated at, each stage of the plan making process. Cooperation has involved prescribed bodies, neighbouring authorities and other organisations relevant to the duty to cooperate. The Compliance Statement demonstrates that the councils have complied with duty to cooperate requirements in Section 110 of the Localism Act, Section 33A of the

Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework.

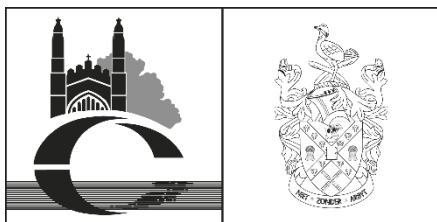
Appendices

Appendix 1: Letter regarding Green Belt and the Duty to Cooperate, and responses (prior to Draft Plan)

Letter sent to neighbouring Local Planning Authorities (as attachment via email) on 4 June 2025

This letter was sent to:

- Central Bedfordshire Council
- Huntingdonshire District Council
- East Cambridgeshire District Council
- West Suffolk Council
- Braintree District Council
- Uttlesford District Council
- North Hertfordshire District Council



GREATER CAMBRIDGE SHARED PLANNING

South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

www.scambs.gov.uk | www.cambridge.gov.uk

Team: Policy, Strategy and Economy
Contact: Stuart Morris
Direct dial: 01954 713694

Our ref: Green Belt and the Duty to Cooperate
04 June 2025

Dear x,

Greater Cambridge Local Plan – Green Belt and the Duty to Cooperate

As you know, we are in the process of preparing the Greater Cambridge Local Plan. Following the First Proposals consultation 2021 and Development Strategy Update 2023, we are now preparing to consult on a draft plan later this year.

The draft plan consultation will include a preferred strategy, and in weighing up the choices available we are looking at whether there may be exceptional circumstances justifying Green Belt release. NPPF paragraph 137 states that before concluding that exceptional circumstances exist, the planning authority should demonstrate it has examined fully all other reasonable options for meeting its identified need for development, including whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.

As such, ahead of the First Proposals consultation we asked you whether there were any opportunities in your area that could accommodate any of the housing need identified in Greater Cambridge, and if so where these were. Given the passage of time since 2021, and the need for us to confirm a preferred strategy at draft plan stage, we would be grateful if you could confirm your response to this question again. If we receive positive responses from you and/or the other neighbouring authorities we will consider whether the opportunities suggested could form an appropriate part of our strategy.

Beyond the above mentioned NPPF Green Belt requirements we are not currently aware of other reasons for asking our neighbours whether they could accommodate our needs. We will update you if this position changes.

It would be helpful if you could provide your response by Friday 20th June. Thank you in advance for your response.

If you have any queries please contact Stuart Morris (stuart.morris@greatercambridgeplanning.org).

Regards,

Stephen Kelly
(Joint Director for Planning and Economic Development)

Reponses

1. Huntingdonshire District Council

Date Resonse Received: 24 July 2025

Greater Cambridge Local Plan – Green belt and the Duty to Cooperate

Thank you for reaching out under the duty to cooperate regarding your preferred strategy choices and whether there might be exceptional circumstances justifying Green Belt release. I note that you are preparing a draft Local Plan for consultation this year and are enquiring about the possibility of Huntingdonshire accommodating some of Greater Cambridge's identified need for residential development in preference to releasing land from the Green Belt should this be necessary.

In response to your previous enquiry on this issue prior to your First Proposals consultation in 2021 we expressed our significant concerns over the prospect of looking to release land in Huntingdonshire to help meet the needs of Greater Cambridge. Since that point we have started work on preparing an update to our Local Plan and are currently working to produce a Preferred Options draft Local Plan for consultation before the end of this year. However, our concerns remain valid.

You have not supplied proposed housing numbers this time to ascertain whether you are simply looking to meet the standard method number of homes, or as previously, a number significantly higher than this. NPPF paragraphs 27 and 11b refer only to collaborating on meeting unmet need for development not that as a neighbouring authority we might be required to accept additional development under the duty to cooperate to assist with meeting a higher aspirational housing target.

