

Greater Cambridge Local Plan The First Proposals (Reg 18)

Representations on behalf of
L&Q Estates Limited and Hill Residential Limited

December 2021

**Greater Cambridge Local Plan
The First Proposals (Reg 18) 2021**

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Executive Summary

In our representations to the Greater Cambridge Local Plan First Proposals, we set out our support for the seven main aims for the Local Plan that focus on: climate change, biodiversity and green space, wellbeing and social inclusion, great places, jobs, homes and infrastructure.

Cambridge has a particular role in pulling the country out of the Covid-19 recession and creating the science-based economy that ministers talk about, which is why it is important to plan for the right level of growth. Currently, the draft Local Plan does not go far enough to factor in the more optimistic/aspirational growth scenarios for the area, especially when considering the ability for transformational infrastructure improvements to unlock growth in the area and create more favourable conditions for its economy, environment and communities to flourish.

The Councils' proposed development strategy relies heavily on development in and around Cambridge's urban area, as well as existing new settlements for the majority of its housing supply. The dependency that is placed on a handful of strategic sites to deliver this housing is problematic in that it creates an inflexible development strategy that is unable to respond to faster/higher growth rates. It provides little contingency if any of the sites are stalled or slow to build out and does little to distribute growth to meet the needs of the wider area – particularly towards the eastern side of the plan area.

This strongly suggests that the Councils current objectively assessed need is far below the potential growth scenarios for the area and, therefore, the proposed development strategy will need to plan for further strategic site allocations. Our promoted site at Westley Green (Six Mile Bottom, Site No. 40078) offers a significant opportunity to help plug the gap in the development strategy and ensure growth can be directed to a sustainable location and delivered at scale to meet the local plan objectives.

Westley Green is the collective vision of L&Q Estates and Hill Developments for the Six Mile Bottom Estate, approximately 8 miles to the east of Cambridge. The emerging vision is about establishing a long-term strategic approach to accommodating growth in a highly sustainable location with an ability through its scale and location to embrace the grand challenges of the future.

The new settlement will deliver significant growth over the next 35-40 years on a significant landholding. It is exceptionally situated on the infrastructure confluence that connects Cambridge with the three key strategic economic corridors to Norwich, Oxford and London, and consequently a short travel distance to the various Cambridge Science Parks and the City centre.

Westley Green will become a unique place of high quality, innovative, net zero carbon living and working, set amongst significant swaths of green space that allows its residents to live healthy, sociable and community focused lives whilst working at home, locally or at the nearby world leading employment destinations.

Westley Green will serve businesses in Greater Cambridge with a long-term affordable supply of homes, talent and employment space, that will instil confidence to invest in the area for the future.

Our vision for Westley Green is supported by several documents setting out the unique opportunities presented by Westley Green for the Greater Cambridge region. These include the following: Westley Green Strategic Case For Development, Sustainable Transport and Connectivity Strategy, Housing and Employment Forecasts for Greater Cambridge, Climate Change Strategy and Health and Wellbeing Strategy.

1.0 INTRODUCTION

- 1.1 These representations are made on behalf of L&Q Estates Limited and Hill Residential Limited in relation to their interests at land at Six Mile Bottom (hereafter referred to as 'Westley Green') and set out comments in response to the Greater Cambridge Local Plan – The First Proposals – Reg 18 consultation.

- 1.2 These representations should be read alongside Barton Willmore's Housing and Employment Forecasts for Greater Cambridge (**Appendix 1**). This includes a detailed review of Greater Cambridge's housing and employment needs and the corresponding implications for the emerging Greater Cambridge Local Plan. Several key findings are made within this study in relation to the growth strategy for Greater Cambridge and the wider sub-region, and the strategic role of Westley Green (Call for Sites no. 40078), a c.8,500 home and employment new settlement at Six Mile Bottom, 8 miles east of Cambridge and 6 miles south west of Newmarket.

2.0 REPRESENTATIONS TO THE GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS

Vision and Aims

- 2.1 We support the seven main aims for the Local Plan that focus on: climate change, biodiversity and green space, wellbeing and social inclusion, great places, jobs, homes and infrastructure.

How much development, and where – general comments

- 2.2 We agree that development should be sustainable and mitigate climate impacts. However, we have strong concerns that the level of growth forecasted and the supply of homes proposed is not high enough. If not planned for, this will cause high levels of in-commuting to the area contributing to congestion, poor air quality, adverse climate impacts, poor housing choice and affordability and rising business costs.
- 2.3 Cambridge has a strong and nationally important economy with fast job growth experienced over recent years that is not reflected in the Government's Standard Method. The Councils' proposed development strategy relies heavily on development in and around Cambridge's urban area, as well as existing new settlements for the majority of its housing supply. The dependency that is placed on a handful of strategic sites to deliver this housing is problematic in that it creates an inflexible development strategy that is unable to respond to faster/higher growth rates. It provides little contingency if any of the sites are stalled or slow to build out and does little to distribute growth to meet the needs of the wider area – particularly towards the eastern side of the plan area.

Policy S/JH: New jobs and homes

- 2.4 The proposed Local Plan sets an objectively assessed need of 58,500 jobs and 44,400 homes during 2020-2041. This is based on the Councils' medium+ growth scenario of homes and jobs. The maximum growth scenario of 78,700 jobs and 56,500 homes was discounted on the basis that this did not reflect the most likely level of new jobs when factoring in long term patterns of employment. However, at paragraph 5.22, the Councils' Employment Land and Economic Development Evidence Study recommends a preferred range 'between a central and higher growth scenario' rather than just the 'central growth scenario'.

2.5 The Plan briefly discusses the link between homes and jobs (pages 25-26) and identifies paragraph 81 of the NPPF which requires plans to support economic growth and productivity. Expanding on this, it is important to emphasise the detail of paragraph 81 which reads as follows

*"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 innovation, and in areas with high levels of productivity**, which should be able to capitalise on their performance and potential."* (Our emphasis).

2.6 The 'Planning for sustainable growth in the Oxford-Cambridge Arc' document (February 2021) states "Oxford and Cambridge are world-leading centres of research and innovation" and identifies how "Cambridge's rate of patent applications – a key indicator of innovation – is the highest in the UK, at over 12 times the national average." The document also notes how the Arc was fundamental in the development of the COVID-19 vaccine. Paragraph 81 of the NPPF therefore applies to Greater Cambridge more than most locations in the country.

2.7 Paragraph 82 of the NPPF expands on Paragraph 81, stating how planning policies should "seek to address potential barriers to investment, such as inadequate infrastructure, services or **housing**, or a poor environment." Research by Cambridge Ahead reveals a positive picture of employment growth over the last six years, which has been particularly strong among knowledge-intensive companies. This growth rate has slowed in more recent years and there are warnings that start-ups and companies outside knowledge-intensive sectors may be finding conditions in the city less attractive with the rising costs of doing business in Cambridge and lack of affordable housing and adequate transport infrastructure.

2.8 This does not appear to have been picked up in the Councils' evidence base and is an important reminder that the success of the Cambridge Phenomenon cannot be taken for granted.

2.9 Cambridge has a particular role in pulling the country out of the Covid-19 recession and creating the science-based economy that is central to ministers' strategy for the UK economy post-Brexit, which is why it is important to plan for the right level of growth. Currently, the draft Local Plan does not go far enough to factor in the more optimistic/aspirational growth scenarios for the area, especially when considering the ability for transformational infrastructure improvements to unlock growth in the area and

create more favourable conditions for its economy, environment and communities to flourish.

- 2.10 As set out in our accompanying 'Housing and Employment Forecasts for Greater Cambridge' the Greater Cambridge First Proposals document plans to take forward the 'Central' growth scenario, based on employment growth of 58,500 jobs 2020-2041, at an average annual growth rate of 1.1%. However, the CPIER report identified that Cambridge and South Cambridgeshire Districts experienced average annual employment growth of **2.4%** and **2.3%** respectively according to Office for National Statistics data, between 2010 and 2016. The CPIER report states *that: "by studying the global employment of all companies based in our area, we come to the conclusion that this is higher still"*¹. The CPIER report goes on to explain how they have created a 'blended rate' of employment growth, which combines employment growth rate data for the corporate sectors where we have the most knowledge, and the ONS growth rates where we are less confident (for instance, in relation to retailing and the public sector employment)."
- 2.11 This approach by CPIER results in an annual employment growth rate for Cambridge which is the same as the ONS rate (2.4%), but a significantly higher rate (4.2%) is calculated for South Cambridgeshire.
- 2.12 Both authorities of Greater Cambridge experienced a growth rate **over 1% higher** between 2010 and 2016 than the employment growth which is relied on in the Greater Cambridge First Proposals document. Even if the Greater Cambridge Plan First Proposals was to be underpinned by the 'Higher Growth' scenario, the job growth associated with the scenario (1.5%), would still be nearly **1% below** the minimum for South Cambridgeshire since 2010 (2.4% - 4.2%) and nearly 1% lower than that for Cambridge (2.4%).
- 2.13 Barton Willmore have compared this growth with the employment growth data published by Oxford Economics (October 2021) for Cambridge City and South Cambridge. Taking the two authorities together (Greater Cambridge), the growth from 1991 to 2020 has averaged 2.2% per annum. Between 2010 and 2020 the growth rate was 2.6%. These forecasts consider the effect of COVID-19.
- 2.14 In this context it is considered that the higher growth scenarios for 2020-2041, as set out in Table 4.1 of the Greater Cambridge Employment Land and Economic Development

¹ Page 44, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

Study, are achievable - particularly in the context of Greater Cambridge's role in the economic growth of the Oxford-Cambridge Arc and the Innovation Corridors. These are as follows:

- 'Higher Growth' (78,700 job change),
- 'CPIER proxy' (92,100 job change)
- '2011-2017 average annual change' (125,000 job change)

2.15 The highest employment growth rate considered in the Council's evidence base is 2.1%, generating 125,200 jobs 2020-2041. This is **over double** the number of jobs underpinning the Greater Cambridge Plan First Proposals (58,500 jobs 2020-2040) but still remains 0.7% lower than the annual growth needed to double GVA. As a result, the chosen medium+ growth scenario falls significantly short of the growth potential of the area and fails to align with the Councils' own aim of doubling GVA by 2042 through the Cambridge and Peterborough Devolution Deal and accompanying £500m investment in infrastructure.

2.16 This strongly suggests that the Councils current objectively assessed need is far below the potential growth scenarios for the area and, therefore, the proposed development strategy will need to plan for further strategic site allocations.

