

**LAND EAST OF CAMBRIDGE ROAD, HARDWICK**  
GREEN BELT REVIEW  
HILL RESIDENTIAL LTD & CHIVERS FARM (HARDINGTON) LLP  
DECEMBER 2021



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 DECEMBER 2021



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## 1.0 Introduction

- 1.1 This representation has been prepared on behalf of Hill Residential Ltd and Chivers Farm (Hardington) LLP and reviews the new Greater Cambridge Green Belt Assessment prepared by LUC on behalf of Greater Cambridge Partnership, GCP.
- 1.2 The site at Hardwick was originally visited in March 2019 to prepare a photographic survey and carry out some initial landscape and visual analysis. The information gathered was then incorporated within a visioning document which together with a preliminary Green Belt appraisal was issued as local plan representations in March 2019.
- 1.3 The purpose of this representation is to further substantiate the original promotional material submitted in 2019 in relation to land east of Cambridge Road, Hardwick.

### The site location

- 1.4 The land east of Cambridge Road, Hardwick will, from this point on, be referred to as the Hardwick site. The Hardwick site is located along the eastern boundary of Hardwick, with the western boundary forming the western edge of the Cambridge Green Belt. The Hardwick site comprises two fields. One large arable field occupies the majority of the area with a second smaller field, kept as rough pasture, in the south western corner, surrounding the properties on Kesters Close.
- 1.5 The main parcel is bounded by the trees and hedgerows lining Cambridge Road along the majority of the western boundary, with the exception of properties on Kesters Close and the boundary of number 122 Cambridge Road along its north western corner. St Neots Road forms the northern boundary, and Bin Brook along with its associated riparian woodland edge forms the southern boundary. The eastern boundary can be split into three distinct sections. The northern extent is formed by the western edge of an isolated line of properties along St Neots Road, the middle section is formed by a post and wire boundary between two arable fields and the southern extent is marked by a strip of tree and scrub field boundary vegetation. For the Hardwick site location see figure 1.

### Report structure

- 1.6 The first part of the report provides a general critique of the LUC Green Belt assessment focusing on their methodology, before critiquing the Green Belt assessments in relation to the Hardwick site. The report structure is as follows:
  - Stage 1 – A general commentary on the LUC methodology, highlighting where there are weaknesses, oversights or omissions
  - Stage 2 – A critique of the LUC Green Belt assessment for the parcels in which the Hardwick site is located. This section makes reference to the methodology used and highlight areas of the assessment, assumptions and conclusions that we disagree with

- Stage 3 – Report conclusions re-visiting our preliminary Green Belt assessment work compared to the new LUC assessment. This outlines how the proposed concept master plan for the Hardwick site and the mitigation strategies put forward, respond to the Green Belt

## 2.0 Stage 1 – Review of the LUC Green Belt methodology

### Background to report

- 2.1 Cambridge City Council and South Cambridgeshire District Council are working together to create a joint Local Plan for the two areas, referred to as the Greater Cambridge Local Plan. As part of the evidence base for this plan, LUC were commissioned to undertake a strategic Green Belt assessment. Unlike previous Green Belt assessments undertaken by both authorities, this assessment covers the entire Green Belt around Cambridge rather than just the inner Green Belt, more closely associated with the edge of Cambridge.
- 2.2 Through studying recent case law relating to Green Belt assessments there is now a recommendation, following comments made by some inspectors, that the potential harm to the Green Belt purposes should also be assessed, whereby the exceptional circumstances for the amendment of Green Belt boundaries requires consideration of the nature and extent of harm created by removing an area of Green Belt and its effects on its remaining neighbouring Green Belt land.

### General commentary on LUC methodology

- 2.3 As with previous Cambridge Green Belt assessments, much of the first part of the report is given over to explaining how the 3 Cambridge Green Belt purposes came into existence and how they align with the 5 Green Belt purposes stated in paragraph 138 of the National Planning Policy Framework (NPPF).
- 2.4 LUC state how they have completed Green Belt studies at a range of scales for over 45 English local planning authorities in the past five years and that those that have subsequently been subject to scrutiny at Local Plan Examination have been found to be robust.
- 2.5 Broadly, the methodology and stepped stages used by LUC is both logical and takes account of recent case law and accepted guidance. However, if we have one overriding criticism of this assessment in terms of its methodology it is that it is too complex and confusing. Whilst their document states in paragraph 1.3 that it is “*robust and transparent...*” we feel that in endeavouring to align their assessment criteria with the 3 Cambridge Green Belt purposes, the criteria used for each Green Belt purpose have become exceedingly complex and are far from being transparent, to the point that they are difficult to comprehend.
- 2.6 For this reason, it bears little similarity to their previous Green Belt assessments undertaken for other authorities, such as their Welwyn Hatfield Green Belt Study Stage 3, March 2019 or their November 2018 study for the London Borough of Barnet. In these studies, there are a small number of clear criteria scoring different contribution levels to each Green Belt purpose before the assessment of either openness or harm.
- 2.7 Furthermore, in this new LUC assessment there is a requirement to constantly cross reference to earlier sub-sets of criteria and pages of text outlining notes that require consideration before understanding where a certain parcel ‘scores’ in relation to its contribution to the particular purpose being assessed.

## Identification of parcels

- 2.8 The way in which parcels are defined is complex, confusing and the reasoning behind how the boundaries of each parcel were defined in the assessment of is unclear or too brief.
- 2.9 Rather than considering pre-defined boundaries, parcels were defined by applying an analysis process that works outwards from each inset settlement. For this to work, undefined areas around all inset settlements were assessed against the 3 Cambridge Green Belt purposes in order to ascertain their relevance to each purpose, even though their relevance may change with greater distance from the inset settlement. These were then overlaid with the assessment in the variation of distinction. It is the assessment of distinction that appears to be the most obvious and main way in which LUC have defined the parcels.
- 2.10 However, using this method has led to instances where parcel boundaries cut across undefined open land. The purpose of the LUC assessment is to assess the contribution each parcel makes to the three Cambridge Green Belt purposes. It therefore means that should a parcel be found to have limited to no contribution to the purposes and will overall cause low harm if released then the boundaries for this parcel will follow the same undefined line across open land. This however contradicts with the NPPF paragraph 143, regarding the definition of Green Belt boundaries which under part 'f' states that boundaries should be defined clearly:
- "...using physical features that are readily recognisable and likely to be permanent"*
- 2.11 This parcel definition is another 'layer' of confusion that leads to anomalies when it comes to the assessment of a parcel and/or its neighbouring parcels. This is given greater consideration within stage 2 of this report.

## General critique of the 6 methodology steps to define harm

- 2.12 The LUC methodology has 6 overall steps to define the level of harm that the removal of a particular parcel from the Green Belt may have. We have commented on each of these steps only where we feel there is a weakness in the methodology, or where we disagree with assumptions being made.

### **Step 1: Identify variations in relevance of Green Belt Purpose**

- 2.13 In assessing the relevance of each Green Belt purpose, a series of considerations are provided. With regards to Cambridge purpose 3, paragraphs 3.31-3.35 provide a set of criteria to define the role the gap between settlements performs.
- 2.14 The criteria provided for assessing purpose 3 are given in step 4, table 3.4. This is an example that highlights the problem in the useability of the methodology. In order to understand the criteria in table 3.4 you need to first to cross reference back to the criteria within paragraphs 3.31-3.35, all of which seems unnecessarily confusing.
- 2.15 Furthermore, we fundamentally disagree with the way the criteria provided in paragraphs 3.31-3.35 are used in table 3.4. It implies that inset settlements that

are 2-2.5km apart should be considered as being separated by a moderate gap. We feel that a gap of this distance should be considered a wide gap.

### **Step 2: Identify variations in Green Belt openness**

2.16 LUC state in paragraph 3.37 that:

*“Green Belt openness relates to lack of ‘inappropriate built development’ rather than to visual openness; thus, both undeveloped land which is screened from view by landscape elements (for example tree cover) and development which is not considered ‘inappropriate’, are still ‘open’ in Green Belt terms.”*

2.17 While there is no definitive or agreed definition of openness, case law in combination with relevant planning policy has established important parameters that contribute to openness. All development in the Green Belt that is not stated in the NPPF as being appropriate development will affect openness. However, as recent case law has stated, openness has both a spatial (physical) dimension, and a visual aspect.

2.18 There is an over emphasis the LUC methodology on the volumetric element of openness rather than both spatial and visual. In order to attribute an impact on visual openness it must be accepted that the perception of openness of an area can only be given weight if it can be seen and experienced by a receptor. In terms of landscape assessment, perception is a result of actual experience of the landscape, not an imagined perception.

