

Grey Belt Assessment – Mill Lane, Sawston  
November 2025



**GREY BELT  
ASSESSMENT  
MILL LANE, SAWSTON**

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# Quality Assurance

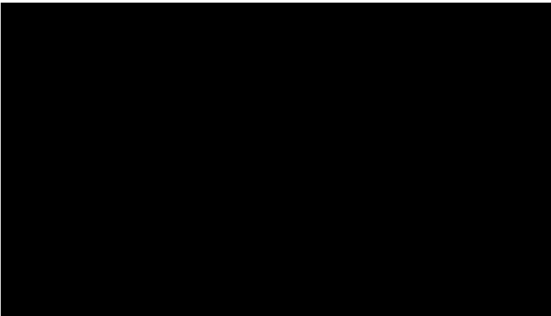
**Site name:** Land to the North of Mill Lane, Sawston  
**Client name:** Northwest Biotherapeutics Capital Limited  
**Type of report:** Grey Belt Assessment

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**Date** 19/11/2025

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**Date** 19/11/2025



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GREEN BELT ASSESSMENT - METHODOLOGY

# 1.0 Introduction

- 1.1 This Grey Belt Assessment has been prepared by Bidwells on behalf Northwest Biotherapeutics Capital Limited to consider whether the Land north of Mill Lane, Sawston ('the site') can be considered Grey Belt, as defined within the NPPF February 2025. This assessment will consider two matters in relation to the 'grey belt' provisions introduced in the new NPPF:
- Whether the site falls within the definition of grey belt set out in the glossary in the NPPF Annex 2; and
  - Whether the development can meet the test set out in the NPPF paragraph 155.

## The Site

- 1.2 The site is located within the administrative boundary of South Cambridgeshire District Council and lies within the designated Cambridge Green Belt.
- 1.3 The site is situated to the west of the village of Sawston south of Cambridge City. It covers approximately 6.83 hectares of agricultural land, which is divided into two fields by a dense tree belt.
- 1.4 The site is bounded:
- To the north by a neat hedgerow beyond which is rural land.
  - To the south by Mill Lane and the residential area around Winter Field Way and New Road.
  - To the east a tree belt and hedgerow beyond which are playing fields.
  - To the west by a hedgerow and tree belt that run along the A1301.
- 1.5 The existing vegetation creates a strong peripheral edge, albeit this is not consistent as it disappears along Mill Lane and is less dense along the residential area to the south.
- 1.6 Access to the two parcels within the Site is currently from the adjacent fields to the north. A major road infrastructure (A1303) and tree belts define the western and northern edges, reducing the Site's visual and functional continuity with the wider Green Belt.



Figure 1: The Site Location with wider aerial view



Figure 2: The Site Location with closer aerial view

## 2.0 Grey Belt Definition

2.1 In determining whether the site constitutes 'grey belt', there are several tests that would need to be met, as set out within NPPF December 2024 and clarified through the Green Belt Planning Practice Guidance ('PPG') published in February 2025.

2.2 The definition of grey belt, as set out in the Glossary (Annex 2) of the NPPF is:

*'Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development'.*

2.3 A detailed methodology for appraising whether the site is grey belt is set out in Appendix A.

2.4 The site does not constitute land within, or contain areas or assets listed in Footnote 7 (other than Green Belt) of the NPPF December 2024.

## 3.0 Green Belt Contribution

- 3.1 The definition of grey belt notes it to be any land within the Green Belt that ‘does not strongly contribute to any of purposes (a), (b), or (d)’. These purposes relate to:
- a) to check the unrestricted sprawl of large built-up areas;
  - b) to prevent neighbouring towns from merging into one another; and
  - d) to preserve the setting and special character of historic towns.
- 3.2 Paragraph 005 of the Green Belt PPG provides some guidance on how to assess the contribution of Green Belt land towards purposes (a), (b) and (d).

