

# Greater Cambridge Local Plan – First Proposals Consultation 2021

Land north of Impington Lane, Impington  
(HELAA Ref: 40061)

December 2021

**Turley**

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Rebecca Flood



**Client**

Hill Residential Limited

**Our reference**

HILC3007

1 Dec 2021

# 1. Introduction

- 1.1 This Statement has been prepared by Turley on behalf of Hill Residential Limited. It is in response to the Greater Cambridge Local Plan (GCLP) – First Proposals Consultation 2021. The Statement relates to Land to the North of Impington Lane, Impington (the ‘Site’) where representations were submitted by Hill Residential Limited in response to the Call for Sites consultation undertaken as part of the Issues and Options Consultation 2020 for residential development. The Site reference in the Housing and Employment Land Availability Assessment (HELAA) is 40061.
- 1.2 Histon and Impington is identified in the First Proposals Consultation Document as being a Rural Centre. As such, under Policy S/SH ‘Settlement Hierarchy’, the Main Urban Centre, Towns and Rural Centres will take the greatest levels of growth and will act as a ‘focus for development’. Development of allocation H/1(d), under planning reference S/1486/18, for 26 homes is underway. The objection site lies immediately north of that and provides an opportunity to meet the housing growth needs of the District and Histon and Impington as a rural centre itself.
- 1.3 This Statement focuses on the issues which affect this Site and should be read in conjunction with the documentation referenced above that has previously been submitted in relation to Land north of Impington Lane, Impington.
- 1.4 Full details of the Site were provided as part of the Call for Sites submission and therefore these are not repeated. The Statement is accompanied by an Indicative Site Layout Plan (Appendix 2) which was submitted as part of the previous submission in order to demonstrate how the Site could be brought forward to deliver a high quality scheme.

## 2. Site Context

- 2.1 Full details were provided as part of the Call for Sites Submission in relation to the Issues and Options Consultation 2020 and therefore these are not duplicated here. However, some commentary and background is provided in relation to the Site along with the provision of a Site Plan and an Indicative Site Layout Plan in Appendix 1 and 2 respectively.

### Background

- 2.2 In April 2018 a full planning application (reference S/1486/18) was submitted to South Cambridgeshire District Council by Hill Residential Limited for the development of land to the south of the Site with access taken from Impington Lane. The proposal was for:

*“The erection of 26 dwellings with associated access, car and cycle parking, open space and landscaping”.*

- 2.3 The application was subject to an appeal against non-determination and allowed in March 2019. At that time, this site was subject to a residential allocation of 1.21ha for 25 dwellings in the Local Plan 2018, identified as Site H/1d. Work has now commenced on the development of this Site in accordance with the approved plans. The draft plan also proposes to retain this allocation under policy S/RRA/H/1 (d).

### Site Context

- 2.4 The Site is located to the north of Impington Lane, on the northern edge of Impington. The Site is approximately 2.34 hectares in size and is currently given over to rough pasture. The northern, eastern and western boundaries of the Site comprise woodland and scrub while to the south are the residential properties of Merrington Place; the approved scheme of 26 homes currently under construction; and Hunters Close. Access to the Site would be off Impington Lane, through the approved access associated with the development currently under construction. This access has the ability to accommodate further homes as explained in paragraph 3.13 below.
- 2.5 The Indicative Site Layout Plan proposes a residential development of 52 homes, 40% of which would be affordable. The development would provide on-site open space and surface water drainage features which would be designed to mitigate off-site drainage issues elsewhere within Impington.
- 2.6 As a settlement, Histon and Impington currently has a wide range of job opportunities, services and facilities. These include but are not limited to a primary and secondary school, local supermarkets and village stores, public houses, restaurants and takeaways, a post office and pharmacy. The settlement also has its own employment provision through Vision Park which can accommodate office, laboratory and Research and Development uses.
- 2.7 The settlement also benefits from a number of sustainable connections via the guided busway to the Cambridge Science Park, Cambridge Business Park, CRC and Cambridge North which will in time provide further jobs, services and facilities for residents. The

inclusion of the settlement within the Greater Cambridge Greenways initiative will provide an active travel route which will make it easier for residents to travel between Cambridge and St Ives via walking, cycling and horse riding. Further, the recent improvements that have been undertaken to Histon Road have resulted in improving bus priority and reducing travel times, improved cycle lanes and the removal of some on-street car parking, all of which will make Cambridge more accessible by sustainable modes for residents of Histon and Impington.

### 3. Response to HELAA

- 3.1 The evidence base for the GCLP First Proposals document includes the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) (September 2021)
- 3.2 As has previously been stated, the Site is identified as Site Reference 40061, Land North of Impington Lane, Impington with a potential capacity for 52 housing units. The Council's site assessment is divided into three sections regarding suitability, availability and achievability with 'issues' identified and rated with a traffic light colour coding. Overall the Site has been given a 'green' rating for availability and achievability and 'red' for suitability.
- 3.3 The following section considers the criteria that the Council have provided for the suitability section of the assessment which has been given a 'red' or 'amber' rating and provides a response.

#### **Adopted Development Plan Policies - Amber**

- 3.4 Whilst the Site is outside the Development Framework, this does not prohibit the allocation of the Site through the emerging Local Plan.
- 3.5 The Site is located in the Cambridge Green Belt and a full response to this is provided within the Green Belt Review produced by Terence O'Rourke that accompanies this submission (Appendix 3).

#### **Flood Risk – Red**

- 3.6 The Site is located within Flood Zones 1, 2 and 3. The Indicative Site Layout Plan attached at Appendix 2 demonstrates that the portion of the Site located in Flood Zone 1 can accommodate the 52 new homes, whilst the areas within Flood Zones 2 and 3 are allocated to open space and/or gardens and highway.
- 3.7 As with any development proposal an appropriate surface water drainage strategy would be incorporated into the design of the scheme and in this instance the intention is to employ measures which would not only safeguard the Site but also off-site areas currently affected in the wider village.

#### **Landscape and Townscape - Red**

- 3.8 The Green Belt Assessment produced by Terence O'Rourke that accompanies this submission fully responds to the comments made by the Council on this point (see Appendix 3).
- 3.9 In summary the representation considers the LUC Green Belt Assessment methodology to be overly complex and difficult to interpret and that in relation to the Impington Site specifically, mistakes have been made in relation to the overall harm anticipated. Further, the Site does not have any public rights of way in close proximity to the Site and therefore the opportunity afforded to view the development of this Site would be

very limited. The landscape representation concludes that “the site could be removed from the Green Belt without any harm being attributed to the remaining Green Belt and the important setting of Cambridge”.

- 3.10 As a further point, it confirms that if the Council continued to consider there to be harm attributed as a result of its release from the Green Belt, then the enhancement of the existing hedgerows and woodland belts would provide more than sufficient mitigation.
- 3.11 This approach was confirmed when the approved scheme was under consideration and accepted with the development being considered to have a ‘slight adverse effect’ on the Green Belt and that with the proposed mitigation measures including planting was found to overall lower this harm to a ‘negligible effect’.

#### **Archaeology - Amber**

- 3.12 Whilst it is noted that there could be archaeological interest in the area, this would not prevent the development of the site, and could be dealt with through the submission of supporting archaeological work as part of a planning application. The approved scheme did not receive objections from the County Council Archaeological Officer and archaeological investigations were conditioned and undertaken and did not preclude the development being undertaken.

#### **Site Access – Red**

- 3.13 The Council consider that the Site does not have a direct link to the adopted public highway. However, as was made clear within the Issues and Options representations, the Site can be accessed through the current development site of allocation H1/d. This means of access has been agreed by Cambridgeshire County Council through the approved scheme and at that time it was demonstrated that the access could support 100 dwellings and is therefore capable of serving the additional development proposed.

#### **Contamination and Ground Stability – Amber**

- 3.14 The site is not known to have any potential for significant contamination, but as part of any planning application an assessment would be undertaken and any findings would be dealt with accordingly. Under the approved scheme on the adjacent site, investigations were undertaken, including additional sampling beneath existing hard standing and was found to be suitable for residential development to take place. It is not considered that the Site would be any different.

#### **Strategic Highways Impact – Red**

- 3.15 The Council comment that there is no capacity for growth and that sites would need to ensure no net increase in vehicle trips on the Strategic Road Network. Histon and Impington is a highly sustainable location which is accessible by a range of sustainable travel modes including the guided busway and recently improved cycle routes into the City Centre. Furthermore this is recognised through the categorisation of the settlement as a Rural Centre. Therefore, it is considered that this should not be a

constraint to development and that a Transport Assessment would be included to support a future planning application.

## **Conclusions**

- 3.16 It is therefore considered that the issues identified by the Council as being 'red' or 'amber' would not prohibit the allocation and eventual development of the site. Indeed it is considered that the scoring needs to be adjusted to take into account factors which the Council have overlooked, and factual errors. All of these issues can be dealt with through the provision of additional information as part of a planning application or through mitigation as part of the development of the site as would be standard practice. As such, the site is considered to be suitable for the development proposed, and the Council are therefore urged to reconsider the site for allocation as part of the Greater Cambridge Local Plan.



## 4. Response to the First Proposals Consultation Document

- 4.1 This commentary focuses specifically on the more strategic policy elements of the First Proposals Consultation Document and within the context of Land North of Impington Lane, Impington.

### Policy S/JH: New jobs and homes

- 4.2 The Council states that the new Local Plan will meet the following objectively assessed needs for development in the period 2020-2041:
- 58,500 jobs
  - 44,400 homes, reflecting an annual objectively assessed need of 2,111 homes per year, which is rounded for the plan.
- 4.3 This figure equates to an average of 2,114 homes per annum, with a suggestion that this will meet an objectively assessed housing need for 2,111 homes per annum that has been rounded upwards in deriving the total figure. It is noted that the Plan seeks to provide for approximately 10% more homes than are calculated as being needed, a total of around 48,840 homes.
- 4.4 In justifying a housing need figure above the standard method, the First Proposals cite evidence assembled in the following two studies, with the higher need predicated on supporting anticipated economic growth within Greater Cambridge:
- Greater Cambridge Local Plan: Housing and Employment Relationships (November 2020), GL Hearn; and
  - Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020), GL Hearn, SQW and Cambridge Econometrics
- 4.5 The latter of these two studies presents two alternative forecasts of potential economic growth over the plan period:
- A Central Scenario under which 58,400 new jobs would be created, claimed to represent the *'most likely outcome taking into account long term historic patterns of employment'* with the Housing and Employment Relationships study also describing it as *'a 'business as usual' growth scenario'*
  - A Higher Scenario under which 78,700 new jobs would be created, with this *'higher outcome placing greater weight on fast growth in the recent past, particularly in key sectors'* and the Housing and Employment Relationships study describing it as *'a plausible but more aspirational growth outcome'*

- 4.6 The Housing and Employment Relationships study concludes that housing provision in line with the standard method will not support either of these economic growth scenarios. It estimates the housing need associated with supporting both as follows:
- Central scenario – 41,900 to 44,310 homes (1,996-2,110dpa) with the range reflecting alternative commuting assumptions, the upper end assuming that there is a 1:1 or balanced commuting ratio for new jobs and the lower end assuming continued in-commuting
  - Higher scenario – 53,500 to 56,490 homes (2,549-2,690dpa) with the range again reflecting alternative commuting assumptions
- 4.7 The proposed housing requirement evidently aligns with the Central scenario (58,400 jobs), with the First Proposals therefore not looking to provide the housing infrastructure that would appear to be needed to accommodate a more ambitious level of employment growth.

