

Cambridge City and South Cambridgeshire Local Plan Examination Matter PM2 – Green Belt Review Methodology

Issue PM2.1

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?**

Overview of Methodology

- 1.1. As previously set-out within the CEG Representations to the Proposed Modifications¹, the methodology employed by the 2015 Cambridge Inner Green Belt Boundary Study undertaken by LDA (RD/MC/030) (the 2015 Study) has failed to address the Council's requirements, in response to the Inspector's preliminary conclusions, for a 'robust, transparent and clear understanding of how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt'.
- 1.2. As detailed as Appendix 3 to CEG's Representations², Tyler Grange has identified a number of key flaws and soundness concerns.
- 1.3. The Study does not provide a clear explanation or justification of how land within those sectors and sub areas assessed contributes to the Green Belt and does not allow for the clear identification of areas of land that are suitable for release from the Green Belt.
- 1.4. For these reasons, the methodology employed by the 2015 Study does not address the initial concerns raised by the Inspectors with regard to the assessment of the contribution of land to the Cambridge Green Belt.
- 1.5. It is also worthy of noting that the 2015 Study has set aside the work undertaken by the Councils within the 2012 Inner Green Belt Study³ and provided the Inspectors with an entirely new Green Belt evidence base which followed policy preparation and is not the work of the Council.

¹ Representation Refs: 65992-66019 and 66020-66021 esp. 65995, 65996, 65998, 66000, 66003, 66004, 66007, 60014, 60015, 60016, 60020, 60021

² Cambridge South East: Appendix 3 – Technical Paper in support of CEG Representations regarding the Green Belt Study, 25 January 2016 (report: 1665/_R11a)

³ RD/Strat/210 – 2012 Inner Green Belt Boundary Study, Cambridge City Council and South Cambridgeshire District Council

Proposed Amendments to the Cambridge Inner Green Belt Study, November 2015

- 1.6. Since the submission of the previous Representations, LDA have published a supplement to the 2015 Study⁴ following the consultation on the Proposed Modifications in response to the representations made. This sets-out a number of proposed amendments to the parameters for Green Belt release at Sector 11.
- 1.7. CEG's interpretation of the 2015 Study's original parameters for Green Belt release within Sector 11 is illustrated at **Appendix 1**⁵.
- 1.8. The need for further clarity and the re-drafting of evidence to retro-fit the justification for the Council's proposed allocation sites clearly demonstrates the inadequacies of the 2015 Study's methodology in identifying criteria that allow for a robust, transparent assessment when assessing the contribution of land to the Green Belt and subsequent identification of areas suitable for release.
- 1.9. For example, when assessing land within Sector 11 at southeast Cambridge, under Item 3 (page 10), LDA state that CEG's interpretation of the parameters for Green Belt Release at Sector 11 is incorrect, and makes a number of suggested amendments to the parameters to justify the proposed allocation sites GB1 and GB2.
- 1.10. The amendments seek to provide clarification on the need for development to retain open rural land at the foot of the Gog Magog Hills through limiting the eastward extent of development within sub areas 11.1 and 11.2. The justification for this is implied by the assessment against Assessment Criteria 8. 'Significant areas of Distinctive and Supportive townscape and landscape' which identifies that:

"The flatter land in the western parts of this sector forms part of the rural foreground to the city as seen in elevated views from the south and east."
- 1.11. As illustrated in key elevated views from these locations included within Part 2 of the 2015 Study (Figure 19, Photograph 7 from Magog Down and Photograph 8 from Wort's Causeway) (see **Appendix 2**), Sub Areas 11.1 and 11.2 are well contained, with the rolling landform of the Gog Magog hills forming the foreground. Development up to the eastern boundary with Cherry Hinton and Limekiln Road would not impact on the rural foreground appreciably more than the proposed reduced area to the west as perceived from these views.
- 1.12. Amendments within the supplement for Sector 11 also relate to the need to retain clear separation between a new urban gateway and the Babraham Road Park and Ride site. It is unclear as to why there is a need to provide a 'substantial buffer' between any development and the Park and Ride site.
- 1.13. The 2015 Study Supplement still does not indicate a clear line on any drawings to show where an acceptable limit to development would be. This further highlights the failure of the methodology employed to provide a robust, transparent assessment that can be used to identify potential areas for release from the Green Belt.

