



**Ambrose Way,
Impington**

Green Belt Appraisal

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
Martin Grant Homes

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Section 1 Introduction

- 1.1 The Environmental Dimension Partnership (EDP) Ltd has been appointed by Martin Grant Homes (MGH) to undertake a Green Belt (GB) Appraisal to inform potential residential development on land at Ambrose Way, Impington (hereafter referred to as 'the site'), located within South Cambridgeshire District Council (SCDC).
- 1.2 EDP were first appointed in October 2021 and have been asked to update this appraisal in light of recent decisions at Inquiry and the new National Planning Policy Framework December 2024, updated 07 February 2025¹ (NPPF 2024).
- 1.3 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham, and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute⁽²⁾ specialising in the assessment of the effects of proposed development on the landscape.
- 1.4 The proposals are for a development of up to 177 dwellings, open space, play space, landscaping and associated infrastructure.
- 1.5 The site is located at the northern edge of the merged settlements of Histon and Impington and falls within the SCDC Local Planning Authority (LPA), as illustrated on **Plan EDP GB1** and **Image EDP 1.1**. The site extends to 8.71 hectares (ha) and is situated entirely within the Cambridgeshire GB, which washes over most of the site context, as illustrated by **Plan EDP GB1**.

¹ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf
accessed 19.02.25

² LI Practice Number 1010



Image EDP 1.1: Aerial view of the site.

Purpose and Structure of this Green Belt Appraisal

- 1.6 The purpose of this GB Appraisal is to test whether bringing forward sustainable development on this site would allow the key purposes of the GB, in the context of the wider merged settlements of Histon and Impington, to be maintained, or possibly even enhanced.
- 1.7 In undertaking the assessment EDP has:
- Reviewed relevant policy and background documents, in **Section 2**;
 - Assessed the existing (baseline) landscape character and visual context of the site and its setting, within the Preliminary Landscape and Visual Appraisal (PLVA; edp5518_r002), which, for the sake of brevity, has not been repeated here but is summarised in **Section 3**;
 - Undertaken a review of Cambridge GB studies at **Section 4**, and a detailed appraisal of the Greater Cambridge GB Assessment Final Report, South Cambridgeshire District Council and Cambridge City Council (LUC, August 2021)³ (GCGBA) in relation to the site, at **Section 5**;
 - Undertaken an assessment of the site's contribution to GB purposes at **Section 6**;

³ <https://www.scambs.gov.uk/media/19120/cd512-greater-cambridge-green-belt-assessment-excerpts.pdf>
accessed 07.10.24

- Considered whether the release of the site would be found 'not inappropriate' in the light of the NPPF 2024, at **Section 7**; and
- Reached overall conclusions in **Section 8**.

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Section 2

Policy Context and Other Considerations

National Policy

National Planning Policy Framework

2.1 The NPPF 2024 makes several references to GB of relevance to this report as noted below.

2.2 Section 2: Achieving sustainable development, paragraph 11, states that (emphasis added by EDP):

“Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that: ...

b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area [note 7]; or*

ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

[note 7]: The policies referred to are those in this Framework (rather than those in development plans) relating to: ... land designated as Green Belt.”

2.3 Section 13: Protecting GB land, paragraph 142, sets out the ‘fundamental aim’ and ‘essential characteristics’ of GB stating that (emphasis added by edp):

“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

2.4 Section 13 paragraph 143 sets out the five purposes of GB stating that:

“Green Belt serves the following five purposes [letters a-e replaced by numbering by edp for ease of reference]:

1. *to check the unrestricted sprawl of large built-up areas;*
2. *to prevent neighbouring towns merging into one another;*

3. *to assist in safeguarding the countryside from encroachment;*
4. *to preserve the setting and special character of historic towns; and*
5. *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

- 2.5 Paragraphs 145 and 146 relate to alteration of GB boundaries stating that (emphasis added by EDP):

"145. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. ...

146. Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan."

- 2.6 The NPPF 2024 sets out considerations in relation to proposals affecting the GB at paragraphs 153 to 106

- 2.7 Paragraph 153 relates to harm due to inappropriate development in the GB stating that (emphasis added by edp):

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness [note 55]. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

[note 55] Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate."

- 2.8 Paragraph 154 clarifies the meaning of inappropriate development stating (emphasis added by edp):

"Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- e) limited infilling in villages; ... and*

- g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt."

2.9 Paragraph 155 provides further clarification of inappropriate development (emphasis added by edp):

"The development of homes, ... in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. *There is a demonstrable unmet need for the type of development proposed [note 56];*
- c. *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. *Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.*

[note 56] *Which, in the case of applications involving the provision of housing, means the lack of a five year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years;"*

2.10 Paragraph 156 sets out the golden rules referenced in paragraph 155 stating (emphasis added by edp):

"Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review [note 58], or on sites in the Green Belt subject to a planning application [note 59], the following contributions ('Golden Rules') should be made:

- a. *affordable housing ...;*
- b. *necessary improvements to local or national infrastructure; and*
- c. *the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.*

159. The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.”

2.11 Annex 2: Glossary defines Grey belt as:

“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 (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).”

Summary of NPPF 2024 in Relation to GB

2.12 In summary, the NPPF 2024 allows that development in GB will no longer be limited to ‘exceptional circumstances’; in contrast development in the GB should be regarded as appropriate where:

- The local planning authority cannot demonstrate that it ‘can meet its identified need for homes, commercial or other development through other means’;
- The development:
 - Would not ‘fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan’;
 - Would utilise ‘previously developed’ or ‘grey belt’ land in sustainable locations;
 - Would provide the contributions set out in NPPF 2024 paragraph 156, as summarised below; and
 - Would comprise ‘limited infilling’, which would not cause ‘substantial harm to the openness of the GB’.

2.13 Grey belt land is defined as “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 (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).”

2.14 The contributions set out in NPPF 2024 paragraph 156 require that where ‘major development’ (which is undefined) takes place on land which has been released from the GB contributions should be made with respect provision of: social housing (on residential schemes): national infrastructure; and quality and accessibility to green spaces.

2.15 No guidance is provided regarding how to judge whether land makes a limited contribution to the GB purposes, however, government thinking in this regard is illuminated, to some degree, by its consultation prior to publication of NPPF 2024, which proposed incorporating the following into the glossary appended to the NPPF:

“Land which makes a limited contribution to the Green Belt purposes will:

- a) Not strongly perform against any Green Belt purpose; and*
- b) Have at least one of the following features:*
 - i. Land containing substantial built development or which is fully enclosed by built form*
 - ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another*
 - iii. Land which is dominated by urban land uses, including physical developments*
 - iv. Land which contributes little to preserving the setting and special character of historic towns.”*

Planning Practice Guidance

2.16 National Planning Practice Guidance (NPPG) Green Belt (published July 2019, last updated December 2023)⁶ sets out advice on the role of the GB in the planning system. It identifies a number of matters which may need to be taken into account in assessing the impact of a proposal on the openness of the GB. These factors are cited within the GCBA and included below:

“Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*

⁶ <https://www.gov.uk/guidance/green-belt> accessed 13.10.24

- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.”⁷*

Planning Advisory Service Guidance

- 2.17 As stated in the GCGBA “Neither the NPPF nor NPPG provide guidance on how to undertake Green Belt studies. However, the Planning Advisory Service (PAS) published an advice note [see GCGBA reference 5] in 2015 that discusses some of the key issues associated with assessing the Green Belt. Reference to the PAS guidance is included in the Methodology section in Chapter 3 where relevant.” (GCGBA para 2.14).

Local Policy

South Cambridgeshire Local Plan

- 2.18 The South Cambridgeshire Local Plan was adopted in September 2018 and contains the following policies of relevance to GB:
- Policy S/2 ‘Objectives of the Local Plan’;
 - Policy S/4 ‘Cambridge GB’; and
 - Policy NH/8 ‘Mitigating the Impact of Development’ in and adjoining the GB, is partly relevant where it applies to development of land at the edge of settlements, surrounded by the designation. This would be the resulting case to re-drawing the GB boundary to align with the edge of the site.
- 2.19 Policy S/2 ‘Objectives of the Local Plan’ states that: “*The vision for the Local Plan will be secured through the achievement of 6 key objectives*” including “*b. To protect the character of South Cambridgeshire, including its built and natural heritage, as well as protecting the Cambridge Green Belt. New development should enhance the area, and protect and enhance biodiversity.*”
- 2.20 Policy S/4 ‘Cambridge GB’ states that “*A Green Belt will be maintained around Cambridge that will define the extent of the urban area.*”
- 2.21 In the lower-case text relating to Policy S/4 the Local Plan lists the purposes of the Cambridge GB (paragraph 2.30) as being to:
- “*Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*

⁷ NPPG Green Belt Paragraph: 001 Reference ID: 64-001-20190722 Revision date: 22 07 2019

- *Maintain and enhance the quality of its setting; and*
- *Prevent communities in the environs of Cambridge from merging into one another and with the city.”*

2.22 The Local Plan lower-case text continues, at paragraph 2.31, to identify a “*number of factors [that] define the special character of Cambridge and it’s setting, which include*

- *Key views of Cambridge from the surrounding countryside;*
- *A soft green edge to the city;*
- *A distinctive urban edge;*
- *Green corridors penetrating into the city;*
- *Designated sites and other features contributing positively to the character of the landscape setting;*
- *The distribution, physical separation, setting, scale and character of Green Belt villages; and*
- *A landscape that retains a strong rural character.”*

2.23 Local Plan lower-case text at paragraph 2.34 states that, in addition to land identified for release for development by the Inner Green Belt Review 2012 and the Inner Green Belt Review 2015:

“...land is released from the Green Belt at Sawston, Impington and Comberton (Policy H/1) to meet the overall need for housing and to provide a flexible and responsive package of sites that will best meet identified needs.”

2.24 This is of relevance here as this area is located at the northern settlement edge just to the south of the site. This parcel of land was assessed in 2011 and considered appropriate to remove from GB for residential development. In relation to this site the Council’s hearing statement⁸ Appendix 3⁹, page 98 states:

“Although currently in the Green Belt, the site is capable of integrating development into the village with minimal impacts to the historic and natural environment, landscape and townscape through careful design.”

⁸ Planning Statement, Land North of Impington Lane, Impington, April 2018 prepared by Beacon Planning

⁹ Examination into the Soundness of the South Cambridgeshire Local Plan, Matter SC1 – Strategy for the Rural Area, South Cambridgeshire District Council, May 2017. (Page 98, Paragraph 451)

Emerging Local Policy

2.25 Emerging Policy is set out in the following documents:

- First Proposals: Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021)¹⁰; and the more recent;
- Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023¹¹.

