



Greater Cambridge Green Belt Assessment

Response to comments from Site
Submissions Update and Draft Local Plan
Consultation

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

Final report

Prepared by LUC

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Chapter 1

Introduction

1.1 In October 2025, Greater Cambridge (South Cambridgeshire District Council and Cambridge City Council) published a Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025 (xref). This review addressed challenges to the findings of the Greater Cambridge Green Belt Assessment (the GCGBA - published in August 2021) that were contained in submissions on behalf of promoters of sites putting land forward for development.

1.2 The Councils' October 2025 publication did not respond to any comments relating to national planning policy changes that have occurred since the GCGBA analysis was carried out – notably the introduction of the concept of 'grey belt' in the December 2024 update to the National Planning Policy Framework (NPPF) – or provide revised assessments to take account of any development applications approved since the analysis carried out for the GCGBA.

1.3 A Review of the GCGBA ([see reference 1], henceforth referred to as the GCGBA Review) has now been prepared, in order to implement national Planning Practice Guidance (PPG) in relation to the identification of grey belt and to reassess land parcels potentially affected by developments carried out or approved since the original study. This review also included the reassessment of land parcels affected by developments in the Green Belt approved since the GCGBA analysis.

1.4 Informed by the GCGBA Review, this report responds to representations from the 2025 Site Submissions Update which commented on contribution to the Green Belt purposes in the context of grey belt policy, and/or which refer to developments consented or implemented since the analysis carried out for the GCGBA. It also responds to representations made as part of the Draft Greater Cambridge Local Plan consultation (carried out between December 2025 and

Chapter 1 Introduction

January 2026) which challenge the GCGBA findings or which apply more recent national guidance in relation to the assessment of contribution of land to the Green Belt purposes.

Chapter 2

Green Belt Assessment Issues and Responses

2.1 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, South Cambridgeshire District Council and Cambridge City Council (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. Sites for which grey belt related issues were raised in the Site Submissions Update were identified by the Councils and passed on to LUC for review. These sites are listed in Table 2.1 below.

2.2 A consultation on the Draft Greater Cambridge Local Plan was carried out between December 2025 and January 2026. Responses to this included a number of representations questioning the GCGBA in relation to the contribution of particular sites, being promoted for development, to the Green Belt purposes. LUC was asked to review those representations which were considered by the Councils to include substantive, site-specific comments. These are listed in Table 2.2 below.

2.3 The sites in the tables below are listed by the reference numbers given by the Councils' online consultation system (Opus 2 Consult).

Table 2.1: Sites for which issues raised in Site Submission Update

Representation Reference	Site Name
40041	Land south of Villa Road, Impington
40048	Land at South Trumpington
40061	Land north of Impington Lane, Histon, Cambridge
40079	Silverdale Close, Coton, Cambridgeshire
40096	Cambridge Science Park North
40102	93 Impington Lane, Impington, Cambridgeshire
40192	Land East of Glebe Way, Histon
40217	Land to the east of Ditton Lane, Fen Ditton
40232	Land West of South Road
40236	Land north-east of Villa Road, Impington
40241	Land east of Redgate Road, Girton
40250	Land East of Gazelle Way, Cherry Hinton
40271	Balsham Road, Fulbourn
40283	Land south of High Street, Hauxton
40295	Fulbourn Road, Teversham
40365	Land South of Butt Lane, West of the A10, Milton
40392	Ambrose Way, Impington
40414	Land East of Cambridge Road, Hardwick
40501	Land at Comberton, Cambridge
40546 and 40547	Land East of Cambridge Road, Sawston and Land to the East of Haverhill Road, Stapleford
45674	Hauxton Pits

Representation Reference	Site Name
51530	Land at Beach Road, Cottenham, Cambridgeshire
52726	Wren Park
54906	Land at Rectory Farm, to the North-West of Milton
59397	Land West of Duxford Road, Whittlesford, South Cambridge
59410	The Boundary, High Street, Horningsea, Cambridge
200759	Land at Girton Road, Girton
200768	Land off the High Street, Hauxton, Cambridgeshire
200770	Land to east of Horningsea Road & west of Ditton Lane, Fen Ditton
200772	Barn 3, Park Farm, Villa Road, Impington
200783	Duxford Hub – Land to the north of A505, Duxford
200829	Land east of Bridge Road, Histon
200844	Part of Fulbourn Hospital Site
OS215	Cambridge South

Table 2.2: Sites for which issues raised in Draft Local Plan consultation

Representation Reference	Site Name
40048	Land at South Trumpington
40079	Silverdale Close, Coton, Cambridgeshire
40096	Cambridge Science Park North
40341	Land north of Mill Lane, Sawston
40365	Land South of Butt Lane, West of the A10, Milton

Representation Reference	Site Name
40466	Land off Bannold Road, Waterbeach
52643	Land north of Barton Road and Land at Grange Farm, Cambridge
54906	Land at Rectory Farm, to the North-West of Milton
59397	Land West of Duxford Road, Whittlesford, South Cambridge
200759	Land at Girton Road, Girton
200770	Land to east of Horningsea Road & west of Ditton Lane, Fen Ditton
200829	Land east of Bridge Road, Histon
208861	Bury Farm, Stapleford
OS214 (200967)	Cambridge South

2.4 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 2025 Site Submissions Update or in the 2026 Draft Local Plan Consultation, 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: Land south of Villa Road, Impington

Issue (Site Submissions Update)

2.5 The representation suggests that Impington is a village and not a large built-up area or town, and that NPPF Purposes A and B are not, therefore, applicable.

Response

2.6 As set-out in the GCGBA Review, all three Cambridge Green Belt purposes form elements of NPPF Purpose D, so contribution to Purpose A has not been assessed. However, although Impington is a village it is near-contiguous with the large built-up area of Cambridge, so land is considered to play a role in limiting the expansion of the city, and thus in contributing to preserving “the unique character of Cambridge as a compact, dynamic city” (Cambridge Purpose 1).

2.7 Likewise, NPPF Purpose B has not been assessed and we would agree that Impington should not be considered a town. However, preventing “communities in the environs of Cambridge from merging into one another and with the city” is one of the purposes of the Cambridge Green Belt contributing to protecting the city’s special character and historic setting, and so forms an aspect of the assessment of NPPF Purpose D.

Issue (Site Submissions Update)

2.8 The representation suggests that the absence of a physical, visual, or character relationship with the historic centre of Cambridge means that the Site makes no contribution to NPPF Purpose D.

Response

2.9 The assessment of HI18 in the GCGBA concurred that the parcel “contains no features/aspects that contribute specifically to the quality of Cambridge’s setting”, although the presence of open farmland with some rural character meant that there was a ‘relatively limited’ contribution to “maintain[ing] and enhance the quality of Cambridge’s setting” (Cambridge Purpose 2).

2.10 However, as set-out in the GCGBA Review, all three Cambridge Green Belt purposes form elements of NPPF Purpose D, so their contribution in combination needs to be considered, and the impact that development would have on remaining Green Belt land needs to be factored in. With regard to the latter, the key concern is increased merger of Cambridge and Histon/Impington. The GCGBA rated harm of developing the eastern/northern part of parcel as ‘high’ and harm of development extending into the western part as ‘very high’. ‘High’ and ‘very high’ harm ratings both equate to a ‘strong’ contribution to NPPF Purpose D, on which basis the Site is not considered to lie within grey belt.

Issue (Site Submissions Update)

2.11 The representation suggests that “the provision of appropriate landscape buffers and careful consideration of the design and layout of any built form will prevent impacts to the surrounding Green Belt land.”

Response

2.12 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]”.

40048: Land at South Trumpington

2.13 The issues noted below were raised in the Site Submissions Update and in representations in response to the Draft Local Plan Consultation. FPCR’s Green Belt assessment of January 2026 repeats the analysis contained in their March 2025 assessment. Additional sections include comments on the Greater Cambridge Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025, and on the draft NPPF consultation published in December 2025. Neither introduces any new arguments in relation to the assessment of contribution to the Green Belt purposes.

Issue (Site Submissions Update and Draft Local Plan Consultation)

2.14 Paragraph 6.5 of the Green Belt Assessment (FPCR, March 2025) states “...*there is no development within the parcel itself that has a significant effect on Green Belt openness, however the parcel lies immediately south of the Trumpington Meadows development, which includes up to 4 storey buildings with the occasional taller buildings*”. It goes on to suggest that as the situation on the ground today is notably different to when the LUC was undertaken in 2021 and that “*parcel TR6 is now strongly visually influenced by the existing*

development adjacent to it, and this is judged to affect visual openness”. Paragraph 6.9 reiterates this point, stating *“In terms of distinction the LUC methodology notes at paragraph 3.56 that visual dominance of development within an inset settlement may increase association with that settlement”* and that *“Within parcel TR6, FPCR judge that there is visual dominance from adjacent buildings to parcel TR6, which increases association with Cambridge rather than wider countryside”*, adding *“The Travel Hub when developed will further dilute distinction”*.

Response

2.15 The assessment took account of the larger scale development proposed and the weak boundary separation between it and the parcel. The overall distinction rating considers this, along with topography, distance land in the parcel extends from the urban edge, and the strong views of wider open countryside. This is reflected in the overall moderate distinction which is considered reasonable. See issue below regarding impact of the forthcoming South West Travel Hub.

Issue (Site Submissions Update and Draft Local Plan Consultation)

2.16 Paragraph 6.7 states *“In addition to the M11 and the dual carriageway, further approved built development to the south of the M11 in the form of the Travel Hub, will change the context of parcel TR6 from the time it was assessed”* and that *“The Travel Hub is largely a car park with some buildings, and tall lighting and is not a use that is deemed compatible in terms of openness of the Green Belt”*.

