

CORE/06

Statement of Compliance with the Duty to Cooperate

Huntingdonshire Local Plan | Statement of Compliance with the Duty to Cooperate

Document Information

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1 Introduction

- 1.1** The duty to cooperate places a legal duty on local planning authorities, county councils and some public bodies to engage on strategic cross boundary matters that have a bearing on local plan preparation.
- 1.2** A local planning authority must demonstrate how it has complied with the duty at the independent examination of its local plan. An authority will need to satisfy itself particularly that cooperation has produced effective and deliverable policies on strategic cross boundary matters. ⁽¹⁾
- 1.3** The purpose of this document is to set out how these requirements and outcomes concerning the duty to cooperate have been met with regard to the preparation of the Huntingdonshire Local Plan to 2036. More specifically, the document:
- summarises how the duty to cooperate is intended to operate in practice, including the relevant legislation and guidance;
 - defines those strategic cross boundary issues that are relevant to the preparation of the local plan;
 - explains what the local planning authority has done proactively to meet the duty to cooperate on each relevant strategic issue and the policy outcomes;
 - provides details of those strategic cross boundary matters raised with the local planning authority by other bodies and organisations and the outcomes of cooperation on those matters; and
 - demonstrates how these outcomes contribute to the overall soundness of the plan (while recognising that the duty to cooperate is a separate legal requirement to the tests of soundness).

1 Planning Practice Guidance, *Duty to Cooperate*, paragraph 001.

2 The Duty to Cooperate in Practice

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2 The Duty to Cooperate in Practice

2.1 This section provides an overview of the legislative background to the duty to cooperate and related national guidance to show how it is intended to work in practice.

Statutory Requirements

2.2 The statutory provisions relating to the duty to cooperate are set out in section 110 of the Localism Act 2011. This section amends section 33 of the Planning and Compulsory Purchase Act 2004 by setting out the “*duty to cooperate in relation to planning of sustainable development*”.

2.3 The main provisions of section 110 are to require cooperation between local planning authorities, county councils and prescribed bodies or persons in the preparation of development plan documents so far as this relates to a strategic matter. The duty requires the relevant bodies to engage “*constructively, actively and on an ongoing basis*”.

2.4 “*Strategic matter*” is defined as development or land use, including for strategic infrastructure, which would have a significant impact on at least two local authorities’ administrative planning areas; or is a county matter (development involving waste disposal and related highways access).

2.5 The legislation also requires assessment of whether the local planning authority has complied with the duty to be considered as part of the independent examination of its plan. Finally, a local planning authority and other duty to cooperate bodies must have regard to any guidance given by the Secretary of State about how the duty is to be complied with.

National Guidance

2.6 The *National Planning Policy Framework* (the Framework) includes general and specific guidance with regard to the duty to cooperate. It states that, amongst other criteria, local plans should “*be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations*” (paragraph 157, third bullet).

2.7 The Framework also says that “*public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156*” (paragraph 178); that “*local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual local plans*” (paragraph 179); and that “*local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their local plans are submitted for examination*” (paragraph 181).

2.8 The *Planning Practice Guidance* (PPG) includes a section on the duty to cooperate. This reiterates the statutory requirements and elaborates on the guidance included in the Framework. The main points are:

- The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their local plans for examination (paragraph 003).
- The prescribed public bodies (see below) play a key role in delivering local aspirations and cooperation between them and local planning authorities is vital to make local plans as effective as possible on strategic cross boundary matters (paragraph 005).
- Local planning authorities must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their local plans, so long as those activities are relevant to local plan making (paragraph 006).

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- The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies (paragraph 009).
- There is no definitive list of actions that constitute effective cooperation under the duty. Cooperation should produce effective policies on cross boundary strategic matters. The duty is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone (paragraph 011).
- Authorities should submit robust evidence of the efforts they have made to cooperate on strategic cross boundary matters. This could be in the form of a statement submitted to the examination. Evidence should include details about who the authority has cooperated with, the nature and timing of cooperation and how it has influenced the local plan (paragraph 011).
- Local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages before options for the planning strategy are identified. That will help to identify and assess the implications of any strategic cross boundary issues on which they need to work together and maximise the effectiveness of local plans (paragraph 012).
- Planning for infrastructure is a key requirement of the effectiveness element of the test of local plan soundness, which requires plans to be deliverable and based on effective joint working on cross boundary strategic priorities (paragraph 013).
- Close cooperation between district local planning authorities and county councils in 2-tier areas will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education (paragraph 014).
- The local planning authorities and public bodies that a local planning authority needs to cooperate with will depend on the strategic matters that the local planning authority is planning for and the most appropriate functional geography to gather evidence and develop planning policies (paragraph 015).
- It is important to adopt a pragmatic approach in deciding the area over which cooperation is needed and who to work with (paragraph 015).

