TECHNICAL NOTE: LANDSCAPE & GREEN BELT REVIEW

British Land

Land at South Trumpington, Cambridge

September 2026

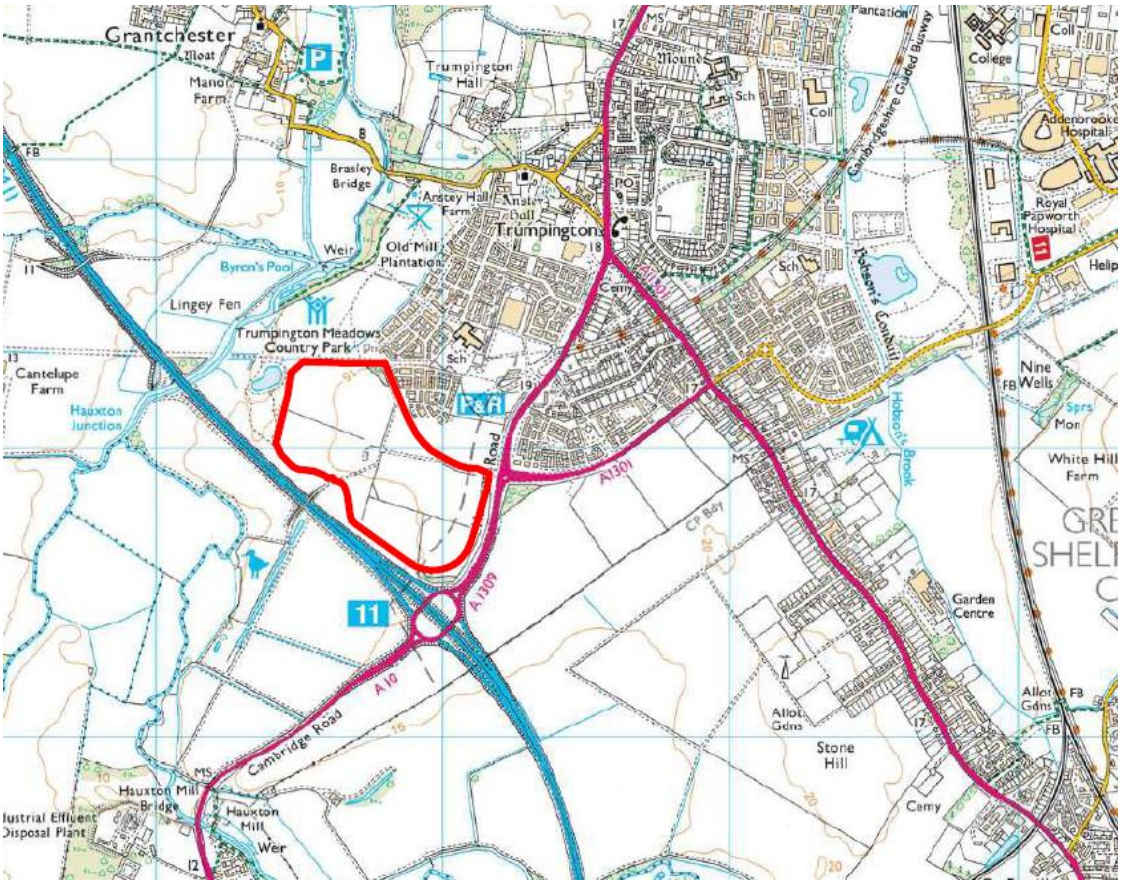
1.0 INTRODUCTION

1.1 This Technical Note (TN) focuses on a Site identified in the Greater Cambridge Local Plan, Housing and Economic Land Availability Assessment (HELAA) as reference 40048 and in Greater Cambridge Green Belt Assessments (GCGBA) as parcel TR6. The Site is wholly owned and promoted by British Land.

1.2 The purpose of this TN is to review and comment on Landscape and Green/Grey Belt matters as part of the Greater Cambridge Local Plan (GCLP) 'Regulation 19 Consultation' exercise, including responses to the updated evidence base.

Site Location

1.3 The Site (ref: 40048) is located to the south of Cambridge on the edge of Trumpington, as shown below.



2.0 GCLP REGULATION 19 EVIDENCE

2.1 Since the Regulation 18 consultation in 2025, Greater Cambridge have issued updated documentation and evidence that has relevance to landscape matters and green and grey belt matters. The documents are:

- New and updated Green Belt evidence
- Updated HELAA

2.2 This TN touches on Landscape matters, but there is no new evidence to consider and so previous comments remain unchanged. The primary focus of this TN is on the updated Green Belt evidence, as this work informs the landscape and green belt comments and justifications set out in the Topic Paper and HELAA summaries.

