



Examination into the Soundness of the
Cambridge Local Plan and
South Cambridgeshire Local Plan

Matter PM2 – Green Belt Review methodology

Joint Matter Statement produced by LDA Design
on behalf of Cambridge City Council and
South Cambridgeshire District Council

May 2016

Contents		Page
	Overview	1
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:	2
a.	Baseline studies and analysis	2
b.	The identification of areas for assessment (the sectors and sub sectors)	3
c.	Identification of qualities/assessment criteria – are all 16 clearly related to Green Belt purposes?	4
Appendices		
	Appendix 1: List of Reference Documents	8

Overview

1. This Statement has been prepared by LDA Design on behalf of Cambridge City Council and South Cambridgeshire District Council to respond to the issues raised by the Inspectors in relation to Matter PM2 regarding the methodology for the Green Belt Review undertaken by LDA Design (Cambridge Inner Green Belt Boundary Study (November 2015)¹ and Cambridge Inner Green Belt Boundary Study (November 2015) Supplement - March 2016², jointly referred to in this statement as ‘the Study’.
2. Following the Inspectors’ letter of 20 May 2015, the two Councils commissioned LDA Design to specifically address the concerns about the Green Belt methodology raised in the Inspectors’ preliminary conclusions letter. This involved undertaking the following:
 - Assessment of the Inner Green Belt Boundary and set out the methodology used. The assessment should provide a robust, transparent and clear understanding of how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt;
 - Review the methodologies put forward by objectors in relation to the Inner Green Belt Boundary.
3. The LDA Design Study is an independent assessment of the Inner Green Belt Boundary in relation to the purposes of the Cambridge Green Belt. It is not intended to be consistent with the Councils’ 2012 Study, although it is noted to have largely consistent findings. As discussed at paragraphs 6.3.1 - 6.3.4 of the Study, the great majority of the land within the study area for both studies was assessed as being important to Green Belt purposes, with the main differences identified to the east of the city and small differences to the south and south east.
4. Within the ambit of the issues raised by the Inspectors in relation to Matter PM2, this statement addresses many of the significant points raised in representations by third parties in relation to Green Belt methodology. These points are summarised within the Proposed Modifications Report on Consultation (March 2016)³, with those points relevant to Green Belt methodology addressed in this statement.
5. Many of the representations by third parties raise site specific issues in relation to the assessment of specific sectors and/or sub areas within the Study. The Inspectors have indicated that the Matter PM2 hearing on 9 June 2016 will not consider site specific issues, which will be dealt with when specific allocations or omission sites are considered. Consequently, site specific issues are not addressed in this statement but will be addressed in subsequent statements for the site specific hearings.

¹ RD/MC/030

² RD/MC/031

³ RD/MC/120, PM/SC/2/C, page A100, and PM/CC/2/E, page A37.

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

6. Section 4.0 of the Study presents baseline studies and analysis that enable a thorough understanding of those aspects of Cambridge and its surrounding landscape that are relevant to Green Belt purposes. These cover a range of aspects which have a bearing on how the issues raised by Green Belt purposes (sprawl, merging, encroachment, setting and character) are manifested in Cambridge and its surrounding landscape or are perceived by residents or visitors to the city. They include matters relating to the physical form and scale of the city, its historical development, its relationship to its hinterland, the character of the townscape and surrounding landscape, the experience of approaching and arriving at the city, and how the city is perceived from the surrounding landscape.
7. The studies included in section 4.0 of the Study include factual matters such as designations, rights of way and topography. They also include matters requiring assessment and analysis such as townscape and landscape character assessments, a visual assessment and analysis of the process of arrival at Cambridge through consideration of approaches and gateways. Section 4.0 draws significantly from material contained in LDA Design's 2002 Cambridge Green Belt Study⁴, which was checked, validated and updated as necessary for the purposes of the 2015 Study. The findings of the baseline studies and analysis are presented on a series of drawings and photograph panels, which provide a clear illustration of both the factual matters and the assessments made.
8. Section 3.1 of the Study explains why it is necessary to identify the particular qualities that are relevant to Green Belt purposes in order to assess the performance of areas of land against those purposes (see also the response to item c below).
9. National Green Belt purpose 4⁵ and Cambridge Green Belt purposes 1 and 2⁶ refer to character and setting. It is not possible to assess the performance of areas of Green Belt land in terms of the character and setting of Cambridge without first understanding the various qualities that make up the character and setting of the city. To identify these qualities, a series of standard baseline studies was undertaken, including a study of the historic development of the city, a review of environmental and cultural designations, identification of recreational routes and recreational landscapes surrounding the city, analysis of geology and topography, townscape and landscape character assessments, and a visual assessment. As it became clear from these studies that factors such as green corridors and the necklace villages contributed to setting and character, studies were also undertaken of these. The experience of approaching and arriving at a settlement contributes significantly to how its character and setting are perceived, so this was also studied. Finally, the nationally recognised 'Winchester methodology' for analysing the setting of historic cities was employed.

