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Lands Improvement Holdings Ltd and Pigeon Land Ltd

Planning Report

25 January 2016



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EXECUTIVE SUMMARY

- The inspectors letter, dated 20 May 2015, sets out key concerns in relation to the overall development strategy, the Green Belt Study, the SA/SEA and the objectively assessed housing need in the submission Local Plans.
- The councils commissioned additional work in response to these concerns although the briefs issued to consultants restricted the scope of that work.
- We consider that the proposed modifications, the SA Addendum Report and the additional technical work do not address the concerns raised by the inspectors.
- As such, the Local Plans are still not sound since they are not justified, have not been positively prepared, they will not be effective and they do not comply with national policy.
- The Local Plans, as proposed to be modified, are still not sound for the following reasons:
 - under-estimation of the level of objectively assessed housing need in both Cambridge and South Cambridgeshire;
 - unrealistic deliverability of Waterbeach and Bourn, both in respect of the timescales, the level of infrastructure required and the potential funding gap;
 - 2012 Green Belt Study now appears to have been 'abandoned', rather than corrected and explained;
 - the new 2015 LDA Green Belt Study is not robust and has inconsistencies in terms of scoring, subdivision of sites and double counting thus adding to the lack of clarity and confusion on the matter;
 - lack of clarity on the sustainability balance that forms the basis of the Local Plans (including weight given to green belt considerations when compared to sustainability considerations);
 - lack of clarity and consistency in the comparison of reasonable alternatives to the preferred options;
 - inconsistencies and disparities between the assessment of new settlements when compared to the assessment of urban fringes sites;
 - no consideration in the SA Addendum Report of the likely significant impact that the increase in travel by car as a result of the dispersal development strategy and the under-estimation of housing need which will not support the required level of jobs growth in the draft Local Plans could have on climate change;
 - insufficient employment land has been allocated to meet the specific needs of the bio-medical and healthcare based R&D sector close to CBC and Addenbrooke's Hospital.



1 INTRODUCTION

- 1.1 This planning report has been prepared on behalf of Lands Improvement Holdings Ltd and Pigeon Land Ltd in response to the Proposed Modifications to the draft Local Plans, the SA Addendum Report and the additional background technical work carried out in 2015 following the inspectors letter dated 20 May 2015 setting out preliminary findings and expressing concerns about the soundness of the submission Local Plans.
- 1.2 Lands Improvement Holdings Ltd and Pigeon Land Ltd have land interests at Cambridge South, located south of Addenbrooke's Road, east of Hauxton Road and west of Shelford Road. The proposals comprise:
- approximately 45 hectares (85,000sqm) of office/research and employment development (science park);
 - around 1,250 market, affordable and key worker dwellings;
 - neighbourhood shops and community facilities;
 - new primary school;
 - public open space;
 - strategic landscaping;
 - country park;
 - highways and other supporting infrastructure.
- 1.3 The site is available and deliverable within the early part of the plan period since the required infrastructure can be provided quickly without the need for City Deal funding.
- 1.4 This report supports comments made on a number of specific Proposed Modifications and also comments on various sections of the SA Addendum Report.
- 1.5 The inspectors advised in 2014 that employment land delivery will be considered during a separate session at the examination and re-confirmed this late last year and we have, therefore, sought to minimize the number of comments made about this matter in the representations. A copy of the 2014 letter is attached in Appendix 1.
- 1.6 The Proposed Modifications indicate that comments should only be made on the Proposed Modifications and the SA Addendum Report and while we have sought to adhere to this, in order to fully consider the comments made by the inspectors in their 20 May 2015 letter, we have had to comment on the additional background technical work that has been carried out, particularly where no changes are being proposed. For example, we have commented on the Peter Brett Report in respect of the objectively assessed housing need for Cambridge City even though there is no change proposed in the level of housing need.



2 OBJECTIVELY ASSESSED HOUSING NEED AND HOUSING DELIVERY

2.1 Objectively Assessed Housing Need

2.1.1 The 20 May 2015 inspectors letter outlined the following key findings about the objectively assessed housing need in the submission Local Plans:

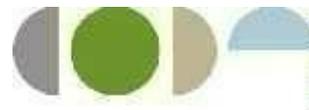
- “The SHMA methodology for assessing the need for housing is not entirely consistent with Planning Practice Guidance”;
- “The SHMA Assessment is at the lower end of the likely range of possible levels of need [for housing] to 2031”;
- “We are concerned, in particular, that the councils’ approach to the establishment of the full objectively assessed need has not fully taken into account the advice in the Planning Practice Guidance regarding market signals, particularly in relation to affordability”;
- “There is no evidence before us that the councils have carried out the kind of assessment of market signals referred to in the Guidance, or considered whether an upward adjustment to planned housing numbers would be appropriate”;
- “There should be clear evidence that the councils have fully considered the implications and likely outcomes of an upward revision in housing numbers on the provision of affordable housing”.

2.1.2 The inspectors also asked the councils to consider the implications of the 2012 based Household Projections.

2.1.3 It is clear from the inspectors’ preliminary conclusions that the 2013 Cambridgeshire Strategic Housing Market Assessment (SHMA) did not follow a PPG compliant approach to draw conclusions on objectively assessed need. It is equally clear that the inspectors considered that housing need had been under-estimated in the submission Local Plans.

2.1.4 In response to the key findings from the inspectors, the councils instructed Peter Brett Associates (PBA) to prepare further evidence on objectively assessed housing need. Based upon this additional evidence, the objectively assessed housing figure for Cambridge City is proposed to remain at 14,000 dwellings over the plan period and the objectively assessed housing figure for South Cambridgeshire is proposed to increase by 500 to 19,500 dwellings.

2.1.5 GL Hearn has prepared a separate report in response to the additional work carried out by PBA and as part of this has undertaken updated modelling, based upon the 2012 demographic forecasts. This report has been submitted with the representations. In summary, we consider that the PBA evidence **under-estimates the full objectively assessed housing need** in Cambridge and South Cambridgeshire for the following reasons.



- 2.1.6 **The demographic projections should be adjusted because they assume that household formation amongst younger households is suppressed.** In line with Paragraph 15 of PPG, the household projections for both Cambridge and South Cambridgeshire should, therefore, be adjusted to address issues associated with suppressed household formation.
- 2.1.7 **Economic growth expectations are not addressed in the PBA evidence, as required in the PPG and in Paragraph 158 of the NPPF.** This results in a mis-alignment of housing and employment, meaning that the labour supply will not be able to support the expected job growth. Job growth will, therefore, need to be met in effect from increasing long distance commuting from outside South Cambridgeshire, which is not a sustainable strategy. We have estimated that there will be a net increase in commuting from outside Cambridge and South Cambridgeshire of 14,900 workers, so one in three jobs will need to be supported by long distance commuting.
- 2.1.8 **Significant key market signals, land values and past under delivery of housing, have not been assessed in the PBA evidence.** Evidence suggests a severe shortage of residential land in and around Cambridge but PBA have not sought to increase the rates of housing delivery to take account of this. As such, there has been an under-estimation of the objectively assessed housing need.
- 2.1.9 It is important to note that this under-estimation will result in the lowest level of housing provision in Cambridge and South Cambridgeshire for over 10 years. By way of comparison, the current level of housing need in Cambridge and South Cambridgeshire is 21% lower than the level in the East of England Plan (2008) and 12% lower than the level in the adopted Cambridgeshire and Peterborough Structure Plan (2003) and yet housing affordability is worse now than previously. The under-estimation of housing need cannot be regarded as consistent with the NPPF or viewed as a positive response which will improve affordability.
- 2.1.10 **No adjustment has been made in the PBA evidence to take account of the level of affordable housing need and the past under-delivery of this type of housing in Cambridge and South Cambridgeshire.** The PBA report is dismissive of the case to increase the level of housing delivery to improve delivery of affordable housing, despite specific reference in the 20 May 2015 inspectors' letter that an upward adjustment to housing need is warranted based upon the affordable housing evidence.
- 2.1.11 In summary, we do not consider that the objectively assessed housing figures of 14,000 and 19,500 in the draft local plans, as proposed to be modified, address the comments made by the inspectors in their 20 May 2015 letter. The plans are not, therefore, considered to be sound because they are not justified, they have not been positively prepared and are not compliant with planning policy.
- 2.1.12 GL Hearn has remodeled the objectively assessed housing need based upon the 2012 demographic projections and in doing so has also taken into account the considerations above. **Based upon GL Hearn's research, the full objectively assessed housing need for Cambridge is 15,200 dwellings and for South Cambridgeshire is 27,000 dwellings for the plan period 2011 to 2031.**



2.1.13 In order to make the Local Plans sound in respect of objectively assessed housing needs, the housing requirement should be increased to reflect the full objectively assessed housing need resulting in a figure of 15,200 in Cambridge and 27,000 in South Cambridgeshire. It is considered that such an increase would address the concerns raised by the inspectors in the 20 May 2015 letter.

2.2 **Housing Delivery**

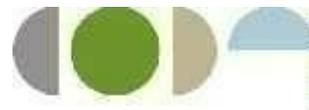
2.2.1 We have previously objected to the unrealistic timing and housing delivery rates within the South Cambridgeshire housing trajectory for the new settlements at Waterbeach and Northstowe and also objected to the lack of sustainability of development at Bourn. The councils are now proposing to bring forward the timing of Bourn and Waterbeach and lower the housing delivery rates associated with all three new settlements.

2.2.2 We indicated in our objections to the submission Local Plans that Bourn should be deleted as an allocation since it is not considered to be a sustainable location, and our position has not changed on this in respect of the Proposed Modifications. The size of the settlement at 3,500 dwellings will not be sustainable and residents will need to travel to access employment as well as higher order services and facilities. Travel will be Cambridge centric and the level of commuting by car will significantly increase, despite the proposed infrastructure improvements, resulting in more congestion and an increase in the level of carbon emissions. It is acknowledged in the CSRSM modelling report (Figure 5-13) that Bourn, and Waterbeach, will only have a public transport modal share of around 6 to 7% despite the significant investment in infrastructure.

2.2.3 **We do not consider that Bourn is a sustainable location for new development.**

2.2.4 **We do not consider that seeking to bring forward the delivery of Waterbeach from 2026 to 2022 is realistic** given the amount of required infrastructure, both public transport and highway improvements including the A14, the processes and timescales that will be needed to acquire third party land for the associated infrastructure work and the funding gap for this infrastructure, which was previously discussed at the examination but still remains despite the 2015 updated background technical reports.

2.2.5 We do not consider that the Local Plans are positively prepared, justified or effective since unrealistic assumptions have been made about an earlier start date at Waterbeach and at Bourn. We have previously indicated in our objections to the submission Local Plan that Bourn should be deleted as an allocation since it is not considered to be a sustainable location and our position has not changed on this.



3 GREEN BELT

- 3.1 The key finding relating to the Inner Green Belt Boundary Study prepared by the councils in 2012 set out in the inspectors' letter was:
- "We have found it difficult, in some cases, to understand how the assessment of importance to the green belt has been derived from the underlying assessments of importance to setting, character and separation. For example, sector 8.1 is given a score of high with regard to importance to setting and medium with regard to importance to both character and separation, but the importance to green belt is then scored very high."
- 3.2 In response to this, the councils commissioned LDA to carry out a new assessment of the green belt and also advised that the methodology in their own 2012 Study was being reviewed during a meeting that we had with them to discuss employment land on 2 September 2015. While the 2015 LDA Inner Green Belt Boundary Study now forms part of the background technical evidence base, it is unclear how work on the 2012 Study, which forms the basis of the draft Local Plans, has progressed since we are unable to find any further reference or update to the document.
- 3.3 The LDA report, while agreeing with the majority of the conclusions in the councils' 2012 Study in respect of the importance of land to green belt purposes, recommends that consideration be given to the release of certain areas of land in the south and the south east of the city since it concludes that limited development could take place without significant harm to the purposes of the green belt. Based upon this recommendation, South Cambridgeshire are now proposing a provisional allocation for employment use on land to the south of CBC.
- 3.4 We acknowledge that the councils have commissioned a new report to assess the importance of the green belt, but do not understand why the original **2012 Study appears to have been 'abandoned' and the inspectors difficulties in understanding the methodology left unanswered**. The inspectors will be aware that we have previously submitted evidence to show that when using a fine grain approach to the assessment of the green belt using the councils' methodology in the 2012 Study, the Cambridge South site could be delivered to avoid areas of high and very high importance to the green belt.
- 3.5 We have prepared a separate report setting out detailed concerns about the 2015 Inner Green Belt Boundary Study and this is attached at Appendix 2. In summary, the following key comments are made.
- 3.6 **The identification and size of parcels of land is not consistent throughout the 2015 LDA Study.** For example, land to the south of Addenbrooke's is clearly subdivided a number of times according to specific characteristics on site which has then allowed a small parcel of the land to come forward as a provisional allocation to extend CBC. However, sites such as Cambridge South have not been subdivided in the same way and indeed the LDA methodology explains that sites have not been divided



up. However, this does not explain why land south of Addenbrooke's was assessed in a different way to allow small parcels of land to be identified for allocation for development.

- 3.7 **The 2015 LDA Study states in its methodology that it does not employ a scoring system to assess land. However, we would disagree with this** since land is divided according to the role and function of the green belt and is placed into categories based upon its contribution to the distinctiveness of Cambridge and its setting. A ranking system does, therefore, exist. This is important because the ranking system then feeds into the SA Addendum Report in the site proforma section for the edge of Cambridge sites, under the landscape and townscape criteria. This results in double counting of the green belt criterion in the SA Addendum Report for the edge of Cambridge sites. This double counting only occurs in the consideration of sites located on the edge of the city.
- 3.8 **The anomalies identified above mean that the 2015 LDA Study does not identify all land, including Cambridge South, that could be released without undue detriment to the purpose of the green belt.**
- 3.9 Furthermore, some of the **assessments and conclusions drawn in the LDA 2015 Study are not consistent with those set out in the Inner Green Belt Boundary Review carried out by LDA in 2002** for South Cambridgeshire District Council. For example, the 2002 LDA Study states that there is potential to develop parts of the 'areas east and south of Trumpington' without causing significant detriment to green belt purposes. Cambridge South lies to the south of Trumpington but has been dismissed in the 2015 LDA Study. In contrast, the 2002 LDA Study did not identify opportunities for development south of Addenbrooke's but the 2015 LDA Study suggests that land to the south of Addenbrooke's could be developed without undue harm to the green belt. While it is accepted that the 2002 and the 2015 Studies have been prepared for different local plan reviews, there is no explanation in terms of green belt purposes as to why one area of land (east and south of Trumpington) has increased in importance while the other (south of Addenbrooke's) has reduced.
- 3.10 We, therefore, consider that the 2015 LDA Study is flawed and does not provide a sound basis for the draft Local Plans. It has not addressed the inspectors comments in the 20 May 2015 letter which seek to understand the methodology associated with the councils' 2012 Green Belt Study and has simply introduced a new green belt assessment which has further inconsistencies and anomalies.

4 OVERALL DEVELOPMENT STRATEGY

4.1 The 20 May 2015 inspectors' letter said:

- 'The assertion that 55% of the housing requirements of both councils from 2011 to 2031 will take place in the urban area or the edge of Cambridge can only be demonstrated by including commitments carried forward from previous Plans'.
- 'A situation where almost half of new allocations are at the third tier of the sequence does not appear to support the contention that the Plans accord with the SDSR'.



- 'We are concerned that an apparent inconsistency between the SDSR (Sustainable Development Strategy Review) and the Plans reliance on meeting development needs in new settlements may lead to a finding of unsoundness'.

- 4.2 In seeking to address these concerns, the councils have carried out additional background technical work and on the basis of this have prepared an updated strategy approach table and housing provision table to 2031 as part of the Proposed Modifications to the Local Plans.
- 4.3 However, while slightly more land on the edge of Cambridge at Cambridge East (north of Cherry Hinton and north of Newmarket Road) is proposed to come forward for housing, the development strategy and the **percentage of development proposed in the second tier of sites in the settlement hierarchy (the edge of Cambridge) continues to be reliant on commitments carried forward from previous local plans**, including North West Cambridge, Glebe Farm, Clay Farm, NIAB and Trumpington Meadows.
- 4.4 In addition, **provision continues to be made for approximately 50% of the housing requirement to be met in the less sustainable third and fourth tiers of the settlement hierarchy** representing new settlements and the rural area. It is acknowledged that the level of provision in new settlements has reduced from 31% to 23% but there has been a corresponding near doubling of housing provision in the rural area.
- 4.5 While the councils have provided more information in response to the inspectors comments, none of it addresses the concerns raised about the reliance on the third tier of the sequence, which is less sustainable, to accommodate a significant proportion of the housing requirement. Now the Proposed Modifications transfer this **reliance onto the third and fourth tiers of the sequence**, again both of which are less sustainable than the edge of Cambridge.

5 SUSTAINABILITY APPRAISAL

- 5.1 The 20 May 2015 inspectors' letter said:

- 'We have found it difficult to understand how the various dimensions of sustainable development were assessed in accordance with the requirements of paragraph 85 of the NPPF.'
- 'It might be expected that such an exercise would be carried out through the SEA/SA process. However, large releases of green belt land to meet development needs were rejected at an early stage in the process of sustainability appraisal. No further consideration was given to a number of proposals for development on the urban edge on the grounds that these could not be considered as reasonable alternatives. Bearing in mind the conclusions of the SDSR (Sustainable Development Strategy Review) and the apparent shortcomings of the Green Belt Review we have significant concerns regarding the robustness of the SEA/SA process.'



· 'The SEA/SA process is not a wholly mechanistic one, as much depends on the weight to be given to the various dimensions of sustainability.'

