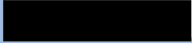


**CAMBRIDGE SCIENCE PARK NORTH**  
**Green Belt Study Review**

for



Planning | 9<sup>th</sup> December 2021

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## Contents

1	Introduction	1
2	HELLA Review	2
3	Greater Cambridge Green Belt Study	5
4	Assessment of Parcels	9
5	Mitigation, Beneficial Use and Enhancements	12

# 1 Introduction

## 1.1 Overview

- 1.1.1 The report has been prepared on behalf of [REDACTED] by The Landscape Partnership (TLP) to review and provide advice on the Greater Cambridge Green Belt Study (GCGBS) authored by LUC and published in August 2021, as part of the evidence base for the emerging Greater Cambridge Local Plan. The report also provides a review of the Housing and Economic Land Availability Assessment (HELAA), September 2021. The review is considered in relation to the site of the proposed Cambridge Science Park North (CSPN), hereafter referred to as the 'Site', which was submitted as a Call for Site (HELAA Site ref: 40096).
- 1.1.2 The Greater Cambridge Local Plan is a joint Local Plan for Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC) and will cover a plan period up to 2041. The Local Plan First Proposal is currently being consulted on. A number of evidence base documents have been prepared to support the emerging Local Plan. In addition to the Green Belt Study (which is the focus of this report) other related studies include: Greater Cambridge Landscape Character Assessment, February 2021; Strategic Spatial Options Assessment: Landscape & Townscape, November 2020; Greater Cambridge Green Infrastructure Opportunity Mapping (Baseline Report November 2020, and Recommendations August 2021); and Strategic Spatial Options Assessment: Green Infrastructure Opportunity Mapping, November 2020.
- 1.1.3 TLP previously prepared a Landscape and Green Belt Study in November 2019 which provided a strategic assessment of the landscape, visual and Green Belt aspects and considerations relating to the site of the proposed CSPN and provided guidance/considerations for future development. This included TLP's own assessment of the Green Belt based on the Cambridge Inner Green Belt Boundary Study (CIGBBS) 2015, including recommendations on how to minimise harm to the Green Belt.
- 1.1.4 This report provides a review of: the appropriateness and suitability of the GCGBS methodology; reference and comparison to the previous Green Belt Studies; review of parcels covering the Site; and mitigation, beneficial use and enhancements of the proposals, should the part of the Site identified for development be released from the Green Belt.

## 1.2 Previous Green Belt Studies

- 1.2.1 The Cambridge Sub-Region Study 2001 included a review of the Green Belt for Cambridgeshire and Peterborough Structure Plan. The Cambridge Inner Green Belt Study 2002 was prepared as in-house working document by Cambridge City Council and formed an evidence base document for the 2006 Cambridge Local Plan. The Cambridge Green Belt Study: A Vision for the Future of Cambridge and its Green Belt Setting was prepared for SCDC in 2002 by LDA and provided a more strategic assessment covering the broader Green Belt around Cambridge to that of the later 2015 CIGBBS. This identified a number of qualities that were considered to contribute positively to the setting and special character of Cambridge and were considered essential to the purposes of the Cambridge Green Belt. These were taken forward and used in the later Green Belt assessments. The Inner Green Belt Study 2012 was undertaken by CCC and SCDC provided an evidence base for the emerging Local Plans at that time for each authority. The Study followed a similar methodology

used for the Cambridge Inner Green Belt Study 2002. This methodology was brought into question by the inspectors examining the emerging Local Plans as they considered it difficult, in some cases, to understand how the importance to the Green Belt had been derived. In response the 2015 CIGBBS was prepared by LDA.

- 1.2.2 The CIGBBS provided an update of the previously prepared Inner Green Belt Boundary Study, December 2012. The Study was based on the purposes as defined for the Cambridge Green Belt as well as the Green Belt purposes set out in the National Planning Policy Framework (NPPF). The Study took a different approach to the previous studies and those typically applied in relation to other Local Planning Authority (LPA) Green Belt assessments by not using a ranking system but rather defining the 16 qualities of the Green Belt that contributed to the purposes of the Cambridge Green Belt. The 16 qualities incorporated the previous 14 qualities identified in the 2002 Green Belt Study prepared by LDA and added two further qualities. The CIGBBS focused on the assessment of the land closest to Cambridge (although included a number of figures covering the whole of the Cambridge Green Belt) and identified 19 sectors of the Inner Green Belt, which were assessed to understand their importance to the performance of the Green Belt purposes. Most of the sectors were also divided into sub-areas, where there were differences within the sector. The Site lies beyond the assessed sectors included in the CIGBBS and does not lie adjacent to any of assessed sectors. The Study Area covered nearly the entirety of the Green Belt surrounding Cambridge, with the exception of the Green Belt between Histon/Impington and Milton. The CIGBBS concluded that virtually all areas of land within the study area were assessed as being of importance to Green Belt purposes, although it identified that it may be possible for certain areas of land be released from the Green Belt for development without significant harm to Green Belt purposes.
- 1.2.3 The CIGBBS was found to be robust by the Inspectors examining the Local Plans and has continued to provide an important evidence base document for the adopted 2018 Local Plans for CCC and SCDC.

## 2 HELLA Review

- 2.1.1 The HELLA incorporates an assessment of potential sites for residential and economic development using a Red, Amber, Green (RAG) scoring system to assess a number of factors, including landscape and townscape; and open space / green infrastructure. The Site is one of the assessed sites in HELLA. The Site is assessed as Red for landscape and townscape, and Green for open space / green infrastructure. The criteria relating to the rating of Red for landscape and townscape is: *'development of the site would have a significant negative impact which cannot be mitigated'* (page 33). It is noted that many of the green field sites on the edge of settlements are given a rating of Red for landscape and townscape.
- 2.1.2 The methodology description of how each site is assessed in relation to impacts on landscape / townscape, refers to *'based on the constraints of the site, the scope of the intended proposals and/or expected unit numbers, it was considered whether the site was developable and if so, to what extent the landscape and existing townscape had been considered. For example, would there be enough room for adequate boundary buffering, would there be enough room for tree planting within the site, would the grain/density of the development fit in with surrounding development or*

*setting of the village, and would the surrounding designations be impacted by the development* (page 34).

