

Matter 6: Green Belt

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

Background Statement:

- i. CambridgePPF believes that the Cambridge Green Belt continues to play a key role in delivering the CCC's *Vision for Cambridge to 2031* of keeping Cambridge as '*a compact dynamic city, located within the high quality landscape setting of the Cambridge Green Belt*' (Para 2.3 of the CCC submitted Plan).
- ii. CambridgePPF believes that the Cambridge Green Belt has been effective in protecting the green setting of the historic city by preventing unsightly sprawl around the city fringes. The villages around Cambridge have also benefited both by preventing them from becoming subsumed into a growing urban area, and by restricting extensive development that would compromise their character. These purposes are even more relevant today.
- iii. CambridgePPF argues that priority in the development sequence should be given to within the urban area, especially brownfield sites, and that further releases of Green Belt should be the option of last resort when other sites both within the urban area and outside the Green Belt have been exhausted.
- iv. CambridgePPF argues that until the development of the Green Belt land released in the 2006 Local Plan has been completed, it will not be possible to assess the impact of this substantial increase in the urban area on the sustainability of Cambridge. Any further release would therefore be premature and risk the sustainable development of the city.
- v. Cambridge is a city with an international reputation for its character, culture and heritage. In determining the optimal patterns for sustainable development, the social and heritage factors that underpin the special character and ambience of Cambridge must be at the forefront. Short-term commercial gain should not be allowed to jeopardise the city's future.

i.a Does the level of need for new jobs and homes constitute the exceptional circumstances necessary to justify the proposed removal of sites from the Green Belt?

- i. **No** for the following reasons:
- ii. The DCLG has recently revised its Planning Practice Guidance to answer the two questions, '*do housing and economic needs override constraints on the use of land such as Green Belt?*', and '*in decision taking, can unmet need for housing outweigh Green Belt protection?*' The clarification provided confirms that '*the unmet need for housing and jobs do not alone outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.*' (Para 044: Ref 3-044-2014006: revised 06.10.14: and Para 034: Ref 3-034-20141006: revised 06.10.14). This clarification presents an endorsement of the importance the Government attaches to Green Belts, and provides an unambiguous steer that pressures for jobs and houses alone do not constitute 'exceptional circumstances'.
- iii. The CCC's justification for releasing more Green Belt land (Paragraph 2.26) is simply to satisfy its shortfall of some 400 dwellings in its housing provision. This contradicts the PPG clarification, and does not meet the requirement for 'exceptional circumstances'.

- iv. Alternative sites for residential use within the urban area have been presented to this Examination as part of our written statement of evidence for Matter 2 (Appendix 1). Potential sites for additional residential use beyond the Green Belt in South Cambridgeshire might include some of the villages along the route of the Guided Busway such as Swavesey, Over, and Fen Drayton, and the further expansion of Cambourne to the West into the triangle created by the A1198 and the A428 beyond the expansion proposed in the SCDC submitted Plan. So long as such sites have not been considered, the exceptional circumstances cannot be satisfied.

i.b What would be the consequences if the boundary of the GB was to be retained in its current location:

- i. In terms of housing provision, the consequences would be insignificant. For CCC, the 430 dwellings at GB1/GB2 account for 3.2% of the total housing provision of 14,000, and only 1.3% of the 33,000 new homes proposed for the Greater Cambridge area. Why go through the necessity of re-drawing the Green Belt boundary for so little reward?
- ii. For SCDC, the 455 new dwellings in the three Rural Centres of Sawston (340), Comberton (90) and Impington (25) contribute 2.4% of the total provision of 19,000 and just 1.4% of the total provision for the Greater Cambridge area. These amounts are trivial.
- iii. In terms of spatial planning, leaving the boundary unchanged would have positive consequences in terms of protecting the setting of the city from further urban sprawl, and negative consequences in terms of increasing the pressure to find alternative sites, especially brownfield sites, within the urban area (see item 1.a.iv above)
- iv. If for planning purposes it is deemed necessary that sites for the entire housing provision must be allocated, including the shortfall of 430 new dwellings, then a 'floating allocation' in the Green Belt is proposed for the CCC Plan with the actual allocation deferred for now. In the meanwhile, it is completely unacceptable for the residents of the Queen Edith's Ward to have this threat held over their heads. The sites should be deleted.

ii. Does the 2012 Inner Green Belt Study provide a robust justification for the proposed boundary change, and if not, why not?