⁴ Cambridge Inner Green Belt Study (November 2015) Supplement, LDA Design for Cambridge City Council and South Cambridgeshire District Council, March 2016 (RD/MC/031).

⁵ CEG Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016: Figure 3.1 'Parameters for Green Belt Release' pages 23 – 24.

a) Baseline Studies and Analysis

- 1.14. The 2015 Study includes a number of baseline studies and analysis that have been used to inform the identification of 'Qualities Relevant to Green Belt Purposes'. The study considers these to have a bearing on how issues raised by Green Belt purposes (sprawl, merging, encroachment, setting and character) are manifested in Cambridge and its surrounding landscape (paragraph 3.2.6).
- 1.15. Despite this, a number of the aspects considered within the 2015 Study are not relevant to the purposes and function of the Green Belt. and include the following⁶:
- Environmental Designations;
 - Cultural Designations;
 - Recreational Routes; and
 - Country Parks.
- 1.16. The baseline studies also include generalised information that cannot be used to provide specific evidence to assist in the undertaking of a clear and transparent assessment of the performance of the Cambridge Green Belt. This is reflected in the identification of qualities and assessment criteria that are overly subjective and not measurable.
- 1.17. Examples of these aspects include the following:
- Townscape Character;
 - Landscape Character; and
 - Townscape and Landscape Role and Function – including identification of large areas of Supportive Landscape.
- 1.18. Whilst these aspects consider the setting and character of Cambridge as a historic town, they include features that are neither unique nor distinctive to Cambridge, and which are therefore of limited or no relevance to this purpose.
- 1.19. Furthermore, given the expansion of the city, the character and setting of the historic core has been eroded. Consideration of the modern townscape character and built edges is therefore unrelated to the setting and character of the historic core in most cases.
- 1.20. The Baseline Studies and Analysis place an emphasis on issues relating to the character and setting of Cambridge. This has filtered down into the identification of the Special Qualities and Assessment Criteria used by the Study, therefore suggesting an over-emphasis being placed on the importance of setting in balance against the overall assessment of the Green Belt.

Inconsistency in Recording and Analysing Baseline Studies

- 1.21. Some Aspects are inconsistently interpreted across different areas of Cambridge, leading to recommendations for release of Green Belt that do not reflect the baseline conditions. An example of this is the definition and recording of urban gateways at southeast Cambridge (Sectors 11 and 13).

⁶ As detailed within Cambridge South East: Appendix 3 – Technical Paper in support of CEG Representations regarding the Green Belt Study, 25 January 2016 (report: 1665/_R11a)

- 1.22. The 2015 Study identifies Approaches and Gateways as an aspect of relevance to the Green Belt in light of their influencing the perception of the character and scale of the city. The location of urban gateways as defined by the 2015 Study is illustrated on Figure 10: Gateways and Approaches, a copy of which is included at **Appendix 3**.

Parameters for Green Belt Release - Sector 11 Southeast Cambridge

- 1.23. The 2015 Study identifies land within Sector 11 (sub areas 11.1 and 11.2) as having the ability to accommodate development without significant long-term harm to Green Belt purposes.
- 1.24. The urban gateway along Hills Road at Sector 11 is identified as being marked by:
- " ... suburban housing and Addenbrooke's Hospital, which is a prominent landmark on the edge of the city."*
- 1.25. This is despite the location of the Babraham Road Park and Ride, a car dealership, school, residential properties and office units located further to the east at the junction of Babraham Road and Cherry Hinton Road.
- 1.26. Tyler Grange's drawing 'Cambridge Park and Ride Sites and Urban Gateways' (1665/P133b) at Appendix 4 illustrates the location of Park and Ride sites and adjacent development in relation to the urban gateways as defined by the 2015 Study.
- 1.27. The urban gateway approach along Newmarket Road to the northeast is marked by commercial urban fringe development, including car showrooms. It is worthy of note that the Park and Ride on Newmarket Road lies outside the Green Belt but is situated within the extent of a Major Development Site as allocated in the South Cambridgeshire LDF (see **Appendix 4**)
- 1.28. Parameters set-out for the for release of Green Belt in Sector 11 do not recognise the Park and Ride site or car dealership on Babraham Road as an existing urban gateway, instead suggesting that a new urban gateway is created, and that a buffer be retained between the Park and Ride and the new gateway. This is despite the similarity with the Newmarket Road approach.
- 1.29. Inconsistency in recording the Baseline information has contributed to the 2015 Study and subsequent March 2016 Supplement making recommendations that limit the potential for release of land from the Green Belt by failing to recognise the presence of existing urban gateway features on a main approach to the city.
- 1.30. The CGI image at **Appendix 5**, demonstrates how development in Sector 11 would appropriately relate to the Babraham Road Park and Ride and associated gateway features.⁷

⁷ The CGI image has been prepared by Scott Brownrigg, and reflects the Illustrative Masterplan as included within the Development Prospectus contained at Appendix 7 of CEG's Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016.