#### **Policy S/DS: Development strategy**

- 4.8 The proposed development strategy for Greater Cambridge directs the vast majority of growth to the Cambridge Urban Area, the edge of Cambridge and new settlements. Only a very small level of growth is directed to the Rest of the Rural Area. Of the allocations proposed, the majority of these are existing commitments (adopted allocations, sites with planning permission etc.). The Council are only proposing a need for an additional 11,640 homes to be allocated through the emerging Local Plan.
- 4.9 As part of their strategy, the Council have stated that their top priority is to reduce carbon emissions and to that end, provide jobs and homes in close proximity to one another and major public transport routes. Some villages within South Cambridgeshire are however in very close proximity to Cambridge, and do benefit from close proximity to employment opportunities. Histon and Impington not only benefits from being located very close to Cambridge but it also has its own employment areas such as Vision Park which provides office and research and development accommodation for a number of large companies, together with access via the Guided Busway to the Cambridge Science Park, Cambridge Business Park, Cambridge Regional College and Cambridge North Station and in time, job opportunities and services and facilities.
- 4.10 Such housing delivery would help meet the needs of smaller settlements over the plan period, providing greater variety in the types and location of development delivered. It is important to highlight that the National Planning Policy Framework (NPPF) is clear in paragraph 69 that 'small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly' and that local planning authorities should 'promote the development of a good mix of sites'. It is considered that the Council strategy of focusing yet more homes into existing very large sites, with a much lesser number of smaller allocations, opens the Council up to the risk of delivery not being forthcoming within the plan period and the housing needs not being met. That strategy is high risk.
- 4.11 It is therefore suggested that the Council should consider allocating a greater number of small to medium size sites which can be delivered early on in the plan period where

they are located in or adjacent to settlements that can offer a good supply of shops and services, schools along with access to sustainable transport. Furthermore, paragraph 79 of the NPPF is clear that in order to 'promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.' The current pandemic has resulted in people's habits changing, shopping local rather than travelling and so locations like Histon and Impington make sustainable choices.

#### **Policy S/SB: Settlement boundaries**

- 4.12 In line with their promotion of Land North of Impington Lane, Impington, Hill Residential Limited consider that the settlement boundary should be amended to include this Site which is currently adjacent to the boundary to be included as part of the allocation of the site for residential development.

#### **Policy S/RRA: Site allocations in rest of the rural area**

- 4.13 This policy is considered to only illustrate further the lack of distribution in housing sites across villages within South Cambridgeshire. The Council state that they wish to see 'rural villages thrive and sustain their local services' and don't want to allocate housing to areas that are reliant on car travel, yet many of the rural centres have been allocated little or almost no development. Histon and Impington has one allocation which is being carried forward and is the already approved scheme adjacent to Land North of Impington Lane, Impington.

- 4.14 The Greater Cambridge Local Plan Development Strategy Options – Summary Report (November 2020) sets out work undertaken to assess further whether the spatial choices set out in the Greater Cambridge Local Plan: First Conversation consultation were indeed reasonable.

- 4.15 Consequently, eight choices were taken forward for testing as strategic options, which included:

*'Spatial Option 5: Focus on Dispersal: Villages - this approach would spread new homes and jobs out to the villages.'*

- 4.16 The document sets out that such distribution would 'result in multiple smaller sites that are likely to be deliverable in the short to medium term; this would also meet the NPPF requirement to allocate a percentage of small sites.'

- 4.17 The view was taken however that this option would be the worst for carbon emissions, encourage development to areas with poor transport links and place burdens on existing infrastructure. This broad approach does not appear to take into account specific villages and their existing provision. Histon and Impington is a rural centre with good transport links. In comparison with the current approach being advocated, i.e. edge of Cambridge and new settlements, the allocation of development to Histon and Impington would have no greater impact on carbon emissions and arguably better, as well as being on one of the radial routes into Cambridge with a wide choice of travel options. In contrast, two sites have been allocated to Melbourn, a Minor Rural Centre

with limited transport links and therefore a greater impact on carbon emissions. This further demonstrates the lack of consideration being given to specific villages and their provision.

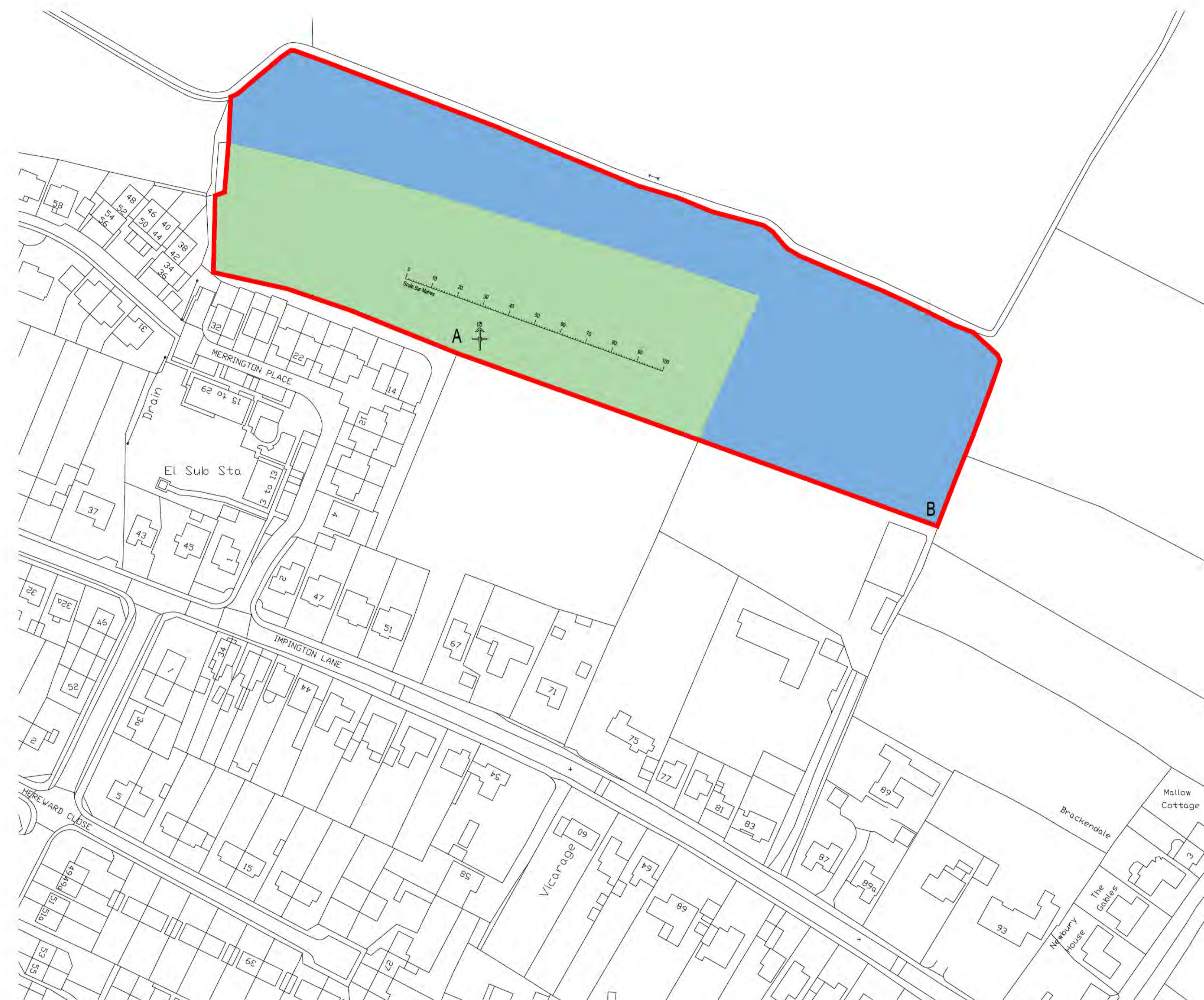
- 4.18 If the Council are of the view that new housing sites will come forward through windfall sites, then Hill Residential Limited consider that this is highly unlikely. The settlements in South Cambridgeshire have tight settlement boundaries and the availability of land within these boundaries for future housing development is limited. This is evident given the exceptionally high demand for land for development in the district. Indeed the risk may be that small sites come forward for 2 or 3 houses at a time, given the size of plots, which will increase the overall population of existing settlements, but without the means to secure funding to improve local services and facilities and with no affordable housing. As such, the Council should be taking a more comprehensive approach, whereby housing allocations are identified within settlements at this stage to deliver much needed homes in a planned manner, alongside funding for important local infrastructure.
- 4.19 It is therefore considered that the conclusion reached in the evidence base is not representative of rural centres like Histon and Impington and that the Council should give further consideration to the delivery of housing in these locations.

## **Conclusion**

- 4.20 This Statement has set out how Land North of Impington Lane, Impington is both suitable, sustainable and capable of delivering 52 new homes together with on-site open space and access. The Site has the benefit of being located adjacent to an existing scheme, currently being constructed by the same housebuilder, who is well regarded within the district, thereby ensuring a comprehensive residential development with a shared access.
- 4.21 Hill Residential Limited consider that the Council should take the opportunity to allocate this Site for development. Hill Residential Limited therefore request that the Council reconsider their current policy approach within the First Proposals Consultation Document as has been set out to ensure that sites can be delivered throughout the duration of the plan period without reliance on large schemes in order to meet the housing targets that have been set.

## **Appendix 1: Site Location Plan**

Rev. No.	Date	Amendment	Initial
A	2017-10-24	Adjustment to Redline Rear Plot 32 Merrington Place OM	IA
B	2017-10-25	Adjustment to colours at OM Request	IA
C	2017-10-25	Removal of Redline to Phase I at OM Request	IA



Client:  
Hill Residential Limited  
The Courtyard, Abbey Barns,  
Ickleton, CB10 1SX

Project:  
Land off Impington Lane  
Histon  
Cambridge

Drawing:  
Phase II Option Plan

Scale: 1:1000@A1	Date: May 2017
Drawn By: JH	Checked By: OW
CAD Ref:	Drawing No: Sketch-2017-05-09C
	Rev. No: IA

THIS DRAWING IS A COPYRIGHT  
All dimensions to be checked on site or in the workshop before work commences.  
Only figured dimensions to be worked to. Any discrepancies to be reported to the Architect.

PRELIMINARY

## **Appendix 2: Indicative Site Layout Plan**

- Proposed New Tree
- Existing tree / hedge to be retained
- Existing tree / hedge to be removed
- Flood Zone 2 (1:1000)
- Flood Zone 3 (1:100)
- River maintenance zone



Flood zone approximated from the Environment Agency's Flood Map For Planning. Survey required to determine exact extent of flood zone, and determine relationship with proposed units.

Tree Survey required to establish any tree positions within hedge H5

Note: No private garden space to flats, assumed use of PDS

All in close proximity to approximated flood zone. Some trees are in close proximity to flood zone. Distances of 25-30m due to flood zone. 30m recommended for 3 story. Increase subject to flood survey/limited window positions to second floor.