- 2.1.3 The Site assessment of landscape and townscape refers to the National Character Area but refers to key features, habitats with internationally rare and scarce species which are not relevant to the Site. It is noted that a Tree Preservation Order (TPO) is present on the Site. The description of the local character does include reference to characteristics of relevance to the Site, in particular *'mostly flat, low-lying landscape with open views. However, scatterings of clumps of trees, poplar shelterbelts and occasional hedgerows sometimes merge together to give the sense of a more densely treed horizon'* (page 334). However, this has not been interpreted in the context of the Site features and characteristics, and how the proposed development would relate to these features and characteristics. The assessment goes on to advise *'development throughout the site would have a significant adverse impact to the wide and local landscape character views and visual amenity. It would be a significant encroachment in the landscape, permanent, removal of agricultural open fields and an urbanisation of rural countryside. Even with a reduction in development with landscape mitigation measures the harm would still adverse and unacceptable'* (page 334). This a general statement relating to the full extent of the Site and does not refer to any aspects of the proposed development, nor take adequate account of site landscape features and context.
- 2.1.4 The Site is not located in any landscape or visually related landscape designation or locally sensitive landscape, other than containing a TPO. It would be the proposals intention to retain and not effect the TPO. The Greater Cambridge Landscape Character Assessment (GCLCA), February 2021 identifies that the Site is located within the Landscape Character Type (LCT) 2 of the Fen Edge Claylands and within Landscape Character Area (LCA) 2B Cottenham Fen Edge Claylands. The GCLCA assesses the Landscape Condition, and Strength of Character of each LCT within Greater Cambridge, with LCT 2 being assessed as Moderate for both categories. Whilst moderately performing, it is nevertheless the weakest performing landscape condition and strength of character in Greater Cambridge, together with LCT 3, LCT6 and LCT 8.
- 2.1.5 The CIGBBS also assesses the role of the different areas of townscape/landscape in supporting the historic core and distinctive areas of the city. This includes the contribution which the surrounding landscape makes where the city is visible or where it forms part of the foreground of views from more distant viewpoints. The CIGBBS assessment also considered the contribution a particular character area makes to the 'essence' of Cambridge, providing a unique sense of place, both within the city and its rural setting. Consideration was given to connective areas which may include significant landscape and townscape features. The Site is not located in any of the key landscape or townscape areas that contribute to the distinctiveness of Cambridge, but rather lies within the remainder of the Green Belt, defined as 'outer rural areas of the Green Belt' (refer to Figure 1). Therefore, the Site falls within part of the broader rural context and not within the Connective, Supportive and Distinctive areas of townscape or landscape. The Site does not relate to any of the key functions and points described in the CIGBBS i.e. it does not form a backdrop in views of the city, nor provide a setting for the approaches to the Connective, Supportive and Distinctive areas. The Site is therefore not relevant to the description of: *'supportive landscape around most of the west, south and east edges of the city, where the relationship of the city to the adjacent rural landscape is an important aspect of the setting'* (para 4.14.26) referred to in the context of the outer rural areas of the Green Belt. Consequently, given the demonstrated need for mid-tech



development in Greater Cambridge, of the proposed scale and the need for a sustainable location, it is important to identify a location that is less sensitive than other parts of Greater Cambridge landscape. When considered in this context, the proposed site would be one of the most suitable locations.