2.17 Our promoted site at Westley Green (Six Mile Bottom, Site No. 40078) offers a significant opportunity to help plug the gap in the development strategy and ensure growth can be directed to a sustainable location and delivered at scale to meet the local plan objectives. For full details on this opportunity, please see the accompanying documents:

- Westley Green Strategic Case For Development
- Housing and Employment Forecasts for Greater Cambridge
- Sustainable Transport and Connectivity Strategy
- Health and Wellbeing Strategy
- Climate Change Strategy

Policy S/DS: Development strategy

2.18 The additional housing need set out in the Development Strategy is 11,640 homes, which we argue is not sufficient to meet the growth aspirations of the area and the levels of employment growth expected over the next 20 years.

- 2.19 Delivery of these additional homes and employment land is concentrated mostly at Cambourne and within Cambridge at high density urban districts at North East Cambridge, Cambridge Airport and Eddington. Our first concern with this approach is that development strategy does not provide a wide range of homes and jobs and is heavily reliant on commuting to Cambridge and high density living environments and risks not meeting the needs for all, for example for family housing.
- 2.20 The pandemic has shown that high density living and a lack of access to green spaces can produce negative health and wellbeing effects. There is a role that higher density, urban development's play in meeting certain housing needs but thought also needs to be given to development of new communities on sites that: facilitate greater space for people; provide a greater variety of housing; increase affordability for those unable to afford urban prices; and provide opportunities to connect with the surrounding countryside to improve mental and physical health.
- 2.21 Our second concern is that the development strategy is also not diverse or flexible enough to respond to changing circumstances. It is too reliant on development within Cambridge and existing new settlements and employment clusters to deliver the area's growth needs, rather than redistributing growth to the wider area, such as the east of the plan area and offering up opportunities to widen the economic base and provide a greater mix of housing locations and prices. With so much focus on city development, we question how affordable such developments are likely to be given house prices are currently 12 times people's annual earnings in Cambridge. With the cost of remediation and redevelopment of brownfield sites like NEC, and the infrastructure burden, we expect affordable housing levels will struggle to reach 40%, which will compound the problem.
- 2.22 Thirdly, major development, for example delivery at NEC and 'Additional Cambourne' brings with it uncertainty over the timing and relocation of existing uses or major infrastructure delivery such as East West Rail. In the case of NEC and Additional Cambourne, there is reliance on other consenting processes which in itself adds greater risk and uncertainty to the deliverability of the plan. Should commencement at these large sites be delayed this will have a knock on impact on housing supply – especially from the mid-term of the planned housing trajectory onwards. There is little opportunity in the development strategy to plug this gap in supply should it arise or should employment growth be higher than expected. As a result, there is a need for more resilient housing delivery strategy with further allocations, both small and large, added to the development strategy.
- 2.23 One of the most effective ways at reducing carbon emissions and improving air quality is to direct development towards large scale new settlements that generate high levels of

self-containment and can secure internalisation of trips. There is little evidence that travel behaviour in Cambourne will shift significantly with the delivery of a railway station given the small take up of employment units in its business park and limited high street offer. The location and its high percentage of out-commuting by car is likely to continue with the lack of business interest and therefore alternative strategic growth locations should be considered that provide a much stronger employment offer and investment opportunity.

- 2.24 Seeking biodiversity net gain beyond 10% will prove very challenging on existing sites/commitments (especially where a 10% net gain was not factored in at Local Plan testing stage) and the current planned high density urban developments in the city. In order to achieve the objective of doubling nature in future, the Council will need to look for large scale growth locations where it may be possible to achieve more significant levels of biodiversity net gain through comprehensive rewilding proposals and ecological enhancements.
- 2.25 In terms of the key constraints to the development strategy, it is clear that strategic water supply infrastructure will be required to meet longer term needs, and to protect the integrity of the chalk aquifer south of Cambridge.
- 2.26 Under circumstances where it would not be possible to demonstrate that there is a reasonable prospect that the full development needs can be delivered by 2041, the Councils would have to discuss with neighbours the potential for them to meet that element of need under the duty to cooperate.
- 2.27 The new Local Plan should also consider whether there are strategic site allocations elsewhere in the plan area that will benefit from new planned investment in water infrastructure. Provision is currently being made for a new pipeline connecting water supplies from the north of Lincolnshire to the Colchester area of Essex, which includes supply to the eastern part of Greater Cambridge near Six Mile Bottom. This £500 million scheme will be delivered by 2025 (early on in the Local Plan period) and will allow water to be moved from areas where it is more plentiful to areas of scarcity across the region.
- 2.28 The development strategy acknowledges the need to support the major business parks and world-leading facilities in the rural southern cluster and in doing so allocates 160 homes between two sites in Duxford and Great Shelford. This is argued to support more sustainable travel movements, locating homes and jobs close to each other served by good quality public transport, cycling and walking links. However, the level of job creation at some of these major employment areas is far in excess of these housing allocations and underestimates the level of supporting housing needed on the south eastern side of

the plan area. For instance, the Babraham Research Campus will receive a 17.1ha enlargement via land removed from the Green Belt, and the new Genome Campus' will receive 150,000m² of new research and translation floorspace creating significant employment growth. To create the right conditions for sustainable travel movement, the development strategy needs to revise its focus away from the western A428 corridor of Cambridge to the east where strategic growth locations like Six Mile Bottom can create a more sustainable pattern of development linked to good transport links and a more proportionate provision of housing and employment provision.

Cambridge Urban Area

Policy S/NEC: North East Cambridge

- 2.29 We have concerns regarding the quantum of development proposed in this policy, which comprises 8,350 new homes and 15,000 additional jobs.
- 2.30 Given the vast majority of these homes are to be provided on the eastern part of the Action Area, we are concerned that such a strategic-scale housing allocation should be focused on such a relatively small and highly constrained site.
- 2.31 The policy also requires a wide range of necessary infrastructure to support the development including new schools, community and cultural facilities, open spaces as well as enhanced and new walking and cycling connections.
- 2.32 The quantum of residential development proposed is comparable to strategic sites such as Cambourne, Northstowe and Waterbeach but relies on much higher densities and heights that are unprecedented in the Cambridge area. This gives rise to significant challenges in terms of townscape impacts but also the site's ability to deliver sustainable development given the limited land available to accommodate key infrastructure such as sustainable drainage systems, open space, sports and mitigating transport measures. It is also highly likely that the provision of 20% on site biodiversity net gain, as required under the new plan policies, will be unachievable and consequently will be dependent on off-site land acquisition or biodiversity credits.
- 2.33 We are of the view that the quantum of development is far too high for the size of the area allocated for housing and the various site constraints. Furthermore, the remediation of the site and DCO process is likely to negatively impact on delivery timescales and affordable housing provision.

New Settlements

Policy S/CB: Cambourne

- 2.34 The draft policy proposes 1,950 additional homes at Cambourne linked to the development of the new East West railway station. We question how this site will be specifically allocated in the Local Plan given the potential delays to the East West rail project? There is currently no clarity from government on whether the full route will be funded following the Budget. Furthermore, there is no mention in the S/CB Policy commentary of consultation with the East West Rail Company or comfort around their timetable for delivery. In the absence of this and potential delay to approval of the both the routing of the railway and the new station, the Local Plan should look elsewhere in the plan area for a strategic growth location that can deliver more readily without dependency on upfront major infrastructure delivery.
- 2.35 The assumed commencement of Cambourne in 2032/33 in the Councils' trajectory is currently baseless unless there is more certainty around the timetable for delivery of East West Rail and the location of the new station. At the same time, any proposed timetable for delivery of the new railway is highly likely to face several legal challenges and setbacks following the environmental concerns raised during recent public consultation. Previous Government "commitments" to the East West Expressway and parts of HS2 have fallen by the wayside and there can be no certainty at all in East West rail.

Policy S/NS: Existing new settlements

- 2.36 The draft policy assumes that annual delivery rates at Northstowe and Waterbeach will be higher than so far relied on, meaning that more of the planned homes will be completed in the plan period, with less to follow after 2041.
- 2.37 As a result, the build out rates in the housing trajectory increase from 250 units per annum to 300. For Waterbeach in particular, we question whether the required infrastructure is able to keep pace with these increased delivery rates especially as there is a trip budget cap on the first 1600 homes of Waterbeach West and the first 800 homes of Waterbeach East. Once these thresholds are met, it is highly likely that the dualling of the A10 will be required to unlock further development. The dualling outline business case is due at the Combined Authority committee in Jan/Feb 2023 and at present has no certainty over build programme. Similar concerns exist in terms of wastewater infrastructure delivery and the relocation of Milton Sewage Works.

Rural Southern Cluster

2.38 We have responded to the issues raised in the HELAA rejected Site No. 40078 (Six Mile Bottom) and set out how this site will meet the objectives of the Local Plan through the following accompanying documents:

- Westley Green Strategic Case For Development
- Housing and Employment Forecasts for Greater Cambridge
- Sustainable Transport and Connectivity Strategy
- Health and Wellbeing Strategy
- Climate Change Strategy

Biodiversity and Green Spaces

BG/BG: Biodiversity and geodiversity

2.39 The need for biodiversity net gain (BNG) is supported but we have concerns that the proposed 20% net gain requirement has not been fully tested in the Council's development viability appraisal. The First Proposals Viability Report assumes separate costs for greenfield and brownfield developments that will deliver 20% BNG on site. However, there will be several sites that cannot achieve this level of net gain on site and will require higher cost assumptions for off-site delivery. It is also not clear how the report has costed off-site delivery S106 contributions.

2.40 Further evidence is required as to how the Councils' have assessed the costs and impacts of their proposed approach particularly as the requirement for 20% BNG will reduce gross development value and in some cases impact on site viability and deliverability. Please see our previous comments on this issue in response to the Councils' draft Biodiversity SPD consultation of September this year.

Supporting Documents

Sustainability Appraisal

2.41 The SA process has been undertaken in a comprehensive manner. However, there are areas that would benefit from additional consideration and clarity as the Plan progresses. Areas for improvement include:

- i. Confirmation of why updates to policy and Government strategy do not require alterations to the Sustainability Framework, particularly in light of the increased focus on climate change in the NPPF 2021 and the Net Zero Strategy 2021;
- ii. Baseline data should reflect the latest available datasets. This is particularly important for health and wellbeing and the economy given the COVID-19 pandemic;
- iii. Further clarification on how mitigation measures including assumptions around transport infrastructure have been factored in to scoring the reasonable alternatives. This limitation is noted in the appraisal but it is not clear how the scoring is equitable between sites/growth options as a result;
- iv. For climate change mitigation, consideration of whole life carbon in developments, ecosystem services and reduction in travel should all be considered alongside the “hard” measures focused on energy efficiency in buildings and low carbon energy sources (for which a level playing field will be created by the Future Homes Standard and update to the Building Regulations).

2.42 Please see the attached Sustainability Appraisal Compliance Review (Appendix 2) for further assessment of the above.