### Council’s Evidence Bases

- 3.3 As part of our research Bidwells has reviewed the *Greater Cambridge Green Belt Assessment (2021)* to help determine whether the site makes a strong contribution to Green Belt purposes (a), (b), and (d). This assessment has been supplemented by our professional judgement.
- 3.4 The Greater Cambridge Green Belt Review (LUC, 2021) evaluated the site as Parcels SA20 and SA21 (refer to Figure 3). This assessment was carried out prior to updates to the Green Belt Planning Practice Guidance (PPG).
- 3.5 The Review interprets the five purposes of the Green Belt set out in the National Planning Policy Framework (NPPF) and translates them into three specific purposes tailored to the Cambridge Green Belt. The relationship between the Cambridge-specific purposes and the NPPF purposes is as follows:

Table 1: Inter-relationship between Cambridge purpose and NPPF purposes

CAMBRIDGE PUPOSE	NPPF PURPOSE
1. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre,	a) To check the unrestricted sprawl of Large built-up areas.
2. Maintain and enhance the quality of its settings	c) To assist in the safeguarding of the countryside from encroachment, and d) To preserve the setting and special character of historic towns.
3. Prevent communities in the environs of Cambridge from merging into one another and with the city	b) To prevent neighbouring towns merging into one another.

3.6 **Therefore, to be considered “grey belt”, the site must not score significantly in all three purposes of the Cambridge Green Belt** (emphasis added).

3.7 The Review identifies the site’s contribution to the three Cambridge Green Belt purposes, as summarised in table 2 and figure 3 below.

Cambridge Purpose 1 - to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre:

- SA20 Contribution: Limited/No contribution - Land is not close enough to the main urban area of Cambridge to be associated with it; the land is closely associated with the settlement of Sawston. It therefore makes no contribution to Cambridge Purpose 1.
- SA21 Contribution: Limited/No contribution - Land is not close enough to the main urban area of Cambridge to be associated with it; the land is closely associated with the settlement of Sawston. It therefore makes no contribution to Cambridge Purpose 1.

Cambridge Purpose 2 - to maintain and enhance the quality of Cambridge’s setting:

- SA20 Contribution: Moderate - Land comprises open farmland that has a strong distinction from the edge of Sawston and therefore has a strong rural character. This contributes to a rural landscape setting experienced on approach to the city from the south along the A1301. Overall the parcel makes a moderate contribution to Cambridge Purpose 2.
- SA21 Contribution: Limited/No contribution - Land has a moderate distinction from the edge of Sawston, meaning it has some relationship with the inset area. However, it has a use (sports pitches) to the east that associates it with the inset area and weakens its rural character. It does not form or contain any features/aspects that contribute to the quality of Cambridge’s setting. Overall, the parcel makes a limited contribution to Cambridge Purpose 2.

Cambridge Purpose 3 - to prevent communities in the environs of Cambridge from merging into one another and with the city:

- SA20 Contribution: Relatively limited - Land is open and is peripheral to a moderate gap between Sawston and Whittlesford. Although the settlement gap is robust, there is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as narrowing the gap. Overall, the parcel makes a relatively limited contribution to Cambridge Purpose 3.
- SA21 Contribution: Moderate - Land is open and lies in a moderate gap between Sawston and Great Shelford, but there are some significant separating features including woodland belts and the River Granta. The parcel has some relationship with the inset area, but also a degree of distinction from it. Overall, the parcel makes a moderate contribution to Cambridge Purpose 3.

3.8 In light of the above assessments, the Council concluded that:

*‘Parcel SA20 makes a moderate contribution to maintaining and enhancing the quality of Cambridge’s setting, and a relatively limited contribution to preventing communities in the environs of Cambridge from merging with one another. The additional impact on the adjacent Green Belt of the release of the parcel would be minor. Therefore, the harm resulting from its release, as an expansion of Sawston, would be moderate’.*

*‘Parcel SA21 makes a moderate contribution to preventing communities in the environs of Cambridge from merging with one another, and a limited contribution to maintaining and enhancing the quality of Cambridge’s setting. The additional impact on the adjacent Green Belt of the release of the parcel would be negligible. Therefore, the harm resulting from its release, as an expansion of Sawston, would be low’.*

Table 2: Summary of the Council’s Assessment

REF	P1 CONTRIBUTION	P2 CONTRIBUTION	P3 CONTRIBUTION	HARM
SA20	Limited/ No Contribution	Moderate	Relatively Limited	Moderate
SA21	Limited/ No Contribution	Limited/ No Contribution	Moderate	Low