Response

2.17 The impact of the South West Travel Hub has been considered in the GCGBA Review (Chapter 4). It is recognised that the Travel Hub will create a degree of urbanising containment around parcel TR6, which will consequently have weaker distinction from the urban area. Contribution to Cambridge Purpose 1 will, therefore, be lower than was stated in the GCGBA ('moderate' rather than 'relatively significant').

Issue (Site Submissions Update and Draft Local Plan Consultation)

2.18 The Green Belt Assessment provides an assessment against each of the Cambridge Purposes, concluding that the site makes a 'moderate' contribution to Purpose 1 (arguing that it *"has a weak distinction from the urban area due to the influence and partially containment offered by recent development at Trumpington Meadows and the infrastructure of the Travel Hub"*); a 'relatively-limited' contribution to Purpose 2 (arguing that it does not have a strongly rural character owing to the visual influence of development at Trumpington Meadows and the travel Hub; and that it contains no features that contribute specifically to the quality of Cambridge's setting); and a 'relatively limited' contribution to Purpose 3 (arguing that since the LUC study was undertaken, consent has been granted for the Travel Hub).

Response

2.19 As noted above, contribution to Cambridge Purpose 1 will be lower than was stated in the GCGBA: 'moderate' rather than 'relatively significant'.

2.20 In regard to Purpose 2, the parcel's rural character is likely to be reduced to some degree by its additional containment. However, it still forms part of the immediate setting of a Scheduled Monument and therefore it makes some

positive contribution to the character of the landscape and quality of Cambridge's setting. In regard to the second element of Purpose 2, it is acknowledged that the Site is not necessarily prominent within views from St Margeret's Mound but it forms part of an area of open landscape on the edge of the city in views from Chapel Hill where development within the parcel would likely be visible. This is reflected in the 'moderate' contribution rating.

2.21 However, with regard to Purpose 3 the development of the Travel Hub and also, to a lesser extent, the Cambridge Discovery campus in parcel HX12 (planning reference 23/0380/OUT), will significantly weaken existing separation between Cambridge and Hauxton. The substantial loss of open, undeveloped land between the edge of Cambridge (formed by site 40048) and the Travel Hub would reduce the role of the M11 as a gap-strengthening feature and so contribution to Purpose 3 would increase from 'moderate' to 'relatively significant'. The overall harm rating for TR6 is, therefore, unchanged from the GCGBA.

Issue (Site Submissions Update and Draft Local Plan Consultation)

2.22 The Green Belt Assessment argues that there would be a minor impact on adjacent land, suggesting that "*there would be very little impact on the perceived gap between Cambridge and Hauxton, with the M11 forming a very strong boundary, and now with the proposed Travel Hub providing further separation*".

Response

2.23 Regardless of the strength of parcel TR6's outer boundary (formed by the M11 and also the new public transport route and bunding to be located along the edge of TR6), impact on the contribution of adjacent land would be greater than the minor-moderate stated in the GCGBA, as a result of the perceived loss of settlement gap strength.

Issue (Site Submissions Update and Draft Local Plan Consultation)

2.24 As set out above, the Green Belt Assessment argues that there would be a ‘moderate’ contribution to Cambridge Purpose 1, a ‘relatively limited’ contribution to Purpose 2, a ‘relatively limited’ contribution to Purpose 3, and a Minor impact on adjacent land. On this basis it concludes that the harm resulting from its release, as an expansion of Cambridge, would be ‘low’.

Response

2.25 The increased contribution to Purpose 3 and greater impact of development on adjacent Green Belt mean that harm to the Cambridge Green Belt Purposes would still be ‘high’.

2.26 As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘high’ harm rating for parcel TR6 equates to a ‘strong’ contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

Issue (Site Submissions Update and Draft Local Plan Consultation)

2.27 The Green Belt Assessment also presents an appraisal of the Site against the NPPF Purposes, arguing that the Site makes a ‘moderate’ contribution to Purpose A, Purpose B, and Purpose D. Paragraph 8.3 goes onto to state *“FPCR analysis within this report identifies that the land parcel containing the Site does not strongly contribute to these three purposes and so the Site should be considered to be ‘grey belt’”*.

Response

2.28 As set out in the GCGBA Review, all three Cambridge purposes are considered to form elements of NPPF Purpose D. For the reasons stated above, the Site is not considered to lie within grey belt.

40061: Land north of Impington Lane, Histon, Cambridge

Issue (Site Submissions Update)

2.29 The Landscape Capacity and Green Belt review (Tor & Co, March 2025) argues that “... *the Site, a small area of a much wider parcel HI8, was found to make a weak or no contribution to all local Green Belt purposes assessed (equivalent to national purposes b and d)*” and that “*Due to its level of containment and degree which it is associated with the existing settlement, we also consider that parcel HI8 makes a weak or no contribution to Green Belt Purpose A of the National Planning Policy Framework ...*”. It concludes that “*In these terms, we believe that parcel 13 fulfils all national ‘grey belt’ criteria*”. The additional information submitted reiterates this, stating “... *in the context of the NPPF (December 2024), HELAA Site 40061 represents a ‘Grey Belt’ opportunity*”.

Response

2.30 LUC’s response to representations on this site (GCGBA – Response to Comments, 2025) addresses the points made in the representation. This justifies the ‘moderate’ harm rating assigned to the southern part of parcel HI8 in the GCGBA. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘moderate’ harm rating equates to a

'moderate' contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

40079: Silverdale Close, Coton, Cambridgeshire

Issue (Site Submissions Update)

2.31 The Green Belt Assessment (EDP, March 2025) assesses the Site as making 'No contribution' to Cambridge Purpose 1; a 'less than moderate' contribution to Cambridge Purpose 2; and a 'very limited' contribution to Cambridge Purpose 3. In regard to the NPPF Purposes the assessment finds a 'weak or none' contribution to Purpose A, B and D. It then concludes that the Site comprises grey belt, as it does not contribute strongly to NPPF Purpose A, B or D; and it does not fall within, and is not affected by, areas or assets of particular importance as identified in footnote 7.

Response

2.32 LUC's response to representations on this site (GCGBA – Response to Comments, 2025) indicated that the part of parcel CT12 corresponding to the Site should be rated 'low' rather than 'moderate'. The Greater Cambridge Green Belt Assessment 2021 - Errata Note, published in December 2025, acknowledged this amendment. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'low' harm rating equates to a 'weak' contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

Issue (Draft Local Plan consultation)

2.33 The applicant has commissioned an assessment against the NPPF Green Belt purposes, to demonstrate that the Site makes no contribution to any of the purposes relevant to the identification of grey belt.

Response

2.34 As per the response above, we agree that the Site should be considered grey belt. However, as explained in the GCGBA Review, all the Cambridge Purposes are viewed as elements of NPPF Purpose D, so the Site makes a 'weak' contribution rather than no contribution.

40096: Cambridge Science Park North

Issue (Site Submissions Update)

2.35 The call for sites supporting statement (March 2015) makes no argument regarding the contribution of the Site to the Green Belt purposes or the Sites potential to be defined as grey belt.

Response

2.36 The site (call for sites URN 86) falls across six parcels from the GCGBA: HI11, HI12, HI13, HI14, KI1 and OA1. The majority of these have a 'very high' harm rating with those located along the edge of Impington having lower harm ratings - HI12 ('low') and HI14 ('moderate'). As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'very high' harm rating equates to a 'strong' contribution to NPPF Purpose D. On this basis the majority of the Site is not considered to lie within grey belt.

Issue (Draft Local Plan consultation)

2.37 A Green Belt assessment has been undertaken on behalf of the Site promoter. This applies the NPPF Green Belt purposes relevant to the identification of Green Belt (purposes A, B and D) and determines that the Site does not make a 'strong' contribution to any, and so is grey belt. The principal point of difference with the GCGBA is in the extent to which the parcel is limiting the spread of Cambridge, on which it contends that contribution to NPPF Purpose A is limited by a) the strength of the A14 as a boundary to the city; b) the location of the assessment area beyond the A14; and c) the extent of existing urban influence associated with the A14 itself and associated traffic movements, noise and lighting.

Response

2.38 LUC has assessed land against the Cambridge Purposes rather than the NPPF purposes. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D, but it is recognised that Cambridge Purpose 1 has clear similarities to NPPF Purpose A in terms of the factors relevant to its assessment.

2.39 To suggest that the Site plays a limited role in relationship to NPPF Purpose A because it lies beyond the A14, and because the A14 is performing a containing role, does not reflect the fact that a physical feature is not a barrier to urban sprawl if development lies on both sides of it. To perform a containing role it needs to represent a distinction between urban and open land. Currently the A14 is performing a significant containing role because the land beyond it, within and around site 40096, is open. That role would be significantly compromised by development within the Site, so contribution to Cambridge Purpose A is 'strong' and, as a result, contribution to NPPF Purpose D is 'strong' for all but the very small areas in parcels H12 and H14 where ratings assume that development would form an expansion of Impington. Therefore, the Site does not lie in grey belt.

40102: 93 Impington Lane, Impington, Cambridgeshire

Issue (Site Submissions Update)

2.40 The Green Belt Appraisal (Tor & Co, March 2025) argues that the Site is grey belt, stating “*the part of the Site that lies within the Green Belt does not meet the previously developed land test, but this appraisal has concluded the land covered by Green Belt does not strongly contributing to purposes a), b) or d)*”. It also points out that since the GCGBA was completed new residential housing area to the west of the Site (approved planning application S/1486/18/FL) has been built out in full, changing the configuration of the settlement edge and how the Site functions in terms of Green Belt

Response

2.41 LUC’s response to representations on this site (GCGBA – Response to Comments, 2025) acknowledged that this small part (<1ha) of parcel HI8 is more contained by urban edges and therefore that harm from its release would be ‘low’. On this basis the Site is provisionally considered to lie within grey belt.

