

Cambridge City Local Plan Examination

Matter CC1A Policy 8 – CCLP Setting of the City

Statement by Boyer on behalf of RLW Estates

i. Should the footnote 7 refer specifically to the most up to date Green Belt review document?

- 1.1 In the first instance, it is of note that Policy 8: criterion (a) specifically states that developments on the urban edge will only be supported where they respond to, conserve and enhance the landscape setting, approaches and special character of the city, in accordance with Green Belt assessments and their **“successor documents.”**
- 1.2 In theory, therefore this can be taken to include the subsequent and most up to date Green Belt review documents.
- 1.3 However, as there is an opportunity to amend this footnote, for completeness and to avoid confusion it is considered that the footnote should be amended to reflect this, and specifically that reference should be added to the following relevant documents:
 - Cambridge Inner Green Belt Boundary Study (November 2015)
 - Cambridge Inner Green Belt Boundary Study (November 2015) Supplement – March 2016

ii. Does criterion (a) accord with the provisions of Policy 4 of the Plan in terms of the requirements for development in the Green Belt? In this regard, should the policy draw a distinction between proposals for development in the countryside and proposals within the Green Belt given the substantial weight that the National Planning Policy Framework (the Framework) accords to harm to the Green Belt?

- 2.1 Whilst we generally support Policy 8, we are concerned with the manner in which the policy, including criterion (a), has been framed as set out in our representations at pre-submission stage.
- 2.2 In particular, as currently drafted, there is no apparent differentiation in this criterion (or indeed the policy as a whole) between how the policy would be applied to Green Belt and non-Green Belt land.
- 2.3 Indeed, as currently drafted the policy does not appear to explicitly reinforce the need to protect the Green Belt around Cambridge as a matter of principle. It is of particular concern that it is implied that sites will be judged on their merits according to the degree to which they conserve the setting of the city.

- 2.4 It is essential to recognise that the Green Belt has been defined to safeguard the established purposes of the Green Belt, as set out in the NPPF, and applied specifically to the circumstances of Cambridge, including preserving the setting and special character of this historic, compact city. Any release of Green Belt land or any inappropriate development within it would therefore conflict with such objectives. In its current form, there is a danger that Policy 8, including criterion (a), could serve to undermine Green Belt policy through the introduction of a criteria-based policy which implies the acceptability of development in principle.
- 2.5 It is recognised that the policies in the Plan should be considered as a whole and that therefore a logical conclusion could be reached that this does not necessarily conflict with the overriding restraint on development within the Green Belt, except in very special circumstances.
- 2.6 It is however felt that some clarification is required in this regard, either through cross-referencing to Policy 4 in the context of Policy 8 or more directly outlining that the provisions apply only to sites not designated as Green Belt, or where consideration against the requirements of Policy 4 has already been undertaken and confirmed the existence of the required very special circumstances. It is considered that this would help to reinforce the fact that Policy 8 should not be applied in isolation, and must be read alongside Policy 4.

iii. Is the wording of criterion (a) too prescriptive in terms of development on the urban edge? Is the criterion out of step with paragraph 58 of the Framework which requires that whilst development should respond to the character, identity and history of the local surroundings this should not prevent appropriate innovation?

- 3.1 The NPPF notes that it has been designed to enable local tiers of policy makers to produce their own distinctive local and neighbourhood plans, in line with national policy.
- 3.2 Whilst it is necessary to provide developers with scope for innovation, it is also important for local policy to be written in a manner which reflects local circumstances, with Paragraph 58 indeed recognising that **“such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.”** In the case of Cambridge City’s Local Plan, it is important to note the significance of Cambridge as a historic and compact city. There is therefore a need to reflect these distinctive local characteristics in the policy requirements.
- 3.3 It is considered that the wording of criterion (a) appropriately represents these key strands of Paragraph 58 in referencing the need to respond to, conserve and enhance the landscape setting, approaches and special character of the city.
- 3.4 It is agreed that innovation should not be prevented or discouraged, however this needs to be viewed in context. Furthermore omission of any reference to innovation is not considered to be in conflict with this aspect of Paragraph 58, given that lack of explicit mention of this term in itself could not be seen as either preventing or discouraging innovation. It should also be remembered that it is unnecessary for local policy to simply repeat national policy. In this regard Planning Practice Guidance notes that “There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.” (Paragraph: 010 Reference ID: 12-010-20140306).

- 3.5 It is not therefore considered that criterion a) is too prescriptive, and if anything would benefit from greater clarity in respect of how this should be applied to Green Belt and non-Green Belt land, so as to ensure that the in-principle aspects of the former are not overlooked.

iv. Should criterion (a) also make specific reference to conserving and enhancing important views of the city and its skyline so as to align with policy 60?

- 4.1 It is evident that Policy 60 in respect of tall buildings and the skyline of Cambridge will be a valid consideration for developments in fringe locations exceeding 13m in height, in which case the relevant criteria will be applied.
- 4.2 Notwithstanding this it is felt that more explicit reference to conserving and enhancing important views of the city and its skyline more generally should be included within criterion a) of Policy 8. Whilst it could be inferred that such consideration would apply through reference to **“approaches”** and **“special character,”** drawing out these specific elements would help to further strengthen the policy by better defining these important issues regardless of the height of development, given the sensitivity of the city’s setting.

Boyer
April 2016

Cambridge City Local Plan Examination in Public

Hearing Statement on behalf of Defence Infrastructure Organisation/Urban and Civic (Co-Respondent 5349)

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Matter CC1A: Policy 8 Setting of the City

1. This statement is submitted on behalf of Defence Infrastructure Organisation (DIO) and Urban&Civic (U&C), pursuant to representations made on the proposed submission Cambridge City Local Plan (co-respondent reference 27669). It is submitted to support the separate statement submitted by Boyer on behalf of RLW Estates, with whom the original representations were made.
2. In particular, U&C reiterate that the following amendments should be made to Policy 8:
 - update Footnote 7 to refer to the most up to date Green Belt review documents, comprising the Cambridge Inner Green Belt Boundary Study (November 2015) and its supplement (March 2015);
 - amend Policy 8 text to make clear the distinction between Green Belt and non-Green Belt sites, and the imperative to safeguard the established purposes of the Cambridge Green Belt, either through clear cross referencing with Policy 4 or through the inclusion of specific text; and
 - include more explicit reference to conserving and enhancing important views of the city and its skyline within criterion (a.) of Policy 8.