

# FeCRA – The Federation of Cambridge Residents' Associations



## Greater Cambridge Local Plan response by the Federation of Cambridge Residents Associations

<http://fecra.org.uk/>

Today, almost 100 resident associations and community groups are part of the FeCRA network, a grassroots civic voice for everyone in Cambridge — and also for its environment. Residents want a say in shaping Cambridge, to ensure that it develops in a way that will achieve balanced communities and quality of life.

This response to the Greater Cambridge Local Plan focuses on concerns shared with us by our members and presented at the Local Plan Big Debate.

### The Big Themes

All four key issues are important, but residents tell us they want to see the climate and biodiversity emergencies recognised as a priority for the Plan. There is concern about the lack of vision, and what appears to be a piecemeal and growth-driven, interest-led, approach, which lacks coherence and strategy and appears to pay only lip service to the acknowledged need to address the biodiversity and climate emergencies.

### Setting limits – level of growth

In this context, ‘how much development can be sustained’ is not the right question, and neither is ‘how much building is needed?’ The right way forward is to assess the impacts and issues arising from current and already approved growth. Without this evidence it is impossible to identify the key issues or parameters that would make future development sustainable.

The current work on evidence for the Local Plan considers only housing growth. It should address environmental capacity, the impact of transport proposals, current growth ambitions, the need to address climate change, and Cambridge’s historic environment, before credible issues and options can be identified.

The implications of possible projected growth are not made clear in the consultation, making it difficult for residents to understand the different options and the impact they may have. They would like to have information and transparency about the full projections of the total homes mandated by the government, and those that are planned or already approved. Without this information the consultation is flawed - how is it possible for people to engage with the Plan in any meaningful way?

Many residents tell us they are concerned about the unquestioned assumption in the explanatory document that the current fast rate of growth will continue or even accelerate. They say that the very qualities of life and environment that have made Cambridge unique don't scale and ever-increasing growth will make the city a victim of its own success. The benefits of rapid growth for a small city are unproven, the costs are obvious. The pressures on the quality of life in the city centre, including the impact of mass tourism and the water crisis require restraint rather than increasing the level of growth within the plan area.

### **Housing and quality of development**

Residents say the Plan should be about creating communities and streets, not high rises or Trump Towers and should also support biodiversity and wildlife corridors. The back gardens of the city's houses are important wildlife corridors and this does not correlate with strategies in this consultation calling for densification.

Plans for new housing should reflect the needs of a mixed community not just new workers and promote integration, particularly of older people and a range of income groups, through a mix of tenures and housing types which avoids ghettoisation.

The Council's commitment to policies on addressing the climate emergency requires action now to set standards of building insulation, heating/cooling, water recycling, permeable surfaces - 2040 is too late and interim targets need to be set to meet the scientifically agreed minimum reduction in carbon emissions of 50% by 2030. Any meaningful measure must also include the carbon embedded in building material and emitted during construction.

All new developments should have the highest standards of water efficiency to minimise the use of water abstracted from the chalk aquifer, including use of rainwater and grey-water recycling. Large new developments should incorporate permeable paving and urban drainage systems to help water percolate back into the soil.

Opportunities for tree planting should be maximised within new developments and development should be designed to respect the value of trees, hedges and grass meadowland as valuable habitats and important for biodiversity.

The next Local Plan must include a Historic Environment Strategy as required in the National Planning Policy Framework to ensure we retain the essential character of our streets, public spaces and green infrastructure.

There should be no more new hotels/apartments for tourists, and a management strategy should be put in place which recognises that there are significant constraints in a small historic city on the number of visitors that can be assimilated without harm.

### **Employment and business growth**

New office developments should be permitted only if a real employment need can be demonstrated. There is no clear evidence for a strategy of intensification of population growth within or close to Cambridge itself instead of dispersal of growth to surrounding small towns that already have good transport links. Market towns on train lines near Cambridge could be attractive

centres for knowledge workers and tech businesses. They have identities, a sense of place and character, and could benefit from investment.

The CPIER report gave no systematic evidence in favour of doubling the population of Cambridge without commensurate expansion of infrastructure. There was simply an assertion that tech firms will leave the UK if they cannot be located within or close to Cambridge. However, there appears to be no research evidence for this other than that proximity used to be a benefit to businesses in the early days of the Cambridge Phenomenon. Academics with expertise in this area question if there is current evidence to support the assertion that tech firms would leave if they cannot be crowded into Cambridge. They say that tech businesses are now spread throughout the region, from Ely to Royston, Newmarket to St Ives and should be supported and that Cambridge should be building on shared connectivity, sharing and spreading prosperity whilst maintaining the city's ingredients of success. They question to what extent the evidence provided for the CPIER strategy has been tested or even peer reviewed.

