

Greater Cambridge Local Plan - First Proposals – November 2021

The following is a response by Mike Lynch of [redacted] to the First Proposals for the Greater Cambridge Local Plan as part of consultation process 1st November – 13th December 2021.

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Summary of submission

1. The First Proposals for the Greater Cambridge Local Plan published in November 2021. Lead Councillors of both Local Authorities have welcomed their ambitious approach to meeting environmental challenges and also felt that the proposals would protect the rural areas of South Cambridgeshire from inappropriate development, although there was some note of caution as to the availability of adequate water supplies for the proposals' full realisation.
2. While the First Proposals go some way to describing the current planning pressures, challenges and opportunities facing the Greater Cambridge area, lack the essential balance required in order to achieve an optimal outcome over the period 2021 -2041. They leave the way open for the even the minimum goals on climate change to be compromised and for significant avoidable harm to be done to the natural and built environment.
3. It is open to question whether the proposal to use a method other than the Government's Standard Method for calculating future housing need can be justified and refers to an alternative official calculation for comparison and discussion.
4. There is urgent need for the most rigorous measures to reduce Co2 emissions to a minimum following the Government's undertakings at the Glasgow COP 21 conference. To help to achieve this –
 - (i) ***the number of currently unoccupied dwellings in the Greater Cambridge area should be properly taken into account within the 'in the pipeline' figure and***
 - (ii) ***the number of new dwellings in addition to that calculated according to the Standard Method should be as far as possible secured to the sole occupation of the***

families of employees of scientific and technical undertakings in the fields of life sciences and health care.

5. The effect of the visual image used in the public presentation of the proposals the Smart Survey and other public documents is examined. The image shows a graphic version of a tree with various benefits embedded in its foliage. It is argued that this as a misleading image as it suggests that the proposals represent to best way of achieving the benefits, whereas the benefits in question either already exist or can be achieved by other and less damaging means. The use of the image therefore indicates a significant flaw underlying the proposals.

Review of present proposals

6. The key element in the proposals is the use of a new method to be used in calculating the number of new homes required for the Greater Cambridge area up to 2041. It is set out in the GL Hearn report 'Greater Cambridge Local Plan: Housing and Employment Relationships dated November 2020 ('Hearn 1'), the basic principles of the approach being set out at paras 1.1 to 1.10.
7. The report proposes that instead of using the Government's Standard Method of calculating housing need, other economic projections from various sources as to the growth of various industries in the area are used to calculate the number of jobs which would be created by the predicted rate economic expansion. The number of homes that would then be required to support these jobs is calculated from that figure by using the Standard Method in reverse.
8. The approach by the Hearn 1 study in relation to economic projections was to consider estimates of historic employment by various organisations such as the Business Register and Employment Survey (BRES), the Centre for Business Research (CBR), a study by CBR using 'blended' data from CBR and BRES, an East of England Forecasting Model that relies substantially on BRES and Cambridge Economics' own estimates, similar to those underpinning BRES. These five datasets had broadly similar views on employment levels in 2017 but their rates of change back to 2011 differed, "... *making future forecasting problematic.*" The EEFM is an integrated model for economic, demographic and housing trends and uses forecasts by Cambridge Economics but can fail to account for rapid change occurring in some sectors.
9. The Hearn reports do not contain any reference to use of this method to date by other planning authorities, and we do not know of any such previous use.
10. The results of each of the two methods of calculating future increases in population and job numbers are very different. The Government's Standard Method of calculating needs for homes and jobs for the period 2021 – 2041 would indicate an additional 45,800 jobs, supported by an additional 36,600 homes (Hearn 1 para 3.72 at p 32).