2.3 A number of published documents relate to Green Belt and fall under the 2026 update to the '*Greater Cambridge Green Belt Assessment*'. In brief they comprise:

- A June 2026 document prepared by LUC titled, '*Response to comments from Site Submissions Update and Draft Local Plan Consultation*'. This considers representations by site promoters (for example at Regulation 18 consultation) that challenge the findings of the 2021 GCGBA or which apply more recent national guidance including grey belt analysis, and
- A July 2026 document prepared by LUC titled, '*Review following changes to National Policy and Guidance*', which is essentially a complete update to the 2021 Green Belt work that incorporates the findings of the June 2026 'Response to comments' work above.

3.0 LANDSCAPE MATTERS

3.1 A full Landscape and Visual Appraisal (LVA) was prepared by FPCR and submitted as part of the Reg 18 reps in January 2026. It covered landscape sensitivity, change and overall effects from a national scale down to a consideration of the Site itself and its immediate context. As part of this work, it reflected on landscape evidence published jointly by Cambridge City Council and South Cambridgeshire District Council (herby referred to as Councils'). A key part of this evidence was The Greater Cambridge Landscape Sensitivity Assessment (GCLSA).

3.2 The GCLSA was dated 2025 in the online GCLP evidence base library, however, the document itself remains dated at November 2021 and the study and findings do not appear to have changed. As such, this work dating from 2021, appears to remain the most recent evidence around landscape sensitivity.

3.3 Within this 2021 study, the Site falls across two landscape parcels, the western portion of the Site falls within parcel CSF08, and the central and eastern portions of the Site fall within CSF07.

3.4 The sensitivity of CSF08 to development is noted as being High in the assessment, however, this is not surprising considering the location and setting of wider tracts of land covered by this parcel. It was noted that sensitivity will vary across the parcel and this was also addressed by the GCLSA, which considered that, "*the M11 and the edge of new development at Trumpington are strong features which are less susceptible to the development scenario".*

3.5 Parcel CSF07 primarily comprises farmland and is strongly influenced by the M11 and A10/A1309 corridors. The GCLSA noted that, *"On balance, this landscape is judged to be of medium to low sensitivity to the development scenario".*

3.6 On this basis the Site and its immediate context range from High to Medium/Low sensitivity according to the assessment.

3.7 The FPCR LVA concluded that the Site and its immediate landscape is of Medium landscape value overall. This would fall within the middle of the range identified by the GCLSA and aligns with the assertion in the GCLSA that edges closer to the M11 and Trumpington urban edge are less susceptible to development. The judgements reached in the FPCR LVA remain unchanged. The Site and its immediate context are not a landscape of uniform sensitivity and development can be successfully incorporated without notable long-term effects on landscape and visual receptors identified in the immediate and wider area.

Landscape references in the Housing and Economic Land Availability Assessment (HELAA)

3.8 Throughout the preparation of GCLP, the HELAA has been updated to respond to the various consultation stages and submitted representations. In relation to this Site (HELAA Site ID: 40048), landscape matters have consistently been identified in the RAG Assessment as 'Red'. Commentary accompanying the RAG rating has evolved from the 2021 and 2023 responses, that focused on landscape character, views and the setting of Cambridge, to increasingly focus on Green Belt function in 2025 and separation in 2026.

3.9 The 2026 Landscape Comments from the Councils' were:

"Having considered the updated site submission details, the assessment score remains red. The site is a large plot of agricultural land between Trumpington Meadows, which forms part of the southern edge of Cambridge and the M11. Cumulatively with the development of the travel hub, development here could begin to see development creep southwards, diminishing the landscape gaps between Cambridge and Hauxton and enveloping part of the M11 into the environs of Cambridge. Development of the site would cause irreversible harm to the setting of Cambridge and degrade the separation between Hauxton and Cambridge".

3.10 Wording and a narrative around 'gap', 'creep', and 'separation' concentrate the discussion around Green Belt harm, and whilst this is related and informed by landscape, it is more of a planning matter, rather than relating to landscape harm. The findings of the detailed LVA work by FPCR, identified limited harm on both landscape and visual receptors. Despite this detailed work, the 2026 RAG 'Landscape' rating remains 'Red'.

4.0 GREEN BELT AND GREY BELT

Previous FPCR Assessment Work

4.1 Previous FPCR Green Belt Assessment work, most recently completed in January 2026 for Regulation 18 consultation, found that the Site should be considered "grey belt", pursuant to the NPPF (2024) glossary definition. The Site did not strongly contribute to any of the national Green Belt purposes (a), (b), or (d), when considered against the 2024 NPPF and 2025 PPG, which were both current at the time.