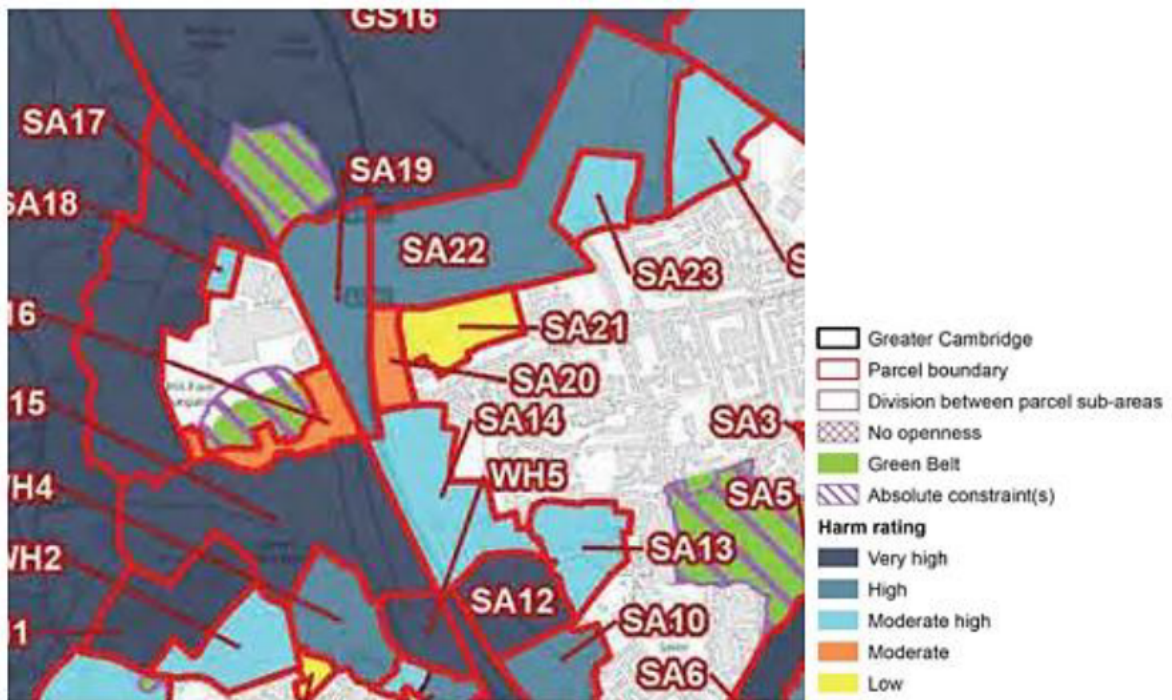


Figure 3: Site overall harm score if removed from Green Belt

3.9 In addition to reviewing the Council’s Green Belt Study, Bidwells has independently assessed the site’s contribution to Green Belt purposes based on the Council’s Green Belt Assessment. This assessment is summarised in the table 3 below.

Table 3: Bidwell’s Assessment of the Site

PURPOSE	COMMENTS	STRONGLY CONTRIBUTING?
<p><b>Cambridge Purpose 1</b> - to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre</p>	<p>The site is related both visually and physically to the existing built form of Sawston. The site is not associated with the urban area of Cambridge city. It does not form part of the historic core or the wider historic setting of Cambridge City.</p> <p>In our view, a high-quality development within a well-connected location like Sawston would support Cambridge’s dynamic growth and would not undermine the Green Belt purpose of preserving the unique character of Cambridge.</p> <p>We agree with the conclusions of the Council’s Green Belt Assessment which concludes that the site makes no contribution to Purpose 1.</p>	<p>Does not contribute</p>
<p><b>Cambridge Purpose 2</b> - to maintain and enhance the quality of Cambridge’s setting</p>	<p>The site is located south of Cambridge City in the village of Sawston, rather than a town. The site is not located within Sawston’s conservation area and site lies outside the area that makes a meaningful contribution to the historic setting of Cambridge city.</p> <p>We disagree with the conclusions of the Council’s Green Belt Assessment, which pre-dates recent clarifications in the Planning Practice Guidance (PPG). Accordingly, we disagree with the Council’s interpretation of the sites function of Green Belt under purpose 2 for SA20. In our view that whilst the land comprises open farmland at the edge of Sawston, the site is visually connected by adjacent developments including A1301 bypass, existing residential area, and community facilities which strengthens its connection to the village. Development of the site would therefore not appear as an incongruous form of development.</p> <p>We support the Council’s assessment for SA21 of this Green Belt purpose, which finds that the sites landscape role is limited and has a weakened</p>	<p>Does not contribute</p>