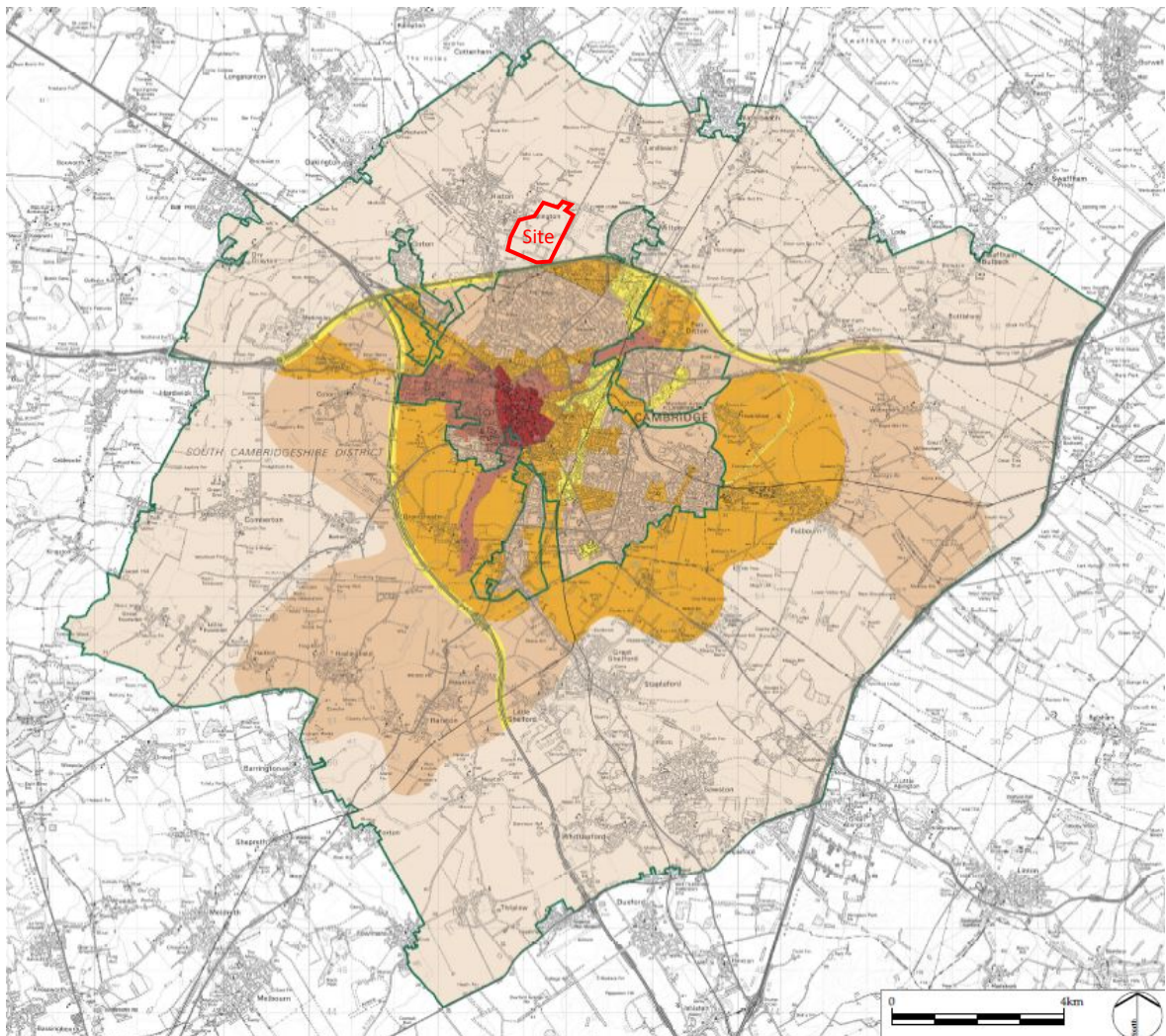


Figure 1: CIGBBS Figure 11: Townscape and Landscape Role and Function

- 2.1.6 The HELLA assessment also does not take account of changes and modifications that have occurred in the local landscape, immediately adjacent to the Site. This includes: the Evolution Business Park and the extensive market gardening, built form and structures associated with Sunclose Farm to the north of the Site; the extensive Milton landfill and Milton Recycling Centre, horse grazing and Blackwell Travellers Site, Milton Road Park and Ride to the east; the modern ribbon development and large health, education and sporting facilities that occurred on the edge of Impington to the west; and the intrusive visual and audible presence of the A14 to the south. The effect of 20<sup>th</sup> century land uses has had particular influence on the landscape to the east of the Site, with the removal of much of the original field pattern and hedgerows, and the formation of a new structure of recti-linear woodland belts. The effect of the A14 is referred to in the GCLCA and CIGBBS as creating an urban and discordant influence that has severed the link between the city and the adjoining landscape, creating an artificial edge. These combined influences create a more urban fringe character to the landscape that has not been taken account of in the HELLA.

2.1.7 It is noted that the HELLA judgement appears to be based on considering the site extent without taking account of the proposed development, in particular the proposed location of the built elements of the proposed development, retention of existing site features, the extent of the proposed country park, and proposed mitigation measures. It does not take account of the presence of the existing mature woodlands and woodland belts within the Site and how these will be retained as integral element of the proposed development layout, with the areas of built development located to take advantage of their presence to integrate the built development into the landscape. The existing network of woodland belts would significantly aid with breaking up the massing of the built areas and obscuring the proposed built forms. As a result there would be limited awareness of the scale of the proposed development. There would be a need for some additional woodland planting to fully integrate the built development. This could be delivered as advance planting to enable the planting to mature by the time development occurs. Most importantly, the assessment makes no reference to the proposed country park, which would occupy half of the Site, wrapping around the area of proposed built development, acting as a significant buffer with the retained areas of landscape and adjoining village of Impington. It is proposed that the country park would incorporate significant new areas of new habitat, biodiversity enhancements and tree/woodland planting, enhancing this part of the landscape and further integrating the proposed development into the landscape, largely preventing a visual awareness of the proposed buildings within the wider landscape. The area of proposed built development would be in a part of the Site that would be largely visually well contained, with few publicly accessible locations where it could be viewed. There would be a significant negative impact on the part of the landscape where the proposed buildings would replace farmland, but this would be true of any green field site. Beyond this localised effect, the proposed country park would provide an enhancement to the landscape. Beyond the Site, there would be limited adverse effect arising from the proposed development, with any notable adverse effect being mitigated with the establishment of any future proposed planting. It is therefore considered that the assessment of Red for Landscape and Townscape is incorrect and has not taken adequate account of the proposals and its context and should be reconsidered. The proposed Site and development would meet all the considerations set out in the methodology description for assessing landscape and townscape, a referred to in para 2.1.2 above.

## 3 Greater Cambridge Green Belt Study

### 3.1 Methodology

3.1.1 LUC have prepared the GCGBS with the primary purpose of broadening the area covered by the CIGBBS to cover the whole of Greater Cambridge, rather just the inner boundaries around Cambridge. They have applied a different approach to the LDA approach used in the CIGBBS and have returned to a ranking approach. The Study focuses on the contribution that parcels of land make to the Cambridge Green Belt purposes, rather than the NPPF Green Belt purposes. The latter are incorporated and adapted to be specifically relevant to Cambridge. The three Cambridge Purposes are identified as follows:

1. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.



2. Maintain and enhance the quality of its setting.
3. Prevent communities in the environs of Cambridge from merging into one another and with the city.