National Policy Updates

4.2 Since the Regulation 18 consultation and release of new evidence, the NPPF has been updated, with the latest version dated August 2026. The emerging Local Plan is being examined against the December 2024 NPPF.

4.3 The five purposes of the Green Belt are unchanged between the 2024 and 2026 NPPF. However, the methodology for assessing Green Belt contribution has been brought into the Framework itself through Annex E and this is informative because it codifies principles that are directly relevant to the adequacy and robustness of Green Belt evidence. Other updates within the 2026 NPPF include the removal of 'footnote 7' exclusions, for example around heritage, landscape, flooding and ecological areas/assets. These considerations no longer form part of the definition of grey belt itself, although they remain relevant under the respective policy tests when determining whether land should be allocated or developed.

4.4 FPCR remains of the opinion that the Site should be considered "grey belt" when compared to national Green Belt purposes (a), (b), or (d) within the 2026 NPPF.

Greater Cambridge Approach to Green Belt and Grey Belt Assessment

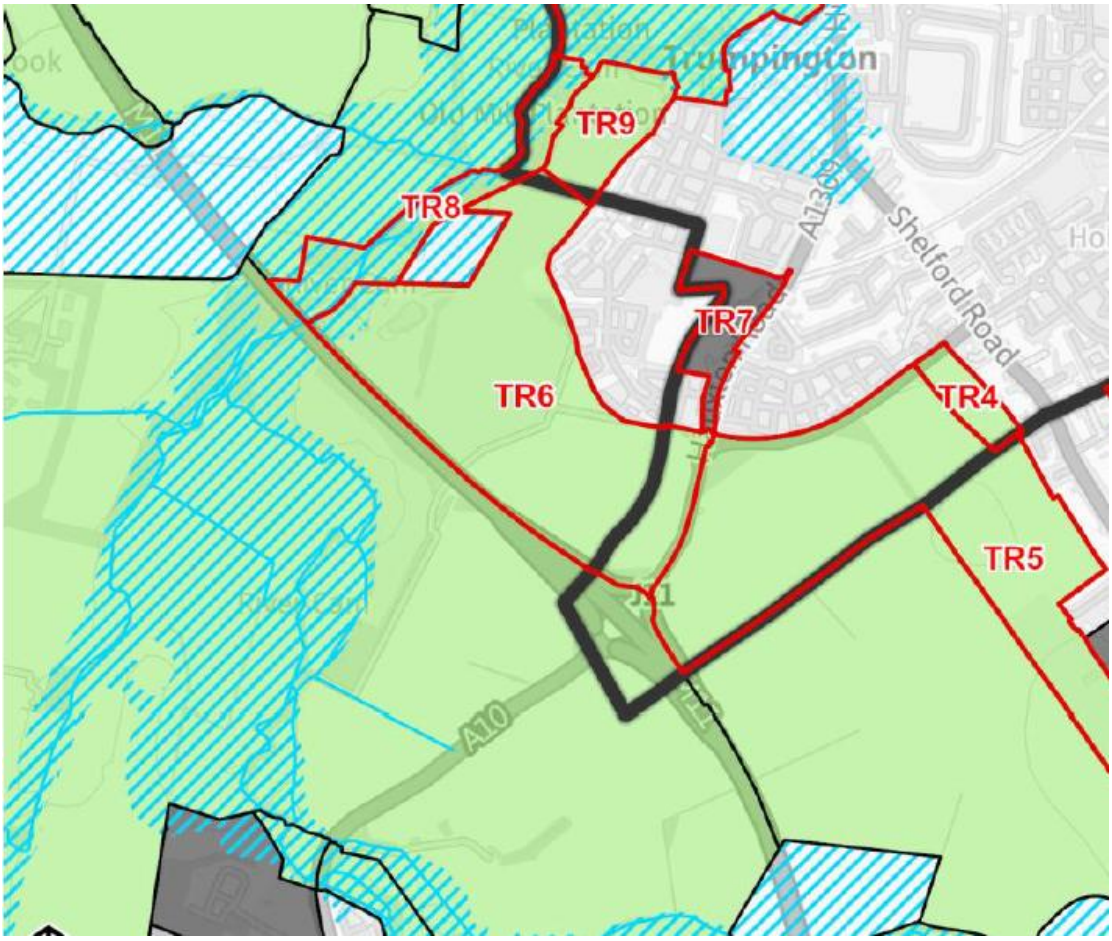
4.5 As with previous Green Belt Assessments for Cambridge, the GCGBA continues to evaluate and draw conclusions on Green Belt harm based on three Cambridge Green Belt purposes, not the five purposes defined by the NPPF.