2.9 As noted in paragraph 2.7, the Framework lists strategic priorities that should be addressed through strategic policies in the local plan, to deliver:

- The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- The provision of health, security, community and cultural infrastructure and other local facilities; and
- Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape (paragraph 156).

2.10 Additional guidance on how these strategic priorities should be addressed is set out in the Framework. More specifically, guidance is included that explicitly requires joint working where these strategic priorities might have cross boundary implications, and therefore clearly requires the duty to cooperate to be enacted. The relevant guidance is (with emphasis added with regard to the cooperation required):

- Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas (paragraph 31).
- In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (paragraph 54).

2 The Duty to Cooperate in Practice

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- Local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries (paragraph 159).
 - Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market (paragraph 160).
 - Local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and take account of the need for strategic infrastructure including nationally significant infrastructure within their areas (paragraph 162).
- 2.11** In addition, the PPG requires close cooperation between district local planning authorities and county councils in 2-tier areas, which will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education (paragraph 014).
- 2.12** The prescribed bodies for the purposes of the duty to cooperate, referred to in the primary legislation, are set out in regulations ⁽²⁾. These bodies are:
- the Environment Agency;
 - the Historic Buildings and Monuments Commission for England (known as English Heritage);
 - Natural England;
 - the Mayor of London;
 - the Civil Aviation Authority;
 - the Homes and Communities Agency;
 - each Clinical Commissioning Group established under section 14D of the National Health Service Act 2006;
 - the National Health Service Commissioning Board;
 - the Office of Rail Regulation;
 - Transport for London;
 - each Integrated Transport Authority;
 - each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State where the Secretary of State is the highways authority); and
 - the Marine Management Organisation.
- 2.13** In terms of engagement with neighbouring authorities, Huntingdonshire borders seven authorities: Peterborough City Council, Fenland District Council, East Cambridgeshire District Council, South Cambridgeshire District Council, Central Bedfordshire Council, Bedford Borough Council and East Northamptonshire District Council.
- 2.14** The Secretary of State for Communities and Local Government announced the Cambridgeshire and Peterborough Combined Authority devolution deal on 16 March 2017. This gives Cambridgeshire and Peterborough new powers over transport, planning, skills, a £600 million investment fund over 30 years to grow the local economy and £170 million to deliver new affordable homes. A Mayor was elected in May 2017 to lead the new combined authority. The authority consists of 9 members: the Mayor, the seven

2 The Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013

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council leaders/representatives and the Local Enterprise Partnership representative. This arrangement ensures strategic co-operation at the highest political level locally. The Combined Authority is committed to significantly boosting housing delivery within Cambridgeshire and Peterborough and to work with Government and its agencies to unlock barriers to growth and to plan and prioritise investment in associated infrastructure.

3 The Duty to Cooperate and the Huntingdonshire Local Plan to 2036

3 The Duty to Cooperate and the Huntingdonshire Local Plan to 2036

Introduction

- 3.1** The Localism Act makes clear that local planning authorities and certain organisations should cooperate in the preparation of plans where this relates to a strategic matter. The legislation and supporting guidance issued by the Secretary of State are equally clear that a strategic matter is one involving at least two local authorities' administrative planning areas, ie it is a matter that has cross boundary implications. The Framework provides both general and specific guidance on matters that require engagement.
- 3.2** The bodies that local planning authorities are required to cooperate with on such matters are county councils and other bodies prescribed by regulations (paragraph 2.12 above). The statutory provisions and supporting guidance are, therefore, very clear on the issues that require cooperation and which organisations should be involved.
- 3.3** This provides the basis on which the duty to cooperate has been undertaken in the preparation of the Huntingdonshire Local Plan to 2036. This section addresses in more detail how this has happened and the outcomes reflected in the plan. For each of the strategic matters or priorities set out in the Framework (listed in paragraph 2.9 above), the following information is provided: the relevant section and policies of the plan are described briefly; the engagement under the duty to cooperate that has taken place; the outcomes of this engagement; and any specific issues raised by duty to cooperate bodies during the plan's preparation and how these have been addressed.
- 3.4** The majority of issues raised by the preparation of a district-level local plan will be self-contained to the area and will not, therefore, have cross boundary implications requiring cooperation. This section does, however, provide a comprehensive overview of the strategic matters that have a bearing on the plan, including those issues where the Framework specifically requires local planning authorities to engage (set out in paragraph 2.10 above).
- 3.5** Section 3 of the submission Local Plan itself sets out a number of the strategic issues that have a bearing on the district and the preparation of the plan. Those issues that relate to the duty to cooperate are also reflected in the section that follows.
- 3.6** Regular liaison on strategic planning issues occurs between Cambridgeshire and Peterborough authorities through meetings of Chief Planning Officers and the Planning Policy Forum (Local Plan managers group). To ensure that equivalent discussions are conducted with other neighbouring authorities, meetings have been held with officers from Bedford Borough, Central Bedfordshire and East Northamptonshire authorities throughout the preparation of the Local Plan.