3.1.2 This reflects the previously identified factors and purposes that were considered to be important to the Cambridge Green Belt as originally set out in the Examination in Public Panel Report (2003) for the Cambridgeshire and Peterborough Structure Plan 2003, which advised that it was necessary to interpret national policy at the local level indicating that that all five purposes of the Green Belt would not necessarily be relevant to the Cambridge Green Belt. The Panel Report identified two purposes that are critical to the Cambridge Green Belt: the primary purpose being to preserve the special character of Cambridge and to maintain the quality of its setting; and the secondary purpose being to prevent further coalescence of settlements. It went on to advise that the special character of Cambridge was *'compact, dynamic city with a thriving historic centre'* and that *'apart from its unique historic character, of particular importance to the quality of the city are the green spaces within it, the green corridors which run from open countryside into the urban area, and the green separation which exists to protect the integrity of the necklace of villages. All of these features, together with views of the historic core, are key qualities which are important to be safeguarded in any review of Green Belt boundaries'*. These characteristics have been referred to and interpreted in defining the qualities referred to in the LDA studies and the GCGBS. The primary difference is that LDA applied a more qualitative approach, whereas LUC have incorporated the qualities into a more analytical and quantitative approach. As there is no agreed standard or approach to the preparing Green Belt assessments, both are considered valid approaches.

3.1.3 The purpose of the Study is stated as *'not to identify land that is suitable for development, or to set out the exceptional circumstances for releasing land from the Green Belt, and the assessment does not consider any specific potential development sites identified through Calls for Sites or other processes. However, by identifying variations in Green Belt harm at a suitably granular level, the study provides outputs that will, alongside wider evidence relating to other environmental/sustainability considerations, inform decisions regarding the relative merits of meeting the Councils' development needs in different locations'* (para 1.7). The Study goes on to advise *'assessment does not draw conclusions about what land should be released for development as that will require an analysis of wider sustainability factors which the Councils will take into account in reaching a conclusion as to whether there are exceptional circumstances to justify the release of Green Belt land'* (page 43). Consequently, the GCGBS assessment needs to be interpreted to relate to specific potential development sites, with individual parcels not necessarily correlating with identified sites. As it does not identify potential land that could be released from the Green Belt for development or the potential impact of developing sites on the Green Belt, it differs from previous studies. It is therefore important to note that the assessed harm of realising land from the Green Belt in GCGBS is potentially or likely to be different to the proposed releasing of land associated with proposed development.

3.1.4 TLP have undertaken a review of the methodology applied within the GCGBS and would make the following comments:

- a) the methodology provides a comprehensive, very detailed and evidence based approach. As such it provides a robust assessment. However, the methodology is overly lengthy and

complicated. The extent of detail provided to justify and explain the approach is extensive, which results in not being user friendly and not accessible to most readers. The likelihood is that most readers will not read it in detail or particularly understand the approach used. TLP consider it unnecessarily detailed and complicated in comparison to other robust Green Belt assessments undertaken for other LPAs, including the previous CIGBBS;

- b) LUC do not advise why they decided to deviate from the established LDA approach, which had already been recognised by the previous Local Plan inspectors as being robust and had formed an established approach to assessing the Cambridge Green Belt. One possible reason is that an approach that uses a ranking system makes it much easier to compare to different parcel assessment outcomes;
- c) whilst both the GCGBS and CIGBBS apply the same principles and have similarities, they take a very different approaches to assessing the Green Belt and utilise different parcel sizes, making it difficult to compare or correlate. It is not really possible to compare outcomes, other than perceived differences. However, this can lead to different judgements based on outcomes which are likely to be more a reflection of the different approaches rather than reflecting any actual difference or changes that have occurred in the Green Belt. As a Parcel covering the Site was not assessed as part of the CIGBBS, this is not specifically relevant to the Site. Consequently, TLP have not undertaken a comparison at other locations to determine whether the different approaches have in reality led to potential inconsistencies, but rather note that this may have occurred;
- d) there is a fair amount of overlap of contributory factors and qualities that can be applied to determining a parcel's contribution to the purposes of the Cambridge Green Belt, although this partly reflects the nature of assessing Green Belt purposes. The extent of overlap is particularly present in relation to Cambridge Purpose 1 and 2;
- e) it is noted that the highest contribution to a specific Green Belt purpose will be taken as the overall contribution for a specific Parcel, regardless as to how the Parcel contributes to the other Green Belt purposes. As the GCGBS states *'the contribution ratings for each purpose were not added up to give a cumulative overall contribution rating, as a significant contribution to one rating may in itself indicate that the land is making a significant contribution to function of the Green Belt'* (para 3.64). This a commonly applied approach, as a Parcel only needs to contribute strongly to one purpose and not contribute to the others to be functioning effectively as Green Belt. That's said, it less helpful in comparing land when there is a need to make decisions regarding exceptional circumstances for the release of Green Belt to meet the future development needs of Greater Cambridge;
- f) no definition is made of what is regarded as a 'wide gap', 'moderate gap', or 'narrow gap' in relation to Cambridge Purpose 3, which is left to the assessor to determine;
- g) examples are given as to land which lacks urbanising influences, based on what can be determined as appropriate development in Green Belt terms, which are all considered applicable except *'low density or small-scale rural settlement'* (para 3.41);
- h) the methodology refers to distinction being influenced by the cumulative impact of multiple boundary features and distance, which we agree with, but do not agree that *'if boundary*

*features are close together their combined impact can be diminished by lack of distance to separate them'* (para 3.51);