	<p>contribution to the openness and character of the Green Belt.</p> <p>Accordingly, the site does not perform a significant Green Belt role under Purpose 2.</p>	
<p><b>Cambridge Purpose 3 - to prevent communities in the environs of Cambridge from merging into one another and with the city</b></p>	<p>The site is situated adjacent the established built form of Sawston. The site lies in a moderate gap between Sawston and nearby settlements with significant separating features including woodland belts and the River Granta. As such, it does not compromise the strategic separation provided by the surrounding Green Belt land.</p> <p>The A1301 and established tree planting creates a high degree of enclosure, reducing the site’s openness. Importantly, the A1301 creates a clear physical and visual boundary separation between Sawston and neighbouring villages.</p> <p>We disagree with the conclusions of the Council’s Green Belt Assessment for SA21, which pre-dates recent clarifications in the Planning Practice Guidance (PPG). The site is located within a village rather than a town, adjacent to the existing built form. In our view, development of the site would not undermine the Green Belt purpose of preventing settlement coalescence and would preserve the distinct character of both Sawston and surrounding settlements.</p>	<p>Does not contribute</p>

3.10 These factors, combined with limited environmental and landscape designations, suggest the site exhibits clear “grey belt” characteristics in landscape terms.

3.11 As demonstrated above, the site does not contribute towards purposes (a) of the Green Belt and does not contribute strongly to purpose (b) and (d). Therefore, in the context of the Grey Belt definition, the site does not strongly contribute to any of purposes (a), (b), or (d). As a result, the site would meet the NPPF’s definition of Grey Belt.

## 4.0 Appropriate Development

- 4.1 NPPF paragraph 155 states that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where:
- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
  - b. *There is a demonstrable unmet need for the type of development proposed;*
  - c. *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
  - d. *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.’*

4.2 This note will consider each of the criteria above in turn.

**a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;**

4.3 The following paragraphs consider how the development would affect the performance of the wider Green Belt beyond the site boundary against the five purposes. Each purpose is considered in turn, then conclusions are drawn regarding the purposes considered together.

**Purpose a) to check the unrestricted sprawl of large built up areas**

4.4 The site relates well to the existing built form, representing a logical extension to Sawston. The site is physically well-contained, bounded by existing development and key infrastructure, notably the A1301, Mill Lane and existing residential development that forms a physical and visual boundary that restricts growth. The existing trees provide natural screening and ensure the development remains contained. Together these features reduce the site’s openness and strategic function.

4.5 Consequently, the proposal would not conflict with the Green Belt’s objective to check the unrestricted sprawl of large built-up areas.

**4.6 Purpose b) to prevent neighbouring towns merging into one another**

4.7 Under the National Planning Policy Framework (NPPF), Purpose (b) seeks to prevent neighbouring towns for merging into one another. Importantly, Paragraph 005 of the Green Belt PPG specifically states ‘this purpose relates to the merging of towns, not villages’. In this context, it is important to note that Sawston is not classified as a town but a village. Within the South Cambridgeshire Local Plan (2018), Sawston is identified in the settlement hierarchy as a Rural Centre.

4.8 Sawston’s form, scale and setting are consistent with that of a village, not an urban settlement. It retains a defined village character and clear sense of separation from Cambridge, reinforced by physical and visual barriers such as the A1301 bypass, surrounding green infrastructure and open land. The settlement’s modest size and predominately residential character further distinguish it from large urban centres.

