

**WRITTEN STATEMENT FOR MATTER 6A**

**GREEN BELT - GENERAL ISSUES**

**SOUTH BARTON ROAD LAND OWNERS GROUP**

**SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL ID. 21301**

**LOCAL PLAN EXAMINATIONS**

**CAMBRIDGE CITY AND SOUTH CAMBRIDGESHIRE**

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## CONTENTS

<b>1. INTRODUCTION .....</b>	<b>1</b>
<b>2. MATTER 6A – GREEN BELT GENERAL ISSUES .....</b>	<b>2</b>



## 1. INTRODUCTION

- 1.1 This Statement has been prepared by Januarys on behalf of the South Barton Road Land Owners Group (South BRLOG) to the Local Plan Examinations for Cambridge City and South Cambridgeshire. South BRLOG comprises four landowners, as follows: Corpus Christi College, King’s College, Queens’ College, and Selwyn College. The four landowners are like-minded organisations that take a long term approach to development and retain an interest in the ownership and management of their sites. The landowners want Cambridge to continue to be a successful place. South BRLOG owns land to the South of Barton Road which is on the south western built-up edge of Cambridge. It is currently located within the Green Belt. The site is wholly within the administrative boundary of South Cambridgeshire District Council. In October 2013 representations were submitted on behalf of South BRLOG to draft South Cambridgeshire Local Plan (Draft SCLP).
- 1.2 The South BRLOG representations to Draft SCLP were supported by the following technical documents: Ecological Appraisal; Initial Landscape & Visual Appraisal; Response to review of the Inner Green Belt Boundary Study; Transport Submission; Flood Risk Assessment; Initial Archaeological Overview; and Housing Requirements Study. Where relevant we will refer to the findings of these previous studies and our original representations.
- 1.3 We have separately promoted land to the North of Barton Road through draft Cambridge Local Plan (Draft CLP2014) and Draft SCLP for the North Barton Road Land Owners Group (North BRLOG).
- 1.4 We are aware that there is agreement between the landowners of three potential development sites on the western edge of Cambridge between Madingley Road, Barton Road and the M11; University of Cambridge, St John’s College, and North BRLOG. The landowners agree that a co-ordinated development could be delivered in the area to the north of Barton Road. If the land in the area to the north of Barton Road is released from the Green Belt and allocated for development in Draft CLP2014 and Draft SCLP, it would be appropriate to identify Land to the South of Barton Road as ‘safeguarded land’ to meet future development needs beyond the plan period.
- 1.5 In our previous representations to Draft CLP2014 and Draft SCLP we requested the following changes to the Green Belt policy:

*We request that a comprehensive review of the Green Belt boundary should be undertaken based on meeting full development needs. We request that Land to the South of Barton Road is identified as safeguarded land to meet longer term development needs beyond the plan period.*

## 2. MATTER 6A – GREEN BELT GENERAL ISSUES

- 2.1 We commented on the Green Belt in Section 8 of our Representations Reports to Draft SCLP. We commented on Policy S/4 (Cambridge Green Belt) in Paragraphs 9.11 to 9.17 of our South Cambridgeshire Representations Report. In summary, we conclude that exceptional circumstances do exist to justify the release of land from the Green Belt, which relate to the need for housing and affordable housing; those matters were discussed in Matters 2 and 3. The Councils also accept that exceptional circumstances exist, as confirmed in Paragraph 2.54 of Draft CLP2014 and Paragraph 2.32 of Draft SCLP which relate to the need for jobs and homes. The limited amount of land proposed for release from the Green Belt is insufficient to meet that need.
- 2.2 The Green Belt has been inappropriately treated as a factor which overrides all other sustainability considerations. The development strategy has therefore been driven by a single issue at the expense of other key planning considerations.
- 2.3 We request that a comprehensive review of the Green Belt boundary is undertaken to meet objectively assessed development needs. Land should be released from the Green Belt in sustainable locations on the edge of Cambridge to meet development needs to 2031, and safeguarded land should be released to meet longer term development needs. We also request that Land to the South of Barton Road should be released from the Green Belt and identified as safeguarded land.
- 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?**
- 2.4 The issue of housing need was dealt with in Matter 3. At Paragraph 2.32 of Draft SCLP the Councils already acknowledge that exceptional circumstances exist to justify the release of land from the Green Belt. We agree, although we consider that the housing need is far higher than identified by the Councils. It is the housing market signals discussed in Matter 3 e.g. high house prices and land values and problems of housing affordability, which represent the exceptional circumstances to justify the release of land from the Green Belt. The impact on in-commuting and the failure to meet the jobs target required to deliver the employment strategy represent additional exceptional circumstances that justify the release of land from the Green Belt. The demand for housing in Cambridge and South Cambridgeshire will continue into the future and beyond the plan period. If housing need in Cambridge and South Cambridgeshire does not represent exceptional circumstances, then it is not clear whether anything would justify the release of land from the Green Belt.
- 2.5 Paragraph 83 of the NPPF and Paragraphs 044 and 045 of the NPPG do indicate that the Green Belt should be a restraint to development. However, Paragraph 83 of the NPPF makes it clear that the plan-making process is where decisions about whether land should

be released from the Green Belt should be made, and Paragraph 84 requires sustainable development considerations to be taken into account when considering Green Belt matters. The Green Belt should not be treated as the most important factor in determining the development strategy, which over-rides all other sustainability matters. The Green Belt should also not be treated as a near absolute constraint, when in fact it is a planning policy tool which can and should be varied to meet development needs.

