Green Belt Review & Critique of Cambridge South

Lands Improvement Holdings Limited, Pigeon Land, Jesus College and the Pemberton Trust

Cambridge South

October 2013
Quality Assurance

Site name: Cambridge South

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Prepared by: Helen Thompson MPhil MSc BSc(Hons) CMLI MRTPi AIEMA
Signed:  
Date 14th October, 2013

Reviewed by: Philip Ayres MIHort CMLI Dip LA Dip Hort
Signed  
Date 14th October, 2013
Lands Improvement Holdings Limited and Pigeon Land  
Cambridge South  
October 2013

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Executive Summary

The following points are made.

Green Belt boundaries should only be altered in exceptional circumstance, through the preparation or review of the Local Plan.

Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC) have identified exceptional circumstances and propose to release six sites from the Green Belt as Site Options.

CCC undertook an Appraisal of the Inner Green Belt in May 2012 based on the Cambridge City Council Inner Green Belt Boundary Study 2002. There are discrepancies between these two documents.

CCC and SCDC jointly undertook a Green Belt Study in December 2012 based on the Cambridge City Council Inner Green Belt Boundary Study 2002. There were differences to the approach to these previous studies and discrepancies are identified, namely:

- different areas assessed;
- different values attributed to Green Belt purposes;
- inconsistency in dealing with the assessment of ‘Importance to Green Belt’ for Cambridge South;
- lack of clarity in the assessment of Significance of Development; and
- lack of consistency in the assessment of Significance of Development for Cambridge South.

The results are skewed against Cambridge South. This site, bounded by the M11, Hauxton Road and Addenbrooke’s Road on three sides, is assessed as being of equal importance to the purpose of the Green Belt as the iconic Grantchester Meadows, which at face value seems improbable.

The lack of consistency and clarity together with the importance of the Councils’ findings on the Green Belt prompted the review contained in this report, which is based on the Councils’ assessment methodology to allow comparison. The review undertaken here finds considerable discrepancies contained in the Councils’ study and that development could take place on Cambridge South without significant harm to the purpose of including land in the Green Belt. Hauxton Road, the M11 and the river corridor would provide boundaries that will endure and are likely to be permanent.

The edge of Cambridge is the second most sustainable location to provide development. Exceptional circumstances exist to provide for development need in the most sustainable locations. It is important that any review of the Green Belt is robust and in depth so that sites which could be released from the Green Belt without significant harm to the Green Belt purposes are identified.
Any review of Green Belt boundaries should take account of the need to promote sustainable patterns of growth. The consequences for the factors required to deliver sustainable development as directed by the National Planning Policy Framework (NPPF) should be considered alongside Green Belt issues to determine where development should go. Whilst the NPPF gives weight to the preservation of the Green Belt, there is no policy principle within the National Planning Policy Framework that the overall balance of sustainability should not lead to a review of the Green Belt.
1 **Introduction**

1.1 Bidwells has been appointed by Lands Improvement Holdings Limited, Pigeon Land, Jesus College and the Pemberton Trust (from now on referred to as the site ‘Promoters’) to review the findings of South Cambridgeshire District Council and Cambridge City Council (CCC) with regard to the Green Belt land associated with Cambridge South – the site. Cambridge South is identified in Figure 1.

1.2 South Cambridgeshire District Council (SCDC) is currently consulting upon:
- The Local Plan 2011-2031 Proposed Submission; and
- Sustainability Appraisal (SA) which accompanies the Local Plan Proposed Submission.

1.3 The Proposer has submitted responses to previous rounds of consultation on Green Belt issues, namely:
- Green Belt Critique February 2013.

1.4 This report has the following key purposes:
- to critique the 2012 Appraisal of the Inner Green Belt produced by Cambridge City Council;
- to critique the joint Green Belt review undertaken by Cambridge City Council and South Cambridgeshire District Council in December 2012;
- to critique the relationship between the Councils’ Green Belt review and the Pro forma used for the edge of Cambridge sites which assesses the purposes of the Green Belt;
- to undertake a review of Cambridge South according to the assessment methodology used by Councils in their joint study; and
- to consider whether Cambridge South is of long term importance to Green Belt purposes, and identify if, and where, development could occur without significant undue harm to the purpose of the Green Belt.

1.5 The main findings of the report are listed in the Executive Summary. The following report expands on the points made in the Executive Summary.

1.6 The report is set out as follows:
- Executive Summary;
- Introduction;
- Legislative and Planning Considerations;
- Plan making up to this point;
1.7 Background information is set out in the Appendices.

1. Appendix 1 sets out the Development Strategy;
2. Appendix 2 sets out information on the Green Belt;
3. Appendix 3 describes previous Green Belt Reviews;
4. Appendix 4 sets out a summary of our previous representations; and
5. Appendix 5 sets out the relationship between the Pro forma and the Green Belt Review.
2 Legislative and Planning Considerations

National Planning Policy

2.1 The National Planning Policy Framework (NPPF), published in 2012, states the purpose of planning is to help achieve sustainable development. There are thirteen factors to consider when planning for sustainable development, of which Green Belt is one.

2.2 The Government attaches great importance to Green Belts as outlined in the NPPF but there is no policy principle in the NPPF that the sustainability balance of all thirteen factors should not lead to a review of the Green Belt.

2.3 NPPF paragraph 79 states “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

2.4 NPPF paragraph 80 states that the “Green Belt serves five purposes:

- to check the unrestricted sprawl of large, built up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.

2.5 NPPF paragraph 83 states that “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”.

2.6 The exceptional circumstance acknowledged by the Councils is the delivery of the development need in the second most sustainable location in the spatial development strategy hierarchy. Following on from development within the built area of Cambridge, development on the edge of Cambridge is the next most sustainable location. It is the most sustainable location for the delivery of development for South Cambridgeshire.

2.7 NPPF paragraph 84 states that “When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns
and village inset within the Green Belt or towards locations beyond the outer Green Belt boundary”.

2.8 NPPF paragraph 85 states that ‘When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are easily recognisable and likely to be permanent”.

Local Planning Policy

2.9 The Proposed Submission South Cambridgeshire Local Plan sets out their proposed Green Belt Policy as follows:

Policy S/4: Cambridge Green Belt

A Green Belt will be maintained around Cambridge that will define the extent of the urban area. The detailed boundaries of the Green Belt in South Cambridgeshire are defined on the Policies Map, which includes some minor revisions to the inner boundary of the Green Belt around Cambridge and to the boundaries around some inset villages.

2.10 Paragraph 2.29 sets out the established purposes which are the same as those of Cambridge City. In addition, South Cambridgeshire describes a number of factors which define the special character of Cambridge and its setting.

2.11 The inner Green Belt boundary and the Broad Location sites are also within South Cambridgeshire’s administrative boundary.

2.12 Cambridge Local Plan – Proposed Submission sets out the proposed policy as follows:

Policy 4: The Cambridge Green Belt
The extent of the Cambridge Green Belt within the administrative area of Cambridge City Council is set out in the policies map. New development in the Green Belt will not be approved except in very special circumstances, in line with Green Belt Policy in the National Planning Policy Framework.

2.13 The relationship between the National and local Cambridge Green Belt purposes and the special factors are set out as follow:

Table 1: Relationship between the national and local Green Belt purposes.

<table>
<thead>
<tr>
<th>National Green Belt Purposes</th>
<th>Cambridge Green Belt Purposes (SCDC and CCC)</th>
<th>SCDC factors which define the special character of Cambridge</th>
</tr>
</thead>
<tbody>
<tr>
<td>To check the unrestricted sprawl of large built-up areas.</td>
<td>Preserve the unique character of Cambridge as a compact, dynamic City with a thriving historic centre.</td>
<td>Key views of Cambridge from the surrounding countryside.</td>
</tr>
<tr>
<td>To prevent neighbouring towns merging into one another.</td>
<td>Maintain and enhance the quality of its setting.</td>
<td>A soft green edge.</td>
</tr>
<tr>
<td>To assist in safeguarding the countryside from encroachment.</td>
<td>Prevent communities in the environs of Cambridge from merging into one another and with the City.</td>
<td>A distinctive urban edge.</td>
</tr>
<tr>
<td>To preserve the setting and special character of historic towns.</td>
<td></td>
<td>Green corridors penetrating into the City.</td>
</tr>
<tr>
<td>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</td>
<td></td>
<td>Designated sites and other features contributing positively to the character of the landscape setting.</td>
</tr>
</tbody>
</table>

|                                                                 |                                                                                                               | The distribution, physical separation, setting, scale and character of Green Belt villages. |
|                                                                 |                                                                                                               | A landscape that retains a strong rural character.                                                                             |

2.14 This relationship is used in the review and Pro forma undertaken by the local authorities.
3 South Cambridgeshire District Council Local Plan – Plan making up to this point

Issues and Options Part 1

3.1 During 2012 both SCDC and CCC consulted upon their respective emerging local plans which included policy options and approaches for the Green Belt and an assessment of ten ‘Broad Locations’ on the edge of Cambridge.

3.2 Cambridge South was identified as Broad Location 5: Land South of Addenbrooke’s Road.

Issues and Options 2 Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge

3.3 At the Issues and Options 2 Stage, SCDC and CCC undertook a Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge.

3.4 The following points are relevant:

- Paragraph 7.5 states the purposes of the Green Belt particular to Cambridge:
  - to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
  - to maintain and enhance the quality of its setting; and
  - to prevent communities in the environs of Cambridge from merging into one another and with the City.

