

# East Cambridgeshire District Council

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## NOTICE OF MEETING

**NOTICE IS HEREBY GIVEN** that an Extraordinary Meeting of the **EAST CAMBRIDGESHIRE DISTRICT COUNCIL** will be held on **THURSDAY 20 MARCH 2025** in the **COUNCIL CHAMBER** at **THE GRANGE, NUTHOLT LANE, ELY, CB7 4EE**, commencing at **6:00pm** with up to 15 minutes of Public Question Time, immediately followed by the formal business, and you are summoned to attend for the transaction of the following business

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## AGENDA

- 1. PUBLIC QUESTION TIME** **[oral]**  
The meeting will commence with up to 15 minutes Public Question Time (PQT) – questions/statements can be submitted in advance or placed in the PQT box in the Council Chamber prior to the commencement of the meeting – see Notes below for further information on the PQT scheme.
- 2. APOLOGIES FOR ABSENCE** **[oral]**
- 3. DECLARATIONS OF INTEREST** **[oral]**  
To receive declarations of interest from Members for any items on the Agenda in accordance with the Members Code of Conduct.
- 4. CHAIR'S ANNOUNCEMENTS** **[oral]**
- 5. THE MAKING OF THE MODIFIED WITCHFORD NEIGHBOURHOOD PLAN** **Page 3**
- 6. LOCAL GOVERNMENT REORGANISATION – SUBMISSION TO GOVERNMENT** **Page 19**

**J Hill**  
**Chief Executive**

To: All Members of the Council

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**NOTES:**

Members of the public are welcome to attend this meeting. Admittance is on a "first come, first served" basis and public access will be from 30 minutes before the start time of the meeting. Due to room capacity restrictions, members of the public are asked, where possible, to notify Democratic Services ([democratic.services@eastcambs.gov.uk](mailto:democratic.services@eastcambs.gov.uk) or 01353 665555) of their intention to attend a meeting.

The meeting will be webcast and a live stream of the meeting will be available. Further details can be found at <https://eastcambs.gov.uk/node/2736> Please be aware that all attendees, including those in the public gallery, will be visible on the livestream.

Public Questions/Statements are welcomed on any topic related to the Council's functions as long as there is no suspicion that it is improper (e.g. offensive, slanderous or might lead to disclosures of Exempt or Confidential information). Up to 15 minutes is allocated for this at the start of the meeting. Further details about the Public Question Time scheme are available at: <https://www.eastcambs.gov.uk/committees/public-question-time-scheme>

The Council has adopted a 'Purge on Plastics' strategy and is working towards the removal of all consumer single-use plastics in our workplace. Therefore, we do not provide disposable cups at our meetings and would ask members of the public to bring their own drink to the meeting, if required.

Fire instructions for meeting: The instructions in the event of a fire at the venue will be announced at the commencement of the meeting.

Reports are attached for each agenda item unless marked "oral".

If required, all items on the agenda can be provided in different formats (e.g. large type, Braille or audio tape, or translated into other languages), on request, by calling Main Reception on (01353) 665555 or e-mail: [translate@eastcambs.gov.uk](mailto:translate@eastcambs.gov.uk)

If the Committee wishes to exclude the public and press from the meeting, a resolution in the following terms will need to be passed:

"That the press and public be excluded during the consideration of the remaining item no(s). X because it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during the item(s) there would be disclosure to them of exempt information of Category X of Part I Schedule 12A to the Local Government Act 1972 (as amended)."

**TITLE: The making of the Modified Witchford Neighbourhood Plan**

Committee: Special Council

Date: 20 March 2025

Author: Strategic Planning and Development Control Manager

Report number: Z143

Contact officer: David Morren

[david.morren@eastcambbs.gov.uk](mailto:david.morren@eastcambbs.gov.uk), 01353 665555, The Grange, Ely

## **1.0 Issue**

- 1.1. Witchford Neighbourhood Area, which matches the Witchford parish area, already has a made Neighbourhood Plan adopted by Full Council on 21 May 2020.
- 1.2. However, Witchford Parish Council has decided it would like the existing plan to be modified, so that it introduces a new chapter relating to climate change. Having passed all the necessary stages to prepare a modified plan, Full Council has to decide whether to formally make the modified plan part of the Development Plan for East Cambridgeshire (alongside the 2015 Local Plan (as amended 2023) and other made Neighbourhood Plans).

## **2.0 Recommendations**

- 2.1. That Council:
  - (i) congratulates Witchford Parish Council on their preparation of a successful modification of their Neighbourhood Plan; and
  - (ii) formally makes the Witchford Neighbourhood Plan (as modified 2025) (attached at Appendix 1) part of the Development Plan for East Cambridgeshire with immediate effect.

## **3.0 Background/Options**

- 3.1. Witchford Parish Council successfully prepared a Neighbourhood Plan, culminating in its adoption in May 2020. Whilst there is no legal requirement to update or review any such plan, the Parish Council recently decided to do.
- 3.2. When updating an already existing neighbourhood plan, a parish council can choose to prepare either:
  - (a) a full new neighbourhood plan, to replace the existing one (this is what Sutton recently successfully did); or
  - (b) a modification to their existing plan, with unaltered parts carrying forward.
- 3.3. The parish council decided option (b) was their preference, which was sensible in this case because the parish council did not want to change what was in the existing plan, but instead to simply add new content. This new content is formally described as a 'modification' of the existing plan, and it is the modification aspects which are consulted upon and tested.

- 3.4. The process of consultation and examination is similar to the preparation of a full neighbourhood plan, albeit the scale of examination does vary considerably depending on the scale of modifications proposed. For this plan, the modifications were neatly packaged in a new chapter, comprising five new policies relating to climate change and the natural environment.
- 3.5. After due consultation, an independent Examiner (David Kaiserman BA DipTP MRTPI) then reviewed the modified plan and published an Examiner's Report (attached at Appendix 2).
- 3.6. Aside from several relatively minor adjustments, the Examiner was satisfied the modified plan passed all necessary tests and has recommended it be made part of the development plan for the area.
- 3.7. One interesting aspect of a modification plan is whether or not the modifications require a referendum. For a full plan (new or replacement), a referendum is always required. For a modification plan, the Examiner has to decide whether a referendum is necessary. In this case, for reasons set out in his report, he has decided it is not necessary. Whilst during the examination stage, ECDC's representation stated that a referendum was "likely necessary" (due to the scale of policies being introduced), the Examiner disagrees. His reasoning in this regard is considered sound. In any event, the decision whether a referendum is necessary or not rests with the Examiner, not ECDC (unless we believe such a decision is fundamentally flawed, which in this case it is not considered to be so).
- 3.8. As no referendum is needed, this obviously speeds up the process to adoption (or making of the plan). The legislation (s18A of The Neighbourhood Planning (General) Regulations 2012) requires ECDC to make the plan part of the development plan (unless it has good reason not to) within 5 weeks of receiving the Examiner's Report "or such later date as may be agreed in writing by the local planning authority and the qualifying body."
- 3.9. We received the Examiner's Report on 6 March 2025, therefore meaning the five-week rule ends on 11 April 2025. This Full Council meeting therefore is timely.
- 3.10. Full Council's options are somewhat limited and are set out in s14 of Schedule A2 of the Planning and Compulsory Purchase Act 2004. In essence, Full Council must approve the modifications and make the modified plan part of the development plan for the area, and can only refuse to do so if, by doing so, it "would breach, or would otherwise be incompatible with, any assimilated obligation or any of the Convention rights". No such known breach exists, and none have been brought to our attention.
- 3.11. The submitted plan has therefore been adjusted to meet the Examiner's requests and is attached at Appendix 1. Unless Full Council can identify a breach of any obligation or Convention right, then it should make the Witchford Neighbourhood Plan (as modified 2025) part of the development plan for the area.

