

**LAND EAST OF
HORSEHEATH ROAD,
LINTON
GREATER CAMBRIDGE
LOCAL PLAN - FIRST
PROPOSALS
CONSULTATION 2021**

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1.0 Introduction

- 1.1 These representations are prepared by Bidwells LLP on behalf of Pembroke College, Cambridge in response to the Greater Cambridge Local Plan ‘First Proposals’ (Preferred Options) 2021 Consultation.
- 1.2 Pembroke College is promoting an area circa 7.12ha of land to the east of Horseheath Road in Linton (“the Site) for allocation within the emerging Local Plan. A site Location plan is included at **Appendix 1**.
- 1.3 The site has been promoted through the earlier Call for Sites and Issues and Options Stages of the Local Plan Process and is identified in the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) under site reference 40302.
- 1.4 The representations seek to add to the promotion of the site for inclusion in the Local Plan as a suitable, available and achievable site for sustainable development.
- 1.5 Land to the east of Horseheath Road, Linton is available now and within single ownership. The facilities and services of Linton are accessible from the site by cycling and walking and the facilities and services of Cambridge and Haverhill are accessible by public transport.
- 1.6 The site presents a sustainable opportunity to re-develop a largely unconstrained site immediately adjoining the existing built up area of the village and is capable of delivering up to 130 new homes within the plan period, along with the creation of significant new public open space and landscaping.

2.0 Site Context and Summary of the Proposals

Site Context

- 2.1 The site is located to the east of Linton and lies within the South Cambridgeshire District. The site measures approximately 7.29 hectares (ha) and is currently in agricultural use.
- 2.2 The site is assessed under the HELAA as site reference 40302, map 434 (Land between Balsham Road and Horseheath Road, Linton).
- 2.3 To provide a brief recap of the site and its surroundings, the site is bound to the north east by an existing mature tree belt, with agricultural land beyond, and to the west by existing residential development. Horseheath Road runs along the southern boundary of the site.
- 2.4 The site is not located in a conservation area and there are no listed buildings on site. To the north of Linton lies the Rivey Hill Water Tower.
- 2.5 A number of bus services operate through the village providing public transport to Cambridge, Haverhill, Saffron Walden and Newmarket. The 13A/B/C Gold runs an hourly service from Linton to Cambridge. A dedicated footpath starts approximately 300m from the proposed site access and runs to the centre of Linton.
- 2.6 There are no proposed changes to Linton's positioning in the Settlement Hierarchy as a Minor Rural Centre and as such the services set out in the previous assessment of shops and services including the Linton Village College remains valid; and supported by the Council's updated Village Classification Report

Planning and Local Plan Context

- 2.7 There have been several planning consents for new homes granted to the east side of Linton that help set the context. Outline Permission and Reserved Matters approval was granted for 42 dwellings on the land to the south of the site. Outline Permission and Reserved Matters Approval have been granted for up a further 55 dwellings on Land North and South of Bartlow Road. An Outline Application for up to 65 dwellings to the south of Balsham Road was refused permission on the grounds that insufficient information has been submitted in relation to traffic generation and impact on the public highway, and impact on features of archaeological interest; but not refused on the principle of development. The Local Planning Authority has already established that development to the east of the village is appropriate.
- 2.8 The earlier representation, by Pembroke College, made to the Issues and Options Stage included details relating to the opportunities provided by the site for landscaping and enhancing the connectivity around the site by upgrading the public rights of way that runs along the northern boundary. The urban design assessment (provided in full with the Issues and Options representation) sets out the possibilities for development including the provision of a substantial tree belt to provide screening from the surrounding areas, the opportunities for the delivery of market and affordable housing and opportunity to provide specialist housing, including housing for older people and custom/self-build housing.

Development Proposals

- 2.9 The site was promoted during the Issues and Options consultation stage for allocation for residential development for around 130 dwellings, open space, associated infrastructure including offsite improvements to the footpaths and cycleways into and out of Linton, Sustainable Drainage Systems and enhanced opportunities for the development of biodiversity.
- 2.10 The eastern edge of the site is formed by an established tree belt that forms a distinct separation between the village and the countryside beyond. The proposal site remains to the village side of the tree belt and would be more visually related to the village than the open countryside. The site would be seen as a natural extension to the village, lying on the flatter ground before the land slopes up to the north east.
- 2.11 The logic to placing new residential development to the east side of Linton is further supported by reference to the permitted residential schemes to the south of the site, such that the development of the site would represent a logical progression across the eastern edge of the village to deliver a planned entrance, with a greater amount of structural landscaping and open space.

3.0 Policy S/DS: Development Strategy

- 3.1 The policy direction is to focus “**development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.... We propose to reinforce the distinctive character of our city, towns and villages through developing sites that can be well-integrated with existing communities. Using less land for development reduces our carbon emissions, and allows more space for nature and wildlife, so we propose that sites should be developed at densities, and using appropriate forms and patterns of development, which make best use of land while creating well-designed, characterful places.**”¹
- 3.2 This policy direction is supported in trying to achieve sustainable development. The opportunities to grow sustainable locations for development will evolve over time as significant planned improvements are made to local infrastructure such as highway networks, public transport provision and strategic cycle routes.
- 3.3 For Linton, there is a host of village services available within walking/cycling distance of the site, along with public transport options available from Linton to Cambridge, Haverhill and further afield. Linton is one of the better served villages with a host of facilities, shops and services, far in excess of most villages throughout the District.
- 3.4 There are significant committed funds to improve the A1307 corridor and provide for better sustainable travel infrastructure. The emerging Local Plan refers to better locating development along transport corridors, especially those that offer sustainable modes of transport.
- 3.5 The Cambridge South East Transport project seeks to ease congestion and offer sustainable travel choices, connecting communities and supporting growth. Phase 1 of the improvements (A1307, Linton Greenway Works) are near completion. Construction work will continue towards Babraham Road Park and Ride in the New Year (2022). The Local Authority has begun Phase 2 and is currently consulting Landowners on the proposed active travel route between the new A11 Travel Hub and Granta Park (including along Newmarket Road), the engagement period runs until 13 December 2021. The details for the improvements to the A1307 infrastructure links and the route for the Linton Greenway have been included at **Appendix 2**, but clearly represent committed and significant investment to increase the sustainable travel opportunities along the A1307; for whole journeys, or to reduce the journey length taken by the private car.
- 3.6 The improvements to the sustainable transport routes along the 1307 include proposals for a new rural hub (Bartlow Road Roundabout and Rural Hub), further supporting the east side of Linton as an appropriate location for development.

