



ENGLISH HERITAGE



Statement of Common
Ground as agreed
between Cambridge
City Council and South
Cambridgeshire District
Council and English
Heritage regarding
Matter 6 Green Belt

Cambridge and South
Cambridgeshire Local
Plans - Examinations in
Public

February 2015

1. Purpose and background

- 1.1 English Heritage is the Government's lead advisory body for the historic environment and has a statutory role in the planning system. Central to its role is the advice given to local planning authorities, Government departments, developers and owners on development proposals affecting the historic environment.
- 1.2 English Heritage does not object to the sites proposed for release from the Green Belt for development in the Proposed Submission Local Plans for Cambridge and South Cambridgeshire¹. The sites are small and their development would result in only limited harm to Green Belt purposes.
- 1.3 When responding to the Proposed Submission Local Plans, English Heritage did not have the opportunity to comment on, or object to, alternative sites proposed for Green Belt release by landowners and developers on the edge of Cambridge, though they had commented on, and objected to, a number of such sites at the Issues and Options 2 stage (letter from English Heritage dated 18 Feb 2013²). The purpose of this Statement of Common Ground is to record that they would have objected to all such sites whose development would cause moderate or significant harm to the setting and special character of Cambridge as a historic town, if any had been included as site allocations; and would do so if any such sites are included as Proposed Modifications to the Submission Local Plans as appropriate to the proposed allocation.

2. The Purpose of the Cambridge Green Belt

- 2.1 Cambridge is widely recognised as one of the most important historic towns in England along with Bath, Chester, Oxford and York. The fourth bullet of national Green Belt purposes (as set out in paragraph 80 of the NPPF): 'to preserve the setting and special character of historic towns', has been recognised by Government as being especially relevant to these historic settlements³.
- 2.2 The setting and special character of Cambridge includes both the built environment and the encircling countryside, along with the necklace villages around the city.
- 2.3 The qualities to be safeguarded in order to protect the setting and special character of Cambridge include:
- A compact city with a large historic core relative to the size of the city as a whole;
 - Minimal suburban transitions and/or characteristic approaches to Cambridge from the edge of the city;
 - A city of human scale easily crossed on foot and by bicycle;
 - Key views of Cambridge from the surrounding countryside;
 - Significant areas of distinctive and supportive townscape and landscape;

¹ Cambridge Local Plan (RD/Sub/C/010)

South Cambridgeshire Local Plan (RD/Sub/SC/010)

² Attached to this Statement of Common Ground for reference at Appendix 1 of this Statement of Common Ground (representation 55316)

³ Joint Councils' Matter 6 Statement (M6 – CCC & SCDC) Appendix 2, paragraph A2.20

- Distinctive topography forming the setting to Cambridge;
- A graded and essentially green transition forming the edge to the city;
- Green 'fingers' extending from the surrounding countryside into the city;
- A range of designated sites and areas including Sites of Special Scientific Interest, County Wildlife Sites and Scheduled Monuments enriching the setting of Cambridge;
- Long distance footpaths and bridleways providing links between Cambridge and the open countryside;
- Elements and features contributing positively to the character of the landscape setting;
- The distribution, physical separation, setting, scale and character of necklace villages;
- A city set in a landscape which retains a strongly rural character.

3. Impact of large scale development on the purposes of the Cambridge Green Belt

- 3.1 English Heritage endorses the methodology used to assess areas of significance as undertaken by both councils in the 2012 Inner Green Belt Boundary Study⁴, subject to the value of the Green Belt as a whole not being overlooked through any assessment of its component parts, which it is agreed has not been overlooked in the 2012 Inner Green Belt Boundary Study. English Heritage also agree that the 2012 study and the evidence base generally is fit for purpose and that the Green Belt boundary and relevant land within it has been properly assessed and considered against all relevant Green Belt purposes. English Heritage also agrees that the conclusions of the Study as set out in Plan 4 (*Areas of Significance of Development on Green Belt*) are a correct interpretation of significance. Any proposal for removal of land from the inner Green Belt should therefore be reviewed against the findings of this study.
- 3.2 In the opinion of English Heritage and the two Councils, development as proposed by landowners and developers over and above that already included in Proposed Submission Local Plans around Fen Ditton, on land between Fulbourn Road and Babraham Road, on land south of the Addenbrooke's Access Road, on land south of Trumpington Meadows and on land north and south of Barton Road would cause significant harm to the setting and special character of Cambridge as set out in tables 3, 4, 7, 8, 11, 12, and 18 of the 2012 Inner Green Belt Boundary Study.