2.26 Emerging policy of relevance here is Policy GP/GB: *Protection and Enhancement of the Cambridge GB*. The Plan sets out the proposed policy direction:

“National planning policy places great importance on Green Belt and sets out specific requirements for how planning proposals in these areas should be considered. New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework. The Greater Cambridge Local Plan will include the established local purposes of the Cambridge Green Belt, which are to:

- *preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
- *maintain and enhance the quality of its setting;*
- *prevent communities in the environs of Cambridge from merging into one another and with the city. Enhancement of the Green Belt, such as for recreation and biodiversity, will also be supported.”*

Other Relevant Considerations:

Histon and Impington Conservation Areas

2.27 The extent to which the site impacts on the historic setting to the heritage assets falls outside of the remit of this appraisal. However, an understanding of the historic features of the site and context is relevant to understanding the contribution that the site makes to NPPF 2024 GB Purpose 4 *“to preserve the setting and special character of historic towns”*/Cambridge Purpose 2 *“to maintain and enhance the quality of its setting”*.

2.28 As set out in the PLVA and illustrated at **Image EDP 2.1**, Histon and Impington St Andrews Conservation Areas (CA) fall to the west and south-east of the site, respectively. While Histon CA is separated from the site by intervening 20th century residential development Impington St Andrews is separated from it by intervening field boundary vegetation. In

¹⁰ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf> – accessed 17.10.24

¹¹ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2023-01/PDGCLPDSURReg18POJan23v1Jan23.pdf> – accessed 17.10.24

addition, there are a number of listed buildings within the centre of Histon and Impington, primarily within the CAs, and none have intervisibility with the site.

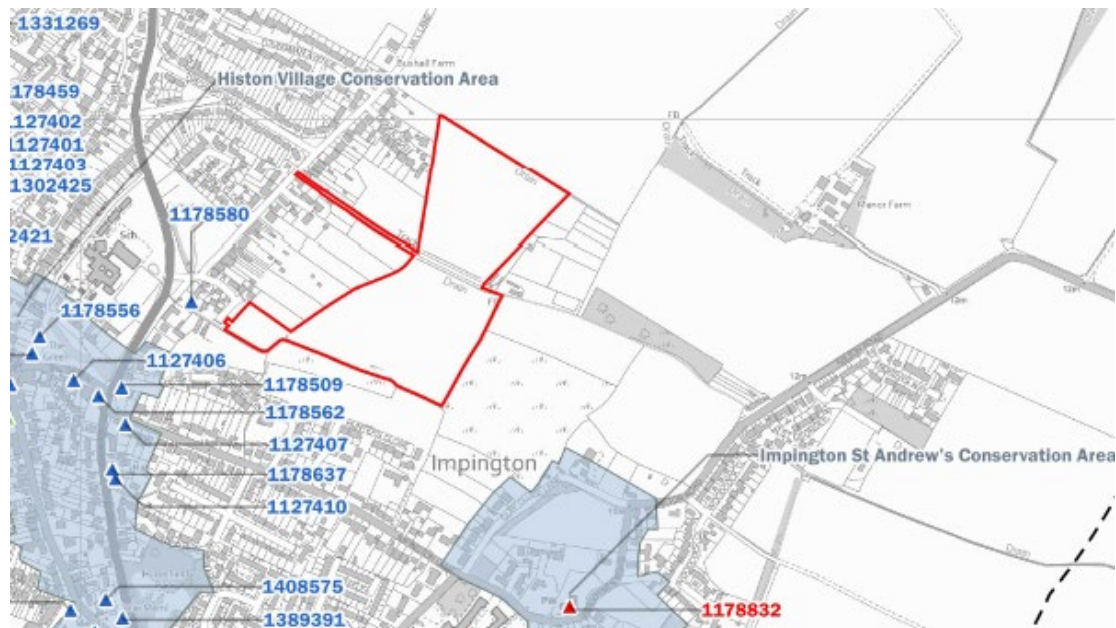


Image EDP 2.1: Designated Heritage Assets in the Site contact (extract of edp5518_d018).

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Section 3

Landscape Character and Visual Amenity

- 3.1 An understanding of the character and visual amenity of the site and context is relevant to understanding the contribution that the site makes to the purposes of the Cambridge GB as set out in the NPPF 2024 and the South Cambridgeshire Local Plan (adopted 2018).
- 3.2 A preliminary landscape and visual appraisal of this landscape has been undertaken in the PLVA and is reported here, in summary, for ease of reference.

Landscape Character

- 3.3 The PLVA undertakes a full review of published landscape character assessments, as listed below, and a desk and field-based appraisal of the character of the site and context.
- National Character Area (NCA) 88: Bedfordshire and Cambridgeshire Claylands¹²;
 - Greater Cambridge Landscape Character Assessment (CBA 2021)¹³;
 - District Design Guide: High Quality and Sustainable Development in South Cambridgeshire SPD (adopted March 2010)¹⁴; and
 - Histon and Impington Village Design Guide SPD (September 2020)¹⁵.
- 3.4 The PLVA finds that, in some respects, the landscape north of Histon and Impington is consistent with GCLCA landscape description in that it comprises a low-lying, gently undulating agricultural landscape with a large-scale, open field system of predominantly arable farmland across the wider area and a small-scale pastoral field pattern around the settlement edge, defined by a hierarchy of drains, ditches and lodes. Across the wider landscape there is little vegetation cover allowing for 'extensive vistas and large skies', however, hedgerows, shelterbelts and small clumps of trees create a distinctive, localised vegetation pattern, and more restricted visibility, in proximity to villages.
- 3.5 However, the published descriptions of the landscape beyond the settlement limit is broad scale and does not take into account the local influences. Notably, intervisibility with the existing settlement edge at Histon creates a settlement edge character across the site,

¹² <http://publications.naturalengland.org.uk/publication/5091147672190976?category=587130> - accessed 30.09.24

¹³ Part A - https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/LandscapeCharacterAssessment_GCLP_210831_Part_A.pdf - accessed 30.09.24
Part B - https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/LandscapeCharacterAssessment_GCLP_210831_Part_B.pdf - accessed 30.09.24

¹⁴ <https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/district-design-guide-spd> - accessed 13.10.24

¹⁵ <https://www.scambs.gov.uk/media/iqakco4l/histon-and-impington-village-design-guide-supplementary-planning-doc-2.pdf> - accessed 13.10.24

notably to the north and south-west where adjacent development is most apparent, and the wider context to the north-west of the site, which reduces with distance.

- 3.6 With regard to the GCLCA key characteristics of the “*Fen Edge villages*”, including Histon and Impington, the settlement edge in the vicinity of the site does demonstrate, in places, the characteristic ‘well wooded character, with hedgerows and mature trees concealing buildings’, notably to the south-west and south-east of the site, and ‘long back gardens’, notably to the north-west of the site.
- 3.7 However, while Histon and Impington may well have historically had ‘strong linear form, often having developed outwards from crossroads along approach roads’, contrary to the key characteristic this historic linear form has not been ‘retained despite the modern estate developments that have occurred in many of the villages’. Rather, this form has been largely lost at Histon and Impington due to new development and the resultant merging of the two settlements.
- 3.8 The Concept Masterplan retains and enhances existing mature vegetation along the site boundaries. In addition, it includes a landscape buffer along the northern boundary, to “*create a ‘soft’ transition between the village and countryside through landscaping and tree planting*”, which is sympathetic and characteristic and would ensure that the site is integrated with the wider landscape.
- 3.9 Further, the residential development of the site in accordance with the Concept Masterplan offers the opportunity to “*Enhance the setting of field drains inside the village so they can be better appreciated*”, as set out in the Histon and Impington Village Design Guide. Further, the Concept Masterplan shows how the site can “*provide new areas of natural green space*”.

Visual Amenity

- 3.10 The PLVA reports that EDP’s field assessment finds that the Zone of Primary Visibility (ZPV) for the development would be very limited with the proposal visually well contained by vegetation and settlement at and beyond the site boundary. The effect of the proposal is likely to be limited to the immediate context of the site including:
- Private agricultural land within some 750m from the site boundaries to the north-east; and
 - Residential properties and access roads within 300m of the site to the north-west, south-west and south-east.
- 3.11 Where apparent, views to the proposals would largely be limited to views over, or filtered by, site boundary vegetation. In addition, where apparent the site would generally be seen in the existing settlement context and would not appear out of character or incongruous.

- 3.12 The location and nature of the site means that residential development proposals in accordance with the Concept Masterplan present an opportunity to set proposed development within a suitable landscape framework. This will ensure that the site remains visually softened and connected with the eastern edge of Histon and the wider agricultural landscape to the north, while retaining views north from the western edge of Impington.

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Section 4

Review and Appraisal of the Cambridge Green Belt Studies

4.1 There have been several GB studies relevant to the site and context as listed below:

- The Cambridge Sub-Region Study (Colin Buchanan and Partners, September 2001)¹⁶;
- Inner Green Belt Study (CCC, 2002)¹⁷;
- Cambridge Green Belt Study: A Vision for the Future of Cambridge and its Green Belt Setting, Final Report (LDA, 2002)¹⁸;
- 2012 Appraisal of the Inner Green Belt, May 2012¹⁹;
- 2012 Inner Green Belt Boundary Study, December 2012²⁰;
- Cambridge Inner Green Belt Boundary Study (LDA Design, 2015)²¹; and
- Greater Cambridge Green Belt Assessment Final Report, South Cambridgeshire District Council and Cambridge City Council (LUC, August 2021) (LUC, August 2021)²² (GCGBA)

4.2 These studies provide the backdrop for the GCGBA, as set out in that report, they are of very limited direct relevance to the Site. Consequentially, for brevity, a review has been omitted here.

The Cambridge Sub-Region Study, 2001

4.3 The Cambridge Sub-Region Study (Colin Buchanan and Partners, September 2001) contains a Green Belt Review at Section 7, which established that the primary purposes of the GB as:

- *“Primary Purpose: To preserve the special character of Cambridge and to maintain the quality of its setting”*; and

¹⁶ <https://www.cambridge.gov.uk/media/2551/rd-strat-010.pdf> - accessed 13.10.24

¹⁷ <https://files.cambridge.gov.uk/public/ldf/coredocs/Inner%20Green%20Belt%20Boundary%20Study%202002%20pdf%20version%2024.4.05.pdf> - accessed 13.10.24

¹⁸ <https://www.scambs.gov.uk/media/7579/cambridge-green-belt-study.pdf> - accessed 13.10.24

¹⁹ <https://www.cambridge.gov.uk/media/2518/inner-green-belt-appraisal-2012.pdf> - accessed 13.10.24

²⁰ <https://www.cambridge.gov.uk/media/2519/inner-green-belt-boundary-study-december-2012.pdf> - accessed 13.10.24

²¹ Report - https://www.scambs.gov.uk/media/6596/a-cambridge-inner-green-belt-boundary-study_-main-report.pdf, Figures - <https://files.cambridge.gov.uk/public/ldf/coredocs/rd-mc-030-part2.pdf> - accessed 13.10.24

²² <https://www.scambs.gov.uk/media/19120/cd512-greater-cambridge-green-belt-assessment-excerpts.pdf> - accessed 13.10.24

- “Secondary Purpose: To prevent further coalescence of settlements”. (paragraph 7.2.7).