- 5.2 In response to these comments, the councils commissioned additional background technical work which then fed into an SA Addendum Report. The SA Addendum Report sets out in more detail the way in which reasonable alternatives, particularly sites on the urban fringe of Cambridge, have been assessed.
- 5.3 More detailed comments on the SA Addendum Report are set out in Appendix 3 and Addendum 4. The comments are summarised below.
- 5.4 There are **inconsistencies and inaccuracies in the assessment of reasonable alternatives** when compared to the assessment of new settlements which results in a biased advantage for the new settlement options. This does not comply with paragraphs 84 and 165 of the NPPF.
- 5.5 The SA Addendum Report does not take into account the potential impacts on the green belt of major transport infrastructure required to support the proposed new settlements whereas the weighting of green belt considerations attached to the impact of development on the edge of Cambridge sites has ruled out development in these more sustainable locations. The SA Addendum Report acknowledges that there will be significant negative landscape impacts and potential negative impacts on the green belt arising from the new settlements, particularly at Waterbeach. However, Bourn and Waterbeach score a 'green' in the green belt category of the SA Addendum Report.
- 5.6 The **evidence base for assessing the reasonable alternative site options on the edge of Cambridge is based upon the councils' 2012 Green Belt Study and the 2015 LDA Green Belt Study. We consider that these studies are not robust** and they should not, therefore, form the basis for the assessment of reasonable alternative site options.
- 5.7 **The SA Addendum Report does not take account of the likely significant effect on climate change of the increase in travel by car** which will result from the dispersal development strategy to locate housing in new settlements and the need for workers to travel from long distances, beyond South Cambridgeshire, in order to support the level of jobs growth proposed in the Local Plans.
- 5.8 It is **unclear how the components of sustainability have been weighted in the SA Addendum Report when compared to green belt considerations**. It is acknowledged by the councils, in the Development Strategy Update, that edge of Cambridge sites have advantages in terms of accessibility to jobs and services in the urban area but the process whereby the weighting attached to the green belt overrides the weighting attached to sustainable development criteria remains unclear.
- 5.9 **The additional transport modelling that has been carried out to assess edge of urban sites has been based upon groups of sites with no explanation about why certain sites were included within particular groups**. For example, the Cambridge South site assessment has been based upon cumulative transport modelling of a group of sites, one of which included land to the east of Cambridge. It is unclear how the transport effects of the Cambridge South site can be reasonably assessed when

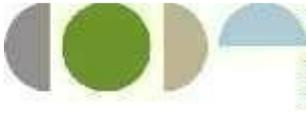


other sites, one of which is not even in close proximity to Cambridge South, have been taken into account.

- 5.10 More specifically, there are **inconsistencies when looking at the assessment of individual urban fringe sites** such as Cambridge South. For example, under the transport category for cycle routes the Cambridge South site scores 'amber' despite the fact that the proposed development would connect to the current cycle and walking provision along Addenbrooke's Road and would also provide enhanced crossing facilities on Addenbrooke's Road ensuring strong walking and cycling connections to Addenbrooke's Hospital, Cambridge Biomedical Campus (CBC), Trumpington Park & Ride and Cambridge city centre.
- 5.11 We have prepared an updated assessment for the Cambridge South site to rectify these inconsistencies which forms part of Appendix 3. When compared to the assessment carried out for the provisional extension to CBC, the Cambridge South site has less red scores (one less), less amber scores (six less) and more light and dark green scores (seven more). In summary, Cambridge South scores better in the following areas; human health and well being, transport and ecology.

6 PROVISIONAL ALLOCATION OF LAND FOR CBC EXTENSION

- 6.1 We have previously submitted evidence in response to the Submission Local Plans on the need for the allocation of more employment land located in close proximity to Addenbrooke's and CBC to accommodate specific bio-medical and healthcare life sciences based R&D employment uses. We do not intend to repeat or add to the employment evidence in great detail at this stage because the inspector has confirmed that a separate session on employment land delivery will be held when the examination re-opens.
- 6.2 We note that as part of the Proposed Modifications, land south of CBC is provisionally allocated for employment use and while Proposed Modification PM/SC/8/A references the fact that "the council considers that the need for jobs can comprise exceptional circumstances justifying a review of the Green Belt" it continues that "there is no overall shortage of employment land within South Cambridgeshire..". We are, therefore, unable to find any evidence to explain the exceptional circumstances justifying the release of this land from the Green Belt.
- 6.3 In addition, Proposed Modification PM/SC/8/A states that local plan policy should not prevent development of the land "if it proves to be deliverable" and that "further investigation will be required to examine whether there is development potential on the site". We, therefore, look forward to reviewing the results of the council's further consideration of the delivery and sustainability of the provisional modification site.
- 6.4 We would, however, like to reiterate that we consider the **councils' employment evidence base in respect of medical R&D employment use, some of which was undertaken in 2010, is outdated**. We have provided a graph and a drawing in Appendix 5 to demonstrate that there is now only 3.2



hectares of land left on CBC up to 2031 for life sciences businesses and R&D needing to locate close to Addenbrooke's. When using the past take up rate, this equates to only **1.04 years of land left at CBC for the whole plan period**. We do not, therefore, consider that the provisional allocation of land to the south of CBC under proposed policy E/1B is sufficient.

- 6.5 The draft Local Plans are not, therefore, sound since they are not justified and have not been positively prepared in respect of employment land to meet the needs of the bio-medical and health care life sciences based R&D businesses. The Local Plans could be made sound through the allocation of additional land, such as Cambridge South, for R&D employment uses needing to locate in close proximity to Addenbrooke's and CBC.

7 CONCLUSIONS

- 7.1 The inspectors' letter dated 20 May 2015, sets out key concerns in relation to the overall development strategy, the Green Belt Study, the SA/SEA and the objectively assessed housing need in the submission Local Plans. The councils commissioned additional work in response to these concerns, although the briefs issued to consultants were restricted in scope.
- 7.2 We consider that the Proposed Modifications, the SA Addendum Report and the additional technical work do not address the concerns raised by the inspectors.
- 7.3 At this stage it is important that the green belt methodology and the approach to the SA is robust because the urban fringe (green belt) sites were dismissed too early when the submission Local Plans were being prepared. In order to be robust, we consider that there should be a comparison between the weighting of the green belt value and the weighting of sustainability criteria for all reasonable alternatives. We do not consider that this is in the current evidence base, SA Addendum Report or Proposed Modifications and on this basis there has still not been a detailed assessment of all reasonable alternatives. The 2015 LDA Green Belt Report is not adequately robust to measure the value of reasonable alternatives and the SA Addendum Report is still too limited to assess the sustainability credentials of reasonable alternatives. We do not, therefore, consider that the situation has moved further forward since the examination and the inspectors' letter despite the additional work carried out by the councils.
- 7.4 As such, the Local Plans are still not sound since they are not justified, have not been positively prepared, they will not be effective and they do not comply with national policy.
- 7.5 The Local Plans, as proposed to be modified, are still not sound for the following reasons:
- under-estimation of the level of objectively assessed housing need in both Cambridge and South Cambridgeshire;
 - unrealistic deliverability of Waterbeach and Bourn, both in respect of the timescales, the level of infrastructure required and the potential funding gap;



- 2012 Green Belt Study now appears to have been 'abandoned';
- the new 2015 LDA Green Belt Study is not robust and has inconsistencies in terms of scoring, subdivision of sites and double counting thus adding to the lack of clarity on the matter;
- lack of clarity on the sustainability balance that forms the basis of the Local Plans (including weighting given to Green Belt considerations when compared to sustainability considerations);
- inconsistencies and disparities between the assessment of new settlements when compared to the assessment of urban fringes sites;
- no consideration in the SA Addendum Report of the likely significant impact that the increase in travel by car as a result of the dispersal development strategy and the under-estimation of housing need which will not support the required level of jobs growth in the draft Local Plans could have on climate change;
- insufficient employment land has been allocated to meet the specific needs of the bio-medical and health care based R&D sector close to Addenbrooke's Hospital.

7.6 The draft Local Plans could be made sound if the following changes were to be made:

- increase in the level of objectively assessed housing need to reflect the full need; provision of 15,200 dwellings in Cambridge and 27,000 in South Cambridgeshire;
- adjustment to housing trajectory to show realistic delivery timescales for Waterbeach;
- Green Belt Study and SA Addendum Report to be revisited to ensure that a consistent approach is adopted for the consideration of all reasonable alternative urban edge sites;
- balance between weighting given to sustainability and weighting given to the protection of the green belt to be reviewed in order to deliver a sustainable development strategy in accordance with the most sustainable option set out in the council's Housing Strategy Update;
- a proper assessment undertaken of employment land requirements, supply and delivery for the specific employment sector of bio-medical, healthcare and life sciences requiring a location in close proximity to CBC and Addenbrooke's Hospital; and
- allocation of more land, such as Cambridge South, for medical based R&D employment use close to CBC and Addenbrooke's Hospital.



Appendix 1



LOCAL PLAN EXAMINATIONS CAMBRIDGE CITY and SOUTH CAMBRIDGESHIRE

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Our Ref: 5102/20801

Your Ref: 007-001

1 December 2014

M Carpenter
Director
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Dear Mike

Further Strategic Matters: Employment Land Delivery

I refer to your letter of 24 November 2014.

The Inspector has confirmed that a session to consider the Cambridge Northern Fringe East will be included in Block 3 of the Examinations. This will be in a revised programme in the near future.

A session to consider Employment Land Delivery will be arranged in due course, later in the Examination process.

Please do not hesitate to contact me if there are any further queries.

Yours sincerely,

Gloria Alexander

Gloria Alexander
Programme Officer



Appendix 2



Objection to proposed
modifications relating to
Green Belt issues
CAMBRIDGE SOUTH

January 2016

Objection to proposed modifications relating to Green Belt issues

Introduction

1.1 The Councils have no objection in principle to the release of Green Belt. The Councils have individually and jointly undertaken reviews of the inner Green Belt boundary (Reference Table 1) and concluded that a small number of sites could be released to meet employment and housing needs. In addition, following the serious concerns raised by the Inspectors, they have also commissioned an independent review undertaken by LDA Design.

1.2 These studies were undertaken to provide an evidence base to help the Councils reach a view on whether there are specific areas of land that could be considered for release from the Green Belt and allocated for development to meet identified needs, without significant harm to Green Belt purposes (Reference Table 1).

1.3 The Cambridge and South Cambridgeshire Sustainable Development Strategy Review (SDSR) (RD/Strat/040) is clear that locating development on the urban edge has significant advantages in sustainability terms and that key considerations in assessing the suitability of specific locations will be any potential conflict with Green Belt purposes and the deliverability of infrastructure improvements for dispersed settlements.

1.4 Furthermore, the Councils note in the Development Strategy Update November 2015 paragraph 4.17 that *“The development sequence is clear that land on the edge of Cambridge is the second most sustainable location for development in the Greater Cambridge area after development in the existing urban area, and additional development in these areas would require a Green Belt review”*.

1.5 It is therefore of utmost importance that any assessment of the inner Green Belt boundary is not only robust but comprehensive in identifying all sites which could be considered as reasonable alternatives so they can be properly balanced against the need to promote sustainable patterns of development as required by paragraph 84 and 85 of the National Planning Policy Framework (NPPF).

The status of the 2012 Inner Green Belt Boundary Study December 2012 (RD/STRAT/210)

2.1 Pigeon and LIH in their previous representations and presentations seeking clarification from the Councils have described how 58% of the assessment results of the Inner Green Belt Boundary Review 2012 are anomalous (Appendix 1).

2.2 The Inspectors have expressed difficulties in understanding how the assessment of ‘Importance to Green Belt’ has been derived from the underlying assessments (letter of 20th May, 2015 RD/GEN/170).

2.3 The 2012 Inner Green Belt Boundary Study continues to be offered as part of the evidence base even though the anomalies identified remain uncorrected. This is concerning as the correction of this document would result in the identification of sites which have lower 'Importance to Green Belt' than is currently documented and an increase in the sites which satisfy the Councils' criteria that a score of *"medium/low/negligible indicated that any change to the Green Belt boundary would have limited an(sic) effect on Green Belt purposes"* and therefore, clearly, should be considered as reasonable site options.

2.4 In response to the Inspectors' serious concerns the Councils have instructed an independent consultancy to undertake a review the Green Belt. This has led to a completely new Green Belt review being undertaken by LDA Design using different methodology than the Councils' Inner Green Belt Boundary Review 2012.

2.5 The Councils' 2012 Inner Green Belt Boundary Study is referred to as comparable with the LDA Design study (Reference Table 2). If the studies are comparable, the LDA Cambridge Inner Green Belt Boundary Study November 2015 is similar to a document which contains 58% anomalies. Neither the Councils, nor LDA Design, have referred to the comparison being made with a document which is based on inconsistent and anomalous information.

2.6 However, these assessments are contradictory. The six Site Options proposed in Issues and Options 2 are based on the Councils' 2012 study of the Inner Green Belt. The LDA Design document however does not recognise any of these sites as having a lesser importance (Reference paragraph 6.3.2).

2.7 The LDA Design study considers that *"notwithstanding their importance to Green Belt purposes, certain areas of landcould be developed without significant harm to Green Belt purposes, provided any development meets specified parameters"* (Paragraph 6.3.4). The Councils have based their proposal of an additional Site Option (provisional main modification PM/SC/8/A) to the south the Addenbrooke's Biomedical Campus on this, even though their own assessment of the site shows it to have a High importance and Very High significance.

2.8 The basis on which site options are selected is not clear and is contradictory. The weight attributed to the Green Belt purpose for sites which are discounted as reasonable alternatives is not clear. This is not a good evidence base to support Plans which should be genuinely sustainable and in which economic, social and environmental needs are clearly set out and balanced against clear, robust and consistent Green Belt considerations. This evidence base should be given little weight and does not comply with the requirements of Paragraphs 84 and 85 of the NPPF.

The LDA Design Cambridge Inner Green Belt Boundary Study November 2015

METHODOLOGY

3.1 There is no recognised methodology for Green Belt review. The LDA Design study is based on landscape assessment methodology to inform the first part of their study in the identification of Defining/Supporting Townscape/Landscape etc. These definitions are based on townscape/landscape role and function which do not relate directly to Green Belt purpose.

3.2 The second part identifies 16 qualities which are stated to be relevant to Green Belt purpose as set out in the table on pages 65 and 66 of the report. These qualities are applied to the Sectors and sub-areas identified. However, the size of the sectors and sub-areas are so large and broad brush, pockets of land which could be considered to be released according to the requirements of the NPPF paragraph 84 and 85 are missed.

Scoring

3.3 LDA Design claim (Paragraph 0.1.2) that their methodology does not employ a scoring system. However, the study does employ a system which describes the role and function of the Green Belt and places land into categories that describe, for example “Distinctive” and “Supportive” Townscape/Landscape (Reference 1), as contributing more or less strongly to the distinctiveness of Cambridge and its setting. This is a ranking system and therefore a quasi-scoring system. This matters because these designations are then utilised within the SA Addendum Proformas for the Edge of Cambridge sites in both the Landscape and Townscape criteria. As the designations are ‘ranked’ they denote the SA Proforma score and result in the ‘double counting’ of results for the Edge of Cambridge SA Proformas. It is also used for the SA Proforma Green Belt criterion. There is no equivalent detailed evidence base for the SA Addendum Proforma for the other reasonable site options and so at least three of the SA criteria for the Edge of Cambridge sites are not undertaken on a like for like basis with New Settlements SA Proforma criteria. This does not allow a consistent and equitable application of the relative weighting of the various dimensions of sustainability.

Size of land parcels

3.4 LIH and Pigeon have previously submitted a study using the Councils’ 2012 methodology but using a finer grain assessment which shows that there are considerable areas which the Councils have missed identifying as having lower value importance to Green Belt and which are suitable for consideration as reasonable alternative sites. This is because their original study assessed large tracts of land where the highest value in any part of the area sweeps over the whole area. The Importance to Green Belt is therefore inflated when, in reality, areas which have lesser importance have been missed.

3.5 The LDA Design report identifies 19 sectors with most sectors divided into sub-areas where the assessment of one or more of the 16 qualities identified as contributing to the importance of the Green Belt differs between one part of the sector and another (paragraph 3.2.5).

3.6 Figure 2: 'Assessment Sectors and Sub-Areas' of the LDA Design study shows the area known as Cambridge South as one area, sub area 8.1. Area 8.1 is a large area of land and equates to Areas 8.1, 8.2 and 8.4 in the Councils' 2012 Inner Green Belt Boundary Study. The latter document describes a difference in the Importance to Green Belt across 8.1, 8.2 and 8.4 as High, Low and Low respectively (corrected values derived directly from Councils' assessment of importance to setting, character and separation please see Appendix 1) so a difference of Importance to Green Belt across this area has already been identified by the Councils.

3.7 As LDA Design uses even larger areas than the Councils' assessment this means that not only is the land which the Councils show as less important to the Green Belt purpose in their 2012 study not identified, but also the smaller parcels of land which could be identified using a finer grained approach. It is predictable that a broad brush approach will identify less land of lower importance to the Green Belt and this flies in the face of undertaking a comprehensive review.

3.8 The LDA Design report says it does not sub divide the sub areas. However, sub-area 10.2 to the south of Addenbrooke's Hospital (a smaller parcel of land than 8.1) is further sub-divided, allowing the identification of a sub-parcel of land (identified as site E/1B in the Proformas) which LDA Design say could be released from Green Belt. The starting point of any release of the Green Belt should be its importance to the purpose of the Green Belt. LDA Design describe area 10.2 as a single entity within a sector which plays *"a key role in the setting of the south of Cambridge, forming the most westerly extent of the foothills of the Gog Magog Hills, which form the backdrop to all views out from and across Cambridge in this direction"* and yet reach a conclusion that with green buffers and restriction of development to relatively flat ground the sub-parcel to the north of sub-area 10.2 could be released from the Green Belt. This proposition equally applies to area 8.1 (Cambridge South). With certain parameters for Green Belt release in place, development could be undertaken in Sector 8.1 without significant harm to Green Belt purpose.

3.9 The methodology employed by LDA Design is not consistent. It does not identify all land which could be released without undue detriment to the purpose of the Green Belt. The methodology must be robust and in enough detail to identify all areas of land which have lesser importance to the Green Belt to satisfy the requirements of paragraph 84 and 85 of the NPPF. The LDA Design Study clearly does not do this.

ASSESSMENT

Gateways

3.10 LDA Design describe the urban gateway of the ongoing development at Trumpington Meadows and Glebe Farm being the urban gateway to Trumpington rather than Cambridge itself. (Reference 2).

Inconsistencies in the LDA Design 2015 study

3.11 The LDA Design Study describes how they arrive at choosing Sectors and sub-areas indicating that where there were clear changes in the characteristics these would be sub-divided (Reference 3).

3.12 Sector 8 Area 1 is a large land parcel of 190 ha which, in terms of its importance to the Green Belt, is varied across its area.

3.13 LDA Design finds Area 8.1 is sub-divided in the Townscape and Landscape Role and Function (Figure 11). Area 8.1 is divided into an area of 'Supportive townscape/landscape' and an area of 'Connective townscape/landscape'. These categories are based on the analysis of townscape and landscape role and function, which feeds into the 16 qualities with LDA Design identify as contributing to the performance of the Green Belt purposes.

3.14 LDA Design state that *"most sectors are divided into sub areas, where the assessment of one or more criteria differs between one part of the sector and another."* (Paragraph 0.6.1). The question arises as to why the LDA Design study does not further sub-divide area 8.1 into the areas they themselves recognise as different, and why the methodology employed is even coarser grained than the Councils' 2012 Study.

3.15 The approach is not consistently applied and does not allow proper consideration of all areas of land which may be suitable for Green Belt release in the light of the requirements of paragraph 84 and 85 of the NPPF.

LDA Design assessment of Sector 8, Cambridge South (Page 121 et seq)

3.16

Criterion 1: 'A large historic core relative to the size of the city as a whole'.