The homes and jobs needed in the area

Planning for new homes

- 3.7** *Local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries (The Framework, paragraph 159).*
- 3.8** *In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (paragraph 54).*

- 3.9** The most significant local plan policy with regard to this strategic priority is Policy LP1, which sets out the amount of development required over the plan period, including 20,100 additional market and affordable homes. Other relevant policies with regard to new homes are LP2 *Strategy for Development*, which sets out the distribution of growth across the district and, related to this, Policy LP7 *Spatial Planning Areas*. Other policies which also have a direct bearing on housing provision are: LP25 *Affordable Housing Provision*; LP26 *Housing Mix*; LP27 *Specialist Housing*; and LP28 *Gypsies, Travellers and Travelling Showpeople*.
- 3.10** The principal issue related to the duty to cooperate is how the local planning authority has addressed the requirement of paragraph 159 of The Framework. Huntingdonshire district is within the Cambridge Sub-Region Housing Market Area (HMA), which comprises the administrative areas of seven city and district councils⁽³⁾. Consequently, there is a specific requirement for the district council to work with these other authorities to prepare a Strategic Housing Market Assessment (SHMA) to assess its and others' full housing needs.
- 3.11** The *Strategic Housing Market Assessment for the Cambridge Sub-Region* (2013) established an objectively assessed housing need (OAN) figure for the HMA as a whole and for each district within it. The OAN for Huntingdonshire from 2011 to 2036 is 21,000 additional homes out of a total of 93,000 across the HMA to 2031. The local authorities also agreed in 2013 to produce a document that would convey their agreement to the OAN figures and, where relevant, the distribution of these. This involved close working with Peterborough City Council as a directly neighbouring authority to two of the HMA authorities, including Huntingdonshire District Council.
- 3.12** The *Cambridgeshire & Peterborough Memorandum of Co-operation, Supporting the Spatial Approach 2011-2031*⁽⁴⁾ (the MoC) was published alongside the SHMA in 2013. This was developed in large part to demonstrate a coherent approach to development in the wider area and, in particular, as evidence of the authorities proactively addressing the duty to cooperate. It was produced in accordance with the guidance in paragraph 181 of the Framework.
- 3.13** The authorities in the HMA reached agreement with Peterborough City Council that it would accommodate 2,500 dwellings from the Cambridge Sub-Region HMA. This agreement is recorded in the MoC⁽⁵⁾.
- 3.14** The first local plan reviews to rely on the OAN figures from the SHMA for their housing targets were those for Fenland and East Cambridgeshire, examined in 2013 and 2014 respectively. Both plans were subsequently found sound and adopted on the basis of the agreed housing targets in the MoC.
- 3.15** The Cambridge and South Cambridgeshire Local Plans were submitted for examination in spring 2014. The hearings started later that year and finished in 2017; consultation main modifications commenced on 5th January 2018 for six weeks. Housing targets in the two plans were initially based on OAN from the SHMA and included in the MoC. However, shortly following the plans' submission the PPG was issued, including guidance on Housing and Economic Development Needs Assessments. The Inspectors examining the plans required the OAN assessment from the SHMA to be updated to take account of this latest national guidance (specifically concerning market signals and affordability) and more recent household projections.

3 Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, foest heath District Council, Huntingdonshire District Council, South Cambridgeshire District Council and St Edmundsbury Borough Council

4 This included housing figures for Huntingdonshire to 2036 in accordance with the current plan period of 2011-2036.

5 Appendix 1, paragraphs 3.4-3.8.

3 The Duty to Cooperate and the Huntingdonshire Local Plan to 2036

- 3.16** Of the remaining authorities in the HMA, Forest Heath District Council has recently had its single issue review local plan examined and is awaiting the outcome; St Edmundsbury Borough Council is preparing for a plan review; and East Cambridgeshire District Council is undertaking an early review of its plan. Fenland District Council is not undertaking a plan review at this time.
- 3.17** For the four authorities undertaking plan reviews at present, including Huntingdonshire District Council, it is not possible to rely on the OAN in the SHMA and reflected in the MoC to inform their housing targets, for two principal reasons. First, more recent national population and household projections have been issued; the PPG confirms that these should be the starting point for establishing OAN ⁽⁶⁾. Second, the PPG itself has been issued since the SHMA and MoC. As this now provides national guidance on undertaking housing needs assessments, the approach needs to be followed in any current assessment of OAN.
- 3.18** Given the very different stages of local plan reviews across the HMA, the authorities recognised that it would not be possible at present to undertake a full SHMA review. Therefore, as a pragmatic response to the current situation each of the four authorities has undertaken an OAN assessment for its area. These circumstances are recognised in the PPG, which states: *“Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so they take place at the same time”*⁽⁷⁾.
- 3.19** Building on the existing evidence base of partner local authorities in the Cambridge Sub-Region HMA, the work undertaken by the Cambridgeshire County Council Research Group to update OAN figures for the four authorities is consistent and follows closely the guidance in the PPG and technical advice in the *Objectively Assessed Need and Housing Targets* note prepared for the Planning Advisory Service by Peter Brett Associates.
- 3.20** For those authorities that have updated their OAN separately to the most recent SHMA, including Huntingdonshire District Council, there is no suggestion that they will not be able to accommodate fully their own identified need. Moreover, Peterborough City Council maintains its agreement to accommodating 2,500 homes from the Cambridge Sub-Region HMA. Consequently, the original purpose of the MoC remains intact, reflecting a key element of the duty to cooperate required by the Framework, that the local authorities in an HMA should collaborate to have a clear understanding of housing needs in their area and how these will be accommodated
- 3.21** The current position on OAN for each authority in the HMA is set out below.

