

M11/SCDC&CCC



CAMBRIDGE
CITY COUNCIL



Examination into the Soundness of the
Cambridge Local Plan and South Cambridgeshire
Local Plan

Matter M11 – Joint Omission sites

Cambridge City Council and
South Cambridgeshire District Council

June 2017

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Matter M11: Joint Omission Sites

Statement by South Cambridgeshire District Council and Cambridge City Council

June 2017

Introduction

1. This statement sets out both Councils' response in relation to the Inspectors' Matter M11 relating to Joint Omission Sites.
2. All the documents referred to in this statement are listed in Appendix 1, and examination library document reference numbers are used throughout the statement for convenience.

Matter 11: Joint Omission Sites

Background

3. It is important that the approach to development on the edge of Cambridge is seen in the context of the wider development strategy for the Greater Cambridge area.
4. The current development strategy for the Greater Cambridge area in submitted Local Plans carries forward and builds on the sustainable development strategy contained in the Cambridgeshire and Peterborough Structure Plan (2003)¹ and East of England Plan (2008)², and incorporated into the Cambridge Local Plan (adopted 2006)³ and South Cambridgeshire Local Development Framework (adopted between 2007-2010)⁴. The strategy retains a Cambridge-focus; the development sequence maximises use of land within the urban area of Cambridge and on the edge of Cambridge compatible with protecting the Green Belt setting of the historic city, and then in new settlements linked to Cambridge by sustainable transport corridors and finally in the larger and more sustainable villages.
5. In order to inform decision making on the extent of land which could be released for development on the edge of Cambridge the Councils' published an Inner Green Belt Boundary Study in 2012⁵ which identified that the scope for a release of Green Belt land for development was limited. Technical assessments and Sustainability Appraisal (SA) resulted in six sites on the edge of Cambridge being identified as suitable for housing or employment without significant harm to the purposes of the Cambridge Green Belt and these were included in the submitted Local Plans.
6. The Council addressed the development strategy for Greater Cambridge in their joint statement to Matter 2: Overall Spatial Vision and General Issues (M2-CCC&SCDC) and Topic Paper – Joint Working and Development Strategy (2014) (RD/Top/010).
7. Following a series of examination hearings into various matters and issues including regarding the overall spatial vision and the Green Belt the Inspectors wrote to the

¹ Cambridgeshire and Peterborough Structure Plan 2003 (RD/AD/010)

² East of England Plan (2008) (RD/NP/130)

³ Cambridge Local Plan 2006 (RD/AD/300)

⁴ South Cambridgeshire Local Development Framework – RD/AD/100 – RD/AD/150, RD/AD/280, RD/AD/290

⁵ RD/Strat/210

Councils on the 20 May 2015⁶ regarding a number of matters including the overall development strategy, the appraisal of all reasonable alternatives (including sites on the urban edge), the methodology of the Cambridge Inner Green Belt Boundary Study 2012 and the infrastructure requirements and sustainable transport options for the new settlements. The examinations were suspended until March 2016 to allow a programme of work to be completed to address these concerns, including preparation of a Green Belt review, preparation of a Transport report, and preparation of an addendum to the SA, informing a review of the development strategy.

8. The additional work, including the Development Strategy Update⁷, and Sustainability Appraisal Addendum⁸, concluded that that the development strategy in the submitted plans remains a sound approach for the Greater Cambridge area and whilst recognising the locational sustainability merits of sites on the edge of Cambridge, these are outweighed by the extent of Green Belt harm to the purposes of the Cambridge Green Belt. The new Inner Green Belt Study 2015 reaches very similar conclusions to the Councils' 2012 study and modifications have been proposed in relation to two areas of land where a different conclusion is reached. Matter PM2 considered the methodology of the new Green Belt study. The key findings of this body of work are summarised below for each of the joint omission sites insofar as this is appropriate in each case.
9. The preferred development strategy of both Councils for Greater Cambridge included in the submission Local Plans and confirmed by the additional work and Development Strategy Update:
 - maximises development within the urban area of Cambridge focusing on previously developed land
 - includes the existing major developments on the edge of Cambridge identified in the adopted plans through previous Green Belt releases
 - releases limited land for development on the edge of Cambridge weighing in each case the sustainability merits of such locations with extent of harm to the purposes of the Cambridge Green Belt
 - focuses growth at new settlements on two key strategic growth corridors, supported by transport improvements to achieve sustainable high quality public transport and other infrastructure provision such as education, with potential to support longer term sustainable growth outside the Green Belt;
 - continues to limit the amount of new development in villages, whilst providing for new development focused at the more sustainable villages to provide some flexibility to meet local needs
 - supports the recycling of land at villages and schemes to meet local needs, with the scale of schemes guided by the rural settlement hierarchy.
10. It should be noted that this statement does not repeat matters and issues dealt with at previous examination hearings, nor would it be appropriate to do so, including in relation to overall strategy (Matter 2), housing need (Matter 3), employment and retail

⁶ RD/Gen/170

⁷ Development Strategy Update (RD/MC/060)

⁸ Cambridge and South Cambridgeshire Local Plans SA Addendum Report RD/MC/020 (November 2015), and its supplement from November 2016 RD/MC/021

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(Matter 4), supporting the Cambridge economy (Matter CC4), infrastructure and viability (Matter 5), transport (Matter 7), housing land supply and housing delivery (matter 8), building a strong and compleutive economy (Matter SC7), Green Belt and Green Belt review methodology (Matters 8 and PM2).

11. There is some repetition in regard to the wording of each of the following sites, particularly in respect if matters concerning the stages of plan preparation. This is intentional and is intended to allow each to be read as a coherent whole without a need to refer unnecessarily to extensive introductory text.

M11.1 Land west of Hauxton Road, Trumpington

M11.1i

Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?

Grosvenor / Wrenbridge represented by Deloitte LLP

South Cambridgeshire Reps:

59764 (Policy SC/4 for Meeting Community Needs, 9.17)

59908 (Policy S/4: Cambridge Green Belt)

Cambridge Reps:

27128 (Policy 73: Community, Sports and Leisure Facilities)

27129 (Policy 3: Spatial Strategy for the Location of Residential Development)

27132 (Site Specific Proposals, Policy 26: Site Specific Development Opportunities)

Summary of promoters' proposal

12. Land west of Hauxton Road, Trumpington and land at the Abbey Stadium, Cambridge should be allocated for a community football stadium, indoor and outdoor sports and residential development to fund delivery. Land west of Hauxton Road should be released from the Green Belt to accommodate residential development and built sports facilities. Land between the new Green Belt boundary and the M11 will provide for outdoor sport and ancillary features.
13. The omission site is shown on the map in Appendix 2.
14. The site was originally submitted to the Councils in response to their 'call for sites' when preparing their respective Strategic Housing Land Availability Assessments (SHLAA). Two alternative SHLAA submissions for the site were made in July 2011:
 - Site SC68⁹ (and CC914a¹⁰) - a further urban extension of the consented Trumpington Meadows residential community, for approximately 500 dwellings and associated landscape and drainage proposals, play spaces, community allotments, new woodland, additional meadow land, infrastructure, access, and parking.
 - Site SC69¹¹ (and CC914b¹²) - a further urban extension of the consented Trumpington Meadows residential community, for approximately 420 dwellings with additional sports facilities between the new urban edge and the M11 and a new Community Stadium, together forming the Cambridge Sporting Village development (including relocation of Cambridge United FC).

⁹ South Cambridgeshire Strategic Housing Land Availability Assessment (RD/Strat/120), pages 2446-2460

¹⁰ Cambridge Strategic Housing Land Availability Assessment (RD/Strat/140), pages 421-428

¹¹ South Cambridgeshire Strategic Housing Land Availability Assessment (RD/Strat/120), pages 2461-2475

¹² Cambridge Strategic Housing Land Availability Assessment (RD/Strat/140), pages 429-432

15. The promoter's proposal was amended in their later representations and an outline planning application was submitted in July 2016 for development of a sporting village comprising new sports facilities, community uses, leisure uses, retail and 520 residential units.

Issues and Options consultations 2012

16. The Councils' separate Issues and Options consultations both asked if any of ten broad locations around the edge of Cambridge had potential to be released from the Green Belt to provide new housing to meet housing needs¹³. Land west of Hauxton Road being broad location 4.
17. In summary the Issues and Options consultations resulted in the following representations¹⁴:

City: Support: 4, Object: 41
SCDC: Support: 7, Object: 50, Comment: 4

ARGUMENTS IN SUPPORT:

- There are exceptional circumstances;
- Would be a sustainable development with 10.49 Ha of outdoor sports pitches, 8.65 hectare extension to Trumpington Meadows Country park - a community stadium with a capacity of c8,000, indoor sports provision;
- Logical extension to City without compromising neighbouring necklace villages. M11 forms a natural Southern boundary;
- Could help meet development needs of Cambridge;
- Land already compromised by development;
- Well landscaped sensitive development acceptable;
- Good access;
- Minimal landscape impact.

OBJECTIONS:

- No exceptional case exists to justify more Green Belt development;
- No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages);
- New development would detract from the historic character of Cambridge;
- Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less
- Harmful;
- Development would conflict with the aim of having a "quality edge" on the southern approach to Cambridge;
- Loss of landscaped foreground to the new city edge;
- Highly visible site on rising ground;
- Coalescence with Hauxton / Harston;

¹³ Issues and Options Reports for both Local Plans June/July 2012 (SCDC RD/LP/030 page 43, CCC RD/LP/240 page 59)

¹⁴ Summary of Issues and Options 2012 comments on broad locations in the Green Belt.

RD/Sub/SC/060 - South Cambridgeshire Draft Final Sustainability Assessment (March 2014) Annex B, Site Assessments for edge of Cambridge Sites, Broad Location 4 from page B2212. RD/Sub/C/080 Cambridge City Council Statement of Consultation and Audit Trails, from page 780.

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- Development would adversely impact on the setting of the adjacent new country park, including Byrons Pool and the river;
- Community Stadium not appropriate in this sensitive gateway location;
- Involves loss of open space needed to form a positive southern boundary to the city, and buffer Trumpington Meadows from the motorway;
- Would erode the amenity value of the Trumpington Meadows country park;
- Inadequate water supply to support development;
- Could increase flood risk downstream;
- Would worsen traffic and make it harder to commute to work;
- Inadequate road infrastructure and capacity;
- Noise and air quality concerns close to M11;
- Noise from the stadium,
- Impact on local services and amenities including schools (Primary school at Trumpington Meadows incapable of extension);
- New retail should be in city centre;
- Allow new development to be completed and settled before more is contemplated.

COMMENTS

- Minor development acceptable;
- Broad Location 4 should include the WWTW at Bayer Cropscience;
- The Quarter to Six Quadrant should be preserved & enhanced.

Councils' Joint Issues & Options 2: Part 1 consultation 2013

18. A technical assessment of a range of sites was undertaken having regard to the comments submitted in response to the Issues & Options consultations in summer 2012 on the ten broad locations in the Green Belt on the edge of Cambridge. The sites assessed were those submitted to the Councils' as part of the 'call for sites' when preparing their respective SHLAAs and any land identified through the new Green Belt review as fulfilling Green Belt purposes to a lesser degree.
19. The omission site was considered through the joint combined Green Belt Site and Sustainability Appraisal Assessment Proforma¹⁵ (as sites SC068 and CC914a for 500 dwellings and SC69 and CC914b for the same site but with 420 dwellings and a Community Stadium as part of a sporting village). These sites were identified taking account of developer proposals following the SHLAA 'call for sites', as well as additional potential options. Where falling across district boundaries the sites were broken up into separate land parcels. A joint site testing proforma was developed for the purpose of testing edge of Cambridge sites. The criteria in the proforma took account the social, environmental and economic sustainability themes and objectives identified in the SA scoping reports of both Councils, as well as deliverability and developability of sites. It included a two stage assessment, where sites failing the first stage were rejected from further consideration as potential allocations (although the remainder of the assessment was completed for each site).

¹⁵ Issues and Options 2 Part 1 Joint Consultation on Development Strategy & Site Options on the edge of Cambridge January 2013, Technical Background Document Part 1 (RD/LP/170 pages 281 to 341, maps included)

20. The main planning constraints and adverse impacts identified were:
 - Very significant impact on Green Belt purposes
 - Distant from existing services and facilities
 - Poor transport accessibility in City context but good accessibility in South Cambridgeshire context
 - Close to M11 and Hauxton Road, air quality and noise concerns over part of the site due to proximity to the M11
21. The Green Belt appraisals in the assessment proformas were informed by two studies, the Cambridge Inner Green Belt Boundary Study 2012¹⁶ and the Cambridge Green Belt Study 2002¹⁷.
22. These sites were assessed as having no significant development potential (significant constraints and adverse impacts – scored Red).
23. At this Issues and Options stage the Councils sought views on the need for a community stadium. They also considered the potential of 9 site options. The consultation made clear that, ‘There are major issues associated with all site options and this may mean that some sites may not be capable of being delivered. However, it is considered appropriate to consult on these options at this stage in the process before any decisions are taken on whether a community stadium should be provided and if so where.’¹⁸ The Councils included the whole site as a potential community stadium site option (Site option CS5 Land south of Trumpington Meadows, Hauxton Road, Cambridge)¹⁹.
24. In summary the Joint Issues and Options 2 consultation resulted in the following representations in relation to the community stadium option²⁰:
Support: 291, Object 93 and a petition with 900 signatures, Comment 20

Key issues in representations were:

SUPPORT:

- Good transport and road access,
- Would bring sporting and community benefits,
- Loss of Green Belt justified;
- Available (specific proposal submitted)

OBJECT:

- Traffic Congestion and Parking;
- Inadequate infrastructure and public transport;
- Green Belt impact, Visual impact and harm to the edge of the City; Biodiversity impact;

¹⁶ RD/Strat/210 Sector 7

¹⁷ RD/Strat/180

¹⁸ Issues and Options 2 Part 1 Joint Consultation on Development Strategy & Site Options on the edge of Cambridge January 2013 (RD/LP/150) paragraph 10.9

¹⁹ RD/LP/150 site option CS5 page 80

²⁰ RD/Sub/SC/060 Draft Final Sustainability Assessment (March 2014) Annex A Local Plan Chapter 9 pages A822 and page A826

- Conditional on development of 400 additional homes.
25. The site promoter submitted representations in support of this site option.
26. The Councils' assessment of the results of consultation²¹ concluded that the need for the community stadium had not been demonstrated. It also concluded that the development of this site would have a severe adverse impact on the setting of Cambridge, and on the purposes of Green Belt in terms of its openness and setting of the City. There was a lack of adequate transport evidence and there was no viability evidence submitted to justify why 400 new dwellings were needed to make a Community Stadium viable.

Proposed Submission Local Plans 2013

27. The site was not included in either the Cambridge or South Cambridgeshire Proposed Submission Local Plans.

Representations Received on Proposed Submission Local Plans

28. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plans. The site promoter raised the following issues in their representations (South Cambridgeshire Rep 59764, Cambridge Rep 27128). Key reasons for objection were:
- The plan, along with that for Cambridge City, fails to respond to the evidence base and sporting needs of Cambridge and its immediate hinterland.
 - Land west of Hauxton Road, Trumpington and at the Abbey Stadium, Newmarket Road, should be allocated for a community football stadium, indoor and outdoor sports and enabling residential development to fund delivery. Approximately 15 hectares of land west of Hauxton Road should be released from the Green Belt to accommodate residential development and built sports facilities. Land between the new Green Belt boundary and the M11 will provide for outdoor sport and ancillary features.
29. The site promoter raised the following additional issues in their representation to the South Cambridgeshire Local Plan (Rep 59908). Key reasons for objection were:
- Land at Trumpington can be released without significant detriment to Green Belt purposes.
 - Development at Trumpington would also deliver significant community gains through the delivery of the Cambridge Sporting Village.
 - Grosvenor Estates appended a Cambridge Green Belt review document by Terence O'Rourke Ltd.
30. The site promoter raised the following key issues in their representations to the Cambridge Local Plan (Rep 27129). Key reasons for objection were:
- The plan is unsound in its assessment of, and approach to, housing needs and in relation to its strategy for the location of residential development. The plan

²¹ RD/Sub/SC/060 Draft Final Sustainability Assessment (March 2014) Annex A Audit Trail Local Plan Chapter 9 from page A818 and particularly pages A827 to A830 and RD/Sub/C/080 Cambridge City Council Statement of Consultation and Audit Trails, pages 570-582.

- does not respond to the evidence base and will not meet the objectives of the NPPF nor the local plan itself.
- The strategy is not sustainable.
 - The plan does not look beyond 2031 and hence does not comply with the NPPF.
31. They also raised a further issue in relation to the Cambridge Local Plan (Rep 27132). Key reasons for objection were:
- The allocation (at GB1) will have significant effects on Green Belt purposes. Delete land north of Wort's Causeway and replace with allocation of land west of Hauxton Road, Trumpington and at the Abbey Stadium, Newmarket Road for the delivery of a community football stadium, indoor and outdoor sports facilities and enabling residential development.
32. The Councils considered the representations, but did not consider that the site needed to be included in the Proposed Submission Plans to make the plans sound²².

Submitted Local Plans March 2014

33. The site was not included in the submitted Cambridge or South Cambridgeshire Local Plans.

Consideration since the Local Plans were Submitted

Local Plan hearings

34. Matters and issues relevant to Land West of Hauxton Road have been considered at previous examination hearings. The Councils have prepared statements in response to all of these Matters and Issues including regarding the need for the stadium at the Matter CC5 Hearing in September 2016 and Matter SC8 Hearing in November 2016.

Inspector's letter 20th May 2015

35. The Inspectors wrote to the Councils on 20th May 2015²³ with concerns regarding a number of matters including the overall development strategy, the appraisal of all reasonable alternatives (including sites on the edge of Cambridge), the methodology of the Cambridge Inner Green Belt Boundary Study 2012 and the infrastructure requirements and sustainable transport options for the new settlements. In June 2015²⁴ the Councils wrote to the Inspectors setting out a programme of work to address these concerns including preparation of a Green Belt review, preparation of a Transport report, and preparation of an addendum to the SA, informing a review of

²² South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 8 Responding to Proposed Submission Representations on Sites not Included in the Plan, pages A1612-A1613 AND Cambridge Full Council Committee Report 13 February 2014 (RD/CR/450)

²³ RD/Gen/170

²⁴ RD/Gen/180

the development strategy. In July 2015²⁵ the Inspectors formally suspended the examinations until March 2016.

Cambridge Inner Green Belt Boundary Study. November 2015

36. The Inspectors' letter raised questions about the methodology of the Cambridge Inner Green Belt Boundary Study 2012. In response the Councils commissioned a new assessment of the Inner Green Belt Boundary by LDA Design²⁶. The methodology of the study was examined at the Matter PM2 hearings in June 2016.
37. The Green Belt Study 2015 identified this area as sector 7.1. The supplement to the study amends the main study in respect of sector 7 regarding the Land West of Hauxton Road, creating a new sub-sector 7.2 for the area of arable land²⁷. It identifies that, following consideration of representations, as there are some slight differences between the area laid out as a country park and that returned to agricultural use, it is proposed to divide the sector into two sub areas. An amended version of Figure 2, showing the sub areas was included, along with amendments to the assessment of sector 7.
38. The supplement notes on pages 9-10:

Importance of the sector to Green Belt purposes

This sector plays a key role in the setting of the south west of Cambridge, ensuring that the expansion of the city does not continue unchecked and that the historic core remains large in comparison to the size of the city. It retains open countryside close to the expanding edge of the city and sub area 7.2 in particular prevents the sprawl of built development as far as the M11, retaining the distinctive separation between the edge of the city and the M11. As the hedgerow and woodland planting establishes within sub area 7.2, the rural character of this part of the sector will strengthen. The sub area is also important to the character of the approach to Cambridge along Hauxton Road and the visibility of the distinctive gateway to the city that is being created at Glebe Farm/Trumpington Meadows. Sub area 7.1 is important to the separation of Grantchester from Cambridge and part of the sub area lies within the River Cam green corridor.

Implications of Green Belt release for development

It is unlikely that any development within this sector could be accommodated without substantial harm to the Green Belt purposes. Development within the sector, particularly in sub area 7.2, would remove or reduce the distinctive separation between the edge of the city and the M11 and would affect the well designed and distinctive gateway to the city that is being created at Glebe Farm/Trumpington Meadows. Development within sub area 7.1 would also encroach on the green corridor along the River Cam and reduce the

²⁵ RD/Gen/200

²⁶ Cambridge Inner Green Belt Study 2015 (RD/MC/030) pages 110-114

²⁷ Cambridge Inner Green Belt Boundary Study (November 2015) Supplement – March 2016.

RD/MC/031, Item 2 pages 3-10

separation between Cambridge and Grantchester. No Green Belt release should be contemplated in this sector.

Cambridge and South Cambridgeshire Local Plans Transport Report²⁸

39. The Local Plan Examination Inspectors' Preliminary Conclusions (20 May 2015) sought to ensure that the sustainability implications of different development strategy options had been fully considered, including comparisons of strategy options which include development on the edge of Cambridge. It also stated that if development is to be directed to new settlements rather than the edge of the urban area, that the challenges of making such development as sustainable as possible have been addressed, in particular infrastructure requirements and sustainable transport options.
40. In response to the Inspector's letter, the Council prepared a suite of new evidence, including a new consolidated Modelling Report / Local Plan Transport Assessment. This included modelling to compare different strategy options, including significant edge of Cambridge focused options with new settlement or village focused strategies.
41. The Phase 2 2015 model runs included a south radial focus (option 5)²⁹ incorporating the representor's proposal. In order to consider the transport impact of development strategy option 5, this resulted in a package of mitigation measures being identified³⁰. For the Land West of Hauxton Road proposal, this included access arrangements in the do minimum option, and highway measures, public transport, walking and cycling improvements in the do-something.
42. The edge of Cambridge major development areas tested in the options, including option 5, showed higher mode shares for active travel modes than new settlements or villages to Cambridge³¹. However, the overall difference in the number of vehicle trips generated by the different strategy options tested was less marked, with a broad level of consistency in level of forecast traffic growth in each of the phase 2 development scenarios³².

Sustainability Appraisal Addendum Report and Supplement (Addendum November 2015 / Supplement March 2016)³³

²⁸ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070)

²⁹ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070)
table 5-1 Page 44, and figure 5-4 page 46

³⁰ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070)
table B.3 Page 87

³¹ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070)
figure 5-11 Page 54

³² Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070)
para 5.68 page 56

³³ Cambridge and South Cambridgeshire Local Plans SA Addendum Report RD/MC/020 (November 2015), and its supplement from November 2016 RD/MC/021 Annex 1 part 2 page 241 (combined site assessment site reference CCSC1003).

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43. The Councils prepared an SA Addendum Report that takes account of the additional evidence that has been undertaken in response to the Inspectors' concerns. All sites throughout the development sequence are assessed in a consistent way.
44. An updated Sustainability Appraisal Assessment Proforma of the site is included in the Cambridge and South Cambridgeshire Local Plans SA Addendum Report (November 2015/March 2016). The assessment (site reference CCSC1003) finds that development of the site would have a very significant negative impact on Green Belt purposes, and significant negative impacts on landscape and townscape.
45. The SA Addendum Report assessed the potential of this site (site reference CCSC1003) to accommodate 500 dwellings and associated infrastructure, including a sports hub building, cyclopark, hockey pitches, 3G artificial pitches, grass pitches for Cambridge Utd training. Some of the key issues identified in the SA Addendum Report for this site are set out below:
 - **Air Quality:** Site adjoins the M11 and A1309 which already experience poor air quality.
 - **Noise:** The site lies close to the M11 and while residential development could be acceptable, a high level of transport noise mitigation would be required: combination of appropriate distance separation, careful orientation / positioning / design / internal layout of buildings, noise insulation scheme and extensive noise attenuation measures to mitigate traffic noise (single aspect, limited height, sealed non-openable windows on façade facing M11 / , acoustically treated alternative ventilation, no open amenity spaces such as balconies / gardens).
 - **Biodiversity:** This parcel of land has been specifically set-a-side to mitigate the adjacent residential development of Trumpington Meadows. Farmland species including large flocks of golden plover, common toad, brown hares and skylark would be lost. Opportunity for habitat linkage/enhancement/restoration by attenuation measures.
 - **Green Belt:** Very high and high impacts on Greenbelt purposes (very significant negative impact).
 - **Heritage:** The northern boundary lies close to a Romano-British settlement scheduled monument. Impacts are considered to be capable of mitigation. Non-statutory archaeological site - Excavations in advance of development to the north have identified extensive evidence for Neolithic, Iron Age, Roman and Saxon activity.
 - **Open Space:** The development would create the opportunity to deliver significantly enhanced provision of new public open spaces in excess of adopted plan standards.
Developer proposal indicates a sports hub building on the 15 ha built site, cyclopark, hockey pitches, 3G artificial pitches, grass pitches for Cambridge Utd training. Sports hub building includes indoor artificial grass pitch, changing facilities, gym and fitness suite, and a café/restaurant.
Provision for Cambridge United Youth and Community Trust.
 - **Transport:** The site scores well against the sustainable transport score for South Cambridgeshire, which measures access to and quality of public transport and cycling.
46. Appendix 10 of the SA Addendum Report from page 253 shows how the Council has addressed representations from the site promoter regarding the proforma

assessment of this site. No changes to the proforma assessment scores were found to be justified.

