CONSULTATION ON "EAST OF ENGLAND PLAN > 2031" AND CONSIDERATION OF JOINT CAMBRIDGESHIRE AUTHORITIES' RESPONSE

To: Cabinet

24 November 2009

From: Executive Director: Environment Services

Electoral division(s): All

Forward Plan ref: 2009/033 Key decision: Yes

Purpose To agree the joint response from Cambridgeshire County

Council, including the views of the Cambridgeshire District Councils, to be provided to the East of England Regional Assembly (EERA) on the review of the Regional Spatial Strategy (RSS) "East of England Plan > 2031"

Recommendation: That Cabinet:

(1) Approves Appendices 1 and 2 of this report as the basis of Cambridgeshire County Council's response to EERA

- (2) Approves the results of the consultation work undertaken by the Cambridgeshire authorities, as summarised in Appendix 5, for submission to EERA as evidence to inform the review of the East of England Plan
- (3) Delegates the Cabinet Member for Growth,
 Infrastructure and Strategic Planning in consultation
 with the Executive Director Environment Services to
 agree the final form of the response, to take account
 of comments from local authorities, other
 stakeholders and third parties

	Officer Contact:		Member contact
Name:	Mark Vigor	Name:	Cllr Roy Pegram
Post:	Head of Strategic Planning	Portfolio:	Growth, Infrastructure and Strategic
			Planning
Email:	Mark.Vigor@cambridgeshire.gov.uk	Email:	Roy.pegram@cambridgeshire.gov.uk
Tel:	01223 715542	Tel:	01223 699173

1. INTRODUCTION

- 1.1 The Regional Spatial Strategy (RSS) is known as "The East of England Plan" and was published in May 2008. The Plan sets out regional planning policy up to 2021. The East of England Regional Assembly (EERA) is undertaking a review of the Plan that will take the strategy to 2031.
- 1.2 EERA has undertaken initial work:
 - Preparing and consulting on a project plan for the RSS
 - Developing the evidence base to inform the review and commissioning technical studies
 - Preparing development scenarios and undertaking a Sustainability Appraisal and Strategic Environmental Assessment of the scenarios
- 1.3 Members will be aware that early work on the review required the Regional Assembly to seek the advice of the strategic planning authorities (including Cambridgeshire County Council) on a range of housing scenarios. This was reported to Cabinet in May 2009.
- 1.4 This report summarises the work that the Cambridgeshire authorities have completed so far in responding to the RSS review, sets the context for the review in Cambridgeshire, describes EERA's consultation and sets out proposed responses.
- 1.5 The County Council has worked in partnership with District Councils and Cambridgeshire Horizons to develop a joint strategic approach that will inform the RSS review. There is currently some uncertainty over the future of regional planning in England, but even if the current system of regional plans does not continue, it seems likely that some form of strategic overview would still be needed to co-ordinate the work of local authorities and other organisations across housing and economic sub-regions. Therefore it is considered that if a joint approach can be agreed this will strengthen the position of the Cambridgeshire authorities in the current East of England Plan review or within any amended process.

East of England Plan > 2031 – Scenarios for Housing and Economic Growth

- 1.6 The current stage of the East of England Plan review features public consultation on growth scenarios. Consultation opened on 2 September and runs for 12 weeks to 24 November. The consultation proposes a range of illustrative growth scenarios for the Region as summarised in Section 4 of this report.
- 1.7 Consultation materials can be found at:
 - http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/east-of-england-plan-review-to-2031/
- 1.8 The consultation sets out eight questions these are given in Appendix 1 along with proposed responses (in italics). As outlined below, it is intended

that draft comments will be provided by EERA's deadline, to be followed by more detailed amendments following discussion at a further meeting of the Joint Cambridgeshire Regional Spatial Strategy Review Panel (CReSSP) on 4 December.

East of England Plan > 2031 - Policy Update and Review

1.9 After the public consultation on growth scenarios began, the County Council was contacted by the Regional Assembly asking for advice on what changes, if any, are needed to the East of England Plan's Cambridge Sub-Region policies (CSR 1 to 4). The request for advice follows a different timescale to the public consultation and comments are requested by 9 December 2009. A suggested approach to a review of the CSR policies is set out in italics in Appendix 2, and the text of the existing policies is summarised for information in Appendix 3.

2 BACKGROUND TO THE DELIVERY OF THE CURRENT EAST OF ENGLAND PLAN

- 2.1 There is a long history of economic growth and housing development in Cambridgeshire. Between 1991 and 2006 it is estimated that the housing stock of the County grew by 20% from 205,300 to 247,000 a rate of 2,780 homes per annum.
- 2.2 The existing East of England Plan (May 2008) makes provision for a minimum of 58,000 additional homes between 2006 and 2021 in Cambridgeshire, which will take the County's housing stock to 305,000. This represents 23% growth in 15 years or **3,870 homes per annum**. East of England Plan policy H1 (Regional Housing Provision) states that these are minimum numbers to be provided.
- 2.3 The numbers of new homes actually completed from April 2006 to March 2009 averaged **3,575 per annum** and were at their lowest **2,813 per annum** in 2008/09, reflecting the initial impact of recession.

3 SUMMARY OF WORK UNDERTAKEN BY THE CAMBRIDGESHIRE AUTHORITIES

3.1 The Cambridgeshire authorities have undertaken a wide range of work in responding to the East of England Plan review and in raising the profile of the review with Cambridgeshire's residents, businesses and other stakeholders.

Joint Cambridgeshire RSS Review Panel (CReSSP)

3.2 The Cambridgeshire authorities' work on the RSS review has been overseen by a joint panel of Members from the County and District Councils, including representatives from Peterborough City Council and Cambridgeshire Horizons, known as the Joint Cambridgeshire RSS Review Panel (CReSSP). The first meeting of CReSSP was in November 2008 and the Panel has met regularly since then.

3.3 CReSSP supported a joint spatial planning vision for the future of Cambridgeshire to 2031 to guide work on the RSS review (given in Appendix 4). CReSSP also steered the work of the Cambridgeshire authorities on the Cambridgeshire Development Study and in developing advice given to the Regional Assembly in June 2009.

Cambridgeshire authorities' public consultation and communications work

- 3.4 A range of communications work was undertaken by the Cambridgeshire authorities leading to the submission of the advice to EERA in June 2009.
- 3.5 Since June, the authorities have undertaken further communications and consultation, aimed at raising the profile of the East of England Plan review and gathering the views of Cambridgeshire's residents and businesses, under the title "Future Cambridgeshire: Your County Your Choice". This is summarised in Appendix 5.
- 3.6 The majority of those who responded to this consultation considered that housing growth should be lower than any of the scenarios being consulted on by EERA. This is consistent with the previous advice provided to EERA by the Cambridgeshire authorities which indicated that a continuation of existing build rates is the maximum which could be delivered within Cambridgeshire by 2031.
- 3.7 Cambridgeshire residents and businesses expressed significant concerns about the inadequacy of infrastructure and did not generally support high levels of housing growth. However there was some support for further growth in the County, subject to adequate infrastructure being provided. There were also calls to develop a clearer vision for the future of Cambridgeshire that would enjoy widespread support from local authorities, businesses and other organisations across the County.

4 PUBLIC CONSULTATION – "EAST OF ENGLAND PLAN > 2031"

- 4.1 The Regional Assembly's public consultation is set out in the following documents:
 - East of England Plan > 2031 Scenarios for housing and economic growth
 - Sub-area Profile for Cambridgeshire
 - East of England RSS Review Integrated Sustainability Appraisal Interim Report

East of England Plan > 2031 – Scenarios for housing and economic growth

- 4.2 The main scenarios and consultation questions are set out in "East of England Plan > 2031 Scenarios for housing and economic growth".
- 4.3 This introduces the East of England Plan review and explains the reasons for reviewing the Plan at this time. The region's economy is still predicted to grow significantly over the next 20 years and its population is expected to rise from

- 5.7 million currently to nearly 7 million by 2031. The consultation argues that, despite the recession and likely changes to the planning system, the evidence and policies established by the review will still be needed to guide this growth. The review will cover the Plan period from 2011 to 2031.
- 4.4 The consultation sets out four scenarios for consultation (described in more detail below). It is stressed that it is difficult to predict what might happen in the future and that none of the scenarios necessarily give the 'right' answer. Housing figures are given for each district and strategic authority, although the consultation states that these are intended as a guide, and that further work will be needed, following public consultation, before writing the revised Plan. (Scenarios for Cambridgeshire are given below and also in Appendix 7 which includes figures for other strategic authorities for comparison)
- 4.5 The likely impacts of these scenarios on a range of social, economic and environmental factors are then outlined (summarising the findings of the Integrated Sustainability Appraisal). The consultation highlights the Assembly's concern that even the delivery of the current Plan cannot be achieved without Government commitments to infrastructure investment, both to redress current deficits and support new growth.
- 4.6 In addition to the policy setting out future housing growth, the Assembly is also considering whether other parts of the Plan need updating. The consultation focuses on the Plan's vision and objectives and policies that may need to be reviewed. The document then sets out eight consultation questions (given with proposed responses in Appendix 1).

Scenario 1: "Roll forward" of existing Plan

- 4.7 Scenario 1 is broadly based on the views of local councils in the region most indicated that a "roll forward" of current Plan rates for another ten years was the highest level of development that could be accommodated.
- 4.8 For Cambridgeshire this would be equivalent to 3,610 dwellings a year or 72,160 over the period 2011 to 2031. Most growth would be provided in the south of the County (some 60% in Cambridge City and South Cambridgeshire), although the levels of growth in these districts have been reduced slightly from a straightforward extension of the current strategy to recognise the concerns expressed by the Cambridgeshire authorities in the advice of June 2009.

SCENARIO 1	Annual average	20 year target		
Cambridge City	960	19,200		
East Cambridgeshire	390	7,760		
Fenland	530	10,520		
Huntingdonshire	550	11,080		
South Cambridgeshire	1,180	23,600		
Cambridgeshire	3,610	72,160		

4.9 EERA's assessment of impacts highlights that this scenario, with the lowest amount of new housing, would have the least impact on affordability. It could also fail to fully capture economic benefits. However, the scenario could help to reduce carbon emissions from transport, if adequate alternatives to the car were provided.

Scenario 2: National housing advice and regional new settlements

- 4.10 Scenario 2 is one of those required to test advice given to Government by the National Housing and Planning Advice Unit (NHPAU). This advice suggests growth in the range of 30,000 to 40,000 new homes a year would be needed in the region to stabilise long-term rises in house prices.
- 4.11 For Cambridgeshire, this would equate to 4,560 dwellings a year or 91,160 over the plan period. Under this scenario, most of the increase on the first scenario would be met in Huntingdonshire, which would contribute some 26% of the Cambridgeshire housing total. This follows the Regional Scale Settlement Study's findings that there is potential for a new settlement at Alconbury it is suggested that this could contribute 13,000 new homes within the Plan period and grow to 20,000 homes beyond 2031. South Cambridgeshire and Cambridge City would also contribute increased numbers to the total, reflecting that, under the existing strategy, a substantial amount of development has been delivered in these districts.