4.4 The Study goes onto to say that:

“Special Character, in addition to the City’s historic core and associated university colleges, comprises:

- *The green corridors and wedges connecting the city with the countryside; and*
- *The separation between settlements to ensure their clear identity.*

Setting comprises:

- *Views of the city; and*
- *The placement and character of villages surrounding the city and the interface between the city and the countryside” (paragraph. 7.2.8).*

4.5 The study identified a number of sites for further study. These were sites that did not possess characteristics that were recognised as being of particular importance to the GB.

Inner Green Belt Study, 2002

“This was an in-house working document produced by CCC, which informed the preparation of the 2006 Cambridge Local Plan, but was later made available to enable its inclusion as a Core Document for the Local Plan Inquiry. It assessed the importance of various sectors and parcels on the city edge to the purposes of the Green Belt, and then of the potential impact of developing these sites. It was carried out to assist specifically in identifying sites that could be released from Green Belt for development close to Cambridge without harm to the purposes of Green Belt or the setting of the City.

The results of the survey are set out in the Sector Tables within the report, although no accompanying plan is available (reference to ‘Plan X’ only within the report) showing where the sectors are located.”²³

Cambridge Green Belt Study: A Vision for the Future of Cambridge and its Green Belt Setting, 2002

4.6 The Cambridge Green Belt Study (LDA, September 2002) was undertaken to assess whether there was scope for urban expansion to the east of the city, without harming GB purposes.

²³ Greater Cambridge Green Belt Assessment Final Report, South Cambridgeshire District Council and Cambridge City Council (LUC, August 2021) paras 2.51-2.52

- 4.7 The methodology used in this study was based on the principles of landscape and visual assessment, then the Guidelines for Landscape and Visual Impact Assessment, 2nd Edition (The Landscape Institute and the Institute of Environmental Management and Assessment, 2002).
- 4.8 With its focus on the eastern sector of the Cambridge GB, the study excludes the area of the site and so is of limited relevance here. However, of broader relevance, it does identify a number of *“qualities that contribute positively to the setting and special character of Cambridge, and which are essential to the Green Belt purposes”* summarised as:
- *“A large historic core relative to the size of the city as a whole;*
 - *A city focussed on the historic core;*
 - *Short and/or characteristic approaches to Cambridge from the edge of the city;*
 - *A city of human scale easily crossed by foot and by bicycle;*
 - *Key views of Cambridge from the landscape;*
 - *Significant areas of distinctive and supportive townscape and landscape;*
 - *Topography providing a framework to Cambridge;*
 - *A soft green edge to the city;*
 - *Green fingers into the city;*
 - *Designated sites and areas enriching the setting of Cambridge;*
 - *Long distance footpaths and bridleways providing links between Cambridge and the open countryside;*
 - *Elements and features contributing positively to the character of the landscape setting;*
 - *The distribution, physical separation, setting, scale and character of necklace villages;*
 - *A city set in a landscape which retains a strong rural character”* (pages 2–3).

2012 Appraisal of the Inner Green Belt, May 2012

- 4.9 The Appraisal of the Inner Green Belt, 2012 undertakes a broad appraisal of the inner GB boundary areas in the context of the recent land releases and how those releases have affected the revised inner GB boundary.

4.10 As with the 2002 study, the methodology used was based on the principles of landscape and visual assessment, then the Guidelines for Landscape and Visual Impact Assessment, 2nd Edition, 2002.

4.11 The appraisal drew conclusions on broad zones of the city edge, which had more or less importance when measured against GB criteria. These broad zones exclude the site and so the appraisal is of limited relevance. However, of broader relevance, it found that:

“...areas where the City is viewed from higher ground or generally has open aspects, or where the urban edge is close to the city centre are more sensitive and cannot accommodate change easily. Areas of the City that have level views and where the edge has mixed foreground can accommodate change more easily. On a comparative basis these areas have a lesser importance to the setting of the City and to the purposes of Green Belt.

It should be noted that areas with a lesser importance are very limited and should be considered bearing in mind the value that is put on the City in its setting. Getting it wrong will have irreparable consequence on the historic City of Cambridge” (paragraphs. 5.5-5.6).

2012 Inner Green Belt Boundary Study, December 2012

4.12 The purpose of the Inner Green Belt Boundary Study, 2012 was to provide an up-to-date evidence base for both Councils’ new Local Plans at that time. It was to help the Councils reach a view on whether there are specific areas of land that could be considered for release from the GB and allocated for development to meet identified needs, without significant harm to GB purposes.

4.13 As with the 2002 and earlier 2012 studies the methodology used was based on the principles of landscape and visual assessment, then the Guidelines for Landscape and Visual Impact Assessment, 2nd Edition, 2002.

4.14 The area of study was confined to land on the edge of Cambridge and within any major physical barriers around Cambridge such as the M11 motorway to the west of the city and the A14 to the north. Land around the necklace villages, including Histon and Impington, are excluded so that the study is of limited relevance here.

4.15 However, of broader relevance, the examination of the emerging Local Plans was suspended in May 2015. The inspectors set out their preliminary conclusions in a letter dated 20 May 2015, stating that:

“...the two authorities have individually and jointly undertaken a review of the inner Green Belt boundary during the course of the plan preparation ... A number of respondents have questioned the methodology employed in the Green Belt Review and we have found it difficult, in some cases, to understand how the assessment of ‘importance to the Green Belt’ has been derived from underlying assessments of importance to setting, character and separation...”

- 4.16 In response to these comments Cambridge City Council (CCC) and SCDC commissioned LDA to undertake a further study of the inner GB in 2015.

Cambridge Inner Green Belt Boundary Study, 2015

- 4.17 Cambridge Inner Green Belt Boundary Study, 2015 was commissioned jointly by Cambridge City Council and South Cambridgeshire District Council following the suspension of the Examinations of their respective Local Plans in May 2015. The Study provides two pieces of work identified in the Examination:

- An assessment of the Inner GB Boundary; and
- A review of the methodologies put forward by objectors in relation to the Inner GB Boundary.

- 4.18 The Study assesses how land in the Inner Cambridge GB performs against both National GB purposes (with the exception of purpose 5) and Cambridge GB purposes, and considers whether there is potential to release land for development without significant harm to GB purposes. Sixteen qualities were identified and used as the criteria for the assessment. These qualities were identified and adapted from policy documents and previous studies (in particular the 2002 Cambridge Green Belt Study by LDA).

- 4.19 As with the 2012 study, the study area boundary was confined to land on the edge of Cambridge and excludes Histon and Impington, so that it is of limited relevance here. However, Histon and Impington and the site fall within the ‘Outer Rural Areas of the Green Belt’ in an area deemed to “*provide a broader rural context to Connective, Supportive and Distinctive areas of the city*”. The function of this landscape is “*in providing a backdrop to views of the city and in providing a setting for approaches to Connective, Supportive and Distinctive areas of townscape and landscape.*”

Greater Cambridge Green Belt Assessment Final Report, 2021

- 4.20 GCGBA (LUC, August 2021) provides an assessment of the performance of all GB land across the two districts, Cambridge City and South Cambridgeshire, which together form Greater Cambridge. The strategic GB Assessment forms part of the evidence informing the emerging Greater Cambridge Local Plan being prepared jointly by CCC and SCDC.

- 4.21 LUC scope of assessment finds that:

- Cambridge’s historic nature is the reason for the existence of its GB; and
- Assessment of the GB should be based on the three Cambridge GB purposes which should be considered an application of the NPPF 2024 GB purposes in the local context, rather than as additional purposes.

- 4.22 The three Cambridge GB purposes are listed below with the inter-relationship between Cambridge Purposes and NPPF 2024 Purposes set out in **Table EDP 4.1**:

1. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
2. Maintain and enhance the quality of its setting; and
3. Prevent communities in the environs of Cambridge from merging into one another and with the city.

Table EDP 4.1: Inter-relationship between Cambridge Purposes and NPPF 2024 Purposes

Cambridge Purpose	NPPF Purpose	Comment
1. Preserve the unique character of Cambridge as a compact, dynamic city, with thriving historic centre.	1. To check the unrestricted sprawl of large built-up areas.	Cambridge Purpose 1 deals with the compact nature of the city, and as such is directly related to the issue of urban sprawl, meaning that this purpose is directly related to the essence of NPPF Purpose 1.
2. Maintain and enhance the quality of its setting.	3. To assist in the safeguarding of the countryside from encroachment. 4. To preserve the setting and special character of historic towns.	Cambridge Purpose 2 is clearly related to NPPF Purpose 4, as noted above, but is also closely related to NPPF Purpose 3, owing to the strong rural character of Cambridge's setting. Whilst both NPPF Purpose 4 and 3 will be covered under Cambridge Purpose 2, NPPF Purpose 4 is given relatively more weight. This allows more meaningful variations in contribution and harm to be drawn out in the specific context of Cambridge.
4. Prevent communities in the environs of Cambridge from merging into one another and with the city.	2. To prevent neighbouring towns merging into one another.	Cambridge Purpose 3 is closely related to NPPF Purpose 2. However, the focus here is not on 'gaps' between towns specifically, but on the gaps between Cambridge and the surrounding necklace of villages and on the gaps between individual villages themselves – both these within the inner necklace and those more distant.

- 4.23 The study includes all land within the GB with land around the edge of the inset settlements divided into study parcels. The site and context fall within parcel HI8, as illustrated at **Image EDP 4.1**. This parcel is divided into sub-areas (also referred to as 'harm scenarios')

or 'map areas'); 1: further from the settlement; and 2: adjacent to the settlement. The site comprises less than approximately a third of the parcel with the main site area comprising the western extent of sub parcel 1 which is separate from the settlement edge. The small land parcel at the south-western site extent and the access track to the west of the site fall within the western extents of sub-parcel 2.



Image EDP 4.1: Parcel HI8 and sub-parcels 1 and 2 (GCGBA Appendix B Parcel HI8 extract).

4.24 Each parcel was then assessed in terms of:

- Parcel location and openness;
- Distinction between parcel and inset area;
- Contribution to the GB purposes;
- Impact on contribution of adjacent GB; and
- Overall harm of GB release.

4.25 The assessment of Parcel HI8 is included at **Appendix EDP 2**, with the results of the assessment summarised in **Table EDP 4.2** and **Image EDP 4.2**.