⁴ RD/Strat/210 - Plan 4 and Sectors 3, 4, 7, 8, 11, 12 and 18

Appendix 1: English Heritage Response to South Cambridgeshire Local Plan: Issues and Options 2



ENGLISH HERITAGE

EAST OF ENGLAND

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Our Ref:HD/P
Your Ref:

18 February 2013

Dear Mr Miles

**CAMBRIDGE LOCAL PLAN TOWARDS 2031
SOUTH CAMBRIDGESHIRE LOCAL PLAN
ISSUES AND OPTIONS 2**

Thank you for inviting English Heritage to comment on the above local plan consultation documents. We note that the documents are in three parts, with Part 1 being jointly prepared by Cambridge City and South Cambridgeshire Councils.

English Heritage submitted comments last summer on historic environment issues relevant to the future planning of Cambridge City and the surrounding rural district of South Cambridgeshire, in the context of the first issues and options consultations. We note that all representations from the 2012 consultation, and this current one, will be taken into account at this stage. On this basis, we have not repeated all matters referred to in our letters of last year dated 27 July (Cambridge) and 27 September (South Cambridgeshire). It is worth mentioning, however, that English Heritage has issued guidance following the publication of the National Planning Policy Framework (NPPF) relating to heritage in local plans, and this is available on the English Heritage and HELM websites.¹

English Heritage welcomes the opportunities for engagement provided by the two stage issues and options consultations, thereby allowing some of the major strategic issues to be raised prior to draft submission. Our comments on the separate documents are attached. In taking the options forward we hope

¹ *Heritage in Local Plans* can be accessed at: <http://www.english-heritage.org.uk/content/publications/publicationsNew/guidelines-standards/heritage-local-plans/heritage-local-plans-nppf.pdf>

that the Councils' strategy for the historic environment will be a clear element within the wider thinking underpinning the plans, as part of a sustainable approach to development. In this consultation, we are interested to note that further analysis has been carried out to evaluate the inner Green Belt boundary. We have not been able to consider this in detail, and may wish to look at this with you in the coming weeks. A potential challenge for Cambridge is that of the skyline, and how the character of Cambridge is appreciated.

In terms of the topic-based development management policies which are to follow, the extensive evidence base for the historic environment prepared in both local authority areas will have a valuable role in the preparation of distinctive policies, appropriate to the areas' exceptional heritage. Prior to selection of sites in the pre-submission local plan the advice of the county archaeologist should be sought and an appropriate level of archaeological evaluation carried out.

We would very much like to discuss various aspects of these comments with you and will be in touch to arrange a suitable meeting date.

Yours sincerely

Katharine Fletcher
Historic Environment Planning Adviser, East of England

ENGLISH HERITAGE COMMENTS

PART 1 JOINT CONSULTATION ON DEVELOPMENT STRATEGY AND SITE OPTIONS ON THE EDGE OF CAMBRIDGE

Chapter 8 A Sustainable Development Strategy for Cambridge and South Cambridgeshire to 2031

Q1 Where do you think the appropriate balance lies between protecting land on the edge of Cambridge that is of high significance to Green Belt purposes and delivering development away from Cambridge in new settlements and at better served villages?

English Heritage acknowledges that the protection afforded by the Green Belt to the character of Cambridge results in difficult strategic choices. The National Planning Policy Framework (NPPF) carries forward the long established advice from PPG2 regarding protection of Green Belts. Major release of land would undermine the purpose in paragraph 80 of preserving the setting and special character of historic towns.

This has knock-on effects in terms of the need for alternative provision in new settlements and in villages, and potentially for settlements outside these two local authority areas. All of these options will have consequences for the historic environment. The impact on the significance of other historic places and assets needs to be weighed carefully.

In our letters dated 27 July and 27 September 2012 we stated in relation to the Cambridge Green Belt:

'While all parts of the Green Belt are important, some are particularly sensitive and English Heritage would be strongly opposed to development of land to the west, southwest or south of the current city boundaries. Land in this arc (broad locations 1, 2, 3 & 4) forms part of the wider setting of the historic core of Cambridge and the large number of highly graded listed buildings within it. Part of this land also forms the setting to the historic and important village of Grantchester, which is separated from the city by the equally important Grantchester Meadows. At the southern edge of the city the Green Belt boundary has recently been revised to allow the Trumpington Meadows development to take place. Great care was taken in developing the masterplan for this development to form a positive southern boundary to the city, with a piece of open space retained to buffer the city from the motorway. As well as being harmful to remove this land from the Green Belt it would be rather perverse to do so before the Trumpington Meadows development is even complete.

