LOCAL PLAN EXAMINATION

CAMBRIDGE CITY & SOUTH CAMBRIDGESHIRE

MATTER 6

POINTS OF CLARIFICATION ON GREEN BELT

ASSESSMENT ANOMALIES

SCDC
L.P.A.

PREPARED BY

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BIDWELLS

3 0 MAR 2015

ON BEHALF OF

PIGEON LAND AND LANDS IMPROVEMENT HOLDINGS

25th March 2015

FORWARD

(CODE Development Planners)

I am very disappointed to have to report that we have been unable to agree a joint statement with the Council on the very real anomalies in the Council tables identifying firstly, the aggregated importance of land parcels to the Green Belt and secondly, the magnitude of impact and significance of development in the Green Belt (RD/Strat/210) as requested by the Inspector.

As you will have seen from copy correspondence, we have attempted through Helen Thompson to produce a format in which anomalies could have been clearly identified and, where there remained disagreement, clearly explained. The Councils have instead chosen to rely on a more general accusation that Ms. Thompson misunderstands some of the methodology used in the 2012 study. I am afraid this response merely repeats the Councils' case proffered in their Hearing statements and takes us no further forward in explaining the specific and still unexplained anomalies in the results of the assessments. Put another way, the results of testing parcels of Green Belt land have clearly been skewed to disfavour those areas not recommended for release from the Green Belt.

Without explanation from the Councils we respectfully direct the Inspector to the obvious anomalies related to a large number of individual land parcels as noted below using the Councils' base table in RD/Strat/210.

This represents further evidence of the unjustified conclusions of the Green Belt assessment carried out not in accordance with industry best practice. We can only conclude that this is further evidence of the Councils 'retro-fitting' and misleading evidence to seek to justify a pre-conceived decision on overall development strategy, site allocations and omission sites .

1 SUBMISSION TO THE INSPECTOR ON THE POINTS FOR CLARIFICATION SOUGHT BY PIGEON/LIH ON MATTER 6

1.1 During Matter 6, the Inspector asked the promoters of Cambridge South to liaise with the Councils on the anomalies they identified in RD/STRAT/210.

1.2 The points which Pigeon/LIH are seeking clarification were submitted to the Councils for their consideration on 17th February 2015.

1.3 The Councils sent a general response to these points on 9th March 2015 without addressing the specific points raised.

1.4 This statement sets out the identified anomalies for the Inspector's consideration.

1.5 Table 1 below sets out the Councils' findings on importance to setting, character and separation of all the areas around Cambridge. The Councils' aggregated value of Importance to Green Belt does not then correspond to the highest value of importance to setting, character and physical separation and there is no evidence offered as to why this is the case.

1.6 Of the 53 areas assessed, there are 22 with an aggregated score which is higher than what could be expected from the assessment of setting, character and separation. There is no evidence offered as to what has skewed the assessment, nor how this relates to the purpose of the Green Belt. These 22 areas with an unsubstantiated higher score are highlighted in an amber colour in Table 1.

1.7 There are four areas, all in Sector 15, which are lower than the aggregated value which could be expected from the assessment of setting, character and separation. There is no evidence offered as to what has skewed the assessment, nor how this relates to the purpose of the Green Belt. These are highlighted in a blue colour in Table 1.

1.8 In total, there are 26 areas (49% of total) with an aggregated score for the Importance to the Green Belt which do not correspond with the assessment of setting, character or separation set out by the Councils. There is no evidence base to account for this deviation.

Table 1 – Anomalies in Aggregation of Significance to GB

SECTOR	AREA	Importance to Setting	Importance to Character of City	Importance to Separation	IMPORTANCE TO GREEN BELT (aggregated score)	Aggregation
1	1	High/Medium	Low	High	Very High	Additional importance added in aggregated score – no evidence to support.
	2	Low	High	Very High	Very High	
	3	Medium	Low	Medium/High	Medium/High	
2	1	Very High	Very High	Negligible	Very High	
3	1	Very High	High	Not attributed in tables	Very High	
	2	Medium	Low	n/a	Medium/Low	
	3	High	Medium	n/a	High	
	4	Medium	Medium	n/a	High	Additional importance added in aggregated score – no evidence to support.
4	1	Very High	High	Medium	Very High	
	2	High	Low	Negligible	High	
	3	Very High	High	High/Medium	Very High	
	4	Very High	Medium	High	Very High	
	5	Medium	Low	Low	High	Additional importance added in aggregated score – no evidence to support.
5	1	High	High	High	Very High	Additional importance added in aggregated score – no evidence to support.