Table EDP 4.2: Green Belt Parcel HI8 Contribution to Harm Ratings (Extract of GCGBA Table 4.1)

Settlement	Parcel Ref.	Release Scenario	Area (ha)	P1 Contribution	P2 Contribution	P3 Contribution	Harm
Histon and Impington	HI8	Release of land beyond the smaller hedged fields on the inset settlement edge (map areas 1 and 2), as an expansion of Impington.	57.87	Moderate	Moderate	Relatively Limited	Moderate High
Histon and Impington	HI8	Release of land within the smaller hedged fields on the inset settlement edge (map area 2) as an expansion of Impington	17.94	Moderate	Moderate	Relatively limited	Moderate

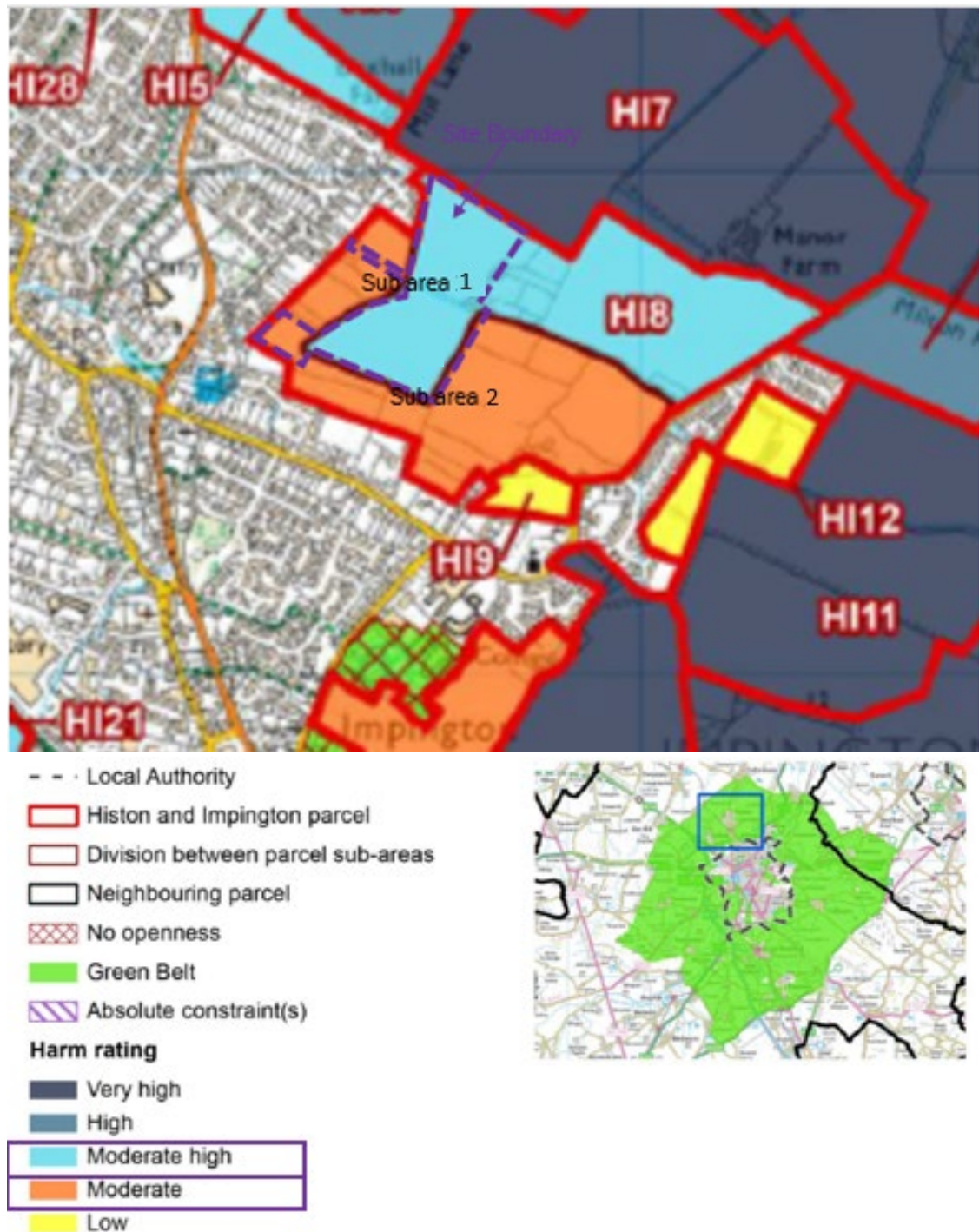


Image EDP 4.2: Harm Rating of Parcel H18 and sub parcels 1 and 2 (GCGBA Figure 4.4 extract).

4.26 The assessment finds that the contribution of area 1 and 2 of the parcel make the same contribution to:

- Purpose 1: Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre: Moderate;
- Purpose 2: Maintain and enhance the quality of its setting: Moderate; and

- Purpose 3: Prevent communities in the environs of Cambridge from merging into one another and with the city: Relatively limited.
- 4.27 The GCGBA finds that release of land sub area 1 would result in moderate-high harm, falling at the middle of the 5-point scale (low, moderate, moderate-high, high and very high harm).
- 4.28 The GCGBA finds that the release of land sub area 2, closest to the settlement, alone would result in moderate harm (below the middle of the range).

Section 5

Appraisal of the Greater Cambridge Green Belt Appraisal

Appraisal of the Greater Cambridge Green Belt Assessment Final Report 2021

5.1 An appraisal of the GCGBA has been undertaken at **Appendix EDP 3** with the findings summarised in **Table EDP 5.1**. The appraisal has considered:

- The GCGBA findings regarding the effect of release of parcel HI8 on the GB; and
- Application of the GCGBA findings to consideration of potential harm of GB release of the site.

5.2 The appraisal has been undertaken in relation to each of the GCGBA assessment steps:

- Parcel location and openness;
- Distinction between parcel and inset area;
- Contribution to the GB purposes;
- Impact on contribution of adjacent GB; and
- Overall harm of GB release.

Table EDP 5.1: Summary of EDP Appraisal of GCGBA Findings in Relation to Overall Harm of Green Belt Release of Host Parcel HI8 and the Site

GCGBA Assessment Topics	GCGBA Findings (Appendix B Parcel HI8)	EDP's Findings re Parcel HI8	EDP's Findings re the Site
Openness	Land is open	Agreed in so far as they do not contain 'development of a scale, character or form that has a significant impact on GB openness.'	Agreed, as for the parcel.
Distinction between parcel and inset area	Moderate	Weak distinction due primarily to parcel comprising infill	Weak distinction, as found for parcel.
Contribution to the Cambridge GB purposes (scale: significant, relatively significant, moderate, relatively limited, limited or no contribution to purpose)			

GCGBA Assessment Topics	GCGBA Findings (Appendix B Parcel HI8)	EDP's Findings re Parcel HI8	EDP's Findings re the Site
Purpose 1 - to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre	Moderate contribution	Limited or no contribution due primarily to the fact that it isn't 'located in the immediate vicinity of Cambridge'.	Limited or no contribution as found for the parcel.
Purpose 2 - to maintain and enhance the quality of Cambridge's setting	Moderate contribution	Relatively limited contribution due, primarily, to the fact that it does not have a strong distinction from the inset settlement and the fact that it contains 'limited features/aspects that contribute to the quality of Cambridge's setting'.	Site plays a lesser role than the parcel as a whole due to its more limited area and set back from Impington St Andrew's Conservation Area.
Purpose 3 - to prevent communities in the environs of Cambridge from merging into one another and with the city	Relatively limited contribution	Agreed.	Site plays a lesser role than the parcel as a whole due to its more limited area and set back to the west of the parcel.
Impact on contribution of adjacent GB (scale: major, moderate major, moderate, minor-moderate, minor impact)			
Release of land beyond the smaller hedged fields on the inset settlement edge (sub areas 1 and 2), as an expansion of Impington	Minor impact	Agreed.	Site plays a lesser role than the parcel as a whole.
Release of land within the smaller hedged fields on the inset settlement edge (sub area 2) as an expansion of Impington	Negligible impact	Agreed.	Not considered as the site falls predominantly outside this area.
Overall harm of GB release (scale: very high, high, moderate high, moderate, low harm)			

GCGBA Assessment Topics	GCGBA Findings (Appendix B Parcel HI8)	EDP's Findings re Parcel HI8	EDP's Findings re the Site
Release of land beyond the smaller hedged fields on the inset settlement edge (sub areas 1 and 2), as an expansion of Impington	Moderate-high overall harm	Low overall harm due to relatively weak contribution to the GB purposes and minor impact on adjacent GB land.	Site plays a lesser role than the parcel as a whole.
Release of only land within the smaller hedged fields on the inset settlement edge (sub area 2) as an expansion of Impington	Moderate overall harm	Low harm.	Not considered as the site falls predominantly outside this area.

5.3 **Table EDP 5.1** shows that EDPs appraisal of the GCGBA, undertaken in the light of its own desk and field-based assessment, finds minor differences at each stage of the process. EDPs assessment finds that GCGBA over plays the distinction between parcel and inset area due, primarily, to the fact that it does not consider that the area comprises infill. This then leads to an overestimate in the contribution of the area to Purposes 1 and 2 and to the level of harm because of release of the land.

Other Considerations

5.4 It should also be noted that, as set out in the GCGBA:

- “the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, higher performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.” (paragraph 5.3);
- “there are other important factors that need to be considered when establishing exceptional circumstances for making alterations to Green Belt boundaries, most notably sustainability, viability and deliverability issues. In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation”;
- “In addition, consideration will need to be given to potential measures to mitigate harm to the Green Belt, as well as potential opportunities to enhance the beneficial use of the Green Belt.” (GCGBA paragraphs 5.25-5.26);
- Paragraph 151 (previously 145) of the NPPF, states that: “... local planning authorities should plan positively to enhance the beneficial use of the Green Belt...”; and
- Potential enhancements to the GB are listed at GCGBA paragraphs 5.22–5.23 with reference to:

- Green Infrastructure Opportunity Mapping Final Report (July 2021) prepared by LUC; and
- Landscape Character Assessment Report (2021).



Section 6

Assessment of Site contribution to Green Belt Purposes

- 6.1 The methodology used by EDP for the consideration, in landscape and visual terms, of the site to the purposes of GB is set out at **Appendix EDP 4**.
- 6.2 For each NPPF 2024 purpose, the methodology has defined criteria against the which the site is assessed below.
- 6.3 EDP's assessment criteria for Purpose 1 are set out at **Table EDP A4.1 (Appendix EDP 4)**. These criteria are tested in respect to the site in **Table EDP A4.1**, where they are repeated (for ease of reference, then followed by consideration in relation to the site.
- 6.4 In summary the assessment finds:
1. To check the unrestricted sprawl of large built-up areas – medium contribution;
 2. To prevent neighbouring towns merging into one another – low contribution;
 3. To assist in safeguarding the countryside from encroachment – medium contribution;
 4. To preserve the setting and special character of historic towns – low contribution; and
 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land – not assessed.