SCENARIO 2	Annual average	■ 20 year target		
Cambridge City	1,110	22,200		
East Cambridgeshire	390	7,760		
Fenland	530	10,520		
Huntingdonshire	1,200	24,080		
South Cambridgeshire	1,330	26,600		
Cambridgeshire	4,560	91,160		

4.12 EERA's analysis highlights that this scenario – through the establishment of major new settlements - could draw resources and investment from existing towns and increase road traffic, particularly during the early development of the new settlements. Additional growth in Cambridge may also have impacts on the historic centre of the City. It is also acknowledged that this scenario would have impacts on local landscapes.

Scenario 3: National housing advice and regional economic forecasts

4.13 Scenario 3 is governed by the economic potential to create more jobs. Extra housing growth is distributed to areas where there is forecast to be demand for additional workers. In areas where the economy is not predicted to grow as fast, housing levels have been maintained at the "roll forward" rates on the basis that intervention in the local economy will allow housing growth to at least these rates without encouraging increased commuting from the areas.

4.14 For Cambridgeshire this would produce a level of growth identical to scenario 2 of 4,560 dwellings a year or 91,180 over the plan period. Proportionally this scenario would lead to increased provision in Cambridge City, East Cambridgeshire and Huntingdonshire compared to Scenario 1, with provision being largely unaltered from the "roll forward" in Fenland and South Cambridgeshire.

SCENARIO 3	Annual average	20 year target		
Cambridge City	1,320	26,420		
East Cambridgeshire	620	12,360		
Fenland	530	10,520		
Huntingdonshire	900	17,960		
South Cambridgeshire	1,200	23,920		
Cambridgeshire	4,560	91,180		

4.15 The consultation argues that this scenario would be most likely to support economic growth, but - by focusing on existing areas of success - would not support economic diversification. The consultation also highlights that this option would be likely to lead to the greatest impacts on the historic core and landscape setting of Cambridge.

Scenario 4: National household projections

- 4.16 Scenario 4 takes both the scale and distribution of growth from Government projections of new households. The consultation highlights that these projections are significantly influenced by past rates of migration which may not be replicated in the future these have tended to be away from centres of economic activity to more economically remote rural and coastal areas. Nevertheless it is argued that these figures have been used by previous panels in the testing of regional plans and it is important that the implications of this scenario are understood.
- 4.17 For Cambridgeshire this would produce a requirement for 4,350 dwellings a year or 87,000 over the plan period. Compared to Scenario 1, Cambridge City and South Cambridgeshire would provide less housing, with the majority of growth (some 63%) being provided in East Cambridgeshire, Fenland and Huntingdonshire. Under this scenario Huntingdonshire would provide a similar level of growth to that suggested under scenario 2, with the development of a Regional Scale Settlement.

SCENARIO 4	Annual average	■ 20 year target		
Cambridge City	650	13,000		
East Cambridgeshire	750	15,000		
Fenland	800	16,000		
Huntingdonshire	1,200	24,000		
South Cambridgeshire	950	19,000		
Cambridgeshire	4,350	87,000		

4.18 EERA's assessment highlights that this scenario is likely to lead to greater volume and distance of travel by car. This distribution would be more likely to tackle localised housing need, although the viability of developments in some areas may limit the level of affordable housing that can be provided. It is argued that this scenario would also bring about regeneration in more remote towns, such as Wisbech. However, this more dispersed pattern of development could make it more difficult to manage waste close to its source and, the assessment argues, could also have a detrimental impact on market towns.

Cambridgeshire Sub-area Profile

- 4.19 The sub-area profile for Cambridgeshire describes the County and sets out what the four scenarios would mean for growth in the area. The Cambridgeshire authorities' advice is also summarised. In addition, the profile gives baseline information on air quality, biodiversity, flood risk, deprivation, health, employment, housing, the historic environment, landscape and other topics.
- 4.20 The profile highlights that, if recent trends continue, Cambridgeshire's population will be 789,000 by 2031, an increase of 25% on the 2006 population. However, the great majority of this increase (70%) is due to people moving into the area, and the consultation recognises that future migration patterns are much more difficult to predict than natural population changes. EERA's economic projections suggest that job growth within Cambridgeshire could be 104,100 over the Plan period (some 5,200 new jobs a year between 2011 and 2031). This would be an increase of 33% well above the projected regional average of 18%.
- 4.21 It should be noted that the sub-area profile lists the 'call for proposals' sites in the format given to EERA in the Cambridgeshire authorities' advice (under the headings "with potential", "serious difficulties identified" and "no longer worthy of consideration"). Below the list of sites, the profile states: "The Assembly accepts the [Cambridgeshire authorities'] views on the proposals, including that Mereham is not worthy of further consideration". The sub-area profile also refers to another developer proposal, at Six Mile Bottom in East Cambridgeshire, and states that the authorities did not give any views on this proposal this issue is dealt with in the proposed response set out in Appendix 1, paragraph 7.2.

Integrated Sustainability Appraisal – Interim Report

4.22 The Integrated Sustainability Appraisal Interim Report sets out likely impacts of the scenarios at the regional level. More detailed effects are then given for each of the sub-areas. These have been summarised with the consideration of the scenarios above.

5 CONSIDERATION OF DRAFT RESPONSES TO "EAST OF ENGLAND PLAN > 2031" CONSULTATION

5.1 Early drafts of the proposed Cambridgeshire responses, as set out in Appendices 1 and 2, were considered by Growth and Environment Policy Development Group (11 November) and CReSSP (13 November).

Growth and Environment Policy Development Group (PDG)

- 5.2 PDG broadly supported the draft responses. The paper prompted a wideranging discussion and a number of points were made:
 - There was general concern over the growth scenarios put forward for consultation by the Regional Assembly.
 - It was pointed out that the current recession would lead to a skills shortage and lack of capacity in the construction industry that would be likely to last for a long time.
 - The planning system results in each region being considered in isolation which does little to counter inequalities between them. With improved rail links there should be opportunities to spread the benefits of growth throughout the country, rather than providing for a disproportionate amount of development in the south and east of England.
 - High growth rates for the Cambridge area risk destroying the City's historic character and setting and will lead to increased congestion within the City centre.
 - There is a need to deliver the current strategy and to focus on the low carbon economy and green industries.
 - Transport infrastructure will be crucial. Some scepticism was expressed about whether new developments predicated on high levels of public transport use will in practice lead to a shift away from the car.
 - The review of the Plan offers the opportunity to spread the "Cambridge phenomenon" to the north of the county. Fenland has historically delivered high rates of growth and this growth will be needed if sites in the Cambridge area don't come forward as anticipated.
 - There may be a role for new settlements in any future strategy for Cambridgeshire, especially as delivery of the current strategy appears problematic.
 - The context to development in the County is changing rapidly any response to the Regional Assembly needs to state that it represents the Cambridgeshire authorities' views based on the best available evidence at the present time.

Joint Cambridgeshire Regional Spatial Strategy Review Panel (CReSSP)

- 5.3 A draft response was considered by CReSSP on 13 November. The discussion at the meeting included the following points:
 - There is a need to make it clear that the proposal for Six Mile Bottom, East Cambridgeshire is not considered valid, given that it was submitted around six months after the Regional Assembly's deadline and there is no Sustainability Appraisal for the proposal
 - There is a need to provide reference to supporting information, such as the Quality Charter for Growth and Strategic Housing Market Assessment
 - There is a need for much greater realism in the jobs forecasts. Support
 was expressed for narrowing the gap between the very high projections
 used by EERA and the much more cautious projections in the
 Cambridgeshire Development Study
 - In relation to the Cambridge Sub-Region (CSR) policies it was considered that there is a need to:
 - Highlight adaption to and mitigation of climate change in the policies
 - Include reference in policy CSR4 (Transport Infrastructure) to saved Structure Plan policy P8/10 on Transport Investment Priorities.
- 5.4 In general CReSSP supported the draft put forward at the meeting, subject to clarification of certain paragraphs particularly around Green Belt review and stronger wording in support of a lower level of growth and the increased carbon emissions associated with new settlements. Appendices 1 and 2 reflect CReSSP's recommendations.
- 5.5 As outlined earlier in this report, it is considered that there is advantage in developing a coherent strategy for the County including a preferred approach to the distribution of housing growth in response to the Regional Assembly's consultation. To advance this, County Council officers put forward a suggested approach to CReSSP with housing figures set out at District level. This was based on the previous work of the authorities and the findings of the Cambridgeshire Development Study (the suggested figures are given in Appendix 6).
- There was general support for the proposed housing distribution. However, Fenland representatives argued that a higher rate of growth for Fenland than that put forward in Appendix 6 would be within the District's capacity and would be consistent with the need to regenerate the market towns and achieve a balance of housing and job growth. Rates of out-commuting from the district were lower than elsewhere. Others expressed concern at current levels of commuting, for example between Fenland and Huntingdonshire. The sustainability of higher rates of growth in the north of the County, without assurances on employment growth and regeneration within the market towns, was also questioned. Nevertheless, it was suggested that there should be flexibility to find an agreed approach for Fenland. It was therefore agreed that further discussion would be undertaken to try to achieve this.
- 5.7 A possible approach would be to increase the preferred rate for Fenland District from 500 to 550 new homes a year, subject to strong caveats concerning economic regeneration and appropriate infrastructure. There may

be potential for higher numbers for Fenland (up to 650 new homes a year) dependent on further significant improvements to the local economy and the capacity of the market towns. There is also a need to improve rail and other public transport links, and particularly improve connections between Fenland and Peterborough to help facilitate this approach

- 5.8 A further meeting of CReSSP was agreed to be held on 4th December, where it is hoped a joint response can be endorsed by all the authorities.
- 5.9 The recommendations of Cabinet on 24 November will provide the basis for any final drafting. Recommendation (3) of this report seeks delegation of the final form of the response to the Cabinet Member for Growth, Infrastructure and Strategic Planning in consultation with the Executive Director Environment Services. It is suggested that a draft response be submitted by the deadline of 24 November, supplemented by further detail agreed on 4 December.
- 5.10 The proposed response to the consultation is given in Appendix 1. This states that the foundation of the approach for Cambridgeshire is based on the delivery of the current strategy of 75,000 new homes (equivalent to 3,000 new homes a year over the period 2011 to 2031). However, there may be potential to deliver up to an additional 15,000 new homes overall (equivalent to 3,600 new homes a year over the Plan period).
- 5.11 The response emphasises that the focus should be on successfully implementing the existing strategy and that the higher rates of growth put forward in scenarios 2, 3 and 4 are unsustainable and undeliverable. The need for the provision of adequate infrastructure is stressed and the Regional Assembly's projections for job growth are strongly questioned.
- 5.12 As outlined above, work has been undertaken to establish a preferred distribution of growth by District. If this can be agreed it is proposed that this be put forward to EERA to accompany the response given in Appendix 1. The suggested approach that was put forward to CReSSP on 13 November is given in Appendix 6. As outlined, it is proposed that the figure for Fenland in Appendix 6 be increased to 550 new homes a year, with potential for up to 650, dependent on the qualifications given in paragraph 5.7 above.