2.19 Recent case law has acknowledged that the harm to the visual dimension of openness can be limited by both the: contained nature of a site or in respect to its being materially reduced by proposed landscape mitigation.

2.20 Therefore, the test is whether the visual impacts on openness are so obviously material as to require direct consideration. In other words, if a site is well constrained and views of the proposals are limited so as not to be obviously material then the effect on openness must be considered as being limited/reduced.

### **Step 3: Identify variations in distinction**

2.21 This step is another example of an excessively complex methodology with a further layer of considerations and a 4-point scoring system/criteria in relation to how distinct a parcel is using four inter-related elements:

- Boundary features;
- Landform and land cover;
- Urbanising visual influence; and
- Urbanising containment.

2.22 This in turn needs to be understood and cross referenced when trying to use and understand the criteria for Cambridge Green Belt purpose 2, provided in table 3.3 of step 4.

#### **Step 4: Assess contribution to Green Belt purposes and define parcels**

- 2.23 This step provides the actual criteria for assessing the contribution a parcel makes to Cambridge Green Belt purposes 1, 2 and 3 on tables 3.2, 3.3 and 3.4. This is discussed in greater detail in stage 2.
- 2.24 As touched upon in paragraph 2.5, there are too many criteria per level of Green Belt contribution for all 3 purposes. For example, there is a choice of 8 variations for a parcel to contribute moderately for purpose 3. All are variations on a theme with only a change to the size of gap, (identified in the previous criteria in step 1, paragraphs 3.31-3.35), or a single word describing its level of distinction.
- 2.25 However, to understand the level of distinction one must first look at the separate criteria and notes of consideration in step 3 paragraphs 3.36-3.60. Only having carried out all these steps and cross referencing are you able to distinguish which criteria aligns with the contribution of the parcel being assessed.
- 2.26 In trying to be as robust as possible and align the NPPF Green Belt purposes with the Cambridge Green Belt purposes, the overall effect of the methodology is that there are just too many criteria variations to make it clear and transparent and too much potential for misinterpretation of a parcel's contribution. As noted below, the complexity of the scoring seems to determine a level of harm divorced from the reality of the site.

#### **Step 5: Assess impact of release on adjacent Green Belt land**

- 2.27 We do not agree with the assumption made in paragraph 3.113 which states:
- "It is necessary to assume that the land will be developed in order to reflect potential adverse impact, but it is recognised that there is potential for mitigation measures such as boundary strengthening and density of development within an inset area to influence this. Although the nature of development on released land could have some bearing on the strength of adjacent retained Green Belt land, it is unlikely to radically alter assessment outcomes." (emphasis added)*
- 2.28 This statement suggests that no matter how effective boundary strengthening to a developed parcel could be, it would have no overall material effect on the assessment of harm to the adjacent Green Belt land.
- 2.29 The factors affecting the impact of release on adjacent Green Belt land provided in table 3.5 do not take account of mitigation which we consider can limit the effect on harm to the adjacent Green Belt land.

#### **Step 6: Defining variations in harm to the Green Belt purposes**

- 2.30 Again, we disagree with the assumption made in paragraph 3.129:
- "It is recognised that specific areas of Green Belt land promoted for release and development will frequently not coincide with the boundaries of parcels defined in this study, but the harm rating given to a parcel or sub-area of it should be assumed to apply to any strategic scale release of land within that area." (emphasis added)*

- 2.31 As above, this implies that releasing part of a parcel to develop, for example five new dwellings, will have the same effect on harm as releasing the entire parcel. It equally takes no account of mitigation measures that we consider would limit the amount of harm on the remaining Green Belt land.
- 2.32 In LUC's methodology for the overall assessment of harm they state that the examples given in table 3.6 are to be used only to inform the assessment. However, in their methodology they state that if professional judgement is used then a clear and detailed justification on how a judgement was reached will be provided in the assessment of parcels. There are examples where the overall harm given to a parcel by LUC does not match the examples/criteria provided in table 3.6 and equally where no details are provided to justify their judgement.

### 3.0 Stage 2 – Review of the LUC Green Belt assessment for land east of Hardwick

#### Introduction

- 3.1 The land pursuant to this study is indicted on figure 1, Hardwick site location plan. Figure 2 indicates the same site boundary overlaid on the LUC parcels for this area of Hardwick.
- 3.2 The LUC assessment for the parcels relating to the Hardwick site are included in appendix A. As can be seen from figure 2 the LUC parcels of relevance are parcels HA4 and HA5. A very small section of parcel HA8 also crosses the south eastern corner of the Hardwick site due to the way the parcels ignore existing field boundaries. Figure 3 indicates the plateau area of the Hardwick site and the sloping area that forms part of the Gault Clay Ridge.
- 3.3 We will first provide a general overview of the LUC assessment of these parcels and attempt to review why the parcel boundaries are as defined. We will then provide a commentary on their assessment scores for these parcels in relation to the Hardwick site boundary.

#### Overview of the Hardwick site Green Belt assessment

- 3.4 Table 3.1 below indicates the assessment for parcels HA4, HA5 and HA8.

Green Belt Purposes	Parcel HA4	Parcel HA5	Parcel HA8
Openness	Mostly open	Open	Open
Distinction	Strong distinction between parcel and inset village	Moderate distinction between parcel and inset village	Strong distinction between parcel and inset village
Cambridge Purpose 1	No contribution	No contribution	No contribution
Cambridge Purpose 2	Moderate contribution	Relatively limited contribution	Moderate contribution
Cambridge Purpose 3	Relatively significant contribution	Relatively limited contribution	Relatively significant contribution
Impact on adjacent Green Belt Land	Minor-Moderate	Minor	Minor-Moderate
Overall harm of Green Belt release	High	Moderate	High

Table 3.1, Hardwick LUC Green Belt assessment

- 3.5 As can be seen from figure 2, most of the Hardwick site is in parcel HA4 which is assessed as providing a moderate contribution for purpose 2 and a relatively significant contribution for purpose 3, unlike parcel HA5 that provides a relatively limited contribution to both purposes. HA4 is also assessed as having a minor-moderate impact on the adjacent Green Belt land causing high harm if released. Whereas parcel HA5 has only a minor impact on adjacent Green Belt land and would create moderate harm if released.

#### Parcel definition

- 3.6 One of the criticisms with the LUC assessment is that no information is provided in the assessment of the individual parcels that explains how the parcel

boundaries are defined. The hedgerow line has been used to define parcel HA5. Woodland and hedgerows define the western, southern and eastern boundaries of parcel HA8. With parcel HA4, St Neots Road has been used for the northern boundary and the same hedgerow as parcel HA8 for its eastern boundary.

- 3.7 As can be seen in table 3.1 above, HA4 and HA8 contribute the same with regards to the Green Belt purposes and in their impact on adjacent Green Belt land and their harm if released. From the limited text provided, we can only assume the difference between these two parcels is that HA4 has some urbanising visual influence and that the reason for the diagonal split across open farmland between the two parcels is related to topography. We consider the boundary between the two should have followed the Bin Brook and the riparian tree and scrub planting that exists along its edges.

### **Parcel definition in relation to the Hardwick site and openness**

- 3.8 The settlement of Hardwick is located on an elevated plateau. This plateau extends east of Cambridge Road and covers all but the south eastern corner of the Hardwick site. We consider that this differentiates this part of parcel HA4 from the remaining area that slopes towards the east.
- 3.9 For this reason, we feel that HA4 or a sub-area of it, which we have named HA4-A, should have followed the plateau area. This sub-area would include the majority of the Hardwick site and most of the line of residential dwellings along St Neots Road.
- 3.10 This leaves a small sloping south eastern corner of the Hardwick site within parcel HA4. For completeness we consider this area should be another sub-area, called HA4-B. While it forms part of the sloping area of HA4 it is enclosed on the west by the hedgerow and tree planting that forms the boundary to parcel HA5. To the south it has the riparian vegetation along with Bin Brook that physically separates it from parcel HA8 and on its eastern boundary it has a moderately strong hedgerow with isolated trees. See figure 3. This boundary definition is more in line with the NPPF as discussed earlier in paragraphs 2.10.
- 3.11 If assessed as smaller parts of HA4 we consider they both contribute differently to the purposes of the Cambridge Green Belt than as assessed as part of the whole parcel by LUC. This is considered in greater detail in later sections. See figure 3.
- 3.12 Regarding openness, all parcels on and around the Hardwick site are considered as open as the only criterion used by LUC to assess openness is its lack of inappropriate development. The assessment does remark on the area of '*low openness*' that is attributed to the line of residential development along St Neots Road. However, rather than assessing this as an urbanising influence it is, we assume, included as: "*Low density or small-scale rural settlement*", which in paragraph 3.42 is one of the forms of development within the Green Belt that doesn't affect openness.
- 3.13 Each parcel has a description of the parcel location and what appears as its assessment on openness. However, this is not the case. All parcels assessed within Green Belt land are likely to be without inappropriate development and therefore to be regarded as open. LUC have considered only the spatial (physical)

dimension of openness and not the visual aspect. Instead, the visual aspect is used in the assessment of distinctiveness and is therefore somewhat lost.