- 4.9 Given this context, NPPF Purpose (b) which specifically relates to preventing the coalescence of neighbouring towns is not directly applicable to this site. The relationship between Sawston and Cambridge is that of a village and a city, rather than comparable urban settlements.
- 4.10 Accordingly, the site makes a limited contribution to Purpose (b) of the Green Belt, and its release for appropriate, well-integrated development would not conflict with the Green Belt purpose.
- 4.11 **Purpose c) to assist in safeguarding the countryside from encroachment**
- 4.12 Sawston village's edge is not distinct from the Site. It is closely associated with the existing residential and developed areas and is visually constrained by strong physical boundaries, including the A1301 and established tee line and built form to the south and east. As such, it does not form part of the wider open countryside but represents land that is already influenced by village characteristics and infrastructure.
- 4.13 Its development would not undermine the overall aim of safeguarding the countryside from encroachment and offers an opportunity to deliver a well-contained development consistent with the existing built form. Consequently, the proposal would not undermine the purpose of the Green Belt in preventing neighbouring settlements from merging into one another
- 4.14 **Purposes d) to preserve the setting and character of historic towns**
- 4.15 Cambridge is recognised as a historic city, and the Green Belt plays a key role in protecting its distinctive character and setting. However, the subject site lies outside the area that makes a meaningful contribution to the historic setting of the city. The site is physically and visually separated from the historic core by neighbouring villages and open land, which provides a clear separation.
- 4.16 The site's contribution to Purpose (d) of the Green Belt is limited as development would not harm the historical setting and character of Cambridge.
- 4.17 **Purpose e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land**
- 4.18 Whilst the site is not previously developed land, development of the Site would not fundamentally undermine the functions of the Green Belt taken together across the Plan as a whole.
- 4.19 **b. There is a demonstrable unmet need for the type of development proposed;**
- 4.20 Footnote 56 clarifies that in the case of applications involving the provision of housing, demonstrable unmet need means the lack of a five-year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Test was below 75% of the housing requirement over the previous three years.
- 4.21 In December 2024, the revised NPPF introduced a new Standard Method for calculating local housing need to support the Government's ambition of delivering 1.5 million new homes nationally. Before this change, Greater Cambridge had a 5-year housing land supply (5YHLS) of 6.5 years, supported by strong 2023 Housing Delivery Test results: 114% for Cambridge and 153% for South Cambridgeshire.
- 4.22 Following the changes the joint housing target for Cambridge City and South Cambridgeshire rose from 1,726 to 2,309 homes per year. The Greater Cambridge Housing Trajectory and Housing

Land Supply Report (April 2025) confirms that, under the higher targets, the councils now have a reduced 5.5-year supply for 2025–2030. A new buffer, combined with the increased requirement, means Greater Cambridge must demonstrate a deliverable supply of just over 12,100 homes over the next five years.

- 4.23 The emerging Greater Cambridge Local Plan (GCLP) is currently at Regulation 18 with consultation of the draft plan expected to run over Q4 2025 into Q1 2026. The draft consultation document outlines that there will be a need for a minimum of 48,195 new homes to meet the area’s full demographic, affordable, and specialist housing needs. Given this scale of need, we anticipate that Greater Cambridge’s housing requirement will rise further, creating a risk that the area will struggle to maintain a 5-year supply in the short-term. An update on the 5YHLS position is expected in spring 2026 when the Annual Monitoring Report for 2024/25 is scheduled to be published.
- 4.24 Within the South Cambridgeshire Local Plan (2018), Sawston is identified in the settlement hierarchy as a Rural Centre, reflecting its position as one of the most sustainable villages within the district with good public transport links to Cambridge or a market town. Sawston continues to be recognised as a Rural Centre within the draft GCLP where it states that in ‘Rural Centres’ there will be no limit on how many homes can be built on a single site within the village framework. Whilst the site currently lies outside the settlement framework, it would represent a logical extension to the village whilst helping to meet the draft local plan’s significant housing requirements.
- 4.25 **c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and**
- 4.26 The site benefits from a highly accessible and well-connected location, with a wide range of services and facilities nearby. Whittlesford Parkway railway station is approximately 3km from the site. Shelford railway station also lies approximately 4km from the site. Both stations offer direct rail connections to Cambridge city centre and London, which offer links to other regional destinations.
- 4.27 The Stagecoach Citi 7 bus service runs through Sawston, with the closest bus stop within 1km of the site. This bus route provides connections from Saffron Walden – Sawston – Cambridge City Centre. From Sawston to Cambridge, buses run every 20 minutes during the daytime.
- 4.28 National Cycle Route 11 runs along Mill Lane and New Road to the south of the site connecting Sawston to Cambridge City Centre as well as neighbouring villages including Stapleford, Whittlesford, Duxford and Hinxton. Further improvements for pedestrian and cyclist connectivity are due to be delivered under the forthcoming Sawston Greenway project.
- 4.29 A variety of convenience services are located within 1.2 km of the site, including a Central Co-op Foodstore, Sawston Post Office, Boots Pharmacy and other village amenities.
- 4.30 The area offers strong educational provision with Icknield Primary School, Bellbird Primary School, and Sawston Village College within walking distance.
- 4.31 South Cambridge Business Park and Unity Campus are located around 2.5 km from the site, offering access to employment within the village. The Wellcome Genome Campus is also located within 6km of the site.
- 4.32 The site is also within walking and cycling distance of open recreational spaces within Sawston that supports healthy lifestyles and recreational activities.

