

**Land East of Cambridge Road,  
Hardwick**  
Green Belt Review

Hill Residential Ltd & Chivers Farm  
(Hardington) LLP  
March 2025

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Issue / revision	Prepared by N M Edmonds
Reference 239105	Signature
This document is issued for  <input type="checkbox"/> Information <input type="checkbox"/> Approval <input type="checkbox"/> Comment <input type="checkbox"/> Submission	Date
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## **1.0 Introduction**

- 1.1 This representation has been prepared on behalf of Hill Residential Ltd and Chivers Farm (Hardington) LLP and reviews the Greater Cambridge Green Belt Assessment (2021) prepared by LUC on behalf of Greater Cambridge Partnership, GCP.
- 1.2 The site at Hardwick was originally visited in March 2019 to prepare a photographic survey and carry out some initial landscape and visual analysis. The information gathered was then incorporated within a visioning document which together with a preliminary Green Belt appraisal was issued as local plan representations in March 2019.
- 1.3 A further review of the site and its contribution to greenbelt purposes has been carried out in February 2025 in light of recent changes to the NPPF and Greenbelt policy in December 2024.
- 1.4 The purpose of this representation is to update and further substantiate the original promotional material submitted in 2019 in relation to land east of Cambridge Road, Hardwick.

### **The site location**

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

### **Report structure**

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

## 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, 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 in 2021. Unlike previous Green Belt assessments undertaken by both authorities, this assessment covers the entire Cambridge Green Belt 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.
- 2.3 In December 2024, the government published revisions to the NPPF including policies relating to greenbelt. Importantly, the requirement for LPAs to review Green Belt boundaries if they cannot meet their identified housing need has been restored. This need must be met 'in full', unless there is clear evidence that such alterations would fundamentally undermine the function of the Green Belt across the area of the plan 'as a whole'.
- 2.4 To justify the release of greenbelt, exceptional circumstances are still required to be demonstrated, but the proposed changes clarify that an authority's inability to meet its identified need for housing, commercial or other development through other means are included within such circumstances.
- 2.5 Any land released from the Green Belt will be required to provide 50% affordable homes (subject to viability), including a proportion of social rent, necessary improvements to local or national infrastructure and the provision of new (or improvements to existing) green spaces that are accessible to the public.
- 2.6 The revised NPPF also states that when releasing land from the Green Belt, first consideration should be given to previously developed land in sustainable locations and then 'Grey Belt' land (see below) in sustainable locations.
- 2.7 Development on Grey Belt land that can also deliver affordable housing, greenspaces and necessary improvements to infrastructure should not be regarded as 'inappropriate development' where local planning authorities cannot demonstrate a five year supply of deliverable housing sites or where the delivery of housing is below 75% of the housing requirement over the previous three years. This removes the need for 'very special circumstances' to be demonstrated.
- 2.8 The revised NPPF also introduces the principle of 'Grey Belt' whereby *'land in the green belt comprising previously developed land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (but excluding those areas or assets with particular importance).'*

- 2.9 'Grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. The three of the five purposes of green belt mentioned within the definition are:
- a) to check the unrestricted sprawl of large built-up areas
  - b) to prevent neighbouring towns merging into one another
  - d) to preserve the setting and special character of historic towns

### **General commentary on LUC methodology**

- 2.10 Broadly, the methodology and stepped stages used by LUC are relatively logical and take account of recent case law and accepted guidance. However, whilst their document states in paragraph 1.3 that it is "*robust and transparent...*" 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 not entirely transparent.
- 2.11 For this reason, it bears little similarity to other LUC's 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.
- 2.12 Summarised below are the areas of the assessment methodology which we believe should be re-considered to ensure that the assessment is entirely robust, transparent and yields the most objective and balanced and yields the most balanced conclusions.

### **Identification of parcels**

- 2.13 Rather than considering pre-defined boundaries, parcels have been 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 overlayed 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.
- 2.14 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”*

- 2.15 In February 2025 the government published The Green Belt PPG which provides additional guidance on how contribution to Green Belt purposes should be assessed. The new guidance is incredibly helpful as it seeks to standardise assessment categorisation and methodology where in the past this has been missing.
- 2.16 It is anticipated that Greater Cambridge Partnership will provide an update to the Greenbelt Assessment produced in 2021, in line with the requirements of this recent guidance. It is understood that the government expects all local planning authorities to adopt the criteria and align its categories with those outlined. All local planning authorities reviewing green belt boundaries are also required to identify where land is grey belt, dividing their green belt into separate assessment areas for the purpose of identifying grey belt.
- 2.17 There are two clear and fundamental implications for the assessment of greenbelt in Greater Cambridge. Firstly, GCP will be required to assess each parcel against national purposes (i.e not only local Cambridge Greenbelt purposes). Secondly, the assessment criteria laid down in the LUC assessment do not align with the criteria outlined in the new national guidance. Where the criteria do not align and where relevant to the Hardwick site, further comments are provided below where we believe this should be factored in to any future assessment.

