



Interim Planning Appraisal

Cambridge to Haverhill – Cambridge South East Transport project

Prepared by Strutt & Parker on behalf of Greater Cambridge Partnership

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Prepared by:	Sav Patel
Checked by:	David Fletcher
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1. EXECUTIVE SUMMARY

- 1.1 This Interim Planning Appraisal report provides a high level overview on the relevant key planning policy considerations for the proposed Phase 2 section of the Cambridge to Haverhill Travel Hub project. This report should be read in conjunction with the Consideration of Green Belt Issues report by LDA (dated February 2020, which has been appended to this report in Appendix 1.
- 1.2 The Public Transport Link route is likely to be delivered under the Transport Works Act (TWA) which relates to transport infrastructure projects of national significance. The TWA process will require a submission directly to the Secretary of State, rather than to the local planning authorities, although they will be key consultees.
- 1.3 The report has demonstrated that the transport and other objectives of the scheme are strongly supported in both Local and National policy. The Public Transport Link proposals are also fully consistent with the economic and social objectives of the National Planning Policy Framework (NPPF, 2019). The proposals seek to tie in with major employment and housing development, and follow closely the line of the disused railway corridor.
- 1.4 In this regard, transport modelling undertaken to date demonstrates that there is a direct relationship between residential growth, job growth and the Public Transport Link proposals. The scheme would also facilitate significantly better and direct cyclist and pedestrian routes from Cambridge to Haverhill, which is strongly supported in planning terms.
- 1.5 The social and economic benefits of the scheme need to be weighed against the impact in environmental terms, particularly accounting for the location of large parts of the proposed Public Transport Link project route in Phase 2 being situated within the Cambridge Green Belt. In accordance with the requirements of paragraph 146 of the NPPF, the Public Transport Link has a required need for a Green Belt location in order to deliver the key transport objective of providing a fast, frequent and reliable route from Cambridge to Haverhill.
- 1.6 This report, including the LDA Green Belt Assessment, is due to be presented to the Executive Board in 2020.
- 1.7 For background, the strategic objective of the Cambridge South-East Public Transport Link is to reduce congestion and create a fast and reliable public transport link to give local residents an alternative and sustainable mode of transport which would improve journey times and open opportunities to access existing employment sites to the south-east of Cambridge and beyond. A series of route options and Travel Hub locations along the route for Phase 2 have been considered. The off-road route which has been assessed as the highest performing option. The proposed route in the Phase 2 tranche connects the Cambridge Biomedical Campus with three potential Travel Hub sites between Babraham Research Campus and Granta Park.
- 1.8 In terms of the planning policy context, the NPPF sets out the national planning policies for sustainable growth/development. The NPPF provides a framework for local plans to

follow. In terms of the local planning context, the entire Public Transport Link route between Cambridge and Haverhill, falls within the boundaries of Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC). An onward connection of the route to Haverhill, which falls within West Suffolk administrative area is also proposed. Whilst CCC and SCDC's Local Plans were adopted in September and October 2018, respectively, it was a requirement from the Local Plan Inspector to commence work on a joint Greater Cambridge Local Plan at the earliest opportunity. The work on the Greater Cambridge Local Plan has commenced but is at an early stage of its preparation.

- 1.9 To determine if the Phase 2 section of the Public Transport Link scheme is consistent with the adopted Development Plans for CCC and SCDC, it is important to consider if the proposals constitute of "not inappropriate development" or "inappropriate development" within the Green Belt, and whether Very Special Circumstances would be required. Paragraph 146 of the NPPF states that certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.
- 1.10 In accordance with paragraph 146 of the NPPF, the Public Transport Link scheme would fall within the category (c) 'local transport infrastructure, which can demonstrate a requirement for a Green Belt location'. It is also considered that a good case could be made that the proposals are not inappropriate development, subject to the chosen route selected, detailed design considerations, and demonstrating the need for the preferred Travel Hub site to be situated within the Green Belt for sustainable transport reasons.

2. INTRODUCTION

Purpose of the report

- 2.1 The purpose of this Report is to provide an assessment of key planning policy considerations in relation to the delivery of the Cambridge to Haverhill Public Transport Link and Travel Hub project. It specifically assesses the key matters that relate to the principle of the development in planning terms, including the location of the development within the Cambridge Green Belt. It has been prepared specifically in relation to Phase 2, which is an off-road option, which closely follows the line of the disused railway and the Travel Hub options. This section of the report provides background on the route options that have been/are being assessed as part of the busway project.
- 2.2 This report should also be reviewed in the context of the Consideration of Green Belt Issues prepared by LDA dated February 2020, which forms Appendix 1 of this report.
- 2.3 The report will be used to inform the decision making process on the preferred route and Travel Hub and should also be reviewed in conjunction with the Outline Business Case, prepared by Mott MacDonald.

Description of Proposal

- 2.4 It is understood that for Phase 2 the Public Transport Link will be a two way hard running surface with a maximum width of 7.3 metres excluding the 3 metres wide pedestrian and cycle paths either side and any additional land for landscape and ecological mitigation, such as hedgerow planting. Phase 2 also includes Travel Hubs that will provide approximately 2,000 car parking spaces and 200 cycle parking spaces. The scheme would be designed to accommodate existing public rights of way that either cross or run adjacent to it.
- 2.5 As part of this appraisal, a total of five Public Transport Link route options and three Travel Hub locations and associated infrastructure including a bridge over the A11 have been considered. Although for large parts of the route two options have been considered.
- 2.6 However, at this stage the route options are still indicative and will require further detailed design work as a preferred option is identified and the alignment becomes fixed.

Overview of City Deal and Consultant Team

- 2.7 This report has been written by Strutt & Parker on behalf of the Greater Cambridge Partnership City Deal partners.
- 2.8 The Greater Cambridge Partnership is an agreement that has been set up between a partnership of local organisations and central government, to help secure future economic growth and quality of life in the Greater Cambridge City Region. The Greater Cambridge Partnership are responsible for promoting and securing the delivery of the proposed Public Transport Link. The Greater Cambridge Partnership consists of the following organisations:

- Cambridge City Council;
- Cambridgeshire County Council;
- South Cambridgeshire District Council;
- University of Cambridge; and
- Greater Cambridge and Peterborough Local Enterprise Partnership.

2.9 The vision for the deal is to make it easier to travel in, out and around Cambridge and South Cambridgeshire by public transport, cycle or on foot, and reduce and maintain lower traffic levels to ease congestion, which the Public Transport Link project could form part of. Further information on the City Deal, can be found on the Greater Cambridge Partnership City Deal website.

Timetable

2.10 The proposals for the Public Transport Link and Travel Hub are currently still at feasibility stage following public consultation stages. There is commitment from the Greater Cambridge Partnership for promotion of the scheme. Based on the current programme, the results of the latest consultation and route will be presented to the GCP Executive Board later in 2020. The Board will then decide whether or not to progress the scheme and decide on which is the preferred Travel Hub option.

2.11 If the Board decide to move forward with the Public Transport Link scheme, then an application to obtain the statutory consent will be made with the anticipation of obtaining consent between 2021 and 2022. With this in place, work is expected to commence on the Public Transport Link scheme in 2023. Further information on the process is contained within section 3 of this report.

3. THE PROPOSAL AND ROUTE OPTIONS

- 3.1 The proposed Public Transport Link scheme is to provide an off-road public transport link between Cambridge and Haverhill. The link would also make provision for walking, cycling and horse riders which would sit alongside the new route. The section of the route that is being assessed in this report is the Phase 2 element. Work and assessment on the rest of the route linking to Haverhill from the Travel Hub locations will be explored in detail in the next stage.
- 3.2 The proposed Public Transport Link route would link the Cambridge Biomedical Campus via Great Shelford, Stapleford and Sawston to a new Travel hub near the A11/A1307/A505 with connections to Babraham, the Babraham Research Campus and Granta Park. The route would be entirely off-road, only interacting with other traffic at junctions. Junctions between existing roads and the new public transport route would be controlled by traffic lights. The Public Transport Link would also connect to the existing busway enabling services to continue to the station and city centre.
- 3.3 The Public Transport Link is proposed to be a two way hard running surface route with a maximum width of 7.3 metres, excluding the 3 metres wide shared use path on both sides and any additional land for landscape and ecological mitigation, such as hedgerow planting. Further detailed design work will be required once the preferred route option is identified.
- 3.4 Currently two route options from the Cambridge Biomedical Centre are being considered. The proposed route (by County) and Robinson Way Alternative route (which was suggested by 5th Studio architects in response to the 2019 consultation).
- 3.5 The proposed route would connect into the Francis Crick Avenue roundabout where it would spur south to align with the railway line avoiding the Nine Wells Local Nature Reserve, where it would then project away from the railway line and around the northern side of Great Shelford and Stapleford. The route then aligns with the route of the disused railway line.
- 3.6 The Robinson Way Alternative route would spur south off Dame Mary Archer Way to the rear of Addenbrookes Hospital and extend into Whites Hill and Clarke's Hill fields. It would then snake in between the northern boundary of Nine Wells House and White's Hill House on Graham's Road and the southern boundary of Kingfisher Cambridge South Chalets site on Hinton Way.
- 3.7 The alternative route and proposed route would then merge at Hinton Way were the proposed route then continues over Great Shelford and Stapleford before heading towards the dismantled former railway line which extends across the northern perimeter of Sawston. The route then splits into five other routes to serve the travel hubs options. Please refer to the figures within the LDA Green Belt report for further detail.
- 3.8 The route includes five proposed stop locations:
- Starting/ending at the Biomedical Campus;

- North of Great Shelford (Hinton Way);
- East of Great Shelford (Haverhill Road);
- North-east of Sawson (Sawston Road); and
- South of A11 Junction.

3.9 Three locations are being considered for a proposed new Travel Hub, which are:

- Site A – west of the A11 and north of the route of the old Cambridge – Haverhill railway with access from the A505.
- Site B – between Babraham and the A11 with access from the A1307.
- Site C – north of Little Abington, with access from the A1307 opposite the existing Four Went Ways service station junction.