47. The overall conclusion of the SA assessment in regard to the sustainability of different development locations are summarised in paragraph 5.4.3 as follows:

"The assessment concludes that the most sustainable level of the development sequence is within Cambridge. Development will have many sustainability benefits including protecting the distinctive setting of Cambridge through safeguarding the Green Belt and the associated biodiversity of the Green Belt". "With regard to the edge of Cambridge, the assessment has confirmed that there are sustainability benefits to development on the edge of Cambridge. With regard to transport, development on the edge of Cambridge remains the best performing option with regard to modal share and performs positively due to short distances to the city, low public transport journey times, and in many cases proximity to high frequency public transport. However, the modal share results hide the fact that these locations are in already congested areas of the city where there is little scope to create more capacity for more cars, forcing new trips to be undertaken by active modes. The Local Plans CSRM report shows that different development options do not result in radically different levels of traffic growth, travel times or delay. Whilst there are variations, these are in the context of very high overall traffic growth where significant amounts of development are already committed. Viability evidence has confirmed that sites on the edge of Cambridge do offer higher sales values than options further from the city meaning facilities and infrastructure are more viable. This offers benefits in terms of potential to secure higher funding through Community Infrastructure Levy (CIL) / Section 106. Cambridge is proposing to secure a higher rate of CIL than South Cambridgeshire, and this higher rate has the potential to be applied to edge of Cambridge sites. However, the Cambridge Inner Green Belt Boundary Study (2015) has concluded that it is unlikely that any development within identified sectors (apart from a few small exceptions) could be accommodated without substantial harm to the Green Belt purposes. Therefore, the conclusions remain that, notwithstanding some of the positive sustainability effects that development on the edge of Cambridge demonstrates, it would not be possible to deliver significant additional development here without significant detriment to the specific purposes of the Cambridge Green Belt".

48. The paragraph also looks at new settlements and village sites.
49. At paragraph 9.4 the report sets out the reason for selection of the preferred strategy to the location of development set out in the Local Plans as follows:

"The Councils acknowledge the advantages of edge of Cambridge sites in terms of accessibility to jobs and services in the urban area. The Councils have also taken account of the constraint imposed by the purposes of the Cambridge Green Belt and the level of harm that large developments within the currently designated Green Belt would have. However, this factor itself has been balanced against the need to promote sustainable patterns of development and the consequences of channelling development to locations outside the Green Belt.

Consideration of sustainability must take account of the full range of economic, social and environmental issues. NPPF paragraph 152 requires Local Planning Authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

The site was not included in the submitted South Cambridgeshire Local Plan. In the context of all evidence now available, the Councils have considered the merits of edge of Cambridge sites and the locational advantages they offer, against the significant harm that would be caused by substantial development on the edge of Cambridge to the purposes of the Cambridge Green Belt. Additional new settlements offer sufficient benefits in terms of critical mass, services and facilities and opportunities to deliver high quality transport improvements. The Councils consider that the need for jobs and homes could in principle provide a justification for review of the green belt boundary. However whether in fact such a release is appropriate involves balancing other consideration including impact of release on the purpose of the Cambridge green belt, the accessibility advantages of locating development on the edge of the urban area and reasonable alternatives. The result of this balancing exercise has led the Councils to conclude that only small scale green belt released at locations where harm to the purposes of the green belt designation would be appropriate".

Cambridge and South Cambridgeshire Development Strategy Update³⁴

50. This document describes the key evidence documents related to the alternative development strategies, and provides a summary of key issues in relation to each stage of the development sequence. It summarises the role of sustainability appraisal in the plan making process, and key findings in relation to the development sequence
51. Drawing on the evidence base, it then considers in Section 3 the consequences and issues related to the strategic choices available to the Council, including the consideration of sustainable patterns of development (as required by NPPF paragraphs 84 and 85) in the context of an area with a tightly drawn Green Belt around the historic city of Cambridge. It identifies the reasons for the preferred approach of the Councils in the submitted plans and having considered the issue afresh, taking account of the additional work undertaken. It concludes that the Councils have carried out or commissioned new studies to review the evidence on objectively assessed housing needs, Green Belt, transport, infrastructure and viability to ensure that the decision on the preferred strategy is based on a full understanding of the implications of the different strategy options. An addendum to the Sustainability Appraisal has also been carried out to ensure that the sustainability issues of the options available to the Councils are understood, in particular of land on the edge of Cambridge and at new settlements.

³⁴ Cambridge and South Cambridgeshire Development Strategy Update RD/MC/060

52. The Councils have been clear that they recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation, although it makes clear that major new development on the edge of Cambridge on congested radial routes have their own transport issues and are not necessarily cheap to deliver³⁵. The independent Green Belt evidence supports the findings of the Councils' own evidence that the release of land on the edge of Cambridge can be expected to compromise substantially the purposes of the Cambridge Green Belt, with two exceptions. One to reduce the size of an allocation in the submitted South Cambridgeshire Local Plan and one to allocate a new employment allocation as an extension to the Cambridge Biomedical Campus.
53. The evidence also looks at the potential to deliver sustainable new settlements, as an alternative to sites on the edge of Cambridge. It concludes that they can provide viable and deliverable developments, that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, that will attract significant levels of patronage and also provide wider benefits to existing communities. The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.
54. Having weighed all those factors, the Councils maintain their view that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period. The strategy will provide a range of deliverable sites for the plan period and beyond, and the Councils consider that sustainability will be secured.

Current planning application

55. On 22nd July 2016, an outline planning (large major) application (ref. S/1925/16/OL) was submitted to South Cambs District Council by Trumpington Meadows Land Company. The proposal for the site is a phased development of a Sporting Village comprising new sports facilities, Community uses (Use Class D1), Leisure uses (Use Class D2), Retail (Use Class A1/A3/A4) and residential development (Use Class C3) for 520 residential units, new landscaping and public realm, car and cycle parking, other associated works, and access from Hauxton Road.
56. As of May 2017, the planning application is still being assessed by the case officer. Whilst the planning application is not before the Local Plan examinations, it is appropriate to take account of any relevant matters arising through the consideration of the planning application. A letter was sent from the Council to the applicants on 23 November 2016 drawing the attention of the applicants to a number of fundamental and other issues of concern which is attached as Appendix 3 to this statement. In the letter the Councils indicate that they do not accept that a case has been made that very special circumstances exist to justify development in the Green Belt, identifies that there are significant transport concerns, identifies that there is inadequate secondary school capacity available locally and that ambient traffic noise levels are

³⁵ See for example paragraph 22 of the Council's Matter 7 Transport statement M7/ CCC & SCDC

such that the sustainability and overall environmental quality of the development would be compromised. The majority of dwellings would require mechanical ventilation, noise levels in gardens would be at the upper limit of acceptability and recreational and open areas closer to the M11 would suffer from even higher noise levels.

Assessment and Conclusion

57. It is not necessary to allocate this site to make the plan sound. It has been demonstrated through the plan making process that there are better alternatives available to meet development needs.
58. The SHLAA (including the combined Green Belt Site and Sustainability Appraisal Assessment Proforma) and SA provide a robust assessment of the site and comparison with alternatives subject to the considerations set out in this statement.
59. A number of criticisms of the November 2015 Inner Green Belt Boundary study were made by the promoter of this site in response to the proposed Modifications consultation (Reps 66109, 66110, 66111, and 66112). Whilst methodological concerns were primarily addressed at the PM2 Green Belt Review Methodology hearing in June 2016 a number of closely related site specific concerns were also made to the effect that the assessment of sector 7 in the study is not appropriate. Part of the Councils' response to these concerns was to issue the March 2016 supplement to the study RD/MC/031, which provided a sub-division to the assessment sector.
60. The objection by Grosvenor Developments suggests that there is a contradiction within the assessment of sector 7, whereby the conclusions indicate the sector is important to the character of the approach to Cambridge, but the assessment under criterion 3 states that there is little contribution to the approach to the historic core. This is a misunderstanding, as the approach to the historic core is not coincidental with the approach to the city as a whole in the vicinity of sector 7³⁶.
61. The objection queries the conclusion of the assessment of sector 7 that it ensures the expansion of the city does not continue unchecked and that the historic core remains large in comparison to the size of the city. The assessment of criteria 1, 2 and 3 in particular address why this is important for sector 7, with development to the south west of the city historically having been relatively limited, unlike other areas referenced by Grosvenor.
62. In relation to the assessment of criterion 12, the assessment is factual in that sector 7 forms part of the physical separation between Cambridge and the villages of Grantchester and Hauxton. The development at Trumpington Meadows, Glebe Farm and Clay Farm has extended the edge of Cambridge since many of the previous studies. The reference to separation between the M11 and the edge of the city within the LDA Design Study relates to the setting of the city, rather than relating to the prevention of settlements merging.

³⁶ Proposed Modifications Report on Consultation March 2016 (RD/MC/120) page A115

63. On the basis of the Green Belt assessments, the Councils consider that the development of the site would have a very significant negative impact on Green Belt purposes. It is also considered that there would be a significant impact on landscape and townscape, and the proposal would not be sustainable in regard to transport impacts, education capacity impacts, and with respect to environmental quality in regard to noise, as summarised in the Councils' letter in relation to the current planning application (Appendix 3). The locational advantages of large scale development on the edge of Cambridge are not considered to outweigh the negative impacts on the purposes of the Cambridge Green Belt taking account of reasonable alternatives.

64. The SA site appraisal³⁷ indicates that,

'The promoter has commented that the development would be accessed and serviced off the primary street through Trumpington Meadows, and that the northern and southern junctions onto Hauxton Road can, if necessary, be modified to provide sufficient capacity to accommodate the additional dwellings. County Highways have commented that access onto Hauxton Road would not be permitted. Any application would need to demonstrate that the northern and southern junctions can, after necessary modification accommodate additional traffic. A full transport assessment would be required to accompany any application including a residential travel plan, junction modelling of the area to assess network capacity and appropriate mitigation, including impact on public transport journey times and capacity. Significant congestion already occurs in this quadrant of Cambridge which is likely to be exacerbated by the full build out of the planned and approved southern fringe residential and CBC developments. As such, while significant infrastructure has already been introduced in this quadrant (AAR, M11 junction improvement works, CGB, CGB cycle track), any TA will need to carefully examine and clearly demonstrate how the site can be delivered without having an unacceptable impact on the surrounding transport networks. The Highways Agency advice is that sites clustered around M11 J11 while being fairly well integrated with Cambridge are likely to result in some additional pressure on the M11 corridor, though this is probably mitigable (subject to a suitable assessment).'

65. Whilst the planning application is not before the Examination, it should be noted that the proposal has been subject to an objection from the Local Highways Authority, for reasons included in a letter from the Council to the promoters of 23 November 2016 (see Appendix 3).
66. Issues regarding the need for a community stadium were addressed in the Councils' Matter Statements to South Cambridgeshire Matter SC8, and Cambridge Matter CC5. Cambridge City Council and South Cambridgeshire District Council do not consider that objective, up to date evidence of need for a community stadium has been demonstrated. Since the submission of the Local Plans the Councils have prepared

³⁷ Sustainability Appraisal Addendum Report (RD/MC/021). Annex 1 Part 2 Site CCSC1003 on pages 241-251 (Access is addressed on page 250)

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two sports strategies: a Playing Pitch Strategy 2015-2031³⁸ and an Indoor Sports Facility Strategy 2015-2031³⁹. Both strategies do not identify a need for the provision of a community stadium to address the needs identified.

67. The site is not required to meet the objectively assessed need for homes in the plan period. The site does not need to be allocated to make the plan sound.

³⁸ Playing Pitch Strategy 2015-2031 (RD/CSF/190)

³⁹ Indoor Sports Facility Strategy 2015-2031 (RD/CSF/200)

Matter M11.2 Cambridge South

M11.2i

Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?

Pigeon Land represented by CodeDP

Cambridge Reps:

27586 (Policy 2 Spatial Strategy to 2031)

South Cambridgeshire Reps:

59556 (Policy S/4 Cambridge Green Belt)
59921 (Policy E/9 Promotion of Clusters)

Summary of promoters' proposal

68. The site is proposed for an employment led mixed use development comprising a 85,000 sq m science park on 45 ha of land, 1,250 dwellings, neighbourhood shops and community facilities, a new primary school, public open space, strategic landscaping, and highways and other supporting infrastructure.
69. The omission site is shown on the map in Appendix 2.
70. The site was originally submitted to the Councils in response to their 'call for sites' when preparing their respective Strategic Housing Land Availability Assessments (SHLAA). The SHLAA submission for the site made in July 2011 was for 2,500 dwellings as part of a mixed use sustainable extension to Cambridge including employment, community facilities and retail.

Issues and Options consultations 2012

71. The Councils' separate consultations both asked if any of ten broad locations around the edge of Cambridge had potential to be released from the Green Belt to provide new housing to meet housing needs⁴⁰. Cambridge South being broad location 5.
72. In summary the Issues and Options consultations resulted in the following representations⁴¹

City: Support: 7, Object: 30
SCDC: Support: 9, Object: 43, Comment: 5
Note: The site promoter's representations reduced the dwelling capacity of the site and included provision for a large new Science Park.

⁴⁰ Issues and Options Reports for both Local Plans June/July 2012 (SCDC RD/LP/030 page 43, CCC RD/LP/240 page 59)

⁴¹ RD/Sub/SC/060 Draft Final Sustainability Assessment (March 2014) Annex B, Site Assessments for edge of Cambridge sites, Broad location 5 from page B2574 and RD/Sub/C/080 Cambridge City Council Statement of Consultation and Audit Trails, from page 782. Summary of Issues and Options 2012 comments on broad locations in the Green Belt.

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ARGUMENTS IN SUPPORT:

- Logical extension to City without compromising neighbouring necklace villages. M11 forms a natural Southern boundary;
- Would provide a employment-led, mixed-use neighbourhood in a sustainable location with 45 hectares of office/research and employment development (science park), 1,250 market, affordable and key worker dwellings, local shops and community facilities, a primary school, public open space, strategic landscaping, highways and other supporting infrastructure;
- Could help meet development needs of Cambridge;
- Would assist the delivery of high levels of employment growth in Cambridge;
- Sustainable location high in development sequence established by 2003 Structure Plan;
- Good transport network nearby;
- Site is available and can be delivered in plan period;
- Land already compromised by development, would not harm Green Belt purposes;
- Well landscaped sensitive development acceptable;
- Would allow for enhancement of nearby habitats and increased access to the countryside;
- Yes, provided views maintained and clear separation between development and Great Shelford;
- Potential for major growth which has little impact on character / townscape and landscape setting of city.

OBJECTIONS:

- No exceptional case exists to justify more Green Belt development;
- No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages);
- Allow new development to be completed and settled before more is contemplated, area is already overdeveloped;
- Planning inspectors have ruled Addenbrooke's Road is a sensible Green Belt boundary;
- New development would detract from the historic character of Cambridge;
- Would compromise planned Green Belt edge on Glebe Road;
- Development south of Glebe Road rejected in earlier plans and nothing has changed since then;
- Would lead to ribbon development;
- Would lead to coalescence with Great Shelford;
- Harmful impact on views of Cambridge from the Gogs;
- Inadequate road infrastructure and capacity;
- Inadequate local school places, services and facilities;
- Would worsen traffic and slow ambulances going to Addenbrooke's Hospital;
- Noise and air quality concerns close to M11;
- Loss of amenity, open spaces and land for walking;
- Could increase flood risk downstream.

COMMENTS:

- Not as intrusive as other options
- Minor development on non-elevated land would be acceptable
- Not too bad, plenty of new housing going on nearby and decent roads

- The southern limit of this site would need to be defined with care. If extended too far to the south it could swamp Great Shelford.
- This is the better of the options, as it continues on from existing developments. However, it could cause congestion and the transport infrastructure would need to be improved to cope

Councils' Joint Issues & Options 2: Part 1 consultation 2013

73. A technical assessment of a range of sites was undertaken having regard to the comments submitted in response to the Issues & Options consultations in summer 2012 on the ten broad locations in the Green Belt on the edge of Cambridge. The sites assessed were those submitted to the Councils' as part of the 'call for sites' when preparing their respective SHLAAs and any land identified through the new Green Belt review as fulfilling Green Belt purposes to a lesser degree.
74. The omission site was considered through the joint combined Green Belt Site and Sustainability Appraisal Assessment Proforma⁴² (as sites SC105 and CC904, sites CC878, SC294 and SC295 are for parts of site SC105)⁴³. These sites were identified taking account of developer proposals following the SHLAA 'call for sites', as well as additional potential options. Where falling across district boundaries the sites were broken up into separate land parcels. A joint site testing proforma was developed for the purpose of testing edge of Cambridge sites. The criteria in the proforma took into account the social, environmental and economic sustainability themes and objectives identified in the SA scoping reports of both Councils, as well as deliverability and developability of sites. It included a two stage assessment, where sites failing the first stage were rejected from further consideration as potential allocations (although the remainder of the assessment was completed for each site).
75. The main planning constraints and adverse impacts identified were:

CC878 Land east of Hauxton Road	<ul style="list-style-type: none">• Very significant impact on Green Belt purposes• Distant from existing services and facilities• Poor transport accessibility in City context but very good accessibility in South Cambridgeshire context• Close to M11 and Hauxton Road, air quality and noise concerns over part of site due to proximity to M11
SC105 Land to the south of Addenbrooke's Access Road	<ul style="list-style-type: none">• Significant impact on Green Belt purposes• Could provide own services, facilities and schools• Poor transport accessibility in City context but good accessibility in South Cambridgeshire context• Close to M11 and Hauxton Road, air quality and noise concerns over part of site due to proximity to M11
CC904 Land east of Hauxton Road	<ul style="list-style-type: none">• Significant impact on Green Belt purposes• Distant from existing services and facilities• Distant from existing Primary School• Poor transport accessibility in City context but very good

⁴² Issues and Options 2 Part 1 Joint Consultation on Development Strategy & Site Options on the edge of Cambridge January 2013, Technical Background Document Part 1 (RD/LP/170 pages 357 to 413, but primarily 357 to 385, maps included)

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	accessibility in South Cambridgeshire context
SC294 Land east of Hauxton Road	<ul style="list-style-type: none"> • Adverse impact on Green Belt purposes • Inadequate vehicular access • Distant from existing services and facilities • Poor transport accessibility in City context but very good accessibility in South Cambridgeshire context
SC295 Land east of Hauxton Road	<ul style="list-style-type: none"> • Adverse impact on Green Belt purposes • Inadequate vehicular access • Distant from existing services and facilities • Poor public transport accessibility in City context but very good accessibility in South Cambridgeshire context

76. The Green Belt appraisals in the assessment proformas were informed by two studies, the Cambridge Inner Green Belt Boundary Study 2012⁴⁴ and the Cambridge Green Belt Study 2002⁴⁵.
77. The sites were assessed as having no significant development potential (significant constraints and adverse impacts - scored Red).
78. An objection was received from the site promoter to the Issues & Options 2: Part 1 consultation which is summarised in the South Cambridgeshire Draft Final Sustainability Appraisal Report⁴⁶ and Cambridge Statement of Consultation⁴⁷ as follows:

“Cambridge South Consortium - The consultation document is not sound as it is not based on objectively assessed needs, the draft plan is not justified – fundamental background technical work has not been carried out. The draft plan is not the most appropriate strategy-there has been no strategic assessment of development on the edge of Cambridge. Joint working has not addressed cross boundary delivery of housing and employment. The draft plan is not consistent with national policy. BL5, land south of Addenbrooke’s Road has been incorrectly assessed as a housing site despite reps to both council’s as part of Issues and Options One for an employment led scheme comprising a 45ha science park and 1,250 homes. This would have led to a better scoring of the site. The green belt and SA assessment included criteria such as views green corridors and soft green edges which are not relevant to SA and has resulted in double counting. They have commented further in the Green Belt Critique and Critique of Interim SA. The allocation for and employment led mixed use scheme will have a number of benefits. City can be expanded in a sustainable way, access to good public transport, employment, rail station, Addenbrooke’s. It would not harm the Green Belt. It would create jobs and benefit the economy, provide 1250 homes including 500 affordable homes to meet ongoing needs beyond 2021. Provide a new focus of R&D development to the south related to a new sustainable community. Would meet all NPPF sustainability objectives.”

⁴⁴ RD/Strat/210 Sector 8

⁴⁵ RD/Strat/180

⁴⁶ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 4, pages A1314-A1315

⁴⁷ Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080), page 793

79. The Councils' response to representations on rejected sites in broad location 5 (land south of Addenbrookes Road) is outlined in the South Cambridgeshire Draft Final Sustainability Appraisal Report⁴⁸ and Cambridge Development Plan Scrutiny Sub-Committee Report 29 May 2013⁴⁹.

Proposed Submission Local Plans 2013

80. The site was not included in either the Cambridge or South Cambridgeshire Proposed Submission Local Plans.

Representations Received on Proposed Submission Local Plans

81. The site promoter objected to the rejection of this site (including reps CCC 27586, SCDC 59556 and 59908).

82. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 59556 to Policy S/4). Key reasons for objection were:

- The Plan is not sound because the December 2012 Inner Green Belt Appraisal is flawed because no account was taken of the need to promote sustainable development and there are errors and inconsistencies. We have re-assessed the Cambridge South site using the same methodology, excluding the errors, and conclude that the importance of the site to the Green Belt is no greater than the importance of the Green Belt site (Fulbourn Road East) proposed to be allocated for employment.

83. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 59921 to Policy E/9). Key reasons for objection were:

- We object to the non-allocation of the Cambridge South site for an 85,000 sq m R&D led mixed use development under Policy E/9. We have re-assessed the Cambridge South site and the importance of the site to the Green Belt is no greater than the importance of the Green Belt site at Fulbourn Road East proposed to be allocated for employment.

84. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 27586 to Policy 2). Key reasons for objection were:

- The Memo of Co-operation seeks to export housing from Cambridge and South Cambridgeshire, which we consider to have the greatest need to; other Authorities within the Cambridgeshire HMA, which based upon historic

⁴⁸ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 4, pages A1321-A1323

⁴⁹ Development Plan Scrutiny Sub Committee Report 29 May 2013 - Cambridge Local Plan– Draft Local Plan Including The Preferred Approach To The Spatial Strategy, Vision And Objectives (RD/CR/380)

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completions will not be able to deliver the housing requirement and to Peterborough, which it is claimed has already provided 2,500 dwellings from the Cambridgeshire HMA.

- The Plan is not sound because the distribution in the Memo is unsustainable since it will increase the level of commuting to Cambridge and South Cambridgeshire, and because the 'receiving' Authorities will not be able to deliver such high housing numbers.
 - We consider that none of the constraints identified should restrict the level of growth in the City and prevent it from meeting its full objectively assessed employment and housing needs in the most sustainable way on the edge of the urban area. The identification of such constraints does not comply with the NPPF which aims to support growth and economic development and requires Local Planning Authorities to 'proactively drive and support' sustainable economic development. The constraints should not be used as a reason to restrict sustainable growth at the expense of the local, national and international economy.
85. The Councils considered the representations, but did not consider that the site needed to be included in the Proposed Submission Plans to make the plans sound⁵⁰.
- Submitted Local Plans 2014
86. The site was not included in the submitted Cambridge or South Cambridgeshire Local Plans.

Consideration since the Local Plans were Submitted

Local Plan hearings

87. Matters and issues relevant to Cambridge South have been considered at previous examination hearings. The Councils have prepared statements in response to all of these Matters and Issues including regarding the need for employment land on the edge of Cambridge at the Matter M4, CC4 and SC7 hearings between November 2014 and February 2017.

Inspector's letter 20th May 2015

88. The Inspectors wrote to the Councils on 20th May 2015⁵¹ with concerns regarding a number of matters including the overall development strategy, the appraisal of all reasonable alternatives (including sites on the edge of Cambridge), the methodology of the Cambridge Inner Green Belt Boundary Study 2012 and the infrastructure requirements and sustainable transport options for the new settlements. In June 2015⁵² the Councils wrote to the Inspectors setting out a programme of work to address these concerns including preparation of a Green Belt review, preparation of a

⁵⁰ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 8 Responding to Proposed Submission Representations on Sites not Included in the Plan, pages A1606-A1607 AND Cambridge Full Council Committee Report 13 February 2014 (RD/CR/450)

⁵¹ RD/Gen/170

⁵² RD/Gen/180

Transport report, and preparation of an addendum to the SA, informing a review of the development strategy. In July 2015⁵³ the Inspector's formally suspended the examinations until March 2016.

Cambridge Inner Green Belt Boundary Study (November 2015)⁵⁴

89. The Inspectors' letter raised questions about the methodology of the Cambridge Inner Green Belt Boundary Study 2012. In response the Councils commissioned a new assessment of the Inner Green Belt Boundary by LDA Design⁵⁵. The methodology of the study was examined at the Matter PM2 hearings in June 2016.
90. The study's conclusions regarding the Cambridge South site are set out as Sector 8 (and specifically as sub-area 8.1) from page 115. The study notes that the majority of sector 8 (specifically sub area 8.1) plays a key role in the setting of the south of Cambridge, ensuring that the expansion of the city does not continue unchecked and that the historic core remains large in comparison to the size of the city as a whole. It retains open countryside close to the expanding edge of the city and prevents the sprawl of built development as far as the M11, retaining the distinctive separation between the edge of the city and the M11 in contrast to the relationship with the A14 to the north of Cambridge. A distinctive gateway to the city is being created at Trumpington Meadows and Glebe Farm. Sub area 8.1 is also key in the separation between the edge of Cambridge and the necklace villages of Great Shelford, Hauxton and Little Shelford. I
91. It states that it is unlikely that any development within sub area 8.1 could be accommodated without substantial harm to the Green Belt purposes. Any form of development within sub area 8.1 would reduce the distinctive separation between the edge of the city and the M11 and would affect the well designed and distinctive gateway to the city that is being created at Glebe Farm / Trumpington Meadows. It would also significantly encroach on the separation between Cambridge and the necklace villages of Great Shelford, Hauxton and Little Shelford. No Green Belt release should be contemplated in sub area 8.1.