6 REQUEST FOR ADVICE – "EAST OF ENGLAND PLAN > 2031 POLICY UPDATE AND REVIEW"

- 6.1 After the public consultation on growth scenarios began, the County Council was contacted by the Regional Assembly asking for advice on what updates, if any, are needed to the East of England Plan's existing Cambridge Sub-Region policies. This request follows a different timescale to the public consultation outlined above and comments are invited by 9 December.
- 6.2 The East of England Plan contains four Cambridge Sub-Regional policies (CSR 1-4) as summarised in Appendix 3. The Cambridge Sub-Region is defined as "Cambridge and the surrounding area as far as and including the

market towns of Chatteris, Ely, Haverhill, Huntingdon, Newmarket, Royston, St Neots, St Ives and Saffron Walden".

Proposed approach on Cambridge Sub-Regional Policies

- 6.3 A proposed approach to the request for advice in reviewing policies CSR 1 to 4 is given in Appendix 2. It is suggested that the geographical coverage of these policies be expanded to cover the whole of Cambridgeshire. Additional policy advice should be developed to recognise the needs of different parts of the county, such as the need for enhancement and economic regeneration of the County's market towns.
- 6.4 Policy CSR4 on transport infrastructure contains little that is specific to the Cambridge Sub-Region. It is suggested that this could be developed to set out the basis of a transport strategy for Cambridgeshire as a whole, building on the relevant saved policy of the Cambridgeshire and Peterborough Structure Plan, while also recognising the need to reduce carbon emissions and mitigate and adapt to the impacts of climate change.

7 CONCLUSIONS

- 7.1 This report has outlined the work of the Cambridgeshire authorities in responding to the East of England Plan review and the Regional Assembly's public consultation and request for advice. It has also set out a proposed response that it is suggested be submitted to EERA from the Cambridgeshire authorities (Appendices 1 and 2). It is possible that a preferred strategy setting out growth to District level can be agreed between the authorities, and, if this proves to be the case, it is suggested that this also be submitted to the Regional Assembly to add detail to and strengthen the response.
- 7.2 The response has recommended that a lower rate of growth than scenario 1 is appropriate for Cambridgeshire, with some flexibility to provide further development should this be appropriate. The response has also highlighted that the strategy needs to be deliverable and that in a climate of recession in the development industry and severe constraints on public spending the provision of infrastructure to support growth will be an increasing constraint.
- 7.3 Although there will be changes to governance at the regional level in the near future and there may also be changes to the current regional planning system, it is nevertheless considered essential that the Cambridgeshire authorities develop a robust strategy for the future development of the County so that they are best placed to lead the debate and more effectively influence any new arrangements that may emerge.

8 SIGNIFICANT IMPLICATIONS

Resources and Performance

8.1 The resources and performance implications of the broad growth scenarios considered in this report are difficult to quantify with any certainty. In general, the higher levels of growth set out in the consultation have significant implications for resources, should they be carried forward in the draft Plan and endorsed by Government. Higher levels of growth would lead to increased demands for services and infrastructure in a climate of recession and reduced public spending. This has been highlighted in the proposed response set out in Appendix 1.

Climate Change

- 8.2 The climate change implications of the broad growth scenarios considered in this report are difficult to quantify with any certainty. The Cambridgeshire Development Study indicated that a growth strategy centred around Cambridge would be likely to lead to the lowest increases in carbon emissions, followed by a market towns strategy, with a strategy based around new settlements generating the most emissions.
- 8.3 In terms of other environmental impacts, increased growth around Cambridge (scenarios 1, 2 and 3) is most likely to affect the historic character of the City and its landscape setting.
- 8.4 As outlined in the response given in Appendix 1, there has been little consideration of flood risk in the East of England Plan review's Sustainability Appraisal, other than in coastal locations. In general scenario 4, which would concentrate growth in the north of the County, is most likely to lead to increased risk of flooding; however, development could be used to secure improvements to flood defences for existing communities at risk.

Access and Inclusion

- 8.5 The implications for access and inclusion of the broad growth scenarios considered in this report are difficult to quantify with any certainty. Those scenarios which concentrate development in the Cambridge area (scenarios 1 to 3) are likely to do most to capture the benefits of this location as a driver for the regional and national economy; however, this could be at the expense of wider economic diversification.
- 8.6 Scenario 4, which would promote more growth to the north of Cambridgeshire, could stimulate the economic and physical regeneration of more deprived parts of the County; however, without economic growth in these areas, it could lead to increased out commuting to more prosperous areas, with resultant impacts on infrastructure capacity and carbon emissions.
- 8.7 In general higher levels of housing growth are likely to lead to more provision of affordable housing through the planning process. Whether the higher growth levels put forward in scenarios 2, 3 and 4 would be sufficient to stabilise growth in house prices is uncertain; this is recognised by the

Regional Assembly, but EERA is nevertheless required by Government to consider these levels.

Statutory Duties and Partnership Working

- 8.8 Cambridgeshire County Council has undertaken a wide range of partnership work in responding to the East of England Plan review with the Cambridgeshire Districts, Cambridgeshire Horizons and Peterborough City Council; this is outlined in section 3 above.
- 8.9 At the time of submitting the joint Cambridgeshire authorities' response in June 2009, the County Council had a statutory duty under Sections 4(4) and 5(5) of the 2004 Planning and Compulsory Purchase Act to provide advice to the Regional Assembly. Under the Local Democracy, Economic Development and Construction Bill, which has recently received Royal Assent, this statutory duty would be removed, and it remains to be seen what regional planning role the County Council would have in the future. This issue has been considered by Cabinet as part of previous consultations most recently on 20 October 2009, when examining the Government's 'Policy Statement on Regional Strategies and Guidance on the Establishment of Leaders' Boards'.

Engagement and Consultation

8.10 The County Council is responding to a consultation by the East of England Regional Assembly. The Cambridgeshire authorities have also undertaken a wide range of engagement and consultation work to raise awareness of the Plan review and encourage people to make their views known; this is summarised in Appendix 5.

9 NEXT STEPS

- 9.1 Following Cabinet on 24 November, further work will be undertaken to see if a distribution of housing growth by District can be agreed, for discussion at CReSSP on 4 December. Recommendation (3) of this report seeks approval for the final submission of the response to be agreed by the Cabinet Member for Growth, Infrastructure and Strategic Planning in consultation with the Executive Director Environment Services. It is suggested that a draft response be submitted by the deadline of 24 November, supplemented by further detail agreed on 4 December.
- 9.2 After the close of the consultation, the Regional Assembly will analyse the responses it has received. A request has been made to the County Council and other strategic planning authorities for assistance in inputting and analysing the consultation comments, and it is intended that the County Council will support EERA in this work as fully as resources allow.
- 9.3 Following this, EERA will produce a draft East of England Plan, which the new Responsible Regional Authority (local authority Leaders' Board and East of England Development Agency) will put out for public consultation in April 2010.

9.4 It is envisaged that an Examination in Public into the draft Plan will be held by independent Inspectors in summer 2010, followed by public consultation on the Government's Proposed Changes to the Plan towards the end of next year. Final publication of the Plan is scheduled for 2011.

Source Documents	Location
East of England Plan > 2031 – Scenarios for housing and economic growth Cambridgeshire Sub-area Profile Peterborough Sub-area Profile East of England RSS Review – Integrated Sustainability Appraisal – Interim Report Brief for Review of Cambridge Sub-Regional policies and covering letter from EERA (September 2009) Section 4/4 and 5/5 Advice on the Review of the East of England Plan (June 2009) Cambridgeshire Development Study (July 2009) East of England Plan (May 2008) CReSSP reports for 9 January 2009 CReSSP reports for 6 March 2009 CReSSP reports for 7 April 2009 CReSSP reports for 15 July 2009	2 nd Floor, Castle Court, Shire Hall, Cambridge

<u>APPENDIX 1: PROPOSED RESPONSE TO EERA CONSULTATION "EAST OF</u> ENGLAND PLAN > 2031 – SCENARIOS FOR HOUSING AND ECONOMIC GROWTH"

Question 1: Do you think we've chosen the right growth scenarios to consider? If not, what other scenario(s) should we consider and why?

- 1.1 The Cambridgeshire authorities have high aspirations for the future of the County that already include provision for significant levels of housing demand and seek to support the continued expansion of the Cambridge high-tech economy in a way that will contribute to regional and national prosperity.
- The authorities' vision to 2031 is for Cambridgeshire to become an exemplar of low carbon living, enhancing its strengths in knowledge-based business and research, while offering increased opportunities through diversification into manufacturing and low carbon technologies. The location of new development will be used to create a closer relationship between homes, jobs and services, assisted by improved facilities for public transport, cycling and walking. The County's historic environment and landscapes will be preserved and enhanced. New development will create homes to address housing need and create new employment opportunities, recognising the County's unique character and adapting to the effects of climate change. This development will follow the principles of the Cambridgeshire Quality Charter for Growth which aims to secure the highest possible quality of development and is based on considerable stakeholder consultation and participation. It is considered that the high level housing scenarios in the current consultation are based on theoretical numerical projections rather than on a vision of the nature of growth and change to which the region and its constituent parts should aspire.
- 1.3 The Cambridgeshire authorities see the current strategy as indicating the core element of our requirements until 2031. It includes 75,000 new homes (3,000 a year over the period 2011 to 2031) to be provided in highly sustainable communities which will cater for the majority of any demands for growth likely to materialise before 2031.
- 1.4 However, the scale of growth in the current strategy is highly challenging in its own right, especially taking into account doubts over the deliverability of infrastructure essential to support large-scale growth in future years and about the speed of economic recovery. We are concerned that the main emphasis of the scenarios for consultation is placed on additional housing numbers at the end of the plan period when the main challenge is to deliver sustainable communities in the more immediate future which contain a mix of homes, jobs, facilities and services that are financially viable to develop and respond adequately to the challenges of climate change and the social needs of the County. The Strategic Housing Market Assessment for the Cambridge Sub-Region provides evidence which is supporting this work.
- 1.5 All four scenarios are based on substantial growth. Scenario 1, 'Roll forward of the existing Plan', takes current levels of growth and projects them forward for another 10 years; this is from the base of the existing Plan which itself provides for an increase in house building rates of nearly 40% on previous levels. The other scenarios present levels of growth even greater than this.
- 1.6 The Cambridgeshire authorities consider that, to provide an option that is truly realistic, deliverable and sustainable, **a lower growth scenario** must be

included, taking existing Plan commitments forward for the period to 2031. This lower growth scenario would:

- Reflect likely impacts of slow recovery from the current economic recession and a long period before housebuilding rates return to the levels seen in recent years; these levels themselves being slightly below the planned rates in the current strategy.
- Take into account severe constraints on public spending and the resulting lack of funding to secure new infrastructure.
- Provide a realistic alternative against which to test the likely impacts of continuing high growth rates in the other options (e.g. quality of life, mitigation of and adaption to the effects of climate change etc.).

