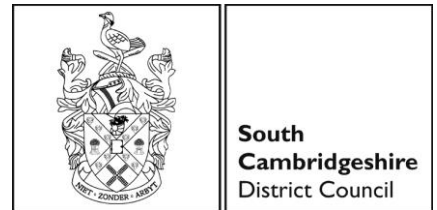


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4 January 2023

To: Chair – Councillor Stephen Drew  
Vice-Chair – Councillor Graham Cone  
Members of the Scrutiny and Overview Committee – Councillors  
Anna Bradnam, Tom Bygott, Libby Earle, Sue Ellington, Peter Fane,  
Sally Ann Hart, James Hobro, Helene Leeming, Judith Rippeth,  
Richard Stobart and Dr. Aidan Van de Weyer

Quorum: 4

Substitutes:	Councillors Heather Williams, Dr. Richard Williams, Bunty Waters, Mark Howell, Lina Nieto, Annika Osborne, Paul Bearpark, Carla Hofman, Dr Lisa Redrup and William Jackson-Wood
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### **Agenda supplement – Appendix B**

**6. Greater Cambridge Local Plan: Development Strategy Update  
(Regulation 18 Preferred Options) (Key)**

**Pages  
3 - 76**

The Scrutiny and Overview Committee is asked to review the attached draft Cabinet report, to comment upon it, and to make any recommendations that it deems appropriate.

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# Agenda Item 6



## **Greater Cambridge Local Plan Strategy topic paper**

## **Development Strategy Update (Regulation 18 Preferred Options)**

**January 2023**

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## 0 Introduction

- 0.1 This is the only topic paper produced to inform the Greater Cambridge Local Plan: Development Strategy Update (Regulation 18: Preferred Options).
- 0.2 The topic paper sets out how the preferred option for each relevant policy has been developed, and identifies the Councils' proposed position regarding the Greater Cambridge Local Plan development strategy as at December 2022. The position will be confirmed by committees in early 2023.
- 0.3 This Greater Cambridge Local Plan Strategy topic paper: Development Strategy Update provides an update to selected sections of the [Strategy Topic paper that was published in November 2021 supporting the First Proposals consultation](#). A full version of the Strategy topic paper will be prepared for the draft plan consultation, alongside topic papers for the other Local Plan 'Themes'.
- 0.4 This Strategy topic paper addresses the following policies:
- Part 1A: Overarching development strategy
    - S/JH: New jobs and homes
    - S/DS: Development Strategy
  - Part 2: Approach to site allocations supporting the preferred spatial strategy:
    - S/NEC North East Cambridge
    - S/CE Cambridge East
    - S/CBC Cambridge Biomedical Campus
- 0.5 For each policy, the sections are presented in a consistent format with sufficient information to provide a comprehensive appreciation of the background to and development of the preferred option. Each section builds upon relevant content set out in the Strategy topic paper 2021 which supported the First Proposals consultation.
- 0.6 This Strategy topic paper refers to summaries of and responses to issues arising from First Proposals representations. Greater detail on representations made can be read in the Consultation Statement published alongside this topic paper.
- 0.7 The section structure for each policy is as follows:
- Issue the Plan is seeking to respond to
  - Policy context update (identifying changes to the policy context that informed the First Proposals consultation)
  - Summary of issues arising from First Proposals responses
  - New or updated evidence

- Draft policy approach, reasons and alternatives considered (drawing on all previous sections including the policy context update, issues arising from First Proposals responses, and new or updated evidence)
- Response to issues raised in representations (N.B. While the responses to issues raised in representations are provided in a concise form, these responses draw on the detail set out in the sections referred to above)
- Further work and next steps

0.8 A Local Plan must be informed by consultation and engagement as well as statutory processes, such as Sustainability Appraisal and Habitats Regulations Assessment, and the requirements of national planning policy. Noting the limited scope of this Development Strategy Update:

- A Sustainability Appraisal Addendum has informed consideration of the relevant issues. This forms part of the overall Development Strategy Update and its key findings are summarised below.
- To assess the impacts of a plan in relation to Habitats Regulations Assessment, it is necessary to understand the broad locations of proposed growth. This Development Strategy Update does not identify any new locations for growth. As such, no new evidence has been generated relevant to the Development Strategy Update that would have an impact on conclusions made by the Habitat Regulations Assessment reports that supported previous stages of plan making.

0.9 Full Sustainability Appraisal and Habitat Regulations Assessment reports will be completed to inform preparation of the draft Local Plan.

# Part 1A: Overarching development strategy

## 1 S/JH: New jobs and homes

### Issue the Plan is seeking to respond to

- 1.1 This section explains the approach taken to confirming objectively assessed needs set out in Policy S/JH: New jobs and homes, building on the explanation provided within the [Development Strategy Topic Paper published alongside the First Proposals \(Regulation 18: The Preferred Options\) Consultation 2021](#).

### Policy context update

- 1.2 There have been no changes to the National Planning Policy Framework and associated Planning Practice Guidance content relevant to identifying needs for jobs and homes that informed the 2021 First Proposals.
- 1.3 A [Ministerial Statement was issued by the Secretary of State for Levelling Up, Housing and Communities on 6 December 2022](#). This focuses on forthcoming changes to the planning system. It states that, 'I will retain a method for calculating local housing need figures, but consult on changes. I do believe that the plan-making process for housing has to start with a number. This number should, however, be an advisory starting point, a guide that is not mandatory.'

### Summary of issues arising from First Proposals responses

- 1.4 Issues raised in representations included:
- **Arguments to consider higher jobs/homes figures:** comments welcomed the decision to exceed the housing target derived from the national 'standard method' for calculating the number of new homes; other comments stressed the economic strengths of Greater Cambridge and, therefore, wanted the higher jobs forecast to apply and for this to influence a higher housing target.
  - **Arguments to adopt Standard Method minimum homes:** the need for growth was questioned by a range of consultees concerned over impacts on climate change, water supply, water quality, transport and healthcare infrastructure, quality of life and local character. N.B. A significant number of comments were attributed to Policy S/DS: Development strategy questioning planning for more than government's Standard Method minimum.
  - **Jobs forecasts challenges:** reasons given to justify use of a higher forecast included: higher predictions in the Cambridgeshire & Peterborough Independent Economic Review, higher growth trends,



housing affordability, the need to reduce commuting and to maintain the area's economic success.

- **Methodology challenges:** detailed technical evidence challenged the methodology for and approach to calculating jobs and homes targets.
- **Need to account for COVID-19 and other changes:** challenges associated with forecasting jobs and homes over the plan period relating to Brexit and the COVID-19 pandemic.
- **Planning for industrial space:** the need to assess and reflect recent growth trends in the logistics sector and demand for manufacturing space.

### New or updated evidence

- 1.5 The First Proposals made clear that we would update our evidence ahead of preparing the draft Local Plan, in particular to ensure we understood the potential longer-term impacts of COVID-19 for the objectively assessed need for jobs and homes. Following comments to the First Proposals regarding the plan period the Councils confirmed the plan period 2020-41 remains appropriate given the requirements to look ahead at least 15 years, balanced with the greater level of uncertainty associated with forecasting development needs over a longer period. This period has been used to inform the evidence base.
- 1.6 We commissioned the Greater Cambridge Economic Development, Employment Land and Housing Relationships 2022 report (EDELHR) to update our understanding of employment and housing needs. The EDELHR comprises a proportionate check of the published Employment Land and Economic Development Evidence Base 2020 (ELEDs) and the associated Housing and Employment Relationships Report 2020, drawing on up to date data and accounting for substantive representations on completed Local Plan consultations. Elements of the work comprise:
- A property market review and review of contextual economic evidence particularly reflecting latest information and impacts resulting from the COVID-19 pandemic.
  - Review of employment forecasting, drawing upon latest available data and completed in a way that is consistent with the approach taken in the published ELEDs, and assessing the employment floorspace implications for the Local Plan.
  - Review of the Housing and Employment Relationships Report 2020 (HERR), considering the employment implications of Government's Standard Method minimum Local Housing Need, and the housing implications of the employment forecasting referred to above.
- 1.7 Key findings from latest data include that:
- Whilst COVID-19 led to a fall in employment in population-related sectors such as construction, retail, food & accommodation and the arts & recreation, it is

notable that investment-led, knowledge intensive sectors such as life science and ICT have generally remained resilient or seen growth.

- The Census showed that Cambridge's population in 2021 in particular was 7,000 people higher than had previously been estimated by national or local sources. Accounting for this stronger than expected population growth influences a higher outlook for population-related sectors within the baseline future forecast for total employment.
- As per the ELEDs 2020, looking over a longer period (2011-20) and drawing on stakeholder engagement, key knowledge intensive sectors of health and care, ICT, professional services (including Research and Development, Head offices & management consultancies / Architectural & engineering services), and Other manufacturing & repair (relating to the manufacture of items supporting the life sciences sector) have seen exceptional rates of growth since 2011 and are expected to perform above the baseline forecasts. These sectors are expected in particular to drive economic performance in the Greater Cambridge economy.
- Stakeholders are broadly of the view that Greater Cambridge, notably life sciences, is in a fast growth cycle at present that will continue for a period but that a slow-down in the medium term can be expected. A key question is therefore the rate of return to a slower average. The alternative forecasts reported below reflect the uncertainty regarding this question.

#### 1.8 Drawing on these findings, the updated evidence identifies:

- an updated calculation of the government's Standard Method minimum homes and the jobs that this would support (we describe this later in the Topic paper as the 2022 minimum growth level);
- a 'central' most likely employment forecast - reflecting some continuation of exceptional rates of overall growth since 2011 (this continuation is longer than assumed in the ELEDs 2020 noting that as above, employment data published subsequent to that report shows a continuation of previously seen fast growth) before reverting gradually towards the longer term 2001-20 average, representing a longer term view allowing for future cycles and shocks - and the homes required to support this (we describe this later in the Topic paper as the 2022 medium growth level);
- a 'higher' less likely outcome - relying on the continuation of exceptional rates of overall growth since 2011 with a much more gradual slow down than in the central scenario - and the homes required to support these (we describe this later in the Topic paper as the 2022 maximum growth level).
- As for the ELEDs 2020, for the central and higher employment scenarios our consultants identified the homes required assuming Census 2011 commuting patterns (noting that full Census 2021 commuting data will not be available for some time, and that even when published it will reflect COVID-19 conditions which may not be reflective of longer term trends), and also completed a further

sensitivity test incorporating a 1:1 commuting assumption for all jobs above those supported by standard method minimum homes. For the central scenario, the forecast total jobs in 2041 is similar to the forecast at the same date in the 2020 report. However, the 2020 report (based on 2017 data) was based on an estimate of the anticipated 2020 jobs total, which proved to be lower than had been anticipated, noting that the pandemic led to reduced growth for 2020. With this 2020 data now available, the change in total jobs 2020-41 is greater to reach a similar 2041 outcome.

- 1.9 The table below sets out adopted Local Plan and Greater Cambridge Local Plan First Proposals jobs and homes figures, alongside 2022 growth level options for homes and jobs including varying commuting scenarios for relevant growth levels.

**Table 1: Previously identified and 2022 employment and housing growth levels**

<b>Growth scenario</b>	<b>Employment (jobs) 2020-41</b>	<b>Employment (jobs) per year</b>	<b>Housing (dwellings) 2020-41</b>	<b>Housing (dwellings) per year</b>
Local Plans 2018 (2011-31)	44,100	2,205	33,500	1,675
2021 Greater Cambridge Local Plan First Proposals	58,500	2,786	44,400 (rounded up)	2,111
2022 Standard Method based "minimum" growth level	43,300	2,062	37,149	1,769
2022 Central "medium" growth level (1-1 commuting scenario)	66,600	3,171	51,723	2,463
2022 Central "medium" growth level (2011 Census commuting)	66,600	3,171	47,964	2,284
2022 Higher "maximum" growth level (1-1 commuting scenario)	76,700	3,652	58,023	2,763
2022 Higher "maximum" growth level (2011 commuting)	76,700	3,652	53,109	2,529

## Draft policy approach, reasons and alternatives considered

### Draft policy approach

- 1.10 The proposed policy approach remains, as in the First Proposals, that the level of homes associated with the central ‘most likely’ employment scenario, described as medium growth level, is considered to represent the objectively assessed need for homes in Greater Cambridge, assuming that all the additional homes generated by forecast jobs above those supported by the Standard Method will be provided in full within Greater Cambridge (1-1 commuting scenario as above). However, the actual numbers should be updated to reflect the conclusions of the updated assessment contained in the Councils’ updated 2022 employment and housing evidence.
- 1.11 Our updated objectively assessed needs for development in the period 2020-41 are therefore:
- 66,600 jobs
  - 51,723 homes, reflecting an annual objectively assessed need of 2,463 homes

### Reasons for draft policy approach

- 1.12 As noted above, the EDELHR considered the 2022 central employment scenario (also described as medium growth level) to be the most likely outcome, allowing for future cycles and shocks.
- 1.13 Greater Cambridge’s economy hosts internationally significant clusters of Life Science, ICT and Professional Services and Advanced Manufacturing businesses, which continue to show strong growth despite the impacts of the pandemic, as evidenced by the EDELHR. In the context of national planning policy requirements for local plans to support economic growth and productivity, the 2022 medium level of jobs is considered to represent the objectively assessed need for jobs in Greater Cambridge for the plan period to 2041. This is consistent with the approach taken to identifying our objectively assessed needs for the First Proposals 2021 consultation.
- 1.14 The EDELHR also identified that the medium level jobs would generate a need for 51,800 homes (reflecting an annual objectively assessed need of 2,463 homes per year, which is rounded for the plan period), assuming all the additional homes to support the additional jobs (being those above the jobs supported by the standard method homes) are located in Greater Cambridge. This would have the effect of providing opportunities for workers in those additional jobs to live close to where they work, thereby mitigating against additional longer distance commuting beyond that assumed by Standard Method, therefore contributing to the aim of the Local Plan of ensuring that development is sited in places that help to limit carbon emissions. The total homes associated with the medium jobs are considered to represent the

objectively assessed need for homes in Greater Cambridge. The approach taken, in terms of identifying a housing need that meets the central most likely expected jobs growth, is a very significant step that would help limit further affordability pressures associated with housing delivery lagging behind employment, in contrast to the alternative of identifying our need to be the Standard Method housing figure. The housing need methodology includes specific adjustments in line with the Standard Method approach to address any previous suppression of household formation, thereby further addressing affordability challenges.

- 1.15 The EDELHR Report also demonstrated that if existing commuting patterns were carried forward, the homes that would be provided in Greater Cambridge would be 48,000. However, this approach would not contribute to the Local Plan aim of ensuring that development is sited in places that help to limit carbon emissions. In addition, there is no certainty that neighbouring authorities would plan for the additional homes in their local plans in order to support the economy in Greater Cambridge. The approach to employment land and housing provision to meet the objectively assessed needs is considered under S/DS: Development Strategy.

### **Additional alternative approaches considered**

#### 2022 maximum level of homes, associated with higher employment scenario

- 1.16 As noted above, the EDELHR stated that the higher employment scenario is 'a less likely outcome as it overly relies on the continuation of recent high rates of overall growth'. As such, the 2022 maximum level of homes, associated with the higher employment scenario, is not considered to represent the objectively assessed need for homes in Greater Cambridge, and would therefore not be a reasonable alternative.

#### 2022 Standard Method minimum homes and related jobs

- 1.17 The EDELHR 2022 found that planning for the standard method housing figure set by government would not support the number of jobs expected to arise between 2020 and 2041. It would also be a substantially lower annual level of jobs provision than has been created over recent years. Planning for this housing figure would risk increasing the amount of longer distance commuting into Greater Cambridge, with the resulting impacts on climate change and congestion.
- 1.18 As such, 2022 Standard Method local housing need and the related number of jobs that that would support, are not considered to represent the objectively assessed need for homes and jobs in Greater Cambridge, and would therefore not be a reasonable alternative.