Cambridge and South Cambridgeshire Local Plans Transport Report⁵⁶

92. The Local Plan Examination Inspectors' Preliminary Conclusions (20 May 2015) sought to ensure that the sustainability implications of different development strategy options had been fully considered, including comparisons of strategy options which include development on the edge of Cambridge. It also stated that if development is to be directed to new settlements rather than the edge of the urban area, that the challenges of making such development as sustainable as possible have been addressed, in particular infrastructure requirements and sustainable transport options.

⁵³ RD/Gen/200

⁵⁴ Cambridge Inner Green Belt Boundary Study (RD/MC/030)

⁵⁵ Cambridge Inner Green Belt Study 2015 (RD/MC/030) pages 110-114

⁵⁶ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070)

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93. In response to the Inspector's letter, the Council prepared a suite of new evidence, including a new consolidated Modelling Report / Local Plan Transport Assessment. This included modelling to compare different strategy options, including significant edge of Cambridge focused options with new settlement or village focused strategies.
94. The Phase 2 2015 model runs included a south radial focus (option 5)⁵⁷ incorporating the representor's proposal. In order to consider the transport impact of development strategy option 5, this resulted in a package of mitigation measures being identified⁵⁸. For the Cambridge South proposal, this included access arrangements in the do minimum option, and highway measures, public transport, walking and cycling improvements in the do-something.
95. The edge of Cambridge major development areas tested in the options, including option 5, showed higher mode shares for active travel modes than new settlements or villages to Cambridge⁵⁹. However, the overall difference in the number of vehicle trips generated by the different strategy options tested was less marked, with a broad level of consistency in level of forecast traffic growth in each of the phase 2 development scenarios⁶⁰.

Sustainability Appraisal Addendum Report and Supplement (Addendum November 2015 / Supplement March 2016)⁶¹

96. The Councils prepared an SA Addendum Report that takes account of the additional evidence that has been undertaken in response to the Inspectors' concerns. All sites throughout the development sequence are assessed in a consistent way.
97. An updated Sustainability Appraisal Assessment Proforma of the site is included in the Cambridge and South Cambridgeshire Local Plans SA Addendum Report (November 2015/March 2016). The assessment finds that development of the site would have a significant negative impact on Green Belt purposes, landscape and townscape.
98. The SA addendum Report assessed the potential of this site (CCSC1004) to accommodate an employment-led mixed-use development comprising a 85,000 sqm Science Park and 1,250 homes, incorporating new local centre, primary school and open space. Some of the key issues identified in the SA Addendum Report for this site are set out below:

⁵⁷ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) table 5-1 Page 44, and figure 5-4 page 46

⁵⁸ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) table B.3 Page 87

⁵⁹ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) figure 5-11 Page 54

⁶⁰ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) para 5.68 page 56

⁶¹ Cambridge and South Cambridgeshire Local Plans SA Addendum Report RD/MC/020 (November 2015), and its supplement from November 2016 RD/MC/021 Annex 1 part 2 page 252 site CCSC1004

- **Noise:** the site lies close to the M11 and while residential development could be acceptable, a high level of transport noise mitigation would be required: combination of appropriate distance separation, careful orientation / positioning / design / internal layout of buildings, noise insulation scheme and extensive noise attenuation measures to mitigate traffic noise (single aspect, limited height, sealed non-openable windows on façade facing M11 / , acoustically treated alternative ventilation, no open amenity spaces such as balconies / gardens).
 - **Green Belt:** Significant negative impact on Greenbelt purposes
 - **Heritage:** A Scheduled Monument of national importance (SAM58 Neolithic to Roman settlement) is located in the south west corner of the site adjoining the M11 and the River Cam. County Archaeologists would object to the development of this site. Two further Scheduled Monuments lie approximately 200m south of the site. The promoter proposes a buffer zone to protect the SAM and on a site of this size it should be possible to provide appropriate mitigation.
- The Grade I Listed Church of St Mary, Little Shelford lies approximately 540m to the south and Church of St Edmund, Hauxton approximately 950m south west. Grade II* Listed Church of All Saints and Rectory Farm House in Little Shelford and Little Shelford Manor, lie approximately 450-600m to the south. There are various Grade II Listed buildings within the Great and Little Shelford and Hauxton Conservation Areas. The promoter's conceptual development framework includes a substantial area of Green Belt and parkland in the southern part of the site. With careful design it should be possible to mitigate any impact on the wider historic environment.
- Great and Little Shelford Conservation Areas lie approximately 150-200m to the south. Hauxton Conservation Area lies approximately 530m to the south west. The promoter's Archaeological Desktop Assessment indicates that there are ten sites and find-spots inside the site including a large part of SAM 58. A further 37 locations are recorded in the 500m Study Area including SAMs 57 and 73, as well as crop marks and a possible Saxon cemetery.
- **Employment Land:** Development would significantly enhance employment opportunities. The promoter proposes a 85,000 sqm Science Park.
 - **Transport:** The site scores well against the sustainable transport score for South Cambridgeshire, which measures access to and quality of public transport and cycling.

99. Appendix 10 of the Addendum Report from page 253 shows how the Council has addressed representations from the site promoter regarding the proforma assessment of this site. No changes to the proforma assessment scores were found to be justified.
100. The overall conclusion of the SA assessment in regard to the sustainability of different development locations are summarised in paragraph 5.4.3 as follows:

"The assessment concludes that the most sustainable level of the development sequence is within Cambridge. Development will have many sustainability benefits including protecting the distinctive setting of Cambridge through safeguarding the Green Belt and the associated biodiversity of the Green Belt".
"With regard to the edge of Cambridge, the assessment has confirmed that there are sustainability benefits to development on the edge of Cambridge. With regard

to transport, development on the edge of Cambridge remains the best performing option with regard to modal share and performs positively due to short distances to the city, low public transport journey times, and in many cases proximity to high frequency public transport. However, the modal share results hide the fact that these locations are in already congested areas of the city where there is little scope to create more capacity for more cars, forcing new trips to be undertaken by active modes. The Local Plans CSRM report shows that different development options do not result in radically different levels of traffic growth, travel times or delay. Whilst there are variations, these are in the context of very high overall traffic growth where significant amounts of development are already committed. Viability evidence has confirmed that sites on the edge of Cambridge do offer higher sales values than options further from the city meaning facilities and infrastructure are more viable. This offers benefits in terms of potential to secure higher funding through Community Infrastructure Levy (CIL) / Section 106.

Cambridge is proposing to secure a higher rate of CIL than South Cambridgeshire, and this higher rate has the potential to be applied to edge of Cambridge sites. However, the Cambridge Inner Green Belt Boundary Study (2015) has concluded that it is unlikely that any development within identified sectors (apart from a few small exceptions) could be accommodated without substantial harm to the Green Belt purposes. Therefore, the conclusions remain that, notwithstanding some of the positive sustainability effects that development on the edge of Cambridge demonstrates, it would not be possible to deliver significant additional development here without significant detriment to the specific purposes of the Cambridge Green Belt”.

101. The paragraph also looks at new settlements and village sites.
102. At paragraph 9.4 the report sets out the reason for selection of the preferred strategy to the location of development set out in the Local Plans as follows:

“The Councils acknowledge the advantages of edge of Cambridge sites in terms of accessibility to jobs and services in the urban area. The Councils have also taken account of the constraint imposed by the purposes of the Cambridge Green Belt and the level of harm that large developments within the currently designated Green Belt would have. However, this factor itself has been balanced against the need to promote sustainable patterns of development and the consequences of channelling development to locations outside the Green Belt. Consideration of sustainability must take account of the full range of economic, social and environmental issues. NPPF paragraph 152 requires Local Planning Authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

In the context of all evidence now available, the Councils have considered the merits of edge of Cambridge sites and the locational advantages they offer, against the significant harm that would be caused by substantial development on

the edge of Cambridge to the purposes of the Cambridge Green Belt. Additional new settlements offer sufficient benefits in terms of critical mass, services and facilities and opportunities to deliver high quality transport improvements. The Councils consider that the need for jobs and homes could in principle provide a justification for review of the green belt boundary. However whether in fact such a release is appropriate involves balancing other consideration including impact of release on the purpose of the Cambridge green belt, the accessibility advantages of locating development on the edge of the urban area and reasonable alternatives. The result of this balancing exercise has led the Councils to conclude that only small scale green belt released at locations where harm to the purposes of the green belt designation would be appropriate".

Cambridge and South Cambridgeshire Development Strategy Update⁶²

103. This document describes the key evidence documents related to the alternative development strategies, and provides a summary of key issues in relation to each stage of the development sequence. It summarises the role of sustainability appraisal in the plan making process, and key findings in relation to the development sequence.
104. Drawing on the evidence base, it then considers in Section 3 the consequences and issues related to the strategic choices available to the Council, including the consideration of sustainable patterns of development (as required by NPPF paragraphs 84 and 85) in the context of an area with a tightly drawn Green Belt around the historic city of Cambridge. It identifies the reasons for the preferred approach of the Councils in the submitted plans and having considered the issue afresh, taking account of the additional work undertaken. It concludes that the Councils have carried out or commissioned new studies to review the evidence on objectively assessed housing needs, Green Belt, transport, infrastructure and viability to ensure that the decision on the preferred strategy is based on a full understanding of the implications of the different strategy options. An addendum to the Sustainability Appraisal has also been carried out to ensure that the sustainability issues of the options available to the Councils are understood, in particular of land on the edge of Cambridge and at new settlements.
105. The Councils have been clear that they recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation, although it makes clear that major new development on the edge of Cambridge on congested radial routes have their own transport issues and are not necessarily cheap to deliver⁶³. The independent Green Belt evidence supports the findings of the Councils' own evidence that the release of land on the edge of Cambridge can be expected to compromise substantially the purposes of the Cambridge Green Belt, with two exceptions. One to reduce the size of an allocation in the submitted South Cambridgeshire Local Plan and one to allocate a new employment allocation as an extension to the Cambridge Biomedical Campus.

⁶² Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060)

⁶³ See for example paragraph 22 of the Councils Matter 7 Transport statement

106. The evidence also looks at the potential to deliver sustainable new settlements, as an alternative to sites on the edge of Cambridge. It concludes that they can provide viable and deliverable developments, that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, that will attract significant levels of patronage and also provide wider benefits to existing communities. The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.
107. Having weighed all those factors, the Councils maintain their view that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period. The strategy will provide a range of deliverable sites for the plan period and beyond, and the Councils consider that sustainability will be secured.

Assessment and Conclusion

108. It is not necessary to allocate this site to make the plan sound. It has been demonstrated through the plan making process that there are better alternatives available to meet development needs.
109. The SHLAA (including the combined Green Belt Site and Sustainability Appraisal Assessment Proforma) and SA provide a robust assessment of the site and comparison with alternatives subject to the considerations set out in this statement.
110. A number of criticisms of the November 2015 Inner Green Belt Boundary study were made by the promoter of this site in response to the proposed Modifications consultation (Reps 65430, and 65431). Whilst methodological concerns were primarily addressed at the PM2 Green Belt Review Methodology hearing in June 2016 a number of closely related site specific concerns were also made to the effect that the assessment of sector 8 in the study is not appropriate.
111. Paragraph 4.4 of appendix 2 of the Planning Report appended to representation 65431 contrasts the finding of LDA Design's 2002 Study that there was potential to develop parts of 'the areas east and south of Trumpington' with the finding of the 2015 Study that there is no such potential. The reference to areas east and south of Trumpington in LDA Design's 2002 Study is to the area shown as 11 on drawing 1641LP/10 in that Study, which is now being built out as the Clay Farm development. There was no suggestion in the 2002 Study that further areas east and south of Trumpington could be developed. Paragraph 4.6 of the report notes that LDA Design's 2002 Study describes Cambridge South as Connective townscape/landscape whereas the 2015 Study identifies the northern part of sector 8 as Supportive. The explanation for this change is given at criterion 8 of the assessment of sector 8 on page 117 of the LDA Design 2015 Study⁶⁴.

⁶⁴ RD/MC/020

112. Sector 8 is assessed in section 6.11 of the LDA Design Study, with the assessment of criteria provided in the table at paragraph 6.11.2. The following comments respond to the points at 3.16 of the Planning Report.
- Criterion 1 – the ongoing developments at Trumpington Meadows, Clay Farm and Glebe farm are generally perceived as forming part of Cambridge rather than Trumpington. The urban gateway referred to in the quoted Reference 2 is the gateway to Distinctive Cambridge rather than Cambridge as a whole. The LDA Design Study is correct to state that further development would increase the impression of the city sprawling outwards.
 - Criterion 2 – the specification for the LDA Design Study expressly excluded the assessment of Green Belt in the context of NPPF para 85 and how Green Belt is addressed in the SA/SEA process in response to NPPF para 84.
 - Criterion 8 – explanation as to the reasons that Glebe Farm is considered Supportive is provided at criterion 8 of the assessment of sector 8 on page 117 of the LDA Design Study. However, the presence of Supportive landscape is not automatically used to preclude development.
 - Criterion 10 – there is no statement within the LDA Design Study that the urban gateway formed by the Glebe Farm development is only a gateway to Trumpington rather than to Cambridge.
 - Criterion 12 – any development within sub area 8.1 will reduce the physical separation between Cambridge and Great Shelford, regardless of whether it has been designed to retain some level of separation.
 - Criterion 13 – these comments fail to recognise the difference between criteria 12 and 13. Criterion 12 relates to separation, whereas criterion 13 relates to the character and setting of the village. There is no contradiction in the LDA Design Study indicating that the sector is important in the separation between Great Shelford and Cambridge, but plays a more limited role in the setting of the village given the physical separation between the edge of the sector and the edge of the village.
 - Criterion 15 – as stated in the assessment of criterion 15, openness is a distinctive feature of sub area 8.1. The lack of a strong landscape structure within the sub area at present indicates that it is currently lacking a defensible boundary.
113. Development of the site would have a significant negative impact on Green Belt purposes and on landscape and townscape. Any form of development within sub area 8.1 would reduce the distinctive separation between the edge of the city and the M11 and would affect the well designed and distinctive gateway to the city that is being created at Glebe Farm / Trumpington Meadows⁶⁵. It would also significantly encroach on the separation between Cambridge and the necklace villages of Great Shelford, Hauxton and Little Shelford. No Green Belt release should be considered favourably in sub area 8.1.
114. The promoter's transport appraisal⁶⁶ which was included in the submitted representations for this site proposes a series of road widening and junction improvements, an entry off the M11 roundabout, as well as a through route between Addenbrooke's Road and Cambridge Road. The promoters indicate this could take

⁶⁵ RD/MC/030 Sector 8 from page 115

⁶⁶ Representation 59556 Planning Report Cambridge South Part 2

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traffic pressure off existing junctions. However, the County Council advised that it does not consider the M11 roundabout proposal a suitable option⁶⁷. The County Council has also advised that currently they would not envisage such a link providing a strategic through route for general traffic, and would anticipate it to be designed to discourage these movements.

115. The SA site appraisal⁶⁸ indicates that significant congestion already occurs in this quadrant of Cambridge which is likely to be exacerbated by the full build out of the planned and approved southern fringe residential and CBC developments. These developments have already been through their TA process to consider their impacts. As such, while significant infrastructure has already been introduced in this quadrant (AAR, M11 junction improvement works, CGB, CGB cycle track), any TA will need to carefully examine and clearly demonstrate how the site can be delivered without having unacceptable severe impact on the surrounding transport networks. Cycling and pedestrian improvements are also proposed, to link with the existing network in the southern part of Cambridge. However, the Council consider that the M11, A1309 and the Addenbrooke's link road combine to provide significant severance for walking and cycling trips to off-site destinations, including the public transport and employment nodes at Trumpington Park and Ride and Addenbrooke's. These provide a significant barrier to making this site attractive in terms of sustainable transport.
116. The Objector's proposal includes a significant employment development. The Council has responded to issues regarding employment development needs, and specifically on the edge of Cambridge in response to other Hearing Matters⁶⁹. Given the comparable levels of need and supply, there are no exceptional circumstances to make further allocations on the edge of Cambridge beyond those identified⁷⁰.
117. The locational advantages of large scale development on the edge of Cambridge are not considered to outweigh its negative impact on the purposes of the Cambridge Green Belt taking account of reasonable alternatives for both housing and economic development.
118. The site is not required to meet objectively assessed need (for homes and economic development⁷¹) in the plan period. The site does not need to be allocated to make the plan sound.

⁶⁷ Cambridge and South Cambridgeshire Local Plans Sustainability Appraisal Addendum Report (Revised) (March 2016) (RD/MC/021), Site CCSC1004, page 264

⁶⁸ Sustainability Appraisal Addendum Report (RD/MC/021). Annex 1 Part 2 Site CCSC1004 on pages 252-265 (Access is addressed on page 263)

⁶⁹ Matter 4, Matter SC7, Matter CC4

⁷⁰ South Cambridgeshire Matter SC7 Statement paragraph 14.

⁷¹ See in particular the Council matter statement for Matter SC7 pages 2-6 (SC7A.1.i)

Matter M11.3 North of Barton Road and Grange Farm, West Cambridge

M11.3i

Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?

- North of Barton Road**

North Barton Road Land Owners Group represented by Carter Jonas

Cambridge Reps:

27506 (Strategic Objectives)
66191 (Proposed Modification PM/SC/2/G)

South Cambridgeshire Reps:

59582 (Policy S/4 Green Belt)
59608 (Paragraph 3.3)

- Grange Farm**

St John's College represented by Savills

Cambridge Reps:

27966 (Policy 26 Site Development Opportunities)
66019 (Proposed Modification PM/CC/2/E)

Summary of promoters' proposal

119. The North of Barton Road site is proposed to be developed as a sustainable urban extension to Cambridge for 1,450 homes, a primary school and local centre with shops and services, open spaces and sports, structural planning, sustainable drainage features, with vehicular access from Barton Road with a possible link into the Grange Farm site, and a number of cycle links including to Grange Road towards the city centre. The Grange Farm site is proposed for 400-500 homes including provision for open space and sports, structural planting, and a small retail unit. Access to be from Clerk Maxwell Road to the north.
120. The omission sites are shown on the map in Appendix 2.
121. The sites were submitted to the Councils in response to their 'call for sites' when preparing their respective Strategic Housing Land Availability Assessments (SHLAA).

Issues and Options consultations 2012

122. The Councils' separate consultations both asked if any of ten broad locations around the edge of Cambridge had potential to be released from the Green Belt to provide

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new housing to meet housing needs⁷². Land north of Barton Road including Grange Farm being within broad location 1.

123. In summary the Issues and Options consultations resulted in the following representations⁷³ (including ones to land south of Barton Road).

City: Support: 4, Object: 91

SCDC: Support: 5, Object: 53, Comment: 6

ARGUMENTS IN SUPPORT:

- The release of sensitive Green Belt land around Cambridge is not unprecedented e.g. North West Cambridge;
- Suitable site for residential development with employment, shops, schools, services and open space provision (including a wildlife reserve and country park);
- Could help meet development needs of Cambridge area including for affordable housing, such need has been exacerbated by the lack of development at Cambridge East;
- Close to West Cambridge, housing development here would complement its employment floorspace;
- The location would encourage sustainable modes of transport;
- Low density, well landscaped, sensitive and high quality development acceptable.

OBJECTIONS:

- No exceptional case exists to justify more Green Belt development;
- Substantial Green Belt release has only recently been sanctioned so further release should not be contemplated. There should be a settling in period of at least 10 years to allow for the impact of current developments on the edge of Cambridge to be assessed;
- No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages);
- The land is in a highly sensitive area of the Green Belt, which is important to the setting of the city and adjacent conservation area and forms an important approach to the city. Forms a vital part of the Quarter to Six Quadrant (QTSQ);
- Forms part of the wider setting of the historic core of Cambridge and the large number of highly graded listed buildings within the core;
- The site contains the remnants of the West Field and almost certainly contains archaeological remains dating at least as far back as the Roman occupation. New development would detract from the historic character of Cambridge;
- Would destroy the last remaining vista of the historic core and the last remaining stretch of road into Cambridge not subject to urban sprawl;
- The area is important for wildlife, including threatened species;

⁷² Issues and Options Reports for both Local Plans June/July 2012 (SCDC RD/LP/030 page 43, CCC RD/LP/240 page 59)

⁷³ RD/Sub/SC/060 Draft Final Sustainability Assessment (March 2014) Annex B, Site Assessments for edge of Cambridge sites - Broad location 1 from page B2035 and RD/Sub/C/080 Cambridge City Council Statement of Consultation and Audit Trails, from page 777. Summary of Issues and Options 2012 comments on broad locations in the Green Belt.

- The area should not be designated for housing but for playing fields and recreation;
- Harmful to Green Belt purpose of protecting the character and setting of a historic city,
- development in Green Belt villages would be less harmful;
- Part of setting for Grantchester Meadows and Coton Country Park;
- Loss of a green lung for Cambridge which is easy to access on foot;
- Loss of recreation facilities contrary to NPPF;
- Would bring development closer to necklace villages;
- Inadequate road infrastructure and capacity,
- Barton Road already heavily congested;
- Development would make it harder to commute into Cambridge by car along Barton Road;
- Would bring more traffic through Grantchester;
- Impact on local services and facilities;
- Land close to Bin Brook is subject to flooding and development could increase flood risk downstream;
- Noise and air quality concerns close to M11;
- Inadequate water supply to support development;
- Site rejected in the past and nothing has changed to reduce the importance of the area;
- Inadequate local infrastructure including schools.

COMMENTS:

- The QTSQ should be preserved & enhanced;
- A limited area may be possible to develop if well landscaped..

Councils' Joint Issues & Options 2: Part 1 consultation 2013

124. A technical assessment of a range of sites was undertaken having regard to the comments submitted in response to the Issues & Options consultations in summer 2012 on the ten broad locations in the Green Belt on the edge of Cambridge. The sites assessed were those submitted to the Councils' as part of the 'call for sites' when preparing their respective SHLAAs and any land identified through the new Green Belt review as fulfilling Green Belt purposes to a lesser degree.
125. The omission site was considered through the joint combined Green Belt Site and Sustainability Appraisal Assessment Proforma⁷⁴ (as sites CCC921, CC916, CC926, CC927 and SC232 and SC299. These sites were identified taking account of developer proposals following the SHLAA 'call for sites', as well as additional potential options. Where falling across district boundaries the sites were broken up into separate land parcels. A joint site testing proforma was developed for the purpose of testing edge of Cambridge sites. The criteria in the proforma took into account the social, environmental and economic sustainability themes and objectives identified in the SA scoping reports of both Councils, as well as deliverability and developability of sites. It included a two stage assessment, where sites failing the first stage where

⁷⁴ Issues and Options 2 Part 1 Joint Consultation on Development Strategy & Site Options on the edge of Cambridge January 2013, Technical Background Document Part 1 (RD/LP/170 from pages 102, 123, 136, 149, 166, and 182 maps included)

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rejected from further consideration as potential allocations (although the remainder of the assessment was completed for each site).

126. The main planning constraints and adverse impacts identified were:

CC921 Land north of Barton Road	<ul style="list-style-type: none"> • Significant impact on Green Belt purposes. • No access unless developed in conjunction with SC232 or CC916. • Site is further than 800m from a health centre/GP and its size would mean it is less likely to be able to provide for new health facilities on site. • It is not accessible to high quality public transport. • Air quality worsening as a result of size of development
CC 927 Land north of Barton Road (2)	<ul style="list-style-type: none"> • Adverse impact on Green Belt purposes. • Inadequate vehicular site access unless developed with adjoining sites. • Site is not near to local facilities such as district / local centre, GP surgery and primary school, and due to its size it is less likely to be able to provide for new facilities. • it is not accessible to high quality public transport
CC916 Grange Farm	<ul style="list-style-type: none"> • Very significant impact on Green Belt purposes. • Site is further than 800m from a health centre/GP and its size would mean it is less likely to be able to provide for new health facilities on site. • The western part of the site suffers from poor air quality and noise due to the proximity of the M11. • Air quality worsening as a result of size of development
CC926 Part of the Grange Farm site	<ul style="list-style-type: none"> • Adverse impact on Green Belt purposes. • Inadequate vehicular site access unless developed with site CC927 or with allocated site 7.09 which is in the same ownership. • Site is not near to local facilities such as district / local centre, GP surgery and primary school, and due to its size it is less likely to be able to provide for new facilities. • It is not accessible to high quality public transport. • Development would result in the loss of a playing field, which could potentially be protected under Cambridge Local Plan Policy 4/2. This open space would have to be satisfactorily replaced elsewhere
SC 232 Land north and south of Barton Road	<ul style="list-style-type: none"> • Very significant impact on Green Belt purposes. • Part of land north of Barton Road falls within Flood Zone 3 (high risk). • The site does not have access to high quality public transport. • The western part of the site suffers from poor air quality and noise due to the proximity of the M11. • Further than 800m to access health facilities though the size of the site would merit new provision within the development.
SC 299 Land north of Barton Road	<ul style="list-style-type: none"> • Significant impact on Green Belt purposes. • Large areas of the site north of Barton Road within Flood Zone 3 (high risk). • The site does not have access to high quality public transport. • The western part of the site suffers from poor air quality and noise due to the proximity of the M11. • Further than 800m to access health facilities though the size of the site would merit new provision within the development

127. The Green Belt appraisals in the assessment proformas were informed by two studies, the Cambridge Inner Green Belt Boundary Study 2012⁷⁵ and the Cambridge Green Belt Study 2002⁷⁶.
128. The sites were assessed as having no significant development potential (significant constraints and adverse impacts - scored Red).
129. Objections were received from the site promoters to the Issues & Options 2: Part 1 consultation which are summarised in the South Cambridgeshire Draft Final Sustainability Appraisal Report⁷⁷ and Cambridge Statement of Consultation⁷⁸ as follows:

"Barton Road Land Owners Group - believe land north and south of Barton Rd should be released for development in accordance with principles in the concept Master Plan. A strategy of dispersal is unsustainable. The scale of affordable housing need and the need to support the economy justify releasing more land on the edge of Cambridge to support the University and Colleges and research institutions in a sustainable location. Evidence to reject the sites was not robust. A number of supporting technical documents supported reps at Issues and Options Stage which have informed the production of a concept Master Plan to provide 1500 dwellings a small science park, local centre, a school, relocated sports pitches for colleges, green infrastructure and access roads. There are process issues in the timing of decisions to reject sites while the quantum of development has not been finalised which is procedurally unsound. GL Hearn's Housing Requirements Study for BRLOG concludes an objectively assessed housing requirement would require 43,800-46,000 homes 2011-2031. 19,000 in Cambridge and 25,300 in SCDC. Experience with Rushcliffe Core Strategy and elsewhere highlights importance of an up to date SHMA in identifying housing need. The need for a long term supply of land was highlighted in examination of Dacorum's Core Strategy. The Structure Plan Green Belt releases were only meant to provide land to 2016. Sites shouldn't have been assessed before the quantum of land needed is identified. If Cambridge East does not come forward in the plan period alternative locations should be considered. The Green Belt is tightly drawn and doesn't allow for any safeguarded land to meet longer term needs. The approach taken is not justified in line with PAS guidance.in relation to a credible evidence base, consideration of reasonable alternatives, and how they perform. The evidence used to reject the site is not robust, and the proposed strategy is not justified and is likely to be found unsound unless early and material changes are made. The decision to reject the site also not legally compliant on basis that reps made to Issues and Options One have been ignored (Regulation 18(3) of 2012 Regs) given they promoted a reasonable alternative.

