

Matter 4 – Employment Provision

CCC Respondent Personal ID: 1801

SCDC Respondent Personal ID: 20942

Name of Responder: Cambridge Past, Present & Future (CambridgePPF)

Date: 12th October, 2013

**Cambridge City Council and South Cambridgeshire District Council
Examination of Submitted Local Plans 2013**

Matter 4 – Employment and Retail Provision

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Note: For ease we have split our comments between Employment and Retail provision.

Summary of this Statement concerning Employment Provision:

- a) CambridgePPF believes it is unrealistic to predict future employment growth for such a dynamic situation as Cambridge with any degree of precision, so arguments about the relative merits of different methodologies are irrelevant;
- b) CambridgePPF believes that the employment projections proposed by CCC of 22,100 jobs and by SCDC of 22,000 jobs do provide a sound basis for forward planning. We are therefore exploring a **Statement of Common Ground** with both Councils covering Employment Provision;
- c) CambridgePPF urges both Councils to draw up unambiguous criteria for companies wishing to re-locate into the Sub-Region so that they must demonstrate a compelling rationale as to why they needed to be in the Cambridge area and how they will support the Cambridge Cluster;
- d) CambridgePPF stresses the difference between demand for employment land and actual need for employment provision: it is what Cambridge actually needs that should be provided for and this should be controlled through the selection criteria.
- e) CambridgePPF supports the concentration of employment in key locations, and stresses the key importance of the Northern Fringe East as meeting much of the City's employment needs;
- f) CambridgePPF objects to the release of Green Belt land at GB3 and GB4 on the grounds that CCC has not adequately demonstrated the exceptional circumstances required by the NPPF.

1. Introduction:

1.1 CambridgePPF is a local charity with some 1,500 members drawn from the local community, which, in its former guise as the Cambridge Preservation Society, has been actively involved with planning and development in and around Cambridge for more than 80 years. Its influence was largely instrumental in the creation of the Cambridge Green Belt in the 1970s. Its policy and position on major development issues is determined by its Planning Committee comprising some 15 members with exceptional experience in urban planning and design, business development, architecture, heritage management, transport, landscape architecture, and other relevant disciplines.

2. Employment Provision:

2.1 With such a dynamic and changing local economy in the Cambridge Sub-Region, it clearly is impossible to forecast the future growth in commercial activity with any real precision over a timescale as long as two decades. Major external perturbations such as the economic recession or the relocation of Astra Zeneca are difficult to predict over such a time horizon. With this caveat, CambridgePPF believes that the employment projections proposed by CCC of 22,100 jobs and by SCDC of 22,000 jobs do provide a sound basis for forward planning. For this reason, **CambridgePPF is exploring a Statement of Common Ground with both Councils covering Employment Provision.**