### **Distinction between parcel and inset area**

- 3.14 The assessment of distinction for parcel HA4 describes the urbanising visual influence from the existing development along Cambridge Road and the hedgerow along it that LUC assess as being a moderate boundary feature. It then describes the landform that slopes down to the east from the elevated plateau of Hardwick as providing an additional distinction from Hardwick. It is assessed as having a strong distinction between the parcel and Hardwick.
- 3.15 However, in assessing parcel HA5 it is described as being in close proximity to Hardwick, with the garden boundaries to properties within Kesters Close creating little separation. As such, these create an urbanising visual influence. Overall, the parcel is assessed as having moderate distinction.
- 3.16 As stated above in paragraph 3.9, we feel that the majority of the Hardwick site, (HA4-A), located within parcel HA4, is a continuation of the Hardwick plateau. While we agree the east facing slopes provide a distinction between the parcel and Hardwick the plateau area does not.
- 3.17 Equally, we do not see how the urbanising influence of properties along the Cambridge Road can culminate in a parcel being assessed as being moderately distinct for parcel HA5 and not for the plateau area, HA4-A. The same moderate boundary feature along the Cambridge Road separates the urban edge of Hardwick from these parcels and unlike the rear gardens from Kesters Close, the plateau area of HA4-A has the rear garden boundary of number 122 Cambridge Road and the audible traffic noise from the A428. It also has the residential properties and rear garden boundaries from the north western edge of the line of properties off St Neots Road. We do not agree that these are low density, or a small-scale rural settlement as stated in paragraph 3.41 of the LUC methodology. They are clearly an isolated dense line of urban extension to Hardwick.
- 3.18 We therefore consider that the plateau area HA4-A, that forms the majority of the Hardwick site, should equally, as for parcel HA5, be assessed as being of moderate distinction from Hardwick. See figure 3.
- 3.19 While the slopes within parcel HA4 do provide some distinction from Hardwick the urbanising influence of properties along the Cambridge Road and St Neots Road, along with the audible traffic noise from the A428 means that, like HA4-A, the area of the Hardwick site within HA4-B is also considered as having a moderate distinction from Hardwick. This sub-area of parcel HA4 is enclosed on its south, eastern and western boundaries, that visually separate it from the remainder of parcel HA4. The further eastward you move from the western edge of Hardwick, the lower the land falls from the plateau area until the residential dwellings along the Cambridge Road and most of the properties along St Neots Road are no longer visible. At this point there are fewer urbanising elements and the land has a stronger distinction from Hardwick.

## **Contribution to the Green Belt purposes**

### ***Purpose 1 – preserving the unique character of Cambridge as a compact city***

- 3.20 In regards to this Green Belt purpose the parcels on and around the Hardwick site are not close enough to the main urban area of Cambridge and therefore make no contribution to this purpose. We therefore agree with LUC that the Hardwick site does not contribute to Cambridge Green Belt purpose 1.

### ***Purpose 2 – to maintain and enhance the quality of Cambridge’s setting***

- 3.21 The contribution to purpose 2 of parcel HA4 is assessed by LUC as being moderate. However, this is because it is described as open farmland with a strong distinction from the edge of Hardwick and a strong rural character. It also forms part of the gault clay ridge, a topographical feature that allows an appreciation of the wider topographic framework of the city.
- 3.22 Parcel HA5 provides a relatively limited contribution as it was assessed as having a moderate distinction from the edge of Hardwick, meaning it has some relationship with Hardwick although it is open farmland with some rural character.
- 3.23 As stated above, if we look only at the plateau area of the Hardwick site, area HA4-A and the sloping south eastern corner of area HA4-B, we consider that these two areas provide only a moderate distinction from the edge of Hardwick rather than a strong distinction, in the same way that parcel HA5 is assessed.
- 3.24 The open farmland forming the plateau and this area of the slope has some urbanising influences from the edge of Hardwick and along St Neots Road along with the traffic noise from the A425 and therefore we cannot agree that it can be assessed as having a strong rural character.
- 3.25 Using the points raised above and using the LUC criteria provided in table 3.3 for this purpose, areas HA4-A and HA4-B fall most closely into the following criteria:

*“Land use is not associated with an inset settlement, land is open and does not have a strong distinction from an inset settlement, and therefore has some rural character, it may also form/contain limited features/aspects that contribute to the quality of Cambridge’s setting”*

- 3.26 In taking these points into account we therefore conclude that the Hardwick site within parcel HA4 makes a relatively limited contribution to purpose 2.

### ***Purpose 3 – to prevent communities in the environs of Cambridge from merging into one another and with the city***

- 3.27 Parcel HA4 is assessed as being in a moderate gap between Hardwick and Coton and Madingley, which with the sloping landform and tree belts retains separation. Because it is assessed as having a strong distinction with Hardwick it is felt this increases the extent to which development would be perceived as narrowing the gap. Therefore, the parcel is assessed as making a relatively significant contribution to purpose 3.

- 3.28 We fundamentally disagree with the criteria used by LUC to identify the grade of gap each parcel is given. We do not agree that the gap should be considered as moderate or that development of the Hardwick site would narrow the perceived gap or that this gap creates relatively significantly contribution. There is 5km distance from the western edge of Cambridge and approximately 2 to 2.5km from the nearest villages of Coton, Comberton and Madingley. These gaps should be considered as wide.
- 3.29 Parcel HA5 is assessed as being within a wide gap between Hardwick and Coton, with significant separating features including sloping ground levels and tree belts. The parcel has some relationship with Hardwick and a degree of distinction from it. This parcel is assessed as providing a relatively limited contribution to purpose 3.
- 3.30 The assessment of purpose 3 is a typical example of where the criteria provided are too complex and rather than just having to use the criteria within table 3.4 you need to also look at the criteria from paragraphs 3.31-3.35 to understand what sort of gap the settlement is located in. For example, a very fragile gap, moderate or wide gap.
- 3.31 If we look only at the Hardwick site area, we consider HA4-A and HA4-B should be seen as being located in a robust/wide gap like parcel HA5 directly to the south. Equally, in accounting for the urbanising influences created from the visible residential edge of Hardwick and the residential development along St Neots Road and the traffic noise from the A428, then these sub-areas of HA4 should be assessed as having a moderate distinction from Hardwick. In view of this we consider that areas HA4-A and HA4-B fall most closely into the following criteria provided by LUC in their table 3.4 for the assessment of this purpose, which states:

*“Land is open and lies in a robust gap between settlements. It has moderate distinction from the inset settlement edge”*

- 3.32 They should both therefore be assessed as providing a relatively limited contribution to purpose 3.

#### **Parcel HA8**

- 3.33 While we appreciate that a very small south eastern corner of the Hardwick site is located within parcel HA8 as indicated on figure 2 we have not reassessed this area as a distinct parcel as we do not agree that this corner of the Hardwick site is any different than parcel HA4. It was assessed as equal to its contributions to the Green Belt and harm if released as parcel HA4. However, this small section of HA8 lies to the north of the riparian woodland belt adjacent to Bin Brook and the tree lined section of hedgerow that forms the Hardwick site’s eastern boundary. For these reasons we feel it is more sensible to attribute this section to HA4.
- 3.34 Furthermore, we feel that the separation between parcel HA4 and HA8 should more sensibly have followed the line of the Bin Brook. In this way, rather than having a diagonal division between parcels running across open farmland, that doesn’t even follow the ridge line, the brook would have been used to divide them, with the south eastern slopes of the gault clay ridge located in parcel HA4 and north eastern slopes within parcel HA8. See figure 4.

***Impact on contribution of adjacent Green Belt***

- 3.35 The LUC assessment has concluded that impact of the release of HA4 on adjacent Green Belt land is assessed as minor-moderate, while for HA5 it would have only a minor impact. In the assessment of HA4 it is stated that development of the land would significantly weaken the strong boundary distinction. However, in the assessment of distinction the boundary features were assessed as moderate not strong.
- 3.36 In the LUC assessment for parcel HA4 the release of land is stated to weaken the moderate settlement gap between Hardwick and Madingley. However, as stated above, if sub-areas HA4-A and HA4-B are reviewed in isolation then the gap should be assessed as wide in the same way as it is for HA5. Furthermore, we do not agree that the gap between Hardwick and Madingley, whether wide or moderate, would be weakened by development of the Hardwick site. Topography, intervening vegetation and the A428 mean there would be no perceived narrowing of the gap. This is without taking account of the significant opportunity to strengthen the existing landscape structure through the enhancement measures outlined below.
- 3.37 The LUC assessment on the impact of the release of land on the adjacent Green Belt land does not take account of mitigation which we consider would limit the impact of harm.

