
Statement for Matter SC4

Anglia Ruskin University

1. SC4B

Do the Policies in Chapter 6 of the Plan accord with Section 9 of the Framework which relates to protecting Green Belt land?

- 1.1. Policy NH/10 does not accord with paragraph 81 of the NPPF. Paragraph 81 actively seeks to encourage use of the Green Belt for outdoor sport and recreation by stating that *'local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking... to provide opportunities for outdoor sport and recreation'*. Section 9 of the NPPF makes no reference to use of land for outdoor sport and recreation being defined as *'inappropriate development'* in the Green Belt in any circumstance. The only point that this is implied within the Framework is where new buildings for the facilities to serve outdoor sport and recreation would not preserve the openness of the Green Belt or would conflict with the purposes of including land within it (paragraph 89). The use of Green Belt land for outdoor sport and recreation per se is clearly established in Section 9 as an appropriate use in principle. By introducing an additional test of appropriateness, the proposed policy extends beyond the NPPF, without offering any exceptional reasoning (see supporting paragraph 6.38) as to why the national policy is insufficient in this case. It is therefore suggested that point 1 of NH/10 should enforce this principle by reiterating paragraph 81 of the NPPF by stating:

'Proposals in the Green Belt for increased or enhanced opportunities for access to the open countryside ~~and or~~ which provide opportunities for outdoor sport and recreation, ~~appropriate to the Green Belt, will be encouraged where it will not harm the objectives of the Green Belt~~'.

- 1.2. Point 2 of Policy NH/10 conflicts with paragraph 81 of the NPPF as it fails to plan positively to enhance the beneficial use of the Green Belt through opportunities for outdoor and recreation. It is therefore suggested that this point is deleted in its entirety.
- 1.3. Should all parties be minded to consider that additional clarification on how outdoor sport and recreation should be treated within the Development Plan that still accords with national policy in the Framework, an alternative policy wording for NH/10 is as follows:

***'Proposals in the Green Belt for increased or enhanced opportunities for access to the countryside or which provide opportunities for outdoor sport and recreation will be encouraged. New buildings associated with facilities for the use of the Green Belt for outdoor sport and recreation will be considered appropriate development in the Green Belt as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it'*.**

1.4. The above seeks to confirm the 'in principle' support for outdoor sport and recreation within the Green Belt (in line with paragraph 81 of the NPPF), whilst clarifying where new buildings for such uses are appropriate, as defined in paragraph 89 of the NPPF.

1.5. In terms of the supporting text at paragraph 6.38, this misapplies the use of the quotation '*appropriate facilities for outdoor sport and recreation that does not conflict with Green Belt purposes*' by not clarifying that this test only applies to new buildings within the Green Belt. It is therefore suggested that this paragraph is replaced with the following text:

'The NPPF at paragraph 81 requires that local authorities should plan to positively enhance the beneficial use of the Green Belt, including through providing for outdoor sport. Outdoor sport is a characteristic of the Cambridge Green Belt, and given the limited opportunities available for meeting sporting needs in Cambridge and the villages close to the city, this local plan seeks to positively bring forward land within the Green Belt for outdoor sport.'

1.6. The above would reiterate the positive national policy context for such uses and the specific importance of the Green Belt's role to such uses for the Greater Cambridge Region given the existing City constraints, as well as the wider demand across the Region, whilst still allowing a reasonable level of control on a case by case basis.

iv) Given that the provision of appropriate facilities for outdoor sport and recreation is not inappropriate development within the Green Belt should Policy NH/10 be more specific as to which purposes (objectives) of the Green Belt set out in paragraph 80 of the Framework would be prejudiced by cumulative sports and recreation facilities?

- 1.7. It is reiterated that point 2 of policy NH/10 that refers to cumulative development should be removed altogether for the reasons set out in the preceding response.
- 1.8. However, should parties be minded to retain point 2, it is not considered necessary to duplicate the purposes of the Cambridge Green Belt providing that they are referenced within the Local Plan as a whole. It is suggested as beneficial for supporting text to be inserted to confirm where the purposes of the Cambridge Green Belt are identified within the Plan.
- 1.9. It is considered that different areas of the Cambridge Green Belt have different levels of value for the various purposes and so it would not be prudent to make an overriding assumption that certain purposes would be prejudiced by cumulative development of this nature. Instead it is considered that the matter should be considered and assessed based on site specific circumstances at the time of a planning application.