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South Cambridgeshire District Council
By email

S/3591/17/FL - Residential Development, Thriplow Farm, Lodge Rd, Thriplow
S/3567/17/FL - Car Repair Workshop, Brook Rd, Thriplow
S/3566/17/FL - Grain Store on Fowlmere Road, Foxton

I write to you to detail my concern regarding the harmful impact on the Green Belt which would result from the grant of permission for any and all of the above planning applications.

Consideration of all material impacts of the Residential Development

The Residential Development would result in the loss of the existing grain store facility from the site. It is a matter of fact, confirmed by the PDAS submitted in support of the Grain Store application (S/3566/17/FL), that the existing agricultural operation of Thriplow Farms requires a grain store of at least the size of the existing store to operate effectively. The provision of replacement grain store facility is therefore an inevitable requirement of the Residential Development. It is explicitly acknowledged by the applicant in the PDAS for the Grain Store application that the development of all three sites is linked.

The applicant identified three potential sites for the Grain Store, all of which are in the Green Belt. It ruled out two other sites, settling on the Fowlmere Road site. On the basis of the applicant’s submission, it is therefore inevitable that the Residential Development would necessitate development within the Green Belt. It is incumbent upon the Local Planning Authority to consider all material impacts of the Residential Development. Regardless of whether one application were made for the entire development or, as in this case, multiple separate applications were made, it would be irrational for the material impacts of the re-provision of a necessary grain store facility (detailed below) to not be weighed in the balance of the impacts of the Residential Development. The Council correctly considered precisely those impacts as part of its determination of a previous application for residential development of the site (S/0713/05/O). There is no justification for taking an alternative approach in this case.

The Residential Development would also result in the loss of the existing car repair business from the site. Adopted LDF policies ET/6 and SF/1 are material considerations in this matter. Draft Local Plan Policies E/14 and SC/3 are also relevant. Policies ET/6 and E/14 state that the loss of rural employment uses (“within villages” and “within or on the edge of villages” respectively) will generally be resisted unless one of three criteria apply. The applications contain no compelling evidence demonstrating that any of the criteria have been met and the loss of an employment use should therefore be considered unacceptable in principle. Policies SF/1 and SC/3 seek to protect village services and facilities. Given the level of support received in response to consultation for the continuation of the car repair business within the village, it must be concluded that the car repair business clearly qualifies as a village service and facility and its loss would result in significant harm. As such the retention of the employment use and the provision of the car repair business in the village is a necessary requirement of local policy. The application provides no evidence or argument to the contrary.

As with the re-provision of the grain store facility, the re-provision of the car repair business is necessary in order to free up the site for redevelopment. The material impacts of such re-
provision must therefore also be weighed in the balance of the impacts of the Residential Development.

**Green Belt impacts of the Grain Store facility**

The Grain Store is not inappropriate development by definition in the Green Belt under NPPF paragraph 89. However, paragraph 88 requires that substantial weight be given to any harm to the Green Belt. Very special circumstances to approve must outweigh harm through inappropriateness and any other harm.

The Grain Store facility would consist of three large buildings and associated development. The largest of the buildings would be over 100 metres long and generally 13 metres high increasing to 18 metres at one end. The site is currently completely open agricultural land and is extremely prominent in public views from Fowlmere Road, public footpath 94/3 to the West and permissive bridleway 05/127/0002 AG00222912A directly to the North. It would also be visible in distance views from Cambridge Road to the East and elsewhere on the permissive bridleway. Given the scale and location of the building, it would unquestionably cause serious harm to the openness of the Green Belt and its character and would interrupt and enclose both short and distance views across the countryside and Green Belt.

Screening of the site via boundary planting would not mitigate the significant loss of openness of the Green Belt. In terms of mitigating impact on the character of the Green Belt, landscaping would also be completely ineffective in the short and medium term and largely ineffective in the long term, particularly if slow growing native species were used rather than incongruous fast growing conifer or similar species. A Planning Inspector (APP/W0530/17/3179152) has recently judged on another site within the district that “even if substantial landscaping was planted, it would take time to mature and consequently there would be extensive short term harm to the visual amenity of the area”. This is equally true in this case, although the harm would be worsened by the scale of the development and its Green Belt location. Furthermore, the inspector judged that “the need to hide the development behind extensive landscaping is an indication that it is inherently inappropriate in this context”. Those judgements apply equally to the Grain Store development.

**Green Belt impacts of the Car Repair Workshop**

The proposed Car Repair Workshop is inappropriate development in the Green Belt under paragraph 89 of the NPPF. It would also cause other harm to the openness and character of the Green Belt over and above that of the existing agricultural barn due to the scale of the building and the fact that a significant additional level of external car parking would be required, as evidenced by the proposed plans, which would result in an urbanising impact on the character of the Green Belt.