Table EDP 6.1: Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

Purpose 1: To check the Unrestricted Sprawl of Large Built-up Areas	
<p>Criterion 1 Is the site located at the edge of a large built-up area (as defined by the Local Planning Authority)?</p>	<p>i. <u>Yes, the site is located at the edge of a defined large built-up area (Move to Purpose 1 criteria 2 to 4); and</u></p> <p>ii. No, the site is not located at the edge of a defined large built-up area (Move to Purpose 2).</p>
<p><u>Option i</u> - Histon and Impington is identified in the South Cambridgeshire Local Plan (adopted 2018) Policy S/18 as a Rural Centre. Rural Centres are defined in the Local Plan as 'the largest, most sustainable villages of the district. They have good access to a secondary school (either within the village or accessible by good public transport), employment opportunities, a variety of services and facilities and have good public transport services to Cambridge or a market town.' (para. 2.55).</p> <p>The site is therefore considered to be located at the edge of a defined large built-up area and consideration moves to Purpose 1 criterion 2 is considered.</p>	
<p>Criterion 2 Creates a clear, recognisable distinction between urban fringe and open countryside</p>	<p>If the site is located adjacent to a large built-up area, is the site perceived as forming a contiguous undeveloped buffer between the existing settlement edge and the wider countryside (higher to lower contribution a-c)?</p>

	<p>a. Yes, the site has an open character, being free of development and associated influences with limited tree cover, strongly contributing to an open character of the GB;</p> <p>b. <u>There is an absence of development within the site but it is overlooked by adjacent/nearby development/wooded/treed areas;</u> and</p> <p>c. No, the site contains development and/or tree cover such that it does not clearly define a perceptible distinction between the settlement edge and the open countryside.</p>
<p>Contribution b - There is an absence of development within the site but it is overlooked by adjacent/nearby development/wooded/treed areas. There is intervisibility with the existing settlement edge at Histon, notably to the north-west and south-west, that creates a settlement edge character across the site although less so to the south-east. This is illustrated by Images EDP 6.1 and 6.2.</p>	
	
<p>Image EDP 6.1: The northern field parcel of rough grassland with residential development off Mill Lane beyond the northern end of the north-western site boundary.</p>	
	
<p>Image EDP 6.2: The south-western field parcel of grassland with residential development off Mill Lane beyond the southern end of the north-western site boundary.</p>	
<p>Criterion 3 Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to GB parcels. These may be within the site or form part of its boundary. Such boundaries can be permanent, such as roads, steep topography,</p>	<p>Does the site have a defensible boundary which can prevent the sprawl of a large built-up area (higher to lower contribution a-c)?</p> <p>a. The site does not have a defensible boundary and therefore open character is greater;</p> <p>b. <u>The site has a defensible boundary/boundaries, which would need additional reinforcement;</u> and</p>

woodland or require additional reinforcement such as hedgerows, tree belts, streams. Fences do not form defensible boundaries.	c. The site has a defensible boundary/boundaries, which do not require additional reinforcement.
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Contribution b - The site has defensible boundaries which, with additional reinforcement, would make a positive contribution to the restriction of urban sprawl. These comprise a well treed hedgerow to the south-east and south-west and a ditch and immature hedge to the north-east as illustrated in the images below:




Image EDP 6.3: The south-eastern boundary, seen from within the site, is marked by a well-treed mature hedge.



Image EDP 6.4: The south-western boundary, seen from within the site, is marked by a well-treed mature hedge.



Image EDP 6.5: The northern boundary, seen from within the site, is marked by a somewhat gappy semi mature hedge/stretches of scrub and trees lining the southern edge of a drainage ditch.

Purpose 2: 2: To Prevent Neighbouring Towns Merging into one Another	
<p>Criterion 1 Settlements maintain a sinuous edge.</p>	<p>Perceptually, is the site well associated with the existing settlement edge (higher to lower contribution a-c)?</p> <ul style="list-style-type: none"> a. The site is perceived as being isolated from the settlement boundary and appears divorced from it; b. The site abuts one settlement boundary but is not divorced from it; and c. <u>The site abuts two or more settlement boundaries and is perceived as part of an indent.</u>
<p><u>Contribution c</u> - The site falls within an indent in the settlement edge of the combined settlements of Histon and Impington, abutting the settlement edge to the north-west and sitting in close proximity to the settlement edge to the south-west, it is perceived as part of an indent as illustrated by Image EDP 6.6 and Images EDP 6.3 to 6.5.</p>	
	
<p>Image EDP 6.6: The site is surrounded by development on three sides with agricultural land within the GB to the north.</p>	
<p>Criterion 2 Prevent loss or noticeable reduction in perceived distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better</p>	<p>Is the site located within a perceived 'gap' between settlements (higher to lower contribution a-d)?</p> <ul style="list-style-type: none"> a. The site, or part of it, is perceived as forming a clear gap between two settlement areas; b. The site forms part of a wider gap between settlements; c. The site forms a small part of a larger gap between settlements and changes in its character are unlikely to result in perceived merging of settlements; and

capable of accommodating change than a narrow gap.	d. <u>The site does not form part of a perceived gap between settlement areas.</u>
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Contribution d - The site does not form part of a perceived gap between settlement areas. It is located to the north-east of Histon and Impington with the Policy S/8: Rural Centre settlement of Cottenham to the north, north, east and the Policy S/9: Minor Rural Centres of Waterbeach to the north-east, as illustrated by **Image EDP 6.7**. As illustrated in **Image EDP 6.8**, the site falls to the north-east of the combined settlement and does not fall between it and Cambridge.

The distance between Histon and Impington and Cottenham is approximately 1.2km, at their closest point along the B1049, and between Histon and Impington and Waterbeach is approximately 3.2km at their closest point. There is no intervisibility between Histon and Impington land and either of these settlements.

The PLVA, as reported at Section 3 above, finds that the site is visually contained by vegetation and settlement at and beyond its site boundaries to the north-west, south-west and south-east. To the north-east it is visibility contained to the adjacent agricultural field where there is no public access. As such there is no intervisibility, and no in combination or sequential views between the site and any other settlement other than Histon and Impington.

The site does not fall within these gaps between the settlements and it is considered very unlikely that it will be perceived as falling in a gap between settlement areas or as diminishing the actual or perceived distance between them.

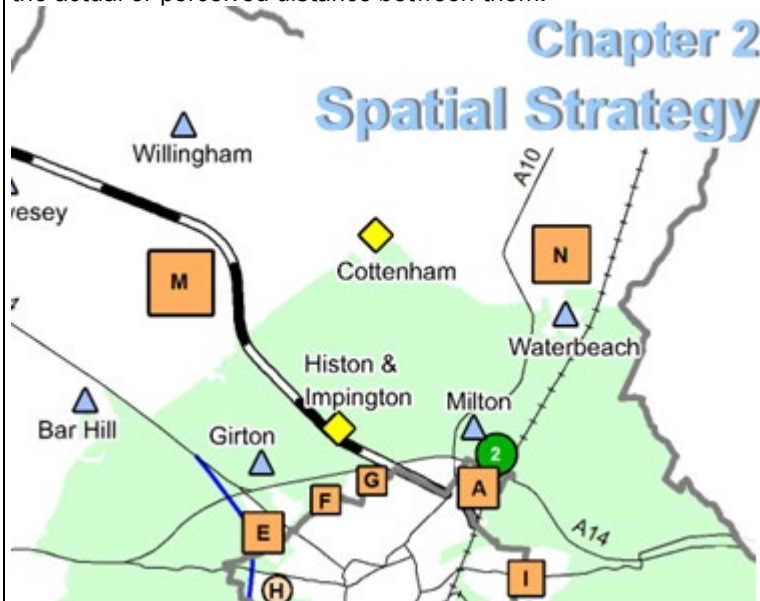


Image EDP 6.7: Local Plan 2018 extract showing Policy S/8: Rural Centres as yellow squares and Policy S/9: Minor Rural Centres as blue triangles. The white area indicates the extent of Cambridge.

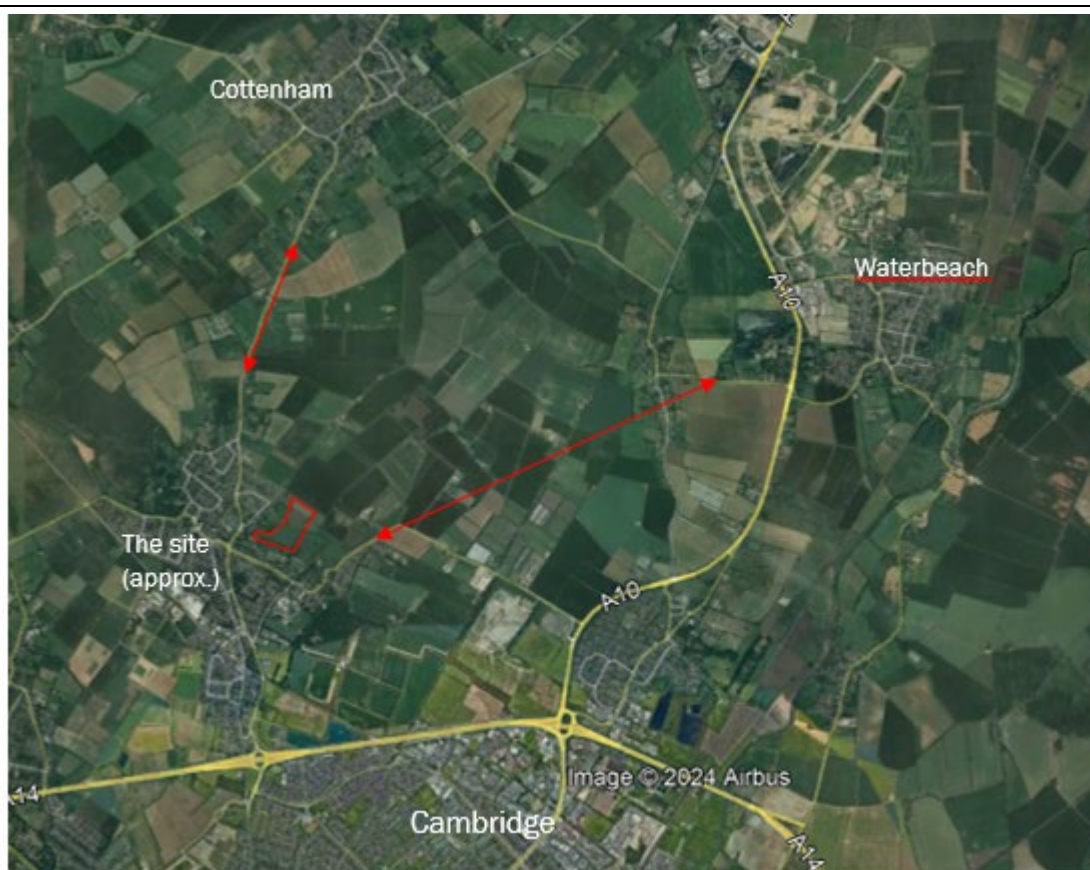


Image EDP 6.8: Aerial photograph showing the relative locations of settlements and the site and the separation between them.