## Response to issues raised in representations

1.19 Responses to issues raised in representations include:

- **Arguments to consider higher jobs/homes figures:** The EDELHR takes a robust approach to calculating the most likely employment outcome, allowing for future cycles and shocks. The EDELHR stated that the higher employment scenario is ‘a less likely outcome as it overly relies on the continuation of recent high rates of overall growth’. As such, the 2022 maximum level of homes, associated with the higher employment scenario, is not considered to represent the objectively assessed need for homes in Greater Cambridge, and would therefore not be a reasonable alternative.
- **Arguments to adopt Standard Method minimum homes:** Regarding comments questioning why we should plan for more than government’s Standard Method minimum, the EDELHR found that planning for the Standard Method housing figure set by government would not support the number of jobs expected to arise between 2020 and 2041. It would also be a substantially lower annual level of jobs provision than has been created over recent years. Planning for this housing figure would risk increasing further the amount of longer distance commuting into Greater Cambridge, with the resulting impacts on climate change and congestion. As such, 2022 Standard Method local housing need and the related number of jobs that that would support, are not considered to represent the objectively assessed need for homes and jobs in Greater Cambridge, and would therefore not be a reasonable alternative. Responses to comments regarding the negative implications of growth are relevant to provision of homes and employment floorspace in response to identified needs. As such they are addressed in Policy S/DS: Development strategy.
- **Methodology and jobs forecasts challenges:** The EDELHR takes a robust approach to identifying the most likely jobs forecast, drawing upon latest available data in a way that is consistent with the approach taken in the published ELEDs. The approach to identifying the housing that would be needed to support this incorporates an assumption of providing opportunities for workers in those additional jobs to live close to where they work, thereby mitigating against additional longer distance commuting beyond that assumed by Standard Method. This approach would also help limit further affordability pressures associated with housing delivery lagging behind employment, in contrast to the alternative of identifying our need to be the Standard Method housing figure.
- **Need to account for COVID-19 and other changes:** The EDELHR approach takes account of latest jobs growth data, COVID-19 and home working trends and Census 2021 data and interviews with stakeholders.

- **Planning for industrial space:** The EDELHR considers updated property market data, supply trends and market signals as part of its recommended approach to identifying industrial/warehousing sector needs.

### **Further work and next steps**

- 1.20 Ahead of the draft plan we will explore the evidence of needs for other elements of policy S/JH: New jobs and homes, including:
- Accommodation needs for pitches, plots, moorings and other forms of specialist housing
  - Neighbourhood plan housing targets
- 1.21 We will consider the need to update our evidence regarding jobs and homes needs further at later stages of plan-making.



## 2 S/DS: Development strategy

### Issue the Plan is seeking to respond to

- 2.1 Having regard to the objectively assessed needs for homes and jobs identified in the previous section, this section explains the approach taken to:
- Confirming employment provision and housing targets for the plan so far as we are able at this point, including exploring the environmental, social and economic impacts of meeting the identified objectively assessed needs. Any issues arising from the Duty to Cooperate are also taken into account.
  - Confirming the distribution of development so far as we are able at this point.

### Policy context update

- 2.2 There have been no substantive changes to the National Planning Policy Framework and associated Planning Practice Guidance content relevant to determining a development strategy, that informed the 2021 First Proposals.
- 2.3 As for the First Proposals, the overarching policy requirement is set out at [National Planning Policy Framework paragraph 35b](#), which states that plans are sound if they are “Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”. The discussion below includes consideration of reasonable alternatives and evidence findings informing the process being followed to arrive at “an appropriate strategy”.
- 2.4 A Ministerial Statement was issued by the Secretary of State for Levelling Up, Housing and Communities on 6 December 2022. This focuses on forthcoming changes to the planning system. It states that, ‘It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character or an area, or heritage assets. It will also be up to them to increase the proportion of affordable housing if they wish.’

### Summary of issues arising from First Proposals responses

- 2.5 Issues raised in representations included:
- **Arguments for more development:** proposals for more employment and housing, in order to support economic growth, reduce in-commuting, deliver more affordable housing, and to provide a more flexible supply of homes.
  - **Arguments for less development:** comments seeking less development noted: the circular nature of planning for more and more growth, climate and nature impacts, harm to quality of life and the character of the area, that development

will compound affordable housing challenges and existing inequality, or that the proposal is higher than government's standard minimum housing need.

- **Providing flexibility:** requests to build flexibility into housing and employment land supply.
- **Housing delivery challenges:** comments seeking further evidence to support the Councils' assumptions on lead-in times and build out rates for strategic sites and in particular the site specific housing trajectories for North East Cambridge, Cambridge East, North West Cambridge, Northstowe, Waterbeach New Town, Cambourne, and Bourn Airfield New Village. Requests for the windfall allowance to be reconsidered, as developers/promoters highlight that future supply from windfall sites is unlikely to match historic delivery.
- **Need for supporting infrastructure:** recognition that the higher growth level option will require infrastructure funding, including for transport, water and electricity infrastructure.
- **Need to consider water supply:** Environment Agency and Natural England stated concern whether the growth proposed can be sustainable without causing further deterioration to the water environment. Expressed intention, with Cambridge Water and Anglian Water, to work collaboratively with the Councils to explore the issue further.
- **Need to account for COVID-19:** comments suggested reconsidering the strategy in light of COVID-19.
- **Overarching development strategy challenges:** wide ranging in-principle support for climate focused development strategy. Conversely, ~100 individuals supported the Friends of the River Cam letter objecting to the plan on the grounds of inadequate water supply, effect on national food supply, failure to minimise climate change, likely irreparable damage to ecosystems, carbon emissions from construction, lack of integrated public transport, undermining the Levelling Up agenda, democratic deficit in process and evidence base.
- **Scale of development challenges:** Landowners/developers argued that that the strategy relied too much on large urban extensions to Cambridge City and new settlements in South Cambridgeshire, and proposed that the plan should include a greater number of smaller sites, particularly at villages; concern about the accelerated delivery rates assumed at strategic sites.
- **Need to consider transport and other infrastructure provision, including East West Rail:** Limited concern at reliance on East West Rail and/or objection to East West Rail project. Limited concern whether transport and other infrastructure would cope with the pressure generated by the development proposed in the plan.
- **Spatial directions/broad locations challenges:** Limited comments proposed more development in Rural Southern Cluster to rebalance distribution. Limited support and objection to densification of Cambridge urban area as a broad location; for Edge of Cambridge – Green Belt: support for specific releases;

affected parish councils urged greater separation. For the Rural area, individuals and parish councils supported the limits on rural development proposed in the plan.

## **New or updated evidence**

### **Employment and housing provision**

#### In principle approach to employment provision

- 2.6 Having regard to the objectively assessed needs for homes and jobs identified in the section above, this section explains the EDELHR's recommendations regarding planning for employment land to support economic growth.
- 2.7 To identify the forecast need/requirement for office, Research and Development (R&D) and industrial/warehouse floorspace up to 2041, the EDELHR draws on:
- 2.8 The labour demand (amount of employment employers will seek to hire) and labour supply (number of people seeking work) model forecasts,
- recent trends in the amount of floorspace completed and available for occupation (completions), and
  - market signals.
- 2.9 Within these forecasts margins are added to provide a flexible supply and choice of sites, and a percentage allowance to reflect the expectation that a level of vacancy is necessary in stock to allow for choice and churn.
- 2.10 The identified floorspace requirements are as follows:
- For offices all labour demand and supply models result in higher needs than identified in the 2020 ELEDs largely due to positive changes in the outlook for the professional services sector and improved integration with market signals. Taking these market signals into account, and planning positively for growth, a future need of 289,700 square metres (sqm) of office floorspace is considered appropriate. For R&D premises, the completions trend sits above the central and high labour models, however the completions are heavily influenced by a single development. A centred position of planning for a need of around 600,000 sqm of R&D floorspace is considered to be appropriate. This figure balances a range of factors including the need to provide a good choice of sites.
  - For industrial and warehouse needs the labour demand scenarios report a circa 40-60,000 sqm floorspace requirement. It is considered appropriate to factor in some replacement of losses in the future to reduce market pressure. Between 25% and 50% of past losses are recommended for

replacement, after considering market signals, which results in a preferred need of around 200,000 sqm.

- 2.11 The EDELHR report notes that, given the identified committed future supply and with the proposed additional supply at North East Cambridge, Cambridge East and West Cambridge, emerging Local Plan allocations are likely to be able to fulfil the shortfall in office and R&D needs. However, it suggests that the industrial and warehousing space may need further provision which should include a combination of traditional industrial units with wholesaling / servicing, manufacturing, mid-tech units and more warehouse and distribution focused units.
- 2.12 In principle we consider that we should plan positively to provide new land for the identified undersupply in particular types of employment, unless evidence identifies an insurmountable problem with achieving that in a sustainable way. This would reflect the NPPF's requirement at paragraph 81 that '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'. This positive approach would ensure a flexible supply over the plan period and beyond, recognising the particular needs of the Greater Cambridge economy.
- 2.13 We will continue to review anticipated supply from existing commitments and potential allocations as we move towards the draft plan stage.

#### [In principle approach to housing provision](#)

- 2.14 As with employment, the Councils' intention is also to meet the objectively assessed needs for housing identified within Greater Cambridge over the plan period, unless evidence identifies an insurmountable problem with achieving that in a sustainable way that takes account of infrastructure capacity and can be demonstrated to be capable of being delivered.
- 2.15 We have not prepared an updated housing trajectory of anticipated supply from existing commitments for this Development Strategy Update due to it being an interim stage in the plan making process. However, having compared the [Greater Cambridge Housing Trajectory \(1 April 2022\)](#) and the housing trajectory included within First Proposals, we consider that if we were to have updated the housing trajectory to calculate the current amount of committed supply it would show a similar number of dwellings to that set out in the First Proposals. Using the committed supply position set out in the First Proposals of 37,200 dwellings, under the 2022 medium growth level the balance to find for the period 2020-41 would be around 14,600 homes excluding a 10% buffer (19,800 homes including a 10% buffer). This compares to First Proposals 2021 figures of 7,200 excluding a 10% buffer (11,640 including a 10% buffer). This means that if all the sites and delivery assumptions

identified in the First Proposals were included in the draft plan, additional sites to deliver around a further 7,400 homes excluding a 10% buffer (8,160 homes including a 10% buffer) would need to be identified to be delivered in the plan period to 2041, in order to meet the 2022 medium growth level.

- 2.16 As part of preparing the draft Local Plan, we will update the housing trajectory to show up to date information on anticipated supply from existing commitments and new allocations, which we will use to demonstrate how we will meet our housing requirement once that has been settled having regards to other factors highlighted in this topic paper. The housing trajectory will be prepared, where possible, following engagement with developers/promoters on the sites included within it, so that we understand their aspirations in terms of the delivery strategies and timetables for their sites. We also have recommendations from the [Housing Delivery Study for Greater Cambridge](#) (2021) on build out rates and lead in times for sites, that we can use for any sites where we are unable to engage with the developer/promoter or which can act as a 'sense check' when considering developers/promoters assumptions. The Housing Delivery Study (2021) also provides evidence to justify the continued delivery of windfall sites in Cambridge and South Cambridgeshire, and recommends a windfall allowance for use by the Councils.
- 2.17 We received representations on the First Proposals that related to the recommendations included in the Housing Delivery Study for Greater Cambridge (2021) and earlier [Interim Findings](#) (2020), and also how they had been used by the Councils in developing the housing trajectory included within First Proposals. The Councils therefore commissioned AECOM to review the representations made related to housing delivery, specifically windfalls, lead-in times and build out rates.
- 2.18 The Housing Delivery Study for Greater Cambridge – Addendum (2022) sets out AECOM's recommendations for responding to the representations relating to housing delivery. The following paragraphs provide a response to the issues raised in the representations, taking account of AECOM's recommendations, and set out why the Councils consider that it is appropriate to continue to use the recommendations on windfalls, lead-in times and build out rates from the Housing Delivery Study (2021) in preparing the housing trajectory for inclusion in the Local Plan.

#### Lead-in times and build out rates

- 2.19 The Housing Delivery Study (2021) and earlier Interim Findings (2020) provide a detailed analysis of housing delivery in Greater Cambridge, along with tables of data comparing build out rates and lead in times for strategic scale developments across the OxCam Arc and to Lichfield's Start to Finish report recommendations, and a

literature review of published housing delivery information including from Inspectors' Reports and other research reports.

- 2.20 From their research, AECOM within the Housing Delivery Study (2021) recommend to the Councils a series of assumptions for lead-in times and build out rates for strategic and non-strategic sites, and depending on the location and / or anticipated housing mix for the site. For strategic sites, the recommendation is that the lead-in time from allocation to first completions is 8-9 years where some form of supplementary guidance is required such as a masterplan, design guide/code or Supplementary Planning Document (SPD), but that if this guidance was incorporated into the Local Plan allocation then this could shorten the lead-in time by 2-3 years. AECOM also allow for variations from its recommendations where there is site specific evidence to support a different approach. For new settlements, the recommendations are that a peak of 300 dwellings a year is achievable, where there is number of different housebuilders each with their own sales outlets, and following a gradual build up over several years and before there is a gradual decrease at the end of the build out of the development. The Housing Delivery Study (2021) highlighted Modern Methods of Construction as a way of increasing housing delivery, but the recommended build out rates are based on sites providing a variety of products through a number of sales outlets, and are not solely based on homes being delivered by this one method.
- 2.21 Although, 300 dwellings a year is higher than the 250 dwellings a year the Councils have previously assumed for new settlements and strategic sites on the edge of Cambridge, the Councils have evidence from developers that they are anticipating this higher level of annual completions. In collecting data for the annual update to the Greater Cambridge Housing Trajectory, officers have received information from Homes England that annual completions of 250-300 dwellings a year are anticipated for Phase 2 at Northstowe and similarly for Phase 3 at Northstowe, and from David Lock Associates (on behalf of Urban & Civic) that annual completions of 250 dwellings a year are anticipated for Waterbeach New Town (WNT) West, with similar rates anticipated for WNT East from Boyer Planning (on behalf of RLW Estates).
- 2.22 In preparing the housing trajectories for each of the existing strategic sites as part of the annual update to the Greater Cambridge housing trajectory, the Councils take into account the anticipated delivery of specific transport infrastructure required through planning conditions to be in place before occupations reach specific levels. The lead-in times for each of the new strategic sites included in the First Proposals are based on the recommendations from the Housing Delivery Study (2021), but taking account of site specific information including the likely delivery of specific infrastructure or the relocation of existing uses.

2.23 Considering the delivery timetables across the whole of their build out for each of the strategic sites on the edge of Cambridge and at new settlements, the Councils' assumptions as included in the First Proposals housing trajectory are consistent with the recommendations set out in the Housing Delivery Study (2021) in terms of build out rates and lead in times. The housing trajectories for all the strategic sites assume a gradual build up, followed by a number of years delivering peak housing completions, before gradually slowing down towards the end of the build. The only instances of housing completions over the peak annual housing completions recommended are in the earlier years on existing sites where the Councils have information on actual completions. The average build out rates across the whole of the delivery timetable for the majority of these strategic sites are lower than or within the recommended range set out in the Housing Delivery Study (2021). The average build out rates across the whole of the delivery timetable for Northstowe and Waterbeach New Town are slightly higher than the range recommended in the Housing Delivery Study for Greater Cambridge (2021), but still lower than the peak build out rate. The Housing Delivery Study – Addendum (2022) confirms that this is a reflection of the scale of these new towns of 10,000+ dwellings, compared with the more modest examples used in the study, and that the lifetime average of a scheme of 10,000+ homes will inevitably be higher than for a more modest strategic development.

