

**DRAFT ADVICE TO EAST OF ENGLAND REGIONAL ASSEMBLY (EERA) FROM
CAMBRIDGESHIRE AUTHORITIES**

To: **Joint Cambridgeshire RSS Review Panel (CReSSP)**

Date: **7th April 2009**

From: **RSS Review Study Group**

Purpose **To consider the key elements of the formal advice on the Review of the RSS in Cambridgeshire which it is proposed to be submitted to EERA by the County Council as a Section 4(4) Authority.**

Recommendation: **That CReSSP supports the proposed outline response as set out in this report, together with any further comments agreed by members for inclusion (and noting that the response will need further amendment once the findings of the Cambridgeshire Development Study are available).**

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1. BACKGROUND

- 1.1 The studies and consultations that will feed into the Cambridgeshire advice on the RSS Review are drawing to a close.
- 1.2 This report suggests the main points of the advice that can be made emerging from the joint work undertaken so far. It is in outline only as EERA will also be provided with the detailed studies underpinning the conclusions.
- 1.3 It should be noted that some technical work is still ongoing and will be reported at the CReSSP meeting. Therefore further additions and amendment to some aspects of this report will be required.
- 1.4 The final advice will be agreed by the County Council's Cabinet on 5th May 2009.
- 1.5 The Structure of this report is based the headings in EERA's request, although not necessarily in the same order.

2.0 CONSULTATION PROCESS

- 2.1 EERA has requested an auditable account of consultation and facilitation with all relevant authorities, sub-regions and stakeholders.

Proposed Response:

Reference is made to the following:

- RSS Study Group (joint officer working group)
- 4 Joint Cambridgeshire RSS Review Panel meetings, held in public, with cross party membership
- Events held as part of the preparation of the Cambridgeshire Development Study including two stakeholder workshops and a stakeholder's economy seminar.
- A range of communication activity undertaken (October 2008 – April 2009) including information made available to the public and the provision made to receive representations via on-line forms on the County Council's web-pages relating to RSS Review.

The advice provided is based upon the following evidence:

- Feedback from workshops and RSS Study Group members as outlined above and any other representations received
- Cambridgeshire Development Study and related appendices (to be finalised in April 2009) and Interim Report (March 2009)
- Validation of Growth Scenarios for the Review of the RSS for the East of England Cambridgeshire - technical study & interim findings December 2008
- A Technical Note including topic papers prepared by the Study Group prior to the Cambridgeshire Development Study
- Initial Assessment of Call for Proposals

- Assessment of Regional Scale Settlement Study
- Schedule of evidence provided to Consultant team who prepared the Cambridgeshire Development Study

3.0 EERA's Call for Development Proposals.

3.1 EERA have asked for assessment and advice on the developer proposals submitted in the autumn of 2008. 12 of these were in Cambridgeshire.

3.2 This assessment is based on:

- i) an initial review of evidence put together by the joint study group
- ii) the testing of new settlement options in the Cambridgeshire Development Study

3.3 The initial review by the study group indicates that:

a) All of the proposals have been brought forward in some form before and have been the subject of previous assessments – the call for proposals has revealed nothing new.

b) On the basis of the evidence assessed, the proposals may be grouped by level of acceptability:

- i. With potential subject to resolution of some issues
 - North Ely CP36
 - Wintringham Park (St Neots East) CP80
- ii. Worthy of further consideration
 - Alconbury Airfield CP71
 - Waterbeach (Denny St Francis) CP88
- iii. Conflicting views in the evidence base
 - Cambourne East (Bourne Airfield) CP27
 - Cambourne West (Swansley Farm) CP76
 - Cambourne North CP51
- iv. Most serious planning challenges
 - South east Cambridge CP8
 - West of Shelford Road, Cambridge CP64
 - Mereham CP111
 - Northstowe Extension CP17
 - Hanley Grange, Hinxton CP23

c) Across all the proposals the evidence base identifies a range of common issues that give cause for concern, including: flood risk; transport implications; relationship to existing settlements; self containment, especially in employment; and landscape/Green Belt impacts.

