Representations on behalf of Turnstone Real Estate Limited

Draft Greater Cambridge Local Plan Regulation 19 Consultation

25 September 2026

Q250022

Report

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1 Introduction and Overview

1.1 This document has been prepared by Quod on behalf of Turnstone Real Estate Limited ("TREL") in relation to land to the south of Butt Lane, Milton ("the Site").

1.2 This document responds to the Greater Cambridge Shared Planning's ("GCSP") consultation on the Greater Cambridge Local Plan ("GCLP"): Proposed Submission Regulation 19 Consultation.

1.3 TREL previously submitted representations to the Regulation 18 consultation promoting the Site for employment-led development. These representations build on the conclusions of that earlier submission and update TREL's position having regard to the Proposed Submission GCLP and its supporting evidence base.

1.4 The Site is owned by the Diocese of Ely ("the DoE"). TREL has been selected as the DoE's development partner and the parties have been working collaboratively to develop proposals for the sustainable redevelopment of the Site.

1.5 TREL and the DoE consider that the Site offers a unique opportunity to assist and contribute to meeting the employment growth requirements of Greater Cambridge in a sustainable manner. In particular, the Site:

- Is well located on the urban fringe, meeting the specific locational requirements of the trade counter and wholesale sub-sector of the industrial land market;
- Offers immediate access to the local road network;
- As established in the GCLP Regulation 19 Evidence base, the Site represents Grey Belt land and hence will have no adverse impact on the wider Green Belt;
- Is deliverable immediately to assist in meeting the urgent need of the industrial land sector, particularly for uses already/due to be displaced to enable mixed use development to be delivered on large, allocated sites.

1.6 These representations are structured as follows:

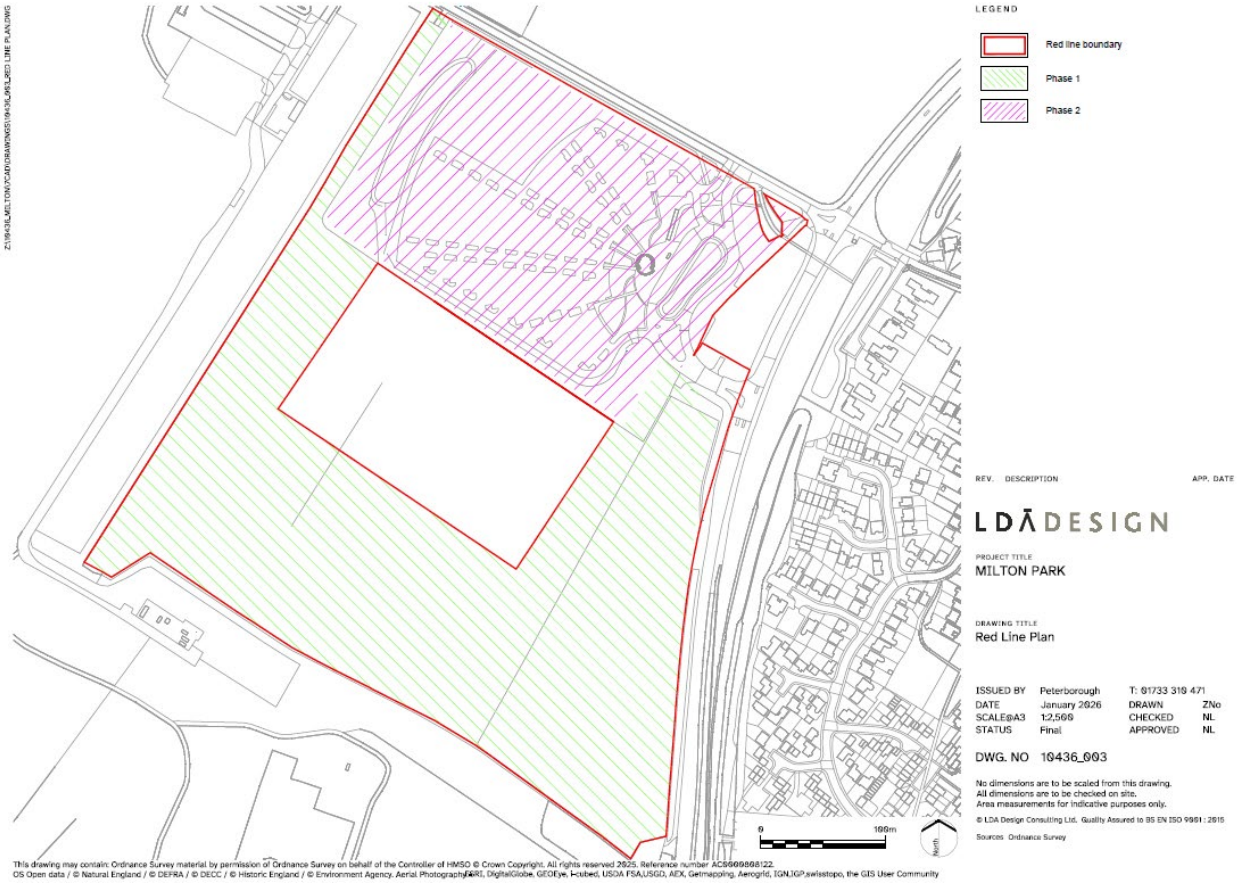
- **Section 2**: Site and Surrounding Context
- **Section 3**: Green Belt – Policy S/GB
- **Section 4**: Employment – Policy S/JH and S/DS
- **Section 5**: Technical
- **Section 6**: Summary