This states that *"significant expansion of development into this sector would increase the impression of the city sprawling outwards from its historic centre"*. Further growth in this area would appear as part of Trumpington, as there is a significant green and tree'd route between Trumpinton and the junction of Fen Causeway and Lensfield Road which is the urban gateway of Cambridge (Reference 2). The expansion of Trumpington is not a Green Belt issue.

Criterion 2: 'A City focused on the historic core'.

This states that *"retention of this sector helps to prevent the requirement for community scale centres to expand to a size that would compete with the historic core"*. Cambridge South is a proposal for high tech employment. There is no plan to create any community centre which would compete with the historic core. The LDA Design conclusion contradicts the SA Addendum Proforma criterion 'Shopping' which states that the site *"would have no effect or would support the vitality and viability of existing centres"*.

Criterion 3: 'Short and/or characteristic approaches to the historic core from the edge of the city'.

The assessment states that Sector 8 *“contributes little to the approach to the historic core”*. The urban gateway to Cambridge begins at the double roundabout of Fen Causeway with Lensfield Road. The approach would remain largely unchanged by the development of Cambridge South.

Criterion 4: ‘A city of human scale easily crossed by foot and by bicycle’.

The Inner Green Belt Boundary Study November 2015 states that *“the busy cycling and walking routes (to the centre of Cambridge) are both readily apparent and well used along Trumpington Road”*. It should also be noted that Addenbrooke’s Hospital, a major employer, is also accessible along readily accessible, apparent and well used cycle routes. The site retains the human scale and is readily accessed from the centre of Cambridge and to the major employment hub of Addenbrooke’s.

Criterion 5: ‘Topography providing a framework to Cambridge’.

The assessment states that Sector 8 has *“some undulation with Stone Hill forming a localised high point between the valleys of the River Cam and Hobson’s Brook. This sector also contains a minor valley feature to the south, with the River Cam or Granta feeding into the River Cam to the north west of the sector”*. LDA Design also refer to this whole area as ‘Level views, countryside foreground, mixed urban edge’ in Figure 9: Visual Assessment. The emerging masterplan recognises the minor undulation and rise of Stone Hill and takes this into account, proposing to retain the higher land as undeveloped land.

Criterion 6: ‘Long distance footpaths and bridleways providing access to the countryside’.

The assessment notes *“there is no formal public access into or through this sector”*.

Criterion 7: ‘Key views of Cambridge from the surrounding landscape’.

The assessment states *“there are no defined key views in the vicinity of this sector”*.

Criterion 8: ‘Significant areas of distinctive and supportive townscape and landscape’.

The assessment states that *“The majority of the sector was identified as Connective landscape in the 2002 Green Belt Study by LDA Design. However, the new development occurring at Glebe Farm is creating a strong and recognisable new area of Cambridge, supporting the distinctive character of the city. The northern part of the sector forms the setting for this new urban edge and is therefore now categorised as Supportive. The southern part of the sector is, as previously, Connective. The M11 corridor is identified as a visually detracting feature that influences the western edge of this sector”*

The definition of ‘Supportive’ and ‘Connective’ (Reference 1) is based on landscape considerations and the distinction that Glebe Farm is ‘Supportive’ as it creates a strong, recognisable new area of Cambridge is not related to the purposes of the Green Belt.

It could be strongly argued that any new, well designed development on the edge of Cambridge would attract a designation of ‘Supportive’ which apparently, according to LDA Design, precludes

development. It begs the question as to why the Addenbrooke's Biomedical Campus currently being built out has not the same 'Supportive' designation applied immediately south of the allocation.

Criterion 9: 'A soft green edge to the city'.

The assessment notes that *"the ribbon development along Cambridge/Shelford Road has a soft green edge. However the new development at Glebe Farm, on the northern edge of the sector, does not currently have a green edge and has an urbanising influence on part of this sector. However, as it matures, the significant planting that has taken place is expected to provide a soft green edge to the new development"*.

A soft green edge can be designed and mature with any development. It is a landscape consideration and does not relate to the purpose of the Green Belt.

Criterion 10: 'Good urban structure with well-designed edges to the city'.

The assessment states *"The constructed development to date at Glebe Farm has been designed to create a strong, long-term edge to Cambridge, with a distinctive gateway on Hauxton Road and a well vegetated road corridor with housing fronting on to it along Addenbrooke's Road. Housing along Cambridge/Shelford Road generally backs on to the countryside, creating a poorly finished edge of varied rear garden boundary properties"*.

The Glebe Farm development creates a strong edge with the new Addenbrookes Access Road. LDA Design states that the distinctive gateway created by the development is as a gateway to Trumpington, not to Cambridge (Reference 2). Any new development can be designed to create a strong edge. This is a landscape/townscape consideration and does not relate to the purpose of the Green Belt.

Criterion 11: 'Green corridors into the city'.

The assessment states that there are no green corridors into the city in the immediate vicinity of this sector.

Criterion 12: 'The distribution, physical and visual separation of the necklace villages'.

The assessment states that *"it provides separation between the new edge of Cambridge and both Hauxton and Little Shelford....The sub area (8.1) plays a key role in the separation between Cambridge and Great Shelford"*.

The emerging masterplan for Cambridge South takes account of the separation between Cambridge and Great Shelford, and separation is retained with an open, undeveloped landscape.

Criterion 13: 'Scale, character, identity and rural setting of the necklace villages'.

The assessment notes that *"this sector plays a limited role in the setting of Great Shelford, given the separation from the village by the railway line"*. This contradicts the assertion at Criterion 12.

Criterion 14: 'Designated sites and areas enriching the setting of Cambridge'.

The assessment states that *"the sector includes a settlement complex north of Hauxton village, which is designated as a Scheduled Ancient Monument"*.

The emerging masterplan for Cambridge South takes account of the Scheduled Ancient Monument and no development is proposed in its environs.

Criterion 15: 'Elements and features contributing to the character and structure of the landscape'.

The assessment states that the *"Boundary hedgerows and drainage ditches contribute in a small way to the character of this sub area, although it is its openness that is more distinctive"* and continues *"the lack of a strong landscape structure increases the risk of urban sprawl if development is extended into this sub area in the future"*.

The increased risk of urban sprawl because of the lack of a strong landscape structure is a design issue, not a Green Belt issue. The emerging masterplan for Cambridge South will create a strong landscape structure with a strong, green edge so that there will be little risk of a perception of urban sprawl.

Criterion 16: 'A city set within a landscape which retains a strong rural character'.

The assessment states that *"this sub area retains much of the rural character, but there are a number of urbanising influences on it. These include the visual intrusion of the continuing development at Glebe Farm, which encroaches on the rural character, as well as the presence of traffic along the M11, both visually and audibly. Existing development along the A1307 is also visible. The effect of the ongoing Glebe Farm development should reduce one development is completed and the surrounding planting begins to mature"*.

The assessment continues that as far as the Importance of the Sector to Green Belt Purposes is that 8.1 *"ensures the expansion of the city does not continue unchecked... retains open countryside close to the expanding edge of the city and prevents the sprawl of built development as far as the M11"*. It is not clear why LDA Design consider that well designed development as far as the M11 would be detrimental to the Green Belt purpose. LDA Design continue that a *"distinctive gateway to the city is being created at Trumpington Meadows and Glebe Farm"* but they are clear that this is the gateway to Trumpington and the gateway to Cambridge does not start until the double roundabout with the junction of Fen Causeway with Lensfield Road (Reference 2).

3.17 The assessment also notes at paragraph 6.11.3 'Importance to Green Belt Purpose' that 8.1 is *"key in the separation between the edge of Cambridge and the necklace villages of Great Shelford, Hauxton and Little Shelford"*. However, the emerging masterplan of Cambridge South accounts for the retention of separation between an extended edge of Cambridge and the villages of Great Shelford, Hauxton and Little Shelford.

3.18 The assessment further looks at the 'Implications of Green Belt Release for Development' citing that substantial harm would occur to Green Belt purpose of separation between the edge of

the city and the M11. Separation between the edge of Cambridge and the M11 is not a Green Belt purpose, and nowhere in the historic literature is there any reference that the separation between the edge of the city and the M11 is important to the Green Belt purpose.

3.19 It continues that the distinctive gateway to the city that is being created at Glebe Farm/Trumpington Meadows would be affected. This gateway is to Trumpington (Reference 2), not Cambridge. The gateway to Trumpington is not a Green Belt matter.

3.20 The assessment alludes to development of area 8.1 as significantly encroaching on the separation between Cambridge and the necklace villages. As already stated, the emerging masterplan for Cambridge South takes account of and retains the separation between Cambridge and the necklace villages.

3.21 With regards the parameters for Green Belt release of Sector 8.1, LDA Design set out a number of points which can be mitigated through good design. LIH and Pigeon conclude that any mitigation required to address the points LDA Design raise can be achieved within the emerging masterplan.

3.22 It should be noted that a considerable number of the qualities described as relevant to Green Belt purpose are, in fact, landscape issues and can be addressed through the masterplanning process.

Compactness

3.23 The idea of a 'compact city' is referred to in a number of documents including the LDA Design study, although there does not appear to be a fixed definition of what is meant by 'compact'. Compactness could be a combination of the idea of a large historic core; the short distance between the edge of Cambridge and the City Centre especially on the west side of Cambridge; a City easily crossed by foot and by bicycle; or a compact (dense) city rather than a sprawling city. LIH and Pigeon have previously outlined and submitted the values historically attributed to the Green Belt. It is set out here as Appendix 2 for convenience. The purpose which is consistently mentioned in all the historic literature is its role in preserving the setting and special character of the historic town. Safeguarding the countryside from encroachment is emphasized less.

3.24 The concept of 'compactness' is encompassed in the first four qualities identified by LDA Design in their study. However, it should be clear that the characteristic of compactness does not preclude expansion of the city.

3.25 Holford (1950) illustrates his idea of how the city could be developed whilst still retaining its compactness. The plan is reproduced here at Reference Map 1. Later, Logie 1966 (Reference Map 2) and Parry Lewis 1974 (Reference Map 3) describe how Cambridge could be developed whilst still retaining a compact city with the countryside being easily and quickly accessible. It is interesting to note that Cambridge South is omitted from the main preservation areas in the Holford report, and both Logie and Parry Lewis show development proposed in the area of Cambridge South. The idea that little development should occur in Cambridge otherwise its compact nature would be

destroyed is erroneous. With proper planning, as illustrated by these authors and the new developments resulting from the Green Belt released in 2006, further development can enhance access opportunities between homes and places of employment. Opportunities for access between residential areas and open countryside can be achieved and the walkability of the City and the short distance between the open countryside, especially on the west side, retained. With appropriate planning and development on the edge of Cambridge, the historic core would remain 'large' and all the attributes of 'compactness' retained.

Inconsistencies between the LDA 2002 and LDA DESIGN 2015 reviews.

4.1 It is recognised that these documents were prepared under a different policy context, however, the methodology for Green Belt review has not been affected by policy considerations, and the basis of Green Belt review remains unchanged. The inconsistencies between these two reports are not attributable to policy change.

4.2 The earlier review in 2002 by LDA (RD/STRAT/200) was commissioned by South Cambridgeshire District Council (SCDC) following the requirement by RPG6 that *"A review of the Green Belt should be carried out and any proposals for changes to its boundaries included in development plans. The review should start from a vision of the city and of the qualities to be safeguarded"* (DETR and Government Office for the East of England 2000, Policy 24). The 2002 LDA study was broad brush and not intended to identify potential development sites (Reference 4).

4.3 Whereas the LDA Design 2015 study, like the 2002 study, assesses virtually all areas of land within the study area as being of importance to Green Belt purposes, the later report went on to consider whether it may be possible that certain areas of land could be released for development without significant harm to Green Belt purposes. This was assessed on a sector/sub-area basis and presented in section 6 of the report. This latter stage was not undertaken in the 2002 study.

4.4 LDA 2002 page 3 para 4 suggests that there is potential to develop parts of 'the areas east and south of Trumpington' without causing significant detriment to Green Belt purposes. Cambridge South lies to the south of Trumpington and yet in the LDA Design 2015 study, this area has been dismissed. In contrast, the 2002 study did not identify opportunities for large scale development south of Addenbrooke's and yet the 2015 study identifies land to the south of Addenbrooke's Biomedical Campus as capable of accepting development without undue harm to Green Belt purposes. The findings of the 2015 study contradict the 2002 study without explanation of what differences have occurred in the intervening period which affect Green Belt purpose.

4.5 The two most notable differences in the LDA 2002 Study and the 2015 LDA Design Study specifically relating to Sector 8 are set out in Reference Table 3.

4.6 Cambridge South is described as Connective Townscape/landscape in 2002, however, in 2015 the area to the north of the sector is described as Supportive Townscape/Landscape. As we have shown, there is a ranking element to this scoring, with Supportive Townscape/Landscape of higher value to the townscape and landscape role and function than Connective

Townscape/Landscape (and with the methodology used, the perceived value to Green Belt even though it is a landscape attribute). In the thirteen years between the two studies, the north part of the Cambridge South site has somehow increased in value. LDA Design in their 2015 study describe the new development of Glebe Farm as creating a strong and recognisable new area of Cambridge, supporting the distinctive character of the city as an explanation as to why the landscape role and function has increased in the northern part. This is not relevant to Green Belt purpose, and not a reason to prevent development due south of Glebe Farm. Any new, well designed, development should result in a strong and recognisable new area of Cambridge, just as Glebe Farm has done. When compared to the other examples given for Supportive Townscape/Landscape it is questionable whether the urban edge of Trumpington Meadows and Glebe Farm merits this category.

4.7 If this thesis is to hold any water, the flats which formed the edge of Cambridge on Hauxton Road in 2002 were also a strong and recognisable area of Cambridge and therefore should not the land due south of the flats have been described as “Supportive Townscape/Landscape” in the 2002 report? Whether one found them attractive or not is a moot point, but the flats on the southern edge of Cambridge in 2002 certainly met the definition of Supportive Townscape/Landscape as LDA Design have set out and applied. Such a designation in 2002 should not and did not preclude the development of Glebe Farm and nor should the designation preclude any development to the south of Glebe Farm now.

4.8 The sectors and sub-areas should be assessed consistently for the study to be robust. The assessment is not consistent.

Inconsistencies between the LDA Design 2015 Inner Green Belt Boundary study and the Councils’ 2012 study

5.1 The Councils recognise that two areas of land within Sector 8, Area 2 and Area 4, have a Low value for Importance to Green Belt (corrected value of Importance based on derivation of importance to setting, character and setting, please see Appendix 1). These areas, according to the Councils’ assessment, are eminently suitable for consideration as reasonable alternatives (Reference 5).

5.2 The LDA Design 2015 study states that the majority of sub area 8.1 plays a key role in the setting of Cambridge with no acknowledgement that there are areas within 8.1 which have a lesser value of importance to Green Belt purposes. The LDA study of 2002 indicates that a broad brush approach has a strategic relevance and, as it is not concerned with a field-by-field assessment, cannot precisely identify changes to the Cambridge Green Belt boundary (Cambridge Green Belt Study Page 1 paragraph 7). The LDA 2015 Design study takes such a broad brush approach. It does not identify all land of relatively lower value to the Green Belt purpose and is not conducive to considering the requirements of NPPF paragraph 84 and 85.

5.3 The Councils’ 2012 assessment describes the area to the south of Addenbrookes, 10.2, as having a High importance to the Green Belt, with a significance of development as Very High. It is

on rising land on the foothills of the Gog Magog Hills (identified as “Defining Character” in the Cambridge Landscape Character Assessment RD/STRAT/170). The LDA Design 2015 study states that 10.2 *“plays a key role in the setting of the south of Cambridge, forming the most westerly extent of the foothills of the Gog Magog Hills, which form the backdrop to all views out from and across Cambridge in this direction. The sector also prevents the continued sprawl of Cambridge to the south...”* and yet the report continues that *“land released along the northern edge of sub area 10.2 should extend no further from the existing Green Belt boundary than the northern corner of sub-area 10.3.....”*. The Councils now propose to allocate this area on the northern edge of sub-area 10.2 as provisional main modification PM/SC/8/A for an employment allocation E/1b even though this land is perceived to be of High importance to the Green Belt by the Councils with a Very High significance of development.

5.4 It is not at all clear what the threshold value of importance to the Green Belt is applied in the allocation proposals for the edge of Cambridge, or indeed their selection of reasonable alternatives.

5.5 The Site Options, GB1 – GB6, have a value of Medium/High and Medium importance to Green Belt (Reference Table 4). The 2012 Inner Green Belt Boundary Study is clear that a *“sensitivity score of medium/low/negligible indicated that any change to the Green Belt boundary would have limited an (sic) effect on Green Belt purposes”*. This ‘Medium’ threshold below which a site could be considered as a reasonable alternative site is no longer valid as areas of High importance and Very High significance of development are now proposed allocations (Reference Table 4).

5.6 It is important that the criteria by which a site is considered as a reasonable alternative is absolutely clear so that it can be understood how the various dimensions of sustainable development were assessed and weighted in accordance with the requirements of paragraph 85 of the NPPF.

5.7 The Councils are relying on both these studies to inform their evidence base. However, they are not consistent and it is presently not clear what the status of these two documents are in relation to one another, nor the threshold for the consideration of a site as a reasonable alternative.

Conclusion

6.1 It is clear that in considering the three planks of sustainability: economy, society and environment; development on the edge of Cambridge is the most sustainable option. Many sustainability issues such as likely out-commuting to places of work from new settlements, the use of fossil fuels, levels of pollution and the cost and delivery of infrastructure and services are based on concrete evidence. The effect on climate change must also be considered.

6.2 The Councils agree that edge of Cambridge development is second in the hierarchy of sustainable development locations but the majority of sites have been rejected in preference to a

dispersed pattern (Reference 6). It is not clear that the challenges of making dispersed development sustainable are fully addressed, nor is it clear whether the infrastructure and services required by dispersed settlements can be delivered.

6.3 If the protection of the Green Belt is determined to outweigh all other considerations, it must be very clear that the Green Belt review is robust and consistent in identifying all reasonable alternative site options so that these can be properly judged and balanced with the other dimensions of sustainability in order to comply with paragraphs 84 and 85 of the NPPF

6.4 Paragraph 84 of the NPPF requires that account should be taken of the need to promote sustainable patterns of development. The consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary should be fully considered.

6.5 Paragraph 85 of the NPPF requires that local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. The planning authorities are clear that development on the edge of Cambridge is the second most sustainable location for development. It is therefore incumbent that the Green Belt review is robust, transparent and rigorous in identifying all sites which could be considered as reasonable alternatives. This has not been achieved.