- i) whilst the process and criterion used in the assessment process are considered appropriate, TLP consider that there is one important flaw in the assessment process relating to defining variations in the harm to the Green Belt purposes. Figure 3.10 illustrates this in the form of a chart, indicating how contribution to the Cambridge Purposes should be combined with the impact of the release of adjacent Green Belt land. However, the approach shown in the chart is not applied in Table 3.6. For example Figure 3.10 would indicate that Very High Harm would arise where a Parcel has a significant contribution to Green Belt purposes and where it would significantly weaken adjacent Green Belt land i.e. major impact. However, this is not the case. Very High Harm in Table 3.6 provides outcomes that are at a lower level of impact or contribution. Consequently, this is misleading and artificially raises the bar ensuring more land falls in higher categories of harm. This leads to odd outcomes such as Moderate-High Harm, which can arise from *'release of land results in a loss of strong contribution to one of the Green Belt purposes, but would constitute a negligible impact on adjacent Green Belt land'*. Given the careful consideration that has been given to the detailed and methodical assessment to assessing contribution to the Cambridge Purposes and the impact on adjacent Green Belt land, this is unfortunate and results in the questioning of the outcomes. It is also noted that the ratings 'Very High Harm', 'High Harm', 'Moderate-High Harm', 'Moderate Harm', and 'Low Harm' are also weighted to the high end, thereby creating a skewed and unbalanced effect. It is recommended that Table 3.6 is reconsidered to accurately reflect Figure 3.10 and apply more balanced rating terms; and
- j) it is important to also note that the methodology advises *'it should be stressed that, rather than simply combining loss of contribution ratings and the impact on adjacent Green Belt ratings in a mechanical/mathematical way, professional judgement was used in each individual case to consider and evaluate how much weight to attach to each contributing element. Table 3.6 provides benchmark examples of overall harm ratings, but different combinations result in different ratings. Clear and detailed justification is provided for all ratings given in relation to how the overall judgement of Green Belt harm is reached'* (para 3.131). Whilst this is a reasonable approach, the level of detail provided for each Parcel setting is very limited and is not comparable to the extensive level of detail provided the methodology. This appears to be disproportionate, and it would have been preferable if this was more balanced, and more detail and justification had been included with the assessment of each Parcel given the importance of the decision making process.

3.1.5 It is important to note regarding the assessment of impact on the release of adjacent Green Belt land, the methodology advises *'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'* (para 3.113). As it is not realistic to account for variety of scenarios, the Green Belt study relies on applying this general principle. Whilst it may not necessarily be 'radically' different, the nature of development, its design and the amount and type of mitigation could still have a notable difference. This is why

the importance of mitigation and the different approaches to reducing harm is referred to in Chapter 5 of GCGBS. Consequently, it is important not just to take the outcomes of the GCGBS on face value when considering exceptional circumstances, but to consider each situation on a case by case approach, considering how the proposed development may be able to reduce the GCGBS assessed impact on the release of adjacent Green Belt land, as is the case for the Site.

- 3.1.6 GCGBS also notes *'due to the greater distance between land in outer areas and the inset settlements, and the subsequent very strong distinction, outer areas were all given a 'very high' harm rating. The outer area assessments do recognise some variation in contribution rating but in all cases the overall harm is still 'very high' and the areas are, as a result, much larger than the parcels defined around each inset settlement. Any significant areas of diminished openness in outer area parcels were noted, but in the context of an assessment of harm associated with expanding existing inset areas these did not affect the assessment ratings'* (para 3.133). This is a generic approach that relies on certain assumed aspects of the Green Belt, which will not always be the case. There is recognition of some variation in contribution ratings, but this is not identified in terms of location. The 'very high' harm outcomes are also a reflection of the flaw in the assessment process highlighted above. The main consideration is that the Outer Area Parcels are very large, and the level of written analysis is limited, so it is not possible to identify any variations or parts where the Parcel contributes more weakly or where its release would have less of an impact on adjoining Green Belt land. Consequently, this needs to be interpreted where exceptional circumstances are considered to be applicable.

## 4 Assessment of Parcels

- 4.1.1 The Site is located in four Parcels that of: H11; H13; a very small part of H12 and H14; the western part of K12; and the south-eastern part of OA1 (refer to Figure 2 – Site: blue outline; Area of Proposed Built Development: white outline). H11 and H13 (and the relevant parts of H12 and H14) are proposed for the country park, with only a very small part of H13 is proposed built development and would be expected to remain within the Green Belt. Part of OA1, within the north of the Site, would also form part of the country park. The remaining part of the Site within OA1 and much of the western part of K12, that falls within the Site, is proposed for release from the Green Belt to enable the development of the built elements of CSPN. A part of K12, along Mere Way, would be retained within the Green Belt, as an extension of the country park, to provide a green wedge between the built elements and Mere Way. Consequently, the focus of this report is on Parcels K12 and OA1 in relation to their assessed contribution to the Cambridge Green Belt and the assessed harm from releasing the land.



