

Cambridge City and South Cambridgeshire Local Plan Examinations

MATTER 6 - GREEN BELT

On behalf of Grosvenor/Wrenbridge (ID. 21321)

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Prepared by

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6A General issues

i. 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). 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?

1. Yes. Section 39 of the Planning and Compulsory Purchase Act 2004 Act requires that

“The person or body must exercise the function [plan-making] with the objective of contributing to the achievement of sustainable development.”

2. Given the threat of Climate Change, the achievement of sustainable development is at the heart of the planning system. The core planning principles of the NPPF include supporting the transition to a low carbon future and that local authorities should:

- support reductions in greenhouse gas emission and reduce congestion (para. 30);
- support a pattern of development which facilitates the use of sustainable modes (para.30);
- ensure that developments which generate significant movement are located where the need for travel will be minimised (para. 34);
- should exploit opportunities for the use of sustainable transport modes (para. 35).

3. The Submission Cambridge City Local Plan sets out 15 strategic objectives (page 12). The first of those is to contribute to the vision of Cambridge as an environmentally sustainable city, where it is easy for people to make a transition to a low carbon lifestyle. It further states that this includes *“...securing radical reductions in carbon emissions...”*. This objective is rightly at the forefront of the strategy.

4. Paragraph 1.6 of the Submission South Cambridgeshire Local Plan identifies the challenge of dealing with a changing climate. Paragraph 1.9 states that underpinning the *“whole”* of the Plan is the commitment to sustainable development. Objective S/2f seeks to maximise potential for journeys to be undertaken by sustainable modes of transport including, walking, cycling, bus and train. Chapter 4 is entitled *Climate Change* and sets out the scale of the challenge and the urgency required to deal with it.

5. The LPAs accept that the edge of Cambridge is the most sustainable location for development after the urban area itself. Indeed, the LPAs accept that there are *exceptional circumstances* for releasing land from the Green Belt as some land is indeed being released.

6. Notwithstanding that agreement, we consider that the need to tackle climate change, the need to address the chronic affordability issues and ever increasing house prices at Cambridge, the need

to support and foster the Cambridge Cluster, and the fact that development at Cambridge East by 2031 will be on a far lesser scale than envisaged at the time of the last review, individually and collectively represent exceptional circumstances to justify further releases from the Green Belt.

7. The most significant way that the local plan can achieve sustainable development and tackle the threat of Climate Change is through the location of development. Our response on Matter 7 includes analysis by WSP of modes of travel to work from Census 2011 and deals with the sustainable travel implications of not releasing further land from the Cambridge Green Belt. If further land isn't released from the Green Belt congestion will increase, air pollution will increase and conditions for cycling will worsen. There is a significant risk therefore that fewer people will wish to cycle in Cambridge as a consequence of the strategy.
8. Tackling Climate Change requires urgent and concerted action. Encouraging people to move away from their cars is a major challenge. Yet in Cambridge, more so than anywhere in the country, the conditions all ready exist to achieve high levels of travel by non-car modes. A consequence of retaining the Green Belt boundaries as they are will be more travel by car, increased congestion, higher carbon emissions and a greater contribution towards Climate Change.
9. Without Green Belt releases there will be more travel by less sustainable modes and increases in travel distances. As a consequence there will be a greater need for infrastructure provision. However, there will be less resource available to fund such infrastructure given that the CIL for residential development in South Cambridgeshire (away from Cambridge) is proposed to be set at £100 per square metre and that the CIL for Cambridge is proposed at £125 per square metre. The CIL for development at Cambridge is 25% higher and consequently, development at Cambridge will create a lesser need for infrastructure, yet will generate more funding.
10. In our statements on Matter 3 we included analysis of house prices in the Cambridge area, demonstrating how prices in Cambridge are rising significantly differently to the national picture and that house prices in Cambridge now stand at almost 30% above the 2007 peak. House prices at Cambridge have continued to rise despite increases in levels of completions.
11. Our Statement on Matter 3 also includes data on ratio of lower quartile earnings to house prices. In Cambridge that ratio is 10.3 compared to 8.8 in South Cambridgeshire and 6.9 across Cambridgeshire as a whole. The national average is 6.5. Whilst affordability improved in Cambridgeshire as a whole between 2012 and 2013, it worsened in both Cambridge and South Cambridgeshire.
12. A consequence of retaining the Green Belt boundaries in their current location is that Cambridge will continue to experience chronic issues in relation to affordability and high house prices. The

SHMA projects affordable housing across the plan period based on current needs. It does not take into account worsening affordability. Based on submitted policies the Local Plans will not meet affordable needs as projected, nor need which will arise because of worsening affordability. If the Green Belt boundaries are retained in their current locations the needs for new affordable homes will not be met.