¹Greater Cambridge Local Plan – First Proposals (Policy S/DS: Development Strategy)- [Policy S/DS: Development strategy | Greater Cambridge Shared Planning \(greatercambridgeplanning.org\)](#)

Figure 1: Linton Greenway Route ²



² Greater Cambridge – Cambridge South East Transport A1307 Schemes ([Print \(greatercambridge.org.uk\)](http://greatercambridge.org.uk))

4.0 Policy S/SH: Settlement Hierarchy

- 4.1 The policy direction seeks to “**direct development to the most sustainable locations in the district.**” The assessment made in the Village Classification Study (2012), updated in Appendix 1H of Topic Paper 1, Settlement Hierarchy Study, remains valid and appropriate and is proposed to be carried forward into the new local plan, with three exceptions:
- Cambourne is a growing centre, with a growing level of services, facilities and transport opportunities. This has been recognised by it now having a town council, and it is considered that this should be recognised in the local plan.
 - Cottenham should be classified as a Minor Rural Centre reflecting a revision to the criteria for Rural Centres that they must all have high quality public transport in the form of a segregated public transport route such as the Greater Cambridge Partnership schemes or the Cambridgeshire Guided Busway, which is not the case for Cottenham.
 - Babraham should be classified as a Group village as it has a primary school, for consistency with other group villages.
- 4.2 The site being promoted under reference 40302 (Land East of Horseheath Road) is in Linton. The policy direction seeks to maintain Linton’s position and status in the settlement hierarchy as a Minor Rural Centre; however, the infrastructure improvements being made under the Cambridge South East Transport project seeks to provide better connections between Linton and Cambridge which support Linton to achieve the status of Rural Centre, given the great range of existing services that are akin to a Rural Centre, which include:
- A community Library;
 - Post office;
 - Community sports centre;
 - Public houses;
 - Coop food stores;
 - Linton Village College;
 - Junior High School;
 - Infant School;
 - Linton Zoo;
 - Doctors Surgery;
 - Village Hall;
 - Veterinary Practice;
 - Nursing Home;
 - Retirement Living;
 - Parish Church.
- 4.3 Further upgrades and improvements to the existing services and transport infrastructure in Linton can be secured through S106 agreement and financial contributions, associated with new development.

5.0 Policy H/DC: Dwellings in the Countryside

5.1 This policy direction sets out the types of residential development that may be acceptable in the countryside outside of defined settlement boundaries. Such units include:

“For dwellings of exceptional quality in the countryside, set out that a single new bespoke dwellings of exceptional quality will be permitted provided that:

- *the dwelling would reflect the highest standards in architecture and be recognised as truly outstanding or innovative,*
- *the dwelling would significantly enhance its immediate setting,*
- *the nature, size and design of the dwelling and site are sensitive to the defining characteristics of the local area and to wider views, and*
- *that there are no existing dwellings on the site capable of being replaced.”*

5.2 The direction this policy takes provides some flexibility for providing development in the countryside, while ensuring the setting is not adversely affected.

5.3 The site being promoted under reference 40302 (Land East of Horseheath Road, Linton), is being promoted on behalf of Pembroke College, a landowner seeking to provide high quality housing, while wishing to work closely with the local communities to fully understand what they would like to see in this development, including the form of housing and who it should serve.

5.4 The development proposals have been carefully considered to respond to the natural constraints and opportunities. This includes:

- Locating the developable area near the existing built up areas of Linton;
- Opportunities for market, affordable, retirement living, and custom/self-build units;
- Extensive planting and open space to provide a boundary and screening between the development and the surrounding countryside;
- Providing additional links into the existing countryside footpaths

Housing and Economic Land Availability Assessment (HELAA)

5.5 The Housing and Economic Land Availability Assessment (HELAA) provides an assessment of the site based on the suitability, availability and achievability. The Local Authority have assessed the site as follows:

- **Suitability- red**
- **Achievability – green**
- **Availability – green**

5.6 The suitability rating of the site has been decided based on the potential impact on the landscape should the whole site be developed.

“The site forms the southern larger part of a pair arable field. Views to the site are limited from the north and filtered from the south but the area is a foreground to views of Rivey Hill, and its ancient woodland and listed water-tower. Development of the whole site would have negative

landscape impacts and would represent a significant extension into the rural character of the countryside at the village edge, and proposed development could include the higher parts of the site blocking views to Rivey Hill.”

- 5.7 The assessments submitted demonstrate that the proposed 130 dwellings can be accommodated on only a proportion of the site leaving the majority available for landscaping and biodiversity enhancements, alongside providing links through the site to tie into the existing footpaths and provide better connectivity with the village centre.
- 5.8 The higher parts of the site, as the land rises up the slope, provide opportunities for biodiversity enhancements and planting rather than built development. In doing so the design of the proposals allow for the protection of the views over to the Rivey Hill Water Tower.
- 5.9 The Council is requested to reassess the landscape impacts of the proposal based on the proposal submitted; whereby it is not the intention to develop the whole site, but rather the full extent of land is put forward to the Local Plan so that any land allocation can include for areas of structural landscaping and open space. Furthermore, the 130 dwellings are an initial yield generated by the first stage concept design; this number can be revised as part of a collaborative design-led approach.
- 5.10 With an assessment based on the partial development of the land as proposed, it remains the case that the site at Horseheath Road Linton would achieve a ‘green’ rating for Suitability and so be a deliverable site for allocation by the Planning Authority.

