

CAMBRIDGE CITY & SOUTH CAMBRIDGESHIRE LOCAL PLAN EXAMINATIONS

MATTER 6A: Green Belt – General Issues

1. This Hearing Statement has been prepared by Boyer Planning pursuant to the duly-made representations submitted on behalf of RLW Estates Ltd and the Defence Infrastructure Organisation (DIO).

i. Does the level of need for new jobs and homes.....constitute the exceptional circumstances necessary to justify the proposed removal of sites from the Green Belt..... 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. The historic core and compact urban form of Cambridge are characteristics which successive planning strategies have sought to protect. The established Green Belt plays a crucial role in securing this objective. Para 2.29 of the City Local Plan provides a succinct synopsis of the adverse consequences of any further major Green Belt release on the edge of the city.
3. National policy (NPPF paras 83 and 85 etc) emphasises the key characteristics of Green Belts for plan-making purposes: boundaries should be established with a view to permanence, capable of enduring beyond the Plan period; only in exceptional circumstances should boundaries be adjusted in Local Plan reviews.
4. On 6th October 2014 the Government introduced amended guidance as part of the Planning Practice Guidance with the specific objective of reinforcing the importance of Green Belt protection. This includes the statement that Green Belt should be treated as a constraint '*which may restrain the ability of an authority to meet its need*', and re-iterating the guidance in para 83 of the NPPF that once Green Belt boundaries have been established they should only be altered in exceptional circumstances¹.
5. The 2003 Structure Plan and related Green Belt Review provided for the release of a number of large sites from the Green Belt around the edge of the city. The consequent development

¹ ID: 3-044-20141006 and ID: 3-045-20141006

projects are now well advanced. In accordance with national policy there is as a result a prima facie presumption against any further Green Belt releases in these Local Plans consistent with the intention to achieve permanence (NPPF para 83).

6. The Local Plans propose a number of small-scale releases of land from the Green Belt to meet both housing and employment purposes. Apart from the village sites, and excluding existing commitments, it is understood that the releases on the inner Green Belt boundary² represent a capacity of 530 dwellings (430 in Cambridge City and 100 in South Cambs) and 10.6 ha of employment (3.7 ha in Cambridge City and 6.9 ha in South Cambs).
7. Additional capacity, over and above that provided for in the Local Plans (and in particular in South Cambs), is available on non-Green Belt land in sustainable locations. The SHLAA provides evidence of this. Specifically however we highlight the Waterbeach New Town site in this context. The South Cambs Local Plan currently assumes that Waterbeach will deliver housing from 2026, although Policy S/12 acknowledges the potential for earlier release through a review of the Local Plan. The constraint upon delivery at present is a policy imposed one. In their representation in response to this policy, RLW/DIO seek an amendment to facilitate housing completions from 2021, with a trajectory which increases total completions in the plan period from 1,400 to 3,500. Events since the representations were submitted suggest that there is potential to accelerate delivery further. This is a matter which will be explored at a later session of the Examination when Waterbeach New Town is considered in detail.
8. The capacity and ability to deliver more housing in the plan period than currently proposed in the Local Plan plainly undermines any claim that exceptional circumstances exist to justify a further review of Green Belt boundaries to meet housing requirements.
9. Similarly, as regards employment, the expectation of the South Cambs Local Plan is that the Waterbeach new town will contribute to meeting the needs of the Cambridge area³. Whilst the Local Plan understandably does not specify a precise extent of that potential, as this is a matter for the subsequent stages of the planning process, the intention of the Local Plan is that the New Town can provide for additional employment. In addition, the proximity of Waterbeach New Town to key employment locations to the north of Cambridge (for example the Science Park and Cambridge Research Park) means there is greater potential to support further employment growth in these existing concentrations of employment. Again, this is indicative of an absence of exceptional circumstances for Green Belt release based on need.
10. If the required exceptional circumstances to justify the release of these sites cannot be demonstrated by reference to 'need', there would have to be some other site specific justification. This matter is addressed in response to the next question.

² Illustrated on Key Diagrams in both Local Plans

³ Para 3.34

11. As regards the consequences of retaining the current Green Belt boundary, overall it can be concluded that this will be positive: development needs will still be met in sustainable locations and the character and setting of Cambridge will be preserved.

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

12. The general approach of the Study, in terms of sub-dividing land around the inner Green Belt boundary into sectors for examination on a focused basis, is clearly appropriate. Although in some cases the study examines only broad areas, in respect of the Green Belt releases proposed for the first time in these Local Plans, the sites in question have been assessed individually and consequently enable a specific critique.

13. The starting response to the Inspector's question is not a comparative one (related to differences over scores and weighting) but rather whether there is any land which does not serve Green Belt purposes and consequently should not as a matter of principle be included in the Green Belt in any event. This might come about because of anomalies in past boundary definition or recent land use changes affecting a site or its surroundings. Such might be claimed for the release proposed at NIAB 3.

14. In respect of the other sites proposed for release in the two Local Plans, the Study finds that they do serve Green Belt purposes, with scores in response to 'Significance of development on Green Belt' being 'Medium'. This is not the highest measure of impact but it is a degree of conflict with national policy nonetheless.