40192: Land East of Glebe Way, Histon

Issue (Site Submissions Update)

2.42 The supporting letter (Carter Jones, March 2025) argues that NPPF definition of grey belt, together with the new PPG, should be applied to the Site. It argues that as villages should not be considered large built-up areas or towns, then Histon would not be relevant to NPPF Purpose A, B or D. It also adds that

the Site is not covered by any footnote 7 designations, is in a sustainable location and would satisfy the ‘Golden Rules’, before concluding that *“it ... should be categorised as Grey Belt and would not constitute Inappropriate Development in the Green Belt”*.

Response

2.43 The site lies within two parcels of the GCGBA: HI5 to the south-east and west; and HI6 to the north-east. Parcel HI5, located along the settlement edge of Histon, has a ‘moderate-high’ harm rating; and parcel HI6, located away from the settlement edge, has a ‘high’ harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘very high’ harm rating equates to a ‘strong’ contribution to NPPF Purpose D and the ‘moderate-high’ rating to a ‘moderate’ contribution. On this basis part of the Site (to the north-east) is not considered to lie within grey belt, and part of the Site (to the south-east and west) are provisionally considered to lie within the grey belt.

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

Issue (Site Submissions Update)

2.44 The supporting letter (Red Fern, n.d.) provides no detailed analysis around grey belt but simply states that *“sensitively designed scheme that opens up a substantial portion of the land for the public will satisfy the tests for Grey Belt”*.

Response

2.45 The site (as shown on the location plan) lies within the eastern part of parcel FD7 of the GCGBA. The majority of the Site lies within the southern part of this area, which has a 'high' harm rating; a small part of the Site to the north of this area falls has a 'moderate-high' harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'high' harm rating equates to a 'strong' contribution to NPPF Purpose D. On this basis the majority of the Site is not considered to lie within grey belt.

40232: Land West of South Road

Issue (Site Submissions Update)

2.46 The supporting letter (CERES Properties) references the changes to the NPPF in December 2024, in regard to the definition of grey belt. It goes on to reference the PPG and states that this *"confirms that Purpose A, checking the unrestricted sprawl of large built up areas, does not (emphasis added) apply to villages"*. No clear argument is made, but the implication appears to be that as Impington is a village then the NPPF purpose A is not relevant to the Site (No reference is made to Purpose B or D). The letter goes on to argue that significant weight should be given to development proposals which comply with the Golden Rules and that *"Importantly, as set out in the original representations and feasibility plans this proposed site should now be assessed as grey belt and can clearly deliver the significant benefits required by the Golden Rules"*. However, no detail is provided to support the argument that the Site comprises grey belt.

Response

2.47 The site lies within parcel HI18 of the GCGBA, which has a 'very high' harm rating. However, the northern part of the parcel (map area 2) has a 'high' harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'very high' and 'high' harm ratings equate to a 'strong' contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

40236: Land north-east of Villa Road, Impington

Issue (Site Submissions Update)

2.48 The supporting letter (CERES Properties) references the changes to the NPPF in December 2024, in regard to the definition of grey belt. It goes on to reference the PPG and states that this *"confirms that Purpose A, checking the unrestricted sprawl of large built up areas, does not (emphasis added) apply to villages"*. No clear argument is made, but the implication appears to be that as Impington is a village then the NPPF purpose A is not relevant to the Site (No reference made to Purpose B or D). The letter goes on to reference Section 13 and Paragraph 155 of the NPPF and then states that *"Importantly, as set out in the original representations and feasibility plans this proposed site should now be assessed as grey belt and can clearly deliver significant economic benefits in a sustainable location"*. However, no detail is provided to support the argument that the Site comprises grey belt.

Response

2.49 The majority of the Site lies within parcel HI21 of the GCGBA, which has a 'moderate-high' harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'moderate-high' harm rating equates to a 'moderate' contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

40241: Land east of Redgate Road, Girton

Issue (Site Submissions Update)

2.50 The supporting letter (CERES Properties) references the changes to the NPPF in December 2024, in regard to the definition of grey belt. It goes on to reference the PPG and states that this *"confirms that Purpose A, checking the unrestricted sprawl of large built up areas, does not (emphasis added) apply to villages"*. No clear argument is made, but the implication appears to be that as Girton is a village then the NPPF purpose A is not relevant to the Site (No reference made to Purpose B or D). The letter goes on to argue that significant weight should be given to development proposals which comply with the Golden Rules and that *"Importantly, as set out in the original representations and feasibility plans this proposed site should now be assessed as grey belt and can clearly deliver the significant benefits required by the Golden Rules"*. However, no detail is provided to support the argument that the Site comprises grey belt.

Response

2.51 The site lies in parcel GI17, which was assigned an overall harm rating of 'very high'. As set out in the GCGBA Review, all three Cambridge purposes

form elements of NPPF Purpose D and the 'very high' harm rating equates to a 'strong' contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

40250: Land East of Gazelle Way, Cherry Hinton

Issue (Site Submissions Update)

2.52 The Supporting Statement (Strutt & Parker, March 2025) provides a high-level assessment against NPPF Purposes A, B and D. It argues that the Site performs weakly against Purpose A (*"The site is largely enclosed by Teversham, developments west of Fulbourn (including at the former Ida Darwin Hospital and Capital Park) and Cherry Hinton to the east"*), does not contribute to Purpose B (*"the revised PPG confirms that this relates solely to the merging of towns, and not villages"*), and does not contribute to Purpose D (*"The last Green Belt Assessment (LDA, August 2021) published by the Council confirmed the promotion site contributed only moderately to purpose 2 (maintaining and enhancing the quality of Cambridge's setting), reflecting the relatively modern developments to the east of Cambridge (including Cherry Hinton) which already do not contribute to the historic character or setting of the City"*). It concludes that *"As a result of the updated NPPF and PPG and the responses included in the above table, the Site is considered to be Suitable for development"*.

Response

2.53 The representation does not reference the GCGBA, rather the earlier 2021 study by LDA. The site (as shown in the Vision Document) falls across several parcels from the GCGBA: TE7, TE8, CHI1, CHI2, CHI3, CHI4 and FU1. All of these parcels have a 'very high' harm rating, with the exception of CHI3 which has a 'high' harm rating. As set out in the GCGBA Review, all three Cambridge

purposes form elements of NPPF Purpose D and the 'very high' and 'high' harm ratings equate to a 'strong' contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

40271: Balsham Road, Fulbourn

Issue (Site Submissions Update)

2.54 The planning letter states that the Site makes a 'limited' contribution to the Green Belt and could be released to meet the needs for housing and affordable housing. However, no evidence is provided to support this statement.

Response

2.55 The site lies across two parcels from the GCGBA: FU12 to the east, which has a 'moderate-high' harm rating; and FU13 to the west, which has a 'moderate' harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'moderate-high' and 'moderate' harm ratings equates to a 'moderate' contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

40283: Land south of High Street, Hauxton

Issue (Site Submissions Update)

2.56 The representation provides comments on why sprawl and impact on settlement gaps would be limited but also suggests that Hauxton is a village and

not a large built-up area or town, and that NPPF Purposes A and B are not, therefore, applicable.

Response

2.57 As set-out in the GCGBA Review, all three Cambridge Green Belt purposes form elements of NPPF Purpose D, so contribution to Purpose A has not been assessed. Land considered to play a role in limiting the expansion of Cambridge is contributing to preserving “the unique character of Cambridge as a compact, dynamic city” (Cambridge Purpose 1), but Hauxton is too far removed from the city to make any contribution in this regard.

2.58 Likewise, NPPF Purpose B has not been assessed and we would agree that Hauxton should not be considered a town, but preventing “communities in the environs of Cambridge from merging into one another and with the city” is one of the purposes of the Cambridge Green Belt contributing to protecting the city’s special character and historic setting. This means that it forms an aspect of the assessment of NPPF Purpose D.

Issue (Site Submissions Update)

2.59 The representation equates Cambridge Purpose 2 – to maintain and enhance the quality of the city’s setting – to NPPF Purpose D – to preserve the setting and special character of historic towns. It notes that the GCGBA rated parcel HX7 (in which the majority of the Site is located) as making a ‘relatively limited’ contribution to Cambridge Purpose 2.

Response

2.60 As indicated above, all three Cambridge Purposes form elements of NPPF Purpose D. The most significant with regard to this site is Cambridge Purpose 3, because there is a very narrow gap between Hauxton and Little Shelford, but

development within HX7 would not reduce the gap by much. As noted in the GCGBA Review, the harm rating originally stated for HX7 was incorrect and should have been 'moderate'. A 'moderate' harm rating equates to a 'moderate' contribution to NPPF Purpose D, on which basis the part of the Site lying within HX7 is provisionally identified as grey belt.

2.61 It is noted the Site also covers the northern part of parcel HX6 which occupies the narrowest part of the gap and which was assessed as making a 'significant' contribution to Purpose 3 and assigned a 'very high' harm rating. This area is not considered to be grey belt.

Issue (Site Submissions Update)

2.62 It is suggested that there would still be physical and visual separation between Hauxton and Little Shelford, and that there would be opportunity for landscaping along the eastern boundary of the Site to limit impact on the settlement gap.

Response

2.63 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]".

40295: Fulbourn Road, Teversham

Issue (Site Submissions Update)

2.64 The supporting statement (Pegasus, March 2025) references the updated NPPF (2024) and argues that “*the latest Green Belt guidance contained within the revised NPPF will apply when considering any development of this site*”. The statement then goes on to present an assessment of the Site against the NPPF Purposes based on the PPG, and concludes that the Site makes a ‘weak or none’ contribution to Purpose A, B and D.