Parameters for Green Belt Release – Sector 13 Southeast Cambridge

- 1.31. Sub area 13.1 includes an area of land considered by the 2015 Study as suitable for release from the Green Belt. The parameters defining the extent of release in this location south of Cambridge Road state that:
- ” The boundary of any land released in the north western corner of sub area 13.1 should extend no further south than the existing southern edge of Peter house Technology Park and no further east than the Yarrow Road roundabout, which is the furthest extent of the urban area from the historic core.”*
- 1.32. The urban gateway to Cambridge along Cambridge Road is identified as being to the east of the Yarrow Road Roundabout, opposite the modern Alms Houses development and entrance to Fulbourn Hospital. This is illustrated on Figure 10 ‘Gateways and Approaches’ (Appendix 3).
- 1.33. Although shown on Figure 10, the urban gateway on Cambridge Road is not identified or described within the Baseline Studies and Analysis, nor is it assessed against the Assessment Criteria for Sector 13. In this instance, the Baseline Studies do not provide a robust piece of evidence to support the parameters and recommendations for Green Belt release.
- 1.34. CEG’s interpretation of the parameters for Green Belt release at Sub-area 13.1 are illustrated at **Appendix 6**⁸

⁸ CEG Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016: Figure 3.3 Proposed Reversion to Original E/2 allocation in Submission Draft South Cambridgeshire Local Plan

b) Identification of Areas for Assessment

- 1.35. Although LDA have amended the sectors and sub-areas from those that were included within the Councils' original 2012 Inner Green Belt Boundary Study, the Sectors and sub areas that form the basis of the assessment still include a number of large parcels of land⁹.
- 1.36. This is despite LDA stating that, when defining sub areas:
"Most sectors were therefore divided into sub areas where there were clear changes in these characteristics which would affect the application of the assessment criteria to different areas of land. This enables a robust and transparent assessment of the various sub areas."
 (paragraph 3.2.5)
- 1.37. As identified within Tyler Grange's technical report that supported CEG's representations to the Proposed Submission Draft Joint Local Plan¹⁰ the assessment of large areas of land at a broad scale does not allow for consideration of how smaller parcels of land may or may not contribute to the Green Belt. This results in assessment criteria being applied across the whole area, skewing the results. As illustrated on Figure 2: 'Assessment Sectors and Sub Areas', the Study continues to include large parcels of land within the assessment.
- 1.38. These include large Sectors and sub areas at southeast Cambridge, with sub areas 12.1 and 13.1 covering wide areas that cross several fields. The 2015 Study identifies land within sub area 12.1 south of Peterhouse Technology Park and sub area 13.1 south of Cambridge Road as suitable for release from the Green Belt without causing significant harm to its purposes.
- 1.39. Notwithstanding criticism of the methodology employed and inconsistencies within the LDA assessment relating to the parameters used and extent of release identified, this highlights the fact that there are smaller parcels of land that may make a more limited contribution to the Green Belt purposes than other areas of land within the same sub area.
- 1.40. However, as is the case with the sub area 13.1, by not defining a smaller parcel of land using boundaries on the ground, the proposed extents of release can be the subject of uncertainty. In this instance, the tree belt and access track to Westbourne Farm running south from Cambridge Road/Fulbourn Road would form a clear boundary for both the definition of a sub area and new Green Belt boundary should the land be released.
- 1.41. The consequence of this methodological flaw is a failure to appropriately assess the value in Green Belt terms of opportunities for sustainable development on the edge of the City which would otherwise accord with the Councils' own sustainable development sequence and could provide locations to promote sustainable patterns of development.