Housing Need

- 5.11 The need to allocate the site for residential-led development is further supported by an assessment of the housing need set out by the First Proposals consultation documents. The full technical assessment is enclosed with this representation at **Appendix 3**, but it concludes that economic and housing need must be assessed together and inform each other such that the First Proposals is underproviding for the identified needs.
- 5.12 It is acknowledged that economic growth must be sustainable and that it would be inappropriate to determine a level of need that is undeliverable, as advocated by the NPPF. It is also acknowledged that it is difficult to determine exactly how much employment need there is in the context of such a vibrant economy. It is unique and therefore the approach to assessing need set out in the PPG is perhaps not the most appropriate. Certainly, extra care is needed when considering the veracity of economic models, such as the EEFM, that have consistently downplayed economic growth from key sectors over several iterations in recent years. It might therefore be more appropriate, at least as a reasonable alternative, to reverse the analysis and instead consider the available capacity for growth in the area and determine how this sits with the various economic projections under consideration.
- 5.13 On the subject of reasonable alternatives, the SA accompanying the GCLP first proposals consultation fails to even consider the potential effects of a higher level of economic growth. This is clearly unreasonable; the evidence base itself highlights the uncertainty as to the level of employment need and identifies methodologies and scenarios that would result in a considerably higher level of employment need than the first proposals suggest.
- 5.14 In terms of housing need, in the case of Greater Cambridge this is simply a function of facilitating economic growth and determining the acceptable level of commuting. The latter will inevitably be a strategic matter for the purposes of the Duty to Cooperate unless the GCLP can show that it is accommodating its full objectively assessed housing need.

- 5.15 At this stage, with such considerable uncertainty regarding how much greater the employment need is, it is certainly the case that the actual housing need is far higher than that set out in the First Proposals consultation and therefore more land needs to be allocated for housing. To provide for that additional housing it would be appropriate to allocate homes at appropriate villages to bring investment and support to existing communities, but also limit the risk currently within the Council's proposed housing trajectory, which relies on a few sites to deliver its housing needs. In the next Local Plan consultation iteration, it should include for more allocations at the villages; not least site 40302, Land East of Horseheath Road, Linton.
- 5.16 Furthermore, the SA fails to consider any alternative other than the level of need set out in the GCLP First Proposals consultation. Quite clearly, if there is uncertainty about the level of employment need, there is also uncertainty about the level of housing need, and the SA should reflect that. Equally, in its consideration of reasonable alternatives, the SA fails to recognise that the greater in-commuting resulting from a higher employment need would be negated by increased housing. Its reasons for limiting the assessment of reasonable alternatives are self-defeating. Locations such as Linton, with its foundation for sustainable development, provide the opportunity to truly assess the housing need in Greater Cambridge and deliver the number of homes needed to support the significant economic growth anticipated within the authoritative area.