4.6 This is an important distinction because the GCGBA work adapts the NPPF definition of grey belt and descriptions for purposes a) and b) and correlates them directly with some, but not all of the Cambridge purposes. It then converts all three of the Cambridge purposes to national purpose d) for the purpose of grey belt assessment. Consideration of grey belt in the GCGBA is on the basis of a 'bespoke Cambridge approach' and it is unclear, at this stage, how reliable or robust this bespoke approach is. The GCGBA does not identify how the individual Cambridge purposes relate to national purpose d), even though it would appear to FPCR that national purpose d) relates most closely to Cambridge purpose 2.

4.7 It is considered that the most robust way to assess the potential of land for grey belt would be to use the latest NPPF approach, which has gone through several publication updates and clearly sets out how grey belt is identified and used in both plan-making and decision-taking. This is discussed further below in relation to individual evidence base documents.

Greater Cambridge Green Belt Assessment - 'Response to Comments'

4.8 Within the GCGBA work, and as was the case with previous work, the Site falls within a parcel identified as TR6. Parcel TR6 is marginally bigger than HELAA Site 40048.



4.9 A document titled the '*Greater Cambridge Green Belt Assessment, Response to comments from Site Submissions Update and Draft Local Plan Consultation*', was prepared by LUC in June 2026. This '*Response to Comments*' document, responds to representations for site promoters that challenge the findings of the GCGBA published in August 2021 or which apply more recent national guidance.

4.10 A January 2026 FPCR Green Belt Assessment both challenged findings and applied the latest guidance. As such, the Site (ref: 40048) is covered specifically at Chapter 2, and paragraphs 2.13 to 2.28 directly respond to the FPCR findings (see Appendix A of this TN for the relevant extracts).

4.11 Whilst there is agreement on some matters and levels of harm, there remains a difference of opinion regarding some of the FPCR responses and findings, in particular around: distinction of TR6 from the wider urban area; its character and contribution to the landscape and quality of Cambridge's setting – including its role in views of the city, and; the presence of significant separating features, most notably the M11 and new public transport route and bunding.

4.12 The updated GCGBA takes on board the consented Cambridge South West Travel Hub (SWTH), but argues that it would weaken settlement gap strength and would therefore increase harm

to Cambridge Purpose 3 compared to previous work where it was not considered. Harm to purposes and overall harm as a result are taken forward by the GCGBA work to a grey belt assessment. Grey belt matters are discussed further below within the grey belt section of this TN.

Greater Cambridge Green Belt Assessment – 'Review'

4.13 A document titled the '*Greater Cambridge Green Belt Assessment, Review following changes to National Policy and Guidance*', was prepared by LUC in July 2026. This work appears to follow on from the June '*Response to comments'* document identified above and the discussions and findings accord. The Review seeks to bring the 2021 GCGBA work up-to-date and in-line with national policy. It was published before the NPPF was updated in August 2026 and so NPPF changes outlined earlier in this note have not been considered by the GCGBA work, however, the GCGBA work draws conclusions on grey belt around Cambridge for the first time.

4.14 As noted earlier, the latest GCGBA continues to evaluate and draw conclusions on Green Belt harm based on three Cambridge Green Belt purposes, not the five purposes defined by the NPPF. The GCGBA underlines the history of the three purposes in some detail and at paragraph 3.14 outlines how the NPPF purposes relate to the three Cambridge purposes.

4.15 In relation to the Site, Appendix A of the GCGBA Review includes a set of assessment sheets for TR6, with 'track changes' highlighting modifications to levels of contribution and the accompanying narrative. The 'track changes' reflect policy and physical changes that have occurred around the parcel - as identified by the January 2026 FPCR Green Belt Assessment. For ease of reference the sheets are included at Appendix B of this TN.

4.16 Whilst there is some agreement between FPCR and the GCGBA on some matters and levels of harm, there remain a number of differences of opinion, particularly in relation to harm for purpose 3. In summary:

1. The changes note a reduction in harm for Cambridge Purpose 1 to 'Moderate' - reduced from 'Relatively Significant'. This level is in line with the FPCR assessment which also identified a 'Moderate' Contribution.
2. Contribution to Cambridge Purpose 2 in the update remains 'Moderate'. FPCR considered that TR6 in its current context, makes a 'Relatively Limited' contribution to this purpose.
3. The contribution of parcel TR6 to Cambridge Purpose 3 is increased in the update from 'Moderate' to 'Relatively Significant'. This change, and updates to the wording, reflect the approval of the SWTH. The update essentially describes the cumulative effects of this scheme and wider development with TR6. FPCR maintains that TR6 has a moderate distinction from the settlement edge which rises to between 3 and 4 storeys in height and appears from the parcel as an unbroken line of urban development. This edge is clearly evident across the entirety of parcel TR6.