**Balance of the impacts of the Residential Development**

In weighing the balance of the impacts of the development, the applicant’s PDAS fails to acknowledge or consider the consequent impacts of the development of the other two sites required in order to comply with policy (Car Repair Workshop) and allow the continued operation of the agricultural business (Grain Store). It correctly states at 9.19 that ‘footnote 9’ of paragraph 14 of the NPPF requires the impact on the Green Belt to be weighed in the balancing exercise. However, its assessment of the Green Belt impact of the scheme then fails to address the harm which would result from the necessary development of the other sites to free up the site for the residential development. As detailed above, the Local Planning Authority must consider all material impacts of a proposal when coming to a decision. It is clear that the harm to the Green Belt that would occur as a result of the overall development would be significant. It would clearly have a greater harmful impact on the Green Belt than either the current arrangement or a suitable redevelopment of the Lodge Road site for a new, larger grain store and car repair workshop.
It is therefore necessary for the application to demonstrate very special circumstances or benefits which would outweigh the significant Green Belt harm caused by the overall development which would be required in order to deliver the residential development.

The applicant’s PDAS suggest that there are significant social, environmental and economic benefits of the Residential Development.

The ‘economic benefits’ are limited to short term job creation during construction and additional contributions from residents to the local economy. Such benefits have generally not been judged adequate by the Local Planning Authority to outweigh harm from other 5 year supply applications in non-Green Belt locations. They are certainly not sufficient to outweigh the considerable harm to the Green Belt from the proposed scheme. This is also a natural conclusion of the national guidance referred to in the following paragraph.

The ‘social benefits’ are all related either to the provision of the housing or to the provision of infrastructure which would only be required in association with the housing. NPPG states that “unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. Considering the identified harm to the Green Belt that would result from the Car Repair Workshop and the Grain Store, the social benefits cannot, in the light of the NPPG, be considered to clearly outweigh the harm to the Green Belt. Rather, it is clear that the limited benefit provided by the housing scheme would not come close to outweighing the significant harm to the Green Belt.

Seven ‘environmental benefits’ are listed. The ‘benefits’ to Green Belt openness and visual amenity from redevelopment of the site would clearly be outweighed by the harm to the Green Belt openness and visual amenity caused by the Car Repair Workshop and Grain Store development and cannot therefore be considered benefits. The landscaping and ecological enhancement could be implemented now or as part of any redevelopment of the Lodge Road site for a new grain store facility and are not sufficient to outweigh the identified Green Belt harm in any case. (It is noted that the Council’s Ecology Officer has raised concern regarding the ecological impacts of the scheme). Decontamination is a requirement of residential development and does not stand as a significant benefit were residential development not forthcoming. Furthermore the submitted Geo-Environmental Report identifies only asbestos in made ground as an item requiring remediation suggesting any benefit of decontamination is minimal. Renewable Energy generation could be incorporated into the existing uses on site or a redevelopment of the site for a new grain store and car repair workshop and does not stand as a significant benefit of the scheme as opposed to the existing development.

The sole remaining suggested environmental benefit is the removal of the existing agricultural and car repair uses from the site which the PDAS states create dust and noise pollution to existing residents. It is noteworthy that both the existing grain store (S/1911/83F) and the car repair business (S/1391/98/F) were considered acceptable and granted planning permission by the Local Planning Authority notwithstanding the location of the site and its relationship with neighbouring residential uses. The latter permission is subject to a condition restricting the use of power operated machinery to reasonable hours with the express purpose of protecting the amenity of residents. The application does not provide any further detail on the level of nuisance caused by the site, either in the form of a record of complaints to the Local Authority or by any assessment of the impact of the site via monitoring or testing. The application therefore fails to demonstrate that any significant harm is ongoing as a result of the current use of the site and it would therefore be inappropriate for the Local Planning Authority to attach significant weight to this purported benefit. The application has also failed to demonstrate that redevelopment of the site to provide a larger grain store (considered necessary for the business needs) and re-provide the car repair business could not utilise a layout, access arrangements, building insulation and more modern, quieter plant which would negate any additional impact on neighbours.
It is clear from a detailed assessment of the overall impacts of the proposed development on the Green Belt and the purported benefits of the scheme, that the impact of the overall development on the Green Belt would not be outweighed by the benefits of the scheme. Furthermore, it is clear that the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF. It is also clear that the overall impact of the development on the Green Belt is one of significant harm, through both inappropriateness and other harm, and that the specific policies of the NPPF relating to the Green Belt indicate that development should be restricted.

Furthermore, the objections from the Lead Local Flood Authority and the SCDC ecologist, as well as other harm which would result to the character and appearance of the Conservation Area, constitute significant additional ‘other harm’ which tips the balance of harm even further.