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

- 2.18 In assessing the relevance of each Green Belt purpose, a series of considerations are provided. With regards to Cambridge purpose 3, paragraphs 3.31-3.35 provide a set of criteria to define the role the gap between settlements performs.
- 2.19 Criteria provided in paragraphs 3.31-3.35 imply that inset settlements that are 2-2.5km apart should be considered as being separated by a moderate gap. Fundamentally, a gap of this distance should be considered a wide gap.

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

- 2.20 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.”*
- 2.21 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.
- 2.22 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.

- 2.23 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.
- 2.24 Therefore, the test is whether the visual impacts on openness are so obviously material as to require direct consideration. In other words, if a site is well constrained and views of the proposals are limited so as not to be obviously material then the effect on openness must be considered as being limited/reduced.

**Step 3: Identify variations in distinction**

- 2.25 While the criteria in relation to how distinct a parcel is are overly complex, the categorisation and methodology are broadly supported.

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

- 2.26 This step provides the actual criteria for assessing the contribution a parcel makes to Cambridge Green Belt purposes 1, 2 and 3 on tables 3.2, 3.3 and 3.4. This is discussed in greater detail in stage 2.
- 2.27 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**

- 2.28 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)*

- 2.29 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.
- 2.30 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**

- 2.31 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)

- 2.32 As above, this implies that releasing part of a parcel for a small scale developemnt 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.

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

#### Introduction

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

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

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

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

Table 3.1, Hardwick LUC Green Belt assessment

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

#### Parcel definition

- 3.6 One of the criticisms with the LUC assessment is that no information is provided in the assessment of the individual parcels that explains how the parcel boundaries are defined. The hedgerow line has been used to define parcel HA5. Woodland and hedgerows define the western, southern and eastern

boundaries of parcel HA8. With parcel HA4, St Neots Road has been used for the northern boundary and the same hedgerow as parcel HA8 for its eastern boundary.

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

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

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

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

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

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

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

- 3.20 In regards to this Green Belt purpose the parcels on and around the Hardwick site are not close enough to the main urban area of Cambridge and therefore

make no contribution to this purpose. We therefore agree with LUC that the Hardwick site does not contribute to Cambridge Green Belt purpose 1.

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

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

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

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

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

- 3.27 Parcel HA4 is assessed as being in a moderate gap between Hardwick and Coton and Madingley which, together with the sloping landform and tree belts, maintains separation. Because the parcel is assessed as having a strong distinction with Hardwick it this increases the extent to which development would be perceived as narrowing the gap. Therefore, the parcel is assessed as making a relatively significant contribution to purpose 3.
- 3.28 In these terms, it is the criteria used by LUC to identify the grade of gap each parcel that are yielding skewed results. As there is a 5km distance from the western edge of Cambridge and approximately 2 to 2.5km from the nearest villages of Coton, Comberton and Madingley, we do not support the assessment that the gap should be considered as moderate or that development of the Hardwick site would narrow the perceived gap. In distance terms, the existing settlement gaps are very significant.

- 3.29 Inconsistently, parcel HA5 is assessed as being within a wide gap between the villages of Hardwick and Coton, with significant separating features including sloping ground levels and tree belts. The parcel has some relationship with Hardwick and a degree of distinction from it. This parcel is assessed as providing a relatively limited contribution to purpose 3.
- 3.30 Assessing the Hardwick site area separately (areas HA4-A and HA4-B) this land parcel is part of a robust/wide gap, comparable to parcel HA5 directly to the south. Equally, in accounting for the urbanising influences created from the visible residential edge of Hardwick and the residential development along St Neots Road and the traffic noise from the A428, then HA4-A and B should be assessed as having a moderate distinction from Hardwick. In view of this we consider that areas HA4-A and HA4-B fall most closely into the following criteria provided by LUC in their table 3.4 for the assessment of this purpose, which states:

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

- 3.31 Furthermore, the recent guidance states that, in relation to national greenbelt purpose B (prevent neighbouring towns merging into one another, equivalent to Cambridge Purpose 3) a moderate (not strong) contribution would be *“being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation”*. A weak contribution are defined as those areas that *“form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation.”*
- 3.32 Most importantly, however, this purpose is intended to apply to towns only, not villages and so we believe that parcels HA4A / B as described make no contribution to purpose 3. In these terms, the site would constitute a small part of a gap between *villages only* and could be developed without loss of visual separation.