⁹ As illustrated on Figure 2: 'Assessment Sectors and Sub Areas', the 2015 Cambridge Inner Green Belt Boundary Study (RD/MC/030)

¹⁰ 1665_R06b Green Belt Review – Technical Report 20 September 2013

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

- 1.42. No. As set-out above, the Baseline Studies include a number of aspects that are not clearly related to the purposes of the Green Belt, or are too generalised and apply to large areas so as to not to provide an evidence base to which measurable or defined criteria can be applied.
- 1.43. The Baseline Studies are biased towards consideration of setting and character and contain largely subjective information that relates to matters such as the role of the landscape in providing supporting or defining character, and the role of topography in facilitating views to and across the city and as part of its wider setting.
- 1.44. This bias towards setting and aspects that are not directly attributable to the Green Belt feeds into the Special Qualities that are used to inform the Assessment Criteria used within the 2015 Study. As set-out on the table at page 59 of the 2015 Study, 15 out of the 16 qualities identified are indicative of the National Green Belt purposes regarding setting, and 12 being indicative of the Cambridge Green Belt purposes relating to setting. A copy of the table is included at **Appendix 7**.
- 1.45. As detailed within the review of the 2015 Study's methodology contained at Appendix 3 of CEGs representations to the Proposed Modifications, several of the 6 qualities defined by the 2015 Study are not based upon adopted policy, do not clearly relate to the 5 NPPF purposes, or are not specific to Cambridge. These are identified as:
- A city of human scale easily crossed by foot and bicycle;
 - Long distance footpaths and bridleways providing access to the countryside;
 - Good urban structure with well-designed edges to the city; and
 - Designated sites and areas enriching the setting of Cambridge.
- 1.46. By using 16 qualities that do not clearly relate to the 5 NPPF purposes, and which are not specific to Cambridge, the 2015 Study does not allow for a clear assessment of how land contributes to the Cambridge Green Belt. The breadth of the 16 qualities also introduce to the Green Belt Assessment matters which relate to the wider consideration of promoting sustainable patterns of development (NPPF para. 84 refers) and consequently the significance in Green Belt terms of the land assessed cannot be clearly understood from the 2015 Green Belt Study.

Way Forward

- 1.47. The 2015 Study has identified locations on the edge of Cambridge that are assessed as being appropriate to accommodate development and release of Green Belt land. These include areas within Sectors 11 and 13 at southeast Cambridge. As set-out within CEG's representations and summarised above, the parameters identified within the 2015 Study allow for a degree of interpretation, with there being scope for larger areas of release (for sustainable development) at proposed sites GB1 and 2 (CCC) and E2 (SCDC).
- 1.48. If, as suggested within CEG's Matter PM1 Statement, it is identified that there is a need for additional housing to meet OAN, further Main Modifications affecting the Green Belt boundary may be made in parallel with the ongoing progression of the Examination. In this instance, the correct interpretation of the 2015 Study to include additional development on the edge of Cambridge in line with the development sequence and spatial strategy could be taken forwards before all of the omission sites have been assessed.

- 1.49. However, due to the shortcomings of the 2015 Study and Supplement summarised above (and considered in detail in CEG's previous representations¹¹) this latest Green Belt Review cannot be relied upon as the basis upon which to set boundaries which will endure. There therefore needs to be further, new Green Belt evidence based upon a robust and transparent assessment to inform the early review of the Local Plans. CEG Matters Statement on Issue PM1B.4 sets out the scope of an early review and explains why this requirement should be set-out in policy.¹²

2988 Words

¹¹ Cambridge South East: Appendix 3 – Technical Paper in support of CEG Representations regarding the Green Belt Study, 25 January 2015 (report: 1665/_R11a)