⁷⁵ RD/Strat/210 Sector 3

⁷⁶ RD/Strat/180

⁷⁷ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 4, pages A1313-A1314

⁷⁸ Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080), pages 792-793

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St John's College - rejects the Council's assessment of Grange Farm site in the light of the need to address objectively assessed needs, the scale and character of the site having regard to its sustainable location on the edge of Cambridge. The College's vision is to develop the eastern part of the site and provide significant open space to the west. They therefore do not accept there would be any impact on coalescence. Dominant features in this area include the West Cambridge Site, which has changed the character of the area and forms an abrupt edge. There are two green corridors into west Cambridge but this northern one is bounded by modern development on the West Cambridge site. Vehicular access could be gained from Clerk Maxwell Road. Council is pre-empting the results of technical studies of air quality near the M11."

130. The Councils' response to representations on rejected sites in broad location 7 (land between Babraham Road and Fulbourn Road) is outlined in the South Cambridgeshire Draft Final Sustainability Appraisal Report⁷⁹ and Cambridge Development Plan Scrutiny Sub-Committee Report 29 May 2013⁸⁰.

Proposed Submission Local Plans 2013

131. The sites were not included in either the Cambridge or South Cambridgeshire Proposed Submission Local Plans.

Representations Received on Proposed Submission Local Plans

132. The site promoters objected to the rejection of these site (including reps CCC 27506, 66191 / SCDC 59582, 59608 (North of Barton Road), and CCC 27966, 66091 (Grange Farm)).
133. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 59582 to policy GB/4). Key reasons for objection were:
 - The Green Belt boundary that results from the development strategy proposed in Draft SCLP has no degree of permanence to it and would not endure beyond the plan period. There will be other development needs beyond 2031, and those needs must be acknowledged when defining the Green Belt boundary in Draft SCLP. A proper assessment of safeguarded land has not been undertaken for Draft SCLP, and none of the Green Belt studies have considered this matter.
134. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 59608 to para 3.3). Key reasons for objection were:

⁷⁹ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 4, page A1318-A1320

⁸⁰ Development Plan Scrutiny Sub Committee Report 29 May 2013 - Cambridge Local Plan– Draft Local Plan Including The Preferred Approach To The Spatial Strategy, Vision And Objectives (RD/CR/380)

- We have requested a comprehensive review of the Green Belt to meet objectively assessed development needs, and to deliver sustainable patterns of development. We are promoting Land to the North of Barton Road as a new strategic site to meet the development needs in a sustainable location on the edge of Cambridge.
135. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 27506 to the Strategic objectives). Key reasons for objection were:
- We conclude that Objectives 8 and 10 would not be delivered because of the development strategy proposed in Draft CLP2014.
136. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 66191 to the Proposed Modifications Consultation 2015). Key reasons for objection were:
- CSa, on behalf of North BRLOG, has undertaken an assessment of the Inner Green Belt Review 2015, and concludes that:
 - It is bias towards 'setting'
 - Exaggerates the 'unspoilt' nature of the views from the west of Cambridge
 - Assumes that development would occur across North of Barton Road
 - The Local Plans CSRM Transport Report supports the merits of development on the edge of Cambridge.
 - The land to the North of Barton Road:
 - Does not require transport measures to generate a high level of trips by walking and cycling.
 - Provides an opportunity to facilitate sections of the radial and orbital routes proposed as City Deal projects.
137. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 27966 to policy 26). Key reasons for objection were:
- This policy is unsound because it does not allocate sufficient sites for housing development for the Plan period.
 - The Grange Farm site in West Cambridge should be allocated for residential development as shown on the attached plan. This would enable housing needs to be met and would not have an adverse effect on the Green Belt.
138. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 66019 to the Proposed Modifications Consultation 2015). Key reasons for objection were:
- Do not consider Green Belt Study methodology is appropriate or correct conclusions drawn.
 - Methodology is not NPPF compliant - Green Belt should not need to be altered beyond end of plan period 2031 - not considered. Too many different criteria used to consider Green Belt qualities - overlap and should not have

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- equal weight. Should have used a scoring system to provide more transparent way of identifying relative importance of different parts of Green Belt.
 - Clients' site is Grange Farm - have submitted Landscape and Visual Assessment. Conclusions from Qualities 1,7 and 16 considered important. Site suitable for release from Green Belt.
139. The Councils considered the representations, but did not consider that the site needed to be included in the Proposed Submission Plans to make the plans sound⁸¹.

Submitted Local Plans 2014

140. The site was not included in the submitted Cambridge or South Cambridgeshire Local Plans

Consideration since the Local Plans were Submitted

Local Plan hearings

141. Matters and issues relevant to Land north of Barton Road and Grange Farm have been considered at previous examination hearings. The Councils have prepared statements in response to all of these Matters and Issues.

Inspector's letter 20 May 2015

142. The Inspectors wrote to the Councils on 20 May 2015⁸² with concerns regarding a number of matters including the overall development strategy, the appraisal of all reasonable alternatives (including sites on the edge of Cambridge), the methodology of the Cambridge Inner Green Belt Boundary Study 2012 and the infrastructure requirements and sustainable transport options for the new settlements. In June 2015⁸³ the Councils wrote to the Inspectors setting out a programme of work to address these concerns including preparation of a Green Belt review, preparation of a Transport report, and preparation of an addendum to the SA, informing a review of the development strategy. In July 2015⁸⁴ the Inspector's formally suspended the examinations until March 2016.

Cambridge Inner Green Belt Boundary Study (November 2015)⁸⁵

143. The Inspectors' letter raised questions about the methodology of the Cambridge Inner Green Belt Boundary Study 2012. In response the Councils commissioned a new

⁸¹ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 8 Responding to Proposed Submission Representations on Sites not Included in the Plan, pages A1608-A1609 AND Cambridge Full Council Committee Report 13 February 2014 (RD/CR/450)

⁸² RD/Gen/170

⁸³ RD/Gen/180

⁸⁴ RD/Gen/200

⁸⁵ Cambridge Inner Green Belt Boundary Study (RD/MC/030)

assessment of the Inner Green Belt Boundary by LDA Design⁸⁶. The methodology of the study was examined at the Matter PM2 hearings in June 2016.

144. The study's conclusions regarding the North of Barton Road and Grange Farm sites are set out in regard to Sector 3 from page 87, with minor amendments to one paragraph on page 1 of the supplement to the study⁸⁷. The study notes that this sector (Sector 3) plays a key role in the setting of the west of Cambridge, ensuring that the city remains compact and that the historic core remains large in comparison to the size of the city as a whole. It retains open countryside close to the centre of the city and prevents the sprawl of built development as far as the M11, retaining the distinctive separation between the edge of the city and the M11. This is in sharp contrast to the relationship of the city edge with the A14 to the north of Cambridge. Views towards Cambridge from the west are some of the most distinctive and characteristic available, with the rural landscape of the sector forming the foreground in those views. Sub area 3.2 exhibits less of these features due to its higher degree of visual screening. However, it remains important to the character of the approach to Cambridge along Barton Road.
145. The study concludes that it is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes. Development within sub areas 3.1 or 3.2 would substantially harm or, depending on its extent⁸⁸ remove the characteristic setting to the city, diminish both in reality and in perception, the presence of countryside close to the distinctive core of Cambridge and obstruct key views. Within sub area 3.2, development would also alter the characteristic approach into Cambridge along Barton Road. Within sub area 3.3, development would impact on the relationship with the distinctive townscape within the West Cambridge Conservation Area and would remove all or part of¹¹ the closest area of countryside to the historic core. No Green Belt release should be contemplated in this sector.

Cambridge and South Cambridgeshire Local Plans Transport Report⁸⁹

146. The Local Plan Examination Inspectors' Preliminary Conclusions (20 May 2015) sought to ensure that the sustainability implications of different development strategy options had been fully considered, including comparisons of strategy options which include development on the edge of Cambridge. It also stated that if development is to be directed to new settlements rather than the edge of the urban area, that the challenges of making such development as sustainable as possible have been addressed, in particular infrastructure requirements and sustainable transport options.
147. In response to the Inspector's letter, the Council prepared a suite of new evidence, including a new consolidated Modelling Report / Local Plan Transport Assessment.

⁸⁶ Cambridge Inner Green Belt Study 2015 (RD/MC/030) pages 110-114

⁸⁷ RD/MC/031 Cambridge Inner Green Belt Study Supplement (March 2016, page 1

⁸⁸ RD/MC/031 Cambridge Inner Green Belt Study (November 2015) Supplement. Amended text regarding Sector 3

⁸⁹ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060)

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This included modelling to compare different strategy options, including significant edge of Cambridge focused options with new settlement or village focused strategies.

148. The Phase 2 2015 model runs included a west radial focus (option 4)⁹⁰ incorporating the representor's proposal. In order to consider the transport impact of development strategy Option 4, this resulted in a package of mitigation measures being identified⁹¹. For the Barton Road proposals, this included access measures onto Barton Road and Grantchester Road in the do minimum option, and highway measures, public transport, walking and cycling improvements in the do-something.
149. The edge of Cambridge major development areas tested in the options, including option 4, showed higher mode shares for active travel modes than new settlements or villages to Cambridge⁹². However, the overall difference in the number of vehicle trips generated by the different strategy options tested was less marked, with a broad level of consistency in level of forecast traffic growth in each of the phase 2 development scenarios⁹³.

Sustainability Appraisal Addendum Report and Supplement (Addendum November 2015 / Supplement March 2016)⁹⁴

150. The Councils prepared an SA Addendum Report that takes account of the additional evidence that has been undertaken in response to the Inspectors' concerns. All sites throughout the development sequence are assessed in a consistent way.
151. The Cambridge and South Cambridgeshire Local Plans SA Addendum Report November 2015 includes updated site assessment proformas for a number of areas North of Barton Road:
 - CCSC1001 Land North of Barton Road (Developer Proposal)
 - CC916 Grange Farm
152. New site assessments were undertaken and included in the March 2016 update responding to representations⁹⁵:
 - CCSC1001a combined site assessment site Land North of Barton Road and Grange Farm (New or amended site March 2016)

⁹⁰ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) table 5-1 Page 44, and figure 5-4 page 46

⁹¹ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) table B.3 Page 87

⁹² Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) figure 5-11 Page 54

⁹³ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) para 5.68 page 56

⁹⁴ Cambridge and South Cambridgeshire Local Plans SA Addendum Report RD/MC/020 (November 2015), and its supplement from November 2016 RD/MC/021 Annex 1 part 3 page 515 (combined site assessment site reference CCSC1001a)

⁹⁵ Sustainability Appraisal Addendum Report March 2016 Main Report (RD/MC/021) Appendix 10

- CC916a Grange Farm (New or amended site March 2016)
153. The SA addendum Report combined site assessment site reference CCSC1001a assessed the potential of this site to accommodate approximately 2,000 dwellings, supported by a Local Centre, school, open space (including relocated sports pitches for colleges), green infrastructure, cycle and footpath links to surrounding area; and access roads. Some of the key issues identified in the SA Addendum Report for this site are set out below:
- **Air Quality:** Less than 1,000m from the M11. There is a potential for significant increases in traffic emissions and static emissions that could affect local air quality.
 - **Noise:** The site lies close to the M11 and while residential development could be acceptable, a high level of transport noise mitigation would be required: combination of appropriate distance separation, careful orientation / positioning / design / internal layout of buildings, noise insulation scheme and extensive noise attenuation measures to mitigate traffic noise (single aspect, limited height, sealed non-openable windows on façade facing M11 / , acoustically treated alternative ventilation, no open amenity spaces such as balconies / gardens).
 - **Green Belt:** Very high and high impacts on Greenbelt purposes (very significant negative impact)
 - **Heritage:** The eastern end of Barton Road, lies within the West Cambridge Conservation area. The site is located on the route of a Roman road running south west from Cambridge.
Previous fieldwork in the area has confirmed the survival of significant remains of late prehistoric date.
 - **Transport:** The site scores well against the sustainable transport score for South Cambridgeshire, which measures access to and quality of public transport and cycling.
154. Appendix 10 of the Addendum Report from page 253 shows how the Council has addressed representations from the site promoter regarding the proforma assessment of this site. A number of changes to the proforma assessment scores were found to be justified⁹⁶.
155. The overall conclusion of the SA assessment in regard to the sustainability of different development locations are summarised in paragraph 5.4.3 as follows:

“The assessment concludes that the most sustainable level of the development sequence is within Cambridge. Development will have many sustainability benefits including protecting the distinctive setting of Cambridge through safeguarding the Green Belt and the associated biodiversity of the Green Belt”. “With regard to the edge of Cambridge, the assessment has confirmed that there are sustainability benefits to development on the edge of Cambridge. With regard to transport, development on the edge of Cambridge remains the best performing option with regard to modal share and performs positively due to short distances to the city, low public transport journey times, and in many cases proximity to

⁹⁶ RD/MC/021 Appendix 10

high frequency public transport. However, the modal share results hide the fact that these locations are in already congested areas of the city where there is little scope to create more capacity for more cars, forcing new trips to be undertaken by active modes. The Local Plans CSRM report shows that different development options do not result in radically different levels of traffic growth, travel times or delay. Whilst there are variations, these are in the context of very high overall traffic growth where significant amounts of development are already committed. Viability evidence has confirmed that sites on the edge of Cambridge do offer higher sales values than options further from the city meaning facilities and infrastructure are more viable. This offers benefits in terms of potential to secure higher funding through Community Infrastructure Levy (CIL) / Section 106. Cambridge is proposing to secure a higher rate of CIL than South Cambridgeshire, and this higher rate has the potential to be applied to edge of Cambridge sites. However, the Cambridge Inner Green Belt Boundary Study (2015) has concluded that it is unlikely that any development within identified sectors (apart from a few small exceptions) could be accommodated without substantial harm to the Green Belt purposes. Therefore, the conclusions remain that, notwithstanding some of the positive sustainability effects that development on the edge of Cambridge demonstrates, it would not be possible to deliver significant additional development here without significant detriment to the specific purposes of the Cambridge Green Belt”.

156. The paragraph also looks at new settlements and village sites.
157. At paragraph 9.4 the report sets out the reason for selection of the preferred strategy to the location of development set out in the Local Plans as follows:

“The Councils acknowledge the advantages of edge of Cambridge sites in terms of accessibility to jobs and services in the urban area. The Councils have also taken account of the constraint imposed by the purposes of the Cambridge Green Belt and the level of harm that large developments within the currently designated Green Belt would have. However, this factor itself has been balanced against the need to promote sustainable patterns of development and the consequences of channelling development to locations outside the Green Belt. Consideration of sustainability must take account of the full range of economic, social and environmental issues. NPPF paragraph 152 requires Local Planning Authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

In the context of all evidence now available, the Councils have considered the merits of edge of Cambridge sites and the locational advantages they offer, against the significant harm that would be caused by substantial development on the edge of Cambridge to the purposes of the Cambridge Green Belt. Additional new settlements offer sufficient benefits in terms of critical mass, services and facilities and opportunities to deliver high quality transport improvements. The

Councils consider that the need for jobs and homes could in principle provide a justification for review of the green belt boundary. However whether in fact such a release is appropriate involves balancing other consideration including impact of release on the purpose of the Cambridge green belt, the accessibility advantages of locating development on the edge of the urban area and reasonable alternatives. The result of this balancing exercise has led the Councils to conclude that only small scale green belt released at locations where harm to the purposes of the green belt designation would be appropriate".

Cambridge and South Cambridgeshire Development Strategy Update⁹⁷

158. This document describes the key evidence documents related to the alternative development strategies, and provides a summary of key issues in relation to each stage of the development sequence. It summarises the role of sustainability appraisal in the plan making process, and key findings in relation to the development sequence.
159. Drawing on the evidence base, it then considers in Section 3 the consequences and issues related to the strategic choices available to the Council, including the consideration of sustainable patterns of development (as required by NPPF paragraphs 84 and 85) in the context of an area with a tightly drawn Green Belt around the historic city of Cambridge. It identifies the reasons for the preferred approach of the Councils in the submitted plans and having considered the issue afresh, taking account of the additional work undertaken. It concludes that the Councils have carried out or commissioned new studies to review the evidence on objectively assessed housing needs, Green Belt, transport, infrastructure and viability to ensure that the decision on the preferred strategy is based on a full understanding of the implications of the different strategy options. An addendum to the Sustainability Appraisal has also been carried out to ensure that the sustainability issues of the options available to the Councils are understood, in particular of land on the edge of Cambridge and at new settlements.
160. The Councils have been clear that they recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation, although it makes clear that major new development on the edge of Cambridge on congested radial routes have their own transport issues and are not necessarily cheap to deliver⁹⁸. The independent Green Belt evidence supports the findings of the Councils' own evidence that the release of land on the edge of Cambridge can be expected to compromise substantially the purposes of the Cambridge Green Belt, with two exceptions. One to reduce the size of an allocation in the submitted South Cambridgeshire Local Plan and one to allocate a new employment allocation as an extension to the Cambridge Biomedical Campus.
161. The evidence also looks at the potential to deliver sustainable new settlements, as an alternative to sites on the edge of Cambridge. It concludes that they can provide viable and deliverable developments, that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, that will

⁹⁷ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060)

⁹⁸ See for example paragraph 22 of the Councils Matter 7 Transport statement

attract significant levels of patronage and also provide wider benefits to existing communities. The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.

162. Having weighed all those factors, the Councils maintain their view that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period. The strategy will provide a range of deliverable sites for the plan period and beyond, and the Councils consider that sustainability will be secured.

Assessment and Conclusion

163. It is not necessary to allocate this site to make the plan sound. It has been demonstrated through the plan making process that there are better alternatives available to meet development needs.
164. The SHLAA (including the combined Green Belt Site and Sustainability Appraisal Assessment Proforma and SA provide a robust assessment of the site and comparison with alternatives subject to the considerations set out in this statement.
165. A number of criticisms of the November 2015 Inner Green Belt Boundary study were made by the promoter of this site in response to the proposed Modifications consultation (Reps 66019, 66139, 66190, and 66191). Whilst methodological concerns were primarily addressed at the PM2 Green Belt Review Methodology hearing in June 2016 a number of closely related site specific concerns were also made to the effect that the assessment of sector 3 in the study is not appropriate.
166. The Grange Farm site is located across parts of sub areas 3.1 and 3.3 of sector 3, as identified in the LDA Study⁹⁹. Sector 3 is considered in detail in section 6.6 of the LDA Study, which confirms that the whole of sector 3 is important to Green Belt purposes. If land within the eastern parts of these sub areas were to be released for development, it would damage the characteristic setting of the city, diminish (both in reality and in perception) the presence of countryside close to the distinctive core of Cambridge and obstruct key views.
167. There has been an acceptance in policy covering Cambridge and South Cambridgeshire that National Green Belt purpose 4, to preserve the setting and special character of historic towns, is of particular relevance to Cambridge so it is unsurprising and entirely justified that the majority of the qualities identified in section 5.0 of the LDA Study relate to setting and character (although many of them also relate to other purposes). There is no inherent bias in the LDA Study as a result of the number of qualities relevant to each Green Belt purpose varying, because the LDA Study does not assess the importance of areas of land by virtue of the number of Green Belt purposes they perform or the number of qualities they exhibit. For the

⁹⁹ RD/MC/030 and RD/MC/031 – the new Inner Green Belt Boundary Study 2015

same reason, the fact that some qualities relate to more than one purpose does not mean there is any double-counting in the assessment.

168. In terms of the alleged 'exaggeration of unspoilt views' from the west, there is no suggestion in the LDA Study that the construction of the M11 and other modern development has not changed these views. However, para 5.2.32 states that, because development has been limited on the west side of the city, the quality of views of that side of the historic city, with open countryside and a soft green edge, and landmark historic buildings clearly visible and largely unaffected by modern development, has remained substantially intact over the last 300 years.
169. The explanation for identifying no potential for release of land from the Green Belt in sector 3 is given at paragraph 6.6.5 of the LDA Study. Any development would remove the characteristic setting of the city, diminish (both in reality and in perception) the presence of countryside close to the distinctive core of Cambridge and obstruct key views.
170. The transport evidence submitted with the representation considers that traffic impacts are capable of mitigation, and appropriate public transport, walking and cycling improvements are capable of being implemented. The SA Site Assessment indicated that suitable access could be achieved, subject to detailed consideration through a TA as part of the planning application process. Whilst the site benefits from proximity to Cambridge, it would introduce traffic directly into an already congested network. Active mode shares in the Councils' transport modelling were particularly high, even compared with other radials. The Councils' Local Plan Transport Report November 2015 included the following explanation: The Barton Road development in Option 4 has a particularly low car mode share and high walk/cycle share. It should be noted that given that the car mode share result is especially low, it could indicate an unacceptable level of car access to this site, even in the Do Something, due to loading directly onto very busy radial routes. This would cause the model to prevent trips being made by car, especially as there are no major highway interventions coded for this site. Therefore the car mode share result should be treated with some caution as it may not be indicative of the actual benefits of this site¹⁰⁰.
171. Development of the site would have a very significant negative impact on Green Belt purposes and a significant negative impact on landscape and townscape. Development within sub areas 3.1 or 3.2 would remove the characteristic setting to the city, diminish both in reality and in perception, the presence of countryside close to the distinctive core of Cambridge and obstruct key views. Within sub area 3.2, development would also alter the characteristic approach into Cambridge along Barton Road. Within sub area 3.3, development would impact on the relationship with the distinctive townscape within the West Cambridge Conservation Area and would remove the closest area of countryside to the historic core. The locational advantages of large scale development on the edge of Cambridge are not considered to outweigh its negative impact on the purposes of the Cambridge Green Belt taking account of reasonable alternatives for both housing and economic development.

¹⁰⁰ Local Plan Transport Report November 2015 (RD/MC/070) page 53 para 5.63 footnote

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172. The site is not required to meet objectively assessed need for homes in the plan period. The site does not need to be allocated to make the plan sound.

Matter M11.4 Cambridge South East

M11.4i

Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?

Commercial Estates Group represented by Lichfields

Cambridge Reps:
28076 (Policy 1)

South Cambridgeshire Reps:
60927 (Policy S/6)
60873 (Policy S/4)

Summary of promoters' proposal

173. The site is proposed for a mixed use sustainable urban extension with the potential to deliver 3,300 to 4,400 homes and 10ha of employment land, new community facilities, neighbourhood and local centres, 60 ha Country Park and a network of formal and informal open space.
174. The omission site is shown on the map in Appendix 2.
175. The site was submitted to the Councils in response to their 'call for sites' when preparing their respective Strategic Housing Land Availability Assessments (SHLAA).

Issues and Options consultations 2012

176. The Councils' separate consultations both asked if any of ten broad locations around the edge of Cambridge had potential to be released from the Green Belt to provide new housing to meet housing needs¹⁰¹. Cambridge South East being broad location 7.
177. In summary the Issues and Options consultations resulted in the following representations¹⁰²
City: Support: 5, Object: 38
SCDC: Support: 6, Object: 69, Comment: 3

ARGUMENTS IN SUPPORT:

- Logical extension to City without compromising neighbouring necklace villages;
- Could help meet housing and employment development needs of Cambridge;
- Deliverable in plan period;

¹⁰¹ Issues and Options Reports for both Local Plans June/July 2012 (SCDC RD/LP/030 page 43, CCC RD/LP/240 page 59)

¹⁰² RD/Sub/SC/060 Draft Final Sustainability Assessment (March 2014) Annex B, Site Assessments for edge of Cambridge sites - Broad location 7 from page B2377 and RD/Sub/C/080 Cambridge City Council Statement of Consultation and Audit Trails, from page 784. Summary of Issues and Options 2012 comments on broad locations in the Green Belt.

