

**CCC LP and SCDC LP**

**Proposed Modifications  
Joint Hearing**

**PM2 – GREEN BELT  
REVIEW METHODOLOGY**

PM2-17788



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**Barratt Eastern Counties and the North West Cambridge  
Consortium of Landowners (55550)**

17788

LPA

**Independent Examinations**

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

**May 2016**

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**Hearing Statement for Matter PM2 / 17788**

## Matter PM2 Green Belt Review Methodology

Focussing on point c. there are concerns over the cogency/ logic of argument to the approach of applying a site specific assessment criteria as defined in Section 5.0 of the Study. This approach extends beyond the context of the National Planning Policy Framework (NPPF), and aims to identify a list of 16 criteria based on various baseline studies and analysis '*drawn from the studies and analysis*'. Each of these criteria covers 19 sectors of the Inner Green Belt. These have been numbered for ease of reference:

1. *A large historic core relative to the size of the city as a whole;*
2. *A city focussed on the historic core;*
3. *Short and / or characteristic approaches to Cambridge from the edge of the city;*
4. *A city of a human scale easily crossed by foot and by bicycle;*
5. *Topography providing a framework to Cambridge;*
6. *Long distance footpaths and bridleways providing access to the countryside;*
7. *Key views of Cambridge from the surrounding landscape;*
8. *Significant areas of distinctive and supportive townscape and landscape;*
9. *A soft green edge to the city;*
10. *Good urban structure with well-designed edges to the city;*
11. *Green corridors into the city;*
12. *The distribution, physical and visual separation of necklace villages;*
13. *The scale, character, identity and rural setting of the necklace villages;*
14. *Designated sites and areas enriching the setting of Cambridge;*
15. *Elements and features contributing positively to the character of the landscape setting;*
16. *A city set in a landscape which retains a strongly rural character;*

The question relating to how relevant these are to the purpose of the Green Belt appears to seek further clarity on how each of these criteria can applied to individual sectors and subsectors across Cambridge.

In addition to this, it is not clear how a summary taken from a range of sites across Cambridge can be used to make an informed assessment to understand the importance of the performance and relevance to each of the 19 sectors within the Green Belt. The following identifies how relevant each of the criteria are within the context of Green Belt purposes and the supporting NPPF:

1. *A large historic core relative to the size of the city as a whole*; - **Not Relevant**  
Green belt parcels do contribute to ensuring city wide development is restricted, therefore ensuring a large historic core is retained and protected. However, the test to ensure whether or not a site contributes to this can be assessed against the NPPF purpose of *to check the unrestricted sprawl of large built-up areas*, therefore this has no weight as a matter of policy relating to Green Belt.
2. *A city focussed on the historic core*; - **Not Relevant**  
How is this defined as part of the assessment as it has not been made clear? Is this based solely on the importance placed upon historic views? This is about preserving the setting of Cambridge but is it vague in its use within the report. This has no weight as a matter of policy relating to Green Belt.
3. *Short and / or characteristic approaches to Cambridge from the edge of the city*; - **Not Relevant**  
The assessment does not define what the interpretation of 'short' is and nor does it explain how it should be interpreted as part of the assessment work. The report makes several references to the term 'short' but nowhere does it aim to clarify this based on a unit of measurement for example. This has no weight as a matter of policy relating to Green Belt.
4. *A city of a human scale easily crossed by foot and by bicycle*; - **Not Relevant**  
This relates to restricting sprawl, but is this a difficult measure when defining green belt. Cambridge may be easy to cross by bike and foot, but what evidence is there to suggest it can be concluded that this is down to the impact and or presence of Green Belt? This is also related to the shape and formation of Cambridge City Centre, its transport policies and how new and existing developments can help improve permeability across the City. All of which have nothing to do with the function of the surrounding Green Belt, therefore clearly has no weight as a matter of policy relating to Green Belt.

5. *Topography providing a framework to Cambridge; - Not Relevant*

It is unsure what purpose this relates to in the context of Green Belt assessment. It is not considered that topography can be used to define Green Belt therefore has no weight as a matter of policy relating to Green Belt.

6. *Long distance footpaths and bridleways providing access to the countryside; - Not Relevant*

Access does not provide any relevance to the purpose of the Green Belt, as access should not be a contributing factor to the importance of a site. Protecting the countryside from encroachment relates closely to openness and lack of urbanising influences therefore has no weight as a matter of policy relating to Green Belt.