This is important given the concerns already raised with the planning service about the conflicted role of the economic consultancy SQW ( Segal Quince & Wicksteed) in assessing the evidence base for the CPIER strategy. Senior academics also question how much growth it is realistic to plan for beyond what is already envisaged in the existing local plan. In particular, they ask how far can office development and the growth of tourism be contained at a level where economic, social and environmental well-being isn't prejudiced. Many residents believe that limit has already been reached.

### **The river and open spaces**

The Plan should recognise the need to maintain and improve open spaces, and create new ones, with clear plans to maintain them. Strategies about open spaces should be drawn up in open consultation with local residents, river and community groups and councillors and not drawn up in private by groups or "experts". Local knowledge and accountability is vital and people want to have input on what they value at an early stage, not be presented with an already decided set of options. The Thames Landscape strategy is a model of how to develop plans in a way that fully engages and works with the local community.

This is important as some of those involved in drawing up plans for "doubling nature" and parks or doing deals with college landowners, water companies and developers and site assessment may depend on funding or donations from patrons with business interests. They may benefit from "natural capital" offsetting or from managing schemes prioritised for investment and from commercialisation of the city's open spaces and its nature.

Plans for open spaces should not be handed down as "sprung plans" or seek to commercialise open spaces such as the river corridor, nature reserves or common land as "destination opportunities". Plans need to recognise that the unique semi-rural informal qualities of Cambridge's historic open spaces and its nature including the river are admired and valued all over the world and support a landscape strategy and management structures that reflect this, rather than softening up the city's precious green spaces and its green belt for commercialisation or development as is said to have happened with the Lee Valley Authority.

Despite the recent heavy rain the Cam is the only river in the country that is not back to normal flows, yet exponential growth fuels huge pressure upon our natural water supplies. Concerns about the impact of over-abstraction on the River Cam have been expressed but despite that major schemes continue to be approved.

We support the view of Cam Valley Forum that no further development should be allowed which:

- adversely affects the chemical or biological condition, or the temperature of the river's waters.
- adversely affects the river and its tributaries, its sustaining aquifers, land liable to flood, and river-side green spaces.
- adversely affects any nature reserve, woodland and semi-natural open space.
- erodes the areas of best landscape, from the south-east to south side of the city and in particular the views from Magog Trust and there should be no further development on the green space between the Biomedical Campus and Nine Wells Nature Reserve.

Prioritisation of a Gogs landscape up to the Magog Trust Land would also maintain the important views from this key approach to the city. Recreational access to this area of farmland would be of benefit to the community, and also to the landowner via the 'public good' definition in the Agriculture Bill.

### **Consultation and engagement**

The issues and options which will be identified through this Plan process will have a huge impact on the lives of local people, yet it has not been made easy for them to participate. The only first stage 'issues and options' workshop for representatives of Resident Associations was held at short notice at the start of the summer holidays in Shelford, a poor location for city residents. Very few were able to attend, and the majority of those present (over 80%) were from South Cambs Parish Councils.

There are numerous on-going consultations on transport and planning issues including several key Supplementary Planning Documents (SPDs). People feel overwhelmed, and are confused about the way all of these consultations impact on each other - there seems no overall strategy or attempt to link them together.

They are all dealing with complex issues and often presented in dense, technical documents which are difficult for busy councillors to assimilate and engage with, and often completely impenetrable to ordinary residents. This raises questions of transparency and democratic accountability.

Residents' feedback on the Plan consultation document is that the numerous questions seem daunting and contradictory – the focus on growth does not seem compatible with the stated themes of climate change, biodiversity, well-being and inclusion. Many people, including Cambridge academics, told us that they just gave up. One group provided a primer for members, which has been widely circulated.

There are widespread concerns about engagement and stakeholder feedback. We have already raised issues about the consultation process with the planning service, Deputy City Council Leader and Executive Councillor for Planning, including the fact that there seem to be many private meetings convened by non-statutory interest groups which involve officers, councillors and NGOs on key aspects of the Local Plan, including growth, water, housing, natural capital and the call for green sites.

The minutes of these are not easily available for public scrutiny, and the remit of these groups is not always transparent - there are therefore concerns that strategic decisions are being influenced by those who have a vested interest and benefit financially.

Some of those involved in the plan evidence gathering have been members of the groups who have worked on the CPIER growth agenda and/or are plan consultees working with and/or receiving funding from those promoting the growth strategy for densification, transport corridors and green belt development.

The conflicts of interest regarding evidence gathering by those with vested interests, including business groups, NGOs, transport groups and the university, will need to be managed in a way that is rigorous and transparent to ensure confidence in the data and information on which decisions will be made.

On individual planning applications, real stakeholder engagement at an early stage should be mandatory. No major development should be permitted unless the developer can show that it has done a complete stakeholder analysis and then has engaged with all identified local interests before submitting a planning application.

To aid transparency, a record of all discussions, formal or informal, between Councillors/ Officers, developers, NGOs and transport and residents groups about planning proposals should be kept and made publicly available on the City Council's website. Conflicts of interest and donor funding need to be declared in all cases.

These measures do not need to wait for the new Local Plan to be adopted; they could be implemented now.