3.10 The Travel Hubs will provide a minimum of 2,000 car parking spaces and 200 cycle parking spaces.

3.11 Other options for the route between the Cambridge Biomedical Campus, Sawston and the Travel Hub locations have been considered and were assessed. These included variations of an off-road route as well as options on or alongside the A1307. These options were consulted on in 2018 and the results of that consultation showed strong support for the proposed off-road solution. These proposals presented here for consultation are on the more detailed route proposals, alternatives for crossing the A11 and proposed Travel Hub sites.

3.12 An alternative route alignment running through the centre of villages or following the old railway alignment south of Stapleford was not found to be feasible because of space constraints in Great Shelford and the greater impacts on residential properties and businesses. It would also be significantly more expensive and disruptive during construction given its closeness to the mainline railway.

3.13 Therefore, the current proposed route for Phase 2 which partly closely follows the corridor of the disused railway line and extends north of Great Shelford, Stapleford and Sawston was considered the most suitable. Further information on this, is set out within the Outline Business Case.

Aims and objective of Public Transport Link scheme

3.14 The key objectives and benefits of the scheme include:

Objectives:

- Bring vital transport improvements to key transport corridors into Cambridge City in order to reduce traffic levels and congestion;
- Enhance the environment, streetscape and air quality;
- Provide safer and more convenient routes for cycling; and
- To maintain existing levels of pedestrian connectivity.

Benefits:

- To provide a fast and more reliable way to travel into Cambridge City Centre;
- To support the delivery of new homes across South Cambridgeshire outside of the Green Belt;
- Support access to key employment and job creation; and
- Improve local public transport infrastructure.

3.15 It is recognised in that achieving the above aims and objectives, the proposals need to give due and detailed consideration to a number of detailed planning and environmental considerations. This includes accounting for the following:

- To protect and safeguard the objectives of the Green Belt and protect the character of the countryside;
- The need to protect the historic setting of Cambridge and other heritage assets, such as the setting of listed buildings along the route.
- The need to minimise the impact of the scheme on the wider landscape;
- The need to protect existing residential amenity; and
- Consideration of other material planning considerations, such as ecological, arboricultural, light and noise & air quality pollution considerations.

3.16 This list is not exhaustive and it is the intention to undertake detailed work on a wide range of environmental and planning matters. This will inform whether the Public Transport Link project in the area of search is acceptable in planning terms and it will also inform the most appropriate route for the Public Transport Link.

4. PLANNING POLICY CONSIDERATIONS

- 4.1 This section sets out the key planning policy considerations that are relevant to the Public Transport Link project and an overview of the planning process.
- 4.2 The intention is to deliver the Public Transport Link under the Transport and Work Act Order (referred to as a TWAO) made under the Transport and Works Act 1992 (TWA). The TWA relates specifically to transport projects to construct and operate railways, tramways and other guided transport systems, and works which interfere with navigation rights. In this regard, if the proposed Public Transport Link scheme employs a guided system, it will fall under the definition of a guided transport system within the scope of the TWA.
- 4.3 The process for TWAOs is different from the usual planning process of applying for applications to the relevant local planning authority. Decisions on applications for TWAOs are made by the Secretary of State, rather than to local planning authorities, but the local planning authorities will still be a key consultee. All interested parties have the opportunity to have their say and are fully consulted on the proposals, prior to any decision being made.
- 4.4 In a TWAO application, it is likely that the proposals will be considered at public inquiry, where interested parties will have the opportunity to have their say. Following any public inquiry, the Secretary of State will take into consideration the representations made, in accordance with national and local planning policy.
- 4.5 As a next stage, further consultation will be undertaken with the general public and a range of statutory consultees prior to any submission of a Transport for Works Act application. This is will include commencing work on the Environmental Impact Assessment (EIA) process. It is likely that linked to the TWA process, the Secretary of State will be asked to direct that planning permission for the Public Transport Link project is deemed to be granted.

Overview of Development Plan

- 4.6 The section has been prepared having regard to Section 38(b) of the Planning and Compulsory Purchase Act (2004), which states that if regard is to be had for the development plan for the purposes of determination to be made under the Planning Acts, determination must be made in accordance with the development plan unless material considerations indicate otherwise. In this instance, being a transport project, subject to TWAO process, it does not need to fully accord with the Development Plan. The Development Plan is nonetheless a material consideration.
- 4.7 The Public Transport Link project is a cross-border project that is located within the jurisdiction of both South Cambridgeshire District Council and Cambridge City Council authority areas. Therefore, the adopted and emerging Development Plan relates to both Authorities.

Adopted Development Plan

- 4.8 The adopted Development Plan for the two authorities that is of relevance to the Public Transport Link principally consists of the following documents:
- Cambridge City Council Local Plan Local Plan (2018);
 - South Cambridgeshire District Council Local Plan (2018);
 - Cambridgeshire County Council Minerals and Waste Core Strategy Development Plan Document (July 2011) and Site Specific Proposals (February 2012); and
 - Cambridgeshire County Council Local Transport Plan (June 2017).
- 4.9 The Cambridge to Haverhill Public Transport Link scheme is a cross-border project that is located within the jurisdiction of Cambridge City Council, South Cambridgeshire District Council and West Suffolk Council (Haverhill section) authority areas. However, the Phase 2 route and Travel Hub locations do not fall within West Suffolk. Therefore, the adopted and emerging Development Plan of Cambridge City and South Cambridgeshire Councils apply for Phase 2.
- 4.10 Cambridge City Council and South Cambridgeshire District Council have adopted their Local Plans (September and October 2018, respectively). Both Local Plans retain Green Belt policies (Policy 4 and Policy NH/8, respectively).
- 4.11 A number of policies in the Development Plan are of relevance to the Public Transport Link project. In addition, both authorities have also adopted a number of Supplementary Planning Documents that are also of relevance to the proposals.

Emerging Local Plan

- 4.12 Cambridge City Council and South Cambridgeshire District Council are in the process of preparing a new Greater Cambridge Local Plan which is at an early stage of its preparation. The Councils are consulting on 'The First Conversation' (Issues and Option stage) of the local plan preparation and inviting responses/comments on big themes such as housing, employment and infrastructure.
- 4.13 According to the latest Local Development Scheme (2019), the timetable for adopting the Greater Cambridge Local Plan is Summer 2023. Therefore, at this stage, the relevant Development Plan is that listed above.

Local Transport Plan

- 4.14 In May 2017, a Mayor was directly-elected and the Cambridgeshire and Peterborough Combined Authority (CPCA) was formed as part of the devolution deal agreed with Central Government. The CPCA now has the strategic transport powers and is the Local Transport Authority for the Cambridgeshire and Peterborough area. The Mayor sets the

overall transport strategy for Cambridgeshire and Peterborough, called the Interim Local Transport Plan.

- 4.15 While a new CPCA Local Transport Plan is being prepared for the CPCA area, an interim document – an amalgamation of Cambridgeshire County Council and Peterborough City Council’s Local Transport Plans – was adopted by the CPCA in June 2017 as a single plan for the whole area.
- 4.16 Transport Delivery Plan is a three-year programme of planned highway and transport schemes that are proposed to be delivered within this timeframe. The Transport Investment Plan sets out the transport infrastructure and service initiatives that are required to support the growth of Cambridgeshire. The Public Transport Link project form identified is in the investment plan as a Bus Stop Accessibility Improvements and Road Safety Improvements (ref: 161 and 161) for the A1307 corridor between Addenbrooke’s and Haverhill.

National Planning Policy Framework

- 4.17 At national level, the key planning policy document is the National Planning Policy Framework (NPPF), which is a key expression of national policy for the consideration of planning applications. The following sections are of relevance:
- 2. Achieving sustainable development;
 - 5. Delivering a sufficient supply of homes;
 - 6. Building a strong, competitive economy;
 - 8. Promoting healthy and safe communities;
 - 9. Promoting sustainable transport;
 - 13. Protecting Green Belt land;
 - 14. Meeting the challenge of climate change, flooding and coastal change;
 - 15. Conserving and enhancing the natural environment; and
 - 16. Conserving and enhancing the historic environment.
- 4.18 There are several paragraphs within the NPPF, which are of direct relevance and will provide the key basis at national level for determining the suitability of the Public Transport Link project. The key parts of the NPPF having regard to the principle of the Public Transport Link project, are discussed within section 5 of this report. However, the key consideration for Phase 2 will be the impact on the openness and purposes of the Green Belt.

4.19 Sitting alongside the NPPF is the National Planning Practice Guidance (NPPG) which brings together all planning guidance into one place and is also a relevant consideration. Reference to the relevant guidance will be provided in section 5

National Planning Policy Guidance

4.20 In addition, the National Planning Practice Guidance on Green Belt was published in July 2019. This identifies matters that may need to be taken into account when assessing the impact of proposals on Green Belt, including:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

4.21 However, since then a landmark Supreme Court judgement has been made in relation to visual impact and the openness of the Green Belt. The judgement ruled that reference to openness in paragraph 146 of the NPPF *"does not imply freedom from any form of development"* and *"is not necessarily a statement about the visual qualities of the land"*. However, the ruling does indicate that visual impact can still be relevant to the question of whether openness will be preserved. This judgement will have implications on how the Council interprets visual impact and openness. A copy of the judgement is contained in Appendix 3.

Case Law

4.22 There have been several recent appeal decisions relating to the interpretation of inappropriate development within the Green Belt. These are of particular relevance having regard to whether the proposed development can be considered to be not inappropriate development within the Green Belt or whether 'Very Special Circumstances' are required to apply.

4.23 In this regard, there has been a recent high court judgment and appeal decision relating to mineral extraction proposals in the Green Belt, which has helped to provide some clarity to the interpretation of paragraph 146 which can be applied to the proposals. Interestingly, there is very limited case law relating to transport infrastructure proposals in the Green Belt such as that proposed here.

4.24 Below is a summary of these high court judgment and appeal decisions which highlight the main issues raised and how they could relate to the proposed Cambridge to Haverhill scheme. This will help to guide policy discussion.

