Greater Cambridge Green Belt Assessment

Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025

South Cambridgeshire District Council and Cambridge City Council

Final report

Prepared by LUC

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Introduction

1.1 Between 1st November 2021 and 13th December 2021 Greater Cambridge (South Cambridgeshire District Council and Cambridge City Council) carried out a public consultation on their preferred options for the emerging Greater Cambridge Local Plan, under Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012.

1.2 The preferred options, published as the Greater Cambridge Local Plan First Proposals, included policies relating to the Cambridge Green Belt with some proposed releases of Green Belt land for development. Council decisions regarding proposed Green Belt releases were informed by a number of studies, one of which was the Greater Cambridge Green Belt Assessment (LUC, August 2021) – henceforth referred to as the GCGBA. This study provided a comprehensive assessment of variations in harm to the Cambridge Green Belt Purposes that would result from the release and development of identified parcels of Green Belt land.

First Proposals Consultation

1.3 The responses to the Regulation 18 consultation included a number of submissions on behalf of promoters of sites putting land forward for development. The Councils reviewed these submissions and identified a number which raised issues relating to the methodology and findings of the 2021 Green Belt Assessment.

1.4 This document sets out the key issues raised within the submissions that LUC were asked to review and provides responses to them.

Site Submissions Update

1.5 Given the time between the First Proposals Consultation 2021 and the draft plan consultation in late 2025, to ensure they had the most up to date information going into the next stage of the plan process, the Councils held a Site Submissions Update 2025 consultation between February and March 2025. This provided a focused opportunity for promoters to submit new information on previously submitted sites or new sites. Whilst the Councils were not specifically seeking comments regarding Local Plan evidence to this focused consultation, some promoters provided additional comments regarding the Green Belt Assessment 2021 alongside their site updates.

1.6 This document sets out any additional issues raised within the submissions, together with LUC's responses. It does not repeat responses to issues already raised in relation to the same site in the First Proposals Consultation.

1.7 Also, it does not provide revised assessments to take account of any development applications approved since the GCGBA analysis was carried out, or any national planning policy changes that have occurred since then. The Councils have commissioned an update to the GCGBA to respond to changes in national planning policy, particularly in response to new policy regarding grey belt.

Chapter 2

Green Belt Assessment Issues and Responses

2.1 South Cambridgeshire District Council and Cambridge City Council identified 18 HELAA sites with First Proposals representations requiring a response from LUC. The site names, along with the reference numbers given by the Councils' online consultation system (Opus 2 Consult) are listed in Table 2.1 below. Sites for which new issues were raised in the Site Submissions Update in 2025 are listed in Table 2.2.

Table 2.1: First Consultation sites for which Green Belt issues have been raised

Representation Reference	Site Name
40041	Kings Gate site, Villa Road, Impington
40061	Land North of Impington Lane, Impington
40079	Land at Silverdale Close, Coton
40087	Land at Capital Park, Fulbourn
40096	Land north of A14 and south of Milton Road, Impington
40217	Land to the east of Ditton Lane, Fen Ditton
40232	Land west of South Road, Impington
40250	Land east of Gazelle Way and west of Teversham Road, Teversham
40316	Land off Branch Road and Long Road, Comberton
40329	Land to the west of Oakington Road, Girton

Representation Reference	Site Name
40392	Land at Ambrose Way, Impington
40414	Land east of Cambridge Road, Hardwick
40501	Land at Bush Lane, Comberton
40516	Land west of Ditton Lane, Fen Ditton
40546	Land to the east of Haverhill Road, Stapleford
40547	Land east of Cambridge Road, Sawston
47647	Land to the east of Horningsea Road, Fen Ditton
51610	Land off Shelford Road, Fulbourn
58243	Land at Fulbourn Hospital
58794	Land to the north of M11 and west of Hauxton Road, Trumpington

Table 2.2: Site Submission Update sites for which new Green Belt issues raised

Representation Reference	Site Name
40061	Land North of Impington Lane, Impington
40102	93 Impington Lane, Impington
40283	Land south of High Street, Hauxton
40365	Land South of Butt Lane, West of the A10, Milton
40392	Land at Ambrose Way, Impington
40414	Land east of Cambridge Road, Hardwick
59410	The Boundary, High Street, Horningsea
200759	Land at Girton Road

Representation Reference	Site Name
200829	Land East of Bridge Road, Histon

2.2 The following paragraphs take each site in turn, listing the issues raised and LUC's response. Text in brackets indicated whether the issue was raised in the First Proposals consultation or in the 2025 Site Submissions Update, or in both. Sites are referred to by their representation reference number. For brevity the Cambridge Green Belt purposes that were the subject of the analysis are referenced in the issues and responses as Purpose 1, Purpose 2 and Purpose 3; their full text is as follows:

- Purpose 1: Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.
- Purpose 2: Maintain and enhance the quality of its setting.
- Purpose 3: Prevent communities in the environs of Cambridge from merging into one another and with the city.

40041: Kings Gate site, Villa Road, Impington

Issue (First Proposals Consultation)

2.3 The GCGBA treats Histon & Impington (and other villages close to the city) as part of the main urban area of Cambridge when they shouldn't be, and therefore as contributing to Purpose 1. Growth of Impington in the location of the site would not be relevant to the compactness of Cambridge.

Response

2.4 Our assessments recognise certain settlements as being close enough to Cambridge to have some association with it. We recognise these settlements as having a degree of distinction from Cambridge, hence contribution to Purpose 1 is never assessed as 'significant' for parcels that do not directly abut the city, but their proximity is such that land around them cannot be considered irrelevant to maintaining Cambridge's compact form.

2.5 The gap between inset settlement areas at Impington and Cambridge is only 250m at the narrowest point, with the intervening Green Belt being almost entirely occupied by the A14 Histon Interchange rather than by undeveloped land. Therefore, the larger Impington/Histon and similar settlements (such as Girton) become, the more they will affect perceptions of the city's compactness.

Issue (First Proposals Consultation)

2.6 The parcel in which the site is located (HI18) is stated in the GCGBA as being open and in a moderate gap, with a degree of distinction from the urban area. This does not appear to meet the criteria set out in Table 3.4 for the 'relatively significant' rating that has been assigned for contribution to Purpose 3. This overstating of contribution to Purpose 3 results in an exaggerated assessment of the overall level of harm associated with release of the site.

Response

2.7 The assessment for HI18 actually states that "Land is open and lies in a moderate gap between Girton and Impington, but with no significant separating features". Paragraph 3.107 in the GCGBA methodology chapter notes with regard to the assessment of Purpose 3 that "Physical proximity was the initial consideration, but both built and natural landscape elements can act to either decrease or increase perceived separation…". The lack of significant separating

features makes the gap more fragile than would be the case if, for example, there were woodlands or major roads in between, so the text in Table 3.4 that is relevant in the case on HI18 is “Land is open and lies in a fragile gap between distinct settlements. It has moderate distinction from the inset settlement edge”.

Issue (First Proposals Consultation)

2.8 Adopting the landscape strategy proposed in section 6.0 (of the promoter’s submission), the main part of the site could be released from Green Belt without diminishing the performance of Green Belt purposes by the remainder of the parcel and adjoining Green Belt land, resulting in minimal harm to the Green Belt purposes.

Response

2.9 The GCGBA did not assess the potential level of mitigation that could be achieved by specific development proposals – this is not a straightforward judgement given the timescale required for landscaping measures to take effect, and the varying degrees of certainty surrounding different development proposals. The methodology recognises (at para 3.113) that “…there is potential for mitigation measures such as boundary strengthening and density of development within an inset area to influence [the level of adverse impact on retained Green Belt land]”.

40061: Land North of Impington Lane, Impington

Issue (First Proposals Consultation)

2.10 Whilst acknowledging that the GCGBA methodology is logical, the representor's review considers it to be "too complex and confusing", and that "in endeavouring to align their assessment criteria with the 3 Cambridge Green Belt purposes, the criteria used for each Green Belt purpose have become exceedingly complex and are far from being transparent, to the point that they are difficult to comprehend".

Response

2.11 It is recognised that the assessment is detailed, with a stepped analysis process, and that in many cases relatively small parcels of land are identified and rated. However, a number of Green Belt studies in recent years have been criticised at Local Plan Examinations as lacking sufficient granularity to support the exclusion of land from consideration for release and development. In our view a simplified analysis would have been open to challenge for not adequately reflecting spatial variations in circumstances.

2.12 We also consider it important to assess harm in relation to the Cambridge Green Belt purposes, which have a long history as the means by which the national Green Belt purposes have been applied locally.

Issue (First Proposals Consultation)

2.13 The methodology for defining parcels has led to instances where parcel boundaries cut across undefined open land. This contradicts NPPF para 143,

which states that boundaries should be defined clearly "…using physical features that are readily recognisable and likely to be permanent".

Response

2.14 Assessment parcel boundaries are not the same thing as proposed Green Belt boundaries. An adherence to the definition of parcels only where there are existing physical features would mean that the resulting parcels would not adequately reflect variations in contribution to the Green Belt purposes in Greater Cambridge.

2.15 Large arable fields are a characteristic of this area, and often there can be a significant difference in the degree of urbanising influence within the same field, depending on distance from the urban edge. As explained in para 3.53 of the methodology, "Such boundaries should be recognised as representing a gradual rather than precise or marked change".

2.16 Absence of an existing readily recognisable physical feature is not in itself a reason not to define a new Green Belt boundary in a particular location. Many Green Belt boundaries are defined by newly created physical features such as the boundaries of new residential curtilages, new roads or newly planted woodland belts or hedgerows.

Issue (First Proposals Consultation)

2.17 The assessment of Purpose 1 should not treat land around smaller settlements close to Cambridge as playing a role in maintaining the city's compact character. The assessment text stating that parcel HI8 is "…nearly contiguous with Cambridge but retains some distinction from the main City area…" is considered erroneous.

Response

2.18 Our assessments recognise certain settlements as being close enough to Cambridge to have some association with it. We recognise these settlements as having a degree of distinction from Cambridge, hence contribution to Purpose 1 is never assessed as 'significant' for parcels that do not directly abut the city, but their proximity is such that land around them cannot be considered irrelevant to maintaining Cambridge's compact form.

2.19 With regard to parcel HI8, in which the site is located, our phrase 'nearly contiguous' means that there is very little open land in between the parcel and the city.

Issue (First Proposals Consultation)

2.20 The promoter's representation disagrees with the way the criteria provided in paragraphs 3.31-3.35 are used in Table 3.4, stating that "There are examples where a gap of 2.5km between two inset settlements is described as a moderate gap while in other instances where there are settlements are the same distance apart the gap is considered to be wide".

Response

2.21 The methodology makes it clear (at paragraphs 3.106 and 3.107) that it is not just the physical size of the gap that is relevant to perceived separation of settlements. Built and natural landscape elements can serve to either increase or decrease perceived gap size, so a degree of judgement is involved in each individual assessment and there are consequently no fixed distance definitions for terms such as 'moderate' or 'wide'.

Issue (First Proposals Consultation and Site Submissions Update)

2.22 Referring to recent case law the representor's critique suggests that there is an over emphasis in the CGGBA on the volumetric (spatial) element of openness rather than both spatial and visual aspects.

Response

2.23 The analysis for each parcel under the heading 'Parcel location and openness' does focus on spatial openness – that is, the presence or otherwise of inappropriate development – but visual openness is an important consideration at Step 3 in the assessment process, the analysis of 'distinction' between urban and open land.

2.24 This is explained in paragraph 3.37: "Green Belt openness relates to lack of 'inappropriate built development' rather than to visual openness; thus, both undeveloped land which is screened from view by landscape elements (for example tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms. Visual openness is however still relevant when considering the degree of distinction between an urban area and the wider countryside – this is addressed at Step 3 below".

Issue (First Proposals Consultation)

2.25 The representation disagrees with the statement (in paragraph 3.113 of the GCGBA) that "Although the nature of development on released land could have some bearing on the strength of adjacent retained Green Belt land, it is unlikely to radically alter assessment outcomes". This is because: "This statement suggests that no matter how effective boundary strengthening to a developed parcel could be, it would have no overall material effect on the assessment of harm to the adjacent Green Belt land".

Response

2.26 This is a misreading of paragraph 3.113. It is acknowledged in the sentence preceding the one quoted above that "there is potential for mitigation measures such as **boundary strengthening** [emphasis added] and density of development within an inset area to influence" the level of adverse impact on retained Green Belt land. The quoted sentence states that potential mitigation measures relating to the form/character of built development are less likely to reduce harm than measures which would strengthen the boundaries between urban and open land.

2.27 At Chapter 5, where the GCGBA discusses generic mitigation measures for reducing harm, it is stated (para 5.10) that "There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area".

2.28 The GCGBA does not comment on the potential level of mitigation that could be achieved by specific development proposals – this is not a straightforward judgement given the timescale required for landscaping measures to take effect, and the varying degrees of certainty surrounding different development proposals – although it is fair to say that the higher the assessed level of harm, the stronger the mitigation measures would need to be to in order to minimise the impact of release and development of land.

Issue (First Proposals Consultation)

2.29 The statement (GCGBA para 3.129) that "…the harm rating given to a parcel or sub-area of it should be assumed to apply to any strategic scale release of land within that area" implies that the release of part of a parcel will cause the same harm as release of an entire parcel, and takes no account of potential mitigation measures.

Response

2.30 In general terms it is clear that a larger release of land will potentially cause more harm to land in the Green Belt than release of a smaller subset of that area. However, harm **to the Green Belt purposes** is a broader categorisation which is considering the relationship between released land and the remaining Green Belt. A narrow (50m for example) strip of land adjacent to an urban edge could be considered to have a stronger relationship with the urban area than land 200m away, but if the former lacks any significant boundary feature, then harm will often be in the same category on the 5-point scale used. As noted above, mitigation measures could potentially reduce harm.

Issue (First Proposals Consultation)

2.31 Representation says that "There are examples where the overall harm given to a parcel by LUC does not match the examples/criteria provided in Table 3.6 and equally where no details are provided to justify the judgement".

Response

2.32 No examples of this are provided, but a source of confusion regarding overall ratings may be that the examples given in Table 3.6 are all for cases where the stated level of contribution is to **one** Green Belt purpose. It is noted in paragraph 3.131 that "A stronger contribution to multiple purposes… will typically increase harm…". This approach has been applied consistently, although moderated by professional judgement rather than automatically deriving ratings from a matrix, so typically the harm rating will be higher than the benchmark example if the contribution rating applies to more than one Green Belt purpose.

Issue (First Proposals Consultation)

2.33 Parcel HI8 should be split into two separate parcels, with different distinction ratings, rather than just subdivided to reflect different levels of impact of release on the adjacent Green Belt. This will mean that that part of the parcel which is closer to the settlement would, due to weak distinction, only rate 'limited/no' contribution to Purpose 3.

Response

2.34 We do not think that there is a strong enough sense of urbanising containment to say that this open land has weak distinction from the urban area but we recognise, in defining two sub-areas, that release of smaller areas around the fringes of HI8 would result in less knock-on impact on adjacent Green Belt land than release of land in the larger, more visually open fields.

Issue (First Proposals Consultation)

2.35 The HI8 assessment incorrectly states that the land lies partially within and fronts directly onto the Histon and Impington Conservation Areas. This is only the case for the latter, and only for a short length of it. The parcel's role as a rural setting is insignificant because of the limited visual relationship between the conservation areas and the parcel, so contribution to Purpose 2 should be rated as 'relatively limited'.

Response

2.36 The HI8 assessment did not intend to suggest that the parcel lies adjacent to the Histon Village Conservation Area, which lies c.100m to the west; it misnamed the designated area to the south of the parcel as the Histon and Impington Conservation Area when it should have said Impington St Andrew's

Conservation Area. The assessment wording refers to the conservation area as being to the south, so it is clear that it is not referring to Histon.

2.37 With regard to the relationship between the parcel and the conservation area, contribution to setting is not solely a consideration of intervisibility. It is rarely the case that open land will be widely visible from a conservation area, due to the screening role of built development and vegetation, but proximity of one to the other contributes to a perceived relationship when moving between the two. We therefore stand by our rating for Purpose 2.

Issue (First Proposals Consultation)

2.38 It is incorrect to rate HI8 Area 1 as 'moderate-high' harm and Area 2 as 'moderate' harm. According to the GCGBA Table 3.6 criteria the ratings should be 'moderate' and 'low' respectively, even if constituent ratings are unchanged.

Response

2.39 As stated in paragraph 3.131 of the GCGBA, Table 3.6 provides only benchmark examples of harm ratings. These examples indicate contribution to one of the Green Belt purposes but it is noted in 3.131 that "A stronger contribution to multiple purposes… will typically increase harm…". In the case of HI8, the moderate contribution to **two** of the Green Belt purposes has informed the judgement of 'moderate' overall harm for the area in which the site is located, and 'moderate-high' harm for another part of the parcel. This approach has been applied consistently, although moderated by professional judgement rather than automatically deriving ratings from a matrix, so typically the harm rating will be higher than the benchmark example if the contribution rating applies to more than one Green Belt purpose.

Issue (Site Submissions Update)

2.40 The Representor's Landscape and Green Belt review sets out that the site comprises a small area of the larger parcel HI8. It argues that *"the assessment of HI8 is therefore very broad and averages the parcels categorisation"*.

Response

2.41 The parcels are defined based on variations in contribution and harm to Green Belt purposes. Two harm scenarios are identified for parcel HI8, with the site in question falling within scenario 2 which is assessed as having a moderate harm rating overall.

Issue (Site Submissions Update)

2.42 The Representation states, in relation to Purpose 1, that *"even where 'necklace' villages are within relatively close proximity to Cambridge or are tentatively 'linked' to Cambridge via a single line of linear development, parcels located on the far side of these settlements should not have been included in the assessment of this purpose, as we do not feel they are so visually or physically associated with Cambridge to have any bearing on preserving its character"*.

Response

2.43 Regarding Purpose 1: our assessments recognise certain settlements as being close enough to Cambridge to have a degree of association with it. We recognise these settlements as having a degree of distinction from Cambridge, hence contribution to Purpose 1 is never assessed as 'significant' for parcels that do not directly abut the city, but their proximity is such that land around

them cannot be considered irrelevant to maintaining Cambridge's compact form.

Issue (Site Submissions Update)

2.44 In regard Purpose 2 the Representation argues that there is "*very limited intervisibility with the Impington conservation area and none whatsoever with the Histon conservation area"* and that *"to contribute to the setting of a heritage asset, a site or landscape feature needs to be physically experienced and visible either directly or indirectly via sequential journeys along roads or footpaths"*.

Response

2.45 The association with Impington Conservation Area, combined with rural character, is considered enough to warrant a 'moderate' contribution rating. It is also accepted that there are variations in visual relationship with the conservation area, but a direct visual relationship is not a prerequisite of contribution to setting.

Issue (Site Submissions Update)

2.46 In regard to Purpose 3, the Representation argues that *"the site itself is a proportionately small area of parcel HI8 and the gap between Impington and Landbeach and so its contribution to the purpose is further reduced"*.

Response

2.47 In our view, development of the site land would still have some impact on the perceived strength of the gap. It is borderline 'limited' to 'relatively limited'

for the site area, but this didn't make a material difference to our harm rating, given that we rated contribution to Purposes 1 and 2 higher than contribution to Purpose 3, so a separate sub-area was not defined.

40079: Land at Silverdale Close, Coton

Issue (First Proposals Consultation)

2.48 Representor has submitted a Green Belt assessment that was carried out prior to the GCGBA and so does not take issue with it but presents findings that indicate a low contribution to the NPPF Green Belt purposes due to three key factors. These are its strong outer boundary tree cover, limited association with the wider countryside and lack of relationship with the setting of Cambridge or of Coton Conservation Area.

Response

2.49 The GCGBA rated harm of release of this site as 'moderate' (the second lowest rating on the 5-point scale employed). The site retains enough rural character to make some contribution to Cambridge's rural setting (Cambridge Green Belt Purpose 2), but it is acknowledged that this part of parcel CT12 is more contained by tree cover than is the case for land to the west and that, as a result, its release would have minimal impact on adjacent Green Belt land. We agree, therefore, that harm should be rated 'low' rather than 'moderate' for this site.

40087: Land at Capital Park, Fulbourn

Issue (First Proposals Consultation)

2.50 Existing urbanising influence together with containment from the wider Green Belt are considered to limit harm to less than the 'moderate-high' rating given in the GCGBA for parcel CHI5.

Response

2.51 Although there are urbanising influences these do not significantly diminish the role of the site, as part of the Fulbourn Hospital Conservation Area, in contributing to Cambridge's historic setting. The assessment also notes that tree cover within the parcel creates a degree of distinction from the inset urban area of Cambridge.

Issue (First Proposals Consultation)

2.52 It is noted that parcel MI5 had similar individual scores but was only rated as causing 'moderate' harm to the Green Belt purposes.

Response

2.53 This is true, but as noted in GCGBA paragraph 3.131 "…rather than simply combining loss of contribution ratings and the impact on adjacent Green Belt ratings in a mechanical/mathematical way, professional judgement was used in each individual case to consider and evaluate how much weight to attach to each contributing element". In the case of CHI5 the location of the site within a conservation area, and the difficulty in avoiding impact on this, was considered enough to warrant a 'moderate-high' harm rating. Although there are modern

buildings within the parcel these are principally located to the north of the historic hospital buildings. Slightly less weight was given to the combination of circumstances in parcel MI5.

40096: Land north of A14 and south of Milton Road, Impington

Issue (First Proposals Consultation)

2.54 Review of the GCGBA considers it to be comprehensive and robust but overcomplicated, making it difficult for many readers to understand.

Response

2.55 It is recognised that the assessment is detailed, with a stepped analysis process, and that in many cases relatively small parcels of land are identified and rated. However, a number of Green Belt studies in recent years have been criticised at Local Plan Examinations as lacking sufficient granularity to support the exclusion of land from consideration for release and development. In our view a simplified analysis would have been open to challenge for not adequately reflecting spatial variations in circumstances.

Issue (First Proposals Consultation)

2.56 The differences between the GCGBA methodology and the qualitative Cambridge Inner Green Belt Boundary Study (2015) make it hard to cross-compare findings.

Response

2.57 The GCGBA is a comprehensive study assessing all of the Cambridge Green Belt. This replaces the 2015 study, so it is not intended that a comparison is made between the two.

Issue (First Proposals Consultation)

2.58 There is overlap between the factors that combine to determine contribution ratings, in particular between Purpose 1 and Purpose 2.

Response

2.59 This overlap reflects the nature of the Green Belt purposes and factors that are relevant to their assessment. Openness is a fundamental quality of Green Belt land, so development that affects this can have a bearing on contribution to all the purposes, and the relationship between urban and open land (which is termed ‘distinction’ in our assessments) is also relevant to all the purposes.

Issue (First Proposals Consultation)

2.60 The GCGBA, in determining overall harm, focuses on the highest contributing purpose(s) rather than considering contribution to other purposes. It would be more helpful to consider contribution more broadly.

Response

2.61 The representation quotes GCGBA paragraph 3.63, which says that “the contribution ratings for each purpose were not added up to give a cumulative overall contribution rating, as a significant contribution to one rating may in itself

indicate that the land is making a significant contribution to function of the Green Belt". This statement was intended to indicate that straightforward cumulative scoring approach was not used, but it is not the case that the analysis based its parcel harm rating only on the highest rating given to any of the purposes.

2.62 Whilst a significant contribution to a single purpose can be enough to result in a high level of harm it is also the case that contribution to more than one purpose can result in higher harm than contribution to a single purpose. This is indicated in paragraph 3.131, which states that "A stronger contribution to multiple purposes… will typically increase harm…".

Issue (First Proposals Consultation)

2.63 No definitions are provided to indicate what constitutes a 'wide gap', 'moderate gap', or 'narrow gap' in relation to Cambridge Purpose 3, leaving it to the assessor to determine the terminology to use.

Response

2.64 As the assessment of relevance to Purpose 3 is not based solely on distance it was felt that strict definitions for distances would be unhelpful. This does not, however, mean that individual assessors used these descriptive terms without internal guidance. Cross-checking was used to ensure a consistent approach.

Issue (First Proposals Consultation)

2.65 The GCGBA is wrong to say that low density or small-scale built development should be considered 'open' land in Green Belt terms (as stated in paragraph 3.41).

Response

2.66 It is accepted that any inappropriate development, however small, is having some impact on Green Belt openness. The intention in paragraph 3.41 was to indicate that in the context of an assessment parcel such development would not be considered to diminish the openness of the undeveloped parts of the parcel.

Issue (First Proposals Consultation)

2.67 The approach of combining contribution to Green Belt purposes with impact on adjacent Green Belt in order to determine overall harm, as illustrated in GCGBA Figure 3.10, is not applied in Table 3.6 (benchmark examples used to inform the assessment). The representation cites examples where level of harm calculated using the former does not correspond to level of harm calculated using the latter, including the parcels occupied by the majority of the proposed 40096 built development area.

Response

2.68 Figure 3.10 was intended only to indicate the concept of 'level of contribution to Green Belt purposes + level of impact on adjacent Green Belt = overall level of harm'; not to suggest a direct linear relationship between the two. Reference should be made to Table 3.6 for more precise examples, although the table only includes examples and is not intended to be a comprehensive list of every possible combination of factors.

Issue (First Proposals Consultation)

2.69 The terminology for different harm levels is considered to be skewed, with three of the five rating levels including the term 'high'.

Response

2.70 In the absence of any official guidance, the terminology for levels of harm should just be considered in a relative manner. Given the need for 'exceptional' or 'very special' circumstances to justify its release, it was felt that using the term 'low' in more than one rating level name would not reflect the importance afforded to the Green Belt in national planning policy.

Issue (First Proposals Consultation)

2.71 More detailed justification should have been provided to support each parcel assessment.

Response

2.72 The supporting analysis is considered to be sufficient to justify the ratings given. The study generated a very large number of assessment parcels (in excess of 600) to reflect identified variations in harm, so more detailed analysis would have been disproportionate.

Issue (First Proposals Consultation)

2.73 The defined 'outer areas' of Green Belt, beyond the parcels defined in associated with each inset settlement, are very large and should not be given blanket 'very high' harm ratings.

Response

2.74 The study assessed harm of development as an expansion of existing inset areas (noted at paragraph 3.9 of the GCGBA), not creation of new ones,

so we think it is reasonable to say that expansion of any settlement as far as an outer area would result in ‘very high’ harm.

Issue (First Proposals Consultation)

2.75 Representation agrees with the GCGBA view that the A14 forms a strong boundary feature to Cambridge, meaning that the site makes a strong contribution to preventing its sprawl, but it is suggested that the main road also has landscape, visual and tranquillity impacts that harm rural character.

Response

2.76 Rural character is part of the Purpose 2 consideration, but we do not believe there to be sufficient adverse impact from the main road to reduce the contribution for this purpose below the ‘moderate’ rating given. The sensitivity of the landscape and views in this area to development is also a separate consideration to Green Belt harm, which the Councils have taken into consideration when determining the options for development presented in the ‘First Proposals’ consultation.

Issue (First Proposals Consultation)

2.77 The representation agrees with the assessed contribution ratings but feels that the harm ratings should better reflect Figure 3.10 and suggests ‘moderate-high’ would be a more “appropriate and balanced assessment” for the majority of the site (within parcels OA1 and KI2) rather than the ‘very high’ harm ratings that were given.

Response

2.78 Figure 3.10 was intended only to indicate the concept of 'level of contribution to Green Belt purposes + level of impact on adjacent Green Belt = overall level of harm'; not to suggest a direct linear relationship between the two.

2.79 We note that the site is presented as a new inset development in the Green Belt, whereas the GCGBA assessment was of harm of expanding an **existing** settlement into the parcels in question. A site-specific assessment has not been carried out, but the location of proposed built development within the site in relation to other settlements, and to the A14, would suggest that significant Green Belt harm would still result.

40102: 93 Impington Lane, Impington

Issue (Site Submissions Update)

2.80 The Representation suggests that the GCGBA only considered the spatial (physical) dimension of openness and not the visual aspect and, that instead, the visual aspect is used in the assessment of distinctiveness.

Response

2.81 This is explained in paragraph 3.37: *"Green Belt openness relates to lack of 'inappropriate built development' rather than to visual openness; thus, both undeveloped land which is screened from view by landscape elements (for example tree cover) and development which is not considered 'inappropriate', are still 'open' in Green Belt terms. Visual openness is however still relevant when considering the degree of distinction between an urban area and the wider countryside ..."*.

Issue (Site Submissions Update)

2.82 Area 2 and the site is largely visually contained, with views of residential properties having an urbanising visual influence. The Representation argues *"for this reason, area 2 and the site has a weak distinction from Impington"*.

Response

2.83 It is conceded that this small part of parcel HI8 (i.e. the site) has a weaker distinction than the main part of the parcel further to the north. However, as this area of the site (area 2) falls below the minimum 1ha parcel size used in the GCGBA it was not identified as a separate parcel or release scenario.

Issue (Site Submissions Update)

2.84 The Representation argues that *"even where 'necklace' villages are within relatively close proximity to Cambridge or are tentatively 'linked' to Cambridge via a single line of linear development, parcels located on the far side of these settlements should not have been included in the assessment of this purpose, as we do not feel they are so visually or physically associated with Cambridge to have any bearing on preserving its character"*.

Response

2.85 Our assessments recognise certain settlements as being close enough to Cambridge to have a degree of association with it. We recognise these settlements as having a degree of distinction from Cambridge, hence contribution to Purpose 1 is never assessed as 'significant' for parcels that do not directly abut the city, but their proximity is such that land around them cannot be considered irrelevant to maintaining Cambridge's compact form.

Issue (Site Submissions Update)

2.86 The Representation argues that “It is considered that the somewhat tenuous reference to the rural setting o Cambridge is simply not relevant in the context of this site which only has a direct relationship with Impington”, and that the site makes a limited contribution to Purpose 2.

Response

2.87 The association with Impington St Andrews Conservation Area, combined with rural character, is considered enough to warrant a ‘moderate’ contribution rating. Table 3.3 of the GCGBA provides exemplars for a modertae contribution to Purpsoe 2, with the following relevant to parcel HI8: *“Land use is not associated with an inset settlement, land is open but does not have strong distinction from any inset settlements and therefore has some rural character; but forms/contains some features/aspects that contribute to the quality of Cambridge’s setting”*.

Issue (Site Submissions Update)

2.88 Developing within the small site that is effectively an infill site would have a negligible impact on Purpose 3.

Response

2.89 We agree that the small size and more contained nature of the site would result in less impact on the perceived strength of the gap.

Issue (Site Submissions Update)

2.90 The Representation concludes that the site's removal from the Green Belt would result in a low overall harm rating.

Response

2.91 The GCGBA rated harm of release of Area 2 of parcel HI8 site as 'moderate' (the second lowest rating on the 5-point scale employed). However, it is acknowledged that this small part (<1ha) of parcel HI8 is more contained by urban edges and therefore we agree that harm from its release would be 'low'.

40217: Land to the east of Ditton Lane, Fen Ditton

Issue (First Proposals Consultation)

2.92 Parcel FD7 should not include land both to the east and west of Ditton Lane. This fails to recognise the presence of Ditton Lane and the visual separation between the two parts of the parcel that its adjacent tree cover provides.

Response

2.93 The Green Belt study is concerned with the relationship between open land and urban areas. Land both to the east and west of Ditton Lane is considered to have a similar relationship with urban areas, and with the wider Green Belt, so the intervisibility between land to either side of the road is not relevant.

Issue (First Proposals Consultation)

2.94 'High' harm rating for release of land in sub-area 1 is wrong, given that contribution rating is 'moderate' for each Green Belt purpose, and impact of release on adjacent Green Belt is 'minor-moderate'.

Response

2.95 The rating is consistent with the methodology. The 'moderate' contribution rating for all three purposes was assessed as carrying more weight than a moderate contribution to only one or two of the purposes. It should also be noted that the impact on the adjacent Green Belt is **additional** to the harm caused by loss of contribution of land released for development; this is indicated in the methodology (para 3.140) and in the wording of the 'Overall harm of Green Belt release' summary in each individual parcel assessment.

Issue (First Proposals Consultation)

2.96 Representation questions the GCGBA statement that release of sub-area 2 would remove the gap between Cambridge and Fen Ditton.

Response

2.97 This was referring to the gap between Cambridge and Fen Ditton along High Ditch Road rather than along Ditton Lane. It is accepted that a smaller release within sub-area 2 would preserve a gap, but the fragility of settlement separation here is such that any release will still cause some weakening of the remaining open land, so our rating would be unchanged.

40232: Land west of South Road, Impington

Issue (First Proposals Consultation)

2.98 Representor's assessment says that alignment of the site with the existing inset settlement edge to the north, together with the low density of proposed development, are together considered to warrant a rating of 'moderate' rather than 'high' harm.

Response

2.99 Development density was not considered in the GCGBA. The study did not assess specific development proposals, so the assumption was made that development would result in loss of openness. Mitigation measures could potentially reduce harm but strengthening of boundaries would be more likely to have this effect than a reduction in development density (unless the proposed density was low enough for land in intervening open spaces to still have a significant relationship with the wider Green Belt). As noted in para 3.113 of the report "…the nature of development on released land… is unlikely to radically alter assessment outcomes".

2.100 Alignment with the existing settlement would only be considered to have a significant impact on harm if it meant a) that the parcel was to a degree contained by urban development, or b) that the alignment in question provided a strong boundary to the proposed release. This is a very visually open landscape, with little vegetation along the drain that marks the parcel's outer boundary, so neither of these circumstances apply.

40250: Land east of Gazelle Way and west of Teversham Road, Teversham

Issue (First Proposals Consultation)

2.101 Assessments of 'moderate-high' to 'very high' harm, for parcels in the site area conflict with the 2012 Inner Green Belt Boundary Study, which assessed land in the site area as having medium or low significance to the Green Belt purposes.

Response

2.102 There is no guidance as to how Green Belt assessments should be carried out, and the methodology employed in this study is significantly different to that employed in 2012. The 2012 study was superseded by the 2015 Cambridge Inner Green Belt Study as a result of concerns about its methodology and findings expressed by the inspectors at the 2015 examination of the Local Plans. The 2015 study concluded for this area that "It is unlikely that any development within this sector could be accommodated without substantial harm to Green Belt purposes". It is not, therefore, considered necessary to justify inconsistency with the 2012 assessment findings.

40283: Land south of High Street, Hauxton

Issue (Site Submissions Update)

2.103 The Representation argues that the contribution the site makes to Purpose 2 is 'Limited'.

Response

2.104 We note that the appraisal only makes reference to the findings of HX7, whereas the site being promoted also covers the northern part of parcel HX6. The GCGBA rated contribution of parcel HX6 and HX7 as 'Relatively Limited' (the second lowest rating on the 5-point scale employed). The rural character of parcels, along with the contribution of HX6 makes on approach to Cambridge along the railway line, is considered enough to warrant a 'Relatively Limited' contribution rating.

Issue (Site Submissions Update)

2.105 The Representation argues that the GCGBA *"does not record the separating effect of the elevated M11 corridor and its planted embankments which serve to prevent any physical and visual connectivity between Hauxton and Little Shelford, nor that the Site is considerably indented into the eastern edge of Hauxton"*.

Response

2.106 The gap between Hauxton and Little Shelford is very narrow and despite the presence of the M11 is considered to be very fragile. The reference to the site being 'indented into the eastern edge of Hauxton' seems to be referring only to parcel HX7. It should be noted the site also covers the northern part of parcel HX6 which occupies the narrowest part of the gap and which is assessed as making a significant contribution to Purpose 3.

Issue (Site Submissions Update)

2.107 The Representation argues that the minor impact reported in the GCGBA (referring only to parcel HX7) is *"considered to be incorrect as the Site is surrounded along three of its boundaries by the existing settlement whereas, were it to be developed, only a single site boundary would interface against the adjoining rural landscape that would remain separating the Site from the M11 corridor"*.

Response

2.108 The impact here is in relation to adjacent land to the east, for which the developed frontage would increase - i.e. the currently open farmland of parcel HX7 would be replaced by built development - and thus increase urbanising visual influence.

40316: Land off Branch Road and Long Road, Comberton

Issue (First Proposals Consultation)

2.109 Challenges assessment of strong distinction from the inset settlement area for the central and eastern parts of parcel CO1, strength of role in relation to Cambridge's setting (Purpose 2) and categorisation of gap between Comberton and Hardwick (Purpose 3). It is suggested that contribution to Purpose 2 should be 'moderate' rather than 'relatively significant', contribution to Purpose 3 should be 'relatively limited' rather than 'relatively significant', and overall harm should as a result be 'moderate-high' rather than 'very high'.

Response

2.110 The mature boundary hedgerow along the end of the long, well-treed gardens of houses on Fox's Way, combined with the inclusion of those gardens in the Green Belt, means that there is no perception within this parcel of being close to an urban edge. The rising elevation of land within the parcel adds to distinction from the urban edge – noting that most of the inset settlement is on land closer to 30m than to the 40-47m elevations in this parcel – and continued rising elevation to the north of the parcel limits the effectiveness of the hedge-lined Branch Road as a visual barrier boundary feature. In terms of contribution to the Green Belt purposes, impact on adjacent open land and overall harm we stand by our assessment findings for parcel CO1.

Issue (First Proposals Consultation)

2.111 Harm of release of parcel CO3 should be 'low' rather than 'moderate' according to Table 3.6.

Response

2.112 The benchmark example in Table 3.6 is for a case where a parcel makes a 'relatively limited' contribution to **one** of the Green Belt purposes. It is noted in paragraph 3.131 of the GCGBA that "A stronger contribution to multiple purposes… will typically increase harm…" and this is the case for parcel CO3, which makes a relatively weak contribution to two purposes rather than just to one. Applying professional judgement we consider this to be a case where that contribution to multiple purposes, combined with some impact on the adjacent Green Belt, warrants a 'moderate' harm rating rather than the lowest rating level.

40329: Land to the west of Oakington Road, Girton

Issue (First Proposals Consultation)

2.113 The conclusion of 'high' harm for parcel GI8 doesn't follow the analysis. The constraining effect of existing washed-over development to the north of the site in parcel GI9 isn't adequately taken into account, and the eastern part of the site should be assessed separately to the western part of the parcel, with the split at Beck Brook, to reflect this.

Response

2.114 The 'minor-moderate' rating given to the level of impact on adjacent Green Belt land reflected increased urbanising impact on adjacent land and also a narrowing of the gap between Girton and Oakington. However, on reflection we agree that the containment on the eastern part of the parcel by washed-over development and by Beck Brook (which forms the inset settlement

boundary to the south) would limit impact on the settlement gap. This would reduce the rating for impact on adjacent Green Belt to 'minor' and the overall harm rating for this part of the parcel from 'high' to 'moderate-high'. The western part of parcel, which is less contained, would still rate 'high' for harm.

40365: Land South of Butt Lane, West of the A10, Milton

Issue (Site Submissions Update)

2.115 It is suggested that the site should have been considered in a more granular assessment, given the urbanising influence of the park and ride that lies within its northern half, and that this should have identified only a 'limited' contribution to Cambridge Purpose 2. It is also suggested that contribution to other purposes should've been lower, given this existing development and also containment of the site by strong physical features.

Response

2.116 The most significant factor in the 'very high' harm rating for the parcel in which this site lies (MI1) is the boundary formed by the A10 and associated woodland belt to the entire western side of Milton. The park and ride, although it has some urbanising influence/association, has just a single small building and so limited visual impact beyond its surrounding tree belts.

2.117 The site's containment by a tree belt to the west does not compensate for the breach of the current strong and consistent boundary that would result from the loss of openness in the site as a result of new development. The boundary is weaker to the south and so development could result in additional urbanising impact on land to the south.

2.118 These factors warrant the harm rating assigned in the GCGBA. It should be noted that the nature of any specific development proposals, and any associated mitigation measures, was not taken into consideration in the GCGBA. The now approved police station application within the site (20/04010/FUL) also was not taken into consideration as part of the assessment.

40392: Land at Ambrose Way, Impington

Issue (First Proposals Consultation and Site Submissions Update)

2.119 Representor's assessment suggests lower harm. Principal reasons are lack of relationship with Cambridge (Purpose 1), lack of relationship with the Impington St Andrews Conservation Area (Purpose 2) and degree of containment by inset development and screening vegetation (Purpose 3).

Response

2.120 Regarding Purpose 1: our assessments recognise certain settlements as being close enough to Cambridge to have a degree of association with it. We recognise these settlements as having a degree of distinction from Cambridge, hence contribution to Purpose 1 is never assessed as 'significant' for parcels that do not directly abut the city, but their proximity is such that land around them cannot be considered irrelevant to maintaining Cambridge's compact form.

2.121 Regarding Purpose 2: the association with Impington Conservation Area, combined with rural character, is considered enough to warrant a 'moderate' contribution rating. It is accepted that there are variations in visual relationship

with the conservation area, but a direct visual relationship is not a prerequisite of contribution to setting.

2.122 Regarding Purpose 3: in our view development here would still have some impact on the perceived strength of the gap. It is borderline 'limited' to 'relatively limited' for the site area, but this didn't make a material difference to our harm rating, given that we rated contribution to Purposes 1 and 2 higher than contribution to Purpose 3, so a separate sub-area was not defined.

Issue (First Proposals Consultation and Site Submissions Update)

2.123 It is argued that development in this location should be recognised as infill, and that there is potential for mitigation through boundary enhancement that would further limit harm.

Response

2.124 Although there is a degree of containment the partially contained area is, in our view, too large and subject to too little urbanising visual influence for development to be considered just infilling.

2.125 The GCGBA does not comment on the potential level of mitigation that could be achieved by specific development proposals – this is not a straightforward judgement given the timescale required for landscaping measures to take effect, and the varying degrees of certainty surrounding different development proposals. However, there will always be a degree of harm to the Green Belt purposes associated with the loss of contribution of developed land, and the rating of 'minor' impact on adjacent Green Belt for sub-area 1 also suggests a limited potential for reducing harm.

Issue (Site Submissions Update)

2.126 It is argued that development of land on the site, given its location to the west of parcel HI8, would not diminish the physical or perceived distance between Impington and Landbeach (Purpose 3).

Response

2.127 Regarding Purpose 3: in our view development of the site land would still have some impact on the perceived strength of the gap. It is borderline 'limited' to 'relatively limited' for the site area, but this didn't make a material difference to our harm rating, given that we rated contribution to Purposes 1 and 2 higher than contribution to Purpose 3, so a separate sub-area was not defined.

Issue (Site Submissions Update)

2.128 Representor's assessment suggests lower overall harm rating (moderate) than that presented in the GCGBA (moderate-high) for parcel HI8.

Response

2.129 Table 3.6 of the GCGBA provides benchmark examples of overall harm ratings, with different combinations resulting in different ratings. However, Paragraph 3.131 of the GCGBA stresses that *"rather than simply combining loss of contribution ratings and the impact on adjacent Green Belt ratings in a mechanical/mathematical way, professional judgement was used in each individual case to consider and evaluate how much weight to attach to each contributing element"*. In general, a source of confusion regarding overall ratings may be that the examples given in Table 3.6 are all for cases where the stated level of contribution is to **one** Green Belt purpose. It is noted in paragraph 3.131 that "A stronger contribution to multiple purposes… will typically increase

harm…". This approach has been applied consistently, although moderated by professional judgement rather than automatically deriving ratings from a matrix, so typically the harm rating will be higher than the benchmark example if the contribution rating applies to more than one Green Belt purpose.

40414: Land east of Cambridge Road, Hardwick

Issue (First Proposals Consultation and Site Submissions Update)

2.130 Whilst acknowledging that the GCGBA methodology is logical, the representor's review considers is to be "too complex and confusing", and that "in endeavouring to align their assessment criteria with the 3 Cambridge Green Belt purposes, the criteria used for each Green Belt purpose have become exceedingly complex and are far from being transparent, to the point that they are difficult to comprehend".

Response

2.131 It is recognised that the assessment is detailed, with a stepped analysis process, and that in many cases relatively small parcels of land are identified and rated. However, a number of Green Belt studies in recent years have been criticised at Local Plan Examination as lacking sufficient granularity to support the exclusion of land from consideration for release and development. In our view a simplified analysis would have been open to challenge for not adequately reflecting spatial variations in circumstances.

2.132 We also consider it important to assess harm in relation to the Cambridge Green Belt purposes, which have a long history as the means by which the national Green Belt purposes have been applied locally.

Issue (First Proposals Consultation and Site Submissions Update)

2.133 The methodology for defining parcels has led to instances where parcel boundaries cut across undefined open land. This contradicts NPPF para 143, which states that boundaries should be defined clearly "…using physical features that are readily recognisable and likely to be permanent".

Response

2.134 Assessment parcel boundaries are not the same thing as proposed Green Belt boundaries. An adherence to the definition of parcels only where there are existing physical features would mean that the resulting parcels would not adequately reflect variations in contribution to the Green Belt purposes in Greater Cambridge.

2.135 Large arable fields are a characteristic of this area, and often there can be a significant difference in the degree of urbanising influence within the same field, depending on distance from the urban edge. As explained in para 3.53 of the methodology, "Such boundaries should be recognised as representing a gradual rather than precise or marked change".

2.136 Absence of an existing readily recognisable physical feature is not in itself a reason not to define a new Green Belt boundary in a particular location. Many Green Belt boundaries are defined by newly created physical features such as the boundaries of new residential curtilages, new roads or newly planted woodland belts or hedgerows.

Issue (First Proposals Consultation and Site Submissions Update)

2.137 Representation disagrees with the way the criteria provided in paragraphs 3.31-3.35 are used in Table 3.4 and suggests that a gap of 2-2.5km between settlements should be considered a ‘wide’ rather than ‘moderate’ gap.

Response

2.138 The methodology makes it clear (at para 3.106) that it is not just the physical size of the gap that is relevant to perceived separation of settlements. A degree of judgement is involved in each individual assessment: there are no fixed distance definitions for terms such as ‘moderate’ or ‘wide’.

Issue (First Proposals Consultation and Site Submissions Update)

2.139 Referring to recent case law the representor’s critique suggests that there is an over emphasis in the CGGBA on the volumetric (spatial) element of openness rather than both spatial and visual aspects.

Response

2.140 The analysis for each parcel under the heading ‘Parcel location and openness’ does focus on spatial openness – that is, the presence or otherwise of inappropriate development – but visual openness is an important consideration at Step 3 in the assessment process, the analysis of ‘distinction’ between urban and open land.

2.141 This is explained in paragraph 3.37: “Green Belt openness relates to lack of ‘inappropriate built development’ rather than to visual openness; thus, both undeveloped land which is screened from view by landscape elements (for example tree cover) and development which is not considered ‘inappropriate’, are still ‘open’ in Green Belt terms. Visual openness is however still relevant when considering the degree of distinction between an urban area and the wider countryside – this is addressed at Step 3 below”.

Issue (First Proposals Consultation and Site Submissions Update)

2.142 The representation disagrees with the statement (in paragraph 3.113 of the GCGBA) that “Although the nature of development on released land could have some bearing on the strength of adjacent retained Green Belt land, it is unlikely to radically alter assessment outcomes”. This is because: “This statement suggests that no matter how effective boundary strengthening to a developed parcel could be, it would have no overall material effect on the assessment of harm to the adjacent Green Belt land”.

Response

2.143 This is a misreading of paragraph 3.113. It is acknowledged in the sentence preceding the one quoted above that “there is potential for mitigation measures such as **boundary strengthening** [emphasis added] and density of development within an inset area to influence” the level of adverse impact on retained Green Belt land. The quoted sentence was intended just to suggest that potential mitigation measures relating to the form/character of built development are less likely to reduce harm than measures which would strengthen the boundaries between urban and open land.

2.144 At Chapter 5, where the GCGBA discusses generic mitigation measures for reducing harm, it is stated (para 5.10) that “There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect

the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area".

2.145 The GCGBA does not comment on the potential level of mitigation that could be achieved by specific development proposals – this is not a straightforward judgement given the timescale required for landscaping measures to take effect, and the varying degrees of certainty surrounding different development proposals – although it is fair to say that the higher the assessed level of harm the stronger the mitigation measures would need to be to in order to offset the impact of release and development of land.

Issue (First Proposals Consultation and Site Submissions Update)

2.146 The statement (GCGBA para 3.129) that "…the harm rating given to a parcel or sub-area of it should be assumed to apply to any strategic scale release of land within that area" implies that the release of part of a parcel will cause the same harm as release of an entire parcel and takes no account of potential mitigation measures.

Response

2.147 In general terms it is clear that a larger release of land will potentially cause more harm to land in the Green Belt than release of a smaller subset of that area. However, harm **to the Green Belt purposes** is a broader categorisation which is considering the relationship between released land and the remaining Green Belt. A narrow (50m for example) strip of land adjacent to an urban edge could be considered to have a stronger relationship with the urban area than land 200m away, but if the former lacks any significant boundary feature then harm will often be in the same category on the 5-point scale used. As noted above, mitigation measures could potentially reduce harm.

Issue (First Proposals Consultation)

2.148 Representation says that “There are examples where the overall harm given to a parcel by LUC does not match the examples/criteria provided in Table 3.6 and equally where no details are provided to justify the judgement”.

Response

2.149 No examples of this are provided, but a source of confusion regarding overall ratings may be that the examples given in Table 3.6 are all for cases where the stated level of contribution is to **one** Green Belt purpose. It is noted in paragraph 3.131 that “A stronger contribution to multiple purposes… will typically increase harm…”. This approach has been applied consistently, although moderated by professional judgement rather than automatically deriving ratings from a matrix, so typically the harm rating will be higher than the benchmark example if the contribution rating applies to more than one Green Belt purpose.

Issue (First Proposals Consultation and Site Submissions Update)

2.150 No information is provided in the assessment of the individual parcels that explains how the parcel boundaries are defined.

Response

2.151 The methodology makes it clear (see GCGBA para 3.7) that parcel boundaries reflect identified variations in contribution to the Green Belt purposes rather than being pre-defined, the risk with the latter approach being that variations will be masked.

Issue (First Proposals Consultation and Site Submissions Update)

2.152 With regards to the assessment of Green Belt parcels to the east of Hardwick, it is suggested that the flatter ground that all but the south-eastern part of HA4 occupies should have been assessed separately to the more sloping south-eastern corner, and that there is no justification for the location of the boundary between HA4 and HA8.

Response

2.153 Although the slope is more marked in the south-east of the site there is still a west-east fall that creates some additional distinction from the settlement beyond that already provided by Cambridge Road and associated tree cover. This is an expansive arable landscape that we consider has strong distinction from urban development. Where the slope is even more marked, associated with the lower slopes of the Bin Brook valley, land has been assessed as part of parcel HA8 instead. It is landform rather than physical boundaries such as hedgerows that has resulted in the boundary between the two parcels.

Issue (First Proposals Consultation and Site Submissions Update)

2.154 How can the urbanising influence of properties along the Cambridge Road result in an assessment of moderate distinction for parcel HA5 and the same not apply with regard to the urbanising influence of development on St Neots Road in parcel HA4? Considering also the lack of slope in most of HA4 the parcel should be rated as having ‘moderate’ rather than ‘strong’ distinction from the urban area, and as a result there should be lower contribution ratings for Purposes 2 and 3 and lower overall harm.

Response

2.155 The development alongside St Neots Road in HA4 is noted in the parcel assessment as diminishing openness locally but in the context of the large and visually open adjacent fields the houses are not a strong urbanising influence. The representor's critique also cites traffic noise as an urbanising influence but we consider this to be a conflation of Green Belt assessment with landscape character assessment. Whilst road noise may affect tranquillity it is not an exclusively urban phenomenon. With regard to Purpose 2 we stand by our assessment of strong distinction and 'moderate' contribution.

2.156 With regard to Purpose 3: as previously stated there is no fixed definition for a 'moderate' gap, but it is more than just a question of physical distance. The general visual openness of the landscape in this area is a significant factor. There is visual screening from tree cover close to Madingley but the A428 and St Neots Road provide links that reduce perceived separation, and the presence of intervening urbanising development on St Neots Road does likewise. The analysis for this parcel should ideally have provided a little more analysis to explain this judgement, but we stand by the rating given.

Issue (First Proposals Consultation and Site Submissions Update)

2.157 The GCGBA analysis of impact on adjacent Green Belt for parcel HA4 states that development would significantly weaken the strong boundary distinction; however, the earlier analysis of distinction describes this as a 'moderate' boundary.

Response

2.158 Our choice of the word 'strong' was a typographic error, but we nonetheless consider the loss of the clear and consistent boundary along

Cambridge Road in combination with impact on the distinction of adjacent Green Belt land to warrant the minor-moderate harm rating that was given.

Issue (First Proposals Consultation and Site Submissions Update)

2.159 Representation suggests that release of the site would not weaken the gaps between Hardwick and Coton/Madingley.

Response

2.160 We believe that the release of this area of land in this open arable landscape, taking into consideration the nature of separation/linkage between the settlements (see paragraph 2.122 above), would have an adverse impact on gap strength.

Issue (Site Submissions Update)

2.161 The Representation suggests that the contribution of parcel HA4 to Purpose 2 should be relatively limited rather than moderate. The appraisal quotes the following exemplar form Table 3.3. of the GCGBA: *"Land use is not associated with an inset settlement, land is open and does not have a strong distinction from an inset settlement, and therefore has some rural character, it may also form/contain limited features/aspects that contribute to the quality of Cambridge's setting"*.

Response

2.162 Its position on the gault clay ridge, combined with a rural character, is considered enough to warrant a 'moderate' contribution rating. Table 3.3 of the

GCGBA also includes the following exemplar for moderate contribution to purpose 2 which is relevant to parcel HA4 "*Land use is not associated with an inset settlement, land is contribution open and it has a strong distinction from any inset settlements, to purpose and therefore has a strong rural character; it may also form/contain limited features/aspects that contribute to the quality of Cambridge's setting"*.

40501: Land at Bush Lane, Comberton

Issue (First Proposals Consultation)

2.163 Representor's Green Belt assessment was carried out prior to the GCGBA and do so does not take issue with it. However, it suggests a limited contribution to all of the NPPF Green Belt purposes and no impact on the openness of the wider Green Belt.

Response

2.164 The GCGBA rated this parcel as 'moderate' harm, including a minor level of impact on adjacent Green Belt. The representor's assessment focuses more on impact on the wider Green Belt than on the loss of contribution of the land that would be developed.

40516: Land west of Ditton Lane, Fen Ditton

Issue (First Proposals Consultation)

2.165 Representation suggests that proposed development site (which spans parts of parcels FD4 and FD5) makes a weak contribution to Cambridge Purpose 1 because Fen Ditton, although connected to the City of Cambridge, is classified as a separate settlement in the hierarchy.

Response

2.166 The physical separation between Fen Ditton and Cambridge is so small that expansion of Fen Ditton in FD4 and FD5, even though it would not reduce that physical gap, would still be associated with the City. The fact that Fen Ditton has a distinct character, and is classified as a separate settlement in the hierarchy, does not negate the impact on the City's compact character but has limited the contribution to Purpose 1 to 'relatively significant. Had there been a stronger relationship with Cambridge the rating for FD5's contribution would have been 'significant'.

Issue (First Proposals Consultation)

2.167 Representation suggests that proposed development would have a minimal impact on Cambridge Purpose 2 and, through careful design, could achieve a positive impact. It is noted that the proposals would be landscape-led, with significant areas of GI and public open space, and would include a landscaped edge along the A14.

Response

2.168 Both FD4 and FD5 were rated as making a 'relatively significant' contribution to Purpose 2 because of their role in preserving Fen Ditton's rural character as perceived on approach from the east and north-east, despite its proximity to Cambridge. Urbanising development diminish this rural character.

2.169 The GCGBA did not assess the potential level of mitigation that could be achieved by specific development proposals – this is not a straightforward judgement given the timescale required for landscaping measures to take effect, and the varying degrees of certainty surrounding different development proposals and their mitigation measures. The methodology recognises (at para 3.113) that "…there is potential for mitigation measures such as boundary strengthening and density of development within an inset area to influence [the level of adverse impact on retained Green Belt land]".

Issue (First Proposals Consultation)

2.170 Representation suggests that the proposed development site makes no contribution to Cambridge Purpose 3 due to the size of the gap between Fen Ditton and Stow-cum-Quy and the barrier role of the A14.

Response

2.171 It is recognised that the gap between Fen Ditton and Stow-cum-Quy is wide, but the open, low-lying arable landscape within it, which contributes to FD5's strong distinction from Fen Ditton, reduces perceived settlement separation. The A14 is cited as a separating feature, but its role in this respect is limited because it can also be seen as a providing a fast connection between the villages (and between Stow and the north-eastern edge of the City). Development associated with Fen Ditton that is perceived from the A14 would,

therefore, contribute to the perceived merger. In this context a 'moderate' contribution rating is in our view correct.

2.172 The harm ratings assigned to FD4 and FD5 reflect, in addition to the loss of contribution to Green Belt purposes, take into consideration the impact on release on adjacent land. In this instance it is noted that adjacent land to the east (which is already close to the Marleigh development) would be weakened although, as noted above, this does not take into consideration the potential for mitigation measures to limit harm.

40546: Land to the east of Haverhill Road, Stapleford

Issue (First Proposals Consultation)

2.173 The GCGBA is not robust because it fails to assess sites against the five NPPF Green Belt purposes.

Response

2.174 The approach of assessing the three Cambridge Green Belt purposes as a local application of the NPPF purposes is considered robust and adequately justified in the GCGBA. The Cambridge Green Belt purposes were considered sound by the Inspectors of the Cambridge and South Cambridgeshire Local Plans in 2018.

Issue (First Proposals Consultation)

2.175 The study should be updated to assess smaller parcels of land proposed for housing (including that part of parcel GS8 that is covered by the proposed site).

Response

2.176 As stated in para 3.128 of the GCGBA a minimum parcel size of 1 hectare was used in the study. Parcel GS8 would, therefore, have been subdivided had it been felt that any part of it larger than 1 hectare could be released with lower harm to the Green Belt purposes. The GCGBA is a comprehensive assessment of potential harm of Green Belt release across all of Greater Cambridge, rather than an assessment of specific development proposals (as stated in para 1.7 of the GCGBA).

Issue (First Proposals Consultation)

2.177 The representor's assessment presents qualitative findings in relation to each NPPF Green Belt purpose which take into consideration new landscape planting and the proposed South East Cambridge Transport Route. The busway and proposed landscape features are cited as limiting impact on the Green Belt.

Response

2.178 The proposed busway was not sufficiently 'committed' to consider as part of the GCGBA and, as noted in the assessment methodology, site-specific development and landscaping proposals were not taken into consideration either. We note, however, that the proposed busway route runs between the site and the inset settlement at Stapleford, and so would not contain new

development from the adjacent countryside. We stand by our assessment of harm for parcel GS8.

40547: Land east of Cambridge Road, Sawston

Issue (First Proposals Consultation)

2.179 The GCGBA is not robust because it fails to assess sites against the five NPPF Green Belt purposes.

Response

2.180 The approach of assessing the three Cambridge Green Belt purposes as a local application of the NPPF purposes is considered robust and adequately justified in the GCGBA. The Cambridge Green Belt purposes were considered sound by the Inspectors of the Cambridge and South Cambridgeshire Local Plans in 2018.

Issue (First Proposals Consultation)

2.181 The study should be updated to assess smaller parcels of land proposed for housing (including that part of parcel SA22 that is occupied by the site).

Response

2.182 As stated in para 3.128 of the GCGBA a minimum parcel size of 1 hectare was used in the study. Parcel SA22 would, therefore, have been

subdivided had it been felt that any part of it larger than 1 hectare could be released with lower harm to the Green Belt purposes. The GCGBA is a comprehensive assessment of potential harm of Green Belt release across all of Greater Cambridge, rather than an assessment of specific development proposals (as stated in para 1.7 of the GCGBA).

Issue (First Proposals Consultation)

2.183 Representor's assessment does not provide ratings but key points are i) that development of a new green buffer on the western side of the site will ensure the Sawston and Stapleford remain separate, ii) that containment by existing and proposed boundaries will prevent significant encroachment on the countryside, and iii) that the site performs no function in relation to preserving historic setting and character.

Response

2.184 Landscaping proposals were not taken into consideration in the GCGBA. It is acknowledged that in principal these could reduce harm to the Green Belt purposes, but in our view the representor's assessment downplays the impact of loss of openness on the countryside and on the gap between Sawston and Stapleford.

2.185 Considering the well-established evidence outlining the qualities of Cambridge, and the role of rural character in contributing to its setting, it also downplays impact on NPPF Purpose 4 (setting and special character, applied locally as Cambridge Green Belt Purpose 2). We stand by our assessment for parcel SA22, and also note that the site area plan includes land in OA6, where harm of release is rated as 'very high'.

47647: Land to the east of Horningsea Road, Fen Ditton

Issue (First Proposals Consultation)

2.186 Representor's assessment suggests that parcels FD4 and FD5 (containing most of the site area) make only a weak contribution to Cambridge Purpose 1 as they are located to the east of Fen Ditton (the opposite side to Cambridge) and would be contained by the A14 and new landscaping.

Response

2.187 The fragility of Fen Ditton and Barnwell's separation from Cambridge is such that development in this area cannot be considered unrelated to the city. Expansion would to a degree be associated with the spread of Cambridge, not just of Fen Ditton, so we stand by our rating. The containing role of any proposed landscaping was not taken into consideration in the GCGBA.

Issue (First Proposals Consultation)

2.188 Contribution to Purpose 2 is stated in the representation as being minimal because development would "add to this necklace pattern of development and respond positively to the character, landscape and heritage of the area".

Response

2.189 The small village character of Fen Ditton is in very close proximity to Cambridge and is considered important to the city's setting. The containing role of any proposed landscaping was not taken into consideration in the GCGBA,

as it was outside of the scope of the study to consider specific development proposals (as stated in para 1.7 of the GCGBA), but expansion on the scale proposed would be likely to have a significant impact on the city's setting, regardless of design merit.

Issue (First Proposals Consultation)

2.190 It is suggested in the representation that in relation to parcel FD5 there is no contribution to Purpose 3, due to the width of the gap, the intervening role of the A14 and the existing proximity of development to the south of High Ditch Road.

Response

2.191 Although the A14 is a significant separating feature between Fen Ditton and Stow cum Quy development close to it (within parcel FD5) would increase perception of loss of settlement separation for those travelling along it between Cambridge and Stow. The containing role of any proposed landscaping was not taken into consideration in the GCGBA.

51610: Land off Shelford Road, Fulbourn

Issue (First Proposals Consultation)

2.192 The GCGBA approach to defining assessment areas means that areas with different degrees of enclosure may be included in the same parcel. This leaves "a 'gap' in determining judgements at a more site specific scale, where a given land parcel (as defined by the Green Belt study), may not accurately reflect the attributes of the landscape which are present on the ground, and

where those attributes might contribute to the capacity of the landscape to accommodate some form of development".

Response

2.193 If an assessor thought that variations in the degree of enclosure gave rise to a different level of Green Belt harm then a parcel would have been split. It was not considered necessary to subdivide assessment areas any more than was needed to reflect variations in contribution and harm, other than in cases where it was felt that splitting a parcel would make the explanatory assessment text clearer.

Issue (First Proposals Consultation)

2.194 The representation suggests that the line separating parcel FU14 from FU16 is, in the absence of any physical boundary feature, an arbitrary one which could have been drawn further south.

Response

2.195 Parcel's FU14 and FU16 were both rated 'high' for overall harm, although within this there was one difference in the components ratings: FU16 was rated 'moderate' for distinction, leading to a 'moderate' contribution rating for Purpose 1, whereas FU14 was rated 'strong' for distinction, leading to a 'relatively significant' contribution rating for Purpose 1.

2.196 It is accepted that there is not a precise line beyond which distinction changes from 'moderate' to 'strong', but it was considered worthwhile to reflect this variation by defining two parcels. Large arable fields are a characteristic of this area, and often there can be a significant difference in the degree of urbanising influence within the same field, depending on distance from the urban edge, so parcel boundaries sometimes cross open fields. This scenario

was recognised in the assessment methodology: as explained in para 3.53 “Such boundaries should be recognised as representing a gradual rather than precise or marked change”.

2.197 In the specific case of FU14 and FU16 the boundary was drawn to connect the outer edges of adjacent inset settlement – hence the description of land in FU16 as having “some degree of containment by inset development”.

Issue (First Proposals Consultation)

2.198 The representation suggests that the detailed assessment methodology is not reflected in the analysis of harm for parcel FU16, and that the level of harm has been overstated. The terminology ‘moderate’ contribution and ‘minor-moderate’ impact on adjacent Green Belt is out of step with the ‘high’ overall harm rating. Harm should be ‘low’ or ‘moderate’ or somewhere in between.

Response

2.199 We recognise that the naming convention used in the rating scales for level of impact on adjacent Green Belt means that most parcels have only a minor or minor-moderate rating, but this does not reflect any error or inconsistency in the application of the methodology.

2.200 Although ‘minor-moderate’ is at the lower end of the scale, it is not at the lower end in terms of ratings assigned to different parcels across the study (where ‘minor’ is the most typically rating and levels of harm above ‘minor-moderate’ are rare). It is also important to note the following:

- That the impact on the adjacent Green Belt is **additional** to the harm caused by loss of contribution of land released for development; this is indicated in the methodology (para 3.140) and in the wording of the ‘Overall harm of Green Belt release’ summary in each individual parcel assessment.

- That the harm rating examples given in Table 3.6 are all for cases where the stated level of contribution is to **one** Green Belt purpose. It is noted in para 3.131 that "A stronger contribution to multiple purposes… will typically increase harm…". This approach has been applied consistently, although moderated by professional judgement rather than automatically deriving ratings from a matrix, so typically the harm rating will be higher than the benchmark example if the contribution rating applies to more than one Green Belt purpose.

2.201 The 'high' harm rating given to parcel FU16 is consistent with the assessment methodology, reflecting principally the very visually open nature of the landscape here and the presence of roads that form a clear settlement boundary which would be breached by new development in the site. Contribution to Purpose 1 increases with distance from Fulbourn but not enough to raise overall harm from 'high' to 'very high' within FU14.

58243: Land at Fulbourn Hospital

Issue (First Proposals Consultation)

2.202 Representation suggests that the extent of development at Fulbourn Hospital, in particular in the northern part of parcel CHI5, means that it should be removed from the Green Belt. A revised boundary is suggested.

Response

2.203 Although there are urbanising influences these do not significantly diminish the positive role that most of open land within the parcel plays, as part of the Fulbourn Hospital Conservation Area, in contributing to Cambridge's historic setting. Although the southern part of the parcel has less built development, there is land all over the Conservation Area that is identified in its appraisal ('Fulbourn and Fulbourn Hospital Draft Conservation Area Appraisal

and Management Plan' – January 2021) as 'important open space' or an 'important tree group' (see map on page 26). It is considered that these trees and open spaces give the parcel a distinct character which is less urban than land to the west of Yarrow Road, and which makes a 'moderate' contribution to maintaining and enhancing the quality of Cambridge's setting (Purpose 2).

2.204 Having said this, it is recognised that the Tesco Superstore site, which lies outside of the Conservation Area, is entirely occupied by built development and hard surfacing and is over 1ha in area. This means that, in accordance with paragraph 3.40 of the GCGBA, it should have been defined and mapped as an area of 'no openness' and excluded from the parcelling process. This has no bearing on the assessment for the remainder of the parcel.

2.205 A group of houses in the south-western corner of parcel CH15 also lies outside of the Conservation Area, but these occupy too small an area to identify for exclusion from the parcelling process.

58794: Land to the north of M11 and west of Hauxton Road, Trumpington

Issue (First Proposals Consultation)

2.206 Representation suggests that parcel TR6, of which the site forms a part, should have been subdivided to reflect the distinction between agricultural land and land in Trumpington Meadows Country Park. It suggests that the Country Park part of the parcel scores higher than the agricultural part that the site lies within.

Response

2.207 There is some distinction in landscape character between the country park in the west/north of TR6 and the agricultural land in the east/south but this does not translate to a difference in ratings with regard to the Green Belt purposes. Both parts of the parcel share a similar relationship with the prominent urban edge of Trumpington, and both have a degree of containment from the wider Green Belt (from the M11 to the south and from the wooded Cam valley to the west). The release of any land in the parcel would in turn weaken the remaining open space between Trumpington and the River Cam and M11.

Issue (First Proposals Consultation)

2.208 The site's development masterplan proposes to retain much agricultural land and to create a strong new Green Belt boundary zone between the development and the M11 that would, in combination with the proposed new Park and Ride to the south of the M11, prevent any future urban sprawl or encroachment on the countryside.

Response

2.209 The GCGBA did not assess the potential level of mitigation that could be achieved by specific development proposals – this is not a straightforward judgement given the timescale required for landscaping measures to take effect, and the varying degrees of certainty surrounding different development proposals. The methodology recognises (at para 3.113) that "…there is potential for mitigation measures such as boundary strengthening and density of development within an inset area to influence [the level of adverse impact on retained Green Belt land]".

2.210 The site masterplan was not reviewed as part of the GCGBA but, with regard to the representation's comments about maintaining a boundary between the development and the M11, we would note that the TR6 assessment identified the impact on land to the north as more of a concern than the impact on land to the south of the motorway.

2.211 Development proposals such as the Park and Ride mentioned in the representation were not taken into consideration in the GCGBA as there are too many uncertainties and potential permutations to carry out a meaningful cumulative harm assessment without first having identified a shortlist of potential allocations.

59410: The Boundary, High Street, Horningsea

Issue (Site Submissions Update)

2.212 The Representor's letter suggests that the *"the recent greenways and traffic calming construction at the Southern end of Horningsea introduces additional urbanisation to the village settlement boundary, in turn strengthening the parcels relationship with the inset area"* and that *"parcel H05 is very capable of being considered to afford Limited / No contribution to either, or both, of Purposes 2 and 3, with the resultant effect that the Overall Harm classification could be considered to be Low".*

Response

2.213 The GCGBA rated harm of release of this site as 'moderate' (the second lowest rating on the 5-point scale employed). The site retains enough rural character to make some contribution to Cambridge's rural setting (Cambridge

Green Belt Purpose 2), and to the gap between Horningsea and Stow cum Quy (Green Belt Purpose 3).

200759: Land at Girton Road

Issue (Site Submissions Update)

2.214 It is suggested that a site-specific assessment would more accurately determine harm to the Green Belt purposes from release of the site, because it is significantly smaller than the assessment parcel (GI18) defined in the GCGBA.

Response

2.215 As stated in para 3.128 of the GCGBA a minimum parcel size of 1 hectare was used in the study. Parcel GI18 would, therefore, have been subdivided had it been felt that any part of it larger than 1 hectare could be released with lower harm to the Green Belt purposes.

Issue (Site Submissions Update)

2.216 In relation to Cambridge Purpose 1, there are opportunities to enhance the tree cover around the assessment parcel to further limit the impact of development on Green Belt land beyond.

Response

2.217 The GCGBA is a comprehensive assessment of potential harm of Green Belt release across all of Greater Cambridge, rather than an assessment of specific development proposals (as stated in para 1.7 of the GCGBA). It should also be noted that the parcel's 'relatively significant' contribution rating for Purpose 1 (not 'relatively significant harm' as stated in the representation) is associated with its strength of distinction from the adjacent urban area, not any lack of containment from the wider Green Belt.

Issue (Site Submissions Update)

2.218 It is suggested that the size of the site in relation to the size of the gap between Girton and Histon justifies a weaker rating for Purpose 3.

Response

2.219 There are no strong separating features in the gap between Girton and Histon, and any development occupying part of the parcel would in turn weaken the integrity of the remainder.

200829: Land East of Bridge Road, Histon

Issue (Site Submissions Update)

2.220 Does not directly challenge GCGBA ratings but suggests i) a degree of containment (between urban edges and the Cambridge Guided Busway) that limits the site's relationship with the wider countryside, and ii) that the A14 and open land around the nearby hotel play more significant roles in perceived

settlement separation than the promoted site. It is accepted that the site does play some role in separation between Cambridge and Histon but that there is scope for mitigation to limit any harm in this regard.

Response

2.221 Any development on the site would have some increased urbanising influence on land beyond the busway and would increase urbanising containment of land in the vicinity of the hotel. Although the elevated A14 creates a degree of visual separation between Cambridge and Histon the development would strengthen the connection between the settlements, particularly as perceived along the busway.

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