

Cambridge City and South Cambridgeshire Local Plan Examinations

Our ref 13577/MS/NB
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Date 30 May 2017

Subject MATTER M11.4: Joint Omission Sites (Cambridge South East)

1.0 Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?

1.1 Yes, the allocation of additional land at Cambridge South East is necessary for the soundness of both Local Plans for reasons we set out below. CEG's objection is not driven by subjective views on the merits of one possible allocation over another: all things being equal, the Plans are the responsibility of the Councils and they must make these choices. However, in addition to concerns expressed in other Matters (e.g. on OAHN, the effectiveness of the Plans in respect of infrastructure for new settlements), this Matter's relationship to 'soundness' is driven by two fundamentals:

- 1 The choices made by the Council have not been justified, when considered against reasonable alternatives. This relates to material errors and a lack of evidence informing assessments made in the Sustainability Appraisal Addendum (SAA) (RD/MC/021); and
- 2 Consistency with national policy, notably in respect of the assessment of Green Belt and the lack of justification for the Green Belt boundaries proposed for GB1 and GB2 and the failure to properly consider how either of CEG's omission sites would be consistent with paras 84 and 85 of the NPPF.

1.2 CEG has two omission sites under consideration:

- 1 the first (a site for, inter alia, 3,500-4,500 dwellings) was submitted in response to the Submission Draft Plan in 2013 and is assessed in the SAA as Site Ref CCSC1005¹; CEG maintains concerns about how this was appraised, but in the interests of the Plans progressing expeditiously, wishes to focus attention on the second omission site;
- 2 The smaller site (of up to 1,200 dwellings) was submitted with its representations to the Main Modifications² and responded to the LDA Inner Green Belt Review (IGBR) (RD/MC/030). It represents an extension of GB1 and GB2 within the parameters established by LDA³. It is assessed by the Councils in the SAA as Site Ref CCSC1005a⁴. We refer to it hereafter as "**Extended GB1/GB2**" and wish this to be the focus of discussion.

1.3 We will cross refer principally to the Council's evidence base (as referenced above, plus the Development Strategy Update – RD/MC/060) and the following documents:

¹ Pages 266 – 278 of the SAA

² The Omission site is described in Section 3.0 and Appendix 7 to CEG's Main Modifications, with an SA included at Appendix 6. A visual representation of the proposal is at Appendix 5 to CEG's Matters Statement PM2-17653

³ This is before LDA hastily rewrote their evidence base in the form of its "supplement" RD/MC/031

⁴ Pages 494-503 of the SAA.

- The substantive objection submitted by CEG in response to the Main Modifications (dated 25 January 2016)⁵,
- CEG’s Matter PM2 Statement and Supplement (PM2-17653)

1.4 We have included two focused pieces of technical analysis as Annexes to this Statement. The first deals with agricultural land quality and the second provides a site-specific analysis of the Green Belt issues⁶.

2.0 Why are CEG’s omission sites a soundness issue?

2.1 The Councils recognise that the edge of Cambridge is the second most sustainable location (after the City Centre)⁷ and have thus supported development here “*in so far as such removal will not cause significant harm to the purposes of the Cambridge Green Belt.*”⁸. CEG supports the Councils’ strategy⁹, including new settlements to accommodate need where development cannot be accommodated in or on the edge of Cambridge as the initial preference, consistent with para 2.20 of RD/MC/010. It ought also to be common ground that development on the edge of Cambridge is:

- more deliverable,
- provides a higher percentage of affordable housing,
- has shorter lead-in times, higher build out rates, and
- requires less publicly-funded new infrastructure to be sustainable.

Early development on the edge of Cambridge will, by virtue of delivering extra completions, support release of City Deal monies necessary to fill the acknowledged funding gap¹⁰ for new settlements.

2.2 CEG maintains that the Councils have not applied their own Development Strategy in a way that is justified or consistent with the NPPF. At the top level, problems arise because housing need is demonstrably greater than 33,000 new homes (evidence from CEG and other objectors - in substance unchallenged by the Council¹¹ – shows the need for at least 40,700 – 42,350 homes to support 44,000 new jobs). Para 84 of the NPPF requires that “*local authorities should take account of the need to promote sustainable patterns of development*” (our emphasis) whereas the Council’s assessment appears to have been skewed by absent, opaque or faulty evidence (notably on transport – Matter 7).

⁵ This document includes appendices critiquing the Councils’ Green Belt Review (Appendix 3), transport evidence (Appendix 4) and SA (Appendix 6)

⁶ We recognise the Inspectors’ note that the sessions are not an opportunity to submit new evidence and have sought to limit our technical evidence to the minimum necessary. However, this is the first opportunity that CEG has had to focus on site-specific matters (other than by way of example), and we have not yet had the opportunity to address these in the context of LDA’s re-write of its IGBR study (RD/MC/031) which was produced in March 2016 (post submission of our representations) and which alleged that CEG ‘misinterpreted’ the parameters in RD/MC/030. It is also the first time the Examination has considered the approach of the SAA (the original SA was addressed in Matter 1 in November 2014 but SAA issues have not subsequently been discussed).

⁷ RD-STRAT-040 Cambridge and South Cambridgeshire Sustainable Development Strategy (e.g. p16 Sustainable Development Sequence Matrix and RD-MC-060 Development Strategy Update, November 2015)

⁸ RD-SCG-090 – Statement of Common Ground between CEG and CCC

⁹ South Cambridgeshire Local Plan Policy S/6 and Cambridge City Local Plan paras 2.26 – 2.32 refer

¹⁰ RD/MC/010 para 2.19

¹¹ We say unchallenged because it is unarguable that a plan based on 44,000 jobs and 33,000 homes will encourage extra in-commuting from outside the two Council areas and thus “*could result in unsustainable commuting patterns*” (as per the PPG ID-02-018); and the Peter Brett Associates work on OAHN (RD/MC/040) explicitly (para 3.47) does not address the alignment of homes and employment (or properly deal with affordable housing needs).

- 2.3 But, most pertinent to this Matter, the touchstone is the Councils' contention that the Plans' strategy should maximise development on the edge of Cambridge up to the point that its benefits are outweighed by its adverse impacts, specifically harm to Green Belt. For land at Worts' Causeway, the Councils recognise it is a sustainable location for development but maintain that, beyond the GB1/GB2 allocations (and GB3 and 4), significant harm to the Green Belt purposes would arise that outweigh the benefits¹².
- 2.4 The Councils believe this 'tipping point' is defined by the artificial line (drawn without reference to topography or any physical features) that marks its proposed Green Belt boundary on GB1 and GB2. The NPPF (para 85) says that Green Belt boundaries must be defined to be consistent with the Plan's strategy for meeting needs (ie the development sequence), so if the Inspectors find that CEG's criticisms of the IGBR and how the Council has applied its assessment of alternatives are justified, and agree that one or both of CEG's omission sites¹³ would be deliverable or developable, it follows that, to be sound, **the Plan must be modified to extend the GB1 and GB2 allocations out to the point at which this tipping point is reached.**

3.0 What Modifications are necessary to ensure soundness?

- 3.1 CEG's original representations (2013) advocated a larger release for c.3,500-4,500 homes together with new schools and community/local facilities and additional employment development around Peterhouse Technology Park/ARM.¹⁴ Given the structural problems with the Council's evidence base on OAN and IGBR, CEG believes there is a strong case for this scale of development and for a further major revision to the Plans and their evidence base.
- 3.2 However, recognising the need to expedite adoption of Plans first published in 2013, CEG advocates, at minimum, that the Plans be modified to reflect Extended GB1/GB2 and a commitment to an early review¹⁵. This would:
- 1 Deliver up to 1,200 homes and be of sufficient scale to maintain a new primary school, additional new community/local facilities and some additional accessible green infrastructure and thus establish a sustainable new neighbourhood in a location close to areas of high job growth¹⁶ with high levels of travel to work by non-car modes;
 - 2 Reflect the Plans' Development Strategy;
 - 3 Sit within the parameters of the LDA IGRR¹⁷ (before LDA hastily re-wrote it);
 - 4 Define new Green Belt boundaries that are justified and consistent with NPPF paras 84/85.

4.0 How do the current Plans justify their approach?

- 4.1 The Councils rely on the Development Strategy Update¹⁸ and SAA¹⁹. Table 2 in RD/MC/060 summarises the SAA approach and a commentary (paras 4.42 – 4.76) tries to explain it. This

¹² See Statement of Common Ground between Cambridge City Council and CEG, February 2015 (RD-SCG-090)

¹³ We focus most of all in this Statement on the Omission Site put forward in CEG's representations to the Main Modifications and assessed (incorrectly) in the SAA as CCSC1005a on pages 494 - 503

¹⁴ Ref reps inc Synopsis and Vision Document

¹⁵ As discussed in Matter PM1B.4. An early review would be consistent with the PPG (ID: 12-004-20160519)

¹⁶ For example, the thousands of jobs being created in Cambridge, including at Astra Zeneca, Papworth Hospital relocation and ARM Holdings PLC (See CEG's Matters Statement SC7-17653)

¹⁷ RD/MC/030 (the original IGBR)

¹⁸ RD/MC/060

¹⁹ RD/MC/021

reiterates (para 4.75) that the Preferred Strategy is based on edge of Cambridge sites being released “*weighing in each case the sustainability merits of such locations with the significance of harm to the purposes of the Cambridge Green Belt*”. The SAA is where the inputs to this balancing exercise are set out. We know from the Council’s own approach that it considers GB1²⁰ and GB2²¹ to be acceptable (and sound), but Extended GB1/GB2²² to be unacceptable. This is made plain in the SAA RAG ratings as summarised in the table in Annex 1 (attached), which shows a number of differences between the scoring of the respective sites. CEG’s analysis²³ highlights where the scores are not correct, justified or objective for some important criteria, and which undermine the ‘soundness’ of how the Councils have scored the alternatives and thus applied their ‘tipping point’, either in terms of under-estimating the sustainability merits or over-estimating the significance of harm.