Historic flood levels is 10.05 AOD. Proposed ground floor levels to be set 10.80 AOD. Topo survey required to establish flood levels and extent of under build, ramps, steps, etc. Any raise in ground level within flood zone requires compensation elsewhere. - Information from Biwells' FRA Document.

Note: Risk 40 Corban depth of 9.3m



Redline boundary taken from OS Map. Survey required to establish exact relationship of road to boundary around site entrance track.

Tree Survey taken from Biwells documentation, this was dated 10/03/2013, based upon OS Map. Survey required to establish exact tree positions and root protection zones.



## **Appendix 3: Green Belt Assessment**

**LAND NORTH OF IMPINGTON**  
GREEN BELT REVIEW  
HILL RESIDENTIAL LTD  
DECEMBER 2021



TERENCE  
ROURKE

**LAND NORTH OF IMPINGTON**  
 GREEN BELT REVIEW  
 HILL RESIDENTIAL LTD  
 DECEMBER 2021



Issue / revision	Prepared by	N M Edmonds
Reference	Signature	239105
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	Checked by	Richard Burton
Comments	Signature	
	Date	
	Authorised by	Richard Burton
	Signature	
	Date	
	Please return by	

**LONDON**  
 23 Heddon Street  
 London  
 W1B 4BQ

**BIRMINGHAM**  
 Enterprise House  
 115 Edmund Street  
 Birmingham  
 B3 2HJ

**BOURNEMOUTH**  
 Everdene House  
 Deansleigh Road  
 Bournemouth  
 BH7 7DU

**TELEPHONE**  
 020 3684 6755

[www.torltd.co.uk](http://www.torltd.co.uk)

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Terence O'Rourke Ltd Reg  
 No 1935454 Registered Office  
 Everdene House Deansleigh  
 Road Bournemouth Dorset  
 BH7 7DU Registered in England  
 and Wales VAT No 96285727

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## 1.0 Introduction

- 1.1 This representation has been prepared on behalf of Hill Residential Ltd and reviews the new Greater Cambridge Green Belt Assessment prepared by LUC on behalf of the Greater Cambridge Partnership, GCP.
- 1.2 The purpose of this representation is to look at the land north of Impington and to review how we consider it contributes to the Cambridge Green Belt using the new LUC Greater Cambridge Green Belt Assessment.

### The site location

- 1.3 The site is located to the north of housing development off both Hunters Close and Merrington Place, themselves located off Impington Lane. The site, which from this point on will be referred to as the Impington site, is located to the north of Impington village. The site consists of two small fields, one bigger than the other. Both contain rough grassland and are likely to have been used as paddocks in the past.
- 1.4 The two fields are bounded along their northern, eastern and western boundaries by wide belts of woodland and scrub. The southern boundary is formed by either the rear garden fences to properties along Merrington Place or by a post and rail fence and new hedgerow planting adjacent to Hunters Close. A small gap of approximately 10m exists within the tree belt on the northern boundary of the larger of the two fields. See site location plan, figure 1.
- 1.5 The villages of Impington and Histon have, over the years, coalesced to form one conurbation although each retains its own identity. The main historic core of Histon, which is now designated as a conservation area, lies to the west of the Impington site and contains a large number of listed buildings mainly concentrated around The Green, Histon Manor and around the Station Road / Water Lane junction. Impington's historic core, also designated as a conservation area, has only one listed building which is St Andrew's Church. While there are isolated older buildings around Clay Close Lane and Burgoynes Road they are not listed and sit amongst largely modern residential development. See figure 2, Landscape designations.
- 1.6 The topography of the landscape surrounding Impington and Histon is relatively flat at approximately 10m AOD. The land drops to around 5m AOD 2km to the north west and rises to around 20m AOD at the village of Girton, approximately 2.2km to the south east of the Impington site. The Impington site and the landscape in its immediate surroundings is flat. See figure 3, Topography.
- 1.7 While there are plenty of public rights of way, (PROW), within Histon and Impington itself, there is extremely limited public access to the landscape north of Impington. The nearest PROW is the Mere Way that follows the line of a Roman road, located approximately 1.6km to the east of the Impington site's eastern boundary. A permissive footpath is located approximately 1.75km to the north. See figure 4, PROW.
- 1.8 In terms of site visibility, due to the lack of public access the Impington site is largely screened from view. It is only visible from the new housing development along Hunters Close and possibly from the rear gardens to properties along

Merrington Place. While there may be some visibility of the Impington site from rear gardens to properties along Mill Lane, Ambrose Way and Paddock Close in the west and from rear of properties along Clay Close Lane, this is very doubtful. Almost all the rear gardens to these properties are backed with lines of trees and scrub or pockets of woodland. This vegetation and the numerous juxtaposed hedgerows, tree belts and woodland/scrub, that form the boundaries to the numerous small fields and paddocks mean visibility of the Impington site is highly unlikely and will be glimpsed at best, even in the winter.

- 1.9 In terms of visibility towards the landscape surrounding the Impington site, the same situation of woodland tree belts and scrub to the rear of properties and the juxtaposed hedgerows, tree belts and woodland/scrub forming the landscape, mean opportunities for experiencing views of the landscape are limited. However, there is a length of Milton Road that has no hedgerow on its western edge. From this area of the road views towards the open farmland will be afforded along with views from rear upper storey windows of residential properties backing onto this road off Woodcock Close. Views may also be afforded from residential properties fronting Milton Road, if views are afforded over the hedgerow lining the western edge of this stretch of Milton Road.

### **Report structure**

- 1.10 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 Impington 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 Impington site is located. This section makes reference to the methodology used and highlight areas of the assessment, assumptions and conclusions that we may disagree with
  - Stage 3 – Assessment of how the Impington site contributes to the Cambridge Green Belt purposes in relation to the new LUC assessment and report conclusions

## 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, the LUC assessment 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 each parcel is either 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 regards to purpose 1, we disagree that because an inset settlement may be in relatively close proximity to Cambridge or is tentatively 'linked' to Cambridge via a single line of linear development that this means the land surrounding the entire inset settlement therefore has some relationship with the urban edge of the city
- 2.14 We therefore consider that parcels located on the far side of these settlements or those contained by their inset settlement, and therefore more closely associated with the inset settlement rather than Cambridge, should not have been included in the assessment of purpose 1.
- 2.15 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 how the role the gap between settlements perform.

- 2.16 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 cross reference back to the criteria within paragraphs 3.31-3.35, all of which seems unnecessarily confusing.
- 2.17 Furthermore, we fundamentally disagree with the way the criteria provided in paragraphs 3.31-3.35 are used in table 3.4. There are examples where a gap of 2.5km between two inset settlements is described as a moderate gap while in other instances where there are settlements are the same distance apart the gap is considered to be wide.

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

- 2.18 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.”*

- 2.19 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.
- 2.20 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.
- 2.21 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.
- 2.22 Therefore, the test is weather 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**

- 2.23 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.
- 2.24 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**

- 2.25 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 these in greater detail in stage 2.
- 2.26 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.
- 2.27 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.
- 2.28 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**

- 2.29 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)
- 2.30 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.
- 2.31 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**

2.32 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)

2.33 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.

2.34 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 the judgement.

### 3.0 Stage 2 – Review of the LUC Green Belt assessment for land north of Impington

#### Introduction

- 3.1 The land pursuant to this study is indicated on figure 1, Impington site location plan. Figure 2 indicates the same site boundary overlaid on the LUC parcels for this area of Impington.
- 3.2 The LUC assessment for the parcels relating to the Impington site are included in appendix A. As can be seen from figure 5 the LUC parcel of relevance is parcel HI8. Parcels HI7 and HI9 have been included as they are located adjacent to parcel HI8 in which the Impington site is located.
- 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 commentary on the assessment scores for these parcels in relation to the Impington site boundary.

#### Overview of the Green Belt assessment of the Impington site parcels

- 3.4 Table 3.1 below indicates the LUC assessment for parcels HI7, HI8 and HI9.

Green Belt Purposes	Parcel HI7	Parcel HI8	Parcel HI9
Openness	Mostly open	Open	Open
Distinction	Strong distinction	Moderate distinction	Weak distinction
Cambridge Purpose 1	Relatively significant contribution	Moderate contribution	Relatively limited contribution
Cambridge Purpose 2	Moderate contribution	Moderate contribution	Moderate contribution
Cambridge Purpose 3	Moderate contribution	Relatively limited contribution	Limited/No contribution
Impact on adjacent Green Belt Land	Minor-Moderate	Minor – Area 1 Negligible – Area 2	Negligible
Overall harm of Green Belt release	Very High	Moderate High – Area 1 Moderate – Area 2	Low

Table 3.1, LUC Green Belt assessment of the Impington site parcels

- 3.5 As can be seen from figure 5, most of the Impington site falls within a small section of parcel HI8 which is assessed as having a moderate distinction from Impington and providing a moderate contribution for purposes 1 and 2 and a relatively limited contribution for purpose 3.
- 3.6 Parcel HI9, which is located to the south east of HI8, was assessed as having a weak distinction from Impington and providing a relatively limited contribution for purpose 1, a moderate contribution to purpose 2 and a limited to no contribution for purpose 3.
- 3.7 LUC have recognised that parcel HI8 has two distinct areas and therefore the assessment on harm to adjacent Green Belt land has been split between areas 1 and 2. See figure 5. Area 1, which consists of the more open fields beyond the smaller paddocks edging Histon and Impington, was assessed as causing minor

harm on adjacent Green Belt land and an overall harm if released from Green Belt of moderate high. The smaller paddocks making up area 2 were assessed as creating a negligible impact on adjacent Green Belt land and an overall moderate harm if released.

- 3.8 Parcel HI9 as assessed as creating a negligible impact on adjacent Green Belt land and an overall low harm if released.
- 3.9 As can be seen, parcel HI7, located beyond the built extent of Histon and Impington, was assessed as having a strong distinction from the inset villages and was generally assessed as contributing more highly for purposes 1-3 and therefore overall was considered to create very high harm if released.

### **Parcel definition**

- 3.10 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. LUC state that the parcels are defined by looking at both how they contribute to the purposes of the Cambridge Green Belt and also their level of distinction from Cambridge or the inset villages. While LUC have recognised there are two distinct areas within parcel HI8 they have only assessed their differences in relation to their harm on adjacent Green Belt land if they are released from the Green Belt.
- 3.11 However, they have not assessed both areas individually in regards to their distinction and contribution to the purposes of the Cambridge Green Belt. Had they done so and followed their own methodology we feel they would have identified these two areas as separate parcels. We look at this in more detail in the following sections.

### **Openness**

- 3.12 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 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. However, when looking at the assessment of distinction between a parcel and an inset area there is little information regarding visual openness and how visually constrained a parcel may be or how limited the visual impact may be due, for example, to topography, vegetation and built form.

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

- 3.13 As discussed above, distinction is assessed for parcel HI8 as a whole rather than as two separate parcels, area 1 and 2. As such, while the assessment describes how Milton Road forms a moderate boundary feature to the east and describes the parcel as contained by the villages of Histon and Impington with the rear gardens to houses along its southern, eastern and western boundaries creating little separation between the parcel and the inset villages, it uses the size of the overall parcel to state that this limits the urbanising influences of these features. For this reason, it assesses parcel HI8 as having moderate distinction.