Response

2.65 The site lies within the central and northern parts of parcel TE6 of the GCGB, east of Fulbourn Road, which has a ‘very high’ harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘very high’ harm rating equates to a ‘strong’ contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

40341: Land north of Mill Lane, Sawston

Issue (Draft Local Plan consultation)

2.66 The promoter’s Green Belt assessment equates Cambridge Purpose 1 to NPPF Purpose A, Cambridge Purpose 2 to NPPF Purposes C and D and Cambridge Purpose 3 to NPPF Purpose B and suggests that to be considered grey belt the Site “must not score significantly” in any of the purposes.

Response

2.67 For the reasons set out in the GCGBA Review, all three Cambridge Purposes are considered to be aspects of NPPF Purpose D, although they have similarities with other NPPF purposes.

Issue (Draft Local Plan consultation)

2.68 An assessment is presented for the Site as a whole, stating that it 'does not contribute' to any of the Cambridge Green Belt purposes and is, therefore, grey belt.

Response

2.69 The site lies within two GCGBA parcels: SA20 and SA21. For SA20 it is noted in the GCGBA Review that there is a discrepancy between the text under the heading 'distinction between parcel and inset area', which states that there is moderate distinction between the parcel and the inset area, and text within the contribution assessment which states that there is a strong distinction. The former is correct, which means that contribution to Purpose 2 should have been stated as 'relatively limited' rather than 'moderate', and contribution to Purpose 3 should have been stated as 'limited' rather than 'relatively limited'. This means that overall harm should have been stated as 'low' rather than 'moderate'. We disagree with the assessment that there is 'no contribution' to any of the purposes, but agree that the land should be provisionally identified as grey belt (as it has been in the GCGBA Review).

2.70 We also disagree with the assessment that parcel SA21 makes 'no contribution' to any of the purposes, but agree that the land should provisionally be identified as grey belt, making a 'weak' contribution to Purpose D (as it has been in the GCGBA Review).

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

Issue (Site Submissions Update)

2.71 The representation suggests that Milton is a village and not a large built-up area or town, and that NPPF Purposes A and B are not, therefore, applicable.

Response

2.72 As set-out in the GCGBA Review, all three Cambridge Green Belt purposes form elements of NPPF Purpose D, so contribution to Purpose A has not been assessed. However, although Milton is a village it is near-contiguous with the large built-up area of Cambridge, so land is considered to play a role in limiting the expansion of the city, and thus in contributing to preserving “the unique character of Cambridge as a compact, dynamic city” (Cambridge Purpose 1).

2.73 Likewise, NPPF Purpose B has not been assessed and we would agree that Milton should not be considered a town. However, preventing “communities in the environs of Cambridge from merging into one another and with the city” is one of the purposes of the Cambridge Green Belt contributing to protecting the city’s special character and historic setting, and so forms an aspect of the assessment of NPPF Purpose D.

Issue (Site Submissions Update)

2.74 The representation suggests that Milton is not a historic town, so it’s relationship with Cambridge is the key consideration. In this respect the

absence of any significant views of Cambridge means that the Site makes only a 'low' contribution to NPPF Purpose D.

Response

2.75 The assessment of MI1 in the GCGBA against Cambridge Purpose 2 concurred that the part of the parcel containing the Site makes a weaker contribution than those parts of the parcel which are open farmland, and no intervisibility with Cambridge is noted.

2.76 However, as set-out in the GCGBA Review, all three Cambridge Green Belt purposes form elements of NPPF Purpose D, so their contribution in combination needs to be considered, and the impact that development would have on remaining Green Belt land needs to be factored in.

Issue (Site Submissions Update)

2.77 The representation makes reference to the approved Cambridgeshire South Police Station development (planning application 20/04010/FUL) and suggests that a more granular assessment of parcel MI1 would have identified areas of lower harm.

Response

2.78 The key concern with MI1 is the breaching of the strong and consistent boundary to the urban area formed by the A10 and associated tree cover, increasing the extent to which development would be viewed as sprawl associated with and reducing the compactness of Cambridge.

2.79 The GCGBA rated harm of developing the parcel as 'very high', but parcel analysis took place prior to the approval of the development of the new

Cambridgeshire South Police Station. The GCGBA Review reviewed findings in light of this development approval and as a result the Site area is now rated 'moderate-high' for harm, with only land north of Butt Lane (beyond the Site boundary) now rated 'very high'. 'High' or 'very high' harm ratings equate to a 'strong' contribution to NPPF Purpose D, on which basis the Site is now provisionally considered to lie within grey belt.

Issue (Draft Local Plan consultation)

2.80 A review of contribution to the NPPF Green Belt purposes carried out for the Site promoter suggests that the Site makes a 'moderate' contribution to NPPF Purpose A, no contribution to Purpose B and a weak contribution to Purpose D, and that development would cause no conflict with Purposes A or B and negligible conflict with Purpose D. On this basis it is suggested that it should be considered grey belt.

Response

2.81 For the reasons set out in the GCGBA Review, all three Cambridge Purposes are considered to be aspects of NPPF Purpose D, although they have similarities with other NPPF purposes.

2.82 The GCGBA Review reviewed findings in light of this development approval and as a result the Site area is now rated 'moderate-high' for harm, with only land north of Butt Lane (beyond the Site boundary) now rated 'very high'. A 'moderate-high' harm rating equates to a 'moderate' contribution to NPPF Purpose D, on which basis the Site is now provisionally considered to lie within grey belt.

40392: Ambrose Way, Impington

Issue (Site Submissions Update)

2.83 The Green Belt Appraisal (EDP, February 2025) states that *"the GCGBA and EDP find a limited contribution to the Cambridge GB purposes and the NPPF 2024 GB purposes ... so that it is concluded that the Site comprises grey belt"*.

Response

2.84 LUC's response to representations on this site (GCGBA – Response to Comments, 2025) addresses the points made in the representation. This justifies the 'moderate-high' and 'moderate' harm ratings assigned for parcel HI8 in the GCGBA. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'moderate-high' and 'moderate' harm ratings equate to a 'moderate' contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

40414: Land East of Cambridge Road, Hardwick

Issue (Site Submissions Update)

2.85 The Green Belt Review (Tor & Co, March 2025) refers to the new PPG and states that *"CCP will be required to assess each parcel against national purposes (i.e not only local Cambridge Greenbelt purposes)"* and that *"the assessment criteria laid down in the LUC assessment do not align with the criteria outlined in the new national guidance"*.

Response

2.86 As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D.

Issue (Site Submissions Update)

2.87 In regard to Cambridge Purpose 3, the appraisal states *“the recent guidance states that, in relation to national greenbelt purpose B (prevent neighbouring towns merging into one another, equivalent to Cambridge Purpose 3) a moderate (not strong) contribution would be ‘being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation’.* A weak contribution are defined as those areas that *‘form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation.’*” It then adds *“Most importantly, however, this purpose is intended to apply to towns only, not villages and so we believe that parcels HA4A / B as described make no contribution to purpose 3”*.

Response

2.88 As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘high’ harm rating equates to a ‘strong’ contribution to NPPF Purpose D. The majority of the Site lies in parcel HA4 but it also encompasses all of the smaller parcel HA5 and a small area of HA8. The GCGBA rated the harm of releasing HA4, HA5 and HA8 as ‘high’, ‘moderate’ and ‘high’ respectively. On this basis the majority of the Site is not considered to lie within grey belt but the 4.14 hectares in HA5 is provisionally identified as grey belt.

2.89 In regard to comments on the PPG ratings for Purpose B, most of the Site has strong distinction from the urban area, relating largely to the sloping landform and visual openness of the land. It is judged as comprising a substantial part of the gap, and would have some resulting loss of visual separation were development to take place. We therefore stand by the ratings for Cambridge Purpose 3.

Issue (Site Submissions Update)

2.90 In its conclusion the appraisal states *“the recently published PPG makes it clear that it may still be possible for authorities to provisionally identify land as grey belt in advance of more detailed specific proposals”* and that *“This is relevant where a finer grain assessment of a smaller site (or small developable area of a much larger parcel) would not result in harm to the remaining greenbelt where adequate provisions for strong defensible boundaries and compensatory measures could be incorporated”*.

Response

2.91 LUC’s response to representations on this site (GCGBA – Response to Comments, 2025) addresses the points made in the representation. This justifies the ‘high’ harm rating assigned in the GCGBA for parcel HA4.

40466: Land off Bannold Road, Waterbeach

Issue (Draft Local Plan consultation)

2.92 A Green Belt assessment produced on behalf of the Site promoter has assessed the two GCGBA parcels that comprise the Site, WA1 and WA2,

against NPPF purposes A, B and D. The assessment concludes that neither parcel makes a 'strong' contribution to any of the relevant purposes and so both should be considered grey belt.

Response

2.93 For the reasons set out in the GCGBA Review, all three Cambridge Purposes are considered to be aspects of NPPF Purpose D, although they have similarities with other NPPF purposes. The GCGBA Review equates a 'very high' or 'high' GCGBA rating for harm from Green Belt release to a 'strong' contribution to Purpose D, a 'moderate-high' or 'moderate' harm rating to a 'moderate' contribution to Purpose D, and a 'low' harm rating to a 'weak/no' contribution to NPPF Purpose D. The GCGBA rated parcel WA1 'low' for harm, and WA2 was rated 'moderate', so on this basis the Site as a whole is now provisionally considered to lie within grey belt.

