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12 December 2021

Ref: Greater Cambridge Local Plan Consultation

Letter sent by email to: localplan@greatercambridgeplanning.org

Dear Sir/Madam,

Ref: CPRE Cambridgeshire and Peterborough Branch (CPRE) - Response to Greater Cambridge Local Plan First Proposals Consultation.

Thank you for your email of 1st November 2021 advising CPRE that the above consultation was open. CPRE's comments are as follows.

Consultation Process

1. CPRE has found the consultation process via Greater Cambridge Local Plan consultation website to be confusing and cumbersome. We are concerned by the apparent pressure for direct electronic response which we believe many residents who do have computers and the skills to use them will find difficult and for those that don't, impossible. We are concerned that there is only very limited availability for public inspection of documents and that the only place we could find the locations for such inspection was in the Public Notice of the consultation received with the above email. This stated:

The consultation documents can be viewed:

- on the Greater Cambridge Shared Planning Service website
www.greatercambridgeplanning.org/localplan
- by appointment at Cambridge City Council's Customer Service Centre: Mandela House, 4 Regent Street, Cambridge, CB2 1BY (phone 01223 457000);
- by appointment at South Cambridgeshire District Council Reception: South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA (phone 01954 713000);
- at Cambridge Central Library (7 Lion Yard Cambridge CB2 3QD) and Cambourne Library (Sackville House, Sackville Way, Cambourne, Cambridge CB23 6HD) during normal opening hours.

2. So, there were only two locations where copies of the consultation documents could be viewed at will, without an appointment. Why has this information not been made available for inspection in other libraries and library access points or other suitable locations across the City and the District? Are people from places like Gamlingay, Bassingbourn or Linton really expected to drive to or use a bus to one of these two locations to access the consultation documents? Furthermore, as far as we could find, the information about the locations was not clearly available on the consultation web site, only in the attached Public Notice. Why not?

3. We are concerned by the sheer number and complexity of the documents provided and while there has been some attempt to simplify, summarise and abbreviate some communications, this is often not into a form which allows members of the public or even organisations like our own to obtain a clear and rounded understanding of the proposals. Instead, over-simplification which errs towards a marketing approach rather than a factual one leads to the need to search for facts elsewhere. We found that the embedded links to the Sustainability Appraisal and the Habitats Regulations Assessment documents did not work. In the Document Library, the former consists of 4 documents, with the main document consisting of 413 pages with no Executive Summary. Likewise, the HRA report was 215 pages with no Executive Summary. The Consultation Statement is 922 pages with no Summary. This pattern is repeated throughout the library of supporting documents. This appears more akin to preventing knowledge transfer than enabling it.
4. We are pleased by the number of public engagements that have taken place both by physical meeting around Cambridge and by webinar but we are concerned that the most rural areas of the district have either not received local exhibitions or presentations, or these have not been clearly listed.

Timing of the Consultation

5. There are several questionable issues of timing associated with this consultation. Firstly, it is taking place in near parallel to the “Making Connections” and “Cambridge Eastern Access” consultations being run by the Greater Cambridge Partnership, both of which have a direct bearing on aspects of this consultation.
6. Secondly, it assumes the further coordinated development of the so-called “Ox-Cam Arc”, which is now under review by the Department for Levelling Up, Housing and Communities.
7. Thirdly, it assumes the existence and influence of a “UK Innovation Corridor” and a “Cambridge-Norwich Tech Corridor”. Both of these are concepts driven by business interests about which there has been little, if any, publicity or public debate. They are not part of an accepted national planning strategy.
8. Fourthly, the Combined Authority is responsible for transport planning for the County and a consultation on the Local Transport & Connectivity Plan that will have significant implications for this Local Plan has only just been completed and the outcomes are as yet unknown.
9. Fifthly, and perhaps most importantly, any development in or around Cambridge is predicated upon the availability of sufficient potable water supply, yet Water Resources East are still in the process of developing a Regional Water Plan which will not be available for consultation until summer 2022 and several of the basic concepts of which appear fundamentally flawed.
10. CPRE considers that, although the current Local Plans for both authorities, which were only signed off in 2018, carried an Inspector’s recommendation to effect a joint Plan, this study is premature because many key facts which will inform it remain unavailable. This haste will likely lead to a considerable waste of public money at a time when both authorities are struggling for funds to meet their statutory obligations.