Question 2: Do you have any comments on the four growth scenarios?

Scenario 1: Roll forward of existing Plan

- 2.1 As outlined above, the Cambridgeshire authorities consider that a lower growth option should be included. It is considered that 3,600 new homes a year is the maximum deliverable rate for the County over the Plan period. This is approximately equivalent to the rate of growth set out in scenario 1. However, the achievability of this rate of growth is qualified by a number of considerations set out below.
- 2.2 The level of growth put forward in scenario 1 will still require considerable infrastructure provision it cannot be assumed that there will be sufficient capacity to deliver a 'roll forward' of existing Plan rates of growth for another 10 years. The statement in the Integrated Sustainability Appraisal that Cambridge enjoys "good and improving transport links" (Integrated Sustainability Appraisal, paragraph 3.1.4), for example, needs to be qualified by recognising that these infrastructure improvements are needed to deliver the current strategy up to 2021 and will not necessarily release spare capacity for future growth beyond this date.
- 2.3 Given this uncertainty, the authorities will undertake a transport review to identify:
 - The extent to which the transport capacity of the City is a constraint to the long term growth of Cambridge
 - The transport measures which may be used to overcome identified constraints.
 - To the extent that any deliverable transport measures are identified, the potential scale and direction of future development up to 2031 and beyond, with particular reference to transport issues.

It is intended that this transport review will inform the authorities' future input into the East of England Plan review and will be overseen by the Joint Transport Forum.

- 2.4 In addition, the level of growth set out in scenario 1 and the higher growth scenarios would imply the need to review the Cambridge Green Belt before the end of the Plan period (2031). A review of the Cambridge Green Belt arising from the 2003 Cambridgeshire and Peterborough Structure Plan is only now being incorporated into authorities' Local Development Documents. The review has been thorough and comprehensive and has led to the release of those areas which can be developed with least harm to the purposes of the Green Belt, and additionally at North-West Cambridge, where justified by the exceptional needs of Cambridge University. Other proposed Green Belt releases have been rejected by recent studies and by Inspectors' Reports at public examinations.
- 2.5 Therefore review of the Green Belt would be held in reserve until such time as the need for the review is confirmed and currently planned developments are well advanced. Moreover, it cannot be assumed that a review would be able to identify significant additional land for development.
 - Scenario 2: National housing advice and regional new settlements
 Scenario 3: National housing advice and regional economic forecasts
 Scenario 4: National household projections
- 2.6 As outlined, the Cambridgeshire authorities consider that there are significant constraints that would need to be addressed to deliver the 'roll forward' of existing rates of growth under scenario 1. Given this, the authorities consider that the higher rates of growth outlined in scenarios 2, 3 and 4 are totally inappropriate: these would be beyond the capacity of the County and not deliverable in practice. Over-provision of housing risks creating unsustainable commuting patterns, a slow-down in the delivery of the current strategy, as well as impacting on the capacity of service and infrastructure providers to serve new development.
- 2.7 Key factors regarding scenarios 2, 3 and 4 are highlighted below.

Housing delivery

2.8 In terms of recent housing delivery, Cambridgeshire has averaged some 3,300 new dwellings a year over the period 2001 to 2009. Over the last year (April 2008 to March 2009) – with the impacts of the recession beginning to be reflected in construction activity – just over 2,800 new homes were completed and only 1,650 new homes were started. It is considered that growth rates of 4,300 to 4,500 new homes a year (scenarios 2 to 4) are totally unrealistic. These rates would require sustained development over 20 years at a considerably higher level than that achieved over the last few years – a boom period for the house building industry.

Economic assumptions

2.9 The Cambridgeshire authorities have significant concerns about the economic assumptions underlying the higher growth scenarios. According to the Sub-Area Profile, economic projections suggest that Cambridgeshire could expect baseline jobs growth of 104,100 over the plan period, or some 5,200 new jobs a year between 2011 and 2031, compared to an assumption of 3,750 a year in the current Plan to 2021.

- 2.10 While the most recent modelling work for the Plan review by Oxford Economics, shows lower increases in employment (and the linked workplace population) than earlier modelling for the region as a whole, the forecasts for Cambridgeshire have reduced by a significantly smaller percentage than for the region. As a consequence Cambridgeshire appears to account for a 30% share of the region's total employment growth over the period 2007 to 2031.
- 2.11 In contrast to this forecast, modelling undertaken by Cambridge Econometrics on behalf of the Cambridgeshire authorities indicates that fewer than 2,000 new jobs could be created a year up to 2031, and this forecast suggest that Cambridgeshire would account for a smaller share of regional employment growth over this period than that suggested by Oxford Economics.
- 2.12 The Cambridgeshire authorities consider that the level of job growth set out in the Sub-Area Profile of more than 5,000 new jobs a year is completely unrealistic. The assumptions underlying this forecast need to be carefully examined when the modelling is revisited as part of the Plan review in the autumn. The authorities are currently discussing this issue with the East of England Development Agency to achieve a more realistic forecasting base.
- 2.13 Our understanding is that Oxford Economics are producing further forecasts which will reduce projected job creation in Cambridgeshire. Around 4,000 jobs per annum might be a sensible upper limit for planning purposes. Further consideration of the Cambridgeshire forecasting methodology indicates that 2,500 jobs per annum could be regarded as the bottom end of the planning range. Given the current level of uncertainty over economic prospects, it may not be possible to narrow the range any further at this stage. Close monitoring and review will be essential. The preparation of Local Economic Assessments in 2010 should assist in this process.

Infrastructure constraints

2.14 As noted above, while some infrastructure improvements are being delivered, these are needed to meet the growth set out in the current strategy. There is an estimated transport infrastructure requirement of some £2 billion to serve the current strategy. The overall infrastructure requirement for Cambridgeshire is around £6 billion, based on Cambridgeshire Horizons' estimate at 2007. This highlights the need to address the impacts of the current strategy before further growth is planned. These problems will increase at higher levels of growth to the extent that the rate of growth envisaged by scenario 1 is considered to be the maximum achievable. The current economic downturn and severe constraints on public spending will make higher levels of growth undeliverable.

Environmental capacity

2.15 Further consideration is given under the response to Integrated Sustainability Appraisal at Question 8 below.

Green Belt

2.16 As outlined in paragraphs 2.4 to 2.5, it cannot be assumed that the Cambridge Green Belt contains significant additional potential that would meet the

requirements for development set out in scenario 1. Scenarios 2 and 3 would require additional development in the Cambridge area beyond this rate of growth, with the need to find even greater capacity in the Green Belt.

New settlements

- 2.17 Scenario 2 includes the creation of a new settlement at Alconbury in Huntingdonshire of 13,000 new homes in the Plan period to 2031, and up to 20,000 over the following years. Additional growth is also directed to Cambridge City and South Cambridgeshire under this scenario.
- 2.18 The Cambridgeshire authorities believe that there are significant flaws in the Arup Regional Scale Settlement Study, the evidence base supporting this scenario. There is little justification for the need for regional scale settlements or for the choice of locations selected. In addition, the capacity of these areas to accommodate this scale of growth is not adequately considered. There are also likely to be considerable impacts on the delivery of the existing strategy and on regeneration of the Huntingdonshire market towns and Peterborough.
- 2.19 The Cambridgeshire Development Study identifies the creation of new settlements as generating the highest carbon emissions of all the options modelled; the Integrated Sustainability Appraisal also highlights that a new settlement at Alconbury would be likely to result in significant commuting by car to Cambridge. There would also be significant additional costs associated with infrastructure provision arising from this scenario.

Question 3: What is your preferred growth scenario and why?

- 3.1 Given the above, the preferred growth scenario is based on the delivery of the current strategy of 75,000 new homes (3,000 a year over the period 2011 to 2031) which will cater for the majority of any demands for growth likely to materialise before 2031 and help realise the vision outlined at Section 1.
- 3.2 This will see the delivery of development in and on the edge of Cambridge at North West Cambridge, Cambridge Southern Fringe and Cambridge East and at the new town of Northstowe, with additional growth planned for the County's market towns.
- 3.3 The Cambridgeshire authorities recognise that additional flexibility beyond the current strategy may be required, if it becomes apparent that higher growth rates are needed to realise the County's economic potential and further growth is sustainable and can be supported by necessary infrastructure.
- 3.4 The key objective of the strategy will be to locate homes in and close to Cambridge and to other main centres of employment while avoiding dispersed development which increases unsustainable travel and makes access to services and community facilities difficult. Other sustainable locations for growth will focus mainly on the market towns.
- 3.5 In these circumstances, it is considered that there may be potential to deliver up to an additional 15,000 new homes overall (3,600 new homes a year from

2011 to 2031), as set out in the authorities' previous advice of June 2009, as follows:

- Market towns Beyond 75,000 homes, the next option would be to enhance the role of market towns in selected locations where job growth, regeneration and appropriate infrastructure improvements can support further housing development helping to make these towns more selfcontained.
- Transport links Alongside this, there may be some limited potential for sustainable expansion at other towns with excellent transport links;
- Cambridge Green Belt Further development in the Green Belt is not a priority because the review of the Green Belt arising from the 2003 Structure Plan is only now being incorporated in Local Development Documents. The review has been thorough and comprehensive, looking at all quadrants of the City fringe, releasing those areas which can be developed with least harm to the purposes of the Green Belt and additionally at North-West Cambridge, where justified by the exceptional needs of Cambridge University. Other proposed Green Belt releases have been rejected by recent studies and by public examination Inspector's reports. The subsequent delivery of new developments providing in the order of 20,000 new homes on the Cambridge Fringes should be the focus of delivery for the foreseeable future. Therefore Review of the Green Belt should be held in reserve until such time as the need for the Review is confirmed and currently planned developments are well advanced.
- Rural areas Significant development in villages is not generally sustainable and does not form a part of the strategy. Only small scale development to meet local housing needs will normally be permitted.
- 3.6 Since submission of Cambridgeshire's previous advice in June, the authorities have undertaken further work to identify the level of provision likely to be both sustainable and deliverable during the Plan period.
 - [It is suggested that a table be included giving an indicative District breakdown of annual housing figures if this can be agreed by the Cambridgeshire authorities. See paragraphs 5.5 to 5.12 of the main report for background to this.]
- 3.7 It should be stressed that the table contains the authorities' best projections at the current time, and, in particular, will be dependent on more work being undertaken on housing land availability and, essentially, the provision of infrastructure necessary to support this growth. The authorities would welcome working further with the Regional Assembly to establish more definitive figures than has been possible in the timescale of the current consultation.