Relevant Green Belt appeals decisions:

High court challenge and subsequent Supreme Court Challenge brought by Samuel Smith Old Brewery (Tadcaster) and Oxton Farm against North Yorkshire County Council and Darrington Quarries Ltd – Jackdaw Crag Quarry, Strutton, Tadcaster, North Yorkshire, LS24 9BE.

- 4.25 This is a case involving minerals in which visual impact was considered. The site is a Magnesian Limestone quarry. Permission was approved for an extension of it. The permission was challenged by Samuel Smith and Oxton Farm initially in the high court, which was then quashed in the Supreme Court. The High Court considered that the case officer of the Council misdirected the committee on the policy for mineral development in the Green Belt. This resulted in the committee approaching the decision on the basis that the proposal was not for inappropriate development in the Green Belt and therefore did not have to be justified by 'very special circumstances'.
- 4.26 The argument was that the case officer had not considered the visual dimension of openness. The officer had considered visual impact under a separate section to the Green Belt considerations and found that there would be visual harm but that this was outweighed by social and economic benefits. Under the Green Belt discussion, the officer considered openness in purely spatial terms and did not consider visual impacts on openness.
- 4.27 Related to this high court judgement is a supreme court judgement (***R (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant)***) (February 2020) for the same case, in which it was confirmed that

"There was no error of law on the face of the report. Paragraph 90 [146] does not expressly refer to visual impact as a necessary part of the analysis, nor in my view is it made so by implication. As explained in my discussion of the authorities, the matters relevant to openness in any particular case are a matter of planning judgement, not law."

- 4.28 Importantly, in relation to the interpretation of paragraph of paragraphs 89-90 of the NPPF and the Supreme Court judgement references that they replace a rather fuller statement of policy for the "Control of Development" in section 3 of PPG2. It is stated in the Supreme Court judgement that section 3 of PPG2 covers substantially the same ground respectively as NPPF 89 and 90, but in rather fuller terms. In the view of the Supreme Court:

'In the shortened version of the NPPF these categories (within section 3 of PPG2) have been recast in para 90, and brought together under the same proviso, including the requirement to preserve openness.'

I do not read this as intended to mark a significant change of approach. If that had been included, one would have expected it to have been signalled more clearly. To my mind the change is explicable as no more than a convenient means of shortening and simplifying policies without material change.'

4.29 Therefore, whilst this case does not alter the existing interpretation of the National Planning Policy Framework, it is a helpful reminder of the principle that discretion should be given to decision-makers. In addition, given the lack of available case law on Transport Infrastructure Projects within the Green Belt since the publication of the NPPF, it also provides a clear steer that PPG2 is a very helpful reference point to define whether a Transport Infrastructure Project can be considered as not inappropriate development within the Green Belt.

4.30 This is considered in section 5 below.

4.31 Recent appeals decisions have also established that openness should be assessed both in terms of visual impact and spatial impact & provided interpretation in regard to paragraph 90 of the NPPF. The relevant decisions, which are not assessed in detail here are as follows:

Turner v Secretary of State for Communities and Local Government and Another [2016] EWCA Civ 466 – land at Barrack Road, West Parley, Ferndown, Dorset.

Summary of Europa Oil and Gas Ltd v Secretary of State for Communities and Local Government & Ors [2013] EWHC 2643 (Admin) (25 July 2013) – Bury Hill Wood, Coldharbour Lane, Holmwood, Surrey, RH5 6HN.

Summary of RJD Ltd and Gowling WLG Trust Corporation Limited v Secretary of State for Communities and Local Government (4 April 2019) – Land at Ware Park, Wadesmill Road, Hertford.

4.32 Some commentary on the above case law and its relevance to the proposed Public Transport Link scheme is set out in section 5 of this report. This is particular in relation to the recent Supreme Court judgement on the Samuel Smith case, and the reference to use of PPG2 to assist the case of whether proposals can be considered as not inappropriate development within the Green Belt.

5. PRINCIPLE OF THE PUBLIC TRANSPORT LINK SCHEME

- 5.1 This section of the report provides an overview planning appraisal in relation to the Public Transport Link project in planning policy terms, accounting for the relevant adopted Development Plan policies at a Local level and National guidance and material considerations. In accordance with paragraph 11 of the NPPF, plans and decisions should apply a presumption in favour of sustainable development.
- 5.2 For decision making, this means:
- Approving development plans that accord with an up to date development plan without delay; or
 - In this instance both the South Cambridgeshire District Council and Cambridge City Council Development Plans are up to date. Therefore, to establish if the principle of the Cambridge to Haverhill Public Transport Link is acceptable in planning terms, it is important to consider if the proposals accord with the adopted Local Plans and adopted national policy.
- 5.3 This report does not provide a recommendation on the preferred option in planning terms. The preferred route and Travel Hub option will be dependent upon deliverability and securing an option that provides the required transport objectives of the scheme, and the appropriate balance with other planning considerations. This report contains a high level overview of the principle of the Public Transport Link development, followed by an analysis of key issues associated with the different route options.
- 5.4 This report will examine the Public Transport Link development based upon the information available, followed by an analysis of key issues associated with the different route and Travel Hub options and their effects on the Green Belt.
- 5.5 It is also worth noting that with this development being submitted under the Transport for Works Act Order, unlike a planning application it is not required to be in accordance with the Development Plan. Nonetheless, an assessment of the proposals in relation to the Development Plan and in particular an assessment in Green Belt terms is an important material consideration.

Sustainable Development

- 5.6 To establish if the Public Transport Link scheme is a sustainable development, the impact of the Public Transport Link upon the Green Belt is a key matter to consider. The NPPF sets out within paragraph 11 that there are three dimensions to sustainable development, namely: economic, social and environmental. The definitions of the three dimensions are set out as follows:
- **An Economic Role** – contributing to building a strong, responsive and competitive economy. This includes supporting growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- **A Social Role** – contributing strong vibrant and healthy communities. This includes the need to create high quality built environment, with accessible local services that reflect the communities needs and support its health, social and cultural well-being; and
- **An Environmental Role** – contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

5.7 The NPPF is clear that the three dimensions should not be considered in isolation and that each is mutually dependent on the other two. In addition, the NPPF also sets out that proposals, which accord with the Development Plan should be approved without delay. When considering the principle of the Public Transport Link scheme the three dimensions of sustainable development are of particular importance.

5.8 When considering if the Public Transport Link is ‘sustainable development’ and whether in principle of development accords with the Development Plan, one of the key planning policy matters to address is its location in the Cambridge Green Belt.

5.9 The Green Belt has a strong protection at both National and Local Level. Policy 4 (The Cambridge Green Belt) of the adopted Cambridge City Local Plan (2018) and Policy S/4 (Cambridge Green Belt) of the South Cambridgeshire District Council Local Plan states new development will only be approved in line with the Green Belt policy in the NPPF.

5.10 Policy NH/8 (Mitigating the Impact of Development in and adjoining the Green Belt) of the South Cambridgeshire Development Control Local Plan (2019) states development must be located and designed to not have an adverse effect on the rural character and openness of the Green Belt. Where development is permitted, particularly on the edge of settlements, it must be of high quality design and landscaping conditions will be attached to ensure the impact on the Green Belt is mitigated.

Transport Benefits of the Scheme

5.11 Prior to considering the compliance of the Public Transport Link route and Travel Hub options with adopted planning policies, it is important to assess the merits of the scheme in transport terms.

5.12 Section 9 of the NPPF sets out detailed guidance in relation to the promotion of sustainable transport in terms of policy development and consideration of development proposals. Paragraph 103 states sets out that the planning system should actively manage patterns of growth to promoting the objectives of sustainable modes of transport. It goes onto the state that by doing this it can help to reduce congestion and emissions, which would improve air quality and public health. In terms of considering development proposals, paragraph 109 states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safely.

- 5.13 In the context, paragraph 110 states that application for development proposals should give priority to pedestrian and cycle movements to facilitate access to and encourage the use of public transport; address needs for people with disabilities and reduced mobility in relation to all transport modes; create places that are safe, secure and attractive and respond to local character and design standards; allow provision for efficient delivery of goods, and access by services and emergency vehicles; and designed to enable charging of plug-in and other ultra-low emission vehicles, in safe, accessible and convenient locations.
- 5.14 Policies 80 and 81 of the adopted Cambridge City Council Local Plan (2018) and TI/2 of the South Cambridgeshire District Council Local Plan (2018) set out support for the promotion for walking and cycling, infrastructure improvements and promotion of sustainable transport. This is cross referenced to the objectives of the adopted high level Transport Strategy for Cambridge and South Cambridgeshire (2014).
- 5.15 The Cambridge to Haverhill Public Transport Link and Travel Hub scheme aims to facilitate fast, frequent and reliable journeys by bus between Cambridge and Haverhill in order to accommodate trips from new and existing developments, as well as to encourage modal shift for those already travelling along the A1307 and other routes by private car.
- 5.16 The main benefits of the Public Transport Link project will lead to reduced congestion entering Cambridge from the east, improve air quality, link villages together with a high quality public transport connections, improve junction's safety through highway improvements and provide high quality walking and cycling facilities. It provides better connections between where people live in villages and where they work. A number of studies, looking at route options, have been conducted in order to explore options for meeting the scheme aims.
- 5.17 The Public Transport Link scheme will not only serve residents along the corridor to commute into and out of Cambridge, but also provide a sustainable public transport connection with two major employment parks at Babraham Research Campus and Granta Park. This helps to reduce congestion to these sites during peak times and improve capacity on the highway network.
- 5.18 The current bus journey times between Sawston and Cambridge is between 43 to 53 minutes and 23 to 33 minutes between Sawston and The Biomedical Campus. The Public Transport Link scheme is expected to reduce these journey times to 30 to 32 minutes and 10 to 12 minutes respectively. The reduction in journey times is principally due to having an off line route that is not prejudiced by direct conflict with other road users and traffic levels.
- 5.19 This report will feed into the Outline Business Case for the project, which will set out in detail the transport benefits of the project and is being prepared by Mott MacDonald.