¹² CEG Matters and Issues Statement, Matter PM1: PM1B.4 – paragraphs 2.8 – 2.14

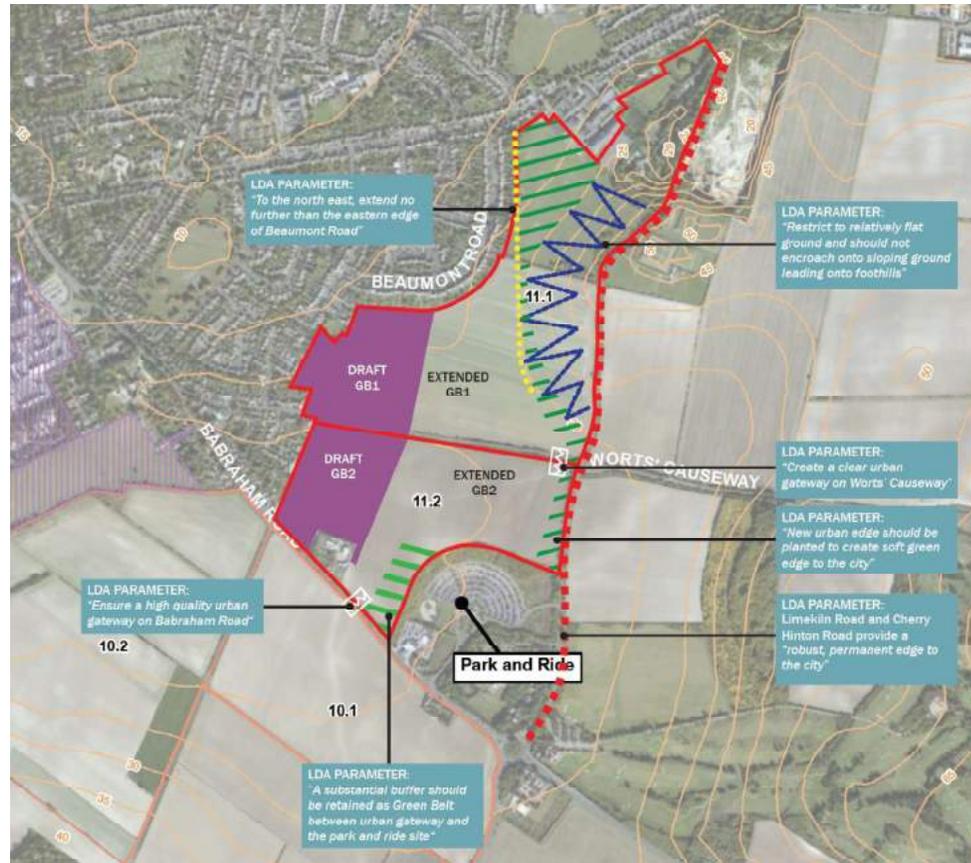


Appendix 1

CEG Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016: Figure 3.1 'Parameters for Green Belt Release'

not appear to have followed. CEG's interpretation of these limits is shown on Figure 3.1 below.

Figure 3.1 Parameters for Green Belt release



Source: Cambridge Inner Green Belt Boundary Study - p.144 / NLP analysis

- 3.11 The land identified, with an area of 28ha (including GB1 and GB2) could yield capacity for up to 1,260 dwellings as part of a sustainable urban extension to Cambridge, an extra c.800 beyond the existing proposed allocations.
- 3.12 The Councils' Development Strategy Update makes clear that the edge of Cambridge remains higher in the development sequence than new settlements, and has an advantage in terms of accessibility and proximity to employment, and recognises this "as an advantage". On top of this (and not acknowledged by the Council) is the ability of development on the edge of Cambridge to deliver additional affordable housing at 40% (instead of the 20% or less prevalent at New Settlements). The only factors the Council identify as a reason for not increasing further the release of edge of Cambridge development is the findings of the Inner Green Belt Boundary Study 2015 which is purported to conclude that it is unlikely that any development could be accommodated without substantial harm to Green Belt purposes.
- 3.13 It follows, even if one accepts the Councils' approach to the planning balance, that where there is land that the Inner Green Belt Boundary Study 2015



Appendix 2

Cambridge Inner Green Belt Study (November 2015) (RD/MC/030) Figure 18: Photographs 7 and 8 (drawing no. 4732_018)

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Photograph 7: Magog Down

This elevated viewpoint on the edge of the Gog Magog Hills allows views across much of Cambridge. It demonstrates Cambridge's location within a bowl landform, surrounded by the Western Claylands and the Gog Magog Hills to the south. The soft green nature of the city is readily apparent from this location, with landmark features in the historic core rising above the vegetation. The reduced green edge at Addenbrooke's Hospital, as a result of ongoing development, seen across the rural landscape of Sector 10, is also noticeable from this viewpoint.