Question 4: Do you agree we have covered all the regional impacts of the four scenarios that have been identified? If not, what else should we have addressed?

4.1 Comments are given under the question on the Integrated Sustainability Appraisal (section 8 below).

Question 5: Do you agree that the vision and objectives of the current Plan remain suitable for the revised Plan. If not, what changes would you make and why?

- 5.1 The Cambridgeshire authorities have developed a vision and objectives for the future of Cambridgeshire to 2031 which have informed our all work on the East of England Plan review and our response to this consultation. This is given as an attachment to this response [Appendix 4 to this report].
- 5.2 In relation to the current East of England Plan's vision and objectives, the Cambridgeshire authorities' comments are set out below.
- 5.3 **Overall Spatial Vision** The vision would be improved by adding reference to the need for development to adapt to the impacts of climate change this will be a fundamental consideration throughout the period of the plan review. While objective (ii) refers to the need to reduce the region's "exposure to the effects of climate change", this point needs to be brought out in the Overall Spatial Vision.
- 5.4 **Objective** (i) This objective should add reference to the need to expand digital infrastructure to reduce the need to travel. With lack of resources for new infrastructure, the second point on "effecting a major shift in travel away from car use towards public transport, walking and cycling" will assume even more importance during the Plan period. This aspect of behavioural change could be stressed further by referring to the necessity for a fundamental shift in behaviour.
- 5.5 **Objective** (ii) This objective focuses on further housing growth, through the use of phrases such as "securing a step change in the delivery of additional housing", to the exclusion of other considerations. Local authorities and their partners in Cambridgeshire have already planned for a step change in housing development in line with the current East of England strategy; the emphasis must now be on successfully delivering this strategy in a period of prolonged recession and scarce resources.
- 5.6 **Objective (iii)** While this highlights the need to support the region's business sectors and clusters, it could also refer to the need to capture benefits from emerging sectors and the importance of the low carbon economy. While the objective of "improving connections to economic opportunities in London" may be an important consideration for southern parts of the region, to have this as an objective for the entire region would run counter to the previous point of "improving the alignment between the location of workplaces and homes".
- 5.7 **Objective (iv)** This could be improved by reference to the need for future development to promote healthy lifestyles. The first point on "providing a well designed living environment" is supported, but could be read as applying only to new housing; the Plan should try to secure the best design in all types of development. Development should also recognise and enhance the region's distinct sense of place.
- 5.8 **Objective (v)** While the re-use of previously developed land is supported, it needs to be recognised that not all previously developed land will be in

- sustainable locations; this should refer to "appropriately located previously developed land".
- 5.9 Other changes may be needed to reflect the new plan period (to 2031); to take into account the intention to have a single Regional Strategy; and to reflect any significant changes to the existing policies, particularly those relating to the distribution of housing and employment development.

Question 6: Do you have any evidence to suggest that policies other than those identified need to be updated or created?

- 6.1 The Cambridgeshire authorities' response to the request for advice on the Cambridge Sub-Region policies will be given separately. In regard to the other policies in the East of England Plan, the authorities' response is set out below.
- 6.2 **Policy SS1 (Achieving Sustainable Development)** It is noted that EERA intend to prepare a new overarching policy relating to adaptation and mitigation of climate change, which is welcomed by the Cambridgeshire authorities. However consideration needs to be given to how this new policy would relate to the existing wording of policy SS1, which sets the context for how Local Development Documents should address issues relating to Climate Change.
- 6.3 Policy SS4 (Towns other than Key Centres and Rural Areas) There is a need to review this policy to reflect an enhanced role for market towns and other key service centres, in light of the Taylor Report and in Cambridgeshire the evidence provided by the Cambridgeshire Development Study. The policy needs to state that, beyond catering for purely local needs, there is some scope for these centres to capture the wider benefits of growth, for example by exploiting sectors such as environmental technologies, high value manufacturing, renewable energy and tourism.
- 6.4 Employment related policies The Consultation Draft Planning Policy Statement on Prosperous Communities (PPS4, May 2009) has significant implications for the Plan's employment related policies. Draft PPS4 sets out a wide range of new requirements for Regional Strategies, including the identification of employment land targets; regionally significant office developments; existing and emerging employment clusters; town centres; distribution networks; and amended parking standards. Subject to the publication of the final PPS there is likely to be a need to review policies:
 - SS6 (City and Town Centres)
 - E1 (Job Growth)
 - E2 (Provision of Land for Employment)
 - E3 (Strategic Employment Sites)
 - E4 (Clusters)
 - E5 (Regional Structure of Town Centres) dependant on the availability of new local evidence
 - T10 (Freight Movement)
 - T14 (Parking)

- 6.5 **Environment policies** There is likely to be a need to make factual amendments to this chapter of the Plan to take account of new information, such as new green infrastructure assets of regional significance. Consideration should also be given to the implications of draft Planning Policy Statement 15: Planning for the Historic Environment for review of the policies.
- 6.6 **Environment and water management policies** Consideration needs to be given to the approach set out in the Plan's Environment and Water Management policies, given the fundamental revisions to flood and water management planning and practice emerging through the Floods and Water Management Bill.
- 6.7 **Waste management policies** No reference is made in the consultation document to how policies WM1 and WM6, which form part of the approved East of England Plan, will be considered as part of the review of the Plan.
 - WM1 (Waste Management Objectives) In the case of WM1 it is considered that there is a need to review this policy as it sets the framework for policies WM2, WM4, WM5, WM7 which are all to be subject to a separate review, as well as any new waste policies which are subsequently brought forward.
 - WM6 (Waste Management in Development) It is also considered that policy WM6 should be revised to take account of the lack of available employment land or previously developed land to provide new waste management facilities in major development areas.
- 6.8 In relation to the content of waste management policies it is noted that it is EERA's intention that the content of the majority of the waste management policies should be revised so that these can form part of Draft East of England Plan revision to be submitted to Government by the end of March 2010.
- 6.9 Cambridgeshire County Council officers have provided initial comments on the scope of the changes proposed by EERA. Key points included the following:
 - There is a need to maintain the principle of regional self sufficiency for waste management as set out in policy WM1 (Waste Management Objectives) and the principle of county self-sufficiency which underlies this
 - In areas where it may not be possible to make provision for non-inert landfill, intensive treatment of residual waste should be put in place to prevent waste being diverted to other areas within the region which have landfill capacity. This would be consistent with the principle of county selfsufficiency
 - A target relating to residual waste should be included
 - A regional policy relating to commercial, demolition and excavation waste is supported
 - EERA's proposed approach to reducing the amount of waste imported from London to the East of England region to 3% by 2031 is supported

- There is a need to strengthen policy WM6 (Waste Management in Development) to ensure that sustainable waste management facilities form part of major development areas
- The need for additional stable non-reactive hazardous waste landfill in relation to policy WM7 (Provision for Hazardous Waste and other Regionally Significant Facilities) is accepted

This response should be taken into account in the formulation of the policies to be prepared by EERA.

- 6.10 **M1** (Land won Aggregates and Rock) There is an existing requirement in the East of England Plan that policy M1 should be reviewed to include figures for aggregate provision from 2017 onwards and to give consideration to specialist minerals as well as recycled construction waste (paragraphs 12.3 and 12.4 of the existing text). This policy should be revised to take account of the new figures relating to aggregate provision which have been published. Consideration also needs to be given to whether the production of hard rock (limestone) can be maintained in the longer term.
- 6.11 **Implementation, Monitoring and Review** While the content of Policy IMP2 (Monitoring the RSS) may not need reviewing, there is a need to review the existing targets and indicators set out in the Monitoring Framework to ensure that these are consistent with the new East of England Plan.
- 6.12 Regarding implementation, it is essential that the East of England Implementation Plan is updated to reflect the distribution and levels of growth emerging from the current review. Given the likely lack of resources for any major new infrastructure over the Plan period, the review needs to establish a realistic and deliverable strategy, and in particular highlight where growth is dependent on new infrastructure and how this is to be provided.

Supplementary Question 7: Do you have any comments on the sub-area profiles?

- 7.1 The Cambridgeshire Sub-area Profile is a useful background document, setting out the scenarios in relation to this area and describing 'baseline' information under a number of topic sources identified in the sustainability framework.
- 7.2 However, it is considered that this could be improved by:
 - Paragraph 2.1c It would be informative in the Sub-Area Profile to have a
 more detailed breakdown of the dwelling stock figure for Cambridgeshire
 (250,000 dwellings at 2007/08) by local authority area. This would indicate
 the scale of additional growth set out in the scenarios more clearly. (For
 example, the Integrated Sustainability Appraisal shows that regionally
 Cambridgeshire is second only to Peterborough in the percentage increase
 on the existing housing stock for scenarios 1 to 3, and second only to
 Haven Gateway for scenario 4.)
 - 'Call for Proposals' (paragraphs 2.1e, 3.21 and 3.23) The Cambridgeshire authorities welcome the statement (paragraph 3.23) that the Regional Assembly accepts the authorities' view regarding the Call for

Proposals (set out in paragraph 3.20 and the table that follows it). As set out in previous advice, the Cambridgeshire authorities have considerable doubts about the viability of new settlements due to the high cost of providing suitable infrastructure; lack of sustainability for jobs, services and transport; the likelihood of diverting delivery from the current strategy; and the lack of justification in terms of housing delivery. The Cambridgeshire Development Study identifies the creation of new settlements as generating the highest carbon emissions of all the options modelled.

Regarding paragraph 3.21, the authorities did not express a view on the submission of the proposal at Six Mile Bottom in East Cambridgeshire, because it was submitted several months after the submission period closed and the authorities were not aware that it was being formally considered by the Assembly. It should be noted that the proposal is a former scheme that was rejected as being unsuitable when the 2003 Structure Plan was being prepared. The status of this scheme needs to be clarified - along with any other proposals that may by put forward in the future. It is the view of the Cambridgeshire authorities that Six Mile Bottom is not a valid proposal within the terms of this review and that it is an unsustainable and undeliverable development, not worthy of further consideration.

