

Growth and the Local Plan

Initial Analysis

- ❖ The Trumpington Residents’ Association has recently expressed significant concern about the level of growth which appears to be envisaged by the authorities – in responses to the Combined Authority’s draft Local Transport Plan and the Cambridge Biomedical Campus’s Transport Strategy 2018. Further inquiry since then has added to this concern on my part.

- ❖ The “higher level of ambition for economic growth and development” up to 2050 set by the Combined Authority goes well beyond that currently planned, so that in Cambridgeshire and Peterborough “... economic output will double over the next 25 years, with an uplift in GVA (Gross Value Added) from £22 bn (billion a year) to over £40bn.” (Strategic Spatial Framework (Non-Statutory) Phase One, page 46) This aim has been agreed with the Government as part of the Devolution Deal leading to the Authority’s creation. It also appears to have been agreed with the local authorities in Cambridgeshire & Peterborough. (Framework, page 5; and Combined Authority Board decision of 28th March 2018, which required the “unanimous consent of constituent council members” to adoption of the Framework, including Cambridge City Council and South Cambridgeshire District Council). Phase Two of the Framework, which is working to the same growth ambition, is yet to report.

- ❖ Since this note was first written, it has been confirmed that Cambridge City Council and South Cambridgeshire District Council *are* signed up to this “higher level of ambition for economic growth and development”. It is reasonable to assume that, in practice, this inclines them towards the top end of the growth range well above the government's "standard method" minimum target of 1,800 new homes per year (40,900 homes in the Plan period 2017 - 2040) from the present adopted Plans 1,675 per year - to the top end of the range at 2,900 new homes per year (66,700 over the same period). There are “120,790 homes in Greater Cambridge today”, so an increase at the top end of this range would be an increase of 55 per cent from now to 2040, i.e. over 20 years.

“To give a sense of the scale of this potential additional provision, Orchard Park in the north of Cambridge is around 1,000 homes, whilst the total number of homes on the Cambridge Southern Fringe developments is around 4,000 ... The new town at Northstowe when complete will be around 10,000 homes. Our current pipeline forecasts do not include North East Cambridge ... or Cambridge Airport ... and both of these may provide a significant number of new homes.”

66,700 homes are equivalent to nearly 17 Southern Fringe developments, or 7 Northstowes.

[Greater Cambridge Local Plan, “The first conversation”, issues and options consultation document, January 2020, pages 4, 59, 61 & 62]

- ❖ The economic growth that underlies this is expected to be “disproportionately located” in “six key districts” in Cambridge. These are: “Cambridge City Centre”; “Cambridge Station, CB1 and Hills Road”; “Cambridge Biomedical Campus and Southern Fringe”; “Cambridge Science Park and Northern Fringe”; “West Cambridge”; and “Cambridge East”.

“Collectively, these sites account for 63% of all jobs within the Cambridge urban area, and 40% of all jobs within Greater Cambridge. Growth is expected to be disproportionately located in these areas, which benefit from agglomeration and good labour market accessibility.”

“Future growth is expected to be focused at such sites.”

[Local Transport Plan, pages 94 & 96]

- ❖ While “The first conversation” Local Plan consultation document does not express a preference for location of the associated housing development, it is clear that there will be great pressure to locate it as close as possible to these areas of economic growth. One evidence of this comes from the Combined Authority:

“The Combined Authority has also stated its ambition for everyone to have access to a good job within easy reach of home. To achieve this will require not only an increasing level of jobs, but also provision of high-quality housing and commercial spaces within and near existing communities to accommodate a growing population and workforce.” [Local Transport Plan, page 14]

- ❖ Here and now, the “six key districts” are struggling with the inability to date to reduce private vehicle traffic and peak congestion levels - and to provide adequate public transport; one evidence of the severe disconnect within our system between land use and transport planning. The Greater Cambridge Partnership’s peak traffic reduction target, which was 10 per cent below 2011 levels, is now nearly 25 per cent below current levels to provide the conditions essential for a reliable and frequent bus service, which is a key part of the public transport repertoire – as the Combined Authority and the Greater Cambridge Partnership rightly emphasize. [“Strategic Bus Review”; and “Choices for Better Journeys”]
- ❖ The Combined Authority is responsible for deciding its area’s non- statutory Strategic Spatial Framework prepared in the planning context set by the Government’s National Planning Policy Framework, within which local planning authorities are required to plan - and of which the Government takes account in the employment and housing targets it sets for planning authorities. “At the heart of” the NPPF “is a presumption in favour of *sustainable* development”. [My emphasis] Its “core principles” include a responsibility on planning authorities to “proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.” (NPPF, pages 4 & 5) The Combined Authority is also responsible for the statutory Local Transport Plan, which “is intended to support” the higher level of ambition for economic growth and development it has set. (Local Transport Plan, page 10)