<p>Criterion 3 The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent perceived merging.</p>	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence (higher to lower contribution a-c)?</p> <ul style="list-style-type: none"> a. Immediate and clear intervisibility with next nearest settlement edge; b. Partial visual association with next nearest settlement edges; and c. <u>Limited or no visual association with next nearest settlement edges.</u> <p><u>Contribution c</u> – As set out above, there is no visual association with next nearest settlement edges and the site does not reduce the distance between Histon and Impington and the next nearest settlements.</p>
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Purpose 3: To Assist in Safeguarding the Countryside from Encroachment	
Criterion 1 The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.	To what extent does the site represent the key characteristics of the countryside (higher to lower contribution a-c)? <ul style="list-style-type: none"> a. The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics; b. <u>The site comprises some representative key characteristics but there are few connections with off-site characteristics;</u> and c. The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics.
Contribution b - The site comprises some representative key characteristics but there are few connections with off-site characteristics. As found by the PLVA, and reported in Section 3 above, in some respects the landscape north of Histon and Impington is consistent with GCLCA landscape description of the rural landscape. However, the published description of the landscape beyond the settlement limit is broad scale and does not take into account the local influences. Notably, intervisibility with the existing settlement edge at Histon creates a settlement edge character across the site, notably to the north-west and south-west.	
Criterion 2 Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.	To what extent is the site urbanised, either by on-site or off-site features (higher to lower contribution a-c)? <ul style="list-style-type: none"> a. There are no urbanising features within the site or directly influencing it; b. <u>There are several urbanising features affecting the site;</u> and c. There are many urbanising features affecting the site, which reduces its representativeness of the countryside. The site is perceived as previously developed land.
Contribution b - There are several urbanising features affecting the site as set out above in relation to Purpose 1 criterion 3	
Purpose 4: To Preserve the Setting and Special Character of Historic Towns	
Criterion In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to a conservation area (CA) which relates to the historic character of a town.	The proximity of the site to the CA must also be balanced with the nature of intervisibility with the historic core of the CA, as this is a reflection of the extent to which the CA designation and its boundaries still applies (higher to lower contribution a-c): <ul style="list-style-type: none"> a. The site is partially or wholly within the historic character area of the town/CA; b. The site shares a boundary with or has Intervisibility with the historical character area/CA; and c. <u>The site does not share a boundary with the town/CA and/or there is no intervisibility with its historic core/CA.</u>
Contribution c. The site does not share a boundary with either the Histon or Impington Conservation Area, as illustrated by Plan EDP GB1 , and there is no intervisibility with its historic cores of Histon or Impington as defined by their conservation areas.	

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Section 7

Site Contribution to Green Belt

- 7.1 This section reviews the findings, of the GCGBA and EDP's assessment of the site against the NPPF 2024 GB Purposes to determine whether the application of the Framework is likely to find development of the site 'not inappropriate'.

NPPF 2024

Paragraph 151 in Relation to Infill

- 7.2 Paragraph 151 requires that:

"A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

g) limited infilling ... which would not cause substantial harm to the openness of the Green Belt;"

- 7.3 Desk and field assessment shows that the site and the GCGBA parcel constitutes 'infill' due partial enclosure by development comprising the northern extents of the combined settlements of Histon and Impington to the north-west, south-west, and south-east, as illustrated at **Image EDP A3.1** in **Appendix EDP 3**.

- 7.4 The GCGBA assessment parcel, and the site, are open in so far as they do not contain 'development of a scale, character or form that has a significant impact on GB openness.' Based on the findings of the Preliminary LVA it is found that development of the site as proposed would not cause 'substantial harm' to the openness of the remaining GB due in part to its relatively small scale in relation to the wider GB. In this regard it is should not be considered inappropriate development.

Paragraph 155 In Relation to Grey Belt

- 7.5 In relation to new paragraph 155 and grey belt, GB should not be regarded as inappropriate where:

"a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;"

- 7.6 The NPPF 2024 Annex 2 defines grey belt 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. 'Grey belt' excludes land where the application of the policies relating to the areas or

assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

7.7 The GCGBA finds that “the harm [to GB] resulting from its [parcel HI8] release, as an expansion of Impington, would be moderate-high”, however, EDP’s review of the assessment against its own definitions finds a medium or low overall harm. On this basis it can be argued that the development of the site would not fundamentally undermine the function of the GB across the area of the plan as a whole.

7.8 Further, the GCGBA and EDP find a limited contribution to the Cambridge GB purposes and the NPPF 2024 GB purposes, as summarised below, so that it is concluded that the site comprises grey belt.

Table EDP 7.1 (Table EDP 5.1 extract): Summary of EDP Appraisal of GCGBA Findings in Relation to Overall Harm of Green Belt Release of Host Parcel HI8 and the Site

GCGBA Assessment Topics	GCGBA Findings (Appendix B Parcel HI8)	EDP’s Findings re Parcel HI8	EDP’s Findings re the Site using GCGBA Method
Purpose 1 - to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre	Moderate contribution	Limited or no contribution due primarily to the fact that it isn’t ‘located in the immediate vicinity of Cambridge’.	Limited or no contribution as found for the parcel.
Purpose 2 - to maintain and enhance the quality of Cambridge’s setting	Moderate contribution	Relatively limited contribution due, primarily, to the fact that it does not have a strong distinction from the inset settlement and the fact that it contains ‘limited features/aspects that contribute to the quality of Cambridge’s setting’.	Site plays a lesser role than the parcel as a whole due to its more limited area and set back from Impington St Andrew’s Conservation Area.
Purpose 3 - to prevent communities in the environs of Cambridge from merging into one another and with the city	Relatively limited contribution	Agreed	Site plays a lesser role than the parcel as a whole due to its more limited area and set back to the west of the parcel.

Table EDP 7.2: Summary of EDP Assessment of the Site Against the NPPF 2024 GB Purposes 1 to 4

NPPF Purpose	Findings of EDP’s Assessment
Purpose 1: To check the unrestricted sprawl of large built-up areas	Medium contribution

NPPF Purpose	Findings of EDP's Assessment
Purpose 2: To prevent neighbouring towns merging into one another	Low contribution
Purpose 3: To assist in safeguarding the countryside from encroachment – medium contribution	Medium contribution
Purpose 4: To preserve the setting and special character of historic towns	Low contribution

Consideration Against the Consultation on Proposed Reforms to the National Planning Policy Framework and other Changes to the Planning System (30 July 2024 to 24 September 2024)

7.9 The parcel and site land can also be tested against the parameters set out in the consultation document which, while not taken forward to the NPPF 2024, provides the only guidance on the assessment of grey belt. It states:

“Land which makes a limited contribution to the Green Belt purposes will:

- a) Not strongly perform against any Green Belt purpose; and*
- b) Have at least one of the following features:*
 - i. Land containing substantial built development or which is fully enclosed by built form*
 - ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another*
 - iii. Land which is dominated by urban land uses, including physical developments*
 - iv. Land which contributes little to preserving the setting and special character of historic towns”.*

7.10 With regard to the study parcel the GCGBA allows the conclusion that the land makes a limited contribution to the GB purposes as:

- a) The parcel does not strongly perform against any GB purpose, as summarised in **Table EDP 7.1**; and
- b) The parcel has the following ‘feature’: *“ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another”.*

7.11 EDP's review of GCGBA and its own assessment against the NPPF 2024 Purposes finds that:

- a) The site does not strongly perform against any GB purposes, as summarised in **Tables EDP 7.1 and 7.2**:

b) The parcel has the following two 'features':

- “ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another*
- v. Land which contributes little to preserving the setting and special character of historic towns”.*

7.12 These findings again lead to the conclusion that the site comprises grey belt land.

Summary and Conclusion

7.13 EDP has reviewed the GCGBA to determine the contribution that the site makes to the Cambridge GB Purposes (which are representative of the NPPF 2024 purposes locally) and its contribution to adjacent GB, and overall harm of GB release of the site. The findings are summarised in **Table EDP 7.1**. EDP has also undertaken an assessment of the performance of the site against the GB purposes using its own methodology. The findings are summarised in **Table EDP 7.2**.

7.14 When the findings of EDP review and assessment are tested against the NPPF 2024, and separately, against the parameters set out in the consultation document, EDP find that the site comprises grey belt land and residential development of the site would not be inappropriate in terms of GB release.

7.15 In addition, based on the findings of the PLVA it is found that development of the site as proposed would not cause 'substantial harm' to the openness of the remaining GB due, primarily, to its relatively small scale in relation to the wider GB and to its visual enclosure. In this regard it should not be considered inappropriate development.

Section 8 Conclusions

- 8.1 EDP has been commissioned by Martin Grant Homes to undertake a GB Appraisal of the Cambridge GB surrounding Histon and Impington, as illustrated on **Plan EDP GB1**. This work has been undertaken by a qualified Landscape Architect experienced in undertaking GB assessments and appraisals
- 8.2 The purpose of the GB Appraisal is to test whether bringing forward sustainable development on this site, as informed by the PLVA, would allow the fundamental aim and purposes of the GB, in the context of the wider merged settlements of Histon and Impington, to be maintained or possibly even enhanced.
- 8.3 The fundamental aim and purposes of GB are set out in the NPPF 2024 paragraphs 142–143 and the purposes of the Cambridge GB are set out in South Cambridgeshire Local Plan (adopted September 2018) Policy S/4 – Cambridge GB and associated lower case text.
- 8.4 Cambridge City Council and South Cambridgeshire District Council have undertaken several GB reviews. Of these only the most recent, the Greater Cambridge Green Belt Assessment Final Report, South Cambridgeshire District Council and Cambridge City Council (LUC, August 2021) (GCGBA), has undertaken a review of the contribution made to the Cambridge GB of land containing the site and its context (GCGBA Parcel HI8). This document forms a part of the emerging Greater Cambridge Local Plan evidence base.
- 8.5 EDP has undertaken an appraisal of this assessment considering:
- The GCGBA findings in relation to the host parcel HI8's:
 - Contribution to the Cambridge GB purposes;
 - Impact on contribution of adjacent GB; and
 - Overall harm of GB release.
 - Application of the GCGBA findings to consideration of potential harm of release of the site from GB.
- 8.6 EDP has also undertaken an assessment of the performance of the site against the NPPF 2024 GB purposes using its own methodology.
- 8.7 This work finds that the site provides a limited contribution to Cambridge GB purposes and that release would result in a low overall harm to GB (on the GCGBA scale: very high, high, moderate high, moderate, low harm). It also finds that development can occur in this location without compromising the fundamental aim of the GB to keep land permanently open and while continuing to serve the three purposes of the Cambridge GB, and to the NPPF 2024 Purposes.

8.8 Further, development of the site, incorporating the key considerations as set out in the PLVA and illustrated on the Concept Masterplan, would be compatible with the protection of the factors that define the “*special character of Cambridge and its setting*”.

8.9 These findings are primarily due to:

- The visual and physical separation of the site from the city, by the built development of Histon and Impington and the A14, so that there is no physical or perceived increase in proximity between Histon and Impington and the city;
- The site’s location within an indent in the northern edge of the settlement so that it comprises infill that is well associated with the settlement and does not extend beyond the existing settlement extents or, consequentially, reduce the distance between settlements;
- The visually contained nature of the site, which means that there is no perception of settlements merging into one another;
- The visual containment of the site, which limits changes to visual amenity and landscape character across the site context;
- The site’s existing defensible boundaries and visual containment, together with proposed boundary planting to the north, which reduces the visual and physical association between the site and the wider countryside to the north and east, so that its removal from the GB would not undermine the integrity of the GB beyond;
- The potential to secure the retention and enhancement of vegetation along the southern, eastern, and western boundaries and introduce a new characteristic woodland belt along the northern boundary, so further enhancing the defensible boundaries and visual containment; and
- The fact that, as identified by the PLVA:
 - The site is not located within, and does not contain, a designated site;
 - Local influences create a settlement edge character across the site and near context; and
 - The site does not contain any features that are rare in this landscape.