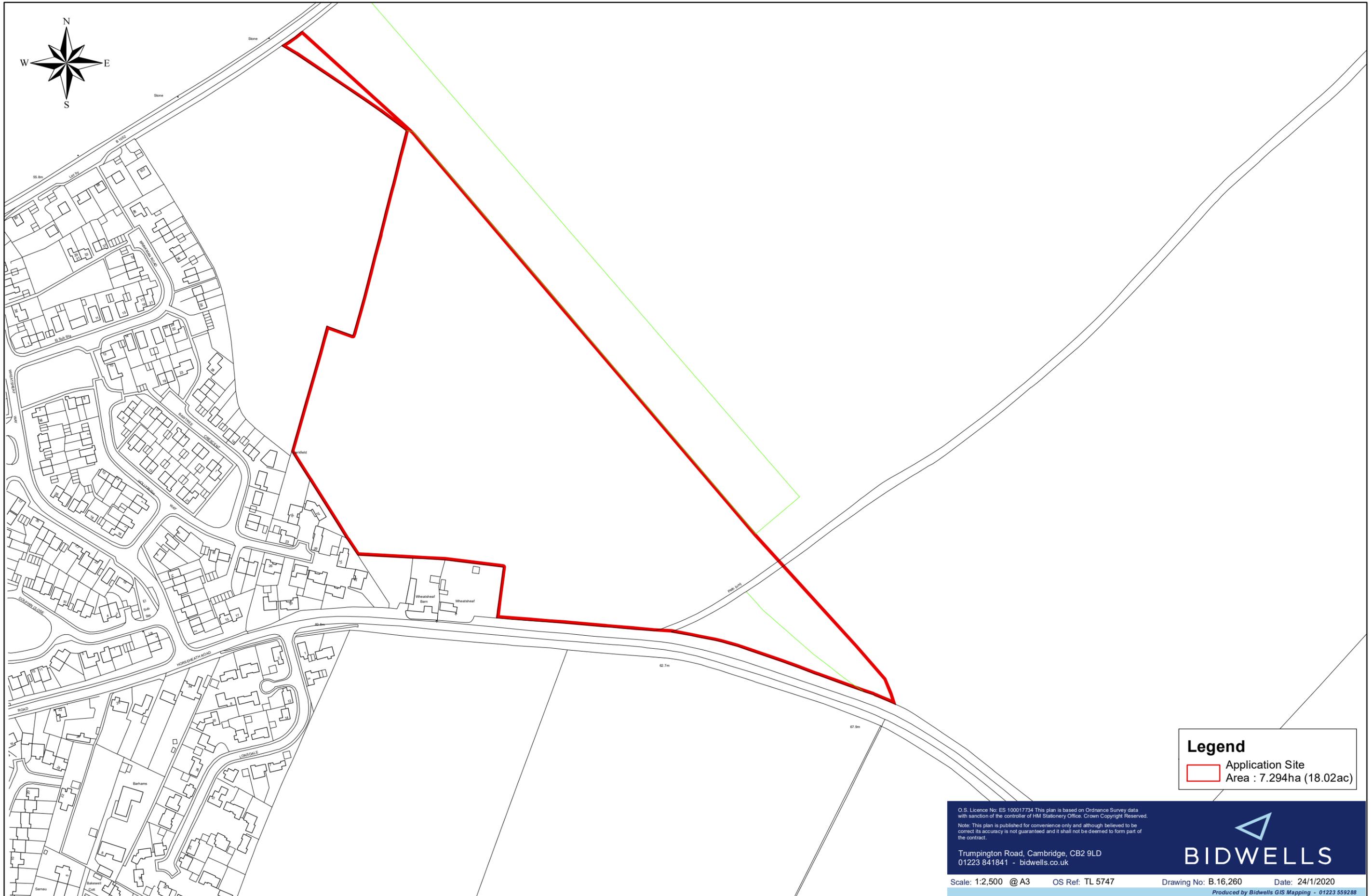
6.0 Conclusions

- 6.1 These planning representations have been prepared by Bidwells LLP on behalf of Pembroke College Cambridge in response to the Greater Cambridge Local Plan First Proposals Consultation.
- 6.2 The representations support the identification of Land to the east of Horseheath Road, Linton as an ‘included’ site in the HELAA and the Greater Cambridge Local Plan. An appropriate landscape assessment of the proposal as a partial development of the site, as always proposed, finds it to have a ‘green’ Suitability rating and so emerges as a deliverable site.
- 6.3 Alongside, it is evident that the Local Plan should be catering for additional homes, to support economic needs of the area and that such additional home should be allocated, in part, at the villages to provide a robustness to the housing trajectory to reduce the risk of relying on a small number of sites to fulfil a rolling five-year housing supply and to fulfil the Local Plan housing needs. As such the site should be allocated in the next publication stage of the emerging Local Plan.
- 6.4 Land to the east of Horseheath Road, Linton is available now and within single ownership. The facilities and services of Linton are accessible from the site by cycling and walking and the facilities and services of Cambridge and Haverhill are accessible by public transport. In addition, major transport improvements are committed to better connect Linton through to Cambridge.
- 6.5 It presents a sustainable opportunity to develop a largely unconstrained site immediately adjoining the existing built up area of the village and is capable of delivering up to 130 new homes within the plan period.
- 6.6 Pembroke College look forward to working with Greater Cambridge and stakeholders to take forward a successful residential development at Linton.

APPENDIX 1

SITE LOCATION PLAN

Land north of Horseheath Road, Linton



Legend
Application Site
Area : 7.294ha (18.02ac)

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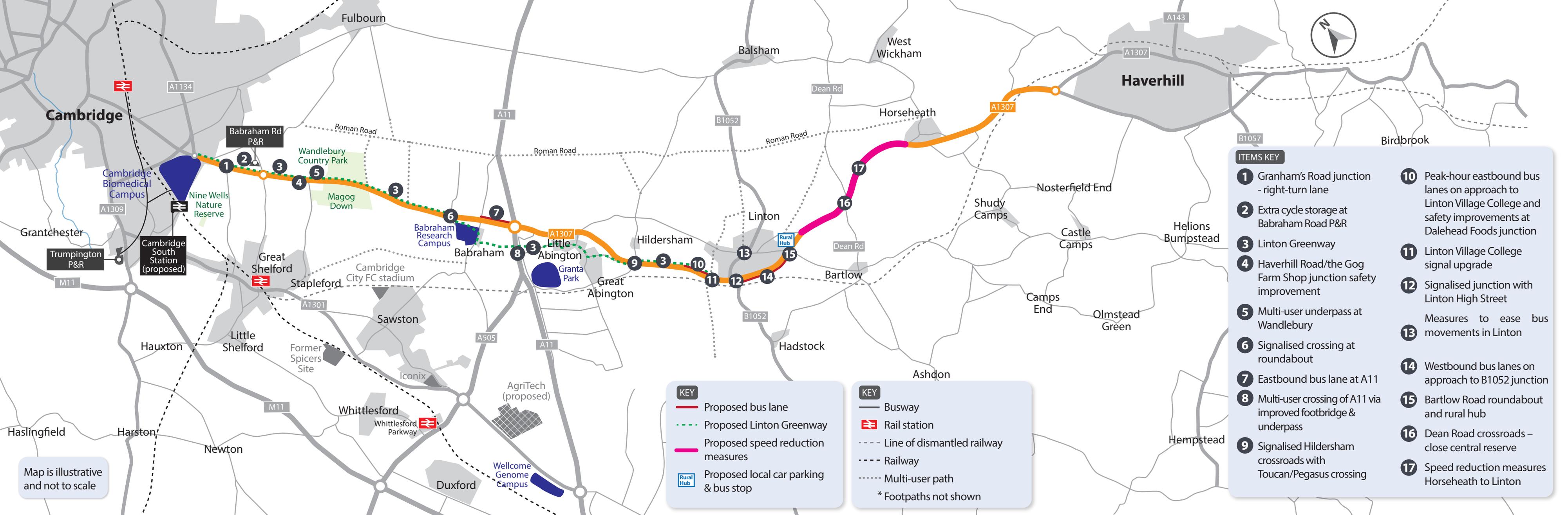
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Scale: 1:2,500 @ A3 OS Ref: TL 5747 Drawing No: B.16,260 Date: 24/1/2020
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APPENDIX 2

A1307 INFRASTRUCTURE IMPROVEMENTS



Map is illustrative and not to scale

KEY

- Proposed bus lane
- - - Proposed Linton Greenway
- Proposed speed reduction measures
- Rural Hub Proposed local car parking & bus stop

KEY

- Busway
- Rail station
- Line of dismantled railway
- Railway
- Multi-user path
- * Footpaths not shown

ITEMS KEY

<ul style="list-style-type: none"> 1 Granham's Road junction - right-turn lane 2 Extra cycle storage at Babraham Road P&R 3 Linton Greenway 4 Haverhill Road/the Gog Farm Shop junction safety improvement 5 Multi-user underpass at Wandlebury 6 Signalised crossing at roundabout 7 Eastbound bus lane at A11 8 Multi-user crossing of A11 via improved footbridge & underpass 9 Signalised Hildersham crossroads with Toucan/Pegasus crossing 	<ul style="list-style-type: none"> 10 Peak-hour eastbound bus lanes on approach to Linton Village College and safety improvements at Dalehead Foods junction 11 Linton Village College signal upgrade 12 Signalised junction with Linton High Street 13 Measures to ease bus movements in Linton 14 Westbound bus lanes on approach to B1052 junction 15 Bartlow Road roundabout and rural hub 16 Dean Road crossroads - close central reserve 17 Speed reduction measures Horseheath to Linton
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APPENDIX 3
**GREATER CAMBRIDGE EMPLOYMENT &
HOUSING NEED**