	2	High	High	High	Very High	Additional importance added in aggregated score – no evidence to support.
6	1	Low	High	Negligible	High	
	2	Low	High	Negligible	High	
	3	Very High	High	Medium	Very High	
7	1	Very High	High	High	Very High	
8	1	High	Medium	Medium	Very High	Additional importance added in aggregated score – no evidence to support.
	2	Low	Low	Negligible	Medium	Additional importance added in aggregated score – no evidence to support.
	3	Negligible	Negligible	Negligible	Medium	Additional importance added in aggregated score – no evidence to support.
	4	Low	Low	Negligible	Medium	Additional importance added in aggregated score – no evidence to support.
9	1	Low	Very High/Medium	Negligible	Very High	
10	1	Medium	Medium	Low	High	Additional importance added in aggregated score – no evidence to support.
	2	High	High	High	High	
	3	Medium	Medium	Medium	High	Additional importance added in aggregated score – no evidence to support.

11	1	Medium	Medium	Low	Medium	
	2	High	High	Low	Very High	Additional importance added in aggregated score – no evidence to support.
	3	Medium	Medium	Low	High	Additional importance added in aggregated score – no evidence to support.
	4	Medium	Medium	Low	Medium	
12	1	Low	Low	n/a	Medium	Additional importance added in aggregated score – no evidence to support.
	2	Low	Low	n/a	Medium	Additional importance added in aggregated score – no evidence to support.
	3	Very High	Medium	Low	Very High	
13	1	High/Medium	Low	High	Very High	Additional importance added in aggregated score – no evidence to support.
	2	High	Medium	High	Very High	Additional importance added in aggregated score – no evidence to support.
14	1	Medium	Low	High	Very High	Additional importance added in aggregated score – no evidence to support.
	2	Medium	Low	High	Very High	Additional importance added in aggregated score – no evidence to support.
	3	Low/Medium	Low	Medium	Medium	

	4	Low	Low	Low	Low	
15	1	Low	Negligible	Medium	Low	Lesser importance than aggregated score.
	2	Low	Negligible	Medium	Low	Lesser importance than aggregated score.
	3	Low	Negligible	Medium	Low	Lesser importance than aggregated score.
	4	Low	Negligible	Medium	Low	Lesser importance than aggregated score.
16	1	Medium	Low	Low	High	Additional importance added in aggregated score – no evidence to support.
	2	Low	Low	Low	Low	
	3	Low	Medium	Low	Medium	
17	1	Low	Negligible	Low	Very High	Additional importance added in aggregated score – no evidence to support.
18	1	High	Medium	High	Very High	Additional importance added in aggregated score – no evidence to support.
	2	High	Medium	High	High	
	3	Medium	Low	High	High	
	4	Medium	Low	High	High	
	5	Low	Low	High	High	

Amber colour denotes an inflated aggregated value of Importance to Green Belt.
Blue colour denotes a deflated aggregated value of Importance to Green Belt.

1.9   49% of the assessments of Importance to Green Belt for the Sector/Areas do not relate to the assessment of setting, character and separation.

1.10   There is no evidence base why these valuations have deviated from the assessment of setting, character and separation.

1.11   The aggregation of the value of the Importance to Green Belt is flawed in 49% of the Areas with no explanation. As there is no evidence base to explain the deviations, RD/STRAT/210 is neither robust nor transparent.

Magnitude and Significance

1.12   For the first time at the Hearing on Matter 6, we learned that the assessment of magnitude of effect (RD/STRAT/210 Table 1) was based on a dense three to four storey housing development (there was some dispute at the Examination that two storey was mentioned).

1.13   We outlined that this assumption could not be applied universally, to a proposed research and development hub set in parkland for example.

1.14   We also find there are anomalies peppered through the document with regard to the Significance of Development on the Green Belt caused by the misuse of Table 1 RD/STRAT/210. Table 2 below sets this out with the anomalies highlighted in a pink tone.

1.15   The value of magnitude was extrapolated from the Councils' figures for Importance to Green Belt and Significance of Development as set out in Table 1 of RD/STRAT/210.

Table 2 Importance to Green Belt, Magnitude and Sensitivity

Sector	Area	Importance to Green Belt	Magnitude[1]	Significance of Development	Comments
1	1	Very High	Very High	Very High	The significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Very High	Very High	Very High	The significance should read MAJOR.
	3	Medium/High	High	Medium/High	
2	1	Very High	Very High	Very High	The significance should read MAJOR.
3	1	Very High	Very High	Very High	The significance should read MAJOR.
	2	Medium/Low	High	Medium	
	3	High	Very High	High	
	4	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High importance to GB. This is not only wrong in the aggregation, it is wrong in the application of the matrix.
4	1	Very High	Very High	Very High	The significance should read MAJOR.
	2	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	3	Very High	Very High	Very High	The significance should read MAJOR.
	4	Very High	Very High	Very High	The significance should read MAJOR.
	5	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB. This is not only wrong in the aggregation, it is wrong in the application of the matrix.
5	1	Very High	Very High	Very High	The significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Very High	Very High	Very High	The significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.