Table 1 Objectively Assessed Housing Need by Local Authority

Local Authority area	OAN from 2013 SHMA (2011-2031)	Updated OAN
Cambridge	14,000	14,000
East Cambridgeshire	13,000	12,900 (2014-2036)
Fenland	12,000	No plan review
Forest Heath	7,000	6,800
Huntingdonshire	21,000 (2011-2036)	

6 Paragraph: 015 Reference ID: 2a-015-20140306

7 Paragraph: 007 Reference ID: 2a-007-20150320

Local Authority area	OAN from 2013 SHMA (2011-2031)	Updated OAN
South Cambridgeshire	19,000	19,500
St Edmundsbury	11,000	Not yet available

- 3.22** With regard to paragraph 54 of the Framework concerning planning for rural housing needs, the plan includes two specific policies that are relevant. Policy LP21 concerns *Homes for Rural Workers*, while Policy LP30 addresses *Rural Exception Housing*. While neighbouring authorities have been engaged fully during the preparation of the plan as a whole, no strategic matters with cross boundary implications have arisen in relation to this issue during the plan's preparation.
- 3.23** The District Council worked with the authorities in the Cambridge Sub-Region HMA, together with Peterborough City Council and King's Lynn and West Norfolk Borough Council, to assess the need for Gypsy and Traveller pitches and Travelling Showpeople plots. The relevant evidence that informed the local plan and specifically Policy LP28 is set out in the *Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment 2016*.

Strategic matters raised about planning for new Homes

- 3.24** Those matters raised during the plan's preparation that relate to the duty to cooperate, because they have cross boundary implications, together with the district council's response, are set out in the table below.

Table 2 Strategic matters raised about planning for new homes

Issue raised	District Council's response
Central Bedfordshire Council raised the possibility of Huntingdonshire being called on to help meet unmet housing need from Luton subject to their own capacity assessments. No similar comments were received from any other adjoining authority.	Subsequent discussions with local planning authorities in Bedfordshire have confirmed that Luton is likely to need to cascade unmet housing need to adjoining districts. However, Huntingdonshire has no geographic relationship with Luton; a review is being undertaken in Bedfordshire to assess how the anticipated level of need can be met there; and Luton Borough Council has recently adopted its Local Plan.
The North Northamptonshire Joint Planning Unit noted that Huntingdonshire was providing for its own needs.	Noted.

- 3.25** Some other neighbouring authorities made supportive representations that the duty to cooperate on this strategic priority had been undertaken effectively.

Planning for additional jobs

- 3.26** *Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market (The Framework, paragraph 160).*