## **4.0 Arguments/Conclusions**

- 4.1. A duly prepared modified Witchford Neighbourhood Plan has been consulted upon and examined, with an Examiner concluding the modified plan should be approved and made part of the development plan for the area.

- 4.2. As there is no known breach of any legal requirement, Full Council is obliged to make the modified plan part of the development plan for the area. In doing so, we should congratulate Witchford Parish Council's efforts, and their success at being the first parish in the district to successfully modify their plan.

## 5.0 Additional Implications Assessment

- 5.1 In the table below, please put Yes or No in each box:

<b>Financial Implications</b>  <b>No</b>	<b>Legal Implications</b>  <b>Yes</b>	<b>Human Resources (HR) Implications</b>  <b>No</b>
<b>Equality Impact Assessment (EIA)</b>  <b>No</b>	<b>Carbon Impact Assessment (CIA)</b>  <b>No</b>	<b>Data Protection Impact Assessment (DPIA)</b>  <b>No</b>

### Legal implications

- 5.2. ECDC is duty bound (s18A of the Neighbourhood Planning (General) Regulations 2012) to determine whether to make a Neighbourhood Plan part of the development plan for its area within 5 weeks of receiving a positive Examiner's Report. This means the council must make a decision no later than 11 April 2025, unless a delay can be agreed with the parish council.
- 5.3. Once made by Full Council, the plan achieves the statutory status of forming part of the development plan for the area. The council, in its capacity as local planning authority, will be duty bound to use the plan to help it determine planning applications and do so in accordance with various town and country planning acts.

### Equality Impact Assessments and Carbon Impact Assessments

- 5.4. Whilst EIA and CIA assessments are listed as 'no' in the above table for the purpose of this report, Members should note that a wide range of equality and sustainability implications are required by legislation to be considered by the parish council, the district council and the examiner throughout the preparation of the modified plan and must pass the various statutory tests accordingly. As such, these two elements have been thoroughly tested and independently examined throughout the process. Consequently, separate such EIA and CIA are not required at this committee stage of the process.

## 6.0 Appendices

Appendix 1: Witchford Neighbourhood Plan (as modified 2025)  
Appendix 2: Examiner's Report

## 7.0 Background documents

None



Witchford Neighbourhood Plan 2019-2031 as modified March 2025

Please see separate online paper – Appendix 1





# **Witchford Neighbourhood Plan 2019-2031**

## **Climate Change Single-Issue Review**

**A report to East Cambridgeshire District Council**

**David Kaiserman BA DipTP MRTPI  
Independent Examiner**

**March 2025**

**Penny O'Shea Consulting**



## Executive summary

I was appointed by East Cambridgeshire District Council (ECDC) on 6 February 2025 with the agreement of Witchford Parish Council, to carry out the independent examination of a proposal to modify the Witchford Neighbourhood Plan 2019-2031 (WNP).

ECDC and the Parish Council are in agreement that these changes would be “material” in terms of the legislation, and therefore that they should be subject to independent examination. The Parish Council, as the qualifying body, does not believe that they would be so significant or substantial as to change the nature of the Plan such that a referendum would be necessary; ECDC, on the other hand, is of the view that the policies would change the way planning applications in the Parish would be considered, and has therefore concluded that a referendum is likely to be necessary. For reasons which are set out below, I have recommended that no referendum would be needed in this case.

Subject to a number of recommendations for alterations to the text, I have concluded that the Witchford Neighbourhood Plan, modified as proposed, meets all the necessary legal requirements and that it can be made without a referendum.

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## Introduction and procedural matters

1. The Witchford Neighbourhood Plan (WNP) was made (ie formally adopted) by East Cambridgeshire District Council on 21 May 2020, since which time it has been a part of the statutory development plan for the area. Modifications of neighbourhood plans are provided for in the legislation, and the Parish Council now wishes to add a further section with five new policies to the WNP; these being solely designed to strengthen its response to the challenges of climate change. The proposed modifications do not involve any alteration to the WNP's existing policies, which are therefore not subject to examination. The title given to the proposed modification is the Climate Change Single Issue Review (CCSIR).
2. I am independent of the Parish Council and do not have any interest in any land that may be affected by the Plan. I have the necessary qualifications and experience to carry out the examination, having had 30 years' experience as a local authority planner (including as Acting Director of Planning and Environmental Health for the City of Manchester), followed by over 20 years' experience providing training in planning to both elected representatives and officers, for most of that time also working as a Planning Inspector. My appointment has been facilitated by the Independent Examination Service provided by Penny O'Shea Consulting.
3. Planning Practice Guidance<sup>1</sup> explains that there are three types of modification which can be made to a neighbourhood plan:
  - minor modifications which would not materially affect the policies in the plan and which would not require independent examination or a referendum;
  - material modifications which do not change the nature of the plan and would require examination, but not (unlike the original plan) a referendum; and
  - material modifications which change the nature of the plan which would require both examination and a referendum.
4. The Parish Council (WPC) considers that the proposed changes, while "material", fall within the second of these categories, their reasons being set out in a statement published under Regulation 15(1)(f) of the Neighbourhood Planning (General) Regulations 2012. ECDC agrees that the modifications are material but considers that they would change the nature of the Plan, and that a referendum would likely be necessary because the new policies would alter the way planning applications within the Parish would need to be determined. My own conclusion on this procedural point is found towards the end of this report.
5. There is no general requirement to review or update a neighbourhood plan<sup>2</sup>. It is therefore important to note that, while I have broadly familiarised myself with the content of the existing version of the WNP, I have restricted my examination to the proposed changes to it. These are found in the introductory chapters (including a new objective, namely, to actively identify and promote climate change mitigation and resilience measures); and in five additional planning policies (numbered WNP CC1-CC5). Amplification of the background to these changes is found in a new section 5.11 entitled "Addressing the Climate Change Emergency in Witchford".

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<sup>1</sup> PPG Reference ID: 41-106-20190509

<sup>2</sup> PPG Reference ID: 41-084-20190509

6. In carrying out my assessment, I have had regard to relevant elements of the following principal documents:
- the existing (made) WNP 2019-2931<sup>3</sup>
  - the Basic Conditions Statement relating to the proposed CCSIR (October 2024)
  - Witchford NP Landscape Appraisal Final Report 2018
  - the representations made to the proposed modification to the WNP under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012
  - the Statement by the Parish Council made under Regulation 15(1f) of the Neighbourhood Planning Regulations 2012
  - any relevant policies of the adopted East Cambridgeshire Local Plan 2015 (as amended 2023), together with related Supplementary Planning Documents as necessary
  - relevant paragraphs of the National Planning Policy Framework (December 2024)
  - relevant paragraphs of the Planning Practice Guidance (March 2014 and updates).
7. The general rule is that neighbourhood plan examinations, including those relating to modifications, should be carried out on the basis of written representations only. Having considered all the information before me, I have been satisfied that the proposed modification to the WNP could be examined without the need for a public hearing (and it should be noted that there were no representations to the contrary). Given the nature and scope of the examination, I did not consider it necessary to visit the neighbourhood plan area.