Vision and development strategy

11. CPRE have read the Vision statement on the web site. It sounds forward-thinking. It is a great shame the Vision is not matched by the development strategy. The entire strategy is predicated on growth of both population and employment. Cambridge and South Cambridgeshire are areas of effectively full employment. So, any growth in jobs can only be achieved by encouraging inward migration of significant numbers of people from other, often poorer, areas of the country.
12. Such population movement will deplete other regions of some of their youngest and most dynamic populations, causing damage to the social and economic fabric of those areas. It is not consistent with the government’s Levelling Up agenda.
13. The development strategy is not consistent with the stated vision of Greater Cambridge, being *“a place where a big decrease in our climate impacts comes with a big increase in the quality of everyday life for all our communities”*. Quite the opposite. The level of housing and business development proposed will cause significant increases in both embedded carbon due to construction and emitted carbon due to the

increased population living in the area and the additional infrastructure needed to support them. A vision which sought to spread Cambridge expertise to other areas of the country, which could benefit from refurbishment and redevelopment, would be far more forward-looking socially and climatically.

Cambridge urban area

14. CPRE considers that some of the regeneration proposed within the Cambridge urban area, for example the Travis Perkins site, is welcome. However, there are other proposals which seem badly thought out and not in the best interest of the city or its residents.
15. The level of boring, high rise, slab development around the station has already turned this into a characterless area without charm or visual interest. It could be anywhere. More, similar development will only worsen an already bad situation.
16. CPRE are most concerned about the nature and scale of the North East Cambridge proposals. They are predicated on Anglian Water moving the only modernised sewage treatment plant in the area with spare capacity, into the Green Belt. The planned developments appear too high, characterless and lacking in a practical base for a thriving community, so close to the expanded A14. Discussion with Anglian Water on how they might reduce the environmental footprint and physical area of their existing site could still yield some land for industrial and housing development. The Anglian Water site would form a convenient barrier between new developments and the A14. It is also strange that proximity to the existing Guided Busway is given as a positive factor. Are the people living here expected to commute to St Ives? Because from Milton the busway ceases and its vehicles run on the city streets.
17. We are concerned that the area around Shire Hall and in particular the Castle Mound, with its view of Ely Cathedral on a clear day, will not be damaged by the type of unsympathetic development which has occurred elsewhere in the city.

Edge of Cambridge

18. The development of Cambridge East is predicated on closure of Cambridge Airport. The airport area is one of, if not the largest employers in Cambridge. Where will these skilled engineering staff find employment? Additionally, if Cambridge is to be such a significant centre of international business, why would it not need its own airport, providing flights to national and international hub destinations?
19. Further development in North West Cambridge will cause development to completely dominate this green space between Huntingdon Road and the M11. This green space is important for the existing residents and to the character of the area. Further major development in this area polluted by the M11 and A14 and their major intersection is unwise.
20. With respect to Policy S/CBC, CPRE objects strongly to the release of further Greenbelt land, identified as the area S/CBC-A. The existing allocation of land around the Addenbrokes site has not been built out. Land that has been built on recently has been used profligately. There is indication that since BREXIT and the move of the European Medicines Agency from London to Amsterdam, there will be less interest by major pharmaceutical companies in moving to anywhere in the UK including Cambridge. The UK is now a 'secondary' market in the priority of new pharmaceutical product registrations. It is more likely that companies based in the UK will move at least some of their activities to the Netherlands, especially now that the EU and the USA have reached a Mutual Recognition Agreement for drug manufacturing inspections.
21. CPRE agrees with the findings of the Greater Cambridge Green Belt Study (2021) which identifies that release of the areas proposed would result in very high harm to the Green Belt and that there are concerns regarding biodiversity and landscape impacts from the scale of development proposed by the Campus.
22. CPRE also objects to the apparent attempt to turn the "Proposed Area of Major Change" into some kind of greenwashed country park as compensation. This appears to be an underhand attempt at carbon off-

setting on what is much needed, productive, farm land. Such “compensatory improvements” are a developers’ myth. Once the released land has been developed it is gone.

23. With respect to Policy S/WC: West Cambridge, this area is already well developed and further infill within the outlined boundary is sensible. However, CPRE is concerned to ensure there will be no further spread south onto the green fields between Cambridge and the M11.
24. CPRE are concerned by the retention of the two allocations between Huntingdon Road and Histon Road (Darwin Green). These are significant areas of green space on the northern edge of the city which help retain the character of the city’s integration with its rural surroundings.
25. CPRE are concerned by proposed further development along Fulbourn Road on highly productive farm land at S/EOC/E/3: Fulbourn Road East, even though this is a retained policy.