Walking and Cycling

- 5.20 The Cambridge to Haverhill Public Transport Link scheme aims to promote sustainable travel into Cambridge from surrounding settlements, particularly from the east. The

scheme would also seek to provide a cycling and walking facility along the Public Transport Link and improve existing links/connections to the Public Transport Link. Cambridge has a well-established and growing cycling culture, therefore it is considered that cyclists are a major target user group when implementing the scheme. Pedestrians should also be encouraged to walk to bus stops to further reduce environmental impacts.

- 5.21 There are networks of footpaths within Little and Great Abington, Sawston, Great Shelford that are likely to promote walking to potential Public Transport Link stops. However, currently there is no defined pedestrian or cycle routes along the length of the proposed Public Transport Link corridor.
- 5.22 The Linton Greenway would provide this. It would be an off-road route for cyclist, pedestrian and equestrian connecting Linton with Cambridge Biomedical Campus. The Greenway will form part of the Public Transport Link scheme and provide a multi-user path alongside the A1307. The Greenway forms part of the Phase 1 works to the Public Transport Link scheme and work has already commenced on junction improvements on the A1307 with Linton High Street. This will be delivered as part of a separate planning application. The Phase 2 works will deliver a new Travel Hub, which will give the ability to cycle (as well as use public transport) to gain access to the Biomedical Campus and Cambridge City Centre.
- 5.23 The transport benefits of the scheme are considered to be fully consistent with the policy objectives set out within section 9 of the NPPF and policies 80 and 81 of the adopted Cambridge City Council Local Plan and TI/2 of the South Cambridgeshire District Council Local Plan and are a strong material consideration in favour of the proposals.
- 5.24 In addition, paragraph 141 of the NPPF relates to Green Belt, and sets out that local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access. The Public Transport Link scheme would promote access into the Green Belt, which is supported under paragraph 141 of the NPPF. The proposed cycle and pedestrian routes along the scheme are considered to be a strong material planning consideration in favour of the proposals.
- 5.25 The NPPF states that the government attaches great importance to Green Belts and their essential characteristics are their openness and permanence. Paragraph 141 provides that in planning positively to enhance the beneficial use of the Green Belt, authorities should look for opportunities to provide access and sport/recreation, and to retain and enhance landscapes, visual amenity and biodiversity. The proposed scheme will provide enhanced access into the Green Belt, which is a material consideration in favour of the proposals.
- 5.26 This report will feed into the Outline Business Case for the project, which will set out in detail the transport benefits of the project and is being prepared by Mott MacDonald.
- 5.27 With the transport benefits of the scheme being clear, it is important to consider the proposals in overall terms having regard to adopted planning policy at both a national local level.

Assessment of Public Transport Link scheme

- 5.28 The entire Public Transport Link scheme for Phase 2, with the exception of a small sections of the County and Robinson Way Alternative route options and Travel Hub C, is located within the Cambridge Green Belt. Policy 4 of the Cambridge Local Plan and policy S/4 of the South Cambridgeshire Local Plan defers to the advice contained in the NPPF. However, policy NH/8 of the South Cambridgeshire Local Plan provide further requirement for new development than policy S/4. It states that any development proposals within the Green Belt must be located and designed to avoid having an adverse effect on the rural character and openness of the Green Belt. Where development is permitted landscaping will be used to ensure the impact on the Green Belt is mitigated.
- 5.29 It is important therefore to establish if the proposal is not inappropriate development in the Green Belt and can demonstrate a need for a Green Belt location.
- 5.30 The NPPF states that the government attaches great importance to Green Belts and their essential characteristics are their openness and permanence. Paragraph 141 provides that in planning positively to enhance the beneficial use of the Green Belt authorities should look for opportunities to provide access and sport/recreation, and to retain and enhance landscapes, visual amenity and biodiversity.
- 5.31 Paragraph 143 of the NPPF states that inappropriate development is by its definition harmful to the Green Belt and should not be approved except in 'very special circumstances'.
- 5.32 Paragraph 144 of the NPPF states that when considering planning applications, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'very special circumstances' will not exist unless potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.33 Paragraph 145 states that local planning authorities should regard the construction of new buildings as inappropriate within the Green Belt. There are a limited number of exceptions to this. The proposed Public Transport Link is not envisaged to require any new buildings but some temporary provision for construction purposes may be required. However, there is likely to be a requirement for a small building, to provide toilets and a small seating area within the Travel Hub
- 5.34 One of the key paragraphs to consider in relation to the proposed development, is Paragraph 146 of the NPPF which states the following:

'Certain other forms of development are also not inappropriate within the Green Belt provided that they preserve its openness and do not conflict with the purposes of including land within it. These are:

- a) *Mineral extraction*
- b) *Engineering operations*

- c) **Local transport infrastructure which can demonstrate a requirement for a Green Belt location**
- d) *The re-use of buildings provided that the buildings are of permanent and substantial construction*
- e) *Material changes to the use of land (such as changes of use for outdoor sports or recreation, or for cemeteries and burial grounds); and*
- f) *Development brought forward under a Community Right to Build Order or Neighbourhood Development Order.*

5.35 The scheme falls within the definition of part c) a Local Transport Infrastructure project and therefore falls within the list of developments within paragraph 146, provided that it can be considered to demonstrate a requirement for a Green Belt location.

Requirement for a Green Belt Location

5.36 In accordance with paragraph 146 of the NPPF, the starting point for consideration of the acceptability of the proposed Public Transport Link scheme within the Green Belt, is whether the proposed development has a requirement for a Green Belt location.

5.37 In planning terms, as Cambridge is surrounded by Green Belt, it would not be possible for a new off-road public transport route to be provided without not requiring a Green Belt location. The alternative approach would be to utilise the existing road network to provide the Public Transport Link scheme. As set out in the Outline Business Case, prepared by Mott MacDonald, this option has been discounted due to cost and not meeting with the objectives of the scheme for a fast, direct and reliable public transport route. Further information on this is provided within the Outline Business Case, prepared by Mott MacDonald.

5.38 The on-road route option would involve significant alterations and disturbance to the existing road network and installation of additional infrastructure (signage and possibly gantries) to an already congested corridor into Cambridge during peak times. The on-road option would result in some widening of the existing carriageway within the Green Belt and requires work within a Green Belt location. The works for the on-road options would also have a direct impact upon the setting of the Gog Magog Site of Special Scientific Interest (SSSI). It is therefore not possible to deliver the Public Transport Link project that meets the transport objectives of the scheme outside of Green Belt land.

5.39 The off-road route has the benefit of the potential to include a 'green lane' design treatment along its entire length to enhance biodiversity through creation of habitats. Such benefits would not be achievable with an on-road route. Therefore, a Green Belt location is essential to achieve the strategic objectives of the Cambridge to Haverhill Public Transport Link route in terms of journey times and reliability.

- 5.40 The proposals are therefore considered to be fully compliant with paragraph 146 in respect of the route needs to be delivered on Green Belt land and there are no available and better alternative options outside of the Green Belt which would achieve the objectives and benefits of the scheme.
- 5.41 Indicative landscaping proposals along the route have been prepared to show the potential location for planting to mitigate the impact of the route. This includes the introduction of woodland areas, hedgerows and grassland, particularly to the stops and Travel Hubs.
- 5.42 In terms of the Travel Hub options, sites A and B are located within the Green Belt and site C is outside. Site C would however require a bridge across the A11 to access it which would be located within the Green Belt. Due to the requirement for a bridge over the A11, site C would also be the most expensive option. Two route options over the A11 have been considered and both would need to ramp up creating a visual intervention within the Green Belt to serve site C.
- 5.43 The A11 roundabout provides an ideal location for Travel Hubs to capture as much traffic as possible including traffic travelling along the A1307, in an accessible and convenient location. Links would be created off existing road networks to serve the hubs. The benefit of sites A and B is that they are located west of the A11 in the direction of traffic heading towards Cambridge, whereas site C is located on the eastern side of the A11 and so would be less convenient in terms of accessibility and connectivity. Therefore, all three hubs can demonstrate a Green Belt location, albeit site C is not within the Green Belt but would require a bridge to access it which would be located in the Green Belt. Any Travel Hub that is located away from and to the east of the A11/A1307 junction, would not meet the transport objectives of the scheme, given the majority of the demand will be from trips from the A11.

Openness and Purposes of including land within the Green Belt

- 5.44 With the need for a Green Belt location being established, it is now important to consider if the proposals can be considered as not inappropriate development in the Green Belt or whether Very Special Circumstances are considered to be required.
- 5.45 To fully consider whether or not the Public Transport Link scheme is 'not inappropriate' development, the key determining factors as set out in paragraph 146 of the NPPF, is whether the scheme:
- Preserves the openness of the Green Belt; and
 - Conflicts with the purposes of including land in the Green Belt.
- 5.46 The NPPF sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 5.47 Paragraph 134 set out the national purposes for including land in the Green Belt are:

1. To check the unrestricted sprawl of large built- up areas;
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.48 In addition to the 5 purposes of the Green Belt at National level, it is important to consider the three purposes of the Cambridge Green Belt, which are defined within Policy 4 of the adopted Cambridge Local Plan (2018) and Policy S/4 in the adopted South Cambridgeshire Local Plan, as follows:

1. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
2. Maintain and enhance the quality of its setting; and
3. Prevent communities in the environs of Cambridge from merging into one another and with the city

5.49 There are two elements of the Public Transport Link scheme for consideration in relation to openness and purposes for including land in the Green Belt, the proposed route options and Travel Hub locations. The associated works, such a signage, lighting, crossings and bridges have also been taken into consideration. However, at this stage, the details of these features are not as advanced as the location of the route and Travel Hub options & therefore assumptions have been made.

5.50 When considering if the Public Transport Link scheme preserves the openness of the Green Belt or conflicts with the purposes of the Green Belt, it is important to acknowledge that preserving the openness of the Green Belt is different from harm to the Green Belt. Development within the Green Belt, by its definition will cause some harm to the Green Belt, but harm in itself does not necessarily mean that the development will not preserve the openness of the Green Belt or conflict with its purposes.

5.51 Secondly, it is clear that in policy terms the NPPF does seek to define transport schemes as 'not inappropriate' within the Green Belt. If permission is granted for the Public Transport Link it will not change its designation as Green Belt land. Clearly, the NPPF contemplates that it is possible to deliver a transport scheme within the Green Belt which neither affects openness nor the purposes of including land in the Green Belt.