4.17 When considered overall, the update finds that impact on the adjacent Green Belt from release of parcel TR6 increases from 'Minor-Moderate' to 'Moderate' and overall harm is 'High'.

4.18 In comparison, the January 2026 FPCR assessment considered the SWTH as part of its analysis and found that there would be 'Minor' impact on adjacent Green Belt. The SWTH is linked to the

M11 and extends north, across the M11 and parcel TR6 and reinforces the Hauxton Road corridor into Cambridge. The SWTH has an urban influence that is connected with Cambridge and its presence with TR6 further weakens the distinction of TR6 from settlement. The GCGBA primarily considers the SWTH in terms of cumulative impacts on gap. The urbanising and containing influence it would have on TR6 and the parcel's weakened distinction from countryside is not reflected to the same extent in the assessment. Furthermore, when considering the wider context of TR6, it is evident that a notable portion of the gap between Cambridge and Hauxton is defined by land to the south of the Site and south-east of Cambridge Road (A10). This land extends east from the A10 to meet the M11 and forms a notable landscape gap.

4.19 Overall, the Site makes a negligible difference to the perception of gap. It is a relatively narrow strip of land between the existing residential edge and the M11 and SWTH, which act in combination to form defining and enduring edges. It is considered that any separation on this specific edge of Cambridge is formed by a gap between the SWTH and Hauxton, therefore, the separation and distinction between settlements would remain following completion of the SWTH.

4.20 In overall terms, FPCR found that the harm resulting from the release of TR6, as an expansion of Cambridge, would be 'Low' (paragraph 6.27 of the 2026 FPCR Assessment). This remains a key difference of professional opinion between FPCR and the GCGBA work.

Greater Cambridge Grey Belt Assessment – 'Grey Belt Review'

4.21 As already noted, the three Cambridge Green Belt purposes, not the five purposes defined by the NPPF, are translated through to GCGBA's consideration of grey belt. The Review broadly translates and correlates the two of the Cambridge Green Belt purposes to NPPF purposes a) and b), but does not directly link any of the individual Cambridge purposes to NPPF purpose d), even though it is considered that d) shares much in common with Cambridge purpose 2. Instead, the GCGBA concludes that the qualities of Cambridge's special character and setting, identified in previous work, <u>all</u> relate closely to NPPF Purpose D. The work considers that this purpose is more helpful for the analysis of variations in the role of Green Belt around Cambridge than the other NPPF purposes.

4.22 The consideration of grey belt around Cambridge is undertaken on the basis of harm against the three Cambridge purposes and how they all equally translate to purpose D. The rationale and connection between the three Cambridge purposes and NPPF purpose D is explained at paragraph 3.17 of the GCGBA Review. Because all three Cambridge Purposes are considered by the GCGBA work to '*form elements*' of NPPF Purpose D, should harm against any one of the Cambridge Purposes be deemed to be high, it influences and correlates through to a higher overall level of harm. A 'High' degree of overall harm translates to a 'Strong' contribution to Purpose D (see assessment table at Appendix C of this note for ease of reference).

4.23 It is through this process that the GCGBA '*Response to comments*' and '*Review*' both rebut FPCR's assertion that the Site should be considered grey belt. Through the application of the GCGBA's bespoke grey belt assessment methodology, they find that release of TR6 would lead to a 'High' degree of harm and therefore makes a 'Strong' contribution to purpose D and cannot be provisionally considered as Grey Belt.

4.24 The GCBGA's justification for treating all three Cambridge purposes as components of national Purpose d) is not sufficiently clear. It is unclear, at this stage, how robust the GCGBA's conversion of the combined assessments into a finding that TR6 makes a "Strong" contribution to purpose d). It could be that this is not a reliable basis for rejecting TR6 as potential grey belt.

4.25 At paragraph 3.26, the Review identifies a list of illustrative features from the NPPF that are likely to suggest a strong, moderate or weak contribution to Purpose D. It is noted at paragraph 3.28 that a moderate contribution can include one or more of (but not limited to) the following:

- *"being separated to some extent from historic aspects of the town by existing development or topography;*
- *containing existing development; or*
- *not having an important visual, physical, or experiential relationship to historic aspects of a town."*

4.26 This moderate description (taken from the 2025 PPG, but identical to the 2026 NPPF description) appears to fit well with the situation and context of the Site. This was the finding of the 2026 FPCR Green Belt Assessment.