6.6 LIH and Pigeon have shown there are discrepancies in the LDA Design 2015 study and between that study and the Councils' earlier studies. We have shown that using the Councils' own methodology employed in their Inner Green Belt Boundary Study 2012 but applying a finer sieve approach using smaller land parcels, more land which could be released without undue detriment to Green Belt purpose is identified. The Councils' evidence base does not identify all land which could be considered as reasonable alternative sites.

6.7 Whilst Green Belt review has been undertaken on the Edge of Cambridge locations, none has been undertaken on the likely effects of the major infrastructure required by the dispersed model where it passes through areas of high importance to the Green Belt. It is very likely that if a dispersed pattern of development is pursued it will be detrimental to the economy, community and the environment. This should be judged and balanced against the retention of Green Belt on the Edge of Cambridge locations.

6.8 The weight given to the protection of Green Belt and the threshold at which the importance to the purpose of Green Belt is considered as so important to outweigh all other objectives of sustainable development should be clearly set out by the Councils. The Councils have not set a consistent threshold of perceived importance to the Green Belt below which they would consider land to be a reasonable alternative site. Currently, the highest value of a proposed allocation is Very High according to the Councils' 2012 Inner Green Belt study. If Very High is the new threshold, other locations must also be considered as reasonable alternatives.

6.9 It is not understood how the various dimensions of sustainability are weighted to allow the Council to find that Edge of Cambridge sites must be rejected even though they are in more sustainable locations due to undefined Green Belt purpose.

6.8 The Councils concede that the 2012 Inner Green Belt Study does not take account of the need to promote sustainable patterns of development as required by paragraph 84 of the NPPF. The LDA Design 2015 study states that their Study does not take account of NPPF paragraph 85 (paragraph 1.1.5). Neither does the latter study take account of paragraph 84 of the NPPF. The Councils state they have prepared new evidence to demonstrate compliance with paragraphs 84 and 85 of the NPPF (Reference 7), but to satisfy the requirements of paragraphs 84 and 85 the Councils must have a robust and in-depth evidence base so that all reasonable alternatives are identified, assessed and weighed against the other dimensions of sustainability with the weight attributed in coming to decisions clearly set out. This has not happened.

6.11 LIH and Pigeon consider that in order to comply with the requirements of paragraph 84 and 85 of the NPPF;

- the Councils should be resolute in their aim to identify all land on the edge of Cambridge which is of lesser importance to the Green Belt and which should be identified as a reasonable alternative to dispersed development;
- Green Belt assessment should be clear, robust and consistent;
- the value of importance to Green Belt at which the Councils cannot accept Green Belt release for development due to harm to the Green Belt purpose should be clearly set out; and
- the balance of weight given to the various dimensions of sustainability against the consideration of importance to the Green Belt should be clearly set out.

These points are not achieved. The proposed modifications do not comply with paragraph 84 and 85 of the NPPF and the Local Plans' strategy remains unsound.

REFERENCE TABLE 1

Table 1: Purpose of Green Belt review undertaken by Councils

Recent Green Belt studies undertaken by, or on behalf of the Councils	Purpose of study
The May 2012 study undertaken by CCC	<i>“The appraisal specifically considered zones of land immediately adjacent to the City in terms of the principles and function of the Green Belt. It does not identify specific areas with potential for further release”.</i>
2012 Inner Green Belt Boundary Study December 2012 undertaken by CCC and SCDC	<i>“The purpose of the study is to provide an up to date evidence base for both Councils’ new Local Plans. In particular it will help the Councils reach a view on whether there are specific areas of land which could be considered for release from the Green Belt and allocated for development to meet identified needs, without significant harm to Green Belt purposes.”</i>
Cambridge Inner Green Belt Boundary Study November 2015 undertaken by LDA Design.	LDA were commissioned to undertake the following two pieces of work: 1. <i>“To undertake assessment of the Inner Green Belt Boundary and set out the methodology used. The assessment should provide a robust, transparent and clear understanding of how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt.</i> 2. <i>To review the methodologies put forward by objectors in relation to the Inner Green Belt Boundary.”</i>

REFERENCE TABLE 2

Table 2: Claims made of the similarity of Green Belt Assessments

Source	Quotation
Development Strategy Update November 2015	Paragraph 4.62: <i>“In the context of all evidence now available, the Councils have considered the merits of edge of Cambridge sites and the locational advantages they offer, against the significant harm that would be caused by substantial development on the edge of Cambridge to the purposes of the Cambridge Green Belt. The Councils’ assessment in 2012 of the importance of land on the edge of Cambridge to the purposes of the Cambridge Green Belt has been endorsed by the new independent assessment (with two main differences at land South of Cambridge Biomedical Campus and land South of Fulbourn Road)”.</i>

<p>LDA Deign Cambridge Inner Green Belt Boundary Study November 2015</p>	<p>Page 78. <i>“The methodology employed in this study....is significantly different from the methodology used by the Councils in their study. Nevertheless the conclusions are broadly similar, in that this study assess the great majority of land within the study area a being important to Green Belt purposes, with the Councils’ study identifying a broadly equivalent significance of development on the Green Belt”.</i> This study does not identify land which the Councils have identified as having Low, Medium or High significance. The study goes on that <i>“certain areas of land around the south and south-eastern edges of the city could be developed without significant harm to Green Belt purposes, provided any development meets specified parameters. Some of these areas correspond with areas given a lower score in the Councils’ study but those in sector 10 are scored as Very High significance in the Councils’ study”.</i></p>
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REFERENCE TABLE 3

Table 3: Main differences between the LDA 2002 study and the LDA Design 2015 study concerning Cambridge South

ASPECT OF ASSESSMENT	STUDY	REFERENCE	NOTES
VISUAL ASSESSMENT	LDA 2002 Study	Drawing Number 1641/LP/06	Cambridge South described as “rural setting with scattered villages” and the northern part as “level views, countryside foreground, generally soft urban edge”
	LDA Design 2015	Figure 9	Cambridge South Described as “Level views, countryside foreground, mixed urban edge”
TOWNSCAPE AND LANDSCAPE ROLE AND FUNCTION	LDA 2002 Study	Drawing Number 1641/LP/08	All Cambridge South described as Connective townscape/landscape

	LDA Design 2015	Figure 11	Northern part of Cambridge South described as “Supportive townscape/landscape” and southern part described as “Connective townscape/landscape”
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REFERENCE TABLE 4

Proposed allocations: Differences between Councils’ 2012 study and LDA 2015 study.

Proposed allocation	Councils’ 2012 Importance to Green Belt	Council’s 2012 Significance of Development	LDA Design 2015 report
GB1	Medium	Medium	Area 11.1 – described as ‘Supportive landscape’ and <i>“prominent in the key elevated panoramic view of Cambridge from Wort’s Causeway (east) and from Magog Down”</i> .
GB2	Medium	Medium	Area 11.2 – described as ‘Supportive’ and <i>“prominent in the key elevated panoramic view of Cambridge from Wort’s Causeway (east) and from Magog Down”</i> .
GB3	Medium	Medium	Area 12.1 – described as ‘Supportive’ and <i>“this sector plays an important role in restricting further growth”</i> .
GB4	Medium	Medium	Area 12.1 – described as ‘Supportive’ and <i>“this sector plays an important role in restricting further growth”</i> .
GB5 (now retracted)	Medium	Medium	Area 13.1 described as ‘Supportive’ and
GB6	Medium/High	Medium/High	

Provisional main modification PM/SC/8/A employment allocation E/1b	High	Very High	<i>“plays a key role in the setting of the south of Cambridge, forming the most westerly extent of the foothills of the Gog Magog Hills, which form the backdrop to all views out from and across Cambridge in this direction”.</i>
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[Reference 1: Cambridge Inner Green Belt Boundary Study November 2015](#)

Paragraph 4.14.11 Distinctive Townscape/Landscape...*”are areas defined as specifically recognisable and distinctive to the city. They include townscape and landscape components such as distinctive buildings, quintessential views, the interaction of buildings forming spaces or the setting to local events, topographical features, setting and backdrops to the city, areas of rich biodiversity, historic approach routes and landmarks of distinctive character. These areas, frequently contiguous with the Historic Core, often borrow from or bestow character to it. Distinctive townscape/landscape is so distinctive to the city that similar areas or features are unlikely to be found in other historic towns and cities and it may well be unique”*

Paragraph 4.14.14 Supportive Townscape/Landscape...*”are areas of townscape/landscape which support the character of the Historic Core and Distinctive areas of the city. They provide the backdrop and ambience, and bolster the sense of place of the city and its approaches. Supportive areas and features are of a kind that may be found in other towns and cities but, due to their particular location or the way they influence the character and setting of the city, they are locally distinctive, recognisable to those familiar with the city as important elements of its character and identity.”* Examples given are green spaces such as Coldham’s Common and along the River Cam west of Fen Ditton; areas of townscape including Chesterton; Cambridge Science Park and St John’s Innovation Park; etc

Paragraph 4.14.17 Connective Townscape/Landscape...*”are areas of townscape/landscape which are an integral part of the city and its environs, but may lack individual distinction or do not make a significant contribution to the setting of the city. This does not signify that these areas are unimportant, or lacking in their own identity; they may have significant merits in their own right. Rather, they are often areas with little relationship to their landscape setting, or to landmarks within the Historic Core or its landscape setting. Due to their location or character, they may contribute little to views of the city or other elements of its setting. Generic development forms with little sense of place can also contribute to the loss of local identity.”*

[Reference 2: Cambridge Inner Green Belt Boundary Study November 2015 Paragraph 4.11.8](#)

“From the M11, there is a short stretch of open countryside before the distinctive urban gateway of the ongoing development at Trumpington Meadows, Glebe Farm and Trumpington, and there are views to the historic village core. The character of the route is then green and treed up to Vicar’s Brook and the Botanic Garden, where the urban gateway to Cambridge occurs. Before this point, the approach does not feel strongly urban because there are mature trees and tall hedges on both sides of the road, the houses are set back from the road on the eastern side and there is the occasional glimpse across fields and the golf course to the west. The gateway to Distinctive Cambridge is at the double roundabout with Fen Causeway and Lensfield Road, which defines the edge of the historic core. This approach is of particular note because the

gateway to Distinctive Cambridge is very close to the second urban gateway, enhancing the perception of Cambridge as a compact city."

[Reference 3: Cambridge Inner Green Belt Boundary Study November 2015 Paragraph 3.2.5](#)

"The definition of the sectors on a simple spatial basis, as described in the previous paragraph, does not reflect variations in land use, character or context, which occur in the majority of the sectors. Most sectors were therefore divided into sub areas where there were clear changes in these characteristics which would affect the application of the assessment criteria to different areas of land. This enables a robust and transparent assessment of the various sub areas. The sub areas differ significantly from those used in the Councils' 2012 Inner Green Belt Boundary Study, which used different criteria for sub-division."

[Reference 4: Cambridge Green Belt Study. A vision of the Future for Cambridge in its Green Belt Setting. 1.1 Paragraph 7](#)

"This study of Cambridge and its setting is a strategic one, covering broad tracts of land but, nevertheless, considering some aspects in a fairly high level of detail. Being strategic, however, it is not concerned with a field-by-field analysis or with identifying, precisely, any recommended changes to the Cambridge Green Belt boundary.....However, it is not intended that this study should be used to support or argue against housing development on any specific sites, except in the area of more detailed study in East Cambridge."

[Reference 5: 2012 Inner Green Belt Boundary Study \(RD/STRAT/210\)](#)

Paragraph 5.8. *"A sensitivity score of medium/low/negligible indicated that any change to the Green Belt boundary would have limited an(sic) effect on Green Belt purposes."*

[Reference 6: Development Strategy Update November 2015](#)

Paragraph 4.35: *"The distribution of growth between these two strategic options in the middle of the development sequence (Edge of Cambridge versus New Settlements) is a key choice for the Local Plans. The edge of Cambridge is higher in the sequence and has advantage in terms of accessibility. The Councils have always recognised this advantage. However, it needs to be set against Green Belt considerations and the new Green Belt study confirms that major release of land would cause significant Green Belt harm. New settlements offer an alternative means of delivering significant growth without requiring development in the Green Belt but require significant infrastructure provision to connect them to higher order services and jobs."*

[Reference 7: Development Strategy Update November 2015](#)

Paragraph 4.20: *"In response to the Inspectors' Letter, the Councils have prepared new evidence, including an independent review of the Inner Green Belt boundary and the Sustainability Appraisal Addendum 2015. These consider afresh the merits of development on the edge of Cambridge, including sites that assessments show would cause significant harm to Green Belt purposes. These are considered on a like for like basis with development options elsewhere in the sequence, including new settlements. Therefore the consequences of development outside the Green Belt have been compared with the consequences of further development in the Green Belt. This ensures and demonstrates that the Councils have complied with paragraph 84 and 85 of the NPPF in considering the implications of Green Belt on sustainable patterns of development and reach sound conclusions".*