⁴ RD/Strat/180

⁵ RD/NP/010

⁶ RD/AD/100; RD/AD/300; RD/Sub/SC/010; RD/Sub/C/010.

10. National Green Belt purposes 1 and 3 are concerned with sprawl and encroachment into the countryside. Similarly, it is necessary to identify the qualities of the city and its surrounding landscape that are relevant to sprawl and encroachment in order to assess the performance of Green Belt sectors against these qualities. Many of the studies referred to above in relation to character and setting also enable qualities relevant to sprawl and encroachment to be identified, such as the scale and compactness of the city, the nature of its edges, and the structure and character of the landscape adjoining its edges. These are identified principally through townscape and landscape assessment and visual assessment, although other studies are also relevant such as analysis of approaches and gateways and the historic development of the city.
 11. The merging of settlements, which is the subject of National Green Belt purpose 2 and Cambridge Green Belt purpose 3, is a simpler concept than setting, character, sprawl and encroachment. It is recognised that the Framework talks about merging of towns, and others have sought to place a literal interpretation of the Framework here. However, it is considered that the word ‘towns’ in this context refers to material settlements. It cannot be that anything less than a town does not matter in Green Belt terms, especially where villages are a key aspect of a local area as is the case for the necklace villages around Cambridge. As explained in sections 4.12 and 4.13 of the Study, the proximity and separate identities and character of the inner necklace villages are components of the character and setting of the city. The assessment of separation is more straightforward than other Green Belt concepts but it nevertheless comprises several aspects that require careful consideration. Studies were undertaken that looked at the spatial pattern and distribution of the villages and at their character and identity in order to address these purposes. The character of the landscape surrounding the villages is also relevant to their sense of separation, so landscape character assessment was also relevant.
- b. The identification of areas for assessment (the sectors and sub sectors)**
12. Paragraphs 3.2.4 - 3.2.5 of the Study set out the basis for the identification of the sectors and sub areas used for the assessment. The sectors were defined on a simple spatial basis to provide a clear and robust structure for the presentation of the assessment, working around the perimeter of Cambridge, using radial routes and, where necessary, other roads, the river or occasionally field boundaries to divide one sector from another. Most sectors were then divided into sub areas where there were clear changes in characteristics which would affect the application of the assessment criteria to different areas of land.
 13. The issues raised by Green Belt purposes and by the 16 qualities identified in the Study are broad scale issues that are most appropriately considered in relation to areas of land at a relatively broad scale. Where an area of land performs a particular role in relation to the setting of the city, that role is very unlikely to stop abruptly, for example at a field boundary, so that one field can be assessed as performing the role in question and the next field can be assessed as not performing it. Rather, the performance of the role is likely to gradually increase or reduce across an area of landscape, with no clear boundary where the role starts to be performed. Assessing larger parcels of land enables this transition to be noted and taken into account. Dividing land into smaller parcels, particularly when associated with a scoring system that ranks parcels in relation to the number of Green Belt purposes or

criteria they meet, obscures this gradual transition and can lead to a conclusion that certain parcels are of lesser importance to Green Belt purposes and should therefore be released for development. However, such a fine-grained approach does not allow for any assessment of the effects of the development of one land parcel on adjacent parcels, which might be diminished in terms of their own performance of Green Belt purposes. The effects of the release of a small parcel of land for development can therefore be greater than the loss of that parcel's contribution to Green Belt purposes.