2 Site & Surrounding Context

2.1 The Site comprises land to the south of Butt Lane, immediately north-east of Cambridge and west of Milton. Milton is identified as a Minor Rural Centre in the GCLP. The Site is broadly rectangular, predominantly flat and currently comprises a combination of transport infrastructure and agricultural land.

2.2 The Site location and boundary are shown in Figure 2.1.

Figure 2.1 The Site



2.3 The northern part of the Site accommodates the existing Milton Park and Ride, comprising a surface-level car park with approximately 800 spaces. The facility is owned by the Diocese of Ely and leased to Cambridge City Council.

2.4 To the south of the Park and Ride is land accommodating a new police station. This land is excluded from the Site promoted through these representations. The remaining land to the south, east and west of the police station is in agricultural use.

2.5 The eastern boundary of the Site is defined by the A10, which separates it from the built-up area of Milton. An existing pedestrian bridge across the A10 provides a connection between the Site and the residential communities within Milton. The Site also benefits from existing vehicular access from the A10 and Butt Lane.

2.6 Under the adopted South Cambridgeshire Local Plan 2018 Policy S/4 and the emerging GCLP Policy S/GB, the Site is wholly designated as Green Belt. However, the GCLP Regulation 19 evidence base document (Green Belt Assessment) assessed the Site to be 'provisionally grey belt', this is assessed further in Section 3.

Surrounding Context

2.7 Butt Lane defines the northern boundary of the Site, which is characterised by established trees and hedgerows with some existing gaps. Agricultural land lies beyond Butt Lane to the north.

2.8 The southern and western boundaries are defined by a public drain, established tree planting and hedgerows. Beyond this vegetation lies the Milton Landfill site, while the Milton Household Recycling Centre is located to the north-west.

2.9 The Site occupies a highly accessible location close to the strategic highway network. The A14 and its interchange with the A10 are approximately 200 metres to the south.

2.10 The surrounding context therefore comprises a combination of transport, public services, waste-management and agricultural uses. The Park and Ride, police station, A10, Milton Landfill and Household Recycling Centre influence the character of the Site and distinguish it from the wider open countryside to the north.

Relevant Planning History

2.11 The Site and its immediate surroundings have been the subject of recent planning permissions that are relevant to its current character and Green Belt context.

2.12 In March 2021, planning permission Ref. 20/04010/FUL was granted for a new police station within the central part of the wider landholding. The permission comprised a two-storey building containing offices, a custody suite and associated facilities, together with access roads, hardstanding, parking and landscaping. The permission was subsequently varied, and construction works had commenced by the time of the Regulation 18 representations. The police station land is excluded from the Site now promoted.

2.13 In assessing the police station proposals, the officer accepted that the land had limited landscape value and that its sensitivity was reduced by the adjoining Milton Park and Ride and landfill uses. The officer report also recognised that the Site's landscape and visual characteristics reduced the sense of openness ordinarily associated with the countryside surrounding Cambridge.

2.14 In July 2025, planning permission Ref. 25/01460/FUL was granted for an electric vehicle charging hub immediately east of the police station and south-east of the Park and Ride. In determining that application, the officer concluded that the application site constituted Grey Belt land and that the development would not fundamentally undermine the purposes of the remaining Green Belt.