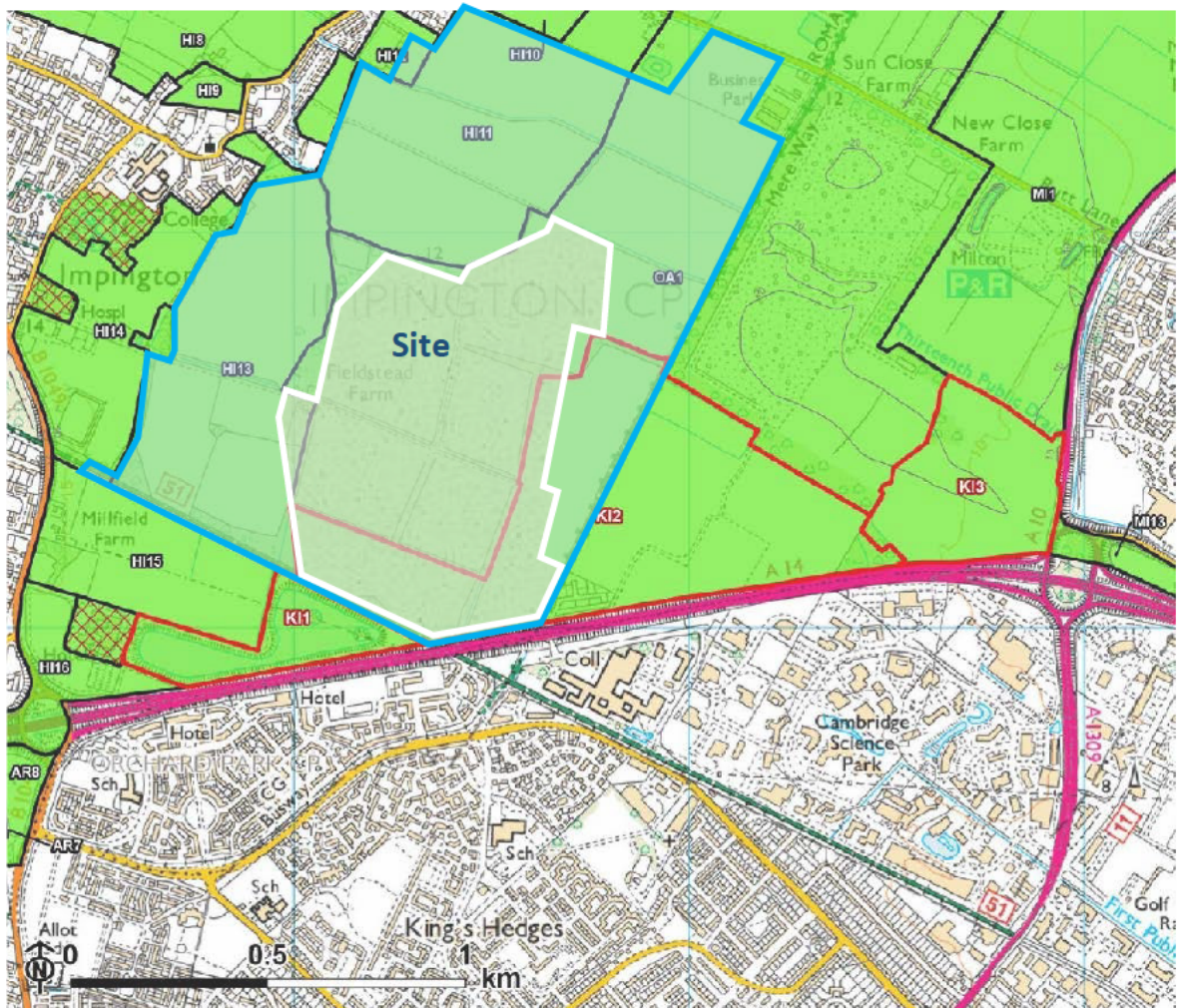


Figure 2: GCGBS Figure of Kings Hedges and Orchard Park

## 4.2 Parcel K12

4.2.1 K12 is noted as being dominated by arable land with a small developed area on Mere Way. The A14 corridor creates a strong boundary feature separating the Parcel from Cambridge, with the landform and land cover not creating any additional distinction from Cambridge. The Parcel is assessed as follows:

- ◆ Cambridge Purpose 1: Significant
- ◆ Cambridge Purpose 2: Moderate
- ◆ Cambridge Purpose 3: Moderate
- ◆ Release of Land: Minor-Moderate
- ◆ Overall Harm: Very High

4.2.2 We would agree with the assessed effects, based on LUC’s methodology, except for the judgement of Very High overall harm. Based on GCGBS Figure 3.10, we consider that harm would fall between Moderate-High Harm and High Harm. This provides a more appropriate and balanced assessment of harm, rather than Table 3.6 which is too heavily weighted towards identifying a higher level of harm.

4.2.3 We would also note that whilst the A14 does provide strong boundary feature defining the edge of Cambridge, the CIGBBS also notes that it is a strong urbanising feature creating a harsh edge to

Cambridge that has severed the association of the link between Cambridge and the adjoining landscape. CIGBBS notes that the A14 acts as an artificial edge to the city and undermines the gentle transition between the city and the fen edge. This is also highlighted in the description of one of the three key characteristics of Landscape Character Area 2B, set out in the GCLCA, in which the Site fall within the southern part, which is described as *'urban influences associated with the urban edge of Cambridge and major road network in the south which are discordant with the otherwise rural character'* (page 66). The influence of the A14 as a boundary to Cambridge does result in a significant contribution to Purpose 1. However, it is also important to take account of other considerations in relation to its influence on other qualities of the Green Belt, landscape character, views and tranquillity. TLP consider that the Site's location next to the A14 would provide an appropriate location based on other considerations and would help reduce the harsh intrusive effects of the A14.

### 4.3 Parcel OA1

4.3.1 OA1 covers a very large area forming the core Green Belt separation between Milton, Waterbeach, Horningsea, Fen Ditton, Stow cum Quy and Lode. The GCGBS notes that the Parcel mainly comprises open farmland with no significant urbanising development. The following summary statement is provided *'all land in this area is considered to have strong, or very strong, distinction from any inset or Green Belt edge settlement. This may be as a result of the presence of strong boundary features, distance from any inset settlement, lack of urbanising visual influences or a combination of these elements'*. The Parcel is assessed as follows:

- ◆ Cambridge Purpose 1: Limited/No Contribution
- ◆ Cambridge Purpose 2: Moderate
- ◆ Cambridge Purpose 3: Moderate
- ◆ Release of Land: Moderate
- ◆ Overall Harm: Very High

4.3.2 It should be noted that OA1 does incorporate 'urbanising visual influences' within the vicinity of the Site. This includes: Evolution Business Park immediately to the north of the Site; Sun Close Farm buildings and mobile homes; and Milton Recycling Centre and associated former landfill site. Whilst some of the features contained within these areas of land may not be regarded as affecting the openness of the Green Belt, they do affect the rural character and setting to Cambridge, introducing urbanising features and an urban fringe character.