- 3.14 However, looking at just area 1, while we agree that there are urbanising elements from the roofline and rear fences to properties and their gardens to the east, west and south, these are softened by the intervening hedgerow vegetation that forms the boundaries of the individual paddocks and small fields that make up area 2. We therefore feel that only area 1 should be assessed as having a moderate distinction between the inset villages.
- 3.15 Regarding area 2, we agree that the back gardens of the houses to the south and west of the parcel create little boundary separation between the parcel and Impington. We also agree this parcel area is largely contained. From these small fields and paddocks, views of residential properties to the south, east and west create urbanising visual influences. We equally agree that the small fields and paddocks do not create any additional distinction from Impington. For this reason we consider that area 2 has a weak distinction from Impington.

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

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

- 3.16 We consider that even where “necklace” villages are within relatively close proximity to Cambridge or are tentatively ‘linked’ to Cambridge via a single line of linear development, parcels located on the far side of these settlements should not have been included in the assessment of this purpose, as we do not feel they are so visually or physically associated with Cambridge to have any bearing on preserving its character.
- 3.17 Parcel HI8 does not really fit within any of the criteria provided in table 3.2 which provides the criteria for assessing purpose 1. These criteria deal purely with the relationship of the parcel and the main urban area of Cambridge. LUC state in their methodology in paragraph 3.28 that for land to contribute to this purpose it is:

*“...dependent on the variation of openness and in the degree of distinction from the edge of Cambridge.”*

- 3.18 Parcel HI8 doesn’t have any relationship with the main urban area of Cambridge.

- 3.19 LUC state that land within parcel HI8 is:

*“...nearly contiguous with Cambridge but retains some distinction from the main City area...”*

- 3.20 The parcel is on the north of Impington and enclosed by the eastern edge of Histon and the western edge of Impington. We very much disagree that it is “nearly contiguous with Cambridge”. It is not contiguous as there are numerous woodland belts, the NCN51 Busway and the dual carriageway A14 that provide physical and visual forms of separation with the city and Impington. The description that the parcel retains “some distinction from the main City” is also not true. It is completely contained by residential properties off Mill Lane, Impington Lane and Milton Road. It has no relationship with the edge of Cambridge city, instead the land is more closely associated with the settlements of Histon and Impington.

- 3.21 As LUC have decided to include these parcels we have provided our review of their findings as follows:
- 3.22 In looking at the parcel as two distinct areas and trying to use LUC's methodology to assess the parcel areas we are led through their methodology to agree that as area 1 has a moderate distinction from Impington, as discussed previously, then it loosely falls under the following vague criteria provided in table 3.2 for assessing purpose 1, which state:

*"Land is perceived as being within the main urban area of Cambridge but is open, has moderate distinction from the urban edge and is physically and visually connected to the wider Green Belt; or..."*

- 3.23 As stated above, we do not feel that area 1 of parcel HI8 can be described as land perceived as being within the main urban area of Cambridge. LUC state that it does have:

*"...some relationship with urban area but also a degree of distinction from it..."*

- 3.24 In looking at parcel HI8 area 2, as we consider that this has a weak distinction from Impington and Histon, it most closely falls under the criteria for providing a relatively limited contribution to this purpose which state:

*"Land is open and is physically and visually connected to the wider Green Belt, but is perceived as being within the main urban area of Cambridge and has weak distinction from the urban edge; or..."*

- 3.25 Having undertaken the exercise above in order to justify LUC's assessment of parcel HI8 and its contribution to Cambridge Green Belt purpose 1, we are convinced that the criteria provided cannot be used for this parcel. We fundamentally disagree that this parcel can be described as being perceived to be within the main urban area of Cambridge.
- 3.26 It therefore follows that parcel HI8, areas 1 and 2, should have been assessed as making no contribution to purpose 1 as the parcel has no relationship with the edge of Cambridge city. Instead, the land is more closely associated with the settlements of Histon and Impington.

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

- 3.27 To assess this purpose LUC look first at the rural character of a parcel and its distinctiveness from an inset settlement. They then consider the way in which the land contains features or aspects that contribute to the quality of Cambridge's setting. The features that are considered are: the visual relationship between Cambridge and the surrounding countryside, green corridors that penetrate into the city, approaches into the city, designated sites or features that contribute positively to the character and setting of the city, the scale, character, identity and rural setting of the Green Belt villages and lastly the topography that provides a framework for the city.
- 3.28 The contribution to purpose 2 of parcel HI8 is assessed by LUC as being moderate. Both areas of the parcel comprise open farmland and woodland. LUC state that the land lies partly within and fronts directly onto the Histon and

Impington conservation areas. This is not true. The parcel is close to the Histon conservation area but doesn't front directly onto it. Modern properties along Merrington Place separate it which means there is no intervisibility between this conservation area and parcel HI8. The parcel does however, directly front and lie partly within a very small length of Clay Close Lane, within Impington conservation area. With the exception of one or two older buildings along this length of road, none of which are listed, the remainder are all modern dwellings.

- 3.29 However, LUC consider that the closeness to these two conservation areas to parcel HI8 creates a relationship with features / designations that contribute positively to the character and setting of the city. They state that the two conservation areas:

*“allows for some appreciation of the rural character and setting of the more intact and historic parts of Impington (Including Burgoynes Road), which in turn contribute to the wider rural setting of Cambridge...”*

- 3.30 We consider this assessment to be extremely tenuous. There is limited intervisibility with the Impington conservation area and none whatsoever with the Histon conservation area. It isn't enough to state that an area provides a rural character and setting. It needs to be physically experienced and viewed by people in order for the 'setting' to be perceived. Only a short length of Clay Close Lane affords views of the parcel. Otherwise, the conservation area has no views to or from the parcel.

- 3.31 We therefore consider that while area 1 has a moderate distinction from Impington and area 2 has a weak distinction, both areas should be assessed as providing a relatively limited contribution to Cambridge Green Belt purpose 2. The criteria most align state:

*“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; or”*

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

- 3.32 Parcel HI8 is assessed as being in a wide gap between Impington and Landbeach. As LUC assess the full parcel as having a moderate distinction from Impington, it is therefore assessed as making a relatively limited contribution to purpose 3.
- 3.33 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 'sub-set' of criteria provided in 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.
- 3.34 As stated in stage 1, we also disagree with this 'sub-set' of criteria in paragraphs 3.31-3.35. The gap between the two settlements of Impington and Landbeach is approximately 2.5km wide and yet there are other settlements of equal distance



apart that are assessed as being in a moderate gap. We consider the criteria for this purpose are overly complex and open to interpretation.

- 3.35 If we look at parcel HI8 area 1, then as it has a moderate distinction from Impington and is considered to be in a wide gap it falls most closely into the criterion provided by LUC in their table 3.4 as providing a relatively limited contribution to purpose 3 which states:

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

- 3.36 However, if we look at parcel HI8 area 2, then as it has a weak distinction from Impington and is considered to be in a wide gap it falls most closely into the criterion provided by LUC in table 3.4 as providing a limited to no contribution to purpose 3 which states:

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

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

- 3.37 This is the only section within the assessment of parcel HI8 where LUC assess areas 1 and 2 separately. If released for expansion to Impington, area 1 is assessed as creating minor harm to the adjacent Green Belt land. The assessment of harm to adjacent Green Belt land for the release of area 2 is negligible.

- 3.38 We agree with this assessment.

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

- 3.39 Parcel HI8 area 1 was assessed as creating moderate high harm if released from the Green Belt. This is incorrect.

- 3.40 To create moderate high harm the assessment of the parcel's Green Belt contribution would have to be a strong contribution to one of the Green Belt purposes and constitute a negligible impact on adjacent Green Belt land, or to make a relatively limited contribution to one of the Green Belt purposes but constitute a moderate impact on adjacent Green Belt land.

- 3.41 As assessed by LUC, area 1 made a moderate contribution to purposes 1 and 2 and a relatively limited contribution to purpose 3 and if released constituted minor harm on the adjacent Green Belt land. It therefore should have been assessed as creating moderate harm if released, as per the following criterion provided in LUC's table 3.6 which states:

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

- 3.42 In terms of parcel HI8 area 2, LUC state the release of this land would create moderate harm. This again is incorrect.

- 3.43 Even if we use LUC's assessment of the three purposes, which are moderate contribution to purposes 1 and 2 and a relatively limited contribution to purpose 3,

they state the harm to adjacent Green Belt land would be negligible. Using their criteria as set out in table 3.6 would mean the harm rating should be low as it aligns with the following criterion:

*“Release of land results in a loss of moderate contribution to one of the Green Belt purposes, and would constitute a negligible impact on adjacent Green Belt land; or”*

3.44 However, if you consider our re-assessment of the areas’ contribution to the three Green Belt purposes, then area 1 makes no contribution to purpose 1 and only a relatively limited contribution to purposes 2 and 3. Area 2 makes no contribution to purpose 1, a relatively limited contribution to purpose 2 and limited to no contribution for purpose 3.

3.45 This re-assessment would put area 1 in line with area 2, as creating low harm. In terms of the re-assessment of area 2, none of the criteria provided match the area’s re-assessment. However, as it contributes less than any of the two criteria provided under low harm, we assume it would also create low harm if released.

**Summary of the Green Belt re-assessment of the Impington site parcel**

3.46 Table 3.2 below indicates the re-assessment for parcel HI8 areas 1 and 2.

Green Belt purpose	LUC assessment of Parcel HI8	Re-assessment of Parcel HI8 Area 1	Re-assessment of Parcel HI8 Area 2
Openness	Open	Open	Open
Distinction	Moderate distinction	Moderate distinction	Weak distinction
Cambridge Purpose 1	Moderate contribution	Moderate contribution using LUC methodology We consider it makes no contribution	Relatively limited contribution using LUC methodology We consider it makes no contribution
Cambridge Purpose 2	Moderate contribution	Relatively limited contribution	Relatively limited contribution
Cambridge Purpose 3	Relatively limited contribution	Relatively limited contribution	Limited/No contribution
Impact on adjacent Green Belt Land	Minor – Area 1 Negligible – Area 2	Minor	Negligible
Overall harm of Green Belt release	Moderate High – Area 1 Moderate – Area 2	Low harm	Low harm

Table 3.2, Green Belt re-assessment of the Impington site parcel

## 4.0 Stage 3 – Assessment of the Impington site in relation to the LUC assessment methodology

### The Impington site assessment

#### *Openness*

- 4.1 Assessed by LUC, the site would be described as open. In terms of the spatial element to openness this would be correct. The site has no inappropriate development and consists of two open rough grass paddocks. However, if we look at the visual openness of the Impington site then it is very enclosed.
- 4.2 Existing residential development forms the southern boundary, while thick hedgerows of trees and scrub form the partition between the two fields and the eastern and western boundaries of the site. The northern boundary, especially to the larger of the two fields, is more of a narrow woodland belt than a wide hedgerow. However, there is a narrow gap of approximately 10m wide located centrally along its length. Views into the surrounding landscape are therefore limited to the small gap in the north boundary and towards the housing to the south. This housing predominantly limits views beyond. The Impington site is therefore visually enclosed and is more associated with the residential edge of Impington than with the countryside beyond.
- 4.3 Furthermore, due to a lack of PROW, views of the Impington site from the surrounding landscape cannot be experienced apart from on a short length of Clay Close Lane, from where looking west the site may be visible through the vegetation that forms the Impington site's eastern boundary. Otherwise the only impact on visual openness will be experienced from people/receptors/residents along Hunters Close and possibly residents within rear gardens to properties along part of Merrington Place.