### **Parcel HA8**

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

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

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

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

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

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

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

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

**Table 3.2, Re-assessment of the Hardwick site**

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

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

## Conclusions

- 4.1 This study finds that The Hardwick site's contribution to both Cambridge Green Belt purposes 2 and 3 is relatively limited. While the LUC assessment considers that the impact on the adjacent Green Belt land will not be reduced through mitigation and that development of parcel HA4 would weaken the moderate gap, we disagree that the gap is moderate when looking only at land within the Hardwick site boundary. Furthermore, we disagree that the mitigation described above would not have the effect to reduce this impact, especially, once established.
- 4.2 LUC assessed the overall harm of releasing parcel HA4 from Green Belt as creating high harm. However, in using the LUC criteria to re-assess the harm the Hardwick site would create if released from Green Belt then we consider it falls within the moderate harm category, two levels of harm lower than LUC's assessment for the whole of parcel HA4. Again, we feel that in creating a new woodland edge that could become a new strong defensible Green Belt boundary, that this mitigation would assist in reducing the harm further should the Hardwick site be released from Green Belt.
- 4.3 In conclusion, the Hardwick site does not contribute to the Cambridge Green Belt purpose 1 and provides only a relatively limited contribution for Cambridge Green Belt purposes 2 and 3 (equivalent to national purposes b and d).
- 4.4 In terms of encroachment (national purpose c), we would point to the recent national guidance. The guidance states that the intended purpose of greenbelt is to check the unrestricted sprawl of large built up areas and therefore not villages, which are not to be considered to be "large built up areas". An example of a strong contribution would be where for example, if developed, it would "result in an incongruous pattern of development (such as an extended "finger" of development into the Green Belt)".
- 4.5 The site lies in close proximity to the village centre, maintains the strong nucleated pattern of the settlement and so minimises the potential for sprawl. We believe, therefore, that due to the degree which it is associated with the existing settlement, we consider that the site makes a weak contribution to Green Belt Purpose A of the National Planning Policy Framework (paragraph 143), to check unrestricted sprawl.
- 4.6 Importantly, the recently published PPG makes it clear that it may still be possible for authorities to provisionally identify land as grey belt in advance of more detailed specific proposals. This is relevant where a finer grain assessment of a smaller site (or small developable area of a much larger parcel) would not result in harm to the remaining greenbelt where adequate provisions for strong defensible boundaries and compensatory measures could be incorporated.



- 4.7 The original village of Hardwick, now protected as a conservation area, is located to the south west of the Hardwick site. Since the 1960's Hardwick has expanded incrementally and more than doubled in size in the 1970's when Limes Estate was built. This growth has focused to the north and north west of the historic core creating unbalanced growth and the loss of the nucleated form of the historic settlement.
- 4.8 Development of the Hardwick site will redress this balance. The village's primary school is located on the settlement's edge as are its sports fields. Local amenities, as a result, are limited and also located around the periphery of the village (along Cambridge Road and St Neots Road). Hardwick has an overall deficit of open space.
- 4.9 Retail units are also dispersed over a large area rather than within a centralised and concentrated hub, meaning that the village currently lacks a unified heart.
- 4.10 The Hardwick site is uniquely located to assist in restoring the village core with the creation of a new local centre containing retail, employment space, community centre and health care facilities. It also has the ability to integrate the isolated line of residential development along St Neots Road into the village.
- 4.11 In terms of visual openness of the Hardwick site, the local pattern of topography, vegetation and development limits the extent to which development of the Hardwick site would be visible in the landscape, and where views are possible they would be largely restricted to locations within 1km of the Hardwick site boundary. Although a small number of views are available from the wider landscape, it was determined that, where they occur, the pattern of landform and landscape structure, or viewing distance itself, significantly reduces the degree of visual effect.
- 4.12 Inter-visibility with the Hardwick site is limited to two adjacent public roads / residential streets and a small number of locations on three public rights of way directly to the south of the Hardwick site, within 0.8km of the boundary. The Hardwick site has a broad and gentle south westerly aspect, falling more steeply towards the southern boundary. We understand that it is this slope that is most exposed to views from these locations.
- 4.13 The masterplan has taken due consideration of this landform by excluding development from this area. Wide areas of native woodland structure planting have been incorporated along these slopes to the north of Bin Brook and continued this wide woodland belt along the Hardwick site's eastern boundary, again widening to the rear of the properties along St Neots Road. The remaining sloping part of the Hardwick site provides new areas for open space and the location for attenuation basins. Actual built development is located on the plateau, level with the rest of Hardwick.



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