REFERENCE MAPS

Holford 1950

Logie 1966

Parry Lewis 1974

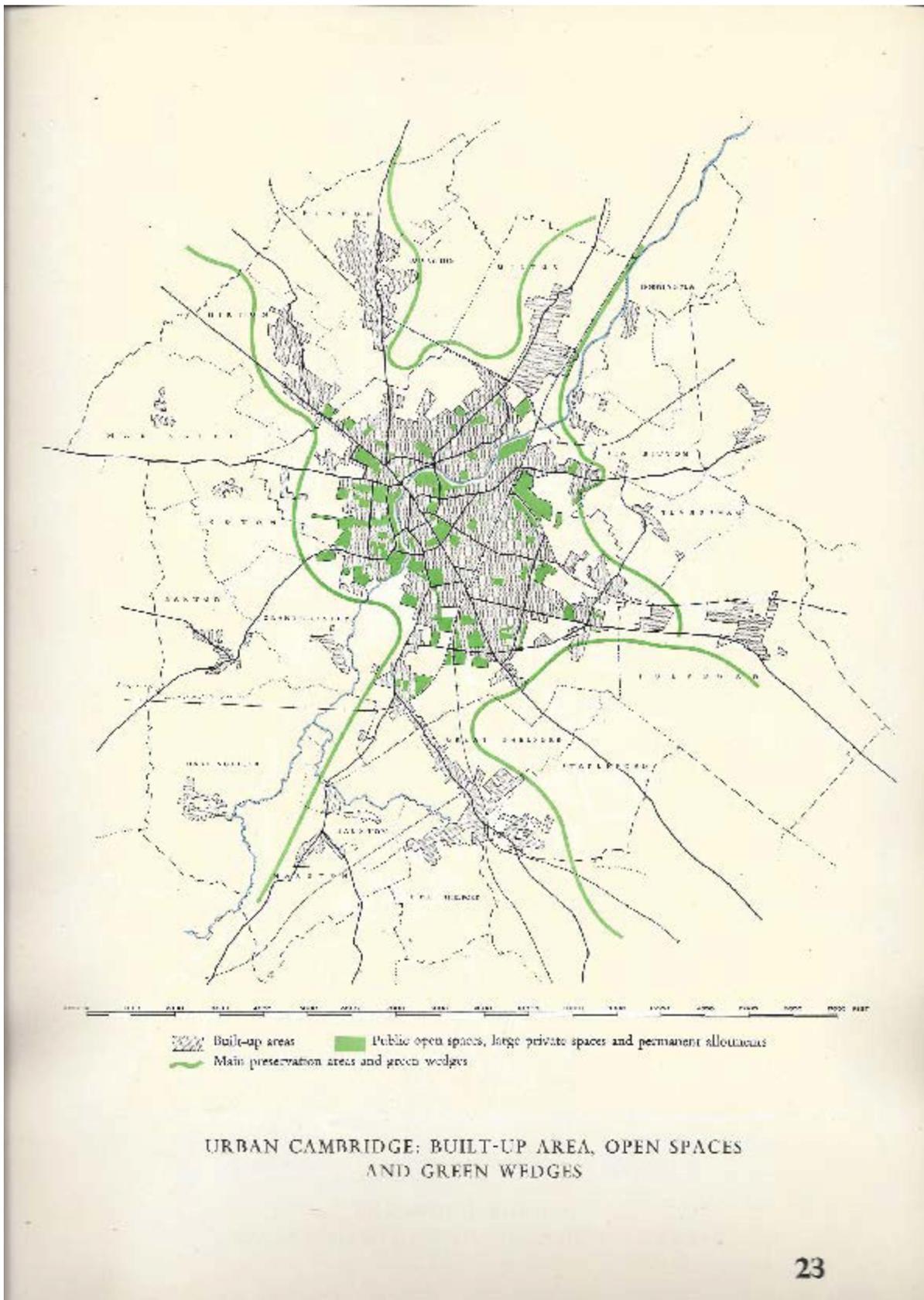


Figure 15 : Logies 1966
 Cambridge South

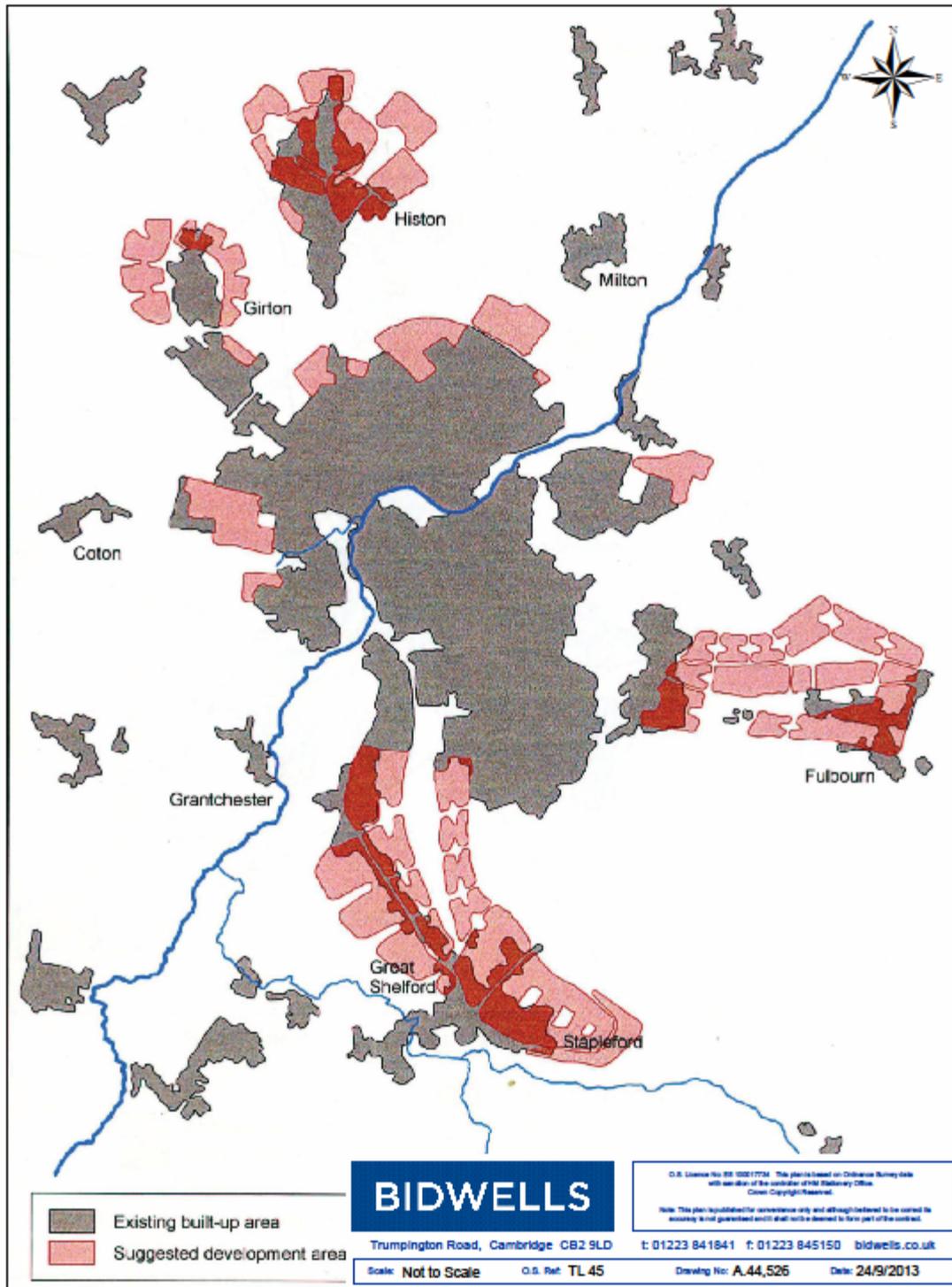
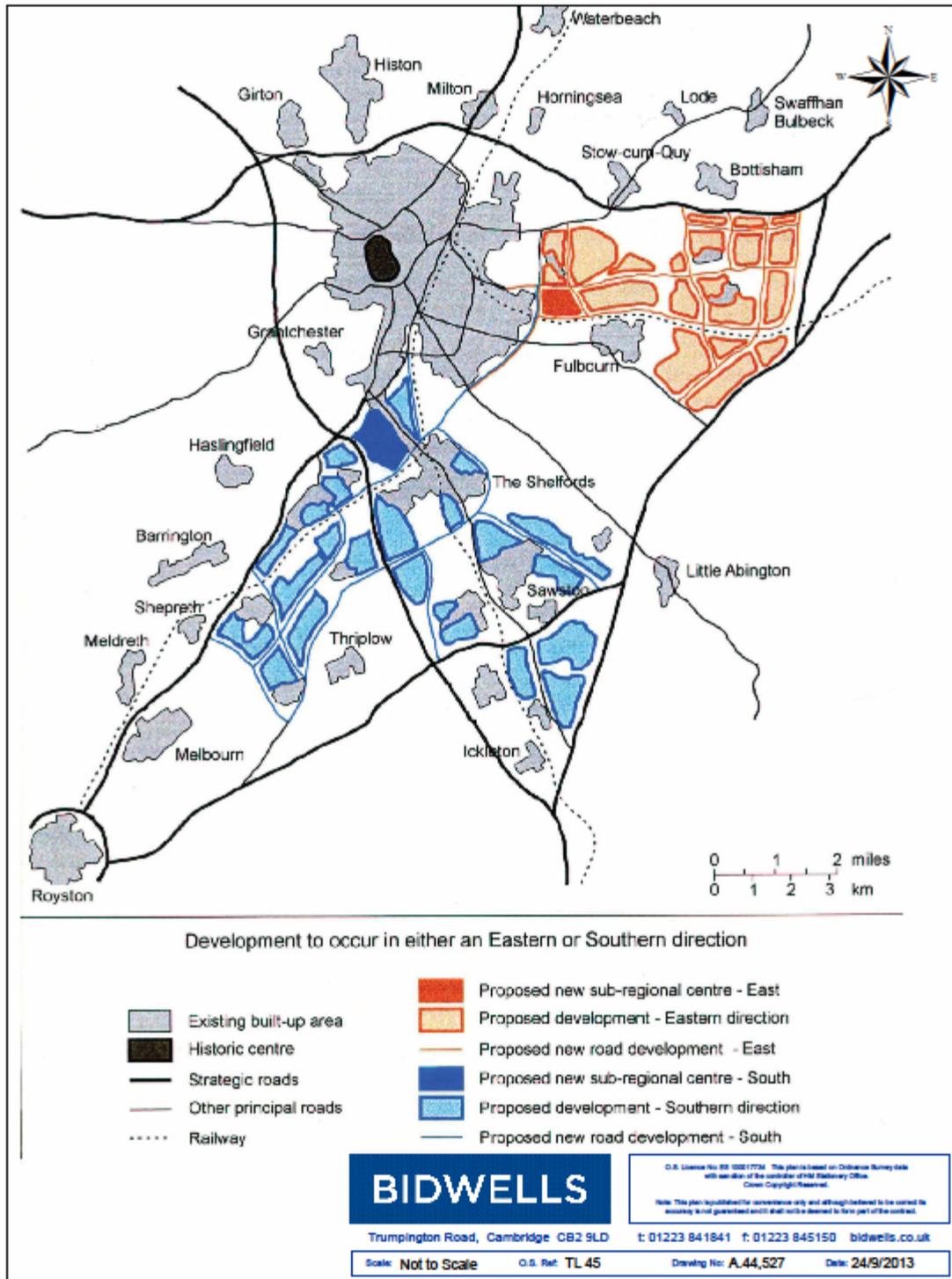


Figure 16 : Parry Lewis' 1974 Expanded City Strategy Development
 Cambridge South



APPENDICES

APPENDIX 1

APPENDIX 2

1 SUBMISSION TO THE INSPECTOR ON THE POINTS FOR CLARIFICATION SOUGHT BY PIGEON/LIH ON MATTER 6

- 1.1 During Matter 6, the Inspector asked the promoters of Cambridge South to liaise with the Councils on the anomalies they identified in RD/STRAT/210.
- 1.2 The points which Pigeon/LIH are seeking clarification were submitted to the Councils for their consideration on 17th February, 2015.
- 1.3 The Councils sent a general response to these point on 9th March, 2015 without addressing the specific points raised.
- 1.4 This statement sets out the identified anomalies for the Inspector's consideration.
- 1.5 Table 1 below sets out the Councils' findings on importance to setting, character and separation of all the areas around Cambridge. The value of Importance to Green Belt does not correspond to the highest value of importance to setting, character and physical separation and there is no evidence offered as to why this is the case.
- 1.6 Of the 53 areas assessed, there are 22 with an aggregated score which is higher than what could be expected from the assessment of setting, character and separation. There is no evidence offered as to what has skewed the assessment, nor how this relates to the purpose of the Green Belt. These 22 areas with an unsubstantiated higher score are highlighted in an amber colour in Table 1.
- 1.7 There are four areas, all in Sector 15, which are lower than the aggregated value which could be expected from the assessment of setting, character and separation. There is no evidence offered as to what has skewed the assessment, nor how this relates to the purpose of the Green Belt. These are highlighted in a blue colour in Table 1.
- 1.8 In total, there are 26 areas (49% of total) with an aggregated score for the Importance to the Green Belt which do not correspond with the assessment of setting, character or separation set out by the Councils. There is no evidence base to account for this deviation.

Table 1 – Anomalies in Aggregation of Significance to GB

SECTOR	AREA	Importance to Setting	Importance to Character of City	Importance to Separation	IMPORTANCE TO GREEN BELT (aggregated score)	Aggregation
1	1	High/Medium	Low	High	Very High	Additional importance added in aggregated score – no evidence to support
	2	Low	High	Very High	Very High	
	3	Medium	Low	Medium/High	Medium/High	
2	1	Very High	Very High	Negligible	Very High	
3	1	Very High	High	Not attributed in tables	Very High	
	2	Medium	Low	n/a	Medium/Low	
	3	High	Medium	n/a	High	
	4	Medium	Medium	n/a	High	Additional importance added in aggregated score – no evidence to support
4	1	Very High	High	Medium	Very High	
	2	High	Low	Negligible	High	
	3	Very High	High	High/Medium	Very High	
	4	Very High	Medium	High	Very High	
	5	Medium	Low	Low	High	Additional importance

						added in aggregated score – no evidence to support
5	1	High	High	High	Very High	Additional importance added in aggregated score – no evidence to support.
	2	High	High	High	Very High	Additional importance added in aggregated score – no evidence to support.
6	1	Low	High	Negligible	High	
	2	Low	High	Negligible	High	
	3	Very High	High	Medium	Very High	
7	1	Very High	High	High	Very High	
8	1	High	Medium	Medium	Very High	Additional importance added in aggregated score – no evidence to support.
	2	Low	Low	Negligible	Medium	Additional importance added in aggregated score – no evidence to support.

	3	Negligible	Negligible	Negligible	Medium	Additional importance added in aggregated score – no evidence to support.
	4	Low	Low	Negligible	Medium	Additional importance added in aggregated score – no evidence to support.
9	1	Low	Very High/Medium	Negligible	Very High	
10	1	Medium	Medium	Low	High	Additional importance added in aggregated score – no evidence to support.
	2	High	High	High	High	
	3	Medium	Medium	Medium	High	Additional importance added in aggregated score – no evidence to support.
11	1	Medium	Medium	Low	Medium	
	2	High	High	Low	Very High	Additional importance added in aggregated score – no evidence to support.

	3	Medium	Medium	Low	High	Additional importance added in aggregated score – no evidence to support.
	4	Medium	Medium	Low	Medium	
12	1	Low	Low	n/a	Medium	Additional importance added in aggregated score – no evidence to support.
	2	Low	Low	n/a	Medium	Additional importance added in aggregated score – no evidence to support.
	3	Very High	Medium	Low	Very High	
13	1	High/Medium	Low	High	Very High	Additional importance added in aggregated score – no evidence to support.
	2	High	Medium	High	Very High	Additional importance added in aggregated score – no evidence to support.
14	1	Medium	Low	High	Very High	Additional importance added in aggregated

						score – no evidence to support.
	2	Medium	Low	High	Very High	Additional importance added in aggregated score – no evidence to support.
	3	Low/Medium	Low	Medium	Medium	
	4	Low	Low	Low	Low	
15	1	Low	Negligible	Medium	Low	Lesser importance than aggregated score
	2	Low	Negligible	Medium	Low	Lesser importance than aggregated score.
	3	Low	Negligible	Medium	Low	Lesser importance than aggregated score
	4	Low	Negligible	Medium	Low	Lesser importance than aggregated score
16	1	Medium	Low	Low	High	Additional importance added in aggregated score – no evidence to support.
	2	Low	Low	Low	Low	

	3	Low	Medium	Low	Medium	
17	1	Low	Negligible	Low	Very High	Additional importance added in aggregated score – no evidence to support.
18	1	High	Medium	High	Very High	Additional importance added in aggregated score – no evidence to support.
	2	High	Medium	High	High	
	3	Medium	Low	High	High	
	4	Medium	Low	High	High	
	5	Low	Low	High	High	

Amber colour denotes an inflated aggregated value of Importance to Green Belt

Blue colour denotes a deflated aggregated value of Importance to Green Belt

- 1.9 49% of the assessments of Importance to Green Belt for the Sector/Areas do not relate to the assessment of setting, character and separation.
- 1.10 There is no evidence base why these valuations have deviated from the assessment of setting, character and separation.
- 1.11 The aggregation of the value of the Importance to Green Belt is flawed in 49% of the Areas with no explanation. As there is no evidence base to explain the deviations, RD/STRAT/210 is neither robust nor transparent.

Magnitude and Significance

- 1.12 For the first time at the hearing on Matter 6, we learned that the magnitude of effect (RD/STRAT/210 Table 1) was taken to be a dense, three to four storey housing development (there was some dispute at the Examination that two storey was mentioned).
- 1.13 We outlined that this assumption could not be applied universally, to a proposed research and development hub set in parkland for example.

- 1.14 We also find there are anomalies peppered through the document with regard to the Significance of Development on the Green Belt caused by the misuse of Table 1 RD/STRAT/210. Table 2 below sets this out with the anomalies highlighted in a pink tone.
- 1.15 The value of magnitude was extrapolated from the Councils' figures for Importance to Green Belt and Significance of Development as set out in Table 1 of RD/STRAT/210.

Table 2 Importance to Green Belt, Magnitude and Sensitivity

Sector	Area	Importance to Green Belt	Magnitude ¹	Significance of Development	Comments
1	1	Very High	Very High	Very High	The significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Very High	Very High	Very High	The significance should read MAJOR.
	3	Medium/High	High	Medium/High	
2	1	Very High	Very High	Very High	The significance should read MAJOR.
3	1	Very High	Very High	Very High	The significance should read MAJOR.
	2	Medium/Low	High	Medium	
	3	High	Very High	High	
	4	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB. This is not only wrong in the aggregation, it is wrong in the application

					of the matrix.
4	1	Very High	Very High	Very High	The significance should read MAJOR.
	2	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	3	Very High	Very High	Very High	The significance should read MAJOR.
	4	Very High	Very High	Very High	The significance should read MAJOR.
	5	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB. This is not only wrong in the aggregation, it is wrong in the application of the matrix.
5	1	Very High	Very High	Very High	The significance should read MAJOR. The significance is based on inflated aggregation

					value for Importance to Green Belt.
	2	Very High	Very High	Very High	The significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
6	1	High	Very High	High	
	2	High	Very High	High	
	3	Very High	Very High	Very High	The Significance should read MAJOR
7	1	Very High	Very High	Very High	The Significance should read MAJOR.
8	1	Very High	Very High	Very High	The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Medium	Very High	High	The Significance should read HIGH/MEDIUM. The

					significance is based on inflated aggregation value for Importance to Green Belt.
	3	Medium	No change	Negligible	The significance is based on inflated aggregation value for Importance to Green Belt.
	4	Medium	Very High	High	The Significance should read HIGH/MEDIUM. The significance is based on inflated aggregation value for Importance to Green Belt.
9	1	Very High	Very High	Very High	The Significance should read MAJOR
10	1	High	Not available in matrix.	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB. This is not only wrong in the aggregation, it is wrong in the application

					of the matrix.
	2	High		Very High	A Significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	3	High		Very High	A Significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB. This is not only wrong in the aggregation, it is wrong in the application of the matrix.
11	1	Medium	High	Medium	
	2	Very High	Very High	Very High	The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
	3	High	Very High	High	The significance is based on inflated aggregation value for Importance

					to Green Belt.
	4	Medium		Medium	
12	1	Medium	High	Medium	The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Medium	High	Medium	The significance is based on inflated aggregation value for Importance to Green Belt.
	3	Very High	Very High	Very High	The Significance should read MAJOR
13	1	Very High	High	High	The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Very High	Very High	Very High	The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
14	1	Very High	High	High	The significance is based on inflated

					aggregation value for Importance to Green Belt.
	2	Very High	Low	Medium	The significance is based on inflated aggregation value for Importance to Green Belt.
	3	Medium	High	Medium	
	4	Low	Medium	Low	
15	1	Low	Medium	Low	The significance is based on deflated aggregation value for Importance to Green Belt.
	2	Low	Medium	Low	The significance is based on deflated aggregation value for Importance to Green Belt.
	3	Low	Medium	Low	The significance is based on deflated aggregation value for Importance to Green Belt.
	4	Low	Medium	Low	The significance is based on deflated aggregation value for Importance to Green Belt.
16	1	High	Very High	High	The significance

					is based on inflated aggregation value for Importance to Green Belt.
	2	Low	Medium	Low	
	3	Medium	High	Medium	
17	1	Very High	Very High	Very High	The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
18	1	Very High	Very High	Very High	The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
	2	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	3	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR)

					cannot be achieved from a High Importance to GB.
	4	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	5	High	Very High	High	

Amber colour – denotes inflation of the aggregated value of Importance to Green Belt

Blue colour – denotes deflation of the aggregated value of Importance to Green Belt

Pink colour - denotes error in use of matrix

Red colour – denotes anomaly/error either in aggregated value or use of matrix, or both.

1.16 Setting aside any challenge to the Councils' interpretation of Importance to Setting, Importance to Character of City, and Importance to Separation, even so, we find there are 33 irregularities in the determination of Significance.

There are 53 Sector/Areas; 33 irregularities constitutes 58% of the Sectors/Areas being attributed to the wrong values of Significance of Development on the Green Belt according to the methodology.

These are the anomalies for which Pigeon/LIH seek clarification. Currently there is no justification for these anomalies. RD/STRAT/210 is not sound and should not be relied upon to identify land which could be released from the Green Belt.

Appendix 2

LH and Pigeon representation submitted September 2013

Appendix 2 – Green Belt Context

The Cambridge Green Belt tightly encircles Cambridge and extends three to five miles from the edge encompassing many villages. The Green Belt has been challenged and changed since it was designated.

The Cambridge Green Belt had its roots in the 1930s, began to be firmed up in the 1950s and was formally defined on the Town Map in 1965.

The Cambridge Preservation Society was founded in 1928 to *'foster public opinion towards the preservation of the beauties of Cambridge and its neighbourhood, and to cooperate with the County and Local Authorities and others, for this purpose'*. Soon after the Society was formed, it embarked on a programme of purchases of open farmland to the west of Cambridge around the villages of Coton and Madingley; places cherished by the dons as they can be reached easily on foot from the centre of the City. It also resorted to selective 'sterilisation' of land close to town by covenants from landowners not to build on their land. This was achieved in the case of Grantchester Meadows, the fields which line the west bank of the River Cam between the town and the village of Grantchester.

The Society was also represented on early planning committees and played an active part in the Cambridgeshire Regional Planning Report of 1934. The report proposed 'a chain of reservations ...which would, in effect, keep a generally open belt of country encircling Cambridge'. The report listed sites to be included; Madingley Hill to the west of Cambridge and the Grantchester Meadows. The Gog Magog Hills to the south east of Cambridge were also included.

The policies which led to the establishment of the Cambridge Green Belt are generally attributed to the work of Professor Holford and his colleague Mr Myles Wright. Their proposals were published in 1950 and known as the 'Holford Report'. However, there is a striking similarity between this and an earlier review by Dykes Bower in 1943. Only two copies of this earlier review remain. Both reports tried to do away with the idea that Cambridge was 'the only true 'university' town left in England' pointing out that commerce and industry has already taken the lead in expanding employment in the town and also pointing out the growth in jobs in central and local government. Both recognized the unique character of Cambridge and that uncontrolled growth was the main threat to the character of Cambridge. Holford recommended that the planning committee should try to reduce the rate at which Cambridge was growing and to reach a stable population at around 100,000 or 125,000 for the larger area of Urban Cambridge.