40501: Land at Comberton, Cambridge

Issue (Site Submissions Update)

2.94 The Green Belt Strategic Site Landscape Appraisal (March 2025) assesses the proposed development of the Site against NPPF Green Belt purposes. It considers that there would be a 'limited Contribution' to Purpose A,B, C and D and concludes that *"the Site does not 'strongly contribute to any of purposes (a), (b) or (d) in paragraph 143', and as such, the Site can be considered 'Grey Belt' land"*.

Response

2.95 The site lies within parcel CO6 of the GCGBA, which has a 'moderate' harm rating. As set out in the GCGBA Review, all three Cambridge purposes

form elements of NPPF Purpose D and the 'moderate' harm rating equates to a 'moderate' contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

40546 and 40547: Land to the East of Haverhill Road, Stapleford and Land North of Cambridge Road, Sawston

Issue (Site Submissions Update)

2.96 The supporting letter (Fisher German, March 2025) argues that *“both sites ... should be identified as grey belt land as they do not contribute strongly to Green Belt purposes a, b) and d) (particularly when regard is had for the updated guidance on Green Belt land provided in the February 2025 PPG)”*. No further analysis is provided to support this statement.

Response

2.97 The majority of site 40547 (as shown on the Site location plan) lies within parcel SA22 of the GCGBA, which has a 'high' harm rating. A smaller parcel in the south of the Site - SA23 – lies along the northern edge of Sawston and has a 'moderate-high' harm rating. Site 40546 (as shown on the Site location plan) lies half within parcel GS8C and half within GS8D, which have 'high' and 'very high' harm ratings respectively. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and 'very high' and 'high' harm ratings equate to a 'strong' contribution to NPPF Purpose D. On this basis the majority of the two sites is not considered to lie within grey belt.

45674: Hauxton Pits

Issue (Site Submissions Update)

2.98 The planning statement (Keymer Cavendish Limited, March 2025) refers to the PPG and highlights that “*villages do not count as ‘large built up areas’*”, that “*preventing coalescence of towns does not relate to villages*”, and that “*the green belt purpose of preserving the setting and special character of historic towns does not relate to villages*”. No clear argument is presented that site is ‘grey belt’, but the implication is that as Hauxton is a village then the NPPF purpose A, B and D are not relevant to the Site.

Response

2.99 We agree that the Site makes no contribution to NPPF Purpose A and Purpose B. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D. The site lies across two parcels from the GCGBA: the majority of the parcel within HX8, which has a ‘very high’ harm rating; and the northern portion within HX10, which has a ‘moderate’ harm rating. The ‘very high’ rating equates to a ‘strong’ contribution to NPPF Purpose D, and the ‘moderate’ harm rating to a ‘moderate’ contribution. On this basis the majority of the Site is not considered to lie within grey belt.

51530: Land at Beach Road, Cottenham, Cambridgeshire

Issue (Site Submissions Update)

2.100 The covering letter (Lanpro, March 2025) states that “*as the Greater Cambridge Green Belt Assessment concludes that the parcels do not ‘strongly contribute’ towards the purposes, the Site could be defined as ‘grey belt’ and therefore should be delivered as sustainable development in the region*”.

Response

2.101 The site lies within two parcels of the GCGBA: CH1 to the north and CH2 to the south, both of which have a ‘moderate-high’ harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘moderate-high’ harm rating equates to a ‘moderate’ contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

52643: Land north of Barton Road and Land at Grange Farm, Cambridge

Issue (Draft Local Plan consultation)

2.102 A Green Belt assessment prepared by The Landscape Partnership (TLP) on behalf of the Site promoter assesses those parcels on which built development is proposed (HC8, NH10, NH12 and OA11). It provides commentary on the GCGBA text and ratings, and alternative ratings which it

states are based on application of the guidance at GCGBA Figure 10, benchmark examples in Table 3.6 and professional judgement.

Response

2.103 The Green Belt assessment typically suggests contribution ratings either the same as those in the GCGBA or, more commonly, one notch lower on the contribution rating scale. For overall harm of release, it suggests ratings of 'high to moderate-high' for parcels HC8 and NH12, and 'moderate to moderate-high' for parcels NH12 and OA11.

2.104 In each of the four parcels assessed, it identifies a 'relatively strong' contribution (to Cambridge Purpose 1) as the highest contribution rating and concurs with the GCGBA's rating of minor-moderate for the impact of development on adjacent Green Belt land. The benchmark examples in Table 3.6 include one for the combination of a 'relatively strong' contribution to one purpose and minor-moderate for the impact of development on adjacent Green Belt land; the stated harm rating for this combination is 'high'.

2.105 The GCGBA's ratings for harm of release were 'very high' for each of the four parcels. Principle points of difference in TLP's assessment relate to role in maintaining the quality of Cambridge's setting (Cambridge Purpose 2) and the extent to which the Laundry Farm complex detracts from the role of land in preserving Cambridge's compact character (Cambridge Purpose 1). LUC stands by its judgements: Laundry Farm is not considered to represent a significant urbanising influence detracting from the Green Belt function of the rest of the Site and for the reasons stated in the GCGBA contribution to Purpose 2 is considered 'relatively significant' for all the parcels in question.

2.106 Additionally, with regard to parcel OA11, it should be noted that its rating of 'limited/no' contribution to Cambridge Purpose 1 was based on the assumption that development this distance from Cambridge would not be directly serving to limit expansion of the city. However, in the context of the proposed South West Cambridge development which would extend out from the

edge of the city, OA11 clearly would be performing a role in limiting the spread of the urban area. As Cambridge expands, the location of land contributing to Cambridge Purpose 1 moves outwards likewise. In this context, OA11's contribution to Purpose 1 should be considered 'significant'.

Issue (Draft Local Plan consultation)

2.107 The assessment also assesses the Site as a whole against NPPF purposes A, B and D in order to determine whether it should be considered grey belt. The conclusion is that it doesn't make a 'strong' contribution to any of the purposes, and so should be identified as grey belt.

Response

2.108 For the reasons set out in the GCGBA Review, all three Cambridge Purposes are considered to be aspects of NPPF Purpose D, although they have similarities with other NPPF purposes. The GCGBA Review equates to a 'very high' or 'high' GCGBA rating for harm from Green Belt release to a 'strong' contribution to Purpose D, a 'moderate-high' or 'moderate' harm rating to a 'moderate' contribution to Purpose D, and a 'low' harm rating to a 'weak/no' contribution to NPPF Purpose D. As the GCGBA rated HC8, NH10, NH12 and OA11 'very high' for harm, none of the Site is considered to be grey belt.

2.109 On the basis for equating GCGBA harm ratings to Purpose D contribution ratings, as described above, TLP's proposed alternative ratings of 'high to moderate-high' for parcels HC8 and NH12 would also not be low enough for these areas to be identified as grey belt. Application of the benchmark examples given in GCGBA Table 3.6 to TLP's alternative ratings for contribution and impact on adjacent Green Belt, which would have given 'high' harm ratings, would result in none of the Site being grey belt.

52726: Wren Park

Issue (Site Submissions Update)

2.110 The supporting letter does not present any green belt or grey belt analysis, other than to state *“The green belt line is arguably indefensible. There is no current boundary line on the ground that is identifiable”*.

Response

2.111 The site lies within the north-western part of parcel WH10 of the GCGBA, to the immediate south of Wren Park, which has a ‘high’ harm rating (map area 2). This is primarily a factor of its location between Whittlesford and Whittlesford Bridge and its contribution to preventing communities in the environs of Cambridge from merging into one another and with the city. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘high’ harm rating equates to a ‘strong’ contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

54906: Land at Rectory Farm, to the North-West of Milton

Issue (Site Submissions Update and Draft Local Plan consultation)

2.112 The Planning Statement (March 2025) argues that the introduction of a new busway route will affect the contribution the Site (within parcel MI1 of the

GCGBA) makes. It argues that the busway will shift the transport corridor further west, meaning that the A10 will no longer serve as an urban containment edge.

2.113 It provides an assessment against the NPPF Purposes, and concludes that the Site makes a “moderate, weak or no contribution” to Purpose A (“*the busway will provide a strong physical, linear and regular new feature in the landscape in ‘reasonable proximity that could restrict and contain development’ and which would mean there is no ‘incongruous pattern of development’*”), Purpose B (“*The site forms only a small part of a strategic gap and could be developed without the loss of visual separation due to the presence of the new busway and A10, limited natural landscape elements and low-lying topography that would all preserve visual separation*”) and Purpose D (“*The site is not within, adjacent to, or of any significant visual importance to historic Cambridge. By virtue of the A10 and future busway, it does not have any ‘visual, physical, or experiential connection to the historic aspects of the City’*”). The statement concludes that, based on this, along with no footnote 7 designation and that aspects of NPPF paragraph 155 would need to be met “*in decision making terms, the presumption would shift from ‘inappropriate development’ in green belt to a presumption in favour of sustainable development as per NPPF para 11 d(ii)*”.

2.114 There is also a Regulation 18 consultation response for this site, which reiterates the argument discussed above regarding the role of the forthcoming busway in containing new development. It goes on to suggest, without providing a detailed assessment, that there is a strong case for considering the Site to be grey belt as it doesn’t make a ‘strong’ contribution to NPPF purposes A, B or D.

Response

2.115 The site lies within parcels MI1 and LA6 of the GCGB, both of which have a ‘very high’ harm rating. The key issue here is the breaching of the strong and consistent boundary to the urban area formed by the A10 and associated tree cover, increasing the extent to which development would be viewed as sprawl associated with and reducing the compactness of Cambridge.

2.116 The presence of an alternative outer boundary feature, in the form of the proposed busway, does not significantly lessen the impact of breaching the existing strong boundary feature that currently contains the urban area. The A10 gives the Site a strong sense of separation from the urban area, and its consistency as an urban edge increases the extent to which development would be incongruous with the current urban form. It is also noted that the proposed development consists of two phases, of which the second (western) phase is located beyond the alignment of the busway (as proposed in the autumn of 2025), where the contention that the busway will provide containment of the developed area is not applicable.