2.24 Having considered the issues raised in the representations on the First Proposals, AECOM in the Housing Delivery Study – Addendum (2022) have confirmed that the recommendations in the Housing Delivery Study (2021) for lead-in times and build out rates are realistic and reliable for use in plan-making in the Greater Cambridge area.

### Windfalls

2.25 In calculating anticipated housing completions from windfall sites within the plan period, the Councils have considered whether there is compelling evidence that windfall sites will continue to be a reliable source of housing supply, as required by the NPPF (2021). The Housing Delivery Study (2021) considers historic delivery from windfall sites within Greater Cambridge, and provides recommendations in terms of levels of future anticipated housing supply from windfall sites. The Housing Delivery Study – Addendum (2022) continues to provide justification that windfall sites will continue to be a reliable source of supply.

2.26 The Councils will review the definition of a windfall site included in the glossary of the plan as part of the preparation of the draft Local Plan. However, the NPPF 2021 defines windfall sites as “sites not specifically identified in the development plan”, and this was the definition used to identify completed dwellings on windfall sites when considering historic delivery. Therefore, dwellings completed on sites not

allocated within the development plan that were greenfield, previously developed land or garden land, were all included in the calculations as set out in the Housing Delivery Study (2021) and this is clarified in the Housing Delivery Study – Addendum (2022). Within South Cambridgeshire, the Council had historically excluded, from their calculations of historic delivery, dwellings completed on specific windfall sites that were permitted as a departure to the development plan while the Council was unable to demonstrate a five year supply, due to these sites not being a trend that will continue into the future. AECOM in the Housing Delivery Study (2021) continue to recommend this as the correct approach, with the historic delivery figures in Table 4 excluding any dwellings completed on these ‘five year supply’ sites. This is also confirmed in the Housing Delivery Study – Addendum (2022).

2.27 The Councils’ planning policies for windfall housing developments within both Cambridge and South Cambridgeshire, which restrict housing development to within the defined boundaries of each of their settlements and to particular types of housing development within the countryside, have been in existence now for over 15 years, and there has been a continued supply of windfall sites for housing brought forward and completed during this time. There will always be new opportunities to redevelop sites within settlements, and this is supplemented by permitted development rights that now enable a greater number of new homes to be delivered both within the countryside through the change of use of agricultural buildings or within settlements through the change of use of non-residential buildings. The Councils are proposing to retain their planning policies for windfall housing developments largely unchanged in the Greater Cambridge Local Plan, and therefore a supply of windfall sites will continue to come forward within the plan period.

2.28 The Councils’ adopted Local Plans both include planning policies for resisting inappropriate development in gardens, and this is consistent with the NPPF (2021). These policies do not prevent new homes being permitted on garden land, but ensure that specific issues have been addressed before any development proposal is permitted. The NPPF (2021) no longer specifically requires dwellings completed on garden land to be excluded from any calculations of delivery from windfall sites. Dwellings completed on garden land will therefore continue to come forward, even with the Councils proposing to retain the policy approach to resist inappropriate development in gardens in the Greater Cambridge Local Plan. The Housing Delivery Study for Greater Cambridge (2021) justifies this approach of considering housing completions on garden land within the calculations of historic delivery from windfall sites.

2.29 The Councils approach to considering housing delivery from windfall sites is robust, and takes account of historic delivery and future supply as required by the NPPF (2021). Within the housing trajectory in the First Proposals, windfall sites with planning permission account for 12% of anticipated housing supply, the windfall



allowance accounts for 11% of anticipated housing supply, and allocations account for 77% of anticipated housing supply.

- 2.30 Having considered the issues raised in the representations on the First Proposals, AECOM in the Housing Delivery Study – Addendum (2022) have confirmed that the recommendations in the Housing Delivery Study (2021) for windfalls are realistic and reliable for use in plan-making in the Greater Cambridge area.

#### Duty to Cooperate

- 2.31 We confirm that to date we have received no requests from other authorities to take any of their development needs. At present we are not asking other authorities to take our own objectively assessed needs, however, see the section below under Further work and next steps. We note the comment from East Cambridgeshire District Council responding to the First Proposals consultation, noting that they “may have concerns if, over the coming years, new homes considerably exceeded job growth, or job growth considerably exceeded new homes. Under such scenarios, there could be ‘spill over’ effects on East Cambridgeshire, hence the need for the plan to have mechanisms in place to actively ‘plan, monitor and manage’ for these potential eventualities”. Our approach seeks to manage this risk in identifying needs that provide enough homes to support forecast jobs, however infrastructure and delivery constraints may impact the number of homes and jobs that may be appropriate to plan for and this issue will need to be kept under review as the draft plan is prepared.

#### Testing of impacts of planning for 2022 growth levels

- 2.32 To explore the environmental, economic and social implications of the updated 2022 growth levels, including the objectively assessed need level, we asked our evidence base consultants to consider the new 2022 minimum, medium and maximum growth levels - being the jobs and homes outputs derived from the Standard Method, ‘central’ and ‘higher’ scenarios respectively as referred to above - in relation to their previous conclusions regarding strategic growth and spatial options assessments in 2020 and 2021. Full analysis of the figures and consultants’ comments are set out in Appendix Jan23-A: Evidence base assessments of 2022 growth levels.
- 2.33 In terms of the scale of the 2022 medium growth level in particular (noting that we consider this to be our objectively assessed need), this is 7,400 homes higher than the 2021 objectively assessed need for the period 2020-41 (also referred to as medium+; see Appendix Jan23-A for more details). A summary of the implications is provided below:

## Implications across all evidence bases

2.34 Evidence bases considered that the difference between the 2022 minimum and the 2020 minimum was not material; most evidence bases with the exception of infrastructure considered that the difference between the 2020 maximum and 2022 maximum was not material. Drawing on the above, headline implications of the 2022 medium growth level (which we consider represent our objectively assessed needs) for each evidence base are set out below.

2.35 Noting the significant increase presented by the 2022 medium in relation to the 2020 and 2021 medium figures, all evidence bases stated that the location of that additional growth would have a material bearing on its impacts.

### 2.36 Environmental implications

- Water: increase development would be likely to present further challenges in how a water supply-demand balance is met without detriment to the water environment. Without knowledge of how Cambridge Water propose to achieve a supply-demand balance it is not possible at this time to indicate whether the 2022 medium proposal is sustainable from a water resources perspective See more on this topic in the following section.
- Net zero: increased growth would cause an overall increase in the amount of carbon shown in the modelling, but note that artificially limiting growth within Greater Cambridge could squeeze that growth into neighbouring areas and simply 'hide' that carbon rather than avoiding it.
- Green infrastructure: increased growth would exacerbate the effects identified in the previous assessments (including pressure on the existing GI network; but conversely opportunities for enhancement of existing areas or provision of new areas. Higher growth options reduce flexibility in being able to target the location of development to minimise impacts on existing assets, or to focus development to where the greatest opportunities can be achieved, and will result in greater land take).
- Landscape: increased growth would be likely to result in changes that may cause greater harm to distinctive local landscape and townscape characteristics/features, depending on the spatial option.
- Heritage Impact Assessment: in terms of the historic environment, the additional growth will most probably increase the risk of significant conflict with policy.

### 2.37 Economic implications

- Employment: Given the rate of job creation in the past, the 2022 employment evidence recognises this as the most likely outcome for the Greater Cambridge economy. The current level of floorspace commitments in the Greater Cambridge

land supply and First Proposals allocations would provide enough offices and laboratories employment land to meet the needs generated under the central scenario, however there is uncertainty regarding industrial and warehousing needs

### 2.38 Social implications

- Housing delivery: The material increase in annual housing completions from the 2020 medium and 2021 medium+ to the 2022 medium will require significant new sources of supply over and above the additional allocations proposed in the First Proposals. Therefore additional testing of spatial options (baskets of sites) is required to estimate at what level the housing requirement becomes unachievable. See more on this topic in the following section.
- Transport: no significant impact on the ability of the transport network to accommodate the increased growth, but there may need to be additional mitigation both across the local plan area and on a site-by-site basis.
- Infrastructure: the medium and maximum growth options will result in generate significant infrastructure needs over and above the maximum needs we estimated in earlier studies, irrespective of spatial options (the location of growth).

#### Ensuring a deliverable plan: Water supply

2.39 In consulting on the First Proposals, the Councils were clear that the preferred options set out for the plan were contingent on there being evidence of an adequate supply of water without unacceptable environmental harm. We were awaiting the publication of the draft Regional Water Resources Plan and also Cambridge Water's draft Water Resource Management Plan (WRMP) anticipated in autumn 2022 to provide further information on available supply during the plan period.

2.40 The [Draft Regional Water Resources Plan](#) was published by Water Resources East in November 2022. The plan is clear that "Unless urgent action is taken by all sectors, the region will face severe water shortages. This will constrain agricultural production and curtail economic growth, impacting the region's prosperity and endangering the east's iconic chalk rivers, peatlands and wetlands."

2.41 The main proposals set out in the draft Regional Plan for Cambridge Water's area (which covers the area of Greater Cambridge and a small part of Huntingdonshire District Council's area) are set in the context of considerable reduction in abstraction licenses by the Environment Agency in two stages; first to prevent further deterioration; and then to move towards an 'environmental destination' where the water environment would potentially be restored, focusing first on protected sites. These reductions will require further demand management and considerable new supply side capacity.

- 2.42 The Regional Plan says that additional supply is proposed in the form of a medium term water transfer from Anglian Water's area expected to be operating from around 2030 (or potentially earlier) and in the longer term from the proposed Fens Reservoir expected to be operating from around 2035-37, which has started its process but has not yet progressed to the planning permission stage.
- 2.43 Further detail on the quantum of water supply and how that relates to housing and non-domestic growth will be provided in the Water Company WRMPs. These were due to be published in draft around the same time as the draft Regional Plan but have been delayed. Until such time as they are published and we are able to analyse the detailed proposals it is not clear how water supply will compare with current commitments, the First Proposals growth levels, or the new increased needs for jobs and homes.
- 2.44 We understand that Cambridge Water are working hard to explore how they meet the needs of existing and committed development and also emerging proposals for further growth in our First Proposals, and how they can do this in response to the licence reductions identified by the Environment Agency to protect the water environment. The Regional Plan advises that it is possible that water companies could look to seek a delay to licence cap reductions until later in the 2030s due to an overriding public interest case in providing secure water supplies. This is allowable under Regulation 19 of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. However, at this point it is not clear whether Cambridge Water will need to go down the route of seeking such a delay in reduction of abstraction, and if even if they did, whether it would be successful.
- 2.45 The local plan making process is a separate process under its own legislation. It will be for the Councils as plan makers to take a view, based on evidence, of the appropriate development strategy including considering all aspects of sustainable development. The Councils' position to date has been that they would seek to meet the identified objectively assessed needs in full in Greater Cambridge but only contingent upon there being no unacceptable harm to the environment. It will be for the Councils to determine how that is defined.
- 2.46 Only once Cambridge Water's draft Water Resource Management Plan is published, and we understand their proposals and water supply available at different stages during the plan period to 2041, will we be in a position to confidently know whether there is potential for there to be sufficient water supply available to meet our increased needs for homes and jobs. If this proves not to be the case, we will need to consider the economic and social impacts as well as the environmental impacts, before the Councils reach an informed judgement of the appropriate housing and jobs targets for the Local Plan. This will include retesting and reconfirming as

appropriate our stance at First Proposals that development levels should not cause any unacceptable environmental harm. Reduced development targets may be necessary to ensure no unacceptable environmental harm to the chalk aquifer and chalk streams. There may be social and equalities impacts of not meeting our housing needs in full such as potentially increasing affordability issues and less affordable housing being provided in the area and climate impacts arising from more longer distance commuting.

2.47 However, what we do understand already is that once the reservoir is operational from around the mid-2030s there will be a significant increase in water supply available which is not reliant on ground water abstraction. The process for bringing forward the new Fens Reservoir is already progressing and given the significance of the proposal to the future water security of the Region, there is considered to be a reasonable prospect that it will be delivered and therefore we can be confident that whatever decision is made for the plan period as a whole, we will be able to plan for further development being completed from the opening of the reservoir in 2035-37. It is the interim period that remains uncertain at this point, although it is expected that the proposed water transfer from Anglian Water will increase supply from around 2030 or possibly earlier.

2.48 It is also clear from this narrative that investment in strategic infrastructure to address water supplies, to enable improvement of the water environment and to support meeting development needs, is a key issue for Greater Cambridge. It is hoped that there may still be further opportunities to speed up delivery of this infrastructure. The Councils will be responding to the water plan consultations and have the opportunity to raise these issues.

#### Ensuring a deliverable plan: Housing delivery

2.49 In the context of an increased need for jobs and homes and the consequential increase in the annual average delivery rate needed to meet those needs during the plan period, it becomes important to understand the maximum annual housing delivery rates that are considered reasonable to rely on. This is particularly relevant in the context that there could be pressure for even higher delivery rates over the later stages of the plan period once the reservoir is open to help make up any shortfall earlier in the plan period. Given the uplift in average annual housing delivery rates necessary to meet our identified needs in full, it is also important to recognise that this significantly exceeds the average annual rates assumed for the current 2018 Local Plans, but that it will not be possible for any new sites included in the new Local Plan to come forward to add to those rates until the new plan is adopted.

2.50 Given this changing context, further work has been commissioned to supplement our existing housing delivery evidence. The Housing Delivery Study (2021) identified that

the objectively assessed need included in the First Proposals (referred to when being assessed as the medium+ growth level) was considered to be deliverable. The assessment of the higher 2022 medium growth level (in the Housing Delivery Study – Addendum (2022)) concludes that this would be a material increase in annual housing completions from the 2020 medium and 2021 medium+ growth levels, which will require significant new sources of supply over and above the additional allocations proposed in the First Proposals. It also sets out that at this stage it is hard to quantify the tipping point at which delivery in excess of the 2021 medium+ scenario becomes unachievable as this would require a more detailed analysis of the sites likely to form part of the spatial strategy. Therefore, it concludes that additional testing of spatial options (baskets of sites) is required to estimate at what level the housing requirement becomes unachievable. They reach this conclusion drawing on their previous recommendations and conclusions from the Housing Delivery Study for Greater Cambridge (2021) and Interim Findings (2020) that consider issues such as the local housing market and market absorption rates, construction industry capacity, experience elsewhere in the country, and different forms of delivery models.

2.51 The Housing Delivery Study – Addendum (2022) also advises that a stepped housing requirement would be needed. This would address a number of considerations. First it would reflect the uplift in the average annual delivery rate required by the increased housing need and to acknowledge that it is not reasonable to expect that those higher annual rates can be achieved until the new plan is adopted and additional allocated sites, where they are not consistent with the 2018 Local Plans, can receive planning permission and start to deliver new homes. This has the effect of increasing the annual figure for the years remaining once the plan has been adopted. Second it could take account of timing of new water infrastructure becoming available and the opportunity that provides for increasing housing delivery at those points in the plan period, if that proves to be necessary.

2.52 The assessment (in the Housing Delivery Study – Addendum (2022)) also highlights that:

- A diverse housing supply that is flexible to changing circumstances and less reliant on a smaller more concentrated basket of sites would be required to maximise market absorption,
- A housing land supply that is more geographically spread would help to reduce competition, thus better-matching the housing supply with demand, but that this brings its own challenges in terms of infrastructure delivery and could result in a less sustainable spatial strategy,
- A 10% buffer would still be required to provide flexibility over the plan period should sites not progress as intended, and
- Such an unprecedented growth level (with such high levels of annual completions) may be possible if the Councils were able to pursue more

interventionist routes to delivery as this could help the Councils to diversify their housing land supply and lessen reliance on traditional private sector models of housebuilding. However, this will naturally have a limit in terms of additional supply over and above what can be delivered by the private sector alone, and macro-economic challenges and any contraction in funding from Government will continue to impact all development in the short to medium term.

