



## Cambridge City Local Plan Examination

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### **Matter CC1 – Heritage Policies – Protecting and Enhancing the Character of Cambridge**

#### **CC1A – Design and the Historic Environment**

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##### **Issue 1A.2 - Policy 8: Setting of the City (Tuesday 14 June 2016)**

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

- 1.1 No, footnote 7 should not refer specifically to the most up-to-date Green Belt review document (RD/MC/030), nor to the Supplement (RD/MC/031). Reference to previous Green Belt reviews and other background documents should also be removed from this policy.
- 1.2 This footnote incorporates the listed references, and potentially the latest Review and successor documents, into policy as a basis for decision-making, but they were not written for this purpose and consequently do not contain an appropriate and clear basis to assist interpretation of this criterion or decision-making. In so far as they may contain some relevant information, the role of these documents should be only as an evidence base to inform policy-making and the allocation of land for development. Where they indicate matters relevant to decision-making, these should be expressed in policy within the statutory development plan and be justified on that basis.
- 1.3 As explained in our Matter PM2 Statement, the Cambridge Inner Green Belt Boundary Study prepared by LDA Design (RD/MC/030) fails to present a comprehensive document based on a sound methodology. Representations by CEG to the Proposed Modifications consultation (see for example representations ref 65996 and 65998) and comments set out in CEG's Matter PM2 Statement explain why the latest LDA Review does not provide the Local Plan with a sound basis for amendments to the Green Belt, and why it fails to adequately address the Inspector's initial concerns over the original Council assessment that underpinned the original Submission Draft Plan. In fact, the LDA Design Inner Green Belt Boundary Study gives rise to a number of fresh concerns. These are listed in detail in the CEG response to the modifications consultation (see for example representations ref 65996 and 65998) but include, for example, that the LDA Study introduces a number of criteria for the assessment which are not relevant to the Green Belt purposes and not consistent with National Planning Policy. To refer to this Review would not therefore assist the soundness of the policy or its implementation.

- 1.4 Further, to refer broadly to ‘successor documents’ introduces the real risk that future studies and reviews which have not been through appropriate scrutiny and examination processes will also become part of a flawed decision-making framework.
- 1.5 CEG consider the inclusion of reference to the Green Belt in this policy is unnecessary and unjustified as these matters are addressed by Policy 4 and by the NPPF. In fact, Policy 8 is considered entirely unnecessary as it duplicates provisions found in policy elsewhere in the plan. This concern, and a similar view on the other setting related criterion within the policy, is discussed in more detail in the response to part ii) below.
- 1.6 CEG therefore conclude that footnote 7, and indeed Policy 8, should be deleted. In the event this view is not supported, the wording of the policy and footnote should be modified to recognise the status of the documents included and make it clear that additional documents will not be afforded additional status through this policy. A number of the documents referred to which are not directly relevant to the detailed consideration of Green Belt issues should also be deleted from the footnote.

**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?**

- 1.7 No, criterion (a) of Policy 8 does not accord with the provisions of Policy 4 in terms of the requirements for development in the Green Belt. The Policy should recognise the setting and context of the proposals to which it applies, which may be broader than the two scenarios outlined, including for example appropriate or ‘very special’ development in the Green Belt or allocated sites on the edge of the urban area removed from the Green Belt. This concern reinforces the view that Policy 8 presents an unnecessary conflation of considerations which are, or with minor modification could be, clearly addressed, separately, within other existing policies, specifically, Policies 4, 55 and 60 and the NPPF itself (there being no reason to replicate NPPF policies within Local Plans, according to PAS advice).
- 1.8 The requirement included in criterion (a) of Policy 8 which states development will only be permitted where it can demonstrate it “*responds to, conserves and enhances the landscape setting, approaches and special character of the city*” goes beyond the Green Belt purposes set out in the NPPF, including “*to preserve the setting and special character of historic towns*” and related tests, and unjustifiably seeks to introduce enhancement of the setting of Cambridge as a necessary requirement for proposed development within the Green Belt. This point was made by CEG under Matter 6.
- 1.9 When the wider context is considered, this confirms there is no justification for this policy to seek to impose, on all Green Belt sites, urban fringe sites and rural sites, a requirement to preserve and enhance the special character of the City. Many of these locations are some distance and visually separate from the