- Paragraph 2.1f This refers to the inclusion of a summary of the specific policies that refer to Cambridgeshire, but at paragraphs 3.25 3.28 only the Cambridge Sub-Region (CSR) policies are named. Policies H1 (Regional Housing Provision) and E1 (Job Growth) are included but not named, and could be referenced. Other policies having a specific relevance to Cambridgeshire and not mentioned are: E4 (Clusters); E5 (Town Centres); E6 (Tourism); and SS5 (referring to the Fens).
- Paragraphs 4.22 4.26 This section could also refer to the large number
 of Cambridgeshire's historic towns and villages, in addition to references to
 Cambridge, Wisbech and Ely. The table at paragraph 4.25 needs to make it
 clear that these are designated historic features and do not encompass all
 historic features in Cambridgeshire. This table could also include
 conservation areas.

Supplementary Question 8: Do you have any comments on the Integrated Sustainability Appraisal? Is there any further information that should be taken into account?

Climate change mitigation and adaption

8.1 The Integrated Sustainability Appraisal (ISA) fails to take account of the likely impacts of climate change over the Plan period and the implications of this for the growth scenarios. Flooding, for example, is almost solely considered in relation to development at coastal locations. For Cambridgeshire, the Appraisal only identifies that "there is widespread flood risk" within the sub-area, and that "it is unclear whether any of the scenarios would lead to unavoidable impacts". The Cambridgeshire Development Study highlights that, according to the Environment Agency, around 23% of the County is at risk of 1 in 100 year flood events. There needs to be a better understanding of the risk flooding poses across the region – and how climate change is likely to increase this risk - particularly in relation to the higher growth scenarios.

Biodiversity

8.2 Biodiversity is generally considered in relation to Breckland and coastal areas only; there is no wider consideration of biodiversity across the region and how the different levels of growth suggested by the scenarios might affect this resource. Within Cambridgeshire for example, there are many sites that have been designated internationally, nationally or at local level for their biodiversity importance, including the Ouse and Nene Washes, Wicken Fen and Devil's Dyke. The ISA states that the level of growth proposed under Scenario 1 could be beneficial for the area around Cambridge, giving people good access to the Fens "where much work is underway to restore parts to a more natural landscape that is accessible to the public (e.g. the Great Fen Project)". There is no further consideration of how the higher growth scenarios would affect Cambridgeshire's biodiversity, other than the statement that a Regional Scale Settlement at Alconbury, under scenario 2, could conflict with efforts to restore wetland functioning or alternatively could help recreate more natural fenland landscapes.

Infrastructure

- 8.3 Under scenario 1, the ISA states that Cambridge "is a city without major existing air quality issues and with good (and improving) public transport links". Similarly, paragraph 3.1.29 states that "it must be assumed" that suitable transport infrastructure can be put in place to allow residents to access the city centre. It needs to be recognised that there is an Air Quality Management Area in Cambridge encompassing the area around the bus station, the trafficked parts of the historic core, the inner ring road, junctions with the inner ring road and main radial routes into the City, and there have been recent declines in air quality in the City centre. The impacts of the growth scenarios on air quality need to be properly considered in the Sustainability Appraisal.
- 8.4 Improvements to public transport are needed to deliver the current growth strategy and it should not be assumed that new infrastructure will release capacity to deliver future growth. The Cambridgeshire authorities are intending to undertake further work to identify the extent to which the transport capacity of the City is a constraint to long term growth.

Historic environment and landscape

- 8.5 The key issues tables 2.6 and 2.9 could be broadened in scope to consider a wider range of issues affecting the historic environment. Some of the statements in the ISA are vague; for example, under consideration of scenario 2 which promotes large scale growth at Cambridge it is stated that the historic environment may be susceptible, but "there will be measures that can be put in place to mitigate effects".
- 8.6 Potential threats to the historic environment of Cambridge are highlighted under scenarios 1 and 2, but not under scenario 3, which features a higher level of growth. Similarly the landscape setting of Cambridge is highlighted as one of particular sensitivity under scenarios 1 and 2, but not under scenario 3.

Miscellaneous comments

- 8.7 Other points that need to be addressed in the ISA are that:
 - It is stated that scenario 3 would lead to a lower level of growth in South Cambridgeshire compared to scenario 1 (ISA, paragraph 5.1.11). This is not correct: scenario 1 would deliver 23,600 new homes over the Plan period for South Cambridgeshire whereas scenario 3 would deliver 23,920.
 - Paragraph 9.5.6 states that for scenario 3 "housing rates in East Cambridgeshire district are increased to 201-400 dwellings per annum".
 This is not correct: for East Cambridgeshire the housing rate under scenario 3 is 620 per annum.
 - The Appraisal needs to use consistent terminology for clarity: the Profile refers to the Cambridgeshire sub-area, however, the Sustainability Appraisal uses the terms Greater Cambridge (Table 7.1 and Section 7.3), the Cambridgeshire Sub-Area, Greater Cambridgeshire Sub-Area and Cambridge area (all Table 7.5).

<u>APPENDIX 2: PROPOSED RESPONSE TO EERA CONSULTATION ON CAMBRIDGE SUB-REGION POLICES (CSR 1-4)</u>

CSR1: Strategy for the Sub-Region

1. It is considered that the geographical coverage of this suite of policies should be expanded to encompass the whole of Cambridgeshire. They should also cater more specifically for the needs of different parts of the County. Existing policy for the Cambridge sub-region could be complemented by the addition of a policy framework for the wider County; for example, promoting an enhanced role for market towns, including the necessity for infrastructure provision, regeneration of the urban fabric and improving the prospects for new jobs as well as providing some capacity for further housing growth. Key links between areas, such as Fenland and Peterborough, should also be recognised.

CSR2: Employment-Generating Development

- 2. The changing economic landscape means that there is a need to revisit the assumptions behind these policies. The importance of working towards economic recovery especially in areas with the most fragile economic base needs to be recognised and could take many years. Also there is a need for these policies to promote emerging sectors and to help deliver a low carbon economy.
- 3. The selective approach to promoting the continuing success of the Cambridge sub-region as a centre of high technology and research is supported. However if the geographical coverage of this suite of policies is to be expanded to cover the County as recommended above, then the policy framework should be amended to reflect this wider approach. This approach would recognise the need to promote the economy in Fenland and other northern areas of Cambridgeshire whilst still maintaining selective policies in and close to Cambridge, ensuring research and development are given priority in a tight land market.

CSR3: Green Belt

4. The aim of the policy, that a Green Belt should be maintained around Cambridge to define the extent of urban growth, is supported. There may be scope for a future review of the Green Belt, but this should be held in reserve until such time as the need for the review is confirmed and currently planned developments are well advanced.

CSR4: Transport Infrastructure

- 5. This policy currently contains little that is specific to the Cambridge sub-region. If the geographical coverage of this suite of policies is to be expanded as recommended, then this policy would need to be reviewed to set out a wider transport strategy for Cambridgeshire as a whole.
- 6. Saved policies P9/9 (Cambridge Sub-Region Transport Strategy) and P8/10 (Transport Investment Priorities) of the Cambridgeshire and Peterborough

Structure Plan provide a starting point that could be used as a basis for revising policy CSR4, also taking into account the need to mitigate and adapt to the effects of climate change. It is considered that a strong link needs to be made between the growth strategy and the infrastructure improvements needed to support it, especially given the current recession and significant reductions in public spending.

APPENDIX 3: SUMMARY OF EXISTING CAMBRIDGE SUB-REGION POLICIES FROM "EAST OF ENGLAND PLAN" (May 2008)

CSR1: Strategy for the Sub-Region

- Existing policy CSR1 sets out a vision for the Cambridge sub-region to 2021, to continue to develop as a world leader in higher education and research and to spread the benefits of the knowledge-based economy. The historic character and setting of Cambridge and the sub-region's market towns should be protected and enhanced.
- 2. CSR1 sets out the existing strategy for the area, which is currently being delivered through authorities' Local Development Frameworks. This states that planning policies should focus development firstly in the built up area of Cambridge, before considering land around the periphery of the City, the new settlement of Northstowe and land within, or on the edge of, the market towns.

CSR2: Employment-Generating Development

3. Policy CSR2 states that employment land in and close to Cambridge should be reserved for development which can demonstrate a clear need to be located in the area to contribute to the continuing success of the sub-region as a centre of high technology and research.

CSR3: Green Belt

4. Policy CSR3 states that a Green Belt around Cambridge should be maintained to preserve the character of the City, maintain and enhance its setting and prevent communities around Cambridge from merging into one another and with the City.

CSR4: Transport Infrastructure

5. Policy CSR4 states that new transport infrastructure should build upon the existing high quality public transport systems, high levels of cycling and demand management measures. The aim should be to reduce the need to travel and secure the fullest use of public transport, walking and cycling.

<u>APPENDIX 4: SPATIAL PLANNING VISION FOR CAMBRIDGESHIRE (FROM CAMBRIDGESHIRE AUTHORITIES' ADVICE, JUNE 2009)</u>

By 2031 Cambridgeshire will be -

In relation to its people:

 a County offering attractive homes, jobs and a high quality of life in a range of distinctive urban and rural communities with opportunities for all residents and workers to achieve their maximum potential;

In relation to the economy:

o acknowledged as a world leader in knowledge based business and research, yet more diverse in its economy both in the Cambridge Sub-Region and across the north and east of the County, including the expansion of appropriate-scale manufacturing and low carbon technologies;

In relation to transport and accessibility:

 served by frequent high quality public transport within and between Cambridge and the market towns, with a closer relationship of homes to jobs and services, access to high quality routes for cycling and walking and good links to the countryside;

In relation to sustainability:

o an exemplar of low carbon living, efficient use of resources, sustainable development and green infrastructure, founded on the retention of Cambridge as a compact city and the expansion of market towns with closely linked village communities:

In relation to the environment:

o outstanding in the conservation and enhancement of its urban, rural and historic environment including a vibrant university city, attractive market towns, spacious fen landscapes, river valleys and an overall high degree of biodiversity;

In relation to climate change:

o well prepared for the impact of climate change and highly adapted to its effects, especially in the extensive low lying areas of the County.

<u>APPENDIX 5: SUMMARY REPORT ON CAMBRIDGESHIRE AUTHORITIES'</u> <u>CONSULTATION ON THE EAST OF ENGLAND PLAN REVIEW</u>

1 BACKGROUND

- 1.1 Following an earlier consultation exercise, reported to Cabinet on 5 May 2009, the Cambridgeshire authorities undertook a range of further communications and consultation work to:
 - Raise the profile of the East of England Plan review with residents and businesses in Cambridgeshire
 - Highlight the Regional Assembly's public consultation on housing and economic growth options and encourage people to respond to EERA
 - Gather views to inform the response to the public consultation set out in this Cabinet report.

This work was promoted under the title "Future Cambridgeshire: Your County – Your Choice".

1.2 This report summarises the findings of the consultation undertaken by the Cambridgeshire authorities on the East of England Plan review. It contains details of all the submissions made up until 16 November. A full report on the consultation will be prepared and it is intended that this will be submitted to the Regional Assembly as background information to inform the review. Should any further submissions be received, these will be added to the full report and reported verbally to Cabinet.