4.3.3 Covering such a large area, the Parcel can only represent the principles assumed in the methodology, largely based on distance from Cambridge and the necklace villages, without identifying variations at the more localised level of the Site. Whilst it is understandable that this approach has been adopted, given the extent of the study area required for assessment, it nevertheless should be noted that this is a broad scale assessment with little detail provided within the assessment of OA1 that might highlight any sub-areas that provide more strongly or weakly contributing land to the Cambridge Purposes. That said, we would agree with the assessed effects based on LUC's methodology, as it relates to the part of the Parcel which falls within the Site, with the exception of the assessed harm. As set out above, when the harm is assessed on the basis of Figure 3.10 a level of Moderate-High harm is identified, which we consider provides a more



appropriate and balanced assessment when combining the three Cambridge Purposes and the impact from releasing land from the Green Belt. In reality, it is expected that it would be consistent with the harm associated with the part of the Site in K12. Consequently, when the two are combined, the overall assessed harm of releasing the part of the Site proposed for built development from the Green Belt would be Moderate-High Harm.

## 5 Mitigation, Beneficial Use and Enhancements

5.1.1 The GCGBS notes that were changes to the Green Belt are needed through the Development Plan process, the changes should include *'demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience'* (para 5.2). The common interpretation of the approach being that development should be in the most sustainable locations for growth. The Site does provide a sustainable location and there are key strategic reasons why the Site needs to be in this location to meet the specific needs and requirements of the proposed mid-tech type development. There is a strong economic case and justification that benefits Cambridge and the exceptional circumstances that demonstrate the need to release land from the Green Belt in this location. This is addressed in other supporting documents, and it is not the intention to address here, other to note that [REDACTED] consider that exceptional circumstances do exist and should be fully considered as part of the Local Plan review.

5.1.2 Where exceptional circumstances are proven and release of land from Green Belt is determined to be necessary, the GCGBS identifies that mitigation measures can be applied to mitigate the harm to the Green Belt. Those that would be applicable to the Site and proposed development (or could be included as the design of the development progresses), are considered to be the following (para 5.14):

- ◆ *use landscape to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance ...;*
- ◆ *define Green Belt edge using a strong, natural element which forms a visual barrier – for example a woodland belt. This can help to reduce the perception of urbanisation, and may also screen residents from intrusive landscape elements within the Green Belt (for example major roads) ...;*
- ◆ *create a transition from urban to rural, using built density, height, materials and landscape to create a more permeable edge ...;*
- ◆ *consider ownership and management of landscape elements which contribute to Green Belt purposes. This can help to ensure the permanence of Green Belt ...;*
- ◆ *enhance visual openness within the Green Belt ...;*
- ◆ *improve management practices to enhance countryside character. This can help to increase the strength of countryside character...;*
- ◆ *design and locate buildings, landscape and green spaces to minimise intrusion on settlement settings. This can help to maintain perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements ...;*

- ◆ *design road infrastructure to limit the perception of increased urbanisation associated with new development. Increased levels of ‘activity’ can increase the perception of urbanisation ...; and*
- ◆ *use sustainable drainage features to define/enhance separation between settlement and countryside. This can help to strengthen the separation between urban and open land.*

5.1.3 The GCGBS also highlights paragraph 145 of the NPPF, requiring LPAs to positively enhance the Green Belt once it has been defined, such as *‘looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land’* (para 5.16). In particular, it notes paragraph 142 of the NPPF, which states that where it is necessary to release Green Belt for development, plans should *‘set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land’*.

5.1.4 Reference is also made to the national Planning Practice Guidance (PPG) for Green Belt, which provides recommendations on appropriate compensatory improvements, which include (para 5.19):

- ◆ *new or enhanced green infrastructure;*
- ◆ *woodland planting;*
- ◆ *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- ◆ *improvements to biodiversity, habitat connectivity and natural capital;*
- ◆ *new or enhanced walking and cycle routes; and*
- ◆ *improved access to new, enhanced or existing recreational and playing field provision.*

5.1.5 Other potential enhancements applicable to the Site are identified in the GCGBS as including (para 5.22):

- ◆ *Improving access. Enhancing the coverage and condition of the rights of way network and increasing open space provision is a key enhancement opportunity.*
- ◆ *Providing locations for outdoor sport. Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.*
- ◆ *Landscape and visual enhancement. Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.*
- ◆ *Increasing biodiversity. Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins, and provision of habitat connectivity, planting of woodland. There may also be opportunities to link enhancements with requirements to deliver ‘biodiversity net gain’ associated with development proposals.*

5.1.6 The proposed country park will incorporate all the above elements, providing a significant contribution to positively enhancing the retained part of the Green Belt within the Site and appropriate compensatory improvements and enhancements, covering approximately half of the

Site. This would make a very important contribution to the Green Infrastructure (GI) of Cambridge as identified in the Greater Cambridge Green Infrastructure Opportunity Mapping, September 2021. This defines the intention of creating a North Cambridge Green Space, noting that there is a deficit in accessible GI (refer to Figure 3). There is an identified need for a strategic natural greenspace (c. 100ha) and Natural England has suggested the need for a large (c. 500ha) National Nature Reserve or similar in the area. The vision for the North Cambridge Green Space is (page 93):

*Green spaces deliver multifunctional benefits for people, nature and the climate. New strategic green space(s) to the north of Cambridge will address the deficit in accessible GI in this area, reduce recreational pressure on existing ecological sites, provide an important asset to meet growing demand from proposed development and link with other existing GI / nature recovery projects in the area. The Initiative should deliver GI which captures the local landscape character of fen-edge orchards and droves, and creates a cohesive GI network across the north of Greater Cambridge by connecting Cambridge City to the Ouse Valley.*