13. Cambridge City's Annual Monitoring Report 2008 identified that by 2026 4,030 homes were expected to be delivered at Cambridge East. South Cambridgeshire's report of the same year anticipated 5,350 by 2023. These total 9,380, leaving 1,620¹ to be delivered. Given that South Cambridgeshire's AMR was projecting annual completions of 500 a year in 2023 and Cambridge City 300 a year in 2026, it is clear that the LPAs expected the whole 11,000 homes to have been delivered by 2031. The 2013 Annual Monitoring (RD/AD/270 and RD/AD/350) reports identify that 1,818 homes are expected to be delivered at Cambridge East by 2031 – 9,182 fewer than expected in 2008. The full development of Cambridge East was an integral part of the strategy put in place following RPG6 to fundamentally shift development patterns in the Cambridge sub-region. Importantly, Cambridge East was an essential element of the strategy which should *“allow scope for, rather than constrain, continuing development beyond 2016.”* Given the emphasis in national and local policy in tackling Climate Change, we consider that the loss of 9,182 homes from the edge of Cambridge adds to the exceptional circumstances to justify further review of and release of land from the Cambridge Green Belt.
14. It is clear that both plans recognise the urgent need tackle Climate Change and the role of the local plans in dealing with the location of development. However, the actual effect of the plans will be to worsen the impact on Climate Change, increase congestion, increase the need for infrastructure provision, generate less money to fund infrastructure and fail to address the chronic affordable housing and affordability issues at Cambridge.

¹ Page 139 of the AAP sets out a trajectory for delivery of 11,000 homes in total

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).*

15. No. Attached at Annex 1 is an analysis of the 2012 Inner Green Belt Study (RD/Strat/210) by Terence O'Rourke (ToR). This identifies issues with the Councils' approach with reference to land at Trumpington where relevant to illustrate the issues with the 2012 Study.

16. The approach appears not to be based on the principles established by the Structure Plan Review 2003. The Councils' Study at 2.1 lists the national purposes of green belt and at 2.2 says that these can be applied to Cambridge and sets out how they apply. Paragraph 8.10 of the Structure Plan Panel's Report (Annex 2) states clearly that Cambridge only has a Green Belt because it is a historic city and that it follows that all five purposes are not necessarily relevant to this Green Belt.

17. The Council's report then sets out four purposes for the Green Belt. It was agreed through the Structure Plan and enshrined in the subsequent Cambridge Local Plan and Core Strategy that the purposes of this Green Belt are to:

- Preserve the unique character of Cambridge as a compact dynamic city with a thriving historic core
- Maintain and enhance the quality of its setting
- Prevent communities in the environs of Cambridge from merging into one another and with the City

The four criteria set out at 2.2 of the Council's Study do not follow those agreed principles. The purpose, for example, of protecting green corridors running into the city is not a purpose in its own right but is part of other purposes. This leads to errors in the assessment.

18. The overall approach amalgamates areas of land into as large parcels as possible. That necessarily means that the impact and assessment is likely to be greater on green belt purposes. Given that the LPAs accept that Cambridge is the most sustainable location the assessment should have considered land at as small a scale as possible so that land which could be released from the Green Belt without any impact is released. A consequence of the Council's approach is that land is incorrectly assessed. For example, in Sector 7, all land is classed as "river corridor", whereas land falls within areas of different character.

19. Paragraph 2.29 of the Submission Cambridge Local Plan states that removing "large" sites *could* irreversibly and adversely impact on Cambridge's special character which would risk jeopardising its economic success. However, the study looks at very large tracts of land and therefore has not established whether smaller areas of land could be released without detriment to Green Belt purposes. In our view the factors which have a greater impact on Cambridge's special character

and will jeopardise its economic success and attractiveness as a place to live are the significant traffic congestion issues and chronic affordability issues.

20. The findings are inconsistent with previous assessments. The updated study identifies the whole of Sector 7 as “defining character”. The LDA 2002 report (RD/Strat/180) places a significant portion of Sector 7 as “connective” landscape – the lowest category of Green Belt asides from negative features. No mention is made of the opportunity to enhance the *Visually Detracting* feature of the M11.
21. The 2012 report itself is not backed up by any actual evidence. There are no plans or photographs. Sector 7 is an extensive piece of land and the text is sparse.
22. The report is also based on incorrect information and is inconsistent. For example, it refers to all land at Sector 7 as being “*River Corridor*” although then later refers to “*abuts river corridor*”. Views of Trumpington Church are identified, but that ignores that those views will be lost once the current consented scheme is built out. The report also refers to “*significant views*”. The Councils’ study identifies a “*Minor*” view across the site from Hauxton Road. The significant views shown from land further south and located on land that is not accessible to the public. ToR has reviewed views from the south from land that is accessible. In these views, Sector 7 is either mostly screened by intervening vegetation and/or the landform, or where it is visible the M11 motorway, noise barrier and abrupt urban edge of land to east of Hauxton Road are intrusive.
23. It is not clear how the report has arrived at conclusions regarding land and therefore how it has attributed value and importance to Green Belt purposes.
24. Additional criteria are added on *separation* and “*rural character*”. However, that ignores that not all the land within the Green Belt has rural character. For example, at 3.3.2 Cambridge Landscape Character Assessment April 2003 (CLCA) (RD/Strat/190) describes how the land between the A14 at Histon and Grantchester contributes to “*Defining Character*”. The report describes the defining character of that area as being mixed use and including College playing fields, farmed land and research buildings. The CLCA identifies the “*Defining Character*” as including “*urban edge characteristics*” (p51). It is clear therefore that different parts of the Green Belt have different “*Defining Characteristics*” and those should form the basis of an assessment should, not a simple assertion of “*rural character*”/“*rural landscape*”.

