

**CAMBRIDGE CITY AND SOUTH CAMBRIDGESHIRE  
LOCAL PLAN EXAMINATIONS**

**MATTER 6 GREEN BELT**

**Name of Representor: Jeremy Jones (3747)**

**MATTER 6A**

**General issues**

***i. a) Does the level of need for new jobs and homes (paragraph 2.54 of CCC LP and paragraph 2.32 SCDC LP) constitute the exceptional circumstances necessary to justify the proposed removal of sites from the Green Belt (paragraph 83 of the Framework and paragraphs 044 and 045 of Planning Practice Guidance).***

No, for three reasons:

- Firstly, demonstration of exceptional circumstances requires a robust evidence base, and earlier sessions have uncovered that the housing need numbers are relatively arbitrary – a ‘best guess’ taking into account a number of forecasts. The 14,000 figure has been retained despite a 16% lower forecast (12,100) in the 2013 EEFM housing need calculation; we are told to accept that this change is “within an acceptable range”. It also takes no account of the stabilisation of occupancy rates highlighted in the 2012 EEFM run, as is recognised in RD/Strat/280 (7.2). RD/Strat/280 also notes (in 12.1, 12.2 and 12.3) that the 14,000 number is in fact an over-allocation, ‘more than adequately’ providing the homes required. Releasing Green Belt land in order to over-achieve against a need is clearly not the intention of the exceptional circumstances qualification. As already noted in the sessions, the relatively small percentage of the total homes delivered that will come from Green Belt release within Cambridge’s Local Plan is also less than the rounding error in the calculations based on table 30 (population) and 32 (occupancy rates to houses) in RD/Strat/80, thus:
  - Calculation methodology:
    - Population/Occupancy rate=Dwellings
  - Existing supply 2011:
    - $123000/2.54=48425$
  - Forecasted need 2031:
    - $150000/2.43=61728$ ;
  - 2031 forecasted need less 2011 supply:
    - $61728-48425=$ **13,303**
  - GB1/GB2 contribution to Cambridge Local Plan (RD/Sub/C/010) dwelling provision:
    - 430 dwellings
  - Cambridge Local Plan dwelling provision 2011 to 2031 (para 2.43, table 2.3) excluding Green Belt contribution
    - $14,191-430=$ **13,761**

This shows how, even without the Green Belt sites, Cambridge's Local Plan more than provides the required dwellings forecasted by the calculations, if the basic rounding errors are removed.

On this basis, a case for exceptional circumstances cannot be proven.

- Secondly, whilst CCC conducted a reasonably extensive search of brownfield alternatives, a failure to adopt a consistent brownfield review meant that SCDC limited its discovery to merely those locations identified in the basic Call for Sites. This not only fails against the fundamental objectives of the NPPF's Duty to Cooperate, but also its policy of brownfield first.
- Finally, in Thundersley, Essex, the Communities Secretary's overturning of the Planning Inspectorate's approval of an application to build 165 homes on Green Belt land highlighted that need cannot be allowed to override national Green Belt policy. The intervention was despite a recognition of the region's need to combat a 'severe lack' of housing. The Communities Secretary's letter stated: "In the light of all material considerations in this case the secretary of state is concerned that a decision to allow this appeal for housing in the green belt risks setting an undesirable precedent for similar developments which would seriously undermine national green belt policy."

In the new Planning Practice Guidance Paragraph 044 (Reference ID: 3-044-20141006), that message was reiterated, noting that need alone cannot be used as the only consideration when compiling Local Plans, and thus cannot override issues of harm to Green Belt land. Mr Pickles MP stated in the Government's press release announcing the new guidance:

*"This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities [lost] to unnecessary development. Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area."*

***b) Bearing in mind the Framework's indication that development in the Green Belt should be resisted, what would be the consequences if the boundary of the GB were to be retained in its current location?***

The reality is that there would be very little in the way of consequences if the boundary of the Green Belt were to be retained in its current location. NPPF Paragraph 14 allows Cambridge to acceptably fail to meet that need in specific situations, including if the only remaining option is Green Belt development:

- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.*

The footnote to this second part provides a list of locations where the specific policies in the Framework indicate development should be restricted, which includes "land designated as Green Belt". Under the terms of this highlighted paragraph in the Framework, Cambridge City Council – in **only** being able to meet the objectively assessed need through proposing to develop on Green Belt land, is therefore **permitted to fail in meeting that need**. In PPG 044, the DCLG reiterates the point, and PPG 045, the advice goes further to specifically pave the way for acceptable failure to meet need if Green Belt is the only other option, noting that authorities should "*take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.*" (Paragraph: 045 Reference ID: 3-045-20141006)