2.15 These decisions are important to understanding the present context of the Site. In particular, the police station approval and its subsequent construction have materially altered the immediate development context and informed the assessment of the Site in the GCLP Regulation 19 Evidence Base. The implications of the planning history for the Site's identification as Grey Belt and its suitability for allocation are considered further in Section 3.

Summary of Proposed Development

2.16 TREL, working with the Diocese of Ely, is promoting the Site for employment-led development to help meet the identified needs for industrial floorspace in Greater Cambridge. The proposals are particularly intended to accommodate displaced industrial occupiers and the needs of trade counter, wholesale and MidTech businesses that require an accessible urban-edge location close to Cambridge and their customer base.

2.17 The proposals envisage development being delivered in two phases. Phase 1 comprises the agricultural land to the south of the police station and would provide approximately 32,500 sqm of employment floorspace within units ranging from approximately 250 sqm to 2,500 sqm.

2.18 Phase 2 relates to the existing Milton Park and Ride and represents a longer-term opportunity that would arise only if a strategic decision were made to relocate or remodel the facility. Neither TREL nor the Diocese of Ely is currently promoting the removal of the Park and Ride. However, should the facility be remodelled or relocated in the future, this previously developed land could accommodate approximately 27,500 sqm of additional employment-led floorspace.

2.19 The proposals therefore seek to make efficient use of a well-connected urban-edge site to provide a range of employment premises capable of responding to identified local requirements. Allocation through the GCLP would establish the principle of employment-led development and provide a plan-led framework for the Site's coordinated delivery. The detailed justification for the proposed allocation is set out in Sections 3 – 5.

3 Green Belt – Policy S/GB

Recognition of the Site as Grey Belt

3.1 TREL welcomes the conclusion in the Regulation 19 Evidence Base Greater Cambridge Green Belt Assessment that the Site comprises Grey Belt land. This conclusion supports the central case advanced through TREL's Regulation 18 representations and reflects the Site's particular characteristics and immediate development context.

3.2 The Site has now been assessed separately from the wider MI1 parcel, which is split into MI1A-C. The Site is represented as MI1B. LUC identifies MI1B as "provisionally Grey Belt", while the Development Strategy Topic Paper identifies it as wholly Grey Belt. The updated assessment recognises the significance of the approved police station, which resulted in the assessed harm arising from the release of the land being reduced from "very high" to "moderate-high".

3.3 The assessment agrees the land does not make a strong contribution to purposes a, b and d, and that its removal does not undermine the wider Green Belt across the plan as a whole.

3.4 These conclusions reflect the Site's relationship with existing and approved development, including Milton Park and Ride, the police station, the electric vehicle charging hub, the A10, Milton Landfill and the Household Recycling Centre. The Council previously accepted through the police station application that the sensitivity of the land was reduced by its relationship with the Park and Ride and landfill, and that its landscape and visual characteristics lowered the sense of openness ordinarily associated with the surrounding countryside.

Green Belt Assessment

3.5 Notwithstanding the welcome recognition of the Site as Grey Belt, TREL maintains its position that the updated Green Belt Assessment does not provide a comprehensive assessment against the requirements of the National Planning Policy Framework ("NPPF").

3.6 The assessment places significant emphasis on the contribution of land to preserving the setting and special character of Cambridge (NPPF Purpose D).

3.7 This approach does not adequately assess each specific purpose of the Green Belt, as established in the NPPF (Policy GB2: Assessing Green Belt Land):

> *The preparation of strategic development strategies should be informed by an assessment of the strategic role of Green Belt land within the strategy area. This strategic Green Belt assessment should take into account the five purposes of the Green Belt, which are to:*
>
> *a) Check the unrestricted sprawl of large built-up areas;*
>
> *b) Prevent neighbouring towns merging into one another;*
>
> *c) Assist in safeguarding the countryside from encroachment;*
>
> *d) Preserve the setting and special character of historic towns; and,*

e) Assist urban regeneration by encouraging the recycling of derelict and other urban land.

3.8 The evidence base should be updated accordingly to align with the NPPF.

Exceptional Circumstances

3.9 The Development Strategy Topic Paper concludes that there are no strategic exceptional circumstances to review Green Belt boundaries. This conclusion is based principally on the Council's position that identified housing and employment needs can be met outside the Green Belt.

