



## **Independent Examinations**

**Cambridge City Council and South  
Cambridgeshire Local Plan**

**MCC1B/5189**

Matter CC1B - Open Space and Natural  
Environment

**Rep 26737**

**Trinity College (5189) Rep no 26737**

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## Matter 1B.1

### Issues

- 1.1 Does the Plan adequately set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure as required by paragraph 114 of the Framework?**
- 1.1.1 The Plan does not adequately take account of the requirement for the NPPF to be 'taken as a whole' (paragraph 6). Whilst Draft Policy 67 responds to paragraph 114, it fails to respond to the requirement of the NPPF at paragraph 154 for 'Local Plans to be aspirational but realistic' with the draft policy being too restrictive and not taking account of the requirement of the Framework to ensure that Plans are deliverable (paragraph 173).
- 1.2 i. Policy 67: The Council's Open Space and Recreation Strategy and the Cambridgeshire Green Infrastructure Strategy were both prepared in 2011 having regard to then extant Planning Policy Guidance 17: Planning for open space, sport and recreation which pre-dated the Framework. Nonetheless, does the Council consider that the documents are consistent with paragraph 73 of the Framework which requires that planning policies should be based on robust and up-to-date assessments of the needs for open space and sports and recreation facilities?**
- 1.2.1 Paragraph 158 of the NPPF makes clear that local planning authorities should ensure that Local Plans are based on adequate, up-to-date and relevant evidence and this is reiterated specifically with regard to open spaces by paragraph 73.
- 1.2.2 The Council's Open Space and Recreation Strategy cannot be considered robust in accordance with the requirements of paragraph 73 due to the criteria and quality scoring which the strategy uses to identify the recreational and environmental important areas of open space being flawed and biased as some criteria are duplicated (i.e. where trees also make up the boundary treatment of a site); while others are irrelevant to the quality of the space, such as 'litter bins', which is not relevant to the recreational or environmental importance of sites.
- 1.2.3 The quality score tries to quantify quality. However, it takes only those qualities which are applicable for scoring. Therefore, if a site had only one applicable quality – litter bins for example and had a score of five "numerous for the size of site and in good condition" the Quality Score would be 100%. The quality score is meaningless and cannot be used to compare or assess sites.
- 1.2.4 The 2011 Open Space Strategy is based on the guidance and typologies as set out in PPG 17 and the assessment methodology is based on the Companion Guide to PPG 17. The author understands the 'Quality Assessment' undertaken by the Council equates to the grounds maintenance assessment as set out in the Companion Guide to PPG 17, and which is a tool for formal amenity open space to identify possible areas of enhancement. It is not for assessing whether the site makes a major contribution to character and environmental quality.
- 1.2.5 Cambridgeshire Green Infrastructure Strategy does not identify specific needs or the quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities as required by paragraph 73.

**1.3 ii. Policy 67: Is the policy too onerous in relation to the proximity requirement for replacement open space?**

1.3.1 This requirement does not respond to the need for Plans to be aspirational but realistic (NPPF paragraph 154) as set out above and also fails to acknowledge paragraph 10 of the NPPF which sets out that plans need to take local circumstances into account, so that they can respond to the different opportunities for achieving sustainable development in different areas.

1.3.2 Given the built form of Cambridge, it is unrealistic that any re-provision of open space will be able to be relocated within 400m of the original site therefore making the policy undeliverable which is also contrary to the requirements of paragraph 173 of the Framework.

1.3.3 Additionally, the requirements of draft policy 67 are not in accordance with paragraph 74 of the NPPF which requires that "the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a sustainable location". As drafted, policy 67 does not meet the requirements of the Framework and cannot therefore be considered to be in accordance with this.

1.3.4 The draft policy therefore needs to be amended to allow some flexibility in the consideration of development proposals. The current policy wording is a blight on good and appropriate development opportunities for the city. The policy should allow sensible development that will bring positive impacts to Cambridge.

**1.4 iii. Policy 67: Is the inclusion of the term "educational need" in the 3rd paragraph of the policy overly restrictive? Is its inclusion necessary or should it be clearly defined? Should any definition include student accommodation?**

1.4.1 The inclusion of this term unduly limits development within sites. For example, within College or school grounds additional development legitimately required in order to support these educational facilities may not be strictly educational in nature, this could include student accommodation but also administrative functions or complimentary facilities such as galleries and theatres, but essential for the continued efficient and effective operation of these facilities. Such developments would be contrary to draft policy 67 as currently drafted which would unduly and unnecessarily restrict such developments.

1.4.2 It is therefore considered that the terms educational should be removed as any definition will act as a restriction to the development of a wide range of ancillary facilities, which is not limited to student accommodation, which are necessary to facilitate the continued exceptional educational offer within the city of Cambridge.