Photograph 8: Worts' Causeway

This viewpoint allows elevated views over Cambridge from the Gog Magog Hills. It shows the more sprawling expansion that has occurred to the east and south east of Cambridge, but also demonstrates, through the visibility of landmark features within the historic core, the compactness of the city centre. The lower slopes of the Gog Magog Hills form the rural foreground, with the undulating landform in Sectors 11 and 12 readily apparent.

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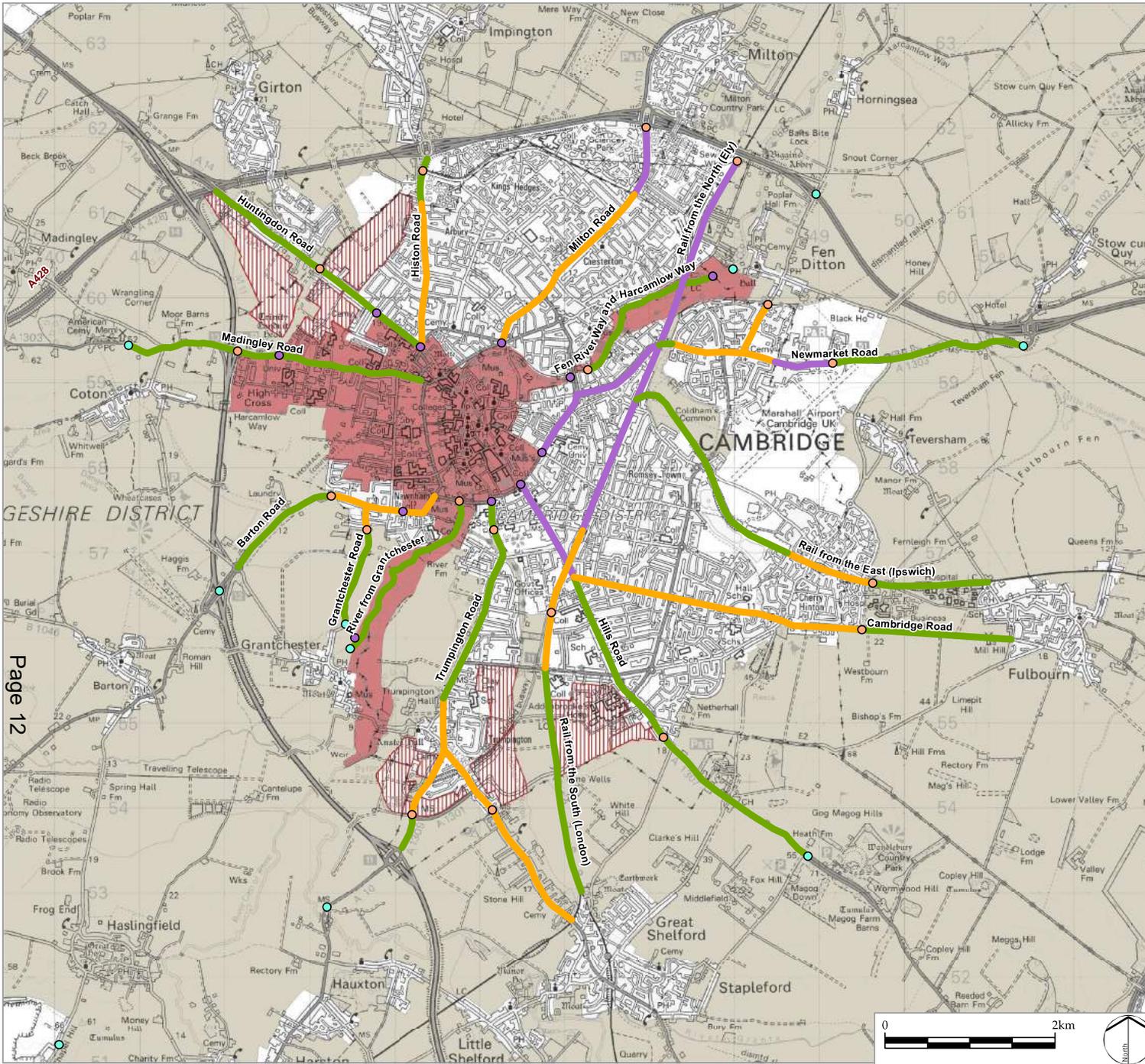
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 CAMBRIDGE INNER GREEN BELT BOUNDARY STUDY