8.10 It is considered that the site could reasonably be removed from the GB and developed in accordance with the principles set out in the PLVA without harm to the integrity of the GB overall and with potential measures to mitigate harm in terms of creation of an attractive, integrated settlement edge and a defensible GB boundary, and enhancement of the beneficial use of the GB through environmental enhancement.

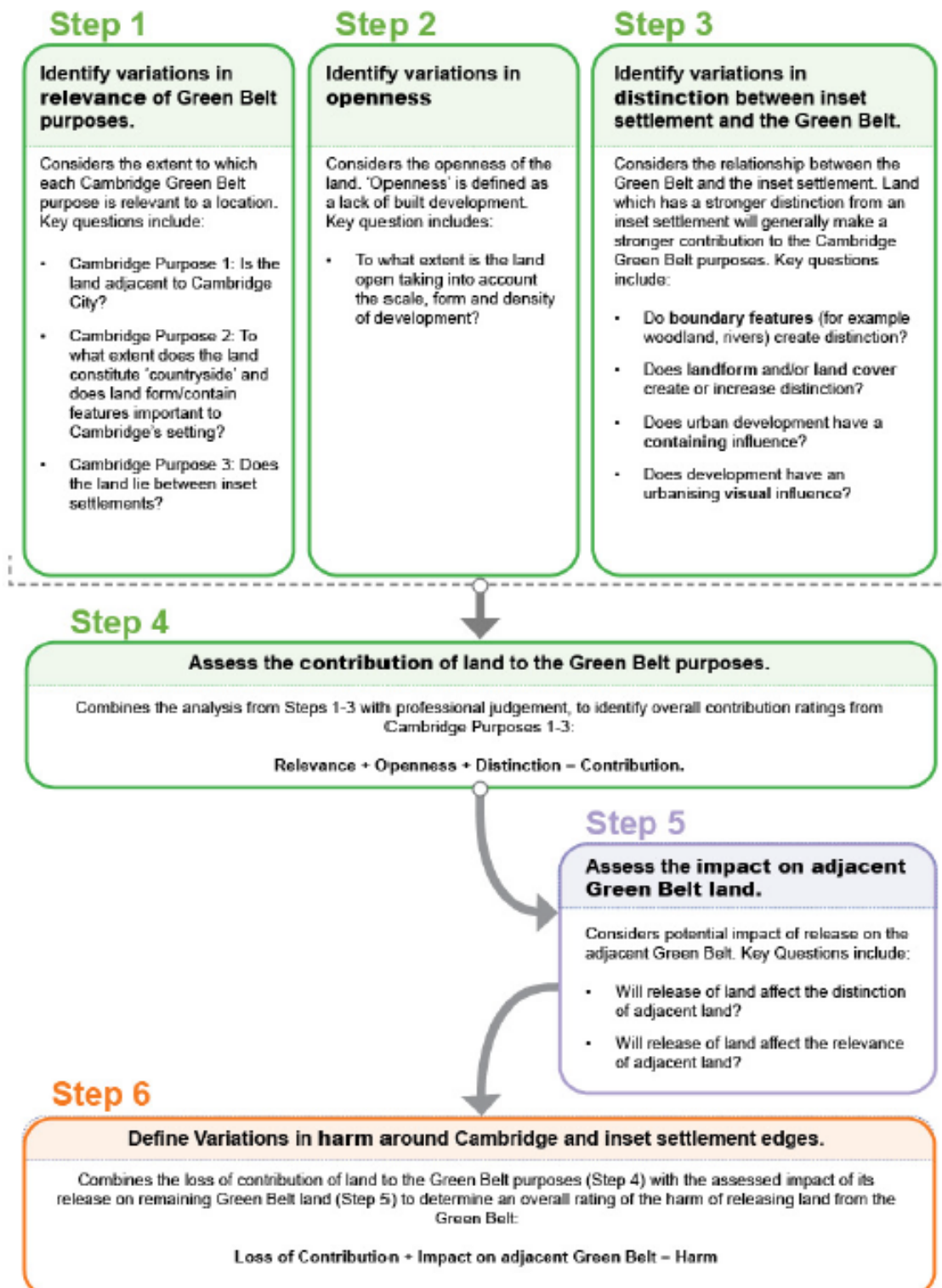
- 8.11 When considered in the light of the emerging NPPF 2024, EDP finds that the site comprises grey belt. Further, based on the findings of the PLVA it is found that the site comprises infill and would not cause 'substantial harm' to the openness of the remaining GB due. For these reasons residential development of the site would not be inappropriate in terms of GB release.

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Appendix EDP 1

GCGBA Figure 3.2: Harm Assessment Steps Overview

Figure 3.2: Harm assessment steps overview



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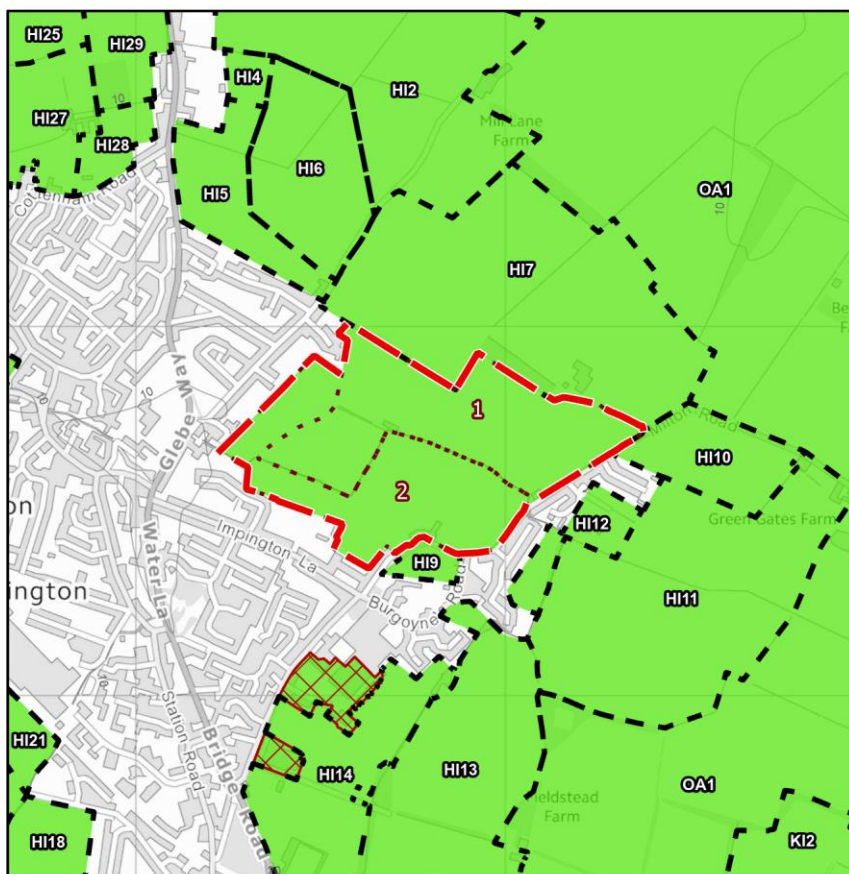
Appendix EDP 2
Parcel HI8 Detailed Contribution and Harm Assessment
(GCGBA Appendix B Extract)

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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.

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

Appendix EDP 3

Appraisal of the Greater Cambridge Green Belt Assessment 2021 Findings

A3.1 A review of the findings of the GCGBA regarding parcel HI8 is set out below. Each of the assessment areas in the GCGBA process is listed, followed by a table noting the findings in the GCGBA in the left column, and EDP's appraisal in the right-hand column.

A3.2 Parcel assessment areas:

- Parcel location and openness;
- Distinction between parcel and inset area;
- Contribution to the GB purposes;
- Impact on contribution of adjacent GB; and
- Overall harm of GB release.


A3.3 Review of the findings of the GCGBA:

Table EDP A3.1: Parcel Location and Openness

GCGBA Findings (Appendix B Parcel HI8)	EDP's Findings
Openness <i>"Land is open. There is no development of a scale, character or form that has a significant impact on Green Belt openness."</i>	Parcel: EDP agree that the parcel, and the site, are open in so far as they do not contain 'development of a scale, character or form that has a significant impact on GB openness.'
	Site land: EDP comes to the same finding in relation to the site land forming the western area of the parcel.

Table EDP A3.2: Distinction Between Parcel and Inset Area (Land that is more strongly related to an inset settlement makes a weaker contribution to GB)

GCGBA Findings (Appendix B Parcel HI8)	EDP's Findings
Distinction	<p>Parcel: EDP does not challenge the assessment as far as it goes but finds that, in addition, the parcel constitutes 'infill' due to its partial enclosure by development comprising the northern extents of the combined settlements of Histon and Impington which wraps around the development to the north-west, south-west and south-east, as illustrated at Image EDP A3.1.</p> <p>As set out in GCGBA Green Box page 70 (see Image EDP A3.2 below) infill would have a</p>

GCGBA Findings (Appendix B Parcel HI8)	EDP's Findings
 <p>Image EDP A3.1: Map extract showing the location of Parcel HI8 between the north-eastern extents of the settlement (GCGBA App. B extract).</p> <p><i>“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.”</i></p> <p>(rating on a 4-point scale: weak, moderate, strong, or very strong distinction)</p>	<p>relatively limited impact in terms of GB contribution (PAS Planning) and is not inappropriate within the GB (NPPF Paragraph 154).</p> <p>In light of the above EDP find that overall, there is weak distinction (the lowest GCGBA rating) between the parcel and the urban area due, primarily, to the fact that it constates infill.</p> <p>Site land: EDP comes to the same finding in relation to the site land forming the western area of the parcel.</p>

Infill Development

Paragraph 149 of the NPPF [2021] notes that ‘limited infilling’ is not inappropriate within the Green Belt. – Paragraph 145 [2019]. [Paragraph 154 2023]

PAS guidance states that development that would effectively be ‘infill’, due to the land’s partial enclosure by development, would have a relatively limited impact in terms of Green Belt contribution. – PAS Planning on the Doorstep.

This study considered the degree of containment from existing urban development in the assessment of whether land is distinct or not from the urban edge.

Image EDP A3.2: Infill Development (GCGBA Extract Green Box page 70).