***Overall harm of Green Belt release***

- 3.38 Parcel HA4 was assessed by LUC as creating high harm if released while HA5 was assessed as creating moderate harm. Again, if we look only at the Hardwick site area within HA4 then the Hardwick site only provides a relatively limited contribution to Green Belt purposes 2 and 3. Using the criteria set out in table 3.6 of the LUC methodology the Hardwick site would therefore now create only moderate harm if released as it would sit within the following criterion of table 3.6 which states:

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

***Summary of assessment for the Hardwick site***

- 3.39 Table 3.2 below indicates the re-assessment for parcels HA4 if we look only at the area of the Hardwick site located within HA4 rather than the parcel as a whole.

Table 3.2, Re-assessment of the Hardwick site

Green Belt Purposes	LUC assessment of Parcel HA4	TOR assessment of the Hardwick site within Parcel HA4	LUC assessment of Parcel HA5
Openness	Mostly open	Mostly open	Open
Distinction	Strong distinction between parcel and inset village	Moderate distinction between parcel and inset village	Moderate distinction between parcel and inset village
Cambridge Purpose 1	No contribution	No contribution	No contribution
Cambridge Purpose 2	Moderate contribution	Relatively limited contribution	Relatively limited contribution

Cambridge Purpose 3	Relatively significant contribution	Relatively limited contribution	Relatively limited contribution
Impact on adjacent Green Belt Land	Minor-Moderate	Minor-Moderate	Minor
Overall harm of Green Belt release	High	Moderate	Moderate

## 4.0 Stage 3 – Conclusion in relation to the preliminary Green Belt assessment

### Review of preliminary Green Belt assessment

- 4.1 In this section of the report, we will review our preliminary Green Belt assessment work carried out as part of the representations for the Call for Sites in March 2019 in light of the new LUC assessment.
- 4.2 In our original Green Belt assessment representations, we used the NPPF Green Belt purposes and then looked at how the Hardwick site contributed using the Cambridge Green Belt purposes.

### *NPPF Green Belt purposes*

- 4.3 Looking first at the contribution of the Hardwick site in terms of the NPPF Green Belt purposes, we considered that it did not contribute towards the purpose of sprawl, purpose 1.
- 4.4 We considered that at a 5km distance from the western edge of Cambridge and approximately 2 to 2.5km from the nearest villages of Coton, Comberton and Madingley, that development of the Hardwick site would not create coalescence with these settlements. (NPPF purpose 2 – Merging)
- 4.5 With regards to NPPF purpose 3 – Encroachment, we accepted that all new development around cities, towns and villages creates encroachment into the countryside. However, it was how this development is perceived within the landscape that we considered was important when assessing this purpose. A combination of existing vegetation and the landscape-led concept masterplan for the Hardwick site provides ample opportunity for mitigation measures that will assist in screening development and the perception of encroachment. This is reviewed in further detail in the following paragraphs.
- 4.6 In terms of NPPF purpose 4 – Historic setting, this purpose relates to historic towns and cities and it was felt development of the Hardwick site would have no effect on the setting or special character of Cambridge.
- 4.7 What is common in almost all Green Belt assessments is that NPPF purpose 5 – assisting regeneration, is almost always discounted on the grounds that the amount of land within an urban area that could be developed will already have been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against purpose 5 will not enable a distinction to be made between land parcels as all Green Belt achieves this purpose to the same extent.

### *Cambridge Green Belt purposes*

- 4.8 In our original representation we considered that development of the Hardwick site would not affect the unique character of Cambridge as a compact city, Cambridge Green Belt purpose 1. We considered it would not affect the quality of its setting, Cambridge Green Belt purpose 2 and would not cause communities in the environs of Cambridge to merge with each other and the city, Cambridge Green Belt purpose 3.

- 4.9 Equally, in relation to the special character of Cambridge, development at the Hardwick sit would not affect key views toward Cambridge from the surrounding countryside. Hardwick village is 5km from Cambridge and at this distance it is unlikely that the majority of the city will be discernible.
- 4.10 Development of the Hardwick site would not affect the soft green edge and would not affect the physical separation, setting, scale and character of the Green Belt villages. Finally, we concluded that removing parcels HA5, HA4-A and or HA4-B from the edge of the Cambridge Green Belt would have no effect on the rural character of Green Belt surrounding Cambridge.

**Review of original findings in respect to the LUC Green Belt assessment**

- 4.11 Table 3.3 below indicates how the Cambridge Green Belt purposes relate to the NPPF purposes and how we considered that the Hardwick site contributed to these purposes, looking firstly at our preliminary evaluation and then using the new LUC Green Belt assessment methodology criteria, looking only at the area of the Hardwick site located within HA4 rather than the parcel as a whole.

Cambridge purpose	NPPF purpose	Preliminary Green Belt assessment	TOR assessment of the Hardwick site within LUC parcel HA4
1. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre	1. To check the unrestricted sprawl of large built-up areas.	No contribution	No contribution
2. Maintain and enhance the quality of its setting.	3. To assist in the safeguarding of the countryside from encroachment. 4. To preserve the setting and special character of historic towns.	Limited to no contribution	Relatively limited contribution
3. Prevent communities in the environs of Cambridge from merging into one another and with the city.	2. To prevent neighbouring towns merging into one another.	Limited to no contribution	Relatively limited contribution

Table 3.3, Assessment of original findings in relation to new LUC assessment

- 4.12 As can be seen from table 3.3, our original assessment of the contribution made by the land parcel forming the Hardwick site has not really altered when using the new LUC assessment methodology criteria. The Hardwick site may have some rural character, but it also has urbanising influences from the eastern edge of Hardwick and the residential properties along St Neots Road as well as the audible traffic noise from the A428. It therefore has only a moderate distinction from Hardwick and provides only a relatively limited contribution to purpose 2
- 4.13 Equally, we consider the Hardwick site lies in a robust / wide gap between neighbouring villages. In only developing the plateau area and avoiding development of the sloping south eastern section of the Hardwick site the

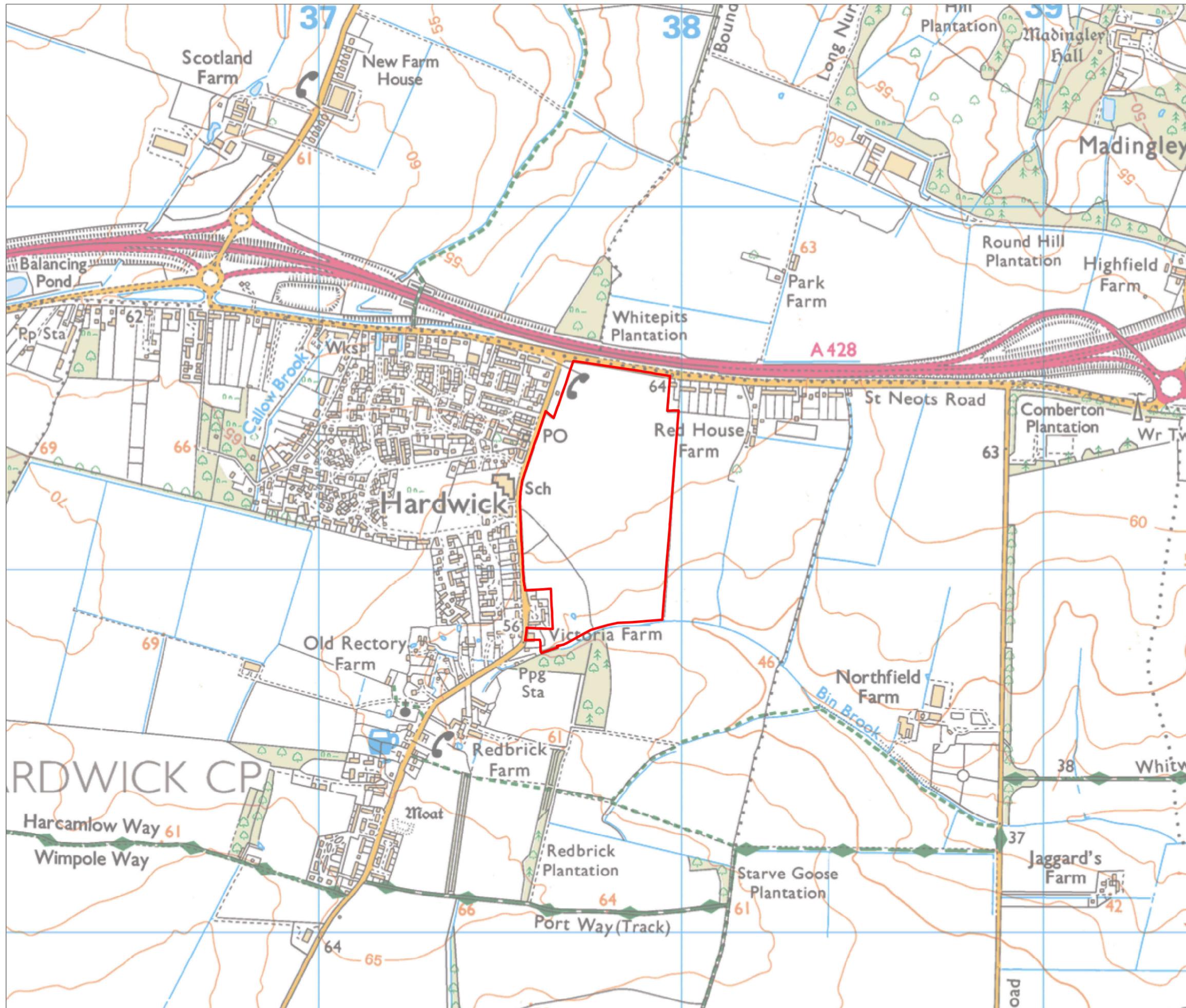
development would not be perceived as narrowing the gap and thus, provides only a relatively limited contribution to purpose 3.