11. The economic-forecast-based method however would indicate the number of jobs needing to be 'supported' is much greater. Table 17 of the report at p 37 shows the more conservative 'central' estimate is 58,441 jobs while the 'higher' estimate (as explained at para 4.9) is 78,742 jobs.
12. To calculate the number of new homes that would be required to support these jobs, the Standard Method has then simply been applied in reverse, 'translating' this figure into a labour supply and population growth by taking into account the factors of unemployment numbers, double jobbing, commuting patterns and levels of economic activity.
13. The effect of commuting for the additional jobs created can be calculated by two possible methods. One is to assume the commuting patterns shown in the 2011 census remain substantially the same. The other is to assume a 1:1 relationship between jobs growth and the number of economically active residents (ie Greater Cambridge would not draw in any additional labour above that already assumed by applying the Standard Method and existing patterns).
14. The numbers of additional economically active residents needed to 'support' the number of jobs predicted in Greater Cambridge, applying all factors including the '2011 census' commuting assumption are shown in Table 18 as 45,552 ('central' figure) and 63,938 ('higher' figure). Table 19 shows the figures using the '1:1 relationship' commuting assumption. They are somewhat greater – 49,341 ('central' figure) and 68,525 ('higher' figure).
15. The annual housing growth needed to accommodate these future employees is set out in Table 22 and Table 23 on p 40 of the report. Over the 20-year period to 2041 this annual figure would require, using the 2011 census commuting pattern, 1996 x 20 dwellings ('central' figure) and 76,470 dwellings ('Higher' figure) and using the '1:1 relationship' commuting pattern, 42,222 dwellings ('central' figure) and 53,800 dwellings ('higher' figure).
16. The Report on the Greater Cambridge Local Plan: First Proposals (Preferred Options) prepared for consultation by the Joint Director of Planning and Economic Development concludes (at p 5 - Development Strategy) that the need for jobs and homes in the context of national planning policy and guidance is 58,500 jobs and 44,400 homes. This figure of 44,400 for the number of new homes is reasonably close to the 'Central' figure using the '1-1' commuting ratio and based on Table 23 of Hearn 1.
17. However an earlier document, the Local Plan 'Issues and Options 2020' document states at the Executive Summary:

“One big question affecting all these themes (Climate Change, Biodiversity and Green Spaces, Wellbeing and Social Inclusion and Great Places) will be the number of jobs and homes to plan for. Central Government has set us the target of planning for a minimum of around 41,000 homes between 2017 and 2040. We are doing more work to understand future jobs growth

and housing growth to support it. However, to give an indication, if the recent high jobs growth was to continue, there may be a case for making provision beyond the local housing need to include flexibility in the plan and provide for about 66,000 homes during this period. We already have about 36,400 homes in the pipeline for this period, but it will be for the new Plan to find sites for the rest.”

18. The same passage also appears in the ‘First Conversation’ document published in January 2020, which includes a Welcome from Cllrs Tumi Hawkings and Katie Thornburrow.
19. As the Development Strategy Options Summary Report makes clear, the Councils have not at this stage reached any view on the preferred approach for the new Local Plan, so it seems that the possibility of ‘including flexibility in the plan’ allowing for 66,000 new homes as stated in the First Conversation document remains in the background.
20. This figure of 58,500 jobs is very close to the 58,441, the ‘central’ figure for Greater Cambridge in Table 17 of the GL Hearn report, and the annual number of new dwellings required is said to be 2,111, the ‘central’ figure in Table 23 of the report. An annual 2111 new dwellings over the 20-year period would produce a total of 42,220.
21. We therefore have several actively considered figures for the required number of new dwellings up to 2041. They are:

According to the Standard Method calculation –

1743 per annum x 20 = 34,860 (Hearn 1 Table 1)

‘Reverse Standard Method’ based on projected job figures -

‘Central’ figure (2011 commuting assumptions) : 1,996 pa x 20 = 39,920 (Hearn 1 Table 22)

‘Central’ figure based on ‘1–1’ commuting ratio: 2,111 pa x 20 = 42,222 (Hearn 1 Table 23)

‘Higher’ figure (2011 commuting assumptions): 2,549 pa x 20 = 50,980 (Hearn 1 Table 22)

‘Higher’ figure based on ‘1-1’ commuting ratio: 2,690 pa x 20 = 53,800 (Hearn 1 Table 23)