2.117 The representation also considers the proposed busway to be an urbanising influence that will weaken the rural character of the area, and a visual barrier that will reduce the impact of development on the separation of Milton from other settlements. The ‘very high’ harm identified in the GCGBA was associated principally with loss of contribution to Cambridge Purpose 1, where the negation of the A10 boundary was identified as the key issue, but we also disagree that the busway would have these other suggested impacts. With regard to rural character, transport links are not considered by LUC to be specifically urban landscape elements, so whilst landscape character may be affected to some degree the area will not become more urban. With regard to settlement gaps, visual screening alone is not the key factor in settlement separation - if the physical gap between settlements is significantly reduced then the extent of openness between the settlements is reduced – and Phase 2 of the proposed development would negate the screening role of the busway.

2.118 Regardless of the above, the Cambridge to Waterbeach Busway will be subject to a Transport and Works Act application, and so it is not appropriate to amend the GCGBA assessments to reflect its impact at the current time.

2.119 As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘very high’ harm rating equates to a ‘strong’ contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

59397: Land West of Duxford Road, Whittlesford, South Cambridge

Issue (Site Submissions Update)

2.120 The supporting letter (KLW, March 2025), states that “*preliminary landscape and visual impact assessments confirm that the Site(s) has weak-to-moderate functionality in performing Green Belt purposes*” and argues that “*in view of this the Site is considered to have the capacity to accommodate residential development, subject to a sensitive landscape-led design approach to mitigate harm*”. No detail is provided in the letter to support this, but it does refer to ‘a full and detailed landscape, visual and green belt study’ that has helped inform the concept plan and that will be submitted in the coming months.

Response

2.121 The site lies within the central part of parcel WH10 of the GCGBA, to the immediate west of Duxford Road. The parcel has a ‘very high’ harm rating (map area 1), with land to the north-west having a ‘high’ harm rating (map area 2). This is primarily a factor of its location between Whittlesford and Whittlesford Bridge and its contribution to preventing communities in the environs of Cambridge from merging into one another and with the city. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘very high’ and ‘High’ harm ratings equate to a ‘strong’ contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

Issue (Draft Local Plan consultation)

2.122 A Green Belt assessment carried out on behalf of the Site promoter by FINC Architects assesses the Site's contribution to NPPF Purposes A to D. It is considered to make a 'moderate' contribution to Purpose C but no contribution to the other purposes, and so is identified as grey belt (for the identification of which, in accordance with the NPPF and PPG, only purposes A, B and D are relevant).

Response

2.123 As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D. The FINC assessment considers the Site to make no contribution to Purpose D because it "has no physical, visual or experiential relationship with the historic aspects of a town", but the Cambridge Green Belt Purposes address different aspects of contribution to the city's setting and special character. Therefore, whilst we agree that there is no visual relationship with Cambridge, the separation of villages around the city and the rural character of the intervening Green Belt are relevant considerations.

2.124 The GBGBA Review has determined grey belt status on the basis that a 'high' or 'very high' harm rating equates to a 'strong' contribution to NPPF Purpose D, which would mean that a parcel is not grey belt. The representor's site encompasses three parcels: WH10, WH12 and WH13. WH13 was rated 'moderate' for harm, which means that it is provisionally considered to be grey belt. WH12 was rate 'high' for harm but, as stated in the GCGBA Review, this rating was erroneous and should have been 'moderate-high'. This parcel is also, therefore, provisionally identified as grey belt.

2.125 WH10, which encompasses most of the Site, was rated in part 'high' and in part 'very high', which means that it has not been identified as grey belt. The key consideration here is impact on the separation of Whittlesford and Whittlesford Bridge (Cambridge Purpose 3): the retention of settlement gaps and retention of rural character in those gaps is an important aspect of

Cambridge's setting and special character and development of this site would entirely remove the gap between the settlements.

59410: The Boundary, High Street, Horningsea, Cambridge

Issue (Site Submissions Update)

2.126 The site Submission Update (February 2025) states that the Site “*meets the definition of ‘Grey belt’ on NPPF page 73 in so far as it does not strongly contribute to any of the purposes (a), (b), or (d) in paragraph 143 and is not excluded by footnote 7 relating to areas and assets that would provide a strong reason for refusing or restricting development*”.

Response

2.127 LUC's response to representations on this site (GCGBA – Response to Comments, 2025) addresses the points made in the representation. This justifies the ‘moderate’ harm rating assigned for parcel H05 in the GCGBA. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘moderate’ harm rating equates to a ‘moderate’ contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

200759: Land at Girton Road, Girton

Issue (Site Submissions Update)

2.128 The supporting letter (Bidwells, March 2025) states that *“the Site does not ‘strongly’ contribute to purposes (a), (b) or (d) in paragraph 143”*. It then goes on to provide an initial review against the Cambridge Purposes with relationship to the NPPF Purposes indicated. However, this doesn’t provide any indicative ratings or detailed analysis to support the claim that it is grey belt.

Response

2.129 The site comprises the western part of parcel G118, which has a ‘very high’ harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘very high’ harm rating equates to a ‘strong’ contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

Issue (Site Submissions Update)

2.130 The supporting letter also makes the point that *“the Site is considerably smaller than the size of the overall parcel assessed in the Greater Cambridge Green Belt Assessment 2021”* and that *“a site-specific assessment would therefore be required to more accurately assess the Site on the purposes of the Green Belt and the level of harm should it be released from the Green Belt”*.

Response

2.131 LUC’s response to representations on this site (GCGBA – Response to Comments, 2025) addressed the point on the size of the Site in relation to the

parcel. 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)

2.132 In regard to Purpose 1 *“The assessment already concludes that the release would not alter the openness of the Green Belt due to the existing tree belts surrounding the GI18 parcel. There are opportunities to enhance this tree belt as part of the development, providing appropriate screening from all viewpoints, which will help mitigate any perceived impacts over Cambridge Purpose 1, which seeks to preserve the unique character of Cambridge”.*

Response

2.133 The overall harm rating also considers loss of openness within the parcel, not just the impact on adjacent land as suggested. An important consideration here is that development in the Site would extend into land with strong distinction (owing largely to the falling topography) which would be perceived as diminishing Cambridge’s compact character. In regard to mitigation options for the Site, the GCGBA was a comprehensive assessment of potential harm of Green Belt release across all of Greater Cambridge, rather than an assessment of specific development proposals. Judging the impact of mitigation measures 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 GCGBA 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 (Site Submissions Update)

2.134 “In relation to Cambridge Purpose 3, while the release of this parcel of land, would push the development boundary further to the east, there is sufficient separation from any neighbouring settlement to avoid a risk of Girton merging with other communities” and “*To the south of the A14 road, the allocated and consented Darwin Green Development, ensures that separation will be maintained in perpetuity through the location of the Country Park just south of A14...*”.

Response

2.135 LUC’s response to representations on this site (GCGBA – Response to Comments, 2025) addresses this point in part. In regard to the Darwin Green proposals, this would relate more to the gap between Girton and Cambridge to the south rather than between Girton and Histon/Impington.

Issue (Draft Local Plan consultation)

2.136 A Green Belt assessment prepared by Bidwells on behalf of the Site promoter suggests that it should be identified as grey belt because it makes only a ‘moderate’ contribution to NPPF Purposes A and B (which it equates to Cambridge Purposes 1 and 3 respectively) and a ‘weak’ contribution to NPPF Purpose D (which it equates to Cambridge Purpose 2). With regard to Purpose A, the Bidwells assessment suggests that the Site’s size and proximity to Girton rather than Cambridge limit the extent to which development would be sprawl of the city, and that development design will limit the extent to which the resulting urban pattern can be considered incongruous. It also suggests that the GCGBA’s ‘relatively significant’ rating for contribution to Cambridge Purpose 1 does not equate to a ‘strong’ contribution to NPPF Purpose A.

Response

2.137 The GCGBA Review clarifies that contribution to NPPF Purposes A and B has not been assessed, as all of the Cambridge Green Belt Purposes are aspects of NPPF Purpose D, but the similarity to Cambridge Purpose 1 and 3 is acknowledged.

2.138 The Cambridge Purpose contribution ratings cannot be directly equated to the NPPF purpose rating scale used in the February 2025 PPG's illustrative criteria for grey belt assessment. This is because, as is explained in the GCGBA Review, the GCGBA ratings for impact of development on adjacent Green Belt also form part of the assessment of contribution as described in the PPG. Also the fact that 'relatively significant' is not the highest rating on a 5-point scale is not in itself justification that it should not be equated to the highest rating on a 3-point scale.

2.139 The points regarding site size and development design have been addressed in the above responses to Site Submissions Update representations. The GCGBA Review clarifies that contribution to NPPF Purpose A has not been assessed but its similarity to Cambridge Purpose 1 is acknowledged. The extent to which Girton is linked to Cambridge combined with its lack of significant physical features to provide containment in our view justifies the rating given.

2.140 The Bidwells Study states that for NPPF Purpose B / Cambridge Purpose 3, the GCGBA's 'strong' contribution rating is an overstatement in relation to the size of the development site (relative to the size of the gap between Girton and Histon/Impington). In LUC's view, the general visual openness of the gap and lack of containing features are significant factors which justify the contribution rating. However, it should also be noted that consideration of the impact of development on the gap was, in the GCGBA, considered as part of the 'impact on adjacent Green Belt' rating, not as part of the contribution rating. So the GCGBA contribution rating is only part of the picture, which makes it different to the PPG's illustrative criteria for contribution to NPPF Purpose B (aside from the fact that Purpose B is not applicable to land around Cambridge, as it only relates to gaps between neighbouring towns). If it had been judged that the

development of the parcel would have a fundamental impact on the settlement gap, we would have assigned a higher than minor-moderate rating for impact on adjacent Green Belt.