If you have demonstrated that it is not possible to meet your minimum level of housing need without releasing land from the green belt, then Huntingdonshire would endeavour to assist you in meeting this minimum figure. However, I have significant concerns with Greater Cambridge seeking to divest any additional aspirational housing growth to Huntingdonshire rather than looking to release land from the green belt.

In particular, the implications are liable to be substantial of housing being decanted to Huntingdonshire, rather than provided on land within the green belt in terms of overall sustainability and CO₂ emissions arising from promoting commuting, This would conflict with the outcomes of your Net Zero Carbon Study

which sought to minimise commuting distances and reduce the ability of your local plan to contribute towards meeting national net zero aspirations.

As part of the preparation of our Local Plan update, we have undertaken two calls for sites which have identified a reasonable potential supply of land within Huntingdonshire. However, much of this is subject to significant infrastructure and flooding constraints and the majority of the housing numbers would be delivered on very large scale strategic sites which are expected to be subject to lengthy lead-in times for delivery.

As a result of the substantial recent increases to the standard method housing number for the district, it is anticipated that we will require all of the most sustainable and deliverable of the sites potentially available to us to achieve delivery of our own minimum housing expectations.

I consider that we would face significant challenges in making land available to take additional need arising from yourselves. Thus, only if you are unable to make provision for the minimum housing need figure for Greater Cambridge, rather than any higher aspirational target, would I support working further with yourselves to identify whether Huntingdonshire can make any land available to help meet your needs. Even in such circumstances I have doubts over our ability to provide adequate alternative land for you that could support sustainable development.

Yours sincerely,

Clare Bond
Planning Policy Team Leader

2. East Cambridgeshire District Council

Date Resonse Received: 19 June 2025

I refer to your letter, dated 4 June 2025, relating to the above matter.

We thank you for notifying us that you are expecting to consult on the emerging Greater Cambridge Joint Local Plan (under Regulation 18) later this year.

In February 2020, our former Strategic Planning Manager, confirmed to you in writing that East Cambridgeshire District Council (E CDC) was not seeking to accommodate any unmet housing need from the Greater Cambridge area (should any unmet need arise).

I confirm this position remains the case today.

Yours sincerely

David Morren
Strategic Planning and Development Management

3. West Suffolk Council

No response was received.

4. Braintree District Council

No response was received.

5. Uttlesford District Council

Date Resonse Received: 25 June 2025

Many thanks for your email.

Uttlesford are currently at Examination with their Local Plan 2021-2041 and are anticipating consulting on Main Modifications in early autumn this year. The emerging plan is being examined under the December 2023 NPPF and meets the identified housing needs in full, with suitable headroom.

The Council have made clear that it intends to start work on its next plan quickly, from 2026 onwards, and that this next plan will provide a more effective mechanism to consider more strategic, and longer-term matters, which could include giving consideration to the potential for larger standalone Garden Communities. However, it should be noted that the next plan may be prepared in parallel to a Spatial Development Strategy for Essex, which may have responsibility for apportioning housing needs and addressing any future replacement for the Duty-to-Cooperate.

I trust this is helpful.

Kind regards,
Andrew

Dr Andrew Maxted (MRTPI)

Interim Planning Policy Manager

6. North Hertfordshire District Council

Date Resonse Received: 30 July 2025

Dear Stuart

Greater Cambridge Call for Sites – Response from North Herts Council

Thank you for your email and apologies for the delay in our response.

In your email of June 4 2025, you asked whether or not the Council would in principle be supportive of development at the following sites, submitted through the Greater Cambridge Local Plan Call for Sites:

- 47799: Land north of A505 Baldock Road, Royston
- 40106: Land to north and south of Ashwell street, Bassingbourn-Cum-Kneesworth
- 40511: Land to east of A505 and south of A10, Melbourn
- Ashwell and Morden Garden Town (additional site)

There are a number of issues of concern and/or where additional information would be required for the Council to fully consider the sites that have been put forward. At this stage, these are:

- Impact on the A505 and wider highway network of additional traffic;
- Impact on Baldock and Royston as the nearest existing centres;
- Impact on local infrastructure, both structural and social, e.g education, water, health care, shops;
- Impact on Ashwell and surrounding rural communities of any potential relocation of the existing Ashwell & Morden Station;
- (Linked to above) the extent to which these sites would be self-contained or be reliant on surrounding centres for facilities; any larger-scale sites should form a place / destination in their own right, with an appropriate range of supporting land uses rather than being residential urban extensions to Royston;
- The potential interrelationship of these sites with areas that may fall under consideration by North Herts in our own ongoing Local Plan review and / or wider joint work with surrounding authorities. This may include:
- Any sites or proposals which are predicated on the retention of Ashwell & Morden station in its current location; and / or
- Any sites or proposals adjoining our shared administrative boundaries which may merit joint consideration with land put forward in South Cambridgeshire;
- The extent to which any sites might reasonably be considered as contributing towards development needs arising from North(ern) Hertfordshire given their geographical proximity and functional linkages to the area;

- The extent to which any sites might reasonably contribute to, or help develop a planning or business case, for strategic infrastructure interventions in the broader 'A505 corridor';
- The approach or views of both our authorities should any of the sites have also been submitted to, and subsequently be selected for further consideration by, the Government's New Towns Task Force (or any similar / equivalent programme);
- There are areas of recreation space deficiency in Royston which might need to be considered when looking at open space requirements for these sites;
- The majority of three of the sites (47799, 40106 and the Garden Town proposal) are within the 1.9km Zone of Influence for the Therfield Heath SSSI, with the peripheral parts of those sites and site 40511 all falling within the 5.8km Zone of Influence. We prepared the Therfield Heath Mitigation Strategy (THMS) to address the recreational impacts from the proposed development allocations in the North Herts Local Plan. The views of Natural England should be sought about these potential development sites, as there is no consideration of any development outside North Hertfordshire in the THMS; and
- Any other impacts arising from more detailed technical analysis of the sites such as (but not necessarily limited to) landscape, flooding, ecology, heritage etc.

In your email you asked whether we would confirm whether or not North Herts Council would, in principle be supportive of development in these locations. Given that there is very little supporting evidence for us to look at, at this point we would not be in a position to confirm our support for (or opposition to) development in these locations.

We welcome the opportunity for further discussion on these sites and / or consideration of the matters above should you be minded to progress any of the above sites for potential allocation through your emerging plan.

These are officer comments only and have not been subject to political input or approval at this stage.

Yours sincerely

Clare Skeels

Senior Planning Officer

On behalf of Rachael Rooney, Interim Strategic Planning Manager

7. Central Bedfordshire Council

Date Resonse Received: 5 June 2025

Thank you for your email and letter dated 4th June in relation to the Greater Cambridge Local Plan, and specifically the Green Belt and the Duty to Cooperate.

Central Bedfordshire Council commenced a review of the adopted Local Plan (2015-2035) in January 2022, which concluded that due to the number of changes at both a national and local level, a full update to the Local Plan was necessary. The full update commenced in November 2023 and is currently on-going. In February of this year, it was agreed at Full Council that the new Local Plan would cover the period 2025-2050.

Having undertaken a launch & early engagement, we have commissioned a number of evidence base studies to support the Local Plan, including a Housing and Economic Development Needs Assessment (HEDNA), the initial findings of which suggest there will be a significant increase in the housing requirement for Central Bedfordshire.

We recently undertook a Call for Sites, which concluded in January 2025, and are now in the process of undertaking a robust site assessment process of the land submitted for our consideration. We have also commenced a review of the Central Bedfordshire and Luton Green Belt (a joint commission with Luton Council) - this study is however, still in the early stages having been delayed by the publication of the New NPPF in December 2024 and the subsequent announcement that further guidance on Green Belt and Grey Belt was to follow.

Given the likely increase in the annual housing requirement for Central Bedfordshire, and that we are yet to conclude our own site assessment process or Green Belt Review, we are unable to confirm at this stage if we will be able to meet our own identified needs and are therefore unable at this time to identify if there are any opportunities to accommodate any of the housing need identified in Greater Cambridge.