4.27 The Site is separated from the historic extent and core of Cambridge by a large, highly contemporary, 21st Century development at Trumpington, which weakens the Site's contribution to purpose D. A country park at Trumpington Meadows is becoming established to the west of this recent settlement edge, but it is immature with tree planting, in particular, yet to fully establish. It does not yet possess a sense of being historic, particularly in proximity to the Site and within parcel TR6. The parkland combines with built elements to provide a strong degree of containment and prevent visual or direct experiential association with historic extent of Cambridge.

4.28 Grey belt within the NPPF is assessed across three distinct purposes. The GCGBA focuses specifically on purpose D (GCGBA Table 5.1). Within the NPPF, purpose D is intended to "*to preserve the setting and special character of historic towns*". The illustrative descriptions from NPPF purpose D are not concerned with the role of land as forming a 'gap', or preventing 'merging' of communities. When assessing parcel TR6, the GCGBA descriptive analysis refer most commonly to gap and separation considerations (Cambridge Purpose 3). There is limited reference to historic character and setting when summing up the site's potential for grey belt consideration in the assessment proformas and table. Despite the Assessment work already identifying a 'Moderate' contribution to Cambridge Purpose 2 (considered by FPCR to relate most closely to purpose D), the combined contributions of all three Cambridge purposes feed into a new 'overall' score for purpose D contribution, which changes to become 'High'.

5.0 SUMMARY

5.1 Both the FPCR Green Belt Assessment from 2026 and the GCGBA update agree that the parcel makes a 'Moderate' contribution to Cambridge purpose 1, which shares similarities to NPPF purpose A. This does not translate to a 'Strong' contribution in grey belt terms.

5.2 Contribution to Cambridge Purpose 2, which FPCR consider to be most closely related to NPPF purpose D, remains 'Moderate' in the GCGBA update. Whilst FPCR assessment work found the contribution to be 'Relatively Limited', neither of these outcomes is 'Strong' for the purposes of a grey belt assessment.

5.3 Contribution to Cambridge Purpose 3 / likened to NPPF Purpose B is increased in the GCGBA update from 'Moderate' to 'Relatively Significant'. As set out in this TN, FPCR maintains that the parcel makes a "Relatively Limited" contribution to this purpose and its contribution is not 'Strong'.

5.4 The GCGBA work considers that the qualities of Cambridge's special character and setting, identified in previous work, relate most closely to NPPF Purpose D. Through individual assessment it found that harm to Cambridge Purpose 2 remained 'Moderate' with the update, but then, through a bespoke grey belt assessment methodology that combines all Cambridge purposes, it came to an overall conclusion at table 5.1 that the parcel's contribution to purpose D is 'Strong' by considering Purposes 1 to 3 together. It is unclear, at this stage, how robust the GCGBA grey belt assessment approach is.

5.5 It is considered within this TN, that the most robust way to assess the potential of land for grey belt consideration would be to use the latest NPPF approach, which has gone through several publication updates and clearly sets out how grey belt is identified and used in both plan-making and decision-taking.

5.6 Overall, FPCR maintain that the site does not make a 'Strong' contribution to purposes a), b), or d) or the Cambridge equivalents as summarised in this TN. On this basis, the Councils' conclusion that TR6 should not be treated as provisional grey belt, and the continued "Red" HELAA landscape rating, should be reconsidered. On the evidence reviewed in this TN, landscape and Green Belt considerations do not provide a robust basis for excluding the Site from further consideration as a sustainable edge-of-Cambridge allocation.

Appendix A – Site 40048 extract from the 'Greater Cambridge Green Belt Assessment, Response to comments from Site Submissions Update and Draft Local Plan Consultation'

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

June 2026

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 the that sites 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)