- 4.2 It is noteworthy that for some criteria, the notes recognise the benefits a larger scale of development could secure²⁴, but these are lost by the crude scoring system. Some SAA text also appears to have been generically cut and pasted from other sites.

5.0 Material Errors in the SAA and underlying evidence

Land - Agricultural Land Classification

- 5.1 The SAA assumes that development at Worts’ Causeway will result in the loss of Grade 1 and Grade 2 Agricultural land, with a minor loss on GB1 and GB2 but a significant loss (20 ha or more) across Extended GB1/GB2²⁵. In our Main Modification representations (Appendix 6) we challenged whether the difference between the alternatives warranted this score.
- 5.2 However, further analysis reveals the SAA is manifestly incorrect.
- 5.3 Site specific assessment (Annex 2) to establish the Agricultural Land Classification has confirmed the land is Grade 3b, and therefore not classified as “Best and Most Versatile Land” (BMVL). This is in part due to the shallow soil depths. The SAA is therefore wrong, and development in this location – whether on GB1 and GB2, or Extended GB1/GB2 – would not result in the loss of the (BMVL). It should therefore be scored ‘Green’.

Pollution

- 5.4 Under this criterion, the SAA scores GB1 and GB2, as allocated or extended, the same (Amber), equal to the Bourn Airfield new settlement²⁶. The SAA fails to recognise the obvious benefits associated with the high levels of active travel and public transport use on the edge of the City (recorded by the Census²⁷ and the Council’s own transport evidence²⁸), and the reduced emissions which would result relative to less accessible locations.

²⁰ Site Reference CC930 - Pages 367 – 377 of the SA Addendum

²¹ Site Reference CC929a - Pages 483 – 493 of the SA Addendum

²² Site Reference CCSC1005a - Pages 494 – 503 of the SA Addendum

²³ Set out in Appendix 6 of the CEG Representations to the Main Modifications dated 25th January 2016 and summarised in Section 5.0 of this Matters Statement

²⁴ See for example comments in relation to flood risk and open space in CCSC1005a site assessment proforma (RD-MC-021, p494 – 503)

²⁵ Agricultural Land is identified as the first issue describing Edge of Cambridge sites in Table 2 in RD/MC/060 and agricultural land is identified as a key comparator at the bottom of page 35

²⁶ SAA Site Reference SC057 & 238 on pages 605-615

²⁷ See Page 9 of CEG Matter 7 Statement (Ref: M7 - 5423 – 17653) which shows car-based journeys to work at 34% in Queen Edith’s Ward compared to 75% in Bourn Ward. Active Travel to work is 45% and 7% respectively.

²⁸ RD/MC/070

Landscape, Townscape and Cultural Heritage - Landscape

- 5.5 The SAA concludes there will be no impact ('green') from the development of the GB1/GB2 allocations, but a negative impact incapable of mitigation if the extended GB1 and GB2 area is released, scoring this (inconsistently) as 'amber/red'.
- 5.6 The SAA makes reference to the Update IGBR (RD/MC/031) and LDA's parameters which state that: "... *limited development on the relatively flat ground in the western parts of the sector, in both sub areas 11.2 and 11.2, in which GB1 and GB2 are located, could be undertaken without significant long-term harm to Green Belt purposes subject to the early establishment of a generous landscape edge to create an appropriate buffer and distinctive city edge between the development and the Cambridge Green Belt.*"
- 5.7 The SAA goes on to state that development beyond GB1/GB2 would have a "*severe negative impact on the purposes of Green Belt*". This is despite acknowledging that CEG propose a larger site that extends GB1 and GB2 to the east, and that such development "*would be limited to the flatter ground to the east and avoid the sloping ground leading to the foothills of the Gog Magog Hills.*"
- 5.8 CEG's review of the IGBR evidence (Annex 3) demonstrates that development based upon an interpretation of LDA original IGBR²⁹ keeps the slopes of Limekiln Hill free from development, retaining the open rural foreground and views of the historic skyline in key views³⁰. Development of Extended GB1 / GB2 would provide an improved soft green edge to southeast Cambridge and reinforce existing hedgerows along Limekiln Road.
- 5.9 It is impossible to understand how the limited difference between the two development options may result in a "*severe negative impact*" on the purposes of the landscape and Green Belt in this location, when (as the Councils accept) development of Sites GB1/GB2 would not.

Landscape, Townscape and Cultural Heritage - Townscape

- 5.10 The SAA concludes there will be no impact on the townscape from the development of the GB1/GB2 allocations, but a significant negative impact with no satisfactory mitigation measures possible if Extended GB1/ GB2 is released, scoring this 'red'. It suggests "*There are open views of the site and the City from the west and south*" and that "*Existing clear views to the historic and collegiate core of the City would be severely negatively impacted if development occurred on the site.*" Strangely, identical text appears in respect of land South and North of Barton Road/Grange Farm (Broad Locations 1 and 2)³¹. For that site, those comments are understandable, but bear no relation to the visual or geographical relationship between the land at Extended GB1/GB2 and the historic core. We urge that a site view is essential to understand the falsity of the Councils' position.
- 5.11 In Key Elevated Views to the south and east of Cambridge (as identified by LDA within the 2015 IGBR), development of Extended GB1 /GB2 would:
- preserve the rural foreground;
 - retain views of the historic skyline;
 - provide a soft green edge to the city; and

²⁹ RD/MC/030

³⁰ As illustrated by the comparative Photomontages of Sites GB1/GB2 and Extended GB1/GB2 from LDA Key Views – Annex 3, pages 11-14

³¹ See RD-MC-021 p221, p233 and p519

- preserve the rural backdrop to Cambridge.

5.12 These are all key attributes of these views that LDA identify. This is clearly demonstrated by photomontages at Annex 3, which also illustrate the extremely limited difference between development of the current GB1/GB2 allocations and Extended GB1/ GB2³².

Landscape, Townscape and Cultural Heritage - Green Belt

5.13 The SAA indicates that while GB1/GB2 would have a negative impact on Green Belt purposes (scoring ‘amber’), a wider release would score ‘dark red’³³. While the assessment of GB1/GB2 includes the consideration and scoring of the site against each Green Belt purpose before presenting an overall score, no such detail is presented for Extended GB1/GB2. This inconsistency does nothing to explain the SAA suggestion that there is a sudden and significant difference in impacts at an arbitrary mid-point across two fields which demonstrate no variation in character. This conclusion is illogical and unjustified. As earlier evidence and submissions have demonstrated³⁴, the Council’s proposed boundary is not justified, effective or defensible.

5.14 Our analysis (Annex 3) assesses the land at Worts Causeway against LDA’s own criteria³⁵, using measurable parameters. It demonstrates beyond doubt that development of Extended GB1/GB2 would not result in harm to the Green Belt and would comply with LDA’s own parameters, including those cited within the SAA. It is clear from the latest IGBR/SAA³⁶ that there is no clear and reasoned justification for a Green Belt boundary half way along Worts’ Causeway. It is not consistent with national policy³⁷ and the creation of additional ‘left over land’ in this location will do nothing to serve Green Belt purposes. It will only represent a failure by the Councils to apply their own development sequence and accommodate development in what they themselves recognise is a sustainable location.

Economy - Education Capacity and Distance: Primary School

5.15 The SAA ‘amber’ scoring of Extended GB1/GB2 for Education Capacity fails to allow for the provision of a new primary school that would be possible on Extended GB1/GB2. There is an inconsistency in the scoring for primary school capacity and Distance:Primary School between the GB1 and GB2 options and Extended GB1/GB2 which suggests some confusion on the Councils’ part over school capacity, and what benefit or not would exist from a new school being provided. GB2 is scored ‘Green’ under Distance:Primary School because the “*site is beyond 800m from the nearest primary school but is large enough to provide its own facilities*” and yet there is no suggestion what facilities it means and none are assumed in Policy 26 which allocates the sites³⁸. This error means GB2 scores the same as Extended GB1/GB2 (CCSC1005a), which is wrong.

³² Photomontages of Sites GB1/GB2 and Extended GB1/GB2 from LDA Key Views – Annex 3, pages 11-14

³³ ‘Dark Red’ equates to very high and high impacts on Green Belt purposes/very significant negative impacts.

³⁴ Including CEG’s original representations to the Submission Draft Plan, as well as the CEG Representations to Proposed Modification to the Cambridge City and South Cambridgeshire Local Plans, January 2016 - Appendix 3 Technical Paper: Green Belt Review, Part 2 – Implications for Green Belt Release at Southeast Cambridge, paragraphs 3.1-3.8, page 13

³⁵ CEG maintains criticisms it made of LDA’s approach in PM2 (PM2-17653) but for the purposes of this analysis applies LDA’s approach to show even on the Council’s terms there is no reason to discount Extended GB1/GB2.

³⁶ Cambridge IGBR Study (November 2015) Supplement RD/MC/031, Item 3 (paragraph 6.14.6 / bullets, pages 10 – 12)

³⁷ RD/MC/031 or Pages 494-503 of the SAA.

³⁸ NPPF Paragraph 85, 6th bullet

³⁸ A new school and the land-take would be incompatible with achieving c.200 units on the site.