APPENDIX 1

Barton Willmore

**Housing and Employment Forecast
Review – Greater Cambridge, 2021**

HOUSING AND EMPLOYMENT FORECASTS FOR GREATER CAMBRIDGE

Prepared on behalf of:

L&Q Estates Limited and Hill Residential Limited

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HOUSING AND EMPLOYMENT FORECASTS FOR GREATER CAMBRIDGE

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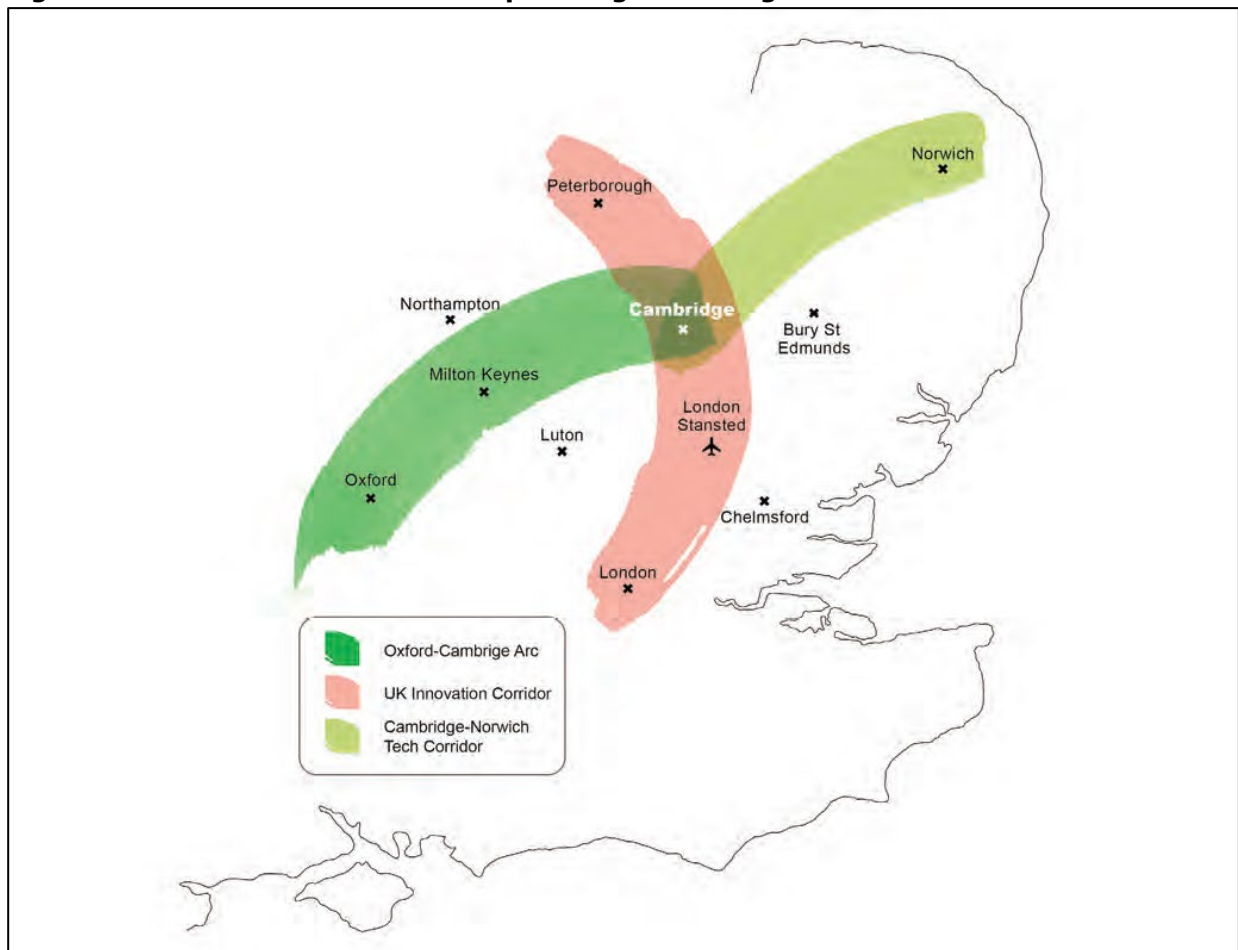
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1.0 INTRODUCTION

1.1 This Technical Report has been prepared by Barton Willmore’s National Development Economics team in response to the consultation of the Greater Cambridge Local Plan First Proposals document. Its purpose is to review the evidence base and relevant publications for the Greater Cambridge Local Plan to determine what level of economic growth should be planned for in the sub-region and reflected in the Councils’ development strategy.

1.2 As Figure 1.1 illustrates, Cambridge is at the centre of three nationally recognised economic corridors, including the Oxford-Cambridge Arc. The Oxford-Cambridge Arc is supported by Central Government who have identified it as a ‘key economic priority’¹ for the country. Separately the Cambridge and Peterborough Devolution Deal aims to double GVA in the area over 25 years.²

Figure 1.1: Growth corridors incorporating Cambridge



¹ Page 7, The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners, 2019

² Page 3, Cambridge and Peterborough Devolution Deal, 2017

- 1.3 The aspirations for economic growth in the area where Greater Cambridge is located are therefore significant and of international significance as we set out in this report. It is therefore imperative that Development Plans such as the Greater Cambridge First Proposals Plan are underpinned by robust assumptions of economic growth and housing need.
- 1.4 Westley Green is located eight miles east of Cambridge and straddles the local authority boundaries of South Cambridgeshire and East Cambridgeshire Districts. Due to this location, Westley Green is in a prime location for contributing to the economic growth objectives associated with all three economic corridors illustrated in Figure 1.1 by providing significant levels of on-site employment. Westley Green will also provide much needed housing to support on-site and off-site employment, contributing to sustainability objectives.
- 1.5 The proposals for Westley Green are in the early stages of development, however the site has been submitted as part of the Greater Cambridge Plan's Call for Sites. In this context the Technical Report presented here emphasises the role that Westley Green can have in meeting national, regional, and local objectives for growth and is structured as follows:
- **Chapter 2:** Summary of relevant national policy relating to growth in the sub region and wider region;
 - **Chapter 3:** The Greater Cambridge Plan; a summary of the Greater Cambridge Plan's progress to date, focussing on the economic aspirations of the Greater Cambridge Plan and the levels of housing need proposed in the evidence base of the Plan to achieve these economic growth aspirations both in Greater Cambridge and the wider region;
 - **Chapter 4:** Evidence base review; a review of the existing evidence base for the Greater Cambridge Plan and other publications to determine whether a gap exists between the growth being planned for (employment and financial indicators such as GVA) and the economic potential of the sub region. This includes documents such as the Housing Delivery Strategy, Housing and Employment Relationships Report, Employment Land and Economic Development Study, and Strategic spatial options appraisal (amongst others);
 - **Chapter 5:** Summary and Conclusions.

2.0 SUMMARY OF RELEVANT NATIONAL POLICY AND SUPPORT FOR GROWTH

i) Introduction

- 2.1 As we outlined in the introduction to this Technical Report, Cambridge and Westley Green are located at the crossroads of three economic growth corridors. Some of these growth corridors have support from national Government and are vital in achieving the economic growth aspirations of the country.
- 2.2 This importance is emphasised by the Government's City Deal for Greater Cambridge, the introduction for which states "*Greater Cambridge competes on a **global stage** and is a gateway for high-tech investment into the UK. It is also the **innovation capital** of the country, with more patents per 100,000 population than the next six cities combined. Greater Cambridge's economic success to date is the story of a networked and connected city region characterised by **world-leading innovation***" (our emphasis).
- 2.3 In this section of the report we provide some background of this Government support as context for how vital it is for the Greater Cambridge Plan to ensure these national objectives are realised.

ii) Greater Cambridge Deal and the Greater Cambridge Partnership

- 2.4 The Greater Cambridge Deal was signed on 19 June 2014 by representatives of the Government, council leaders, businesses, and the University of Cambridge. The Deal secured hundreds of millions of pounds of additional funding for "*investment in transport infrastructure to support high quality economic and housing growth over the coming decades*"³ across the Greater Cambridge sub region.
- 2.5 In agreeing the deal, the Government noted how "*According to local business leaders one of the main barriers to economic success is **lack of housing** or transport measures*" (our emphasis). The deal therefore sought to accelerate delivery of 33,480 planned homes and enable the delivery of an additional 1,000 homes, whilst creating 44,000 new jobs.
- 2.6 The deal agreed that if this investment was shown to have driven economic growth, a further £200 million would be made available from April 2020 onwards and a final £200 million from April 2025.

³ <https://www.gov.uk/government/news/greater-cambridge-city-deal-signed>

2.7 In May 2020 the Government's 'Gateway Review' concluded that "*significant success and progress*" had been made, and a further £200 million was awarded to the Greater Cambridge Partnership, the local delivery body for the City Deal.

2.8 The Greater Cambridge Partnership acknowledge their role must align with other regional and local strategic documents, some of which are also of national significance such as the Oxford-Cambridge Arc.

iii) The Oxford-Cambridge Arc

2.9 The '*Planning for sustainable growth in the Oxford-Cambridge Arc*' document (February 2021) marked the initial consultation of the emerging Spatial Framework for the Arc. This is the first step to a Spatial Framework, which is scheduled to culminate in the Publication Spatial Framework document in August 2022. When adopted the Framework will become government planning policy alongside the National Planning Policy Framework (NPPF) and as the Greater Cambridge Plan First Proposals document identifies "*The Oxford-Cambridge Arc is a globally significant area*"⁴.

2.10 The Arc was conceived in 2003 by three of the former 'Regional Development Agencies' (RDAs). The objective was "*to promote and accelerate the development of the unique set of educational, research and business assets and activities that characterise the area and in doing so, create an "arc" of innovation and entrepreneurial activity that would, in time, be 'best in the field'.*"

2.11 However, it wasn't until the National Infrastructure Commission (NIC) was created by the Chancellor of the Exchequer in October 2015 that plans for the Arc began to accelerate. The commission carries out independent and unbiased assessments of the UK's long-term infrastructure needs and monitor the government's and industry's progress in meeting them. Periodically it publishes a National Infrastructure Assessment looking across all key sectors and geographies.