### **The Parish of Witchford and the existing Plan**

8. The Plan relates to the mainly rural Parish of Witchford, which lies within a typical Fenland landscape about three miles south-west of Ely. The village has experienced considerable growth in recent years, and this has had what the existing Plan describes as both positive and negative impacts. The population in 2015 is given as 2360, and the Plan suggests that the Parish is still facing “massive unexpected and unplanned change”.
9. The made version of the WNP contains policies governing the spatial strategy for the Parish and policies relating to green assets; housing (including specific allocations for a total of some 330 dwellings); infrastructure; traffic; connectivity; and the local economy. The five new policies as proposed deal with various aspects of how Witchford might respond to the effects of climate change, and it is these (together with any explanatory material, as necessary) which are the focus of this examination.

### **The Basic Conditions and the Basic Conditions Statement**

10. I am not required to come to a view about the soundness of the plan as it would be modified; instead, I must principally address whether or not it is appropriate to make it, having regard to certain basic conditions, as listed at paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004. I must also be satisfied that it is generally legally compliant. Recommendations may be made concerning changes both to policies and any supporting text.

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<sup>3</sup> Incorporated within the submitted CCSIR

To this extent, the provisions are the same as those governing the examination of the original Plan. The modified WNP must:

- have regard to national policy and guidance (Condition a);
- contribute to the achievement of sustainable development (Condition b);
- be in general conformity with the strategic policies in the development plan for the local area (Condition c);
- not breach, and otherwise be compatible with, EU obligations, including human rights requirements (Condition d);
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017; and
- comply with any other prescribed matters.

11. The Basic Conditions Statement is dated October 2024. Tables 3 and 7 are designed to show how each policy of the CCSIR relates to relevant paragraphs of the NPPF and policies of the East Cambridgeshire Local Plan (ECLP), respectively. A similar tabular approach is taken to sustainable development goals. As far as the Local Plan is concerned, the conclusion in each case is that the five new policies would have the effect of complementing, in particular, policies ENV4, ENV6, ENV7 and ENV9 by adding more local detail or providing a necessary update. Where necessary, I comment below on the extent to which I consider this has been achieved in practice.

### **Other statutory requirements**

12. A number of other statutory requirements apply to the preparation of neighbourhood plans, all of which I consider have been met in this case. These are:

- that the Parish Council is the appropriate qualifying body (Localism Act 2011) able to lead preparation and modification of a neighbourhood plan;
- that what has been prepared is a modification to a Neighbourhood Development Plan, as formally defined by the Localism Act (it remains the case that the plan area does not relate to more than one Neighbourhood Area and that there are no other neighbourhood plans in place within the area covered by the plan);
- that the plan period must be stated (which in the case of the WNP remains 2019-2031); and
- that no “excluded development” is involved (this primarily relates to development involving minerals and waste and nationally significant infrastructure projects).

### **National policy**

13. National policy is set out primarily in the National Planning Policy Framework (NPPF), a key theme being the need to achieve sustainable development. The NPPF is supported by Planning Practice Guidance (PPG), an online resource which is continually updated by Government. I have borne particularly in mind the advice in paragraph 041 of the PPG that a policy in a neighbourhood plan should be clear and unambiguous, concise, precise and

supported by appropriate evidence. In addition, I have had regard, where appropriate, to the requirement set out in the NPPF itself, at paragraph 16f), that “plans should ... serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area” [for example, those already in place in the relevant local plan].

14. I note here that the Basic Conditions Statement was prepared in the context of the version of the NPPF published in December 2023, whereas the current iteration dates from December 2024. Other than the fact that paragraph numbers have in some cases changed, I am not aware of any substantive issues for the WNP deriving from the NPPF update. ***I nevertheless recommend that the opportunity be taken to either modify the BCS to take account of the new references, or to publish an annexe to deal with the same point.***

### **The existing development plan for the area**

15. The principal element of the statutory development plan for the area is the East Cambridgeshire Local Plan (ECLP) 2015 (as amended in 2023 in respect of the strategic housing policy GROWTH 1). Alongside the Local Plan, ECDC has adopted a number of Supplementary Planning Documents which have relevance for the CCSIR. I am satisfied that the Plan as it is proposed to be modified would have no implications for the other main element of the development plan, the Cambridgeshire and Peterborough Minerals and Waste Local Plan.

### **Representations received (Regulation 16)**

16. The need for, and general background to, the proposed modifications is set out in the Regulation 15 Statement (undated). The draft modified Plan was subject to public consultation between 27 November 2024 and 14 January 2025, and this resulted in a total of eight representations, all of which were from the statutory consultees (including ECDC). I will refer to any substantive points under each of the policies, set out below.

### **The Policies - introduction**

17. The made Plan includes seven objectives to support the overriding vision for the Parish, which is “to value and protect the rural character and community spirit of Witchford, ensuring that future development meets local needs”. The CCSIR proposes a small addition to this, namely “... ensuring that future development is sustainable and meets local needs”.
18. No changes are proposed to any of the existing objectives, but a new one is put forward: to “actively identify and promote climate change mitigation and resilience measures”. To give effect to this, a new chapter 5.11 includes five new planning policies, supported by appropriate contextual material in the Plan’s introduction and in the section on Key Issues. The intention is to highlight local measures which can be taken to manage and reduce greenhouse gas emissions; to improve the Parish’s resilience to climate change; and to assist the recovery of local nature assets. These represent additions to policies within the existing Plan designed to have similar objectives.
19. Policies are distinguished from supporting text by being placed within a shaded box. Each is followed by a comprehensive section providing context and reasoned justification. In the following assessments I have not thought it necessary to describe in any great detail the scope or content of either the policies or related supporting material.

### **Policy WNP CC1: Delivering sustainable buildings**

20. In the interests of brevity, I have edited the title of this policy, which in full reads: “Delivering sustainable buildings fit for a net zero carbon future which are resilient to the effects of climate change” and ***recommend that this shorter version be adopted in the final version of the Plan<sup>4</sup>.***
21. The policy requires development to be designed in such a way that it is compatible with a net zero carbon future. It sets out a number of “design expectations”, listed in order of priority and generally based on what is considered to be best practice in this field. A particular requirement is the submission of a sustainability statement which is intended to demonstrate how specific aspects of sustainable construction would be achieved.
22. ECDC notes with approval the fact that the policy contains no absolute requirements, and I agree with their appraisal. What is being set out here is an expectation of how more sustainability can be achieved in a practicable manner. To reinforce this, however, ***I recommend that the opening line of the policy by slightly amended to read: “As appropriate to its scale and site, new development must be designed.....”***
23. Anglian Water welcome the policy’s encouragement for the more efficient and sustainable use of water but ask for it to include a target standard of 100 litres per person per day (which I take to relate to residential schemes), which is a little more ambitious than the current optional national figure. I have decided not to make a recommendation for any change to the wording of the policy since there are no implications for the basic conditions.