**GREATER CAMBRIDGE
EMPLOYMENT AND HOUSING
NEED**

Greater Cambridge Employment and Housing Need

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1 Introduction

- 1.1 This report has been prepared by Bidwells LLP, to support representations on the first proposals for the Greater Cambridge Local Plan (GCLP). The report explores the evidence on housing and employment need produced by the Greater Cambridge Shared Planning Team (GCSPT) that are preparing the GCLP for Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC).
- 1.2 The GCLP first proposals suggest requirements of 44,400 homes and 58,500 new jobs between 2020 and 2041. Accommodation for gypsies, travellers and travelling show people sites will be proposed but numbers are still to be confirmed.
- 1.3 The objective assessment of housing and employment need is a requirement of the National Planning Policy Framework (NPPF)¹ and should adhere to the accompanying Planning Practice Guidance (PPG).
- 1.4 NPPF paragraph 8 explains that to achieve sustainable development, the planning system has three interdependent objectives:

- “a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and*

future needs and support communities’ health, social and cultural well-being; and

- c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

- 1.5 NPPF paragraph 11 then explains how the presumption in favour of sustainable development functions for plan-making:

- “a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas², unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area³; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

¹ [MHCLG. \(July 2021\). National Planning Policy Framework.](#)

² *“As established through statements of common ground (see paragraph 27).”*

³ *“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific*

Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.”

Greater Cambridge Employment and Housing Need

1.6 It is within this context that the GCSPT prepared or commissioned the following:

- The Employment Land and Economic Development Evidence Study (ELEDES)⁴
- The Housing and Employment Relationships (HER) report⁵
- The Development Strategy Topic Paper⁶
- The Sustainability Appraisal (SA)⁷

1.7 These reports are considered in the following three chapters with Chapter 5 providing conclusions and recommendations.

⁴ GL Hearn, SQW & Cambridge Econometrics. (November 2020). Greater Cambridge Employment Land and Economic Development Evidence Study.

⁵ GL Hearn. (November 2020). Greater Cambridge Local Plan: Housing and Employment Relationships.

⁶ GCSPT. (November 2021). Development Strategy Topic Paper.

⁷ LUC. (October 2021). Greater Cambridge Local Plan: First Proposals Sustainability Appraisal.

2 Employment Need

2.1 As set out in the previous chapter, the NPPF's economic objective set out in paragraph 8 is to:

"help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;"

2.2 This should be read in the context of NPPF paragraph 16, which highlights that plans should be prepared positively, in a way that is aspirational but deliverable. NPPF paragraph 35 is also relevant, which makes clear that plans are 'sound' if they are positively prepared - providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs.

2.3 Chapter Six of the NPPF then sets out specific economic principles with paragraph 81 stating that:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁸, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."

⁸ "The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility;

2.4 The Government sees Cambridge's life sciences cluster as a significant unique selling point for UK PLC when seeking trade partners globally, with UK Trade & Investment (UKTI, now part of the Department for International Trade) committing to help in securing inward investment as part of the 2014 Growth Deal⁹. The importance of its success for the national economy post-Brexit and Covid-19 should not be underestimated. Indeed, the £2.9 billion it contributes to the UK economy was highlighted in the recent consultation on the Oxford-Cambridge Arc Spatial Framework¹⁰.

2.5 NPPF paragraph 82 continues by making clear that planning policies should:

- "a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."*

2.6 Finally, NPPF paragraph 83 states that:

"Planning policies and decisions should recognise and address the specific locational

and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future."

⁹ [HM Government. \(2014\). Greater Cambridge Greater Peterborough Growth Deal.](#)

¹⁰ [HM Government. \(July 2021\). Creating a Vision for the Oxford-Cambridge Arc: Consultation.](#)

Greater Cambridge Employment and Housing Need

requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

2.7 What is very clear from the NPPF therefore is the importance of enabling aspirational sustainable economic growth, particularly in areas that benefit from specific clusters that are important to the UK economy and its share in the global economy. It is also clear that when determining the scale of economic growth a plan should seek to target, it should only be limited by what can reasonably be delivered, without constraint. Environmental or social constraints might be applied later in order to achieve a pattern of sustainable development, but the starting point for formulating policy should be deliverable, objectively assessed, economic growth.

2.8 The PPG is relatively limited on how the objectively assessed employment need should be determined. At paragraph 2a-027 it suggests that following sources of data:

- *“sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand)*
- *demographically derived assessments of current and future local labour supply (labour supply techniques)*
- *analysis based on the past take-up of employment land and property and/or future property market requirements*
- *consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.”*

2.9 The paragraph ends by stating that:

“Authorities will need to take account of longer term economic cycles in assessing this data, and consider and plan for the implications of alternative economic scenarios.”

2.10 For the GCLP, employment need is calculated within the ELEDES.

2.11 The ELEDES recognises that forecasting employment is complicated, mostly due to the rapid changes seen in employment growth over the last decade compared to the decade before. As a result, there are several estimates of current employment across Greater Cambridge that cannot at this time be rationalised to form a single base to which then be used to forecast future employment need.

2.12 When published next year, the 2021 Census will assist in this and will result in much of the data on which the ELEDES is based on, from the 2011 Census onwards, being revised. In many areas these revisions will be minimal but areas that have seen substantial change, such as Greater Cambridge, are likely to see the greatest revisions. It is likely therefore that the ELEDES will require revision before the GCLP is adopted.

2.13 In essence the ELEDES relies heavily on the East of England Forecasting Model (EEFM), deviating from it only for key industrial sectors that the model is known to struggle with, namely the research and development, health and care, and professional services sectors.

2.14 The EEFM was originally designed by Oxford Economics and is currently owned by the East of England Local Government Association (EELGA). The most recent outputs of the model have been prepared by Cambridge Econometrics. These outputs are 2019 based and use the ONS 2016-based Sub National Population Projections (2016SNPP). The 2016SNPP has since been replaced by the 2018SNPP.

2.15 There have been a number of criticisms of the EEFM in recent years, most notably how the model is constrained to the 2016SNPP at the regional level. This means that any economic growth that would need a greater population than that seen in the 2016SNPP is effectively disregarded. In addition, many of the assumptions are fixed at the 2011 Census results, such as in the commuting matrix that determines residence employment, with no provision to modify these where more recent data suggest they are no longer appropriate.

2.16 Care therefore needs to be had in considering the results of the EEFM in a strategic planning context, where the NPPF requires the employment need to be unconstrained and objectively assessed.