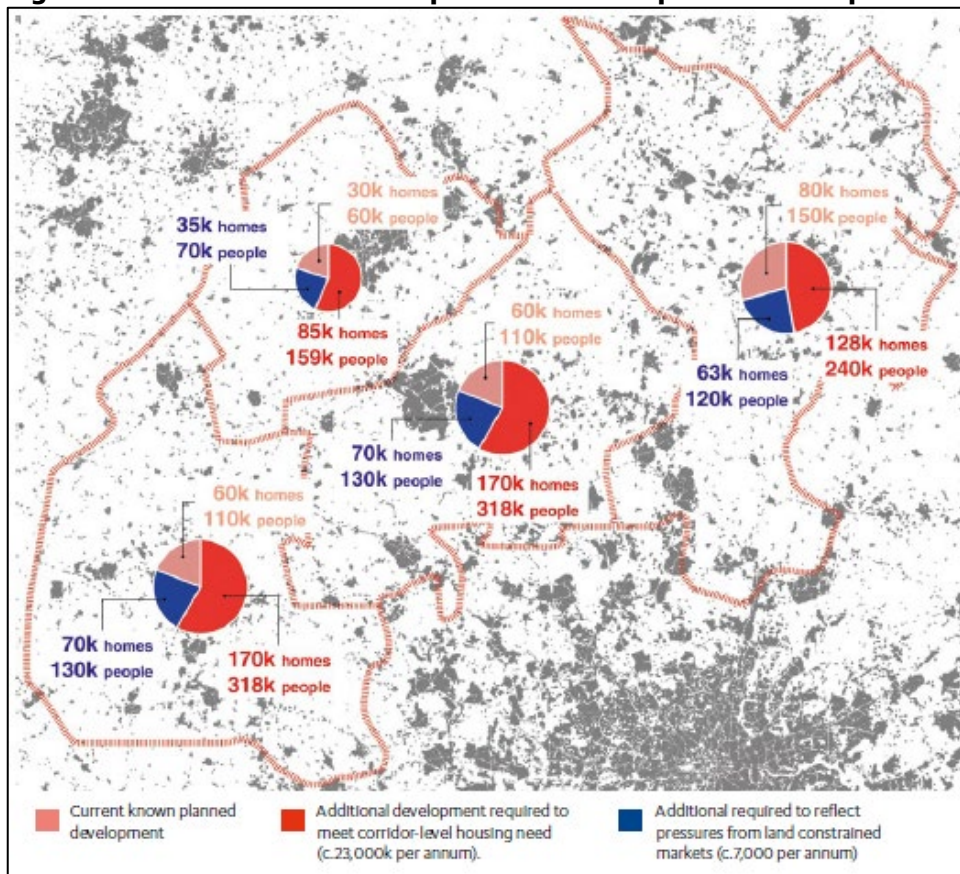
2.12 On 16 March 2016, the Chancellor asked the NIC to:

"....make recommendations [to government] to maximize the potential of the Cambridge – Milton Keynes – Oxford corridor as a single, knowledge intensive cluster that competes on the global stage, whilst protecting the area's high quality environment and securing the homes and jobs the area needs. The commission will look at the priority infrastructure improvements needed and assess the economic case for which investments would generate the most growth."

⁴ Page 14, Greater Cambridge Local Plan First Proposals, 2021

- 2.13 In November 2016, the Commission published an interim report. In summary, the document stated that a lack of sufficient and suitable housing presented a risk to future economic growth, and that without a joined-up approach to planning for housing, jobs, and infrastructure, the Cambridge-Milton Keynes-Oxford arc risked being left behind by its international competitors and thereby damaging the UK’s future competitiveness. The central finding was that house building rates needed to **double** if the arc was to achieve its economic potential.
- 2.14 In November 2017, the Commission published 'Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc'. In terms of the Cambridge-Milton Keynes-Oxford arc in its entirety, the report highlighted how to remove constraints to growth from an undersupply of housing and to realise a step change in the arc’s economy, performance will require a transformational growth in jobs.
- 2.15 Figure 2.1 below illustrates the quantum of planned and required development across the four different areas of the Arc at the time of the NIC report.

Figure 2.1: An illustration of planned and required development levels, 2016-2050



Source: Figure 6, 'The Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc report by National Infrastructure Commission (NIC).

- 2.16 The Greater Cambridge and northern Hertfordshire component of the arc (the eastern area in Figure 2.1) identified planned development of 80,000 homes, with an additional 128,000 homes needed to meet the corridor-level housing need figure, and a further 63,000 homes required to reflect pressure from land constrained markets.
- 2.17 The report acknowledges that to unlock the potential of the Arc, Government and local authorities will need to plan for major urban extensions and large new settlements - including the first new towns to be built in over a generation. Delivering development of this scale, character and quality will require local leadership, the support of local communities and skilled planning.
- 2.18 In terms of the next steps, the Partnering for Prosperity report noted that the success of the Arc depended as much on the decisions and actions of locally elected leaders as it does on Central Government. To this end, the Commission put forward what it considered to be an ambitious timetable. For example, Recommendation 9 of the report stated that:

“Government should work with local authorities and any new delivery bodies from across the arc to prepare and publish a six monthly update, with the first being published in April 2018, enabling the Commission to assess progress achieved in delivering the recommendations set out in this report.”

- 2.19 A report entitled '*Cambridge, Milton Keynes, Oxford, Northampton Growth Corridor – A Final Report for the National Infrastructure Commission*' (November 2016) by SQW, considered the economic rationale for infrastructure investment in the Cambridge, Oxford, Milton Keynes, and Northampton area.
- 2.20 The study area presents a complex geography with no precise definition, but using data on knowledge-based sector specialisation at Local Authority District (LAD) level; a definition was agreed which split the area into four sub-geographies:
1. **Greater Cambridge** and northern Hertfordshire area;
 2. Greater Oxford-Swindon area;
 3. Milton Keynes-Bedfordshire-Luton-Aylesbury Vale region; and
 4. Greater Northampton area.
- 2.21 The study referred to three separate development scenarios:
- **Business as usual** - existing levels of housing delivery are maintained (which are below those required to address the level of housing need identified in Strategic Housing Market

Assessments (SMHAs)). The ONS principal population projection is realised. Existing infrastructure commitments and plans are carried through, with basic infrastructure improvement and maintenance carried out but no further ambitious schemes realised;

- **Incremental Enhancements** - the requirements identified in SMHAs are met. An increase in population is realised in line with the ONS high migration projection. Transport infrastructure investments are made above and beyond the existing plans. Several existing constraints to economic growth are relieved; and
- **Transformational Enhancements** - housing investment is such that population grows well above the ONS high migration scenario. A high level of transport investment is realised, allowing an increase in economic integration. The study area moves towards the vision of becoming a functional economic corridor and a globally competitive knowledge cluster

2.22 The SQW report stated the following level of employment growth for the Greater Cambridge growth area (2014-2050) for each of the scenarios:

- Baseline = 0.5%;
- Incremental = 1.0%; and
- Transformational = 1.3%.

2.23 The level of employment growth associated with the 'Incremental' and 'Transformational' scenarios are set out in Table 2.2 (below) for the Greater Cambridge and North Hertfordshire area authorities.

Table 2.2: Projected employment growth (2014-2050); Incremental & Transformational scenario

Local Authority	2014	2050		2014-2050 (per annum)	
		Incremental	Transformational	Incremental	Transformational
Cambridge	104,000	153,000	171,000	49,000	67,000
South Cams	84,000	127,000	142,000	43,000	58,000
East Cams	37,000	55,000	62,000	18,000	25,000
Huntingdonshire	83,000	118,000	136,000	36,000	53,000
North Herts	58,000	78,000	88,000	20,000	30,000
East Herts	73,000	97,000	109,000	23,000	36,000
Stevenage	47,000	65,000	74,000	17,000	27,000
Greater Cams – Northern Herts	487,000	694,000	783,000	207,000 (5,750)	296,000 (8,222)

Source: Cambridge, Milton Keynes, Oxford, Northampton Growth Corridor, Final Report for The National Infrastructure Commission, SQW, 08 November 2016

2.24 In its conclusions, the SQW report notes that without the housing and infrastructure interventions outlined in the report, employment, and productivity growth in the Greater Cambridge - Hertfordshire sub area is unlikely to be maintained at current levels, and that genuinely

transformational changes will be required to realise the full potential of the study area and effect the Chancellor's envisaged "knowledge intensive growth corridor" (page 151).

- 2.25 The most recent '*Planning for sustainable growth in the Oxford-Cambridge Arc*' consultation (February 2021) is yet to update the evidence base we have summarised above. However, this is expected within the next 12 months as the Spatial Framework moves towards submission.
- 2.26 Notwithstanding the fact that new evidence will be published, it is interesting to note how Table 2.2 shows how the transformational growth considered in 2016 would have created 3,472 jobs per annum (2014-2050) in the Greater Cambridge (Cambridge City and South Cambridgeshire) area.
- 2.27 This compares to a 'recommended' range of between 2,781 and 3,748 jobs per annum in the evidence base of the Greater Cambridge Plan.
- 2.28 The importance placed on the Arc by Government was reaffirmed in '*The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners*' report published by the Ministry of Housing, Communities and Local Government (MHCLG) in March 2019.
- 2.29 In this report MHCLG stated the following:

"Following its response to the National Infrastructure Commission's report on the Arc in October 2018, the Government re-affirms in this document its long-term economic ambitions for the Arc, including an ambition for up to one million high-quality new homes by 2050, to tackle the severe housing affordability issues faced by many, and unlock the Arc's full potential"⁵ (Our emphasis).

- 2.30 In the joint declaration of ambition between the Government and the Arc, the parties signing up to the declaration also acknowledge "*the vital links beyond the Arc: for example, there are important relationships with the Midlands, with the M4 corridor and Heathrow Airport, with London and the Greater South East, and with the rest of East Anglia.*"⁶

⁵ Page 4, The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners, March 2019;

⁶ Page 7, The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners, March 2019;

2.31 The importance of the Arc for the economic growth of the country is clearly acknowledged throughout the report. It is perhaps best summarised in the Ministerial Foreword as follows:

“The arching sweep of land between Oxford, Milton Keynes and Cambridge has a unique opportunity to become an economic asset of international standing – a place that demonstrates the very best of British business and innovation, and for the benefit of local communities and the country as a whole.”

2.32 In this context, the Greater Cambridge Plan must ensure it aligns with Government’s ambitions for the wider Oxford-Cambridge Arc.

iv) Cambridgeshire and Peterborough Devolution Deal

2.33 The seven local councils in Cambridgeshire and Peterborough negotiated a ‘devolution deal’ with central Government in 2016/17. This deal provided for the establishment of a mayoral combined authority, and a directly elected mayor, for Cambridgeshire and Peterborough. It also provided certain specified powers and funding from central Government.

2.34 The Cambridgeshire and Peterborough Combined Authority was officially formed in March 2017 by then-Communities Secretary Sajid Javid MP and is made up of representatives from the seven local councils.