In the background -

Local Plan – Issues and Options 2020: 66,000

Some official figures giving a different view

21. The employment forecasts referred to in section 5 of the Hearn EL and EN Study certainly appear to provide strong evidence of such dynamic growth over the period to 2041. The most striking information in the Study report (para 5.8) is that the 2018 Local Plan drew on EEFM data which assumed that 44,100 jobs would be created between 2-11 and 2031, in fact 35,800 jobs had been created between 2011 and 2017, 81% of the total. This observation, which tests the accuracy of previous forecasts in the light of subsequent developments, is strong and convincing and points to a rate of growth in areas such as life sciences (Health and Care and Research and Development) which is far stronger than predicted.
22. Nevertheless there must be strong reservations about the advisability of basing the planning policy for 2021 -2041 entirely on the figures set out in Hearn 1. It should be remembered that the Standard Method was introduced by the Government in 2017 in order to set an ‘ambitious

target' of providing 300,000 new homes across the whole of the UK. Far from being an outdated formula, it is a recently set, ambitious target calculated to meet the needs of an expanding economy.

- 23 In the circumstances it is worth bearing in mind that other statistical exercises on this question have had a very different result.
- 24 In August 2020 Robert Jenrick, Secretary of State for Housing, Communities and Local Government introduced a White Paper *Planning for the Future*. In the Introduction Mr Jenrick said that his aim was, “... *tackling head-on the shortage of beautiful, high-quality homes and places where people want to live and work ... supporting sustainable growth in all parts of the country and rebalancing the economy*”. The White Paper proposed inter alia that the Standard Method of calculating housing need should be revised to help to achieve this aim.
- 25 On 1st October that year the House of Commons Library published an analysis by the firm Litchfields which compared the results when applying the present Standard method with the results when applying the proposed Standard Method to calculate housing need in all Local Authorities. Using the current method, the new housing need for Cambridge was 1,085 homes annually while the proposed method showed the annual need was 745 per year, **an actual decrease of 312 or 29%**. For South Cambridgeshire the current method showed an annual need of 658 a year while the proposed method showed an annual need of 745, **an increase of 87 or 13%**.
- 26 In other words the recently proposed method of calculating housing need, designed to achieve the aims as stated by Mr Jenrick above for all parts of the country, would show that the Greater Cambridge area should plan for an **annual reduction of 225** in the number of new dwellings planned for the area.
- 27 It would appear from the disparity between the authorities cited above that the Councils would be well advised to take seriously the qualification expressed on employment levels and therefore housing need in the Hearn 2 report at para 5.5:
“Although the above data sets have broadly similar views on the level of employment at 2017, the count and therefore the rate of change differed substantially, making future forecasting problematic.”

Consequences of adopting the present proposals

- 28 If we assume, however, that the figure of 44,400 new homes is the one finally adopted as policy, what are the consequences of this decision?
- 29 Our first concern is for the environment. The central concern of this year's Glasgow COP Conference was to restrain the increase in Co2 emissions to 1.5% of the pre-industrial level. At the conclusion, the most optimistic answer to the question 'Is 1.5 alive?' was that it was on life support.

