Cambridge South

Review of Green Belt Assessment Methodology

Lands Improvement Holdings plc and

Pigeon Investment Management Ltd

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CONTENTS

SLR

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1.0   EXECUTIVE SUMMARY

- **SLR Consulting Ltd (SLR) was asked to review the LDA Inner Green Belt Study (2015) in the context of the Inspector's questions regarding the clarity and transparency of this report (Matter PM2).**

- **Jeremy Smith of SLR has reviewed the LDA report and has concluded that it does not offer a clear and transparent assessment of how the Cambridge Green Belt performs against Green Belt functions identified in the NPPF.**

- **The baseline assessments do not logically support the definition of the sub-areas, nor do they always support the qualities.**

- **The assessment areas and sub-areas are often large scale, and thus miss subtleties within areas.**

- **The qualities do not clearly relate to Green Belt purposes, and do not always provide a clear way of differentiating areas or sub-areas.**

2.0   INTRODUCTION

Jeremy Smith of SLR Consulting Ltd (SLR) was asked by Lands Improvement Holdings (LIH) and Pigeon Investment Management (Pigeon) to consider issues raised by the Inspector in the Local Plan Examinations for Cambridge City and South Cambridgeshire (Matter PM2 – Green Belt Review Methodology), which is quoted in full below:

"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) The identification of qualities/assessment criteria – are all 16 clearly related to Green Belt purposes.

In carrying out this review a site visit has been made to land between Great Shelford and Trumpington, since this area is included within the LDA 2015 Review and is therefore used to test the application of the LDA methodology, (area 8.1, see figure 2, drawing reference 4732_002, in the LDA report).

SLR includes a landscape practice of 55 landscape architects with offices throughout the UK, including Cambridge. Jeremy Smith was the founder member of SLR's landscape team. He is a chartered landscape architect with 25 years of experience who has carried out Green Belt reviews of sites throughout the UK and has acted as an expert witness on landscape, visual and Green Belt matters at numerous inquiries and hearings.

I have not repeated Green Belt policy from the NPPF, (or Local Plans), as this is set out in Core Document RD/NP/010.

3.0   REVIEW OF THE METHODOLOGY USED IN THE CAMBRIDGE INNER GREEN BELT BOUNDARY STUDY (NOVEMBER 2015)

3.1   Structure of the LDA 2015 Green Belt Review

It is acknowledged that there is no recognised methodology for Green Belt review, and consequently different practitioners follow different approaches. However, one fundamental requirement of all methodologies is that the assessment criteria relate clearly and transparently to the purposes of the Green Belt, as set out in paragraph 80 of the NPPF.

Section 3.2 of the LDA 2015 Green Belt Review sets out the structure of the methodology that is used, which includes the following stages:

1. Agreement of the study area;
2. Identification of sectors and sub-areas;
3. Baseline studies and analysis
4. Identification of qualities relevant to Green Belt purposes;
5. Assessment of sectors.

3.2   Identification of Sectors and Sub-Areas

The identification of sectors and sub-areas (stage 2) uses existing geographical elements, such as roads, rivers or field boundaries, to define edges. Paragraph 3.2.5 states that the sectors are defined on a "*simple spatial basis*", meaning that they do not reflect variations in land-use, character or context. Sub-areas are then used in order to define changes in characteristics which would affect the application of the assessment criteria.

As Helen Thompson identifies in her January 2016 Objection to Proposed Modifications relating to Green Belt Issues, (see paragraph 3.6) it is notable that the sectors and sub-areas are larger than the areas used in the Councils' 2012 study. This large scale approach means that variations in character and visibility within sectors are missed, and consequently smaller parcels of land that could have the potential for development are overlooked.

The March 2016 Supplement to the LDA Review tries to address this point by introducing additional words such as "depending on its extent" (see Item 1): but if anything this only emphasises the point that the initial assessment units were too large.

3.3   Baseline Studies

The baseline studies (stage 3) include studies of the form and scale of the city, its historical development, landscape and townscape character, the experience of approaching the city and the perception of the city from the surrounding landscape.

The historical development of the city is summarised in section 4.2, and is closely linked with the townscape character assessment in section 4.7. Townscape (and historic development of the city) is then summarised on figure 7. It is noticeable from figure 7 that the historic core (in brown) is small in relation to the rest of the city, and that there has been significant expansion of the settlement since the start of the 20th century. This does not logically support some of the qualities of Cambridge set out in section 5.0 of the report (Qualities Relevant to Green Belt Purposes), for example "a large historic core relative to the size of the city as a whole".

The visual assessment indicates that the edges to the city are of varying character (see for example paragraph 4.10.8) with a "generally soft green edge to the west" and "mixed edges

elsewhere". Figure 9 provides further, slightly contradicting information, illustrating that edges to the south west, south, south east and east are "mixed urban" in character, with "soft" edges to the west, north east and north. This contrasts with the statement at paragraph 5.2.38 that "*a distinctive feature of Cambridge is its appearance as a densely treed city with a soft green edge*". It is also included as one of the qualities which distinguish the city in section 5.0 of the report: "a soft green edge". Once more the baseline studies are therefore not logically informing the assessment stages of the LDA Review.