5.52 In assessing, this impact, having regard to the recent Supreme Court decision on the Samuel Smith case (refer to section 4), section 3 of PPG2 is considered to be of relevance. Section 3 of PPG2, provided detailed guidance, particularly in relation to park and ride

facilities. Paragraph 3.17 lists a set of 5 criteria that park and ride (or Travel Hub) facilities would have to meet in order to be not inappropriate development in the Green Belt.

- 5.53 To inform the impact of the Public Transport Link project in terms of openness and purposes of including land within the Green Belt, a detailed consideration of Green Belt Issues Report (2020), has been completed by LDA Design. This report contains a detailed analysis that the impact the Public Transport Link project will have, and provides an assessment of the route options and Travel Hub options.
- 5.54 LDA carried out the Green Belt study of the Cambridge Green Belt, which form part of the evidence base for the Cambridge Local Plan and South Cambridgeshire Local Plan which is the key local plan for this scheme. Therefore, they have used this study to inform their assessment of the proposed scheme and for consistency, they have used the same methodology which was used to assess the route options and Travel Hub sites for the Cambourne to Cambridge busway scheme.
- 5.55 The Green Belt report by LDA has assessed the harm of both the on-road and off-road options and provides a conclusion on which would have the least impact while achieving the strategic objectives of the Cambridge to Haverhill scheme. This report, is an important element to inform if one or more of the route options could be considered as not inappropriate development in the Green Belt and secondly to assess the impact that each route option and Travel Hub option is likely to have.

Planning assessment of LDA Report

- 5.56 LDA has divided the assessment area of the route into five sectors (sector I, II, III, IV and V) and each sector has sub-areas (sub-areas A, B and C). Each sector and sub-area within them have been assessed to determine the impact on the openness and purposes of the Green Belt and degree of conflict with the Green Belt.
- 5.57 The assessment concludes that the route options (proposed GCP route and the Robinson Way Alternative route) including Travel Hubs would preserve the openness of the Green Belt. However, the proposed associated infrastructure such as the bus stops and bridges would reduce the openness of the Green Belt.

LDA Sector I

- 5.58 Sector I, contains two route options (the GCP route and Robinson Way Alternative route) which link at Hinton Way north of Great Shelford. This sector is split into three sub-areas (I.A, I.B and I.C). This sector extends from the railway line to the west to the A1307 to the east and up to Hinton Way to the south-east. The route options pass directly through sub-areas I.B which forms two areas split by sub-area I.C, and sub-area I.A which is located adjacent along the south-west boundary of the A1307. I.A is located adjacent to the Gog Magog SSSI and Thatched Cottage which is a Grade II Listed Building close to the roundabout. Sub-area I.C is sandwiched between sub-area I.B and contains the Nine Wells Local Nature Reserve (LNR).

- 5.59 The stretches of the routes that are located within the Cambridge Biomedical Campus (CBC) site are located outside the Green Belt. This includes a bus stop location west of Addenbrookes hospital. As these elements are located outside the Green Belt they have no impact on the Green Belt.
- 5.60 In terms of openness, the GCP route would cross undeveloped countryside from the point it exits the CBC and would require minimal cut and fill operation. Aside from the bridge over Hobson's Brook, there would be no significant volume of development and as such this part of the route would preserve the openness of the Green Belt, according to the LDA.
- 5.61 With regards to the bridge, no detailed design work has been carried out. However, LDA is of the view that this would nevertheless introduce a volume of new development within sub-area 1.B. Whilst the volume of development is likely to be relatively small, LDA is of the view that there would be reduction in the openness of the Green Belt subject to the designed detail of the bridge which may reduce the impact.
- 5.62 In terms of the purposes of the Green Belt, LDA is of the view that overall the GCP route would not conflict with any of the purposes of the Green Belt in this Sector.
- 5.63 With regards to the degree of harm on the openness and conflict with the Green Belt purposes, LDA is of the view that the bridge over Hobson's Brook, required for the GCP option would have a minor degree of harm to the Green Belt in terms of reduction in openness. However the design of the bridge and planting may reduce the degree of harm.
- 5.64 With regards to the purposes of the Green Belt, the Robinson Way Alternative route require the removal of vegetation and travel up a sloped landform which would increase visibility of the route from Cambridge and the foothills of Gog Magog Hills. This would affect the setting of Cambridge. As a result, LDA conclude the route would have some conflict with the Cambridge Green Belt purpose 2 and National Green Belt purpose 4.
- 5.65 According to LDA, the Robinson Way Alternative route result in a moderate degree of harm to the Green Belt purposes which arise from the conflict with Cambridge Green Belt purpose 2 and National Green Belt purpose 4. This is as a result of introducing a permanent new built development where development is limited and change the character of the setting to Cambridge. The Robinson Way Alternative route would not conflict with the openness of the Green Belt. Whereas the GCP route would not conflict with Green Belt purposes, but would have a minor degree of harm to Green Belt openness.
- 5.66 In Green Belt terms, as set out within the LDA Report, the degree of conflict the purposes of including land within the Green Belt will change dependent upon the final transport option chosen. Therefore, at this stage, and subject to further details, out of the two route options, the GCP route is considered to be slightly preferable in Green Belt terms to the Robinson Way Alternative route. This is a material planning consideration in favour of the GCP route option.

LDA Sector II

- 5.67 Sector II covers the areas north of Great Shelford and Stapleford extend up to the A1307 to the north. This sector is split into three sub-areas II.A, II.B and II.C. Sub-area II.A is north of Great Shelford and contains both route options, which merge from different approaches at Hinton Way. Sub-area II.B contains the merged route and covers the area between Hinton Way and Haverhill Road. Sub-area II.C covers the area north-east of Great Shelford and Stapleford. The routes extend from Haverhill Road south-east towards the dismantled railway line.
- 5.68 In sub-area II.A, the GCP route would utilise an existing gap in the hedgerow between Great Shelford and Clarke's Hill thus minimising removal of vegetation. The Robinson Way Alternative option is located in an area that is less developed and will require removal of vegetation along the hedgerow between Great Shelford and Clarke's Hill. It is the view of LDA, both routes would preserve the openness of the Green Belt in sub-area II.A. LDA also advise the route through sub areas II.B and C would also preserve the openness of the Green Belt.
- 5.69 However, LDA advise that the proposed stops and associated infrastructure (bus shelters, signage, hard surfacing, lighting and road markings) at Hinton Way and Haverhill Road would introduce a volume of development which would reduce the openness of the Green Belt within sub-areas II.B and II.C.
- 5.70 In addition, a bridge will be required in sub-area II.C to cross the River Granta. The bridge will require the removal of some vegetation along the river to introduce the built structure with a span of 166m and a deck height of approximately 6 metres with ramped approaches. LDA is of the view that although the volume of development would be substantial within sub-area II.C it would have limited visibility from the surrounding area due to vegetation.
- 5.71 In terms of the Green Belt purposes, LDA is of the view that, both route options and stops in Sector II would result in some conflict with Cambridge Green Belt purpose 2 and National Green Belt purpose 4. Also, subject to detailed design, the crossing over River Granta in sub-area II.C, which is assumed to be a bridge and approach ramps, would have no impact on the setting of the villages and would not conflict with Green Belt purposes.
- 5.72 In terms of degree of harm to the Green Belt purposes, LDA is of the view that the Robinson Way Alternative option would result in a Moderate degree of harm due to the conflict with Cambridge Green Belt purposes 2 and National Green Belt purposes 4. However, there would be some potential to reduce the degree of harm through landscape planting along the western side of the route.
- 5.73 According to LDA, the GCP route option would result in minor alteration to the setting of the Great Shelford resulting in a minor degree of harm to the Green Belt due to the conflict with Cambridge Green Belt purpose 2 and National Green Belt purpose 4. The degree of harm has the potential to be reduced through appropriate landscaping along the western side of the route. The degree of harm would also apply to sub-areas II.B and II.C.

- 5.74 The introduction of stops along the route would result in a minor degree of harm to the Green Belt due to the reduction in openness and conflict with Cambridge Green Belt purpose 2 and National Green Belt purpose 4. LDA is also of view that planting could mitigate the impact but if lighting is installed a minor degree of harm on openness would remain.
- 5.75 The proposed crossing/bridge and approach ramps over the River Granta would introduce a volume of development in the countryside which would impact the openness and result in a Moderate-minor impact to the Green Belt. The potential harm could be reduced by the design of the structure.

Sector III

- 5.76 Sector III covers the area to the north and east of Sawston which extends either side of the dismantled railway. The sector contains three sub-areas; III.A covers the area south of the dismantled railway line and north-west of Sawston; III.B covers the housing development area under construction; and III.C covers the area north of the dismantled railway line up to River Granta and to the north and east of Sawston.
- 5.77 The GCP route passes through sub-area III.C along the northern side of the dismantled railway line over Sawston Road north of the new housing development before spurring into five additional route options to access the three Travel Hub site options. III.C includes stop on Sawston Road adjacent to a housing allocation (H/1b) which is currently under construction by Hill. No part of the route would fall within sub-areas III.A or III.B. Therefore, the focus is on sub-area III.C.
- 5.78 In terms of preserving the openness, LDA is of the view that whilst the route would extend across underdeveloped countryside and at grade it would preserve the openness of the Green Belt in this sub-area. LDA find that this would also apply to the five routes which extend into sub-area of IV.B of Sector IV. The visibility of the proposed bridge and proposed stop, which is also likely to require bus shelters and covered cycle store would reduce over time with planting but it would remain visible in the short to medium term. This would result in a reduction in openness of the Green Belt within sub-area III.C. The introduction of associated signage, lighting and road markings near the proposed road junction are not considered to affect openness.
- 5.79 The bridge over the river Granta also spans into this sector and the LDA recommendations are consistent with their recommendations for section II.
- 5.80 In terms of Green Belt purposes, LDA is of the view that the route option (including the five routes) within this sub-area would not affect the character of the village and would not affect the separation between Sawston, Stapleford and Babraham. As a result, there would be no conflict with the Green Belt purposes within this sector. The proposed stop in sub-area III.C adjacent of a recent development area on the eastern side of Sawston would not affect the character of the village or its wider setting. As a result, LDA do not consider the stop would conflict with the Green Belt purposes.