historic core of the City Centre and do not contribute to its setting, and much of the character of the suburban areas of the City which surround the historic core already do not contribute to its setting. It is noteworthy that the location of the 11 Conservation Areas within Cambridge City highlights a distinct clustering around the core and inner areas and not the suburbs. In addition, the Landscape Character Assessment, 2003 (RD/Strat/190) describes the industrial parks within the Industrial Road Corridors, which include sites on many main distributor roads into the City, as “*commonly of poor visual, environmental and landscape quality*” (Page 78). CEG therefore concludes this blanket policy is not justified, effective or consistent with national policy.

1.10 Further, there is no justification for Policy 8 to impose additional tests on development proposals on allocated urban edge sites which themselves are the subject of detailed policy considerations (for those allocations) and will, when allocated, have been through the examination process.

1.11 CEG suggests that the NPPF itself, or Policy 4 (which has not been subject to a hearing session), if amended in line with the comments above, would adequately address the requirement to protect the Green Belt from inappropriate development, and Policy 55 would address design quality and responding to context. To include the Green Belt within Policy 8 creates a conflation of two distinctly separate policies and this policy is therefore both unnecessary and unsound.

**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?**

1.12 Yes, the wording of criterion (a) is too prescriptive in terms of development on the urban edge and is inconsistent with National Planning Policy.

1.13 Paragraph 58 of the NPPF requires local authorities to develop “*robust and comprehensive policies that set out the quality of the development expected for the area*”. It further states policies should be based on “*stated objectives for the future of the area and an understanding and evaluation of its defining characteristics*”. Policy 8 as currently drafted is excessively prescriptive, including by reference to the Landscape Character Assessment 2003 (RD/Strat/190) and, through footnote 7, to the need to comply with the (sometimes conflicting) objectives and conclusions of the numerous Green Belt Reports (RD/Strat/170; RD/Strat/180; RD/Strat/200; RD/Strat/210). In fact, it is difficult to see how some recent development on the edge of the City could have come forward and been regarded as compliant with this policy. If retained, the policy should clearly define objectives in line with the aims defined in paragraph 58 of the NPPF which allow for innovation.

1.14 The Cambridge Landscape Character Assessment 2003 (RD/Strat/190) forms part of the City Wide Guidance and provides analysis of the character and setting of Cambridge, in general terms. It should be noted that, whilst a material consideration, the assessment does not form part of adopted Supplementary Planning Guidance. The role of the document is as background

information, to inform policy and guide development proposals. It does not provide guidance in relation to the acceptability of certain locations for development or conservation.

- 1.15 Additionally, it is noted that the policy is not supported by the evidence base, for example with the LDA Design Green Belt Assessment (RD/MC/030) strongly advocates “*urban gateways*” as the basis for defining Green Belt boundaries around new development, whilst the policy (at criterion (c)) seeks “*vegetated urban edges*”. There is a clear confusion as to the planning outcome that is sought by the Council’s policy approach in defining new Green Belt boundaries and its approach to setting of the city.
- 1.16 Overall, CEG concludes that the policy is not consistent with national policy, effective or justified by the evidence base. The policy should be deleted with the matters it seeks to cover addressed in Policy 55 (Responding to Context).

**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?**

- 1.17 No, Policy 60 (Tall Buildings and the Skyline in Cambridge) relates only to tall buildings and adequately addresses the conservation and enhancement of important views in the City.
- 1.18 Views of the city form part of its overall special character. This is supported by the analysis of the landscape character contained within the 2003 Cambridge Landscape Character Assessment,
- 1.19 It is unnecessary to add this additional reference within this policy.