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- Could provide for up to 4,000 new homes in a sustainable location close to the jobs at the Addenbrooke's Hospital, Marshalls and ARM;
- Would allow for expansion of Peterhouse Technology Park;
- Can provide significant open space and recreation areas;
- Well landscaped sensitive development acceptable;
- Already compromised;
Could minimise the starkness of Addenbrooke's;
- Low lying land development would have less impact.

OBJECTIONS:

- No exceptional case exists to justify more Green Belt development;
- No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages);
- Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in Green Belt villages would be less harmful;
- New development would detract from the historic character of Cambridge;
- Very important to the special character and setting of Cambridge as elevated with important views;
- Majority of land is elevated with important views -development could not easily be screened from other vantage points;
- Worts' Causeway and minor road over hill towards Fulbourn provide a well-used route for leisure access to countryside and development along this corridor would have a significant negative impact;
- Harmful to setting and character of Fulbourn;
- Contrary to the conclusions of earlier Green Belt studies and to those of the Inspector when considering proposals for housing at Netherhall Farm in 2006;
- Important for amenity and recreation;
- Impact on tranquillity of the countryside;
- Impact on traffic;
- Harmful to views from the Gogs and Wandlebury and of high landscape value;
- Damage to biodiversity and Nature Reserves.

COMMENTS:

- The part of the area either side of Worts' Causeway which is on level ground would seem to be the most unobtrusive of all the sites.
- Minor development on non-elevated land would be acceptable if done with sensitivity to preserve the best of the landscape.

Councils' Joint Issues & Options 2: Part 1 consultation 2013

178. A technical assessment of a range of sites was undertaken having regard to the comments submitted in response to the Issues & Options consultations in summer 2012 on the ten broad locations in the Green Belt on the edge of Cambridge. The sites assessed were those submitted to the Councils' as part of the 'call for sites' when preparing their respective SHLAAs and any land identified through the new Green Belt review as fulfilling Green Belt purposes to a lesser degree.

179. The omission site was considered through the joint combined Green Belt Site and Sustainability Appraisal Assessment Proforma¹⁰³ (as sites CCC911, SC111 and SC284). These sites were identified taking account of developer proposals following the SHLAA 'call for sites', as well as additional potential options. Where falling across district boundaries the sites were broken up into separate land parcels. A joint site testing proforma was developed for the purpose of testing edge of Cambridge sites. The criteria in the proforma took into account the social, environmental and economic sustainability themes and objectives identified in the SA scoping reports of both Councils, as well as deliverability and developability of sites. It included a two stage assessment, where sites failing the first stage were rejected from further consideration as potential allocations (although the remainder of the assessment was completed for each site).
180. The main planning constraints and adverse impacts identified were:

CCC 911 Fulbourn Road, r/o Peterhouse Technology Park	<ul style="list-style-type: none">Very significant impact on Green Belt purposes.Large part of site constrained by Cambridge Airport public safety zone.Further than 800m to access GP surgery.Significant air quality impact.Loss of protected open space, but this could be mitigated because the site is large.The site does not have access to high quality public transport, and poor cycle access
SC 111 Land south of Cambridge Road, Fulbourn	<ul style="list-style-type: none">Very significant impact on Green Belt purposes.Site is not near to local facilities such as district / local centre, GP surgery and primary school, and due to its size it is less likely to be able to provide for new facilities.Cycle access is poor.Loss of Grade 2 agricultural land.
SC 284 Land south of Worts Causeway	<ul style="list-style-type: none">Very significant impact on Green Belt purposes.Site is not near to local facilities such as district / local centre & GP surgery.Also scores badly on a local wildlife site, green infrastructure and biodiversity.

181. The Green Belt appraisals in the assessment proformas were informed by two studies, the Cambridge Inner Green Belt Boundary Study 2012¹⁰⁴ and the Cambridge Green Belt Study 2002¹⁰⁵.
182. The sites were assessed as having no significant development potential (significant constraints and adverse impacts - scored Red).
183. An objection was received from the site promoter to the Issues & Options 2: Part 1 consultation which is summarised in the South Cambridgeshire Draft Final

¹⁰³ Issues and Options 2 Part 1 Joint Consultation on Development Strategy & Site Options on the edge of Cambridge January 2013, Technical Background Document Part 1 (RD/LP/170 from pages 445, 471 and 486, maps included)

¹⁰⁴ RD/Strat/210 Sector 8

¹⁰⁵ RD/Strat/180

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Sustainability Appraisal Report¹⁰⁶ and Cambridge Statement of Consultation¹⁰⁷ as follows:

“Commercial Estates Group - The summary assessment of BL7, land between Babraham Road and Fulbourn Road is flawed as it did not take into account the detailed submissions to a previous consultation in particular the scope for the development to provide self sustaining services. No overarching SA has been undertaken to look at the implications of the current development strategy before considering any departure. The assessment of impact against the Air Safeguarding Zone is flawed in that it represents a consultation zone with airport authorities. The site has been classified as not having access to high quality public transport even though it is close to the park and ride and has poor cycle access. The assessment of Green Belt in Chapter 7 is skewed in significance of the contribution BL7 makes to green belt purposes.”

184. The Councils' response to representations on rejected sites in broad location 7 (land between Babraham Road and Fulbourn Road) is outlined in the South Cambridgeshire Draft Final Sustainability Appraisal Report¹⁰⁸ and Cambridge Development Plan Scrutiny Sub-Committee Report 29 May 2013¹⁰⁹.

Proposed Submission Local Plans 2013

185. The site as a whole was not included in the Proposed Submission Local Plans, but parts of it have been included as site allocations in the Cambridge Local Plan as sites GB1, GB2, GB3 and GB4, and in the South Cambridgeshire Local Plan as site E/2 (as proposed to be modified¹¹⁰). These sites were examined at the Matter 6 hearings in 2015, the Matter 8 Housing Land Supply and Delivery hearings in 2015, and for site E/2 at the Matter SC7 hearings in March 2017.

Representations Received on Proposed Submission Local Plans

186. The site promoter objected to the rejection of this site (including reps CCC 28076, SCDC 60927 and 60873).
187. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 60927). Key reasons for objection were:

¹⁰⁶ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 4, page A1314

¹⁰⁷ Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080), page 793

¹⁰⁸ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 4, page A1320-A1321

¹⁰⁹ Development Plan Scrutiny Sub Committee Report 29 May 2013 - Cambridge Local Plan– Draft Local Plan Including The Preferred Approach To The Spatial Strategy, Vision And Objectives (RD/CR/380)

¹¹⁰ South Cambridgeshire Local Plan – Schedule of Modifications March 2016 (RD/MC/150) - Modification PM/SC/8/C page 65

- Alternative Site: EDGE OF CAMBRIDGE - Land East and West of Cherry Hinton Road/South of Wort's Causeway
 - CEG has identified Cambridge South East as a location to accommodate sustainable patterns of development. Its analysis demonstrates how land east and west of Cherry Hinton Road/South of Wort's Causeway could accommodate sustainable development and facilitate economic growth. Releasing land from the Green Belt in this location would support a mixed used scheme across the administrative boundary, as detailed in CEG's Synopsis and Vision Documents
 - This allocation would promote residential-led development in a highly sustainable location consistent with national policy.
 - A new policy should be added to the draft Plan, and the Proposals Map and Key Diagram modified accordingly.
 - This representation is accompanied by a suite of evidence-based documents prepared by CEG's professional team which amplify and justify the representation made to this and other policies.
188. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 60873). Key reasons for objection were:
- CEG supports the principle and purposes of the Cambridge Green Belt. There is however a need to accommodate growth and facilitate sustainable patterns of development, consistent with national planning policies the NPPF.
 - As the Council recognises in Para 2.31, the NPPF states that, when drawing up of reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. There is insufficient evidence that this important policy principle has been taken into consideration in the preparation of the Plan, and analysis commissioned by CEG which is submitted as an evidence base to support its representations indicates that some areas of the Green Belt could be released to facilitate sustainable development, including land South East of Cambridge.
 - This representation is accompanied by a suite of evidence-based documents prepared by CEG's professional team which amplify and justify the representation made to this and other policies.
189. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 28076). Key reasons for objection were:
- CEG supports sustainable development, and would support a spatial strategy which delivers this. Policy wording is consistent with NPPF objectives, but its principles are not carried through the rest of the Plan.
 - CEG has identified sites at Cambridge South East which are deliverable within the plan period and capable of providing significant social, economic and environmental benefits through a residential-led sustainable mixed use development. This representation is accompanied by evidence-based documents prepared by CEG's professional team which amplify and justify the representation made to this and other policies.

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190. The Councils considered the representations, but did not consider that the site needed to be included in the Proposed Submission Plans to make the plans sound¹¹¹.

Submitted Local Plans 2014

191. The site was not included in the submitted Cambridge or South Cambridgeshire Local Plans.

Consideration since the Local Plans were Submitted

Local Plan hearings

192. Matters and issues relevant to Cambridge South East have been considered at previous examination hearings. The Councils have prepared statements in response to all of these Matters and Issues.

Inspector's letter 20 May 2015

193. The Inspectors wrote to the Councils on 20th May 2015¹¹² with concerns regarding a number of matters including the overall development strategy, the appraisal of all reasonable alternatives (including sites on the edge of Cambridge), the methodology of the Cambridge Inner Green Belt Boundary Study 2012 and the infrastructure requirements and sustainable transport options for the new settlements. In June 2015¹¹³ the Councils wrote to the Inspectors setting out a programme of work to address these concerns including preparation of a Green Belt review, preparation of a Transport report, and preparation of an addendum to the SA, informing a review of the development strategy. In July 2015¹¹⁴ the Inspector's formally suspended the examinations until March 2016.

Cambridge Inner Green Belt Boundary Study (November 2015)¹¹⁵

194. The Inspectors' letter raised questions about the methodology of the Cambridge Inner Green Belt Boundary Study 2012. In response the Councils commissioned a new assessment of the Inner Green Belt Boundary by LDA Design¹¹⁶. The methodology of the study was examined at the Matter PM2 hearings in June 2016.
195. The study's conclusions regarding the Cambridge South East site are set out in regard to Sectors 11, 12 and 13 from page 131. The study notes that these sectors (Sectors 11, 12 and part of sub area 13.1) play a key role in the setting of the south east of Cambridge, with the slopes of the distinctive Gog Magog Hills forming the

¹¹¹ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 8 Responding to Proposed Submission Representations on Sites not Included in the Plan, pages A1604-A1605 AND Cambridge Full Council Committee Report 13 February 2014 (RD/CR/450)

¹¹² RD/Gen/170

¹¹³ RD/Gen/180

¹¹⁴ RD/Gen/200

¹¹⁵ Cambridge Inner Green Belt Boundary Study (RD/MC/030)

¹¹⁶ Cambridge Inner Green Belt Study 2015 (RD/MC/030) pages 110-114

backdrop to views out from and across Cambridge in this direction. These sectors also prevent the continued sprawl of Cambridge to the south east, halting expansion in this direction and ensuring that the distance between the historic core and the edge of Cambridge does not extend further than it is at present. Sector 13 plays a key role in the remaining separation between Cambridge and Fulbourn, as well as the setting of the windmill on Mill Hill and the Conservation Area at Fulbourn Hospital.

196. It states that any form of development extending onto the slopes of the Gog Magog Hills would substantially harm one of the key components of the setting of the city. No Green Belt release should be contemplated in the majority of sectors 11, 12, or 13. The study provides parameters for land which could be released from the Green Belt in parts of all three sectors. The proposed allocations on sites GB1, GB2, GB3, GB4 and E/2 (as proposed to be amended) are consistent with these parameters which have already been subject to examination at earlier hearings. To add greater clarity to the parameters for green belt release included in the November 2015 study in light of representations from the site promoter, revised wording in relation to sector 11 was included in the March 2016 Supplement to the Cambridge Inner Green Belt Boundary Study¹¹⁷.

Cambridge and South Cambridgeshire Local Plans Transport Report¹¹⁸

197. The Local Plan Examination Inspectors' Preliminary Conclusions (20 May 2015) sought to ensure that the sustainability implications of different development strategy options had been fully considered, including comparisons of strategy options which include development on the edge of Cambridge. It also stated that if development is to be directed to new settlements rather than the edge of the urban area, that the challenges of making such development as sustainable as possible have been addressed, in particular infrastructure requirements and sustainable transport options.
198. In response to the Inspector's letter, the Council prepared a suite of new evidence, including a new consolidated Modelling Report / Local Plan Transport Assessment. This included modelling to compare different strategy options, including significant edge of Cambridge focused options with new settlement or village focused strategies.
199. The Phase 2 2015 model runs included a south east radial focus (option 6)¹¹⁹ incorporating the representor's proposal. In order to consider the transport impact of option 6, this resulted in a package of mitigation measures being identified¹²⁰. For the Cambridge South East proposal, this included site access arrangements, public transport, walking and cycling improvements. In addition, it was considered that a strategic link road would be required between Addenbrooke's Road and Yarrow Road.

¹¹⁷ RD/MC/031 from page 10 Item 3

¹¹⁸ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060)

¹¹⁹ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060) table 5-1 Page 44, and figure 5-4 page 46

¹²⁰ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060) table B.3 Page 87

200. The edge of Cambridge major development areas tested in the options, including option 6, showed higher mode shares for active travel modes than new settlements or villages for trips to Cambridge¹²¹. However, the overall difference in the number of vehicle trips generated by the different strategy options tested was less marked, with a broad level of consistency in level of forecast traffic growth in each of the phase 2 development scenarios.¹²².

Sustainability Appraisal Addendum Report and Supplement (Addendum November 2015 / Supplement March 2016)¹²³

201. The Councils prepared an SA Addendum Report that takes account of the additional evidence that has been undertaken in response to the Inspectors' concerns. All sites throughout the development sequence are assessed in a consistent way.
202. An updated combined Green Belt Site and Sustainability Appraisal Assessment Proforma of the site is included in the Cambridge and South Cambridgeshire Local Plans SA Addendum Report (November 2015/March 2016) which took account of this new Green Belt study. The assessment finds that development of the site would have a very significant negative impact on Green Belt purposes. Appendix 10 of the Addendum Report from page 253 shows how the Council has addressed representations from the site promoter regarding the proforma assessment of this site. No changes to the proforma assessment scores were found to be justified.
203. The SA addendum Report assessed the potential of this site to accommodate 3,000-4,000 homes south east of Cambridge and 10 ha employment land (identified in the submitted Local Plans). New community facilities and neighbourhood and local centres. A country park of 60ha, and a network of formal and informal open space. Some of the key issues identified in the SA Addendum Report for this site are set out below:
- **Air Quality:** The development will have a significant adverse impact on air quality and the AQMA due to major transport impact.
 - **Impact on designated sites:** There is a large nature area immediately adjacent to the north-west boundary on Limekiln Hill which includes the East Pit and Limekiln Hill Sites of Special Scientific Interest (SSSI's). A large SSSI exists south of Worts Causeway within SCDC focusing on the Gog Magogs golf course. Area is adjacent to a number locally designated sites (some of which overlay each other) including Sites of Special Scientific Interest (East Pit and Limekiln Hill), Local Nature Reserves (Cherry Hinton Pits, Beechwoods), Protected Roadside Verges (Worts Causeway, Limekiln Hill), County Wildlife Sites (Netherhall Farm).

¹²¹ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060) figure 5-11

Page 54

¹²² Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060) para 5.68 page 56

¹²³ Cambridge and South Cambridgeshire Local Plans SA Addendum Report RD/MC/020 (November 2015), and its supplement from November 2016 RD/MC/021 Annex 1 part 2 page 266 (combined site assessment site reference CCSC1005)

- **Green Belt:** Very high and high impacts on Greenbelt purposes (very significant negative impact)
- **Heritage:** Significant prehistoric sites known on the chalk south of Cherry Hinton Road: former site of 'War Ditches' Iron Age hill fort was partially excavated in early 20thC ahead of clunch extraction on Lime Kiln Road (Monuments in Cambridge - MCB5999).

Evidence of a massacre at the site. Cropmarks of Bronze Age round barrow groups (burial mounds), now ploughed flat, are evident in several places in this allocation area (e.g. MCBs 3446, 6004, 13462 and those excavated in advance of Peterhouse Technology Park ECB357 (ECB – Events Cambridge). Field scatters of prehistoric stone implements throughout. Worsted Street Roman Road (part of Via Devana - Godmanchester to Colchester Road) traverses the site and likely to have roadside settlements along its route.

A programme of archaeological works should be undertaken prior to the submission of any planning application. Abuts Fulbourn Hospital CA. Adverse effect to setting of Conservation Area due to loss of significant open land providing rural backdrop for the designed landscape of Fulbourn Hospital.

- **Flood risk:** Significant site regarding surface water flooding in the wider area as runoff contributes to surface water flooding of the existing built environment. Could potentially offer a solution and flood risk management benefit, but may impact on achievable densities as great level of green infrastructure required.
- **Transport:** The site scores well against the sustainable transport score for South Cambridgeshire, which measures access to and quality of public transport and cycling.

204. The representation from CEG to the Proposed Modifications proposed to expand sites GB1 and GB2, in effect delivering a smaller development than their original proposal, which they argued was consistent with the parameters identified in the Inner Green Belt Study 2015. The consultation did not invite alternative or modified sites and the alternative site has no status. However, for the avoidance of doubt, in considering the representations the Councils concluded that the Cambridge Local Plan proposed allocations reflect a correct interpretation of the parameters whilst CEG's interpretation is incorrect. Whilst it is believed the parameters in the Study are clear, they were reviewed by the study authors, LDA Design, in the light of CEG's misinterpretation and the Supplement to the LDA Design Study (RD/MC/031) provides additional greater clarity^[2]. For completeness the Councils undertook an assessment of the alternative proposal (CCSC1005a). In addition the Councils responded to issues raised regarding the approach to SA assessment of their site which can be found in the SA Addendum Report at Appendix 10 of the main report PDF page 258^[1].
205. The overall conclusion of the SA assessment in regard to the sustainability of different development locations are summarised in paragraph 5.4.3 as follows:

^[2] Proposed Modifications Report on Consultation March 2016 (RD/MC/120) Councils Response to PM/SC/2/C Page A116, PM/CC/2/E Page A41 and Cambridge Inner Green Belt Study Supplement (March 2016) pages 10-12.

^[1] Sustainability Appraisal Addendum Report (updated March 2016) (RD/MC/021) Appendix 10 page 279

"The assessment concludes that the most sustainable level of the development sequence is within Cambridge. Development will have many sustainability benefits including protecting the distinctive setting of Cambridge through safeguarding the Green Belt and the associated biodiversity of the Green Belt".

"With regard to the edge of Cambridge, the assessment has confirmed that there are sustainability benefits to development on the edge of Cambridge. With regard to transport, development on the edge of Cambridge remains the best performing option with regard to modal share and performs positively due to short distances to the city, low public transport journey times, and in many cases proximity to high frequency public transport. However, the modal share results hide the fact that these locations are in already congested areas of the city where there is little scope to create more capacity for more cars, forcing new trips to be undertaken by active modes. The Local Plans CSRM report shows that different development options do not result in radically different levels of traffic growth, travel times or delay. Whilst there are variations, these are in the context of very high overall traffic growth where significant amounts of development are already committed. Viability evidence has confirmed that sites on the edge of Cambridge do offer higher sales values than options further from the city meaning facilities and infrastructure are more viable. This offers benefits in terms of potential to secure higher funding through Community Infrastructure Levy (CIL) / Section 106.

Cambridge is proposing to secure a higher rate of CIL than South Cambridgeshire, and this higher rate has the potential to be applied to edge of Cambridge sites. However, the Cambridge Inner Green Belt Boundary Study (2015) has concluded that it is unlikely that any development within identified sectors (apart from a few small exceptions) could be accommodated without substantial harm to the Green Belt purposes. Therefore, the conclusions remain that, notwithstanding some of the positive sustainability effects that development on the edge of Cambridge demonstrates, it would not be possible to deliver significant additional development here without significant detriment to the specific purposes of the Cambridge Green Belt".

206. The paragraph also looks at new settlements and village sites.
207. At paragraph 9.4 the report sets out the reason for selection of the preferred strategy to the location of development set out in the Local Plans as follows:

"The Councils acknowledge the advantages of edge of Cambridge sites in terms of accessibility to jobs and services in the urban area. The Councils have also taken account of the constraint imposed by the purposes of the Cambridge Green Belt and the level of harm that large developments within the currently designated Green Belt would have. However, this factor itself has been balanced against the need to promote sustainable patterns of development and the consequences of channelling development to locations outside the Green Belt. Consideration of sustainability must take account of the full range of economic, social and environmental issues. NPPF paragraph 152 requires Local Planning Authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided

and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

In the context of all evidence now available, the Councils have considered the merits of edge of Cambridge sites and the locational advantages they offer, against the significant harm that would be caused by substantial development on the edge of Cambridge to the purposes of the Cambridge Green Belt. Additional new settlements offer sufficient benefits in terms of critical mass, services and facilities and opportunities to deliver high quality transport improvements. The Councils consider that the need for jobs and homes could in principle provide a justification for review of the green belt boundary. However whether in fact such a release is appropriate involves balancing other consideration including impact of release on the purpose of the Cambridge green belt, the accessibility advantages of locating development on the edge of the urban area and reasonable alternatives. The result of this balancing exercise has led the Councils to conclude that only small scale green belt released at locations where harm to the purposes of the green belt designation would be appropriate".

Cambridge and South Cambridgeshire Development Strategy Update¹²⁴

208. This document describes the key evidence documents related to the alternative development strategies, and provides a summary of key issues in relation to each stage of the development sequence. It summarises the role of sustainability appraisal in the plan making process, and key findings in relation to the development sequence.
209. Drawing on the evidence base, it then considers in Section 3 the consequences and issues related to the strategic choices available to the Council, including the consideration of sustainable patterns of development (as required by NPPF paragraphs 84 and 85) in the context of an area with a tightly drawn Green Belt around the historic city of Cambridge. It identifies the reasons for the preferred approach of the Councils in the submitted plans and having considered the issue afresh, taking account of the additional work undertaken. It concludes that the Councils have carried out or commissioned new studies to review the evidence on objectively assessed housing needs, Green Belt, transport, infrastructure and viability to ensure that the decision on the preferred strategy is based on a full understanding of the implications of the different strategy options. An addendum to the Sustainability Appraisal has also been carried out to ensure that the sustainability issues of the options available to the Councils are understood, in particular of land on the edge of Cambridge and at new settlements.
210. The Councils have been clear that they recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation, although it makes clear that major new development on the edge of Cambridge on congested radial routes have their own transport issues and are not necessarily cheap to deliver¹²⁵. The independent Green Belt evidence supports the findings of the Councils' own evidence that the release of land on the edge of Cambridge can be

¹²⁴ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060)

¹²⁵ See for example paragraph 22 of the Councils Matter 7 Transport statement

expected to compromise substantially the purposes of the Cambridge Green Belt, with two exceptions. One to reduce the size of an allocation in the submitted South Cambridgeshire Local Plan and one to allocate a new employment allocation as an extension to the Cambridge Biomedical Campus.

211. The evidence also looks at the potential to deliver sustainable new settlements, as an alternative to sites on the edge of Cambridge. It concludes that they can provide viable and deliverable developments, that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, that will attract significant levels of patronage and also provide wider benefits to existing communities. The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.
212. Having weighed all those factors, the Councils maintain their view that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period. The strategy will provide a range of deliverable sites for the plan period and beyond, and the Councils consider that sustainability will be secured.

Assessment and Conclusion

213. It is not necessary to allocate the omission site to make the plan sound. It has been demonstrated through the plan making process that there are better alternatives available to meet development needs. Neither is it necessary to allocate extended sites GB1 and GB2 as advocated by Commercial Estates Group (rep in response to the Proposed Modifications 65996, January 2016). The boundary of these sites was examined in relation to Matter 6 in February 2015.
214. The SHLAA (including the combined Green Belt Site and Sustainability Appraisal Assessment Proforma) and SA provide a robust assessment of the omission site and comparison with alternatives subject to the considerations set out in this statement.
215. A number of criticisms of the November 2015 Inner Green Belt Boundary study were made by the promoter of this site in response to the proposed Modifications consultation (Reps 66007, and 65996, and Cambridgeshire County Council reps 66126 and 66127). Whilst methodological concerns were primarily addressed at the PM2 Green Belt Review Methodology hearing in June 2016 a number of closely related site specific concerns were also made to the effect that the assessment of sectors 11, 12 and 13 in the study are not appropriate, that sites allocations GB1 and GB2 should be more extensive, and that the original boundary of employment allocation E/2 should be reinstated.
216. Paragraph 2.33 of the Representations Document appended to the CEG rep 65996 quotes from para 6.14.6 of the LDA Study¹²⁶ which explains why the parameters would avoid significant harm to Green Belt purposes. In quoting the third point ('The

¹²⁶ RD/MC/030

rising topography of the Gog Magog hills would be kept open...') the CEG Representation omits the words '... open rural land would be retained at the foot of the hills, protecting the foreground in key views and those of more localised importance'.

