

Independent Examinations Cambridge City
and South Cambridgeshire Local Plan- Matter
6A

Great Shelford Ten Acres Ltd 8948 (6032)

Matter 6A- Green Belt General Issues

i. Does the level of need for new jobs and homes (paragraph 2.54 of the 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 the Planning Practice Guidance)?

Bearing in mind the Framework's indication that development in the Green Belt should be resisted, what would the consequences if the boundary of the GB were to be retained in its current location?

- 1.1 Yes- the level of need for new jobs and homes required in South Cambridgeshire arises as a result of the Cambridge economy, which is of national significance. As such, this constitutes the exceptional circumstances to warrant the release of sites from the Green Belt to meet the future needs.
- 1.2 The role and influence of Cambridge extends beyond the administrative boundaries of Cambridge City and South Cambridgeshire. The local economy, in particular research and design, is nationally significant, a matter recognised in the opening to the Local Plan (para 1.3) and the Greater Cambridge City Deal. The economy in South Cambridgeshire is projected to deliver some 22,000 new jobs over the plan period. The growth aspirations of the area are recognised within the City Deal, which seeks to invest in the infrastructure, housing and skills to facilitate the continued growth of *the Cambridge phenomenon* [RD/STRAT/300].
- 1.3 As such, planning for and delivering new jobs and homes is not simply a matter of local aspiration but one of national importance in securing on-going sustainable economic growth nationally. The City Deal seeks to highlight the national and local support for sustainable growth in Greater Cambridge, including rural affordable homes. The nationally important role of Greater Cambridge provides the exceptional circumstances necessary to justify the removal of sites from the Green Belt.
- 1.4 The Cambridge Green Belt is drawn tightly around the City. Both Local Plans identify that the most sustainable location for growth is the edge of Cambridge, followed by new Settlements and then in the rural area at Rural Centres and Minor Rural Centres. Great Shelford (Ten Acres) support this hierarchy in principle and agree that it represents the most sustainable pattern of development for the Greater Cambridge Area. However, as noted under our previous representations, there are a number of concerns in respect of how this policy has been expressed.
- 1.5 A number of the most sustainable villages within South Cambridgeshire, including Great Shelford, are within the Cambridgeshire Green Belt. These villages often possess a wide range of facilities including education, healthcare and excellent public transport links to the city. Some of these villages contain sites which do not contribute to the overall purposes of the Green Belt (as set out within the Framework) and could make a significant contribution to meeting the growth needs of the area as set out within the strategy. As such, we believe there is a role for the rural area to achieve a balance across the settlement hierarchy to avoid the over reliance on new settlements.
- 1.6 Great Shelford (Ten Acres) observe that, in order to ensure that the level of need for new jobs and homes can be accommodated in a sustainable manner, as set out within the preferred spatial hierarchy, Green Belt release will be necessary. The alternative to the spatial strategy is a reversion back to the 'dispersal' to out-lying villages and towns beyond the outer boundary of the Green Belt with people commuting back to jobs in and around Cambridge contributing toward congestion, greenhouse gas emissions, and other quality of life issues. Great Shelford (Ten Acres) do not consider that the dispersal policy would meet the requirements of the Framework when taken as a whole.
- 1.7 In addition to environmental and social issues, it is important to note the consequences of under delivery. In our previous representations to Matter 3 (including Appendix 1), we highlighted that

homes in the City and South Cambridgeshire were becoming increasingly unaffordable as a result of a constrained market. If sites in, and around Cambridge, and in the most sustainable rural villages are not released for development the needs of South Cambridgeshire and Cambridge will not be met, with development being pushed further from the City, thus undermining the planned strategy.

- 1.8 Overall, we believe the continued economic success of the area, which includes housing in sustainable locations to support the growth in jobs, is of national significance and warrants the release of sites from the Green Belt.

ii. Does the 2012 Inner Green Belt Study provide a robust justification for the proposed boundary changes? If not why not.

- 1.9 Great Shelford (Ten Acres) consider that the Inner Green Belt Study [RD/Strat/210] fails to provide a robust justification for the proposed boundary changes beyond the immediate edge of Cambridge- i.e. those sites being released within the rural area of South Cambridgeshire. The study fails to comprehensively assess the Cambridge Green Belt, which extends 3-5 miles from Cambridge, and the role that the villages play in the setting and preservation of the character of Cambridge. As such, the 2012 Inner Green Belt Study does not provide the robust justification for the proposed boundary changes in the rural area, as set out in Policy H/1.
- 1.10 The 2012 study is the only joint Green Belt review undertaken to underpin the release of sites in and around the City edge. As noted, the settlement hierarchy focuses development on the City Edge followed by new settlements and Rural Service Centres/ Minor Rural Service Centres. Given that a number of the most sustainable villages are within the wider Green Belt, this study is not considered robust in supporting Green Belt release.
- 1.11 The study area is *confined to land on the edge of Cambridge and within any major physical barriers around Cambridge such as the M11 motorway to the west of the City and the A14 to the north. On this basis, land around the necklace villages has not been included within the study area except where a site abuts the boundary with Cambridge or is very close to it*" [RD/Strat/2010]. It states that *any* removal of land from the Green Belt beyond these barriers would be inconsistent with the Green Belt purposes of preserving Cambridge as a compact City, preventing coalescence between Cambridge and necklace villages and maintaining the quality and setting of Cambridge. However, it is noted that Policy H/1 includes additional Green Belt release, for example in the village of Comberton, which is at odds with the stated objectives and scope of the study.
- 1.12 It is noted that the 2012 study is intended to be read alongside the earlier assessment carried out in 2002. This study does not look in detail at individual parcels of land around the Rural Service Centres/ Minor Rural Service Centres, which fall within the Green Belt. As such, no comparative assessment has been undertaken between the more sustainable rural settlements and the Green Belt purposes around the necklace villages. As such, the 2012 study does not provide the robust justification for the boundary changes being proposed through Policy H/1.