3.10 TREL disagrees with that conclusion, which is explained in full in Section 4. The approach does not adequately consider whether the preferred allocations will provide the right type of employment floorspace in the right locations or at the point when it is required.

3.11 As explained further in Section 4, the Plan does not provide an effective spatial or phasing response to the displacement of businesses from existing industrial areas. Nor does it demonstrate that suitable premises will be available close to Cambridge for trade counter, wholesale and other population-serving occupiers that depend on proximity to their existing customers.

3.12 The particular locational requirements of these businesses, together with the substantial industrial floorspace requirement and the limited supply of suitable and deliverable urban-edge sites should form an important part of the exceptional circumstances case. These matters have not been adequately addressed through the Council's strategic assessment.

3.13 The conclusion that exceptional circumstances do not exist is therefore not justified.

Identification of the Most Appropriate and Sustainable Sites

3.14 Even if it were concluded that there are no exceptional circumstances for a wider review of Green Belt boundaries, the GCLP should nevertheless seek to identify the most appropriate sustainable sites to meet its requirements. Grey Belt status is not, in isolation, a reason to allocate land. However, it is a highly relevant consideration when comparing other development opportunities.

3.15 The Council's own evidence recognises that locations on the edge of Cambridge can offer important sustainability advantages, including proximity to existing jobs, services and communities, greater opportunities for travel by sustainable modes, and a reduced need for wholly new infrastructure. However, the development strategy places overriding weight on avoiding Green Belt release rather than balancing Green Belt considerations against the Plan's wider sustainability, climate and economic objectives.

3.16 A sound development strategy should assess the individual merits of potential sites. This is particularly important where the alternative locations do not meet, as successfully, the same identified locational or delivery requirements.

Sustainability and Employment Role of the Site

3.17 The Site is well placed to meet the specific requirement for employment premises on or close to the Cambridge Urban Fringe. It benefits from existing access from the A10 and Butt Lane,

is approximately 200 metres from the A10/A14 interchange and is connected to Milton by the existing pedestrian bridge over the A10.

3.18 These characteristics make the Site particularly suitable for trade counter, wholesale, MidTech and other population-serving industrial occupiers that need to remain close to Cambridge and their established customer base. The Site could provide suitable premises for businesses displaced through the redevelopment of existing employment areas, helping to support the delivery of other allocations within the GCLP.

3.19 The Site is capable of contributing employment floorspace without requiring development within a more sensitive or higher-performing part of the Green Belt. Its immediate context is already influenced by sustainable transport, public services and waste-management infrastructure, and the Council's own evidence now accepts that the Site constitutes Grey Belt.

Selective Green Belt Release

3.20 The GCLP does not adopt an absolute position against altering the Green Belt boundaries. The Council has already accepted that selective Green Belt release may be appropriate where it considers that particular site-specific circumstances justify that approach, such as with Cambridge Biomedical Campus and Babraham Research Campus.

3.21 The Site should be considered through the same site-specific lens. Its accepted Grey Belt status, sustainable location, ability to meet a particular employment requirement and relationship with existing and approved development distinguish it from higher-performing Green Belt land.

Conclusion and Proposed Modification

3.22 The Regulation 19 evidence accepts the central premise of TREL's previous representations by identifying the Site as Grey Belt. However, the GCLP does not carry that conclusion through into the selection of employment sites.

3.23 The failure to allocate the Site is not justified by the evidence. The Council's strategic conclusion that development needs can be met outside the Green Belt does not adequately address the location, timing and nature of industrial premises required, including the needs of displaced and population-serving businesses.

3.24 TREL therefore requests that the GCLP be modified to remove the Site from Green Belt and allocate it for employment-led development. This would direct development towards a sustainable and well-contained Grey Belt site capable of meeting an identified employment need without fundamentally undermining the purposes of the remaining Green Belt.

4 Employment – Policy S/JH and Policy S/DS

Employment Growth

4.1 TREL's Regulation 18 representations objected to the level of employment growth planned for through Policy S/JH. They concluded that the proposed jobs figure did not reflect the scale of Greater Cambridge's economic ambition and that the associated industrial and warehousing requirement did not adequately account for displaced occupiers, ageing industrial stock and suppressed demand. TREL maintains that position.