Existing New settlements

26. CPRE objects strongly to Policy S/CB: Cambourne and the proposed further expansion of Cambourne West. This is an object lesson in how urban sprawl occurs when there are no insurmountable natural barriers to stop it. Cambourne was designed as a discrete ‘village’ development to take up overflow from Cambridge in order that the City’s character could be retained. This policy will take up further productive farm land and will lead to a never-ending cycle of demand for additional development. Our concern is that in the longer term, the extension of Cambourne and proposed and current developments around St Neots towards Bedford along the A428/A421 main route will generate further pressure for development until Cambridge is joined to Bedford in one long urban sprawl.
27. CPRE understands Policy S/NS to carry forward the existing allocations for new settlements Northstowe, Waterbeach and Bourn Airfield. However, CPRE is very concerned indeed by the poor building control, lack of democratic control of detailed planning decisions, the damage to underground water bodies, increasing flood risk, lack of engagement with local communities and lack of engagement with local expert and statutory bodies such as the local Internal Drainage Boards which is occurring as development proceeds at two of these sites, Northstowe and Waterbeach. This approach to planning is going to lead to disaster for the planning authorities, for residents and for the custodians of the water resources. Before, any further permissions are given within these allocations, CPRE considers it absolutely essential that these issues are addressed and any problems resolved.

Rural Southern cluster

28. CPRE objects strongly to Policy S/GC: Genome Campus, Hinxton. The proposed policy area is many times the area of the existing campus and the majority of it is on productive farm land on the opposite side of the A1301. To hide this attempted sprawl into the countryside by badging it as a potential expansion of the Wellcome research business, when that business has room for expansion on its existing site, is less than honest.
29. This area of land may be close to a significant road junction but Hinxton is a rural community with a long history in a countryside location and this should be respected. We find this proposal doubly surprising when it was only just over two years ago that CPRE supported the District Council in its rejection of a similar proposal in the countryside near Hinxton, rejection which was upheld by the Planning Inspectorate on appeal.
30. CPRE objects most strongly to Policy S/BRC: Babraham Research Campus. The proposed policy area would approximately double the size of the existing site. It is unacceptable to withdraw this area from the Green Belt. Withdrawal is not consistent with the National Planning Policy Framework. The Babraham site is located within the Cambridge Nature Network and adjacent to two strategic green infrastructure areas (Green Infrastructure Strategic Initiatives: Gog Magog Hills (3) and River Cam Corridor (2c)).
31. Vague terms such as these used by the Shared Planning Service:
 - *Protect and enhance the landscaped setting of the site*

- *Preserve the appearance of the conservation areas, and the setting of the Grade II Listed Babraham Hall and the Grade I Listed St Peters Church.*
- *Protect and enhance the corridor of the River Granta (recognised as a county wildlife site)*
- *Take steps to include sustainable travel opportunities, including the opportunities provided by the planned Cambridge South East Transport Scheme.*
- *Retain the area of The Close as key worker and affordable housing to support the needs of the Campus. Any future renovation or replacement should retain the low density character, which responds to the sensitive village edge location.*

provide no comfort that this Policy will not lead to further sprawl into the countryside.

32. The proposed Policy Area extension is on higher ground than the existing campus buildings and the location is sensitive in landscape character, being visible from the higher ground of the Gog Magog Hills, including from the Roman Road Scheduled Ancient Monument. The landscape has already been damaged by one of the recently constructed buildings on the campus. CPRE is very concerned by the further development of this site towards Cambridge and we will request the Secretary of State to consider very carefully any further attrition of the Green Belt at this location.