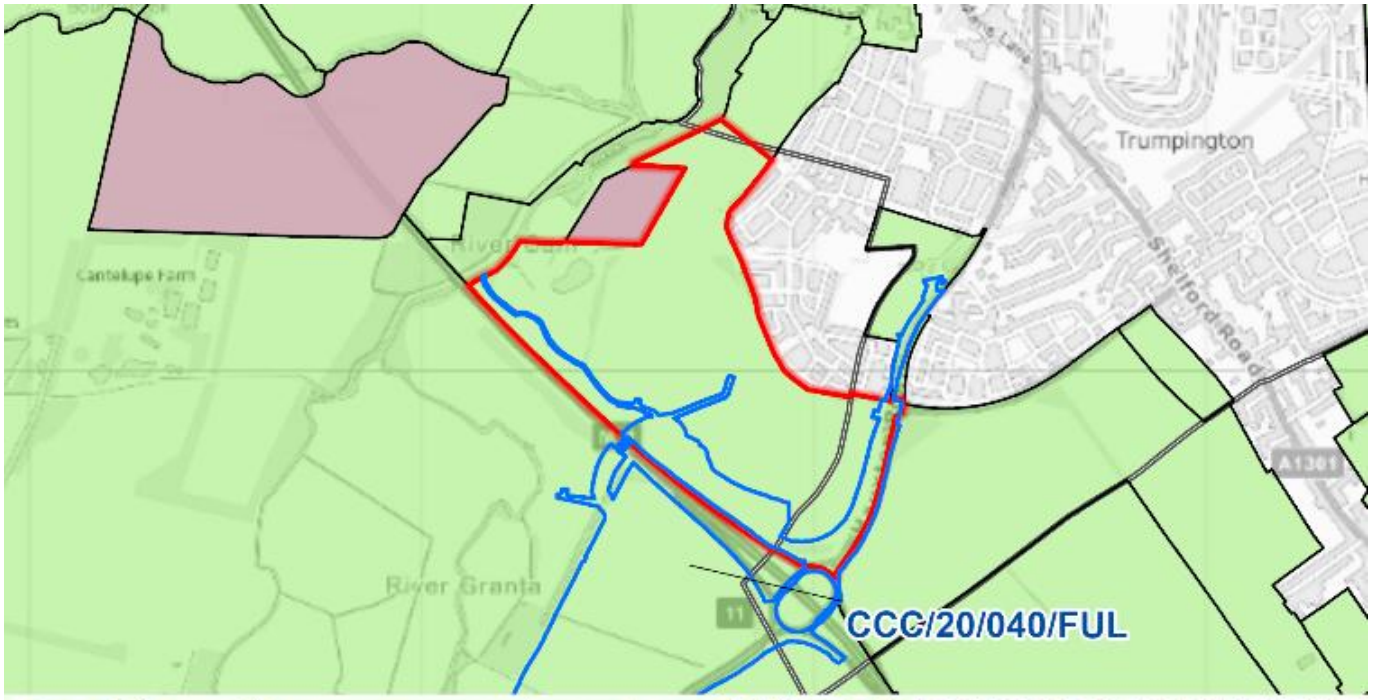
2.29 The Landscape Capacity and Green Belt review (Tor & Co, March 2025) argues that *"… the Site, a small area of a much wider parcel HI8, was found to make a weak or no contribution to all local Green Belt purposes assessed (equivalent to national purposes b and d)"* and that "*Due to its level of 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

Appendix B – GCGBA assessment sheets for TR6, with 'track changes' highlighting modifications to levels of contribution and the accompanying narrative

TR6



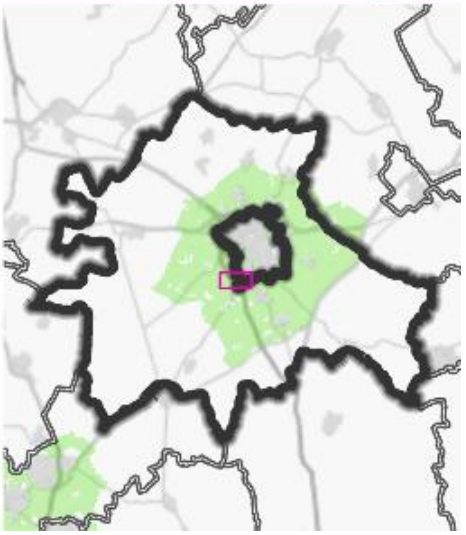


Parcel TR6

Local Authority

Neighbouring parcel

Neighbouring authority



Absolute constraints

Scheduled monument

TR6

Parcel location and openness

Parcel size: 52.68ha

The parcel is located to the south of Cambridge (Trumpington) and to the west of Trumpington Park and Ride. The parcel contains Trumpington Meadows Country Park, and is currently bordered by Hauxton Road to the southeast, the M11 motorway to the west, and the River Cam to the north. A Scheduled Monument lies to the northwest of the parcel (Romano-British settlement SW of Trumpington). Following construction of the Cambridge South West Travel Hub (planning reference CCC/20/040/FUL), the southeastern edge of the parcel will be defined by a new public transport route alongside Hauxton Road and screening bunds will be located alongside the M11.