### Sustainability Appraisal implications

- 2.53 A Sustainability Appraisal Addendum has been prepared that provides a sustainability commentary on potential alternative options for responding to the new increased level of need for jobs and homes: to either meet the new higher needs in full, or to only provide a proportion of the new needs due to water supply and associated environmental constraints and housing deliverability constraints, particularly in the short to medium term. It recognises there is currently too much uncertainty to say which might be reasonable options but provides a short commentary on the likely direction of economic, social and environmental effects of the two emerging options, compared with the assessment of the preferred option contained in the First Proposals which met the earlier identified level of need.
- 2.54 An option that met need for jobs and homes in full would generate similar positive effects in terms of housing and employment to the First Proposals, and meeting demand would help with aspects including housing affordability and social inclusion. However, providing more development to meet the higher needs would increase likely negative effects on aspects including climate change and air, noise and light pollution, biodiversity, landscape, townscape and historic environment. The greater the extent and scale of growth the greater the potential for negative impacts on the natural and historic environment at both the local and landscape scale. There are proposals to provide additional water supply but there remains uncertainty at this stage on the potential sustainability effects of this. If a spatial strategy for meeting increased needs maintained good access to services and facilities then impacts would remain similar to the First Proposals, but if housing delivery challenges led to a strategy with more smaller sites spread around villages that would have likely negative impacts on access to services and facilities.
- 2.55 Alternatively, an option that did not fully meet growth needs would have more limited impacts on the natural and built environment and help avoid unacceptable environmental harm to the chalk aquifer and chalk streams in Greater Cambridge. However, if fewer homes and jobs were provided in Greater Cambridge, people would likely have to travel greater distances to commute to and from workplaces and access local services and facilities, resulting in more negative effects on access to services and facilities, climate change and air pollution. The impacts would be exacerbated if jobs continue to grow given the strength of the economy and land

supply, whilst new housing was limited. Impacts may be reduced but not eliminated if neighbours were willing and able to accommodate some or all of a shortfall in Greater Cambridge.

### **Distribution of development**

- 2.56 We have not completed new or updated evidence in relation to the distribution of development beyond the evidence completed to support the First Proposals.
- 2.57 Government's [Autumn Statement 2022](#) recommitted government's support for East West Rail, which includes a proposed rail line between Bedford and Cambridge, including a station at Cambourne.

### **Draft policy approach, reasons and alternatives considered**

#### **Draft policy approach**

- 2.58 In principle the Councils' position remains that the Greater Cambridge Local Plan should seek to provide for the identified objectively assessed needs for housing and jobs. However, the councils are very clear that this must be considered in the context of whether, or how much of, that need can be provided without unacceptable sustainability impacts. This includes understanding the water supply position and potential to cause unacceptable environmental harm. This will be weighed against the social and economic impacts of not meeting our objectively assessed needs for homes and potentially also jobs in full, including the social, environmental and economic impacts such as worsening housing affordability and climate impacts from increasing numbers of people travelling to work in Greater Cambridge from outside the area. Consideration will be given to consider the spatial distribution of additional growth both in terms of whether it provides a development strategy that is capable of being delivered by the market or by more interventionist means, and also whether it would provide a strategy that delivers sustainable development, including how it may impact on the character of the area.
- 2.59 The Policy direction in the First Proposals said "The proposed development strategy is to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way. It also seeks to be realistic around the locational limits of some new jobs floorspace which is centred upon national and global economic clusters".
- 2.60 Having reviewed First Proposals representations and our evidence we confirm that the above development strategy principles that informed the First Proposals



development strategy remain valid, and we would build on these to inform the identification of any additional sites that may be necessary to meet, or go towards meeting, the 2022 housing and employment targets. As such we would expect to reach a view on the sites included in the First Proposals as a first step.

## **Reasons for draft policy approach**

### Employment and housing provision

- 2.61 The in principle position of seeking to meet objectively assessed needs responds to national planning policy which requires us to provide for our identified objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In particular this would respond to national policy requirements that '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'.
- 2.62 In the context of water supply and housing delivery considered above, it is currently anticipated that either or both these factors could mean that it may not be possible to meet the new objectively assessed housing need in full.
- 2.63 In addition, once the water supply position is understood, the Councils will need to revisit the view taken at the First Proposal stage that development levels set as targets for the Local Plan should not cause unacceptable environmental harm, taking account of available water supply during the plan period to 2041, weighed against the social and economic impacts of not meeting our objectively assessed needs for homes and potentially also jobs in full.
- 2.64 However, it is clear that there will be capacity for some additional homes to be delivered during the plan period to 2041 above current supply contained in the adopted 2018 Local Plans. In particular, we can be confident that there will be considerable capacity in terms of water supply once the new reservoir becomes operational in around 2035-37 and the piping of water to the area from around 2030 may also provide additional capacity.
- 2.65 See below the further work we plan to complete to confirm a position.
- 2.66 In relation to housing delivery assumptions, the Housing Delivery Study (2021) and earlier Interim Findings (2020) provide a detailed analysis of housing delivery in Greater Cambridge, along with tables of data comparing build out rates and lead in times for strategic scale developments across the OxCam Arc and to Lichfield's Start

to Finish report recommendations, and a literature review of published housing delivery information including from Inspectors' Reports and other research reports.

- 2.67 From their research, AECOM within the Housing Delivery Study (2021) recommend to the Councils a series of assumptions for lead-in times and build out rates for strategic and non-strategic sites, and depending on the location and / or anticipated housing mix for the site. AECOM also allow for variations from its recommendations where there is site specific evidence to support a different approach.
- 2.68 The Councils have used, and will continue to use, in the preparation of their housing trajectories lead-in times and build out rates recommended in the Housing Delivery Study (2021), but also any site specific information gathered through engagement with promoters/developers on their anticipated delivery strategies and timetables, the likely delivery of specific infrastructure, or the relocation of existing uses.
- 2.69 In calculating anticipated housing completions from windfall sites within the plan period, the Councils have considered whether there is compelling evidence that windfall sites will continue to be a reliable source of housing supply, as required by the NPPF (2021). The Housing Delivery Study (2021) considers historic delivery from windfall sites within Greater Cambridge, and provides recommendations in terms of levels of future anticipated housing supply from windfall sites. The Housing Delivery Study – Addendum (2022) continues to provide justification that windfall sites will continue to be a reliable source of supply. The Councils' approach to considering housing delivery from windfall sites is robust, and takes account of historic delivery and future supply as required by the NPPF (2021).

#### Distribution of development

- 2.70 Our First Proposals development strategy sought to “direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way. It also seeks to be realistic around the locational limits of some new jobs floorspace which is centred upon national and global economic clusters”. No new evidence submitted to the First Proposals has affected these principles, which influenced a blended strategy to meet a variety of needs, focusing growth at a range of the best performing locations in terms of minimising trips by car.
- 2.71 Our transport evidence supporting the First Proposals demonstrated that North East Cambridge and Cambridge East in particular align with the First Proposals development strategy principles, including being in locations within Cambridge urban area and the edge of Cambridge – outside the Green Belt that minimise the need for

car trips (see Part 2), and being of a scale that can allow for more internalisation of trips within each site. Cambridge Biomedical Campus is also in a location that performs well in transport terms; this will improve further when Cambridge South Station opens. There are no other strategic sites available for development in these broad spatial locations.

- 2.72 Relevant to North East Cambridge and Cambridge East, our transport evidence informing the First Proposals showed that larger developments accommodating a wide mix of uses allow for more 'internalisation' of trips within the site, thereby minimising associated carbon emissions. Our strategic spatial options testing also demonstrated that strategic scale development would support viable delivery of infrastructure including green infrastructure. We recognise that strategic scale sites can be complex and slow to bring forward in that they may be reliant on delivery of significant infrastructure items; equally, once being built out, such sites can provide a steady supply of development across a large number of years to support overall supply. Strategic sites enable provision of large numbers of affordable homes in accessible locations. Whilst in the past strategic sites within Greater Cambridge have not always delivered policy compliant levels of affordable housing, revised national planning guidance is clear that plan-level infrastructure and viability evidence for strategic sites should confirm costs including for infrastructure, and ensure that proposals for development are policy compliant.
- 2.73 As explored further under S/CBC, Cambridge Biomedical Campus is an important location for the City, of national and international importance for health, life-sciences and biotechnology. As such the Greater Cambridge Local Plan needs to provide a policy framework to guide its development, including providing a comprehensive approach that carefully considers the need for different land uses alongside infrastructure delivery and transport.
- 2.74 Drawing on the above, we consider there is a strong rationale for the inclusion of development at North East Cambridge, Cambridge East and the existing Cambridge Biomedical Campus as central building blocks of any development strategy.
- 2.75 We are not proposing a full development strategy at this point. However, if additional development beyond North East Cambridge, Cambridge East, and Cambridge Biomedical Campus (potentially including a further Green Belt release – see next section) was shown to be deliverable in housing delivery terms and would also not have unacceptable environmental impacts in relation to water supply, we would propose to use the development strategy principles that informed the First Proposals development strategy to inform the identification of any additional sites that may be necessary to meet the 2022 housing and employment targets. As such we would expect to reach a view on the sites included in the First Proposals as a first step, alongside reviewing other available sites including new sites submitted to the First

Proposals consultation. Within this process we would consider again the justification for including new strategic scale development identified as an expansion of Cambourne within the development strategy, noting that the recent announcement in the government's Autumn Statement confirming East West Rail provides additional confidence regarding the delivery of that infrastructure proposal.

### **Additional alternative approaches considered**

2.76 Given current uncertainties with regards to water supply and associated housing delivery in Greater Cambridge, it is not possible to be sure which new options for growth are likely to be deliverable and hence which can be considered reasonable alternatives. As such, we have started to consider the sustainability implications of the potential reasonable alternatives for growth levels that might form the target for the draft Local Plan. This will help to inform the definition of new reasonable growth options for Greater Cambridge once evidence on matters affecting deliverability (such as water resource availability and achievable housing delivery rates) becomes more certain.

[Potential reasonable alternative: Plan for an employment land and housing target that meets our objectively assessed needs for jobs and homes in full.](#)

2.77 As above, we don't know currently if this is a reasonable or realistic alternative in terms of water supply or housing delivery. If it does become a reasonable alternative then the environmental, social and economic implications set out in the section above would apply.

[Potential reasonable alternative: Plan for an employment land and housing target lower than our objectively assessed needs](#)

2.78 As above, it is unclear at this point as to what the specific level of employment and housing would be that would ensure no unacceptable harm due to water supply. In principle, not meeting our objectively assessed needs may result in social and equalities impacts such as potential increasing affordability issues and less affordable housing being provided in the area, and climate impacts arising from more longer distance commuting.

### [Distribution of development](#)

2.79 Regarding the distribution of development, the Councils explored a wide range of alternative options in developing the First Proposals. Full information regarding the testing of these alternatives can be found in the Sustainability Appraisal

accompanying the First Proposals. At this point in time we have not identified any additional alternative approaches.

2.80 This Development Strategy Update does not set out a full strategy to meet development needs. Once we have done this we will consider whether there are any additional reasonable alternative approaches.

### Response to issues raised in representations

2.81 Responses to issues raised in representations include:

- **Arguments for more development:** Our in principle approach to planning for employment and housing is to meet our objectively assessed needs, which, drawing on the methodology to calculate these, would support economic growth, mitigate against additional longer term commuting, and help limit further affordability pressures associated with housing delivery lagging behind employment growth. Planning for employment and housing beyond this level is unlikely to be achievable, noting the findings of our Housing Delivery Study – Addendum (2022), and that the higher employment scenario is described as ‘less likely’ by our consultants, and would have additional environmental impacts. Beyond this in principle position we are not yet able to confirm how much employment and housing we can plan for that can be delivered in a sustainable way.
- **Arguments for less development:** Planning for less than our objectively assessed needs would not meet national policy requirements to meet objectively assessed needs and support economic growth, and could result in social and equalities impacts such as potential increasing affordability issues and less affordable housing being provided in the area, and climate impacts arising from more longer distance commuting. Beyond this in principle position we are not yet able to confirm how much employment and housing we can plan for that can be delivered in a sustainable way.
- **Providing flexibility:** We propose to plan positively to provide new land for the identified undersupply in particular types of employment, unless evidence identifies an insurmountable problem with achieving that in a sustainable way. This positive approach would ensure a flexible supply over the plan period and beyond, recognising the particular needs of the Greater Cambridge economy. For homes we plan to provide a flexible supply of homes to meet our needs, again subject to evidence not identifying an insurmountable problem with achieving that in a sustainable way. Further to this we have flexibility to respond to change from our policy approaches via future plan reviews.
- **Housing delivery challenges:** Our consultants have developed recommendations in terms of a windfall allowance, and lead-in time and build out rates for strategic and non-strategic sites that vary depending on the location and / or anticipated housing mix for the site. We propose to continue to use these

recommendations when preparing the housing trajectory for inclusion in the Local Plan, as they have been developed having undertaken a detailed analysis of housing delivery in Greater Cambridge (including comparing the data to other areas and national research), following a literature review (including Inspectors Reports), and having considered whether past trends will continue into the future. Our consultants have confirmed that their recommendations continue to be realistic and reliable for use in plan-making in the Greater Cambridge area having considered the issues raised in representations on the First Proposals.

- **Need for supporting infrastructure:** We recognise the importance of ensuring infrastructure is delivered to support development. We will produce a full infrastructure delivery plan to support the draft plan consultation.
- **Need to consider water supply:** We are working with relevant partners (Environment Agency and Natural England) to understand the implications of water supply on the draft local plan targets for jobs and homes, to inform a conclusion regarding the most appropriate targets for jobs and homes to include in the draft Local Plan, as well as to consider site specific sustainability implications of potential solutions to the additional growth.
- **Need to account for COVID-19:** Our Authority Monitoring Report monitors key indicators relating to the adopted Local Plans. Our 2022 updated employment and housing evidence accounts for COVID-19 impacts. We will keep our evidence up to date as appropriate to inform later stages of plan-making, and we have flexibility to respond to change via future plan reviews.
- **Overarching development strategy challenges:** We note strong support for the First Proposals overarching strategy approach. No new evidence submitted to the First Proposals has affected these principles. Our transport evidence supporting the First Proposals demonstrated that North East Cambridge and Cambridge East are the best performing new strategic scale sites available for development within Greater Cambridge, and are in broad locations that best align with the First Proposals strategy principles. There are no alternative strategic scale sites available for development in these broad locations. We are not proposing a full development strategy at this point, but propose to retain these principles in identifying sites to meet our needs, subject to the water and housing delivery constraints. Further issues relevant to specific strategic sites are addressed in their respective policies.
- **Scale of development challenges:** Our transport evidence informing the First Proposals showed that larger developments accommodating a wide mix of uses allow for more ‘internalisation’ of trips within the site, support viable delivery of infrastructure including green infrastructure and can provide a steady supply of development across a large number of years to support overall supply. As such we consider there is a strong rationale for the inclusion of strategic scale sites within our development strategy. Further issues relevant to specific strategic sites are addressed in their respective policies.

- **Need to consider transport and other infrastructure, including East West Rail:** We are not currently proposing a full development strategy at this point such that this issue is not relevant to decisions being taken in early 2023. We will respond to this issue for the draft plan consultation.
- **Spatial directions/broad locations challenges:**
  - Our evidence and Sustainability Appraisal supporting the First Proposals consultation identified that locating development within Cambridge urban area forms a highly sustainable development option, primarily relating to the accessibility to existing facilities and services of sites within this broad location, and that the edge of Cambridge can be a sustainable location for homes and jobs (setting aside issues relating to Green Belt), being accessible to existing jobs and services, particularly where development is planned at sufficient scale to support new infrastructure. No new evidence was submitted to the First Proposals that would change our understanding of this. Impacts and delivery issues beyond this are site specific, and as such are addressed in their respective policies.
  - We are not currently proposing a full development strategy at this point such that issues beyond the above are not relevant to the decisions being taken in early 2023, but will be taken into account in the preparation of the full draft plan and a response to those further issues will be provided at that time.