## **Conclusions**

- 4.14 The original village of Hardwick, now protected as a conservation area, is located to the south west of the Hardwick site. Since the 1960's Hardwick has expanded incrementally and more than doubled in size in the 1970's when Limes Estate was built. This growth has focused to the north and north west of the historic core creating unbalanced growth and the loss of the nucleated form of the historic settlement.
- 4.15 Development of the Hardwick site will redress this balance. The village's primary school is located on the settlement's edge as are its sports fields. Local amenities, as a result, are limited and also located around the periphery of the village (along Cambridge Road and St Neots Road). Hardwick has an overall deficit of open space.
- 4.16 Retail units are also dispersed over a large area rather than within a centralised and concentrated hub, meaning that the village currently lacks a unified heart.
- 4.17 The Hardwick site is uniquely located to assist in restoring the village core with the creation of a new local centre containing retail, employment space, community centre and health care facilities. It also has the ability to integrate the isolated line of residential development along St Neots Road into the village.
- 4.18 In terms of visual openness of the Hardwick site, the local pattern of topography, vegetation and development limits the extent to which development of the Hardwick site would be visible in the landscape, and where views are possible they would be largely restricted to locations within 1km of the Hardwick site boundary. Although a small number of views are available from the wider landscape, it was determined that, where they occur, the pattern of landform and landscape structure, or viewing distance itself, significantly reduces the degree of visual effect.
- 4.19 In their assessment of parcel HA4, LUC made a great deal of the fact that the parcel forms part of the gault clay ridge which is described as a key topographical feature that allows an appreciation of the wider topographic framework of the city. They also note that the eastern slopes from the elevated plateau of Hardwick provide distinction from the village.
- 4.20 Inter-visibility with the Hardwick site is limited to two adjacent public roads / residential streets and a small number of locations on three public rights of way directly to the south of the Hardwick site, within 0.8km of the boundary. The Hardwick site has a broad and gentle south westerly aspect, falling more steeply towards the southern boundary. We understand that it is this slope that is most exposed to views from these locations.
- 4.21 In preparing the concept masterplan, figure 5, we have taken due consideration of this landform by excluding development from this area. We have also indicated wide areas of native woodland structure planting along these slopes to the north of Bin Brook and continued this wide woodland belt along the Hardwick site's eastern boundary, again widening to the rear of the properties along St Neots

Road. The remaining sloping part of the Hardwick site provides new areas for open space and the location for attenuation basins. Actual built development is located on the plateau, level with the rest of Hardwick.

- 4.22 The Hardwick site's contribution to both Cambridge Green Belt purposes 2 and 3 is relatively limited. While the LUC assessment considers that the impact on the adjacent Green Belt land will not be reduced through mitigation and that development of parcel HA4 would weaken the moderate gap, we disagree that the gap is moderate when looking only at land within the Hardwick site boundary. Furthermore, we disagree that the mitigation described above would not have the effect to reduce this impact, especially, once established.
- 4.23 LUC assessed the overall harm of releasing parcel HA4 from Green Belt as creating high harm. However, in using the LUC criteria to re-assess the harm the Hardwick site would create if released from Green Belt then we consider it falls within the moderate harm category, two levels of harm lower than LUC's assessment for the whole of parcel HA4. Again, we feel that in creating a new woodland edge as indicated on figure 5, that could become a new strong defensible Green Belt boundary, that this mitigation would assist in reducing the harm further should the Hardwick site be released from Green Belt.
- 4.24 In conclusion, the Hardwick site does not contribute to the Cambridge Green Belt purpose 1 and provides only a relatively limited contribution for Cambridge Green Belt purposes 2 and 3. It will have only a minor-moderate impact on adjacent Green Belt if released and would create only moderate overall harm if released. However, this moderate harm would be further reduced by the considerable mitigation measures being proposed as indicated on figure 5.



Hardwick site boundary

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**Figure 1: Hardwick site location**

Dwg no/239105/L01	Revision
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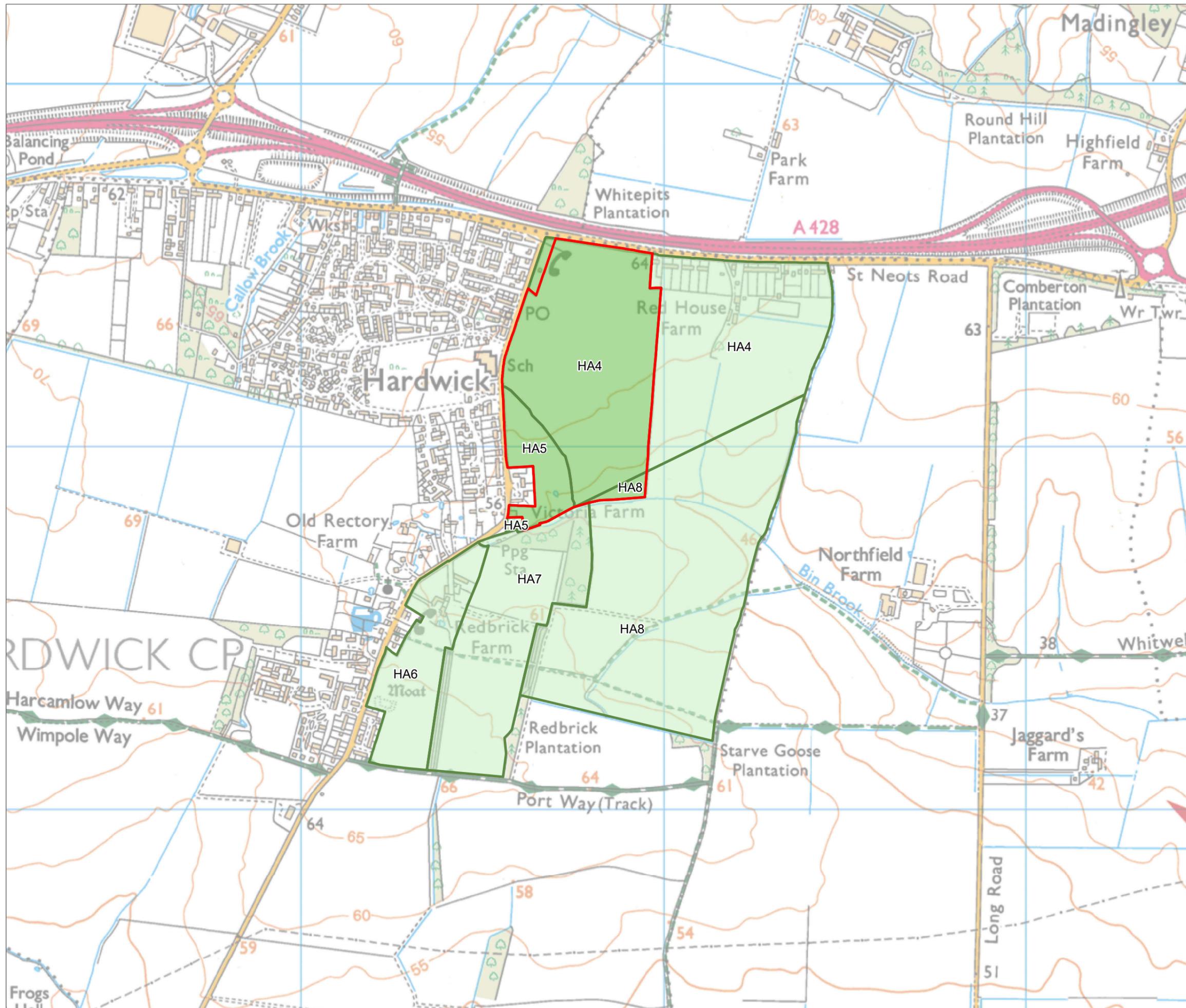
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- Hardwick site boundary
- LUC Green Belt parcels covering part/all of the site
- LUC Green Belt parcels around the site

