WRITTEN STATEMENT FOR MATTER 9B

CAMBRIDGE EAST

NORTH BARTON ROAD LAND OWNERS GROUP

CAMBRIDGE CITY COUNCIL ID. 5336

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL ID. 21302

LOCAL PLAN EXAMINATIONS

CAMBRIDGE CITY AND SOUTH CAMBRIDGESHIRE

Carter Jonas

Incorporating Januarys

March 2015

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1. INTRODUCTION

- 1.1 This Statement has been prepared by Carter Jonas LLP on behalf of the North Barton Road Land Owners Group (North BRLOG) to the Local Plan Examinations for Cambridge City and South Cambridgeshire. North BRLOG comprises four landowners, as follows: Corpus Christi College, Downing College, Jesus College, and University of Cambridge. North BRLOG owns land to the North of Barton Road which is on the south western built-up edge of Cambridge. The site is currently located within the Green Belt. It crosses the administrative boundary between Cambridge City and South Cambridgeshire. In September and October 2013 representations were submitted on behalf of North BRLOG to both draft Cambridge Local Plan (Draft CLP2014) and draft South Cambridgeshire Local Plan (Draft SCLP); separate representation reports were prepared to address the specific policies and supporting text in each document.
- 1.2 In our representations to Draft CLP2014 and Draft SCLP we commented on the proposed identification of Cambridge East as safeguarded land; see representations to Policy 12 in Paragraphs 8.23 and 9.31 to 9.32 in our Representations Report to Draft CLP2014, and to Policy SS/3 in Paragraphs 9.14 and 9.51 to 9.52 in our Representations Report to Draft SCLP. There is some overlap between Matter 9B and Question 6iii of Matter 6 (Green Belt General Issues). In summary, we concluded that a proper assessment of safeguarded land had not been undertaken as part of any review of the Green Belt, and that the availability of Cambridge Airport for residential development during the plan period is uncertain, as such the site should not be identified as safeguarded land.

2. MATTER 9B – CAMBRIDGE EAST

As the land which has been safeguarded as a long term strategic reserve, as shown on the Policies Maps, is the subject of an adopted Area Action Plan, are there any overriding circumstances to justify its reinstatement to Green Belt land having regard to Paragraph 85 (4th bullet point) of the National Planning Policy Framework?

- 2.1 In our representations to Draft CLP2014 and Draft SCLP we did not suggest that Cambridge East should be reinstated to the Green Belt. The main criticisms in our representations were that there has been no assessment as to whether land at Cambridge East should be identified as safeguarded land, and no assessment of alternative or additional land that could be identified as safeguarded land to meet long term development needs.
- 2.2 The decisions about retaining the status of land at Cambridge East outside the Green Belt and as safeguarded land are based entirely on the policy approach set out in the Cambridge East AAP (adopted February 2008) with minor alterations. Paragraphs 3.16 of Draft CLP2014 and 3.25 and 3.26 of Draft SCLP confirm the intention to continue with the policies in the AAP. However, the policy approach contained in the AAP was based on the strategy from the Regional Planning Guidance for East Anglia (RPG6) adopted in November 2000, and the Cambridgeshire & Peterborough Structure Plan 2003 adopted in October 2003. RPG6 was superseded by the East of England Regional Strategy 2008. Both the East of England Plan and the Structure Plan have subsequently been revoked and no longer form part of the development plan; the revocation of those plans is confirmed in The Regional Strategy for the East of England (Revocation) Order 2012.
- 2.3 The future status of Cambridge East was consulted on at Issues & Options stage see Options 35 and 36 of Cambridge I&O Report June 2012 [RD/LP/240] and Issue 108 of South Cambridgeshire I&O Report July 2012 [RD/LP/020]. The consultation documents make no reference to the status of the AAP and its relationship with adopted development plan policy. We acknowledge that the Revocation Order for the East of England Regional Strategy 2008 and the Cambridgeshire & Peterborough Structure Plan 2003 came into force on 3rd January 2013, which was after the Issues & Options consultations had taken place. However, there was an opportunity before and during the draft Local Plan stages to consider the relationship between the AAP and revoked development plan policies.
- 2.4 In these circumstances, an assessment should have been undertaken as to whether it was appropriate to continue with the policies in the AAP largely unaltered and whether it was appropriate to retain the status of the land at Cambridge East as safeguarded land to meet future development needs.
- 2.5 Our second point relates to whether Cambridge East should be identified as safeguarded land. Policy 12 of Draft CLP2014 and Policy SS/3 of Draft SCLP identifies Cambridge East as a safeguarded site. Paragraph 85 of the NPPF allows 'safeguarded land' to be identified in Local Plans between the urban area and the Green Belt, in order to meet longer-term development needs. It is not stated, but should be expected, that any land identified as safeguarded will at some point during the next plan period be available for development.

This is not the case with Cambridge East. The availability of land at Cambridge Airport for residential development is uncertain because it is operational and it will be difficult to find a suitable and available site to relocate to. We note that new international flights are frequently added to the list of destinations from Cambridge Airport, which demonstrates that operations are expanding rather than contracting. The owners of Cambridge Airport have confirmed that the site is not available for development. If, as expected, Cambridge East remains unavailable for development beyond the plan period then further land will need to be released from the Green Belt and identified as safeguarded land, which means another amendment to the Green Belt boundary and demonstrates that any boundary identified through this plan-making stage has no permanence.

- 2.6 Therefore, we object to Cambridge East being identified as safeguarded land because it is not available for residential development, and availability in the long term is also uncertain. It cannot be relied upon as a safeguarded site, and as such other land needs to be identified that fulfils the requirements of safeguarded land.
- 2.7 If the safeguarded land status of Cambridge East had been properly reconsidered as part of the Local Plan processes, then it would also have been appropriate to assess whether other land currently within the Green Belt should also have been safeguarded. A proper assessment of safeguarded land has not been undertaken and none of the Green Belt studies have considered this matter. Furthermore, no alternative or additional safeguarded land was identified or assessed as part of the Local Plan processes.
- 2.8 As set out in our representations, we request that Cambridge East is deleted as safeguarded land. Furthermore, a proper assessment of safeguarded land including potential options and alternative or additional sites should be undertaken, probably as part of a comprehensive review of the Green Belt.