3.4 Officer opinion amongst the local planning authorities indicates that there is little enthusiasm for new settlements. There is some acceptance of urban expansion, particularly in the market towns, although with a number of significant caveats, especially relating to infrastructure.

- East Cambridgeshire consider that a substantial increase in the size of Ely could help in delivering more infrastructure, community facilities

and jobs. East Cambridgeshire's total opposition to the Mereham proposal is well known.

- Cambridge City are concerned about further expansion of the City beyond that already planned because of the impact on the amenity of the City, limited capacity in the congested centre and effects on the Green Belt
- Huntingdonshire would support the principle of a new eco-quarter at St Neots but there are a range of difficult issues at other locations in the District
- South Cambridgeshire do not support higher levels of growth or further new settlements or expansions of new settlements, but they do support the current strategy for urban expansion of Cambridge and the development of Northstowe.

Call for Development Proposals - Conclusions

- 3.5 The assessment so far suggests that there is a much stronger case for future investment in existing towns, rather than committing resources to the creation further new settlements. Growing urban populations, within reason, may help some places reach a critical mass allowing them to support better infrastructure, services and job prospects. On this basis Ely North (2,700 + dwellings) and St Neot's East (4,000 dwellings) appear to have the greatest potential within known environmental limits. There may be other towns, not included in the developer proposals, for example in Fenland, which also have potential. *(Paragraph to be reviewed following completion of option testing in the Cambridgeshire Development Study).*
- 3.6 It is possible, at some point, that housing growth outside the capacity of expanding existing towns may need to be considered. Of the new settlements resulting from the call for proposals, those at Waterbeach (up to 12,750 dwellings) and Alconbury (5 - 6,000 dwellings) may be worthy of further consideration. (But see separately under Section 4 below, the assessment of the ARUP conclusions concerning a much larger proposal at Alconbury.) It is important though that such developments should support the high level of infrastructure improvements required and that they should not undermine the delivery of existing or planned growth projects in nearby areas. They are therefore likely be suitable only as options for the longer term. *(Paragraph to be reviewed following completion of option testing in the Cambridgeshire Development Study).*
- 3.7 The developer proposals with the greatest impacts are those suggested for large-scale extension into the Cambridge Green Belt (South East Cambridge and West of Shelford Road) and for new settlements at Hanley Grange, Mereham and the extension of Northstowe. In relation to Cambridge it should be noted that none of the peripheral urban extensions provided for in the current RSS have yet been started on the ground and the same holds true for Northstowe. An application at Mereham has been comprehensively rejected at a recent planning appeal. The Mereham location was also strongly discounted during the preparation of the 2003 Cambridgeshire and Peterborough Structure Plan. *(Paragraph to be reviewed following completion of option testing in the Cambridgeshire Development Study).*

3.8 The results of testing from the Cambridgeshire Development Study are not yet available and will be reported at the meeting.

4.0 Regional Scale Settlement Study (ARUP)

4.1 EERA have requested a response on the findings of the ARUP study as they affect Cambridgeshire. The study includes suggestions for a major development of 20,000 homes at Alconbury Airfield near Huntingdon and indicates the Cambridge area as the focus for continued regional scale growth in the long term.

4.2 A review of this study has been carried out for the joint Cambridgeshire Study Group by Brian Human. Key findings of this review can be summarised as follows:

General

a) The Study is not convincing in demonstrating that regional size settlements or expanded key centres are the answer to problems of sustainable growth.

b) The major growth strategy proposed by Arup could undermine the delivery of the existing strategy, especially around Cambridge.

c) The study is, however, fair in drawing attention to the difficulty of promoting a spatial strategy based on diverting growth pressures from the south of the County to the north and the market towns.

d) There is no compelling justification given for the need to compete with or complement centres elsewhere in the Region such as Milton Keynes, Luton, Thurrock or Southend or to show why growth is the best way to achieve this.