3 The Duty to Cooperate and the Huntingdonshire Local Plan to 2036

- 3.27 The local plan includes an objective “to promote economic growth and resilience and diversify the range of businesses active across the district that can add greater value to the local economy”. A number of policies are designed to support and deliver these outcomes. As well as setting out the level of additional housing, Policy LP1 also states that approximately 14,400 new jobs will be provided over the plan period. Policies LP19 *Established Employment Areas* and LP20 *Rural Economy* are supportive of existing and new economic opportunities, while Policies LP22 *Town Centre Vitality and Viability* and LP24 *Tourism and Recreation* focus on specific sectors.
- 3.28 The technical basis for the 14,400 additional jobs for the area are economic forecasts undertaken for the district council by Cambridgeshire County Council’s Research Group. As with the OAN for housing, these were based on an update from technical work to support the SHMA, using the East of England Forecasting Model (EEFM) and other economic forecasts. The Research Group undertook economic forecasting work on a consistent basis for other local plan reviews within Cambridgeshire, Peterborough and for some of the neighbouring areas, particularly in Suffolk.
- 3.29 The local plan promotes a Strategic Expansion Location at Alconbury Weald, which includes an Enterprise Zone, with the objective, “to maximise the benefits for Huntingdon of Alconbury Enterprise Zone”.
- 3.30 In terms of addressing the duty to cooperate, and specifically the requirements of paragraph 160 of the Framework, the Council is working with the Greater Cambridge Greater Peterborough Local Enterprise Partnership (the LEP) to ensure the success of the 150 hectare enterprise zone at Alconbury Weald. Huntingdonshire’s Economic Growth Plan 2013-2023 was produced in accordance with the LEP’s draft growth prospectus. The Economic Growth Plan provides for new business at Alconbury Weald and inward investment which benefits from the proximity to the major knowledge and investment hub of Cambridge. The local plan includes a section on delivery which sets out how Huntingdonshire will work with partners in delivering the objectives for growth.
- 3.31 When designated in 2011 through engagement with partner authorities in Cambridgeshire and Peterborough, it was envisaged that the Enterprise Zone would accommodate around 8,000 new jobs by 2036, with an emphasis on technology and innovation, advanced manufacturing and engineering, incubator space for start-up businesses and grow-on space for small and medium-sized businesses. Alconbury’s location between Cambridge and Peterborough should help to enhance the economic linkages between the complementary business clusters in and around those two cities.
- 3.32 The Huntingdonshire Employment Land Study 2014 analyses the need for employment land in Huntingdonshire in the context of surrounding development and proposals. It involved interviews with developers and agents, a survey of businesses and consultation with major private sector employers and key public sector agencies. The study included an analysis of adjoining districts, for example noting the allocation of Great Haddon on the southern edge of Peterborough and recent planning permissions in Cambridge and South Cambridgeshire.

Strategic matters raised about planning for additional jobs

- 3.33 Those matters that relate to the duty to cooperate, because they have cross boundary implications, together with the District Council’s response, are set out in the table below.

Table 3 Strategic matters raised about planning for additional jobs

Issue raised	District council’s response
Cambridgeshire County Council noted that creation of the number of jobs envisaged in the draft Local Plan would be challenging given that national growth is likely to be slow into the 2020s. However, given the roll out of the Enterprise Zone, the County Council supported the	This continues to be the subject of ongoing discussions with the County Council and other partners. The newly-established Cambridgeshire and Peterborough Combined Authority will have an important role to play, particularly with the

Issue raised	District council's response
<p>proposals. To assist the pace of jobs growth, the Council sought measures, particularly for the strategic expansion locations, to encourage the servicing of employment sites to stimulate demand.</p>	<p>establishment of an Economic Commission for the area to support its target of significant economic growth; and its role, working with the LEP, to develop a Local Industrial Strategy for the strategic area. Huntingdonshire District Council is engaged fully as a member of the Combined Authority.</p>
<p>Peterborough City Council commented that it supported the spatial strategy in the draft local plan. It noted that Alconbury Weald is one the main areas of growth and that there may be some scope to incorporate sustainable transport links between Peterborough and Alconbury Weald.</p>	<p>The District Council will continue to engage with the City Council and other partners to promote sustainable transport options and enhancements.</p>

The provision of retail, leisure and other commercial development

- 3.34** There is one principal policy that addresses these issues within the local plan: LP22 *Town Centre Vitality and Viability*. The only issue, therefore, in regard to the duty to cooperate that is likely to have cross boundary implications is large-scale retail, leisure or commercial development.
- 3.35** The Huntingdonshire Retail, Leisure and Commercial Needs Assessment 2017 indicates how the district's town centres and growth areas will provide for the retail needs of residents in the context of existing and planned growth in the surrounding area. It is noted that the district's town centres operate at a lower level in the retail hierarchy than nearby Cambridge and Peterborough, which results in only a relatively small proportion of the comparison shopping expenditure being retained in Huntingdonshire. The Retail Study's conclusions, which have been translated into the submission local plan, do not affect that hierarchy, but do provide for some growth in comparison shopping as well as maintaining a high retention rate for convenience shopping.
- 3.36** There are, therefore, no strategic matters with cross boundary implications arising from this issue and none have been raised by the prescribed duty to cooperate bodies or neighbouring authorities.