14. The approach taken in the Study, of assessing broader parcels of land which are consistent in land use, character and context, enables such broader effects to be taken into account in considering the implications of the release of land from Green Belt for development.
15. Notwithstanding the assessment of importance to Green Belt purposes by reference to larger parcels of land, consideration has been given as to whether it may be possible for certain areas of land to be released from the Green Belt for development without significant harm to Green Belt purposes. The assessment of this consideration has not been constrained by parcel size and, in several instances has concluded that part of a sector or sub area could be released from Green Belt and that limited development, if handled appropriately, could take place in these locations without significant harm to Green Belt purposes, as summarised at paragraph 6.2.2 of the Study. In each case, parameters are set for any such development to avoid significant harm to the purposes of the Green Belt.
16. The representations from Grosvenor Developments (66109, 66110, 66111, 66112) suggested that sector 7 should be divided into sub areas, based on the different land uses within it. Within the main Study, sector 7 is treated as a single area, due to the similar contribution to Green Belt purposes across different land uses within the sector. However, as there are some slight differences between the area laid out as a country park and that returned to agricultural use, the sector has been sub-divided into two sub areas in the Cambridge Inner Green Belt Boundary Study (November 2015) Supplement - March 2016⁷.

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

17. Green Belt purposes are concerned with concepts that are somewhat esoteric or abstract, such as 'unrestricted sprawl', 'encroachment', 'setting' and 'special character'. If an attempt was made to assess the performance of areas of land in terms of these concepts without defining them more clearly, it is likely that differences in interpretation would arise, leading to subjective judgements based on differing applications of the concepts. The approach taken by LDA Design in the Study was to make the assessment as objective as possible. To achieve this, the Study analysed the concepts underlying the Green Belt purposes and identified the particular qualities of Cambridge and its surrounding landscape that contribute to the performance of Green Belt purposes. 16 qualities were identified that were then used as criteria for the assessment (see paragraph 21 below).

⁷ RD/MC/031

18. As noted at paragraph 2.2.7 of the Study, the development of the Cambridge Green Belt purposes is described in Appendix 6 to the Councils' Joint Statement on Matter 6⁸. The Matter 6 Statement refers to paragraph 8.10 of the Structure Plan Examination in Public Panel Report⁹, which states that *'in the case of Cambridge it only has a Green Belt because it is a historic city. It follows that all five purposes of Green Belts as set out in paragraph 1.5 of PPG2 are not necessarily relevant to this Green Belt'*. The EiP Panel endorsed the Cambridge Green Belt purposes, which were stated in the Structure Plan and primarily relate to the character and setting of Cambridge and preventing the merging of settlements, and thus focus particularly on only two of the five National Green Belt purposes. In relation to National Green Belt purpose 4 (setting and special character), the PAS Green Belt document (Planning on the Doorstep: The Big Issues - Green Belt¹⁰ states *'This purpose is generally accepted as relating to very few settlements in practice'*, confirming that the Cambridge Green Belt differs from most other Green Belts in this respect.
19. It is therefore clear that it is not necessary for land within Green Belt to perform all five of the Green Belt purposes laid down in paragraph 80 of the Framework. In turn, it follows that the importance of a particular area of land to Green Belt is not determined by the number of Green Belt purposes it performs. Methodologies that assess areas of land against a range of Green Belt purposes and rank land according to how many purposes it performs are therefore flawed. Since Cambridge *'only has a Green Belt because it is a historic city'*¹¹, an area of land that plays a key role in relation to the setting of Cambridge could be highly important to retain as Green Belt even if it performed no other Green Belt purpose.
20. With the exception of National Green Belt purpose 5, the LDA Design Study takes full account of all National Green Belt purposes and Cambridge Green Belt purposes. National Green Belt purpose 5 was scoped out, as described at paragraph 2.2.5 of the LDA Design Study. The PAS Green Belt document¹² confirms the validity of scoping out National Green Belt purpose 5, stating *'If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose'*. The LDA Design Study's compliance with PAS advice is raised in the representation by Grosvenor. The criticism appears to be that the LDA Design Study does not assess land parcels against specific Green Belt purposes. The text within the PAS document on which Grosvenor relies states *'Any review of Green Belt boundaries should involve an assessment of how the land still contributes to the five purposes ...'*. The LDA Study assesses the performance of land parcels against Green Belt purposes by means of the 16 qualities. There is no suggestion in the PAS guidance that the LDA Design approach is invalid.
21. The Study identified the particular qualities of Cambridge and its surrounding landscape that contribute to the performance of Green Belt purposes in two ways:
1. Reviewing the qualities that had been identified in previous studies and policy documents (section 2.3 of the Study);