#### *Distinction*

- 4.4 Like area 2, the actual Impington site has back gardens to houses along Merrington Place and houses fronting Hunters Road forming its southern boundary, which create little separation between the parcel and Impington. As stated above, the Impington site is also very contained although it has the urbanising influences from residential development adjacent to its southern boundary and the paddocks themselves do not create any additional distinction from Impington. It therefore is assessed, like area 2, as having a weak distinction to Impington.

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

- 4.5 In terms of our assessment of the Impington site and how it contributes to the three Cambridge Green Belt purposes, we consider it performs in the same way that we have re-assessed area 2. It makes no contribution to purpose 1, relatively limited contribution to purpose 2 and limited to no contribution to purpose 3.

#### *Impact on contribution of adjacent Green Belt and overall harm if released*

- 4.6 Like area 2, the Impington site if released would create negligible harm on the adjacent Green Belt land and would create only low harm.

### **Summary of assessment for the Impington site**

3.47 Table 4.1 below gives the re-assessment for parcels H18 areas 1 and 2 and the Impington site.

Green Belt purpose	Re-assessment of Parcel H18 Area 1	Re-assessment of Parcel H18 Area 2	Assessment of Impington site
Openness	Open	Open	Open
Distinction	Moderate distinction	Weak distinction	Weak distinction
Cambridge Purpose 1	Moderate contribution using LUC methodology We consider it makes no contribution	Relatively limited contribution using LUC methodology We consider it makes no contribution	Relatively limited contribution using LUC methodology We consider it makes no contribution
Cambridge Purpose 2	Relatively limited contribution	Relatively limited contribution	Relatively limited contribution
Cambridge Purpose 3	Relatively limited contribution	Limited/No contribution	Limited/No contribution
Impact on adjacent Green Belt Land	Minor	Negligible	Negligible
Overall harm of Green Belt release	Low harm	Low harm	Low harm

Table 4.1, Green Belt re-assessment of the Impington site

### **Conclusions**

- 4.1 As stated previously, overall, we feel the LUC assessment methodology is overly complex, and difficult to interpret. It therefore lays itself open to interpretation and rather than being clear and transparent it becomes confusing and muddled.
- 4.2 Unlike previous LUC Green Belt assessments, the criteria used to grade the contribution a parcel makes for each of the three Cambridge Green Belt purposes are overly numerous, far too similar in their wording and rely too heavily on using 'sub-sets' of further criteria in earlier sections of the methodology or pages of elements/features and designations that require added consideration.
- 4.3 Equally, their methodology for defining parcels is again too complex and open to interpretation. They state that they broadly look at all land to see how it performs against each of the three Green Belt purposes and then look at its distinction from Cambridge or the inset settlement to apply variations in its performance. This does not follow through when you look more closely at individual parcels or groups of parcels.
- 4.4 There are boundaries that make no sense and there is no written justification for how the parcels are defined within the individual parcel assessment appendices. In certain instances, they divide parcels when they assess the impact of harm of releasing the land for Green Belt. However, like parcel H18, which was divided into areas 1 and 2, they did not assess these areas separately to understand how they contribute to the three Green Belt purposes.
- 4.5 In using the LUC methodology we consider that the two areas perform differently than the whole. Therefore, if LUC defined the land by assessing how it

contributes to the Green Belt purposes and its level of distinction from an inset village or from Cambridge, why were parcel HI8 areas 1 and 2 not defined as two separate parcels?

4.6 We disagree with the contention that because an inset settlement may be in relatively close proximity to Cambridge or is tentatively 'linked' to Cambridge via a single line of linear development that this means the land surrounding the entire inset settlement therefore has some relationship with the urban edge of the city.

4.7 LUC state that to contribute to this purpose it is:

*"...dependent on the variation of openness and in the degree of distinction from the edge of Cambridge."*

4.8 However, where they have assessed parcels for their contribution to purpose 1 that are located on the far side of these settlements or those contained by their inset settlements, they have described the distinctiveness between the inset settlements that they are most associated with rather than with Cambridge. In the examples we have investigated, the parcels concerned have no relationship/distinctiveness with the urban edge of the city.

4.9 We therefore consider that parcels located on the far side of these settlements or those contained by their inset settlement and therefore more closely associated with the inset settlement rather than Cambridge, should not have been included in the assessment of purpose 1.

4.10 We find the sub-set of criteria for grading the strength of gap between two settlements, as indicated on paragraphs 3.31-3.35 of the LUC methodology, flawed, as well as being confusing in having to refer to this sub-set of criteria when using the criteria in table 3.4 for purpose 3. Some settlements that are referred to as being within a wide gap are approximately 2 -2.5km apart while others with the same distance apart are termed as being in a moderate gap.

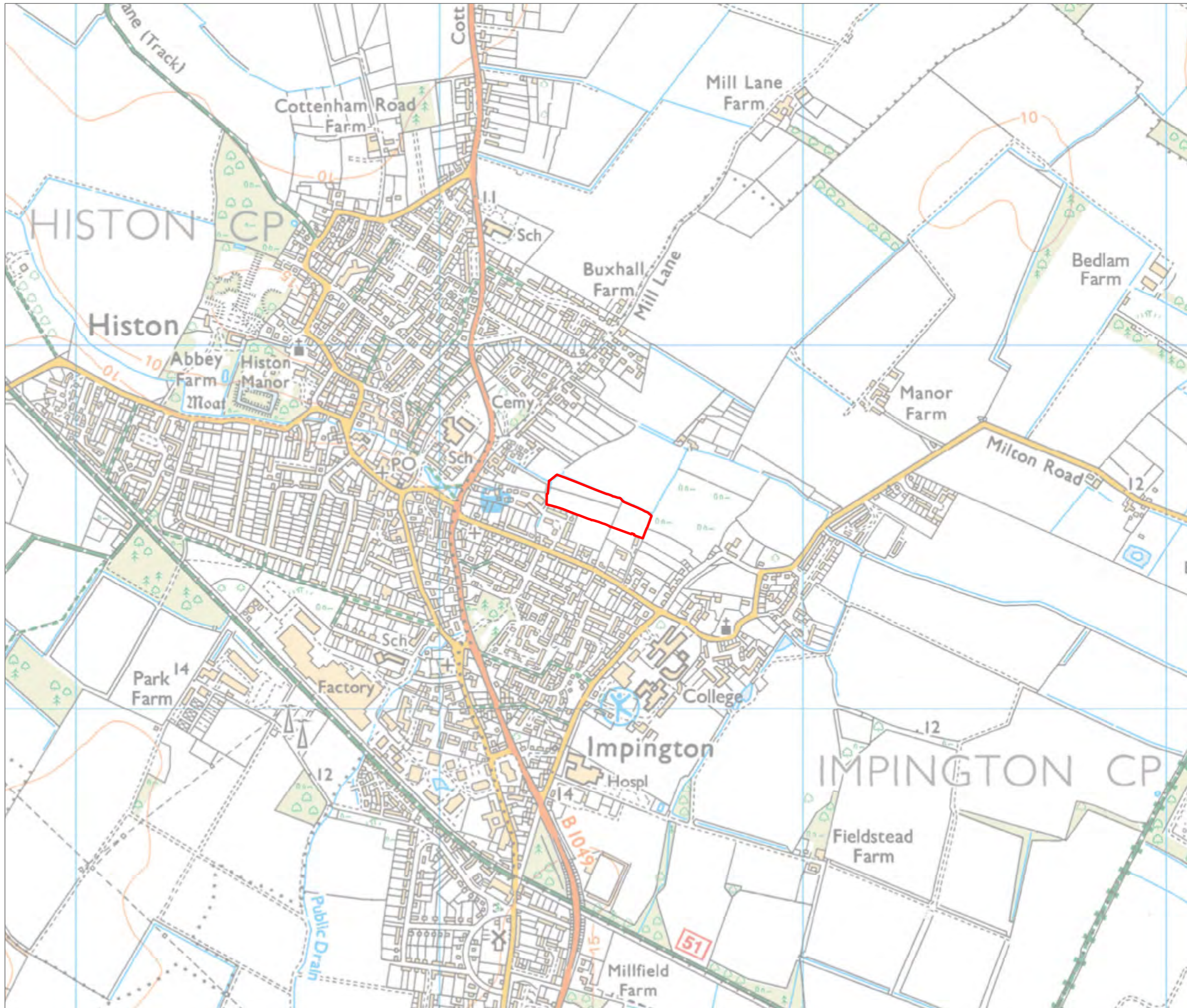
4.11 We do not agree with some of the assumptions made regarding the effect on harm and the assumption that mitigation such as new or strengthened boundary treatment would make little to no difference in regards to the harm caused if released from Green Belt.


4.12 Finally, as can be seen with our of re-assessment of parcel HI8, mistakes have been made by LUC in their assessment of overall harm. Even disregarding our re-assessment of the Impington site and using LUC's own assessment of distinction and contribution to the Green Belt purposes, the level of harm if released was incorrectly increased, whereby area 1 was given moderate high rather than moderate and area 2 was given moderate harm when it should have been low.

4.13 LUC state in their methodology that if professional judgement is used then a clear and detailed justification on how a judgement was reached will be provided. As for the assessment for parcel HI8 areas 1 and 2, this is often not the case.

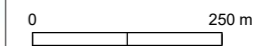
4.14 In terms of the Impington site, it does not contribute to purpose 1, makes limited contribution to purpose 2, limited to no contribution to purpose 3, will create a negligible impact on adjacent Green Belt land and will cause only low harm if released.

- 4.15 We therefore conclude that the Impington site and its contribution to the purposes of the Cambridge Green Belt, it could be removed from the Cambridge Green Belt and developed without harm to the remaining Green Belt and the important setting of Cambridge.
- 4.16 Furthermore, we consider that any harm attributed to the release of this land from the Cambridge Green Belt could be further mitigated by the enhancement of the existing hedgerows and woodland belts. In order to be viable, it is likely that some of the woodland within the wide belt along the northern boundary of the larger of the two fields would need to be removed. By retaining a strong belt along the northern edge and filling in the small gap the existing boundary vegetation can be retained, enhanced and maintained.