Rest of the rural area

33. CPRE does not support development S/RRA/H Land at Highfields (phase 2), Caldecote. On its own as a village development this would have made sense. However, given the proximity of the nearby major development at Bourn Airfield, CPRE considers this will eventually lead to coalescence and a continuous urban sprawl alongside the A428 from Caldecote to Cambourne.
34. CPRE is concerned by proposal S/RRA/CR Land to the west of Cambridge Road, Melbourn. At first sight, there is logic to this proposal but it could further industrialise the centre of this historic village which has already been badly visually affected by the existing Science Park.
35. CPRE would not support further development at the Cambridge Services site close to the A14 as proposed by S/RRA/SAS, Land to the south of the A14 Services. There is no natural barrier to prevent further expansion into the wide-open landscape at this location which has already been damaged by the necessary but unfortunate location of the services. Such development will lead to further, unsightly, road freight driven sprawl.
36. For similar reasons, and the potential for additional traffic through the centres of Swavesey and Over, CPRE would not support the further expansion proposed by S/RRA/BBP, Land at Buckingham Business Park, Swavesey.
37. CPRE would like to see some form of development protection given to the nearby, former private, outdoor, laboratory of the late Dr Norman Moore at Boxworth End, Swavesey. Dr Moore was one of the UK's most significant conservation scientists of the 20th century. He founded the former Monks Wood Research Station and established the link between wildlife mortality and widely-used pesticides. The site itself has some local value as habitat and a landscape amenity. However, its overwhelming significance is as a site of scientific study, in particular of ecology and wildlife conservation. This small site was created and studied minutely by a scientist who led the world in his chosen fields - the ecology of hedges and the chemistry of certain pesticides. Boxworth End could show future generations how these issues were first confronted. CPRE's ongoing national campaign, supported by Lord Deben, to protect and enhance hedgerows nationally attracted a lot of support at a day in Parliament recently, demonstrating just how important hedgerows are to the future health of the countryside and at what level this is recognised.
38. CPRE is not in favour of proposal S/RRA/SNR, Land to the north of St Neots Road, Dry Drayton. This small land parcel forms a green buffer between St Neots Road and the A428 and development would create further coalescence along the A428.

39. CPRE would support the redevelopment proposed by S/RRA/OHD Old Highways Depot, Twenty Pence Lane, Cottenham, providing it was limited to employment Class E(g)(i) (offices to carry out any operational or administrative functions) and/or E(g)(ii) (Research and development of products or processes). CPRE would strongly oppose development of this site for Class B8, storage and distribution use. Cottenham already endures significant disturbance from HGV traffic arising from the industrial site further north along Twenty Pence Road.

Climate change – development issues

40. CPRE largely supports Policy CC/NZ: Net zero carbon new buildings. However, to be effective it needs to be taken in conjunction with three further policies which we have not discovered in the draft Local Plan, namely:

- a 'brownfield first' policy for new building
- a policy to minimise the number of new buildings and developments in the Greater Cambridge region
- a policy to halt the use of scarce farm land for solar energy generation and instead ensure that solar installations are mandated on all industrial buildings, new and existing. Policy CC/RE: Renewable energy projects and infrastructure, is totally ineffective in this respect.

41. The draft Local Plan is not consistent with national government policy because it does not follow a 'brownfield first' approach. It is also concerning that the Plan is seeking to build more houses in the Cambridge area than required by current planning legislation and the 'five-year land supply'.

42. As stated above, the Plan assumes the development of the Ox-Cam Arc, which is leading to more greenfield building which maximises carbon emissions. The Local Plan should not be accepting the Arc, instead the local planning authorities should be firmly resisting this outdated idea of 'clustering' of science-based businesses. These businesses operate globally, increasingly using the internet to minimise business travel and they can operate anywhere. The development of vaccines during the pandemic has proved the effectiveness of remote collaborative working on a global scale.

43. Rather than encouraging further building on precious high grade farm land around Cambridge all responsible local organisations involved in planning, including the University and businesses, should be encouraging and enabling redevelopments in other regions, where there are up to 1 million empty homes and space for [1.3 million more on registered brownfield sites](#).

44. Embedded carbon emissions arising from construction appear to be ignored in the Plan. Cement manufacture contributes 8% of global carbon emissions which is more than three times the impact of aviation fuel. Iron and steel production accounts for another 8%. Between them they account for more emissions than the USA and are second only to China as greenhouse gas emitters.

45. According to the recent Cambridge and Peterborough Climate Commission report, at the present rate the Region will have used up its entire carbon budget, allocated to meet its legal obligation to reach zero carbon by 2050, in less than six years; due to the level of planned growth, emissions will accelerate further.

46. The Climate Change Committee, led by Lord Deben, has argued in its 2018, 2019 and 2020 Annual Reports to Parliament that UK local and imported emissions arising from construction, must be reduced if the UK is to meet its now legal emission targets. Yet this Plan is seeking to increase construction.

47. Large areas of some 'brownfield' sites, such as old airfields like Oakington, Waterbeach and Bourn, are not brownfield at all. Only their disused runways, hard-standing and associated buildings are brownfield and most of their area is already turned back to use as productive farmland. It is unacceptable that local planning authorities are blindly ignoring this fact.

