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Real Estate

Cambridge City and South Cambridgeshire Local Plan Examinations

MATTER PM2 – GREEN BELT REVIEW METHODOLGY

On behalf of Grosvenor & USS (ID. 25482)

13 May 2016

Matter PM2 – Green Belt Review Methodology

PM2.1 Does the Cambridge Inner Green Belt Study (November 2015) (RD/MC/30) 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?

Introduction: the work undertaken by Grosvenor / USS

Grosvenor and USS appointed Terence O'Rourke (TOR) to undertake a review of the Cambridge Green Belt in January 2015. This was submitted as part of a Hearing Statement in response to the Cambridge City and South Cambridgeshire District Councils' Inner Green Belt Study, 2012.

Inadequacies concerning methodology were raised at the Local Plan Examination and the robustness of the 2012 Green Belt Study was one of the factors that resulted in the Inspectors adjourning the examination in May 2015.

LDA Design was subsequently commissioned jointly by the Councils in 2015 to prepare an assessment of the Cambridge Inner Green Belt Boundary.

Savills submitted representations on behalf of Grosvenor / USS in January 2016 in response to the LDA 2015 study. These representations raised two main concerns.

1. The report failed to identify the different landscape characteristics in sector 7 and did not divide it into sub areas. Consequently the results of the assessment of the importance of this sector are skewed.

2. The review failed to provide clear criteria that can be used to directly assess how each sector performs against each of the national Green Belt purposes.

In response to these representations, the Council published a Cambridge Inner Green Belt Boundary Supplement, prepared by LDA, in March 2016. This divided sector 7 into sub areas 7.1 and 7.2.

TOR has undertaken a more detailed Green Belt appraisal of sub sector 7.2 on behalf of Grosvenor / USS, in preparation for a specific planning application on this land.

The work undertaken to date has identified that the methodology used in the LDA 2015 Study and the LDA 2016 Supplement has not provided a clear and transparent assessment of how the Green Belt performs against the purpose of including land within it. Consequently, the findings are inaccurate.

Our concerns: classification of sub area 7.2

As stated above, we originally raised concerns that the report had failed to identify the different landscape characteristic in sector 7 and did not divide it into sub areas. This was considered to be a

major anomaly and consequently the conclusions did not accurately identify the level of the importance of the sector to the green belt purposes.

This issue was partially resolved when the Council published the LDA 2016 Supplement subdividing the area into sub areas 7.1 and 7.2.

However, despite the Council accepting that there is a change in character across the site and subdividing the sector, they have not revisited the classification of the character of the sector as a whole. We are concerned that this affects the conclusions of the Councils studies as the change character across the sub area clearly affects its level of importance to the green belt purposes.

Sub area 7.1 contains the consented country park and is predominantly covered with wild flower meadow with parkland tree planting or woodland structure planting. It has an informal network of cycle ways and footpath, contains allotments, areas of formal and informal play along with balancing ponds, viewing corridors and decking and is closely related in character to the adjacent River Cam corridor.

Sub area 7.2 is relatively flat and is currently in arable cultivation, more consistent with the Rhee and Bourn Valley character area. However, following the on-going construction of the consented Trumpington Meadows development, the Glebe Farm development and associated infrastructure, this parcel has strong urban fringe influences. The result is that this area is not experienced as a tranquil, strongly rural landscape but as one that is strongly influenced by built development and M11 corridor and Hauxton Road.

The landscape is experienced as the gateway to Cambridge with strategic view to the satellite settlement of Trumpington to the north west possible from junction 11 of the M11 with Hauxton / Cambridge Road. It has its own identifiable characteristics not shared with the wider Rhee and Bourn Valley character area and should be separately categorised.

Our concerns: approach to applying national purposes of the Green Belt

The LDA 2015 study and the LDA 2016 supplement draw on the baseline studies and analysis to define 16 qualities of Cambridge and its surrounding landscape. These qualities are largely similar to qualities identified in a previous study of the Cambridge Green Belt by LDA in 2002 but have been amended to make reference to the current national green belt purposes.

Paragraph 80 of the NPPF outlines the 5 purposes that the Green Belt serves. In order to establish the degree to which each parcel performs against a particular purposes, the assessment criteria must be clearly and directly related to each one. The LDA 2015 study fails to do this.

As the 16 criteria for assessing the contribution of each sector and sub area are not directly derived from the Green Belt purposes, there are concerns regarding the appropriateness of the assessment made in the LDA 2015 study and LDA 2016 supplement.

Some of the criteria identified are of no relevance to the green belt purposes and therefore we have concerns with the validity of the conclusions of the assessments. The study concludes by finding that it would be unlikely that any development within sector 7 could be accommodated without substantial harm to the Green Belt purposes. It states that development within sub area 7.2 would remove or reduce the distinctive separation between the edge of the city and the M11. However, the separation between a city and motorway bears no relation to the purposes of the Green Belt and therefore is not a relevant consideration.

Conclusion: recommended approach

Classification of sub area 7.2

In order to overcome the concerns regarding the classification of sub area 7.2, it is recommended that sector 7 is reassessed. The conclusions based on the LDA 2015 baseline study and analysis are flawed because it is clear that the arable land does not have the same value as the Country Park. As a result, the value attributed to the existing site is too high and the assessment fails to distinguish the area of low importance in sub area 7.2.

Approach to applying national purposes of the Green Belt

The 16 criteria used to assess the value of the Green Belt do not all directly the national purposes of the Green Belt as set out in the NPPF. In order to overcome these concerns, the assessment criteria should be revised so that the degree to which each parcel performs against a particular green belt purposes can be accurately assessed. The criteria should be limited to the 5 purposes of the NPPF.