2.35 Key ambitions for the combined authority include

- doubling the size of the local economy;
- providing the UK’s most technically skilled workforce;
- growing international recognition for our knowledge-based economy.⁷

2.36 As part of the ambitions for the economy, the aim is to **double GVA** by 2042. Furthermore, in the original Devolution Deal with Government the vision for the combined area includes, *“Creating an area that is internationally renowned for its low-carbon, knowledge-based economy - Cambridgeshire and Peterborough will enhance its position as a global leader in knowledge and innovation, further developing its key sectors including life sciences, information and communication technologies, creative and digital industries, clean tech, high-value engineering and agri-business.”*⁸

⁷ <https://cambridgeshirepeterborough-ca.gov.uk/what-we-deliver/>

⁸ Page 3, Cambridgeshire and Peterborough Devolution Deal, 16 March 2017

v) UK Innovation Corridor

- 2.37 The importance of Greater Cambridge's location in the context of wider economic growth is further emphasised by the UK Innovation Corridor. Cambridge is located on an axis with London in this corridor, the two cities being 60 miles apart along the M11 motorway, with Stansted Airport, London City Airport, and St Pancras International station linking the corridor to the rest of the world.
- 2.38 The Innovation Corridor is the UK's leading 'Sci-Tech' region and spans 16 Local Authorities, London, three Counties and four LEP areas. The corridor is also regarded as Britain's fastest growing region, with advanced technology and biosciences creating a highly advanced sci-tech superhighway.

vi) Cambridge Norwich Tech Corridor

- 2.39 The Cambridge Norwich Tech Corridor stretches across Cambridgeshire, Suffolk, and Norfolk, and is a partnership that brings together business and political leaders with a shared ambition to make the Tech Corridor region a top-tier destination for technology businesses, talent, and investors from around the world.
- 2.40 In April 2020, International Development Secretary Liz Truss backed a new road map for the future of the Cambridge Norwich Tech Corridor, which set out the path to creating a globally significant tech cluster in the East of England. Ms Truss said:

"Technology will be at the heart of Britain's vibrant post-Brexit economy, and regional hubs like the Tech Corridor will be key to creating a diverse and compelling offer to the brightest and best from around the world."⁹

- 2.41 The aim of the corridor is to connect the world-leading research centres of Cambridge and Norwich with cutting-edge advanced manufacturing and engineering businesses.
- 2.42 The area boasts excellent transport links, centred around the upgraded A11 and regular train services to London and beyond. The airports at Norwich and Stansted, along with the Freeport at nearby Felixstowe, provide excellent international connectivity.

⁹ [Liz Truss backs plans to build world-leading Cambridge Norwich Tech Corridor cluster - UK Property Forums](#)

vii) Summary

- 2.43 This section of our report has highlighted how Greater Cambridge is located at the centre of three sub-regional economic growth areas of national and international significance.
- 2.44 Individually, the three growth areas summarised in this section are key to Britain's international economic success. Collectively they represent a significant proportion of the Government's ambition for economic success. Greater Cambridge has a role to play in achieving the success of all three initiatives, as do sites within Greater Cambridge (such as Westley Green).
- 2.45 It is therefore imperative that the Greater Cambridge Plan aligns with these strategies, a factor which is identified by the Greater Cambridge Local Plan First Proposals document. To do this, economic growth and housing growth need to be aligned with these ambitions.
- 2.46 Having identified Greater Cambridge's strategic importance in the context of national Government ambitions for economic growth, the following section of this report considers the local scale and in particular the Greater Cambridge Plan First Proposals. Specifically, we consider how the Greater Cambridge Plan aligns with the sub-regional growth identified in this section.

3.0 THE GREATER CAMBRIDGE PLAN

i) Introduction

- 3.1 The previous section of this report outlined Greater Cambridge's (and therefore Westley Green's) place in the context of national, regional, and sub-regional economic growth objectives and ambitions.
- 3.2 This section of the report focusses on the local scale and whether the Greater Cambridge Plan First Proposals (2021) reflects the economic growth ambitions set out at the national, regional, and sub-regional level.

ii) Greater Cambridge Plan First Proposals (2021)

- 3.3 The Greater Cambridge Plan covers the administrative areas of Cambridge City and South Cambridgeshire and explains how the joint Plan was committed to when the Greater Cambridge City Deal was agreed in 2014.
- 3.4 The Plan identifies how the Oxford-Cambridge Arc is "*a globally significant area including the counties between Oxford, Milton Keynes and Cambridge, identified as a key priority by the government*"¹⁰.
- 3.5 Furthermore the Plan identifies the success of the Greater Cambridge economy in recent years, describing it as having "*a strong and nationally important economy*"¹¹ and that "*Over recent years, jobs have been created faster than new homes have been built, and this has contributed to higher house prices and increased commuting into the area*"¹².
- 3.6 The Plan moves on to explain how presently, 44,400 new homes and 58,500 new jobs represents objectively assessed needs for the 2020-2041 period (2,114 dwellings per annum, and 2,786 jobs per annum). This level of development must therefore be capable of delivering the ambitions of the Oxford-Cambridge Arc if the Greater Cambridge Plan is to deliver on its promise to align with the Oxford-Cambridge Spatial Framework.

¹⁰ Page 14, Greater Cambridge Local Plan First Proposals, 2021

¹¹ Page 22, Greater Cambridge Local Plan First Proposals, 2021

¹² Page 14, Greater Cambridge Local Plan First Proposals, 2021

- 3.7 This level of housing growth exceeds the NPPF's 'standard method' which calculates **minimum** housing need, and as the Plan explains, national guidance (Planning Practice Guidance) is clear that there will be circumstances where it is appropriate to consider whether actual housing need is **higher** than that indicated by the standard method.
- 3.8 It is important to add how the Planning Practice Guidance also emphasises how the standard method is a **minimum starting point** for assessing housing need, the assessment of housing need should be **unconstrained**, and the process of establishing housing need should be carried out **before and separately** to establishing a housing requirement.
- 3.9 The Plan briefly discusses the link between homes and jobs (pages 25-26) and identifies paragraph 81 of the NPPF which requires plans to support economic growth and productivity. Expanding on this, it is important to emphasise the detail of paragraph 81 which reads as follows:

"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 innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential"¹³ (Our emphasis).

- 3.10 As we have discussed in section 2 of this report, the Cambridge-Oxford Arc is a world-leader in innovation technologies. In the 2016 '*Centre for Cities: Competing with the Continent*' report, Oxford and Cambridge were the only UK cities in the European top 20 for innovation. Cambridge ranked **first across Europe** for 'high-skilled residents'.¹⁴
- 3.11 The 'Planning for sustainable growth in the Oxford-Cambridge Arc' document (February 2021) states "*Oxford and Cambridge are world-leading centres of research and innovation*" and identifies how "*Cambridge's rate of patent applications – a key indicator of innovation – is the highest in the UK, at over 12 times the national average.*" The document also notes how the Arc was fundamental in the development of the COVID-19 vaccine.¹⁵

¹³ Paragraph 81, NPPF, 2021

¹⁴ Page 12, Centre for Cities, Competing with the Continent, September 2016

¹⁵ Paragraph 1.5, page 2, Planning for sustainable growth in the Oxford- Cambridge Arc, An introduction to the Oxford-Cambridge Arc Spatial Framework, February 2021

- 3.12 Paragraph 81 of the NPPF therefore applies to Greater Cambridge more than most locations in the country.
- 3.13 Paragraph 82 of the NPPF expands on Paragraph 81, stating how planning policies should "*seek to address potential barriers to investment, such as inadequate infrastructure, services or **housing**, or a poor environment.*"
- 3.14 It is therefore imperative that the housing requirement set by the Greater Cambridge Plan allows the employment growth associated with the ambitions for Greater Cambridge and the wider Oxford-Cambridge Arc to be realised, and not restrict this economic growth.
- 3.15 It is notable how the Greater Cambridge Plan First Proposals document states how growth of 58,500 jobs and 44,400 homes "*was the **medium growth** level from our strategic options that we published in November 2020 (called the central level in our Employment Land and Economic Development Evidence Study)*"¹⁶ (our emphasis).
- 3.16 In this context it is important to review the evidence base which underpins the objectively assessed needs for the Greater Cambridge area. This will identify whether there are alternatives to the objectively assessed needs of the area and whether these alternatives align more closely with the economic growth ambitions for Greater Cambridge in the context of its location within the economic growth corridors summarised in section 2 of this report.

iii) Summary

- 3.17 This section of the report has considered the content of the 'Greater Cambridge Plan First Proposals' document in the context of the national, regional, and sub-regional aspirations for the area set out in section 2.
- 3.18 It is clear from the review that the Greater Cambridge Plan acknowledges its role in delivery of the growth associated with the Oxford-Cambridge Arc, and Greater Cambridge's place as one of the world-leading centres for innovation.

¹⁶ Page 25, Greater Cambridge Local Plan First Proposals, 2021

3.19 In the context of Central Government's clear economic growth aspirations for the Oxford-Cambridge Arc, the next section of the report reviews the evidence base documents underpinning the conclusion for objectively assessed needs being 44,400 homes and 58,500 jobs.

4.0 EVIDENCE BASE REVIEW

i) Introduction

4.1 The Greater Cambridge Plan is underpinned by an extensive evidence base. In this section of the report, we consider the evidence base documents which are most relevant to the economic growth of Greater Cambridge and the wider Oxford-Cambridge Arc, the UK Innovation Corridor, and the Cambridge Norwich Tech Corridor.

4.2 Specifically we consider whether the employment and housing growth proposed in the Greater Cambridge Plan First Proposals is of a quantum to achieve the aspirations for Greater Cambridge and the wider sub-region.

ii) Cambridgeshire and Peterborough Independent Economic Review (CPIER, September 2018)

4.3 The CPIER (September 2018) was produced by the Cambridgeshire and Peterborough Independent Economic Commission. This Commission was established by the Cambridgeshire and Peterborough Combined Authority (CPCA) in June 2017 and is chaired by the leading British economist Dame Kate Barker.

4.4 Included in the objectives of the CPIER were to:

- Develop an authoritative evidence base on the economic performance and potential of Cambridgeshire and Peterborough;
- Provide impartial advice and guidance, on an ongoing basis, on the performance and growth of the Cambridgeshire and Peterborough economy;
- Foster a common understanding of the future development of Cambridgeshire and Peterborough's economy and the long-term drivers for change across local partners, Whitehall, and Ministers; and
- provide a robust and independent assessment of the Cambridgeshire and Peterborough economy and its potential for growth.

4.5 The CPIER incorporated a full baseline economic study which incorporated economic forecasting to determine the potential impact of various scenarios over the next ten years and how the

Cambridgeshire and Peterborough economy could respond to these, and an assessment of whether the Cambridgeshire and Peterborough economy is fit for purpose and its future economic potential.