### **Policy WNP CC2: Protecting and enhancing ecological assets**

24. The title of this policy as it stands reads “Protecting existing habitats in Witchford and seeking opportunities to strengthen parish-wide ecological networks”. As with Policy CC1, I have suggested a more concise wording and ***recommend that this shorter version be adopted in the final version of the Plan.***
25. The policy introduces additional detail to Policies WNP G13 and Local Plan Policy ENV7, by identifying parish-level information about sites of biodiversity value. It is accompanied by a new Map 15 and Appendix 4.
26. Anglian Water have pointed out that a number of the networks shown on Map 15 include part of their important water supply and wastewater infrastructure, and they are concerned that the policy might introduce “an unnecessary policy burden”. They therefore object to the inclusion of these areas unless the matter can be clarified. However, it is not clear to me that, simply by identifying specific sites, the policy would add any constraints in relation to safeguarding critical infrastructure to what already exists under Policies WNP G13 and LP ENV7. I have therefore concluded that no recommendation is needed on the point.

### **Policy WNP CC3: Delivering biodiversity net gain**

27. This policy notes the national mandatory minimum for qualifying development to achieve a 10% biodiversity net gain but encourages a 20% target for Witchford. A range of other initiatives are also suggested, including some applying to those proposals which are exempt from the statutory requirement. While this approach represents more of an aspiration than a

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<sup>4</sup> It will be noted that I have used the shorter version in the list of contents, as I have with Policy WNP CC2.

policy requirement, I see no strong reason to make any recommendation for changing it.

#### **Policy WNP CC4: Trees, woodland and carbon sequestration implications of proposals**

28. Policy WNP CC4 is a comprehensive list of measures designed to ensure the maintenance and improvement of existing trees and woodland, and includes encouragement for new planting where appropriate. The explanation of the policy intent is that it “introduces a Witchford specific planning policy” based on Policy SPD.NE8 of ECDC’s Natural Environment Supplementary Planning Document, which deals with trees and woodland, and which itself builds upon elements of Local Plan Policy ENV7. However, other than a brief reference to areas of peatland located in the north of the Parish where tree planting would not be appropriate, there is little here which, in development management terms, adds to what already exists in the planning framework for the area, and for that reason it seems to me largely redundant.
29. I have nevertheless decided not to recommend its deletion on those grounds; but for clarity, ***I recommend that a note be added to the supporting material drawing attention to those specific aspects of the policy which are additional to the ground already covered in the SPD, and therefore which should be read in conjunction with it.***
30. A separate paragraph of the policy is under the heading “Carbon sequestration implications of proposals”. It begins by stating that “The net increase or decrease in tree cover as a consequence of a development will be a material consideration in the decision-making process in terms of the carbon sequestration consequences of the proposal”. On the face of it, this could be seen as the Plan attempting to make a general legal point about materiality; though I am sure this was not the intention.
31. More broadly, however, I consider that the policy could be expressed more simply to aid understanding. ***I recommend that the paragraph be replaced with the following: “Proposals which result in a significant increase in tree cover (and hence make a positive contribution to carbon sequestration) will be strongly supported in principle. Conversely, and depending on the scale of any harm, schemes involving the loss of tree cover (and hence making a negative contribution to carbon sequestration) will not be supported in principle.”***

#### **Policy WNP CC5: Supporting renewable energy infrastructure**

32. This policy supports the principle of the creation of renewable energy infrastructure, subject to a number of criteria (which vary according to the nature and scale of the proposal). Separate elements of the policy encourage (but, properly, do not require) the establishment of some kind of local benefit fund in connection with commercial-scale schemes; and also include specific safeguards for the “Swan and Goose” Impact Risk Zone, which includes the northern part of the Parish.
33. As with the previous policy, there is some duplication with the Local Plan and a Supplementary Planning Document - in this case Policy ENV6 and the Renewable Energy (Commercial Scale) SPD. ***I therefore recommend that a note be added to the supporting material, as I have recommended in relation to Policy WNP CC4.***
34. In relation to this point, I agree with the comment by Historic England about the use of the phrase “very significant weight” when dealing with the case for domestic and business-use scale renewable energy projects (given that the term adopted by the NPPF is simply “significant weight”). I also agree that the reference to “visual” harm in relation to the impact of domestic scale renewable energy infrastructure is too narrow.



35. *I therefore recommend that the second paragraph of the policy be modified to read: “Where a household is required to gain planning permission prior to installation of a domestic scale wind turbine, solar panel or low carbon energy infrastructure, the presumption is in favour of such proposals unless harm deriving from consideration of other relevant development plan policies clearly outweighs the scheme’s benefits in terms of renewable energy”. I also recommend that the word “very” be deleted from the third paragraph of the policy (very significant weight).*
36. Historic England suggest that reference should be made in the supporting material to their Advice Note 18: *Adapting Historic Buildings for Energy and Carbon Efficiency*. This is not an issue for the basic conditions, but it would not seem out of place in the way the CCSIR has been approached, and I am content that a decision about its inclusion should be a matter for the Parish Council’s discretion.

### **Other matters**

37. Cambridgeshire County Council, as the Lead Local Flood Authority, asks for a policy to be included in the Plan dealing with the way development responds to flood risks in the Parish. In doing so, CCC refer to the adopted Cambridge Flood and Water Supplementary Planning Document, as well as other sources of advice. This response does not raise any issue in terms of the basic conditions, and I have concluded that no recommendation from me is necessary.

### **Conclusions on the Basic Conditions**

38. I am satisfied that the Witchford Neighbourhood Plan, as it is proposed to be modified by the alterations described above, continues to make appropriate provision for sustainable development. I conclude that in this and in all other material respects, subject to my recommendations, it has appropriate regard to national policy and guidance. I also conclude that the modified Plan would remain in general conformity with the strategic policies in the development plan for the local area. There is no evidence before me to suggest that it is not compatible with EU obligations, including human rights requirements.
39. As explained above, the Parish Council and ECDC differ as to the need for a referendum. In my opinion, if they became part of the development plan, the new policies would not result in any significant change to the way planning applications would be decided. In coming to this view, I have given weight to the scope and detailed content of existing policies in the Local Plan, other elements of the neighbourhood plan itself, ECDC’s Supplementary Planning Documents and the NPPF, all of which would continue to have relevance in appropriate cases. It is also clear from the scale and nature of the representations to the proposed modifications that they have resulted in no controversy locally, such that a referendum would be thought desirable.

### **Formal recommendation**

40. I have concluded that, provided that the recommendations set out above are followed, the Witchford Neighbourhood Plan would continue to meet the basic conditions if it were revised as suggested, and that the Local Planning Authority should make the draft Plan with the modifications proposed and without the need for a referendum.