### Further work and next steps

2.82 Further work is required to confirm a full development strategy, including the following tasks:

- Concluding the most appropriate targets for jobs and homes to include in the draft Local Plan, drawing on further work to understand the implications of both water supply and housing delivery on the draft local plan targets for jobs and homes to ensure a sustainable development strategy. This work will include in particular:
  - Completing an update to the Councils' Water Cycle Strategy once Cambridge Water's draft Water Resource Management Plan is published
  - Undertaking further work to justify the use of a stepped housing requirement, to develop the appropriate timings for the 'steps' to happen, and the annual housing requirement that is deliverable for each step.
- Identifying further sites beyond North East Cambridge, Cambridge East and Cambridge Biomedical Campus, if needed to meet our identified targets, building on First Proposals development strategy principles, and considering in particular:
  - Housing delivery considerations, drawing on the recommendations of the Housing Delivery Study 2021 and the Addendum 2022

- site specific sustainability implications of potential solutions to the additional growth.
- Preparing the housing trajectory for inclusion in the draft Local Plan, taking account of:
  - The representations received on the site specific housing trajectories included in First Proposals,
  - Updated information gathered in the preparation of the annual update to the Greater Cambridge Housing Trajectory for 2020-2041 and beyond (to be published by 1 April 2023), with any adjustments necessary to take account of amendments to existing allocations made in the draft Greater Cambridge Local Plan,
  - Updated information gathered on anticipated delivery of dwelling equivalents from communal accommodation (use class C2) for older people and students,
  - Information gathered (where possible) from the developers/promoters of each of the new allocations included in the draft Greater Cambridge Local Plan, and
  - The recommendations from the Housing Delivery Study (2021) and the further clarification provided in the Housing Delivery Study – Addendum (2022).

2.83 Notwithstanding the current uncertainties, given the current understanding, it would be prudent to explore the potential ways forward in the event that it is concluded, taking account of all the evidence, that it is not reasonable or realistic to plan to meet our needs in full. This includes asking our neighbouring authorities if they have potential to provide for any of the outstanding needs in their area. This has already been done as part of preparing the First Proposals as required by national planning policy in cases where there is Green Belt in the area even though we were planning to meet our needs in full at that time, and it did not result in any suggested sites coming from our neighbours. However, in light of the increased needs and potential constraints in terms of water supply and housing delivery, it is appropriate to repeat those consultations explaining the latest position and asking the question again. If that does not result in additional supply to meet our new needs in full, the Councils would likely have to put forward a plan that does not demonstrate that needs will be met in full and argue through the examination process that it can be found sound. This eventuality was highlighted in the First Proposals.



## Part 2: Approach to site allocations supporting the preferred spatial strategy

### 1 S/NEC North-East Cambridge

#### Issue the plan is seeking to respond to

- 1.1 To provide policy guidance for future development of the North-East Cambridge site.

#### Policy context update

- 1.2 There have been no changes to the adopted 2018 Local Plan policy context relevant to North East Cambridge that informed the First Proposals.
- 1.3 Notwithstanding, subsequent to the First Proposals consultation, in January 2022 Cambridge City Council and South Cambridgeshire District Council considered and approved the Proposed Submission North East Cambridge Area Action Plan (AAP). The proposed submission version is effectively a final draft which the Councils propose to adopt. Prior to formal public consultation on the Proposed Submission AAP, the Councils have now paused the AAP process until a decision has been made on the separate Development Consent Order process for the relocation of the Cambridge Waste Water Treatment Plant. This is because the Area Action Plan is predicated on the existing Waste Water Treatment Plan being relocated off-site, which will enable this new district to come forward, and the Development Consent Order being prepared by Anglian Water under a separate process is an important part of showing that the Area Action Plan can be delivered.

#### Summary of issues arising from First Proposals responses

- 1.4 Issues raised in representations included:
- **Objections relating to relocation of the Waste Water Treatment Plant:** objections were made to development at North East Cambridge and the policy approach, due to reliance on the relocation of the Waste Water Treatment Plant (WWTP) to Green Belt land. Concern was raised regarding the demolition of an operational sewage plant, and the subsequent impact of a new WWTP at Honey Hill. Suggested that the policy should be reconsidered, and some comments suggesting Cambridge East as an appropriate alternative site for development.
  - **Support for development:** Some support for delivery of a sustainable regeneration in a sustainable location with good accessibility, with support from Historic England, Gonville & Caius College, Anglian Water Services Ltd, some parish councils and developers. Other comments supported the need for

provision of retail and leisure facilities within a 15-minute radius to support the local community without having to travel elsewhere.

- **Deliverability challenges:** Further concern raised for the deliverability of 4,000 homes in the plan period, particularly affordable housing and infrastructure dependent on a successful DCO process.
- **Concern for impacts:** Concern for the unprecedented higher density and heights in a Cambridge context. Comments thought residential development should be planned at a lower density, with affordable homes to accommodate families. Other objections due to the lack of green open space provision, and concern for over-reliance on existing provision such as Milton Country Park and Wicken Fen.

### **New or updated evidence**

- 1.5 No new evidence has been completed to inform the proposal for development at North East Cambridge (NEC) beyond that supporting the NEC Area Action Plan (AAP) Proposed Submission and the Greater Cambridge Local Plan First Proposals.
- 1.6 We note from the [Planning Inspectorate website](#) that the Development Consent Order (DCO) for the relocation of Cambridge Waste Water Treatment Plant is expected to be submitted to the Planning Inspectorate in early (quarter 1) 2023. This provides confidence that the DCO process will commence and be concluded within the timeframe currently set out. Based upon the DCO being granted, we can expect the full North East Cambridge site to be available for redevelopment around the middle of the plan period.

### **Draft policy approach, reasons and alternatives considered**

#### **Draft policy approach**

- 1.7 The proposed policy approach is that the Greater Cambridge Local Plan should include and prioritise delivery of North East Cambridge as an important part of the development strategy, to deliver an inclusive, walkable, low-carbon new city district, with detailed policy requirements including the quantum and nature of the proposed development as well as the timing and phasing of delivery to be addressed in preparing the draft Local Plan, informed by the approach of the plan in respect of water supply and housing delivery.

#### **Reasons for draft policy approach**

- 1.8 As noted in the Development Strategy topic paper (2021) supporting the First Proposals, our evidence and Sustainability Appraisal show that that densification of urban areas relevant to North East Cambridge forms a highly sustainable development option, with very good access to services, facilities, public transport

links, established employment hubs, and the main commercial and retail centres. Beyond this, noting that our evidence shows that location is the biggest factor in impacts on carbon emissions, [Greater Cambridge Local Plan: Transport Evidence Report 2021](#) data shows that North East Cambridge is the best performing new strategic scale location available for development within Greater Cambridge, showing a car mode share of 25% and daily car trips per dwelling of 1.36 under the Preferred Option fully built out with mitigation model run (see section 14.3, and also Table 13 Additional car trips per additional dwelling or job).

- 1.9 The impact of the proposed development at North East Cambridge has been carefully considered across a range of issues, including those related to the environment and biodiversity, infrastructure provision, health and wellbeing and community cohesion and placemaking. These have informed the preparation of the Proposed Submission North East Cambridge Area Action Plan (see the [Document Library supporting the Proposed Submission AAP](#) for more detail). The impact of the relocation of the WWTP to an off-site location, including the impact on the Green Belt, the environment and water discharge into the River Cam, will be considered as part of the separate DCO process. The outcome of the DCO process will inform the Local Plan Sustainability Appraisal in terms of its in-combination effects with other plans and projects, as noted in the Sustainability Appraisal accompanying the First Proposals.
- 1.10 The Councils previously considered a medium growth approach to NEC that did not require the relocation of the WWTP, but rather included a reconfiguration of the existing WWTP into a more condensed form as part of the initial stages of preparing the North East Cambridge AAP (see Issues and Options 2014). However the cost of reconfiguring and/or relocating the existing WWTP within its current site was not considered to be achievable in its own right. This approach also does not make best use of brownfield land (as required by the NPPF) in Cambridge, noting as above that North East Cambridge is the best performing new strategic scale location available for development within Greater Cambridge in transport terms. The HIF funding secured to pay for the WWTP relocation costs enables the site to be made available for a comprehensive approach to development and is on the basis of ambitious housing delivery targets being met. Allocating the site for a significant amount of employment uses with little or no housing provision would also require the councils to meet our housing need for the area at alternative sites across Greater Cambridge, in less suitable locations based on the evidence prepared to inform the Local Plan strategy options. Secondly, it would also worsen the existing issue of significant amounts of in-commuting into the area, which already results in peak period congestion of the surrounding road network. The provision of housing assists with maximising internal trips and benefits from the sustainable transport interventions needed to enable even modest levels of employment intensification. The proposed allocation seeks to try and create a good balance between homes and jobs and a

range of uses at North East Cambridge that overcomes the need to further increase highway capacity in the area, promotes and prioritises sustainable travel and foster successful place making.

- 1.11 Given the scale of our identified need for jobs and homes, to not include strategic scale employment and housing at NEC would require the Councils to meet our jobs and housing need for the area at alternative sites across Greater Cambridge in addition to Cambridge East. This would mean providing strategic scale development in less suitable locations, in either another strategic site or via a dispersed approach, based on the evidence prepared to inform the Local Plan strategy options.
- 1.12 The proposed allocation, has undergone viability testing as part of wider Local Plan viability testing as well as the North East Cambridge AAP which takes into account significant site constraints, including land remediation, as well as engagement with landowners to confirm delivery assumptions. These studies confirm that development at North East Cambridge is viable, robust and that a policy compliant provision of affordable housing as well as necessary infrastructure can be delivered.
- 1.13 Drawing on the sections above, no new evidence or representations have changed the Councils' position from the First Proposals, that North East Cambridge makes the best use of land by placing homes, jobs and other supporting services and facilities within the existing urban area of Cambridge. The Councils approved the Proposed Submission North East Cambridge Area Action Plan for future public consultation, contingent upon the separate Development Control Order being undertaken by Anglian Water for the relocation of the Waste Water Treatment Plant being approved, concluding that it would comprise sustainable development. Information regarding the expected submission of the DCO for the relocation of Cambridge Waste Water Treatment Plant, which has already undergone three stages of public consultation in preparation for the formal submission, provides a reasonable level of confidence for this stage in the plan making process that we can expect the full site to be available for redevelopment by the middle of the plan period, enabling significant delivery of jobs and homes by 2041, subject to the approach of the plan in respect of water supply. As made clear in the Greater Cambridge Local Development Scheme, the Local Plan and the North East Cambridge Area Action Plan are both predicated on the relocation of the Water Treatment Works taking place and will not proceed to the Proposed Submission Stage (Regulation 19) unless and until the DCO has been approved.

#### **Additional alternative approaches considered**

- 1.14 No additional alternative approaches have been identified beyond those supporting the First Proposals. Within Cambridge Urban Area there are no alternative new strategic scale sites that are available for development.

## Response to issues raised in representations

1.15 Responses to issues raised in representations include:

- **Objections relating to objection to relocation of the Waste Water Treatment Plant:**
  - The impact of the proposed development at North East Cambridge has been carefully considered across a range of issues. The impact of the relocation of the WWTP to an off-site location, including the impact on the Green Belt, the environment and water discharge into the River Cam, will be considered as part of the separate WWTP DCO process being undertaken by Anglian Water. The outcome of the DCO process will inform the Local Plan Sustainability Appraisal in terms of its in-combination effects with other plans and projects, as noted in the Sustainability Appraisal accompanying the First Proposals.
  - Pursuing a medium growth approach to NEC that does not require the relocation of the WWTP would not be achievable in terms of the cost of reconfiguring the existing WWTP, and would not make best use of brownfield land. Allocating the site for a significant amount of employment uses with little or no housing provision would require the Councils to meet our jobs and housing need for the area at alternative, less sustainable, sites, and would also worsen the existing issue of significant amounts of in-commuting into the area.
  - North East Cambridge and Cambridge East are the most sustainable new strategic scale locations available to meet our objectively assessed needs for development; not including development at North East Cambridge would require the Councils to meet our jobs and housing need for the area at alternative, less sustainable, sites.
- **Support for development:** North East Cambridge forms a highly sustainable development option, including being the best performing new strategic scale location available for development within Greater Cambridge in transport terms. In accordance with the NPPF, by promoting the effective use of land on previously development or brownfield land, including supporting the development of under-utilised land and buildings, the proposed policy approach at North East Cambridge seeks to make the best use of land by placing homes, jobs and other supporting services and facilities within the existing urban area of Cambridge.
- **Deliverability challenges:** Information regarding the expected submission of the DCO for the relocation of Cambridge Waste Water Treatment Plant provides confidence that we can expect the full site to be available for redevelopment by the middle of the plan period, enabling significant delivery of jobs and homes by 2041. Infrastructure and viability

evidence supporting the AAP confirm that development at North East Cambridge is viable, robust and that a policy compliant provision of affordable housing as well as necessary infrastructure can be delivered.

- **Concern for impacts:** Representations on this topic are not relevant to the decisions being taken in early 2023 relating to the principle of development at North East Cambridge, but will be taken into account in the preparation of the site allocation policy for inclusion in the full draft plan and a response to those further issues will be provided at that time.

### Further work and next steps

- 1.16 A decision at this point on the inclusion of the site in the draft Local Plan will provide further confirmation of the redevelopment potential of the site established in the Proposed Submission NEC AAP and its intended inclusion as a key part of the development strategy of the new Local Plan. It will also inform the Development Consent Order process being undertaken by Anglian Water for the relocation of the WWTP, which in turn will form a critical part of the evidence supporting the Local Plan that will enable it to progress to the proposed submission stage.

## 2 S/CE Cambridge East

### Issue the plan is seeking to respond to

- 2.1 To provide policy guidance for future development of land at Cambridge East – both the safeguarded land in the 2018 Local Plans and the adopted allocations for North of Newmarket Road and North of Cherry Hinton.

### Policy context update

- 2.2 There have been no changes to the policy context relevant to Cambridge East that informed the First Proposals.

### Summary of issues arising from First Proposals responses

- 2.3 Issues raised in representations included:
- **Support:** Supportive responses expressed a desire for mixed-use development, climate friendly homes, affordable housing and sustainable transport links.
  - **Concern for impacts:** Concerns were expressed regarding the development's potential impact on congestion, infrastructure, landscape, loss of jobs and potential exclusion of citizens who do not use public transport.
  - **Deliverability challenges:** concerns raised regarding reliance on the relocation of the current airfield, particularly the uncertainty of timing of the relocation of airport and related uses, unforeseen delays in relocation affecting the delivery of housing within the plan period (including affordable housing) and reliance on the GCP Cambridge Eastern Access scheme.

### New or updated evidence

- 2.4 Greater Cambridge Shared Planning has been engaging with Marshall on the approach to developing the site under a Memorandum of Understanding to help inform work towards the draft Local Plan, including on constraints and capacity testing, building on Marshall's submission to the Councils through the Call for Sites and the First Proposals consultation.
- 2.5 In relation to the availability of the site for development, Marshall of Cambridge (Holdings) Limited submitted an outline planning application (reference CB/22/04299/OUT) to Central Bedfordshire Council in November 2022 for relocating the Airport operations to Cranfield Airport. Details of the application are available on the [Central Bedfordshire website](#). The stated target date for determination is February 2023. The [Marshall Aerospace news release regarding the application](#) notes "Subject to planning approval, Marshall Aerospace intends to be operational at Cranfield during 2026 and to have vacated its current home at Cambridge Airport by 2027". This application provides strong evidence of the intent of Marshall to relocate



its airport uses, and that we can expect Cambridge Airport to be available for redevelopment by the middle of the plan period.