- Paragraph 7.14, third bullet states that “views of the City will be foreshortened as the edge advances into the rural surroundings sometimes making the foreground noticeably more important for the setting of the City”;

- Paragraph 7.15 states “where the City is viewed from higher ground or generally has open aspects, or where the urban edge is close to the City centre are more sensitive and cannot accommodate change easily. Areas of the City that have level views and where the edge has mixed foreground can sometimes accommodate change more easily. On a comparative basis these areas have a lesser importance to the setting of the City and to the purposes of the Green Belt”;

- Paragraph 7.17 states that “there needs to be an appropriately sized area of land retained as Green Belt between any future urban edge and the view/vantage point to still provide a green foreground setting to the City. This green foreground should be retained as Green Belt”.

3.5 To inform the decisions, a Green Belt Review was undertaken. At around the same time a Pro forma which contained both Sustainability Objectives, Topics and Issues as well as Green Belt criteria and other planning and delivery criteria was used to assess areas within the Broad
Locations. The findings of the studies on the Green Belt fed into the Issues and Options 2 Part 1.

3.6 The Councils consider that given the level of need for homes and jobs, exceptional circumstances exist to justify the release of six sites from the Green Belt as not all the Green Belt boundaries continue to be appropriate. The six sites are the proposed ‘Site Options’.

3.7 Appendix 2 of the Issues and Options 2 Part 1 document sets out a map and a Summary Assessment of Green Belt Sites which were rejected.

3.8 The Pro forma contained nine Green Belt criteria and a summary of Green Belt importance. It is not clear how this Pro forma assessment relates to the Green Belt Study as the criteria are different. Nor is it clear which informed the rejection of sites. This leads to inconsistency in the approach.

3.9 For example, the Pro forma finds that site SCF105 (a large area of Broad Location 5) is RED for the criterion ‘To preserve the unique character of Cambridge as a compact and dynamic City with a thriving historic core’. Site SCF105 in the Pro forma is broadly equivalent to Sector 8.1 of the 2012 Green Belt Study where the highest value for the ‘Importance to Character’ is given as Medium. The relationship between the two is unclear – or which assessment was used to reject the site.

South Cambridgeshire Local Plan – Proposed Submission

3.10 The South Cambridgeshire Local Plan – Proposed Submission is currently being consulted upon. This document sets out the proposed Spatial Strategy carrying through the Site Options on the edge of Cambridge previously proposed for Green Belt release.

3.11 It describes that prior to 1999, the development of Cambridge was constrained by the Green Belt. It continues that “one of the effects of this constraint was that housing development that would otherwise have taken place in Cambridge was dispersed to towns and villages beyond the outer boundary of the Green Belt, with people commuting back to jobs in Cambridge contributing to congestion, greenhouse gas emissions, air quality problems and other quality of life issues”.

3.12 The Cambridge Local Plan (2006) and South Cambridgeshire Local Development Framework (adopted between 2007 and 2010) released significant land from the Cambridge Green Belt and allocated a number of urban extensions to the City. Figure 2 indicates the areas of land which were released from the Green Belt.

3.13 The land released to the east of Cambridge is part of the Cambridge East Area Action Plan (AAP) comprising 10,000-12,000 new homes. However, Marshall/Cambridge Airport has stated their intention to stay, with only land under their control north of Newmarket Road (mostly
in South Cambridgeshire) now coming forward for development. CCC proposes to safeguard this land as a long term strategic reserve outside the Green Belt. It should be noted that this is the largest tract of land released in 2006 and it will remain open.
4. Green Belt Reviews used to inform the new Plan

4.1 The Councils (SCDC and CCC jointly) state that the current Green Belt boundary around the City was established with the expectation that its boundaries could endure to the end of the plan period of 2016 and beyond. The Councils concede that circumstances have changed so far that Cambridge East, released from the Green Belt in 2006 for around 12,000 homes, will no longer be coming forward in this, or the next, plan period.

4.2 Both SCDC and CCC consider that there are exceptional circumstances to consider further land releases from the Green Belt. SCDC states that “given the level of need for homes and jobs, it is considered that exceptional circumstances exist to justify their release”.

4.3 A Green Belt review was undertaken by Cambridge City Council in May 2012 and following this a joint review by SCDC and CCC in December 2012. The stated aim of this later review was to provide detailed and up to date evidence on the potential impact of further releases on the purposes of the Green Belt and the setting of the City.

4.4 They find that most of the inner Green Belt continues to be of High importance for Green Belt purposes and specifically important to protect the setting and special character of Cambridge as a compact historic city. The Councils also find that the adjacent areas to the previous releases have gained a greater value to the purposes of the Green Belt.

4.5 This joint review found that a few small areas on the edge of Cambridge could not be considered of long term importance to Green Belt purposes. These are the proposed Site Options on the edge of Cambridge.

2012 Appraisal of the Inner Green Belt undertaken by Cambridge City Council

4.6 This document describes that the current development strategy stems as far back as 1999 with the work undertaken by Cambridge Futures amongst others. The 2003 Cambridgeshire and Peterborough Structure Plan identified broad locations to be released from the Green Belt and the strategy was given effect through the Cambridge Local Plan, the South Cambridgeshire Local Development Framework and the joint Area Action Plans for North West Cambridge and Cambridge East.

4.7 In order to feed in to this process, two studies in particular were undertaken at that time:

- Inner Green Belt Boundary Study 2002, Cambridge City Council; and

4.8 More information on these earlier studies is given in Appendix 3.
4.9 The report describes how the methodology was based on the CCC document of 2002, albeit much simplified because “the appraisal does not concern itself with specific sectors with potential for further release”.

4.10 The 2012 Appraisal carried out the broad appraisal of the inner Green Belt boundary areas in the context of the recent land releases and how these releases have affected the revised Green Belt boundary. The appraisal claims to specifically reconsider zones of land immediately adjacent to the City in terms of the principles and function of the Green Belt. It does not identify specific areas with potential for further release.

4.11 It describes how the appraisal assumed that areas as defined in the Cambridge Landscape Character Assessment 2003 (adopted as material consideration in 2003 to be updated) as essential to the character and setting of Cambridge, should be protected. These areas are identified as ‘Defining Character’, an example of which is the River Cam corridor. Changes to the Green Belt in these ‘Defining Character’ areas would compromise the setting and character of the City and were therefore treated as sacrosanct.

4.12 Areas which were identified as ‘Supporting Character’ in the Cambridge Landscape Character Assessment are of varying value to the purposes of the Green Belt. This appraisal states that it is confined to those areas of Supporting Character with regard to importance to Green Belt purpose.

4.13 In addition to the five purposes of including land in the Green Belt listed in the NPPF, four additional criteria specific to Cambridge are applied as follows:

**Purpose: provide green separation between existing villages and any urban edge of Cambridge.** An assessment was made of each sector by using maps and aerial photographs and by considering various factors such as distance between settlements, existing edges, trees and vegetation cover, and perceived risk of one settlement merging into another.

**Purpose: preserve the setting and special character of Cambridge.** The character and setting of Cambridge are described in the Cambridge Landscape Character Assessment.

**Purpose: ensure the protection of green corridors running from open countryside into the urban area.** The existing Green Belt extends along green corridors into and close to the City centre. These corridors should remain protected to preserve the setting of the City.

**Purpose: a vision of the City and the qualities to be safeguarded.** The qualities of the City are described in the Cambridge Landscape Character Assessment which in turn informed the vision for the future of development of Cambridge.

4.14 The appraisal undertakes a strategic overview of the Inner Green Belt Area and an assessment of zones in the inner Green Belt area. Figure 3 reproduces Plan 1 of that assessment.
Cambridge South lies within Zone 7 – Land east of Hauxton Road and west of Shelford Road.

CCC describe it as follows:

- the land is open and exposed and is mainly on high, flat ground which falls away slightly to the south towards the M11;
- there is a plateau area immediately to the south west of Shelford Road (running approximately parallel to the road);
- a few mature hedgerows dissect the area.

Figure 3, shows land of lower importance to the Green Belt running approximately parallel to Shelford Road to the north east of the minor ridge.

This plan also indicates ‘Elevated Views’ and ‘Flat Views’ which refers back to the Cambridge Green Belt Study, September 2002, South Cambridgeshire District Council. The views describe edge characteristics as follows:

- Level views, with a countryside foreground and a generally soft urban edge (the west side of Cambridge and the north east Cam corridor, including views from the M11, northern and southern railway approaches and sections of the A14);
- Elevated views with a countryside foreground and a generally soft urban edge (from the Gog Magog Hills to the south east of Cambridge);
- Level views with little/no foreground and a generally hard edge (housing and science park as seen from the A14 on the north side of Cambridge);
- Level views with a mixed foreground and a mixed urban edge (the eastern side of Cambridge, which is dominated by the Airport).

No views are identified close to the site.

We consider that the edge characteristics of Cambridge South are level views with mixed foreground. Whilst it has some green foreground it has a generally hard edge (M11, Hauxton Road and Addenbrooke’s Road).

The appraisal states that “the small area of land immediately to the west of Shelford Road is more discrete being slightly lower than the highest part of the area”. In Figure 3 CCC refers to this area as an “Area of Lower Importance to the Green Belt”.

Critique of the Councils’ joint 2012 Inner Green Belt Boundary Study December 2012

4.22 The purpose of this second, joint review was to provide an up to date evidence base of both Councils’ new Local Plans. The Councils state it is consistent with the broad appraisal of the Inner Green Belt boundary that CCC undertook in May 2012.

4.23 The methodology of this Study is set out and follows a similar methodology as the 2002 City Council study. The same purposes specific to Cambridge were used in both appraisals.

4.24 Tracts of land of different sizes are assessed. Whilst the December 2012 report is silent, the 2002 Study upon which it is based acknowledges in paragraph 4.1.6 “Assessments were made on a site-by-site basis of the importance to the Green Belt purpose of setting, character and also of separation and described as Very High, High, Medium, Minor and Negligible. The worth to Green Belt function was attributed as the highest value”. As landscape varies, and it is likely to vary more over larger areas, high values could be attributed to large sites which contain only a small portion of high value land.