2 KEY FINDINGS

- The majority of those who responded considered that housing growth should be lower than EERA's Option 1 (3,600 new homes a year in Cambridgeshire).
- Cambridgeshire businesses expressed a similar view, although in discussions there was some support for further growth subject to further infrastructure being provided.
- In relation to the distribution of development, the results indicated that growth should be focused on existing settlements and on public transport corridors rather than in additional new settlements. Locations considered attractive to business were those with good road links, high density business and resident population and good access to London.
- A key concern expressed by both residents and businesses was the need for additional infrastructure, services and facilities to serve existing communities, as well as any future development. A number of those who responded emphasised that infrastructure should be provided - or improved - before any additional development takes place.
- Transport infrastructure and community facilities were identified as being of
 greatest importance by business and residential respondents. However a
 number of respondents also identified sport and leisure facilities and green
 infrastructure as being their key priorities for the County.

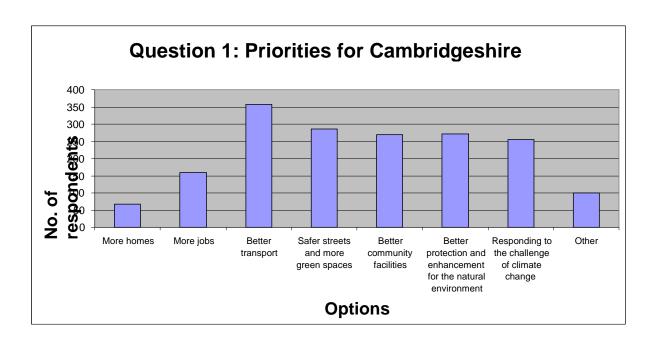
- Protection and enhancement of the natural (and in some cases the historic environment) together with the need for high quality development were also key concerns.
- A number of respondents also suggested that future development should include more sustainable construction standards and learn from European examples of good practice.

3 RESIDENTS' QUESTIONNAIRE - "Future Cambridgeshire: Your County – Your Choice"

- 3.1 Communications work with local residents included an online questionnaire set up on the County Council's website in September 2009. Links to the questionnaire were provided in letters sent to stakeholders and a link was provided from the County Council's homepage. The questionnaire was heavily promoted using a mix of traditional media, social media, youth media and groups, targeting of specific groups and e-mail marketing.
- 3.2 Paper copies of the questionnaire were also provided at:
 - Three EERA consultation events held across the County
 - Five day-long "roadshow" events held as part of National Customer Service Week from 5 to 10 October
 - Libraries throughout the County
- 3.3 As of 16 November 2009, 611 responses to the questionnaire had been received.
- 3.4 The questionnaire asked three main questions. Space was also provided for people to give further comments.

Question 1 – Priorities for Cambridgeshire

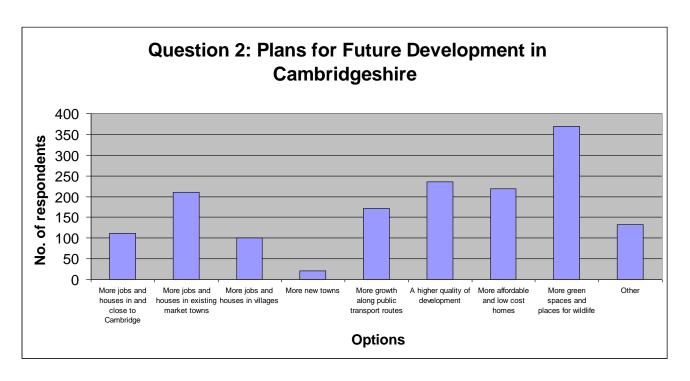
- 3.5 The first question asked people to identify their three top three priorities for Cambridgeshire from a list of eight possible choices.
- 3.6 The three most important priorities were considered to be "better transport" (358 respondents), "safer streets and more green spaces" (286) and "Better protection and enhancement for the natural environment" (271 respondents)
- 3.7 "Better community facilities (e.g. schools and healthcare" (270 respondents) and "responding to the challenge of climate change" also scored highly (255 respondents). The priority which was considered to be least important was the need to provide "more homes" (67 respondents).



- 3.8 A range of other issues were also identified by 100 respondents in relation to question 1 including the following:
 - A greater number of affordable homes should be provided
 - Protection of the historic as well as the natural environment is needed
 - Protection of agricultural land and the promotion of agriculture
 - Provision of cultural, leisure and sporting facilities
 - Development of low carbon infrastructure to address the issue of diminishing oil supplies
 - Protection of the Cambridge Green Belt and safeguarding the City's setting
 - Support for existing services within villages
 - Support for local authorities making decisions on future development, rather than these decisions being taken at the regional level

Question 2 – Plans for the future development of Cambridgeshire

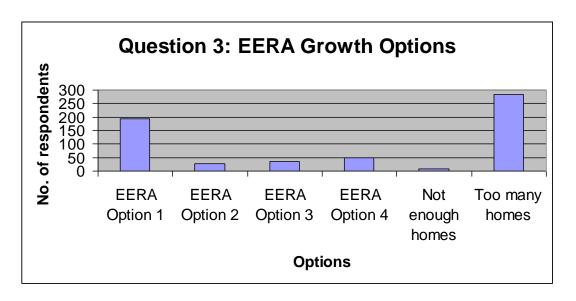
- 3.9 The second question sought views on residents' aspirations for future development and how this should be delivered. Nine options were presented.
- 3.10 The option which received the most support was "more green spaces and places for wildlife" (369 respondents), followed by "a higher quality of development" (235 respondents) and "more affordable and low cost homes" (219 respondents).
- 3.11 In relation to the distribution of development "more jobs and houses in existing market towns" (211 respondents) received the greatest level of support, followed by more jobs and houses "along public transport routes" (172 respondents) "in and close to Cambridge" (111 respondents) and "in villages" (100 respondents). The option which received the least amount of support was the development of "more new towns" (21 respondents).



- 3.12 In addition 133 respondents suggested other issues which should be considered including the following:
 - The need for additional infrastructure including schools, transport, facilities for children, community facilities, green infrastructure and leisure facilities
 - One respondent supported the development of further new towns to avoid conflict with existing communities
 - Support was expressed by a number of respondents for smaller developments particularly as infill developments or in villages
 - Protection of the Cambridge Green Belt and its setting was supported by some respondents to avoid the coalescence of Cambridge City with the surrounding villages
 - More sustainable or low carbon homes and new buildings

Question 3 – EERA's options for growth

- 3.13 The third question sought residents' views on the scale of growth within the County as set out by EERA in the consultation "East of England > 2031 Scenarios for Housing and Economic Growth".
- 3.14 Of the responses received, the greatest level of support was for a lower growth option than that suggested by EERA's Option 1 (283 respondents). 194 respondents supporting a level of growth consistent with Scenario 1 as the maximum level of development.



3.15 The option which received the least amount of support was that not enough homes are suggested in any of the options presented by EERA (8 respondents).

Question 4 - Any other comments

- 3.16 The fourth question gave residents the opportunity to make additional comments. A total of 307 respondents made comments concerning a wide range of different issues, including:
 - Concern was expressed that the south east of the country is the focus for major development and that this is being driven by London and / or inmigration to Cambridgeshire
 - There was also support for environmental improvements and further investment at Wisbech
 - Consideration should be given to "transition towns" (which are intended to address the issues of climate change and diminishing oil and gas supplies) as an alternative model for future development
 - Development should be modelled after European examples of low energy developments which discourage commuting but encourage walking and cycling and provide good rail links
 - A number of representations were received from residents, Ickleton Parish Council, Stop Hanley Grange Group and Ickleton Society objecting to the proposed development of Hanley Grange.
 - A number of representations were received from residents objecting to the proposed development of the Mereham new settlement or a new settlement in the A10 corridor.
 - Concerns were also expressed about the development of Alconbury airfield due to its impact on the rest of Huntingdonshire District

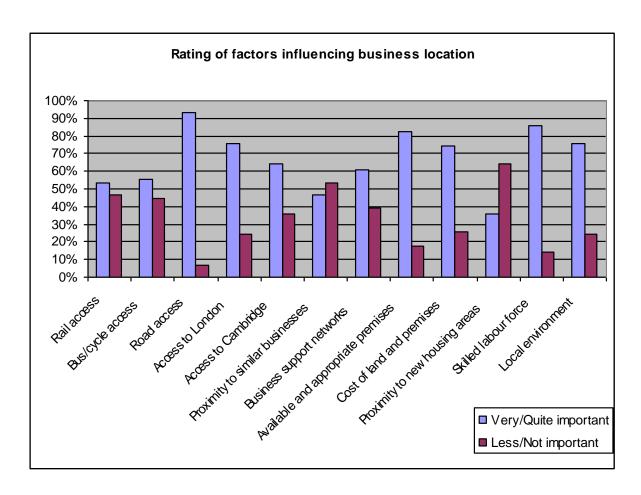
Other comments received

3.17 A number of representations were also received in addition to responses to the questionnaire:

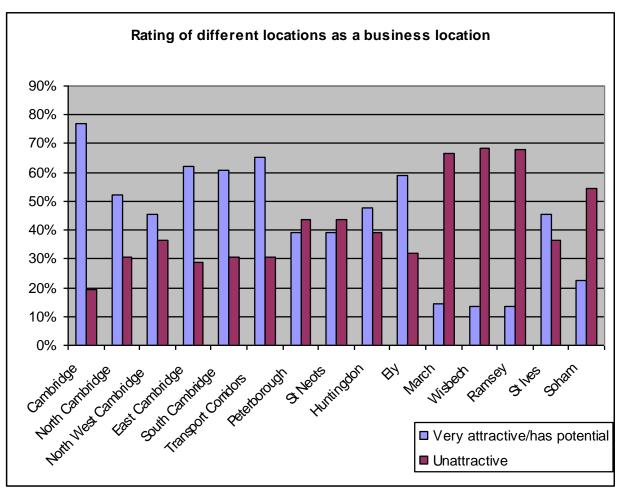
- Representations from RLW Estates the principal promoter of the Denny St Francis new settlement of 12,750 dwellings at Waterbeach - expressed concern about the levels of growth proposed by EERA in relation to demographic changes, housing affordability and the economy. RLW Estates also sought the support of the County Council in relation to the development of a new settlement at Waterbeach as part of a Cambridge focused strategy.
- Four e-mails from residents were received objecting to the development of the Hanley Grange new settlement and two comments were also received through the County Council's webpage also objecting to Hanley Grange.