- 2.2 The assessment method used by both Councils depends largely on a top-down disaggregation of sectoral employment forecasts for the East of England, teasing out the element that relates to the Cambridge Sub-Region. Clearly this approach lacks the sensitivity of a bottom-up component based on the projections and expectations of businesses already in the Cambridge area. However, even this would miss out on re-locations and new start-ups, so no method can be perfect. It is however to be hoped that by 2019 when the Combined Authority commences its preparation of a new Local Plan for the Cambridge Sub-Region, a more comprehensive assessment incorporating both top-down and bottom-up will be available to inform the planning process.
- 2.3 In the meanwhile, CambridgePPF believes that the projections in the submitted plans are realistic. Although we have conducted no data gathering research ourselves, we say this based largely on the extrapolation of post-recession rates of economic recovery over the next decade, and our personal knowledge of the Cambridge situation. The University of Cambridge's growth requirements for employment space, which were a major driver of the expansion plans in the 2006 Local Plan, will for the time-being be satisfied by North-West Cambridge, so we are looking at the need for commercial space from the private sector. This will depend largely on the number and size of companies wishing to locate into the Cambridge area and the ability of both Councils to control such growth. We believe that both Councils should apply strict criteria for companies wishing to re-locate into the Sub-Region so that they must demonstrate a compelling rationale as to why they needed to be in the Cambridge area and how they will support the Cambridge Cluster. With this important proviso, we believe the projections are sound.
- 2.4 We are aware of the considerable demands for the upward revision of the Councils' projections by those with a commercial interest in such development. However, despite the number of **Omission Sites**, we have yet to see any comprehensive independent research to demonstrate that the employment provisions in the submitted plans are not sound. There is extensive anecdotal or subjective opinion that Cambridge's growth is being restricted by the lack of commercial and research space, particularly incubation and growing-on facilities, yet the many satellite science parks and business parks around Cambridge still have spare capacity. The fact that landowners and developers are keen to build does not necessarily mean that additional employment space is actually needed. Demand does not automatically equate with need, as need must be tempered with what can be absorbed by the infrastructure and what is sustainable. We urge that the pressure for an upward revision of the provision to satisfy demand is resisted as over-development risks jeopardising what makes Cambridge so special to all of us.
- 2.5 CambridgePPF supports the concentration of employment growth in the six key locations within the city (CCC Para 2.39) but has serious reservations about the release of GB3 and GB4 from the Green Belt. In our opinion, the exceptional circumstances required by the NPPF have not been adequately demonstrated. If development of these sites does go ahead, it is particularly important that only companies that meet the selection criteria and make a manifest contribution to the Cambridge Cluster are located on this site.
- 2.6 The key development area over the next two decades is going to be the Cambridge Northern Fringe (East), which is served by the proposed Science Park railway station and Guided Busway extension (CCC Policy 14 and SCDC Policy SS/4). If developed imaginatively and at a higher building density than the existing Science Park with less land wasted for surface car-parking, then a substantial proportion of the employment need can be satisfied by this Area of Major Change alone. Through its co-location with the Cambridge Science Park, the Cambridge Business

Park, and the St John's Innovation Park, this would create a major cluster on the North side of the city with excellent public transport. This sort of development should be undertaken before new sites in the city fringe in less appropriate locations are considered.

3. Modifications to the Submitted Plans

3.1 CambridgePPF would like to see the following modifications to the submitted plans:

CCC Plan:

- a) Clarification of the criteria to be adopted in screening companies wishing to locate to Cambridge to ensure they contribute to the Cambridge Cluster (Policy 2)
- b) Clarification of the exceptional circumstances required by the NPPF to justify the release of Green Belt land at GB3 and GB4 (Policy 2, Para 2.37 and Policy 4, Para 2.54)

4. Retail Provision:

- a) CambridgePPF does not have the expertise to comment on the adequacy of the proposed retail provision of an additional 14,141 sq m up to 2022. With the rise in internet shopping and big retail developments in cities like Peterborough and Huntingdon, expansion in retail capacity in Cambridge should be cautious.
- b) CambridgePPF supports the proposed hierarchy of centres
- c) CambridgePPF supports the priority given to the re-development of the Fitzroy/Burleigh Street/Grafton Primary Shopping Area which badly needs a face-lift: the linkage with the main shopping centre and the Grand Arcade also needs improving
- d) CambridgePPF supports the proposed sequential approach, and welcomes the threshold of 2,500 sq m for triggering an impact assessment on local shops
- e) CambridgePPF urges that special measures, possibly even including financial measures, should be given to supporting small local owner-occupied shops, which often are assets greatly valued by local communities. Cambridge has one of the highest proportions of its total retail provision serviced by the big national chains with a dearth of local shops.
- f) CambridgePPF believes that in Local Centres and Neighbourhood Centres, measures should be actively explored to safeguard local shops from the impact of larger stores. A maximum floor-space for shops might be considered to prevent the merger of adjacent properties to allow large supermarkets to drive out local shops. This was proposed at the retail workshop in April 2013 and should be included in the submitted plan.