

Matter 6 Green Belt

6A General issues

1. Introduction

- 1.1. This statement has been prepared by HAIVAG to provide comments against the SCDC Local Plan Matter 6 – Green Belt.
- 1.2. It should be noted that many of the comments in this statement can be applied to Green Belt issues across the SCDC Proposed Submission Local Plan and suggested development sites. However, as its name suggests, HAIVAG is principally concerned with the Green Belt and development sites in and around Histon and Impington and the statement should be read in this context.
- 1.3. HAIVAG object to removing this land from the Green Belt for the reasons set out in this statement. HAIVAG also strongly object to other representors' suggestions to increase the number of new homes at site H/1:d and to add further sites on Green Belt land such as Buxhall Farm.
- 1.4. This statement is without prejudice to HAIVAG's other concerns in relation to development in the Histon and Impington area. These include insufficient school places, lack of local healthcare capacity, increased traffic on narrow residential roads and the risks of flooding.

2. Exceptional Circumstances

- 2.1. HAIVAG consider the NPPF to be the defining statutory policy document that prescribes the circumstances in which land can be removed from the green belt.
- 2.2. As such any other documents are subordinate to the NPPF and should only be used in informing the interpretation of the NPPF.
- 2.3. Paragraph 83 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. Recent government statements have reinforced this policy.
- 2.4. It is therefore important to consider what constitutes exceptional circumstances and then apply that principle to the specific instances. HAIVAG consider that this can be achieved using Chapter 9 of the NPPF.
- 2.5. The new guidance (paragraphs 044 and 045 of the PPG) makes it clear that councils do not have to build on the Green Belt to meet the 5 year housing target. SCDC has identified Green Belt sites that are to be developed in order to meet the proposed housing need in the area. They have used the argument that 'exceptional circumstances' exist because of the need to meet housing targets, and have argued that this is specifically due to the fact that the Marshalls Land will not become available during the Plan period.
- 2.6. We question whether the 'exceptional circumstances' exist, particularly as we believe that SCDC did not thoroughly seek alternative sites to fulfil their responsibility to protect the

Green Belt. Indeed they have included some Green Belt sites in the Plan very early on in the development sequence. The council appears to have used a purely reactive approach, relying on the 'Call for Sites' strategy without doing a thorough appraisal of land that may be available that would protect the Green Belt from inappropriate development. We do not believe that all other possibilities for building new homes in the Cambridge & South Cambs area have been fully explored before including land in the Green Belt (see Appendix 1).

- 2.7. There has been an assumption that Green Belt in villages is of less importance than Green Belt that protects the historic character of Cambridge. The criteria used to judge this within villages was not appropriate as it related specifically to Cambridge. Descriptions about Histon being an area where 'distinct views of the City are absent' are inappropriate and demonstrate that proper regard to the Green Belt in this particular area, for example, was not given.
- 2.8. We have not seen any evidence to suggest that 'exceptional circumstances' were considered for each separate Green Belt site under consideration. If sites were rejected through previous Plan reviews due to a finding of no exceptional circumstances to amend the Green Belt boundary, there needs to be evidence of what has changed to justify 'exceptional circumstances' to warrant its inclusion in the new Plan.
- 2.9. If the boundary of the Green Belt were to be maintained in its current location, there would be a shortfall in meeting the numbers of homes identified in the SHMA initially but this would force both councils to reconsider their options for where development would be appropriate, thus protecting the Green Belt. In the villages the housing allocation in the Green Belt is 455 homes, a relatively small number as a proportion of the total number of new homes in the South Cambs Local Plan. Each of these village sites should be re-assessed using the full criteria given in the NPPF and in the light of the new guidance (paras 044 and 045). They should be rejected from the plan unless strong evidence emerges that there are exceptional circumstances relating to a *particular* site and the benefits of developing that site outweigh the harm to the local community.
- 2.10. There should be more focus on the views of local communities. Some communities may consider it necessary and appropriate to build new homes on Green Belt in their community and where this is supported by the Parish Council, this should be considered. Where there is evidence that building on Green Belt will impact on the overall sustainability of a community and the Parish Council does not support development in the Green Belt, these views should be respected.

3. Application of the NPPF to Histon and Impington

- 3.1. The following table sets out various sections of the NPPF and how it can be applied to Histon and Impington in general including further sites proposed by other representors such as Buxhall Farm and to the specific suggested site H/1:d.