Transport

- 5.16 The extent of development at Cambridge South East and the Councils' assessment of the acceptability of Extended GB1/GB2 is based on incorrect and unsound transport modelling³⁹. The edge of Cambridge is highly sustainable in transport terms, and development in South East Cambridge will reduce trip lengths and encourage active travel choices. Unfortunately, the structure of the SAA in relation to sustainable transport does not score the inevitable positive outcomes effectively, resulting in illogical SA outcomes⁴⁰. For example, the STS score is based on transport *inputs* (distance, frequency, time measures) rather than *outcomes* (the travel choices/modal split which result). Two of the four STS criteria are rightly City Centre focused, and RD/MC/070⁴¹ shows 70% car and only 6% active modes for Bourn (Option 3), compared to 32% car and 62% active for Option 6 (SER) i.e. Cambridge SE. This split does not support the SAA conclusion that the STS scoring for Bourn and Extended GB1/GB2 should be virtually the same. Further, no allowance has been made for mitigation/public transport committed within Extended GB1/GB2 whereas Bourn STS scores do include future mitigation measures⁴².
- 5.17 Further, the ability of an extended GB 1 and 2 allocation to delivery accessible new homes and facilities from existing infrastructure is not recognised within the evidence base and plans. When compared with new settlements, significant infrastructure cost savings would be achieved and sustainable transport links more quickly established⁴³. Development in this location would make use of infrastructure to be delivered over the period 2015 to 2020⁴⁴ and deliver additional sustainable economic growth which will help to secure City Deal Tranche 2 funding - which the Plan relies upon to support further housing and economic development.

Failure to address affordable housing benefits

- 5.18 An omission from the Council's assessment is consideration that edge-of-Cambridge sites (including Extended GB1/GB2) will deliver more affordable housing than will new settlement options. Table 5.1 (page 49) of the SAA scores all non-Cambridge urban area options as '+' when it is clear that new settlements are delivering affordable housing at levels below the 40% required by the Local Plan⁴⁵. This is not mentioned at all in the SAA. It must materially affect the balance that the Councils claim to have carried out.

³⁹ The updated CSRM modelling includes incorrect and unsound input assumptions for Cambridge SE which are also relevant to Extended GB1/GB2. These point are covered in the 'Note for the Inspectors on Principal Issues relating to Transport Modelling, May 2017' which we anticipate will be discussed at the reconvened Matter 7 – Transport Session.

⁴⁰ For example, the SAA's Sustainable Transport Scores (STS) give Bourn Airfield a score of 17 (Green) (see RD-MC-021 p613) and Extended GB1/GB2 a score of 18 when totalled (also Green, although incorrectly recorded as 20 and Dark Green in the table, see RD-MC-021 p502).

⁴¹ Figure 5-11 on p54 of RD/MC/070

⁴² Measures/mitigation which, incidentally, are unsupported/not fully funded

⁴³ In relation to cycling for example, the SAA fails to recognise the benefits of a comprehensive approach to development and the off carriageway cycle links which could be achieved along Worts' Causeway, although the SAA does recognise in general terms that the extended GB1 and 2 option would deliver significant improvements to public transport, cycling and walking facilities (see RD-MC-021 p501ff).

⁴⁴ A plan showing the location and estimated delivery timetable of infrastructure funded through City Deal⁴⁴ in the context of the Extended GB/ GB2 is attached at Annex 4

⁴⁵ A point made in CEG's Representations to the Main Modifications – see pages 2, 18, 24, and page 5 of Appendix 6 to those representation. Subsequently, the draft s.106 Heads of Terms for the approval of the planning application (9S/2903/14/OL) for 2,350 dwellings at Cambourne West confirms only 30% affordable housing provision (at 50:50 tenure split) compared to 40% required by policy. These are available as Appendix 2 to the Officer's report at <http://scams.moderngov.co.uk/ieListDocuments.aspx?Mid=6762&x=1>

6.0 Conclusion on Soundness and the Need for Extended Allocations at Cambridge South East

- 6.1 The findings of the Councils' SAA do not support the Councils' own implementation of their Sustainable Development Sequence, or the 'tipping point' concluded upon by the Councils in regarding GB1/GB2 as acceptable, and CEG's Extended GB1/GB2 as not acceptable.
- 6.2 The outcome is Plans with a strategy that is demonstrably not "*the most appropriate strategy, when considered against the reasonable alternatives*", and Green Belt boundaries that are not consistent with NPPF paras 84 and 85. Allocation of Extended GB1/GB2 is a reasonable alternative which, when properly and objectively considered, is justified, is sustainable development, and would have Green Belt boundaries consistent with national policy.

Annex 1 – Comparison Table of SAA Scores

Criteria	GB1 (CC930)	GB2 (CC929)	Amended GB2 (CC929A)	Extended GB1 & GB2 (CCSC1005A)
LAND				
PDL	Red	Red	Red	Red
Agricultural Land	Yellow	Yellow	Yellow	Red
Minerals	Green	Green	Green	Green
POLLUTION				
Air Quality	Yellow	Yellow	Yellow	Yellow
AQMA	Green	Green	Green	Green
Pollution	Yellow	Yellow	Yellow	Yellow
Contamination	Green	Green	Green	Green
Water	Green	Green	Green	Green
BIODIVERSITY				
Designated Sites	Yellow	Yellow	Yellow	Yellow
Biodiversity	Yellow	Green	Green	Yellow
TPO	Green	Green	Green	Yellow
Green Infrastructure	Yellow	Green	Green	Green
LANDSCAPE, TOWNSCAPE AND CULTURAL HERITAGE				
Landscape	Green	Green	Green	Red
Townscape	Green	Green	Green	Red
Green Belt	Yellow	Yellow	Yellow	Dark Red
Heritage	Yellow	Yellow	Yellow	Yellow
CLIMATE CHANGE				
Renewables	Yellow	Yellow	Yellow	Yellow
Flood Risk	Yellow	Yellow	Yellow	Yellow
HUMAN HEALTH AND WELL BEING				
Open Space	Green	Green	Green	Green
Distance: Outdoor Sports Facilities	Green	Green	Green	Green
Distance: Play Facilities	Green	Yellow	Red	Green
Gypsy and Traveller	Yellow	Yellow	Yellow	Yellow
Distance: District or Local Centre	Yellow	Red	Red	Green
Distance: City Centre	Red	Red	Red	Red
Distance: GP Service	Yellow	Red	Red	Green
Key Local Facilities	Yellow	Yellow	Yellow	Yellow
Community Facilities	Green	Green	Green	Green
Integration with Existing Communities	Green	Green	Green	Green
ECONOMY				
Deprivation (Cambridge)	Yellow	Yellow	Yellow	Yellow
Shopping	Green	Green	Green	Green
Employment - Accessibility	Green	Green	Green	Green
Employment - Land	Green	Green	Green	Green
Utilities	Yellow	Yellow	Yellow	Yellow
Education Capacity	Yellow	Yellow	Yellow	Yellow
Distance: Primary School	Red	Red	Green	Green
Distance: Secondary School	Green	Yellow	Yellow	Green
TRANSPORT				
Cycle Routes	Red	Yellow	Yellow	Yellow
HQPT	Green	Red	Red	Yellow
Sustainable Transport Score (SCDC)	Green	Green	Green	Green
Distance: Bus Stop/Rail Station	Green	Green	Green	Green
Frequency of Public Transport	Green	Green	Green	Green
Public Transport Journey Time to City Centre	Green	Green	Green	Green
Distance for Cycling to City Centre	Green	Green	Green	Green
Distance: Railway Station	Red	Red	Red	Red
Access	Yellow	Yellow	Yellow	Yellow
Non-Car Facilities	Yellow	Yellow	Yellow	Green



Annex 2 – Agricultural Land Classification Assessment

Land at Netherhall Farm, Cambridge

1665_R10_Agricultural Land Classification

1.0 Introduction

- 1.1. A detailed Agricultural Land Classification (ALC) assessment has been made of Land at Netherhall Farm, Cambridge. The location and extent of the Study Area are shown on **Plan 1: Netherhall Farm - Agricultural Land Classification (drawing 1665/P132)**. ALC survey work was carried out in October 2015.

Study Area Description

- 1.2. The Study Area lies on the south eastern edge of Cambridge, north of Wort's Causeway and west of Limekiln Road. It comprises a single large arable field, with small areas of old farm buildings (currently being redeveloped), paddock and residential land along the western edge.
- 1.3. The Study Area sits within Cambridge City Council's planning jurisdiction. It borders on, but does not overlap with, South Cambridge.

2.0 Planning Policy

- 2.1. The protection from non-agricultural development of the Best and Most Versatile (BMV) agricultural land is a long held objective in national planning policy guidance, with a relatively consistent approach to this issue having been adopted within various iterations of relevant planning guidance, the most recent of which comprises the National Planning Policy Framework (NPPF) of March 2012, outlined below.

National Planning Policy Framework, 2012¹

- 2.2. Paragraph 112 of the NPPF states:

"... Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality..."

- 2.3. The glossary of the NPPF gives the following definition:

"... Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification..."

- 2.4. The Cambridge Local Plan² was adopted in July 2006, however it does not include its own policy on the conservation of the best and most versatile agricultural land.

3.0 Assessment Methodology

- 3.1. As per the NPPF the BMV land is that falling within Grades 1, 2 and 3a of the MAFF Agricultural Land Classification (ALC) of England and Wales, published October 1988³. The MAFF ALC system of grading land quality for use in land use planning purposes divides

¹ National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² Cambridge City Local Plan <https://www.cambridge.gov.uk/local-plan-2006>

³ ALC Guidelines <http://archive.defra.gov.uk/foodfarm/landmanage/land-use/documents/alc-guidelines-1988.pdf>



farmland into five grades according to the degree of limitation imposed upon land use by the inherent physical characteristics of climate, site and soils. Grade 1 land is of an excellent quality, whilst Grade 5 land has very severe limitations for agricultural use.