- 4.6 The report incorporated several recommendations following its research, and concluded that it was readily able to substantiate the conclusion that *"The success of Cambridgeshire and Peterborough is a project of **national** importance"*¹⁷ (Our emphasis)
- 4.7 The preface of the report also stated *"We consider that the aim of **doubling GVA** in this area by 2040 is **realistic**, and will be achieved in part by attracting knowledge-intensive businesses which would not locate elsewhere in the UK. Success here is of **national** significance. But it will only be attained if there is **more ambition** with regard to the development of **new housing**, and a careful prioritisation of infrastructure projects"* (Our emphasis)¹⁸
- 4.8 Of the recommendations referred to above, key recommendation 3 highlighted the national importance of the 'knowledge-intensive' business in the area. This recommendation stated:

"The UK Government should adopt a 'Cambridge or overseas' mentality towards knowledge-intensive (KI) business in this area, recognising that in an era of international connectivity and footloose labour, many high-value companies will need to relocate abroad if this area no longer meets their needs. Ensuring that Cambridge continues to deliver for KI businesses should be considered a nationally strategic priority"¹⁹ (Our emphasis).

- 4.9 Housing delivery in the area will need to be of a quantum which supports this growth, and key recommendation 5 states the following:

"There should be a review of housing requirements based on the potential for higher growth in employment than currently forecast by the EEFM. This review should take into account the continuing dialogue between ONS and the Centre for Business Research on employment numbers as well as the impact of the Cambridge-Milton Keynes-Oxford Arc. This should be used to set new targets which are likely to be higher than those already set – at the very least adding on accumulated backlog"²⁰ (Our emphasis).

¹⁷ Executive Summary, page 8, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

¹⁸ Preface, page 5, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

¹⁹ Key Recommendation #3, page 126, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

²⁰ Key Recommendation #5, page 126, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

- 4.10 The CPIER made it very clear through these recommendations, that Cambridge is at the heart of an internationally significant area for knowledge-intensive business, and that this should make it one of the Government's highest priority areas for growth.
- 4.11 Furthermore, the CPIER concluded that to fulfil these growth ambitions housing growth should align with employment growth which exceeded the baseline economic forecasts of the East of England Forecasting Model (EEFM). As the CPIER note, *"EEFM's projections for employment growth in recent years fell below the actual outturn by a **significant** margin"*²¹
- 4.12 The result of local authorities using the EEFM baseline forecasts to inform housing need has been an underestimate of housing need according to the CPIER report. The report noted (as of 2018) that objectively assessed need across the area was 4,670 dwellings per annum (dpa). Based on this estimate, and assuming it was correct, delivery had fallen short of need by 10,000 dwellings over a decade.
- 4.13 The CPIER report concluded that need would be 5,655 dpa to recover this deficit over the next 10 years. However, the CPIER also concluded that *"the rates of housebuilding required to maintain growth at our central projection without further inflationary pressure could be as high as **9,000 houses per year**"*²² (Our emphasis).
- 4.14 More houses were needed because of several reasons, not least the significant affordability constraints. Furthermore, a qualitative survey of business was carried out by PwC and Cambridge Ahead. This survey showed how 44.6% of the business surveyed stated that *"the quality and availability of the local labour force was either very important or critically important."*²³
- 4.15 In respect of the 'knowledge-intensive' sectors, Cambridge is considered to be the only viable 'cluster' in the UK. It is therefore imperative to maintain and enhance the environment for the knowledge-intensive sectors and ensure there is adequate labour supply and housing for this labour supply.
- 4.16 In this context the CPIER report notes how *"If a KI company is forced to move away from the sphere of clustering activity, it is likely to relocate to another cluster, rather than stay in the local area. For some of these knowledge-intensive sectors, **Cambridge** is the only viable cluster in the*

²¹ page 68, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

²² page 68, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

²³ page 47, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

*UK. In such a scenario they would be likely to move abroad. 35.4% of respondents to the qualitative survey said it was possible, likely, or certain that they would **move activity abroad** to elsewhere in Europe, and of those respondents who said they would likely or certainly move activity outside of the area, significantly more indicated that they would **move abroad (44.2%)** than elsewhere in the UK (25.0%)²⁴ (Our emphasis).*

- 4.17 One of the respondents commented, *"Our reliance on a highly skilled work force, which could not easily be found elsewhere, would make relocation from the C&P area very difficult."*
- 4.18 The CPIER report also concluded that more housing was required to ensure 'economic and social dynamism' in the area was not affected. This would be likely to suffer if enough housing wasn't delivered *"due to a population which will inevitably age where there is a combination of high property prices and insufficient additions to the housing stock."*²⁵

iii) Greater Cambridge Local Plan: Housing and Employment Relationships (Nov 20)

- 4.19 The second document referred to in the First Proposals Plan is the 'Housing and Employment Relationships' report. This considered how much employment would be supported by the NPPF's Standard Method for calculating minimum housing need. Furthermore, the report considered the level of housing required to support economic growth scenarios of the 'Greater Cambridge Employment Land and Economic Development Evidence Base' (ELR).
- 4.20 Section 3 of the report considers the job growth that would be supported by the Standard Method for Greater Cambridge (1,743 dpa). This is made up of 1,085 dpa for South Cambridgeshire, and 658 dpa for Cambridge. Overall, the Standard Method minimum would deliver 36,600 dwellings over the 2020-2041 period.
- 4.21 However, as Table 15 of the document summarises, only 45,800 jobs would be supported by the Standard Method. This is significantly lower than the 58,500 jobs referred to in the Greater Cambridge Plan First Proposals.
- 4.22 The document then moves on to consider economic forecasts developed for and published in the 'Greater Cambridge Employment Land and Economic Needs Study' (November 2020). Two scenarios are considered, as follows:

²⁴ page 54, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

²⁵ page 70, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

- Higher Growth: assumes the baseline forecast for most sectors but identifies higher growth sectors particular to Greater Cambridge, being Research & Development (R&D), Professional services, and Health & care (related to R&D). For these sectors, the forecast is increased to halfway between the baseline and the historic growth rate from 2001-17 to reflect their higher potential. It also considers multiplier effects of growth. Overall, this is a plausible but more aspirational growth outcome.²⁶
- Central: follows a similar pattern to the higher growth scenario but uses the lower quartile rather than mid-point between historic growth and future baseline rates. This provides alignment with past absolute annual growth rates and as a result reflects a 'business as usual' growth scenario.

- 4.23 The 'Central' scenario results in growth of 58,441 jobs 2020-2041 (2,782 jobs per annum). The 'Higher' growth results in growth of 78,742 jobs 2020-2041 (3,750 jobs per annum).²⁷
- 4.24 The 'Central' scenario (KS2) is therefore based on an average annual growth rate of 1.1%, and the 'Higher' scenario (KS3) on 1.5% per annum.
- 4.25 As we have identified above, the Greater Cambridge Plan First Proposals document is based on objectively assessed needs of 44,400 homes and 58,500 jobs, 2020-2041. The Plan is therefore underpinned by the growth associated with the 'Central' scenario, as the Housing and Employment Relationships report shows need of 44,331 dwellings, 2020-2041 to support 58,441 jobs (1.1% annual growth).²⁸
- 4.26 However, this does not take account of the 'Higher' scenario which the Housing and Employment Relationships report shows would require 56,490 dwellings 2020-2041.²⁹ This represents an increase of 27% from the housing need based on the 'Central' scenario, and currently being taken forward in the First Proposals Plan.
- 4.27 The report describes the 'Higher' scenario as "plausible but more aspirational" and in this context and in the context of the location of Cambridge at the crossroads between two innovation corridors and the Oxford-Cambridge Arc, such a scenario for growth should be considered for the Greater Cambridge Plan.

²⁶ Paragraph 4.9, page 36, Greater Cambridge Local Plan: Housing and Employment Relationships, November 2020

²⁷ Table 17, page 37, Greater Cambridge Local Plan: Housing and Employment Relationships, November 2020

²⁸ Table 23, page 40, Greater Cambridge Local Plan: Housing and Employment Relationships, November 2020

²⁹ Ibid

iv) Greater Cambridge Employment Land and Economic Development Evidence Study (Nov 2020)

4.28 The 'Housing and Employment Relationships' report summarised above shows the housing need generated to fulfil the 'Central' and 'Higher' employment growth scenarios. However, the 'Housing and Employment Relationships' report does not determine the housing need required to be delivered for all of the employment scenarios considered in the Employment Study. The scenarios for employment growth set out in the Employment Study are summarised in Table 4.1.

Table 4.1: Employment forecast by method, Greater Cambridge 2020-41

Scenario	2020-2041 job change	Growth rate per annum	Housing need generated
EEFM/CE forecast baseline (E1)	40,100	0.8%	n/a
Standard Method (SM)	45,761	0.9%	36,603
2001-2017 annual average change	55,300	n/a	n/a
Central Growth (KS2)	58,400	1.1%	44,331
Higher Growth (KS3)	78,700	1.5%	56,490
CPIER proxy (CP)	92,100	1.7%	n/a
2011-2017 annual average change	125,200	2.1%	n/a

Source: Table 10, page 94, Greater Cambridge Employment Land and Economic Needs Study
n/a = not available from the evidence base.

- 4.29 As we have already identified, the Greater Cambridge First Proposals document plans to take forward the 'Central' growth scenario, based on employment growth of 58,500 jobs 2020-2041, at an average annual growth rate of 1.1%.
- 4.30 This growth rate needs to be considered in the context of evidence on existing growth rates in Greater Cambridge and beyond.
- 4.31 The CPIER report summarised earlier in this section identifies how Cambridge and South Cambridgeshire Districts experienced average annual employment growth of **2.4%** and **2.3%** respectively according to Office for National Statistics data, between 2010 and 2016.³⁰
- 4.32 However, the CPIER report states "*by studying the global employment of all companies based in our area, we come to the conclusion that this is higher still*"³¹. The CPIER report goes on to explain

³⁰ Table 1, Page 44, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

³¹ Page 44, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

how they have created "a 'blended rate' of employment growth, which combines employment growth rate data for the corporate sectors where we have the most knowledge, and the ONS growth rates where we are less confident (for instance, in relation to retailing and the public sector employment)." ³²