- 2.6 In relation to the delivery of infrastructure to support the site, the First Proposals identified that delivery of the full development will require the Greater Cambridge Partnership Cambridge (GCP) Eastern Access scheme Phase B to be in place which will provide high quality public transport connections, with the amount of development that can come forward ahead of the scheme to be determined. In September 2022 [GCP Executive Board](#) noted the preference for option P1 for the relocated Park and Ride site, subject to production of an Outline Business Case and associated consultation. The preferred location of the relocated Park and Ride site would support effective development at Cambridge Airport. Beyond this, engagement with GCP has highlighted that the majority of the route for the Cambridge Eastern Access scheme Phase B is within the Cambridge Airport site boundary. As such, gaining consent for the scheme and practical delivery of the scheme can take place alongside the planning and delivery process for the redevelopment of the site. Drawing on the above, we consider the delivery and timing risks associated with Cambridge Eastern Access scheme Phase B as part of the overall delivery of Cambridge East to be low.

## **Draft policy approach, reasons and alternatives considered**

### **Draft policy approach**

- 2.7 The proposed policy approach is that Greater Cambridge Local Plan should include and prioritise delivery of Cambridge East, as an important part of the development strategy, to provide a major new eastern quarter for Cambridge, with detailed policy requirements including the quantum and nature of the proposed development as well as the timing and phasing of delivery to be addressed in preparing the draft Local Plan, informed by the approach of the plan in respect of water supply and housing delivery.

### **Reasons for draft policy approach**

- 2.8 This site's suitability for development was previously established through its inclusion in the Cambridge Local Plan 2006, South Cambridgeshire Core Strategy 2007 and Cambridge East Area Action Plan 2008, and then being identified as safeguarded land for future development in the adopted 2018 Local Plans. The First Proposals Strategy topic noted that allocating land for development at Cambridge Airport would make good use of this safeguarded land in the 2018 Local Plans, and that is also a brownfield site and is a good fit with a climate focused strategy. As noted in the Strategy topic paper supporting the First Proposals, our evidence and Sustainability Appraisal show that the edge of Cambridge non-Green Belt is a sustainable location



for homes and jobs, being accessible to existing jobs and services, particularly where development is planned at sufficient scale to support new infrastructure. Beyond this, noting that our evidence shows that location is the biggest factor in impacts on carbon emissions, [Greater Cambridge Local Plan: Transport Evidence Report 2021](#) data shows that in transport terms Cambridge East is in the second best performing new strategic scale location available for development within Greater Cambridge, being the edge of Cambridge non-Green Belt, showing a car mode share of 35% and daily car trips per dwelling of 1.91 under the Preferred Option fully built out with mitigation model run (see section 14.4, and also Table 13 Additional car trips per additional dwelling or job). There are no other strategic sites available for development in this broad spatial location.

- 2.9 Policy S/CE Cambridge East in the First Proposals set out a requirement for a Trip Budget approach, to ensure that the level of vehicle trips is limited to an appropriate level for the surrounding road network. We are currently undertaking capacity testing, working with Cambridgeshire County Council as Highways Authority, and engaging with Marshall, to confirm development levels that would be deliverable within the vehicle trip budget, including proposing a good balance between homes and jobs in order to reduce the need to travel and foster successful place making. As also set out in the First Proposals policy, through the preparation of the draft local plan, the potential need for, or desirability of, other connections by new public transport, cycling and walking links to centres of employment and other sustainable transport connections, such as Cambridge North Station and North East Cambridge, Cambridge South Station and Cambridge Biomedical Campus, and Cambridge Station and the City Centre will be explored, including their deliverability.
- 2.10 The Councils are keen to ensure that Cambridge East, and Greater Cambridge more widely, retains a range of jobs including those accessible to local communities. We are engaging with Marshall to understand the workforce impacts of the relocation of the airport, including stating the Councils' desire to retain a mix of employment on site. To date, we understand that while employment directly associated with airport uses will move, Marshall intend to retain an employment presence at the site. Beyond this, in developing the policy ahead of draft plan we are following the principle set out in the First Proposals for the site to include a mix of employment uses, including offices, workshops and other uses, providing a variety of opportunities to support not only Cambridge's high technology clusters, but also industry and creative uses, including local jobs to provide for existing communities and help contribute to community integration. To support this work our employment evidence will advise on appropriate employment uses for the site.
- 2.11 The First Proposals stated that development of the site would retain a green corridor through the development to link the countryside with Coldham's Common and the heart of Cambridge, that lies within the Green Belt in the adopted 2018 Local Plans,

and has a landscaping, biodiversity and recreation function whilst also maintaining the individual identity of Teversham village. Initial landscape, biodiversity and green infrastructure work has been completed following these principles, including exploring offsite impacts and opportunities. In addition, a Heritage Impact Assessment is being undertaken to understand local and wider heritage impacts. Whilst detailed implementation will still need to be resolved, the issues identified are considered capable of being suitably addressed at this point. To confirm, the Councils consider there are no exceptional circumstances for releasing the land in the area to the east of the airport from the Green Belt.

2.12 It is crucial that sites like this take strong measures to reduce their need for potable water. The proposed policy approach in the First Proposals did not include a specific policy element regarding water supply. In preparing the draft plan it will be considered whether specific criteria should be added to this policy, or whether issues are addressed by Policy CC/WE: Water efficiency in new developments.

2.13 Marshall's submission of an application for relocation of their airside uses to Cranfield provides good evidence that we can expect Cambridge Airport to be available for redevelopment by the middle of the plan period, enabling significant delivery of jobs and homes by 2041, with the timing and phasing subject to the approach of the plan in respect of water supply and housing delivery.

2.14 Drawing on the sections above, no new evidence or representations have changed the Councils' position from the First Proposals, that Cambridge East:

- would make good use of safeguarded land in the 2018 Local Plans, that is identified as suitable for development in the extant Cambridge East Area Action Plan 2008, and that is also a brownfield site and is a good fit with a climate focused strategy.
- Can be deliverable and sustainable in transport terms
- Will provide a range of jobs including for local communities
- Can be designed to mitigate its landscape and character impacts
- Will be available for redevelopment in time to enable significant delivery of jobs and homes by 2041.

### **Additional alternative approaches considered**

2.15 No additional alternative approaches have been identified beyond those supporting the First Proposals. Within the Edge of Cambridge outside of the Green Belt there are no alternative strategic scale sites available for development.

### **Response to issues raised in representations**

2.16 Responses to issues raised in representations include:

- **Support:** Cambridge East Cambridge forms a sustainable development option, including being the second best performing new strategic scale location available for development within Greater Cambridge in transport terms. As such, Cambridge Airport would make good use of safeguarded land in the 2018 Local Plans that is also a brownfield site and is a good fit with a climate focused strategy. Within the Edge of Cambridge outside of the Green Belt there are no alternative strategic scale sites available for development.
- **Concern for impacts:** We are exploring constraints and capacity testing at Cambridge East ahead of the draft Local Plan, including considering transport, landscape and character impacts, and the loss of jobs associated with the relocation of the airport. Our evidence shows that development here can be deliverable and sustainable in transport terms, and we consider that the development can be designed to mitigate its landscape and character impacts, and will provide a range of jobs including for local communities.
- **Deliverability challenges:** Marshall's submission of an application for relocation of their airside uses to Cranfield provides good evidence that we can expect Cambridge Airport to be available for redevelopment by the middle of the plan period. We also consider the delivery and timing risks associated with Cambridge Eastern Access scheme Phase B, which will support development of the site, to be low. As such we expect there to be time for a substantial amount of development to take place within the plan period to 2041, subject to the approach of the plan in respect of water supply and housing delivery.

### Further work and next steps

- 2.17 A decision at this point on the inclusion of the site as a key part of the development strategy of the draft Local Plan will help give confidence to Marshall to continue to develop their relocation proposals, which in turn will form a critical part of the evidence supporting the Local Plan as it progresses to the proposed submission stage.
- 2.19 Under the agreed Memorandum of Understanding referred to above, the Councils will continue to work with Marshall to complete the capacity testing and design exercise, which will inform policy development for the draft Local Plan.

### 3 S/CBC Cambridge Biomedical Campus

#### Issue the plan is seeking to respond to

- 3.1 To provide policy guidance for development on the Cambridge Biomedical Campus, and consider whether exceptional circumstances exist such that further land identified in the First Proposals should be released from the Green Belt and allocated for development as an extension to the Campus.

#### Policy context update

- 3.2 There have been no changes to the policy context relevant to Cambridge Biomedical Campus that informed the First Proposals.

#### Summary of issues arising from First Proposals responses

- 3.3 Issues raised in representations included:
- **Support:** Several respondents supported the proposal, noting that it reflected Cambridge's strengths.
  - **Support for improving existing Campus:** Comments hoped a new masterplan could improve traffic flow and amenity in the Campus.
  - **Concern regarding expansion of Campus into Green Belt:** Some respondents questioned the need to expand the Campus after COVID-19, others objected to the expansion due to concerns relating to sustainability, flooding, Green Belt harm, and its potential negative impact upon local birdlife.

#### New or updated evidence

- 3.4 Greater Cambridge Shared Planning is engaging with Cambridge Biomedical Campus who are exploring ways of making best use of the existing Campus, and seeking further evidence regarding the development needs case for exceptional circumstances for the proposed Campus expansion onto Green Belt land to the south.

#### Draft policy approach, reasons and alternatives considered

##### Draft policy approach

- 3.5 The proposed policy approach is that Greater Cambridge Local Plan should include the existing Cambridge Biomedical Campus, to meet local, regional or national health care needs or for biomedical and biotechnology research and development activities, related higher education and sui generis medical research institutes, associated support activities to meet the needs of employees and visitors, and residential uses where it would provide affordable and key worker homes for campus

employees. The councils will continue to explore and confirm whether an exceptional circumstances case can be made for the allocation of additional land to the south and its removal from the Green Belt. Detailed policy requirements including the quantum and nature of the proposed development as well as the timing and phasing of delivery will be addressed in preparing the draft Local Plan, informed by the approach of the plan in respect of water supply and housing delivery.

#### Reasons for draft policy approach

- 3.6 There are a range of issues with the current campus. As an important location for the City the Greater Cambridge Local Plan needs to provide a policy framework to guide its development, including providing a comprehensive approach that carefully considers the need for different land uses alongside infrastructure delivery and transport.
- 3.7 In addition to the existing campus, the First Proposals identified a potential further area for release from the Green Belt for development. The First Proposals stated that 'National planning policy is clear that once established, Green Belt boundaries should only be altered in exceptional circumstances, where this is fully evidenced and justified, through the preparation or updating of plans. Given the national and international importance of the Campus in health, life-sciences and biotechnology, and the significant public investment into the area with the new Cambridge South Railway Station, it is considered that it may be possible to demonstrate a case for exceptional circumstances to release land from the Green Belt in this location, but this needs to be balanced with the existing supply of employment land in the area, and the impacts on the environment and how they can be mitigated.'
- 3.8 In terms of the potential Green Belt release, evidence supporting the First Proposals confirmed that there would be harm to the purposes of the Green Belt as a result of the potential release identified, but this harm may be outweighed by the benefits of the development. Issues for consideration include the need for development, and the potential benefits to the creation of an enhanced campus.
- 3.9 The Councils have requested further information from the Cambridge Biomedical Campus (CBC) regarding needs, and why land may be needed in this location. This relates not just to the need for commercial research buildings, but also hospital and medical uses, supporting and community facilities, and residential development. The Councils have also requested further information regarding how further development could improve the existing campus. In response the Biomedical Campus are undertaking a significant masterplanning exercise building on their 2050 vision to explore the future of the campus, which includes engaging with stakeholders and local communities. This has focused on how the policy proposals identified in the

First Proposals could be implemented, rather than the significantly larger proposals that were submitted through the Local Plan First Conversation consultation in 2020.

- 3.10 The Councils will continue to review the evidence and consider need for the site, but currently consider that the case for Green Belt release continues to merit exploration given the national and international importance of the campus and opportunities for its improvement. While the inclusion of the additional land would be a departure from the adopted plans, it is the role of the plan review to consider whether circumstances warrant a different approach.
- 3.11 In weighing up the issues regarding including further development on Green Belt land the Councils will have to consider the loss of agricultural land, and impact on carbon emissions. Additional development will inevitably include a degree of embodied carbon. The standards proposed in the plan seek to reduce operational carbon generation. The location also benefits from significant investment in active travel and public transport infrastructure.
- 3.12 It is crucial that sites like this take strong measures to reduce their need for potable water. This should be considered at a strategic level across the campus. The proposed policy in the First Proposals does not include a specific policy element regarding water supply. In preparing the draft plan it will be considered whether specific criteria should be added to this policy, or whether issues are addressed by Policy CC/WE: Water efficiency in new developments.
- 3.13 The First Proposals suggested a number of policy criteria that would need to be addressed if the additional area adjoining Babraham Road (S/CBC-A) was released from the Green Belt to meet the long-term needs of the Campus. At this stage the section below considers whether these policy criteria are capable of being met, rather than confirming a particular approach or to endorse any specific masterplan proposals.
- 3.14 'Significant Green Belt enhancement in adjoining areas of White Hill and Nine Wells will be required, to provide green infrastructure and biodiversity improvements supporting the objectives of the Strategic Initiative 3: Gog Magog Hills and chalkland fringe. These areas would remain within the Green Belt and are included in the Area of Major Change to highlight that future proposals for built development on the allocated areas must also include green infrastructure and biodiversity improvements within its adjoining open area.'
- 3.15 The Green Belt enhancement would need to focus on biodiversity. This is likely to take the form of enhancement of the agricultural landscape to provide a better environment for wildlife, which will enable public access around specific routes and

locations. Whilst detailed implementation will still need to be resolved the issues identified are considered capable of being suitably addressed at this point.

- 3.16 The relationship with Ninewells Nature Reserve needs to be carefully managed but is capable of being addressed.
- 3.17 'Development is dependent on the successful implementation of a Trip Budget approach, to ensure that the level of vehicle trips is limited to an appropriate level for the surrounding road network.'
- 3.18 The campus will benefit from significant transport improvements including the Cambridge South Railway Station and Cambridge South East Public Transport Scheme, which also offers active travel options. A vehicular trip budget approach is capable of being implemented. Whilst detailed implementation still needs to be explored transport issues are considered capable of being addressed.
- 3.19 'A comprehensive landscaping plan, including the delivery of new publicly accessible green space will need to be delivered, to create a soft green edge of the city, to minimise the urbanising effects of the development and help compensate for harm to the Green Belt.'
- 3.20 As stated above, initial work exploring biodiversity mitigation suggests the focus of the land within the wider area of change and White Hill may be best suited to biodiversity enhancement rather than a formal approach to open space, but there would still be opportunities for public access and connections to green infrastructure within the campus and to the wider area. A site masterplan would need to provide comprehensive landscaping plan, including considering the approach to the city edge. Whilst detailed implementation will still need to be resolved, the issues identified are considered capable of being suitably addressed at this point.
- 3.21 Design parameters regarding the scale and height of buildings will be established, to respond to the landscape and townscape of Cambridge.
- 3.22 These detailed matters have not yet been addressed. Further work is being undertaken by the Councils to consider building heights, including heritage impacts, which will be available at the draft plan stage and to inform a future master planning process.
- 3.23 'Development on the additional land will only be allowed to take place when evidence is provided that opportunities on the existing campus have been fully explored and utilised before development takes place on the released land.'