3.2. ALC guidelines and criteria require that the following factors be investigated:

- Climate: Average Annual Rainfall (AAR) and Accumulated Temperature above 0°C between January and June (AT0);
- Site: Gradient, Micro Relief and Flooding;
- Soils: Texture, Structure, Depth, Stoniness, and Chemical Toxicity; and
- Interactive Factors: Soil Wetness, Soil Droughtiness and Liability to Erosion.

3.3. The extent of the Study Area is shown on **Plan 1**. A detailed Agricultural Land Classification (ALC) survey was carried out by a soil scientist (Daniel Baird) in October 2015. The survey and assessment was undertaken in accordance with the guidance given in Natural England's TIN049 - Agricultural Land Classification: protecting the best and most versatile agricultural land⁴.

Climate

3.4. Climate data for ALC are provided for 5km intersections of the National Grid by the Meteorological Office, in collaboration with the National Soil Resources Institute. The data from these points can be interpolated providing climate data for specific sites. Interpolated data for the Study Area are given in **Table 3.1** below:

Reference Point	TL 476 551
Altitude (m)	20
Average Annual Rainfall AAR (mm)	569
Accumulated Temperature AT0 (day degrees)	1447
Moisture Deficit for wheat (mm)	121
Moisture Deficit for potatoes (mm)	117
Field Capacity Duration (days)	96

Table 3.1: Climate Data for Land at Netherhall Farm, Cambridge

3.5. The main parameters used in the assessment of an overall climatic limitation are AAR as a measure of overall wetness, and AT0 as a measure of the warmth of the site in the growing season.

3.6. Climate does not impose an overall limitation on ALC grade at this site. Climate does however have an important influence on the interactive limitations, the relatively high rainfall affecting soil wetness and soil droughtiness.

The Study Area

3.7. The extent of the Study Area is shown on **Plan 1**. The land is predominantly level with gentle slopes up to a low hill top in the northeast corner. Gradient and topography do not limit overall ALC grade at this site.

3.8. No water courses bound the Study Area and there are no significant sources of runoff that could discharge onto the area. The Study Area has no risk of flood that could limit ALC grade.

⁴ <http://publications.naturalengland.org.uk/publication/35012>



Soils and Parent Materials

- 3.9. The Geology of Britain Viewer⁵ shows the Study Area underlain by a solid geology of chalk, primarily the Zag Chalk Formation with a small inclusion of Holywell Nodular Chalk Formation in the north east corner. There is no overlaying drift formation shown. Detailed survey of the Study Area found soil profiles consistent with this parent material, with the chalk bedrock normally apparent within half a meter of the surface. In some locations the soil depth does not exceed 30cm and so is limited to Grade 3b by soil depth.
- 3.10. Soils have a sandy clay loam to sandy loam texture with common stones, and an abrupt boundary to the chalk bedrock below. At the time of survey, several archaeological trial trenches were active on the western half of the Study Area, with the plough layer stripped and set aside. These open shallow trenches showed the shallow nature of the soil found at this site.

Interactive Factors

- 3.11. Soils within the Study Area are well drained (Wetness Class I) and there is not soil wetness limitation. The area has a reasonably low rainfall and soil profiles that cannot retain a large volume of plant available water. As a result, the agricultural land within the Study Area is limited to ALC Grade 3b by soil droughtiness.

4.0 Agricultural Land Classification of Land at Netherhall Farm, Cambridge

- 4.1. Agricultural land within the Study Area has been classed as ALC Grade 3b. Existing residential development and old farm buildings have been mapped as Non Agricultural land. The distribution of ALC Grades can be seen on **Plan 1**, with areas given in the table below.

ALC Grade	Area (ha)	%
3b	25.8	94.9
Non Agricultural	1.4	5.1
Total	27.2	100.0

Table 4.1: ALC Grade Distribution, Land at Netherhall Farm, Cambridge

- 4.2. All agricultural land within the Study Area is classed as ALC Grade 3b. Soil profiles are shallow, with 30 to 45cm of soil over chalk. Isolated occurrences of deeper soils (up to 80cm) are found but they do not comprise an identifiable contiguous area at the 1:10,000 scale of survey. The open archaeological trenches also demonstrated the presence of occasional abrupt pockets of subsoil within the surrounding chalk solid geology.
- 4.3. Soil droughtiness is the primary limitation restricting the land to ALC Grade 3b, the shallow sandy loam or sandy clay loam soil with common stones only being able to retain a limited volume of plant available water in a low rainfall area. In places the land is also limited to Grade 3b by soil depth, the shallow soil limiting a land manager's options for crop selection and cultivation.

5.0 Summary

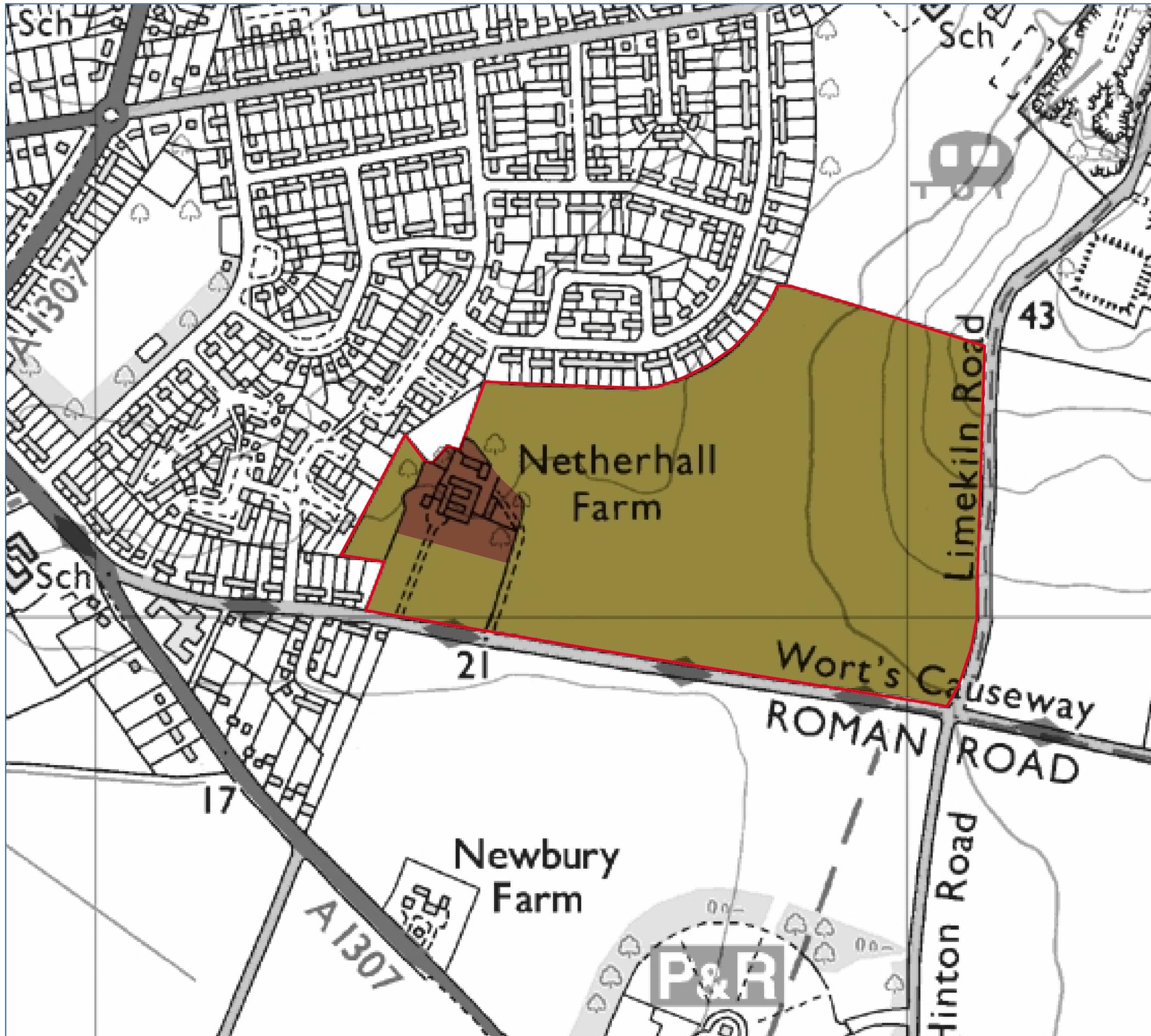
- 5.1 A detailed ALC survey of the Land at Netherhall Farm, Cambridge has found all agricultural land within the Study Area to be ALC Grade 3b. The shallow soils over chalk in a relatively dry part of England are limited to grade by soil droughtiness.

