

Local Plan Examinations
Cambridge City and South Cambridgeshire

Matters and Issues for Joint Hearing Sessions Relating to Proposed Modifications

Matter PM2 - Green Belt Review Methodology

Hearing Statement on behalf of North of Barton Road Land Owners' Group,

by Clive Self MA (Urb Des) Dip LA CMLI

North BRLOG Id.: Cambridge City Council ID. 5336 and South Cambridgeshire District Council ID. 21302

Representation No.: 66139, 66190, 66191

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1. Inspector's Question

1.1 The Inspector has asked the following question in respect of Matter PM2:

'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?'

1.2 This statement has been prepared to provide an initial, written response to the Inspector's Question, and to provide a background for further discussion at the hearing session.

2. Response

2.1 We have previously submitted a detailed review of the Cambridge Inner Green Belt Boundary Study (referred to below as 'the LDA study') in our report dated January 2016 (CSA Document 2025/05), both in terms of its methodology and also the specific consideration which it gives to land to the north of Barton Road.

2.2 This hearing statement does not revisit any of the site-specific issues raised in our earlier report, but seeks to respond to the Inspector's question as set out above, by reference where appropriate to that previous report. Our response is set out below, under the three sub-headings raised by the inspector.

Baseline studies and analysis

Green Belt Purposes

The methodology used in the LDA study is reasonably clear and transparent in itself, but (as set out in sections 2.3 to 2.11 of our January 2016 report) it does not relate fully to the purposes of including land in the Green Belt as set out in the NPPF. It replaces the five NPPF purposes with three 'Cambridge Green Belt Purposes', which in our view are inherently biased towards issues of views and setting, at the expense of the issue of safeguarding the countryside from encroachment. This bias is intensified by the selection of the 16 'qualities' of the city and the land around it which are considered by the LDA study to '*directly contribute to the performance of Green Belt purposes*'. Of those 16 qualities, 15 are related to setting and character, which is only one of the National Green Belt purposes, and others relate more to matters of general landscape character rather than actual Green Belt issues (as set out in sections 2.14 to 2.20 of our January 2016 report).

'Unspoilt' Views

In sections 3.6 to 3.10 of our January 2016 report we noted that the LDA study places great weight on views towards the historic buildings within the city, across the Green Belt, especially from the west, which it says have remained '*substantially intact over the last 300 years*'. Without in any way seeking to downplay the significance of views to the city skyline in terms of the setting of the city, we would observe that in terms of setting out an accurate baseline, the LDA study should have noted the presence in these views of the M11, the new buildings and tower cranes of the ongoing west Cambridge development , and also (and increasingly so over the last few months) other tower cranes in the city centre and to the south - these views certainly contain historic elements, but they are not unspoilt, or unchanging.

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

In order to arrive at some kind of analysis of the Green Belt boundary for different areas around the city, it is obviously necessary to divide the land up by some means, and we have no issue with the way this has been done. However, the study appears to have assumed blanket development across the sub sectors concerned, and to not have considered whether some limited or partial development, occupying part of the sub sector only and retaining some views and some degree of openness, may be appropriate (as set out in sections 3.11 to 3.14 of our January 2016 report).

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

As noted above, most of the qualities are related to at least one of the National Green Belt purposes, albeit with a strong bias towards issues of views and setting. Also as noted above, some of the qualities (in particular numbers 6, 14 and 15) are not well related to Green Belt purposes, and include matters such as the presence or otherwise of long distance footpaths and bridleways (quality 6), designated sites (quality 14) and landscape character (quality 15) which are really matters normally included in assessments of landscape character rather than importance in terms of the Green Belt purposes.

In summary on this issue, while most (but not all) of the 16 qualities relate to Green Belt purposes, they do not do so evenly or in a balanced way - the NPPF does not distinguish between the 5 National Green Belt Purposes, and it can therefore be assumed that they all carry equal weight, but they are not treated in that way in the LDA study.

3. Conclusion

- 3.1 It is our view that there is a clear bias in the LDA study in favour of matters of setting and views, and that this is carried through the study from the adoption of the three 'Cambridge Green Belt Purposes', to the 16 qualities (or assessment criteria), and also in the way in which the existing views are described and given importance.
- 3.2 As set out in sections 2.15 to 2.17 of our January 2016 report, it could perhaps be argued that this is an appropriate approach in the case of Cambridge, which is clearly a historic city with a very important setting, but the qualities should have been selected in a more even-handed manner to enable a more balanced assessment against the National Green Belt purposes. This matters because the study is therefore potentially biased against areas of land which may have greater effects against one of the five purposes (setting), but which may have had much lesser effects against two of those not given such prominence among the qualities (encroachment into the countryside and merging of settlements). For example, the study clearly favours areas out to the south east of the city, where the encroachment into the countryside would be at a greater distance from the city centre and less well contained than would the areas to the west, which are much closer in to the city centre, and contained by the line of the M11.
- 3.3 There is clearly a planning balance to be struck, and to a degree setting is the other side of the coin of encroachment and sprawl, as areas closer in to the city centre could potentially affect setting to a greater degree, whereas those further out may well be worse in terms of sprawl and encroachment, but in our view the methodology of the LDA study has prevented that balance being fairly struck.