4.2 The Regulation 19 evidence recognises that scenarios involving higher levels of employment growth exist. However, the Council has retained a forecast of approximately 73,200 additional jobs between 2024 and 2045 and an industrial and warehousing requirement of 317,000 sqm. Higher-growth scenarios have been discounted on the basis that they are considered aspirational or illustrative, rather than sufficiently evidenced forecasts for Local Plan purposes.

4.3 At the same time, the Council recognises the Government's objective for Cambridge to be a focus for transformational growth. This direction of travel has become clearer since the Regulation 18 consultation, including through the creation of the Development Corporation and the associated intention to accelerate growth across Cambridge.

4.4 The GCLP does not adequately respond to this changing context. Instead of providing sufficient flexibility and capacity to support the Government's growth ambitions, Policy S/JH continues to plan on the basis of a 'business as usual' approach, rather than a growth-led mindset that responds to clearly stated Government objective. This risks establishing a minimum position that does not reflect the scale of growth likely to come forward over the plan period.

Displaced Employment Uses

4.5 The Regulation 19 evidence acknowledges that the redevelopment and loss of older industrial stock will displace existing floorspace and occupiers. Insufficient allowance of replacement floorspace is included within the overall industrial and warehousing requirement, and furthermore the GCLP does not provide a clear spatial, phasing or relocation strategy for the businesses affected or the users that currently rely on them.

4.6 This is particularly important for trade counter, wholesale and other population-serving businesses whose operations depend on remaining close to Cambridge and their established customer base. Insufficient replacement floorspace and the absence of strategic planning mean that suitable premises will not be available in the locations or within the timescales required.

4.7 This concern is reinforced by the reliance on employment floorspace within large and complex mixed-use allocations. Where existing employment land is required to enable those allocations to come forward, suitable replacement premises should be available before existing businesses are displaced. The emphasis on larger sites that will take many years to come forward means that replacement floorspace will not be available as required, which will result in unaddressed needs and/or unsustainable transport patterns.

4.8 The employment land requirement and the spatial consequences of displacement cannot therefore be considered separately. The absence of a clear source of suitably located employment land on the Cambridge urban fringe which is deliverable in the short term, is a clear deficiency that results in the plan being unsound. This forms an important part of the exceptional circumstances case considered in Section 3.

Role of the Site

4.9 The Site provides an opportunity to respond to these specific needs. Its accessible urban-edge location, proximity to Cambridge and established connections to the local and strategic road network make it suitable for displaced industrial businesses and trade counter, wholesale, MidTech and other population-serving occupiers.

4.10 The Site is capable of providing units within the size range required by these occupiers and could be delivered without relying on the longer-term implementation of a large mixed-use allocation. It would therefore provide a practical relocation opportunity for businesses that need to remain close to Cambridge and their existing customers, as well as meat general employment needs.

4.11 Allocating the Site would complement the wider employment land supply by providing appropriately located premises capable of meeting needs that are not adequately addressed through the GCLP's preferred allocations. It would also assist the relocation of employment floorspace from existing industrial areas and, in turn, support the timely delivery of the strategic allocations from which that floorspace is displaced.

4.12 TREL therefore considers that Policies S/JH and S/DS are not justified or effective in their current form. The GCLP should be modified to allocate the Site for employment-led development to meet these specific needs.

5 Technical

5.1 Policy S/EOC and Policy S/RRA set out site allocations on the edge of Cambridge and the rest of the Rural Area respectively. The Site occupies a location which could arguably fall into either of these two categories.

5.2 For reasons described earlier in these representations the Site has an important role to play in assisting in meeting the need for general industrial floorspace, including in supporting the displacement of existing floorspace lost through mixed-use allocations.

5.3 The Council has previously assessed the Site through the Housing and Economic Land Availability Assessment ("HELAA") process. This assessment was revised in 2026 as part of the Regulation 19 Evidence Base, and the revised HELAA confirms that the Site is suitable across most of the criteria, achieving a RAG score of 'Green' or 'Amber', including:

- Flood Risk (Amber) – whilst the Site is wholly in Flood Zone 1, small elements (up to 10%) are subject to surface water flood risk which can be managed through on-site mitigation
- Biodiversity (Amber) – no priority habitats recorded on site, albeit boundary features likely to have ecological value which can be addressed through scheme design.
- Open Space/Green Infrastructure (Green)
- Historic Environment (Green)
- Archaeology (Green) – revised from Amber since the 2025 HELAA having considered the updated site context regarding the police station.
- Accessibility (Green)
- Site Access (Green) – revised from Amber since the 2025 HELAA having considered the updated site submission details.
- Transport and Roads (Amber) – any potential impact capable of being mitigated.
- Noise, Vibration, Odour and Light Pollution (Amber) – any potential impacts capable of being mitigated.
- AQMA (Amber) – any potential impacts capable of being mitigated
- Contaminated Land (Amber) – conditions required to manage potential historic contamination
- Available (Green)
- Achievable (Green)

5.4 The HELAA exercise confirms agreement that none of the above criteria are considered obstacles to the realisation of development on the Site.