⁵ British Geological Society geology viewer. <http://www.bgs.ac.uk/discoveringGeology/geologyOfBritain/viewer.html>



- 5.2 ALC Grade 3b land is not part of the national resource of best and most versatile agricultural land. Therefore, NPPF policy to conserve the best and most versatile agricultural land is not applicable to the area considered by this survey.
-

Plan 1: Netherhall Farm - Agricultural Land Classification (drawing 1665/P132)



- Study Area
- ALC Grade 3b
- Non Agricultural



Project	Southeast Cambridge
Drawing Title	Plan 1: Netherhall Farm: Agricultural Land Classification
Scale	As Shown (Approximate)
Drawing No.	1665/P132
Date	December 2015
Checked	RG/BG



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**Annex 3 – Green Belt Release at South East Cambridge – A Review of the
Cambridge Local Plan Evidence Base and Allocation Sites**

Green Belt Release at Southeast Cambridge

A Review of the Cambridge Local Plan Evidence Base and Allocation Sites

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-	Draft	MF 24 May 2017	RH 24 May 2017
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Introduction

1. CEG has consistently argued that the Green Belt evidence base is flawed¹. Notwithstanding this position, within this document we demonstrate how the extended GB1/GB2 release promoted by CEG can be accommodated without harm to the Green Belt qualities identified by the Councils.

- Demonstrate that the release of the Extended GB1/2 Sites would comply with the LDA parameters, despite the flaws in the methodology employed by the LDA Study, and would have no greater material impact on Green Belt purposes than the proposed allocations at Sites GB1/2.

The four key issues are:

1 – Development of the Extended GB1 and GB2 Sites would be no further from the historic core than existing boundaries to the east at Cherry Hinton

*[LDA Criteria 1 - A Large historic core relative to the size of the city as a whole]
[LDA Criteria 4 - A city of human scale easily crossed by foot and bicycle]*

2 – Development of the Extended GB1 and GB2 Sites would protect key views towards Cambridge and retain the open slopes of Limekiln Hill and the Gog Magog Hills

[LDA Criteria 7 – Key Views of Cambridge from the surrounding landscape]

3 – Development of the Extended GB1 and GB2 Sites would be contained within existing urban gateways on the approach to Cambridge

[Criteria 3 - Short and / or characteristic approaches to the historic core from the edge of the city]

4 – Extended Sites GB1 and GB2 are defined by existing permanent boundaries which may be strengthened through their release from the Green Belt

2. The Councils have relied on the findings of the following studies:

- *Cambridge Inner Green Belt Boundary Study, November 2015 (RD/MC/030) – ‘The 2015 Study’; and*
- *Cambridge Inner Green Belt Study (November 2015) Supplement, March 2016, LDA [RD/MC/031] – ‘The 2016 Supplement’*

3. The studies were prepared following the Local Plan Inspectors raising concerns regarding the methodology employed by the former 2012 Cambridge Inner Green Belt Boundary Study that supported the July 2013 Local Plan Submission.

4. The two LDA studies have identified a number of assessment criteria, based on ‘qualities’ of the Green Belt and provide a set of parameters against which the Councils have sought to justify the extent of proposed allocations at Sites GB1 and GB2.

5. Building on the previous Representations, Matters Statements and Appearances made on behalf of CEG, this document has been prepared to:

- Clearly demonstrate that the LDA parameters used to support the extent of land for release at sites GB1/2 are NOT robust and do NOT provide an accurate or appropriate basis upon which to define a new Green Belt boundary to the southeast of Cambridge; and

6. Consideration is also given to the requirement for the definition of permanent, recognisable and clear boundaries when releasing land from the Green Belt as set-out in the NPPF, and how the release of the Extended GB1/2 Sites may achieve this in a more appropriate manner than delivered by the existing allocations.

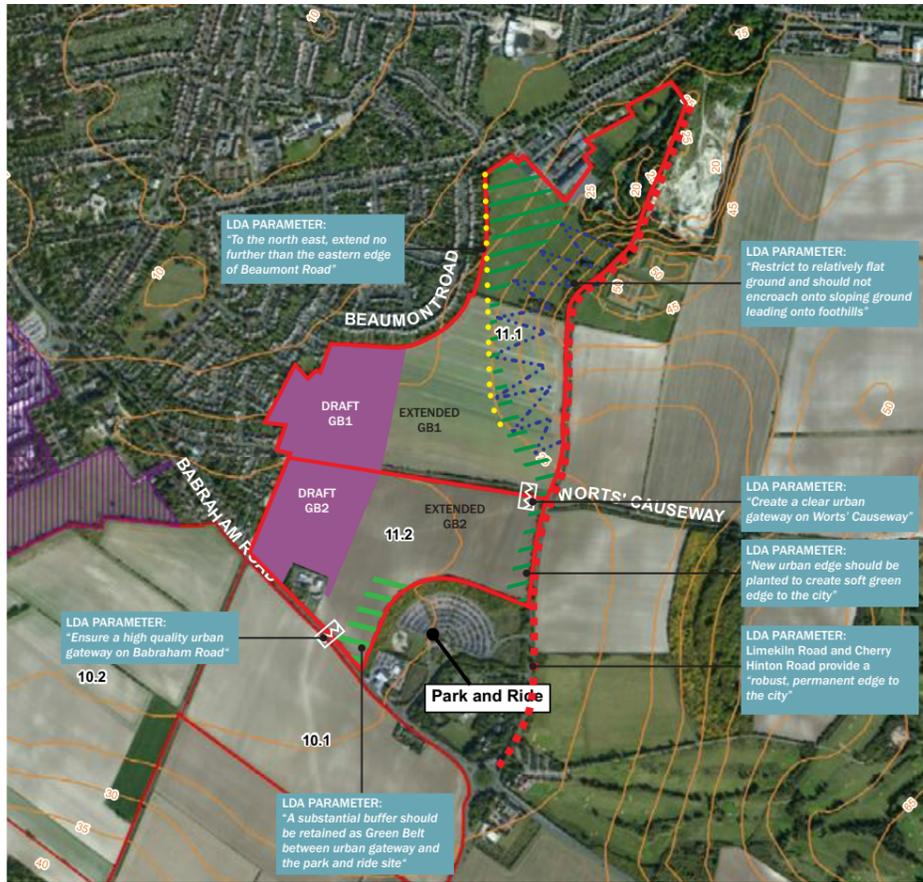
7. In order to demonstrate that the release of the extended GB1/2 sites would not harm the function or purposes of the Cambridge Green Belt, this document highlights four “key points” and considers them against LDA’s assessment and parameters through a comparative assessment of the Councils proposed allocations at Sites GB1/2 and the Extended GB1/2 Sites being promoted by CEG.

8. Extensive work has been undertaken to establish the four critical points. Although Tyler Grange considers that other anomalies in the process exist, this report seeks to narrow the issues before the examination.

9. The masterplan for the Extended GB1/2 Sites is based upon CEG’s interpretation of the LDA parameters, as illustrated on Figure 3.1 within the January 2016 Representations to the Proposed Modifications Local Plan.

10. Copies of the Illustrative Masterplans and CEG’s objective interpretation of the LDA parameters are included overleaf.

¹
• Cambridge South East: Synopsis of Representations, September 2013
• Cambridge South East: Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016, Appendix 3: Technical Paper: Green Belt Review (Report 1665_R11a).
• Matters Statement to Joint Local Plans: Matter PM2- Green Belt Methodology, May 2016 (report 1665_R12c)



Interpretation of LDA Parameters for Green Belt Release
 Source: Figure 3.1: CEG Representations to Proposed Modifications Local Plan:
 Appendix 7 – Development Prospectus, 25 January 2016



Sites GB1 and GB2 Illustrative Masterplan
 Source: Initial Concepts: Masterplan Development GB1 and GB2, 25 January 2016



Extended GB1 and GB2 Sites Illustrative Masterplan
 Source: Figure 3.2: CEG Representations to Proposed Modifications Local Plan:
 Appendix 7 – Development Prospectus, 25 January 2016

Key Point 1:

Development of the Extended GB1 and GB2 Sites would be no further from the historic core than existing boundaries to the east at Cherry Hinton

LDA Criteria 1 –A large historic core relative to the size of the city as a whole

Assessment Criteria / Importance of this Sector to Green Belt Purposes.	Implications of Green Belt Release for Development.	Parameters for Green Belt Release.
<p><i>This sector of Green Belt is relatively distant from the historic core, which is 3.18 km north-west... Limekiln Road forms the eastern extent of the sector, with the A1307 Babraham Road the southwest boundary, and with the Babraham Road Park and Ride adjoining the south of the sector.</i></p> <p><i>Despite the presence of substantial suburban housing areas south east of the historic core, the scale of the historic core relative to the overall city still currently remains such that Cambridge retains its historic character.</i></p> <p><i>The extent of development on this side of the city gives an impression of urban sprawl.</i></p> <p><i>This sector plays an important role in restricting further growth of the city in this direction.</i></p> <p><i>Significant expansion of development in this sector could start to threaten Cambridge's identity as a city dominated by the historic core</i></p>	<p><i>The new Green Belt boundary would be no further from the historic core than existing boundaries to the east at Chery Hinton. A permanent, well-designed edge to the city would be created. Thus, the increase in urban sprawl would be permanently limited and would not affect perceptions of the compact nature of the city.</i></p>	<p><i>The new Green Belt boundary would be no further from the historic core than existing boundaries to the east of Cherry Hinton. A permanent, well-designed edge to the city would be created. Thus, the increase in urban sprwal would be permanently limited and would not affect perceptions of the compact nature of the city.</i></p>

Tyler Grange Analysis

Critique of Approach

- LDA's analysis does not provide a measurable comparison with the existing limits of Cherry Hinton.
- The assessment does not allow for an objective, measurable analysis to determine how the land performs this function.
- No recognition is given by the development parameters to the presence of urban fringe development at the Babraham Road Park & Ride, Beechwood School, houses, business units and car dealership to the south-eastern edge of Sector 11 (Sub-area 11.2). This type of development is identified by LDA as forming an "urban gateway" to the east of Cambridge on Newmarket Road (A1303). (see analysis on Plan at Appendix 4 of CEG Matter PM2, Issue PM2.1 Statement)
- The parameters / extents of sites GB1 and GB2 are not justified by the assessment.