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- 2.17 Fundamentally, since the completion of the ELEDES, the EELGA has now decided to discontinue updating the EEFM¹¹. While the reasons for this are unclear, the fact that both the original designer, Oxford Economics, and the latest operator, Cambridge Econometrics, both produce economic projections that are not constrained by population, it is likely that it is no longer considered fit for purpose.
- 2.18 Despite this, this does not mean that the EEFM should be automatically disregarded. It does provide a good indicator of how the economy may develop within the context of the assumptions included in the model. Therefore, it is reasonable to assume as a baseline that employment growth would be 40,100 jobs between 2020 and 2041 as the ELEDES sets out. However, as is recognised, this would mean that those key sectors that the EEFM struggles with would be heavily constrained.
- 2.19 To remedy this the ELEDES takes these key sectors and considers them separately. It recognises that if historical average growth rates were to be applied, future growth would be exponential. In many cases exponential growth would not matter as the real increase in employment each year would be miniscule. However, based on the rapid growth seen in recent years in these key sectors, exponential growth would quickly become undeliverable. Therefore the ELEDES, quite rightly seeks to ‘dampen down’ this growth to a more realistic level.
- 2.20 However, what is concerning is that this dampening down is based on the EEFM baseline projection –the very projection that the ELEDES acknowledges fails to adequately address growth in the key sectors in the first place. Furthermore, the ELEDES only sets out two scenarios for this dampening down:
- The Central Growth Scenario (KS2) which is the lower quartile between the EEFM baseline projection and the historic growth rate between 2001 and 2017.
 - The Higher Growth Scenario (KS3) which is the mid-point between the EEFM baseline projection and the historic growth rate between 2001 and 2017.
- 2.21 No consideration appears to have been given to a scenario using the upper quartile.
- 2.22 Fundamentally there appears to be little analysis of which quartile (which are in themselves arbitrary) might be the most appropriate beyond the assertion that the Greater Cambridge economy is at a peak and over the longer term growth will likely be lower than that seen in the past decade.
- 2.23 This fails to recognise the unique narrative behind the exceptional growth seen in the past decade.
- 2.24 The last Cambridgeshire Structure Plan and East of England Regional Spatial Strategy sought to heavily constrain development around Cambridge, in particular by limiting the amount of non-R&D floorspace that could be built. The Green Belt as well acted as a clear brake on development, preventing the expansion of Cambridge.
- 2.25 It was not until the currently adopted Cambridge City and South Cambridgeshire Local Plans started to be developed that these tight restrictions started to be loosened, in the context of the new NPPF, which promoted economic growth. Even then, many developments were affected by the 2008 recession and investment was hesitant until the plans were finally adopted in 2018. It was therefore only after 2018 that investment truly started to reflect its full potential. In the three short years since then, which have seen the Covid-19 pandemic and the realisation of Brexit, insufficient data is available to determine where in an economic cycle the Greater Cambridge economy might currently be.
- 2.26 Given that most of the data used in the ELEDES pre-dates 2018, prior to the adoption of the local plans, it is highly unlikely that it represents the peak in the Greater Cambridge economic cycle.

¹¹ <https://cambridgeshireinsight.org.uk/EEFM/>

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- 2.27 Assuming therefore that those key sectors that contribute such a significant proportion of the growth in recent years should reflect the lower quartile between the EEFM and historic growth rate is unreasonable. It would suggest that the mid-point or the upper quartile might be more appropriate, perhaps an even higher figure.
- 2.28 It is also important to not focus entirely on those key sectors. For every person working in those key sectors, there will need to be people working in other essential sectors if the local economy is to function. For example, there is little point in making specific provision for life scientists if provision is not also made for those teaching their children, serving them in the supermarket, or those building their new home.
- 2.29 The analysis in the ELEDES does not seem to recognise this 'sticky' relationship between sectors. If one sector is being uplifted from the EEFM baseline, all other sectors should also be uplifted to some degree to balance the economy.
- 2.30 At this stage, with the 2021 Census to be published early next year, it is not appropriate to provide an alternative analysis of employment need. However, it is likely that the answer is within Table 10 of the ELEDES. This shows that the lowest projected employment growth is derived from the EEFM at 40,100 jobs while the highest is from the 2011-2017 annual average change at 125,200 jobs.
- 2.31 This higher figure is likely to be too high, not least because (reflecting the NPPF) it is unlikely to be deliverable. The lowest the GCLP should be planning for is 45,761 jobs, which is linked to the Local Housing Need Standard Method (LHNSM), rather than the EEFM 40,100 jobs.
- 2.32 Realistically, employment need is likely to be the average between the 2001-2017 annual average change and 2011-2017 annual average change, 90,250 jobs. This closely reflects the CPEIR proxy result of 92,100 jobs. This would seem to best fit the requirements of the NPPF by reflecting an unconstrained view of employment growth while recognising what is realistically deliverable.

3 Housing Need

3.1 As set out in chapter one, the NPPF's social objective set out in paragraph 8 is to:

“support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;”

3.2 Housing is central to the NPPF and is referenced more than any other use. As set out in paragraph 60:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

3.3 To this end, the Government has introduced the Local Housing Need Standard Method (LHNSM) in paragraph 61 of the NPPF to determine the minimum number of homes that strategic planning policies should plan for. However, LHNSM is not the objectively assessed need for housing, which is the minimum amount of housing strategic policies should seek to achieve, as clearly set out in NPPF paragraph 11. It is therefore incumbent on a strategic plan-maker to determine if the objectively assessed need is higher or lower than the LHNSM. If the objectively assessed need is lower than the LHNSM, the LHNSM takes precedence and the objectively assessed need becomes largely irrelevant. If the objectively assessed need is higher than the LHNSM, the objectively assessed need takes precedence and the LHNSM becomes entirely irrelevant as it is a simple policy tool.

3.4 Paragraph 2a-010 of the PPG explains the circumstances where the objectively assessed need for housing is likely to be higher than the LHNSM, which does not:

“predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour”.