***ii. Does the 2012 Inner Green Belt Study provide a robust justification for the proposed boundary changes? If not why not? (Where issues relating to the methodology used to undertake the study are in dispute, the Inspector encourages representors and the Councils to prepare Statements of Common Ground to identify areas of agreement and dispute).***

No. The Draft SHLAA was published in July 2011. The Inner Green Belt Review was authored by the Councils themselves, and was conducted as late as May 2012, by which time it had already been identified that there was a possible shortfall from the SHLAA. As a result, this review cannot be considered entirely objective, as Green Belt release was already perceived as potentially required. [Incidentally, CCC's Local Plan 2.53 clearly indicates the Councils' shared prejudice against the Green Belt: "Both Cambridge City Council and South Cambridgeshire District Council are keen to see the Green Belt as a positive rather than a purely negative planning tool." The implication here of 'keen to see' is that clearly they currently do not see the Green Belt as a positive planning tool, but rather as a 'purely negative' one.]

Furthermore, the study misguidedly reinterprets the defined purposes of Green Belts as established unequivocally in the NPPF, and in doing so undermines the intended protection of the policy. It also discreetly ignores the fifth obligation placed onto local planning authorities by the Green Belt, to focus on urban regeneration. The result is the significant watering down of the obligations on the part of the planning authority. This trend is continued in the CCC LP itself as four becomes three, in an attempt to further reduce the authority's responsibility.

Crucially, there is very little fact-based, detailed justification for the distinction between zones 4 and 5 in the review (south east of the City towards the Gog Magog Hills) and the two Green Belt locations on Worts' Causeway (GB1 & GB2). The Appraisal document (RD/Strat/200) states in 5.5: "In summary, it has been found in the course of this appraisal that areas where the City is viewed from

higher ground or generally has open aspects, or where the urban edge is close to the city centre are more sensitive and cannot accommodate change easily." Given that GB1 and GB2 are both viewable from the higher ground of Lime Kiln Hill and the Gog Magog Hills and have open aspects, two of the three criteria for an inability to easily accommodate change.

Finally the methodology fails to provide sufficient justification as to why the results of the 2002 Green Belt Review should be overturned, particularly for GB1 and GB2.

***iii. Does the Inner Green Belt Review take account of the requirements of paragraphs 84 and 85 of the Framework, notably the need to take account of sustainable patterns of development; to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and that the boundary will not need to be altered at the end of the development plan period.***

The implication of this question is that sustainability and Green Belt development are consistent and acceptable. However, throughout the NPPF, it is reiterated that sustainable development and Green Belt protection are not mutually exclusive. The Framework is very clear in its support for sustainable development wherever development is permissible, and strong protection against development in areas where it is not, including Green Belts. Sustainable development should only be considered in suitable locations, and Green Belt is not a suitable location. Thus development should not be to the detriment of the protected Green Belt, as reinforced in paragraphs 7, 8, 9, 14, 17(3), 47(3), 79, 89, 114, 152 and 156. Consequently, assessments of sustainability are ultimately irrelevant to Green Belt land review. As Paragraph 89 puts it: "A local planning authority should regard construction of new buildings as inappropriate in Green Belt" And the clarifications in PPG serve to remind us that Green Belts should be characterised by their permanence.

If we are forced to examine sustainability in spite of the NPPF, the specific sustainability characteristics of GB1 & GB2 in the CCC LP fail against CCC's own sustainability criteria (800m walking distance): nearest Shops and Chemist (1.4km), Bunnybrooke's Nursery (1.6km), Queen Edith's Primary School (1.8km), Netherhall Secondary School (1.9km), Supermarket (2km), Post Office (2.2km) and Public House (2.2km). High Quality Public Transport Service should be within 400m - nearest bus stop is Babraham Road at 600m and nearest high quality stop is >900m. Furthermore, neither Worts' Causeway nor Lime Kiln Road have width to add cycle paths. This will encourage people away from walking, cycling and public transport into cars.

Regarding a future need to alter the Green Belt, the attempt by Cambridge City Council to devalue some Green Belt land in comparison to other in order to support an argument for release establishes a an insidious precedent, especially for GB1 and GB2 which are already small parts of a much larger (but currently rejected) application, CC911.

CCC has attempted to suggest that by releasing some land from the Green Belt the remainder becomes more valuable to protect, but that is comparable to

hunting an animal close to extinction and then proclaiming the importance of protecting it.