48. All unsustainable growth must be halted as a matter of global and national emergency, yet the level of building and infrastructure growth contained in the draft Local Plan breaches all obligations for sustainable development other than those arising from future operation.
49. Policy CC/DC: Designing for a changing climate, is closing the stable door after the horse has bolted.

Climate change – water supply issues

50. Policy CC/WE: Water efficiency in new developments, is not going to solve the potable water crisis affecting Cambridgeshire, a crisis which is only likely to deepen if the report written by Stantec for the Shared Planning Service is ignored.
51. The Environment Agency document titled “Water stressed areas – final classification 2021”, published in July 2021 by DEFRA, included the fact that the supply areas of Cambridge Water and Anglian Water are areas of **serious water stress**, page 6. According to Appendix 3 of this document, Cambridge Water needs to reduce abstraction by 22 megalitres per day from levels current at 1st July 2021, and Anglian Water needs to reduce abstraction by 189 megalitres per day from levels current at 1st July 2021.
52. Anglian Water’s proposed solution to this problem, pumping water from North Lincolnshire, appears completely impracticable because the Environment Agency, in the same report, has also classified North Lincolnshire as an area of serious water stress.
53. Another solution being considered by Anglian Water, according to Water Resources East, is to build two reservoirs in the Fens. However, this idea seems to completely ignore the fact of sea level rise which will likely cause much, if not all, of the Fens to be flooded by seawater within decades.

Climate change – flooding issues

54. CPRE finds Policy CC/FM: Flooding and integrated water management to be totally inadequate in the face of the increasing flood risks arising in the county, the greatest of which is the likely loss of a high percentage of the Fens to flooding within decades, as referred to above.
55. The river Great Ouse is tidal up to Brownhill Staunch between Earith and St Ives. This means that areas such as Cottenham Lode, which extends to the A14 and the edge of Cambridge, are at future high risk of tidal flooding as well as the fluvial flooding experienced in winter 2020/21 in places such as Cottenham, St Ives and St Neots. There is also increasingly high risk of flash flooding in these low-lying areas due to the increased intensity of rainfall arising from climate change. Such flooding was experienced in several areas of the county, including Peterborough, during 2021.
56. The inexorable and increased rate of sea level rise means that the Fens will initially be subject to occasional and then annual flooding. The annual flood risk will be increased by the additional volume of run-off from development coming downstream. Eventually, the tidal inflow will cause permanent flooding and large areas of the Fens will be returned to saltmarsh. However, even the first stage of annual flooding will have a significant negative effect on agriculture and national food supply. It was found after the 1947 and 1953 floods that crop yields were reduced for seven years due to the presence of a nematode in seawater.
57. To illustrate this situation numerically, the Environment Agency has been measuring sea level (AOD) in the Wash for many years. It was rising at a rate of 3 mm per year. In 2019 it was agreed that measurements by the Environment Agency and by IPCC indicated that the annual rate of sea level rise had increased to 3.3 mm per year. The IPCC2014 report predicted global sea level rise of 1 metre by 2100. The IPCC2019 report predicted sea level rise of 1.1 metres by 2100. In 2021, IPCC increased its estimate again to 2.4 metres by 2100. Climate Central estimates sea level rise of 4.7 metre by 2100 if global temperatures rise by 2°C. Worryingly, in 2021 both the IPCC and the COP26 leadership have confirmed that the world can expect a 2.4°C global temperature rise.
58. Evidence shows that any [increase in artificial surfaces](#), such as buildings and roads, leads to a decrease in water in the environment. Development also leads to a decrease in the amount of land that can absorb rainwater and recharge water bodies. According to the Royal Horticultural Society, [70% of ponds have been](#)

[lost](#) from the UK countryside since 1970. The River Cam has lost on average [half its flow](#). In 2019, the River Granta dried up completely. Freshwater biodiversity populations have [declined by 84%](#).

59. By continuing to build on the scale planned, Cambridgeshire is sowing the seeds of its own destruction. Firstly, it is creating avoidable carbon emissions which will contribute to global temperature rise. Secondly, that temperature rise will cause large parts of the county to flood permanently. Thirdly, the additional run-off from development will increase the risk of flooding and bring forward the date of permanent flooding of large parts of the county. This issue must be taken far more seriously than the token gesture of Policy CC/FM.