Yours sincerely,
Caroline Danby
Head of Strategic Growth

Appendix 2: Record of duty to cooperate meetings (between First Proposals 2021 Draft Plan 2025)

Neighbouring Local Planning Authorities and County Councils:

Bedford Borough Council

- 22 July 2025 (meeting also including Cambridgeshire and Peterborough Combined Authority and Cambridgeshire County Council transport officers): respective Local Plan updates; Greater Cambridge Transport Strategy, Cambourne North potential cross-boundary impacts, strategy – housing and employment.

Central Bedfordshire District Council

- 12 August 2025 (meeting also including Cambridgeshire and Peterborough Combined Authority and Cambridgeshire County Council transport officers): respective Local Plan updates; Greater Cambridge Transport Strategy, Cambourne North potential cross-boundary impacts, strategy – housing and employment.

East Cambridgeshire District Council

- 7 May 2025: respective Local Plan updates; sites with cross-boundary impacts, transport, Green Belt.

Huntingdonshire District Council

- 12 September 2024: respective Local Plan updates; strategy – housing and employment; water supply; transport; sites with cross-boundary impacts.

North Hertfordshire District Council

- 4 September 2024: respective Local Plan updates; sites with cross-boundary impacts.
- 29 April 2025: respective Local Plan updates; sites with cross-boundary impacts, Green Belt.
- 30 July 2025: respective Local Plan updates; sites with cross-boundary impacts, Green Belt.

Uttlesford District Council

- 1 October 2024: meeting regarding Uttlesford Local Plan Regulation 19 consultation.
- 10 January 2025: Uttlesford Local Plan Submission Plan and Statement of Common Ground; sites with cross-boundary impacts.
- 24 June 2025: respective Local Plan updates.

Cambridgeshire County Council

- Biweekly meeting: Local Plan transport evidence and policy, including with Cambridgeshire and Peterborough Combined Authority and Greater Cambridge Partnership.
- Biweekly meeting: Greater Cambridge Transport Strategy officer group.

Prescribed duty to cooperate bodies:

Cambridgeshire and Peterborough Combined Authority

- 2020-2023: Greater Cambridge Strategic Transport Officer Liaison Group
- Summer 2024-draft plan 2025: Biweekly meeting: Greater Cambridge Transport Strategy officer group.

Environment Agency

- 18 January 2022 (with Natural England): respective work programmes: water resources; water efficiency; flood risk evidence; biodiversity net gain, strategic green infrastructure.
- 26 August 2025: water evidence for the Local Plan.
- Monthly meetings as part of Cambridge Water Scarcity Group – see minutes: [Cambridge Water Scarcity Group - Water Resources East](#).

Highways England

- 2020-2023: 6-weekly engagement at Greater Cambridge Strategic Transport Officer Liaison Group (see section 3: Overview of Duty to Cooperate engagement).
- 14 September 2022: respective work programme updates.

- 20 November 2024: Local Plan update; Greater Cambridge Transport Strategy update.
- 20 May 2025: (meeting also including Cambridgeshire and Peterborough Combined Authority and Cambridgeshire County Council transport officers): Local Plan update; Greater Cambridge Transport Strategy update, potential Strategic Route Network impacts and proposed mitigation of strategic sites included in the emerging preferred strategy.
- 23 July 2025 (meeting also including Cambridgeshire and Peterborough Combined Authority and Cambridgeshire County Council transport officers): further discussion of Strategic Route Network impacts and proposed mitigation of strategic sites included in the emerging preferred strategy.

Historic England

- 17 January 2022: respective work programmes; site allocations and Heritage Impact Assessments, Tall Buildings and Skyline Study.
- 27 March 2024: Local Plan update; development strategy; heritage studies.

Natural Cambridgeshire (Local Nature Partnership)

- 2024-2025: attendance at Local Nature Recovery Strategy group meetings.

Natural England

- 18 January 2022 (with Environment Agency): respective work programmes: water resources; water efficiency; flood risk evidence; biodiversity net gain, strategic green infrastructure.
- 19 May 2025: Local Plan update; development strategy and site biodiversity impacts; emerging green infrastructure standards; biodiversity net gain.
- 20 May 2025: Cambourne biodiversity impacts and mitigation.