Cambridge

e) The study report is contradictory and lacks internal consistency about the suitability of the Cambridge area for further expansion.

f) The definition of the extent of the Cambridge area, which is set a target of 300,000 to 400,000 population is unclear especially as the Cambridge Sub-Region, including surrounding market towns, already had a population of 409,000 in 1999.

g) While the study identifies the congestion pressures affecting Cambridge and the radial routes to it, it does not consider sufficiently the limited physical capacity of the City centre to accommodate additional public transport movements and pressure on services, e.g. shopping and leisure.

Alconbury

h) There is limited technical evidence to support the choice of locations for major new settlements, no overall comparison of the benefits of the locations and no clarity about what options were considered and how the conclusions were reached.

i) The proposal for a regional scale settlement at Alconbury is both interesting and challenging.

j) The Ouse Valley offers considerable potential for development – excellent communications, a good environment and a solid core of economic activity, but this does not mean Alconbury is the right place for a major new settlement, let alone one of this size.

k) Key issues which would need to be addressed include

- impact on regeneration of the Huntingdonshire market towns
- meeting local needs
- attracting economic activity and jobs
- strategic and local transport suitability
- relevance of existing infrastructure and USAF housing on site
- fit with rural character of the area.

4.3 The survey of local planning authority officer views in Cambridgeshire indicates broad agreement with this analysis. Therefore EERA can be informed that it is the view of Cambridgeshire Authorities that there are significant flaws in the Arup study. It does not adequately justify the case for large free-standing new settlements such as Alconbury or consider alternative locations on a comparable basis. Nor does it explain with any clarity its conclusions about the scope for Cambridge centred expansion. While there are aspects which merit further investigation, the Study itself does not provide an adequate foundation for strategic options in Cambridgeshire.

5.0 Testing the housing and jobs scenarios

5.1 EERA is asking for the range of housing and jobs scenarios provided to be tested by the Strategic Authorities.

5.2 Cambridgeshire County Council commissioned SQW Consulting to assess the validity and appropriateness of the scenarios as a basis for developing strategic options for the County. The results of this assessment were reported to CReSSP on 9th January 2009.

5.3 Key points from the SQW findings can be summarised as follows:

- Modelling appears to be overstating current population and employment growth leading to overstatement in future years;
- The building rates in the highest scenarios would be extremely challenging. The highest scenario requires 37% higher housing growth than the current RSS rate.
- Modelled job growth outstrips the increase in employed residents by at least 30,000 in each scenario resulting in significant net in-commuting, especially for Cambridge City.
- A significant level of net immigration to Cambridgeshire from outside the Region is modelled in all scenarios from 5,000 to 8,200 per annum.

- The employment forecasts do not seem realistic, especially in the context of the current recession.
- *SQW Consulting* recommend that there should be a revised set of scenario runs for Cambridgeshire and the Region.
- It is likely in the view of *SQW Consulting* that house-building rates will be at a significantly reduced rate for at least two years.
- Even if building returns to 2007/8 rates, the achievement of any scenarios with household rates significantly higher than targets in the current RSS must be very uncertain.
- Further work is recommended on the viability of developments affecting contributions to infrastructure and affordable housing. (ES 18)

5.4 The initial response to EERA from Cambridgeshire therefore indicated that:

"The Council and its partner authorities have serious concerns that the high levels of jobs and housing growth we have been asked to test are unrealistic, even before taking into account the current adverse economic climate. The recession appears likely to add a further delay of at least two years in meeting any suggested targets. Moreover, the scale and concentration of job growth projected for the Cambridge area does not seem sustainable and could lead to very high levels of in-commuting." (Progress Report - 6th January 2009)

5.5 Further work by SQW Consulting and Cambridge Econometrics (CE) since January has confirmed that the higher growth scenarios are not realistic and are therefore unsuitable for testing. Moreover the employment projections they have produced, taking account of the current recession, cast doubt on the achievability of rates of jobs growth included in the current RSS as follows:

- RSS job growth in Cambridgeshire 2001 to 2021 = 75,000 (3,750 pa)
- CE trend based job growth in Cambs 2007 to 2031 = 47,300 (1,990 pa)
- CE policy based job growth in Cambs 2007 to 2031 = 38,600 (1,608 pa)

5.6 It can be noted that the preponderance of this job growth is projected to be in Cambridge and South Cambridgeshire with relatively little job growth in the remaining Districts of Fenland, East Cambridgeshire and Huntingdonshire.