The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)

- 3.37** *Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas (The Framework, paragraph 31).*
- 3.38** *Local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste...flood risk and coastal change management, and its ability to meet forecast demands; and take account of the need for strategic infrastructure including nationally significant infrastructure within their areas (paragraph 162).*

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- 3.39** The submission local plan (Appendix C) identifies the infrastructure projects required to support the plan, while infrastructure requirements that relate to specific allocations are identified in the relevant allocation policy. In preparing the development site allocations the District Council has worked with infrastructure providers, landowners, developers and environmental protection agencies to establish that the sites are developable within the plan period.
- 3.40** More generally, the local plan includes a range of policies that either directly or indirectly address these various infrastructure matters. These include LP4 *Contributing to Infrastructure Delivery* and, specifically for transport, Policies LP17 *Sustainable Travel* and LP18 *Parking Provision and Vehicle Movement*. With regard to water and flood risk, the following policies are included in the plan: LP5 *Flood Risk*, LP6 *Waste Water Management* and LP16 *Surface Water*. Also of relevance is Policy LP37 *Renewable and Low Carbon Energy*.
- 3.41** With regard to sources of funding for infrastructure, the Council is part of a Community Infrastructure Levy (CIL) working group, with Peterborough City Council and the other Cambridgeshire authorities, which meets quarterly to discuss topics such as CIL, viability, and planning obligations (section 106 agreements). The Council is also a member of the Bedfordshire Cross Boundary group.
- 3.42** Having regard to paragraphs 31 and 162 of the Framework, the issues that have cross boundary implications are upgrades to strategic transport infrastructure (both road and rail) and some water-related issues, due to catchment areas.
- 3.43** Strategic transport matters have a significant bearing on future development with the A14, A1 and A428 running through the district; as well as the Great Northern section of the East Coast mainline between London and Peterborough. The District Council has, therefore, had regular engagement throughout the plan's preparation with Highways England (formerly the Highways Agency) and Network Rail.
- 3.44** The Cambridge to Huntingdon A14 road scheme is intended to reduce congestion, unlock economic growth, improve local connectivity and improve safety. The scheme includes a bypass of Huntingdon, on-line improvements towards Cambridge and the widening of the Cambridge northern bypass. Following significant lobbying and funding commitments from local partners including the District Council, Government approval for the scheme has been granted, and work started in late 2016 with completion due in 2020.
- 3.45** Improvements are also planned to the A428 between the Black Cat roundabout with the A1 and the Caxton Gibbet roundabout with the A1198. The preferred route announcement has been delayed and is now expected in 2018. If consented the scheme is expected to commence in 2020 and provide additional road capacity, reduce congestion and delays and facilitate more reliable journey times.
- 3.46** A scheme to upgrade the East Coast mainline railway is in preparation which aims to reinstate the fourth track on the east side of the railway between Huntingdon station and Woodwalton. This is expected to remove a bottleneck between London and the North allowing both more and faster train journeys on the line. The promoters of the strategic development at Alconbury Weald are also working with partners to bring forward a railway station at this location as part of a much wider investment programme in the East Coast mainline, Crossrail and Thameslink.
- 3.47** Longer term proposals are being worked up for the Oxford-Milton Keynes-Cambridge corridor to promote infrastructure, housing and growth. These are likely to affect the southern part of the district, particularly St Neots. Any proposals may come forward through an integrated strategic plan and/or the next iteration of the Huntingdonshire Local Plan. The District Council both in its own right, and as part of the Cambridgeshire and Peterborough Combined Authority, will continue to cooperate and engage with Government, the National Infrastructure Commission, national agencies and neighbouring authorities as work on the strategic corridor progresses.
- 3.48** Cambridgeshire County Council is the local highway authority with whom Huntingdonshire District Council has a close relationship. Although many issues in respect of local access are not strategic, there are also issues of strategic importance such as roads which traverse boundaries. Discussions over the implications

of policies and proposals of the local plan have been ongoing throughout its preparation and specialist advice from County Highways has been incorporated in many instances. The District Council also has a continuing relationship with the County Council in respect of its public transport proposals, many of which have an impact across boundaries such as the guided busway which connects Huntingdonshire to Cambridge.

- 3.49** Turning to strategic water issues, the Huntingdonshire Stage 2 Detailed Water Cycle Study (WCS) provides information about the capacity of the water environment and water services infrastructure to accommodate required growth during the plan period. It has been prepared with the full cooperation of the Environment Agency as a duty to cooperate prescribed body and the relevant water companies. In preparing the plan, the District Council has also had full regard to relevant strategies that have a bearing on water-related matters as a strategic priority, notably the Anglian District River Basin Management Plan 2 (2015) and Cambridge Water and Anglian Water's Water Resource Management Plans.
- 3.50** The Cambridgeshire Renewables Infrastructure Framework (CRIF) is an example of the Cambridgeshire authorities working together to demonstrate the potential for renewables and the possible economic benefits of their use. The CRIF has demonstrated significant potential for renewable energy generation in Huntingdonshire, especially from biomass (including waste), wind and solar sources. Policy LP37 of the local plan responds positively to this.
- 3.51** A prioritised list of infrastructure needs arising from the development proposed in this local plan has been prepared in the Huntingdonshire Growth and Infrastructure Investment and Delivery Plan 2017 (GIIDP). The GIIDP, which will be updated regularly, also considers funding sources for this infrastructure, including the Community Infrastructure Levy (CIL) and planning obligations. The District Council is working with all the local authorities in Cambridgeshire through an Infrastructure Group to consider effective infrastructure prioritisation, funding and delivery.

