



TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

SUMMARY PROOF

of Stephen Connell BA (Hons), Dip TP, MRTPI

**on behalf of South Cambridgeshire District
Council**

**Appeal by Axis Land Partnership
Land between Haverill Road & Winton Way
Stapleford**

- 1.0 The proposed development is not in accordance with the development plan and material considerations indicate that planning permission should be refused. In accordance with s38(6) of the Planning and Compulsory Purchase Act 2004, the appeal should therefore be refused.
- 1.1 The Council's first reason for refusal indicates that the proposed development would be inappropriate development in the Green Belt and would therefore by definition be harmful to the Green Belt.
- 1.2 There is no dispute between the parties that the Appeal Proposal constitutes inappropriate development and is contrary to Policy S/4 of the South Cambridgeshire Local Plan 2018 and the Framework.
- 1.3 In addition to definitional harm I consider there to be a significant degree of harm to the openness of the Green Belt by reason of the dense urban form proposed, such that the Appeal Proposals would detract from the open and rural character and appearance of its setting and do so visibly. The Appeal Proposals would also conflict with purposes of the Green Belt, because the development would result in urban sprawl, and would not safeguard the countryside from encroachment.
- 1.4 The result is that in addition the proposals are contrary to Policy NH/8 of the South Cambridgeshire Local Plan, and the Framework.

- 1.5 Furthermore, it has been established that the Appeal Proposals would cause less than substantial harm to the relevant heritage assets, and I consider this harm attracts great weight against the Appeal Proposals, even though taken by itself, I accept that it is outweighed by the public benefits.
- 1.6 In addition to the above, I rely on Ms Dinah Foley-Norman's proof in relation to the landscape and visual effects of the proposals. Her findings should be considered as further harm to this Green Belt area, which attracts substantial weight.
- 1.7 Paragraph 148 of the Framework confirms that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 1.8 I have assessed the various material considerations that have been put forward by the Appellants as amounting to very special circumstances. Although there is not a great deal of disagreement as to the weight to be afforded to each of the matters identified, I consider the benefits do not clearly outweigh the harm to the Green Belt and the other harm that arises here. There are thus specific policies in the Local Plan and within the Framework that indicate that this Appeal Proposal should be refused, and that is the outcome I contend for here.