



# Cambridge City and South Cambridgeshire Local Plan Examinations Matters and Issues Statement

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Representor **Commercial Estates Group**  
CCLP ID **5423**  
SCDC ID **17653**  
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## **Matter 4 Employment and Retail (Tuesday 18 November 2014)**

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- 1.0 **A. Is the forecast growth of net additional jobs (22,100 for Cambridge City and 22,000 for South Cambridgeshire District) based on a clear understanding of business need and a robust evidence base?**
- 1.1 Commercial Estates Group (CEG) generally supports the combined forecast growth of 44,100 net additional jobs over the period 2011 to 2031 included in the Cambridge and South Cambridgeshire emerging Local Plans, as an estimate of the minimum number of jobs the economy is likely to be capable of delivering and a level of growth for which the plans should aim. A more detailed review and commentary relating to forecast growth of jobs is contained within section 2 of the accompanying 'Housing and Economic Technical Assessment – Update' (referred to as "HETA Update").
- 1.2 The Cambridge Draft Local Plan draws on the 2012 East of England Forecasting Model (EEFM) to provide estimates for the future growth of the City economy to 2031, while the South Cambridgeshire Draft Local plan target is based on the 2012 EEFM and Local Economic Forecasting Model (LEFM) forecasts. The 2014 EEFM forecasts have yet to be released. However, Oxford Economics (OE) 2014 forecasts, which use the same macro-economic assumptions as the EEFM, have been analysed (HETA Update, para. 2.3-2.5) and indicate that job growth trends in Cambridge City are likely to continue to follow an upward trajectory and a rate slightly higher than forecast by the 2012 EEFM.

1.3 Table 1 identifies major developments with committed occupiers that are currently in the pipeline in the Cambridge City Urban Area. It indicates that existing proposals have the scope to accommodate in the region of 17,690 jobs.

Table 1 Job Capacity of Proposed Developments in Cambridge Urban Area

| Development Proposal                            | Committed Occupier    | Floorspace (sqm) | Number of Jobs <sup>1</sup> |
|---|-----------------------|------------------|-----------------------------|
| Cambridge Biomedical Campus                     | AstraZeneca           | Unknown          | 2,000                       |
| Cambridge Biomedical Campus – Papworth Hospital | Papworth Hospital R&D | 130,000          | 5,200                       |
| CB1 Station Area                                | Multiple occupier     | 53,560           | 4,300                       |
| North West Cambridge – Cambridge University     | Cambridge University  | 40,000           | 1,600                       |
| Shaftesbury Road                                | Cambridge Assessment  | 42,000           | 3,000                       |
| Peterhouse Technology Park                      | ARM                   | 19,500           | 1,300                       |
| Cambridge Business Park                         | CSR                   | 9,300            | 290                         |
| <b>Total Jobs</b>                               |                       |                  | <b>17,690</b>               |

Source: NLP analysis

- 1.4 The 17,690 jobs already identified account for over 40% of the 44,100 jobs target, showing that:
- a if this job growth trajectory were to continue over the entire plan period 2011-2031, it is likely Cambridge and South Cambridge could exceed their respective targets significantly.
  - b job growth is already running significantly ahead of housing delivery, front loading the development need pressures into the first five and ten years of the Plans. This shows why there is such acute pressure on the housing market in Cambridge, and why reliance on new settlements coming forward at the back end of the plan period does not provide a mechanism for addressing these front-loaded needs.
  - c the focus of growth is almost overwhelmingly concentrated on the Cambridge urban area, reflecting the focus of knowledge-based activity within the Cambridge identified in CEG's original representations and reflected in the Cambridge Cluster at 50 study (RD/E/060).

<sup>1</sup> Total figures rounded

1.5 The number of jobs already in the pipeline implies that Cambridge and South Cambridgeshire have the potential to significantly exceed their forecast job growth. Therefore, CEG concludes that the job forecasts adopted in the emerging Local Plans should be a) assumed to be front loaded in the plan period; b) be regarded as a minimum starting point; and c) seen as potentially an underestimate of the real economic growth potential of the cluster. This reinforces that there is insufficient new housing to support the new employment opportunities.

2.0 **B. Does the evidence base supporting employment and retail policies meet the requirements of Planning Practice Guidance?**

2.1 Based on the evidence currently available, CEG does not wish to comment further on this question in this statement.

3.0 **C. Will the proposed amounts of land for economic development uses meet the needs for all foreseeable types of economic development?**

3.1 Cambridge City Council (CCC) has identified a range of locations, types and sizes of employment land to meet the need for jobs, including a small scale (3.7ha) release from the Green Belt on Fulbourn Road (CCLP Policy 2 and Allocations GB3 and 4). South Cambridgeshire District Council (SCDC) proposes to allocate 6.9 hectares for employment uses on land adjoining Peterhouse Technology Park through Policy E/2 of their emerging plan, also releasing Green Belt.

3.2 This proposed allocation is welcomed, but CEG considers that it could and should be greater to allow flexibility for future growth in line with the requirements of the NPPF to support sustainable economic growth. A larger employment allocation would support integration of employment uses within the urban area, and provide for a greater critical mass of employment space to cater for business needs and expansion requirements.

3.3 Section 2 of the HETA Update reviews the latest evidence on the spatial concentration and distribution of jobs in Cambridge and South Cambridgeshire. The global success of the Cambridge economy is built on a spatial concentration of activity in the centre and fringe of Cambridge City itself: a pattern typical of clusters of high value, knowledge-based activities. Despite the Council's Employment Topic Paper (RD/Top/20) acknowledging the requirements of the NPPF; the Councils' proposed spatial strategy does not effectively reflect the characteristics of the local economy. It therefore poses significant risks to the ability of Cambridge to deliver future growth and innovation and thereby fails to meet the requirements of Paragraph 21 of the NPPF, which requires local planning authorities to:

*'plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries'.*

- 3.4 Within the Development Strategy to 2031 (SCLP Policy S/6), SCDC establish an order of preference for meeting the need for jobs and homes. This recognises that sites on the edge of Cambridge should have first preference, followed by new settlements, and lastly sites in the rural area. This sequential approach is welcomed. However, this order of preference is stated to be followed 'having regard to the purposes of the Cambridge Green Belt' and as has been shown through CEG's Statement on Matter 2, this has completely distorted the application of this sequential approach, to the point that it has created unsustainable patterns of development and resulted in allocations of employment and housing divorced from the urban area of Cambridge which drives the need and demand. As with housing, in employment terms, this gives rise to issues of sustainability (it limits the prospects of non-car travel) and particularly for employment development, of take-up and demand for space from companies who, quite naturally, want to be in or on the edge of Cambridge. It would be appropriate to revise the SCLP Policy S/6 and the allocation of the sites to properly reflect the weight which should be attached to the Green Belt in the context of the NPPF requirement to promote sustainable patterns of development, do everything it can to support economic growth, and meet business needs. A change is required if this policy is to be consistent with national policy.
- 3.5 In summary, CEG considers that the extent of the proposed new employment allocations in or on the edge of Cambridge urban area should be maximised and that the spatial distribution of development allocations should be reconsidered to ensure the economic competitiveness of Cambridge is maintained and the economy achieves its potential.
- 4.0 **D. Do the Plans accurately identify the likely requirements for new retail development (convenience and comparison goods over the Plan period)?**
- 4.1 Based on the evidence currently available, CEG does not wish to comment further on this question in this statement.