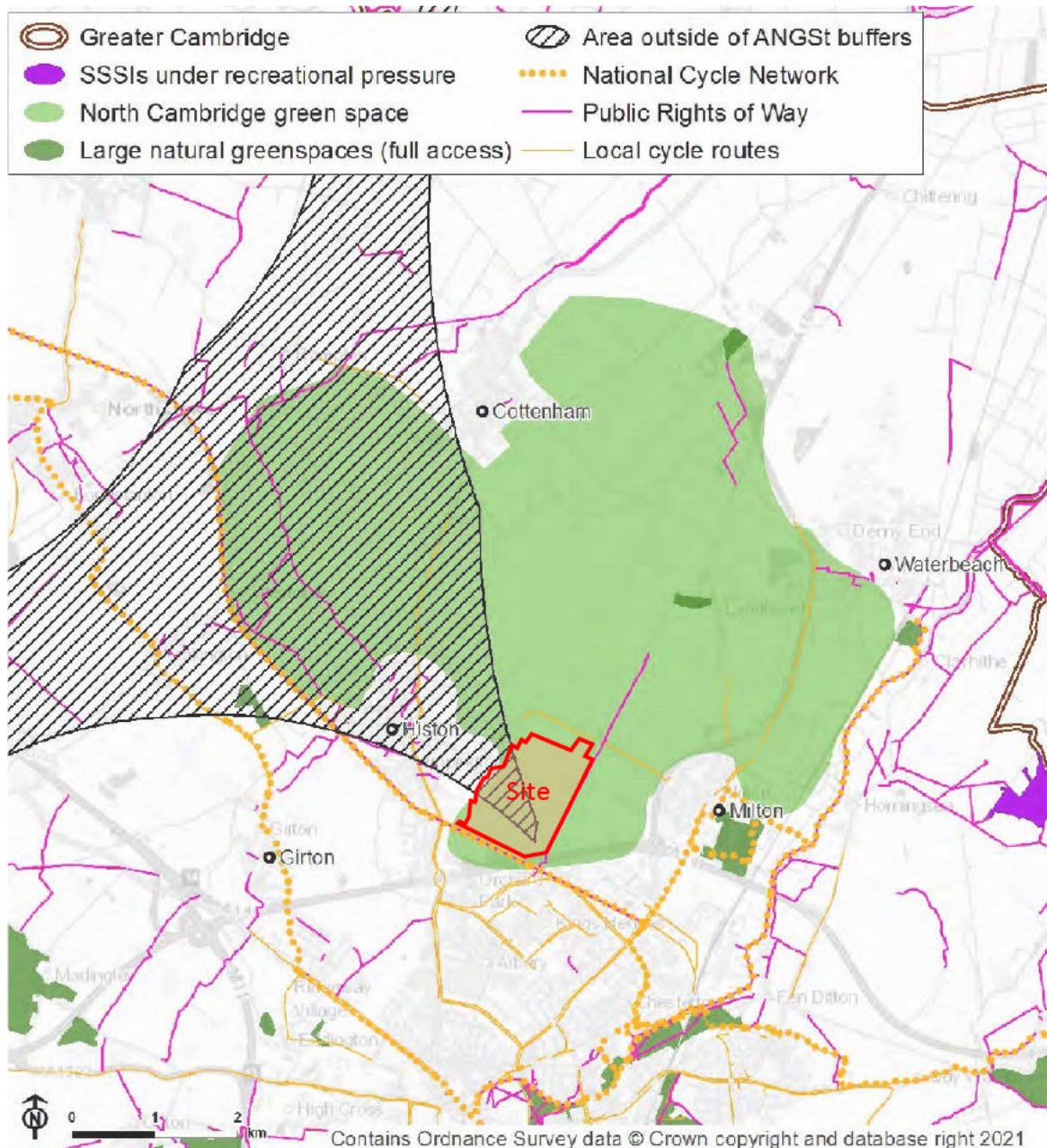


Figure 3: Greater Cambridge Green Infrastructure Opportunity Mapping (Figure 3.20)

- 5.1.7 TLP consider that the county park will make an important contribution that will offset the harm of releasing part of the Site to enable the development of the mid-tech development facility.
- 5.1.8 The proposed development would build on the reputation and excellence established within the original Cambridge Science Park. It set the standard in creating a true concept of businesses set within a parkland setting, which led to the evolution of other high quality business park in which the parkland setting formed a key part of the area of employment. The contribution and role of Cambridge Science Park is recognised in the townscape character assessment undertaken as part of the CIGBBS, in which Townscape Character Area 5A states *'Cambridge Science Park, St John's Innovation Park and Cambridge Regional College are located on the northern edge of the city off Milton Road adjacent to the A14. Cambridge Science Park, in particular, is a high quality business park with large-scale high quality commercial buildings in innovative styles housing mainly high technology companies. The buildings and car parks are partly screened by earth mounding and planting, giving it a very green and suburban character'* (para 4.7.36). Trinity College are committed to maintaining this reputation in providing a high quality extension to Cambridge Science Park through built quality, parkland, landscape and biodiversity, continuing to provide a 'very green' character, and a development that is sustainable and net positive. If the case for exceptional circumstances enables the Site to be released from the Green Belt, CSPN would provide an asset to Cambridge, creating a high quality development, with a green character, which combined with the proposed country park, would create a sympathetic development on the edge of Cambridge. The country park would create a significant buffer with the remainder of the Green Belt and neighbouring villages, creating a more appropriate and sympathetic northern edge to Cambridge. The existing woodland and woodland belts, combined with the new woodland belts could provide an appropriate, strong and sympathetic new Green Belt boundary.