- 5.81 In terms of the crossing over River Granta, LDA is of the view there would be no conflict with Green Belt purposes within this sector.
- 5.82 In terms of the degree of harm, the proposed stop is judged to have a Minor degree of harm to the openness of the Green Belt. The proposed river crossing is also considered to have a Moderate-minor degree of harm on the openness of the Green Belt but it may be possible to reduce the harm as part of the detailed design.

Sector IV

- 5.83 Sector IV covers the area south of Babraham between the A1307, A505 and A11. The sector contains the five route options which serve the Travel Hub options, a stop, and the locations of Travel Hub sites A and B. Sector IV is split into three sub-areas IV.A over the area south of the dismantled railway line, IV.B covering north of the railway and south of Babraham, and includes Travel Hub site A) and IV.C which covers the area south of A1307 and west of A11 and includes Travel Hub site B). There is limited built development within sector IV which consists predominantly of open farmland with the Home Farm complex located within sub area IV.C on the southern edge of Babraham.
- 5.84 At this stage, no detailed designed have been undertaken for the three Travel Hub site options and of the five route options the purple route would serve Travel Hub A, the pink and brown routes would serve Travel Hub B, and the black and blue routes would serve Travel Hub C which is located east of the A11 and outside the Green Belt. All three hubs would include improved shared access routes and upgrading of existing routes.
- 5.85 In terms of preserving the openness, LDA is of the view that both Travel Hub option (A and B) would result in a reduction in the openness of the Green Belt within both sub-areas (IV.B and IV.C).
- 5.86 In terms of the five routes (Purple, Pink, Brown, Black and Blue), the Purple, Pink and Brown routes would on balance preserve the openness of the Green Belt. The Black and Blue routes would include a stop and require a multi-user bridge over the A11 resulting in a physical volume of development which would be visible from the north and west and cause a reduction the openness of the Green Belt in sub-area IV.C.
- 5.87 Travel Hub Site A (as with the other site options) would introduce hard surfacing area for car parking which would also require a small ticket office building and/or bus shelter resulting in development in the Green Belt. This will also require lighting thus increasing its visibility during the day and night. A proposed roundabout on the A505 will be required to facilitate access to the site. The roundabout would require the removal of vegetation increasing the visibility of the site. Whilst the visibility could reduce over time by landscape planting, it will remain in the short to medium term as it establishes and longer in locations where planting is not possible. The introduction of increased signage, lighting and road markings near the proposed A505 roundabout is not considered to affect openness. Overall, there would be a reduction in openness of the Green Belt.
- 5.88 As with site A, site B would introduce hard surfacing and ancillary facilities including a ticket office and/or bus shelter which would add to the built development within the Green

Belt. The proposed access road into the Travel Hub would be relatively flat and there would be minimal requirement for cut and fill operations, meaning that there would be no significant volume of development to affect the openness of the Green Belt. The introduction of increased signage, lighting and road markings near the proposed A505 roundabout is not considered to affect openness.

- 5.89 The location of the site on lower ground and the existing woodland block would minimise its visibility from the north and west and could be further reduced by landscape planting. However, the Travel Hub and bridge would result in a reduction in openness of the Green Belt in sub-area IV.C.
- 5.90 In terms of conflict with Green Belt purposes, LDA is of the view that sites A and B would be located far enough west from the edge of Babraham and Sawston to avoid changes to the character of the setting of either village and consequently the setting of Cambridge, which equates to no conflict with Cambridge Green Belt purpose 2 or National Green Belt purpose 4 in this regard. The sites would also be far enough away from the existing settlement to prevent merging avoiding conflict with Cambridge Green Belt purpose 3 and National Green Belt purpose 2.
- 5.91 In terms of the degree of harm, sites A and B would result in a moderate degree of encroachment into undeveloped countryside, resulting in a Moderate degree of harm to the Green Belt due to the impact on openness and a conflict with National Green Belt purpose 3, Cambridge Green Belt purpose 2 and National Green Belt purpose 4. Planting around the perimeters of the Travel Hub could reduce this conflict over time to a Moderate-Minor degree of harm to Green Belt purposes.
- 5.92 The Pink and Brown routes would require a bridge over the River Granta to provide access to site C. They would introduce a volume of development into the countryside and reduce openness. This would result in a Moderate-minor harm to the Green Belt which may reduce subject to the detailed design of the bridge.
- 5.93 The Black and Blue routes would introduce a stop, bridge over River Granta and new bridge over the A11. The proposed stop would have a minor degree of harm to the openness of the Green Belt which would continue even after planting around the stop. In terms of the proposed bridge over the River Granta and associated infrastructure, this would introduce a volume of development into the open countryside. This would result in a Moderate-minor degree of harm in terms of reduction in the openness of the Green Belt. The impact may reduce subject to the detailed design of the bridge. The new bridge over the A11 would introduce additional built development into an area which is undeveloped. This would reduce openness and affect the rural setting of Babraham and wider rural landscape resulting in a Moderate-minor degree of harm to the Green Belt. It may be possible to reduce the potential harm as part of the detailed design of the bridge.
- 5.94 Therefore, whilst site C is outside of the Green Belt the Infrastructure associated with it will have a degree of conflict with Green Belt purposes.

Sector V

- 5.95 Sector V covers the small area along the A11 and includes the area of land between the A11 and Newmarket Road, the former alignment of the A11. It is split into two sub-areas (V.A and V.B) and contains the multi-user bridge element. The proposed Black route would require the construction of two separate bridges (one would replace the existing footbridge) and the Blue route would require the construction of a single combined bridge. For both route options, the creation of the ramp for the bridge over the A11 would require earthworks.
- 5.96 In terms of preserving the openness, the volume of development in sub-area V.B would be relatively small and would not be seen from the surrounding area due to the vegetated character of the area. LDA is of the view that there would be a reduction in the openness of the Green Belt by creating a ramp or ramps. As a result, there would be a reduction in openness in both sub-areas. The routes would require minimal cut and fill operational due to the flat landscape. Where they are no longer on the bridge, ramps, would be constructed at grade, minimising the visual effect of the proposals. This is considered to preserve the openness of the Green Belt in sub area V.B.
- 5.97 In terms of conflicting with the Green Belt purposes, LDA is of the view that both route options would avoid conflict with the Green Belt purposes in this sector. This is due the distance of both route options from settlements to avoid impacting the setting of the nearby villages and to prevent them merging.
- 5.98 LDA is therefore of the view that in terms of the degree of conflict on openness, both routes would result in a minor reduction to the openness which would have a Minor degree of conflict, given in the case of the Black route the existing road infrastructure in V.A and in the case of the Blue route, the existing bridge and road infrastructure in V.A.

Conclusions of LDA Report:

- 5.99 When comparing the route option promoted by the GCP and Robinson Way Alternative, LDA are of the view that the GCP option can be delivered without any harm to the purposes for including land within the Green Belt (aside from the bridges and the bus stops). The Robinson Way Alternative option would result in a moderate degree of conflict with Green Belt purposes 2 and 5. However, conversely the GCP option requires a bridge crossing over the River Granta, which subject to detailed design is likely to have a minor degree of harm on Green Belt in terms of reduced openness. Overall in Green Belt terms, the GCP route is considered to be preferable.
- 5.100 Of the five route options serving the Travel Hubs, the Purple, Pink, and Brown would preserve the openness of the Green Belt and least degree of conflict/harm with the Green Belt purposes. However, this needs to be weighed in context with the fact that Travel Hub C is located outside of the Green Belt and route options blue and black are required to access it. Therefore, whilst there will be a conflict with Green Belt purposes for these two route options, they facilitate a Travel Hub that is outside of the Green Belt, as oppose to the other two options, where the Travel Hubs are both within the Green Belt. Overall Travel Hub C, and the associated routes to it would have the least degree

of harm in Green Belt terms, when compared to the other two options and the total quantum of development within the Green Belt.

- 5.101 Of the five stops, four are located within the Green Belt. The four stops would reduce openness and affect the setting of the villages, resulting in a Minor degree of harm to Green Belt arising from the impact on openness, which would reduce over time with planting and the degree of harm would be minor.

Route and Travel Hubs options

- 5.102 The planning balance when selecting the most appropriate option will have to be weighed against the transport need to create a fast, frequent and reliable public transport system and to ensure that the scheme is fully deliverable in planning terms. Other issues for consideration in the planning balance include landscape and visual impact, ecological impact, and heritage impact.
- 5.103 In terms of the three Travel Hubs options, site B is the highest performing in terms of its accessibility and connectivity due to its location from the existing road network. Whilst site C is located outside the Green Belt, it has the highest level of objections based upon public consultation carried out to date. Site A would cost the least but it less accessible from the road network. It also has potential implications on the setting of Pampisford Hall which is a grade II listed building located to the south of site A. However, the site would be screened from view by the existing vegetation within the curtilage of the Hall, the A505 and intervening field.
- 5.104 In terms of Travel Hub Site B, the site is located south-east of Babraham village, which contains several Listed Buildings (mostly Grade II). The existing woodland to the rear of the property along High Street and the woodland east of the site A, would help to screen views of the site from the village.
- 5.105 Therefore, a detailed assessment of the heritage impact of the Travel Hub options will be carried out to determine the least impactful on the setting and appearance of the heritage assets. Further analysis is contained within the OBC prepared by Mott MacDonald. Detailed work will be undertaken to assess this impact once a preferred alignment for the Public Transport Link project has been selected.

Assessment of whether the proposals are not inappropriate development in the Green Belt

Public Transport Route

- 5.106 Therefore, in assessing whether the Public Transport Link proposals are 'not inappropriate' or 'inappropriate' development in the Green Belt it is important to consider the degree of harm and whether the proposed development includes elements that fall outside the scope of infrastructure that is reasonably necessary for the Cambridge to Haverhill Public Transport Link.

