

Cambridge Local Plan and South Cambridgeshire Local Plan

Matter 9: Areas of Major Change / Major Development Areas on the edge of Cambridge

Note on Councils' Supplementary Statement Reference Cambridge Northern Fringe East and Relationship with City Deal Transport Schemes

- 1 In my view the Councils' Supplementary Statement to Matter 9C simply confirms the objector's justifiable doubts about the deliverability of substantial R&D space at CNFE within the plan period.
- 2 For clarity, the objector does not seek to suggest that the CNFE cannot deliver R&D space or is an unsuitable location. In fact, our own calculations of R&D land availability made at the time of lodging comments on the submitted plan assumed that the CNFE would be able to deliver a limited amount of R&D space within the latter part of the plan period. We still hope that this will be the case.
- 3 However, this assumption was made before further evidence was produced by the Councils in respect of infrastructure requirements and possible funding streams.
- 4 There were also suggestions at the examination Hearing on day 17 that the objector's proposals for restricted life sciences and bio-medical R&D space to the south of the City would somehow be in competition with space at CNFE. During the Hearing session on day 17 Mr Green was asked to verbally counter his own written and submitted view expressed in evidence that the life sciences and bio-medical R&D space had concentrated and would continue to concentrate to the south of the city close to the core medical and research activities. In our strong opinion and backed by the empirical evidence of where R&D specialisms have chosen to concentrate, the provision of R&D space at CNFE and adjacent to the southern edge of the city would be wholly complementary. This matter, together with employment land delivery and a full assessment of the only other substantial urban edge R&D site promoted at Cambridge South remains to be examined. I attach a copy of the Inspectors' letter confirming that employment land delivery would form the basis of subsequent sessions.
- 5 At the time of writing this Statement the Inspectors await the Councils' response to the letter of 20th May 2015 suggesting a suspension of the Examinations to enable the Councils to revisit the sustainability appraisals so as to appraise all reasonable alternatives (including sites on the urban edge) to the same level as the preferred option. We have assumed that this work will relate to all development types including employment land.
- 6 The Councils' Supplementary Statement states that while the "economic prioritisation of the greater Cambridge City Deal report, a Transport Economic Assessment Report (TEAR) and subsequent reports to the Greater Cambridgeshire City Deal Joint Assembly (RD/CR/142) and City Deal Executive Board (RD/CR/144) identifies four schemes as being 'critical' to the CNFE site (paragraph 3 of Supplementary Statement) these should not be seen as representing the resolved position of the Councils or County Council (paragraph 5 of Supplementary Statement). The Supplementary Statement explains that, "the assumptions within the report, as to the criticality of infrastructure in respect of particular development schemes, is derived from a 'high level assessment' by economic consultants".
- 7 This is, therefore, the Councils' admission that the allocation of a site in the Local Plan is built on, at very best, flimsy evidence. The evidence base cannot satisfy the requirements of PPG (ID: 12-010020140306) with reference to the detail required to be contained within a local plan. PPG requires local plans to pay "careful attention to deliverability and viability" and "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the what, where, when and how questions)".

- 8 During oral submissions at the Examination on day 17 the Councils' contended that the objector might have a valid point if the CNFE was required to meet employment land need. In their view though, the site was not counted in the supply of employment land in the plan period and was not, therefore, an important element of the Local Plan. In our view, quite apart from this being irrelevant because it is an allocation in the Local Plan and, therefore, needs to have robust supporting evidence, it is also untrue in the current circumstances of rapidly changing employment land need, supply and delivery.
- 9 Even the Councils identified in their Matter 4 Statements the CNFE as a "strategic site that will make a significant contribution to further employment provision (paragraph 1.25 RD/TOP/020 and paragraph 30 M4/CCC & SCDC). In addition, paragraph 37 bullet point 4 of M4/CCC & SCDC further identifies the "potential to deliver over 100,000sqm of B1 floor space".
- 10 Finally, the Councils' Supplementary Statement concludes that, "in any event, the City Deal transport infrastructure schemes identified within the report are programmed and there is every prospect of delivery". The Statement provides no further comfort that these schemes will in fact be delivered within the plan period. There is clearly a substantial funding gap and some of the schemes are identified rightly as "at high risk" of delay. The risk of delay relates not only to funding but also to land ownership issues.
- 11 In summary, it is wholly insufficient to rely on a "high level assessment" as the principal evidence base in seeking to allocate and justify what is an important element in the delivery of the economic aims of the plan. It does not represent a robust assessment of delivery and viability as required by Government guidance. In our view the delivery of at least part of the site in the plan period is necessary to assist in meeting the economic R&D land requirements of a city absolutely key to the Government's aim of providing suitable opportunities for the knowledge based and innovative industries.
- 12 It is also clear that the provision of land at CNFE would be entirely complementary to the provision of specialist life science and bio-medical space on the southern urban edge. This would be close to the existing core of such activity, delivering space throughout the plan period but from a relatively early start date. Clearly, given the constraints and challenges of releasing land at the CNFE we might expect to see land releases only in the latter part of the plan period.
- 13 We would request that the Inspectors ask the Councils clearly to consider very carefully employment land delivery particularly related to the life sciences and bio-medical sectors in their further evidence gathering stages of the plans during the suspension of the examination.