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.*

25. The review does not appear to take into account paragraphs 84 and 85. It appears to approach the subject with the aim of restricting the release of land. This is clear from the approach which amalgamates large tracts of land into single blocks for assessment. Given the clear sustainability advantages of development on the edge of Cambridge, we consider that the Review should look at land at as fine a grain as possible to ensure that land which can be released from the Green Belt without significant detriment to its purposes is released.

26. Both plans identify that the edge of Cambridge is the most sustainable location after the urban area. The approach does not therefore accord with development strategy which the local plans purport to follow. Any land which can be shown to be capable of development without significant detriment to Green Belt purposes should be released from the Green Belt in order to ensure the plan is consistent with the overall strategy set out. In addition, where it is concluded that development would harm the purposes of the Green Belt, consideration needs to be given as to whether the benefits of developing that land outweigh the harm caused to Green Belt principles. The assessment does not consider that.

27. There appears to be no assessment as to whether the boundaries will need to be altered again at the end of the plan period. Neither the SHMA (RD/Strat/090) nor the County Council's projections (RD/Strat/080) look beyond 2031, and therefore, simply no assessment has been made of housing needs and therefore there can have been no assessment of whether land would be needed for development and therefore whether the Green Belt boundaries will endure. The Submission Plans make provision for the delivery of 1,650 dwellings a year. The Cambridge City Submission Plan does not identify any sites on which there will be dwellings remaining to be built beyond 2031. It is clear that there will need to be a review of the Green Belt again *before* the end of the Plan period, contrary to the NPPF.

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.*

28. It is agreed that the purposes of the Green Belt set out in the local plans are consistent with the NPPF. However, as we note above, the relationship between purposes and the study are unclear.

- 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?*
29. No. The South Cambridgeshire Recreation and Open Space Study (July 2013) (RD/CSF/060) was commissioned to investigate the current quantity and quality of recreation and open space provision within the District and assess the extent that this is meeting local need. The study identifies that whilst some settlements have adequate provision, others do not and overall there is a need for additional provision. The study identifies that in May 2012 there were 6,283 who would like to participate in sport (para. 6.8) and that there is a need to continue to secure new and improved open space provision (para. 6.10).
30. The study recognises that *‘There is significant cross-boundary usage of recreation open space, with Cambridge residents using facilities in South Cambridgeshire and vice versa. This is particularly prevalent in villages on the edge of Cambridge and new settlements...’* (para. 5.3).
31. The Cambridge City Open Space and Recreation Strategy (2011) (RD/NE/050) identifies that the supply of sports pitches in Cambridge is significantly below that required under its adopted open space standards. Paragraph 6.3 states that *“Within the existing built up area of Cambridge, there are limited opportunities for creating new open space”* and that *“The optimum use of existing open space must be made, and opportunities must be sought to improve existing spaces and address deficits”*. Paragraph 6.8 states that *“There are opportunities for new provision... including within the Green Belt.”*
32. The NPPF states at para. 81 that *‘local planning authorities should plan positively to enhance the beneficial use of the Green Belt’*, making specific reference to opportunities for outdoor sport at such locations. The South Cambridgeshire Adopted Development Control Policies DPD (2007) also includes an objective to provide for improvements in outdoor sport and recreation in the Green Belt.
33. Policy NH/10 of the Submission South Cambridgeshire Local Plan states that recreation will be encouraged where it would not harm the objectives of the Green Belt. We consider this should say “purposes”. The policy goes on to state that recreation facilities will not be allowed where the cumulative impact would be detrimental to Green Belt objectives. Again this reference should be to the *purposes* of the Green Belt. Given the acknowledged shortfall in outdoor sports provision at Cambridge and the lack of opportunity to provide for sporting needs within the urban area, necessarily if outdoor sports needs are to be met at Cambridge development will need to take place within the Green Belt. Indeed, that is a characteristic and positive feature of much of the Cambridge Green Belt.

34. Policy 4 of the Cambridge Local Plan is not consistent with the NPPF. It states new development will not be permitted except in very special circumstances. It does not appear to accept that there are *any* uses within the Green Belt which are appropriate and therefore even those uses which the NPPF identifies as appropriate are ruled out. It does not therefore plan positively to enhance the beneficial use of the Green Belt.

Conclusions

35. Exceptional circumstances exist to justify further release of land from the Cambridge Green Belt.
36. Without further release there will be significant and severe negative impacts on congestion, travel distance, travel mode, carbon emissions, affordable housing need and affordability.
37. The 2012 Inner Green Belt Study does not form an appropriate basis on which to assess land within the Cambridge Green Belt, there has been no assessment of whether the boundaries will endure and no planning for beneficial use of Green Belt. The plans do not plan positively for beneficial use of Green Belt.
38. Both plans therefore are unsound and fail in relation to the statutory duty of S39 of the Planning and Compulsory Purchase Act 2004 Act and the policies of the NPPF.