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**Figure 2, LUC Green Belt parcels in relation to the Hardwick site**

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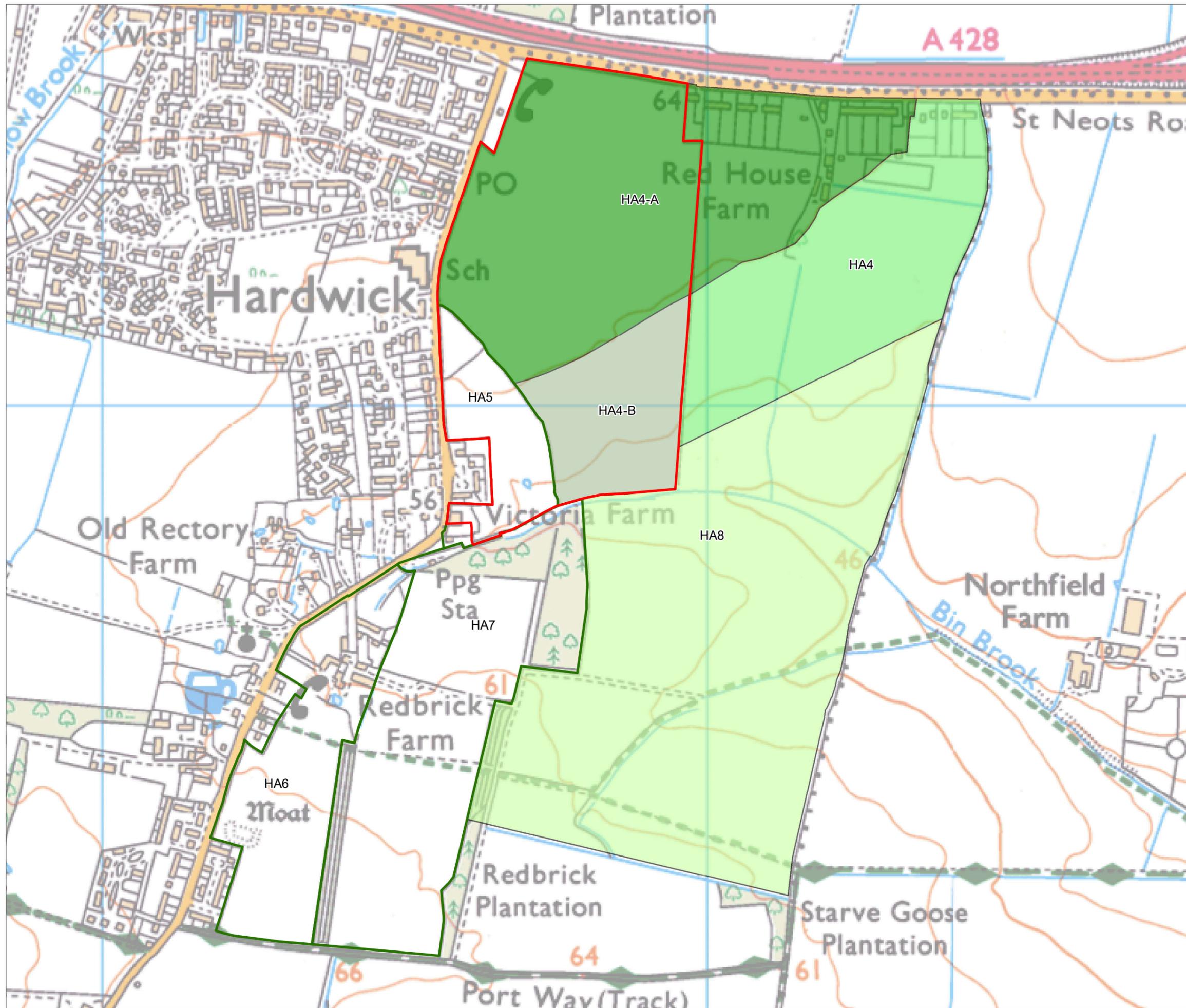
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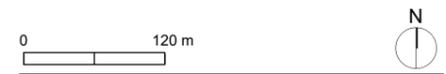
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- Hardwick site boundary
- Plateau area - HA4-A
- Slope area within the Hardwick site - HA4-B
- HA4
- HA8

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**Figure 3: Parcel definition of HA4**

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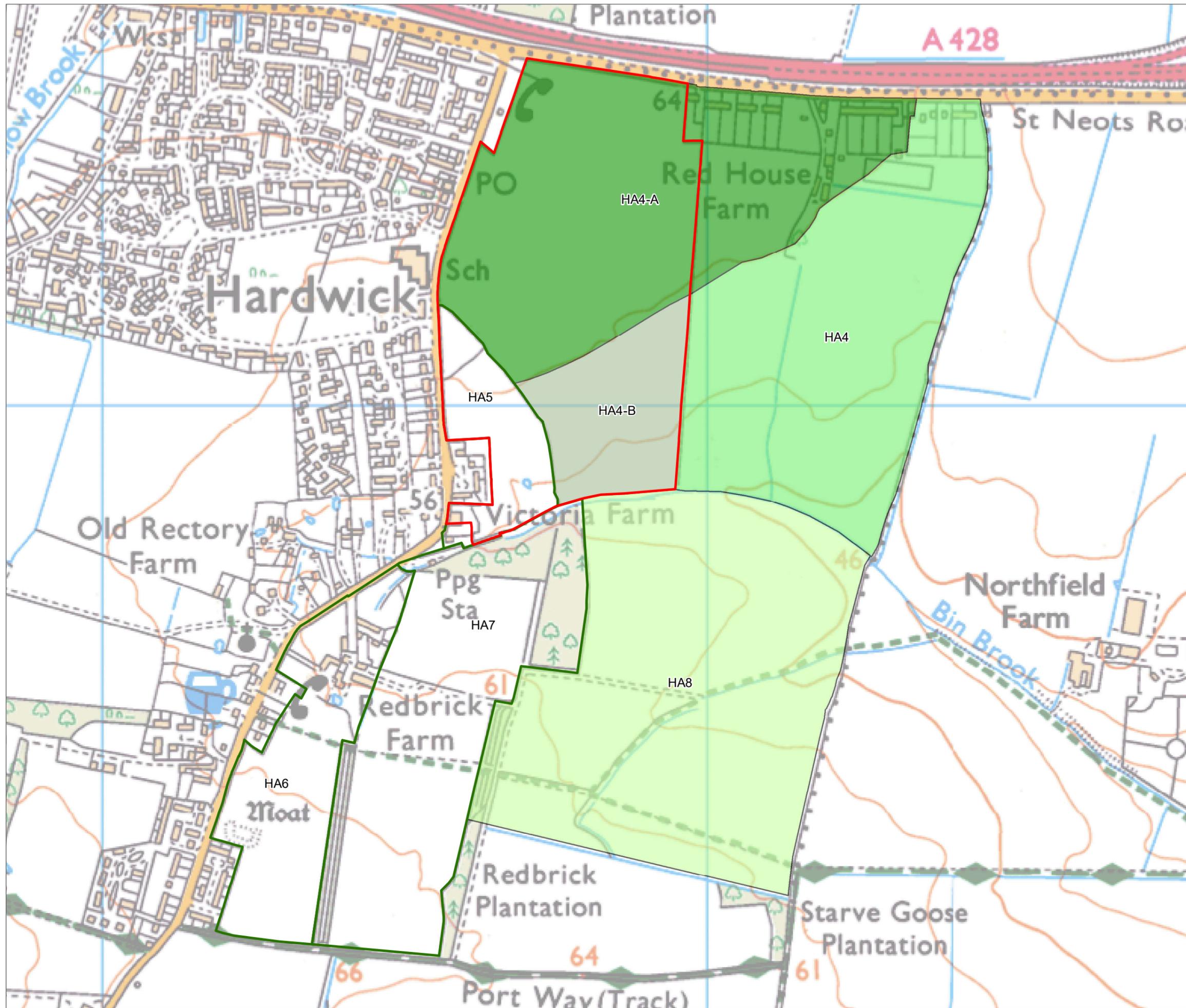
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- Hardwick site boundary
- Plateau area - HA4-A
- Slope area within the Hardwick site - HA4-B
- HA4 with revised southern boundary
- HA8 with revised northern boundary