Measure

- The LDA parameters seek to contain development within the extents of Cherry Hinton.
- Distance of sites from Historic Core and relationship to existing extent of development at southeast Cambridge (Inc. Cherry Hinton as defined by LDA parameter).
- Difference between distance of GB1 & 2 and Omission Site from historic core.

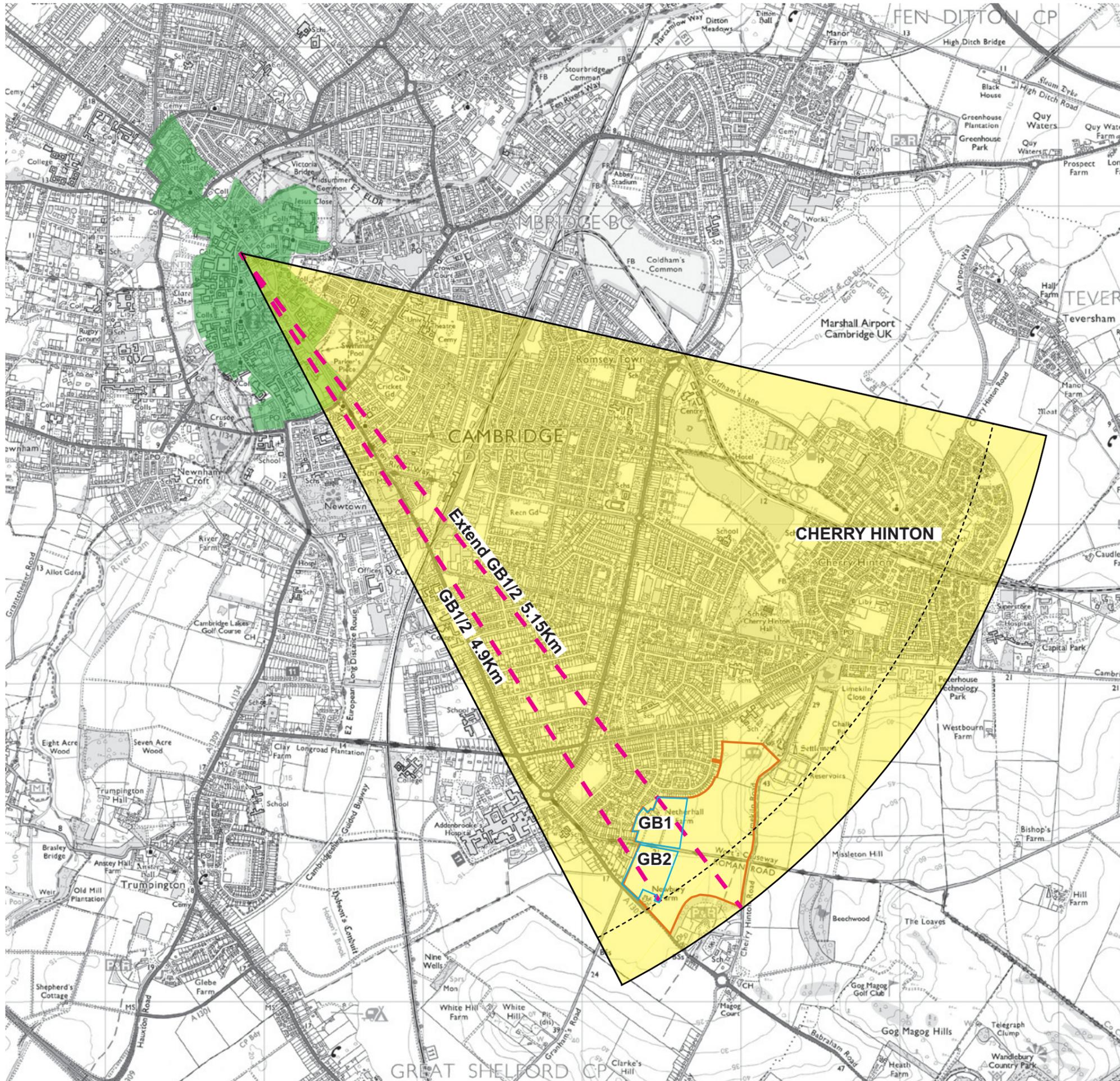
Comparative Assessment

<p>Performance of GB1 / GB2</p> <p>Sites GB1 and GB2 are contained within the extents of development along Fulbourn / Cambridge Road and at Cherry Hinton to the east.</p> <p>The distance between the centre of Cambridge and the outer edge of Site GB2 is 4.9km.</p> <p>Development of these parcels would result in a new built edge between Cherry Hinton Road and existing urban fringe development to the southeast.</p>
<p>Performance of Extended GB1 / GB2</p> <p>The whole of Sector 11 falls within the extents of Cherry Hinton and development along Fulborn Road.</p> <p>The distance between the centre of Cambridge and the outer edge of the Extended GB1/2 Sites is 5.15km.</p> <p>The Extended GB1 /2 illustrative masterplan parameters fall within the extents of Sector 11 and the boundaries at Limekiln Road and Cherry Hinton Road.</p>
<p>Difference</p> <p>Difference between the outermost edges of Sites GB1/2 and Extended GB1/2 = 250m</p> <p>This equates to a 4.9 % difference overall.</p> <p>The plan overleaf demonstrates how this relates to the overall scale and extent of development to southeast Cambridge.</p>

Summary

- Development of the Extended GB1 / GB2 site would be contained within the extent of existing development at Cherry Hinton and along Fulbourn / Cambridge Road to the north east. This accords with the LDA parameters.
- Development would also be contained within the extents of existing development on Babraham Road (park & ride, houses, school and retail / business units).
- Development across the whole of sector 11 would be contained within the extents of development at Cherry Hinton.
- Existing roads (Cherry Hinton Road and Limekiln Road) and development at the park & ride site would contain the extent of development. Existing development to the east and southeast of sector 11 defines the extent of existing development on Babraham Road.

Distance from Historic Core and Relationship to Built Edge



- Sites GB1 and GB2
- Extended GB1 and GB2 Sites
- Historic Core
(as defined by the Cambridge Inner Green Belt Study, November 2015, LDA Desin (RD/MC/030))
- Distance of outer edge of GB1/2 sites from the Historic Core in relations to the existing built edge of Cherry Hinton
- Distance of outer edge of Extended GB1/2 sites from the Historic Core in relation to the existing built edge of Cherry Hinton

Key Point 1:

Development of the Extended GB1 and GB2 Sites would be no further from the historic core than existing boundaries to the east at Cherry Hinton

LDA Criteria 4 – A city of human scale easily crossed by foot and bicycle

Assessment Criteria / Importance of this Sector to Green Belt Purposes.	Implications of Green Belt Release for Development.	Parameters for Green Belt Release.
<p><i>This quality has already been eroded to a certain extent to the southeast of Cambridge, due to the extent of suburban development already present.</i></p> <p><i>Consequently the compactness of the city has been reduced and this sector is relatively far from the historic core for people to walk or cycle into the centre.</i></p> <p><i>However, well used routes are apparent including the cycle lane along Babraham Road / Hills Road to the west.</i></p>	<p><i>The new Green Belt boundary would be no further from the historic core than existing boundaries to the east at Chery Hinton. A permanent, well-designed edge to the city would be created. Thus, the increase in urban sprawl would be permanently limited and would not affect perceptions of th ecompact nature of the city.</i></p>	<p>There are no parameters for Sector 11 that clearly relate to this criteria / quality. However, in relation to sprawl, LDA state that the parameters serve to limit sprawl through the development being no further from the historic core than existing boundaries to the east of Cherry Hinton.</p>

Tyler Grange Analysis

Critique of Approach

A thorough analysis of this criteria is included within the Green Belt Technical Paper that forms Appendix 3 to CEG's representations to the Proposed Modifications Local Plans, January 2016. (paragraphs 2.28 – 2.48, pages 7 – 10)
This has found that:

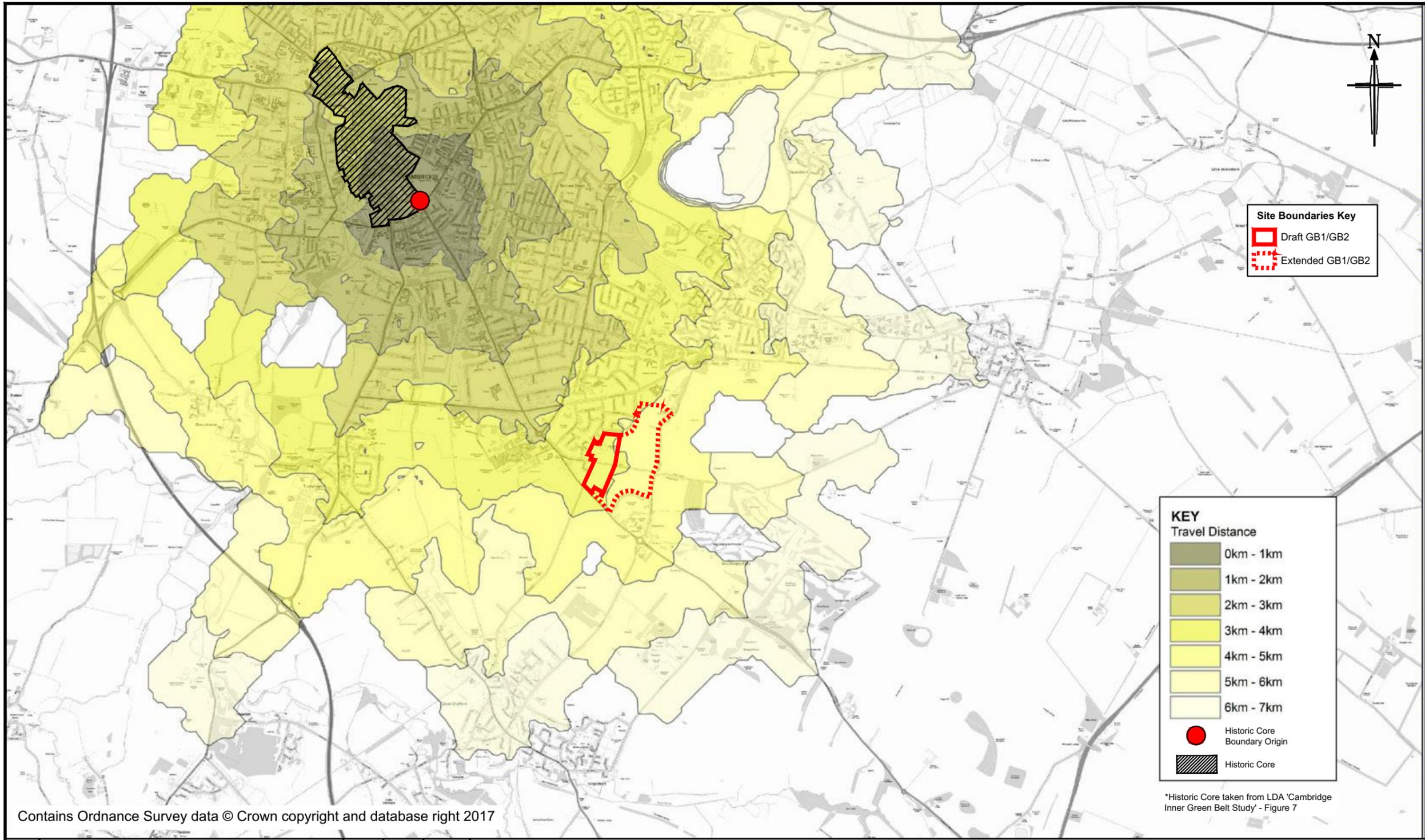
- The quality does not relate to checking unrestricted sprawl or defining the setting or character of Cambridge. It is not a Green Belt purpose.
- No details of how or which routes this distance was measured.
- No mention of distance or accessibility for crossing the city by foot.
- Does not consider "crossing of city" but rather access to the city core from the suburbs.
- Human scale is not defined and is not readily measurable or quantifiable
- Sector 11 lies within a catchment that the Council assess as generating high level of travel to work by active modes. Therefore, quality has not been eroded in relation to access by foot or cycle.

Measure

- Distance and travel time for pedestrian and cycle routes from the outer edges of GB1 and GB2 and Extended GB1/2 sites to the outer edge of the historic core.
- Express differences in meters and travel time for each mode of transport.
- Distances as illustrated on Bryan G Hall Plans ref. 12-167-ACC-017-19) overleaf.

Comparative Assessment

Performance of GB1 / GB2	Difference
<p>GB1: Worts Causeway and Hills Road Distance: 4km Time: Foot = 50 minutes Cycle = 15 minutes</p> <p>GB2: Babraham Road and Hills Road Distance: 3.9km Time: Foot = 49 minutes Cycle = 14.5 minutes</p>	<p>GB2 / Extended GB2 Distance:</p> <ul style="list-style-type: none"> Extended GB2 Site situated 600m further from the historic core than Site GB2 <p>Time:</p> <ul style="list-style-type: none"> Extended GB2 Site situated 7 minutes further from the historic core by foot than Site GB2 Extended GB2 Site situated 2.5 minutes further from the historic core by bicycle than Sites GB1 and GB2
Performance of Extended GB1 / GB2	Summary
<p>Extended GB1: Worts Causeway and Hills Road Distance: 4.25km Time: Foot = 53 minutes Cycle = 16 minutes</p> <p>Extended GB2: Babraham Road and Hills Road Distance: 4.5km Time: Foot = 56 minutes Cycle = 17 minutes</p>	<ul style="list-style-type: none"> Options are situated adjacent to foot and cycle routes into the centre of Cambridge. The distance of Extended GB1/2 Sites fall within the 3.1 mile threshold of average UK cycling distances considered by LDA. Both sites are within 4km of the hisotirc core, the equivalent of 2.49 kilometres (3.1 miles is equal to 4.99 kilometres), Both options are situated in a sustainable location with regard to pedestrian and cycle journeys. The sector therefor performs well and would not be considered "sprawl" using LDAs terms, This will comply with the LDA criteria
Difference	
<p>GB1 / Extended GB1 Distance:</p> <ul style="list-style-type: none"> Extended GB1 Site situated 250m further from the historic core than Site GB1 <p>Time:</p> <ul style="list-style-type: none"> Extended GB1 Site 3 minutes further from the historic core by foot than Site GB1 Extended GB1Site 1 minute further from the historic core by bicycle than Site GB1 	



Site Boundaries Key

- Draft GB1/GB2
- Extended GB1/GB2

KEY

Travel Distance

- 0km - 1km
- 1km - 2km
- 2km - 3km
- 3km - 4km
- 4km - 5km
- 5km - 6km
- 6km - 7km

- Historic Core Boundary Origin
- Historic Core

*Historic Core taken from LDA 'Cambridge Inner Green Belt Study' - Figure 7

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A	Draft status removed	RD	DB	24-05-2017
Rev:	Amendment:	DRN:	CHK:	Date:
Client: CEG				

Project: **CAMBRIDGE SOUTH EAST**

Title **TRACC MODELLING TRAVEL DISTANCE CATCHMENT FROM SOUTH EAST CORNER OF HISTORIC CORE**

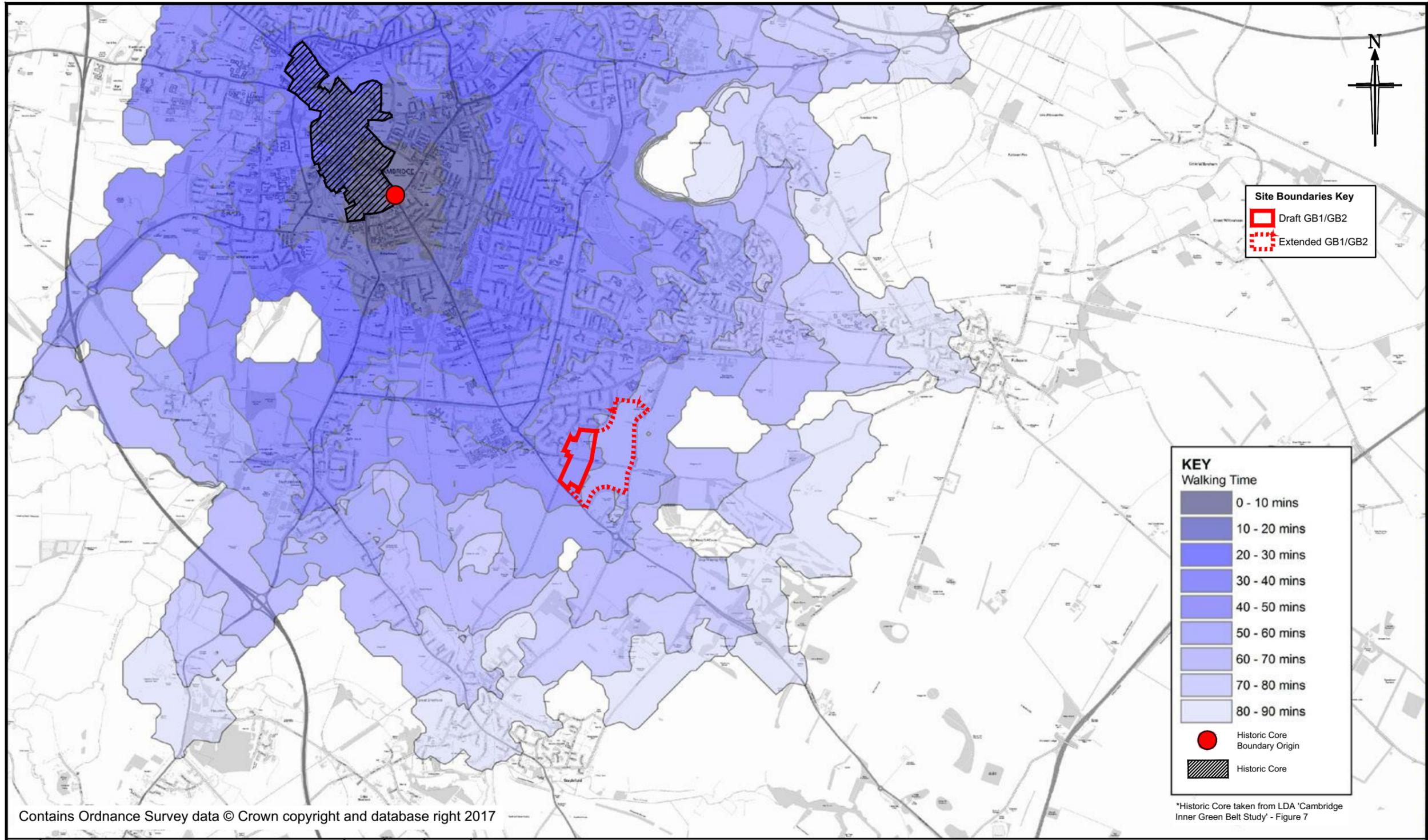
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Scale: N.T.S. Drawing No: 12/167/ACC/017 Revision: A