217. The extended GB1 and GB2 allocation proposed by CEG at the Proposed Modifications consultation in 2015 also fails to take account of several aspects of the LDA study parameters:
- The second parameter states 'Land along the western edge of sub-area 11.2 could be released for development'. The release proposed by CEG is not restricted to the western edge of sub area 11.2.
 - The second parameter requires the retention of 'a substantial buffer' as Green Belt between the new urban gateway and the Park & Ride site. Figure 3.1 on page 24 of the CEG Representation shows the retention of only a relatively narrow buffer.
218. The second parameter makes clear that the remainder of sub area 11.2 should remain as Green Belt for various reasons, including to prevent excessive loss of rural land at the foot of the Gog Magog Hills – the selective quote at CEG's paragraph 2.33 indicates that this point has not been fully taken into account.
219. The third parameter makes clear that any release of land in sub area 11.1 should be limited to the western edge, which is not reflected in the CEG proposals.
220. The City Council's proposed allocations GB1 and GB2 draw a straight line from the south-east side of the existing farm buildings on Babraham Road to the existing eastern edge of development along Beaumont Road. This is a correct interpretation of the LDA study parameters for green belt release, whilst CEG's interpretation is not.
221. The location of the boundary of employment allocation E/2 south of Fulbourn Road in regard to Green Belt considerations was fully explored at the matter SC7 hearing in February 2017.
222. Cambridgeshire County Council have proposed a larger site GB2. The proposed wider extension is inappropriate for the reasons set out above. The inclusion of the existing farm buildings, farmyard and curtilage within site GB2 is consistent with the parameters for a Green Belt release in sub area 11.2 set out in the LDA study¹²⁷.
223. Development of the main omission site would have a very significant negative impact on Green Belt purposes and a significant impact on landscape and townscape. Any form of development extending onto the slopes of the Gog Magog Hills would substantially harm one of the key components of the setting of the city. No Green Belt release should be contemplated on the sloping or elevated landform in the eastern part of sub area 11.1 or 13.1, or the majority of Sector 12. The locational advantages of large scale development on the edge of Cambridge are not considered to outweigh

¹²⁷ Proposed Modification PM/CC/B/B Increase the size of site GB2 to include Newbury Farm (0.9 hectares) - Cambridge Local Plan Proposed Modifications (March 2016) (RD/MC/140)

its negative impact on the purposes of the Cambridge Green Belt taking account of reasonable alternatives for both housing and economic development.

224. The SA Site Assessment¹²⁸ indicated that transport impacts were capable of mitigation. A full Transport Assessment would be required for any development on this site and would need to model the impact of the proposed development on junction capacities on the local highway network. The Transport Assessment would need to identify the mitigation strategy needed to cater for the trip generation predicted, this would need to consider all modes of travel including highway and junction improvements as well as improvements to the walking, cycling and public transport networks in order to cater for the traffic generation of the proposed site and encourage mode shift away from the car especially for trips into Cambridge.
225. The SA assessment also states that significant congestion already occurs in this quadrant of Cambridge which is likely to be exacerbated by the full build out of the planned and approved developments. These developments have already been through their TA process to consider their impacts. While the substantial sustainable improvements that are identified for the A1307 and Cherry Hinton Road corridors through the City Deal Programme may provide some headroom, any TA will need to carefully examine and clearly demonstrate how the site can be delivered without having severe impact on the surrounding transport networks.
226. CEG indicate in their transport evidence that they consider that Cambridge South East can be integrated into the urban fabric, with much less infrastructure investment or public transport interventions than other sites. In their transport evidence document submitted with their representation, they indicate a total transport package of £4m to £6m highways, public transport, and pedestrian/cycling improvements. Advice from the Local Highways Authority is that more substantial measures would be required, which would likely be significantly more expensive. Whilst the site benefits from proximity to Cambridge, it would introduce traffic directly into an already congested network.
227. The site is not required to meet objectively assessed need (for homes and economic development) in the plan period. The site does not need to be allocated to make the plan sound.

¹²⁸ Cambridge and South Cambridgeshire Local Plans SA Addendum Report RD/MC/021 Annex 1 part 2 page 266 (combined site assessment site reference CCSC1005)

Matter M11.5 Land at Fen Ditton

M11.5i

Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?

Quy Estate represented by Carter Jonas LLP (Mr Richard Seemark)

South Cambridgeshire Reps:

63071 (Policy S/6: The Development Strategy to 2031)

Cambridge Reps:

27995 (Proposed Submission - Policy 1: The Presumption in Favour of Sustainable Development)

Summary of promoters' proposal

228. The latest proposal in October 2013 was for small-scale residential-led mixed use development. It is proposed that land around the village could provide 400-500 new homes (including affordable homes).
229. The omission site is shown on the map in Appendix 2.
230. The site was submitted to the Councils in response to their 'call for sites' when preparing their respective Strategic Housing Land Availability Assessments (SHLAA). The SHLAA submission for the site made in July 2011 was for residential development.

Issues and Options consultations 2012

231. The Councils' separate consultations both asked if any of ten broad locations around the edge of Cambridge had potential to be released from the Green Belt to provide new housing to meet housing needs¹²⁹. Land at Fen Ditton being broad location 9.
232. In summary, the Issues and Options consultations¹³⁰ for Broad Location 9¹³¹ resulted in the following representations:
City: Support: 4, Object: 22
SCDC: Support: 9, Object: 43, Comment: 6

ARGUMENTS IN SUPPORT:

- Sustainable location to provide much needed homes and/or employment for the Cambridge area;

¹²⁹ Issues and Options Reports for both Local Plans June/July 2012 (SCDC RD/LP/030 page 43, CCC RD/LP/240 page 59)

¹³⁰ Technical Background Document to the Cambridge City Council and South Cambridgeshire District Council - Issues and Options 2 Part 1 Joint Consultation On Development Strategy & Site Options on the Edge Of Cambridge January 2013. RD/LP/170. Pages 646-648

¹³¹ Broad location 9 includes a number of sites, the two largest of which SC159 and SC160 are sites proposed for development by the Quy Estates

Matter M11: Joint Omission Sites

Statement by South Cambridgeshire District Council and Cambridge City Council

June 2017

- Could provide a foot/cycle bridge over the river Cam to link to the Science Park and the new rail station;
- Could help meet development needs of Cambridge including affordable housing;
- Development would retain a strategic green edge along A14, thereby preserving openness of immediate area and wider landscaped setting of Cambridge;
- Well landscaped sensitive development acceptable;
- Little impact on character / townscape and landscape setting of city subject to landscape and woodland buffers.

OBJECTIONS:

- No exceptional case exists to justify more Green Belt development;
- No need for development here, development can be accommodated elsewhere in Cambridge and South Cambridgeshire (in the City, at new settlements and in villages);
- Fen Ditton is a historic settlement, most of which has been designated a Conservation Area. Additional housing development of any size in this area would subsume Fen Ditton into the city;
- Harmful to Green Belt purpose of protecting the character and setting of a historic city, development in (other) Green Belt villages would be less harmful;
- Harmful to Green Belt purpose of maintaining rural setting of Fen Ditton;
- Importance of Green Belt has been examined through South Cambridgeshire District Council Local Development Framework and through various planning applications, which have dismissed development as inappropriate.
- Negative impact on East Cambridge road network, which is one of the most congested in the city;
- Existing public transport links are minimal (2 buses a day) and unable to support an enlarged settlement travelling for employment;
- The infrastructure could not support any further development.
- Would lead to urban sprawl, Cambridge could accommodate more by building taller;
- Inadequate roads and other transport links;
- Would lead to congestion, existing traffic bottleneck at the bottom of Ditton Lane at peak times, and bus services are likely to be reduced in near future;
- Unsustainable location, the only bus is about to be withdrawn, there is no village shop, the sewage system is overburdened and inadequate, and the B1047 already carries a heavy vehicular load;
- Commons on the river corridor are essential open space for the city;
- Noise from the A14;
- Open and rural nature of land between Chesterton and Fen Ditton is highly prized and has been identified by local and city people as essential open space.

COMMENTS:

- Hard to comment without knowing potential dwelling numbers;
- Development might be possible if Fen Ditton village can be adequately protected and significant improvements are made to the transport system.
- There must be a 'buffer zone' between development and the edge of the River to preserve rural character of the Green Corridor.

Councils' Joint Issues & Options 2: Part 1 consultation 2013

233. A technical assessment of a range of sites was undertaken having regard to the comments submitted in response to the Issues & Options consultations in summer 2012 on the ten broad locations in the Green Belt on the edge of Cambridge. The sites assessed were those submitted to the Councils' as part of the 'call for sites' when preparing their respective SHLAAs and any land identified through the new Green Belt review as fulfilling Green Belt purposes to a lesser degree.
234. The omission site was considered through the joint combined Green Belt Site and Sustainability Appraisal Assessment Proforma¹³² (as sites SC159 and SC160). These sites were identified taking account of developer proposals following the SHLAA 'call for sites', as well as additional potential options. Where falling across district boundaries the sites were broken up into separate land parcels. A joint site testing proforma was developed for the purpose of testing edge of Cambridge sites. The criteria in the proforma took into account the social, environmental and economic sustainability themes and objectives identified in the SA scoping reports of both Councils, as well as deliverability and developability of sites. It included a two stage assessment, where sites failing the first stage were rejected from further consideration as potential allocations (although the remainder of the assessment was completed for each site).
235. The main planning constraints and adverse impacts identified were:

SC159 - Land at Fen Ditton (west of Ditton Lane)

- Very significant impact on Green Belt purposes.
- Distant from existing services and facilities.
- Significant Conservation constraints.
- Significant negative impact on Listed Buildings.

SC160 - Land at Fen Ditton (east of Ditton Lane)

- Very significant impact on Green Belt purposes.
- Significant negative impact on Listed Buildings.
- Distant from Secondary School.
- Significant Conservation constraints
- Air quality issues near the A14
- Loss of agricultural land

236. The Green Belt appraisals in the assessment proformas were informed by two studies, the Cambridge Inner Green Belt Boundary Study 2012¹³³ and the Cambridge Green Belt Study 2002¹³⁴.
237. The sites were both assessed as having no significant development potential (significant constraints and adverse impacts – scored Red).

¹³² Issues and Options 2 Part 1 Joint Consultation on Development Strategy & Site Options on the edge of Cambridge January 2013, Technical Background Document Part 1 (RD/LP/170 from pages 531 and 547, maps included)

¹³³ RD/Strat/210 Sector 18

¹³⁴ RD/Strat/180

Matter M11: Joint Omission Sites

Statement by South Cambridgeshire District Council and Cambridge City Council

June 2017

238. An objection was received from the site promoter to the Issues & Options 2: Part 1 consultation which is summarised in the South Cambridgeshire Draft Final Sustainability Appraisal Report¹³⁵ and Cambridge Statement of Consultation¹³⁶ as follows:

“Carter Jonas (4412) and the Quy Estate (2918) - Object to the rejection of BL9, land at Fen Ditton. It is an appropriate location is suitable viable and deliverable. The Council has underestimated the opportunity provided by the Science Park Station and Chisholm Trail. Inner Green Belt Review has not taken into account that this development will keep a green wedge between the development and the A14. Development by Marshall north of Newmarket Rd will fall short of anticipated delivery. It would redress the growth imbalance between SW Cambridge and NE Cambridge.”

The Councils' response to representations on rejected sites in broad location 9 (land at Fen Ditton) is outlined in the South Cambridgeshire Draft Final Sustainability Appraisal Report¹³⁷ and Cambridge Development Plan Scrutiny Sub-Committee Report 29 May 2013¹³⁸.

Proposed Submission Local Plan 2013

239. The sites were not included in either the Cambridge or South Cambridgeshire Proposed Submission Local Plans. .

Representations Received on Proposed Submission Local Plan

240. Objections were received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representation (Rep 63071 SCDC and rep 27995 CCC). Key reasons for objection from the promoter were:

- Suitable for a residential led mixed-use development for between 400 and 500 homes on land to the north west and north east of Fen Ditton.
- Sustainable location, good transport links, limited impact on Green Belt purposes.
- Could provide a site for a new 7 form of entry secondary school to meet an identified need for school places in north east Cambridge by 2018.
- The objections are supported by the following studies:
- Land at Fen Ditton – Green Belt Assessment
- Land at Fen Ditton – Landscape and Visual Impact Appraisal
- Cambridge North East – (a summary and vision statement)

¹³⁵ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 4, page A1315

¹³⁶ Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080), page 794

¹³⁷ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 4, page A1324

¹³⁸ Development Plan Scrutiny Sub Committee Report 29 May 2013 - Cambridge Local Plan– Draft Local Plan Including The Preferred Approach To The Spatial Strategy, Vision And Objectives (RD/CR/380)

- There should be a greater variety and number of sites identified for employment development within the City and as Green Belt releases on the edge of the City to ensure that there is a flexible supply of employment sites in and around the City.
- Consideration should also be given to the potential loss of existing B1{a) buildings to C3 (residential) uses under the Government's recent introduction of new Permitted Development Rights (The Town and Country Planning (Use Classes) Order 1987 (as amended) until 30 May 2016). The simplified process of Prior Notification could potentially lead to a large loss of office stock within the City, which in turn may drive greater demand for more strategic employment sites on the edge of Cambridge.
- Cambridge City Council acknowledges that meeting the three strands of sustainability (environmental, social and economic) sets a considerable challenge for the Cambridge area and that the aim is to provide as many new homes as close to new jobs in order to minimise commuting.
- In view of this aim, it is surprising how little new housing is planned for the north of Cambridge, given that the proximity to the hi-tech cluster of the Cambridge Science Park, Cambridge Business Park, St John's Innovation Park, and the new employment development and station interchange that is likely to occur in the Northern Fringe.
- Whilst a large proportion of land around the north of Cambridge lies outside the City boundary within South Cambridgeshire, the duty of cooperation between the authorities should ensure that sites such as Land at Fen Ditton should be considered in the interests of delivering the most sustainable form of development for Cambridge/South Cambridgeshire.
- We object to paragraph 2.31 which states that Cambridge City Council does not consider that any reasonable alternatives exist for meeting the level of need. For South Cambridgeshire, the options available are considered to be the new settlements identified in the local plan and the best available sites in the better served villages. Accordingly, we object to the omission of Land at Fen Ditton as a suitable small scale fringe site on the edge of Cambridge, which in our view does provide a reasonable alternative as it is sequentially preferable to new settlements (specifically Bourne) or the better served villages.
- As described in earlier sections of this document, the Site would be accessible to new jobs and public transport, and would form a logical sequence in development between the Northern Fringe development area and Cambridge East. The small-scale release of two parcels around Fen Ditton has been assessed as having a moderate impact on the Green Belt, and would avoid the 'irreversible and adverse impact on the special character of Cambridge as a compact historic city' through the removal of large sites from the Cambridge Green Belt.
- We would support further Green Belt release on the edge of Cambridge in order to adequately accommodate the high levels of housing and economic development need in the suitable, sustainable locations. The release of further parcels of Green Belt land in highly sustainable areas should be considered more preferable than locating development in less sustainable, non-Green Belt areas.
- Accordingly, we object to the retention of Green Belt on the two parcels of Land at Fen Ditton. It has been assessed that a small scale housing-led mixed use development here would have a moderate impact upon the purposes of the Green Belt and such release would not result in the concerns regarding the irreversible and adverse impact on the special character of Cambridge as a compact historic city that may arise from large scale development. Development

Matter M11: Joint Omission Sites

Statement by South Cambridgeshire District Council and Cambridge City Council
June 2017

in this location would offer an appropriate balance in satisfying the three strands of sustainability, responding to a concern expressed by Cambridge City Council in paragraph 2.24. It would provide housing in a location accessible to existing and new jobs, proposed high quality public transport, existing and proposed social infrastructure, and could be a masterplanned in a manner that minimises impact upon the heritage assets of Fen Ditton.

241. The Councils considered the representations, but did not consider that the site needed to be included in the Proposed Submission Plans to make the plans sound¹³⁹.

Submitted Local Plans 2014

242. The site was not included in the submitted Cambridge or South Cambridgeshire Local Plans.

Consideration since the Local Plans were Submitted

243. Matters and issues relevant to Land at Fen Ditton have been considered at previous examination hearings. The Councils have prepared statements in response to all of these Matters and Issues.

Inspector's letter 20th May 2015

244. The Inspectors wrote to the Councils on 20th May 2015¹⁴⁰ with concerns regarding a number of matters including the overall development strategy, the appraisal of all reasonable alternatives (including sites on the edge of Cambridge), the methodology of the Cambridge Inner Green Belt Boundary Study 2012 and the infrastructure requirements and sustainable transport options for the new settlements. In June 2015¹⁴¹ the Councils wrote to the Inspectors setting out a programme of work to address these concerns including preparation of a Green Belt review, preparation of a Transport report, and preparation of an addendum to the SA, informing a review of the development strategy. In July 2015¹⁴² the Inspector's formally suspended the examinations until March 2016.

Cambridge Inner Green Belt Boundary Study (November 2015)

245. The Inspectors' letter raised questions about the methodology of the Cambridge Inner Green Belt Boundary Study 2012. In response the Councils commissioned a new assessment of the Inner Green Belt Boundary by LDA Design¹⁴³. The methodology of the study was examined at the Matter PM2 hearings in June 2016.

¹³⁹ South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A, Appendix 8 Responding to Proposed Submission Representations on Sites not Included in the Plan, page A1614 AND Cambridge Full Council Committee Report 13 February 2014 (RD/CR/450)

¹⁴⁰ RD/Gen/170

¹⁴¹ RD/Gen/180

¹⁴² RD/Gen/200

¹⁴³ Cambridge Inner Green Belt Study 2015 (RD/MC/030) pages 110-114

246. The study's conclusions regarding the Land at Fen Ditton site are set out from page 166 as Sector 18 - Eastern side of Fen Ditton (and specifically as sub-area 18.2 – west of the dismantled railway and part of sub-sector 18.3) and Sector 19 – West of Fen Ditton (and specifically as the majority of sub-area 19.1 – Arable land to west of Horningsea Road between A14 and village). The study¹⁴⁴ notes that for sector 18 (page 169):

The importance of the sector for Green Belt purposes:

This sector plays a key role in the setting of the north east of Cambridge, and the approach to both Fen Ditton and Cambridge along the B1047 from the north. Sub area 18.1 plays an essential role in the separation between Fen Ditton and Cambridge, being the only remaining separation between the two settlements. Sub areas 18.2 and 18.3 provide separation between the village and the A14, as well as between the future allocated edge of Cambridge and the A14, retaining a rural setting to the city when viewed from the strategic route. The sector also forms the rural setting of Fen Ditton to the east and is important in maintaining the small scale, slightly dispersed linear form of the village, which is an important component of its character.

Implications of Green Belt release for development:

It is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes. Development within sub area 18.1 would remove or reduce the remaining area of separation between Fen Ditton and the edge of Cambridge and affect the rural setting of Fen Ditton. Development within sub area 18.2 would affect the rural setting, form and character of the village, and within sub area 18.3 would affect the wider rural setting of Fen Ditton and Cambridge from the north east. No Green Belt release should be contemplated in this sector.

247. The study notes that for sector 19 (page 175):

Importance of the sector to Green Belt Purposes:

This sector plays a key role in the setting of the north east of Cambridge, the setting of Fen Ditton and the approach to the village and city along the B1047 from the north. Sub area 19.3 also plays an essential role in the separation between Fen Ditton and Cambridge, being the only remaining separation between the two settlements. The sector also forms the rural setting of Fen Ditton to the north and west and is important in maintaining the small scale, slightly dispersed linear form of the village, which is an important component of its character. The river corridor forms a key green corridor into the heart of the city and is an important route into Cambridge for pedestrians, cyclists and river users.

Implications of Green Belt release for development:

It is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes. Development within sub area 19.1 would affect the characteristic setting to Fen Ditton and the rural approach towards Cambridge. Within sub area 19.2 it would alter the highly distinctive approach into Cambridge along the River Cam and would disrupt the special

¹⁴⁴ Cambridge Inner Green Belt Study 2015 (RD/MC/030) pages 166-175 with updated text from the March 2016 Supplement RD/MC/031 at paragraphs 6.21.5 and 6.22.5

qualities of the key green corridor. Within sub area 19.3 it would remove or reduce the remaining area of separation between Fen Ditton and the edge of Cambridge. No Green Belt release should be contemplated in this sector.

Cambridge and South Cambridgeshire Local Plans Transport Report¹⁴⁵

248. The Local Plan Examination Inspectors' Preliminary Conclusions (20 May 2015) sought to ensure that the sustainability implications of different development strategy options had been fully considered, including comparisons of strategy options which include development on the edge of Cambridge. It also stated that if development is to be directed to new settlements rather than the edge of the urban area, that the challenges of making such development as sustainable as possible have been addressed, in particular infrastructure requirements and sustainable transport options.
249. In response to the Inspector's letter, the Council prepared a suite of new evidence, including a new consolidated Modelling Report / Local Plan Transport Assessment. This included modelling to compare different strategy options, including significant edge of Cambridge focused options with new settlement or village focused strategies.
250. The Phase 2 2015 model runs included a combined south radial / north east radial focus (option 5)¹⁴⁶ incorporating the representor's proposal. In order to consider the transport impact of development strategy option 5, this resulted in a package of mitigation measures being identified¹⁴⁷. For the land at Fen Ditton proposal, this included access arrangements in the do minimum option at Ditton Lane, and public transport improvements in the do-something.
251. The edge of Cambridge major development areas tested in the options, including option 5, showed higher mode shares for active travel modes than new settlements or villages for trips to Cambridge¹⁴⁸. However, the overall difference in the number of vehicle trips generated by the different strategy options tested was less marked, with a broad level of consistency in level of forecast traffic growth in each of the phase 2 development scenarios¹⁴⁹.

Sustainability Appraisal Addendum Report and Supplement (Addendum November 2015 / Supplement March 2016)

252. The Councils prepared an SA Addendum Report that takes account of the additional evidence that has been undertaken in response to the Inspectors' concerns. All sites throughout the development sequence are assessed in a consistent way.

¹⁴⁵ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060)

¹⁴⁶ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) table 5-1 Page 44, and figure 5-4 page 46

¹⁴⁷ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) table B.3 Page 87

¹⁴⁸ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) figure 5-11 Page 54

¹⁴⁹ Cambridge and South Cambridgeshire Local Plans Transport Report November 2015 (RD/MC/070) para 5.68 page 56

253. An updated Sustainability Appraisal Assessment Proforma of the site is included in the Cambridge and South Cambridgeshire Local Plans SA Addendum Report (November 2015/March 2016) which took¹⁵⁰. The assessment finds that development of the site would have a very significant negative impact on Green Belt purposes.
254. The SA Addendum Report assessed the potential of this site (CCSC1006) to accommodate: residential led mixed-use development for between 400 and 500 homes on land to the north west and north east of Fen Ditton. Maintain Green Belt buffer between proposed development and the A14. Opportunities for Green Infrastructure. Promoter refers to potential location for a secondary school.
255. Some of the key issues identified in the SA Addendum Report for this site are set out below:
 - **Air Quality:** Adjoins the A14. This proposal is located close to the Councils' Air Quality Management Area and is of a significant size.
 - **Noise:** The site lies close to the A14 and while residential development could be acceptable, a high level of transport noise mitigation would be required: combination of appropriate distance separation, careful orientation / positioning / design / internal layout of buildings, noise insulation scheme and extensive noise attenuation measures to mitigate traffic noise (single aspect, limited height, sealed non-openable windows on façade facing A14 / , acoustically treated alternative ventilation, no open amenity spaces such as balconies / gardens).
 - **Green Belt:** Very high and high impacts on Greenbelt purposes (very significant negative impact)
 - **Heritage:** There are several Grade II Listed buildings along High Ditch Road to the south, including numbers 6, 14, 15, 16, 17, 22, 23 and 25; the closest is approximately 30m to the south. The south western part of the site adjoins the Fen Ditton Conservation Area. The Fen Ditton Conservation Area Appraisal (2006) describes Fen Ditton as an essentially linear village which has resulted in a very narrow, serpentine form with an almost complete absence of backland development, the only exceptions being a few modern houses. The village has an unmistakably rural feel with its grass verges, large trees and its bucolic riverside setting. The high proportion of good quality buildings and spaces means that the streetscene and townscape is of exceptional quality even though the scale is modest.
The agricultural character of the village is very important especially at the eastern end of the village, along High Ditch Road, where (converted) barns line the road and there are views of the fine groups of farm buildings. The linear nature of much of the village also means that views out into the open fields surrounding Fen Ditton can be seen from many parts of the village.
Development would have a significant adverse impact on townscape and the landscape setting of the village. The LP2004 Inspector considered that the main built-up area of the village has been left behind once north of High Ditch Road. Development of this very large agricultural site will be very visible from the wider landscape and would be completely out of scale with the existing

¹⁵⁰ Sustainability Appraisal Addendum Report (December 2015) (RD/MC/020). Annex 1 Part 2 Site CCSC1006 on pages 446-456.

village. The site forms an important part of the setting of the Conservation Area, and several Grade II* and II Listed Buildings. It would not be possible to mitigate impacts on the historic environment because backland development would result in the loss of the green rural backdrop and is out of character with the linear settlement pattern. There is evidence for extensive prehistoric and Roman activity in the area, including a Roman settlement known from cropmarks to the north. The site is also located to the north of the route of the Flead Dyke, an earthwork boundary of Saxon date.

- **Integration with existing communities:** Development on this scale could not be successfully integrated into Fen Ditton.
- **Transport:** The site scores well against the sustainable transport score for South Cambridgeshire, which measures access to and quality of public transport and cycling.

A number of corrections were made to the assessment proforma for the site in response to representations from the Quy Estate (rep 65948) which can be found in the SA Addendum Report at Appendix 10 of the main report PDF page 253¹⁵¹. These amend the wording of the air quality score, and of the land contamination score.