6	1	High	Very High	High	
	2	High	Very High	High	
	3	Very High	Very High	Very High	
					The Significance should read MAJOR.
7	1	Very High	Very High	Very High	
					The Significance should read MAJOR.
8	1	Very High	Very High	Very High	
					The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Medium	Very High	High	The Significance should read HIGH/MEDIUM. The significance is based on inflated aggregation value for Importance to Green Belt.
	3	Medium	No change	Negligible	The significance is based on inflated aggregation value for Importance to Green Belt.
	4	Medium	Very High	High	The Significance should read HIGH/MEDIUM. The significance is based on inflated aggregation value for Importance to Green Belt.
9	1	Very High	Very High	Very High	
					The Significance should read MAJOR
10	1	High	Not available in matrix.	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High importance to GB. This is not only wrong in the aggregation, it is wrong in the application of the matrix.
	2	High		Very High	A Significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	3	High		Very High	A Significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB. This is not only wrong in the aggregation, it is wrong in the application of the matrix.
11	1	Medium	High	Medium	
	2	Very High	Very High	Very High	
					The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
	3	High	Very High	High	The significance is based on inflated aggregation value for Importance to Green Belt.
	4	Medium		Medium	

12	1	Medium	High	Medium	The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Medium	High	Medium	The significance is based on inflated aggregation value for Importance to Green Belt.
	3	Very High	Very High	Very High	The Significance should read MAJOR
13	1	Very High	High	High	The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Very High	Very High	Very High	The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
14	1	Very High	High	High	The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Very High	Low	Medium	The significance is based on inflated aggregation value for Importance to Green Belt.
	3	Medium	High	Medium	
	4	Low	Medium	Low	
15	1	Low	Medium	Low	The significance is based on deflated aggregation value for Importance to Green Belt.
	2	Low	Medium	Low	The significance is based on deflated aggregation value for Importance to Green Belt.
	3	Low	Medium	Low	The significance is based on deflated aggregation value for Importance to Green Belt.
	4	Low	Medium	Low	The significance is based on deflated aggregation value for Importance to Green Belt.
16	1	High	Very High	High	The significance is based on inflated aggregation value for Importance to Green Belt.
	2	Low	Medium	Low	
	3	Medium	High	Medium	
17	1	Very High	Very High	Very High	The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.
18	1	Very High	Very High	Very High	The Significance should read MAJOR. The significance is based on inflated aggregation value for Importance to Green Belt.

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	2	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	3	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	4	High	Not available in matrix	Very High	A significance value of Very High (aka MAJOR) cannot be achieved from a High Importance to GB.
	5	High	Very High	High	

Amber colour denotes inflation of the aggregated value of Importance to Green Belt
Blue colour denotes deflation of the aggregated value of Importance to Green Belt
Pink colour denotes error in use of matrix
Red colour denotes anomaly/error either in aggregated value or use of matrix, or both.

1.16 Setting aside any challenge to the Councils' interpretation of Importance to Setting, Importance to Character of City, and Importance to Separation, even so, we find there are 33 irregularities in the determination of Significance.

1.17 There are 53 Sector/Areas; 33 irregularities constitutes 58% of the Sectors/Areas being attributed to the wrong values of Significance of Development on the Green Belt according to the methodology.

1.18 These are the anomalies for which Pigeon/LIH seek clarification. Currently there is no justification for these anomalies. RD/STRAT/210 is not sound and should not be relied upon to identify land which could be released from the Green Belt.
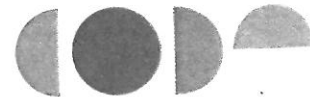
Ref: 007-001
25th March 2015

Ms G Alexandra
Programme Officer
Public Examination Office
The Guildhall
Market Square
Cambridge
CB2 3QJ

Dear Gloria

Cambridge City and South Cambridgeshire Hearing
Outstanding Matter 6 Green Belt Anomalies
On behalf of Pigeon Land Limited and Lands Improvement Holding Ltd
(CCC 5102 / SCD 20801)

I enclose for the Inspector's consideration my client's submitted note on the anomalies in the Council's Green Belt review assessment.

You will recall that the Inspector had requested that the Councils and Pigeon/LIH prepare a joint statement to identify and explain the anomalies. Unfortunately we have been unable to agree a statement with the Council and, therefore, submit the attached note to explain our view of what we see as very real anomalies.

Yours sincerely

Mike Carpenter
Director

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Encs:

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