- ❖ The Cambridge Biomedical Campus “key district” is in Trumpington’s “backyard”. The Campus’s “... ambition is to become one of the largest internationally competitive concentrations of healthcare-related talent and enterprise in Europe...” (Campus Transport Strategy and Implementation Plan, 2018, page 9) It is currently implementing the Campus’s approved extension which will increase the number of staff working there from 17,250 now to 26,000 by 2031 and up to 30,000 beyond then (building on the 56% growth in jobs on the Campus between 2011 and 2020 anticipated in the 2017 draft Transport Strategy).

- ❖ The currently approved Local Plans for Cambridge City and South Cambridgeshire District Council already provide for growth up to 2031 of 33,500 homes, and 22,100 net additional jobs in Cambridge City. South Cambridgeshire’s Local Plan adds significantly to the growth in jobs. As noted above, essential infrastructure is struggling to keep pace with, let alone manage this growth effectively – with traffic congestion at peak times having already increased by 15 per cent approximately since 2011, now requiring an overall reduction of one quarter to meet the Greater Cambridge Partnership’s congestion reduction target.

- ❖ The Combined Authority’s plans are influenced by the Cambridgeshire and Peterborough Independent Economic Commission it set up to give advice. The Commission’s Report, whose terms of reference were set by the Authority, was adopted by the Authority in 2018. The terms ask how high economic growth rates are to continue to be achieved, not whether they should be, and make no reference to the environment or climate change – a fact fully reflected in the pages of the Commission’s Report which, astonishingly, contain no substantive mention of the environment or climate change. Its conclusions include the following –
 - “Cambridge is at a decisive moment in its history where it must choose whether it wants to once again reshape itself for growth, or let itself stagnate and potentially wither ...” (Report, Executive Summary, ninth page)
 - “... a dispersal strategy (for spatial development) is unlikely to be successful, as it is “agglomeration” ... that attracts companies to the area. Other options, such as densification, fringe growth, and transport corridors all have potential benefits, and should be pursued to an extent, though none should be taken to its extreme.” (tenth page)

[COMMENT: Dispersal of housing development to significant clusters to conserve Cambridge’s “special character” and the Green Belt separation between Cambridge and its “necklace of villages”, are fundamental to the current adopted Local Plan - following major releases of land from the Green Belt in the 2006 Local Plan in the “Southern Fringe”, which are reaching fruition now. To date the City Council has resisted further releases of land from the Green Belt for development. Further “agglomeration” associated with growth of the Cambridge Biomedical Campus, “fringe growth” and, possibly to a lesser extent, “transport corridors” would be direct threats to the remaining area of Trumpington’s Green Belt.]
 - “... the local business environment is unique in the UK ... with a business growth which is self-perpetuating and strongly supported by local characteristics ... many

innovation-rich firms, if pushed to move, would relocate abroad. This highlights the importance of this area to the national economy ..." (tenth page) "... the knowledge-intensive sectors in and around Cambridge and the southern part of the area are strongly clustered, densifying and highly dependent on their location ... it is Cambridge or overseas." (Eleventh page) "Ensuring that Cambridge continues to deliver for KI (knowledge intensive) businesses should be considered a nationally strategic priority." (Eleventh page)

- "... the levels of planned housing are insufficiently high to accommodate the existing, let alone anticipated growth in the economy ... We believe the accumulated housing deficit in Cambridge and Peterborough is so acute that the local authorities should re-examine their assessments of housing need, setting higher numbers, which at least reflect under-delivery." (Twelfth page)
 - "A package of transport and other infrastructure projects to alleviate the growing pains of Greater Cambridge should be considered the single most important infrastructure priority facing the Combined authority in the short to medium term." (Thirteenth page)
 - The conclusions and recommendations on health and well-being, education and skills are scant. There are no conclusions or recommendations on the environment or climate change. (Fourteenth to seventeenth pages)
- ❖ It appears that as far as the Combined Authority and its Independent Economic Commission are concerned, the high level and form of economic growth and development in and around Cambridge it envisages, are already a done deal – at the outset of the process to review and renew the 2017 – 2040 Cambridge and South Cambridgeshire Local Plan and before the public have had our say.
- ❖ It also seems possible that, in practice, Cambridge City Council and South Cambridgeshire District Council, as constituent members of the Combined Authority, are already signed up to the higher level of economic growth and development as the basis for our joint Local Plan. Though this is not stated in the consultation document, the "First conversation" does say:

"The Councils have committed to a goal of doubling the total economic output of the Cambridgeshire and Peterborough area over 25 years (measured as Gross Value Added – GVA – which measures the value of goods and services produced in the area). This vision formed part of the devolution deal with government which created the Cambridgeshire and Peterborough Combined Authority. It has implications for future jobs and homes growth in our area." [Page 51]

While this high ambition level of economic growth and its associated housing growth might be one proposition, alternative futures with lower levels of growth must also be assessed before this keystone to the new Local Plan is put in place.

- ❖ It is unfortunate that this "first conversation" does not include a sufficiently incisive question to ensure that consultees views on these alternative futures are tested adequately. Instead, it blandly asks:

“24. How important do you think continuing economic growth is for the next Local Plan? Please choose from the following options: Very important / Somewhat important / Neither important nor unimportant / Somewhat unimportant / Not at all important”

“32. Do you think we should plan for a higher number of homes than the minimum required by the government, to provide flexibility to support the growing economy? Please choose from the following options: Yes, strongly agree / Yes, somewhat agree / Neither agree nor disagree / No, somewhat disagree” [This question also omits a “No, strongly disagree” option]

Given their lack of context, the form of these questions makes it likely that there will be a significant number of positive answers from which it will not be possible to discern what level of growth the public in the Greater Cambridge area prefers, if any.

- ❖ It is also notable that there are no climate change and environmental impact assessments of these options in the “The first conversation”, with which to inform our choice. The assessments which are reported relate to elements within the Plan rather than total impacts of different growth options, or to a comparison with “likely evolution without the Local Plan”. Therefore, the sustainability assessment framework proposed for the various stages of the Local Plan’s development appears at first sight to be significantly deficient. Impact assessments at a high level of whole growth options seem essential but are not proposed. [Sustainability Appraisal of Issues and Options: Non-Technical Summary, November 2019; Sustainability Appraisal Scoping Report: Non-Technical Summary, December 2019]
- ❖ So, in this vital regard, we will be boxing in the dark.

Recommendations

In light of this analysis, I believe that in our response to the “Greater Cambridge Local Plan: The first conversation”, the Association should:

- Express considerable concern at the implications for Trumpington in particular and Greater Cambridge in general of the “higher level of economic growth and development” which the Cambridgeshire and Peterborough Combined Authority plans for the Greater Cambridge area up to 2050 in its “Strategic Spatial Framework” and “Growth Ambition Statement” - to delivery of which Cambridge City Council and South Cambridgeshire District Council state they are committed;
- Note with considerable concern the potential incompatibility between this growth level and: the Intergovernmental Climate Change Panel’s call to cut global emissions in half by 2030 to have a chance of keeping global heating within safe limits; the Combined Authority’s own less precise commitment “... to significantly reduce greenhouse gas emissions by 2050”; and Cambridge City Council’s Declaration of a Climate Emergency;
- Urge that the Cambridge and South Cambridgeshire Local Plan now in preparation, does not accept as its basis this high level of economic growth and development, as reflected in the

“First conversation’s” suggestion that “flexibility (be included) in the plan and provide 66,700 new homes during this period” (2017 – 2040); and

- Ask that serious consideration be given to lower growth options for alternative futures including: (i) constraining jobs and housing growth within the already considerable level planned by 2031 in the currently approved Local Plan (33,500 homes between 2011 and 2031); and (ii) the government’s minimum housing growth target identified through its new “standard method” of around 41,000 new homes between 2017 and 2040 [“The first conversation”, pages 4 & 60/61];
- Recommend that alternative futures to the high level and form of economic growth and development in and around Cambridge envisaged in the Strategic Spatial Framework are assessed and the findings made public before this keystone to the new Local Plan is put in place, including the options specified in the preceding paragraph. This assessment to be at whole option level to allow informed comparison between them, and to include a full environment and climate change impact assessment;
- Reiterates its position that “... growth on or nearby the (Cambridge Biomedical) Campus ... be restrained within the capacity of (its) ... currently approved extension.” [TRA Comments on the “Cambridge Biomedical Campus Transport Strategy and 5-Year Implementation Plan 2018”, 5th December 2019]

As this note concentrates on the total of growth in jobs and housing to be planned for, there may be other comments the Association will wish to include in our response, such as the form and location of growth, and environmental / climate change mitigation.

David Plank

24th January 2020