15. It should be noted that the sites proposed for release in the City Local Plan (Policy 26 - north and south of Worts' Causeway and on Fulbourn Road West) were rejected for release as recently as 2006 by the City Local Plan Inspector on the grounds of their importance to the setting of the city. They were classified as having a medium to very high sensitivity in this regard.

16. The release of small Green Belt sites arising from anomalies, or indeed villages sites where a locally-generated 'exceptional need' argument can be presented, need not be inconsistent with the spatial strategy of the Plans, if adequately justified in terms of national policy guidance. At present however we do not consider that the evidence supports this in relation to the inner boundary releases.

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.

17. The purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development has three dimensions (economic, social and environmental) and these must be considered together as they are mutually dependent⁴. Para 84 of the NPPF clearly requires local authorities to keep these considerations in mind when reviewing Green Belt boundaries. However, neither this, nor the second sentence in the paragraph (which requires consideration to be given to the consequences of directing development to non-Green Belt locations), can override para 83 which requires exceptional circumstances to be identified before making any changes, in the interests of the intended permanence of the Green Belt.
18. It is plainly conceivable that *if* the only alternative to the release of Green Belt land would involve directing significant quantities of development to genuinely unsustainable locations, perhaps remote from services and employment and generating unwelcome car-based travel demand, or on land subject to significant overriding environmental constraints⁵, then this could conflict with para 84. It is clearly not the case here however. There are opportunities to meet development needs on land beyond the Green Belt but still well-related to Cambridge, as provided for in the spatial strategy.
19. It is not necessarily the case that sites within the Green Belt at the edge of Cambridge urban area are more sustainable in terms of travel patterns. To illustrate this we refer specifically to the Waterbeach proposal. In terms of its locational attributes, the site lies just 5 km north of the existing urban edge of Cambridge. A number of existing strategic employment sites are located on this northern edge including the Science Park and the proposals in the Local Plan for Cambridge Northern Fringe East (CNFE). This distance and the flat topography lends itself to cycling. The Cambridge Research Park is even closer, on the west side of the A10 at Waterbeach itself. There are also existing cycle routes, bus services from Waterbeach (service 9 and 196) and a railway station with regular services between Cambridge and Ely.
20. The benefits of the location are evidenced by the 2011 Census data. For example, data for Waterbeach Ward (mostly Waterbeach village) working population shows that 40% currently travel to work using sustainable modes (walk, cycle bus or rail). This compares to 25% for South Cambridgeshire as a whole and, for instance, 33% for Fulbourn - an edge of Cambridge Ward

⁴ NPPF paras 6 - 8

⁵ E.g. see Footnote 9 of the NPPF (re para 14)

adjoining the Green Belt. It also bears favourable comparison with Cambridge city where the proportion for the entire administrative area is 62%.⁶

21. The new town site also offers the potential for enhanced bus and rail based public transport to the city centre and Science Park/CNFE area, with cycle additionally viable, especially to the latter. Anticipated journey times (with the new Chesterton Sidings station in place) are: *City centre*: 9 minutes by train, 24 minutes by bus; *Science Park area*: 5 minutes by rail, 5-10 minutes by bus, 15 minutes by cycle. With these locational attributes there can be no question but that this represents a highly sustainable form of development. It is also relevant that the proposed development would greatly enhance connectivity within the north of Cambridge generally which will have wider sustainable development benefits. Transport and access are considerations will be addressed further in response to Matter 7A (Strategic Transport Issues) and will be detailed, as appropriate, in future hearing statements regarding Waterbeach New Town.
22. In addition, other important sustainable development factors need to be taken into account, such as making effective use of land. By way of example, Waterbeach would bring an extensive area of previously developed land back into use, consistent with NPPF Core Planning Principle 8 (paragraph 17).
23. Turning to the durability of the Green Belt boundary, one of the features of the South Cambs Local Plan is that it makes provision for on-going development at three of its strategic sites beyond the end of the plan period. These comprise the Northstowe Reserve, Bourn and Waterbeach. The quantum of development beyond 2031 provided by these sites is significant, in excess of 10,000 dwellings, and equivalent to a third of the total housing provision in both Local Plans over the entire current plan period.
24. Moreover, once the South Cambs Local Plan is adopted this represents a guaranteed forward provision as it relates to the continuation of projects which will be well underway by 2031. Equally, it is essential that the current Local Plan commits to the post-2031 capacity in order to enable comprehensive and integrated land use, infrastructure and delivery strategies to be established.
25. On the basis of plan adoption in 2015, sixteen years from the end of the plan period, this must represent a satisfactory and proportionate response to the requirement in para 85 of the NPPF regarding the durability of the Green Belt boundary.

⁶ ONS Census 2011

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.

26. The expressed purposes of the Cambridge Green Belt are well-established and understood. Table 2.4 of the City Local Plan provides a useful cross-reference between these and the five defined purposes in para 80 of the NPPF. There is a clear correlation between the two, with three of the national purposes directly relevant:

- check unrestricted sprawl
- prevent coalescence
- preserve the setting and special character of an historic town.

27. Moreover, the proposed strategy will indirectly support the remaining two purposes: assisting in safeguarding the countryside by directing development to land beyond the Green Belt but close and easily accessible to the city; and encouraging regeneration by directing Cambridge-focused development to available sites with the city.

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?

28. No comment.

***Boyer Planning for RLW Estates
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