NPPF 2012 Chapter 9 “Protecting the Green Belt”	Green Belt in Histon and Impington In General, including Buxhall Farm.	Site Reference H/1:d Land North of Impington Lane, Impington predominantly on Green Belt land.
<i>Para 79</i>	There is productive good quality ALC grade 2 farm land. There are also well used permitted paths between fields. For Buxhall Farm (CCC) the owners wish to obtain a higher income from this farmland by developing it for housing. This site has a well defined straight line Green Belt boundary.	The land contributes to the openness in that part of the village. HAIVAG do not consider that there should be any changes to the Green Belt boundary.
<i>Para 80</i>	The green belt land in Impington and at Buxhall Farm: Checks the unrestricted sprawl of the (large, 3km x 2km) Histon/Impington settlement to the North East of the village. Contributes to the isolating effect of farmland separating Histon from Cottenham. The existing boundary stops encroachment on to productive good quality ALC grade 2 farmland. Maintains the mix of open farmland & village scene that characterises this part of Cambridgeshire. All recent Histon/Impington planning permissions have been on brownfield sites within the village.	The larger intrusion into the green belt requested by Bidwells amounts to sprawl and encroaches on the countryside. Bidwells’ objection is an easy option considering that further smaller brownfield opportunities within the villages are gradually being exploited. Release of this land will act as a ‘stepping stone’ with further land being developed North.
<i>Para 81</i>	This existing Green Belt land currently incorporates permitted paths between the fields, which are well used by villagers. The development will not enhance the landscape	No proposal to enhance the beneficial use of the Green Belt.
<i>Para 83</i>	There do not appear to be any exceptional circumstances concerning the villages of Histon and Impington that would justify a change in this Green Belt boundary.	The SCDC approach of rationalising the original boundary into an easy to recognise and maintain “straight line” while permitting a smaller development is to be commended. It is however unclear that this constitutes exceptional circumstances.
<i>Para 84</i>	Recent (brown field) developments within Histon & Impington have absorbed any slack in the sustainability of the combined villages. It is felt by the	Previous recently approved development land has been on exclusively brown field sites released by contraction of the village’s older industrial and retail

	<p>villagers (supported by their Parish Council) that further development including the huge the scale of Buxhall Farm is so significant, that it should be resisted. Such a large increase in village population and the extension of the village boundaries threaten to move the settlement in the direction of a small town. It is felt that such a change will have a negative impact on the village character and way of life, threatening the social and environmental aspects of sustainability, while there are minimal economic requirements for such a development, within the village itself.</p>	<p>enterprises. This more gradual approach has the advantage that there is a smaller impact upon the local village sustainability and protects the Green Belt.</p>
<p><i>Para 85</i></p>	<p>As indicated above, there is no need for further development in support of the sustainable development of Histon and Impington, which views such a project as a real threat to village sustainability. Employment opportunities in the village are minimal. Working residents of this development are most likely to commute to the greater Cambridge area, adding to the B1049 and Cambridge area traffic peak loading.</p> <p>Maintaining the Green Belt status is entirely appropriate.</p>	<p>“County sustainability” in support of commuter residents working in the new Cambridge Research Parks should bear in mind the negative impact on County transport sustainability caused by commuters travelling by car, to & from the new research parks on the opposite side of Cambridge. The Guided Bus is approximately 1.3km from this site (long walk) and the service bus is slow & full at peak times. If people have cars, they will use them to commute.</p> <p>Green Belt land to the North of Histon & Impington is predominantly good quality agricultural land of ALC grade 2. Climate Change will make food production on such land increasingly critical to the country’s sustainability in the not too distant future.</p> <p>The straight boundary planned by SCDC will be easily made recognisable and will form the permanent Northern edge of this development. The hedgerows referred to by Bidwells, although conspicuous today, form an irregular salient and are irrelevant to the planning decision. They could be taken out by earth moving equipment in an afternoon.</p>
<p><i>Para 87</i></p>	<p>There are no local special</p>	<p>There are no special</p>

	circumstances recognised. Development in the Green Belt in Histon and Impington will be harmful and not outweighed by any benefits.	circumstances.
Para 88	There are no potential benefits that will outweigh harm to the Green Belt.	There are no potential benefits that will outweigh harm to the Green Belt.