Issue (Draft Local Plan consultation)

2.141 With regard to the GCGBA's minor-moderate rating for impact of development on adjacent Green Belt land, it is suggested that an appropriate planting strategy will reduce impact.

Response

2.142 As previously noted, the GCGBA assumed retention of current boundaries and did not consider potential mitigation through landscaping or other design measures.

200768: Land off the High Street, Hauxton, Cambridgeshire

Issue (Site Submissions Update)

2.143 The covering letter (Savills, March 2025) refers to the updated NPPF and the concept of grey belt. It argues that *“the Site is considered to be a logical extension to Hauxton for residential allocation as grey belt/ green belt release”*. To support this it provides a high-level appraisal against the NPPF Purposes, concluding that the Site does not strongly contribute to Purpose A or B (*“as Villages should not be considered large built up areas”*), or D (*“It is found to have a relatively limited contribution to Cambridge’s setting as viewed in the approach to Cambridge from the railway line”* for Cambridge Purpose 2 in the GCGBA).

Response

2.144 The site covers parcel HX7 and the northern half of parcel HX6 of the GCGBA. These parcels have a 'moderate' and 'very high' harm rating respectively (the former was erroneously stated as 'high' in the GCGBA but corrected in the GCGBA Review). The key issue here is the contribution to preventing communities in the environs of Cambridge from merging with one another (Cambridge Purpose 3), with development causing a physical reduction of the settlement gap between Hauxton and Little Shelford, despite the M11 remaining as a separating feature. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'very high' and 'high' harm ratings equate to a 'strong' contribution to NPPF Purpose D. On this basis the eastern part of the Site is not considered to lie within grey belt but the western part, in HX7, is provisionally identified as grey belt.

Issue (Site Submissions Update)

2.145 In relation to NPPF Purpose B the representation argues that *“should the Site come forward for residential development, there would still be physical and visual separation between Hauxton and neighbouring settlement of Little Shelford”* and that *“Through development at the Site there would be opportunity for further enhancement planting, acting as green separation, along the eastern and southern boundaries of the Site, thereby enhancing the settlement boundary at Hauxton to ensure no feeling of coalescence with neighbouring Little Shelford”*. It adds that *“as you travel east from Hauxton towards Little Shelford, the M11 bridge over High Street, to the east of the Site, acts as a transition point leaving Hauxton”* and that *“Further to the east beyond the M11, there is again green separation before reaching the built form of Little Shelford”*.

Response

2.146 Notwithstanding the fact that NPPF Purpose B does not apply to villages (which Hauxton and Little Shelford clearly are), we have noted in the preceding

response that development within the eastern part of the Site would cause a physical reduction of the settlement gap between Hauxton and Little Shelford, despite the M11 remaining as a separating feature. This would leave only a very narrow area of Green Belt land east of the M11. We therefore stand by our 'very high' harm rating for parcel HX6.

2.147 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]". However, whilst development may offer the opportunity to introduce landscaped boundaries, considering the physical loss of open Green Belt land there would be a limit to the degree of mitigation that this could offer.

200770: Land to east of Horningsea Road & west of Ditton Lane, Fen Ditton

Issue (Site Submissions Update)

2.148 No Green Belt or grey belt related analysis is provided within the Supporting Letter (Vistry Group, March 2024). However, Supporting Statement suggests that *"the Site is visually well contained from the wider landscape and Green Belt, with the A14 forming a visual detractor in the Green Belt"*.

Response

2.149 The site (as shown on drawing number TOR-RL-001) falls across four parcels from the GCGBA: FD3, FD4, FD5 and FD6. The majority of the Site lies within FD4 and FD5 which both have a 'very high' harm rating. The southern parts of the Site are within FD3 and FD6 which are located along the edge of Fen Ditton and have lower overall harm ratings – 'moderate-high' and 'high' respectively. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'very high' and 'high' harm ratings equate to a 'strong' contribution to NPPF Purpose D. On this basis the majority of the Site is not considered to lie within grey belt.

Issue (Draft Local Plan consultation)

2.150 The representations document (Turley, January 2026) is accompanied by a Preliminary Landscape and Visual Technical Note and Green Belt Review (SLR, January 2026). The Green Belt Review section provides a 'preliminary Green Belt appraisal' of the Site against the NPPF Purposes and the February 2025 PPG, rather than against the Cambridge Purposes.

2.151 The report argues that the Site makes a 'moderate to weak' contribution to Purpose A, stating that the settlement edge of Fen Ditton is on two sides and there are physical features (the A14 and future WWTW) which could restrict and contain development. The A14 is argued to present "*a logical boundary for future expansion of Cambridge*".

2.152 The appraisal argues that the Site makes no contribution to Purpose B, as the Site "*does not form part of the gap between two Towns*".

2.153 The appraisal states that the Site makes a 'moderate' contribution to Purpose D, stating that the Site "*does not abut the historic City Centre*" and "*does not have an important visual, physical or experiential relationship to the historic aspects of the town*".

2.154 The Green Belt appraisal concludes that the Site “*could potentially be classified (from a landscape and visual perspective) as grey belt*”.

Response

2.155 The GCGBA Review clarifies that contribution to NPPF Purposes A and B has not been assessed, but the similarity to Cambridge Purpose 1 and 3 is acknowledged.

2.156 We would agree that the Site makes a ‘limited’ contribution to Purpose B. However, with regard to Cambridge Purpose 1 (which the representation treats as NPPF Purpose A), whilst the A14 forms a relatively strong boundary feature, development within the Site would extend a considerable distance from the edge of Fen Ditton into land with a strong distinction/sense of separation from the urban edge. Development here would be perceived as sprawl which would cause an incongruous pattern of development and, in so doing, harm Cambridge’s setting and special character.

2.157 With regard to aspects of Cambridge’s setting and special character that the representation considers under NPPF Purpose D, the land within the Site, whilst not directly abutting the city, does contribute to the rural landscape setting experienced when approaching the wider city from the east.

2.158 As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D; the ‘very high’ and ‘high’ harm ratings equate to a ‘strong’ contribution to NPPF Purpose D and the ‘moderate-high’ rating to a ‘moderate’ contribution. The site lies across five parcels defined in the GCGBA (2021): FD3, FD4, FD5, FD6 and BW1. All of these have either a ‘high’ or ‘very high’ harm rating, with the exception of FD3 located along the edge of Fen Ditton which has a ‘moderate-high’ harm rating. On this basis the majority of the Site is not considered to lie within grey belt.

200772: Barn 3, Park Farm, Villa Road, Impington

Issue (Site Submissions Update)

2.159 The supporting letter (CERES Properties) references the changes to the NPPF in December 2024, in regard to the definition of grey belt. It goes on to reference the PPG and states that this *“confirms that Purpose A, checking the unrestricted sprawl of large built up areas, does not (emphasis added) apply to villages”*. No clear argument is made that site is ‘grey belt’ but the implication is that as Impington is a village then the NPPF Purpose A is not relevant to the Site. The letter also states that *“importantly, this site has an established development planning permission, is previously developed land and as such, should be considered grey belt”*. However, no detail is provided to support the argument that the Site comprises grey belt.

Response

2.160 The site (as shown on the Site location plan 00-100) lies predominantly within parcels HI22 and HI23 of the GCGBA, with a proposed access road to the south-east within parcel HI21. HI22 has a ‘high’ harm rating and HI23 a ‘very high’ harm rating, whilst HI21 has a ‘moderate-high’ harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘very high’ and ‘high’ harm ratings equate to a ‘strong’ contribution to NPPF Purpose D. On this basis the majority of the Site is not considered to lie within grey belt.

2.161 The GCGBA did not make judgements on whether land can be considered previously developed (PDL), and did not consider past planning history, only committed developments and site allocations.

200783: Duxford Hub – Land to the north of A505, Duxford

Issue (Site Submissions Update)

2.162 No green belt or grey belt related analysis is provided within the supporting letter (Lanpro, March 2025) or vision document.

Response

2.163 The site (as shown on the location plan) falls across several parcels from the GCGBA: HE1, HE2, HE3, HE4, HE5, HE6, TH3, TH4, TH5, TH9, WH10, WH14 and WH15. The majority of these parcels have a 'very high' or 'high' harm rating, with some parcels closer to the edges of Duxford Camp and Thriplow having 'moderate' (HE3) or 'moderate-high' harm ratings (HE2). As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'very high' and 'high' harm ratings equate to a 'strong' contribution to NPPF Purpose D. On this basis the majority of the Site is not considered to lie within grey belt.

200829: Land east of Bridge Road, Histon

Issue (Site Submissions Update)

2.164 It is suggested that the Site makes a 'limited' contribution to NPPF Green Belt purposes A, B and D because i) there is 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, and that the Site should, therefore, provisionally be considered grey belt.

Response

2.165 No arguments are presented specific to grey belt. LUC's response to representations on this site (GCGBA – Response to Comments, 2025) addresses the points made in the representation. This justifies the 'very high' harm rating assigned in the GCGBA. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the 'very high' harm rating equates to a 'strong' contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

Issue (Draft Local Plan consultation)

2.166 The representation letter (Savills, January 2026) is supported by a Landscape Summary Report (Golby + Luck Landscape Architects, January 2026) which includes a section on 'Green Belt Issues'. The report sets out a high-level appraisal of the Site against National Green Belt Purpose A, B and D.