Broad location 5 is sensitive because of the continuity it provides with the landscape areas in the arc to the west, helping to perpetuate a feeling of openness. Here again considerable care has been taken in creating a new urban edge only recently.'

Chapter 9 Site Options

Q2 Which of the site options do you support or object to and why?

Green Belt Sites

English Heritage takes a cautious approach to further removal of land from the Cambridge Green Belt, especially for sites affecting the inner boundary. However, we acknowledge that the work undertaken in this report has attempted to identify those sites which will have the least impact on the Green Belt and the setting of Cambridge. Site specific comments are as follows:

Site GB1: Land north of Worts' Causeway

The curved alignment of Beamonth Road will ensure that to some extent this allocation will give the appearance of 'rounding off' the city edge, though the eastern boundary might then have taken a more northeast-southwest alignment up to the track that forms the western boundary of the large field, whereas the current north-south alignment appears better suited to justifying the allocation of site GB2 (see below). We note the site includes locally listed farm buildings and while these might be retained, their setting is likely to be compromised by the allocation. It will therefore be necessary to consider whether or not there is sufficient wider public benefit to be derived from this allocation to justify the harm. The eastern boundary would need careful treatment to form an appropriate junction between the city and the Green Belt.

Site GB2: Land South of Worts' Causeway

On its own this site does not appear a logical removal from the Green Belt and would only be justified if was developed alongside site GB1, and in that event we would recommend that GB1 is developed before GB2 is commenced. The eastern boundary would need careful treatment to form an appropriate junction between the city and the Green Belt.

Sites GB3 and 4: Fulbourn Road West (1&2)

These two sites are a relatively modest allocation where the boundary of the built edge to the city would now be aligned to the southern boundary of the adjacent Technology Park. English Heritage does not object to these two sites but would wish to see careful treatment to the southern boundary of both sites so as to form an appropriate boundary with the Green Belt.

Site GB5: Fulbourn Road East

This site is immediately east of the Technological Park that lies to the east of sites GB3 & 4. However, it is also beyond the current perceived boundary of the city and its allocation would adversely impact on the functions of the Green Belt. About a third of the site extends east of Yarrow Road and overlaps the Fulbourn Hospital Conservation Area. Development on this part of the site is likely to adversely impact on the setting of this conservation area and harm its character and appearance. In the event that the allocation is to be pursued, English Heritage would strongly recommend that the site does not extend to the east of Yarrow Road and that the southern boundary would need further consideration to ensure housing is not built on the crest of the hill that rises to the south of the Fulbourn Road.

Site GB6: Land South of the A14 and west of Cambridge Road (NIAB 3)
While the presence of the A14 will ensure that this allocation does not result in any real harm to the setting of Cambridge, it will be important to ensure the northern boundary of the site is kept sufficiently distant from the A14 to allow a robust landscape corridor and to avoid a repeat of the poor relationship between Orchard Park and the A14.

Community Stadium Sites

English Heritage notes the proposition that the existing Abbey Stadium site be allocated for redevelopment for housing. However, we have very serious concerns over at least some of the sites put forward for a replacement community stadium and note that there may be problems with availability of other sites for use as a community stadium, while others are possibly too far from Cambridge to be considered viable. Therefore, unless and until a suitable, viable and deliverable alternative site is identified, which does not require removal of extremely sensitive Green Belt land, then English Heritage is of the view that the current Abbey Stadium site should be retained for stadium use.

Site CS1: The Abbey Stadium and adjoining allotment land, Newmarket Road
For the reasons outlined above, this is English Heritage's preferred option.

Site CS2: Cowley Road, Cambridge

English Heritage would have no objection to this site being used for the Community Stadium.

Site CS3: North of Newmarket Road, Cambridge East

This is a large site allocation which abuts the Green Belt, and while English Heritage would not object in principle to the community stadium being sited within this overall area, we do not believe it would be appropriate for the stadium to be located near the Green Belt edge. A structure of this size incorporating floodlights would adversely impact on the Green Belt.