- 3.24 Engagement with CBC so far does indicate potential for significant enhancement of the campus, and the potential for the proposed expansion land to help fund these improvements.
- 3.25 'Given the existing piecemeal development on the biomedical campus, any proposed release must contribute towards improving the wellbeing of campus users and surrounding communities, as well as addressing the spill over impacts on individuals and communities of this intensive employment location.'
- 3.26 There are a range of issues with the existing campus. Whilst there are some fantastic buildings and areas on the site, there are other areas which are underused, and do not provide a good environment for visitors and workers. Connections and movement within the site is also a mixed experience. There are significant opportunities to improve the existing campus. This includes providing a better range of facilities, improved movement corridors, and green infrastructure. This includes consideration of how facilities could also benefit surrounding local communities.
- 3.27 'The high water table and surface water flooding present challenges to development in this area. A comprehensive approach would be required to deliver sustainable drainage systems, which ensure the development is safe, and does not increase risk elsewhere.'
- 3.28 CBC have commissioned detailed flood modelling of the existing and proposed expanded campus, to identify how drainage scheme can serve the campus and avoid increasing flood risk elsewhere. Engagement is taking place with the lead local flood authority and the environment agency.
- 3.29 The First Proposals proposes to require 'An updated masterplan...for the Campus, to improve the overall experience of the site for workers and visitors. This should maximise opportunities to improve the 'legibility' of the Campus by providing a network of cycle and pedestrian routes, high quality new public realm and open space, but in particular explore opportunities to enhance connections with the proposed Cambridge South Railway Station'.
- 3.30 Such a masterplan could be created as a supplementary planning document to the Local Plan, or be agreed through the development management process. The issue will be considered further as the draft Local Plan policy is developed.
- 3.31 Drawing on the above, there is a clear and agreed case to make better use of the existing Campus. The case for Green Belt release continues to merit exploration given the international importance of the campus and opportunities for its improvement.



3.32 It should be noted that following the First Proposals Consultation an errata was published in relation to this policy approach. An error was identified in the online interactive version of the First Proposals. The third bullet in the Proposed Policy Direction for Cambridge Biomedical Campus (Policy S/CBC) was an error and did not reflect the wording agreed by the Councils for consultation. The interactive web based version of the First Proposals included a different third bullet to the pdf document version which was also available during the consultation. The PDF document version reflects what was agreed by the Councils for consultation and is correct. This error will be addressed at the next stage in the plan-making process. It is intended that an opportunity to make further representations specifically in respect of the paragraph included in error will be given at the next stage of consultation on the emerging plan.

### **Additional alternative approaches considered**

3.33 No additional alternative approaches have been identified beyond those supporting the First Proposals.

### **Response to issues raised in representations**

3.34 Responses to issues raised in representations include:

- **Support:** There is a clear and agreed case to make better use of the existing Campus. The case for Green Belt release continues to merit exploration given the international importance of the campus and opportunities for its improvement.
- **Support for improving existing Campus:** There is a clear and agreed case to make better use of the existing Campus. As an important location for the City the Greater Cambridge Local Plan needs to provide a policy framework to guide its development, including providing a comprehensive approach that carefully considers the need for different land uses alongside infrastructure delivery and transport.
- **Concern regarding expansion of Campus into Green Belt:** The Councils will continue to review the evidence and consider need for the site, but currently consider that the case for Green Belt release continues to merit exploration given the international importance of the campus and opportunities for its improvement. The First Proposals suggested a number of policy criteria that would need to be addressed if the additional area adjoining Babraham Road (S/CBC-A) was released from the Green Belt to meet the long-term needs of the Campus. At this stage we consider that these policy criteria are capable of being met; we will explore them further ahead of draft plan to come to a conclusion regarding the expansion of the Campus into Green Belt.

### **Further work and next steps**

3.28 The Councils will continue to develop policies for the draft Local Plan, including:

- Supporting a comprehensive approach to the redevelopment of the existing Biomedical Campus.
- Continuing to explore and confirm whether an exceptional circumstances case can be made for the allocation of additional land to the south and its removal from the Green Belt, and if so to propose its inclusion in the draft Local Plan.

# Appendix Jan 23-A: Evidence base assessments of 2022 growth levels

## Introduction

- 1 For the strategic growth and spatial options (SSOs) in November 2020 our evidence base consultants assessed three consistent housing and jobs growth levels: minimum, medium and maximum. Further to that, in 2021 the same consultants confirmed their assessment of the 2021 Preferred Options housing growth level of medium+ (the medium+ applied a 1:1 commuting assumption to the medium jobs figure, resulting in a modest increase in the 2020 medium homes figure) in relation to those previously tested growth levels, to ensure we had a consistent understanding of impacts (See [Strategy topic paper 2021, Appendix 1B: Evidence base assessments of the medium + growth level](#)).
- 2 We updated our employment and housing evidence to account for latest available data, which has identified updated 2022 minimum, medium and maximum growth levels. We sought to test the impacts of these to inform our decisions regarding the development strategy.
- 3 The approach to assessing the new 2022 growth levels needs to be the same as that undertaken for the medium+ growth level last year. Therefore, we need to reconsider the conclusions from evidence bases and Sustainability Appraisal in relation to the strategic growth and spatial options from November 2020 (the full testing of the minimum, medium and maximum growth levels) and 2021 (the testing of the medium+ growth level), to confirm whether considering the 2022 growth levels could reasonably have been anticipated to have resulted in different conclusions for the previously completed assessments of the growth and spatial options. If the answer to this question is yes we need to consider whether we already have sufficient information to understand what that different conclusion might be, or whether we need to test in full the impact of these updated growth levels.

## Analysis

- 4 Our employment and housing evidence consultants identified emerging evidence on employment and associated housing growth levels to inform our plan-making as follows:
  - **2022 minimum housing growth level:** derived from government's Standard Method Local Housing Need and associated employment level,
  - **2022 medium growth level:** derived from the 'central' 'most likely' employment scenario, and the homes required to support those jobs

- **2022 maximum growth level:** derived from updated a 'higher' 'less likely' employment and associated housing scenario

5 The table below provides a comparison of the emerging 2022 figures against all housing growth figures previously tested, including the medium+ figure tested in 2021.

**Table 2: Table of emerging 2022 growth levels alongside previous levels tested**

Growth levels and difference	2020 SSO minimum	2022 minimum	2020 SSO medium	2021 medium+	2022 medium	2020 SSO maximum	2022 maximum
Growth requirement annual housing figure	1,743	1,769	1,996	2,111	2,463	2,711	2,763
Growth requirement 2020-41	36,700	37,200	42,000	44,400	51,800	56,000	58,100
Total figure to find (growth req. + 10% buffer)	40,300	41,000	46,200	48,840	56,900	62,700	64,000
% of difference between SSO minimum and SSO medium	0%	9%	100%	-	-	-	-
% of difference between SSO medium and SSO maximum	-	-	0%	16%	65%	100%	-

- 6 Regarding these growth levels:
- **2022 minimum housing growth level:** We note that the difference between the 2020 SSO minimum housing growth level of 36,700 homes for the period 2020-41 (or 40,300 including a 10% buffer) and the 2022 minimum housing growth level of 37,200 homes for the period 2020-41 derived from an annual housing growth level of 1,796 (or 41,000 including a 10% buffer) is 500 homes (or 700 including the buffer).
  - **2022 medium housing growth level:** We note that the difference between the 2020 SSO medium housing growth level of 42,000 homes for the period 2020-41 (or 46,200 including a 10% buffer) and the 2022 medium housing growth level of 51,800 homes for the period 2020-41 derived from an annual housing growth level of 2,463 (or 56,900 including a 10% buffer) is 9,800 homes (or 10,800 including the buffer). To give an indication of the scale of change, the 2022 medium growth level is around 65% of the difference between the SSO medium and SSO maximum housing growth levels (SSO medium was 42,000 homes for the period 2020-41 (or 46,200 including a 10% buffer); SSO maximum was 57,000 homes 2020-41 (or 62,700 including a 10% buffer). This compares with the 2021 medium+ that was around 16% of the difference between the 2020 SSO medium and maximum.
  - **2022 maximum growth level:** We note that the difference between the 2020 SSO maximum housing growth level of 57,000 homes for the period 2020-41 (or 62,700 including a 10% buffer) and the 2022 maximum housing growth level of 58,100 homes for the period 2020-41 derived from an annual housing growth level of 2,763 (or 64,000 including a 10% buffer) is 1,100 homes (or 1,300 including the buffer).

### Key questions in relation to evidence published supporting the strategic growth and spatial options

- 7 The below questions and overall approach are consistent with the assessment undertaken with regard to the 'medium+' growth level and consulted upon as the 'First Proposals'. The key question to answer is whether consideration of the 2022 updated housing growth levels in relation to the strategic growth and spatial options would have resulted in materially different conclusions relating to the options, such that we need to test in full the impact of these updated growth levels, and in addition whether we need to retest the updated growth levels against all 10 previously tested options.
- 8 To help answer these questions we considered the following sub-questions for each of the evidence bases which completed an assessment of the strategic spatial options:
- a. Are there specific differences between conclusions for different 2020 SSO growth levels (i.e. not just an unquantified increase in the same impact?)

- b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?
- c. If yes to a and b, would this specific conclusion vary by spatial option?
- d. If yes to a and/or b and c, do we have sufficient information to make a conclusion about the impact of the updated 2022 growth scenarios, are we in the process of getting this, or is there a case that we should do substantive additional work to test these, and/or inform a comparative assessment of the previous 10 spatial options already assessed?

**Table 3: Responses to questions regarding updated growth levels**

Evidence theme/evidence base	Response to question a: Are there specific differences between conclusions for different 2020 SSO growth levels?	Response to question b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?	Response to question c: If yes to a and b, would this specific conclusion vary by spatial option?	Response to question c: comments
<i>Climate Change:</i> Water	Yes - quantitative assessment completed at strategic options stage. This assessment concluded that the medium growth strategy was feasible but was already stressing the water supply-demand balance locally. The maximum 2020 proposals were considered unsustainable because of the pressure this would place on the supply-demand balance. Subsequently the 2021 medium+ proposals were also considered sustainable.	<p>2022 minimum is a lower growth than 2021 medium+ and is therefore still acceptable.</p> <p>2022 medium is 7,400 homes more than 2021 medium+ (+17%) and likely to present further challenges in how a water supply-demand balance is met without detriment to the water environment. Without knowledge of how Cambridge Water propose to achieve a supply-demand balance it is not possible at this time to indicate whether the 2022 medium proposal is sustainable from a water resources perspective. This situation will be clarified in early 2023 when a new draft Water Resource Management Plan is published.</p> <p>2022 maximum is 13,700 homes more than 2021 medium+ (+31%) and higher still than the 2020 maximum proposals previously considered unsustainable. Hence the 2022 maximum proposal is not considered compatible with sustainable water resources management although this situation will be confirmed when the new draft Water Resource Management Plan is published which will explain future proposals for new imported resources and future management of aquifer abstractions.</p>	No	<p>Water resources constraints are considered more dependent on the quantum rather than the location of the development.</p> <p>Wastewater challenges exist in Cambourne area but conclusions do not vary between growth levels and existing infrastructure improvement plans can accommodate significant growth overall and be locally adapted to accommodate spatial alternatives.</p>
<i>Climate Change:</i> Zero Carbon	Yes - Quantitative assessment completed at strategic options stage.	<p>Modelling the updated growth levels would:</p> <ul style="list-style-type: none"> <li>cause an overall increase in the amount of carbon shown in our modelling, but this should not</li> </ul>	Yes	Remodelling the increased growth figures, without a change in distribution between spatial options would not result in a change to our conclusions.



Evidence theme/evidence base	Response to question a: Are there specific differences between conclusions for different 2020 SSO growth levels?	Response to question b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?	Response to question c: If yes to a and b, would this specific conclusion vary by spatial option?	Response to question c: comments
		<p>necessarily be seen as a reason to avoid the increased growth – because our tool is not able to account for carbon that occurs outside of Greater Cambridge even if caused by employment growth within Greater Cambridge. If Greater Cambridge artificially limits its own growth, this is likely to squeeze that growth into neighbouring areas and simply ‘hide’ that carbon rather than avoiding it. If that happens, there may actually be even higher carbon emissions in reality if this causes people to commute further or if the homes are built in an area that has worse standards than Greater Cambridge intends to have for net zero carbon buildings. It’s just that our tool would not capture this within Greater Cambridge’s carbon account.</p> <ul style="list-style-type: none"> <li>• Would give a fuller picture of the overall carbon emissions of the growth within Greater Cambridge, but this would only be useful if there are decisions to be made around the implications of addressing that carbon e.g. costs of an area-wide offsetting scheme for transport carbon and embodied carbon; justifying allocation of more sites for renewable electricity generation capacity; programs to more rapidly phase-out fossil fuel cars; etc.</li> </ul>		<p>However, if the significantly higher growth (especially in 2022 Medium scenario) results in a need to change the distribution of growth in the different spatial options – e.g. an additional new settlement or more village growth – then there is a chance that the conclusions might change.</p>

Evidence theme/evidence base	Response to question a: Are there specific differences between conclusions for different 2020 SSO growth levels?	Response to question b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?	Response to question c: If yes to a and b, would this specific conclusion vary by spatial option?	Response to question c: comments
<i>Green Spaces and Biodiversity: Green Infrastructure</i>	No - Qualitative assessments – conclusions identify unquantified increase in the same impacts in relation to the difference between growth levels.	Although the answer to question a is no, LUC consider this to be important commentary: The increase in growth level will exacerbate the effects identified in the previous assessments. However it is unlikely that an updated assessment would report significantly different conclusions in relation to the growth levels previously assessed (assuming the spatial distribution of homes remains as per the previous options).	Yes	The previous assessments present different findings for different spatial options. It is likely that the effects identified would be exacerbated under the higher growth levels. Whether or not a different conclusion would be reached depends on where the increased provision of homes would be provided – this certainly has the potential to result in different assessment findings.
<i>Wellbeing: Equalities</i>	No - No differentiation in conclusion between growth levels tested.  Planning for additional development to respond to development needs provides opportunities to address the needs of people with different protected characteristics, for example with different types of homes that are needed and a greater range of jobs. The First Proposals assessment highlighted positive impacts related to age, disability, pregnancy and maternity, race, and issues related to Cambridge being an unequal city and south Cambridgeshire's rurality issues. Additional development would need to be accompanied by community facilities, green spaces and other infrastructure, helping to create more balanced and sustainable communities including by improving access to services and facilities locally. This could also have positive impacts if these supporting needs are met. The extent of benefits and impacts would depend on the scale and location of development, and policies put in place to secure	N/A	N/A	N/A

Evidence theme/evidence base	Response to question a: Are there specific differences between conclusions for different 2020 SSO growth levels?	Response to question b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?	Response to question c: If yes to a and b, would this specific conclusion vary by spatial option?	Response to question c: comments
	supporting infrastructure and to avoid negative impacts.			
<i>Great Places: Landscape and Townscape</i>	Yes.  The qualitative assessment identifies an unquantified increase in impacts in relative terms of changes that may cause relatively greater harm to distinctive local landscape and townscape characteristics/features between the 2020 SSO minimum, medium and maximum growth levels.	It is unlikely that the updated 2022 minimum and maximum growth levels would make a significant material difference to the previous conclusions regarding these SSO growth levels when tested at a strategic level. However, it is likely that the updated 2022 medium growth level would make a significant material difference to the previous conclusion regarding this SSO growth level when tested at a strategic level, due to the substantially higher level of growth proposed.	No, with regards to the updated 2022 minimum and maximum growth levels.  Yes, with regards to the updated 2022 medium growth level.	N/A for minimum and maximum growth levels The substantially higher level of growth associated with the updated 2022 medium growth scenario is likely to result in changes that may cause greater harm to distinctive local landscape and townscape characteristics/features, depending on the spatial option. The additional growth is likely to increase the risk of significant conflict with policy for the medium growth scenario, and may change the conclusions on the relative performance of the different spatial options.
<i>Great Places: Heritage Impact Assessment</i>	No - Qualitative assessment – conclusions suggest unquantified increase in impacts in relation to the difference between growth levels.	In terms of the historic environment, the additional growth will most probably increase the risk of significant conflict with policy for the medium growth scenario.	Potentially	The significant changes to the medium growth level may have a material and significant effect on the conclusions on the different spatial options depending on how the additional growth is delivered within each spatial option.  We are unable to comment further, or make any assessment, without information on how the additional growth would be delivered under each of the different spatial options. However, we can say that the additional growth will most probably increase the risk of significant conflict with policy for the medium growth scenario; and may change our conclusions on the relative performance of the different spatial options.
<i>Jobs: Employment</i>	Yes - Employment projections were re-run to inform the 2022 housing growth levels, and overall jobs numbers have changed (increased for the medium level but decreased for	Comparing the minimum housing growth levels, the results are the same as the 2020 assessment as the 2022 minimum housing growth levels will not be sufficient to meet forecast employment requirements.	Yes	Conclusions relate to locations <i>per se</i> as best serving specific sector needs, and separately to whether growth levels would meet sector land requirements.