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**Figure 4: Revised parcel definition of HA4 & HA8**

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**Figure 5: Hardwick Framework Masterplan**

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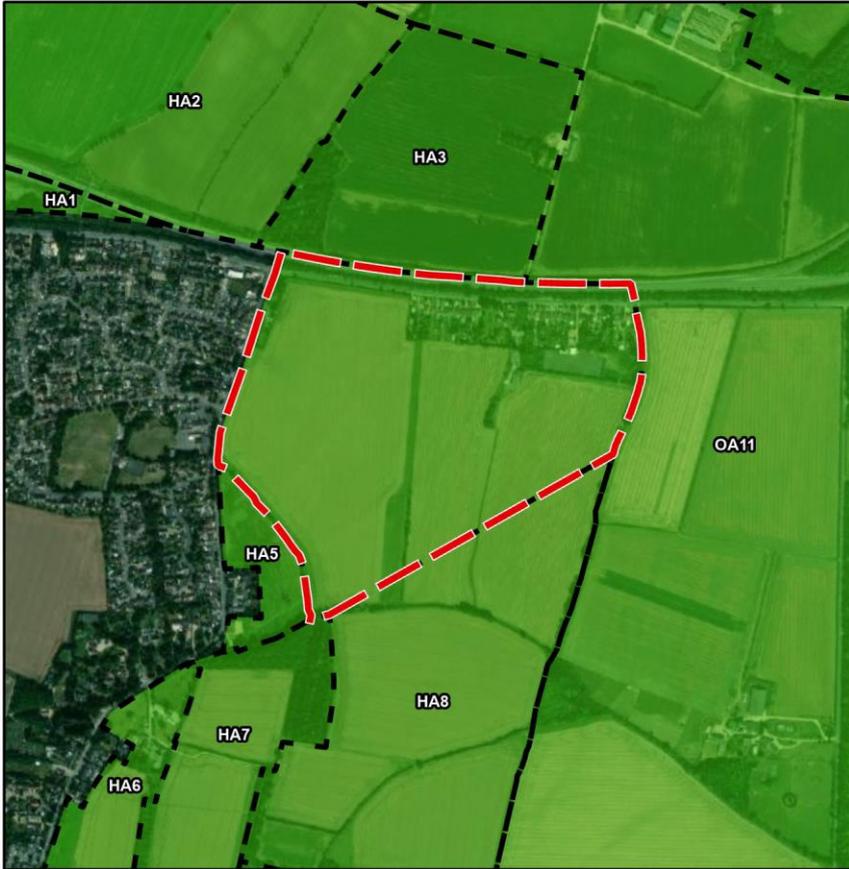
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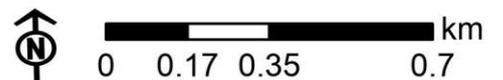
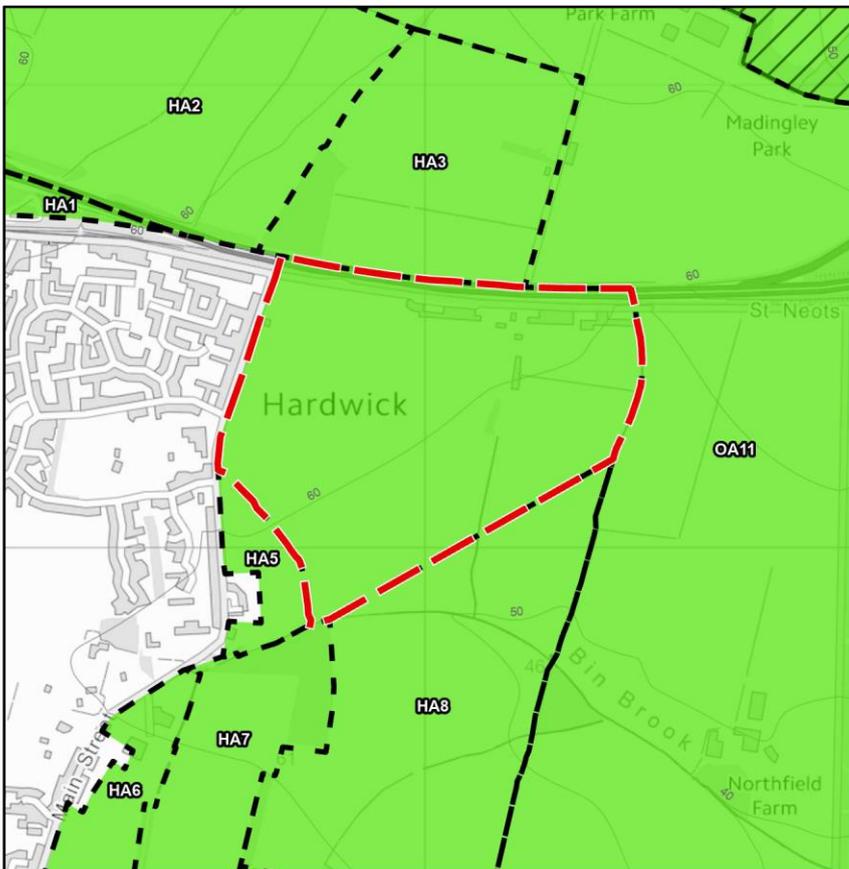
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# HA4



-  HA4
-  Neighbouring parcel
-  Green Belt
-  Registered park & garden



# HA4

## Parcel location and openness

Parcel size: 47.11ha

The parcel is located to the northeast of Hardwick and is dominated by agricultural fields. An area of residential development is located to the northeast on St Neots Road which, along with the A428, forms the northern edge of the parcel.

Land is mostly open, with an area of low openness development to the northeast.

## Distinction between parcel and inset area

Land is not contained by inset development and extends a significant distance to the east from the inset area. Although there is some urbanising visual influence from existing development within the northeast of the parcel, Cambridge Road and the associated vegetation to the west is a moderate boundary feature between the parcel and Hardwick. The landform within the parcel slopes down to the east from the elevated plateau of Hardwick, providing some additional distinction from Hardwick. Overall, there is strong distinction between the parcel and the inset area.

# HA4

## 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: 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 Hardwick. It therefore makes no contribution to Cambridge Purpose 1.

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

Contribution: Moderate

The parcel comprises open farmland that has a strong distinction from the edge of Hardwick, meaning it has a strong rural character. The parcel also forms part of a gault clay ridge, a key topographical feature that lies to the west of Cambridge, and therefore allows an appreciation of the wider topographical framework of the city. 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: Relatively significant

Land is mostly open, with an area of low openness development to the northeast. It lies in a moderate gap between Hardwick and Coton, and between Hardwick and Madingley, but features including differences in ground elevation and tree belts retain separation. 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 significant contribution to Cambridge Purpose 3.

# HA4

## Impact on contribution of adjacent Green Belt

- Release of land as an expansion of Hardwick:

Rating: Minor-moderate

The release and development of land within this parcel would significantly weaken the strong boundary distinction and increase urbanising visual impact on land to the east from the settlement.

The release would also weaken the moderate settlement gap between Hardwick and Madingley. However, the additional impact is limited due to tree belts and differences in ground elevation which retain separation.

The release would not have an impact on the contribution of land to the north to Green Belt purposes due to separation which is retained by the A428.

The adjoining land to the south and southwest does not make a stronger contribution to any of the Green Belt purposes. The impact on this land would not therefore increase overall harm.