5.5 In the reviewed 2026 HELAA, the only criterion where the Site scored 'Red' relates to Landscape. This remains unchanged from the 2025 HELAA. The assessment concludes the following:

"We have reviewed the submitted additional information, including LVA, vision document and supporting statement. We note the LVA position that the rural character of the site is compromised by development of the police station and EV charging post on adjacent land. However, we consider that these features have led to a landscape increasingly sensitive to further development. Development would cause a tilt in the landscape character from rural, albeit with detractors, to urban, comprising the established relationships between settlements, and the rural landscape surrounding them. Development of the site would lead to irreversible loss of rural character, which would not be possible to mitigate".

5.6 TREL does not agree that landscape considerations represent an overriding constraint to development at the Site. As set out in the Regulation 18 representations, TREL commissioned LDA Design to prepare a Landscape and Visual Appraisal to assess the likely landscape and visual effects of the proposed development.

5.7 In respect of landscape character, the Appraisal identifies the Site as forming part of the Cottenham Fen Edge Claylands Landscape Character Area. However, it explains that the southern part of the character area is already influenced by urban and infrastructure uses, including Milton Park and Ride, the A10 and the police station. Milton Landfill also represents an incongruous feature within the otherwise flat and low-lying landscape, with made ground rising approximately 15 metres above average ground levels. The Appraisal records that surrounding landscape was assessed as having Medium-Low sensitivity to development and that the woodland blocks to the west of Milton would assist in mitigating the effects of development.

5.8 The Appraisal concludes that the Site is of Community Value and that appropriately designed development would not undermine the key characteristics of the surrounding landscape. It also identifies opportunities for a landscape-led scheme to enhance green infrastructure and respond positively to the relevant landscape guidelines.

5.9 In visual terms, the Appraisal finds that the raised landform and vegetation associated with the Milton Landfill contain views from the south and west, while the substantial tree belt along the western edge of Milton and adjacent to the A10 provides further enclosure. Potential visibility is therefore principally limited to the north, where views are fragmented by existing woodland and tree planting along Butt Lane and within Milton Park and Ride, together with the police station development.

5.10 The Appraisal identifies the visual receptors most likely to experience changes as users of the adjoining local road network, Milton Park and Ride and the pedestrian bridge across the A10. Changes in views from Landbeach, approximately 1.4 kilometres to the north-east, would be distant and barely perceptible, while effects on other visual receptors within the study area would be negligible. The Appraisal therefore concludes that the visual effects of development would be extremely localised, principally within close proximity to the northern and eastern Site boundaries.

5.11 On this basis, the Appraisal concludes that potential landscape and visual effects could be appropriately addressed through a landscape-led design. The identified design opportunities include:

- Setting back development from the A10;
- Retaining and enhancing existing hedgerows and trees;
- Introducing tree-lined streets in a geometric pattern reflecting local field patterns;
- Increasing tree canopy cover and strengthening green infrastructure connections;
- Locating larger buildings within the more visually contained western part of the Site;
- Limiting building heights to approximately 12 metres; and
- Integrating the Site's green infrastructure with adjoining consented development.

5.12 The continued Red rating is in direct conflict with the Site-specific evidence submitted at Regulation 18. The HELAA's broad conclusion that development would result in irreversible loss of rural character does not reflect the Site's contained context, the localised nature of the identified visual effects, its relationship with adjoining development or the ability to reduce landscape and visual effects through a landscape-led design.

5.13 The HELAA's conclusion that landscape harm would be significant, unacceptable and incapable of mitigation is difficult to reconcile with the Council's previous assessment of the adjoining police station. The officer report accepted that the land was the least sensitive location due to its relationship with Milton Landfill and Milton Park and Ride, and that its landscape and visual characteristics, and context, significantly reduced the sense of openness ordinarily associated with the countryside surrounding Cambridge.