The Dykes Bower review addressed the need for 'one of the main planning aims of Cambridge' for 'abstention from building' to 'preserve the close approach of the country' on the west side of the town. This was also the approach of the Cambridge Preservation Society. Their main preoccupation at that

time was to prevent the indiscriminate spread of Cambridge into the surrounding countryside by way of 'ribbon development' and the introduction of mass production industry to the town, a fate which had befallen Oxford in the shape of the Morris motor works at Cowley.

The Draft Cambridgeshire Development Plan was published in 1952 and approved in 1954. It aimed to preserve Cambridge as a predominantly University town with a population ceiling of 100,000.

In 1957 the Minister gave approval in principle for a Green Belt round the City and the area covered by draft proposals from the County Council was to be immediately treated as Green Belt. Although the Green Belt was drawn tightly around the City as a planning tool to help maintain Cambridge as a small university and market town, it also introduced the concept of 'white land' to be a limited reserve for future development within the inner edge of the Green Belt.

The Green Belt was fully embodied in the Development Plan with the approval of the First Review of the Town Map in 1965.

Following consultation an amended Cambridge Green Belt Local Plan was put on Deposit in 1984. Since that time there were a series of modifications until the Green Belt Local Plan was adopted in 1992. The Cambridge Local Plan was adopted in 1996 with an amendment in the area of West Cambridge to take account of the needs of University development.

The history of the Green Belt shows a number of modifications over time (Figure 14) although one area of uniformity was that when compared with the five purposes of Green Belt policy set out in PPG2, the purpose which is consistently mentioned in all the historic Plans is its role in preserving the setting and special character of historic towns. Safeguarding the countryside from encroachment is emphasized less and assisting in urban regeneration is not considered relevant.

Challenges to the Green Belt

The future of the Cambridge Green Belt has been challenged throughout this period. The controls over new industry and commerce were relaxed in the 1970s. New businesses have been attracted to Cambridge, especially 'high-tech' firms which benefit from a close relationship with the University. The buoyancy of the local economy has led to a rapid increase in the population. Attempts were made to release additional areas, through representations on the Green Belt Local Plan and through the Cambridge Local Plan. There were a number of changes to the Green Belt boundary between 1965 and 1996, including the addition of an area to the south east of Cambridge which included part of Netherhall School, Limekiln Close and East Pit and some land released from Green Belt on the northern fringe of the City Figure 15.

However, with Cambridge unable to expand to accommodate increasing business and housing need, newcomers have largely settled in the outlying villages, now effectively detached suburbs. This has generated a large increase in local road traffic. The pressures on Cambridge and its sub-region by these trends called for a review of planning policies.

The concept of restraint surrounding Cambridge was questioned as early as 1966 when the Future Shape of Cambridge was published by the then City Architect and Planning Officer, Gordon Logie. It looked at how the City should develop over the next forty to fifty years, suggesting future tongues of development which would allow the City to grow, while maintaining and enhancing its man-made advantages and the principle of compactness Figure 15.

In the early 1970s Professor J Parry Lewis was commissioned by national and local government to undertake a Study of the Cambridge Sub-Region 1974. This study was concerned with taking the pressures off the historic centre of Cambridge. Parry Lewis concluded that Cambridge 'must grow in order to retain as much of its character as it can' and that the only way to conserve the historic centre was to have a major expansion Figure 16.

In the late 1990s Cambridge City Council presented a document entitled 'Cambridge Green Belt. Towards 2016' to support their view that there should be a radical reassessment of the Green Belt. The report set a case for the need for the continued growth of Cambridge as the economy and mobility amongst other factors had changed considerably during the period of the Green Belt Plan and that the pressing need was to reduce journey to work flows for the benefit of both employers and employees, and to address the issues of affordability of houses and housing need.

Whilst the economic and social argument for Green Belt release was strong, the Council acknowledged that environmental and landscape factors were important in any future consideration of shaping the Green Belt. However the Council recognised that 'Green Belt designation is not in itself any guide to the quality and value of the landscape' finding that 'not all of the Green Belt is of equivalent value with parts of it playing no important role' of supporting the purpose of the Green Belt 'other than by being part of a blanket presumption against development'.



Appendix 3





Objection to proposed
modifications relating to
the Sustainability Appraisal
Addendum 2015
CAMBRIDGE SOUTH

January 2016

Objection to proposed modifications relating to the Sustainability Appraisal Addendum 2015

Introduction

1.1 This response has been prepared to consider whether the proposed modifications to the Cambridge and South Cambridgeshire Local Plans and the Sustainability Appraisal Addendum (SA Addendum) are sound, as defined by National Planning Policy Framework (NPPF).

1.2 The Development Strategy Update 2015 states that sites are considered afresh on a like for like basis (Reference 1) and that the new independent review of the Green Belt together with the SA Addendum actions demonstrate compliance with paragraph 84 and 85 of the NPPF. The Councils concede that neither the Inner GB boundary study 2012, nor the 2015 LDA Design study takes account of paragraph 84 and 85 of the NPPF and presumably these matters are solely dealt with by the SA Addendum.

Interrelationship of Green Belt review with the SA process

2.1 The SA Addendum sets out at Section 5 the SA of the development sequence with a conclusion that whilst the edge of Cambridge sites have many sustainability benefits, the *'Inner Green Belt Study (2015) has concluded that it is unlikely that any development on the edge of Cambridge (apart from a few small exceptions) could be accommodated without substantial harm to the Green Belt purposes'* (page 53).

2.2 Considerable weight is placed on the Green Belt review evidence base to dismiss sites as reasonable alternative site options. LIH and Pigeon have shown that the Green Belt assessments undertaken by the Council in 2012 and by LDA Design in 2015 are not robust or comprehensive and are contradictory. This is not a sound evidence base. Decisions to delete sites as unreasonable should not be made on this evidence base.

2.3 The Councils state they have considered the merits of Edge of Cambridge sites and the location advantages they offer, against the significant harm that would be caused by substantial development on the edge of Cambridge to the purposes of the Cambridge Green Belt (Reference 1). The weight given to the role of the Green Belt as more important than all the other components of sustainability together, including climate change, must be founded on a water tight evidence base and fully justified. It is not.

2.4 LIH and Pigeon are clear, that in order to comply with the requirements of paragraph 84 and 85 of the NPPF;

- the Councils should be resolute in their aim to identify all land on the edge of Cambridge which is of lesser importance to the Green Belt and which should be identified as a reasonable alternative to dispersed development;
- Green Belt assessment should be clear, robust and consistent;
- the value of importance to Green Belt at which the Councils cannot accept Green Belt release for development due to harm to the Green Belt purpose should be clearly set out and justified;
- the disadvantages of dispersed developments should be clearly set out; and
- the balance of weight given to the various dimensions of sustainability against the consideration of importance to the Green Belt should be clearly set out and justified.

2.5 These points are not achieved. The SA Addendum does not clearly set out the weight given to the various dimensions of sustainability. There is no explanation of why the protection of Green Belt is more important than all other considerations; including climate change, which is central to the economic, social and environmental dimensions of sustainable development (paragraph 93 of the NPPF). The Local Plan strategy remains unsound.

SA Addendum Methodology

3.1 The Joint Site Assessment Proforma is given in the SA Addendum Report Appendix B, page 200. The following points are raised.

Climate Change

3.2 One of the main reasons why the New Settlement delivery option is less sustainable than Edge of Cambridge is the likely reliance in the dispersed option on the use of private cars to access places of work and major service centres (Reference 2). Climate change is driven by the release of CO₂ and consumption of fossil fuels. Transport is responsible for around a quarter of greenhouse gas emissions and is the second highest gas emitting sector (http://ec.europa.eu/clima/policies/transport/index_en.htm). The Councils' Proforma only accounts for 'Renewables' and 'Flood Risk' within the Climate Change SA criterion and takes no account of the effect of the transport effects with a dispersed model of development. This is a major omission.

3.3 According to the Councils' SA Addendum Proforma, the New Settlement Bourn Airfield option scores higher than the Edge of Cambridge, Cambridge South option for the Climate Change criterion. It is the same for the Air Quality criterion. This flies in the face of reality. Climate change driven by vehicular movement is location-dependent in the context of Edge of Cambridge versus New Settlement options. This likely significant effect is not reflected within the SA Addendum Proformas.

3.4 The British Government is signed up to the Paris Agreement of 2015 to tackle climate change as one of the major problems affecting the planet, and paragraph 93 of the NPPF is clear that tackling climate change is “*central to the economic, social and environmental dimensions of sustainable development*”. The effects of a Plan on Climate Change must carry considerable weight in formulation the Plan strategy. Paragraph 99 of the NPPF requires that “*Local Plans should take account of climate change over the longer term*” and paragraph 165 states that “*sustainability appraisal should consider all the likely significant effects on the environment, economic and social factors*”. None of these have been complied with. The effects of preserving the Green Belt and channelling development beyond the Green Belt into a dispersed model are not properly understood.

3.5 The consequence of the SA Addendum not taking account of the likely effect on climate change of increased transport movements means that there is no proper consideration of the effects on all the dimensions of sustainable development of channelling development beyond the outer Green Belt boundary. It does not comply with paragraph 84 and 85 of the NPPF. With the dispersed model there is no resilience to the impacts of climate change as greenhouse gas emissions are likely to increase. The Plan does not comply with paragraph 93 of the NPPF.

3.6 The issue of Climate Change ‘Renewables’ in the SA Addendum Proforma is considered as GREEN for SC057 & 238 the Bourn Airfield site and AMBER for Site CCSC1004 Cambridge South, Broad Location 5. The evidence for this is that “*Development would create additional opportunities for renewable energy*”. There is no justification that Cambridge South site would score less than Bourn Airfield. The assessment is inconsistent and biased towards New Settlements. This does not comply with the requirements of paragraph 84 of the NPPF.

Air Quality

3.7 The AQMA on the M11 and A14 is largely created by travel to and from Cambridge for purposes of work or accessing services or shopping facilities. The development of new, outlying settlements is likely to exacerbate the pollution problems. Whereas, development on the Edge of Cambridge is likely to have a higher proportion of the modal split taken up by cycling and walking.

3.8 In the section Air Quality criterion ‘*Would the development of the site result in an adverse impact/worsening of air quality?*’; the assessment gives Site CCSC1004 Cambridge South an AMBER score on the basis that there is a potential for an increase in traffic and static emissions that could affect local air quality. However, there is more likelihood in an Edge of Cambridge site for a modal shift towards walking and cycling.

3.9 A New Settlement site, SC057 Bourn Airfield, also scores AMBER even though there is more likelihood of increased vehicular trips and, relative to an Edge of Cambridge

development, likely to have an increased adverse effect. Only local effects are accounted for in the SA Addendum Proforma for Bourn Airfield and there is no reference to the effects further afield with dispersed development likely to increase vehicular trips to and from Cambridge and therefore likely to exacerbate the AQMA at the M11 and A14 locations.

3.10 It is unreasonable to apply a similar value of assessment for the Air Quality criterion for New Settlements as for Edge of Cambridge development. Paragraph 165 of the NPPF requires that all significant effects should be identified in the SA. The effect of dispersed development on the AQMA has clearly not been considered. The SA Assessment for Air Quality has not been undertaken on a consistent basis and is biased towards the New Settlements.

Assessment Anomalies

3.11 Referring to the SA Addendum Report Annex 1 Site Assessment Proformas and Summary Results, at first inspection the SA scoring of the Edge of Cambridge sites are clearly preferable in terms of sustainability than the New Settlement sites, corroborating the results of Section 5 of the SA Addendum. However, a number of the Edge of Cambridge sites seem to score badly on the Landscape and Townscape criteria which is difficult to explain in light of previous SA.

3.12 On closer inspection there appears to be a number of anomalies and inconsistencies in the SA Addendum, not least because there is no equivalent in-depth assessment of landscape and townscape issues for the New Settlements as has been undertaken on the Edge of Cambridge sites with a resultant imbalance in the assessment and bias towards New Settlements.

3.13 At least three of the SA criteria for the Edge of Cambridge sites (Landscape, Townscape and Green Belt) are double counted as the LDA Design Inner Green Belt Boundary Study 2015 is used to substantiate the assessment as set out in the accompanying report on Green Belt issues.

3.14 However, the SA Addendum fails to take account of the potential effects on the Green Belt of the major transport infrastructure which has been identified as being required to support the proposed New Settlements. This should have been recorded within the Green Belt criterion but appears to be overlooked. For example, site SC057 Bourn Airfield is allocated a GREEN value even though *“bus priority measures and cycling and pedestrian improvements between Cambourne and Cambridge, planned to secure wider benefits, would also be required to serve this site”*.

3.15 The assessment has not been undertaken on a like for like basis and there is a bias towards New Settlements. This does not allow a consistent and equitable application of the relative weighting of the various dimensions of sustainability in the assessment.

3.16 The following examples are offered to illuminate the inconsistent manner the assessment has been applied.

Sites CCC930 Edge of Cambridge Broad Location 7, Land north of Worts' Causeway; and Site E/1B Land south of Addenbrooke's and southwest of Babraham Road;

3.17 These sites are proposed allocation sites of 7.33ha and 8.91ha respectively. Previously they were assessed as parts of larger sites. This underlines LIH and Pigeon's fundamental point that when smaller parcels of land are assessed, they are more likely to be appropriate in the context of releasing land from the Green Belt for development without undue harm to the purpose of the Green Belt.

Site CCSC1004 Edge of Cambridge Broad Location 5 Land to the south of Addenbrookes' Road, Cambridge and CC904 Land East of Hauxton Road. (This site is previously described as SC105 in the Proformas for Broad Location 5).

3.18 The Landscape criterion is RED describing that development would extend the urban edge down the slope to meet, or close to, the M11 corridor. The emerging masterplan mitigates this concern by proposing the creation of a soft green edge to the M11 corridor.

3.19 The Proforma states that the *"newly defined urban edge of Addenbrooke's Road.....should be preserved"* with a justification that Glebe Farm creates a strong urban edge. This is not relevant as any new development will create a strong urban edge. The designation of part of the site is described as 'Supportive' because it forms the setting for this new urban edge. The accompanying response submitted on Green Belt issues already addresses this point (please refer to Objection to proposed modifications relating to Green Belt Issues paragraph 4.7) as prior to the new development of Glebe Farm, there was a strong urban edge which did not preclude the development of Glebe Farm. The Proforma also contradicts itself as the Green Belt criterion for CC904 'Distinctive Urban Edge' describes the urban edge *"of a lesser quality, and if the above restriction applies (that is, "with development restricted to low level, low density with a soft green edge") it could be mitigated"*. It is clear that the Councils' position is that some parts of this site could be developed without undue harm to Green Belt purpose.

3.20 The Proforma continues that the landscape buffer between the edge of Addenbrooke's Road and the M11 should be preserved. There is no justification whatsoever for this. A soft green edge could be created through an appropriately designed high quality development which would mitigate the edge and provide a green setting in this area.

3.21 In the Landscape section adverse impacts on Green Belt are also cited as a reason for the assessment of the significant negative impact if this site were developed. This is double counting. The Green Belt is a separate criterion.

3.22 In the Townscape section, it describes an extensive development on higher open ground. The land is mostly between 15 and 20m AOD, which is not high. The site rises to Stone Hill at just over 20m AOD in a low ridge running parallel to Shelford Road. The closest high areas are at White Hill about 2km away with the urban area of Shelford Road separating it from the site, and the area around Money Hill to the south of Haslingfield approximately 4km away with the infrastructure of the M11 and junction 11 separating it from the site. The emerging masterplan takes the ridge into account and there is no proposal for development above 20m AOD. A soft green edge is proposed to the River Cam, the M11 and Hauxton Road.

3.23 Cambridge South is largely contained by infrastructure, the M11, the railway and Hauxton Road. The SA Addendum Proforma claims the site is open and highly visible from areas to the west, south and southeast. The emerging masterplan ensures separation from Great Shelford. Potential views from the southeast and Great Shelford are curtailed by the railway line. Views from the west can be had from Hauxton Road and the M11, but the emerging masterplan proposals offer a soft green edge in these locations. Further afield the motorway and junction infrastructure separate the site from direct views. To the south, adjacent to the River Cam, a soft green, set back edge is proposed, with pedestrian access opened up for the enjoyment of the river corridor in this location. This will bring potential benefits to the townscape and the landscape.

3.24 The Green Belt criterion assesses a significant negative impact on Green Belt purpose due to the site being highly visible. This is the same reason given for the Landscape criterion and is another example of double counting, masking the SA by overemphasising (double counting) the same perceived negative points.

3.25 The Inner Green Belt Boundary Study 2015 is cited as it refers to the distinctive separation between the edge of the city and the M11 and the distinctive gateway being created at Trumpington Meadows and Glebe Farm. There is nothing in the Green Belt purpose that requires separation between the edge of the city and the M11. Separation between the edge and the M11 is not a Green Belt purpose. Nowhere in the historic literature on the Green Belt has it been claimed that a distinctive separation should be retained between the M11 and the city edge.

3.26 LDA Design state that the gateway being created at Trumpington Meadows and Glebe Farm is a gateway to Trumpington and that the gateway to Cambridge does not begin until the double roundabout at Fen Causeway and Lensfield Road. The preservation of a gateway to Trumpington is not a Green Belt purpose and therefore this reason should be discounted (Reference 3).

3.27 The Proforma continues that *“it is unlikely that any development within the majority of this sector could be accommodated without substantial harm to the Green Belt purposes”* contradicts the CC904 (part of the site) which states that *“Extending the urban edge to the south of the Addenbrooke’s Road at this location would not affect the compact nature of the city”*. It is also contradicted by the Councils’ 2012 Green Belt Review which identifies sites 8.1 and 8.4 as areas in which *“any change to the Green Belt boundary would have limited an(sic) effect on Green Belt pruposes”*.

3.28 There are areas within this large site which could be developed without substantial harm to Green Belt purpose. The emerging masterplan retains separation to the river, the M11 and Hauxton Road as well mitigating the potential effects on views by creating a soft green edge. The gateway that is being created is to Trumpington and not the city. The separation between Cambridge and the villages has been taken account of in the emerging masterplan so that no development is proposed where there could be a perception of merging.

3.29 We have, throughout the Local Plan process, drawn attention to the problems of the Councils’ broad brush approach to the Green Belt reviews. Cambridge South is 190 ha. There is only one site which exceeds this size – Broad Location 2 Site CCSC1001 – with the majority of sites around 40 to 50 ha or less.

3.30 There are variations across the 190 ha of Cambridge South. Also, the SA Addendum Proforma has not taken the emerging masterplan into account as no development is proposed where there could be a perception of Cambridge merging with the villages, and development is set back from the river corridor, the SMA, the M11 and Hauxton Road. The proposal will augment the new development at Trumpington Meadows and Glebe Farm as a gateway to Trumpington whilst not affecting the gateway to Cambridge which is close to the City centre at the double roundabout with Lensfield Road.