It is therefore incumbent on the Local Planning Authority to refuse planning permission. Given the Council's Scheme of Delegation, the requests of the parish Council for the application to be referred to Committee do not trigger an application to be considered by Planning Committee where an application is to be refused and the application should therefore be refused under delegated powers.

**Balance of the impacts of the Grain Store Development**

The relocation of an enlarged grain store facility to the Fowlmere Road site would cause very significant ‘other harm’ to the character and openness of the Cambridge Green Belt in a prominent, open and relatively flat location. It would have a substantially greater harmful impact on the Green Belt than does the existing grain store facility on Lodge Road which is predominantly outside of the Green Belt. The applicant's PDAS states that the proposed grain store site has been identified as the site with the fewest negative impacts. However, this justification incorrectly assumes that the existing grain store must be relocated and takes this as the starting point for identifying potential sites. Clearly, the grain store does not have to be relocated. It is a consented development which can continue operating. As has been shown above, no evidence has been provided that the existing operation causes any significant environmental harm requiring relocation or any other significant benefit. Alternatively, the exiting site is large enough that it could be redeveloped should a larger facility be required. Given the harm which would be caused to the Green Belt by the proposed Grain Store, the existence of an alternative suitable site, within the applicant’s ownership, largely outside the Green Belt is material in the consideration of the Green Belt impact. It demonstrates that the harm to the Green Belt is entirely unnecessary and avoidable. The availability and suitability of the existing site is the correct starting point for the consideration of the justification of the harm to the Green Belt, not the false assumption that it must be relocated.

Given the parallel applications submitted, the main driver for the relocation appears to be the freeing up of the existing site for residential redevelopment and the benefit of such housing is the only remaining purported justification for relocating the grain store facility. The NPPG makes it clear that unmet housing need is unlikely to outweigh harm to the Green Belt. The proposed relocation of the grain store cannot therefore be justified on the basis of housing need as the harm to the Green Belt outweighs the benefits. The harm to the Green Belt which would result from the Grain Store is therefore clearly not outweighed by any other considerations.

On that basis the proposed Grain Store is contrary to national and local Green Belt policy and must be refused. It is also noted that the Council's Sustainable Drainage Officer has recommended refusal on the grounds of inadequate surface water drainage measures with the site, concerns echoed by the LLFA.

**Balance of the impacts of the Car Repair Workshop**

As detailed above, the retention of the existing car repair business is a requirement of local planning policy. The relocation to the Brook Road site would cause harm to the Green Belt.
through inappropriateness and other harm to openness and character. The applicant’s PDAS states that the proposed site has been chosen given a search of all other suitable sites around Thriplow and the Very Special Circumstances case for the development hinges solely on the need to retain the business and the lack of other suitable sites. However, the VSC case fails as it presumes as a starting point for the proposal that the garage has to be relocated to free up the site for redevelopment. This presumption avoids the critical issue which is that the existing garage is a consented development operating successfully on the existing site without causing harm to neighbours. It can be retained there with no impact on the Green Belt and without causing any other harm locally. Given the size of the site, it could also be retained there as part of a scheme for a larger grain store which the applicant states is required for the agricultural business.

The sole circumstance in which the business cannot remain on site is if the site is to be redeveloped for housing. But that redevelopment cannot be used as a starting point for consideration of the application, the starting point must be that the relocation would cause harm to the Green Belt and this dictates that the site cannot be considered suitable for residential redevelopment. As detailed above, the NPPG has made it clear that unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute very special circumstances. The proposed relocation of the car repair business cannot therefore be justified on the basis of housing need and the VSC case fails as it avoids the option of retaining the business on the existing site.

The proposed Car Repair Workshop is therefore contrary to national and local Green Belt policy and must be refused.

Lack of deliverability of the Residential Development

As detailed above, both the Car Repair Workshop and the Grain Store must be refused due to harm to the Green Belt and the lack of any very special circumstances that would outweigh that harm. Given the policy requirement for the car repair business to be retained and the reliance of the agricultural business on the existing grain store and, as the applicant has detailed, the absence of alternative suitable sites for those developments, the proposed Residential Development cannot be delivered.

You will be aware that the deliverability of housing schemes which are justified on the basis of a lack of a 5 year supply is a material consideration in whether or not applications should be approved. Notwithstanding the other material reasons which indicate that the Residential Development should be refused, the lack of deliverability critically undermines the 5 year supply arguments made in support of the Residential Development.

The lack of deliverability should therefore form a separate refusal reason for the application for Residential Development. It is also further evidence that the overall proposed development of all three applications must be considered as a whole and determined together.

On the basis of the above, each of the applications should be recommended for refusal. As refusing the applications would not meet the definition of any of the six triggers for referral to the Council’s Planning Committee as per its Scheme of Delegation, the applications should be refused under delegated powers.

Yours sincerely,

Dan Smith