2.6 It is likely that some participants at the Examinations will claim that the consequences of not releasing land from the Green Belt would be positive because Cambridge would remain a 'compact city'. In our opinion, Cambridge would continue to be a 'compact city' even if additional land in the south western edge of the City was released from the Green Belt and identified as safeguarded land. The M11 would continue to form the physical western edge of the urban area and future residents of 'safeguarded land' at land South of Barton Road would be able to easily walk and cycle to the City Centre and also to jobs, services and facilities located elsewhere in the City.

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).**

2.7 The 2012 Inner Green Belt Boundary Study is the Council's evidence base upon which it has decided whether there are areas of land on the edge of Cambridge which could be released from the Green Belt and allocated for development '*without significant harm to Green Belt purposes*'. Paragraph 80 of the NPPF identifies the five purposes of the Green Belt. The 2012 Inner Green Belt Study only considers the setting of historic towns (4th bp) and merging of neighbouring towns (2nd bp) purposes, and incorrectly includes landscape character within the assessment process (which is not one of the purposes of the Green Belt). The partial consideration given to the five national purposes of including land within Green Belt has resulted in a significant bias against areas close to the city centre, in favour of sites on the periphery, where potential problems of encroachment into the countryside and urban sprawl have apparently not been considered. We conclude that the Inner Green Belt Study does not represent a robust or credible evidence base to justify the limited boundary changes proposed.

2.8 There has been no consideration or assessment of options for the release of land from the Green Belt for 'safeguarded land'. The consideration of potential options for 'safeguarded land' was not part of the 2012 Inner Green Belt Study.

2.9 We request that a comprehensive and robust, finer grained review of the Green Belt boundary is undertaken which seeks to meet objectively assessed development needs.

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.**

- 2.10 Paragraph 84 of the NPPF expects the Green Belt boundaries to take account of the need to promote sustainable patterns of development, and the consequences for sustainable development of those boundaries. Paragraph 85 deals with the process of defining Green Belt boundaries. One of the relevant criteria (1st bp) in defining boundaries is the consistency with the development strategy for meeting identified requirements for sustainable development; the designation of the Green Belt cannot be separated from meeting development needs.
- 2.11 The Green Belt has been incorrectly treated as a near absolute constraint, when in fact it is a planning policy tool which can and should be varied to meet development needs provided that can be achieved without undermining the purpose of the wider Cambridge Green Belt. The failure to properly consider a comprehensive review of the Green Belt to meet development needs has resulted in the decision to direct development away from Cambridge towards new settlements.
- 2.12 The delivery of sustainable development and meeting objectively assessed housing needs were addressed respectively in Matter 2 and Matter 3. The development strategy proposed in Draft SCLP does not seek to correctly identify or meet objectively assessed housing needs. There is an over-reliance on new settlements, where the evidence indicates that delivery will be delayed and the levels of affordable housing provided would not meet policy requirements. There would be an increase in congestion on the main routes into and out of Cambridge because people are more likely to travel by car for longer journeys to work. It is only by allocating sites on the edge of Cambridge which are likely to succeed in changing travel behaviour and encouraging the use of public transport and cycling for journeys to work. A more sustainable strategy would be to direct development to sites on the edge of Cambridge which could be easily connected to the existing bus, cycle and footpath networks.
- 2.13 The Green Belt boundary that results from the development strategy proposed in Draft SCLP has no degree of permanence to it and would not endure beyond the plan period. There will be other development needs beyond 2031, and those needs must be acknowledged when defining the Green Belt boundary. A proper assessment of 'safeguarded land' has not been undertaken and none of the Green Belt studies have considered this matter.
- 2.14 It is inevitable that further land will need to be released from the Cambridge Green Belt in the next plan period i.e. after 2031, and therefore land should be identified in Draft SCLP as 'safeguarded land' to meet those long term development needs.
- 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.**



2.15 The five purposes of the Green Belt are set out in Paragraph 80 of the NPPF and restated in Paragraph 2.29 of Draft SCLP. The purposes of the Green Belt 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.

2.16 The Councils identify only three purposes for the Cambridge Green Belt, which are:

- preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
- maintain and enhance the quality of its setting; and
- prevent communities in the environs of Cambridge from merging into one another and with the city.

2.17 The first and fifth national purpose of the Green Belt is not fully reflected in Draft SCLP, and was not properly considered in the 2012 Inner Green Belt Study. We request that a comprehensive and robust, finer grained review of the Green Belt is undertaken which takes into account all of the national Green Belt purposes.

**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?**

2.18 It appears that no assessment has been undertaken in Draft SCLP of the potential opportunities to enhance the beneficial use of the Green Belt. The development of land released from the Green Belt typically includes landscape enhancement measures and green infrastructure, including open space, sport and recreation and access to the wider countryside. Those measures and improved facilities are usually provided by the associated development. The decisions about whether to release land from the Cambridge Green Belt and if so where, were focussed on the impact of development on the purposes of the Green Belt. The opportunities for any beneficial use of the Green Belt was not a factor in the decision making process.