4 BUSINESS QUESTIONNAIRE - "Future Cambridgeshire: Your Business – Your Choice"

- 4.1 In parallel with the work described above, an online questionnaire entitled "Future Cambridgeshire: Your Business Your Choice" was also produced.
- 4.2 This questionnaire was made available on the County Council's website in September 2009, advertised in the local press, promoted via local business networks and business member organisations and distributed by District Councils' Economic Development officers.
- 4.3 To encourage Cambridgeshire's businesses to participate in this consultation three business breakfasts were also arranged and promoted in tandem with the questionnaire. The breakfasts were arranged for the following dates:
 - Cambridge City / South Cambridgeshire (16 October)
 - Huntingdonshire (18 November)
 - Fenland / East Cambridgeshire (20 November)
- 4.4 These events were chaired by the County Council's Chief Executive and attended by Economic Development and Planning staff from the Cambridgeshire authorities. As of 5 November, 67 business and business member organisations had registered to attend the breakfasts and 29 had responded to the online questionnaire. The results from this work are summarised below.
- 4.5 The questionnaire asked businesses to identify what factors held the biggest influence on their choice of business location, and the responses are shown below.



- The great majority of businesses rated road access as a very or quite important factor
- Other factors rated highly were a skilled labour force, available and appropriate premises, local environment, cost of land and premises and access to London
- 4.6 More than two thirds of businesses were against further housing growth above and beyond that already planned for Cambridgeshire. Of those that did respond positively, the majority stated that transport infrastructure needed to be improved first.
- 4.7 Businesses were then asked to rate which locations were most attractive as a location to set up and grow their business. Results are shown below.
 - The locations rated the most attractive included Cambridge, transport corridors (e.g. Northstowe, East Cambridge), South Cambridge and Ely.
 - Fenland locations were the lowest rated, however very few of the businesses answering the survey were already located in Fenland.



- When asked what particular factors came to mind when rating the locations, the most common responses were:
 - Access to potential customers, population and business density
 - Accessibility, particularly levels of congestion, ability of staff to get to work
 - Availability of skilled staff
 - Cost of premises and land
 - Access to Cambridge, association with the Cambridge 'brand' and the hi-technology cluster
 - Quality of life and likelihood of crime
- 4.8 The next question asked businesses what they saw as the main threats to business growth over the next five years. The most common responses were:
 - Access to finance and increasing costs through taxation
 - Poor transport infrastructure
 - Availability of skilled staff
- 4.9 The concern with infrastructure particularly transport was reflected in the discussion at the first business breakfast. The focus of the discussion was on the need to address the existing infrastructure deficit before considering further growth in the County. Transport was highlighted as a particular concern, having the largest impact on economic competitiveness; however the need for a high quality environment, retail provision, conference facilities and appropriate business premises was also raised.

5 CONCLUSIONS

- 5.1 It is hoped that the communications work summarised above has helped stimulate debate about the future strategy for the County and raise awareness of the review of the East of England Plan that EERA is undertaking.
- 5.2 The findings of this questionnaire together with the survey circulated to Cambridgeshire businesses have been used to inform the preparation of the consultation response to EERA. While more work will need to be done to ensure that the strategy developed by the Cambridgeshire authorities reflects the views of residents and businesses and benefits from widespread support, it is considered that the work summarised here provides a useful basis on which to build.
- 5.3 All respondents who gave their contact details will be contacted to thank them for their contribution, inform them of the key issues arising from the consultation and provide them with the response submitted to the Regional Assembly by the Cambridgeshire authorities.

<u>APPENDIX 6: PROPOSED ANNUAL HOUSING TARGETS FOR CAMBRIDGESHIRE</u> DISTRICTS

PUT FORWARD BY CAMBRIDGESHIRE COUNTY COUNCIL FOR DISCUSSION AT JOINT CAMBRIDGESHIRE REGIONAL SPATIAL STRATEGY REVIEW PANEL (CReSSP), 13 November 2009

- 1. These proposed targets take as their starting point the Cambridgeshire Development Study 2009 which identified land supply sufficient for 75,000 new homes in Cambridgeshire from 2006 onwards.
- 2. The Cambridgeshire advice to EERA (June 2009) advocated a preferred strategy based on building out this current supply over the 25 year period from 2006 to 2031 at a rate of 3,000 homes per annum. It was accepted however that there could be flexibility for up to 3,600 homes per annum if the need was proven. This latter rate was the basis for Scenario 1 proposed by EERA in the current RSS consultation (over the 20 year period 2011 to 2031).
- 3. It is understood that the draft RSS to be submitted by EERA will contain housing totals for each District. Therefore it will be helpful if the authorities can reach an agreed view of what those totals should be. It is assumed that we should be working within the Section 4/4 advice range of 3,000 to 3,600 per annum. A proposed distribution is set out in the table following this explanatory text.
- 4. The table is based on a review of circumstances in each District as follows:
 - Cambridge City Cambridgeshire Development Study annual supply rate = 700 per annum

No change is proposed, as urban capacity remains very constrained and even **700** per annum may therefore prove challenging. Any additional capacity would depend on Green Belt Review in the longer term. (*Scenario* 1 = 960)

• **South Cambridgeshire** - Cambridgeshire Development Study annual supply rate = 1,120 per annum

In view of the huge delivery challenge, including the building out of Northstowe and Cambridge East, there is no case for increasing this figure and indeed current work on housing trajectories suggests a slightly lower rate would be more appropriate. **1,050** per annum is suggested here. Any significant additional capacity would depend on Green Belt Review in the longer term. (Scenario 1 = 1,180)

• **East Cambridgeshire** – Cambridgeshire Development Study annual supply rate = 244 per annum

It is clear from the background work underpinning the East Cambridgeshire Core Strategy and the emerging Masterplan proposals for Ely, Soham and Littleport that there is significant additional potential for sustainable development in the District provided that key infrastructure issues are resolved (e.g. A142 Ely). **550** per annum is considered attainable and is

within historic delivery rates. (Scenario 1 = 390)

 Fenland – Cambridgeshire Development Study annual supply rate = 417 per annum

The District Council has aspirations for substantial expansion of its Market Towns, principally March, Wisbech and to a lesser extent Chatteris. It is important that such development should be underpinned by job growth and infrastructure provision. Therefore whilst an increase to **500** homes per annum is currently suggested, further capacity would be dependent on future review of market town strategy. (Scenario 1 = 530)

Huntingdonshire – Cambridgeshire Development Study annual supply rate
 459 per annum

Some increase is now appropriate to take account of potential additional capacity at St Neots (subject to satisfactory resolution of highway infrastructure constraints) and in other sustainable locations. It is therefore proposed to increase the rate to **550** per annum but this is regarded as a maximum deliverable figure. (Scenario 1 = 550)

- 5. This would produce in total:
 - **Cambridgeshire** Cambridgeshire Development Study annual supply rate = 2,941 per annum
- 6. The potential identified in each District as set out above would bring the preferred annual County rate to 3,350 per annum. (Scenario 1 = 3,610)
- 7. Further flexibility up to 3,600 per annum would require additional capacity in the order of 5,000 homes (250 per annum) which might be achievable dependent on the significant qualifications outlined in paragraph 4 above, including:
 - a future review of the Cambridge Green Belt
 - a review of the potential of the market towns in Fenland
 - job growth
 - the provision of key transport and other infrastructure

Table of Proposed Cambridgeshire Local Authorities annual RSS housing targets – put forward for discussion by Cambridgeshire County Council at Joint Cambridgeshire Regional Spatial Strategy Review Panel (CReSSP), 13 November 2009

	Current Housing Supply assuming 2006 start (a)	Completions 2006-2009 (b)	Remaining Supply (a) – (b) = (c)	Annualised rate if spread over period 2009 – 2031 (d)	Potential flexibility for additional annual growth	Suggested annual rate 2011 to 2031 (20 year supply in brackets)		Further flexibility depending on Green Belt or Market Town Reviews.	
Cambridge City	17,172	1,778	15,394	700		700	(14,000)	?	
East Cambridgeshire	7,272	1,914	5,358	244	Ely Master Plan	550	(11,000)		
Fenland	11,176	2,004	9,172	417	March Wisbech	500	(10,000)	?	
Huntingdonshire	12,302	2,200	10,102	459	St Neots	550	(11,000)		
South Cambridgeshire	27,493*	2,830	24,663	1,121		1,050 (21,000)		?	
CAMBRIDGESHIRE	75,415	10,726	64,689	2,941		3,350 (67,000)		+ 250 pa maximum (5,000 total)	

^{*} South Cambridgeshire supply includes long-term capacity at Northstowe and Cambridge East - as noted in the Development Study

- (a) identified in Cambridgeshire Development Study 2009
- (b) completions from Cambridgeshire County Council's 'Housing Development in Cambridgeshire 2001- 2009'
- (c) taking off completions 2006 2009 from supply identified in study
- (d) spreading remaining supply from now until end of RSS review period 2009 2031 (22 years) and averaging this supply to yearly rate

APPENDIX 7: "EAST OF ENGLAND PLAN > 2031" – SCENARIOS FOR CONSULTATION

AUTHORITY	BASE HOUSING STOCK 2008	SCENARIOS 2011 to 2031							
		SCENARIO 1		SCENARIO 2		SCENARIO 3		SCENARIO 4	
		Annual average	20 year target	Annual average	20 year target	Annual average	20 year target	Annual average	20 year target
Cambridge City	46,611	960	19,200	1,110	22,200	1,320	26,420	650	13,000
East Cambridgeshire	33,400	390	7,760	390	7,760	620	12,360	750	15,000
Fenland	41,556	530	10,520	530	10,520	530	10,520	800	16,000
Huntingdonshire	69,588	550	11,080	1,200	24,080	900	17,960	1,200	24,000
South Cambridgeshire	58,968	1,180	23,600	1,330	26,600	1,200	23,920	950	19,000
Cambridgeshire County	250,123	3,610	72,160	4,560	91,160	4,560	91,180	4,350	87,000
Peterborough City	74,530	1,430	28,600	1,560	31,200	1,430	28,600	850	17,000
Other strategic authorities	•	•	•						
Bedford	64,835	970	19,400	970	19,400	970	19,400	1,100	22,000
Central Bedfordshire	105,892	2,120	42,400	2,770	55,400	2,120	42,400	1,750	35,000
Luton	75,512	140	2,840	240	4,840	140	2,840	700	14,000
Southend on Sea	75,602	300	6,080	300	6,080	560	11,140	700	14,000
Thurrock	63,600	950	19,000	950	19,000	950	19,000	800	16,000
Essex	590,897	5,390	107,880	7,400	148,080	6,160	123,200	7,950	159,000
Hertfordshire	457,276	3,770	75,460	3,770	75,460	5,340	106,880	4,750	95,000
Norfolk	385,940	4,150	83,000	4,150	83,000	4,290	85,820	5,650	113,000
Suffolk	320,262	3,220	64,300	3,420	68,400	3,450	69,020	5,050	101,000
East of England Total	2,464,469	26,060	521,120	30,100	602,020	29,970	599,480	33,650	673,000