- 3.2. It is clear from the table above that there are no exceptional circumstances to remove land from the Green Belt.
- 3.3. In addition it is clear that there is nothing to be gained from 25 dwellings on site H/1:d that improves the sustainability on the local plan. Indeed quite the contrary it will just bring further pressure on an overstretched infrastructure.

4. 2012 Inner Green Belt Study

- 4.1. We are limited in our technical ability to comment in detail on the 2012 Inner Green Belt Study. We do however offer some general comments and observation
- 4.2. We recognize that the Councils have a difficult task in balancing the need to protect the Green Belt with the responsibility to promote sustainable development and the pressure it is under to meet the level of need identified in the SHMA.
- 4.3. We believe the issue is that they were in a situation where they were looking to identify land in the Green Belt that was 'developable' because of the alleged shortfall in other land. As stated before, we believe that there is other land that could be used, negating the need to release land from the Green Belt.
- 4.4. One of the major findings from the 2012 Inner Green Belt Study was that a significant number of areas within the Cambridge Green Belt continue to be of high importance regarding preserving the historic setting and ensuring that the City remains compact. The Councils therefore attempted to establish if there were any areas in the Green Belt that were of 'lesser value'.
- 4.5. The NPPF does not distinguish between Green Belt land that is of higher or lower value. It would have made more sense to assess all land against sustainability factors and if it happened to be in the Green Belt, to then use the NPPF criteria and consider whether it's removal from the Green Belt and subsequent development would be more harmful than beneficial for that particular situation.
- 4.6. Some of the results in the Inner Green Belt Assessment Tables are surprising and warrant further investigation. Whilst recognizing that judgments have to be made, those judgments must be logical and supported by solid evidence. We question why in addition to a criteria that judges the land's importance to the Green Belt there needs to be a further criteria that asks about the impact of development on the land and why the results of these are different. For example, land has been judged as being 'very high' in terms of importance to the Green

Belt but 'high' in terms of significance of development on the Green Belt. We find the judgement for sector 11 particularly puzzling as the judgements range from medium to very high and yet they are neighbouring areas, with almost exactly the same physical features.

4.7. The 2012 Inner Green Belt Study does not provide any justification for changing the Green Belt boundaries in the villages and the Landscape Design Associates Green Belt Study (2002) was used in the SHLAA. It seems quite bizarre that the Green Belt boundary for our village setting was judged against criteria that are almost entirely related to the Inner Cambridge Green Belt.

5. The Inner Green Belt Review did not cover Histon and Impington and we are not qualified to answer this question.

6. 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?

6.1. The Council's interpretation of how paragraph 80 of the NPPF relates to the Cambridge Green Belt seems to omit the last bullet point namely, 'to assist in urban regeneration, by encouraging the recycling or derelict and other urban land'.

6.2. We would like to comment on how Green Belt in the villages was assessed. SCDC appear to have derived their own cut down view of the Green Belt Purpose Statements in para 80 of the NPPF, based on 'The Landscape Design Associates Green Belt Study' (2002) and the 'Inner Green Belt Boundary Study' (2012).

6.3. The appraisal summaries for land proposals within the Green Belt in Histon & Impington have identical entries, with Green Belt purpose statements stated as:

...Maintains and enhances the quality of Cambridge's setting.

...Prevents coalescence between settlements and with Cambridge.

Function with regard to the special character of Cambridge and it's setting:

...The distribution, physical separation, setting, scale and character of Green Belt villages.

...A landscape which retains a strong rural character.

6.4. However, no specifics for the site are entered under these, instead the following text is added, referring only to the Landscape Design Associates Green Belt Study 2002, as follows:

"Site falls within an area where development would have some adverse impact on GB purposes and functions. The Landscape Design Associates Green Belt Study (2002) describes it as an area from which distinct views of the city are scarce or absent. The function of this landscape is providing a backdrop to views of the city, and providing a setting for approaches to connective, supportive and distinctive areas of townscape and landscape

(page 62). Outer Rural Areas play a lesser role in contributing to the distinctiveness of Cambridge and its setting, and are less finite. They may also have the potential to accommodate change and development that does not cause adverse effects on the setting and special character. (page 66)”

- 6.5. It should be noted that this report clearly states that its scope is to consider a single NPPF purpose statement: **“To preserve the setting and special character of historic towns.”**

Page 62 makes a general statement concerning ALL outer rural areas of the green belt, purely in connection with the setting and special character of Cambridge.

