

Cambridge City and South Cambridgeshire Local Plan
Examination

Statement for Matter PM2: Green Belt Review Methodology

On behalf of St John's College, Cambridge (ID 3084)
Representation Number: 65951, 66019

Does the Cambridge Inner Green Belt Study (November 2015) (RD/MC/030) use a methodology which enables a clear and transparent assessment of how the existing Cambridge Green Belt performs against the purposes of including land in the Green Belt, with particular reference to:

a. Baseline studies and analysis

b. The identification of areas for assessment (the sectors and sub sectors)

c. Identification of qualities/assessment criteria – are all 16 clearly related to Green Belt purposes.

1.1 Savills (UK) Limited are instructed by St John's College, Cambridge, to submit the necessary Hearing Statements to the Examination of the Cambridge City and South Cambridge Local Plans. This pre-hearing statement amplifies previous submissions made, most recently our response to modification PM/CC/2/E in the Cambridge and South Cambridgeshire Modifications Report November 2015 (RD/MC/010).

1.2 We do not consider that the Cambridge Inner Green Belt Study (CIGBS) provides a clear and robust assessment of the Cambridge Inner Green Belt against the purposes of the Green Belt, as defined in the NPPF.

1.3 As stated at paragraph 79 of the NPPF:

“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.”

The CIGBS does not specifically refer to paragraph 79 which provides the overarching aim of Green Belt policy at a national level. When identifying assessment criteria and suitable areas of land for Green Belt release, the openness and permanence of the land should be the key considerations.

1.4 Paragraph 80 goes on to identify 5 purposes which the Green Belt serves:

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

1.5 At a local level, the Cambridge Green Belt is defined as having three purposes¹ as follows:

¹ Cambridge Local Plan 2014, Proposed Submission, July 2013, paragraph 2.50

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

1.6 Cambridge Green Belt purposes 1 and 2 derive from national Green Belt purpose 4, whilst Cambridge purpose 3 derives from national purpose 2.

Baseline studies and analysis

1.7 The CIGBS identifies 16 qualities/assessment criteria which are considered to directly contribute to the performance of the Cambridge Green Belt. These are drawn from the baseline studies and analysis presented in Section 4 of the report.

1.8 Whilst it is acknowledged that there is no recognised methodology for a Green Belt review, the LDA study is primarily based on a landscape assessment methodology. Emphasis is placed on the role and function of Cambridge's townscape and landscape which do not directly relate to Green Belt purposes and would be more informative to a landscape assessment.

1.9 For example, the Study continually refers to the 'Winchester Study' (*Winchester City and its Setting*, Winchester City Council (1998)) in relation to the role and function of townscape and landscape.² Winchester does not have a Green Belt and thus its relevance to the purposes of the Cambridge Green Belt is questioned.

Sectors and sub-sectors

1.10 In response to comments made regards the size of the sectors assessed in the 2002 Green Belt Study, LDA further divided these sectors into sub-areas where there were clear changes in the characteristics which would affect the application of the assessment criteria to different areas of land. However, the size of the sectors and sub-areas are still largely broad brush and do not clearly relate to their surroundings.

1.11 Sector 3, for example, is divided into 3 sub-areas. Area 3.1 is by far the largest extending from the M11 to the edge of the city. In assessing the suitability of the site, it is difficult to see how land adjacent to the M11 relates to land immediately adjacent to the edge of Cambridge. Failure to divide the sites appropriately means that pockets of land which could be considered appropriate for release in accordance with the requirements of paragraph 84 and 85 are missed or at best are considered as a part of a larger parcel whose characteristics may be totally different.

² Paragraphs 2.3.17, 2.3.18, 3.2.11, 4.14.1, 4.14.5

Identification of purposes

- 1.12 In identifying the 16 qualities of the Cambridge Green Belt, and indeed when assessing the individual parcels, significant weight is applied to the preservation of the historic and natural environment and the potential impact of development. Whilst they may be of high value – although the eminence of the landscape surrounding Cambridge is debateable – the conservation of a particular quality cannot be a reason to designate or retain the area as Green Belt.
- 1.13 The strict application of the five Green Belt purposes identified in the NPPF means that the quality of the landscape of an area should not be a consideration when assessing the contribution of Green Belt to the fulfilment of Green Belt purposes. Areas of high landscape value are preserved and protected by other statutory means, for example Areas of Outstanding Natural Beauty, designated wildlife sites and Conservation Areas.
- 1.14 In light of the above, it is not considered that all of the 16 qualities/assessment criteria identified directly relate to Green Belt purposes. They are effectively a list of the key attributes of Cambridge which have been loosely applied to Green Belt purposes. In particular, we question the relevance of the following qualities to Green Belt purposes:
- 4. A city of human scale easily crossed by foot and by bicycle;
 - 5. Topography providing a framework to Cambridge;
 - 6. Long distance footpaths and bridleways providing access to the countryside;
 - 10. Good urban structures with well-designed edges to the city
 - 14. Designated sites and areas enriching the setting of Cambridge.
- 1.15 Furthermore, qualities 5, 7, 8, 9, 10, 14, 15 and 16 all broadly relate to the setting of the city and its appreciation from the surrounding landscape and it is considered that they could have been considered as one or at a maximum two qualities/assessment criteria.

Transparency

- 1.16 The identification of 16 qualities which cannot be readily applied to the purposes of including land in the Green Belt does not make for a clear and transparent assessment of the Cambridge Green Belt.
- 1.17 The failure to apply any relative scoring system (e.g. high, medium, low) makes it difficult to compare the different sectors and judge the relative suitability of those sectors proposed for release against those that are to remain.

- 1.18 The lack of any form of scoring system also makes it difficult to justify and draw robust conclusions as to why certain sectors are appropriate for release over others. For example, the release of land from Sector 11 is partly justified as ‘the Green Belt boundary would be no further from the historic core than existing boundaries to the east of Cherry Hinton.’ The same conclusions could be drawn for other sectors i.e. Sector 3 would be no further from the historic core than the West Cambridge development site boundary.
- 1.19 The most transparent means of assessing the Green Belt would be to assess each sector and sub area against the defined national Green Belt purposes, as is the accepted norm for such studies. In order to ensure appropriate measure is given to the purposes of the Cambridge Green Belt, purpose 4 - to preserve the setting and special character of historic towns – should be replaced with Cambridge purposes 1 and 2 – (1) Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre and (2) Maintain and enhance the quality of its setting.

Conclusions

- 1.20 For the above reasons, and the reasons provided in our response to PM/CC/2/E, we do not consider that the CIGBS provides an appropriate, transparent and robust assessment of the performance of the Cambridge Green Belt. Therefore, in using this document as a key piece of evidence to the Local Plan, the Cambridge and South Cambridgeshire Local Plans, cannot be considered justified or consistent with national policy and therefore cannot be found sound