Climate change – reducing waste and supporting the circular economy

60. While CPRE supports and positively encourages the principle of reducing waste and supporting the circular economy, it deems Policy CC/CE far too weak. Worse, the draft Local Plan is not in accordance with the first principles quoted in this policy: *“construction waste will be addressed following the waste hierarchy and the 5 r’s of waste management: Refuse, Reduce, Reuse, Repurpose, Recycle.”*
61. All unnecessary construction should be Refused and all construction Reduced. This includes the excessive building across South Cambridgeshire proposed by the draft Plan.
62. Existing constructions should be Reused, Repurposed or Recycled. This applies not just within the Cambridge region but right across the country with Cambridgeshire doing whatever it can to encourage the reusing, repurposing and recycling of the nearly 1 million empty homes in the UK and the recycling of the 1.3 million brownfield sites across the UK before permitting further greenfield construction around Cambridge.
63. These principles apply to construction as a whole, not just to construction waste. Their proper application will have a major effect in reducing greenhouse gas emissions.

Climate change – Supporting land-based carbon sequestration

64. We are puzzled by Policy CC/CS: Supporting land-based carbon sequestration while supporting the principles. There is very little undrained peat in South Cambridgeshire or Cambridge City.
65. Could this be the policy that is aimed at justifying re-flooding the Fens due to the effects of greenhouse gas emissions and increased run-off which the level of increased construction will cause?

Biodiversity and green spaces

66. The stated aim *“Increase and improve our network of habitats for wildlife, and green spaces for people, ensuring that development leaves the natural environment better than it was before.”* clearly demonstrates that this draft Local Plan is adopting a green-washing approach to bio-diversity.
67. Except in the case of some brownfield sites which can be restored, or existing sites where greenspace can be improved, development will always damage the natural environment. Even the supply of building materials will likely damage the natural environment elsewhere, whether obtained locally, nationally or internationally.
68. The best possible treatment for the natural environment is to leave it undeveloped and in its natural state. There are steps that can be taken to improve the biodiversity of unbuilt land with appropriate planting and management. These are steps which should be encouraged.

The next few sub-paragraphs are taken from the submission of The Friends of the Cam and are statements which CPRE fully supports and has signed up to:

- a. Concepts such as Natural Cambridgeshire’s ‘Doubling Nature’ ambition, Biodiversity Net Gain (BNG) and Natural Capital Accounting (NCA) are being used as bargaining chips in the developers’ casino that broadly amounts to saying ‘no development means no funding for nature’. This is the antithesis

of John Lawton's 2010 plea in 'Making Space for Nature' of significant funding for Nature conservation *without any strings attached*.

- b. The concept of doubling nature is ill-defined (doubling what, exactly?). The Draft Local Plan needs to define exactly how the concept will be understood and measured.
 - c. The global experience of [Biodiversity Net Gain, reviewed by zu Ermgassen of DICE, University of Kent](#), is that it fails twice as often as it succeeds, even though it had the lower bar of No Net Loss,>NNL rather than BNG.
 - d. The same group more recently showed that 95% of early-adopters of BNG practices in England are carrying out on site offsetting (something not covered at all in the new Environment Law) where the developer is the judge, jury and executioner of any offsetting plans. In any case, on site offsetting will not encourage many forms of wildlife and will be prone to the dog-fouling and trampling that harms many wildlife areas, even those remote from housing. Meanwhile, off-site off-setting is already damaging local communities in some rural areas.
 - e. Natural Capital Accounting is an untested concept. The monetary assessment of ecosystem services (the 'yields') is recognised as being inadequate at present, while assessing the monetary value of ecosystem stocks is more or less impossible ([Ian Bateman](#), communicated to [David Rogers](#)). Yet the resulting monetary assessments may be used to trade away environmental for economic assets with a greater yield, for example a factory in a water meadow.
 - f. The natural environment is our vital life support system and it is a dangerous delusion to imagine that it can be rendered easily into any economic framework (let alone the pre Dasgupta framework that gives GDP/GVA primacy over all other forms of stocks and yields).
 - g. Dasgupta defines wealth as the sum of natural, human and economic capitals and yields, and sustainability as the condition where this sum is either stable or increasing. Economic growth at the expense of natural capital and yields is therefore unsustainable.
 - h. We request that the Cambridge Local Plan adopts the Dasgupta definition of sustainability (i.e. definitely not the NPPF's false definition of 'sustainability'), with the caveats mentioned above, especially the false or under-valuation of natural capital. This would provide a better starting point, and the Plan should be reworked in this context.
69. CPRE repeats the request made in paragraph h) above.
70. CPRE are disappointed that we can find very little mention of hedgerows in this part of the plan or elsewhere. Hedgerows are significant contributors to bio-diversity, as was demonstrated by the work of Dr Norman Moore. In addition, hedgerows are more effective carbon sequestrators per unit area than tree plantations, certainly in the first ten years of growth if not longer. With six to seven tree plants per metre in a hedge, it stands to reason they will be most effective carbon sinks.