5.7 The housing scenarios provided by EERA would require substantial additional numbers of housing growth by 2031, beyond what has already been committed in existing planning permissions and in existing/emerging Local Development Documents. The current commitments provide for 75,400 homes. The additions required to meet the four scenarios highlighted by EERA for testing have been calculated by Pegasus Planning as follows (overall annual rate in brackets):

- 1. RSS rate 75,000 + 23,000 homes (3,916 p.a.)
- 3. NHPAU lower 75,000 + 31,900 homes (4,291 p.a.)
- 4. NHPAU upper 75,000 + 54,000 homes (5,174 p.a.)

5. GVA based 75,000 + 44,100 homes (4,783 p.a.)

5.8 In view of the lack of realism now apparent in any of the upper scenarios, WSP have advised that they will be testing development strategies at the following much lower levels:

Base case at 75,000 commitments only (3,000 p.a.)

Low case at 75,000 + 15,000 homes (3,600 p.a.)

High case at 75,000 + 35,000 homes (4,400 p.a.)

6.0 District distribution of housing and jobs figures and sub-regional policy

6.1 EERA have requested advice on the District distribution of housing and job figures up to 2031, with determination of whether this provision is district wide or tied to the Key Centres of Development and Change (KCDCs) as defined in the RSS. (In Cambridgeshire, Cambridge is the only designated KCDC.) The advice is to include a consideration of spatial patterns and forms of development. EERA has also requested that advice should be provided on possible changes in sub-regional policy or boundaries or any new growth designation.

Housing and jobs - spatial patterns

6.2 It will not be possible to indicate a preferred distribution of housing and jobs until after the completion of option testing in the Cambridgeshire Development Study (to be reported at the meeting). This testing may not identify a single preferred option but it will be possible to indicate to EERA the distribution of homes and jobs in each option and the degree to which they are associated with the growth of Cambridge or other centres in the County. The initial options have been selected with very clear themes to demonstrate the consequences of different approaches and to allow outcomes to be distinguishable. The outline of the options selected for testing are as follows (housing totals only):

1. Base case of commitments only growth (+ 75,000 homes)

- assumes the current strategy will not be completed until 2031

2. Low market towns growth (+ 90,000 homes)

- includes a further 15,000 homes, in addition to current commitments, to be located in the market towns

3. High market towns growth (+ 110,000 homes)

- includes a further 35,000 homes in addition to current commitments, to be located in the market towns and other corridor locations

4. Low Cambridge growth (+ 90,000 homes)

- includes a further 15,000 homes, in addition to current commitments, to be located in the Green Belt close to Cambridge

5. High Cambridge growth (+ 110,000)

- includes a further 35,000 homes in addition to current commitments, to be located in the Green Belt close to Cambridge or as an extension to Northstowe

6. Low New Settlements growth (+ 90,000)

- assumes a further 15,000 homes, in addition to current commitments, to be located in new settlements at Waterbeach and Alconbury

7. High New Settlements growth (+ 110,000)

- includes a further 35,000 homes, in addition to current commitments, to be located in new settlements at Waterbeach, Alconbury, Hanley Grange and an extension to Cambourne.

- 6.3 It is possible that no particular option may emerge as preferred at this stage. The purpose of testing is to assess the impacts of different forms of development. This will help the authorities to form advice to EERA and to consider if other development strategies should be tested, perhaps combining elements from those above. *(Paragraph to be reviewed following completion of option testing in the Cambridgeshire Development Study).*