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.

- 1.13 Great Shelford (Ten Acres) note the emphasis in paragraph 84 of the Framework which requires local planning authorities to take account of the need to promote sustainable patterns of development. Our representations to Policy S/6 set out our general 'in principle' support for the development hierarchy as contained within the South Cambridgeshire Local Plan, albeit with significant

reservations in respect of how the plan expresses this hierarchy through the proposed distribution of development and allocations.

- 1.14 However, Great Shelford (Ten Acres) do not believe that the Inner Green Belt Review has fully considered the consequences for sustainable development of changing development towards the villages inset within the Green Belt, particularly where these settlements could be sequentially preferable to less sustainable locations further from the City.
- 1.15 As highlighted, the Inner Green Belt review makes no assessment of the necklace villages, such as Great Shelford, which is identified as a 'Rural Centre'. As stated in our representations in respect of the Sustainability Appraisal, we highlighted that the reasoning given for not allocating the site in Great Shelford is that '*development would have some adverse impact on Green Belt purposes and functions*'. However, no such conclusion was reached in earlier Green Belt Studies which form part of the current evidence base, such as the 1998 Green Belt Landscape Stetting Study or the later 2002 review. In the case of the former, the study concluded that the site was in an area where development would have a low impact on the setting of Cambridge City, and the 2002 study considered a 'negligible' impact. Great Shelford (Ten Acres) therefore question where a robust comparative assessment has been taken out to meet the requirements of paragraph 84 in terms of properly assessing the consequences of channelling development inside the Green Belt.
- 1.16 Furthermore, it is not considered that the Local Planning Strategy has been followed when identifying Green Belt release sites under policy H/1 (as per Paragraph 85). Great Shelford (Ten Acres) observe that policy H/1 allocates homes in Comberton (Minor Rural Service Centre) on a Green Belt Site, without first assessing opportunities within Great Shelford (Rural Service Centre) which is preferable in terms of Policy S/2. As set out in our representations to Policy H/1, the site at Great Shelford is surrounded by development and is no longer 'open' in a visual sense. As such, in redefining the boundary, the Inner Green Belt Review, by virtue of its close geographical scope, fails to properly consider sites in Rural Centres that are unnecessary to keep open and could form sustainable development opportunities.
- 1.17 We note that no 'safeguarded' sites have been included within the Local Plan. Given the persistent under-delivery within the district and our reservations in respect of the ability of the strategy to deliver, there is no certainty that the Green Belt boundaries will not need to be reviewed in the shorter term, and that boundaries will not need to be altered at the end of the development plan period, with safeguarded land identified to '*stretch well beyond the plan period*'. Great Shelford (Ten Acres) therefore question what would happen in the event of a delay to delivery of new settlements in South Cambridgeshire and how any shortfall would be met.
- 1.18 As noted, the Inner Green Belt review does not cover the entirety of the Green Belt, rather focuses on the city edge. As such, it is not considered that a robust assessment has been made of the Green Belt Boundaries has been made to support the alterations required by policy H/1, and adequately justify the allocation of sites at lower-order centres.

iv. Are the purposes of the Cambridge Green Belt, set out at paragraph 2.50 (Table 2.4) of the CCC LP and paragraph 2.29 of the SCDC LP, consistent with paragraph 80 of the Framework?

- 1.19 The purposes of the Cambridge Green Belt are consistent with Paragraph 80 of the Framework.

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.

- 1.20 No Comment.

Conclusions:

- 1.21 The plan is presently unsound as there is no evidence to clearly support the proposed Green Belt releases in the rural area, when compared to other Green Belt sites, particularly those in higher order settlements. The plan is therefore not justified as it is not based on robust evidence.
- 1.22 The plan is inconsistent with National Policy as it fails to identify additional land to be safeguarded for release from the Green Belt to provide additional housing to meet the needs of the district as set out in our previous representations to policy S/5 (Matter 3). In the event that there is under delivery, or the housing target is increased, there is a need to release land in the most sustainable rural settlements, such as Rural Centres. Those surrounded by Green Belt must have a suitable mechanism for release within policy S/4 to ensure that land can be brought forward which accords with the Development Strategy.
- 1.23 The plan must identify additional land for release under policy H/1, with further land safeguarded as Reserve Sites in and around more sustainable settlements such as the Rural Centres in the event of a housing shortfall to ensure that growth accords with the over-arching strategy of the plan. This would seek to support the general development strategy and ensure that the plan is 'sound'.
- 1.24 As noted in our representation to Policy S/4, additional wording should be included as follows:

"Land at xx, shown on the Policies Map, is safeguarded for development. Development on safeguarded land will only be supported following a review of the local plan which proposes the development or if:

It can be shown that there is an under delivery of housing following an annual review of the Housing Land Supply to maintain a 5 year supply or

It is required to meet an identified local housing need where market housing is required to make a site viable under Policy H/10."

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