- 30 The National Planning Policy Framework (NPPF) states at para 7 that the purpose of the planning system is to contribute to the achievement of sustainable development, sustainable development being defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 31 The current continual occurrence of floods, fires, droughts and destructive storms over much of the globe already severely restricts the ability of many of even this generation to meet their own needs, and it can scarcely be doubted that any increase in Co2 emissions over 1.5% will further compromise present and future generations and must therefore inevitably be characterised as unsustainable.
- 32 Para 2 of the NPPF states inter alia that planning policies must reflect international obligations, which we believe includes the undertakings made by the UK at the Glasgow COP Conference. Within the UK, the carbon budget set out in the legislation of June 2021 requires that emissions are reduced by 63% by 2035. The need to achieve the true purpose of the planning system, to contribute to sustainable development, must mean that in the current situation there is a particularly urgent duty on planning authorities to take the strongest and most rigorous means of ensuring that the carbon footprint of any development, whether arising from its nature or its extent, must be kept to its absolute minimum.
- 33 The present proposal is that 44,400 new homes are to be constructed over the 20 years to 2041. According to an article by Sir Mike Berners-Lee in the Guardian on 14/10/2010 to build a simple two-bedroom cottage at that time, ie the production of the materials and the construction of the building, would create 80 metric tonnes of embodied Co2, and the building would then emit 2,5 metric tonnes of Co2 annually.
- 34 The UK Green Building Council's 2021 'Construction Carbon' report says that since that time, *"efforts to improve the energy of buildings has seen an impact on operational Co2 emissions while embodied carbon (ie that created by producing the construction materials and by the building process itself) have remained stubbornly consistent at 50MtCo2e."*
- 35 According to Hearn 1 above, the Government Standard Method of calculating housing need would produce a figure of 34,860 new homes. The current proposal is to build 44,400 new homes, ie 9,640 additional to the Standard Method figure. If this were rounded up in practice to 10,000 additional homes, a conservative estimate of the additional Co2 created can be calculated on the assumption that since 2010 the amount of embodied carbon could be reduced by 25% and of operational carbon by 50%.
- 36 The above figures are included for illustration and to promote further research. On this basis, however, a conservative estimate would be that ***600,000 metric tonnes of Co2 would be produced by the initial building process and 12,500 metric tonnes would be produced annually, pro rata to construction up to 2041 and in full thereafter.***

37 To put this into context, the whole of the *City of Cambridge produced only 489,000 metric tonnes of Co2 emissions in 2019, with South Cambridgeshire producing 1,213,000 metric tonnes* – a total of 1,702,000 metric tonnes (Data Tables – UK Local and Regional Co2 Emissions published by the Department for Business and Energy June 2021). An annual addition of 12,500 metric tonnes would increase this total to 1,714,500 metric tonnes, *cancelling out almost two years of carbon reductions over the Greater Cambridge area.*

Risks and uncertainties underlying the present proposals

38 The Councils' Topic Paper 2 on Climate Change published in September 2021 refers at p 9 to s 182 of the Planning Act of 2008 which places a duty to *'secure the contribution of development and the use of land in the mitigation of climate change'*. It also acknowledges at p 10 the target set under the Climate Change Act as amended in May 2019 for reductions of emissions to net zero by 2050. We believe that the earlier duty to secure the *'contribution'* of the development to the *'mitigation'* of climate change is now far too weak to ensure the action needed to deal with the real danger that climate change now poses, and would to that extent be incompatible with the legal duty created by the target set by the May 2019 amendments to the Climate Change Act.

39 The paper refers to the March 2021 report of the Cambridge and Peterborough commission on Climate Change. In their initial recommendations they note at p 11 that, *"...the region's emissions are approximately 25% higher per person than the UK average, and that if the area continues on this trajectory, we will only have six years remaining before we have exhausted our 'allowed' share on emissions to 2050. Urgent action is therefore required, with the report noting that local government powers in transport and planning, amongst others, will be critical in driving transformation."*

40 It is incumbent on the Greater Cambridge as a planning authority to be aware that the urgency of our situation with regard to climate change has altered significantly since 2008 and now to readily acknowledge the implications of the later legislation.

41 Most of the language in the Topic Paper itself however appears to be inspirational rather than informative. The environmental principles for the Oxford-Cambridge Arc include *'working towards'* a target of net zero by 2040. New settlements will *'contribute towards the achievement'* of net environmental and net carbon zero. There is a *'vision'* for Cambridge to be net carbon zero by 2030, *'subject to'* actions by Government, the regulators and industry. On p 16 it is noted that, *"... with net zero carbon comes the need to change the metrics used to define the performance of buildings. It is clear ... that buildings constructed using current metrics are not performing as they should and that a new approach is needed ..."*

42 Topic Paper 2 dealing with climate change appears to some extent to be a document of signposts rather than milestones. The signposts are useful and the result of good work, but are of questionable value as a basis for policy. Section 4.5 does set out many specific technical requirements for operational emissions, in particular the requirement that all new domestic and non-domestic buildings *'should achieve'* a space heating demand of 15 – 20 kWh per

meter squared a year in accordance with the CCC's 'Housing Fit for the Future' report. However wording such as 'should achieve' indicates that the aspirational element is still present and in relation to embodied carbon the document simply states at page 14 that '*consideration will be given*' to the carbon associated with the construction process, and acknowledges at page 17 that,

" ... there are no nationally defined targets for reducing the embodied carbon associated with new developments. A further challenge faced by the industry is a lack of consistent measurement, leading to mis-aligned benchmarks, project targets and claims."

