



Cambridge City and South Cambridgeshire Local Plan Examinations Matters and Issues Statement

Representor **Commercial Estates Group**
CCLP ID **5423**
SCDC ID **17653**
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Date **27 March 2015**

Matter 9 Areas of Major Change/Major Development Areas on the Edge of Cambridge (Tuesday 28 April – Thursday 30 April 2015)

1.0 **Matter 9A**

1.1 CEG's original representations included a general comment on Cambridge City Local Plan Proposed Submission Draft Policy 13 which is not the subject of a specific Matter 9A question. We maintain that, in relation to principle (g), density should be established by site-specific assessment and with regard to design and layout considerations to maximise the development potential of sites. This approach would be consistent with national policy and promote the delivery of sustainable development and we trust this representation will be addressed when site specific proposals are considered.

2.0 **Matter 9B: 1. Cambridge East**

i. As the land which has been safeguarded as a long term strategic reserve, as shown on the Policies Maps, is the subject of an adopted Area Action Plan, are there any overriding circumstances to justify its reinstatement to Green Belt land having regard to paragraph 85 (4th bullet point) of the National Planning Policy Framework?

2.1 There are no overriding circumstances to justify the reinstatement of the Cambridge East site to Green Belt land. It is however clear that there is no certainty the land will be deliverable or developable over the plan period. Consideration of the adopted AAP (2008) (RD-AD-280) can only lead to the conclusion that it is already out of date and not compliant with current and emerging policy in a number of important respects. It cannot therefore form a sound basis for the development at Cambridge East or the release of

safeguarded land, even after its review, and the AAP as a whole should be superseded on adoption of the Plans. The only sound and NPPF compliant approach is to identify this land with a safeguarded land designation which provides for the possibility of its development beyond the plan period following future Local Plan reviews without references to the AAP.

- 2.2 CEG does not object to the safeguarding of the Cambridge East site as a long term strategic reserve site. It should however be recognised that the site is not (and has no foreseeable prospect of being) available for development. This position, which was set out in our original representation, has been confirmed by recent local press reports. Following the announcement of the closure of RAF Mildenhall, Marshall of Cambridge has recently confirmed that the company is committed to the operation of Cambridge Airport¹.
- 2.3 This land cannot therefore reasonably be regarded as deliverable or developable during the plan period, and the Proposed Submission Draft Local Plans must be examined on this basis, including when considering whether there are reserve sites to make up any shortfall in housing land supply.
- 2.4 When considering the approach taken in the Proposed Submission Draft Local Plans to this site, it is important to examine the wider Green Belt purposes and principles for review set out in the NPPF (paras 79 – 86) within which the fourth bullet of paragraph 85 sits.
- 2.5 Specifically, paragraph 84 states that '*When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development*'. There is no evidence that this land will make any contribution to promoting sustainable development over the plan period, and the AAP does not provide the necessary policy framework to secure sustainable development.
- 2.6 It is essential that sufficient sites are identified to ensure the Plans are capable of meeting objectively assessed needs in full, and in accordance with their own development sequence.
- 2.7 This recent release, which is not now to provide a significant development opportunity within the plan period, should not prevent the release of further sites from the Cambridge Green Belt where proportionate evidence demonstrates such releases could promote sustainable patterns of development. The supporting text should recognise this.
- 2.8 The previous decision to release of the Cambridge East site from the Cambridge Green Belt (and maintain it in the emerging Plan as safeguarded land) recognises the benefits for promoting sustainable patterns of

¹ Cambridge News (16 January 2015) *Cambridge Airport going nowhere despite RAF Mildenhall closure, says Marshalls chief Christopher Walkinshaw* <http://www.cambridge-news.co.uk/Cambridge-Airport-going-despite-RAF-Mildenhall/story-25874940-detail/story.html#ixzz3VD8D7MuM>

development offered by sites on the edge of the City where the quantum of development necessary to secure a new sustainable community can be accommodated.

- 2.9 The deficiencies in the Councils' Inner Green Belt Boundary Study methodology and its application were presented in detail during Matter 6 discussions (and in the associated Statement of Common Ground (RD-SCG-100)). Confirmation of the future release of the Cambridge East site for development should be based on the findings of a robust assessment of the contribution that the land makes to the Green Belt utilising an appropriate methodology. Any future review of the Green Belt undertaken at the time of release should also assess other alternative opportunities and consider appropriate policy provisions to ensure that a comprehensive development which includes necessary local services, facilities and infrastructure can be delivered. In relation to the role of the Cambridge East AAP in particular, CEG does not agree that a review of the AAP alone is sufficient to confirm the release of this safeguarded land for development, and reference to an AAP review as a mechanism to confirm release is not consistent with NPPF para 85 (3rd and 4th bullets). The AAP, adopted in 2008, pre-dates the latest national policy and guidance. The AAP reflects the policy position at a particular point in time, but any future development should be based on site specific standards and compliance with policy requirements which are established in the context of the relevant up-to-date policy position, such as current housing standards and adopted green belt purposes for example.
- 2.10 The future release of the safeguarded land should be conditional only on a review of the Local Plans as a whole, to ensure that the wider objectives of national policy and guidance to promote sustainable patterns of development which are in place at the time of release are met, and that Cambridge East is the most appropriate location. For example, it is reasonably foreseeable that the provision of new infrastructure will alter transport connections and opportunities to strengthen sustainable travel patterns, or the emergence of new employment locations and clusters on the edge of the City will change the green belt locations which should be released, consistent with NPPF Paragraph 84, to promote sustainable patterns of development.