***iv. Are the purposes of the Cambridge Green Belt, set out at paragraph 2.50 (Table 2.4) of CCC LP and paragraph 2.29 of SCDC LP, consistent with paragraph 80 of the Framework.***

Absolutely not. As mentioned above, the Councils appear to have reinterpreted some of the national purposes to suit their own needs, and simply jettisoned others. It is astonishing. Paragraph 80's Green Belt purposes must not be allowed to be undermined in this way. It is entirely irresponsible planning, simply to circumvent obligations put in place to prevent the kind of 'lazy planning' that sees repeated incursions into the Green Belt.

***v. Do the Plans adequately reflect paragraph 81 of the Framework which requires local planning authorities to plan positively to enhance the beneficial use of the Green Belt?***

No. As mentioned above, there appears to be a significant prejudice on the part of the Councils that the existence of Green Belt land is a planning inconvenience. Paragraph 81 states:

*"Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."*

Residents of Worts' Causeway and the surrounding area see no positive conceivable enhancement through the proposed release and development. The landscape will be irreversibly damaged rather than retained or enhanced, the visual amenity will be impacted, whilst the damage to biodiversity could be disastrous and the surface and subsurface water flows affected in ways that yet to be considered. Local resident and wildlife expert John Meed has conducted regular surveys on the bird populations in the GB1 and GB2 areas in conjunction with – and supported by – CCC's own team. These surveys have identified many significant species nesting in the area, including some red listed ones, and CCC internal correspondence exposed through a Freedom of Information request has identified that insufficient consideration of mitigation has been conducted by CCC in order to prevent significant damage to biodiversity through release and development of GB1 and GB2.

NPPF Paragraph 117 states that planning policies should "promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations". Wildlife reviews have indicated the presence of a significant number of priority species in the GB1 and GB2 area, the habitat for which would certainly not be preserved, restored or re-created through a replacement with concrete, tarmac and bricks.

Paragraph 123 notes that "Planning policies and decisions should aim to...identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."

GB1 and GB2 are characterised by their peace and tranquillity, and are a favourite for a large number of local walkers, whether solitary, enjoying the stillness, or with children or pets. The footpath that runs alongside Worts' Causeway (part of which runs within GB2) has been a much-loved local amenity for generations (frequently mentioned in publications on the City) and should be preserved.

## **MATTER 6B:**

### **Green Belt Boundary Changes in the Cambridge City Local Plan**

#### **1) Sites GB1 & GB2**

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

Releasing the land on Worts' Causeway would be entirely contrary to the purposes of the Green Belt and would fly in the face of all the protections afforded to the Green Belt in the National Planning Policy Framework.

The NPPF states that the Green Belt's purposes are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The land at GB1 and GB2 deliver against all of the five national Green Belt purposes. The sites abutt the built-up area of Queen Edith's housing, and the land forms part of a buffer zone between Queen Edith's and Fulbourn to prevent merging. The land is not scrubland or unused derelict space – both locations are high quality arable land and are fully representative of the countryside that the Green Belt (and the Communities Secretary) are fighting to protect. The sites form part of the setting of the City from the higher ground of Lime Kiln Hill and the Gog Magog Hills, and are consequently intrinsic in the retention of the special compact character of this historic city of Cambridge. And finally the local planning authority has admitted privately that it considers Cambridge 'full', and that no further development is possible within the City boundary. Given a current unwillingness to undertake major regeneration of severely deprived neighbourhoods in Cambridge, the authority appears resistant to the encouragement intended. Permitting further Green Belt release would only serve to promote this resistance and undermine further the principles enshrined in national Green Belt policy.

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

Traffic congestion is already a significant problem in this area and will be compounded further by the impending build out of the former Bell Language School site between the junction entrance for GB2 and the designated accident blackspot of the Addenbrooke's Hospital roundabout. No mitigation has yet been proposed, but of greater concern is that little would appear to even be possible.

The sites were graded as having medium significance to the Green Belt in the 2012 boundary review, and there has been little justification as to why any change to the protection afforded in the 2002 Green Belt review should occur. The landscape in the south east area of Cambridge has not certainly not changed in any way in that period. Indeed, the Inspector's Report for the 2006 Local Plan rejected GB2 for inclusion and the same 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?**

Fulbourn village is precisely the kind of location for which the protections afforded by Green Belt were intended. Further development along the Fulbourn Road risks increasingly the likelihood the subsuming of this distinctive town into yet another Cambridge suburb.

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

There are significant issues of congestion along the Fulbourn Road, and land adjacent to GB3 an SSSI with national important biodiversity including nesting peregrine falcons. The risk of biodiversity damage is significant.

**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?**

As detailed 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. The site is apparently to be removed from the SCDC LP as the landowner does not want to sell it for development, and it is therefore undeliverable.