- i. CambridgePPF has reservations about the robustness of the 2012 Study and therefore its appropriateness for proposed boundary changes. Our concerns relate to the methodology used and its transparency, and can be summarised as follows:
 - a) The lack of consistency in the assessment criteria between the 2012 Study, the CCC and SCDC submitted Plans, and the NPPF, and particularly the different purposes of the Green Belt
 - b) The lack of sensitivity in the study to the potential impact of different types and scale of 'development' – a group of bungalows will have a manifestly different impact to a five-storey block of flats
 - c) The reliance of the 2012 Study on the 2002 Green Belt Study (RD/Strat/170) which adopted different assessment criteria and is therefore of less relevance.
 - d) The approach is not consistent with current best practice – eg Guidelines for Landscape and Visual Impact, 3rd Edition, 2013, Landscape Institute

- iii. The principle flaw is the lack of consistency of the purposes of the Cambridge Green Belt and thus in the criteria against which importance was assessed. The four purposes adopted by the Study relate only very loosely to the NPPF purposes, and there is no explanation how these Cambridge purposes were drawn up.
- iv. Furthermore, the Cambridge purposes adopted for the 2012 Study differ significantly to the purposes then presented in Table 2.4 of the CCC submitted plan. This lack of consistency within the CCC documents is not explained.
- v. CambridgePPF concurs with CCC that as more city fringe areas are developed, the remaining edge areas have increased in value as Green Belt as there is less Green Belt remaining to perform its essential purposes (Para 2.52 of the CCC submitted Plan). We are not convinced that this appreciation has been adequately incorporated in the Study.

iii.a) Does the Inner Green Belt Review take account of the requirements of Paras 84 and 85 of the NPPF to take account of sustainable patterns of development:

- i. Our reservations about the 2012 Study undermine its value for detailed spatial planning around the city fringe. However the Green Belt as a whole does continue to play a positive role in promoting sustainable patterns of development by protecting the setting of the historic city and by protecting the rural character of the surrounding villages.
- ii. CambridgePPF believes that both Councils have adequately considered the consequences of a spatial strategy that is dependent on creating new settlements outside the Green Belt (Para 84 of the NPPF). Clearly the SCDC spatial strategy is dependent on the quality of the proposed new settlements. If these settlements are imaginatively planned and designed so that they provide the necessary facilities to meet the daily needs of the residents, and if high quality reliable public transport service are provided to link the settlements with the main employment centres, then, in the opinion of CambridgePPF, sustainable development of the Greater Cambridge area is better served through the creation of new settlements than through more urban extensions in the city fringe, or development scattered across the villages of South Cambridgeshire.
- iii. Paragraph 2.52 of Policy 4 of the CCC Plan makes the valid point that the Green Belt is a crucial environmental and social asset for Cambridge in providing the green setting for a compact, historic city, and contributing to the high quality of life and place enjoyed by the residents. CambridgePPF agrees that the harm done to these benefits by inappropriate development in the Green Belt more than outweighs the enhanced accessibility of more extensions in the urban fringe (Para 104, Joint Sustainability Appraisal RD/LP/180, May 2013).

iii.b) consistency with the Local Plan strategy for meeting identified requirements for sustainable development:

- iv. CambridgePPF believes that the CCC Plan is inconsistent in the way it uses the 2012 Study to justify meeting its identified housing requirement. The overall spatial strategy in the CCC Plan emphasises the need to keep Cambridge as a compact city with its setting protected by its Green Belt. However, this is inconsistent with the proposal to release more Green Belt land (GB1/2) just to satisfy the anticipated shortfall in the CCC housing numbers.
- v. CambridgePPF believes that the 2012 Study has been used merely as a means of finding a suitable site for its housing shortfall rather than as a tool to promote sustainable patterns of development.
- vi. Policy 4 of the CCC submitted Plan recognises that “the Green Belt is a critical environmental asset for Cambridge in forming the important setting for a compact, historic city, and in contributing to the high quality of life and economic success of Cambridge”. It is difficult therefore to understand why this statement is then undermined by the proposal to harm the Green Belt through further releases for so little reward.

iii.c) that the boundary will not need to be altered at the end of the development plan period:

- vii. Following the significant release in the 2006 Plan, a period of stability might be expected to provide the long-term permanence required by Paragraph 83 of the NPPF. Continuous tinkering with the boundary at the time of each review will compromise the value of the Green Belt. It is proposed that the boundary should now remain unchanged, at least until the sustainability of the 2006 changes have been assessed.

iv. Are the purposes of the Cambridge Green Belt as defined by the Councils in their submitted Plans consistent with Para 80 of the NPPF?

- i. Manifestly not. Indeed, of the five national purposes only two are reflected in the Cambridge sub-set.
- ii. Of the omitted national purposes, ‘checking the unrestricted sprawl of large built-up areas’ would seem of key significance to the Cambridge situation. In the light of the significant release of Green Belt land in 2006, and the current pressures for more urban extensions, it is unacceptable that this purpose has been excluded by the Councils.
- iii. The SCDC Plan (Paragraph 2.28) states that ‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open...’ All the more surprising that this ‘fundamental aim’ is omitted from the purposes of the Cambridge Green Belt as set out in Paragraph 2.29.
- iv. CambridgePPF would like the reassurance that the two national purposes that are reflected in the Cambridge sub-set - to preserve the setting of the City, and to prevent the merging of communities - are sufficient to check the possibility of unrestricted sprawl.