3.5 The paragraph then provides some examples of circumstances where this might be appropriate such as growth strategies, strategic infrastructure improvements or unmet needs from neighbouring authority (the latter is not relevant in this case). The paragraph then notes that there might be other evidence to suggest significantly greater levels of housing need, such as Strategic Housing Market Assessments (SHMAs).

3.6 In the case of Greater Cambridge, the ELEDES clearly sets out the employment need would require more housing than suggested by the LHNSM. Therefore the LHNSM is no longer relevant and no further consideration is given to it in this report.

3.7 The HER report takes the two employment need scenarios set out in the ELEDES, as discussed in the previous chapter, and converts the number of jobs into homes.

3.8 To do this the HER needs to first determine the baseline resident population. In Cambridge, this has always been an issue given its substantial student population and yet the HER analysis seems to misunderstand this. While the report does identify that the differences between official population estimates and the much higher estimates for the patient register are most likely due to students, it dismisses the patient register on the basis that too few dwellings have been delivered since 2011 to accommodate that population rise.

3.9 There are two issues with this. First, using dwellings as the measure ignores student housing entirely, which will have supported a considerable population. Second, where students are occupying market housing, they tend to do so at far greater densities (people per household) than families.

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- 3.10 In terms of the first point, the Housing Land Supply report¹² identifies that 1,112 dwellings were completed in Cambridge in 2017/18 and 868 dwellings in 2018/19. However the Housing Delivery Test (HDT) results suggest that the number of homes delivered, which includes communal establishments, was 1,145 and 1,098 respectively. This alone suggests 13% more homes than dwellings alone.
- 3.11 Rather than just blending the two sources of population data, it would be better to provide scenarios considering the implications of using the official estimates, the patient register and different blends of the two. This would allow the reader to understand the sensitivities involved.
- 3.12 Other economic variables such as unemployment rates, economic activity rates and double-jobbing are considered appropriate. The one exception however is the commuting ratio applied.
- 3.13 It is welcome that the GCSLT have selected the 1:1 commuting scenario as the housing requirement to pursue. However, it is concerning that this 1:1 only relates to jobs in excess of those supported by housing equivalent to the LHNSM result using the 2011 Census ratio. As discussed above, the LHNSM is purely a policy tool for determining the minimum number of homes LPAs should seek to plan for. Its inaccuracies are well documented and there is no valid reason to include it in any form in a more comprehensive analysis of housing need.
- 3.14 As such, the modelling should be revised to consider the implications of a 1:1 commuting scenario on all jobs to be delivered by the GCLP. In addition, it would be appropriate to consider the implications of a further uplift in housing to remedy the rise in in-commuting as a result of the adopted local plans failing to provide sufficient housing for the actual growth in employment. This has led to housing pressures in surrounding areas that were not planned for and would perpetuate a pattern of unsustainable commuting unless addressed.
- 3.15 As discussed in the Development Strategy Topic Paper, the actual level of 44,400 homes pursued in the GCLP first proposals consultation is linked entirely to the selected employment need. If the employment need was deemed to be higher, the housing need would be higher too. This is entirely appropriate but highlights how fundamental it is to ensure the correct employment need is selected to avoid a repeat of the increased in-commuting seen as a result of proposals largely facilitated by the currently adopted local plans.
- 3.16 However, there also appears to be confusion by what is actually meant by 'homes' (referred to in the Topic Paper and GCLP first proposals) and 'dwellings' (referred to in the HER). As discussed above, the two are not the same.
- 3.17 In determining the household formation rates, the HER would have first discounted an amount of the population each year that would live in communal establishments such as student accommodation and care homes. For most age groups this is a fixed number of people living in communal establishments with the exception of those aged 75+ where the percentage of the population aged 75+ that lived in communal establishments is used. In both circumstances the data is taken from the 2011 Census and is assumed to remain fixed up until the base date of the projection (in this case 2020) through to the end of the projection.
- 3.18 In the case of the HER, it is clear that a considerable number of homes in communal establishments were delivered in 2017/18 and 2018/19, and it is highly likely that similar numbers were delivered each year since 2011. Therefore the starting assumptions for the base date are likely to be incorrect and this is likely to have influenced the household formation rates used.
- 3.19 Furthermore, because the number of people of an age that are likely to be students remains fixed, the projections cannot consider any additional need for student accommodation.

¹² GCSPT. (April 2020). Greater Cambridge Housing Trajectory and Five Year Housing Land Supply.

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- 3.20 It is complex to model this within the projections and instead this additional growth is usually determined in consultation with the universities to take account of their specific plans for expansion. This doesn't appear to have happened, which is surprising given that Greater Cambridge has one of the greatest concentrations of students relative to the size of its resident population.
- 3.21 Consequently, the housing requirement of 44,400 must be dwellings only because it does not include any consideration of communal establishments of any kind.

4 Sustainability Appraisal

- 4.1 Sustainability Appraisals are required to incorporate the statutorily required Strategic Environmental Assessments (SEAs) of policies and plans. As part of this, there is a requirement for reasonable alternatives to be considered on a like-for-like basis, allowing the reader to compare the environmental effects and wider sustainability issues associated with different development scenarios.
- 4.2 The quantum of development is but one area that logically should be subject to reasonable alternatives, particularly where the evidence base (both the ELEDES and HER) set out a series of scenarios for the decision maker (in this case the GTSPT) to consider before selecting the most appropriate as a matter of planning judgement. It is surprising therefore that the SA accompanying the GCLP first proposals fails to identify any reasonable alternatives relating to the quantum of development.
- 4.3 The reasons given for this are self-defeating. Two potential alternative options are considered before being discounted:

“B. Alternative option - Planning for the higher jobs forecast and level of homes associated with it. This alternative has not been assessed as it is not considered to be reasonable. This is because the higher jobs forecast could be possible, but is not the most likely future scenario. As such we do not consider that it represents our objectively assessed need, and would therefore not be a reasonable alternative.

C. Alternative option - Planning for the government’s standard method local housing need figure. This alternative has not been assessed as it is not considered to be reasonable. This is because it would not support the most likely forecast for future jobs. As such, the Councils do not consider that it represents our objectively assessed need, and would therefore not be a reasonable alternative. Failure to reflect that likely level of growth, would lead to increased commuting into the area (with consequent impacts on

quality of life, wellbeing and carbon emissions objectives for the plan).”