Great places policies

71. CPRE supports the principles expressed in this section and its accompanying policies. Indeed, we are pleased to see expressed the established local purposes of the Cambridge Green Belt, which are to:
- preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre
 - maintain and enhance the quality of its setting
 - prevent communities in the environs of Cambridge from merging into one another and with the city.
72. However, CPRE does not believe that the draft Local Plan is adhering to these principles, particularly in the case of proposals to remove several sites from the Green Belt.

73. We are also concerned that some of the developments that have already occurred around Cambridge are visually intrusive and, in some cases, aesthetically unappealing. We would not want to see these mistakes repeated.

Jobs policies

74. It is clear that the draft Local Plan is focused on the continuation of 'growth' in the Cambridge area. CPRE believes this is a mis-guided approach. The Greater Cambridge area is one which DHSS would consider to have effectively full employment, with just the usual rotation of people out of work or seeking work. Therefore, any growth in jobs will require inward migration to fill them. Inward migration creates pressure on local housing availability and prices, and hence pressure for more house-building. It is an anti-climate cycle.

75. As stated above CPRE would like to see the skills and resources of Cambridge-based organisations used to encourage employment and redevelopment in other regions of the country where housing and water capacity already exist and, in doing so, greenhouse gas emissions would be minimised.

76. CPRE are concerned by policies J/RE: Supporting the rural economy and J/AL: Protecting the best agricultural land. We think both of these policies should be strengthened and properly enforced. The rural economy can be diversified but at its core are farmers and their interests must be protected. For example, the opening up of tracks and bridleways on the scale proposed by the Greater Cambridge Partnership will cause increasing levels of damage to farms and farm equipment and increased security risk to farm properties. It will make illegal activities such as hare-coursing easier and the police enforcement job harder.

77. We think it is in the national interest to stop building on South Cambridgeshire farm land, most of which is Grade 2 with some Grade 3a. <http://publications.naturalengland.org.uk/publication/127056> This land is already needed to assist the minimisation of food imports and it will be even more needed when the Fens flood and national food supply is reduced by an estimated 20 – 25%.

78. According to the NFU, the Fens produce one third of England's fresh vegetables, 20% of England's potatoes, more than 20% of England's flowers and bulbs, 20% of England's sugar beet as well as a significant percentage of the country's cereal, oilseed rape and protein crops. Agriculture in the Fens employs 80,000 people and produces £3bn pa for the rural economy.

79. The government recognises that [the UK currently imports 45% of its food](#); however, some sources estimate this to be [as much as 80%](#). The Environmental Audit Committee has already warned government that the UK cannot continue to rely on food imports on this scale because climate change is going to damage food-growing areas further south.

80. Building on good Cambridgeshire farm land just does not make sense. There may be short-term economic pressures to do so but it is not in the national interest.

81. CPRE supports Policy J/PB: Protecting existing business space and Policy J/RW: Enabling remote working. We also recognise that local affordable workspace can reduce commuting and increase local employment opportunities, Policy J/AW: Affordable workspace and creative industries. We are concerned to ensure that existing buildings which could be used for employment are not demolished to make way for maximum levels of housing and maximum profit for developers as we are aware has occurred in some districts.

82. With respect to Policy J/RC: Retail and centres, CPRE are aware of increasing levels of internet shopping and decreasing footfall in retail centres. This may lead to re-purposing for housing under "Permitted Development". CPRE believes that all such development should be brought back under local authority building control and not be the appalling low-quality free-for-all that it is now.

Homes policies

83. As already expressed above, CPRE's concern is that this draft Plan includes house-building far in excess of necessary or statutory requirements. It appears to be based on a growth agenda which in turn is based upon encouraging unsustainable inward migration to the area.
84. CPRE believes that the greatest housing need is for affordable homes and would like to see Policy H/AH: Affordable housing, strengthened and enforced as far as possible. We would like to see increasing numbers of small sites developed with affordable housing included.
85. CPRE has some concerns about the use of Policy H/ES: Exception sites for affordable housing, because in one district we know of, the exception site rules have been used to approve major, market led, developments posing as community-led exception sites, when they contain the minimum requirement of affordable housing. We trust that South Cambridgeshire will not countenance this deceptive approach through the application of this policy.