David Kaiserman

David Kaiserman BA DipTP MRTPI, Independent Examiner  
6 March 2025

## Appendix 1 – Summary table of recommendations

Examiner's report paragraph	NP reference	Recommendation
14	Basic Conditions Statement	<ul style="list-style-type: none"> <li>• Either modify the BCS to take account of the new references in the December 2024 NPPF or publish an annexe to it.</li> </ul>
20	Policy WNP CC1	<ul style="list-style-type: none"> <li>• Shorten the title of the policy as suggested.</li> </ul>
22	Policy WNP CC1	<ul style="list-style-type: none"> <li>• Amend the opening line of the policy as suggested.</li> </ul>
24	Policy WNP CC2	<ul style="list-style-type: none"> <li>• Shorten the title of the policy as suggested.</li> </ul>
29	Policy WNP CC4	<ul style="list-style-type: none"> <li>• Add a note to the supporting material drawing attention to those specific aspects of the policy which are additional to the ground already covered in the SPD.</li> </ul>
31	Policy WNP CC4	<ul style="list-style-type: none"> <li>• Replace the final paragraph of the policy which relates to carbon sequestration as suggested.</li> </ul>
33	Policy WNP CC5	<ul style="list-style-type: none"> <li>• Add a note to the supporting material drawing attention to those specific aspects of the policy which are additional to the ground already covered in the SPD.</li> </ul>
35	Policy WNP CC5	<ul style="list-style-type: none"> <li>• Modify the second paragraph of the policy as suggested</li> <li>• Delete the word 'very' from the third paragraph of the policy.</li> </ul>

**TITLE: Local Government Reorganisation – Submission to Government**

Committee: Extraordinary Council

Date: 20 March 2025

Author: Director Operations

Report number: Z154

Contact officer: Isabel Edgar, Director Operations, [Isabel.edgar@eastcamb.gov.uk](mailto:Isabel.edgar@eastcamb.gov.uk)

**1.0 Issue**

- 1.1. To update the Council on Local Government Reorganisation (LGR) proposals and next steps.

**2.0 Recommendations**

Members are requested

- 2.1. To note the progress of LGR in Cambridgeshire and Peterborough.
- 2.2. To delegate authority to the Chief Executive, in consultation with the Leader of the Council, to finalise the proposed letter as set out in Appendix 1 along with other Council Leaders, as our interim submission to Government by 21 March 2025.

**3.0 Background/Options**

- 3.1. On 16 December 2024, The White Paper on English Devolution was published, which proposes wide ranging changes to the framework of local government across England including devolution from central government to strategic authorities and local government reorganisation in two tier areas. The White Paper can be accessed here: [English Devolution White Paper](#).
- 3.2. Cambridgeshire & Peterborough (C&P) already have devolved powers (through our Combined Authority); therefore, this report covers only the LGR aspects of the White Paper.
- 3.3. The Government intends to implement LGR in two tier areas and for those unitary councils where there is evidence of failure or where their size or boundaries may be hindering their ability to deliver sustainable and high-quality services for their residents.
- 3.4. On 5 February 2025, Jim McMahon, Minister of State for Local Government and English Devolution, invited proposals to establish unitary authorities across C&P (Appendix 2). Leaders have been asked to jointly submit an 'Interim Plan' or update to Government on or before 21 March 2025. This update does not commit the Councils to a particular course of action or fetter future decisions.
- 3.5. The Government want new unitary councils to be the right size to withstand financial shocks, achieve efficiencies, and avoid unnecessary fragmentation of services. Proposals that reflect 'sensible economic areas', help to increase housing

supply, and consider local history and culture are encouraged. The criteria for Councils to consider, when developing proposals, are appended to the Minsters letter.

- 3.6. Government have stated that new unitary authorities should aim for a population of 500,000 or more. However, the Government recognises that this may not make sense everywhere. Where an area believes that is the case it should set out the rationale in its proposal. Informally, there has been an indication that the minimum population the Government would consider is between 300,000 - 350,000. This is consistent with the previous Government's criteria which expected proposals with a population 'in excess of 300,000'.
- 3.7. There are approximately 930,000 (2024 estimate) residents across Cambridgeshire and Peterborough: around 150,000 in Cambridge; 90,000 in East Cambridgeshire; 104,000 in Fenland; 186,000 in Huntingdonshire; and 175,000 in South Cambridgeshire – making a total of 705,000 in the County area; plus 225,000 in Peterborough, which is already a unitary authority
- 3.8. Based on conservative assumptions the population of Cambridgeshire and Peterborough is expected to grow to over 1,060,000 over the next 15 years. That forecast does not include, for example, the emerging Greater Cambridge Local Plan for around 50,000 homes or 120,000 people, or any potential population increases arising from plans to be developed by the Government owned Cambridge Growth Company or arising from East West Rail.

## 4.0 Conclusions

- 4.1 The White Paper sets out the Government's intent to progress reorganisation swiftly, including through legislative measures if it becomes necessary to ensure progress. The reorganisation of local government in C&P may arrive regardless of the Council's view; therefore, it is important that East Cambridgeshire District Council has a considered view as to the most optimal arrangements for East Cambridgeshire residents and the wider C&P region.
- 4.2 The indicative LGR timeline for all 2 -Tier areas (other than Surrey and those in the Devolution Priority Programme) is as follows:

Activity	Period
Govt issues statutory invite for LGR proposals	5 February 2025
Councils respond to 5 February MHCLG letter	21 March 2025
Councils submit final LGR proposals	28 November 2025
Govt consultation	January to April 2026
Govt decision on proposals	May – August 2026
LGR legislation prepared and laid	May – August 2026
Any transitional legislation required prepared and laid	May – December 2027
Shadow Unitary Elections (as soon as possible)	May – December 2027
New Unitaries Go – Live	April 2028

- 4.3 Leaders and Chief Executives across C&P have met on several occasions to discuss how each local authority will work together to progress any final proposals for LGR that are required to be submitted in November 2025

- 4.4 To meet the governments first deadline a letter has been drafted (Appendix 1) as the proposed submission to Government by 21 March 2025. This letter has been endorsed by all Councils in C&P, with the exception of Fenland District Council.
- 4.5 While a unified C&P agreement on a final submission to Government is possible and optimal, competing proposals may emerge. The Government has also indicated that only one proposal is required from an area, and it does not need to be endorsed by all impacted local authorities. If more than one proposal is submitted, then Ministers would make the final determination on their preferred option to progress. Therefore, there is no guarantee that any proposal which East Cambridgeshire District Council endorses would be adopted by Government. However, active participation ensures the Council may have a say in shaping the future structure of local government in C&P.
- 4.6 The Government expects councils to decide how best to engage locally in a constructive way and to evidence that in their proposals. An initial survey of residents was launched on 14 February 2025. Over 890 residents have responded to date. A summary of the results are provided in Appendix 3. These early findings will help to shape the initial proposals coming forward. However more consultation with residents, partners and key stakeholders will be required at the appropriate time.

**Next Steps**

- 4.7 Chief Executives have commissioned finance and data analysts from each authority to develop a financial model to evaluate different unitary options. This will allow the Council to review the financial implications of various options, including the potential for savings and efficiencies. An options analysis will be undertaken once the model has been developed and assured. Changes to the system of local government finance expected to be announced in the summer will have an impact on that modelling but are not expected to change the fundamental conclusions. This work has commenced and will continue over the Spring and Summer.
- 4.8 There is currently no agreed single proposal for unitarisation across C&P. Detailed analysis will begin once a short-list of preferred options has been agreed. It is realistic that agreement on a single preferred option for Cambridgeshire and Peterborough can be reached by 28 November 2025.
- 4.9 Substantive proposals for reorganisation will be brought back to Council for discussion and approval. This may entail additional meetings of the Council.

**5.0 Additional Implications Assessment**

<b>Financial Implications</b>  NO	<b>Legal Implications</b>  NO	<b>Human Resources (HR) Implications</b>  NO
<b>Equality Impact Assessment (EIA)</b>  NO	<b>Carbon Impact Assessment (CIA)</b>  NO	<b>Data Protection Impact Assessment (DPIA)</b>  NO

## **Financial Implications**

- 5.1 There are no financial implications associated with the interim response. However, there will be costs associated with planning and developing a final proposal. Government has indicated that it will provide some resources to support the preparation of proposals and that this would be confirmed later in the process.