Site CS4: Land South of the A14 west of Cambridge Road (NIAB 3)

English Heritage would not object in principle to the location of a community stadium on this site.

Site CS5: Land South of Trumpington Meadows, Hauxton Road Cambridge.

English Heritage considers that a Community Stadium here would have a very serious adverse effect on the approach into Cambridge from the south, and would significantly undermine the purpose of the Green Belt in terms of preserving the character and setting of Cambridge. Following the development of Trumpington Meadows, this site now forms an extremely important role in buffering Cambridge from the M11. At the time of the Trumpington Meadows application very significant consideration was given to the edge of the development and the views of Cambridge from Hauxton Road. Allowing this site to come forward would override the principles underpinning the limits to that release from the green belt and erode the function of the green belt in this location. The recent decision by a planning inspector to reject a proposal for a large re-cycling centre south of Addenbrookes Access Road reinforces the significance of the landscape in this gateway area to the

character of the city. The suggestion of incorporating an additional 400 houses would further compound the harm. English Heritage would oppose an allocation here.

Site CS6: Land between Milton and Impington, north of A14 (Union Place)
Allocation of a site for a community stadium to the north of the A14 would be a significant step in terms breaching the defined limits to Cambridge and could undermine the principle of a compact city. This is not in other respects a sensitive area.

Site CS7: Northstowe

While English Heritage has no objection to the idea of locating the community stadium within Northstowe, the desirability of locating the stadium so far from the city may raise questions.

Site CS8: Waterbeach New Town Option

English Heritage commented in relation to the South Cambridgeshire consultation in 2012 that development of a new settlement at Waterbeach would potentially affect the setting of Denny Abbey, a scheduled monument open to the public, and that of the associated listed buildings. Notwithstanding these concerns, we are of the view that a case for development of the airfield could be made, but that the option for 12,750 dwellings would not be acceptable due to the encroachment on Abbey complex. The smaller new settlement option proposed, for 7,600 dwellings, may be capable of implementation while respecting the monument; however, this would be subject to analysis of the setting of the Abbey and the associated archaeology.

The sensitivity of Denny Abbey derives particularly from the views out across the surrounding flat landscape that are so important to the sense of isolation and significance of the place. A large stadium would therefore be difficult to assimilate. The bulk of the building and associated floodlighting would be likely to be very intrusive. The map on page 86 shows the larger option for a new settlement of 12,750 dwellings which we do not consider can be implemented without significant damage to the setting of Denny Abbey and the associated heritage assets.

Site CS9: Bourn Airfield New Village Option

We have no objections in terms of heritage impacts, although as we note in relation to Northstowe, this site would also be remote from the city.

Q3 Do you have any comments on the sites rejected by the Councils in Appendix 4?

English Heritage agrees with the rejection of all the sites set in Appendix 2.

Sites in Broad Location 1 (north and south of Barton Road) together with sites in **Broad Location 2** (Playing fields off Grantchester Road, Newnham) and **Broad Location 3** are all very sensitive and important to the setting of the historic core of Cambridge. The historic skyline of Cambridge is clearly visible

from the western approaches to the city in this area and the inner boundary of the Green Belt in these locations should be regarded as permanent.

Sites in **Broad Location 4** (west of Hauxton Road) are important for the reasons set out in our objection to this land being allocated for a Community Stadium. The current boundary of the Green Belt in this vicinity was reviewed and revised when the Trumpington Meadows site was allocated. At that time it was widely agreed that it was important to keep the edge of Cambridge away from the M11 and to allow adequate buffering between the new edge of the city and the motorway.

Sites in **Broad Location 5** (south of Addenbrooke's Road)

The new Addenbrooke's access road forms a logical boundary to the city in this location, and that principle was accepted by the Inspector at the Inquiry to consider the proposed waste recycling facility that was proposed for part of this land. Development in this area would also result in the coalescence of the villages of Great Shelford and Stapleford with Cambridge, which English Heritage believes would be harmful for the character and appearance of both villages.

Sites in **Broad Location 6** (south of Addenbrookes and southwest of Babraham Road, together with sites in **Broad Location 7** (Land between Babraham Road and Fulbourn Road). The current site allocations allow for a modest erosion of the Green Belt in this vicinity of the city and further large scale incursions into the Green Belt would be harmful to the purpose of the Green Belt. In the event that any of these sites are to be reconsidered, English Heritage would wish to review the impact of any allocation in views from the nearby Gog Magogs.