- 5.107 With a requirement for a Green Belt location being identified as the most appropriate for the Public Transport Link as 'local transport infrastructure', it is also important to consider whether the remaining criteria of paragraph 146 of the NPPF apply so that the Public Transport Link can be considered as 'not inappropriate' development within the Green Belt. Otherwise 'very special circumstances' will need to be demonstrated.
- 5.108 The degree of harm to the Green Belt of each component in Phase 2 has been carefully assessed in the LDA report. The report concludes that the degree of harm on the Green Belt from the proposed Public Transport Link would be between Moderate to Moderate-minor to Minor with appropriate planting and when assessed in the context of the surrounding environment. Therefore, with careful and robust landscaping and retention of as much of the existing vegetation as possible, the harm to the Green Belt would be minimised.
- 5.109 The Public Transport Link being promoted by the GCP will not result in significant development above the ground level, other than the four stops, bridge over the A11 and a degree of cut and fill development. In this regard, having regard to the relevant case law (*Tadcaster* case), it is considered that provided suitable mitigation is provided, the visual impact of the development would not be so significant for the development to be considered as inappropriate within the Green Belt. It is therefore considered that the proposals could be considered as not inappropriate development within the Green Belt and that 'very special circumstances' would not need to be demonstrated. A full assessment on this will be undertaken at detailed design stage. However, even if very special circumstances were required, then this can be demonstrated.

Travel Hubs

- 5.110 In respect of the Travel Hubs, the Supreme Court ruling on the Samuel Smith case (refer to paragraphs 4.25-4.31) is considered to be particularly relevant. Accounting for this ruling the guidance on Park & Rides within PPG2 is considered to be of relevance.
- 5.111 An analysis of the proposals against paragraph 3.17 of PPG2 is set out as follows:

Park and ride development is not inappropriate in Green Belts, provided that:

- (a) a thorough and comprehensive assessment of potential sites has been carried out, including both non-Green Belt and, if appropriate, other Green Belt locations, having regard to sustainable development objectives, and the need to be flexible about size and layout;

Response:

A detailed assessment is in the process of being undertaken of the three proposed Travel Hub sites as outlined in this report. As outlined above, two of the three are within the Green Belt. Although the third site (option C) is located outside of the Green Belt, it would involve a new bridge, which is within the Green Belt in order to operate. If site A or B is selected it will need to demonstrate clear sustainable development objectives over site C, which is outside of the Green Belt (refer to paragraphs 5.99-5.101 above).

Provided clear transport benefits of site A or B over Site C can be demonstrated, this would justify their selection over site C

- (b) the assessment establishes that the proposed green belt site is the most sustainable option taking account of all relevant factors including travel impacts;

Response:

As part of the Outline Business Case being prepared by Mott MacDonald, a detailed assessment of the three sites is being undertaken, to assess travel impact of the three sites.

- (c) the scheme will not seriously compromise the purposes of including land in Green Belts, as set out in paragraph 1.5;

Response:

LDA's Green Belt review has established the degree of conflict with the Green Belt purposes, which for Travel Hub Sites A and B would be a Moderate- Minor over time and have a degree of conflict with 2 of the 5 purposes of including land within the Green Belt. The bridges associated with Travel Hub Site C would also have a moderate- minor degree of harm. Accounting for the fact and degree test, (and subject to detailed design) this degree of conflict is not considered to be significant enough to 'seriously compromise' the purposes of including land within the Green Belt.

- (d) the proposal is contained within the local transport plan (or in Greater London the Local Implementation Plan) and based on a thorough assessment of travel impacts; and

Response:

The proposed Cambridge to Haverhill transport project is contained in the Cambridgeshire Transport Delivery Plan 2019/20 to 2021/22 which forms part of the Local Transport Plan. It is one of the transport projects that will be brought forward by the Greater Cambridge Partnership. The travel impacts of each options have been considered in terms of accessibility, which is a significant factor for consideration. The next stage of the process will be to assess the traffic modelling of each site.

- (e) new or re-used buildings are included within the development proposal only for essential facilities associated with the operation of the park and ride scheme

Response:

Any new buildings or structures that serve the Travel Hubs will be limited to that which are essential to enable the safe functioning of the Travel Hubs of its users. Detailed design of the Travel Hubs and associated ancillary provisions will be carried out once a preferred option has been chosen.

- 5.112 Therefore, subject to adequately addressing points a) and b) it is considered that a good argument could be made that the proposed Travel Hub is not inappropriate development within the Green Belt.

Very Special Circumstances

- 5.113 Paragraph 144 of the NPPF states when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.114 When considering if 'very special circumstances' exist, it is important to consider if the harm to the Green Belt is out-weighed by the other material considerations. The level of harm to the Green Belt will depend on the final route alignment chosen for the Public Transport Link project. However, the LDA report has assessed the degree of harm/conflict with the Green Belt based upon the information available.
- 5.115 It is considered that strong 'very special circumstances' exist for the delivery of the Public Transport Link scheme. The Very Special Circumstances relate to the strong transport need for the scheme, as set out in detail within the Outline Business Case. In addition, by improving the public transport connections into Cambridge, this reduces pressure for the release of Green Belt land to meet the housing needs of the area. The infrastructure provided by this scheme will assist with facilitating housing growth outside of the Green Belt and be beneficial in protecting the Green Belt in this regard. In addition, there are substantial economic benefits, related to shorter journey to work times and the knock on investment in the area. The benefits of a Public Transport Link can only be realised by a Green Belt location and this in itself is considered to provide 'very special circumstances'. The Public Transport Link project will also facilitate accessibility for pedestrian and cyclist to the Green Belt, which is supported under paragraph 141 of the NPPF.

Land outside the Green Belt

- 5.116 In relation to the parts of the Public Transport Link scheme that is situated outside of the Green Belt, policies of countryside protection apply. This relates mainly to the parts of the County and Robinson Way Alternative where they extend off Francis Crick Avenue and Dame Mary Archer Way, and Travel Hub Site C north of A505, which are located outside the Green Belt.
- 5.117 The main South Cambridgeshire Local Plan policies are policy S/7 (Development Framework) which states outside of development frameworks, development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside will be permitted. Policy NH/2 (Protecting and Enhancing Landscape Character) states new development should conserve and enhance the local landscape character, and policy NH/8 (Mitigating the impact of Development in and Around the Green Belt) which states development on the edge of settlements surrounded by Green Belt must include careful landscaping and design measures of a high quality.

- 5.118 As set out above, the purpose of the Public Transport Link is to provide a direct, fast and reliable route from Cambridge to Haverhill. To achieve this, there is a requirement to use land that is outside of the Development Framework boundary. Therefore, the principle of the Public Transport Link in the countryside is fully consistent within the above policies of the adopted South Cambridgeshire Local Plan (2018) in that there is clear need to use land within the countryside.
- 5.119 Overall, the proposals are considered to be consistent with the three dimensions of sustainable development, including relevant Green Belt policy. It is therefore considered that the principle of the Public Transport Link development is supported in planning terms. This will need to be reviewed further as a single route and Travel Hub option are chosen.

Economic

- 5.120 In economic terms the Public Transport Link will provide much needed infrastructure to link together existing major housing and employment areas. It will provide the opportunity for a more sustainable, reliable and high speed alternative form of travel between Cambridge and Haverhill for existing residents. This will include providing reliable journeys to work and access to leisure and travel beyond. In addition, the scheme also aligns with the projected housing particularly in the settlements of Linton, Sawston and Haverhill and job growth at the Biomedical Campus, and the existing sites of Babraham Research Campus and Granta Park which are located along this corridor. The A1307 already serves a major arterial route into Cambridge and the Public Transport Link scheme would help to facilitate expansion along the route and provide a fast reliable public transport link to access employment.
- 5.121 The emerging Greater Cambridge Local Plan Issues and Options Consultation document states that the Councils are committed to doubling the economic out of Cambridgeshire and Peterborough over the next 25 years. Whilst this document only has very limited weight in planning terms, it does set out the direction of policy for the Greater Cambridge Shared Planning Service. Therefore, established employment hotspots such as the Biomedical Campus, Babraham Research Campus and Granta Park will need to grow to meet the Councils' objective. Therefore, the Public Transport Link scheme will play a significant role in bringing forward the growth and investment into the area. The scheme would also facilitate growth outside the Green Belt which would help to increase the opportunity to access to employment and leisure via public transport.
- 5.122 It is therefore considered that the Public Transport Link is consistent with the economic objectives in terms of housing and employment growth within both the adopted and emerging Development Plans for both Councils. The Public Transport Link scheme will also create a number of jobs both directly and in-directly, which is strongly supported in planning terms and is a strong material consideration in favour of the proposals.

Social

- 5.123 In social terms the Public Transport Link scheme will seek to promote healthy communities by providing a significantly improved cycle and pedestrian network from Cambridge to Haverhill. This will result in a likely modal shift change and more people cycling and walking to work. In addition, by alleviating congestion, the Public Transport Link will also support the required housing and employment growth along the A1307 corridor. This is required in order to meet the objectively assessed housing and employment needs of Greater Cambridge, as identified in evidence based documents in their adopted Local Plans, the recommendation of the CPIER report, and deliver the strategies in the LTP.
- 5.124 The Public Transport Link scheme will provide a fast and reliable access to the destination along the route which will encourage the reduction of car travel, particularly for commuters into Cambridge and reduce traffic congestion. The Public Transport Link would also provide a high quality walking and cycling facilities alongside the Public Transport Link that will encourage exercise and access to the Green Belt to promote healthy living and well-being.
- 5.125 The social benefits of the scheme are also considered to be strongly supported in planning terms and represent a strong material planning consideration in favour of the Public Transport Link scheme.