## **Legal implications**

- 5.2 The Local Government and Public Involvement in Health Act 2007 provides the key statutory framework for local government reorganisation. The Secretary of State can at any time invite proposals for reorganisation
- 5.3 The Government does not currently have power to direct local authorities to bring forward proposals as these expired shortly after the legislation was first introduced. However, the Government has indicated it is planning to legislate to reintroduce the power to direct.
- 5.4 The invitations issued under previous governments often state that existing districts must be used as the 'building blocks' from which new authorities are to be constructed. The current advice from MHCLG is that proposals which disaggregate district boundaries must have a strong justification.

## **Human Resources**

- 5.5 There are no staffing implications associated with the interim response; however it is likely to be an unsettling time for some staff. It is important to note that all staff will transfer automatically to one of the new authorities under 'TUPE' regulations (Transfer of Undertakings (Protection of Employment)). As the process is at such an early stage it is impossible to provide further information on this, however the Council is mindful of the valuable contribution Officers make in delivering services. A separate staff communications and engagement plan is being developed, so that staff are kept informed, consulted and engaged in the process.

## **6.0 Appendices**

Appendix 1 - Council initial submission to MHCLG

Appendix 2 - Letter from Minister Jim McMahon received on 5 February 2025

Appendix 3 – Resident survey draft results

## **7.0 Background documents**

English Devolution White Paper December 2024

## DRAFT LETTER TO MHCLG

Jim McMahon OBE MP  
Minister of State for Local Government and English Devolution  
2 Marsham Street  
London  
SW1P 4DF

21 March 2025

Dear Jim

Thank you for your letter of 5 February.

Cambridgeshire and Peterborough is in a unique position in relation to the Government's proposals. We are the only Mayoral Combined Authority area with two-tiers of local government, which also includes a unitary authority.

All authorities in Cambridgeshire and Peterborough have set legal budgets for 2025/26. Looking ahead, both upper tier authorities are at risk from the current uncertainty surrounding the future of the high needs block statutory override due to expire in April 2026, and the anticipated business rates reset and Fair Funding review will put funding in the area at further risk of reduction.

Cambridgeshire and Peterborough, with its three cities (Cambridge, Peterborough and Ely), is a diverse area with a large rural population, three economic areas (CPIER final report)<sup>1</sup>; and a number of challenges including an ageing population, significant infrastructure gaps, high growth areas, demand for housing and extreme housing affordability challenges in some areas. Around 25% of the population of Cambridgeshire and Peterborough live in areas that are below the national median for indices of multiple deprivation, with areas across Fenland and Peterborough that are within the 10% most deprived areas nationally. Cambridge and Peterborough are two of the fastest growing cities in England, and the government has given

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<sup>1</sup> [cpier-report-151118-download.pdf](#)

Cambridge a prominent role in its national plans for sustainable economic growth and innovation.

Leaders from Cambridgeshire and Peterborough have been working closely and effectively together and have been meeting regularly with Chief Executives to work through the various options in relation to local government reorganisation (LGR). A working group of officers from all our authorities is also meeting regularly to develop a shared evidence base that can inform subsequent proposals.

We are entering into LGR with an open mind and spirit of wanting the best for all our residents and for the local area as a whole. Not all of us would have chosen this path but we accept that it is the path we are on.

We are not currently in a position to respond to all the points raised in your letter in the time available. Our Councils have been focused on setting legal budgets, driving efficiencies and improving services. Pre-election period begins on 25<sup>th</sup> March and local attention is now turning to Mayoral and County Council elections which may have a bearing on the development of our LGR plans.

Currently leaders are considering different unitary scenarios. However, further work will be required following local elections to reach a shared understanding of how best to progress these to the next stage/business case. These scenarios will take account of historic community identities, the interests of residents, economic geographies, and local politics. A strong economic base is a priority for us to counteract the significant pressures around Children's services (including education) and Special Educational Needs, Adult Social Care and Housing.

We will be spending the next few months considering the options, using data to inform our thinking, and using the LGR structures at officer and political level that have been put in place to enable a collaborative approach based on a jointly developed evidence base. We are focused on ensuring that any proposals ensure that future unitarities are financially sound – this is a shared principle amongst all leaders. This may require us to look at boundary changes for districts although this is not our preference.

We recognise that any new council configurations will reduce the number of leaders compared with our current arrangements for the Mayoral Combined Authority, which



under the government's plans would become a Strategic Mayoral Authority. There is a risk this could have an impact on democratic accountability across our area which will need careful consideration.

We welcome a further meeting with MLCHG where we can work through the areas where we would appreciate more support.

Yours sincerely

Cllr Anna Bailey, Leader, East Cambridgeshire District Council

Cllr Sarah Conboy, Leader, Huntingdonshire District Council

Cllr Mike Davey, Leader, Cambridge City Council

Cllr Dennis Jones, Leader, Peterborough City Council

Cllr Lucy Nethsingha, Leader, Cambridgeshire County Council

Cllr Bridget Smith, Leader, South Cambridgeshire District Council





**Ministry of Housing,  
Communities &  
Local Government**

**Jim McMahon OBE MP**

*Minister of State for Local Government and  
English Devolution*  
2 Marsham Street  
London  
SW1P 4DF

To: Leaders of two-tier councils and  
unitary council in Cambridgeshire  
Cambridge City Council  
Cambridgeshire County Council  
East Cambridgeshire District Council  
Fenland District Council  
Huntingdonshire District Council  
South Cambridgeshire District Council  
Peterborough City Council

5 February 2025

Dear Leaders,

This Government has been clear on our vision for simpler, more sustainable, local government structures, alongside a transfer of power out of Westminster through devolution. We know that councils of all political stripes are in crisis after a decade of decline and instability. Indeed, a record number of councils asked the government for support this year to help them set their budgets.

This new government will not waste this opportunity to build empowered, simplified, resilient and sustainable local government for your area that will increase value for money for council taxpayers. Local leaders are central to our mission to deliver change for hard-working people in every corner of the country through our Plan for Change, and our councils are doing everything they can to stay afloat and provide for their communities day in, day out. The Government will work closely with you to deliver these aims to the most ambitious timeline.

I am writing to you now to formally invite you to work with other council leaders in your area to develop a proposal for local government reorganisation, and to set out further detail on the criteria, guidance for the development of proposals, and the timeline for this process. A formal invitation with guidance for the development of your proposals is attached at Annex A. This invitation sets out the criteria against which proposals will be assessed.

**Developing proposals for reorganisation**

We expect there to be different views on the best structures for an area, and indeed there may be merits to a variety of approaches. Nevertheless, it is not in council taxpayers' interest to devote public funds and your valuable time and effort into the development of multiple proposals which unnecessarily fragment services, compete against one another, require lengthy implementation periods or which do not sufficiently address local interests and identities.

The public will rightly expect us to deliver on our shared responsibility to design and implement the best local government structures for efficient and high-quality public service delivery. We therefore expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.

This will mean making every effort to work together to develop and jointly submit one proposal for unitary local government across the whole of your area. The proposal that is developed for the whole of your area may be for one or more new unitary councils and should be complementary to devolution plans. It is open to you to explore options with neighbouring councils in addition to those included in this invitation, particularly where this helps those councils to address concerns about their sustainability or limitations arising from their size or boundaries or where you are working together across a wider geography within a strategic authority.