256. The overall conclusion of the SA assessment in regard to the sustainability of different development locations are summarised in paragraph 5.4.3 as follows:

"The assessment concludes that the most sustainable level of the development sequence is within Cambridge. Development will have many sustainability benefits including protecting the distinctive setting of Cambridge through safeguarding the Green Belt and the associated biodiversity of the Green Belt". "With regard to the edge of Cambridge, the assessment has confirmed that there are sustainability benefits to development on the edge of Cambridge. With regard to transport, development on the edge of Cambridge remains the best performing option with regard to modal share and performs positively due to short distances to the city, low public transport journey times, and in many cases proximity to high frequency public transport. However, the modal share results hide the fact that these locations are in already congested areas of the city where there is little scope to create more capacity for more cars, forcing new trips to be undertaken by active modes. The Local Plans CSRM report shows that different development options do not result in radically different levels of traffic growth, travel times or delay. Whilst there are variations, these are in the context of very high overall traffic growth where significant amounts of development are already committed. Viability evidence has confirmed that sites on the edge of Cambridge do offer higher sales values than options further from the city meaning facilities and infrastructure are more viable. This offers benefits in terms of potential to secure higher funding through Community Infrastructure Levy (CIL) / Section 106. Cambridge is proposing to secure a higher rate of CIL than South Cambridgeshire, and this higher rate has the potential to be applied to edge of Cambridge sites. However, the Cambridge Inner Green Belt Boundary Study (2015) has concluded that it is unlikely that any development within identified sectors (apart from a few small exceptions) could be accommodated without

¹⁵¹ Sustainability Appraisal Addendum Report (updated March 2016) (RD/MC/021) Appendix 10 page 279

substantial harm to the Green Belt purposes. Therefore, the conclusions remain that, notwithstanding some of the positive sustainability effects that development on the edge of Cambridge demonstrates, it would not be possible to deliver significant additional development here without significant detriment to the specific purposes of the Cambridge Green Belt”.

257. The paragraph also looks at new settlements and village sites.
258. At paragraph 9.4 the report sets out the reason for selection of the preferred strategy to the location of development set out in the Local Plans as follows:

“The Councils acknowledge the advantages of edge of Cambridge sites in terms of accessibility to jobs and services in the urban area. The Councils have also taken account of the constraint imposed by the purposes of the Cambridge Green Belt and the level of harm that large developments within the currently designated Green Belt would have. However, this factor itself has been balanced against the need to promote sustainable patterns of development and the consequences of channelling development to locations outside the Green Belt. Consideration of sustainability must take account of the full range of economic, social and environmental issues. NPPF paragraph 152 requires Local Planning Authorities to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

In the context of all evidence now available, the Councils have considered the merits of edge of Cambridge sites and the locational advantages they offer, against the significant harm that would be caused by substantial development on the edge of Cambridge to the purposes of the Cambridge Green Belt. Additional new settlements offer sufficient benefits in terms of critical mass, services and facilities and opportunities to deliver high quality transport improvements. The Councils consider that the need for jobs and homes could in principle provide a justification for review of the green belt boundary. However whether in fact such a release is appropriate involves balancing other consideration including impact of release on the purpose of the Cambridge green belt, the accessibility advantages of locating development on the edge of the urban area and reasonable alternatives. The result of this balancing exercise has led the Councils to conclude that only small scale green belt released at locations where harm to the purposes of the green belt designation would be appropriate”.

Cambridge and South Cambridgeshire Development Strategy Update¹⁵²

259. This document describes the key evidence documents related to the alternative development strategies, and provides a summary of key issues in relation to each stage of the development sequence. It summarises the role of sustainability appraisal in the plan making process, and key findings in relation to the development sequence.

¹⁵² Cambridge and South Cambridgeshire Development Strategy Update RD/MC/060

260. Drawing on the evidence base, it then considers in Section 3 the consequences and issues related to the strategic choices available to the Council, including the consideration of sustainable patterns of development (as required by NPPF paragraphs 84 and 85) in the context of an area with a tightly drawn Green Belt around the historic city of Cambridge. It identifies the reasons for the preferred approach of the Councils in the submitted plans and having considered the issue afresh, taking account of the additional work undertaken. It concludes that the Councils have carried out or commissioned new studies to review the evidence on objectively assessed housing needs, Green Belt, transport, infrastructure and viability to ensure that the decision on the preferred strategy is based on a full understanding of the implications of the different strategy options. An addendum to the Sustainability Appraisal has also been carried out to ensure that the sustainability issues of the options available to the Councils are understood, in particular of land on the edge of Cambridge and at new settlements.
261. The Councils have been clear that they recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation, although it makes clear that major new development on the edge of Cambridge on congested radial routes have their own transport issues and are not necessarily cheap to deliver¹⁵³. The independent Green Belt evidence supports the findings of the Councils' own evidence that the release of land on the edge of Cambridge can be expected to compromise substantially the purposes of the Cambridge Green Belt, with two exceptions. One to reduce the size of an allocation in the submitted South Cambridgeshire Local Plan and one to allocate a new employment allocation as an extension to the Cambridge Biomedical Campus.
262. The evidence also looks at the potential to deliver sustainable new settlements, as an alternative to sites on the edge of Cambridge. It concludes that they can provide viable and deliverable developments, that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, that will attract significant levels of patronage and also provide wider benefits to existing communities. The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.
263. Having weighed all those factors, the Councils maintain their view that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period. The strategy will provide a range of deliverable sites for the plan period and beyond, and the Councils consider that sustainability will be secured.

Assessment and Conclusion

264. It is not necessary to allocate this site to make the plan sound. It has been demonstrated through the plan making process that there are better alternatives available to meet development needs.

¹⁵³ See for example paragraph 22 of the Council's Matter 7 Transport statement M7/ CCC & SCDC

265. The SHLAA (including the combined Green Belt Site and Sustainability Appraisal Assessment Proforma and SA provide a robust assessment of the site and comparison with alternatives subject to the considerations set out in this statement..
266. A number of criticisms of the November 2015 Inner Green Belt Boundary study were made by the promoter of this site in response to the proposed Modifications consultation (Reps 65917, 65916, and 65915). Whilst methodological concerns were primarily addressed at the PM2 Green Belt Review Methodology hearing in June 2016 a number of closely related site specific concerns were also made to the effect that the assessment of sectors 18 and 19 in the study are not appropriate.
267. The LDA Study states, in the case of sectors 18 and 19, that "it is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes" where the assessment process has not identified any locations within the sector that could accommodate development. Clarification is then provided for each sub area as to why development would not be acceptable. In locations where parts of a sector or sub area have been identified that could accommodate development, such as in sectors 8, 10, 11, 12 and 13, parameters are provided that would avoid significant harm.
268. The links between the 16 qualities used as criteria for the assessment and the National and Cambridge Green Belt purposes are described fully in section 5.2 of the LDA Study, along with the summary table on pages 59-60. For each sector, and where applicable sub area, under the heading 'Importance of the Sector to Green Belt Purposes' the Study identifies the qualities which are most relevant to the sector and sub areas, on which the assessment of importance is primarily based. These can then be related back to the National and Cambridge Green Belt purposes. The importance of a particular area of land to Green Belt is not determined by the number of Green Belt purposes it performs.
269. Development of the site would have a very significant negative impact on Green Belt purposes, and a significant negative impact on landscape and townscape, heritage and its lack of integration with existing communities¹⁵⁴. The locational advantages of large scale development on the edge of Cambridge are not considered to outweigh the negative impacts on the purposes of the Cambridge Green Belt taking account of reasonable alternatives.
270. The representor states that the site could accommodate a secondary school for the eastern side of Cambridge. A site for a secondary school to serve the eastern quadrant of Cambridge is a requirement of policies in both Local plans for the development of land north of Cherry Hinton. Preparation of an SPD to guide the future development of this land has commenced¹⁵⁵.
271. The site is not required to meet objectively assessed need for homes in the plan period. The site does not need to be allocated to make the plan sound.

¹⁵⁴ RD/MC/120 Annex 1 Part 2 site assessment CCSC1006

¹⁵⁵ RD/MC/010 proposed modifications PM/CC/3/A policy 12 and PM/SC/3/A policy SS/3

Appendix 1: List of Reference Documents

The Council's evidence in relation to M11 Joint omission site is set out in the following documents:

General:

- Letter from the Inspectors to the Councils dated 20 May 2015 regarding Preliminary Conclusions (RD/GEN/170)
- Councils' letter to the Inspector (June 2015) setting out a programme of work to address these concerns including an update to the development strategy, preparation of a Green Belt review, preparation of a Transport report, and preparation of an addendum to the SA (RD/Gen/180)
- The Inspector's formally suspended (in July 2015) the examinations until March 2016 (RD/Gen/200)

National Policy:

- National Planning Policy Framework (RD/NP/010)

Earlier stages of plan making

- South Cambridgeshire District Council Issues and Options Report (June/July 2012) (RD/LP/030)
- Issues and Options 2 Part 1 Joint Consultation on Development Strategy and Site Options on the edge of Cambridge (January 2013) (RD/LP/150)
- Issues and Options 2 Part 1 Joint Consultation on Development Strategy & Site Options on the edge of Cambridge, Technical Background Document Part 1 (January 2013) (RD/LP/170)
- Cambridge Local Plan. Towards 2031 - Issues and Options report (2012) (RD/LP/240)

South Cambridgeshire District Council submission documents

- Cambridge and South Cambridgeshire Local Plans Sustainability Appraisal Addendum Report (November 2015) (RD/MC/020)
- Cambridge and South Cambridgeshire Local Plans Sustainability Appraisal Addendum Report November 2015 supplement (November 2016) (RD/MC/021)
- Draft Final Sustainability Assessment Annex A Local Plan Chapter 9 (March 2014) (RD/Sub/SC/060)
- Draft Final Sustainability Appraisal Report and HRA Screening Report, Annex A: Audit Trail Appendix 8 (March 2014) (RD/Sub/SC/060)
- Draft Final Sustainability Assessment Annex B, Site Assessments for edge of Cambridge Sites, Broad Location 4 (March 2014) (RD/Sub/SC/060)
- Cambridge City Council Statement of Consultation and Audit Trails (2013) (RD/Sub/C/080)

Modifications consultation

- Proposed Modifications Joint consultation Report for the Cambridge Local Plan and the South Cambridgeshire Local Plan (December 2015) (RD/MC/010)
- Proposed Modifications Report on Consultation for the Cambridge Local Plan and the South Cambridgeshire Local Plan (March 2016) (RD/MC/120)

The Cambridge Inner Green Belt Boundary Study

- Cambridge Inner Green Belt Boundary Study by LDA Design (November 2015) (RD/MC/030)
- Cambridge Inner Green Belt Boundary Study November 2015 by LDA Design Supplement (March 2016) (RD/MC/031)The Cambridge Green Belt Boundary Study by Landscape Design Associates (now LDA Design) (2002) (RD/Strat/180)The Cambridge Inner Green Belt Boundary Study (2012) (RD/Strat/210)

Cambridge and South Cambridgeshire Local Plans Transport Report

- Cambridge and South Cambridgeshire Local Plans Transport Report (November 2015) (RD/MC/070)

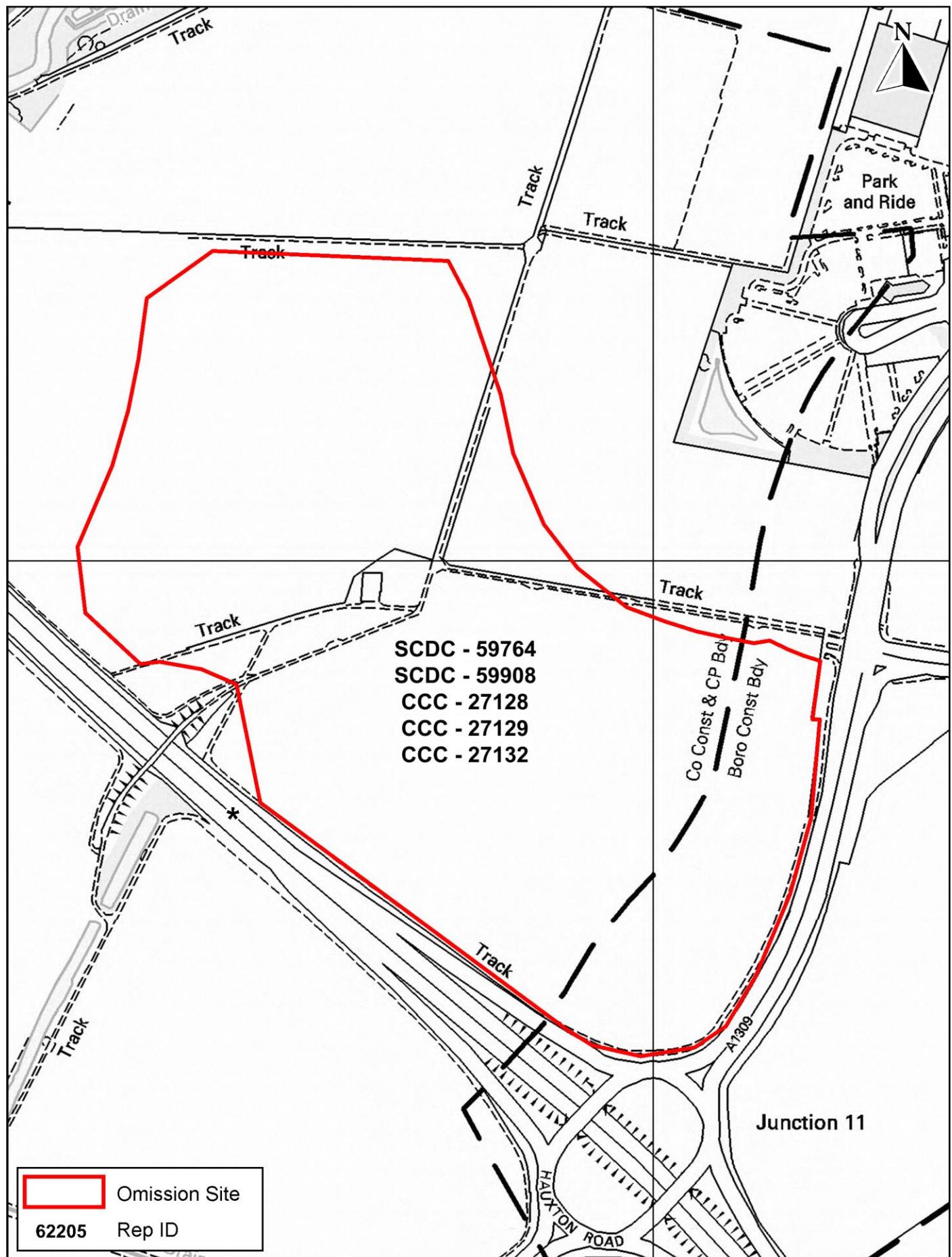
Cambridge and South Cambridgeshire Development Strategy Update

- Cambridge and South Cambridgeshire Development Strategy Update (November 2015) (RD/MC/060)

Appendix 2: Maps showing joint omission sites

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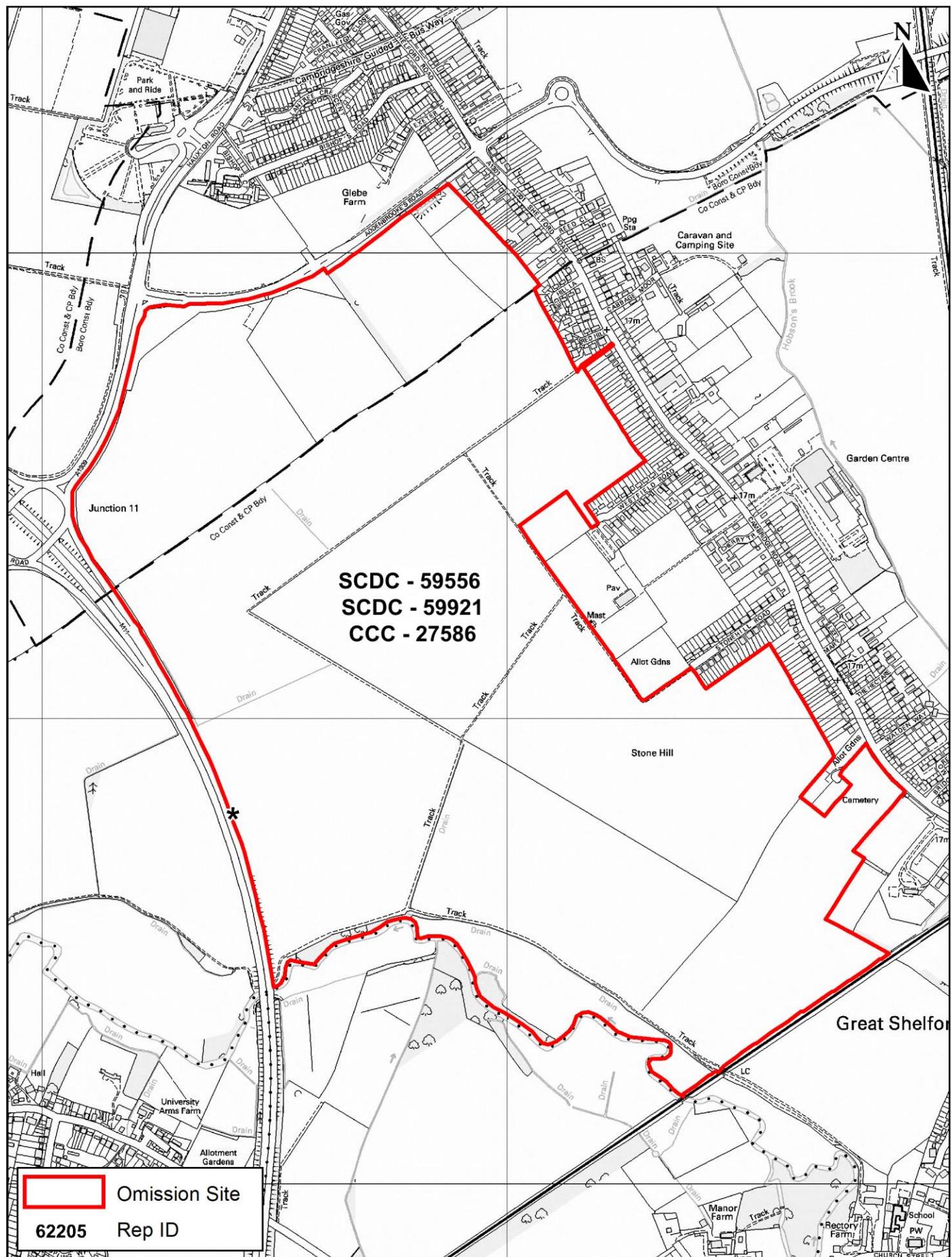


Date:	10/05/2017
Produced by:	Sam Johnston
Service:	Planning Policy
Scale:	1:5,000 @ A4

Omission Sites: M11.1 - Land West of Hauxton Road, Trumpington

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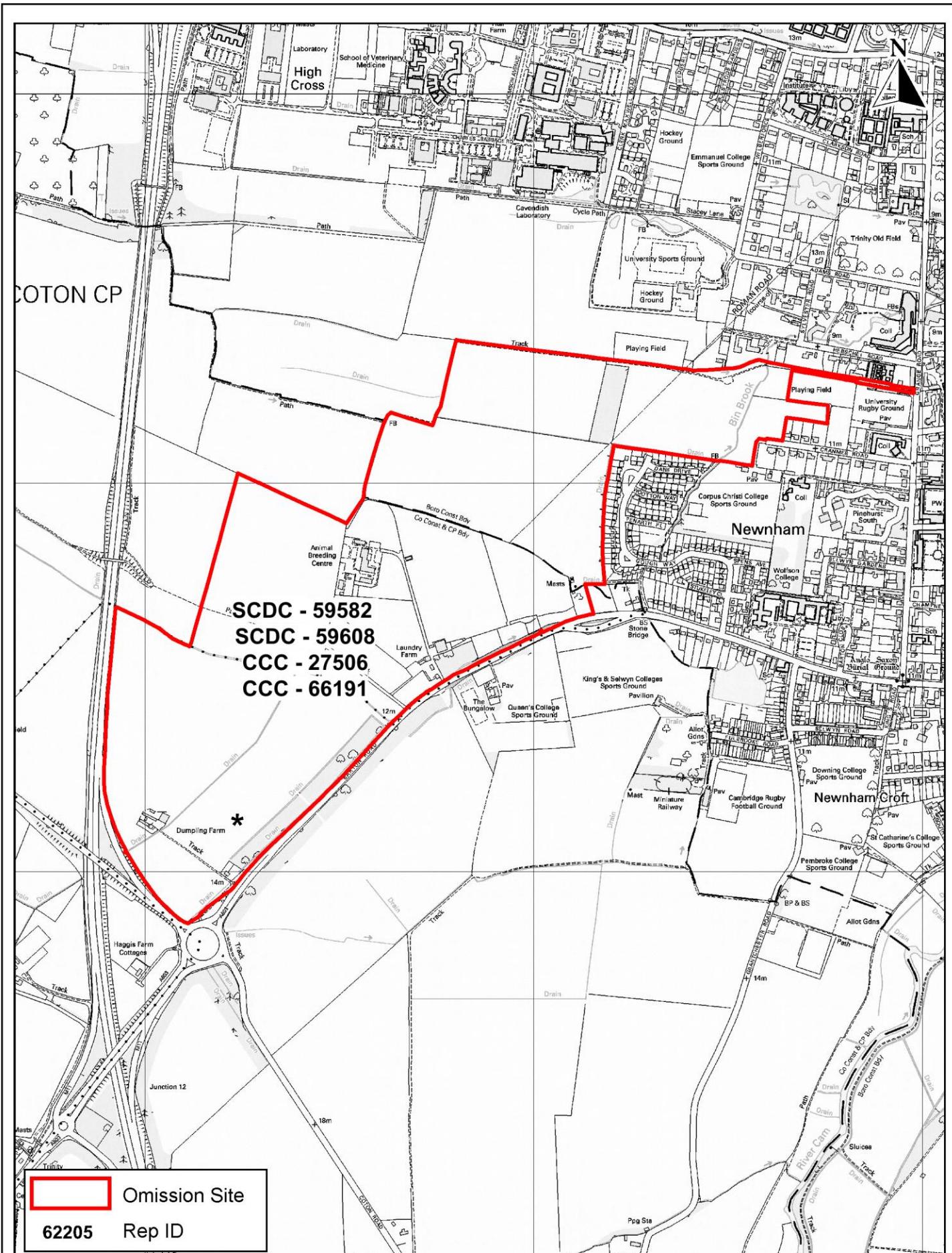


Date:	10/05/2017
Produced by:	Sam Johnston
Service:	Planning Policy
Scale:	1:11,000 @ A4

Omission Sites: M11.2 - Cambridge South

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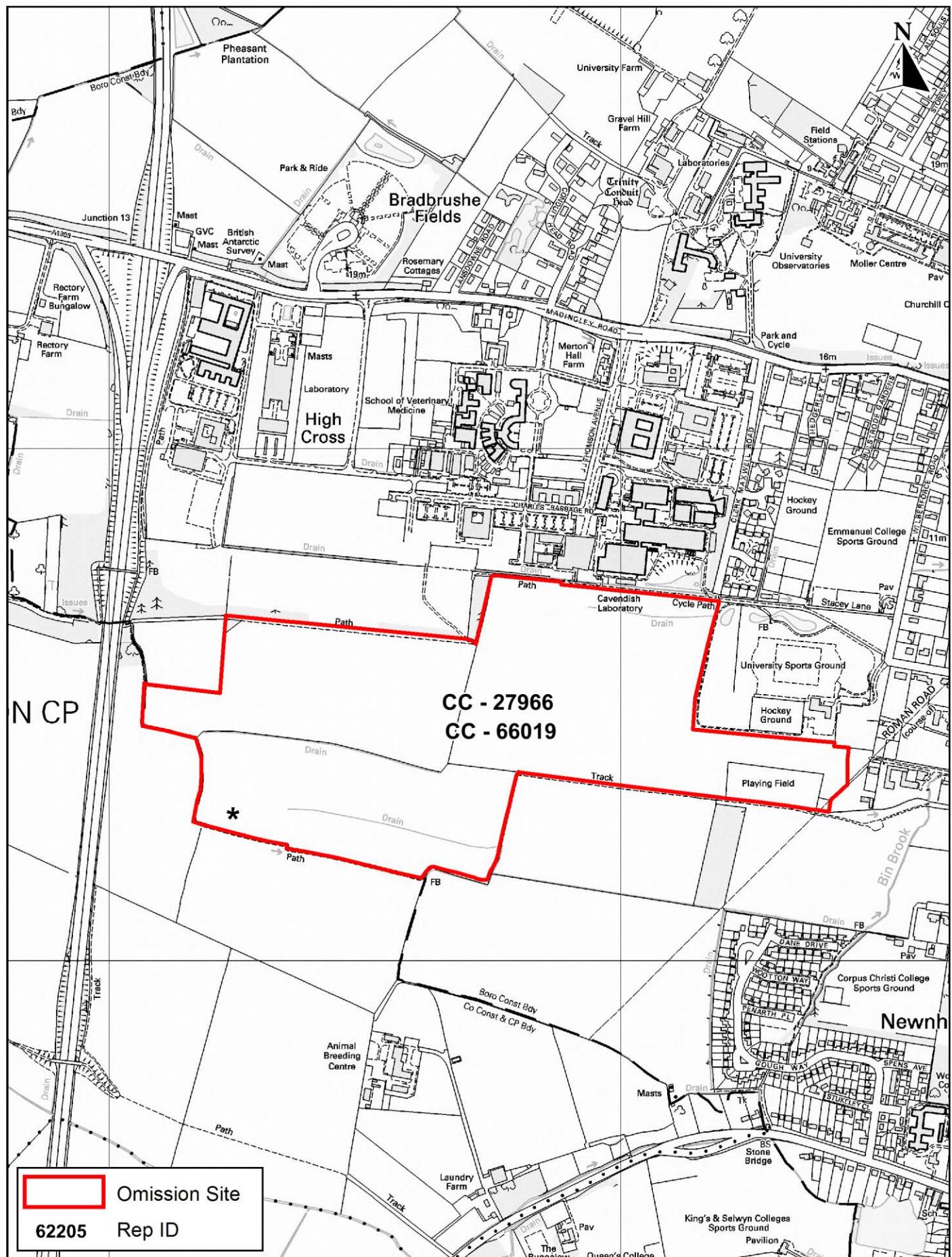