- 4.33 This approach by CPIER results in an annual employment growth rate for Cambridge which is the same as the ONS rate (2.4%), but a significantly higher rate (4.2%) is calculated for South Cambridgeshire.
- 4.34 Both authorities of Greater Cambridge experienced a growth rate **over 1% higher** between 2010 and 2016 than the employment growth which is relied on for the Greater Cambridge First Proposals document (1.1% per annum, 58,500 jobs 2020-2041).
- 4.35 Even if the Greater Cambridge Plan First Proposals was to be underpinned by the 'Higher Growth' scenario, the job growth associated with the scenario (1.5%), would still be nearly **1% below** the minimum for South Cambridgeshire since 2010 (2.4% - 4.2%) and nearly 1% lower than that for Cambridge (2.4%).
- 4.36 Barton Willmore have compared this growth with the employment growth data published by Oxford Economics (October 2021) for Cambridge City and South Cambridge. Taking the two authorities together (Greater Cambridge), the growth from 1991 to 2020 has averaged 2.2% per annum. Between 2010 and 2020 the growth rate was 2.6%. These forecasts consider the effect of COVID-19.
- 4.37 In this context it is considered that the 'Higher Growth', 'CPIER proxy', and '2011-2017 average annual change' scenarios for employment growth set out in Table 4.1 (above) are achievable, particularly in the context of Greater Cambridge's role in the economic growth of the Oxford-Cambridge Arc and the Innovation Corridors.
- 4.38 Furthermore, as the CPIER report (summarised above) highlights, the Cambridge and Peterborough Devolution Deal aims to double GVA by 2042. The CPIER report concludes this would require annual employment growth equating to 2.8% per annum.³³

³² Pages 44-45, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

³³ Page 33, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

4.39 As Table 4.1 (above) indicates, the highest growth rate considered in the Council's evidence base is 2.1%, generating 125,200 jobs 2020-2041. This is **over double** the number of jobs underpinning the Greater Cambridge Plan First Proposals (58,500 jobs 2020-2040) and remains 0.7% lower than the annual growth needed to double GVA.

v) Summary

4.40 This section of the report has considered the evidence underpinning the Greater Cambridge Plan First Proposals document, alongside the CPIER report for Cambridge and Peterborough. This evidence has been evaluated in the context of our analysis in sections 2 and 3 of this report. The key points to note are as follows:

- The Greater Cambridge Plan First Proposals is based on employment growth equating to 58,500 jobs 2020-2041 (2,786 jobs per annum), or average annual employment growth of 1.1%;
- Growth of 1.1% per annum should be considered in the context of historic growth of 2.2% per annum over the long term (1991-2020) and 2.6% between 2010 and 2020 across Greater Cambridge;
- CPIER research suggests that growth has been as high as 4.2% per annum in South Cambridgeshire (2010-2016);
- Notwithstanding this the Greater Cambridge Plan First Proposals evidence base only considers the relationship between employment growth and housing need based on employment growth of 1.1% and 1.5% per annum;
- This equates to a housing need of 44,400 homes (1.1% employment growth per annum) and 56,490 homes (1.5% employment growth per annum);
- In the context of Greater Cambridge's strategic importance for the economy of the country, and its place as a global leader in knowledge and innovation, employment growth assumed in the Greater Cambridge Plan First Proposals is very low;
- It could also be argued that the 'Higher' and 'CPIER' scenarios (78,700 and 92,100 jobs 2020-2041 respectively) remain low in the context of historic growth and the ambitions of the Cambridge and Peterborough Devolution Deal;
- Furthermore, it is questionable whether economic growth of 1.1% would support the aspirations of the Oxford-Cambridge Arc.

5.0 SUMMARY AND CONCLUSIONS

5.1 Greater Cambridge is located at the heart of a sub-region which is of national and international economic significance. The Technical Report we have presented here distils Greater Cambridge's (and therefore Westley Green's) strategic significance by reviewing the plans for Greater Cambridge set out in the Greater Cambridge Plan First Proposals document, and how these plans align with other plans and strategies for the area. The report evaluates whether the development proposed in the Greater Cambridge Plan First Proposals document aligns with the growth expected in these other plans and strategies.

5.2 The key points to note from the report can be summarised as follows:

National and sub-regional strategies

- Cambridge is at the centre of three nationally recognised economic corridors, including the Oxford-Cambridge Arc. The Oxford-Cambridge Arc is supported by Central Government who have identified it as a 'key economic priority'³⁴ for the country. Separately the Cambridge and Peterborough Devolution Deal aims to double GVA in the area over 25 years;³⁵
- The Greater Cambridge City Deal (2014) aims to *support high quality economic and housing growth over the coming decades*³⁶ and to address the view of local business leaders that *"one of the main barriers to economic success is lack of housing"*;
- Further investment was made by Government in May 2020 following the Government's 'Gateway Review' which concluded that *"significant success and progress"* had been made in delivering the objectives of the City Deal;
- Greater Cambridge is located within the Oxford-Cambridge Arc, a *"a globally significant area"*³⁷.
- The National Infrastructure Commission (NIC) published '*Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc*' in 2017. This concluded that 'transformational' growth in jobs would be required to remove constraints to growth from an undersupply of housing in the past;
- Transformational growth in Greater Cambridge (based on 1.3% per annum employment growth) equated to 3,472 jobs per annum (2014-2050) according to the NIC report;

³⁴ Page 7, The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners, 2019

³⁵ Page 3, Cambridge and Peterborough Devolution Deal, 2017

³⁶ <https://www.gov.uk/government/news/greater-cambridge-city-deal-signed>

³⁷ Page 14, Greater Cambridge Local Plan First Proposals, 2021

- This compares with 2,781 jobs per annum being taken forward by the Greater Cambridge Plan First Proposals document;
- The Cambridge and Peterborough Devolution Deal (2017) seeks to double GVA in the area over 25 years;
- The vision of the Devolution Deal is to create *"an area that is internationally renowned for its low-carbon, knowledge-based economy."*
- Greater Cambridge is also located within the 'UK Innovation' and 'Cambridge Norwich Tech' corridors which seeks to develop advanced technology and biosciences, and advanced engineering/manufacturing;

Greater Cambridge Plan First Proposals

- The Plan identifies Greater Cambridge as having *"a strong and **nationally important** economy"*³⁸ and that *"Over recent years, jobs have been created faster than new homes have been built, and this has contributed to higher house prices and increased commuting into the area"*³⁹.
- The Plan acknowledges the Oxford-Cambridge Arc and seeks to align with the Arc's emerging Spatial Framework;
- To do so the Plan sets out its objectively assessed needs as 44,400 homes supporting 58,500 jobs, 2020-2041;
- In this context it is imperative that this level of growth complies with paragraphs 81 and 82 of the National Planning Policy Framework (NPPF);
- Paragraph 81 states that planning policies should place *"significant weight"* on the need to *"support economic growth and productivity"*;
- Paragraph 81 of the NPPF continues this is *"particularly important where Britain can be a global leader in driving **innovation**, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."*
- The 'Planning for sustainable growth in the Oxford-Cambridge Arc' document (February 2021) identifies how *"Cambridge's rate of patent applications – a key indicator of innovation – is the **highest in the UK**, at over 12 times the national average."*⁴⁰
- It is imperative in this context that employment growth and associated housing growth in the Development Plan is of a quantum to support these national policies.

³⁸ Page 22, Greater Cambridge Local Plan First Proposals, 2021

³⁹ Page 14, Greater Cambridge Local Plan First Proposals, 2021

⁴⁰ Paragraph 1.5, page 2, Planning for sustainable growth in the Oxford- Cambridge Arc, An introduction to the Oxford-Cambridge Arc Spatial Framework, February 2021

Evidence base review

- The Cambridgeshire and Peterborough Independent Economic Review (CPIER, September 2018) concluded *"the aim of **doubling GVA** in this area by 2040 is **realistic**, and will be achieved in part by attracting **knowledge-intensive** businesses which would not locate elsewhere in the UK. Success here is of **national** significance. But it will only be attained if there is **more ambition** with regard to the development of **new housing**, and a careful prioritisation of infrastructure projects"* (Our emphasis) ⁴¹
- To double GVA over 25 years, the CPIER report concludes that annual employment growth equating to 2.8% per annum would be required⁴²;
- The Greater Cambridge Plan First Proposals is based on employment growth equating to 58,500 jobs 2020-2041 (2,786 jobs per annum), or average annual employment growth of 1.1%;
- Growth of 1.1% per annum should be considered in the context of historic growth of 2.2% per annum over the long term (1991-2020) and 2.6% between 2010 and 2020 across Greater Cambridge;
- CPIER research suggests that growth has been as high as 4.2% per annum in South Cambridgeshire (2010-2016);
- Notwithstanding this the Greater Cambridge Plan First Proposals evidence base only considers the relationship between employment growth and housing need based on employment growth of 1.1% and 1.5% per annum;
- This equates to a housing need of 44,400 homes (1.1% employment growth per annum) and 56,490 homes (1.5% employment growth per annum);
- In the context of Greater Cambridge's strategic importance for the economy of the country, and its place as a global leader in knowledge and innovation, employment growth assumed in the Greater Cambridge Plan First Proposals is very low;
- It could also be argued that the 'Higher' and 'CPIER' scenarios (78,700 and 92,100 jobs 2020-2041 or 1.5% and 1.7% annual growth respectively) remain low in the context of historic growth and the ambitions of the Cambridge and Peterborough Devolution Deal;
- Furthermore, growth of only 1.1% would be unlikely to support the aspirations of the Oxford-Cambridge Arc.

⁴¹ Preface, page 5, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

⁴² Page 33, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

- 5.3 In conclusion, the evidence set out in this report suggests that the Greater Cambridge Plan First Proposals includes an employment growth assumption (1.1% per annum) which is very low based on 1) historical economic performance in the area (over 2% per annum over the past 29 years), and 2) the nationally significant plans for economic growth, including the ambition to double GVA over 25 years (requiring 2.8% per annum growth).
- 5.4 The evidence base does not assess how much housing would be required beyond what would be required based on 1.5% per annum employment growth (Higher Growth scenario). This higher growth scenario would require an increase in objectively assessed need included in the Plan, from 44,400 homes to 56,490 homes, 2020-2041.
- 5.5 However as explained above, employment growth which more closely aligns with past performance and that aspired to in order to double GVA over the next 25 years would require a substantial increase in the Councils' employment growth and housing delivery assumptions.