Site SC057 and 238 New Settlement Bourn Airfield

3.31 This site is assessed as having no landscape impact if developed, or could even provide minor improvements. This is unrealistic and there is no evidence base for this assumption.

3.32 The Proforma continues that assumptions are made that appropriate design and mitigation measures would be achieved. This is at odds with the assessment of the Edge of Cambridge sites where a high level of background evidence is applied but there are no assumptions made on the emerging design; either in terms of being in an appropriate location or providing mitigation for potentially negative effects.

3.33 The potentially negative effects of providing bus priority measures, cycling and pedestrian improvements are not properly addressed in the SA Addendum Proforma assessment of the Bourn Airfield site. These will have a potentially large negative impact on the Green Belt and Landscape criterion.

3.34 In the Townscape criterion, no impact or minor improvements was concluded, with a note that the development could be made compatible with local townscape character. This is equally true of Edge of Cambridge sites but has not been accounted for in the latter. This is not a consistent approach. The SA Addendum is biased towards New Settlements.

Review of the SA Addendum Proforma for Cambridge South

4.1 We have shown the SA Proforma assessment has been inconsistent. We have shown Site CCSC1004 Cambridge South is not consistent over its large area of 190ha. Also, various assumptions have been made in the Proformas which do not take into account the emerging masterplan. To address this, the Proforma of Site CCSC1004 is reviewed within this document to take account of these factors. The assessment is highlighted with (*) where this review differs from the Councils SA Addendum Proforma, and the reasons are given.

LAND			
PDL	Would development make use of previously developed land?		As Councils' Proforma
Agricultural Land	Would development lead to the loss of the best and most versatile land?		As Councils' Proforma
Minerals	Will it avoid the sterilisation of economic mineral reserves?		As Councils' Proforma
POLLUTION			
Air Quality	Would the development of the site result in an adverse impact/worsening of air quality	*	Although the site could increase traffic and static emissions overall (as any new development would), there is a greater likelihood for sites on the Edge of Cambridge to have a modal shift to options to travel on foot or by bicycle to places of work or trips to shops/services than

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			more distant development, and a relative improvement on more distant locations.
AQMA	Is the site within or near to an AQMA, the M11 or the A14?	*	Built development is restricted within 1,000 m of the M11
Pollution	Are there potential odour, light noise and vibration problems if the site is developed, as a receptor or generator (including compatibility with neighbouring uses)?		As Councils' Proforma
Contamination	Is there possible contamination on site?		As Councils' Proforma
Water	Will it protect and where possible enhance the quality of the water environment?		As Councils' Proforma
BIODIVERSITY			
Designated Sites	Will it conserve protected species and protect sites for nature conservation interest, and geodiversity?		As Councils' Proforma
Biodiversity	Would development reduce habitat fragmentation, enhance native species, and help deliver habitat restoration?		As Councils' Proforma
TPO	Are there trees on site or immediately adjacent protected by a Tree Preservation Order?		As Council' Proforma
Green Infrastructure	Will it improve access to wildlife and green spaces, through delivery of and access to green infrastructure?		

LANDSCAPE, TOWNSCAPE AND CULTURAL HERITAGE			
Landscape	Will it maintain and enhance the diversity and distinctiveness of landscape character	*	Whilst development would extend the urban edge, a significant soft green edge will be created to the River Cam, the M11 and Hauxton Road. No development is proposed on the higher ground of Stone Hill. Development of the site will bring access to the River Cam corridor.
Townscape	Will it maintain and enhance the diversity and distinctiveness of townscape character, including through appropriate design and scale of development?	*	The emerging masterplan carefully considers the context of potential development and will be mitigated by a soft green edge. There will be no development on higher land. Whilst there will be some local views from the west and south, there are no significant views from nearby high land that would have a significant adverse effect. Development is capable of being made compatible with local townscape character.
Green Belt	What effect would the development of the site have on Green Belt purposes?	*	The site does not have the same value of importance to Green Belt purpose across its extent. The emerging masterplan takes account of the Green Belt purposes and ensures there is no development which would provide the perception of coalescence between

			Cambridge and the surrounding villages, or on the higher land of Stone Hill. The gateway being created at Glebe Farm and Trumpington Meadows is a gateway to Trumpington. The emerging masterplan will be designed to augment the Trumpington gateway in a positive green approach. The gateway into Cambridge will not be affected by the proposals.
Heritage	Will it protect of enhance sites, features or areas of archaeological, or cultural interest?		As Councils' Proforma. No development is proposed on SAM.
CLIMATE CHANGE			
Renawables	Will it support the use of renewable energy sources?		As Councils' Proforma
Flood Risk	Is the site at flood risk?		As Councils' Proforma
HUMAN HEALTH AND WELL BEING			
Open Space	Will it increase the quantity and quality of publicly accessible open space?		As Councils' Proforma
Distance: Outdoor Sport Facilities	How far is the nearest outdoor sports facilities		As Councils' Proforma
Distance: Play facilities	How far is the nearest play space for children and teenagers?		As Councils' Proforma
Gypsy and Traveller	Will it provide for the accommodation needs of Gypsies and Travellers and Travelling Showpeople?		As Councils' Proforma

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Distance: District or Local Centre?	How far is the site from the nearest District or Local centre?		As Councils' Proforma
Distance: City Centre	How far is the site from the edge of defined Cambridge City Centre?		As Councils' Proforma
Distance: GP Service	How far is the nearest health centre or GP service?		As Councils' Proforma
Key Local Facilities	Will it improve quality and range of key local services and facilities including health, education and leisure (shops, post offices, pubs etc)		As Councils' Proforma
Community Facilities	Will it encourage and enable engagement in community activities?		As Councils' Proforma
Integration with Existing Communities	How well would the development on the site integrate with Existing Communities?		As Councils' Proforma
ECONOMY			
Deprivation	Does it address pockets of income and employment deprivation particularly in Abbey Ward and Kings Hedges?		As Councils' Proforma BUT it should be noted that an employment led mixed use development is proposed. As the site is within walking/cycling/public transport distance from these wards there it is likely that income and employment deprivation could be alleviated.
Shopping	Will it protect the shopping hierarchy, supporting the vitality and viability of Cambridge town, district and local centres?		As Councils' Proforma

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Employment - Accessibility	How far is the nearest main employment centre?		As Councils' Proforma
Employment Land	Would development result in the loss of employment land, or deliver new employment land?		As Councils' Proforma
Utilities	Will it improve the level of investment in key community services and infrastructure, including communications infrastructure and broadband?		As Councils' Proforma
Education Capacity	Is there sufficient education capacity?		As Councils' Proforma
Distance: from Primary School	How far is the nearest primary school?		As Councils' Proforma
Distance: Secondary School	How far is the nearest secondary school?		As Councils' Proforma
TRANSPORT			
Cycle Routes	What type of cycle routes are accessible near to the site?	*	The Councils' assessment is considered to be an underestimation. There are good cycle routes nearby and particularly along Addenbrooke's Road which meets the GREEN score. There will be good and close connection to the City Centre and Cambridge Biomedical Campus with cycle lanes upgraded where possible.
HQPT	Is there High Quality Public Transport?		As Councils' Proforma
Sustainable Transport Score	Scoring mechanism has been developed to consider access to and quality of public transport and cycling.		As Councils' Proforma

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Distance: bus stop/rail station			As Councils' Proforma
Frequency of Public Transport			As Councils' Proforma
Public transport journey time to City Centre			As Councils' Proforma
Distance: cycling to City Centre			As Councils' Proforma
Distance: Railway Station	How far is the site from an existing or proposed train station?		As Councils' Proforma
Access	Will it provide safe access to the highway network, where there is available capacity?		As Councils' Proforma
Non-car Facilities	Will make the transport network safer for public transport, walking or cycling facilities?		As Councils' Proforma



denotes a change from the Councils' Proforma assessment.

4.2 This SA Proforma, when compared to the New Settlement site options is conclusive that Cambridge South is much more sustainable and LIH and Pigeon contend that parts of Cambridge South could be released without undue harm to Green Belt purpose.

Conclusion

5.1 The evidence base for assessing the reasonable alternative site options on the Edge of Cambridge is based on the two Green Belt assessments. We have shown the assessments to be contradictory, not comprehensive and the status of each document is unclear. This is neither a robust or consistent evidence base on which to base important decisions on the reasonable alternative site options.

5.2 The Councils do not give a threshold of the value of importance to the purpose of the Green Belt above which a site is automatically dismissed as a reasonable alternative.

5.3 The SA Addendum does not take any account of the likely significant effect on Climate Change of additional vehicle movement (greenhouse gases and use of fossil fuels) dispersed development will bring. This does not comply with the requirements of paragraph 84 and 165 of the NPPF.

5.4 There are inconsistencies between the SA Addendum assessment of Edge of Cambridge Sites and the New Settlements with biased advantage to the New Settlement options. This does not comply with paragraph 84 of the NPPF.

5.4 The Local Plan strategy is based on these omissions and inconsistencies and therefore does not comply with paragraph 85, 93 and 99 of the NPPF.

5.5 The protection of the Green Belt is given extremely high importance, in most cases more than all the other dimensions of sustainable development. It is not clear what the weighting of the components of sustainability are. There is no justification as to why the protection of Green Belt is considered more important than the effects of the strategy on climate change which is central to sustainable development. The SA fails paragraph 84 of the NPPF.

5.6 The modifications proposed do not comply with the requirements of paragraphs 84, 85, 93 and 165 of the NPPF.

Reference 1: Development Strategy Update November 2015

Paragraph 4.20: *“In response to the Inspectors’ Letter, the Councils have prepared new evidence, including an independent review of the Inner Green Belt boundary and the Sustainability Appraisal Addendum 2015. These consider afresh the merits of development on the edge of Cambridge, including sites that assessments show would cause significant harm to Green Belt purposes. These are considered on a like for like basis with development options elsewhere in the sequence, including new settlements. Therefore the consequences of development outside the Green Belt have been compared with the consequences of further development in the Green Belt. This ensures and demonstrates that the Councils have complied with paragraph 84 and 85 of the NPPF in considering the implications of Green Belt on sustainable patterns of development and reach sound conclusions”.*

Reference 2: 2012 Inner Green Belt Boundary Study (RD/STRAT/210)

The SA Addendum is clear that *“development on the edge of Cambridge remains the best performing option with regard to modal share and performs positively due to short distances to the city, low public transport journey times, and in many cases proximity to high frequency public transport.....The Local Plans CSRM report found that the greater distance from Cambridge would mean higher levels of car use than and edge of Cambridge focus.....”* Page 50 and 51).

Reference 3: Cambridge Inner Green Belt Boundary Study November 2015 Paragraph 4.11.8

“From the M11, there is a short stretch of open countryside before the distinctive urban gateway of the ongoing development at Trumpington Meadows, Glebe Farm and Trumpington, and there are views to the historic village core. The character of the route is then green and treed up to Vicar’s Brook and the Botanic Garden, where the urban gateway to Cambridge occurs. Before this point, the approach does not feel strongly urban because there are mature trees and tall hedges on both sides of the road, the houses are set back from the road on the eastern side and there is the occasional glimpse across fields and the golf course to the west. The gateway to Distinctive Cambridge is at the double roundabout with Fen Causeway and Lensfield Road, which defines the edge of the historic core. This approach is of particular note because the gateway to Distinctive Cambridge is very close to the second urban gateway, enhancing the perception of Cambridge as a compact city.”



Appendix 4



Response to Consultation on Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans

Executive Summary

This report considers whether the Sustainability Appraisal Addendum and proposed modifications to the Cambridge and South Cambridgeshire Local Plans with reference to transport are sound as defined by NPPF.

Reference is made to the potential implications of the major transport infrastructure required to support the new settlements within the SA Addendum, following this omission being identified during the previous Matters' Hearings. However, the potential negative impacts on the Green Belt which are indicated in the SA Addendum Report are not then taken into account in the scoring within the SA Addendum pro-forma for the new settlements.

Unless this transport infrastructure would be delivered in the event that the new settlements do not come forward, which is considered very unlikely given the inter-relationship between them and a potential funding gap even allowing for significant developer contributions, it would be reasonable to consider that this infrastructure is a fundamental part of the new settlement strategy. In not taking account of the full impacts on the Green Belt, an inconsistent approach has been taken in considering potential impacts of alternative development options.

Further review of the SA Addendum has identified a number of inconsistencies / inaccuracies in the appraisal of transport criteria, including cycling and walking connections and proposed access arrangements, which suggest that the sustainable transport links and potential benefits associated with the Cambridge South site have not been fully considered.

The Proposed Modifications Joint Consultation Report, which identifies the proposed modifications and evidence base, makes a number of statements in support of the implementation of a new settlement strategy, rather than one with more of a focus on the edge of Cambridge which do not stand up to scrutiny. These include apparent inaccuracies in the transport infrastructure required for edge of Cambridge sites, a proposed strategy not making the most of existing infrastructure and an overemphasis on the potential sustainable transport credentials of the new settlements. The updated transport modelling does not appear to take into account the provisional allocation of land at E1/B, while the grouping of different edge of Cambridge sites does not allow a proper understanding of the benefits or impacts of individual sites and, therefore, reasonable potential alternative areas of growth have not been appropriately considered.

There are therefore a number of areas of concern with the methodology and subsequent interpretation of the work undertaken to support the Sustainability Appraisal Addendum and also the identification of the proposed modifications to the Local Plans. These concerns raise serious questions about the soundness of the modifications.

It is noted that the modifications proposed are relatively minor and the Councils have indicated that the revised evidence base continues to support the general new settlement growth strategy proposed. It is our opinion that the revised evidence base does not address the fundamental issues which have been previously raised regarding the soundness of the Local Plans and continues to fail to make a compelling argument for the growth strategy being a sustainable one in transport terms.

1. Introduction

- 1.1. This report has been prepared to consider whether the proposed modifications to the Cambridge and South Cambridgeshire Local Plans and the Sustainability Appraisal Addendum (SA Addendum), with reference to transport, are sound, as defined by NPPF. The SA Addendum and modifications are supported by a range of further studies the Councils have undertaken or commissioned to update or review the evidence base as part of this process and to respond to the comments raised in the Inspector's letter of 20 May 2015 (RD/GEN/170), which suspended the Examination in Public. This includes undertaking additional transport modelling and updating the Infrastructure Delivery Study.
- 1.2. The scope of the consultation has been narrowly defined with only the proposed modifications, as set out in the Proposed Modifications Joint Consultation Report and the SA Addendum to be consulted upon. It is noted that the information presented as part of the original formal consultation on the Local Plans in 2013, remains in front of the Inspectors, and it is assumed that this is also the case with the written and verbal representations made as part of the various Matters' hearings during 2014/15.
- 1.3. It is noted that the modifications proposed are relatively minor and the Councils have indicated that the revised evidence base continues to support the general new settlement growth strategy proposed. It is our opinion that the revised evidence base does not address the fundamental issues which have been previously raised regarding the soundness of the Local Plans and continues to fail to make a compelling argument for the growth strategy being a sustainable one in transport terms. While we have considered the key points with regard directly to the SA Addendum and the proposed modifications as part of this note, we consider that the revised evidence base continues to fail to address key issues raised during the previous Matters' Hearings, and that there remains a requirement for this to be reviewed and considered in more detail as a whole as part of any future Matters' hearings to ensure the soundness of the Local Plans.

2. Sustainability Appraisal Addendum

- 2.1. A review of the SA Addendum has identified a number of inconsistencies and inaccuracies with regard to the consideration of the alternative sites with regards to transport.

Consideration of Impact of Major Infrastructure on Green Belt

- 2.2. The overall planning strategy, including the modifications, places great importance on the impact of the Green Belt in the determination of sites which are considered appropriate to allocate for development. During the representations at the previous Matters' Hearings, it was noted that the SA did not take into account the potential impacts on the Green Belt of the major transport infrastructure which had been identified as being required to support the proposed new settlements.

- 2.3. The SA Addendum makes reference to the potential implications of the major infrastructure provision required to support the new settlements at Waterbeach and Bourn / Cambourne, within the Green Belt assessment category. It is recognised in the assessment of the various potential Waterbeach allocations that:

“Bus priority measures, Park & Ride, cycling and pedestrian improvements, and highways improvements on the A10 corridor, planned to secure wider benefits would also be required to serve this site. Landscape impacts are uncertain at this stage. A busway using the Mereway route would have significant negative landscape impacts. There are potential negative impacts on Green Belt.”
(Page 36-37 Appendix B-3)

- 2.4. Despite this, the Waterbeach site and those on the A428 corridor are scored as Green when considering Green Belt impacts, which is defined as “No impact or Minor Positive impact on Green Belt purposes.”
- 2.5. The accompanying notes in the SA Addendum Report indicate that it is considered necessary to assess the environmental impacts of the associated transport schemes when considering the new settlements. They however go on to say that this is done on a precautionary basis since improvements are considered necessary to address existing issues and are not considered to be solely proposed as a result of the new developments. The report notes that the effects of these schemes are assessed as part of the LTP3 Strategic Environmental Assessment (LTP3 SEA) and appropriate mitigation measures suggested within that assessment.
- 2.6. However, as indicated above, while the individual site appraisals refer to the potential implications on the Green Belt of the transport infrastructure identified as necessary to deliver development, this does not then appear to have been carried forward into the scoring of the impact on the Green Belt for the new settlements within the SA Addendum.
- 2.7. It is not clear within the LTP3 SEA what appropriate mitigation measures have been proposed to offset the potential impacts on the Green Belt of the proposed major transport infrastructure. This is unsurprising given that much of the infrastructure appears to have yet to be considered beyond a very initial stage.
- 2.8. It is our opinion that the infrastructure improvements are a fundamental part of the new settlement strategy and should be considered as such. Reinforcing this point is the 2015 Infrastructure Delivery

Study (IDS) (RD/MC/080), which identifies in excess of £850,000,000 of transport infrastructure across the two districts to support future growth, with a maximum of £500 million available through the City Deal. The City Deal funding is intended to help to stimulate additional growth and is therefore presumably provided on the basis that it will help to deliver the new settlements. Only £100 million of City Deal money is in fact guaranteed at this stage, while Tranche 1 City Deal priority projects costing in excess of £180 million have been agreed by the City Deal Executive Board.

- 2.9. Given concerns of shortfalls in funding, the IDS recommends prioritisation of transport schemes on the Ely to Cambridge (A10) and St Neots to Cambridge (A428) corridors to support the delivery of planned growth. The associated schemes are identified to cost in excess of £360 million. The IDS includes allowance of potential S106 contributions from the new settlements to support the delivery of the strategic transport corridors of between £84m and £155m. It is worth considering that the IDS indicates that only two schemes on these priority corridors are identified as Tranche 1 City Deal priority projects, with a combined cost of less than £48 million. This raises further issues of a funding gap, while suggesting increased pressure on developer contributions.
- 2.10. Given that it has been suggested that the improvements are not solely proposed as a result of the new developments (SA Addendum Report, Footnote 95 page 114 and RD/MC/060, Para 4.56 page 37), we would seek clarification from the Local Authorities that the proposed infrastructure improvements would be delivered in the event that the new settlements do not come forward.
- 2.11. Otherwise, this would indicate that the full impacts on the Green Belt have not been appropriately considered for the New Settlement, suggesting an inconsistent approach has been taken to the consideration of the potential impacts of alternative development options, which would be contrary to the Local Plans being considered as Justified.