5.14 In considering the landscape effects of the police station development, the officer report concluded:

"The Landscape Officer agrees with the applicant that following appropriate landscape mitigation works the site is capable of accommodating a development without resulting in material harm to the surrounding countryside's landscape character and views from the wider and local area" (Paragraph 82)

5.15 The same report found that retaining boundary vegetation and providing additional tree and hedge planting would control and screen views, further reducing the limited landscape character and visual effects, particularly from the A10.

5.16 The HELAA does not adequately explain why these previously accepted characteristics, together with the Site's development context, do not reduce its sensitivity to appropriately designed development.

5.17 The Council's previous assessment, together with the Site-specific landscape evidence, demonstrates that appropriately designed development can be accommodated without giving rise to unacceptable landscape or visual effects. Landscape considerations do not represent an overriding technical obstacle to development and should not prevent the Site from being allocated.

6 Summary

6.1 For the reasons set out in these representations, TREL considers that the failure to remove the Site from the Green Belt and allocate it for employment-led development is not justified and would not provide an effective response to the identified need for industrial floorspace in Greater Cambridge.

6.2 The Regulation 19 evidence supports the central case advanced through TREL's Regulation 18 representations. The updated Green Belt Assessment identifies the Site as provisionally Grey Belt, while the Development Strategy Topic Paper identifies it as wholly Grey Belt. The evidence also recognises the effect of the approved police station on the Site's context and reduces the assessed harm arising from its release from "very high" to "moderate-high".

6.3 Notwithstanding these conclusions, the GCLP does not carry the Site's Grey Belt status through into the selection of employment sites. The Council's conclusion that development needs can be met without reviewing Green Belt boundaries does not adequately address the particular location, timing and nature of the industrial premises required. Nor does it appropriately balance Green Belt considerations against the Site's sustainability and ability to meet an identified employment need.

6.4 The GCLP also fails to fully consider the phasing or relocation strategy for employment floorspace displaced through the redevelopment of existing employment areas to facilitate mixed-use allocations. The overall quantitative allowance for replacement floorspace is not sufficient and the employment sites selected do not include suitable land or premises close to Cambridge or within the timescales required by trade counter, wholesale and other population-serving businesses. This concern is reinforced by the increased focus on transformational growth in Cambridge and the creation of the Development Corporation since the Regulation 18 consultation.

6.5 The Site is well placed to respond to these needs. It occupies an accessible and well-connected location on the Cambridge urban fringe, close to the A10 and A14, and is capable of providing appropriately sized premises for trade counter, wholesale, MidTech and other population-serving occupiers. Allocation of the Site would complement the wider employment land supply and support the timely delivery of the strategic allocations from which existing floorspace may be displaced.

6.6 The revised HELAA confirms that the Site is suitable across most of the assessed technical criteria, with Green or Amber ratings relating to flood risk, biodiversity, green infrastructure, the historic environment, archaeology, accessibility, access, transport, amenity, air quality and contaminated land. It also confirms that the Site is available and achievable. The only Red rating relates to landscape.

6.7 The Site-specific Landscape and Visual Appraisal demonstrates that development could be accommodated through an appropriate landscape-led design. The Site is influenced and contained by existing and consented development, infrastructure, vegetation and the raised landform associated with Milton Landfill. Potential visual effects would be localised and could be reduced through the retention and enhancement of existing vegetation, appropriate setbacks, building heights and the positioning of larger buildings within the more visually contained parts of the Site. Landscape considerations therefore do not represent an overriding technical obstacle to development.

6.8 Overall, the failure to allocate the Site renders Policies S/GB, S/JH and S/DS unsound, as they are not justified or effective. The Site's accepted Grey Belt status, sustainable location, ability to meet specific industrial requirements and absence of overriding technical constraints provide a clear basis for its allocation.

6.9 TREL therefore requests the following modifications to the GCLP:

Amend the Policies Map to remove the Site from the Green Belt and allocate it for employment-led development under either Policy S/EOC or Policy S/RRA, as an appropriate site-specific policy providing a plan-led framework for its delivery.

6.10 These modifications would direct employment development towards an accessible, deliverable and well-contained Grey Belt site; provide appropriately located premises for displaced floorspace and population-serving businesses; and enable the GCLP to respond more effectively to Greater Cambridge's employment requirements and wider growth ambitions.

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