7. *Key views of Cambridge from the surrounding landscape; - Not Relevant*

Cambridge is defined by its unique views of various historical assets. The test to ensure whether or not a site contributes to key view of Cambridge can be assessed against the NPPF purpose of *to preserve the setting and special character of historic towns*; and, therefore this has no weight as a matter of policy relating to Green Belt.

8. *Significant areas of distinctive and supportive townscape and landscape; - Not Relevant*

The test against the NPPF purpose of *preserving the setting and special character of historic towns* would cover this aspect therefore has no weight as a matter of policy relating to Green Belt.

9. *A soft green edge to the city; - Not Relevant*

Green Belt provides a key function in the approach to a green landscape setting to the outskirts of Cambridge, therefore it is concluded this point is relevant. However, the test against the NPPF purpose of *preserving the setting and special character of historic towns* would cover this aspect therefore has no weight as a matter of policy relating to Green Belt.

10. *Good urban structure with well-designed edges to the city; - Not Relevant*

This relates more about urban design than the character of the Green Belt therefore has no weight as a matter of policy relating to Green Belt.

11. *Green corridors into the city; - Not Relevant*

The terminology of providing green corridors into Cambridge is confusing. Enhancements to main arterial links into and out of Cambridge can provide 'green corridors' therefore the relevance of this to Green Belt assessment is limited. The test against the NPPF purpose of *to prevent neighbouring towns merging into one another*, would cover this aspect therefore has no weight as a matter of policy relating to Green Belt.

**12. *The distribution, physical and visual separation of necklace villages;* - **Not Relevant****

Whilst the Green Belt does support the function of ensuring necklace villages remain distinct and separated from development associated with the fringes of Cambridge, each site plays a varying degree of impact on this issue. Can it be said that every site can provide this function? If the conclusion is no, then how can this be applied to each of the sites. It shows an unbiased approach to the assessment. The test against the NPPF purpose of *to check the unrestricted sprawl of large built-up areas* would cover this aspect therefore has no weight as a matter of policy relating to Green Belt.

**13. *The scale, character, identity and rural setting of the necklace villages;* - **Not Relevant****

Similar to that of point 12, the Green Belt supports the function of ensuring necklace villages retain their scale, character, identity and setting. Is it true that every site can provide this function? If the conclusion is no, then how can this be applied to each of the sites. It shows an unbiased approach to the assessment. The test against the NPPF purpose of *to check the unrestricted sprawl of large built-up areas & to preserve the setting and special character of historic towns* would cover this aspect therefore has no weight as a matter of policy relating to Green Belt.

**14. *Designated sites and areas enriching the setting of Cambridge;* - **Not Relevant****

This has minor relevance to Green Belt assessments, as it can illustrate how a site contributes to setting and character of Cambridge. However, in relation to Green Belt policy, the NPPF makes no distinction on designated landscapes, therefore has no weight as a matter of policy relating to Green Belt.

**15. *Elements and features contributing positively to the character of the landscape setting;* - **Not Relevant****

Although this does have some relevance to Green Belt Assessments, the landscape setting is assumed to be the setting to existing developments and the visual and physical relationship to one another. Can it be said that all the 19 sites surrounding

Cambridge all contain positive elements and features? It should be concluded that the test against the NPPF purpose of *to preserve the setting and special character of historic towns* would cover this aspect therefore has no weight as a matter of policy relating to Green Belt.

**16. A city set in a landscape which retains a strongly rural character; - Not Relevant**

This has some relevance to Green Belt assessments in terms of the idea of protecting countryside. However, in relation to Green Belt policy, the NPPF make no distinction on the types of landscape character and nor does it place any weighting of types of landscapes therefore has no weight as a matter of policy relating to Green Belt.

Whilst we acknowledge that the 19 sites have been assessed against the 5 purposes of Green Belt as contained within the NPPF, the weighting placed on the 16 points of assessment criteria raise questions over their relevance.

Based on the principles defined within the NPPF, land within Green Belt should be examined against all five of the purposes only. Paragraph 80 clearly sets out these 5 purposes, but does not give a hierarchy or weighting to ensure consistent and unbiased assessment can be carried out to all areas of Green Belt. This allows for the application of a clear and transparent assessment which enables sites to be equally assessed for their importance in the role they play as designated Green Belt land.

Therefore, whilst some of the criteria may be relevant to a range of the 19 sites surrounding Cambridge, we would support the Inspector's line of questioning in how relevant can the criteria be to all of the sites around Cambridge.

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