2.167 In regard to Purpose A the report states that *“the Site is near to the large built-up area, is the subject of other urbanising influences, it is partially enclosed by existing development and would not result in an incongruous pattern of development and has immediate boundary features that could restrict and contain development”* and that it *“makes a medium to weak contribution to this purpose”*.

2.168 In regard to Purpose B the report states that *“the contribution to this purposes can only be considered moderate given the Site is located in a gap*

that includes structures (the A14) that limit the perceived loss of visual separation, and features (Cawcutts Lake) that maintain a permanent open setting (gap) between Histon and Cambridge” and that “the Site makes a medium contribution to this purpose”.

2.169 For Purpose D the report states that, whilst the Site is located at the edge of Cambridge, it does not make a significant contribution to special character of Cambridge. It argues that, due to the raised A14, *“the Site has no physical or visual relationship with the historic aspects of Cambridge, and therefore makes a weak contribution to this purpose”.*

Response

2.170 The GCGBA Review clarifies that contribution to NPPF Purposes A and B has not been assessed, but the similarity to Cambridges Purpose 1 and 3 is acknowledged. We would not agree that the Site would make only a ‘moderate’ contribution to Cambridge Purposes 1 and 3. Development of the Site would further reduce the sense of separation between the large built up area of Cambridge and the village of Impington which would cause an incongruous pattern of development with Impington and Histon becoming increasingly perceived as an extended ‘finger’ of development into the Green Belt.

2.171 As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D. The site is located within parcel HI15 which was assessed as having a ‘very high’ harm rating, which equate to a ‘strong’ contribution to NPPF Purpose D. On this basis, the majority of the Site is not considered to lie within grey belt.

Issue (Draft Local Plan consultation)

2.172 In regard to the Cambridge Green Belt Purposes, the report argues that *“given the relatively small scale of the Site when considered against the wider setting of Cambridge and its surround Green Belt it is highly unlikely the release*

of the Site for development will compromise the purposes ... when considered as a whole” and that it “does not perform a strong Green Belt purpose, and given its contained setting defined by robust and ensuring boundaries, its release will not comprise the ongoing strength and function of the wider purposes of the Green Belt”. The report then argues that “the existing Cambridge Green Belt purposes ... must now be considered out of date, and will need to be revised and reassessed as part of the evidence base to an emerging plan”.

2.173 The report also sets out a response to the previous LUC response (GCGBA – Response to Comments, 2025), arguing that *“land associated with the hotel and Cawcutts Lake maintain an open setting between the Site and Cambridge and are capable of maintaining the physical and perceived separation between Histon and Cambridge”* and that *“the A14 and associated development within Cambridge to the south provide a clear transition between the main urban area and wider setting of villages and settled farmland beyond...”*. It then argues that *“whilst the development of the Site will result in some increase in the urbanising influence of the Site, there is no reason why this urbanising effect cannot be secured in a way that reinforces the looser pattern and smaller scale of development associated with Histon, to further drawn distinction with the larger denser setting of Cambridge”* and that *“this in turn will help to reinforce the separate character and identities of the settlements”*.

Response

2.174 As set out in the GCGBA, development within parcel HI15 would further reduce the narrow gap between Impington and Cambridge, to the detriment of preventing communities in the environs of Cambridge merging (Cambridge Purpose 3) and on preserving the compact nature of Cambridge (Cambridge Purpose 1). We would not agree with the assertion that development within the Site would help to ‘reinforce the separate character and identities of the settlements’. Parcel HI15 was assessed in the GCGBA as having a ‘very high’ harm rating, which equates to a ‘strong’ contribution to NPPF Purpose D.

2.175 In regard to the Cambridge Purposes being ‘considered out of date’, the GCGBA Review explains their continued relevance. The December 2024 NPPF updates did not result in any change to the National Green Belt purposes, so there is no reason to question the use of the Cambridge Green Belt purposes as a local application of NPPF Purpose D.

200844: Part of Fulbourn Hospital Site

Issue (Site Submissions Update)

2.176 The supporting letter (Savills, May 2025) argues that, based on the NPPF, “*a) development of the Site would not result in unrestricted sprawl of large built-up areas; b) it would not result in neighbouring towns merging into one another; c) careful consideration to the quantum of development and layout could help safeguard the countryside from encroachment; and d) it would not harm the setting and special character of historic towns*”.

Response

2.177 The site lies within parcel CH15 of the GCGBA, which has a ‘moderate-high’ harm rating. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D and the ‘moderate high’ harm rating equates to a ‘moderate’ contribution to NPPF Purpose D. On this basis the Site is provisionally considered to lie within grey belt.

208861: Bury Farm, Stapleford

Issue (Draft Local Plan consultation)

2.178 The representations letter (Bidwells, January 2026) sets out that the GCGBA does not take account of the NPPF reforms in 2024 (incorporating the concept of grey belt) or the forthcoming Cambridge South East Transport (CSET). The letter provides a high-level assessment against National Green Belt Purposes A, B and D, arguing that the Site makes a 'limited' contribution to Purpose A, No contribution to Purpose B, and No contribution to Purpose D. In regard to Purpose A the letter argues that the CSET, once delivered, would *"provide a clear defined boundary and introduce an urbanised context to the Site"*.

Response

2.179 A Transport and Works Act Order application was submitted for CSET Phase 2 in 2025 and will be subject to a forthcoming public inquiry. This is not currently consented development, and is therefore not considered to change the findings of the GCGBA.

2.180 The GCGBA Review takes account of the December 2024 NPPF and February 2025 PPG. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D; the 'very high' and 'high' harm ratings equate to a 'strong' contribution to NPPF Purpose D and the 'moderate-high' rating to a 'moderate' contribution. The site lies across GCGBA parcels GS11 and GS12 and a small part of GS13, with GS11 having a 'high' harm rating, GS12 a 'very high' harm rating and GS13 a 'moderate-high' harm rating. On this basis the majority of the Site is not considered to lie within grey belt.

OS214 (200967): Cambridge South

Issue (Draft Local Plan consultation)

2.181 The submission (Quod, March 2025) is supported by a Green Belt Appraisal (David Jarvis Associates, January 2026). This appraises the Site against National Green Belt Purposes A, B and D, arguing that it makes a ‘moderate’ contribution to Purpose A, No contribution to Purpose B and a ‘moderate’ contribution to Purpose D. It goes on to state that, other than two Scheduled Monuments, the Site is not subject to any footnote 7 designations and that “on this basis the Site is considered to be grey belt”.

2.182 In regard to Purpose A the appraisal argues that the Site is “*very clearly defined by strong, permanent physical features in reasonable proximity that that could restrict and contain development in the form of the M11 to the west, River Cam to the south and the urban form of Great Shelford to the north and east*” and that its development “*would not result in an ‘incongruous finger of development’ as a continuous ribbon of development already exists, linking Trumpington and Great Shelford along both sides of Shelford Road*”.

2.183 In regard to Purpose B and D it argues that Cambridge is the only town identified and all other settlements are villages.

Response

2.184 The GCGBA Review clarifies that contribution to NPPF Purposes A and B has not been assessed, as all of the Cambridge Green Belt Purposes are aspects of NPPF Purpose D, but the similarity to Cambridges Purpose 1 and 3 is acknowledged. We would not agree that the Site would make only a ‘moderate’ contribution to Cambridge Purposes 1 and 3. With regard to Cambridge Purpose 1, whilst the M11 and River Cam form relatively strong boundary features, development within the Site would extend a considerable

distance from the edge of Great Shelford into land with a strong distinction/sense of separation from the urban edge. With regard to Purpose 3, development would cement the link between Cambridge and Great Shelford, increasing the extent to which the latter would be perceived as sprawl of the former.

2.185 In regard to Cambridge Purpose 2, which the representor's assessment equates to Purpose D, the land within the Site contributes to the rural landscape setting experienced when approaching the wider city from the south-west; it also forms the immediate setting of a Scheduled Monument and therefore makes some positive contribution to the character of the landscape and the quality of Cambridge's setting.

2.186 As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D; the 'very high' and 'high' harm ratings equate to a 'strong' contribution to NPPF Purpose D and the 'low' harm rating equates to a 'weak/no' contribution. The site lies across parcel GS24, GS25, TR5 and a small part of LS11 of the GCGBA, with GS24 and TR5 having a 'very high' harm rating, TR4 a 'high' harm rating and GS25 a 'low' harm rating. On this basis, the majority of the Site is not considered to lie within grey belt.

OS215: Cambridge South

Issue (Site Submissions Update)

2.187 The call for sites submission (Quod, March 2025) sets out a high-level assessment of whether the Site contributes strongly to NPPF Purposes A, B or D. It argues that the Site does not strongly contribute to any of the three purposes and therefore could be considered grey belt. The assessment states that the Site "*does not make a 'considerable contribution to the special character' of Cambridge*" as "*It is not considered to be within, adjacent to or of significant visual importance to the historic aspects of the town*" and therefore does not strongly contribute to Purpose D.

Response

2.188 The GCGBA Review clarifies that contribution to NPPF Purposes A and B has not been assessed, but the similarity to Cambridges Purpose 1 and 3 is acknowledged. As set out in the GCGBA Review, all three Cambridge purposes form elements of NPPF Purpose D.

2.189 The site lies across three parcels from the GCGBA: TR5 to the north; GS24 centrally; and LS11 to the south. All three of these parcels have a 'very high' harm rating, owing primarily to helping preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre (Cambridge Purpose 1); and in helping to prevent communities in the environs of Cambridge from merging into one another and with the city (Cambridge Purpose 3). The 'very high' harm rating equates to a 'strong' contribution to NPPF Purpose D. On this basis the Site is not considered to lie within grey belt.

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- 1 Greater Cambridge Green Belt Assessment: Review following changes to National Policy and Guidance (LUC, June 2026)