 Site boundary

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**Figure 1: Impington site location**

Dwg no/239105 IMP 1	Revision
Status	December 2021
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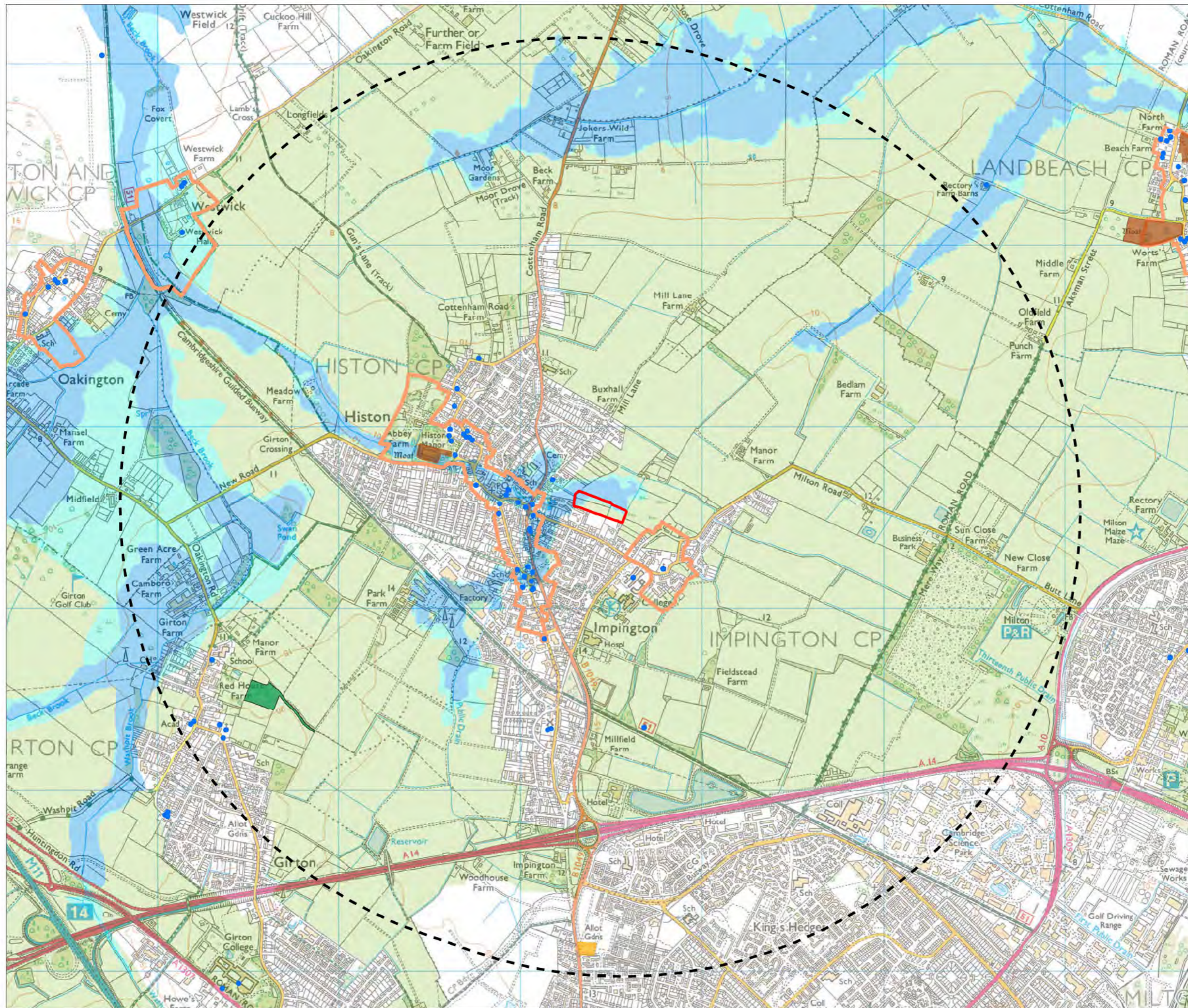
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LONDON  
23 Heddon Street  
London W1B 4BQ  
BIRMINGHAM  
Enterprise House 115 Edmund Street  
Birmingham B3 2HJ  
BOURNEMOUTH  
Everdene House Deansleigh Road  
Bournemouth BH7 7DU

**TERENCE O'ROURKE**

TELEPHONE  
020 3664 6755  
www.torltd.co.uk



- Site boundary
- 2.5km study area
- Listed buildings
- Scheduled monuments
- Conservation areas
- Site of Special Scientific Interest
- Woodland Trust site
- Flood Zone 2
- Flood Zone 3
- Green belt

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**Figure 2: Landscape designations**

Dwg no/239105 IMP 2	Revision
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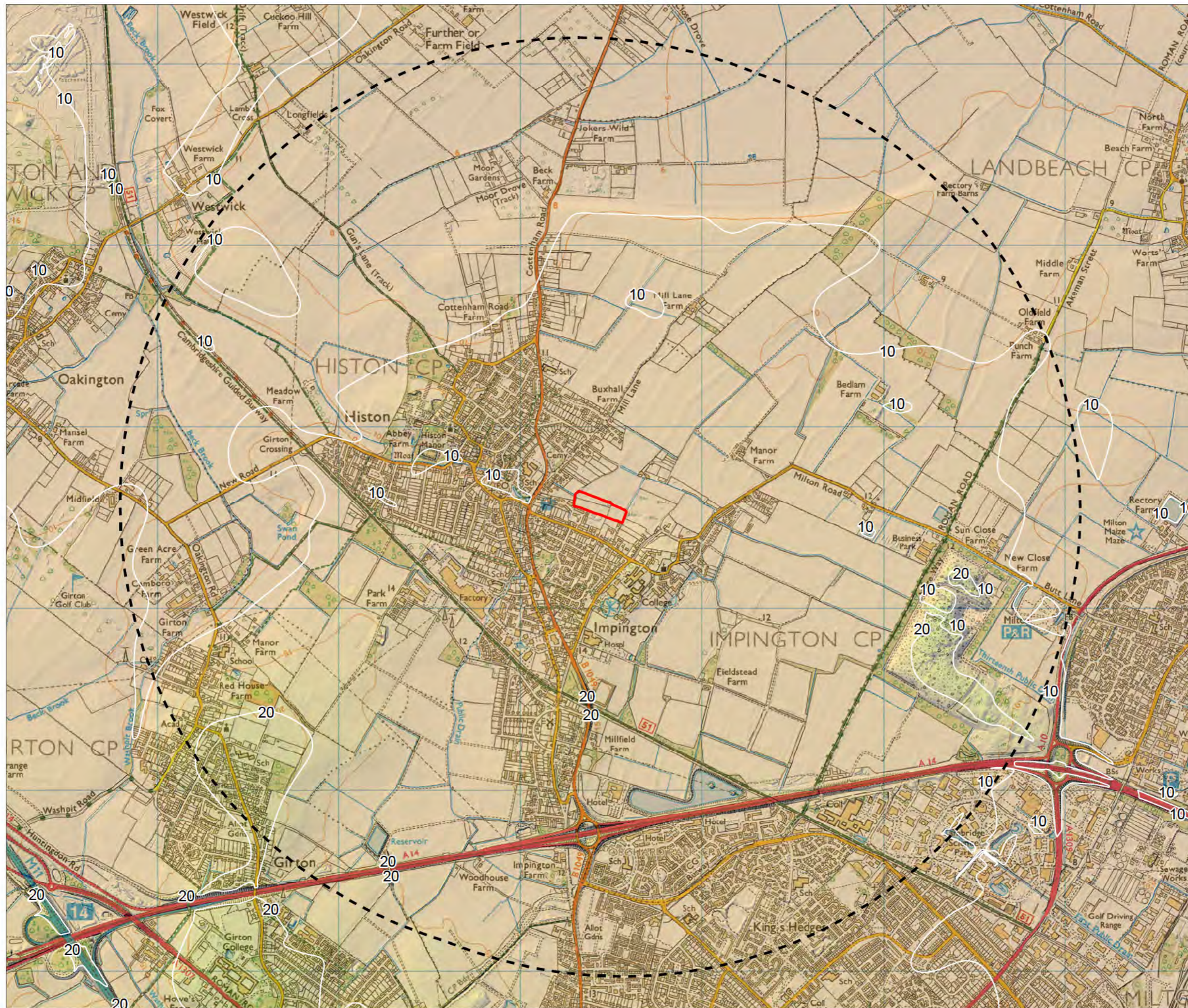
**LONDON**  
23 Heddon Street  
London W1B 4BQ

**BIRMINGHAM**  
Enterprise House 115 Edmund Street  
Birmingham B3 2HU

**BOURNEMOUTH**  
Everdene House Deansleigh Road  
Bournemouth BH7 7DU

**TERENCE O'ROURKE**  
TELEPHONE  
020 3664 6755  
www.torltd.co.uk





- Site boundary
- 2.5km study area

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Figure 3: Topography

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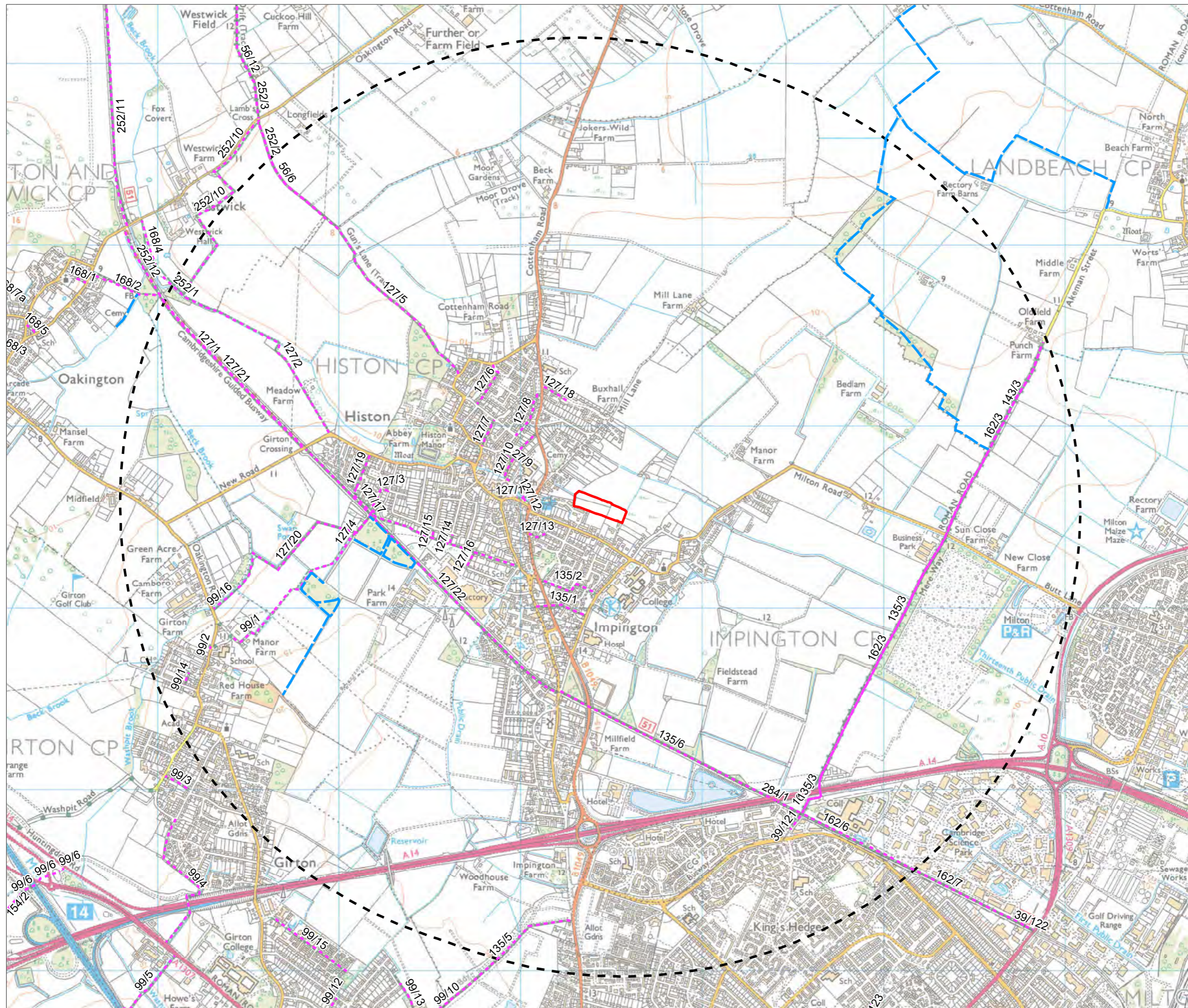
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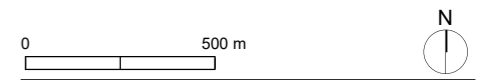
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Everdene House Deansleigh Road  
Bournemouth BH7 7DU