Strategic Matters raised about the provision of transport and other infrastructure

- 3.52** Those matters raised during the plan's preparation that relate to the duty to cooperate, because they have cross boundary implications, together with the district council's response, are set out in the table below.

Table 4 Strategic matters raised about the provision of transport and other infrastructure

Issue raised	District Council's response
<p>Cambridgeshire County Council urged that the local plan make reference to the Cambridgeshire Local Transport Plan, the draft Cambridgeshire and Peterborough Long Term Transport Strategy, and the Market Town Transport Strategies for St Neots, St Ives, Ramsey, and Huntingdon and Godmanchester. The County Council also expressed support for close partnership working on the plan.</p>	<p>The Long Term Transport Strategy is critical to delivery of the development strategy; it was finalised in October 2014 and updated information incorporated into the draft Local Plan: Targeted Consultation, along with details of the Cambridgeshire Local Transport Plan and the Market Town Transport Strategies. These references are, therefore, fully included in the plan. Close partnership working continued through joint commissioning of the Strategic Transport Study 2017 and is ongoing.</p>
<p>Highways England highlighted that the Council should consider strategic road improvement proposals as for example set out in a number of their strategies, and asked to be kept up to date on local plan proposals for development.</p>	<p>The Council maintains awareness of strategic road improvement proposals, and continues to engage with Highways England on these. Appropriate references to relevant upgrades are included in the plan.</p>

3 The Duty to Cooperate and the Huntingdonshire Local Plan to 2036

Issue raised	District Council's response
<p>The Environment Agency requested that the Anglian River Basin Management Plan is identified fully in the plan.</p>	<p>Specific reference has been added to the plan.</p>
<p>The Marine Management Organisation suggested that the Marine and Coastal Access Act 2009 be referenced and the implications for the marine area are noted. They also identified that Huntingdonshire is part of the East Inshore Marine Plan Area and suggested reference is made to this, the Marine Policy Statement and draft East Inshore and Offshore Marine Plans.</p>	<p>These references have been incorporated within the list of plans and projects reviewed for the Sustainability Appraisal as their influence on the local plan is not considered significant enough to warrant being identified in the plan itself.</p>
<p>The Environment Agency supported enhancements since Stage 3 in relation to policies on pollution, contamination and water quality protection.</p> <p>The Agency also stated that in order for the duty to cooperate to be satisfied, they required completion of a suitable strategic flood risk assessment (SFRA) and evidence on the flood risk sequential test to support the allocation of sites. They raised in principle concerns with both the process and the merits of a number of sites in areas at risk of flooding, and where surface water management has the potential to be significantly affected.</p>	<p>A Level 1 and 2 SFRA, endorsed by the Environment Agency, was completed in June 2017 to support the local plan consultation. A sequential and exception test report was also completed to support the draft allocations within the plan.</p>

The provision of health, security, community and cultural infrastructure and other local facilities

- 3.53** *Local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for...health, social care, education (The Framework, paragraph 162).*
- 3.54** The local plan includes four policies that are directly or indirectly relevant to this strategic priority: LP23 *Local Services and Community Facilities*; LP27 *Specialist Housing*; LP29 *Community Planning Proposals*; and LP31 *Health Impact Assessments*. As with other forms of infrastructure referred to above, the infrastructure requirements that relate to specific allocations are identified in the relevant allocation policy. This includes the need for new or expanded schools where the District Council has worked proactively with the County Council as education authority to identify the need for schools provision and how this might be provided.
- 3.55** With an ageing population, health and social care are significant issues in Huntingdonshire as elsewhere. The District Council is taking a partnership approach to addressing older people's needs. Recognising the scale of the challenge of meeting the needs of older people over the next 20 years, local partners including the NHS, Cambridgeshire County Council and the District Council are working together to identify solutions.

Strategic Matters raised about the provision of social infrastructure

- 3.56** Those matters raised during the local plan's preparation that relate to the duty to cooperate, because they have cross boundary implications, together with the District Council's response, are set out in the table below.

Table 5 Strategic matters raised about the provision of social infrastructure

Issue raised	District Council's response
<p>Cambridgeshire County Council made comments on the need for play space, special schools and early years' education which may be secured by developer contributions. The gap between actual infrastructure costs and likely CIL payments was noted as a matter of particular concern to the County Council.</p>	<p>The pressure on CIL contributions is noted. However, CIL is only one possible source of funding and cannot reasonably be expected to meet all potential infrastructure costs, particularly where some aspects are to address pre-existing infrastructure deficits. Alternative infrastructure funding sources will continue to be pursued. This is an ongoing issue which is addressed by continuous engagement with the County Council.</p>

Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape

- 3.57** The local plan includes a strategic policy, LP3 *Green Infrastructure*, which reflects the importance of green infrastructure in addressing the effects of climate change, as wildlife habitat and for its recreational value. The Framework requires local authorities to set out a strategic approach for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Policy LP3, supported by LP32 *Biodiversity and Geodiversity*, sets out that strategic approach. Other policies relevant to this priority issue are: LP33 *Trees, Woodland, Hedges and Hedgerows* and LP36 *Heritage Assets and their Settings*.
- 3.58** The Cambridgeshire Green Infrastructure Strategy 2011 forms the evidence base for the approach to strategic scale green infrastructure. This is a partnership strategy prepared by the local authorities working with Natural England and other local partners, which is designed to assist in shaping and coordinating the delivery of green infrastructure in the county, to provide social, environmental and economic benefits now and in the future. A high level review of the green infrastructure strategy is currently being led by the Local Nature Partnership; the District Council is engaged with other partners on this project.
- 3.59** The Great Fen wetland restoration project is a good example of a strategic project developed through partnership that supports the aims of the Cambridgeshire Green Infrastructure Strategy. Located in the north of the district, the project aims to restore more than 3,700 hectares of fenland habitat connecting Woodwalton Fen and Holme Fen National Nature Reserves. It has strategic cross border implications in terms of its wider benefits related to climate change and the enhancement of the natural environment.

Strategic matters raised about the environment

- 3.60** Those matters raised during the plan's preparation that relate to the duty to cooperate, because they have cross boundary implications, together with the District Council's response, are set out in the table below.

Table 6 Strategic matters raised about the environment

Issue raised	District Council's response
<p>The North Northamptonshire Joint Planning Unit observed that the draft local plan reflected cooperation, for example in respect of strategic green infrastructure projects They noted that ongoing dialogue would be useful following an earlier meeting at their offices in 2013.</p>	<p>The Nene Valley nature improvement area was added to LP3 Green Infrastructure and identified on the key diagram. Discussions have continued in the manner envisaged.</p>

3 The Duty to Cooperate and the Huntingdonshire Local Plan to 2036

Issue raised	District Council's response
<p>Bedford Borough Council noted the reference in the draft local plan to the relationship between St Neots and development south of the A428 in Bedford Borough and green infrastructure corridors traversing the boundary. The Borough Council stated that they were happy with these.</p>	<p>Noted.</p>
<p>The Environment Agency commented on the scope to include climate change criteria in most policies in the plan. It was suggested that a section on climate change be added to the spatial portrait.</p>	<p>Additional climate change criteria have been included in the proposed submission local plan and adaption to it is also included in the spatial vision. The format of the spatial portrait has been substantially revised since the comment was made at Stage 3; climate change is now highlighted in the 'Key planning issues' section.</p>
<p>Natural England welcomed the text in the draft local plan relating to environmental issues and green infrastructure. They sought specific reference to the European sites within the district.</p>	<p>These references have now been included in the proposed submission local plan in the revised text following the green infrastructure policy.</p>
<p>Natural England also made reference to the need for a Habitats Regulations Assessment (HRA) of the plan. They commented that a screening report could be prepared for the draft local plan prior to the final HRA for the proposed submission local plan</p>	<p>An HRA has now been undertaken and the local plan has been screened to consider the likely effects of all the policies cumulatively and of any individual policy on designated European sites in the district.</p>

4 Conclusion

- 4.1** This statement has been prepared to meet the guidance in the PPG (paragraph 011) that authorities should submit robust evidence of the efforts they have made to cooperate on strategic cross boundary matters. This could be in the form of a statement submitted to the examination. Evidence should include details about who the authority has cooperated with, the nature and timing of cooperation and how it has influenced the local plan.
- 4.2** The principal strategic matters with cross boundary implications arising from the strategic priorities set out in the Framework, and addressed in this statement, are:
- the number of additional homes and jobs to be accommodated in the district as part of a wider strategic assessment of housing and economic needs, and how these will be distributed;
 - the establishment of the Enterprise Zone as part of the Alconbury Weald strategic development location;
 - strategic road and rail infrastructure upgrades;
 - water related issues where these have a bearing on wider catchment areas and strategic water management plans; and
 - strategic scale green infrastructure.
- 4.3** This statement demonstrates for each of these matters how the District Council has cooperated effectively with relevant prescribed bodies, neighbouring authorities and Cambridgeshire County Council in developing relevant evidence and plan policies. It has also set out where further, ongoing cooperation will occur on strategic matters; for example, with regard to the Oxford-Milton Keynes-Cambridge strategic corridor. Furthermore, the District Council engages cooperatively in monitoring the outcomes and effectiveness of its local plan policies.
- 4.4** While not a soundness test itself, this effective and proactive cooperation in preparation of the local plan supports its soundness by demonstrating in this regard that it is positively prepared, justified, effective and consistent with national policy.