Date:	10/05/2017
Produced by:	Sam Johnston
Service:	Planning Policy
Scale:	1:13,000 @ A4

Omission Sites: M11.3 (part) - North of Barton Road

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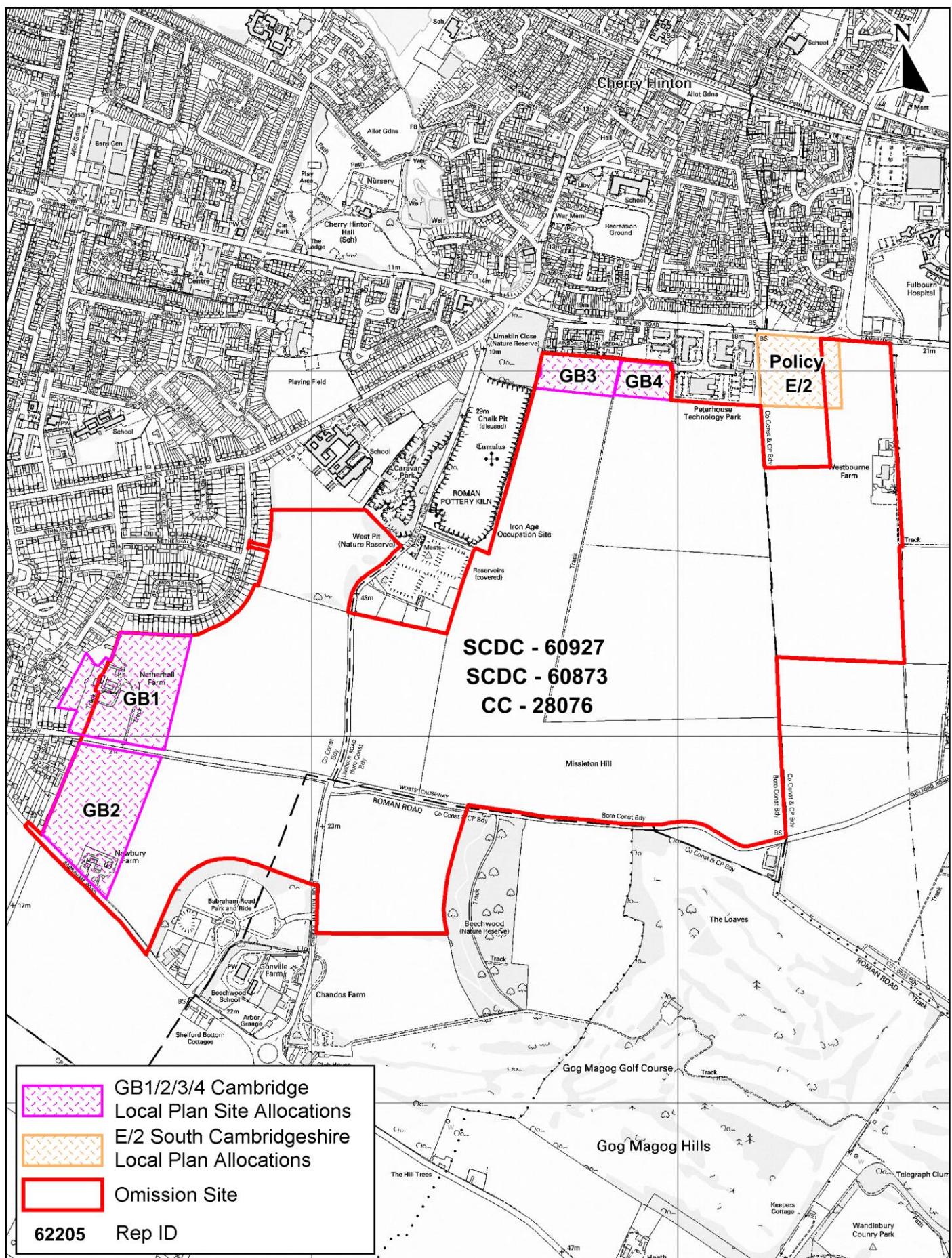


Date:	10/05/2017
Produced by:	Sam Johnston
Service:	Planning Policy
Scale:	1:10,000 @ A4

Omission Sites: M11.3 (part) - Grange Farm

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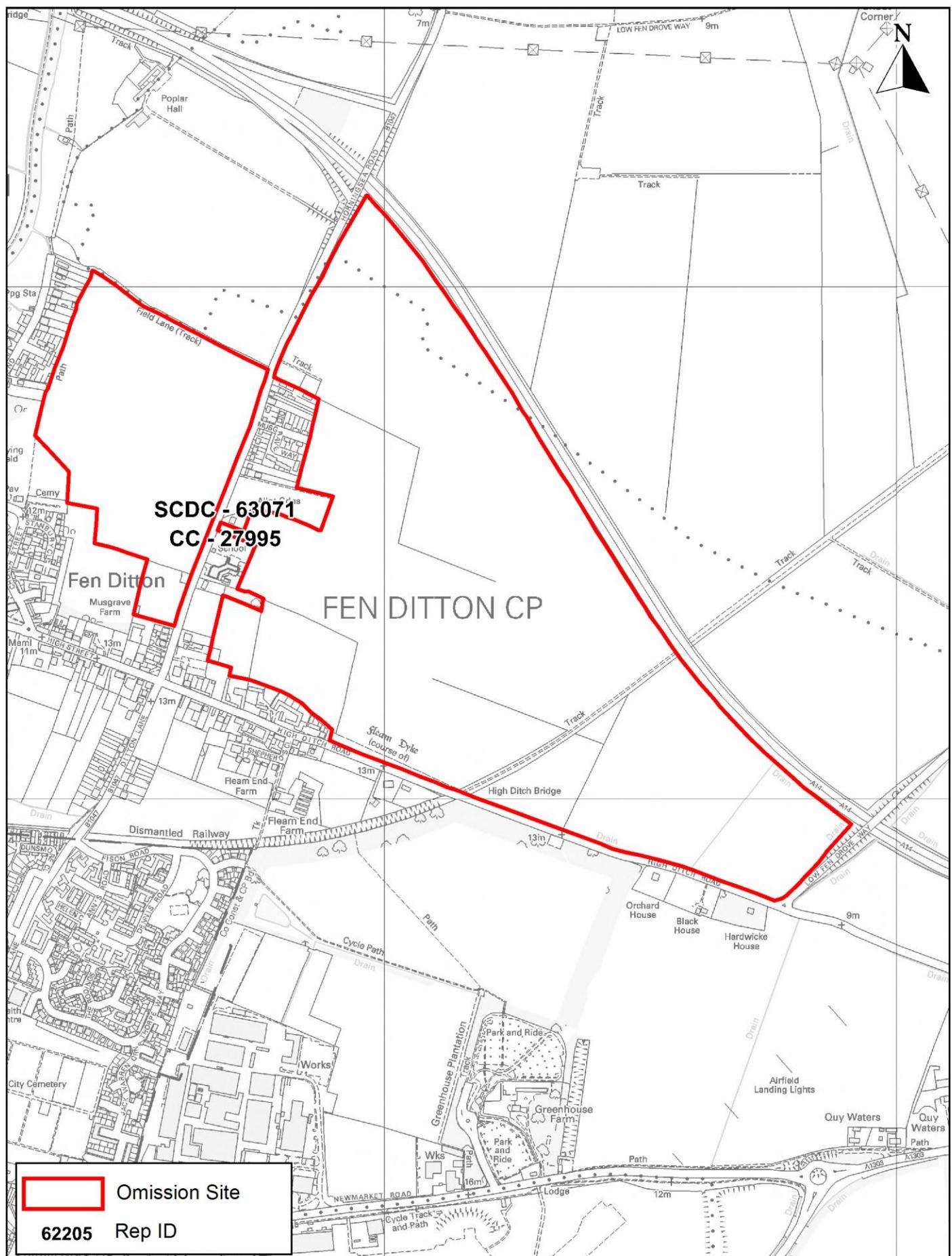


Date:	25/05/2017
Produced by:	Sam Johnston
Service:	Planning Policy
Scale:	1:14,000 @ A4

Omission Sites: M11.4 - Cambridge South East

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Date:	10/05/2017
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Omission Sites: M11.5 - Land at Fen Ditton

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**Appendix 3: Letter from Councils to Grosvenor Estates Regarding Sporting Village
Planning Application 23 November 2016**

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**South
Cambridgeshire
District Council**

Julia Chowings
Deloitte Real Estate
Athene Place
66 Shoe Lane
London
EC4A 3BQ

By email

23 November 2016

Dear Ms Chowings

Re. Cambridge Sporting Village (CSV) and Cambridge Community Stadium (CCS) Applications – S/1925/16/OL, 16/1376/OUT and 16/1375/OUT

I refer to your planning applications received on 22 July 2016 and supporting documentation. Officers have now had the opportunity to review the submitted application documentation in detail and to take stock of the key consultee responses. I note that you have also recently submitted the detailed financial appraisal document which we will need to share with our appointed external consultant as soon as possible. The purpose of this letter is to update you on officers' views, as currently formulated, on the applications in this context and I have summarised the key issues of principle that relate to both sites.

Firstly, I would like to draw your attention to several fundamental issues identified in the applications that impact on the decision making process including your submissions concerning 'very special circumstances' in the Green Belt. I have already reminded you in previous correspondence about the status of these proposals as a Departure from the Local Plan and these considerations remain applicable.

Policy Context and Prematurity

As part of the draft Local Plan, a process was developed between the Councils to jointly assess appropriate sites for a community stadium within the sub-region. On the evidence available and the results of public consultation, the two Councils are not satisfied that a compelling case exists amounting to the exceptional circumstances necessary in national planning policy for allocating land for a community stadium or other significant sporting facilities in the Green Belt. The Councils have worked together with Sport England to produce a Playing Pitch Strategy and an Indoor Sports Facilities Strategy for Cambridge and South Cambridgeshire to 2031, which has not identified any quantitative or qualitative need for a community stadium or a sub-regional sports facility.

Officers remain strongly of the view that the Local Plan examination is the correct process for considering the CSV proposal, as advised in our letter of the 11 November 2014 and our more recent meeting on 14 July 2016. As you are aware, planning law requires that applications for planning permission must be determined

in accordance with the development plan, unless material considerations indicate otherwise. The Councils in their emerging Local Plans have set out clear strategy for delivering housing and meeting sporting needs. The plans have carefully considered both the merits and impacts of development on the edge of Cambridge. These issues go to the heart of the Local Plan. The substantial scale of the proposed development would be so significant that it would undermine this plan making process. The applications therefore give rise to a clear and compelling prematurity objection.

In terms of the CSV application, the site is located wholly within the Green Belt wherein there is a presumption against development for purposes other than those categories specified in paragraphs 89 and 90 of the National Planning Policy Framework (NPPF) 2012. The proposal falls outside of these specified categories and is therefore inappropriate development, as indeed you acknowledge. Moreover, the proposal would cause irreversible harm to the openness of the Green Belt and conflict with the purposes of Green Belt land set out in paragraph 80 of the NPPF (2012), the South Cambridgeshire Core Strategy 2007 (Policy ST/1), the Cambridge Local Plan 2006 (policy 4/1), and the Submitted Local Plans (South Cambridgeshire Policy S/4 and paragraph 2.29, Cambridge Policy 4 and table 2.4). Accordingly, the proposed sporting village development falls to be considered under paragraph 87 of the National Planning Policy Framework (NPPF, 2012), which states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances, in accordance with the approach set out in paragraph 88 of the NPPF.

The NPPF states further at paragraph 88 that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. The CSV development would substantially reduce the openness of the Green Belt and harm the open, rural agricultural character of the application site. It would remove the foreground setting to the newly designed city edge gateway, extend the city further from the historic core, remove the distinctive separation between the new defined edge and the M11, and remove the supportive landscape characteristic at the edge of the city.

Whilst I consider your Green Belt Appraisal has underestimated the likely extent of harm, the Appraisal has also relied on a flawed methodology by reason of the criteria that the various parcels are assessed by in order to determine their contribution to Green Belt purposes. These criteria are generally relatively simplistic and do not fully recognise the complex nature of Green Belt around Cambridge, which is highlighted in the Cambridge Inner Green Belt Boundary Study (2015) and its supplement. The appraisal also utilises a scoring system to assess the importance of each assessment parcel to Green Belt purposes, which is not appropriate, as it is not necessary for land within Green Belt to perform all five of the Green Belt purposes in the NPPF paragraph 80. In turn, it follows that the importance of a particular area of land to Green Belt is not determined by the number of Green Belt purposes it performs.

Consequently, the proposal would have to demonstrate an extremely high level of public benefit to overcome the Green Belt harm and strongly justify why the development is required in this specific location.

Very Special Circumstances Relied Upon

There are six main points put forward in the CSV application towards the applicant's very special circumstances case and these are considered in turn overleaf.

1 & 2 - Creating a sustainable financial footing for Cambridge United and Agreement of a new lease for the Football Club

The main argument presented in the applications is that the enabling development proposed in the Cambridge Green Belt is necessary and justified to put Cambridge United Football Club (CUFC) on a sound financial footing and enable the Club to be more competitive and extend its community outreach programmes, by extending the lease and delivering improvements to the Abbey Stadium site as well as the new training facilities in Trumpington. Whilst recognising the contribution of the community outreach programme to the local area, these points also represent a direct financial benefit to a private company, CUFC and are not in my view sufficient to amount to very special circumstances for the purposes of Green Belt policy.

It is not clear in the CSV and CCS applications what alternative development or business options have been considered and discarded to reach the proposed developments being put forward. Your submissions do not address this point and there is also a lack of clarity in relation to how the cross-funding from the CSV project benefits CUFC financially. This is something that members and officers would need to see in order to fully understand your enabling development case. Without the above information I cannot conclude that the enabling development as proposed is the only option and is therefore necessary and justified in the Green Belt.

In terms of the public benefits of the scheme, it is not clear why the changes to the Abbey Stadium lease arrangements are in two stages (a variation to the existing lease and a new lease) and why the new lease cannot be brought forward, given that the proposed phasing currently shows this would not happen until completion of all Phase 1 works at the Abbey Stadium site (which would be in 2022 at the earliest).

Moreover, the recently submitted financial information has not yet been considered by the Council's consultants. That information may give rise to further matters concerning the enabling element of the proposal development.

3. Improving the Abbey Stadium

The Community Stadium proposals include the redevelopment of the North Stand to increase its capacity and improve the facilities available to supporters, including disabled fans. I would accept that there is some public benefit resulting from these proposed improvements to the Abbey Stadium, but this benefit alone does not outweigh or justify the substantial harm to the Green Belt in this instance.

4 & 5 Delivery of new sporting facilities to meet identified need in Cambridge and South Cambridgeshire and Provision of training facilities and improving its Academy status

Prior to the submission of your planning applications the Councils had published two sports strategies: a Playing Pitch Strategy 2015-2031 (PPS) for grass and all weather pitches covering both areas; and an Indoor Sports Facility Strategy 2015-2031 (ISFS) to guide future provision of indoor sports halls, swimming pools and outdoor cycling facilities to serve existing and new communities in Cambridge and South Cambridgeshire. In line with the NPPF, the strategies assess existing facilities, the future need for sport and active recreation facilities, and opportunities for new provision.

Both strategy documents set out clear and deliverable strategies for providing the necessary sports investment over the Plan period and have been developed in accordance with Sport England's methodology which has involved significant consultation with pitch/facility providers and national governing bodies, including the Football Association. Significant progress has already been made in the implementation of these two key strategies since their adoption and both Councils have proposed a number of modifications in their statements to the Local Plan Examinations to reflect the findings of the PPS and ISFS.

Your submitted Sporting Needs Assessment was developed prior to the research and consultation undertaken for the PPS. Whilst it follows the PPS methodology, it was produced in the absence of knowledge of the overall context for Cambridge and South Cambridgeshire, in terms of current and planned playing pitch provision (grass and all weather), usage patterns, accessibility, and needs, current and future, informed by the collective input of all relevant National Governing Bodies.

The creation of a Category 2 Football Development Centre would be a benefit but it is reflective of the desire and ambitions of a single sports club and its public benefit would be limited mainly to elite or talent based sports participants. It follows that the Cambridge Sports Village facility mix is not truly a community facility – it reflects commercial need in this instance and focusses predominantly on the requirements of a Category 2 Football Development Centre rather than the priority needs for community sports facilities in the Greater Cambridge area, as set out in the ISFS and PPS. Our review of your Sports Needs Assessment also shows that the priority needs for community sports facilities in the Greater Cambridge area can be met without a sporting village and are strategically best placed to serve the wider community in more dispersed locations. On this basis, I do not consider a robust case has been made for the need for a sporting village in this Green Belt location, nor elsewhere in the district for that matter.

Particular focus has been placed in your application on the public benefits of additional 'Quality Adjusted Life Years' (QALYs). QALYs are only one outcome of the proposal and could be replicated on proposed sporting developments elsewhere. As such, I do not consider this outcome alone to amount to very special circumstances.

What is critical in the CSV development is the justification for the proposal in this location and to what extent it generates public benefit. As mentioned above, the sporting need justification at this site is considered to be lacking and the purported public benefits of increased sporting activity appear to be limited. This is due to the co-location of sporting facilities at the CSV site and the requirement for many residents, particularly in rural areas of South Cambridgeshire, to travel from afar to use the proposed facility. Additionally, your Community Benefits Statement also indicates very limited casual user access and utilisation of the sporting facilities. This is due to the priority use of sporting facilities by CUFC and its ambitions of becoming a Category 2 Football Development Centre, in addition to priority use by sporting clubs and talent-based programmes. Access of the sporting pitches and cycling/BMX track would also be exclusively to those who can pay to use them given these facilities would appear to be fenced off from casual public use.

6. Expansion of the Community Trust's activities

The Community Trust currently operates a number of programmes which are accessible to a wide range of the community. It currently operates from a number of locations, including the Abbey Stadium as pointed out in your Planning Statement. The expansion of the Community Trust's programme is laudable in its objectives; however, having read your submitted documents, officers' view is that you have not made a strong case to justify locating this expanded outreach programme at the CSV site. This is bearing in mind the logic that these existing outreach programmes already benefit the public by being accessible to a number of communities in different locations in the city and the wider area. If anything, the proposed development runs the risk of directing funding and provision of these programmes away from existing community locations and displacing sporting participation away from other sports facilities. The Councils' PPS and ISFS (2016) have shown that priority needs for community sports facilities in the Greater Cambridge area can be met without a sporting village and are strategically best placed to serve the wider community in

more dispersed locations. This point does not appear to have been adequately assessed within the socio-economic section of your Environmental Statement.

On the basis of the above, I do not consider a case has been made for very special circumstances that clearly outweigh the aforementioned harm to the Green Belt, as well as the ‘other harm’ in the issues listed below. The proposed CSV application therefore fails to meet local and national Green Belt policy objectives.

Other Matters

Given that the applications fail on the basis of the fundamental principles as outlined above, I do not propose to set out in full in this letter the other planning issues arising from the proposals. However, there are a number of other important matters in relation to the sporting village proposals in terms of transport, education, archaeology, ecological impacts, floods and water, and environmental quality that remain unresolved, as well as some Abbey Stadium site-specific matters, that I briefly touch upon below:

Transport – There are significant concerns with the impact of the CSV proposal on an already heavily congested road network and the absence of highway mitigation measures to alleviate this. Cambridge County Council has raised concern that there is already significant queuing experienced on the hard shoulder of the M11 in the AM peak, which is a safety and operational concern. Furthermore, no mitigation is planned to address the deficiencies identified in existing footways/cycleways or the limited bus services in the evenings and on Sundays. This is an unsustainable position as the proposal runs contrary to the public interest of delivering planned, sustainable development, which is satisfactorily mitigated in terms of its highway impacts.

Education – The information provided in the Environmental Statement suggests additional demand of 94-130 secondary aged pupils from the CSV development. Cambridgeshire County Council does not consider that surrounding schools have capacity to meet this additional demand either in their present configuration or with realistic modifications, and notes that the application does not offer any appropriate mitigation. This would give rise to children having to travel much further distances to reach schools with available capacity. There is also no reference to potential for securing early years provision as part of the application. The Councils consider that this is unsound in the context of delivering a sustainable community. Consequently, the CSV application fails to meet the objectives of sustainable development, as it does not present any measures to mitigate the lack of secondary school capacity and early years provision.

Archaeology – The site is located within a landscape of high archaeological potential. The Environmental Statement chapter suggests evaluation trenching of the site as a mitigation measure. However, the purpose of the evaluation is to define the character, extent and significance of archaeological assets within the application area and provide information to determine an appropriate mitigation strategy. The evaluation should be undertaken to inform the planning application and not deferred to a later stage. Without the results of field testing through trial trench evaluation, it is not possible to adequately characterise the extent and significance of assets which would be affected by the development. Consequently the application fails to comply with Schedule 4, Part 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and paragraph 128 of the NPPF 2012.

Ecology – The NPPF (para. 9) is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution. From the submitted

information, the proposed development would result in a net loss of biodiversity and there is very limited information to show how the proposal would meet the aims of sustainable development mentioned above.

Floods and Water –The allowable discharge rate should be based on the drained area only (16.2 ha) and not the whole development area (21.56 ha). Based on the 2 l/s/ha as agreed with the Environment Agency and Lead Local Flood Authority this would equate to 32.4 l/s rather than 43.12 l/s as stated within the submitted Flood Risk Assessment (FRA). This will also have an impact on the required volumes of attenuation as outlined in Table 7 of the FRA. Whilst an attenuation basin constitutes part of a SuDS system it is only one element and therefore it is not considered that the site will adopt an overall SuDS strategy. Table 8 of the FRA suggests that all surface water from the residential plots will pass through swales; however paragraph 8.22 states that swales have been provided to ensure that in an extreme event that exceeds the design standard, water would naturally find its way towards the pond. This implies that the swales will only be utilised in events exceeding the 1 in 100 annual probability (1%) plus climate change event.

Officers also point out that paragraph 6.12 of the FRA states, '*the proposed surface water drainage strategy will also be designed to cater for the 1:100 year return period rainfall event including a 30% climate change allowance as this falls within between the Central and Upper End allowances*'. The remainder of the FRA however designs the surface water system using a **20%** allowance for climate change. This will have an impact on the volume available within the 300 mm freeboard of the pond.

Environmental Quality including noise – Existing ambient traffic noise levels at the CSV site are relatively high and would require the majority of the proposed 520 dwellings to require some form of noise mitigation at night-time and likely alternative mechanical ventilation for all the road-facing units. This represents a significant number of units requiring mitigation and we note also that estimated noise levels in the majority of external private gardens are at the upper limit of acceptability. This together with the higher noise levels experienced in the recreational areas and other general amenity areas closest to the M11 compromises the sustainability and overall environmental quality of the development, contrary to at least two of the core planning principles set out in the NPPF (para.17).

Abbey Stadium scheme – development specific issues

Issues that overlap with the Sporting Village scheme have already been highlighted above. The following comments are provided on the basis of considering the Abbey Stadium scheme as a stand-alone application.

The principle of a mixed use development is supported in this location, although there remain a number of material issues that are unresolved in the submission. Firstly, the two new blocks on the Newmarket Road frontage will create larger scale blocks when compared with the existing buildings to the east and north. The form of these two blocks does not relate well to the more modest scale of existing development and the submitted information has not demonstrated that the development would not have an adverse impact on the setting of the surrounding listed buildings.

There are also a range of issues relating to the parameter plans and a need for further work on the Transport Assessment and further clarity within the supporting information about some of the uses proposed and their likely impacts and operation e.g. the student housing (and whether this is to be linked to Anglia Ruskin or Cambridge University or another organisation or indeed whether it is a speculative application) and the hostel. This makes drawing a conclusion on the balance of merits in this case difficult.

Summary

From the Councils' assessment to date, the principle issues identified in the applications significantly undermine the case for very special circumstances and the ability of the scheme to meet the definition of sustainable development.

Consequently, in decision making terms, substantial weight must be attached to the level of harm arising from the CSV development upon the Green Belt when compared to the purported public benefits of the scheme and lack of sustainable development. As matters stand I do not consider that the applications can be supported by officers.

Prior to submission of the application, I had advised of my intention to determine the submitted applications promptly. In view of the conclusions above, I would invite you to consider, as an alternative to a recommendation for refusal, the withdrawal of the applications.

Yours sincerely

SK

Stephen Kelly

Joint Director of Planning and Economic Development
South Cambridgeshire District Council and Cambridge City Council