Land is open. There is no development of a scale, character or form that has a significant impact on Green Belt openness. The public transport route and bunding will affect the parcel boundaries rather than its main body.

Distinction between parcel and inset area

There is no boundary to create distinction between the parcel and the urban area of Cambridge. However, the parcel extends a significant distance from the inset area and therefore views are dominated by open countryside. Furthermore, the parcel is not contained by urban development. Although the landform and land cover within the parcel do not create any additional distinction from Cambridge there is, overall, moderate distinction between the parcel and the urban area.

TR6

Contribution to the Green Belt purposes

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

  Contribution: ~~Relatively significant~~Moderate

  Land is open and adjacent to the main urban area of Cambridge. The parcel has some relationship with the urban area but also a degree of distinction from it,~~.~~ although the new bunding will provide greater visual containment to the west. Overall, the parcel makes a ~~relatively significant~~moderate contribution to Cambridge Purpose 1.

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

  Contribution: Moderate

  Land falls within Trumpington Meadows Country Park and forms part of the immediate setting of a Scheduled Monument to the west (Romano-British settlement site SW of Trumpington). It therefore makes some positive contribution to the character of the landscape and the quality of Cambridge's setting. Whilst land is relatively distant from the historic core of Cambridge and has no direct visual inter-relationship with it (due to intervening built development), it forms part of an open landscape visible on the edge of the city in distant elevated views from the south and south-east (including from St Margaret's Mound and Chapel Hill). Overall, the parcel makes a moderate 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:

  Contribution: ~~Moderate~~Relatively significant

  Land is open and lies in a ~~moderate~~ gap between Hauxton and Cambridge (Trumpington) which, following development of the Cambridge South West Travel Hub, will be relatively narrow. ~~but t~~There are, however, some significant separating features, including the A10, M11 and adjacent bunding (associated with the travel hub) and ~~wooded areas~~tree cover alongside the River Cam. The parcel has some relationship with the urban area but also a degree of distinction from it. Overall, the parcel makes a ~~moderate~~ relatively significant contribution to Cambridge Purpose 3.

TR6

Impact on contribution of adjacent Green Belt

- Release of land as an expansion of Cambridge:

  Rating: ~~Minor m~~Moderate

  Release of land in this parcel would have ~~some limited~~a clear impact on the perceived gap between Trumpington and Hauxton, with development to both sides of the M11 corridor weakening its role in separating urban from open land~~although the M11 would remain as a significant separating feature~~. The parcel is well contained by the M11 to the southwest, and by a shallow wooded valley to the west, but its release would create some urbanising containment of land to the north.

  Land to the east of the parcel does not make a stronger contribution to any of the Green Belt purposes. Any impact on this land would not therefore increase overall harm.

Overall harm of Green Belt release

- Parcel TR6 makes a relatively significant contribution to preventing communities in the environs of Cambridge from merging with the city~~preserving Cambridge's compact character~~, and a moderate contribution to preserving Cambridge's compact character and to maintaining and enhancing the quality of Cambridge's setting ~~and to preventing communities in the environs of Cambridge from merging with the city~~. The additional impact on the adjacent Green Belt of the release of the parcel would be ~~minor~~ moderate. Therefore, the harm resulting from its release, as an expansion of Cambridge, would be high.

High

Appendix C – GCGBA TR6 extract from Table 5.1

Settlement	Parcel Ref	Release Scenario	Area (ha)	Harm	Purpose D Contribution	Provisional Grey Belt?
Cambridge - Trumpington	TR4	Release of land as an expansion of Cambridge	3.39	High	Strong	No
Cambridge - Trumpington	TR5	Release of land as an expansion of Cambridge	73.83	Very High	Strong	No
Cambridge - Trumpington	TR6	Release of land as an expansion of Cambridge	52.68	High	Strong	No
Cambridge - Trumpington	TR7	Release of land as an expansion of Cambridge	5.78	Low	Weak	Yes
Cambridge - Trumpington	TR8	Release of land as an expansion of Cambridge	10.93	Very High	Strong	No
Cambridge - Trumpington	TR9	Release of land as an expansion of Cambridge	7.77	Very High	Strong	No
Cambridge - Trumpington	TR10	Release of land as an expansion of Cambridge	29.06	Very High	Strong	No
Cambridge - Trumpington	TR11	Release of land as an expansion of Cambridge	6.13	High	Strong	No
Comberton	CO1	Release of land as an expansion of Comberton	17.78	Very High	Strong	No
Comberton	CO2	Release of land as an expansion of Comberton	11.09	Moderate High	Moderate	Yes

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