- 43 This uncertainty with regard to fundamental environmental considerations is of course also of great concern in the case of water, in relation both to the possible – even probable - inadequacy of supply and also to the inevitable damage to the County's system of chalk streams and associated wildlife. As is highlighted in the Executive Summary to the GCLP: First Proposals (Preferred Options) (Regulation 18) consultation paper:

"The First Proposals make clear that the proposed development strategy is contingent upon there being clear evidence that water supply challenges can be addressed before the plan moves to the draft plan stage."

Absence of usual benefits of development

- 44 With regard to the proposed developments, the Hearn 1 report acknowledges at para 3.68 that as far as unemployment is concerned, *"for the purposes of this report it has been assumed that there are no changes in the number of people who are unemployed moving forward from 2020 to 2041"*.
- 45 It is also argued that the housing situation in Greater Cambridge is subject to the pressures of a speculative bubble which is of no benefit to the majority of ordinary residents and that the proposed development offers little in the way of relief because of the distorting effects of speculation.
- 46 As the Hearne HER Report makes clear at para 3.4, the 'affordability' step in the Standard Method already makes provision for increase in housing to the point where dwellings become affordable by applying a formula which relates the local median price of homes to median workplace earnings.
- 47 Further, the Report states in relation to employment figures at para 3.68 that, *"The analysis shows a clear increase in unemployment until about 2010 -11 and that since then the number of unemployed people was back close to (or below) the level observed in 2004. This would indicate that there may be limited scope for further improvements and for the purpose of analysis in this report it has been assumed that there are no changed in the number of people who are unemployed moving forward from 2020 to 2041."*

48 It is therefore difficult to see that any departure from the Standard Method of assessing housing need can be justified either in relation to any improvement in housing provision for the existing or predicted population or in relation to any reduction in unemployment figures in the joint planning area.

The decision facing the planning authority

49 The Greater Cambridge as a planning authority is now in an unusual and critically important position. It has to make its decisions where we can see an unprecedented risk of harm to the environment but can also see unprecedented opportunity for nurturing scientific developments which can bring huge benefits to human society in the UK and the world.

50 There is a third factor however which complicates the situation and makes decisions and policy implementation still more difficult. This is the development, in parallel with the expansion of scientific and technical research in the area, of a speculative property bubble, as a result of which property in Cambridge can become, and in many cases has become, simply a vehicle for opportunistic speculative investment, of no benefit either to ordinary residents or to the scientific community. Construction and development of property for this purpose contributes to the damage to the environment without furthering or supporting scientific and technical research.

51 In light of this, the aim must be to influence future job creation in such a way as to achieve the best possible outcome, not only in terms of the prosperity and wellbeing of the planning area itself but also in terms of a proper contribution to the prosperity and wellbeing of the UK as a whole.

52 The challenge now facing the Greater Cambridge planning authority is, in the current critical post-COP 21 situation, to balance these three factors so as to achieve the optimum outcome in relation to the economic, social and environmental objectives as set out at para 8 of the National Planning Policy Framework (NPPF).

53 It would appear, therefore, that interests of the scientific and technological and also the environmental factors would be better promoted, and the influence of the third factor – the speculative property bubble – restrained, by a decision to take the following measures:

- i. To ensure that the total of existing unoccupied dwellings (above the normal percentage to allow for turnover) was established and included in the 'already in the pipeline' figure in calculating the number of new dwellings required, and to explore all possible means, by incentive, penalty or otherwise, of ensuring that such unoccupied dwellings are let or sold within a reasonable time, and
- ii. To set the requirement for the number of additional new dwellings above that set by the application of the Government Standard Method at the number of new dwellings directly and specifically related to identified and authentic

scientific and research undertakings in the Greater Cambridge planning area, with the future sale of such dwellings restricted by covenant or otherwise to purchasers primarily employed in such undertakings.