Sub-Regional policy and the framework for infrastructure investment

- 6.4 During the RSS stakeholder events and the previous meetings of CReSSP, it has been made clear that there are very strong views about the distribution of growth within the County and a desire that any strategy should benefit existing communities, including those in Fenland and other northern areas of the County. It is recognised that the RSS will guide future investment in facilities and infrastructure as well as setting the framework for the creation of new employment opportunities.
- 6.5 If any agreed strategy for the County is to take effect in the statutory development plan, it will need to be incorporated in the RSS. This will only be possible if there is an appropriate Sub-Regional chapter in the RSS document. Therefore it should be considered whether the Cambridgeshire Authorities should press EERA to change the boundaries of the existing Cambridge Sub-Region (as defined in RSS policies CSR1 - CSR4) to include the whole of Cambridgeshire. It is essential that specific strategic policies for the County should be included in the RSS.
- 6.6 However, it is emphasised that the current growth strategy for the existing Cambridge Sub Region is strongly supported. This will take development up to 2021 and beyond as set out in policies CSR1 - CSR4. The completion of development on the urban periphery of Cambridge, at Northstowe and in the market towns would therefore take precedence within any longer term RSS strategy arising from the review.

7.0 Rolling forward of existing RSS policies and extended Structure Plan policies

- 7.1 EERA have asked for views on RSS policies which should be retained or considered for amendment. A letter from the Head of Strategic Planning (on behalf of the joint study group) to EERA on this topic was reported to the March 9th meeting of CReSSP. This included a request for a review of Policy SS4 on "Towns other than key centres and Rural Areas". This is to ensure that the potential role of market towns is given significant emphasis in the

RSS.

- 7.2 Officers have also indicated to EERA that the continuation of "saved" Structure Plan policies also needs to be given consideration.
- 7.3 A number of Policies in the 2003 Peterborough and Cambridgeshire Structure Plan have been carried forward and are not subsumed within the 2008 RSS. These relate to specific issues which would not be appropriate within the RSS but had not yet incorporated in approved Local Development Documents e.g.

- Strategic Employment Locations (P2/3)
- Distribution, Warehousing and Manufacturing (P2/5)
- Transport Investment Priorities (P8/10)
- Cambridge Green Belt (P9/2b and P9/2c)
- Economic Regeneration of Chatteris (P9/5)
- Infrastructure Provision (P9/8)
- Cambridge Sub-Region Transport Strategy (P9/9)

(List not exhaustive.)

- 7.4 It is suggested that the joint study group are requested to consider the continued relevance of these Structure Plan policies and make recommendations to any future meeting of CReSSP. There is no need to provide EERA with immediate advice on this topic.

8.0 Sub-Regional, Regional and Inter-Regional Issues

- 8.1 EERA has asked the Strategic Planning authorities to take a lead where appropriate in tasks relating to Sub-Regional, Regional and Inter-Regional issues.

- 8.2 While the main focus of the RSS review work has been on Cambridgeshire, attention has been given to vital cross boundary matters as follows:

- joint working with Peterborough City Council and involvement on CReSSP
- involvement of neighbouring authorities in stakeholder events
- consultants on the Cambridgeshire Development Study have included consideration of adjoining areas. including discussion of relevant topics
- external linkages are included in the modelling work in the Study
- continued joint officer working at regional level including both County and District representation.

9.0 Infrastructure requirements and show stoppers

- 9.0 Advice on infrastructure requirements and "show-stoppers" cannot be finalised until the completion of the Cambridge Development study. However the work to date has indicate significant challenges in delivering any significant growth beyond the current strategy in most locations.

10.0 Vision and Objectives

- 10.1 EERA has not requested any specific advice on the vision of the authorities for the future development of the County or on the specific objectives we may

wish to set. However it has been a view strongly expressed through CReSSP that a clear vision should be central to our work.

- 10.2 A Spatial Planning Vision has been drafted through CReSSP which expresses aspirations for people, for the economy, for transport and accessibility, for sustainability, for the environment and for climate change. This will be further refined as studies progress. An associated set of Objectives has also been produced and these documents will both be included in the evidence provided to EERA.

Source Documents	Location
East of England Plan CReSSP reports for 9th January 2009 CReSSP reports for 6th March 2009 Other CReSSP reports for 7th April 2009	2nd Floor Park House Shire Hall Cambridge