DRAWING TITLE
 Figure 18: Photographs 7 and 8



Appendix 3

Cambridge Inner Green Belt Study (November 2015) (RD/MC/030) Figure 10: Gateways and Approaches (drawing no. 4732_010)



LEGEND

- Rural land within Green Belt
- Developments under construction / permitted
- Distinctive Cambridge
- Gateways**
- Gateway to distinctive Cambridge
- Urban gateway
- First view of Cambridge
- Character of Approaches**
- Green/treed
- Suburban
- Commercial

LD A DESIGN

PROJECT TITLE
CAMBRIDGE GREEN BELT STUDY

DRAWING TITLE
Figure 10:
Gateways and Approaches

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No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.
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Sources: Ordnance Survey, Cambridge City Council





Appendix 4

Cambridge Park and Ride Sites and Urban Gateways (drawing 1665/P133b)



-  Park and Ride Locations
-  Urban Gateways
(as illustrated on Figure 10: Gateways and Approaches of the LDA Design Cambridge Green Belt Study - November 2015)
-  Major Development Site
(South Cambridge LDF)
-  Area of Major Change
(Cambridge Local Plan 2006)
-  Photoviewpoint Locations



Project Southeast Cambridge

Drawing Title **Cambridge Park and Ride Sites and Urban Gateways**

Scale As Shown (Approximate)

Drawing No. 1665/P133b

Date May 2016

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Appendix 5

CGI produced by Scott Brownrigg reflecting the Illustrative Masterplan as included within the Development Prospectus contained at Appendix 7 of CEG's Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016

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CGI produced by Scott Brownrigg reflecting the Illustrative Masterplan as included within the Development Prospectus contained at Appendix 7 of CEG's Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016.





Appendix 6

CEG Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016: Figure 3.3 'Proposed Reversion to Original E/2 allocation in Submission Draft South Cambridgeshire Local Plan'

The re-instatement of land originally included as part of allocation site E/2 in South Cambridgeshire in the Submission Draft Plan to reflect practical deliverability of the site and define a defensible Green Belt boundary

- 3.15 Within the Development Strategy Update (RD/MC/060), errors in the Inner Green Belt Boundary Study 2015 in respect of sub-area 13.1 have led the Council to mistakenly reduce the size of the proposed allocation E/2 in order to reflect the LDA parameters which state that development should not extend eastwards beyond the Yarrow Road roundabout. The allocation site previously extended further eastwards to the field boundary north of Westbourn Farm.
- 3.16 Unfortunately, the justification for this amendment (summarised in paragraph 4.79 of RD/MC/060) is flawed for the reasons set out in Section 2.0. and the Council’s original Submission Draft proposal in terms of the eastern extent of the allocation was correct.
- 3.17 For these reasons, the former larger E2 employment site would be an appropriate release from the Green Belt and should be re-instated as an allocation in the SCDC Local Plan, on the basis of the principles summarised in Figure 3.3 below.

Figure 3.3 Proposed Reversion to Original E/2 allocation in Submission Draft South Cambridgeshire Local Plan



Source: Tyler Grange



Appendix 7

Cambridge Inner Green Belt Study (November 2015) (RD/MC/030) Qualities Relevant to Green Belt Purposes (table extracted from pages 59-60) drawing no. 4732_010)

Qualities Relevant to Green Belt Purposes	National Green Belt Purposes				Cambridge Green Belt Purposes		
	1. Sprawl	2. Merging	3. Encroachment	4. Setting/ Character	1. Character	2. Setting	3. Merging
1. A large historic core relative to the size of the city as a whole	*			*	*		
2. A city focussed on the historic core				*	*		
3. Short and/or characteristic approaches to the historic core from the edge of the city	*			*		*	
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				*		*	
7. Key views of Cambridge from the surrounding landscape				*		*	

8. Significant areas of Distinctive and Supportive townscape and landscape				*	*	*	
9. A soft green edge to the city			*	*		*	
10. Good urban structure with well-designed edges to the city	*						
11. Green corridors into the city	*			*	*	*	
12. The distribution, physical and visual separation of the necklace villages		*		*	*	*	*
13. The scale, character, identity and rural setting of the necklace villages		*		*		*	*
14. Designated sites and areas enriching the setting of Cambridge				*		*	
15. Elements and features contributing to the character and structure of the landscape	*			*		*	
16. A city set in a landscape which retains a strongly rural character			*	*		*	