4.25 The 2002 study continues under 4.1.7 “A value of importance for immediate setting and character of Cambridge is given for each area, ranging from Very High to Negligible. The highest value is used to extrapolate importance to Green Belt purpose and then used along with the magnitude of effect to evaluate the potential significance of development”. This means that the attribute of Importance to Green Belt takes the worst case scenario at each of these two stages. It is likely that there are a considerable number of land parcels assessed which contain only relatively small areas which are of High or above Importance to the Green Belt.

4.26 In the joint study, Cambridge South lies in Sector 8. The plan accompanying the report is reproduced here as Figure 4. Cambridge South comprises four areas: 1, 2, 3 and 4. These have been reproduced in Figure 5 at a larger scale for ease of comparison.

4.27 There are some differences in the parameters upon which the assessment was made however. The land parcels considered for Cambridge South in 2012 were, in general, larger than the areas considered in 2002. We have already shown how this can bias the assessment as a large tract of land could be attributed as ‘High’ for example and yet contain only a small area of High value land. As the 2012 uses larger areas, there is likely to be a greater probability of this happening.

4.28 Step 5 of the 2012 methodology states that ‘if there were notable variations in the assessment of areas, consideration was given to whether the area should be further subdivided and assessed separately’. The different values attributed to the 2002 study should have raised some questions about Sector 8 Area 1 which would warn the evaluators there was a likelihood of variation across such a large area. The evaluation should have been further subdivided and assessed separately as the methodology asserts.
4.29 It is of some note that the area of study in the 2012 Study was extended beyond that of the May 2012 appraisal and the previous 2002 study by a considerable extent. The Councils state “that the potential effect of changing the Green Belt boundary, and for development to change the special character of Cambridge and its setting, has more direct and profound implications close to Cambridge and between Cambridge and its ring of necklace villages”. Even so, the land stretching out between Teversham to Fulbourn was included in the assessment and by the Council’s own conclusion will have a direct and profound implication on the relationship between Cambridge and at least one of its ring of necklace villages.

4.30 The criteria used in all the assessments are relevant when areas close to Cambridge are considered. Generally speaking, areas further away from the City have less effect on the historic setting and the vision of the City and the qualities to be safeguarded than areas closer to Cambridge. However, for areas further removed from Cambridge, the other purposes of Green Belt land become increasingly relevant and should be added to the assessment criteria. These are ‘to check the unrestricted sprawl of large built up areas’ and ‘safeguarding the countryside from development’. This large extension has not been evaluated on a level playing field with the edge of Cambridge sites.

4.31 The areas used for the 2012 study are different from the land parcels used in the 2002 study and therefore it is very difficult to draw comparisons.

4.32 In the 2012 Study Sector 8.1 is described as ‘Very High’ significance. This is the same value as areas along the river corridor to the south west including Grantchester Meadows, and west Cambridge – areas which are described by the Cambridge Landscape Character Assessment 2003 as ‘sacrosanct’. Upon consideration, it does not seem plausible that the area between the motorway junction and the new Addenbrooke’s Road and urban edge is as important as Grantchester Meadows and other areas in the south west and west with views where the skyline of Cambridge can be seen in its setting.

4.33 Indeed, there would appear to be some anomaly as to how the Council has reconciled the value of Importance to Green Belt. In most other areas ‘Importance to the Green Belt’ equates to the highest value of the criteria ‘Importance to Setting’; Importance to Character’; ‘Importance to Physical Separation, Distribution, Setting, Scale and Character of Green Belt Villages’; and ‘Importance to ‘Character’ as the stated methodology for the 2002 Study and implied in the 2012 Study. For Sector 8.1, the highest value of these criteria is ‘High’ and therefore the value of Importance to Green Belt should be ‘High’, not ‘Very High’ as the Councils have determined. It seems more realistic that Sector 8.1 is not ‘Very High’ as this is equivalent to some of the iconic locations in Cambridge such as Grantchester Meadows. Cambridge South is not identified as ‘Defining Character’ as is Grantchester Meadows which is considered as sacrosanct and which is determined as ‘Very High’ importance.
Sectors 8.2, 8.3 and 8.4 ‘Importance to Green Belt’ values are also described as higher than the highest Importance value – even though these areas are part of larger areas described in the earlier May 2012 appraisal as of ‘Lower Importance’. Applying the same reasoning to these sectors as we have outlined above gives different, lower values for ‘Importance to Green Belt’ for Sector 8 based on the Council’s own assessment methodology. The values for the areas would be:

- Sector 8.1 High (rather than ‘Very High’ in the joint 2012 report)
- Sector 8.2 Low (rather than ‘Medium’ in the joint 2012 report)
- Sector 8.3 Low (rather than ‘Medium’ in the joint 2012 report)
- Sector 8.4 Low (rather than ‘Medium’ in the joint 2012 report).

These values are more consistent with previous studies.

The Councils make the following general points about Sector 8:

- significant views from the south and west;
- well defined and managed hedgerows;
- soft green edge;
- abuts river corridor; and
- 800m to new Clay Farm green corridor.

Plan 3 of the 2012 Study is reproduced here as Figure 6. Two setting views are indicated, one from the roundabout junction of Hauxton Road with the M11 and the other from Hauxton Road. It should be noted that the view from the roundabout junction is only ever likely to be seen by car passengers over their shoulder – the car driver will be facing in the wrong direction. The view indicated from Hauxton Road is directed away from Cambridge towards Great Shelford.

The Councils have chosen to represent the Significance of Development on the Green Belt in their plan – reproduced here as Figure 4. This is not the same as the Importance to the Green Belt. Significance is a value extrapolated from the ‘Sensitivity for Immediate Setting and Character of Cambridge’ and ‘Magnitude of Effect of a Development Proposal’ as indicated in Table 1, the Significance Matrix of the 2012 report. What the ‘Sensitivity for Immediate Setting and Character of Cambridge’ is we can only assume – we assume it to be the ‘Importance to Green Belt’ value.

Following through the assessment of Sector 8.2 for example, the ‘Importance to the Green Belt’ is given as Medium. The Significance of Development on the Green Belt is given as High. To achieve a High significance would mean the ‘Magnitude of Effect of the Development Proposals’ is Very High. However, the Councils agree that 8.2 is located adjacent to the ribbon
of development along Shelford Road and lies to the north of a ridge of land where it is shielded from long views from the south. This means that the site is largely obscured. It is therefore difficult to understand why the Magnitude of Effect is considered so high especially when compared with Sector 12 Area 1 for example, the development of which we consider would have greater magnitude but the Council considers this to have a lower magnitude. This anomaly is also carried across Sector 8 areas 1, and 4.

4.40 The correction of these discrepancies within the Council's assessment, on its own, makes the development of Sector 8.2, 8.3 and 8.4 no more detrimental to the purpose of including land in the Green Belt than the Site Options which the Councils are proposing to release from the Green Belt for development.
The Need for a Robust Green Belt Review

4.41 The Inner Green Belt Boundary Study 2002 was carried out “to assist in identifying sites that could accommodate growth close to Cambridge” and “its fundamental purpose is as an in-house document, carried out to guide the Council’s view on potential development sites at that time”.

4.42 The purpose of the joint 2012 Inner Green Belt Boundary Study on the other hand “is to provide an up to date evidence base for both Councils’ new Local Plans. In particular it will help the Councils reach a view on whether there are specific areas of land that could be considered for release from the Green Belt and allocated for development to meet identified needs, without significant harm to Green Belt purposes”.

4.43 The brief for the two studies, separated by ten years, was therefore quite different. The 2002 Boundary Study set out to identify sites as directed by the Regional Planning Guidance 2000, when the previous dispersed pattern of growth was determined to be unsustainable and the local authorities were directed to plan for growth in more sustainable locations close to Cambridge. The information fed into and helped inform the Cambridgeshire and Peterborough Structure Plan 2003.

4.44 The brief for the 2012 joint Study set out to review the capacity of the Green Belt. The need to deliver sustainable development was not of consequence.

4.45 The sequence of sustainable development has not changed, it is:

- within the urban area of Cambridge;
- on the edge of Cambridge;
- in the new town of Northstowe; and
- in the market towns and better served villages in South Cambridgeshire.

4.46 SCDC finds that “most of the inner Green Belt continues to be of high importance for Green Belt purposes and specifically important to protect the setting and special character of Cambridge as a compact historic city. The adjacent areas to the previous releases are also considered to have gained a greater value to the purposes of the Green Belt”.

4.47 It is not clear how the Green Belt has gained added value. The NPPF is clear about the purpose of including land in the Green Belt, there is no ‘added value’ implied. The important attributes of setting of the City are defined by the Cambridge Landscape Character Assessment 2002 as ‘Defining Character’. These are areas which make up and are essential to the spirit of Cambridge and are not subject to review as they are considered sacrosanct and remain inviolate.
4.48 Whilst the Councils conclude, we believe erroneously, that the remaining areas of Green Belt have increased in value, they have not taken into account the increasing realisation of the absolute importance of providing sustainable development. In those terms we believe that the Councils have not taken into account the NPPF. At the time of the 2002 Study Planning Policy Guidance 2: Green Belts set out the national policy on the Green Belt purposes, land use objectives and the presumption against inappropriate development. March 2012 saw the NPPF put in place. The NPPF assumes a presumption of sustainable development stating “the purpose of planning is to help achieve sustainable development”. The NPPF sets out thirteen factors to be considered to secure sustainable development, of which consideration of the Green Belt is but one. Paragraph 84 of the NPPF states that “when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development”.