APPENDIX 2

Barton Willmore

**Sustainability Appraisal Compliance
Review**

Appendix 2 - Greater Cambridge Local Plan First Proposals (Reg 18) Sustainability Appraisal Review

- 1.1 This report sets out the conclusions of a review of the Sustainability Appraisal (SA) process supporting the Greater Cambridge Local Plan (GCLP) which is at the First Proposals Stage (Regulation 18 Stage)¹. Cambridge City Council and the South Cambridgeshire District Council are working together to create a joint Local Plan for the two areas, referred to as Greater Cambridge. Both Councils adopted their current Local Plans in 2018, which included a commitment to an early review, in particular to update the assessment of housing needs and to review the progress of delivering planned developments including new settlements. The First Proposals stage sets out the preferred approach to the level of growth that should be planned for, and where it should be planned. The review has focused on the SA (which incorporates Strategic Environmental Assessment (SEA)) of the GCLP: Sustainability Appraisal (hereafter referred to as the Reg 18 SA Report), prepared by LUC in October 2021. The Reg 18 SA Report is undergoing consultation to offer an opportunity to submit representations to the Draft Plan.
- 1.2 Whilst the review has focused on the latest SA material, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative SA process. This has also included the supporting SA material, including Appendices and Annexes.
- 1.3 The Plan will undergo amendments before further consultation with an updated SA Report at Regulation 19 stage, which is planned for Autumn 2022. The final SA report will be submitted with the submission version of the Plan to the Secretary of State for Examination In Public (programmed for 2023/2024).
- 1.4 This report provides a focused review of the compliance of the GCLP Reg 18 SA Report. The SA process has been undertaken in a comprehensive manner and no areas of legal deficiency have

¹ Greater Cambridge Local Plan. August 2021. <https://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-preferred-options/about-plan>

been identified. However, there are areas that would benefit from additional consideration and clarity as the Plan progresses. Areas for improvement include:

- Confirmation of why updates to policy and Government strategy do not require alterations to the Sustainability Framework, particularly in light of the increased focus on climate change in the NPPF 2021 and the Net Zero Strategy 2021;
- Baseline data should reflect the latest available datasets. This is particularly important for health and wellbeing and the economy given the COVID-19 pandemic;
- Further clarification on how mitigation measures including assumptions around transport infrastructure have been factored in to scoring the reasonable alternatives. This limitation is noted in the appraisal but it is not clear how the scoring is equitable between sites/growth options as a result;
- For climate change mitigation, consideration of whole life carbon in developments, ecosystem services and reduction in travel, all should be considered alongside the “hard” measures focused on energy efficiency in buildings and low carbon energy sources (for which a level playing field will be created by the Future Homes Standard and update to the Building Regulations).

SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW		
	Compliance Key	Notes
<p><i>This is a compliance review against the requirements of the Regulations. It has not been undertaken by a legal professional. The SA process has been reviewed against the SEA Regulations and requirements of the Planning and Compulsory Purchase Act 2004 on SA. The following reports have been considered:</i></p> <p><i>SA Scoping Report (2019)</i> <i>SA Issues and Options Report (2020)</i> <i>Regulation 18 SA Report</i></p>		Meets requirements
		Potential risk of challenge. Improvements suggested
		High risk of challenge. Does not meet requirements
SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report		
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.		<p>Covered in SA Scoping Report, SA Issues and Options Report and Section Chapter, 1, 3 and Appendix B of the Reg 18 SA Report.</p> <p>Section 3 of the Reg 18 SA Report outlines the aim, purpose and objectives of the GCLP and the SA process. This includes a summary of the Cambridge Local Plan (2018) and the South Cambridgeshire Local Plan (2018). Section 3 explains the effect of both Brexit and Covid-19 (Paragraph 3.10) and also discusses the implications of the Planning for the Future White Paper (August 2020). The Reg 18 SA Report covers the updated NPPF (July 2021) and the relevant Neighbourhood Plans also.</p> <p>However, whilst a summary of the context of recent policy changes is given, there is little material discussion on how this has impacted the decision not to amend the decision-making framework and scoring framework for the SA. In particular, the growing importance of Climate Change and its inter-relations with other aspects such as Health and Wellbeing are largely ignored. The updated NPPF (2021) provides a focus on climate resilience (especially flood risk and extreme weather events), as well as governmental publications such as the Net Zero Strategy (2021) which have the potential to influence many facets of the SA Framework. Further explanation of how the SA Framework remains current given this policy landscape is needed.</p>
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.		<p>Covered in SA Scoping Report and Chapter 3 and Appendix B of the Reg 18 SA Report.</p> <p>Chapter 3 refers to the supporting Appendix B of the Reg 18 SA Report for detail of the baseline data, whilst key sustainability issues and the likely future evolution of the baseline without the plan is contained within Chapter 3. It would be helpful for a summary of the key baseline datasets to be included within Chapter 3, particularly as the discussion of the likely future evolution without implementation of the plan is in itself contingent on the current baseline itself.</p> <p>With regards to individual data sets, it is acknowledged that certain standardised surveys such as the Census are only available within particular timeframes. However, it is also appropriate to supplement the 2011 Census Data with additional, governmental surveys provided by the Office for National Statistics. This is particularly true with regards to Health, where census data from over ten years ago is not necessarily an accurate position. This view is taken in consideration that the understanding of health, how it is measured and how the built form can influence health has broadened significantly over the past decade. The supporting maps (Figure B.1-3 of Appendix B) are helpful visual tools but these are but a snap-shot of the health baseline in any one certain year (taken as 2019). Therefore, particularly in consideration of the effect of the Covid-19 Pandemic, these health baseline datasets and in particular the Index of Multiple Deprivation (IMD) should reflect the most current public data. This is in keeping with the discussion at Paragraph 3.10 of the Reg 18 SA Report which acknowledges the wide-ranging impact that Covid-19 has had on the GCLP area.</p> <p>It would be helpful if the Reg 18 SA Report clarified that the baseline data published in the SA Scoping Report (2019) has been updated within the text of the Reg 18 SA Report, focusing on overall trends and if these have changed. In turn, any changes in trends would impact the SA Objectives and Framework outlined and reinforce the iterative nature of the SA Process.</p> <p>Appendix B touches upon the climate change mitigation but provides only a light-touch approach to how emissions in the GCLP area would change without implementation of the Plan. Appendix B does also not provide detail of the impact of climate change resilience, save some discussion of the impact of flood risk. It is clear that climate change resilience is multifaceted and much more than the impact of extreme weather events and the SA Report should cross-reference other impacts also (drawing on published reports such as the Committee for Climate Change's Independent Assessment of UK Climate Risk and Progress Report).</p>
3. The environmental characteristics of areas likely to be significantly affected.		<p>Covered in SA Scoping Report and Reg 18 SA Report.</p> <p>As above, it would be helpful if the Reg 18 SA Report more clearly stated that every effort has been made to ensure that the SA reflects the latest evidence base upon which effects have been identified and that the SA of future iterations of the GCLP and associated new reasonable alternatives will continue to benefit from the more recent, accurate and consistent evidence available. It would be helpful if the SA outlined the aspects of the assessment process which might benefit from additional research or evidence to provide further detail. For example, the inclusion of an indicative list of updated evidence that would be expected to improve the SA assessments, including: School capacity; GP surgery capacity; Carbon footprint; and Ecosystem services.</p>
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.		<p>Covered in Chapter 2, Chapter 4 (for strategic spatial and site options) and Chapter 5 (for the policy approaches) of the Reg 18 SA Report.</p> <p>Chapter 4 provides the spatial distribution options assessed throughout the Reg 18 SA Report. This begins with outlining six options that were assessed in the SA of the First Conversation Issues and Options (December 2019) and the relative scoring against the SA Objectives. Four further spatial options were also added throughout the process to the Reg 18 SA Report. It is recognised that many of the spatial options cannot meet the full housing need and therefore each option requires additional sources of supply (Paragraph 4.18). It is acknowledged that in turn, this has led to substantial overlap between some of the options, leading to similar effects for the</p>

provision of new settlements in particular. It is not sufficiently clear within the Reg 18 SA Report how each spatial option compares with the other options as the majority of the justification of the appraisal score sits within Appendix C. It is recommended that a potted summary is provided which would provide reasonings for the scoring of each option, in recognition in particular that the effects against objectives may be uncertain and explanation is needed.

The treatment of all spatial options is not equal as acknowledged at Paragraph 4.21 whereby Spatial Options 3 (Edge of Cambridge – Green Belt) and 5 (Dispersal – Villages) are assumed to be fully built out within the plan period, hence are limited temporally to short-medium effects. Table 4.3 – 4.15 outlines the effects of each spatial option against each SA Objective.

It is not sufficiently clear what, if any, additional mitigation has been applied to the SA scoring framework when assessing the spatial policy options. For example, At Paragraph 4.32, it is stated with regard to the preferred option (9) for growth at Cambourne: *"in addition a new railway station and public transport improvements are expected to be delivered at Cambourne, which will provide good access to Cambridge and probably to other large settlements outside of Greater Cambridge, therefore giving access to a wider range of services and facilities."* This is caveated by: *"There is some uncertainty regarding when these will come forward". However, it is clear that this same level of additional mitigation for highways and/or wider infrastructure has not been explicitly applied across all of the options. Indeed, it is considered that any medium-large development would be required to provide public transport improvements in particular, which are not considered"*. At Paragraph C.41 (Appendix C), for example, there is little to no mention of the way in which infrastructure would be brought forward for new settlements when compared to Option 9. This is despite, as recognised, there would remain uncertainty for all options regarding what and how this would be provided and forms part of the assumptions outlined in Appendix D (D.35).

Furthermore, the treatment of options with regards to Objective 12: Climate Change Mitigation is also not transparent. Whilst Option 1 (Densification) is adjudged to perform the best, Option 6 (Public Transport Corridors) and 9 (Preferred options) also performs relatively well. This is largely due to 'minimising the need to travel' (Paragraph 4.114) with access to existing services, facilities and employment. It is not clear that enough emphasis has been placed within the SA appraisal and within the framework itself on the ability of urban extensions and strategic new settlements to promote self-containment and reduce the need for travel from the outset. Instead, the focus of the appraisal of options is on the modality of travel and other aspects of design which are governed by regulatory systems, such as 'energy efficient design' and 'low carbon' technologies. Appraisal of the vision of the Local Plan First proposal states that the aim seeks to achieve net zero 2050 by siting development in locations that will limit carbon emissions and high energy efficiency standards in new development. The updates to Building Regulations Part L and the Future Homes Standard will provide a level playing field for operational emissions. Consideration of whole life carbon in developments, ecosystem services and reduction in travel at all should be considered alongside the "hard" measures focused on.

It is stated that more than 700 sites were tested by the Councils through the Greater Cambridge HELAA in a wide range of locations across Greater Cambridge. It is stated that the HELAA identified as to where a site was *"suitable, available and achievable for development"*, with supporting information provided at Appendix E. The reasons for site selection is stated at Appendix E (E.28) as: *"a summary of why sites subject to appraisal were included in the First Proposals as preferred options, and why other sites were not included, has been provided as a separate document."* This leads the reader to have to need to check across multiple documents to achieve an understanding of the reasons for site selection which provides for an incoherent process for comparing individual sites.

Whilst the HELAA provides some categorisation of topics assessed (such as Landscape and Townscape; Biodiversity etc.) it does not cover the totality of the SA Objectives outlined within the 2018 SA Report. It is therefore not clear how the data for certain objectives, such as Objective 11 and 12 have been robustly sourced and applied to each site.

This issue also arises with regard to the assessment of individual sites, there appears to be no standardised methodology for data gathering. Paragraph 2.31-2.32 provides a brief summary of the site options and states that assumptions are applied using *"data directly from the HELAA and mapped data, using Geographic Information Systems (GIS)"*.