TELEPHONE  
020 3664 6755  
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- Site boundary
- 2.5km study area
- Footpath
- Permissive Footpath

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**Figure 4: Public rights of way**

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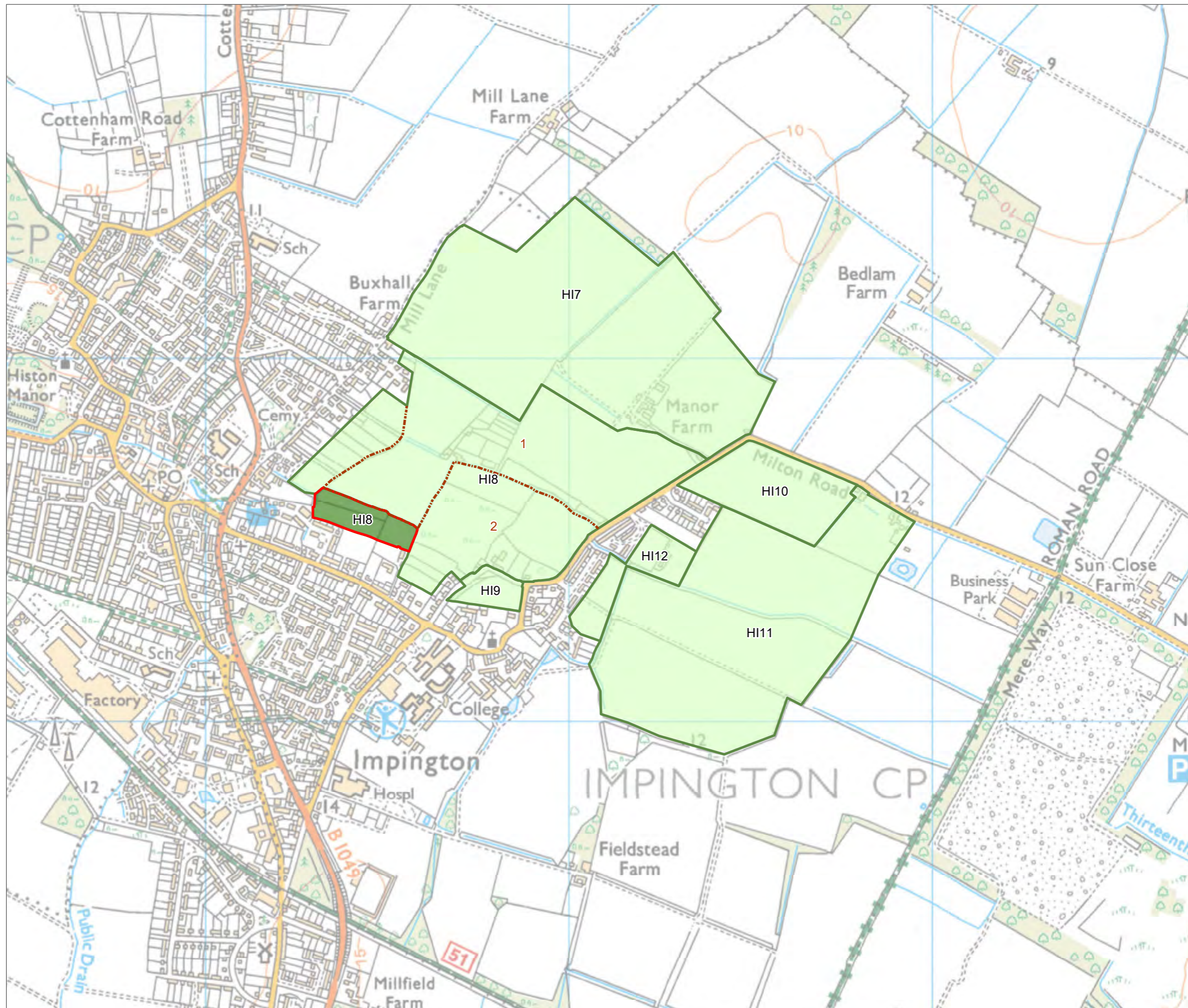
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Birmingham B3 2HJ

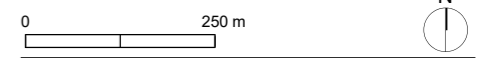
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Everdene House Deansleigh Road  
Bournemouth BH7 7DU

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- Site boundary
- LUC Green Belt parcels covering part/all of the site
- LUC Green Belt parcels around the site
- Harm scenario

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**Figure 5: LUC Green Belt parcels in relation to the Impington site**

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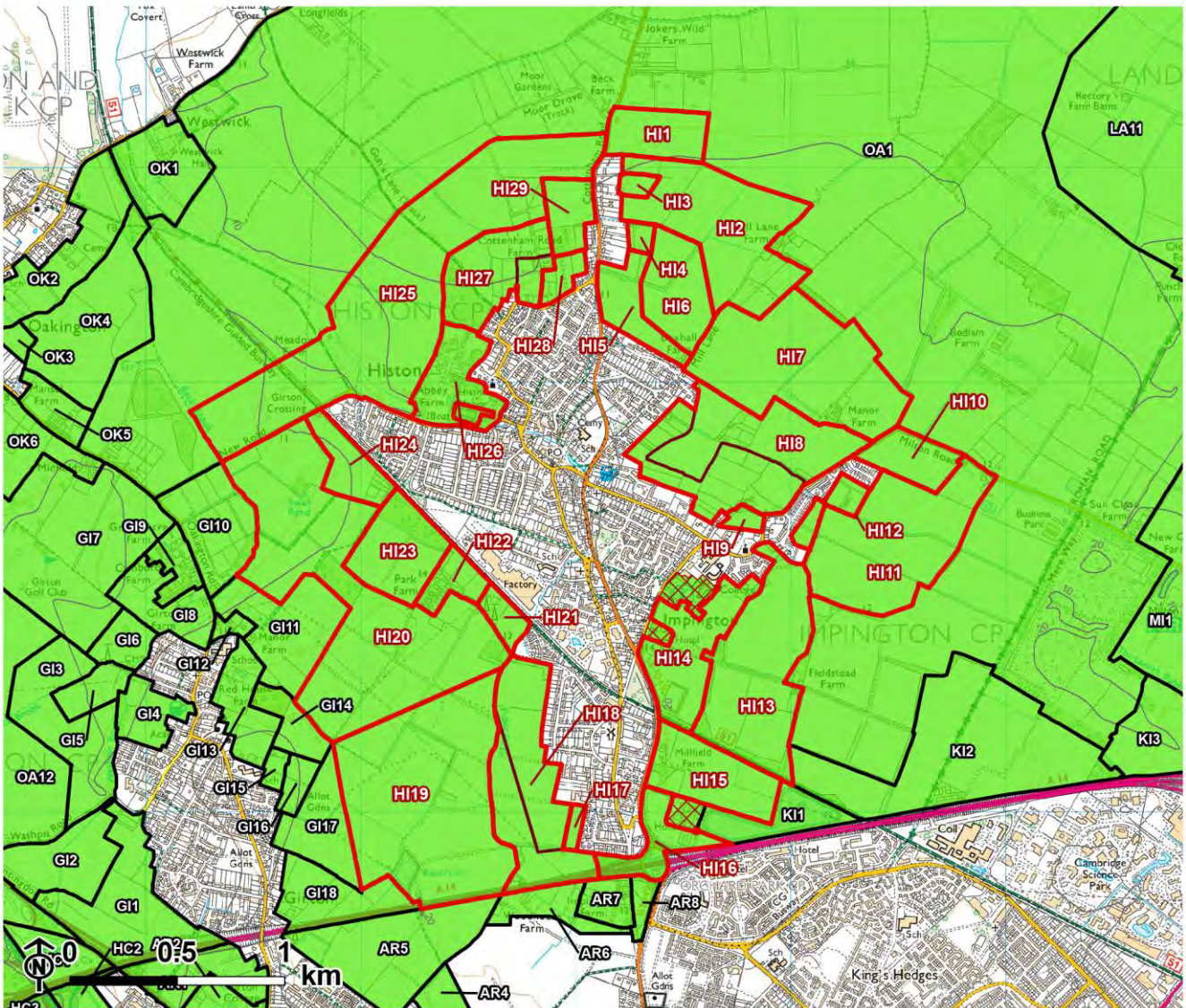
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Enterprise House 115 Edmund Street  
Birmingham B3 2HJ

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Everdene House Deansleigh Road  
Bournemouth BH7 7DU

TELEPHONE  
020 3664 6755  
www.torltd.co.uk

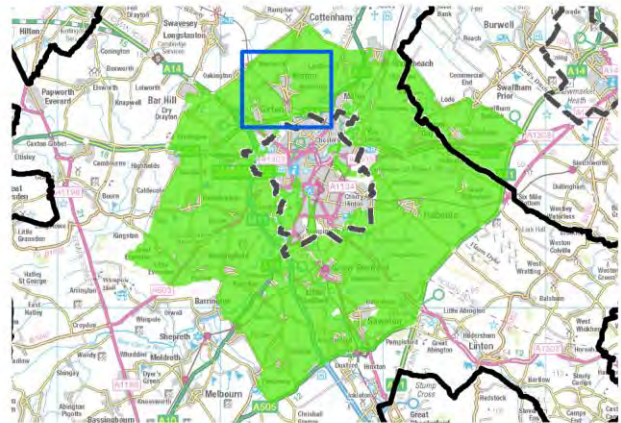
# Histon and Impington



- - - Local Authority boundary
- Histon and Impington parcel
- Division between parcel sub-areas
- Neighbouring parcel
- No openness
- Green Belt