- 4.4 It is agreed that Option C would not be reasonable given the overwhelming evidence that both employment and housing need are far greater than yielded from the LHNSM. That is not to say that a lower level of growth than the preferred option (Option A, the 44,400 homes and 58,500 new jobs set out in the first consultation) would be unreasonable and certainly, it would likely be helpful in teasing out the relative sustainability issues related to the quantum of development.
- 4.5 The justification for discounting Option B however is clearly erroneous. If it was only necessary to assess the “most likely future scenario”, there would be no assessment of alternatives of any kind. This is contrary to the entire purpose of SA and SEA.
- 4.6 The ELEDES makes clear that, while it concludes that the Central Growth Scenario (58,500 jobs) is the most likely, the Higher Growth Scenario is entirely possible. Indeed, as set out in this report it is entirely plausible and therefore reasonable.
- 4.7 To withhold the full assessment of Option B alongside Option A effectively blinds the decision maker to the differences in environmental effect and sustainability between them. The decision maker cannot conclude that the possibility of success of Option B outweighs or reduces the environmental impact relative to Option A.
- 4.8 This approach has been noted as a concern during the examination of the Babergh and Mid Suffolk Joint Local Plan¹³, which has been suspended pending further work by the Councils.

¹³ [Stemp, S. & Osmund-Smith, T. \(September 2021\). In the Matter of the Babergh and Mid Suffolk Joint Local Plan: Opinion Concerning the Sustainability Appraisal.](#)

5 Conclusions and Recommendations

- 5.1 The objective assessments of employment and housing need supporting the GCLP first proposals consultation are substantial. They thoroughly consider the data complexities resulting from the rapid economic growth following the period of restraint demanded by the previous County Structure Plan. The employment need assessment in particular however considers that this rapid growth is unsustainable in the long term, and would likely fall back to an average rate of growth seen in the early 2000s, before proposals in the currently adopted local plans took shape.
- 5.2 Bidwells believe that this undermines the Cambridge Phenomenon that has been gathering pace since the 1960s, but is only now starting to convert the academic advances in life sciences into commercial success, a result of those local plans adopted in 2018. It suggests that the possibility that growth can be sustained is not worth considering and instead Greater Cambridge should be planning for a level of growth comparable to other areas that do not have a unique life sciences cluster, which contributes £2.9 billion annually to the UK economy.
- 5.3 This is happening at a time when the Covid-19 pandemic has highlighted the importance of all aspects of life science research, from rapidly developing a vaccine, designing effective equipment for rapidly increasing the number of intensive care beds, through to caring for those suffering the long term effects. It is also happening at a time when, following Brexit, the UK is seeking to determine its place in the global economy, outside of the EU.
- 5.4 While the UK has a lot to offer, the life science research undertaken in Cambridge, and across the whole Oxford to Cambridge Arc, is one of the most unique and highly valued. Now is not the time to constrain growth simply because it 'might' be less than what has been sustained previously.
- 5.5 Bidwells acknowledge that economic growth must be sustainable and that it would be inappropriate to determine a level of need that is undeliverable, as advocated by the NPPF. It is also acknowledged that it is difficult to determine exactly how much employment need there is in the context of such a vibrant economy. It is unique and therefore the approach to assessing need set out in the PPG is perhaps not the best. Certainly, extra care is needed when considering the veracity of economic models, such as the EEFM, that have consistently downplayed economic growth from key sectors over several iterations in recent years. It might therefore be more appropriate, at least as a reasonable alternative, to reverse the analysis and instead consider the available capacity for growth in the area and determine how this sits with the various economic projections under consideration.
- 5.6 On the subject of reasonable alternatives, the SA accompanying the GCLP first proposals consultation fails to even consider the potential effects of a higher level of economic growth. This is clearly unreasonable, the evidence base itself highlights the uncertainty as to the level of employment need and identifies methodologies and scenarios that would result in a considerably higher level of employment need than the first proposals suggest.
- 5.7 Lessons must be learnt from the currently adopted local plans that did not anticipate the rapidity of growth they would facilitate, which would inevitably lead to far greater growth over their full plan periods than was considered in their accompanying SAs. It is this failure to consider the possibility of higher rates of economic growth that has led to the increasing level of commuting into Greater Cambridge each day.
- 5.8 Finally, in terms of housing need, in the case of Greater Cambridge this is simply a function of facilitating economic growth and determining the acceptable level of commuting. The latter will inevitably be a strategic matter for the purposes of the Duty to Cooperate unless the GCLP can show that it is accommodating its full objectively assessed housing need.

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- 5.9 At this stage, with such considerable uncertainty regarding the level of employment need, it is certainly the case that housing need is far higher than that set out in the first proposals consultation and therefore either more land needs to be allocated for housing or comprehensive discussions should be had with neighbouring authorities about how unmet need should be addressed. To facilitate these discussions, the GCSPT would first need to show that there were no more additional sustainable locations for development within their boundaries, which, given the considerable number of sites that are currently being promoted for development is highly unlikely.
- 5.10 Again, the SA fails to consider any alternative other than the level of need set out in the GCLP first proposals consultation. Quite clearly, if there is uncertainty about the level of employment need, there is also uncertainty about the level of housing need, and the SA should reflect that. Equally, in its consideration of reasonable alternatives, the SA fails to recognise that the greater in-commuting resulting from a higher employment need would be negated by increased housing. Its reasons for limiting the assessment of reasonable alternatives are self-defeating.
- 5.11 In terms of recommendations, it is clear that considerably more analysis is required to determine the most appropriate level of employment need in the context of the unique life science cluster in Greater Cambridge, which will in turn determine the housing need. This work cannot reasonably progress until the 2021 Census is published in early 2022 and much of the data post-2011, on which the GCLP first proposals is based, is revised. In the meantime however, the GCSPT could consider the realistic capacity for development within its boundaries – what could be achievable irrespective of need, based on the environmental and social constraints of the area. This work will be essential to determining if any unmet housing and/or employment needs exist for the purposes of the Duty to Cooperate, determining the level of employment and housing need that is actually deliverable, and convincing future government planning inspector(s) that the GCLP has been positively planned in the context of the significant weight the NPPF places on the need to support economic growth and productivity.



BIDWELLS