- 4.33 The site is therefore considered to be in a sustainable location with a range of services and amenities, offering a genuine choice of transport modes and will promote sustainable transport in line with paragraphs 110 and 115 of the Framework. As such, the site would comply with criterion c of paragraph 155 of the NPPF.
- 4.34 **d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.’**
- 4.35 Paragraph 156 of the Framework requires sites subject to a planning application involving the provision of housing in the Green Belt to make the following contributions:
- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;
  - b. necessary improvements to local or national infrastructure; and
  - c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.
- 4.36 Paragraph 157 states that the affordable housing contribution to satisfy the ‘Golden Rules’ is 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. South Cambridge District Council policy H/10 requires that 40% of homes are affordable housing, therefore the scheme will be required to deliver 50% affordable housing.
- 4.37 The Site is able to make any necessary improvements to local or national infrastructure arising through the proposals and would provide new, or improvements to existing, green spaces which are available to the public.
- 4.38 The Site is wholly capable of delivering a scheme that meets the ‘Golden Rules’.

## 5.0 Conclusion and Summary

- 5.1 For the reasons set out above, the site constitutes grey belt in accordance with the NPPF (2024) and the Green Belt PPG (2025). Development of the site should not be considered 'inappropriate development' in the Green Belt. As such, paragraph 153 and whether very special circumstances exist, is not a determinative test for this site.

# APPENDIX A

## GREEN BELT ASSESSMENT - METHODOLOGY

GREY BELT ASSESSMENT	
Does the site comprise previously developed land?	No
Does the site constitute land within, or contain areas or assets listed in Footnote 7 (other than Green Belt) of the NPPF?	No
CONTRIBUTIONS TO THE GREEN BELT	
Purpose	Bidwells Assessment
Purpose a) to check the unrestricted sprawl of large built-up areas.	Does not contribute
Purpose b) to prevent neighbouring towns from merging into one another.	Does not contribute
Purpose d) to preserve the setting and special character of historic towns.	Does not contribute
<b>Conclusion on Step 1 – The Site is Grey Belt</b>	
Paragraph 155 Assessment	
a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.	Given the site's location, it is considered that development would not fundamentally compromise the overall purposes of the remaining Green Belt.
b) There is a demonstrable unmet need for the type of development proposed.	The site represents an appropriate location for residential development, and aligns with well with the surrounding uses.

c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.	The Site is considered to be in a sustainable location, given its proximity to a range of key services within walking distance. It also benefits from access to regular bus services connecting Sawston to Cambridge enhancing its overall connectivity and accessibility.
d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.	The site has the ability to meet the 'Golden Rules'
<b>Conclusion on Step 2 – The proposal is able to comply with paragraph 155, including the Golden Rules and therefore, can be considered to be not inappropriate development and thus, there is no Green Belt harm.</b>	



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