- v. Do the Plans adequately reflect Para 81 of the NPPF which requires local planning authorities to plan positively to enhance the beneficial use of the Green Belt?**
- i. No - the impression is given throughout the Plans that the Green Belt is simply a planning restriction on development.
 - ii. For CCC, the Green Belt corridors running through the city provide great benefit to the residents of Cambridge, and contribute directly to the green and open attractiveness of the city.
 - iii. For SCDC, Policy NH/10 encourages opportunities for increased access to the open countryside in the Green Belt but lacks any clear recommendation as to how this aim is to be delivered. South Cambridgeshire has an excellent Green Infrastructure Strategy (Policy NH/6 and Paragraph 6.28), but it lacks the resources for delivery. The examples of Wandlebury Country Park and Coton Countryside Reserve, both owned by CambridgePPF, show how Green Belt land can with imagination be used for commercial agriculture, wildlife conservation, and public access. The Council's plan should give greater recognition to the role played by the private and voluntary sectors, and to encourage the future contributions they can make.

Matter 6B: Green Belt Boundary Changes in the Cambridge City Local Plan

1) Sites GB1 and GB2:

- i. What would the impact of the proposed boundary changes be on the purposes of including land on the Green Belt?**
- i. GB1/GB2 lie at the foothills of the Gog Magog hills. The 'Gogs' are an iconic element in the Cambridge landscape, both views from the city with the hills as the backdrop and views from the hills looking over at the cityscape and skyline of Cambridge. As such, these sites are of significance in protecting the setting of the city. Although GB1/GB2 may be on the flatter agricultural land, their development could set the precedent for further development to creep out towards the Gogs. The views of Cambridge will be seen over the roofs of the new development in the foreground.
 - ii. The impact on Green Belt purposes of development at GB1/2 were assessed as Medium by the 2012 Study (Sector 11, Areas 1 and 2). Why have these sites been proposed for development when there are other substantial areas to the East of Cambridge assessed as having low significance but are not being proposed?
- ii. Are there any other reasons why development of these sites should be resisted or any overriding constraints to development?**
- i. The proposal to develop these sites raises a number of serious objections relating to the adequacy of the supporting infrastructure, distance to essential services and facilities, traffic congestion, loss of good quality agricultural land, and the threat to biodiversity, especially damage to the Netherhall Farm Meadow County Wildlife Site. These are elaborated in the written submissions submitted by the Wildlife Trust and by John Meed for the Save the Green Belt Campaign.
 - ii. The Inspector's Report for the 2006 Local Plan rejected GB2 (Omission Site No. 5 – Netherall Farm (SW corner of Site CC911) on the grounds that the site is open land of importance to the Green Belt, that it has several views important for the setting of

Cambridge, and the lack of screening of any new development. These objections still apply.

2) Sites GB3 and GB4:

i. What would the impact of the proposed boundary changes be on the purposes of including land in the Green Belt?

- i. These sites were assessed in the 2012 Study as being of Medium importance to the purposes of the Green Belt and of Medium significance of the impact of development on the Green Belt. They are therefore sites of some importance in terms of their Green Belt value and the setting of Cambridge. They are also important for the Cambridgeshire Green Infrastructure Strategy.
- ii. Fulbourn village faces the very real risk of becoming subsumed into Cambridge by ribbon development along the Fulbourn Road. The expansion of the Peterhouse Technology Park (GB3/4), the Cambridge Capital Park, and the re-development of the Ida Darwin Hospital will all contribute to this risk. Maintaining clear open countryside as a Green Belt buffer between the city and Fulbourn on both sides of the Fulbourn Road is important to meet the purposes of the Cambridge Green Belt.
- iii. The Fulbourn Road already has a serious problem of traffic congestion in the rush-hour. Any development must include a comprehensive Transport Plan to show what mitigating measures are to be applied.
- iv. The site adjacent to GB3 on the Western boundary is an SSSI with national important biodiversity including nesting peregrine falcons. The Western half of GB3 should therefore be landscaped with extensive tree planting to provide an effective buffer.

ii. Are there any other reasons why development of these sites should be resisted or any overriding constraints to development?

- i. The proposal for the extension of the Peterhouse Technology Park does not demonstrate how the exceptional circumstances required to re-draw the Green Belt boundary are to be satisfied. The fact that the bulk, but not all, of GB3/GB4 will be occupied by ARM is irrelevant as the submitted Plan is not occupier-specific, so the case for exceptional circumstances must be made.
- ii. CambridgePPF believes that the requirement to demonstrate how companies wishing to locate to Cambridge contribute directly to the Cambridge Cluster should be re-instated if Green Belt land is to be released for commercial use. If the Peterhouse Technology Park is to be extended, then potential occupiers should be required to show why being in Cambridge is crucial to their activities and how they contribute to the Cambridge Cluster.

Matter 6C: Green Belt Boundary Changes in South Cambridgeshire Local Plan

1) Land at Fulbourn Road East

i. What would the impact of the proposed boundary changes be on the purposes of including land in the Green Belt?

The same considerations will apply as for GB3/GB4 above.

ii. Are there any other reasons why development of these sites should be resisted or any overriding constraints to development?

- i. It is understood that the landowner, Wright's Clock Fund, does not want to sell the land for development so the site is therefore undeliverable.