Sites in **Broad Location 9** (Fen Ditton)

In spite of its close proximity to Cambridge the village of Fen Ditton retains a distinct identity, with a clear and discernable character of a small Cambridgeshire village. Allocation of any of the sites proposed around the village would seriously erode this identity, and harm the setting of the many heritage assets within it.

ISSUES AND OPTIONS 2: PART 2 – SOUTH CAMBRIDGESHIRE FURTHER STE OPTIONS

Chapter 2 Housing

Question 1 Which of the Site Options do you support or object to and why?

Site H4: Land North of White Filed Way, Sawston

This allocation would require removal of land from the Cambridge Green Belt and English Heritage is concerned that there is inadequate justification for this. The allocation would also set a precedent for Sawston village to expand out to the by-pass, which we would be to the detriment of the relationship between the village and the by-pass.

Site H8: Orchard and land at East Farm, Melbourn

While this allocation would not directly impact on the historic built environment, it is not well related to the built-up area if developed on its own, and would also result in loss of one of the few remaining orchards in the area.

Site H9: Land north of Bannold Road, Waterbeach

English Heritage is of the opinion that this site should not be allocated at this stage until the proposals for Waterbeach barracks are more clearly established, since it may be desirable to retain this open space between the existing village and any new community established on the barracks site.

Site H10: Land at Bennell Farm, West Street, Combeton

Comberton is an historic village that has a linear plan-form, but this has been eroded through developments in depth that have taken place particularly in the latter part of the twentieth century. This site is at a point where the density of housing would traditionally be reducing. Some limited housing fronting onto West Street might be possible without harming local character.

Chapter 3 Employment

Question 3 Do you support or object to Granta Park Established Employment Area boundary, and why?

Site E2 Boundary of Established Employment Area at Granta Park
Abington Hall is a Grade II* listed building and English Heritage is concerned that its setting must be adequately protected. The existing employment area has had some impact on its wider setting, but the proposed expanded boundary has significant implications for its more immediate setting. The allocation also has implications for the setting of the separately listed Grade II South Lodge. We note that the proposals set out in applications s/2475/12/CA&S/2466/12/06 would improve the setting of the hall, but would not wish to see further development in this area. There may be some scope for expansion of the employment land to the south of the hall (ie south of the existing buildings that already are located on the south side of the hall), but

this will need careful masterplanning to ensure that the setting of the hall is not further eroded.

Chapter 5 Village Frameworks Parish Council Promoted Options

Question 7 Which of the Parish Council proposed amendments to village frameworks do you support or object to and why?

In all cases, we would suggest that any existing characterisation analysis of the villages, such as conservation area appraisals, parish plans and village design statements should be considered when taking a view on the proposals.

Option PC2: Parish Council's proposal to reinvigorate Cottenham
While English Heritage is supportive of the principle that Cottenham Parish Council wish to reinvigorate their village, we have serious concerns over the extent of the land currently under consideration and the implications this might have for the historic built environment and the legibility of the original linear plan-form of the village. In English Heritage's view a lot more work needs to be done to understand the implications of these proposals and to prepare a more balanced plan that will safeguard the village's built heritage while still allowing it to develop and evolve. It may be that the Prince's Foundation might be able to assist in this process through their 'Enquiry by Design' process, and English Heritage would welcome the opportunity to be part of that process should the Parish Council decide to pursue this way forward.

Option PC10: Whaddon

While on paper this site may appear a logical 'rounding off' of existing development, the historic map in the Whaddon Village Design Statement (January 2012) shows this site to be part of the last vestiges of the 'Great Green' that was bounded on its north side by the River Cam and a string of farms, many of which still survive and two are listed at Grade II. Development of this site would mask the historic form of the village and potentially impact on the setting of two Grade II listed former farmhouses.

AGREEMENT

Signed by:

A handwritten signature in cursive script that reads "Saunders".

Sara Saunders on behalf of Cambridge City Council

Dated: 3 February 2015

Signed by:

A handwritten signature in cursive script that reads "Caroline Hunt".

Caroline Hunt on behalf of South Cambridgeshire District Council

Dated: 3 February 2015

Signed by:

A handwritten signature in cursive script that reads "David Grech".

David Grech on behalf of English Heritage

Dated: 3 February 2015