The landscape character assessment, which is one of the most important tools for assessing how parcels of land perform the Green Belt functions, is summarised in figure 8. It is notable that this is a high level classification which therefore makes very little differentiation in character over large areas of the study area. For example, there is no differentiation between areas that are already visually influenced by the urban edge or by infrastructure, compared with those that are more remote or tranquil, and yet the visual influence of existing structures is an important factor when determining the potential sensitivity of a site to encroachment or sprawl.

It is also notable that there is no clear relationship between the boundaries on the landscape character plan and the sub-area boundaries illustrated on figure 2, despite the assertion in paragraph 3.2.5 that the sub-areas take account of changes in character. For example, the boundary between character areas 4B and 4C is not reflected in the boundary between areas 8.1 and 8.2, nor is the boundary between 9.1 and 9.2 supported by the landscape character plan, or 12.1 and 12.2 and 13.1 and 13.2.

3.4   Identification of Qualities

16 qualities relevant to the purposes of the Green Belt have been identified in stage 4. It is stated at paragraph 5.1.2 that the qualities are drawn from LDA's 2002 study, or in other previous studies and policy documents.

As has been noted above, some of the qualities identified do not logically flow from the baseline studies.

Several of these qualities are also similar or overlap to some extent: for example "large historic core relative to the size of the city as a whole", is very similar to "city focused on the historic core", and "a soft green edge to the city" overlaps with "well-designed edges to the city". Similarly "distribution, physical and visual separation of the necklace villages" overlaps considerably with "the scale, character, identity and rural setting of the necklace villages". This does not aid the clarity or transparency of the assessment.

It is also not always clear how the qualities relate to the NPPF purposes of the Green Belt: for example the table on pages 59 and 60 states that "a city focused on the historic core" is relevant to setting of historic towns: and yet the supporting text (e.g. 5.2.10) states that if the city grows too large there will be subsidiary local centres that will compete with the historic centre – which seems to indicate that the concern is sprawl, as well as preserving the setting and special character of towns.

There is a further lack of clarity with "long distance footpaths and bridleways and footpaths providing access to the countryside". The presence of such features is stated within the table to be a measure of preserving setting, and yet paragraph 5.2.27 states (correctly) that these are key locations for obtaining views of Cambridge: it therefore logically follows that any sector which contains such routes should therefore be more sensitive to sprawl or encroachment, and yet these functions are not said to be associated with this quality.

The table also states that "elements and features contributing to the character and structure of the landscape" is a component of the character and setting of Cambridge, and is also relevant when defining the risk of sprawl. But the presence of elements such as waterways, hedgerows and hills can also be an important consideration when defining the risk of encroachment, since they can offer visual containment – and yet this is not highlighted in the table.

Some qualities are very difficult to apply in a way that can differentiate different sectors or sub-areas. For example, "a city of a human scale" is explained in paragraph 5.2.22 as meaning that "ensuring that Cambridge does not expand significantly further". On this basis any development within the Inner Green Belt could be said to be providing no more than marginal growth and not expanding the city significantly further: that would certainly seem to accord with the fact that recent allocations have been made on the edge of the city. Similarly "large historic core relative to the size of the city as a whole" and "a city focused on the historic core" could be said to either preclude or allow development in any location in the inner Green Belt.

Some of the qualities mentioned could be created within a relatively short timescale, and are therefore not permanent, or long-term, characteristics upon which Green Belt judgements can be based. For example, "a soft green edge to the city" could be produced with appropriate planting over a relatively small area of land within 10 to 15 years, and "well-designed edges to the city" could similarly be produced by appropriate development and planting within a short timescale.

4.0 RESPONSE TO THE INSPECTOR'S QUESTIONS

- **Summary: having reviewed the LDA 2015 Green Belt Review I have concluded that that this does not offer a clear and transparent assessment of how the Cambridge Green Belt performs against Green Belt functions identified in the NPPF.**

- **Baseline Assessments:** these do not logically inform the definition of the sectors and sub-areas, since the boundaries of character areas do not match the sub-area boundaries. The high level nature of the landscape character assessment, and the visual assessment, also means that important subtleties across sub-areas are missed. Nor do the baseline assessments support all of the qualities.

- **The Identification of Areas for Assessment:** in addition to the fact that these do not flow logically from the baseline information, the sectors and sub-areas are generally large (larger than in the Councils' 2012 study), and this too means that it is more difficult to capture variations in Green Belt function.

- **The Identification of Qualities/Assessment Criteria:** use of the 16 special qualities to assess Green Belt functions is fraught with difficulties. Some of the qualities overlap, and some do not seem to clearly relate to particular Green Belt functions, or are being applied to the wrong Green Belt functions. As has been noted some do not seem to flow logically from the baseline assessment. Some offer no way of differentiating Green Belt sites on the settlement edge, and others are characteristics which could be created within a relatively short timescale, and are therefore of relatively minor significance in the assessment of Green Belt function.

- **The measures required to make the assessment process sound should therefore include the following steps:**

   (a) Further study within the baseline assessments to provide a more detailed appraisal of landscape character, visual effects of the existing settlement edge, and views to and from approaches to the city.
   (b) An assessment using smaller sub-sectors which more accurately reflect the variation in landscape character and views.
   (c) A thorough review of the qualities to ensure that only those that logically relate to the NPPF functions of the Green Belt are used, followed by a clear and transparent explanation of how each quality relates to the functions.

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