Environmental

- 5.126 The environmental impact of the Public Transport Link is a key issue in planning terms. These in particular relate to restriction of inappropriate development within the Green Belt, the impact of the proposals in landscape and visual terms, and heritage considerations related to the setting of Cambridge City, Great Shelford, Sawston and other heritage assets. The support for sustainable transport schemes as set out in the NPPF, needs to be weighed against other policy factors within the NPPF and the environmental impact of the scheme.
- 5.127 The environmental impact is a broad term and one of the benefits of the scheme is that the Public Transport Link will provide clear benefits in terms of reducing CO2 and emissions associated with the use of the private motorcar. The full environmental impact of the Public Transport Link project will be assessed as part of the Environmental Impact Assessment process.
- 5.128 The anticipated benefits of the proposed Public Transport Link scheme based upon the strategic objectives would be likely to significantly outweigh any harm from the development. The proposed Public Transport Link scheme would constitute sustainable development that would facilitate economic growth through access to jobs, retail and leisure facilities, social connectivity and well-being, access housing, and environmental enhancement and protection through reducing traffic congestion, air pollution and biodiversity enhancements.

5.129 In principle of development terms, the proposals are therefore considered to be consistent with the National Planning Policy Framework, South Cambridgeshire District Council and Cambridge City Council Adopted Local Plans (2018).

6 PLANNING CONSIDERATION

Introduction

- 6.1 This section of the report provides a brief overview of other detailed planning considerations and detailed reports that will be commissioning as part of the Public Transport Link project.
- 6.2 Aside from the principle of development, it will be important to consider other material planning considerations as set out within the adopted Development Plans, which would render the scheme unacceptable in planning terms. It is recognised that there are a number of other detailed planning policy considerations, which will also need to be taken into consideration when addressing if the Public Transport Link scheme is acceptable in planning policy terms. Initial work to assess this is being undertaken by Mott MacDonald.
- 6.3 Important detailed matters to address as part of the Public Transport Link proposals include, but are not limited to the following:
1. Heritage, Listed Buildings and Archaeological Considerations;
 2. Transport;
 3. Landscape and Visual Considerations;
 4. Impact upon Neighbouring Residential Amenity;
 5. Ecological and Biodiversity considerations and impact upon sites of international, national, regional and local importance;
 6. Noise & Vibration;
 7. Air Quality;
 8. Drainage and Flood Risk;
 9. Ground Conditions; and
 10. Waste.

Environmental Impact Assessment Process

- 6.4 The above matters will be considered in detail as part of the Environmental Impact Assessment (EIA) process, which is a formal planning process that major developments have to follow. The purpose of an EIA is to assess the environmental impact of new developments and assesses both positive and negative environmental impacts of new developments.

6.5 Environmental Impact Assessment (EIA) is the process of evaluating the likely environmental impacts of a proposed project or development, taking into account inter-related socio-economic, cultural and human-health impacts, both beneficial and adverse. The Public Transport Link scheme would fall under the category of Schedule 2 development as set out in the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) and may be likely to have significant effects on the environment by virtue of factors such as its nature, size or location. As a result, a full EIA will be undertaken to assess the impact of the scheme across a range of different disciplines. This will include the preparation of an Environmental Statement to fully assess the scheme.

Formal Request for a Scoping Opinion

6.6 In order to determine the matters and chapters that will be considered as part of the EIA process, it is likely that a formal request for a Scoping Opinion will be submitted to clarify the matters to be included within the Environmental Statement.

6.7 Therefore, at this stage, the full scope of the EIA is therefore yet to be confirmed. The matters that are likely to be included as part of the EIA are set out below.

Site Selection and Consideration of Alternatives

6.8 A legal requirement of the EIA process is to provide a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the applicant, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of environmental effects. In this instance, it is likely to include an overview of different route options for the Public Transport Link and it will also consider the 'Do Nothing Scenario.'

Policy Context

6.9 This section will outline the relevant planning policy considerations at both a National and Local level in relation to the Public Transport Link scheme. An assessment of the Green Belt policies and NPPF has been provided but this will need to be updated/expanded once the Public Transport Link options have been finalised and an assessment of the final route and Travel Hub will need to be carried out.

Economic and Social Assessment

6.10 This section will set out the economic and social impact of the proposals. It will assess the economic impact of the proposals in relation to job growth and supporting the housing and employment objectives of the two Local Plans and the adopted Transport Strategy. It will assess the likely impact of the proposals on human health in terms of promoting cycling and walking.

Transport

- 6.11 Detailed work relating to transport matters will need to be carried out to assist in informing the case for the proposed Public Transport Link. Further work will be undertaken as part of the EIA process to determine the full impact of the scheme in transport terms having regard to journeys by car, bus, cycling and pedestrians and the impact that the development will have on the surrounding road network.

Heritage & Archaeology

- 6.12 This chapter will assess heritage matters and considerations related to the impact of the Public Transport Link on designated conservation areas, Listed Buildings and the setting of Cambridge City. Whilst heritage overlaps with the Green Belt considerations, it is also an important consideration in its own right. Heritage considerations will include the impact that the Public Transport Link proposals will have upon the setting of identified listed buildings and conservation areas along the route. The setting of Cambridge City and the Conservation Areas of surrounding settlements such as Babraham and Sawston will be key matters to address as part of the proposals. Policy NH/14 (Heritage Assets) of the adopted South Cambridgeshire Development Local Plan states proposals will be supported when they sustain and enhance the significance of heritage assets including their setting and in accordance with the NPPF.
- 6.13 Of note are Pampisford Hall which is a Grade II Listed Building (The gates and gate-piers for Pampisford Hall are also Grade II Listed), Nine Wells Monument which is Grade II Listed, Church Farmhouse in Babraham which is Grade II Listed, Temple Café and Restaurant which is a Grade II Listed. A full scope of the heritage assets will be provided for agreement with the Conservation Officers at the Greater Cambridge Shared Planning Service and, in terms of archaeology the County Council's Historic Team.

Landscape & Visual

- 6.14 Some indicative landscape proposal work relating to landscape and visual considerations for the Travel Hub sites and associated route options have already been undertaken by GCP which looks at board areas of potential landscaping to mitigate impact.
- 6.15 Further landscape work will need to be carried out to determine the full impact of the scheme in landscape terms. A full Landscape and Visual Impact Assessment will be undertaken as part of the EIA process, with suggested mitigation as required. Views for the assessment will need to be agreed with the Council but it is likely that Gog Magog Hills will be an important viewpoint.

Ecology and Biodiversity

- 6.16 As part of the process detailed, ecological surveys will be undertaken to assess the impact of the Public Transport Link scheme in ecological terms. Ecological designations in proximity to the Public Transport Link, include Gog Magog SSSI, Demford SSSI, Sawston Hall Meadows SSSI and Nine Wells Local Nature Reserve. These areas are protected under policies NH/4 (Biodiversity) and NH/5 (Sites of Biodiversity or Geological

Importance) of the adopted South Cambridgeshire Local Plan. The level of adverse impact upon ecology will be dependent both on the selected route and also upon mitigation provided. At this stage, no detailed ecological or biodiversity assessment has been undertaken.

- 6.17 The GCP is committed to delivering 10% biodiversity net gain with a target of at least 20% and also preserving the Old Railway County Wildlife Site.

Air Quality

- 6.18 This section will assess the impact that the scheme will have in terms of air quality both for neighbouring receptors in close proximity to the Public Transport Link scheme and wider considerations relating to the likely reduction in emissions in the wider road network if the Public Transport Link scheme is delivered.

- 6.19 The site however is not within an Air Quality Management Area and so there is no specific requirement to manage air quality. However, Public Transport Link forms part of the Combined Authority's CAM project, which proposes electric, rubber-tyred tram-like vehicles using dedicated, off-road routes to bypass congestion. In the meantime, it is likely that the Public Transport Link will use manned electrified buses which currently operate in Cambridge.

Sound, Noise and Vibration

- 6.20 A noise and vibration impact assessment will need to be carried out to inform the degree of harm from sound created by potential traffic movements along all the route options and Travel Hub sites against back ground levels. Mitigation measures may also be required to reduce the impact on the residential amenity of local residents in the neighbouring villages. This will be particularly necessary where the route passes close to existing dwellings.

Water, Flood Risk and Drainage

- 6.21 A full assessment of the drainage strategy for the Public Transport Link and consideration of any flood risk will be fully considered as part of the EIA. Most of the route options are located within Flood Zone 1 which is low risk of flooding. However, there are parts of the site where they cross the River Granta which are located within Flood Zone 2/3. Therefore, a Flood Risk Assessment will be necessary to demonstrate how the proposal will overcome the effects of flooding and mitigate the impact of dispersing flooding/flood water to adjacent areas.

Ground Conditions

- 6.22 This section will provide an overview of the ground conditions along the route and whether any contaminated land matters need to be addressed as part of the Public Transport Link scheme. Most of the land for the proposed Public Transport Link scheme appears to be within arable fields. There are no previously developed sites except for the proposed stops which are located on existing roads.

Waste

6.23 This section of the report will relate to the construction of the Public Transport Link and any construction waste that will be created and re-used as part of the scheme.

Clarification of Matters not to be included within the EIA

6.24 There will be some matters that are likely to form part of the planning application, but will not form part of the EIA. These include the following:

- Plans and Drawings for the Scheme;
- Planning Statement;
- Statement of Community Involvement;
- Construction Management Plan;
- Planning Application Forms; and
- Ownership Certificates.

6.25 The full scope of matters including within and outside of the EIA will be formally agreed with the relevant local planning authorities.

**APPENDIX 1: CONSIDERATION OF GREEN BELT ISSUES
REPORT BY LDA**

**APPENDIX 2: HIGH COURT JUDGMENT FOR SAMUEL SMITH
OLD BREWERY (TADCASTER) AND OXTON FARM AGAINST
NORTH YORKSHIRE COUNTY COUNCIL AND DARRINGTON
QUARRIES LTD (2018)**

**APPENDIX 3: SUPREME COURT JUDGEMENT ON HIGH COURT
JUDGMENT FOR SAMUEL SMITH OLD BREWERY (TADCASTER)
AND OXTON FARM AGAINST NORTH YORKSHIRE COUNTY
COUNCIL AND DARRINGTON QUARRIES LTD**

**APPENDIX 4: LIST OF RELEVANT POLICIES FROM SOUTH
CAMBRIDGESHIRE LOCAL PLAN 2018 & CAMBRIDGE CITY LOCAL
PLAN 2018**