- 54 The effect of the first measure would be to allow the most realistic figure to be arrived at for the number of new dwellings required, while the second measure would operate to restrain unjustified speculative building while at the same time sustaining scientific and technological research and development. The fact that new employees in scientific and technical undertakings could be properly housed outside the conventional housing market would of course to that extent reduce the number of buyers in the conventional market and so operate to increase affordability.
- 55 The second measure would appear to be appropriate in relation to developments such as the Addenbrooke's Hospital and Cambridge Biomedical Campus, Brabraham Research Campus, the Wellcome Trust Genome Campus, Granta Park, Sagentia Research Park, Melbourne Science Park, St John's Innovation Park and the Cambridge Science Park.
- 56 A policy of allowing certain new dwellings only if they are to be occupied by people employed in a certain industry would be similar to existing policies in relation to new dwellings for employees in the agricultural industry, and would be amply justified by the particular situation in the Greater Cambridge area relation to the need to promote local scientific industries in the critical context of current climate change.
- 57 Planning conditions used to achieve the purpose of the second measure set out at (ii) above would we believe be based on considerations which would satisfy the test as material considerations established in *Newbury DC v SoS for the Environment [1981] HL* and in *R (Wright) v Forest of Dean DC and Resilient Energy Severndale Ltd [2019] UKSC*.
- 58 It must be the case that permissibility of the developments in all proposed sites in the joint planning area is contingent upon this, as even where a particular development itself is found to meet all relevant planning criteria, its permissibility will automatically fall into question if the overall increase in number of dwellings over the period to 2041 cannot be justified in planning terms.

Images – inspiring or misleading? The underlying flaw in the proposals

- 59 In its public presentation of the current proposals, the Planning Authority has used a striking image which appears in the Opus consultation document 'Greater Cambridge 2041' above the words 'Our Vision', on the front of the Smart Survey document in the First Proposals and in the Summary of the GCLP Issues and Options 2020. It is of a tree with four areas of leafy vegetation, the top one being 'Climate Change', the second 'Biodiversity & Green Spaces', the third 'Wellbeing & Social Inclusion' and the fourth 'Great Places'.

- 60 There are two messages conveyed by the tree image. The first is that the tree – which symbolises the proposals – will bring four benefits, ie an improvement of our position with regard to climate change, provision biodiversity and green spaces, the fostering of wellbeing and social inclusion and the creation great places. The second message conveyed by the tree is that the tree, ie the proposals, is/are the essential means by we can achieve these benefits.
- 61 The image is misleading because either we already have the benefits are promised, without the implementation of the proposals, or they can be achieved by other simpler and less destructive means. In fact the proposals will degrade, to an indeterminate extent, our position with regard to climate change. The biodiversity and green spaces already exist. The ‘great places’ already exist and the proposals will to an indeterminate extent urbanise them. Any improvement in wellbeing and social inclusion can and should be achieved by simpler and more practical measures which operate on a smaller scale and answer to the real needs of the people they are meant to serve, one example being community and mutual schemes to reduce unemployment in the Arbury ward which the Hearn 1 report says will not be changed by the proposals.
- 62 It is of course to be welcomed that any development will have well-constructed, well-designed buildings, and will be planned in such a way as to promote and sustain wellbeing and a thriving local community. It would however be wrong to attempt to justify the proposals in these terms, because the benefits shown on the tree either already exist, and would be inevitably diminished by the proposals, or they can be achieved by other simpler and less otherwise harmful means.
- 63 The only justification for the construction of more dwellings than the Standard Method requires is the need to foster and sustain the remarkable advances in life sciences and healthcare led by the particular strength of scientific and technical expertise in Cambridge and the surrounding area. The Planning authority should use all its powers to ensure that the number of additional dwellings is sufficient for this purpose but should not go beyond it, as to do so would inevitably, to a greater or lesser extent, imperil our position with regard to climate change at this critical time.

M J Lynch

10/11/2021