Consideration of Transport within SA Addendum Proforma

- 2.12. Considering the SA Addendum further, and in particular relating to the Cambridge South Mixed Use site (CCSC1004), there are a number of other apparent inconsistencies / inaccuracies in relation to the appraisal of transport.

“Proposer identifies vehicular access from Hauxton Road midway between M11 roundabout and Addenbrooke’s Access Road.” (Appendix B2 - Page 231)

- 2.13. This has never been the case and there appears to have been some confusion between this and the proposed access onto Addenbrooke’s Road. This is particularly surprising given that the Cambridge Sub-Regional Model (CSRM) Modelling Report (RD/MC/070) has assumed that broad location BL5, which it is believed is intended to reflect the CCSC1004 site, would be accessed from Addenbrooke’s Road and Cambridge Road. On the other hand, the proposed new arm from M11 J11 which is the third access point identified as part of the development proposals is not included within the modelling, despite this forming a key part of the delivery of the proposed access strategy of the site designed to help to relieve existing traffic pressure on key links / junctions within the Southern Fringe. It is noted that despite not fully recognising the proposed access strategy or the potential benefits this could bring, the site scores Amber for Access, indicating a belief on the part of the local authorities that any negative effects could be mitigated. This position is reaffirmed by the Highways Agency (now Highways England) comments on the site.

- 2.14. In turn, the lack of understanding of the proposed access strategy appears to have resulted in some confusion as to whether the site abuts the highway at Addenbrooke's Road. It does and the development proposals involve connecting to current and providing enhanced, crossing facilities on Addenbrooke's Road, ensuring strong walking and cycling connections to Addenbrooke's Hospital, CBC, Trumpington Park & Ride and Cambridge City Centre, amongst other potential destinations. The connections available would appear to justify a stronger rating for cycle routes than the Amber CCSC1004 is currently scored.
- 2.15. The project team are not aware of the accommodation bridge over the railway on the southern aspect of the site which is referenced in the appraisal. However, as has been previously identified to the authorities, the Proposers' will be happy to work with the relevant authorities to ensure suitable and appropriate cycle and walking facilities are delivered as part of the development.
- 2.16. The proposed site has also been scored as Amber in terms of High Quality Public Transport (HQPT). The definition of HQPT as set out in the Transport Strategy for Cambridge and South Cambridgeshire is incredibly onerous, to the extent that the Trumpington Park & Ride, which is within a short walk (approximately 650m) of CCSC1004, is not considered to offer a HQPT service as, despite exceeding the majority of the criteria, there is a reduction in services provided on weekday evenings after 2130 and Sundays after 2000.
- 2.17. Nevertheless, there does however appear to be some inconsistency in the scoring of the HQPT category for individual sites. Site CC904, which is adjacent to CCSC1004, is identified as scoring Green for HQPT. However, as well as being located further from Trumpington Park & Ride than CCSC1004, the nearest major alternative source for high frequency bus services is Addenbrooke's Hospital Bus Station, which is over 2km from CC904, a distance which would not be expected to contribute to the attaining of a HQPT score. It would therefore be unexpected for CC904 to score more highly than CCSC1004 in this category and clarification is therefore requested as to the reasons for CCSC1004 being classified as Amber and CC904 as Green for HQPT.

3. Proposed Modifications Joint Consultation Report

- 3.1. The Proposed Modifications Joint Consultation Report (December 2015) provides an overview of the work which has been undertaken following the suspension of the EIP and identifies the subsequent modifications proposed to the Local Plan.
- 3.2. The report summarises a range of evidence documents in justifying the proposed modifications while maintaining the overall development strategy of growth primarily focussed on new settlements. This is principally covered in paras 2.18 to 2.21. There are a number of statements made in these paragraphs which require further consideration.
- 3.3. Para 2.18 indicates that the Councils have been clear that they recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation. It then goes on to say that edge of Cambridge developments would have their own transport issues and are not necessarily cheap to deliver. This position appears to be based on a section of the Development Strategy Update (RD/MC/060):

“Significant development on the edge of Cambridge would not necessarily be a cheap option in terms of transport infrastructure. They would be placing potentially very large developments, generating large numbers of vehicle movements, at a specific point in the city’s transport network, and there are existing congestion issues on all the radials into Cambridge. Transport modelling considered the infrastructure needed for the major sites being promoted through the Local Plans, and identified that significant new road infrastructure would be required in most cases, often more than being suggested by the promoters. Comparisons can be made with permitted development on the southern fringe, where significant transport improvements were needed to enable development now under construction. This included the new Addenbrooke’s Access Road at a cost of £25.5m and the construction of the southern section of the Guided Bus which cost £40m. As a comparison with the new settlement strategic transport costs, the County Council estimates that a strategic link road to the south east of Cambridge from Fulbourn Road to Addenbrooke’s Road to serve strategic level development in this area would be likely to cost in the order of £45-60million including junction improvements.” (RD/MC/060, Para 4.60)

- 3.4. There are a number of issues with this paragraph. It is not clear how or at what stage analysis has been undertaken of additional infrastructure to support the alternative sites being promoted, nor at which sites significant transport improvements are considered to be necessary. Investigating further, the revised CSRM Modelling Report suggests that mitigation for the group of site BL3, BL4 and BL5 located in the Southern Fringe would include:

“a link through the site between Yarrow Road and Addenbrooke’s Road providing a better connection from the site to the M11”.

- 3.5. It is not clear how this could be considered necessary given that each of the sites is located adjacent to Hauxton Road / Trumpington Road, itself a corridor linking directly to the M11 at Junction 11. The Yarrow Road / Addenbrooke’s Link (which it is understood is an alternative reference to the road identified as potentially costing £45-£60m in RD/MC/060), would not be expected to enhance the accessibility of any of these sites to the M11.

- 3.6. As has previously been identified by the promoters of CCSC1004, along with the site's excellent accessibility by active travel modes, the site access strategy for the proposed development is designed to reduce pressure on key highway pressure points near the site. The necessary infrastructure could be delivered as part of the development, without affecting the ability to provide suitable levels of affordable housing.
- 3.7. It is also considered slightly surprising that the Guided Bus and Addenbrooke's Road are held up as an example of the potential negative implications of developing in the southern fringe. While delivery of these was not without its own issues, both of these major elements of infrastructure have already been delivered. The importance of this is two-fold:
- NPPF Para 32 requires that "Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure." These two elements of infrastructure have already been delivered and, to be consistent with national policy, consideration should be given as to how to make the most of these two assets, rather than identifying them as a reason for not developing in the area or for committing to significant additional infrastructure.
 - For development in the Southern Fringe, by making the most of existing infrastructure there would not be the additional risks, timescales or potential adverse impacts which are associated with the significant new transport infrastructure identified as necessary to support the new settlements for development.
- 3.8. Para 2.19 indicates that the evidence concludes that new settlements can provide:
- "viable and deliverable developments that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, attracting significant levels of patronage, and also provide wider benefits to existing communities."*
- 3.9. Although a well-trodden argument, there remains little evidence provided in the CSRSM modelling report for this position, with Figure 5-13 indicating that despite the significant infrastructure spending proposed, development at Bourn Airfield and Waterbeach would have a public transport mode share (including allowance for park & ride) of around only 6%-8%. By comparison, three of the Edge of Cambridge Broad Locations are forecast to achieve 8%, without the same level of intervention identified for the new settlements. This is also in the context of new settlements which are also likely to be relatively unattractive for walking and cycling trips (despite allowances for short internal trips), particularly when compared to edge of Cambridge sites, where walking / cycling to key destinations within Cambridge would be considered a more viable alternative to public transport, due to the shorter distances involved to Cambridge and other key destinations.
- 3.10. Para 2.20 then compares the relative merits of Edge of Cambridge and New Settlement sites in 5 categories before noting that having weighed these factors up, the Development Strategy Update document concludes that the strategy in the submitted plans, with limited modifications, is the right balance for this plan period. While acknowledging that the Councils would consider the relative weighting to give each different category, Para 2.20 suggests that of the 5 categories, it is only in

terms of Green Belt / Landscape / Townscape that the New Settlements are suggested to have a particular advantage, and for reasons given above and in the review of the Green Belt Assessment undertaken on behalf of Lands Improvement Holdings and Pigeon Land, this is not considered to be wholly accurate.

- 3.11. With regards to any additional or extended sites which have been identified as potentially coming forward as part of the modifications to the Local Plans, it would be expected that this should be supported by a suitable and robust evidence base, including appropriate transport modelling. This modelling would also be expected to have considered all other appropriate alternatives on their relative merits, so that an informed decision could be reached. Both of these points are important when considering if the Local Plans have been Positively Prepared and are Justified.
- 3.12. It is not clear whether the additional growth at Cambridge Biomedical Campus (E/1B) has been directly considered at any stage within the CSRM Modelling Report (RD/MC/070), despite this subsequently being identified as a provisional allocation within the Local Plans' modifications.
- 3.13. On the other hand, while additional consideration has been given to potential growth in the Cambridge Fringe, rather than considering each site on its own merits, an approach has been taken to group different development areas within the Fringe together. The justification for the groupings is unclear. The group of sites identified as 'Green belt South Radial' in Table 5-2 and Figure 5-4 of RD/MC/070 includes not only three prospective developments in the Trumpington area, including the Cambridge South site (CCSC1004 / BL5) but also further development in the form of BL9, which is located to the north of Newmarket Road in the east of Cambridge.
- 3.14. The grouping of sites in this way, particularly where this grouping appears to have almost been randomly undertaken, does not allow a proper understanding of the benefits or impacts of the individual sites, meaning that reasonable potential alternative areas of growth have not been appropriately considered.

4. Summary

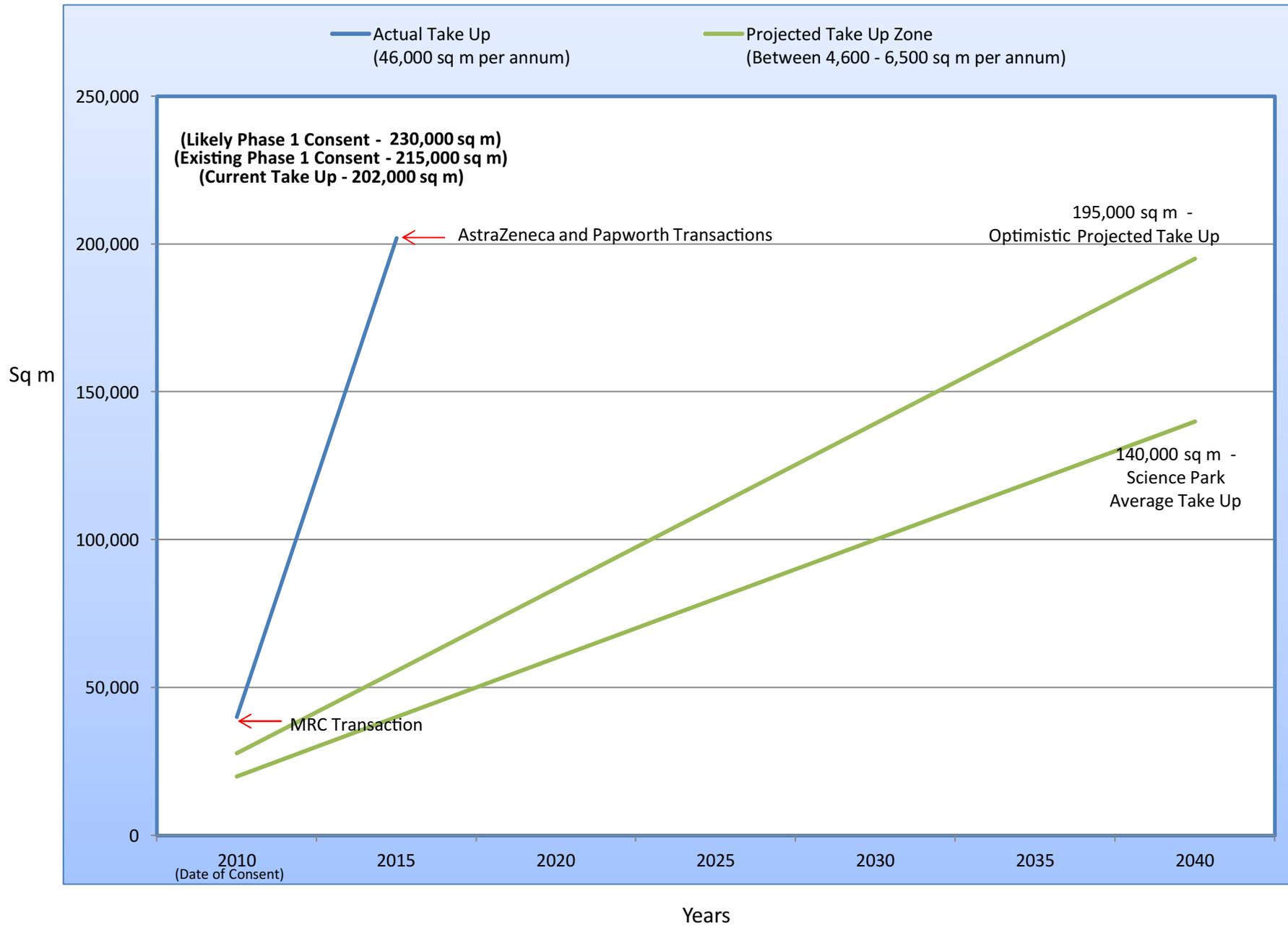
- 4.1. The analysis presented above identifies a number of areas of concern in the methodology and subsequent interpretation of the work which has been undertaken to support the Sustainability Appraisal Addendum and identification of the proposed modifications to the Local Plans, which would question the soundness of these.
- 4.2. While not all aspects are explicitly covered in detail within this report given the scope of this consultation, our review of the work undertaken to support both the SA Addendum and proposed modifications indicates that the Councils have not addressed clearly a number of concerns raised during the previous Matters Hearings including:
- Proper consideration of alternatives to the proposed growth strategy;
 - The funding and deliverability of proposed transport infrastructure or reasonable alternatives;
 - The appropriateness and effectiveness of this infrastructure to underpin the proposed growth strategy; and
 - The unsustainable nature of the proposed new settlements.
- 4.3. We therefore consider that the overall Local Plans' strategy remains unsound.



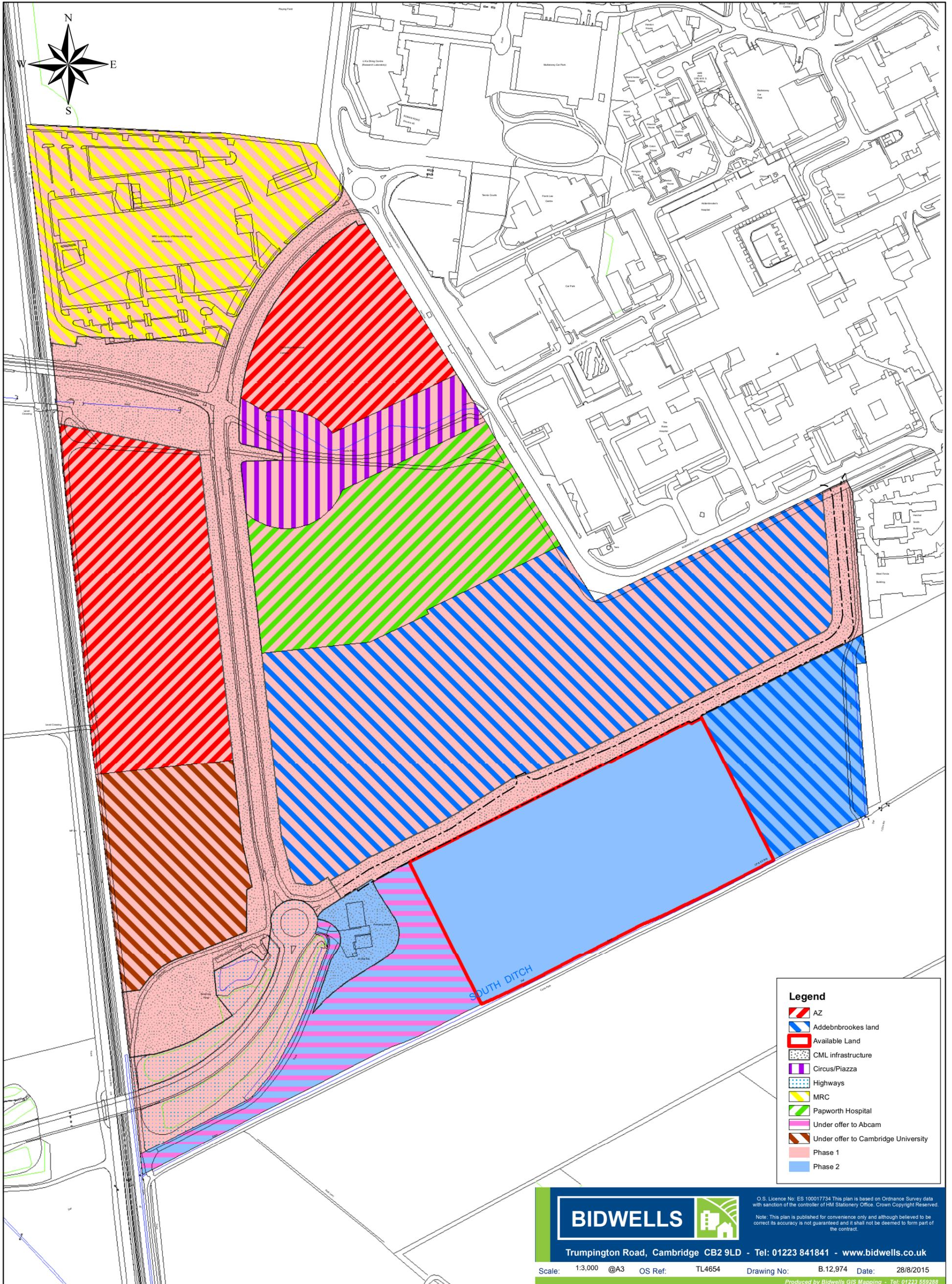
Appendix 5



Anticipated Take Up Rate Compared to Actual Take Up Rate Cambridge BioMedical Campus (Phase 1)



Cambridge Biomedical Campus Phase 1 & 2 (Land take up)





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