Evidence theme/evidence base	Response to question a: Are there specific differences between conclusions for different 2020 SSO growth levels?	Response to question b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?	Response to question c: If yes to a and b, would this specific conclusion vary by spatial option?	Response to question c: comments
	<p>maximum) from those included in the First Proposals.</p>	<p>For the medium level of growth, there has been a material increase in homes required to meet the medium jobs growth level, which is considered the most likely employment outcome. The revised medium level of homes would be required to meet the revised employment scenario.</p> <p>For the maximum level, there has been a more limited increase in the homes required and the 2020 assessment conclusions are likely to remain the same.</p> <p>There are other factors in the 2022 employment evidence that may influence the SSO assessment, in terms of recommendations for types of floorspace planning, which have increased, separate from the homes and jobs needs due to factors associated with property markets that are not directly influenced by homes and jobs.</p> <p>The standard method scenario in the 2022 employment evidence is equivalent to the jobs (and therefore homes) in the minimum scenario. Given the rate of jobs creation in the past, the standard method scenario would constrain job growth. The current level of floorspace commitments in the Greater Cambridge land supply and First Proposals allocations would provide enough offices and laboratories employment land to meet the needs generated under the standard method,</p>		

Evidence theme/evidence base	Response to question a: Are there specific differences between conclusions for different 2020 SSO growth levels?	Response to question b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?	Response to question c: If yes to a and b, would this specific conclusion vary by spatial option?	Response to question c: comments
		<p>however there is uncertainty regarding industrial and warehousing needs.</p> <p>The central scenario in the 2022 employment evidence is equivalent to the jobs (and therefore homes) in the medium growth scenario. Given the rate of job creation in the past, the 2022 employment evidence recognises this as the most likely outcome for the Greater Cambridge economy. The current level of floorspace commitments in the Greater Cambridge land supply and First Proposals allocations would provide enough offices and laboratories employment land to meet the needs generated under the central scenario, however there is uncertainty regarding industrial and warehousing needs.</p> <p>The higher scenario in the 2022 employment evidence is equivalent to the jobs (and therefore homes) in the maximum growth scenario. The current level of floorspace commitments in the Greater Cambridge land supply and First Proposals allocations would provide enough offices and laboratories employment land to meet the needs generated under the higher scenario, however there is uncertainty regarding industrial and warehousing needs.</p>		
<i>Homes</i> : Housing Delivery Study	Yes – SSO findings concluded that an annual housing requirement higher than the medium level may be achievable, but that maximum level is unlikely to be deliverable based on the	The 2022 minimum and maximum growth levels do not make a material difference to the previous conclusions on the 2020 minimum and maximum growth levels. The leap between the 2020 medium and 2021	Yes – the final spatial strategy and site selections will have a bearing on how quickly sites can be brought on	Most conclusions relate to locations per se, and separately to the deliverability of achieving the medium and maximum growth level. Considerations of whether a five year land supply can be delivered varies depending on

Evidence theme/evidence base	Response to question a: Are there specific differences between conclusions for different 2020 SSO growth levels?	Response to question b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?	Response to question c: If yes to a and b, would this specific conclusion vary by spatial option?	Response to question c: comments
	current policy framework and evidence for historical precedents.	medium+ to the latest 2022 medium growth level would make a material difference to previous conclusions regarding medium SSO growth levels.	stream and then how quickly they build out.	growth level and spatial option. The material increase in annual housing completions from the 2020 medium and 2021 medium+ to the 2022 medium will require significant new sources of supply over and above the additional allocations proposed in the First Proposals version of the Local Plan. Therefore additional testing of spatial options (baskets of sites) is required to estimate at what level the housing requirement becomes unachievable.
<i>Infrastructure:</i> Transport Evidence	Yes - Quantitative assessment completed at strategic options stage.	<p>The levels of growth suggested in the latest information are broadly within the range of growth already tested in the 2020 Spatial Option tests and therefore we are content that there will not be a significant impact on the ability of the transport network to accommodate the proposed growth. Given that the revised 'high growth scenario' is only relatively small increase in dwellings (1300-1400) above what was previously tested, this summation remains true.</p> <p>It possible that there may need to be additional mitigation both across the local plan area and on a site-by-site basis as a result of the higher levels of growth. It is also possible that the phasing of both development and mitigation would need to be revised to ensure the phasing of the higher level of development did not result in increased highway impacts before the planned mitigation is introduced.</p>	Yes	<p>The revised growth levels do not significantly change the conclusions made in relation to the Spatial Options tested in 2020 providing that the additional growth was located in line with the hierarchy of transport performance for development in different areas in line with the transport evidence report.</p> <p>The relative performance of the different development areas (edge of Cambridge/new settlement) is broadly consistent across the spatial options tested and therefore the conclusions are unlikely to change.</p> <p>Due to the range of development options tested to date and the conclusions these tests enabled us to arrive at, we have sufficient information to be able to draw conclusions on any updated options of this scale. Any final, agreed development scenario would be subject to a further test in order to be taken forward to the draft plan.</p>



Evidence theme/evidence base	Response to question a: Are there specific differences between conclusions for different 2020 SSO growth levels?	Response to question b. If yes to a, do the updated 2022 minimum, medium and maximum growth levels make a material difference to previous conclusions regarding SSO growth levels?	Response to question c: If yes to a and b, would this specific conclusion vary by spatial option?	Response to question c: comments
<p><i>Infrastructure:</i> Infrastructure</p>	<p>Yes - In our earlier studies, the first step was to assess the 'balance of homes to find'. This equals the total number of new homes minus the number of new homes already committed (i.e. with planning permission). Future infrastructure needs are driven by the 'balance to find', because the new homes already committed can be served by infrastructure capacity already existing or committed; otherwise those homes would not have been granted planning permission.</p> <p>The 2020 Spatial options Infrastructure Delivery Plan Spatial Options assessment, prepared by Stantec, identified the growth levels and calculated the balance to find.</p> <p>The report raised concerns about the ability of the maximum level of growth to achieve the required open space on site due to the density assumptions made (although this could be overcome by using more efficient forms of open space / sports provision) and water targets. The minimum and medium did not raise concerns.</p> <p>The Preferred Option tested in 2021 (referred to as Medium+) had a 'balance to find' of 12,000 homes 2020-41, but because the supply ran to 12,440, this higher figure was tested. That work considered whether this balance to find (higher than the 9,800 in the 2020 medium growth option) generated concerns beyond the medium option tested previously, and the answer was not materially.</p>	<p>Comparing the 2022 minimum growth option with the 2020 minimum, the new 2022 data generates a higher growth target, but only an additional 700 homes (including the buffer), and given the higher supply and additional delivery (faster delivery at Northstowe and Waterbeach), the balance to find under the minimal option is less than it was under the 2020 minimum scenario (2,300 homes compared to 3,900 homes), and thus the new data makes no material difference to our previously drawn conclusions.</p> <p>Comparing the 2022 <u>medium growth option</u> with the 2021 Medium+ Preferred Spatial Option, overall proposed growth in homes based on the new data is approximately 8,000 higher. Supply has increased by 800 and additional (faster) delivery is anticipated at Northstowe and Waterbeach, which increases committed supply by 2,300. However, the balance to find based on the new 2022 growth levels rises to 18,300 homes, an increase over the 2021 Medium+ of approximately 6,000 new homes, a rise of almost 50%. What is also apparent is that the balance to find for the medium growth option based on the current data, is in excess of the maximum tested in 2020, in respect of which we had raised concerns (17,700 homes vs the updated figure of 18,300). This is a specific and significant difference.</p>	<p>Yes</p>	<p><u>2022 minimum growth option: no.</u> Our previous conclusions still stand regardless of spatial option.</p> <p><u>2022 medium growth option: yes.</u> An additional 6,000 homes to find over and above the Medium+ preferred option is equivalent to three quarters of another fully built out NEC. Existing infrastructure capacity and future requirements vary by location and therefore the different spatial options will have different infrastructure requirements to deliver the additional homes.</p> <p><u>2022 maximum growth option: yes.</u> With the reduction in the number of homes delivered through faster growth from 8,600 to 1,500, the balance to find is 7,600 higher than previous, and this significant increase is likely to lead to different conclusions because to deliver the additional homes the different spatial options will have different infrastructure requirements.</p> <p>By adjusting housing density assumptions it may be possible to provide a higher proportion of the land area to meet the increased infrastructure requirement, but the scale and cost of that infrastructure requirement is directly related to the number of homes and population, and the new 2022 growth levels do increase this substantially.</p> <p>In our previous studies, we concluded that the maximum option of 17,700 'balance to find' homes would be difficult to accommodate in</p>

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		<p><u>Comparing the 2022 maximum growth option</u> with the 2020 maximum, the new data adds a further 1,300 homes to the maximum growth option, which is more than balanced by the higher supply and faster delivery of the existing committed new settlements. However, we understand that the 8,600 homes previously identified to be delivered in the plan period (the additional faster delivery referred to in above) has now been scaled back to the 1,500 homes identified in the table below, i.e. this means there is a further 7,100 homes to find in the plan period. On this basis the balance of homes to find under the maximum growth option increases substantially to 25,300 (up from 17,700), which will lead to specific differences in the conclusions now reached.</p> <p>Thus, at this stage without rerunning the assessment in full, we expect that the new medium and maximum growth levels will make a material difference to our previous conclusions. Indeed, given the new data (for both medium and maximum) raises the housing unit balance above the maximum tested previously (the 2020 level), it is highly likely that the additional housing would generate significant infrastructure needs over and above the maximum needs we estimated in earlier studies. The minimum growth option has a lower balance of homes to find than the earlier studies, and so does not make a material difference to previous conclusions.</p>		<p>terms of infrastructure provision. Considering the new 2022 data, including the increases in committed supply and faster delivery, the medium growth option represents a 50% increase on the 'balance to find' homes compared to the earlier medium, and is a higher figure than the earlier maximum, and the new maximum is 43% higher than the 2020 maximum. Therefore, both growth options are likely to be even more difficult to accommodate than the 2020 maximum, in respect of which we had concerns.</p> <p>In summary:</p> <ul style="list-style-type: none"> <li>- For the medium and maximum growth options the 2022 version will result in substantially higher infrastructure requirements, irrespective of spatial options (the location of growth). But the extent and nature of those requirements will vary by spatial option, because existing infrastructure capacity and future requirements vary by location.</li> <li>- For the minimum growth option, our previous conclusions still hold, irrespective of the spatial option chosen.</li> </ul>



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<p><i>Infrastructure:</i> Viability</p>	<p>Not substantively</p> <p>Our viability work is delivered through assessing the viability of 'typology sites' – effectively hypothetical sites typically categorised by type (greenfield/brownfield) and value zone. These do not take account of a cumulative number of housing across the local authority area. Therefore, the change in the number of units required in the Local Plan would be unlikely to influence the designation of typologies. We also carried out more detailed analysis of strategic sites – namely the North East Cambridge Area Action Plan, Cambridge East Airport, and Cambourne. If the number of units expected to be delivered within those strategic sites was to change, then it would have an impact on the viability, although given the high density of the modelling for the NECAAP site, we anticipate there would be limited capacity for additional units on the NECAAP site, and additional housing would have to go elsewhere in the area. Therefore again this would have no direct impact on how we set up and tested our work.</p>	<p>There are two circumstances where we think there may be an impact on our work:</p> <p>1) Infrastructure costs – we have received the commentary from IDP with regard to the impact on their IDP cost conclusions. This would have a knock-on impact on our viability work, as we used costs provided by Stantec as an input in our viability appraisals.</p> <p>a. In the 'Greater Cambridge Local Plan Report: First Proposals (Preferred Options)' dated Aug 2021, we did not have final infrastructure figures from Stantec, but we used a figure of £30,000 per unit based on the interim report.</p> <p>b. In the 'NECAAP Viability Assessment' dated Dec 2021, more detailed cost information was provided by Stantec, therefore an infrastructure figure of £28,187 per residential unit, and £216 per sqm for commercial development was applied.</p> <p>Therefore, any increase on those costs would have an impact on the viability outcomes. However, until we receive any figures from Stantec, we are unable to run any revised modelling to assess the level of impact it would have on the viability. Given the change in the economy over the last year – since when house prices have risen (and likely have peaked), build costs have continued to rise etc, it would be recommended that the full</p>	<p>Yes</p>	<p>Additional strategic sites - if in order to meet the higher need, the Councils identify any additional strategic sites to locate a large number of the units, then that may need to be specifically modelled individually as well.</p>

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		viability models are tested with all inputs updated, not just infrastructure.		
Habitats Regulations Assessment	No - To assess the impacts of a plan in relation to HRA, it is necessary to understand the broad locations of proposed growth. As such, our previous assessments have considered the impacts of each spatial option based on the primary location of growth until a more detailed assessment can be completed rather than looking at the impacts of the plan at each growth level over the plan period. Therefore, the re-running of the evidence testing of the strategic spatial options against a new growth level is not considered to result in materially different outcomes to our November 2020 and August 2021 conclusions.	N/A	Yes	Should there be changes to the spatial options, then an assessment would need to be conducted to determine the potential impacts of the plan against the new/changed spatial options.

## Conclusions

- 9 These conclusions seek to answer question d above: if yes to a and/or b and c, do we have sufficient information to make a conclusion about the impact of the updated 2022 growth scenarios, are we in the process of getting this, or is there a case that we should do substantive additional work to test these, and/or inform a comparative assessment of the previous 10 spatial options already assessed?
- 10 On the basis of the above:
- As shown in table 3, all evidence bases note that the significant difference between the 2022 medium and the previous 2020 medium and 2021 medium+ growth levels would result in material differences to conclusions made regarding those earlier growth levels. Evidence bases considered that difference between the 2022 minimum and the 2020 minimum was not material; most evidence bases with the exception of infrastructure and viability considered that the difference between the 2020 maximum and 2022 maximum was not material.
  - A synthesis of evidence base findings that provided an initial commentary on the likely impacts of the new 2022 medium growth level is presented in the main body of the Strategy topic paper: Development Strategy Update. Initial exploration of the growth levels has been completed in the Housing Delivery Study Addendum published alongside this topic paper. Further assessment of the impacts of the 2022 growth levels for water and housing delivery will be undertaken to inform the draft plan development strategy.
  - Noting the significant increase presented by the 2022 medium in relation to the 2020 and 2022 medium figures, all evidence bases stated that the location of that additional growth would have a material bearing on its impacts.
  - Informed by the responses from the various evidence base consultants in the table above, the Councils will explore and confirm the need or otherwise for any further strategic options testing, once we have confirmed a growth level that is deliverable in housing delivery and water supply terms, and once we have identified a distribution to meet this growth level.

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