I understand there will be some cases when it is not possible for all councils in an area to jointly develop and submit a proposal, despite their best efforts. This will not be a barrier to progress, and the Government will consider any suitable proposals submitted by the relevant local authorities.

### **Supporting places through change**

It is essential that councils continue to deliver their business-as-usual services and duties, which remain unchanged until reorganisation is complete. This includes progress towards the Government's ambition of universal coverage of up-to-date local plans as quickly as possible. To support with capacity, I intend to provide some funds for preparing to take forward any proposal, and I will share further information later in the process.

Considering the efficiencies that are possible through reorganisation, we expect that areas will be able to meet transition costs over time from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.

The default position is that assets and liabilities remain locally managed by councils, but we acknowledge that there are exceptional circumstances where there has been failure linked to capital practices. Where that is the case, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation, and Commissioners should be engaged in these discussions. We will continue to discuss the approach that is proposed with the area.

I welcome the partnership approach that is being taken across the sector to respond to the ambitious plans set out in the White Paper. My department will continue to work closely with the Local Government Association (LGA), the District Councils Network, the County Councils Network and other local government partners to plan how best to support councils through this process. We envisage that practical support will be needed to understand and address the key thematic issues that will arise through reorganisation, including managing service impacts and opportunities for the workforce, digital and IT systems, and leadership support.

**Timelines and next steps for interim plans and full proposals**

We ask for an interim plan to be submitted on or before 21 March 2025, in line with the guidance set out in the attached Annex. My officials will provide feedback on your plan to help support you to develop final proposals.

I will expect any full proposal to be submitted **by 28 November**. If I decide to implement any proposal, and the necessary legislation is agreed by Parliament, we will work with you to move to elections to new 'shadow' unitary councils as soon as possible as is the usual arrangement in the process of local government reorganisation.

Following submission, I will consider any and all proposals carefully before taking decisions on how to proceed. My officials are available throughout to discuss how your reorganisation and devolution aspirations might work together and what support you think you might need to proceed.

This is a once in a generation opportunity to work together to put local government in your area on a more sustainable footing, creating simpler structures for your area that will deliver the services that local people and businesses need and deserve. As set out in the White Paper, my commitment is that clear leadership locally will be met with an active partner nationally.

I am copying this letter to council Chief Executives. I am also copying this letter to local Members of Parliament, to the Mayor of the Combined Authority and to the Police and Crime Commissioner.

Yours sincerely,



**JIM MCMAHON OBE MP**

Minister of State for Local Government and English Devolution

**LOCAL GOVERNMENT AND PUBLIC INVOLVEMENT IN HEALTH ACT 2007**

**INVITATION FOR PROPOSALS FOR A SINGLE TIER OF LOCAL GOVERNMENT**

The Secretary of State for Housing, Communities and Local Government, in exercise of his powers under Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act'), hereby invites any principal authority in the area of the county of Cambridgeshire, to submit a proposal for a single tier of local government.

This may be one of the following types of proposal as set out in the 2007 Act:

- Type A – a single tier of local authority covering the whole of the county concerned
- Type B – a single tier of local authority covering an area that is currently a district, or two or more districts
- Type C – a single tier of local authority covering the whole of the county concerned, or one or more districts in the county; and one or more relevant adjoining areas
- Combined proposal – a proposal that consists of two or more Type B proposals, two or more Type C proposals, or one or more Type B proposals and one or more Type C proposals.

Proposals must be submitted in accordance with paragraphs 1 to 3:

1. Any proposal must be made by **28 November 2025**.
2. In responding to this invitation an authority must have regard to the guidance from the Secretary of State set out in the Schedule to this invitation, and to any further guidance on responding to this invitation received from the Secretary of State.
3. An authority responding to this invitation may either make its own proposal or make a proposal jointly with any of the other authorities invited to respond.

Signed on behalf of the Secretary of State for Housing, Communities and Local Government.



**F KIRWAN**

A senior civil servant in the Ministry of Housing, Communities and Local Government

5 February 2025

## **SCHEDULE**

### **Guidance from the Secretary of State for proposals for unitary local government.**

#### **Criteria for unitary local government**

- 1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.**
  - a) Proposals should be for sensible economic areas, with an appropriate tax base which does not create an undue advantage or disadvantage for one part of the area.
  - b) Proposals should be for a sensible geography which will help to increase housing supply and meet local needs.
  - c) Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement.
  - d) Proposals should describe clearly the single tier local government structures it is putting forward for the whole of the area, and explain how, if implemented, these are expected to achieve the outcomes described.
  
- 2. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.**
  - a) As a guiding principle, new councils should aim for a population of 500,000 or more.
  - b) There may be certain scenarios in which this 500,000 figure does not make sense for an area, including on devolution, and this rationale should be set out in a proposal.
  - c) Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money.
  - d) Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.
  - e) For areas covering councils that are in Best Value intervention and/or in receipt of Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable.
  - f) In general, as with previous restructures, there is no proposal for council debt to be addressed centrally or written off as part of reorganisation. For areas where there are exceptional circumstances where there has been failure linked to capital practices, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation.

### **3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.**

- a) Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services.
- b) Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.
- c) Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety.

### **4. Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.**

- a) It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal.
- b) Proposals should consider issues of local identity and cultural and historic importance.
- c) Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.

### **5. New unitary structures must support devolution arrangements.**

- a) Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor.
- b) Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution.
- c) Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.

### **6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.**

- a) Proposals will need to explain plans to make sure that communities are engaged.
- b) Where there are already arrangements in place it should be explained how these will enable strong community engagement.

## **Developing proposals for unitary local government**



The following matters should be taken into account in formulating a proposal:

### **Boundary Changes**

- a) Existing district areas should be considered the building blocks for your proposals, but where there is a strong justification more complex boundary changes will be considered.
- b) There will need to be a strong public services and financial sustainability related justification for any proposals that involve boundary changes, or that affect wider public services, such as fire and rescue authorities, due to the likely additional costs and complexities of implementation.

### **Engagement and consultation on reorganisation**

- a) We expect local leaders to work collaboratively and proactively, including by sharing information, to develop robust and sustainable unitary proposals that are in the best interests of the whole area to which this invitation is issued, rather than developing competing proposals.
- b) For those areas where Commissioners have been appointed by the Secretary of State as part of the Best Value Intervention, their input will be important in the development of robust unitary proposals.
- c) We also expect local leaders to engage their Members of Parliament, and to ensure there is wide engagement with local partners and stakeholders, residents, workforce and their representatives, and businesses on a proposal.
- d) The engagement that is undertaken should both inform the development of robust proposals and should also build a shared understanding of the improvements you expect to deliver through reorganisation.
- e) The views of other public sector providers will be crucial to understanding the best way to structure local government in your area. This will include the relevant Mayor (if you already have one), Integrated Care Board, Police (Fire) and Crime Commissioner, Fire and Rescue Authority, local Higher Education and Further Education providers, National Park Authorities, and the voluntary and third sector.
- f) Once a proposal has been submitted it will be for the Government to decide on taking a proposal forward and to consult as required by statute. This will be a completely separate process to any consultation undertaken on mayoral devolution in an area, which will be undertaken in some areas early this year, in parallel with this invitation.