4.49 There has been no consideration of the other factors which contribute towards sustainable development in the Councils’ overall evaluation, of which the Green Belt Study plays a part. Rather, the Green Belt has been seen of paramount importance in determining whether development can be accommodated on the edge of Cambridge within the Green Belt and the Development Strategy is based on perceived capacity rather than identified need.

4.50 We respectfully put that the consideration of where development should go should be seen within the overall factors of delivering sustainable development and that a balanced view should be taken. It is of vital importance that a Green Belt review is robust and in depth and not contain anomalies, inconsistencies and errors as we have described.

4.51 Rejecting most of the edge of Cambridge sites because they are Green Belt means that, by default, Green Belt issues have been determined to be more important than all the other Sustainability Topics, Issues and Objectives which both Councils consider important for their Plan. Sites on the edge of Cambridge have been rejected without knowledge of the cumulative and long term effects on sustainability of restricting development in a sustainable location close to jobs and facilities – the most sustainable location available to SCDC in the hierarchy.

The Need to Examine the Councils’ Green Belt Review

4.52 We have shown inconsistency between the review undertaken in 2002 with that of 2012 and inconsistency within the joint 2012 Study itself. The interpretation of the criteria is unclear, inconsistent and appears to contain errors. We have described how large parcels skew the results as the highest value is taken.

4.53 The 2002 Study described in Step 5 that the worth to Green Belt function was attributed as the highest value and also that the “highest value is used to extrapolate importance to Green Belt purpose and then used along with the magnitude of effect to evaluate the potential significance of development”. We have shown how the extrapolation of the ‘Importance to Green Belt’ for
Cambridge South in the joint 2012 study is higher than any of the individual factors. This skews the interpretation not only of ‘Importance to Green Belt’ but also ‘Significance of Development on Green Belt’. We have shown that the interpretation of Magnitude for Cambridge South is skewed. All these combine to skew the assessment to a negative bias for Cambridge South.

4.54 Development should be directed towards the most sustainable location. The edge of Cambridge sites are high in the hierarchy of sustainable locations for growth and the most sustainable available to SCDC. It is important to ensure that any Green Belt review undertaken takes every opportunity to try to identify sites which could be developed without significant harm to the Green Belt purpose and so that a sustainable balance is achieved. The review should be in considerable depth and detail as locating development in much less sustainable locations will have repercussions now and into the future. A review with errors and inconsistency is not a good basis to discard Cambridge South.

4.55 The NPPF is clear that the context of Green Belts should only be altered in exceptional circumstances. The circumstances are clear in that without Green Belt release and development on the outer edge of Cambridge, the second most sustainable location for development will be ring fenced, forcing development to less sustainable locations. These issues will not go away. There will be a continued and widening discrepancy between locations for employment and where people live.

4.56 NPPF paragraph 83 states that authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they are capable of enduring beyond the plan term. There will continue to be pressure for development on the edge of Cambridge close to employment.

4.57 SEA regulations require that the Plan should be monitored to mitigate adverse effects. This in itself will bring pressure to develop on the edge of Cambridge to redress the widening imbalance of homes not being provided close to employment centres and a Plan which is not sustainable.

4.58 Paragraph 84 of the NPPF states that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. This is patently not the case, sustainability issues have not been considered in the Councils’ Green Belt reviews.

4.59 Considering the anomalies and errors we have found, we have undertaken a review of the Green Belt in Cambridge South.

4.60 There is no standard methodology for Green Belt review. Whilst we caution the Councils’ approach in that we consider that the Green Belt issues should be considered alongside the
other factors which contribute to sustainability, in order to allow direct comparison our review follows the methodology in the joint Councils’ review of 2012.
5 Review of Cambridge South

Criteria used for 2012 Inner Green Belt Boundary Study

5.1 We use the Councils’ assessment methodology but use smaller land parcels as we have shown the large land parcels used in the Councils’ appraisal skew the results.

5.2 Table 1 of this report sets out the inter-relationship between the national and local purposes of including land in the Green Belt.

5.3 Table 2 sets out the interrelationship between the purposes and how these are assessed.
Table 2: Table showing interrelationship of Purposes and Assessment.

<table>
<thead>
<tr>
<th>National and Local Green Belt Purposes</th>
<th>Method of Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Green Belt Purposes</td>
<td></td>
</tr>
<tr>
<td>Cambridge Green Belt Purposes (CCC and SCDC)</td>
<td>2012 Inner Green Belt Boundary Study</td>
</tr>
</tbody>
</table>

**To check the unrestricted sprawl of large built-up areas.**

Not included in the Councils’ assessment as it is not usually seen to be of paramount importance for Cambridge.

**To prevent neighbouring towns merging into one another.**

- Prevent communities in the environs of Cambridge from merging into one another and with the City.

- The distribution, physical separation, setting, scale and character of Green Belt villages.

- By site visit.

  Perceived judgement based on visual attributes of distance, lie of the land and intervening vegetation.

**To assist in safeguarding the countryside from encroachment.**

Not included in the Councils’ assessment as it is not usually seen to be of paramount importance for Cambridge.

**To preserve the setting and special character of historic towns.**

- Maintain and enhance the quality of its setting and

- Preserve the unique character of

- Key views of Cambridge from the surrounding countryside

- A soft green edge

- To preserve the setting and special character of Cambridge;

Desk study and site visits.

City set in a rural, mostly agricultural setting with a soft green edge. Historic and social associations, for example views
| To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. | Cambridge as a compact, dynamic City with a thriving historic centre. | • A distinctive urban edge  
• Green corridors penetrating into the City  
• Designated sites and other features contributing positively to the character of the landscape setting.  
• A landscape that retains a strong rural character. | • ensure the protection of green corridors running from open countryside into the urban area;  
• a vision of the City and the qualities to be safeguarded to Kings College Chapel or Grantchester Meadows. | The buildings surrounding Cambridge separated by a predominantly rural agricultural setting. Assessment whether area is important to separation between villages and on their setting, scale and character. The rural nature of the landscape around Cambridge particularly in providing a setting to the urban form when seen from key views and to provide settings to necklace villages. Impact on rural character in immediate vicinity of the City. Cambridge is acknowledged to be a compact City but care must be exercised as this is not necessarily about distance from the centre but about ease of access and communication between different areas. | Not included in the Councils’ assessment as it is not usually seen to be of paramount importance for Cambridge. |
Assessment of Special Character

5.4 The setting and special character of Cambridge has been previously defined in a number of documents. Two are particularly relevant to this review:

- Cambridge Green Belt Study 2002 SCDC; and
- Cambridge Landscape Character Assessment, 2003 CCC.

5.5 Cambridge Landscape Character Assessment was adopted by CCC as planning guidance. These documents form the reference base for this assessment and the relationship between them are set out in Table 3.

Assessment of Views

5.6 A number of documents define views. The following will be used in this assessment:

- Cambridge Landscape Character Assessment 2003;
- Cambridge Green Belt Study 2012; and

Subdivision of Cambridge South

5.7 To allow easier data handling the 2002 Green Belt Review describes how the City edge is sub-divided into ‘Sectors’ which are themselves sub-divided into ‘land parcels’. However, there are acknowledged disadvantages to this approach. The 2002 report states in paragraph 4.1.6 that the “Assessments were made on a site-by-site basis…..The worth to Green Belt function was attributed as the highest value.” If the land parcel is large and includes for example a foreground setting across part of the land parcel, or a feature such as a river corridor considered ‘sacrosanct’, the highest level of importance was taken across the whole land parcel.

5.8 The Inner Green Belt Boundary Study 2002 showed Cambridge South as Sector Seven which was divided into five areas. For the 2012 Study the Councils have amalgamated the land parcels so that Area 1, Area 2, part of Area 3, Area 4 and part of Area 5 of the 2002 study are combined into one vast land parcel – Sector 8.1 (Figure 4).

5.9 The assessment of large areas has a negative skew as there are generally variations across the area and the highest value is attributed to large areas and on top of this the highest value is taken for ‘Importance to Green Belt’. This flies in the face of ensuring the Study takes every opportunity to identify sites and is as robust as possible.

5.10 We have therefore sub divided Cambridge South into small land units. In the same way as in the 2012 Inner Green Belt Boundary Study, not all land areas follow recognisable field boundaries.
Steps

5.11 To allow comparison the methodology undertaken follows the principles set out in the 2012 Inner Green Belt Boundary Study undertaken jointly by Cambridge City Council and South Cambridgeshire District Council.

5.12 We have therefore undertaken this review according to the Councils’ own assessment methodology with adjustments to take account of the fact that:

- smaller areas will be assessed to give more accurate results; and
- the evaluation of the Importance to Green Belt will be based on the highest value of the attributes ‘Importance to Setting’; ‘Importance to Character’; Importance to Physical Separation, Distribution, Setting; Scale and Character of Green Belt Villages; and ‘Importance to Rural Character’.

5.13 The steps undertaken in the Councils’ Green Belt Study December 2012 are set out on page 3 of that document.

5.14 This study utilises various resources including aerial photographs and ordnance survey maps. Site visits were undertaken, during which time photographs were taken. Reference was also made to the MAGIC.gov.uk database and various technical supporting documents to the previous and the emerging development plans of the local authorities.

5.15 This review was carried out through desk top review initially and with particular reference to previous documents including the Cambridge Landscape Character Assessment 2002. A field survey was then carried out and environmental criteria was collated and assessed and presented in tabular form.

5.16 The Guidance Notes outlined in Table 2 of the 2012 Study is used for the land parcels. The detailed survey and analysis allows an overall judgement of how important an area is to the purposes of the Green Belt, made from the base data and the assessments of importance to setting, character and separation.