## Overall harm of Green Belt release

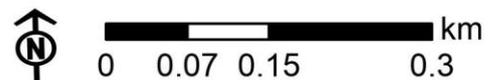
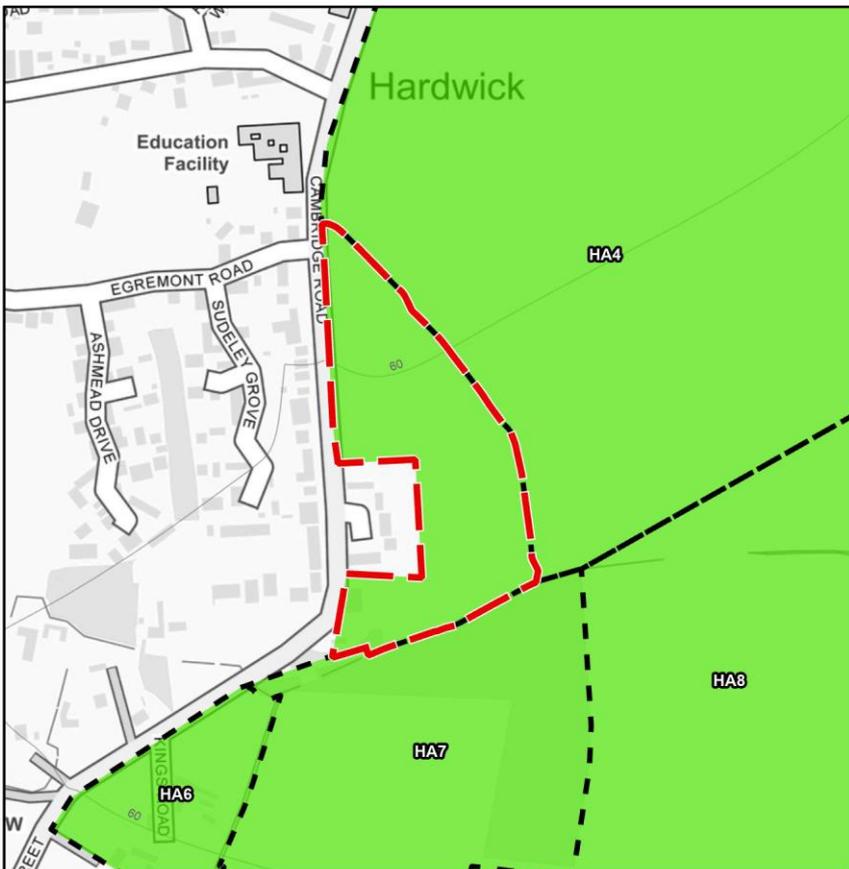
- Parcel HA4 makes a relatively significant contribution to preventing communities in the environs of Cambridge from merging with one another, and a moderate contribution to maintaining and enhancing the quality of Cambridge's setting. The additional impact on the adjacent Green Belt of the release of the parcel would be minor-moderate. Therefore, the harm resulting from its release, as an expansion of Hardwick, would be High.

**High**

# HA5



-  HA5
-  Neighbouring parcel
-  Green Belt



# HA5

## Parcel location and openness

Parcel size: 4.14ha

The parcel is located to the east of Hardwick and is comprised of a paddock field. Cambridge Road forms part of the western edge of the parcel.

Land is open. There is no development that has an impact on Green Belt openness.

## Distinction between parcel and inset area

Although the parcel is not contained by inset development, it is in close proximity to the inset area and the garden hedgerow boundary to the southeast creates little separation between the parcel and Hardwick. As such, there is some urbanising visual influence. The landform and land cover within the parcel do not create any additional distinction from Hardwick. Overall, there is moderate distinction between the parcel and the inset area.

# HA5

## 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: 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 Hardwick. It therefore makes no contribution to Cambridge Purpose 1.

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

Contribution: Relatively limited

Land has a moderate distinction from the edge of Hardwick, meaning it has some relationship with the inset area. However, it comprises open farmland and therefore has some rural character. Whilst it lies partly within Hardwick Conservation Area to the southwest it is separated from the more intact and historic parts of the village along High Street by modern more modern development. Overall the parcel makes a relatively 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:

Contribution: Relatively limited

Land is open and lies in a wide gap between Hardwick and Coton, with some significant separating features including differences in ground elevation and tree belts. The parcel has some relationship with the inset area, but also a degree of distinction from it. Overall, the parcel makes a relatively limited contribution to Cambridge Purpose 3.

# HA5

## Impact on contribution of adjacent Green Belt

- Release of land as an expansion of Hardwick:

Rating: Minor

The release and development of land within this parcel would breach Cambridge Road, which is largely unbreached, and therefore increase urbanising visual impact on land to the northeast from the settlement. However, the tree line to the northeast retains some boundary distinction. The release would not have an impact on the contribution of land to the south to Green Belt purposes due to separation which is retained by woodland.

## Overall harm of Green Belt release

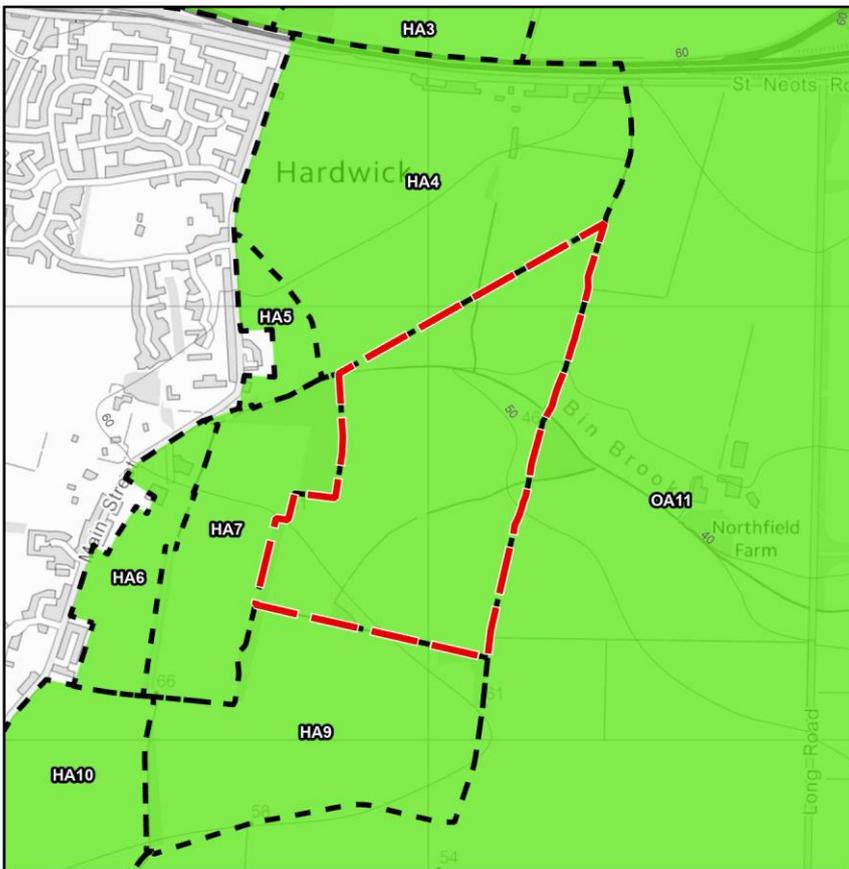
- Parcel HA5 makes a relatively limited contribution to maintaining and enhancing the quality of Cambridge's setting, and a relatively limited contribution to preventing communities in the environs of Cambridge from merging with one another. The additional impact on the adjacent Green Belt of the release of the parcel would be minor. Therefore, the harm resulting from its release, as an expansion of Hardwick, would be Moderate.

**Moderate**

# HA8



-  HA8
-  Neighbouring parcel
-  Green Belt



# HA8

## **Parcel location and openness**

Parcel size: 38.99ha

The parcel is located to the east of Hardwick and is dominated by agricultural land.

Land is open. There is no development that has an impact on Green Belt openness.

## **Distinction between parcel and inset area**

The parcel extends a significant distance from the inset area and is not contained by inset development. The tree belts and woodland to the west are a strong boundary feature creating separation between the parcel and Hardwick and so there is no urbanising visual influence. The landform within the parcel provides some additional distinction from Hardwick. Overall, there is strong distinction between the parcel and the inset area.

# HA8

## 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: 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 Hardwick. It therefore makes no contribution to Cambridge Purpose 1.

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

Contribution: Moderate

The parcel comprises open farmland that has a very strong distinction from the edge of Hardwick, meaning it has a strong rural character. It also forms part of a gault clay ridge, a key topographical feature that lies to the west of Cambridge, and therefore allows an appreciation of the wider topographical framework of the city. 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: Relatively significant

Land is open and lies in a wide gap between Hardwick and Coton, with some significant separating features including differences in ground elevation and tree cover. 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 significant contribution to Cambridge Purpose 3.

# HA8

## Impact on contribution of adjacent Green Belt

- Release of land as an expansion of Hardwick:

Rating: Minor-moderate

The release and development of land within this parcel would significantly weaken the strong boundary distinction and increase urbanising visual impact on land to the east from the settlement and would reduce the landform distinction of this lower ground due to the release of part of the southward slope.

The release would also reduce the wide settlement gap between Hardwick and Coton and would release part of the downward slope towards lower ground which forms part of a key separating feature between the two settlements.

The release would not have an impact on the contribution of land to the south to Green Belt purposes.

The adjoining land to the north and southwest does not make a stronger contribution to any of the Green Belt purposes. The impact on this land would not therefore increase overall harm.

## Overall harm of Green Belt release

- Parcel HA8 makes a relatively significant contribution to preventing communities in the environs of Cambridge from merging with one another, and a moderate 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 minor-moderate. Therefore, the harm resulting from its release, as an expansion of Hardwick, would be High.

**High**