⁸ M6/CCC&SCDC

⁹ RD/AD/011

¹⁰ RD/Strat/460

¹¹ RD/AD/011, paragraph 8.10

¹² RD/Strat/460

2. Undertaking extensive baseline studies and analysis as described in section 4.0 of the Study and summarised in section 4.15.
22. In these two ways, the 16 qualities used as criteria for the assessment were identified. The 16 qualities are described fully in section 5.2 of the Study. The qualities are largely similar to the Special Qualities identified in LDA Design's 2002 Cambridge Green Belt Study¹³ but were modified and expanded as necessary to address all relevant Green Belt purposes. Whilst the identification of the qualities follows on from the findings of the baseline studies and analysis, many of them have been identified in previous studies by others or in policy documents relating to the Green Belt.
23. The first paragraph of the description of each quality explains the relevance of the quality by reference to Green Belt purposes and qualities identified in previous studies and policy documents. Each of the qualities is therefore clearly founded in Green Belt purposes and the summary table on pages 59-60 shows that all 16 qualities have a relationship to at least one of the National Green Belt purposes and all qualities except no. 10 (Good Urban Structure with Well-Designed Edges to the City) have a relationship to at least one of the Cambridge Green Belt purposes. Conversely, at least two qualities are identified as being relevant to each of the National Green Belt purposes and Cambridge Green Belt purposes.
24. Whilst the number of qualities relevant to each Green Belt purpose varies, the Study does not assess the importance of areas of land by virtue of the number of Green Belt purposes they perform or the number of qualities they exhibit. For the same reason, the fact that some qualities relate to more than one purpose does not mean there is any double counting in the assessment.
25. The representations from Pigeon Land (65522, 65431) suggest that the Role and Function classification used in the Study is a quasi-scoring system. This is not correct. The classification (known as the Winchester Methodology) is a method of identifying areas of townscape and landscape that play a greater or lesser role in defining or supporting the distinctiveness of a historic city and its setting. If taken on its own, it could be used as a crude scoring system (Distinctive areas being more 'important' than Supportive areas) but the Study does not use it in this way. Rather, the classification is one of the qualities used to enable the assessment of the performance of areas of Green Belt.
26. At the end of each sector assessment in the Study, under the heading 'Importance of the Sector to Green Belt Purposes' the Study identifies the qualities which are most relevant to the sector and sub areas, on which the assessment of importance is primarily based. In most cases, one or two particular qualities are of most relevance but the qualities differ from one sector to another. For example, particular qualities in sector 3 are those that relate to the presence of open countryside close to the city centre, ensuring that the city remains compact and that the historic core remains large in comparison to the size of the city as a whole. In sectors in the south-east of the city, topography is of particular relevance, with the Gog Magog Hills forming a key component of the setting of the city and their foothills forming the backdrop in views out from and across Cambridge. In various other sectors, Green Belt

¹³ RD/Strat/180

land plays a key role in maintaining separation between Cambridge and the necklace villages.

27. In each of the above examples, land in the sectors is important to Green Belt purposes primarily because of the qualities stated. However, it is not possible to compare the importance of one quality on one side of the city with another quality on another side of the city. Any such comparison, or any weighting of criteria to enable such a comparison, would be entirely subjective. The intention in the Study was to take an objective approach. In analysing the complex issues raised by Green Belt purposes, baseline information must be assessed and professional judgement must be exercised to arrive at robust and justifiable conclusions which can be relied on to inform the Local Plan process. The need for professional judgement cannot be avoided and does not mean that the assessments are subjective in the sense that they are merely one person's opinion and another person might have a different opinion.

Appendix 1: List of Reference Documents

National Policy:

- National Planning Policy Framework (RD/NP/010).

South Cambridgeshire District Council Submission Documents:

- Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010).

Cambridge City Council Submission Documents:

- Cambridge Local Plan 2014 - Proposed Submission (RD/Sub/C/010).

Adopted Development Plan Documents:

- Cambridgeshire and Peterborough Structure Plan Examination in Public Report (RD/AD/011);
- South Cambridgeshire District Council Core Strategy Development Plan Document (RD/AD/100);
- Cambridge Local Plan 2006 (RD/AD/300).

Development Strategy:

- Cambridge Green Belt Study (RD/Strat/180);
- Planning on the Doorstep: The Big Issues - Green Belt, PAS (RD/Strat/460).

Matter Statements:

- Matter 6: Green Belt Statement, Cambridge City Council and South Cambridgeshire District Council (M6/CCC & SCDC).

Modifications Consultation:

- Cambridge Inner Green Belt Boundary Study (November 2015)(RD/MC/030);
- Cambridge Inner Green Belt Boundary Study (November 2015) Supplement – March 2016 (RD/MC/031);
- Proposed Modifications – Report on Consultation (March 2016) (RD/MC/120).