The Study Area

5.17 The study area is shown in Figure 1.

Assessment

Topography

5.18 The topography of the area is illustrated in Figure 7. This shows the chalk hills rising to the east of Shelford Road and the low lying areas following the river valley.

5.19 Figure 8 shows the site in more detail. The land lies between 10 and 25m at Ordnance Datum (AOD). The river lies to the south and the river falls gently towards the river course. There is a ridge of land to the west and roughly parallel with Shelford Road.
Land use

5.20 Figure 9 shows the land use and landscape character of the area. The urban area of Trumpington lies to the north and Great Shelford to the east. There is ribbon development along Shelford Road to the north east. The motorway forms the west boundary.

Environmental Designations

5.21 Figures 10 and 11 show designations in the local area. There is a Scheduled Ancient Monument within the site.

Special Character

5.22 The factors considered are set out in Table 3.
<table>
<thead>
<tr>
<th>Cambridge Landscape Character Assessment 2003</th>
<th>Cambridge Green Belt Study 2002</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Character Area</td>
<td>Natural Character Area</td>
</tr>
<tr>
<td>Cambridge Character Area</td>
<td>Landscape Character</td>
</tr>
<tr>
<td>Part of the site is a continuation of the South West River Corridor.</td>
<td>The site lies partly in The Granta Valley Character Area, but mostly in the Rhee and Bourn Valley Character Area. Granta Valley characterised by its wooded appearance which restricts views. Rhee and Bourn Valley have key views to Cambridge from the M11. A low-level view is noted from the elevated M11 junction with Hauxton Road to the west of Hauxton Road towards the City.</td>
</tr>
<tr>
<td>Defining Character</td>
<td></td>
</tr>
<tr>
<td>Defining Character</td>
<td>Special Qualities to be Safeguarded</td>
</tr>
<tr>
<td>This is Defining Character of Cambridge in terms of Setting, Separations, Views, Green Corridor and Environmental Character.</td>
<td>The site is identified as rural land. No particular qualities are identified to be safeguarded Plan 1641LP/09. Urban gateway identified on Hauxton Road Plan 1641LP/07.</td>
</tr>
<tr>
<td>Setting</td>
<td>Townscape/Landscape Role</td>
</tr>
<tr>
<td>In the immediate area of Cambridge South there are no areas of higher land.</td>
<td>Site lies in an area of ‘Connective Landscape/Townscape’ – areas described as an integral part of the City and its environs, but lack individual distinction, or do not play a significant contribution to the setting of the City Plan 1641LO/08.</td>
</tr>
<tr>
<td>Section</td>
<td>Description</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Green Corridor</td>
<td>Green corridors provide a landscape framework for the City. Cambridge owes much of its very special character to the way these spaces penetrate the urban fabric. The River Cam forms part of the south boundary of the site – part of the Defining Character.</td>
</tr>
<tr>
<td>Water Courses and Bodies</td>
<td>The River Cam and its flood plain are part of the Defining Character.</td>
</tr>
<tr>
<td>Views of the City</td>
<td>Important views are identified from view cones extracted from the Local Plan.</td>
</tr>
<tr>
<td>Skyline with Topography</td>
<td>Important views to Cambridge are identified from the M11.</td>
</tr>
<tr>
<td>Separation</td>
<td>The separation between Cambridge and either Shelford or Hauxton is not considered to be an area where there is a danger of communities merging. It is stated that areas between communities should be assessed and the minimum amount of actual separation required to ensure there is no perception of one community merging with another should be evaluated.</td>
</tr>
<tr>
<td>Supporting Character</td>
<td></td>
</tr>
<tr>
<td>Edges</td>
<td>The south extent of the urban area is identified as a negative edge.</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Cambridge South is bounded on three sides with road infrastructure making this a hard and negative edge.

<table>
<thead>
<tr>
<th>Local Views</th>
<th>Individual views are not identified.</th>
<th>Two views are recorded.</th>
</tr>
</thead>
</table>

| Ancient Woodland, Tree Cover, Hedgerows and Veteran Trees | No areas of significant vegetation, old hedges and field boundaries or veteran trees are identified. It is acknowledges that there are significant trees within the floodplain. | Elements and features contributing positively to the character of the landscape setting. | Nothing of relevance to Cambridge South is identified in this section – other than the Cam and its flood plain which has been previously included. |
Green Belt Assessment of Cambridge South

5.23 Figure 12 shows the land parcels. Like the 2012 Study these do not always follow field boundaries and aim to pick up the change in value across the whole site.

5.24 Table 4 sets out the Assessment Table for Cambridge South.

5.25 Figure 13 illustrates the value of the land parcels in plan form.

5.26 The assessment clearly shows that there are significant areas of Cambridge South which could be developed without significant undue harm to the purpose of the Green Belt.

5.27 The possible new Green Belt boundary could follow Hauxton Road, the M11 and the edge of the river corridor flood plain which is demarcated by a track. This boundary has the advantage of being absolute and permanent. There would be no question of development ‘jumping’ the major barriers of the motorway and the river.

5.28 Not all land which is released from the Green Belt need be developed. The apron of land which the Councils regard as important to the setting of Cambridge could be established and the Hauxton Road gateway enhanced.
### Table 4: Inner Green Belt Area Assessment of Cambridge South, SECTOR 8.

<table>
<thead>
<tr>
<th></th>
<th>AREA 1</th>
<th>AREA 2</th>
<th>AREA 3</th>
<th>AREA 4</th>
<th>AREA 5</th>
<th>AREA 6</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CHARACTER AREA/TYP</strong></td>
<td>Parts are Supporting</td>
<td>Parts are Supporting</td>
<td>Parts are Supporting</td>
<td>Parts are Supporting</td>
<td>Parts are Supporting</td>
<td>Parts are Defining</td>
</tr>
<tr>
<td><strong>DEFINING/SUPPORTING</strong></td>
<td>Supporting</td>
<td>Supporting</td>
<td>Supporting</td>
<td>Supporting</td>
<td>Supporting</td>
<td>Defining</td>
</tr>
<tr>
<td><strong>PROXIMITY TO HISTORIC</strong></td>
<td>5km</td>
<td>5km</td>
<td>5km</td>
<td>5km</td>
<td>5km</td>
<td>5.5km</td>
</tr>
<tr>
<td><strong>CORE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>VEGETATION</strong></td>
<td>Some field boundary hedges.</td>
<td>Some field boundary hedges.</td>
<td>Some field boundary hedges.</td>
<td>Some field boundary hedges.</td>
<td>Some field boundary hedges.</td>
<td>Some field boundary hedges.</td>
</tr>
<tr>
<td><strong>PREVALENT LOCAL BUILT</strong></td>
<td>2 storey, low density. Some new higher density development.</td>
<td>2 storey, low density.</td>
<td>2 storey, low density. Rugby club house, flood lights and goal posts.</td>
<td>2 storey, low density. Rugby club house, flood lights and goal posts.</td>
<td>2 storey, low density.</td>
<td>2 storey, low density.</td>
</tr>
<tr>
<td>PROXIMITY TO GREEN CORRIDOR</td>
<td>Clay Farm corridor 800m.</td>
<td>Clay Farm corridor 800m.</td>
<td>Clay Farm corridor 800m.</td>
<td>Clay Farm corridor 800m.</td>
<td>Clay Farm corridor 800m.</td>
<td></td>
</tr>
<tr>
<td>----------------------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
<td></td>
</tr>
<tr>
<td>IMPORTANCE TO SETTING</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>IMPORTANCE TO CHARACTER</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>IMPORTANCE TO PHYSICAL SEPARATION, DISTRIBUTION, SETTING, SCALE AND CHARACTER OF GREEN BELT VILLAGES</td>
<td>Negligible</td>
<td>Negligible</td>
<td>Negligible</td>
<td>Low</td>
<td>High</td>
<td></td>
</tr>
<tr>
<td>IMPORTANCE TO RURAL CHARACTER</td>
<td>Low</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
<td></td>
</tr>
<tr>
<td>IMPORTANCE TO GREEN BELT</td>
<td>LOW</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
<td>HIGH</td>
<td></td>
</tr>
<tr>
<td>SIGNIFICANCE OF DEVELOPMENT ON THE GREEN BELT</td>
<td>MEDIUM/LOW</td>
<td>MEDIUM/LOW</td>
<td>MEDIUM/LOW</td>
<td>MEDIUM/LOW</td>
<td>MEDIUM</td>
<td>HIGH</td>
</tr>
<tr>
<td>AREA</td>
<td>AREA 7</td>
<td>AREA 8</td>
<td>AREA 9</td>
<td>AREA 10</td>
<td>AREA 11</td>
<td>AREA 12</td>
</tr>
<tr>
<td>---------</td>
<td>-------------------------</td>
<td>-------------------------</td>
<td>-------------------------</td>
<td>-------------------------</td>
<td>-------------------------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>CHARACTER AREA/TYPE</td>
<td>Parts are Supporting</td>
<td>Parts are Supporting</td>
<td>Defining – river corridor.</td>
<td>Parts are Supporting</td>
<td>Parts are Supporting</td>
<td>Parts are Supporting</td>
</tr>
<tr>
<td>DEFINING/SUPPORTING</td>
<td>Supporting</td>
<td>Supporting</td>
<td>Defining</td>
<td>Supporting</td>
<td>Supporting</td>
<td>Supporting</td>
</tr>
<tr>
<td>PROXIMITY TO HISTORIC CORE</td>
<td>5.5km</td>
<td>5.5km</td>
<td>5.5km</td>
<td>5.5km</td>
<td>5km</td>
<td>5km</td>
</tr>
<tr>
<td>PREVALENT LOCAL BUILT FORM</td>
<td>n.a.</td>
<td>n.a.</td>
<td>n.a.</td>
<td>n.a.</td>
<td>n.a.</td>
<td>n.a.</td>
</tr>
<tr>
<td>PROXIMITY TO GREEN CORRIDOR</td>
<td>Clay Farm corridor 800m.</td>
<td>Clay Farm corridor 800m.</td>
<td>Clay Farm corridor 850m.</td>
<td>Clay Farm corridor 800m.</td>
<td>Clay Farm corridor 800m.</td>
<td>Clay Farm corridor 800m.</td>
</tr>
<tr>
<td>----------------------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
<td>--------------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>IMPORTANCE TO SETTING</td>
<td>Low</td>
<td>Low</td>
<td>Very High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td>IMPORTANCE TO CHARACTER</td>
<td>Low</td>
<td>Low</td>
<td>Very High</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
</tr>
<tr>
<td>IMPORTANCE TO PHYSICAL SEPARATION, DISTRIBUTION, SETTING, SCALE AND CHARACTER OF GREEN BELT VILLAGES</td>
<td>High</td>
<td>Low</td>
<td>High (towards Great Shelford)</td>
<td>Low</td>
<td>Low</td>
<td>Low</td>
</tr>
<tr>
<td>IMPORTANCE TO RURAL CHARACTER</td>
<td>Medium</td>
<td>Medium</td>
<td>High</td>
<td>Medium</td>
<td>Medium</td>
<td>Medium</td>
</tr>
<tr>
<td>IMPORTANCE TO GREEN BELT</td>
<td>HIGH</td>
<td>MEDIUM</td>
<td>VERY HIGH</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>SIGNIFICANCE OF DEVELOPMENT ON THE GREEN BELT</td>
<td>MEDIUM</td>
<td>MEDIUM/LOW</td>
<td>VERY HIGH</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
</tr>
<tr>
<td></td>
<td>AREA 13</td>
<td>AREA 14</td>
<td></td>
<td></td>
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</tr>
<tr>
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<td>---------------------------------------------</td>
<td>---------------------------------------------</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>CHARACTER AREA/TYPE</td>
<td>Parts are Supporting</td>
<td>Parts are Supporting</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>DEFINING/SUPPORTING</td>
<td>Supporting</td>
<td>Supporting</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PROXIMITY TO HISTORIC</td>
<td>5.5km</td>
<td>5.5km</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>VEGETATION</td>
<td>Some field boundary hedges.</td>
<td>Some field boundary hedges.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IMPORTANT VIEWS</td>
<td>Views generally restricted.</td>
<td>Views across towards the edge of Cambridge.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EDGE TYPE</td>
<td>Addenbrooke’s Road, otherwise contiguous with arable fields.</td>
<td>Roundabout, Hauxton Road and Addenbrooke’s Road otherwise contiguous with arable fields.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
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6 Conclusion

6.1 The CCC 2012 Appraisal shows land in Cambridge South as having lower importance to the Green Belt as well as areas of higher importance.

6.2 The joint Green Belt Study 2012 shows land in Cambridge South with Negligible, High and Very High significance.

6.3 We find errors and or inconsistency in how information for Cambridge South has been extrapolated for the following criteria:
   - Assessment of Importance to Green Belt;
   - Magnitude of Effect of a Development Proposal; and
   - Significance of Development on Green Belt.

6.4 All the errors result in the criteria being skewed to being more important to Green Belt and higher Significance of Impact. Applying corrections to the Councils’ own reckoning shows that their own assessment shows major tracts of land in Cambridge South which could be developed without significant undue harm to the purpose of the Green Belt.

6.5 We show that the assessment of large land areas is likely to be skewed.

6.6 It is important that any review upon which judgements are based and sites rejected should be robust and not contain errors. We have therefore undertaken a review of the Green Belt of Cambridge South using smaller land parcels and find that while some land is of Very High Importance and High Importance to the purposes of the Green Belt, most of the land is Medium importance and could be developed without significant undue harm to the purpose of the Green Belt.

6.7 Cambridge South is in a very sustainable location, close to employment centres, close to Shelford railway station, the guided bus route and the M11. It is particularly well placed as a location for sustainable development. It could be developed without significant undue harm to the purpose of the Green Belt and should not be rejected on unsound assessment.
Appendix 1 - Sustainable Development Strategy

Prior to 2003 the strategy for development in the Cambridge Sub Region was based on dispersed growth to towns and villages beyond the outer Green Belt boundary. This was seen to be unsustainable with people commuting to their place of work in Cambridge, contributing to congestion, greenhouse emissions, air quality problems and other quality of life issues.

A persuasive and forceful argument was made by Cambridge City Council (CCC), amongst others, in its document ‘Towards 2016: Towards a New Cambridge Green Belt’ based on the premise that ‘there may be exceptional cases….where releasing Green Belt land would offer a more sustainable solution than green field development elsewhere’. The location mismatch between the major employment hubs and where people live influenced the Regional Plan for East Anglia 2000 and subsequently the Cambridge and Peterborough Structure Plan 2003 to review the Green Belt so that land on the edge of Cambridge could be allocated for residential development to help redress the imbalance between the location of houses and places of work.

In tandem with emerging policy, further and strategically significant reviews were undertaken during the process of the Regional Planning Guidance for East Anglia (RPG6) 2000 with broad locations for Green Belt release identified in the Cambridgeshire and Peterborough Structure Plan 2003. Detailed changes to the inner Green Belt were made in the Cambridge Local Plan 2006 and the South Cambridgeshire Local Development Framework 2007-2010.

The development strategy in the Cambridgeshire and Peterborough Structure Plan 2003, and carried into the two Council’s current plans, aims to focus development according to the sequence which is considered most sustainable:

1. Within the urban area of Cambridge;
2. On the edge of Cambridge;
3. In the new town of Northstowe; and
4. In the market towns and better served villages in South Cambridgeshire.

CCC Sustainability Appraisal – Proposed Submission of July 2013 states that “the draft plan is essentially a pragmatic continuation of the 2006 growth strategy, with adjustment to reflect the experience of delivery of that strategy and the current context for planning”. Six small sites have been identified on the edge of Cambridge as proposed Site Options for both residential and commercial development.

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1 Planning for Sustainable Development: Towards Better Practice’ DETR 1998
We conclude that the result of this adjustment to the strategy is not a continuation of the strategy but a return to the dispersed pattern of development prior to 2003 which resulted in many of Cambridge’s major environmental problems.

SCDC states the “The new Cambridge Local Plan proposes modest further revisions to the Green Belt which means that Cambridge is able to meet its full objectively assessed needs within its administrative area, although it makes little additional contribution to South Cambridgeshire’s objectively assessed needs”. It should be noted however that the Sustainability Appraisal undertaken on Cambridge’s Proposed Submission states that “there will be a significant shortfall of affordable houses, which will impact on the levels of deprivation within Cambridge”.

In addition, we believe the Green Belt Review which has been undertaken is flawed in a number of respects. Decisions to reject sites on the edge of Cambridge have been taken without a thorough appraisal and with no consideration of the consequences for sustainable development when reviewing Green Belt boundaries as required by the NPPF.
Appendix 2 – Green Belt Context

The Cambridge Green Belt tightly encircles Cambridge and extends three to five miles from the edge encompassing many villages. The Green Belt has been challenged and changed since it was designated.

The Cambridge Green Belt had its roots in the 1930s, began to be firmed up in the 1950s and was formally defined on the Town Map in 1965.

The Cambridge Preservation Society was founded in 1928 to ‘foster public opinion towards the preservation of the beauties of Cambridge and its neighbourhood, and to cooperate with the County and Local Authorities and others, for this purpose’. Soon after the Society was formed, it embarked on a programme of purchases of open farmland to the west of Cambridge around the villages of Coton and Madingley; places cherished by the dons as they can be reached easily on foot from the centre of the City. It also resorted to selective ‘sterilisation’ of land close to town by covenants from landowners not to build on their land. This was achieved in the case of Grantchester Meadows, the fields which line the west bank of the River Cam between the town and the village of Grantchester.

The Society was also represented on early planning committees and played an active part in the Cambridgeshire Regional Planning Report of 1934. The report proposed “a chain of reservations …which would, in effect, keep a generally open belt of country encircling Cambridge”. The report listed sites to be included; Madingley Hill to the west of Cambridge and the Grantchester Meadows. The Gog Magog Hills to the south east of Cambridge were also included.

The policies which led to the establishment of the Cambridge Green Belt are generally attributed to the work of Professor Holford and his colleague Mr Myles Wright. Their proposals were published in 1950 and known as the ‘Holford Report’. However, there is a striking similarity between this and an earlier review by Dykes Bower in 1943. Only two copies of this earlier review remain. Both reports tried to do away with the idea that Cambridge was ‘the only true ‘university’ town left in England’ pointing out that commerce and industry has already taken the lead in expanding employment in the town and also pointing out the growth in jobs in central and local government. Both recognized the unique character of Cambridge and that uncontrolled growth was the main threat to the character of Cambridge. Holford recommended that the planning committee should try to reduce the rate at which Cambridge was growing and to reach a stable population at around 100,000 or 125,000 for the larger area of Urban Cambridge.

The Dykes Bower review addressed the need for “one of the main planning aims of Cambridge’ for ‘abstention from building’ to ‘preserve the close approach of the country’ on the west side of the town. This was also the approach of the Cambridge Preservation Society. Their main preoccupation at that time was to prevent the indiscriminate spread of Cambridge into the surrounding countryside by way of ‘ribbon development’ and the introduction of mass production industry to the town, a fate which had befallen Oxford in the shape of the Morris motor works at Cowley.
The Draft Cambridgeshire Development Plan was published in 1952 and approved in 1954. It aimed to preserve Cambridge as a predominantly University town with a population ceiling of 100,000.

In 1957 the Minister gave approval in principle for a Green Belt round the City and the area covered by draft proposals from the County Council was to be immediately treated as Green Belt. Although the Green Belt was drawn tightly around the City as a planning tool to help maintain Cambridge as a small university and market town, it also introduced the concept of ‘white land’ to be a limited reserve for future development within the inner edge of the Green Belt.

The Green Belt was fully embodied in the Development Plan with the approval of the First Review of the Town Map in 1965.

Following consultation an amended Cambridge Green Belt Local Plan was put on Deposit in 1984. Since that time there were a series of modifications until the Green Belt Local Plan was adopted in 1992. The Cambridge Local Plan was adopted in 1996 with an amendment in the area of West Cambridge to take account of the needs of University development.

The history of the Green Belt shows a number of modifications over time (Figure 14) although one area of uniformity was that when compared with the five purposes of Green Belt policy set out in PPG2, the purpose which is consistently mentioned in all the historic Plans is its role in preserving the setting and special character of historic towns. Safeguarding the countryside from encroachment is emphasized less and assisting in urban regeneration is not considered relevant.

Challenges to the Green Belt

The future of the Cambridge Green Belt has been challenged throughout this period. The controls over new industry and commerce were relaxed in the 1970s. New businesses have been attracted to Cambridge, especially ‘high-tech’ firms which benefit from a close relationship with the University. The buoyancy of the local economy has led to a rapid increase in the population. Attempts were made to release additional areas, through representations on the Green Belt Local Plan and through the Cambridge Local Plan. There were a number of changes to the Green Belt boundary between 1965 and 1996, including the addition of an area to the south east of Cambridge which included part of Netherhall School, Limekiln Close and East Pit and some land released from Green Belt on the northern fringe of the City Figure 15.

However, with Cambridge unable to expand to accommodate increasing business and housing need, newcomers have largely settled in the outlying villages, now effectively detached suburbs. This has generated a large increase in local road traffic. The pressures on Cambridge and its sub-region by these trends called for a review of planning policies.

The concept of restraint surrounding Cambridge was questioned as early as 1966 when the Future Shape of Cambridge was published by the then City Architect and Planning Officer, Gordon Logie. It looked at how the City should develop over the next forty to fifty years, suggesting future tongues of
development which would allow the City to grow, while maintaining and enhancing its man-made advantages and the principle of compactness Figure 15.

In the early 1970s Professor J Parry Lewis was commissioned by national and local government to undertake a Study of the Cambridge Sub-Region 1974. This study was concerned with taking the pressures off the historic centre of Cambridge. Parry Lewis concluded that Cambridge “must grow in order to retain as much of its character as it can” and that the only way to conserve the historic centre was to have a major expansion Figure 16.

In the late 1990s Cambridge Futures, a partnership of business, local government and the academic world, presented a number of options for growth.

At around the same time, Cambridge City Council presented a document entitled ‘Cambridge Green Belt. Towards 2016’ to support their view that there should be a radical reassessment of the Green Belt. The report set a case for the need for the continued growth of Cambridge as the economy and mobility amongst other factors had changed considerably during the period of the Green Belt Plan and that the pressing need was to reduce journey to work flows for the benefit of both employers and employees, and to address the issues of affordability of houses and housing need.

Whilst the economic and social argument for Green Belt release was strong, the Council acknowledged that environmental and landscape factors were important in any future consideration of shaping the Green Belt. However the Council recognised that “Green Belt designation is not in itself any guide to the quality and value of the landscape” finding that “not all of the Green Belt is of equivalent value with parts of it playing no important role” of supporting the purpose of the Green Belt “other than by being part of a blanket presumption against development.”
The exceptional circumstance that the Green Belt should be altered to provide for development on the edge of Cambridge was informed by a number of studies. In particular, two studies are of particular importance:

- the Inner Green Belt Boundary Study undertaken by CCC in 2002 was carried out to specifically assist with identifying sites that could be released from the Green Belt for development close to Cambridge without harm to the purposes of the Green Belt including the setting of the City; and

- the Cambridge Green Belt Study by Landscape Design Associates in 2002 for South Cambridgeshire District Council. The latter took a wider, more strategic look at the Green Belt. The former was carried out with the specific purpose to identify sites close to Cambridge that could be released for the development in the 2006 Local Plan.

**Cambridge City Council Green Belt Study 2002**

All Green Belt, by definition, performs the five purposes of including land within the Green Belt. Whilst it was acknowledged at that time that all Green Belt land performs these functions, the method adopted in the 2002 review begins with the acknowledgement that not all land supports the purpose of the GB to the same extent. Predicated by the fact that to accommodate growth some land must be released from the GB, the study therefore determined to identify land which least supported the purpose of the GB, leading to the identification of land parcels to be released from the GB for development.

The Cambridge City Council Inner Green Belt Boundary Study 2002 was also guided by the principles set out in Cambridgeshire Landscape Character Assessment, a study undertaken in the late 1990s to early 2000s and which remained an internal document until 2003 when it was published.

The Landscape Character Assessment 2003 identifies the ‘Defining Characteristics’ of Cambridge which should remain sacrosanct and ‘Supporting Character’.

The Inner Green Belt Boundary Study 2002 undertook an assessment on a site-by-site basis of the importance to the Green Belt purposes of setting, character and also of separation and described land as ‘Very High, High, Medium, Minor and Negligible’ according to the way in which it supported the Green Belt function.

The 2002 Inner Green Belt Boundary Study is reproduced here in Figure 17. It is worth noting at point 4.1.6 of that report “the worth to the Green Belt function was attributed to the highest value”. In other words, that for every parcel of land, the assessment of importance to the Green Belt function was based on the highest value of any part of that area.
Other assessments undertaken on the Green Belt around this time

Other reviews of the Green Belt were undertaken around the same time as Cambridge City Council's 2002 review. These include the following.

Cambridge Green Belt Landscape Setting Study 1998 undertaken for SCDC

The report describes the site within the Cam River Valley South with the River Cam running through gentle low topography past the Shelfords and Sawston before cutting into the higher chalklands beyond Whittlesford.

The study identifies that development on the site behind Shelford Road would have only moderate impact on the City's setting.

Colin Buchanan and Partners 2001 Cambridge Sub Regional Study. SCEALA (Standing Conference of East Anglian Local Authorities)

Figure GBR 4 identifies that development on part of the site would have only moderate impact on the City's setting, although the study continues by identifying only minor opportunities for development in the site and recommends only minor removal of the site from the Green Belt.

It should be noted that this review essentially rings Cambridge to the north east, south west and north west as areas with no or very limited potential for development capacity because development would compromise the primary and secondary purposes of the Green Belt, including the land between Teversham and Fulbourn that the Councils indicated in their joint 2012 study if of Low or Medium Significance of Development on the Green Belt.


This study describes the site as being in the both the Granta Valley and Rhee and Bourn Valley Character Type.

Plan 1641LP/06 reproduced here as Figure 18 shows Cambridge South as an area with 'Level views, countryside foreground, generally soft urban edge'. Since the time of the assessment major development has taken place, including the Addenbrooke's Road. The plan shows one key low level view from the Hauxton Road junction with the motorway towards the City. This view is to the west of Hauxton Road, not across the site.

Plan 1641LP/08 reproduced here as Figure 19 shows Cambridge South as Connective Townscape/Landscape described as “areas of townscape/landscape which are an integral part of the city and its environs, but lack individual distinction, or do not play a significant contribution to the setting of the city”.

The site is described as being in the ‘Outer Green Belt’ on plan 1641LP/10 reproduced here as Figure 20 and it is not within an area of ‘Landscape essential to the special character and setting of Cambridge’
The reviews were undertaken according to the circumstances at that time and have in common the protection of elevated land and views to the city centre.

**Cambridge City Council 2012 Appraisal**

The appraisal recognises that the current development strategy for the Cambridge area stems as far back as 1999 with the work undertaken by Cambridge Futures and the recognition that a change in approach was required in order to redress the imbalance between homes and jobs in and close to Cambridge, and provide for the long term growth of Cambridge University and Addenbrooke's Hospital whilst minimising increases in congestion on radial routes into Cambridge. The report acknowledges that throughout the preparation of the Plans which gave effect to the release of land from the Green Belt, namely the Cambridge Local Plan, South Cambridgeshire Local Development Framework and the joint Area Action Plans for North West Cambridge and Cambridge East, there was strong local acknowledgement of the growing need for the most sustainable form of development and delivery of new affordable homes in the Cambridge Area.

The Council cite two studies which fed into the process, the Cambridge City Council Inner Green Belt Boundary Study 2002 and the South Cambridgeshire District Council Cambridge Green Belt Study September 2002.

The Council notes that the SCDC 2002 document took a wider, more strategic look at the broader Green Belt around the City and how it benefited both the City and the general area. They state the CCC 2002 study was carried out to assist specifically in identifying sites that could be released from Green Belt for development close to Cambridge without harm to the purposes of the Green Belt or the setting of the City.

This 2012 appraisal has a simplified methodology to the 2002 appraisal, although Defining Character and Supporting Character, as defined in the Cambridge Landscape Character Assessment, are used in the methodology as a basis for the appraisal.

CCC also used the edge characteristics described in the SCDC document 2002 as follows:

- Level views, with a countryside foreground and a generally soft urban edge) the west side of Cambridge and the north east Cam corridor, including views from the M11, northern and southern railway approaches and sections of the A14);
- Elevated views with a countryside foreground and a generally soft urban edge (from the Gog Magog Hills to the south east of Cambridge);
- Level views within little / no foreground and a generally hard edge (housing and science park as seen from the A14 on the north side of Cambridge); and
- Level views with a mixed foreground and a mixed urban edge (The eastern side of Cambridge, which is dominated by the Airport).
The edge characteristics for Cambridge South are described best by the last bullet point. The foreground is mixed with the infrastructure of the new Addenbrooke’s Road and development to the north. The view is level. Whilst it could be argued that there is an elevated view from the roundabout, the receptors of this view are overwhelmingly passengers in vehicles. Vehicles entering Cambridge will be more aware of the view to the west of Hauxton Road. Viewers on the east side of Hauxton Road will be exiting the City and so the view across Cambridge South is behind them.

The Council notes that “the Addenbrooke’s Road and the developed area (of Glebe Farm) bring the urban edge further into the rural landscape and closer to the M11” and stipulates that this makes the land between the M11 and the new urban edge more important to the setting of the City and to the Green Belt. We do not accept this. The purpose of the Green Belt is clearly set out in the NPPF and does not include the idea of Green Belt having an increased importance.

The appraisal concludes in summary, that areas “where the City is viewed from higher ground or generally has open aspects, or where the urban edge is close to the city centre, could not easily accommodate change, whereas areas where the edge has mixed foreground can accommodate change more easily. On a comparative basis these areas have a lesser importance to the setting of the City and to the purposes of Green Belt”. We consider that Cambridge South has a mixed foreground and can accommodate change more easily.

The plan is reproduced here as Figure 3.

Irrespective that the interpretation of the assessment undertaken and how this was used to prescribe the value to the Green Belt is not transparent, it is very apparent that the area of lower importance identified is not extensive. This could be insufficient for the quantum of houses which may be required to come forward in the Plan period.

The graphic reproduction of the grey scale is difficult to read. Some of the areas which it is assumed to be an area of higher importance are lighter grey in tone and difficult to differentiate from areas of lower importance.

The largest areas of land identified as an area of lower importance to the Green Belt is to the south of Teversham on land which is currently occupied by Cambridge Airport. This is a large area which in the event is likely to be largely undeliverable in the Plan period. Without the core of development on the Airport coming forward, development to the east in and around Teversham would not be a logical urban extension to Cambridge, even though it is considered of Lower Importance to the Green Belt.

There is another area highlighted to the west of Cambridge between the A603 and the A1303 as an area of Lower importance. However, this area is part of a Green Finger and Corridor identified as Defining Character in the Cambridge Landscape Character Assessment paragraph 2.3.2. It was also an area added to the Green Belt between 1965 and 1996. Green Finders/Corridors are long established in Policy as an extremely important characteristic of Cambridge and these were given Green Belt status. Policy P9/3b of the Structure Plan emphasises the importance to ensuring ‘the protection of the green
corridors running from open countryside into the urban area’. It is therefore very unlikely that this area will be acceptable for development.

There is an area highlighted to the west of Trumpington Road as being of Lower importance to the Green Belt. Whilst this land is likely to be available as it is understood to belong to Cambridge City Council and Cambridgeshire County Council, the area highlighted to the west of Trumpington Road provides a sense of separation between the city centre and Trumpington. Separation in the Cambridge context has long been taken as separation between Cambridge and the necklace villages. It is therefore possible that the sense of separation has not been taken into account fully and these areas do support the purpose of the Green Belt.

Whilst it is acknowledged that land ownership and likelihood of delivery are not relevant to whether or not land supports the purpose of the Green Belt the plan of significance is not in enough detail to help any determination of which of the Broad Locations is more or less sensitive in landscape terms.

2012 Inner Green Belt Boundary Study

This review was undertaken in autumn 2012 by officers of CCC and SCDC and published in December 2012 as part of the background technical supporting documentation of their joint working and respective local plans.

The purpose of the review was to provide an up to date evidence base to help both Councils reach a view on whether there are specific areas of land that could be considered for release from the Green Belt and allocated for development to meet identified needs, without specific harm to the Green Belt purposes.

The methodology broadly follows the methodology used in 2002 Inner Green Belt Study and May 2012 Appraisal.

We have concluded that there are differences in the interpretation of the two 2012 documents. We have also shown that there are errors in the interpretation of the results as well as inconsistencies.
Appendix 4 - Summary of Green Belt Representations

We have previously submitted a Green Belt Critique of the work undertaken by CCC and SCDC in February 2013 which raised our concern of the approach and conclusion of both previous Green Belt studies undertaken by the Councils namely that:

- large, variable parcels of land were considered in some areas, and because of the variation across the land parcel the most significant results were ascribed to the whole area;
- the assessment of the criteria is not clear; and
- the results of the assessment are not transparent.

We have expressed our concerns about the assessment methodology in the consultation process which can be summarised as follows:

- whilst the May 2012 appraisal identifies relatively large tracts of land to the south west of Shelford Road as of Lower Importance (equivalent to sites which are currently proposed as Site Options) a conclusion could be reasonably drawn that these areas south west of Shelford Road, by the CCC’s own reckoning, should be proposed as Site Options;
- Plan 1 of the May 2012 illustrates the locations of ‘Elevated Views’ and ‘Flat Views’. None accord with the views which appear on Plan 3 of the December 2012 Study;
- Plan 3: Landscape analysis of the December 2012 appraisal show two ‘Setting Views’ extending from the M11 / Hauxton Road junction and just north of this from Hauxton Road, close to the junction with Addenbrooke’s Road. These point north east and east south east towards Great Shelford. These views have nothing to do with the setting of Cambridge. They may be views over open countryside, but they are truncated by ribbon development along Shelford Road and are not sacrosanct to the character of Cambridge. The viewcones described in the Landscape Character Assessment as Defining Character are set out. None of these equate to the M11 / Hauxton Road junction. The closest viewpoint described in the Landscape Character Assessment is from the River Granta south of the M11 / Hauxton Road junction and describes the long distance view to White Hill and beyond to the north east and views to higher land to the north west.
- The highest value attribute for the Green Belt criteria is given as ‘High’ for Sector 8.1 in the December 2012 appraisal. The importance to Green Belt should therefore be ‘High’ – it is however marked as ‘Very High’. The assessment is therefore skewed. It results in a Significance of Development of ‘Very High’ when it could be reasonably extrapolated from the Council’s own assessment methods the Significance of Development should be ‘High’. Even though the development of Research and Development buildings would have a greater scale and potential impact, we anticipate that these buildings will be in a parkland setting which will help mitigate potential impacts. Were this development proposal for a residential site only, we
question the high value the Council has placed on the magnitude of impact for development on Cambridge South in direct comparison with the other residential sites assessed. This would give an even lower value. On face value, this makes sense as Grantchester Meadows, one of the most iconic landscapes of Cambridge is also marked as ‘Very High’. It seems counter intuitive that Cambridge South is the same significance as Grantchester Meadows.

- The area of 8.1 is huge. The criteria vary across such a large expanse of land. For example, this sector abuts the river and includes the river corridor. The river itself is Defining Character and this skews the result for the whole of the Sector 8.1.

We have identified areas where we believe the joint Study undertaken by both Councils;

- is unclear how judgements have been made and collated;
- appears to have errors;
- appears to be inconsistent and
- contains a bias away from large sites.
Appendix 5 – Relationship between the Green Belt Review and the Pro forma

In order to assess the sites at the fringe of Cambridge, CCC and SCDC jointly developed a Pro forma. This Pro forma was specifically developed to fully integrate the sustainability appraisal process into site assessment. The criteria in the Pro forma take into account the social, environmental and economic sustainability themes and objectives identified in the SA Scoping Reports of both Councils. The Pro forma also included planning and deliverability criteria which do not directly relate to SA.

Ten Green Belt criteria were included within the Pro forma as follows:

- what effect would the development of this site have on Green Belt purposes, and other matters important to the special character of Cambridge and setting?
- to preserve the unique character of Cambridge as a compact and dynamic City with a thriving historic core;
- to prevent communities in the environs of Cambridge from merging into one another and with the City;
- to maintain and enhance the quality of the setting of Cambridge;
- key views of Cambridge/important views;
- soft green edge to the City;
- distinctive urban edge;
- green corridors penetrating into the City;
- the distribution, physical separation, setting, scale and character of Green Belt villages (SCDC only); and
- a landscape which has a strongly rural character.

There is an additional criterion, ‘Overall conclusion on Green Belt’.

These Pro forma criteria were linked to South Cambridgeshire Sustainability Objective: ‘7. Maintain and enhance the diversity and distinctiveness of landscape and townscape character’ and Cambridge City Council Sustainability Appraisal Topic: Landscape, townscape and cultural heritage.

Whilst the National Planning Policy Framework is silent, Planning Policy Guidance 2 is clear, paragraph 1.7 states "The extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt, or in its continued protection. For example, although Green Belts often contain areas of attractive landscape, the quality of the landscape
is not relevant to the inclusion of land within a Green Belt or to its continued protection. The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over the land use objectives. There is no reason to consider this is no longer relevant as Green Belts contain land of variable landscape quality.

The purpose of including attractive landscapes in the Green Belt is not relevant to the purposes of the Green Belt, and therefore to link Green Belt issues to landscape/townscape Sustainability Objectives and Topics is flawed. The Green Belt criteria assessed in the Pro forma approximates to the Cambridge Green Belt purposes and the South Cambridgeshire factors which define the special character of Cambridge as set out in the middle column and the right column in Table 2 of this report.

There appear to be inconsistency between the assessment in the Pro forma and the assessment in the 2012 Inner Green Belt Boundary Study. For example, site SC105 has an overall conclusion of Red = High/Medium impacts. Sector 8 area 1 is the closest to site SC105 in terms of the area of land. Sector 8 Area 1 is considered to have a Very High Level of Significance.

It is unclear of the relationship between the Pro forma and the 2012 Inner Green Belt Boundary Study and it is unclear which assessment was used to reject sites on the fringe of Cambridge.