Site Boundaries Key

- Draft GB1/GB2
- Extended GB1/GB2

KEY
Walking Time

- 0 - 10 mins
- 10 - 20 mins
- 20 - 30 mins
- 30 - 40 mins
- 40 - 50 mins
- 50 - 60 mins
- 60 - 70 mins
- 70 - 80 mins
- 80 - 90 mins

- Historic Core Boundary Origin
- Historic Core

*Historic Core taken from LDA 'Cambridge Inner Green Belt Study' - Figure 7

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A	Draft status removed	RD	DB	24-05-2017
Rev:	Amendment:	DRN:	CHK:	Date:

Client: **CEG**

Project: **CAMBRIDGE SOUTH EAST**

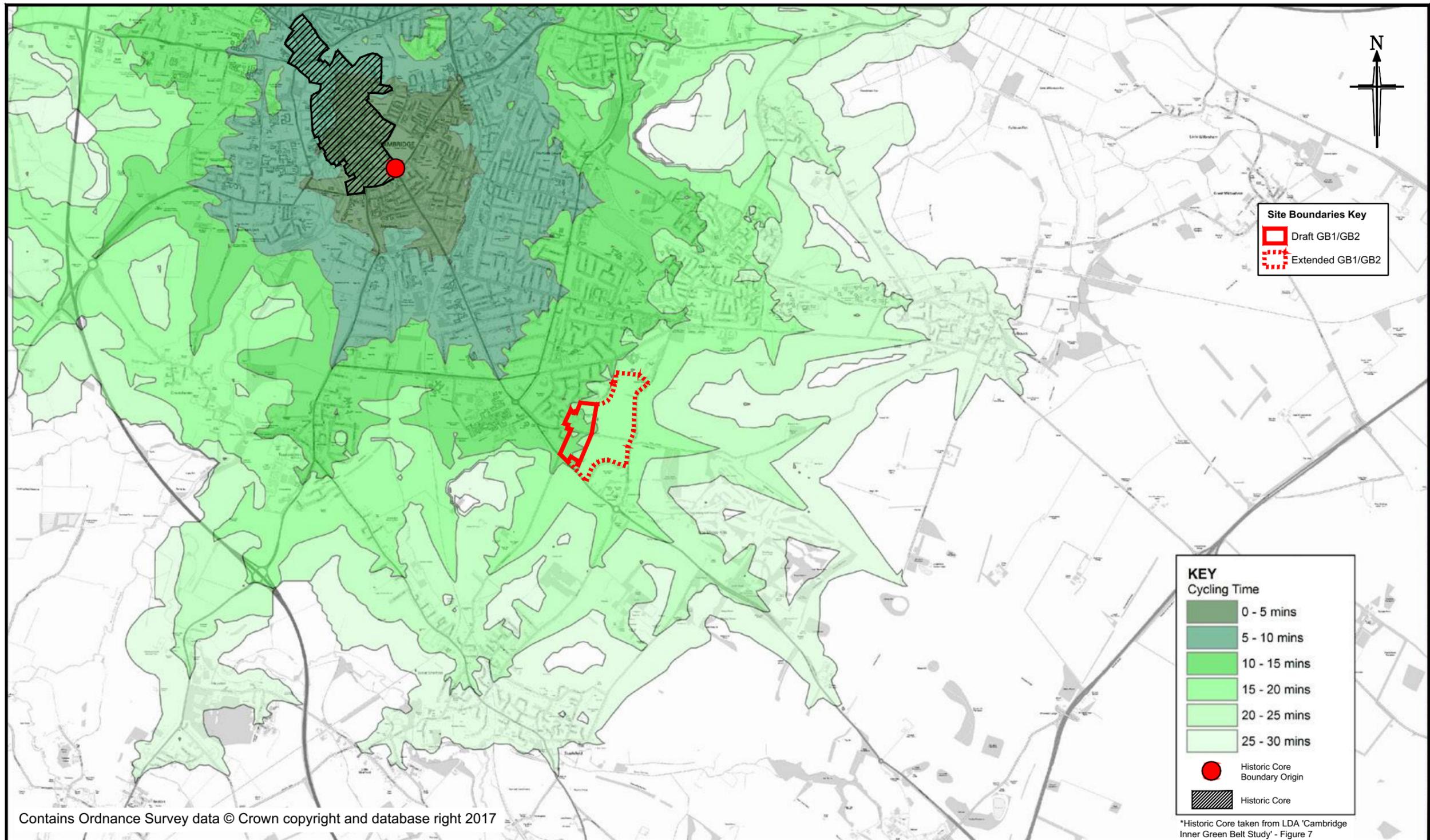
Title: **TRACC MODELLING WALKING TIME CATCHMENT FROM SOUTH EAST CORNER OF HISTORIC CORE**

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Site Boundaries Key

Draft GB1/GB2

Extended GB1/GB2

KEY

Cycling Time

- 0 - 5 mins
- 5 - 10 mins
- 10 - 15 mins
- 15 - 20 mins
- 20 - 25 mins
- 25 - 30 mins

Historic Core Boundary Origin

Historic Core

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*Historic Core taken from LDA 'Cambridge Inner Green Belt Study' - Figure 7

A	Draft status removed	RD	DB	24-05-2017
Rev:	Amendment:	DRN:	CHK:	Date:
Client: CEG				

Project: **CAMBRIDGE SOUTH EAST**

Title: **TRACC MODELLING CYCLING TIME CATCHMENT FROM SOUTH EAST CORNER OF HISTORIC CORE**

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Key Point 2:

Development of the Extended GB1 and GB2 Sites would protect key views towards Cambridge and retain the open slopes of Limekiln Hill and the Gog Magog Hills

LDA Criteria 7 – Key Views of Cambridge from the surrounding landscape

Assessment Criteria / Importance of this Sector to Green Belt Purposes.	Implications of Green Belt Release for Development.	Parameters for Green Belt Release.
<p>There are no defined key views within this sector, but the sector is visible in key views from Magog Down and further east on Wort's Causeway (east), and to a lesser extent from other viewpoints on roads to the south of the sector where the landform is more elevated e.g. Hinton Way. In addition, there are local views of Cambridge from within the SSI and from Limekiln Road, where several of the distinctive landmarks in the historic core are clearly visible.</p>	<p>The rising topography of the Gog Magog Hills would be kept open, retaining a key feature of the setting of the city, and open rural land would be retained on the relatively flat ground at the foot of the hills, protecting the foreground in key views and those of more localised importance.</p>	<p>Land released from the Green Belt should be restricted to parts of the relatively flat ground (as more specifically defined in the following points) and should not encroach onto the sloping ground leading onto the Gog Magog foothills.</p> <p>... the boundary of the released land should tie in with the new urban gateway along Wort's Causeway. The remainder of sub area 11.2 should remain as Green Belt to prevent additional urban sprawl, encroachment into the countryside and excessive loss of rural land at the foot of the Gog Magog Hills.</p> <p>The new urban gateway should be no further east than approximately half the distance from the existing urban edge west of sub area 11.2 towards Cherry Hinton Road / Limekiln Road.</p> <p>By applying the two preceding points, a significant extent of relatively flat land would be retained west of Cherry Hinton Road / Limekiln Road in both sub areas 11.1 and 11.2 to retain open rural land at the foot of the Gog Magog Hills, and the rising topography of the foothills would be kept free from development.</p>

Tyler Grange Analysis

Measure

LDA defines key elevated views from the south and the Gog Magog Hills as: "Elevated views with a countryside foreground and a mixed urban edge"

This is echoed by the assessment of 'Supportive Townscape/ Landscape' to the south and east of Cambridge as including the Gog Magog Hills that: "... lie close to the edge of the city and provide elevated vantage points for panoramic long distance views across open countryside in the foreground, the city in the middle distance, and the open landscape beyond."

Key views, including those from Wort's Causeway and Magog Down, are characterised by the composition of the countryside / rural foreground and city beyond. Key aspects identified by the 2015 Study for key views include the following:

- Composition of view – rural / countryside foreground;
- Urban edge – mixed / soft green edge
- Views of the historic core and city skyline (key landmarks); and
- Rural backdrop in views across the city.

Summary

- The open rural foreground is retained in key elevated views.
- The Extended GB1 / GB2 masterplan parameters retain the slopes of Limekiln Hill as free from development, allowing the landform to remain as a backdrop and feature in the local landscape.
- The foreground of key views would remain undeveloped for both options (GB1 and GB2 and Extended GB1/2 sites). In localised views to and from the edges of Cambridge, Limekiln Hill and the foothills of the Gog Magog Hills would remain as a backdrop.
- This is illustrated by the photomontages prepared by Tyler Grange from key views identified by LDA. The photomontages are contained on the following pages.
- The Extended GB1/2 sites respect the topography of the Gog Magog Hills and localised landform of Limekiln Hill as a feature in the local landscape and accord with the LDA parameters in keeping the foothills free from development.



Key Elevated Views

(as defined by the Cambridge Inner Green Belt Boundary Study, November 2015. LDA Design (RD/MC/030))

-  Sites GB1 and GB2
-  Extended GB1 and GB2
-  Viewpoint Location

Tyler Grange Photoviewpoints

Key Views

Photoviewpoint 1

Wort's Causeway (LDA Photograph 8)

Photoviewpoint 2

Magog Down (LDA Photograph 7)

Photoviewpoint 3

Haverhill Road, west of Magog Down

Photoviewpoint 4

Hinton Way, north of Great Shelford