### Interim plans

An interim plan should be provided to Government on or before **21 March 2025**. This should set out your progress on developing proposals in line with the criteria and guidance. The level of detail that is possible at this stage may vary from place to place but the expectation is that one interim plan is jointly submitted by all councils in the area. It may be the case that the interim plan describes more than one potential proposal for your area, if there is more than one option under consideration. The interim plan should:

- a) identify any barriers or challenges where further clarity or support would be helpful.
- b) identify the likely options for the size and boundaries of new councils that will offer the best structures for delivery of high-quality and sustainable public services across the area, along with indicative efficiency saving opportunities.
- c) include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.
- d) include early views as to the councillor numbers that will ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will balance the unique needs of your cities, towns, rural and coastal areas, in line with the Local Government Boundary Commission for England guidance.
- e) include early views on how new structures will support devolution ambitions.
- f) include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local engagement to help shape your developing proposals.
- g) set out indicative costs of preparing proposals and standing up an implementation team as well as any arrangements proposed to coordinate potential capacity funding across the area.
- h) set out any voluntary arrangements that have been agreed to keep all councils involved in discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and ensure value for money for council taxpayers, with those key decisions that will affect the future success of any new councils in the area.



East Cambridgeshire  
District Council

# **Have Your Say East Cambs**

Interim survey results analysis

6 March 2025

## Summary

East Cambridgeshire District Council issued a [residents' survey](#) following the government announcement that district and county councils are to be merged into unitary authorities.

The survey was drafted to serve the following purposes:

- raise awareness of these changes among residents
- help identify which current services offered by the district council residents value the most
- give residents the opportunity to share their views on Local Government Reorganisation
- provide valuable data which can be used to help inform and support future LGR proposals

The survey was promoted via social media (Facebook and X) and an accompanying [press release](#).

Information has also been added to the [council's website](#).

The survey was launched on 14 February. To date (6 March), 890 people have completed the survey. The survey was completed mainly by women (63%) and by people over the age of 45 (75%). There is a good selection of responses from across all East Cambs postcodes.

## Key findings

There is overwhelmingly strong support for the district council and the services it provides. This is reflected in the responses and the comments.

78% do not support the idea of councils merging (8% do and 14% are not sure).

93% felt it was very important to have access to a local councillor.

92% would like to be engaged more on the issue.

The areas which people felt most strongly about were:

- having local councillors who understands and knows the local area (93% said it was very important)

- giving local communities a say in how much housing development takes place and where it goes (93% answered “yes” to a yes / no question)
- maintaining financial stability (89% said it was very important)
- helping to create safer environments (85% said it was very important)
- having a councillor who is elected from a broad range of ordinary people (82% said it was very important)

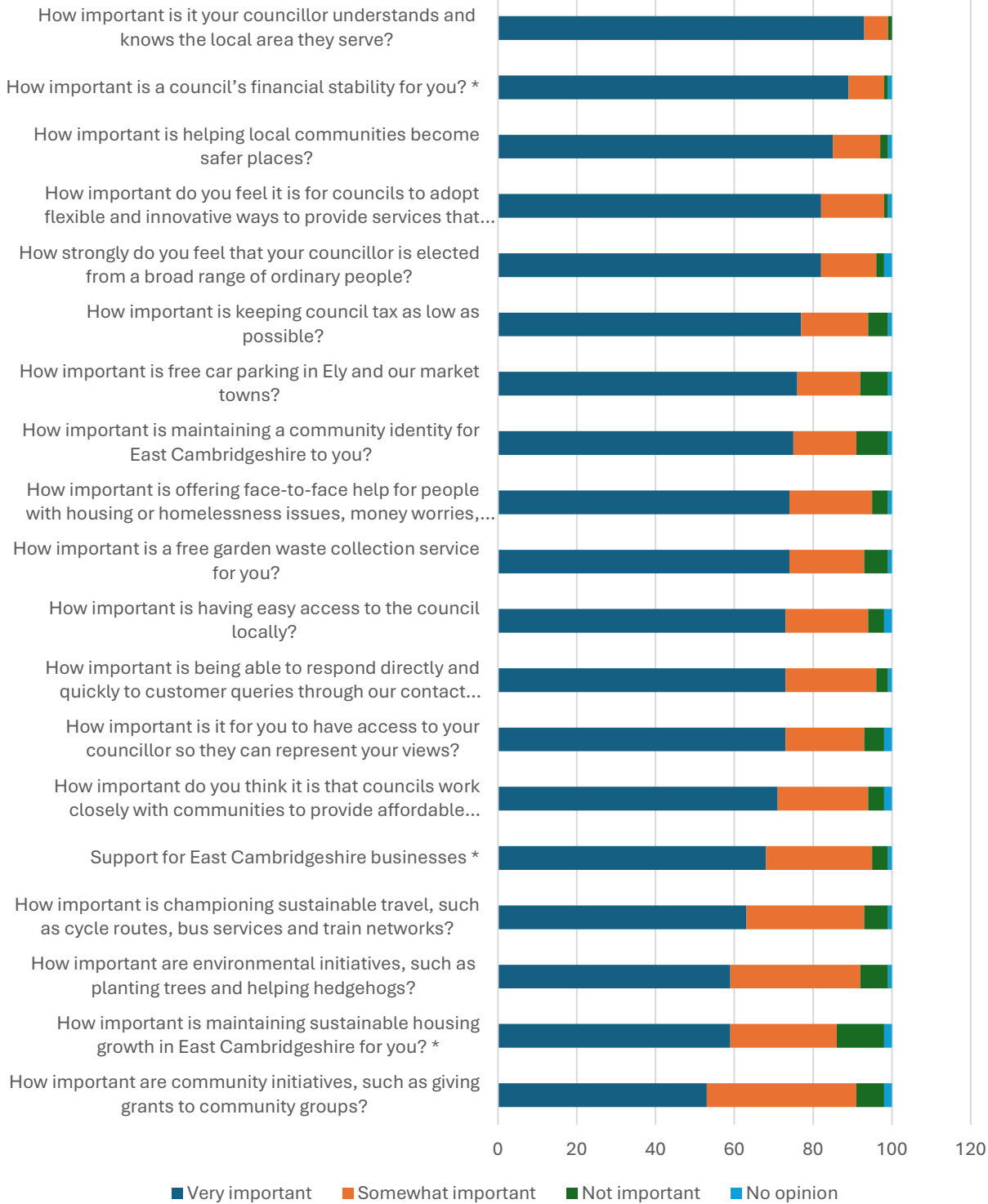
The areas which people felt least strongly about – but still felt strongly - were:

- supporting community initiatives (53% said it was very important)
- maintaining sustainable housing growth (59% said it was very important)
- supporting environmental initiatives, such as planting trees and helping hedgehogs (59% said it was very important)
- championing sustainable travel (63% said it was very important)

### Location

People were split between whether they looked towards Cambridge (53%) or kept their focus within the district (44%) when it came to work, socialising, or shopping. Only 1% said they looked towards Peterborough and 2% referenced Cambridge and Peterborough

Question summary



## Comments

304 people choose to make an additional comment

An analysis of the sentiment of these comments show:

- 75% are against LGR
- 18% of comments were neutral/ did not directly relate to LGR
- 7% were in support of LGR
- Four comments claimed the survey was too leading

Of those who were against, the following themes emerged:

