

Greater Cambridge Green Belt Assessment

Response to CBC submission on justification
for realigning Granham's Road

**South Cambridgeshire District Council and
Cambridge City Council**

Final report

Prepared by LUC

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Chapter 1

Introduction

1.1 Greater Cambridge (South Cambridgeshire District Council and Cambridge City Council) has asked LUC to provide comments on the Green Belt aspects of an analysis submitted by the Cambridge Biomedical Campus (CBC) in support of proposals to realign the northern end of Granham's Road, adjoining Babraham Road. The analysis, produced by Quod in January 2024, is titled 'Realignment of Granham's Road' (abbreviated in this document to RGR) and addresses the impact of the realignment, and associated Green Belt boundary change and additional development, on the Cambridge Green Belt.

1.2 Granham's Road in this location would mark the boundary of the Green Belt as proposed in the Greater Cambridge Local Plan First Proposals (area S/CBC-A as shown on Figure 28 in the First Proposals - reproduced in Figure 1.1 below). The proposed realignment of Granham's Road (also shown below, in Figure 1.2) would be accompanied by the removal of the intervening triangle of land (shaded light yellow on Figure 1.2) from the Green Belt, and use of this area for further development and associated landscaping works.

1.3 Chapter 2 below sets out the key points raised in RGR, with LUC's comments. Reference is made to the findings of 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. Reference should be made to the GCGBA for an explanation of the assessment methodology.

Figure 1.1: Land proposed for development in First Proposals

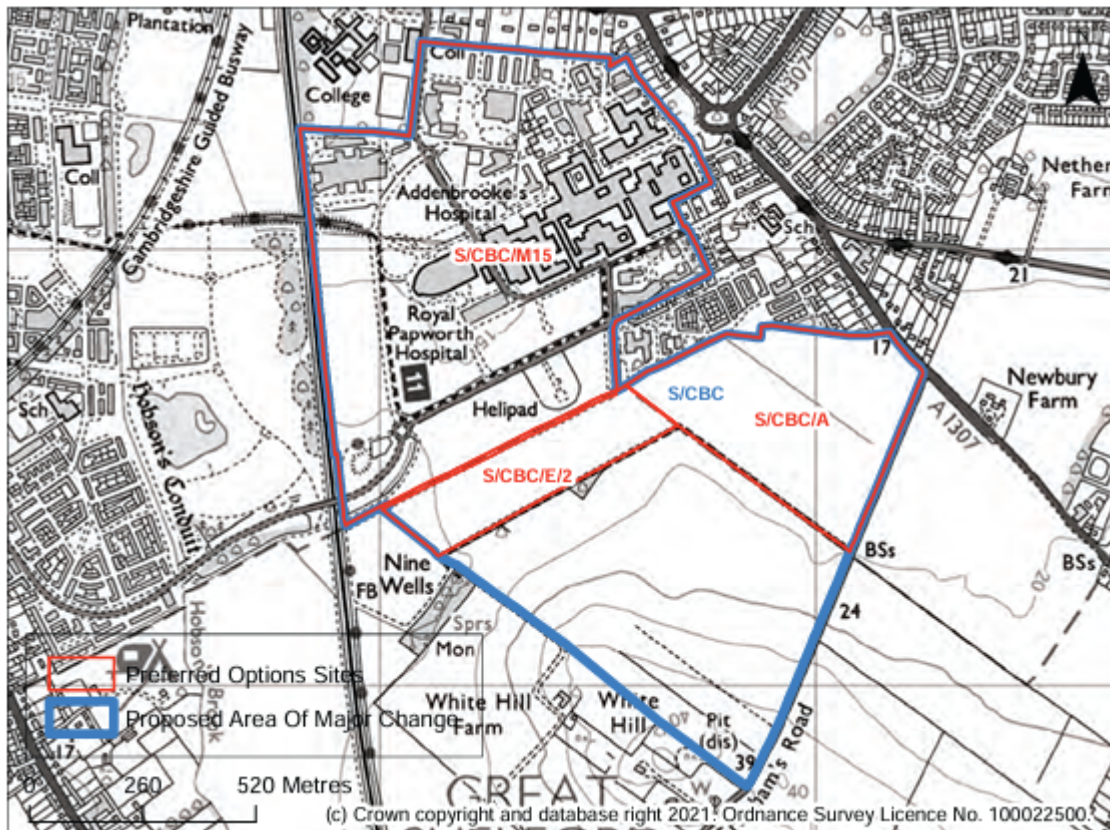


Figure 1.2: Proposed realignment of Granham's Road (from RGR analysis)



Chapter 2

LUC Comments on Realignment of Granham's Road

2.1 RGR considers i) whether there are sufficient benefits to justify realigning Granham's Road, and ii) whether there are exceptional circumstances to realign the Green Belt boundary to match.

Suggested benefits of proposal

2.2 The benefits of the former are grouped under four headings. Three of these – improved highway movement and connectivity; additional floorspace to accommodate health and biomedical science development; and repairing the campus landscape setting – are outside the scope of LUC's consideration, although it does seem questionable that the latter should be considered dependent on road realignment.

2.3 The fourth benefit is stated as being the creation of a more robust Green Belt boundary, with the argument being that realigning the road would create an area of weak Green Belt that would be vulnerable to future development pressure. In this context, including it in the Spatial Framework by developing it and creating a strong landscaped edge is suggested to be a positive thing.

2.4 LUC agrees that the triangle of land would be weakened in Green Belt terms (see paragraph below), but it does not follow that strengthening the new Green Belt edge to compensate for this is a benefit of realigning the road. If the cause of the weakening of the Green Belt is the realignment of the road, then the realignment of the road should not be seen as a benefit that will offset this harm. Instead, the weakening of the GB that would result from road realignment needs to be considered as an adverse impact, to be set against any potential benefits in terms of highways movement and additional campus development.

Assessment of RC11b

2.5 RGR has applied LUC's methodology from the GCGBA in order to assess the harm of Green Belt release that would result from proposals. The GCGBA included land to the south of Granham's Road in assessment parcel RC10, with the land subsequently suggested for release in the First Proposals forming parcel RC11. RC10 was rated 'very high' for harm to the Green Belt purposes in the GCGBA, and RC11 was rated 'high'. For the purposes of the reassessment RGR has renamed RC11 to RC11a and has named the triangle of land now proposed for release (the 'undeveloped wedge' on Figure 2.1 below) as RC11b.

Figure 2.1: GCGBA parcels (amended version of map from GCGBA, taken from RGR analysis)



2.6 In the GCGBA parcel RC10's 'high' harm rating reflected its strong distinction from the urban area. LUC did not identify any smaller parcel in the vicinity of RC11b because, in the absence of any boundary features to separate the RC11b area from the rest of RC10, it was not felt that there would be a sufficient sense of urban containment to warrant this.

2.7 Ratings have been provided in RGR for the different assessment components: degree of distinction from the urban area, contribution to each Cambridge Green Belt purpose, impact on contribution of adjacent land and overall harm. Two scenarios were assessed: i) release of RC11b alongside RC11a, and ii) as an isolated release, assuming RC11a is not released. There is no suggestion that the latter is a realistic scenario, so we have focused on the former. Clearly the suggestion is that RC11a and RC11b would be released as one entity, but the ratings we give would apply equally whether the release was as one or took place as two separate stages.

Impact on distinction from the urban area

2.8 LUC agrees with much of the RGR analysis relating to RC11b (which LUC assessed as part of parcel RC10). If we were to assume that RC11a was developed then RC11b would represent a relatively small area of land partially contained by development (CBC to the west and Eddeva Park to the north) and enclosed to the south by Granham's Road, so its degree of distinction from the urban area would certainly be reduced from the 'strong' distinction that was identified for this area as part of RC10.

2.9 Establishing the degree of reduction in distinction is somewhat dependent on what assumptions are made regarding future development in RC11a, the treatment of the existing Granham's Road (and its associated hedgerows) and the landscaping of the realigned section of road. The GCGBA made the general assumptions that i) land that had been released from the GB but not yet developed would not remain open; ii) physical boundary features marking the edge of site allocations would largely be retained; and iii) future development in the released area would be of a similar scale to adjacent existing development.

If we were to follow these same assumptions then the existing alignment of Granham's Road would remain intact, which clearly would not be the case in reality were the new section of road to be created.

2.10 If we instead assume the removal of existing road and hedging, the creation of a new road with substantial boundary planting (as is suggested in RGR under the heading 'Repair the campus landscape setting') and the construction of large-scale campus buildings, then we would assess the degree of distinction between the urban area and the triangle of land forming RC11b as 'weak'. The RGR analysis suggests that distinction would be reduced from 'strong' to 'moderate'.

Impact on contribution ratings for RC11b

2.11 RGR has assessed the contribution to Cambridge Purpose 1 for this area as 'relatively limited'. Applying the GCGBA methodology, and assuming weak distinction between the urban area and the parcel (as suggested above), we would rate contribution to Purpose 1 as 'moderate'. Table 3.2 in the GCGBA lists factors that determine level of contribution to Purpose 1, and under 'moderate' contribution it includes the scenario "Land is open and close to the main urban area of Cambridge. It has weak distinction from the urban edge." Applying RGR's rating of 'moderate' for distinction would actually equate to a 'relatively strong' contribution to this purpose.

2.12 We agree with RGR's assessment of 'moderate' contribution to Cambridge Purposes 2 and 3.

Impact of release of RC11b on contribution made by adjacent land

2.13 LUC agrees with RGR's rating of 'minor-moderate' for impact on releasing RC11b, assuming RC11a is also released (the rating would be the same even if

RC11b were released in isolation, with RC11a left in the Green Belt). Our key consideration in determining whether there would be a higher level of impact on adjacent Green Belt land is whether there would be a significant impact on the gap between the urban edge and the Park and Ride, but the fact that development at Eddeva Park to the north of Babraham Road will already extend the urban edge as far east as the realigned Granham's Road means that this would not be the case.

2.14 The GCGBA's assessment of parcel RC10 recognised this by stating that "the overall impact on adjacent Green Belt would be minor-moderate for the release of land to the west of Newbury Farm [which marks the eastern edge of Eddeva Park], and moderate for the release of land to the east".

Overall harm of release of RC11b

2.15 RGR's conclusion is that a 'relatively limited' contribution to Purpose 1 and a 'moderate' contribution to Purpose 2 and to Purpose 3, combined with a 'minor-moderate' additional impact on adjacent GB land, equates to 'low' harm'.

2.16 This conclusion is a misapplication of the methodology. In terms of the constituent elements the only one we differ on is that contribution to Purpose 1 should be 'moderate' rather than 'relatively low', and even with those ratings the level of harm has been significantly understated.

2.17 Table 3.6 in the GCGBA (reproduced as Table 2.1 below) provided benchmark examples for harm ratings. The examples that were given were stated in terms of level of harm to a single purpose, but text in paragraph 3.131 stated that a stronger contribution to multiple purposes would typically increase harm. Disregarding the latter text could result in an underestimating of harm, but regardless of this the RGR rating does not tie in with the benchmark examples. Table 3.6 states that a 'moderate' contribution to one GB purpose combined with 'minor' impact on adjacent land would give an overall harm rating of 'moderate', so the 'low' harm suggested is understating the level of impact.

2.18 Table 3.6 also indicates that a 'relatively strong' contribution to one purpose combined with 'minor-moderate' impact on adjacent land equates to 'high' overall harm. RC11b is assessed as making a 'moderate' contribution to all three Cambridge Green Belt purposes, which is considered to equate to a 'relatively strong' contribution to a single purpose, so we would assess the harm of releasing RC11b as 'high'. This rating is logical when considered in terms of the overall release of RC11a and RC11b. Had the course of Granham's Road in 2021 followed the alignment now proposed in RGR then LUC would have used this feature as the logical boundary for RC11 and given the whole parcel a 'high' harm rating, so there is no reason to suggest that the harm of releasing RC11b is less than the harm of releasing RC11a.

2.19 The picture would be different if the assessment was of the additional harm of releasing RC11b as well as RC11a, instead of just releasing RC11a. In this respect, as we have given a 'high' harm rating to both, it could be suggested that there is no additional harm. However, this would be a misinterpretation of what the harm ratings are providing, as harm to the Green Belt is a product not just of harm ratings but of the extent of land released. Clearly the release of a larger area is affecting the Green Belt more than release of a smaller area, but in this case that additional release would not constitute a step-change in terms of impact on the Cambridge Green Belt purposes.

Table 2.1: Benchmark harm ratings (Table 3.6 in GCGBA)

Very high harm

Release of land results in a loss of land which makes a particularly strong contribution to one of the Green Belt purposes, and would constitute at least a minor impact on adjacent Green Belt land; or

Release of land results in a loss of strong contribution to one of the Green Belt purposes, and would constitute a minor-moderate impact on adjacent Green Belt land; or

Release of land results in a loss of moderate contribution to one of the Green Belt purposes, and would constitute a moderate-major impact on adjacent Green Belt land.

High Harm

Release of land results in a loss of strong contribution to one of the Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land; or

Release of land results in a loss of relatively strong contribution to one of the Green Belt purposes, and would constitute a minor-moderate impact on adjacent Green Belt land.

Moderate- high harm

Release of land results in a loss of strong contribution to one of the Green Belt purposes, but would constitute a negligible impact on adjacent Green Belt land; or

Release of land results in a loss of relatively limited contribution to one of the Green Belt purposes, and would constitute a moderate impact on adjacent Green Belt land.

Moderate harm

Release of land results in a loss of moderate contribution to one of the Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land; or

Release of land results in a loss of relatively weak contribution to one of the Green Belt purposes, and would constitute a minor-moderate impact on adjacent Green Belt land.

Low harm

Release of land results in a loss of moderate contribution to one of the Green Belt purposes, and would constitute a negligible impact on adjacent Green Belt land; or

Release of land results in a loss of relatively weak contribution to one of the Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land.

The 'exceptional circumstances' case

2.20 RGR states that the exceptional circumstances for Green Belt release are i) a stronger edge to the City, by being better coordinated with Eddeva Park; ii) the need for additional CBC floorspace; and iii) allowing land to be planned for positively as part of the Spatial Framework.

2.21 The arguments regarding a stronger City edge and planning positively in order to reduce the risk of later unplanned development could be challenged – noting that a strengthening of the Green Belt and GI are already requirements for any release of additional land for CBC development under First Proposals Policy S/CBC. Rounding off the urban edge so that it aligns across Babraham Road would leave a stronger distinction between the new urban edge and the Green Belt in the RC11b area but, as demonstrated in the analysis above, RC11b is not 'weak' Green Belt. It is hard to argue that removing land from the Green Belt, rather than strengthening the boundary along the current alignment of Granham's Road, would in any way strengthen the Cambridge Green Belt. The proposed realignment would create a slightly more direct link to the proposed new southern entrance to CBC, and therefore a shorter Green Belt edge, but the current Green Belt edge could be strengthened similarly albeit perhaps at the expense of some development floorspace.

2.22 RGR's list of exceptional circumstances does not include the improvements to highways movement and connectivity that it suggests would result from the realignment of Granham's Road but, although it is stated that the road could potentially be realigned without altering Green Belt boundaries, the suggested benefits of additional floor space and 'positive planning' are contingent on Green Belt release. Therefore, if there are benefits to highways and connectivity (it is outside of LUC's remit to judge this), then we suggest that they should be taken into account in the exceptional circumstances case.

2.23 To conclude, in weighing up the arguments we would suggest that the harm to the Green Belt purposes that should be taken into account is the 'very high' harm associated with the current contribution of land in RC11b, but that the factors weighing against this harm should be i) the need for additional

floorspace, but also ii) any highways/traffic benefits of road realignment and iii) the lack of significant additional impact on adjacent Green Belt land that would result from development of land in RC11b and creation of a new boundary along a realigned Granham's Road.

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