## Absolute constraints

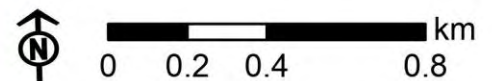
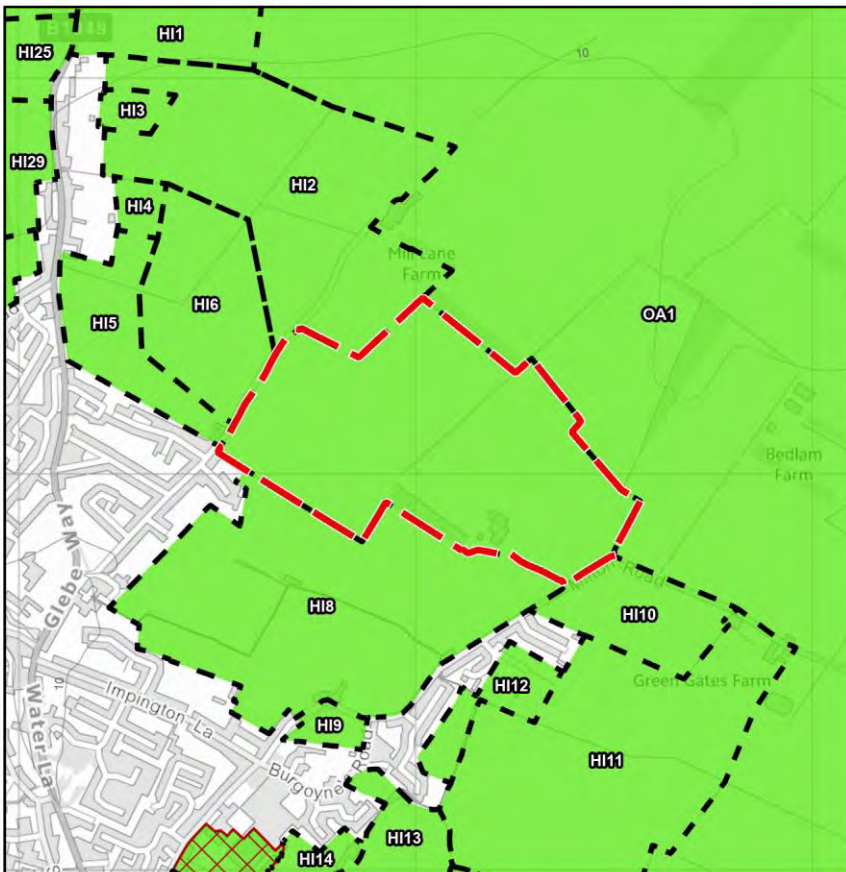
- Site of Special Scientific Interest
- Scheduled monument



# HI7



-  HI7
-  Neighbouring parcel
-  No openness
-  Green Belt



# HI7

## Parcel location and openness

Parcel size: 42.4ha

Arable farmland located to the northwest of Impington.

Land is open. There is no development of a scale, character or form that has an impact on Green Belt openness.

## Distinction between parcel and inset area

The garden boundaries of houses along Mill Lane create little boundary separation between the parcel and the inset settlement of Impington. However, land within the parcel is not contained by inset development and extends a significant distance from the inset area, and therefore there is no urbanising visual influence on the parcel. The arable farmland within the parcel creates little boundary separation between the parcel and the inset settlement of Impington. Overall there is strong distinction between the parcel and the inset area.

# HI7

## Contribution to the Green Belt purposes

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

Contribution: Relatively significant

Land is open and is adjacent to Impington, which is nearly contiguous with Cambridge but which retains some distinction from the main City area. There is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as diminishing Cambridge's compact character. Overall, the parcel makes a relatively significant contribution to Cambridge Purpose 1.

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

Contribution: Moderate

Land does not form or contain any specific features/aspects that contribute to the quality of Cambridge's setting, but it is open farmland that has a strong distinction from the edge of Impington. Its rural character therefore contributes to the quality of Cambridge's setting. Overall the parcel makes a moderate contribution to Cambridge Purpose 2.

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

Contribution: Moderate

Land is open and lies in a wide gap between Histon/Impington and Landbeach. 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 moderate contribution to Cambridge Purpose 3.

# HI7

## Impact on contribution of adjacent Green Belt

- Release of land as an expansion of Impington:

Rating: Minor-moderate

The absence of alternative Green Belt boundary features means that the release of land in this parcel would weaken the boundary separation between Impington and land to the north and east, as well as increase the urbanising visual impact on this land. In addition, release would reduce the wide settlement gap between Impington and Landbeach.

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

## Overall harm of Green Belt release

- Parcel HI7 makes a relatively significant contribution to preserving Cambridge's compact character and a moderate contribution to preventing communities in the environs of Cambridge from merging with one another, and 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 Impington, would be very high.

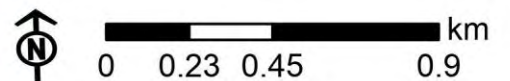
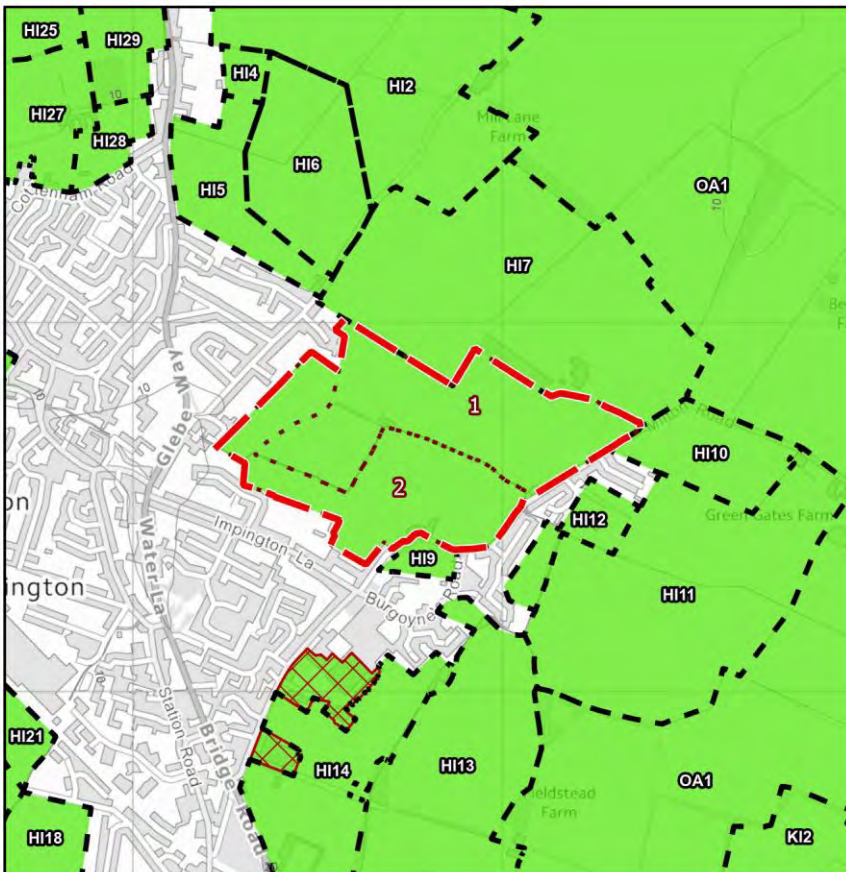
Very High



# HI8



-  HI8
-  Harm scenario
-  Neighbouring parcel
-  No openness
-  Green Belt



# HI8

## Parcel location and openness

Parcel size: 39.93ha

Fields, paddocks, scrub, wooded copses and gardens located to the east of Impington.

Land is open. There is no development of a scale, character or form that has a significant impact on Green Belt openness.

## Distinction between parcel and inset area

Milton Road is a moderate boundary feature between land in the east of the parcel and the inset village of Impington. However, the back gardens of houses to the south and west of the parcel create little boundary separation between the parcel and Impington. The parcel is largely contained by inset development, but the size of the area limits the urbanising influence, but there is some urbanising visual influence from the inset settlements to the south, east and west. The fields and paddocks that occupy the majority of the parcel do not create any additional distinction from Impington. Overall there is moderate distinction between the parcel and the urban area.

# HI8

## 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: Moderate

Land is open and is adjacent to Impington, which is nearly contiguous with Cambridge but which retains some distinction from the main City area. The parcel has some relationship with the urban area but also a degree of distinction from it. Overall the parcel makes a moderate 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 and woodland that has a moderate distinction from the edge of Impington, meaning it has some rural character. Land lies partly within and fronts directly onto Histon and Impington Conservation Area to the south and as such allows some appreciation of the rural character and setting of the more intact and historic parts of Impington (including Burgoyne's Road), which in turn contributes to the wider rural setting of Cambridge. 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 limited

Land is open and lies in a wide gap between Impington and Landbeach. The parcel has some relationship with the urban area but also a degree of distinction from it. Overall the parcel makes a relatively limited contribution to Cambridge Purpose 3.

# HI8

## Impact on contribution of adjacent Green Belt

- Release of land beyond the smaller hedged fields on the inset settlement edge (map areas 1 and 2), as an expansion of Impington:

Rating: Minor

Release of land within the parcel would increase the urbanising visual impact on land to the north.

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

- Release of land within the smaller hedged fields on the inset settlement edge (map area 2) as an expansion of Impington:

Rating: Negligible

Release of only the smaller hedged fields on the inset settlement edge would not increase the urbanising visual impact on land to the north of the parcel.

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

## Overall harm of Green Belt release

- Parcel HI8 makes a moderate contribution to preserving Cambridge's compact character and 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 land within the parcel extending beyond the smaller hedged fields on the inset settlement edge (map areas 1 and 2) would be minor. Therefore, the harm resulting from its release, as an expansion of Impington, would be moderate-high.

Moderate High

# HI8

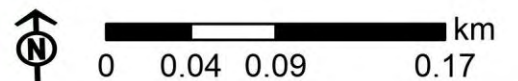
- The additional impact on the adjacent Green Belt of the release of only land within the smaller hedged fields on the inset settlement edge (map area 2) would be negligible. Therefore, the harm resulting from its release, as an expansion of Impington, would be moderate.

Moderate

# HI9



-  HI9
-  Neighbouring parcel
-  Green Belt



# HI9

## Parcel location and openness

Parcel size: 1.66ha

Amenity grassland contained by trees located on the northern edge of Impington.

Land is open. There is no development in the parcel.

## Distinction between parcel and inset area

The back gardens of houses to the south of the parcel create little boundary separation between the parcel and the inset village of Impington. Land is in close proximity to the inset area and is largely contained by inset development, and therefore there is some urbanising visual influence from the surrounding inset area on the parcel. The amenity grassland within the parcel does not create any additional distinction from Impington. Overall there is weak distinction between the parcel and the inset area.

# HI9

## Contribution to the Green Belt purposes

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

Contribution: Relatively limited

Land is open and adjacent to Impington, which is nearly contiguous with Cambridge but which retains some distinction from the main City area.

There is weak distinction between the parcel and the inset area, which reduces the extent to which development would be perceived as diminishing Cambridge's compact character. Overall, the parcel makes a relatively limited 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 and woodland that has a weak distinction from the edge of Impington, meaning it has some rural character. Land lies partly within and fronts directly onto Histon and Impington Conservation Area to the south and as such allows some appreciation of the rural character and setting of the more intact and historic parts of Impington (including Burgoyne's Road), which in turn contributes to the wider rural setting of Cambridge. 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: Limited/No contribution

Land is too closely contained by the settlement of Impington to contribute to its separation from any other settlement. The parcel makes no contribution to Cambridge Purpose 3.



# HI9

## Impact on contribution of adjacent Green Belt

- Release of land as an expansion of Impington:

Rating: Negligible

Due to the containment of the parcel by urbanising development and tree cover, release of the parcel would not impact the contribution of adjacent land to the north to the Green Belt purposes.

## Overall harm of Green Belt release

- Parcel HI9 makes a moderate contribution to maintaining and enhancing the quality of Cambridge's setting and a relatively limited contribution to preserving Cambridge's compact character. The additional impact on the adjacent Green Belt of the release of the parcel would be negligible. Therefore, the harm resulting from its release, as an expansion of Impington, would be low.

Low

**Turley Office**  
8 Quay Court  
Colliers Lane  
Stow-cum-Quy  
Cambridge  
CB25 9AU

T 01223 810990