Outer Rural Areas of the Green Belt

These are areas of landscape from which distinct views of the city are scarce or absent. The function of this landscape is in providing a backdrop to views of the city, and in providing a setting for approaches to connective, supportive and distinctive areas of townscape and landscape.

- 6.6. The page 66 quote is incomplete and conveniently omits the last few words:

“Outer Rural Areas play a lesser role in contributing to the distinctiveness of Cambridge and its setting, and are less finite as land that plays this role continues to an undefined extent beyond the Green Belt boundary. Outer Rural Areas might also have the potential to accommodate change (and development) that does not adversely affect the setting and special character of Cambridge, subject to clarification by more detailed assessment.”

- 6.7. This results in neutral Green Belt scores in the first round of appraisals, which disregard a great deal of the NPPF view on protection of Green belt land. More recently, official government statements have made it very clear that the entire scope of NPPF section 9 should be applied when assessing existing Green Belt land.

Appendix 1

Brownfield Development

- 1.1 It is incumbent from the NPPF and other policy documents to ensure that as much development as possible is carried out on brownfield site rather than using Green Belt land.
- 1.2 SCDC and CCC have entered into a useful memorandum of understanding that allows them to collaborate on housing need and share site to achieve a combined target.
- 1.3 To this end HAIVAG do not consider that sufficient attention has been paid to further brownfield sites within CCC that could be utilised to offset some of SCDC's quota without the use of Green Belt.
- 1.4 HAIVAG have analysed the information taken from Annexe 15 of CCC's Draft SHLAA dated May 2013, which shows sites that were rejected by CCC.
- 1.5 The table below shows the main reasons for sites being rejected for residential development.

Reason for Rejection	Nr. Of Sites Rejected	Comment
Ownership Issues	18	Owners unwilling to sell or multiple ownership considerations. Some sites are suitable for residential development.
Open Space/Green Belt Issues	66	Not brownfield sites
Employment/ Economic	44	Reserved for ELR or major economic impact
Identified as windfall	16	Accepted as suitable for residential but set aside for windfall purposes
Practical reasons	35	Rejected for reasons such as lack of access, overlooking etc.
Total Site Rejected	178	

- 1.6 For those sites identified as windfall the combined area totals some 3.94 hectares. If these sites have been identified as windfall they should be included in the Local Plan. 3.94 hectares would provide a good stock of houses. The sites in question are sites 430, 855, 870, 894, 12, 57, 755, 890, 151, 902, 204, 892, 917, 70, 918, 196.
- 1.7 There are 18 sites which have been rejected for ownership issues such as owners not willing to sell or due to the complexities of multiple ownership. HAIVAG question whether this is a reason for not including them in the Local Plan. Surely these sites can be included in the plan and it is then up to the developers to decide if they want to try and purchase the land from the current owners. There are sites listed as being suitable for residential development. These are:

Site Nr.	Site Name
46	West's Garage 217 Newmarket Road
54	9-12 Gerard Close
889	Cambridge Technopark Newmarket Road
126	Land to the rear of 268 Queen Edith's Way
39	Land Adjacent to and behind 195 High Street, East Chesterton
379	Petrol Station and garage Queen Elizabeth Way
236	Vindis Garage Milton Road
64	5-15 Tenison Road and Land adjacent
543	Workshops 72a Ainsworth St
21	158 Shelford Road
22	Bishops Court Trumpington

1.8 35 sites have been rejected due to practical reasons. Again it would be for the developers to make the appropriate arrangements to develop the site and overcome the practical difficulties. The following sites appear capable of being developed for residential purposes.

Site Nr.	Site Name
201	Beadle Industrial Estate
454	Garages and trees south of Barnwell Drive
393	Car park south of department of zoology field station
672	Land R/O next to Generation Sports centre
676	Various warehouses at Church End Cherry Hinton
742	Open space behind 66-80 Colville Road
854	Railway sidings west of Rustat Road
484	Car park at Thirkill Court

648	Territorial Army Centre car park
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- 1.9 Within the SCDC boundary there are some brownfield sites which would also be suitable for residential but have been rejected by SCDC for reasons that are unclear. This includes the Old Tomato Farm site at Oakington.
- 1.10 It is apparent from the above that there are robust alternative options to using Green Belt land for development and particularly so in the Histon and Impington area.