Infrastructure policies

86. CPRE are very concerned about current infrastructure proposals for the Cambridge region and the damage and cost they are likely to cause.
87. CPRE strongly opposes the proposed move of the existing Cambridge Waste Water Treatment plant from its current location into the Green Belt. Anglian Water claim in their submission to the Planning Inspectorate requesting a Scoping Opinion that it is local planning authority pressure for the developments in North East Cambridge which is forcing the move. However, in the Scoping Opinion for the proposed relocation prepared by the Planning Inspectorate, on page 6 of Appendix 2, the Shared Planning Service response states: *"We would like to clarify that the relocation of the Cambridge WWTP is not a "requirement" of the North-East Cambridge Area Action Plan and must not be referred to as such. This is because we are not requiring the relocation, but the NEC AAP7 and the emerging joint Local Plan have identified the opportunity that the relocation creates for homes and jobs in the North-East Cambridge area."* So, we can only assume that the North East Area Action Plan can be progressed without the financially and environmentally costly move of the WWTP. This is very welcome news.
88. CPRE believes that the current local government structure in Cambridge and South Cambridgeshire with four different authorities claiming responsibility for some aspects of transport planning and delivery, coupled with the divided responsibility for rail infrastructure between Network Rail and East West Rail Company Ltd, prevents any form of joined-up thinking about transport.
89. CPRE believes that all public transport planning in the county should be practically and actually brought under the control of the Combined Authority with delivery by the County Council, National Highways and Network Rail as appropriate.
90. CPRE are particularly concerned by the activities of the unelected Greater Cambridge Partnership (GCP). Its proposed busways will be a disaster for the countryside and communities and an expensive duplication of facilities that could be provided by road and rail using mostly existing infrastructure. The responsibilities of this body should be re-allocated to those identified in paragraph 89 above in order that the GCP can be disbanded.
91. CPRE are concerned that East-West Rail has failed to consider local transport needs in its planning and as a consequence is currently following a route in Cambridgeshire and Bedfordshire which will maximise damage to the countryside, deliver the least useful local transport facility and not integrate well with the main rail network. Local MPs have taken up this case with government but so far to no avail. The danger is that the Treasury will halt the project because of lack of return on investment and Cambridge will be left without the core of what could have been a climate-friendly metro service.
92. There is a desperate need for an integrated transport plan for the whole county and the current approach will not realise one.

93. CPRE supports Policy I/DI: Digital infrastructure.

Sustainability

94. In 1987, the United Nations Brundtland Commission defined sustainability as *“meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*

95. CPRE does not believe that the draft Local Plan meets this essential test. The use of greenfield land, the effect of water supply on the Cambridge aquifer, the increased flood risk to the Fens caused by the Plan and the lack of an integrated public transport plan are all examples of unsustainability.

Green Belt

96. We are appalled by the proposals to remove further land from the Green Belt, particularly at Babraham and Hinxton. It is also inconsistent with the re-iteration of the purpose of the Green Belt in the statement on Great Places in the Plan.

97. CPRE will strongly oppose all attempts to further erode the Cambridge Green Belt.

98. CPRE should not have to make this statement to planning authorities who should be ensuring full protection of the Green Belt

Summary:

- CPRE are concerned by some aspects of the consultation process, in particular the complexity of the documents provided and the lack of physical access to them, except by post or visits to one of only four locations.
- CPRE are surprised by the timing of the current consultation which clashes with, or is in advance of, other consultations and studies which are relevant to the subject.
- CPRE has commented on individual development proposals where it had sufficient knowledge to make a contribution.
- CPRE are concerned that insufficient attention has been paid to the negative effects on climate change and bio-diversity which will arise from this draft Plan.
- CPRE considers that effects on flooding and food supply of the draft Plan are not in the national interest.
- CPRE considers that this draft Plan is not sustainable, within the UN definition.
- CPRE will oppose all proposed removals of land from the Cambridge Green Belt which is essential to the maintenance of Cambridge as an attractive place for working and living.

Finally, please note that our submission is in respect of the proposed draft Plan. While we have taken every effort to present accurate information for your consideration in our role as a consultee, we are not a decision maker, therefore we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts we have presented.

Yours faithfully,

Alan James BScTech, PhD, CITP, CEnv
Chairman
CPRE Cambridgeshire and Peterborough

cc: Anthony Browne MP
Daniel Zeichner MP
Lucy Frazer MP