Table EDP A3.3: Contribution to the Cambridge Green Belt Purposes 1 to 3

GCGBA Findings (Appendix B Parcel H18)	EDP’s findings
<p>“Cambridge Purpose 1 - to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre:</p> <p>Contribution: <u>Moderate</u></p> <p><i>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.”</i></p>	<p>GCGBA paragraph 3.71 states that “Criteria used to assess contribution to Cambridge Purpose 1 are set out in Table 3.2 below. For land to contribute to preserving the unique character of Cambridge as a compact city it needed to be located in the immediate vicinity of Cambridge.”</p> <p>As noted by the assessment, the land sits adjacent to Impington, not Cambridge so that the criteria listed in GCGBA Table 3.2 are not relevant.</p> <p>Further, the parcel falls to the north-east of this settlement, the opposite side to Cambridge.</p> <p>EDP therefore finds that the parcel makes <u>limited or no contribution</u>, at most, to Purpose 1 as it is not “located in the immediate vicinity of Cambridge”.</p> <p>Site land: EDP comes to the same finding in relation to the site land forming the western area of the parcel.</p>
<p>“Cambridge Purpose 2 - to maintain and enhance the quality of Cambridge’s setting:</p> <p>Contribution: <u>Moderate</u></p> <p><i>The parcel comprises open farmland and woodland that has a <u>moderate</u> distinction from the edge of Impington, meaning it has <u>some rural character</u>.</i></p>	<p>Parcel:</p> <p>In assessing the relevance of land to Cambridge Purpose 2 GCGBA takes a two-element approach considering:</p> <ul style="list-style-type: none"> • Element 1 – the extent to which land constitutes countryside based on its usage and distinction from an inset settlement. • Element 2 – the extent to which land forms or contains other features or aspects that contribute to the quality of Cambridge’s setting.

GCGBA Findings (Appendix B Parcel H18)	EDP's findings
<p>Land lies partly within and fronts directly onto Histon and Impington Conservation Area to the south and as such <u>allows some appreciation of the rural character and setting of the more intact and historic parts of Impington</u> (including Burgoyne's Road), which in turn contributes to the wider rural setting of Cambridge.</p> <p>Overall the parcel makes a <u>moderate</u> contribution to Cambridge Purpose 2".</p>	<p>As reported above, GCGBA App B finds that, 'Overall there is <u>moderate distinction</u> between the parcel and the urban area'.</p> <p>This is at odds GCGBA Table 3.3: 'Criteria used to inform the assessment of contribution to Cambridge Purpose 2' which defines areas making a moderate contribution as having a <u>strong distinction</u> from any inset settlements:</p> <p><u>Moderate contribution</u> - "Land use is not associated with an inset settlement, land is open and it has a <u>strong distinction from any inset settlements</u>, and therefore has a <u>strong rural character</u>; it may also form/contain <u>limited features/aspects that contribute to the quality of Cambridge's setting</u>"</p> <p><u>In contrast</u> GCGBA Table 3.3 defines land making a Relatively <u>limited contribution</u> as – "Land use is not associated with an inset settlement, land is open and <u>does not have a strong distinction from an inset settlement</u>, and therefore has <u>some rural character</u>; it may also form/contain <u>limited features/aspects that contribute to the quality of Cambridge's setting</u>".</p> <p>It is noted that both these definitions are the same in relation to contribute to the quality of Cambridge's setting.</p> <p>Based on GCGBA's assessment, in the column to the left, and its definitions, above, it EDP find that the parcel makes a <u>relatively limited contribution</u>, rather than a moderate, contribution to Cambridge GB Purpose 2. This is further supported by EDP's finding above that, due primarily to the infill location of the parcel, there is weak distinction (the lowest GCGBA rating) between the parcel and the urban area.</p>
	<p>Site land: In addition to the above, which is of relevance to the site as well as to the parcel as a whole, as illustrated in Image EDP A3.3 the site is set back from, and so protects views from, the conservation area to the south. Consequentially the site plays a lesser role in contribution to Cambridge Purpose 2 than the parcel as a whole.</p>

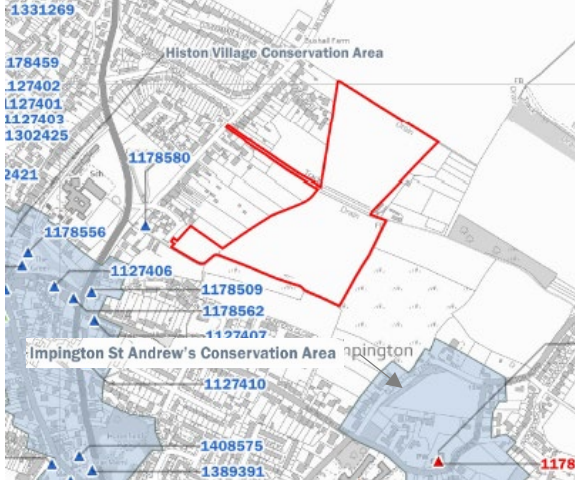
GCGBA Findings (Appendix B Parcel H18)	EDP's findings
	 <p>Image EDP A3.3: Site land in relation to Conservation Area.</p>
<p>Cambridge Purpose 3 - to prevent communities in the environs of Cambridge from merging into one another and with the city.</p> <p>Contribution: Relatively limited</p> <p><i>"Land 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 <u>relatively limited contribution</u> to Cambridge Purpose 3."</i></p>	<p>Parcel: EDPs desk and field studies support this finding.</p> <p>Site land: The site land, being located to the west of the parcel, is further separated from Landbeach than the parcel as a whole:</p> <ul style="list-style-type: none"> • Impington lies some 2.33km from Landbeach at the nearest point; • Parcel H18 lies some 2.33km from Landbeach at the nearest point; • The site lies some 2.84km from Landbeach at the nearest point; and • There is no intervisibility between Impington, Parcel H18 or the site and Landbeach. <p>Development of the site would not diminish the physical or perceived distance between Impington and Landbeach and its contribution to Purpose 3 is therefore similar to that of the parcel as a whole.</p>

Table EDP A3.4: Impact on Contribution of Adjacent Green Belt:

GCGBA findings (Appendix B Parcel H18)	EDP's findings
<p><i>"Release of land beyond the smaller hedged fields on the inset settlement edge (map areas 1 and 2), as an expansion of Impington: Rating: <u>Minor</u>"</i></p>	<p>Parcel: EDP does not dispute this finding.</p> <p>Site land: The impact of contribution to adjacent GB as a result of development of the site land will be less, due to the limited proportion of this area of the parcel (less than a third) that the site represents.</p>
	<p>Parcel: EDP does not dispute this finding.</p>

GCGBA findings (Appendix B Parcel HI8)	EDP's findings
"Release of land within the smaller hedged fields on the inset settlement edge (map area 2) as an expansion of Impington: Rating: <u>Negligible</u> "	Site land: Not considered as the site falls predominantly outside this area.

- A3.4 It is noted that the impact levels of areas 1 and 2 on adjacent GB are primarily due to sections of open boundary to the north. In this regard the contents of the green box on GCGBA page 101 (see **Image EDP A3.4**) are relevant as highlighted. There is, therefore, the potential to reduce the impact of development of the parcel, and the site, through the creation of a strong boundary to the north to create a clear distinction between 'town' and 'country'. This could comprise a woodland block (see GCGBA paragraph 3.54 – examples of strong boundaries – woodland block).

Impact on distinction

PAS guidance notes the types of areas of land that might seem to make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes, including:

- ⑩ Land where development would be well contained by the landscape.
- ⑩ Land where a strong boundary could be created with a clear distinction between 'town' and 'country'. – PAS Planning on the Doorstep.

This study considered the degree of containment from existing urban development and boundary strength in the assessment of whether land is distinct or not from the urban edge.

Image EDP A3.4: Factors to Consider on the Assessment of Impact on Distinction (GCGBA pg. 101).

Table EDP A3.5: Overall Harm of Green Belt Release

GCGBA findings (Appendix B Parcel HI8)	EDP's findings
<p>"Parcel HI8 makes a <u>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.</u></p> <p>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 <u>minor</u>. Therefore, the harm</p>	<p>Parcel: GCGBA Table 3.6 sets out the 'Benchmark examples used to inform the assessment of overall harm to the Cambridge GB purposes' as below.</p> <p><u>moderate-high harm</u> – "Release of land results in a loss of <u>strong contribution to one of the Green Belt purposes, but would constitute a negligible impact on adjacent Green Belt land</u>"</p> <p><u>moderate harm</u> – "Release of land results in a loss of <u>moderate contribution to one of the Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land</u>"</p> <p>The contribution of the parcel to the 3 purposes as assessed by GCGBA are: Purposes 1 and 2 – moderate, Purpose 3 – relatively limited. GCGBA also find that the parcel and would constitute a</p>

GCGBA findings (Appendix B Parcel HI8)	EDP's findings
<p>resulting from its release, as an expansion of Impington, would be <u>moderate-high</u>"</p>	<p>minor impact on adjacent GB land at most. On this basis GCGBA's own definition of moderate harm is more appropriate to its findings than the reported moderate-high.</p> <p>Based on the above EDP find that the parcel as a whole (sub areas 1 and 2) would result in moderate not moderate-high overall harm.</p> <p>However, as noted above, EDP find that , based on GCGBA's own criteria and methodology:</p> <ul style="list-style-type: none"> Parcel HI8 arguably makes <u>limited or no</u>, rather than a <u>moderate</u> contribution, to Purpose 1: preserving Cambridge's compact character; and Parcel HI8 makes <u>limited or no</u>, rather than a <u>moderate</u> contribution, to Purpose 2: enhancing the quality of Cambridge's setting. <p>On this basis the overall harm is assessed as low defined in GCGBA Table 3.6 as: <i>"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 Release of land results in a loss of relatively weak contribution to one of the Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land."</i></p> <p>Site land: The overall harm of GB release of the site land will be less due to the limited proportion of the parcel (less than a third) that the site represents.</p>
<p>The additional impact on the adjacent GB of the release of only land within the smaller hedged fields on the inset settlement edge (sub area 2) would be <u>negligible</u>. Therefore, the harm resulting from its release, as an expansion of Impington, would be <u>moderate</u>.</p>	<p>Parcel:</p> <p>Discussion – GCGBA Table 3.6 sets out the 'Benchmark examples used to inform the assessment of overall harm to the Cambridge Green Belt purposes' as below.</p> <p><u>Moderate harm</u> – <i>"Release of land results in a loss of <u>moderate contribution</u> to one of the Green Belt purposes, and would constitute a <u>minor impact</u> on adjacent Green Belt land"</i></p> <p>Low harm – <i>"Release of land results in a loss of <u>moderate contribution</u> to one of the Green Belt purposes, and would constitute a <u>negligible</u> impact on adjacent Green Belt land;"</i></p>

GCGBA findings (Appendix B Parcel HI8)	EDP's findings
	<p>The difference between these two levels of harm is the level of <i>'impact on adjacent Green Belt land'</i>. Moderate harm requires a minor impact while low harm requires a negligible impact. GCGBA assessment finds that the level of harm for sub area 2 is negligible so resulting in low harm.</p> <p>Based on the criteria, and the GCGBA finding, EDP finds that release of sub area 2 would result in <u>low</u>, not moderate, overall harm.</p>
	<p>Site land: Not considered as the site falls predominantly outside this area.</p>

Appendix EDP 4

EDP Green Belt Assessment Methodology

Introduction

- A4.1 Provided within this section is the methodology used by EDP for the consideration, in landscape and visual terms, of GB open character.

Methodology

- A4.2 The National Planning Policy Framework (NPPF) presents updated policy which requires land to demonstrate that it contributes towards the essential characteristics of openness and permanence by meeting one or more of five purposes, or ‘tests’, of GB designation, which are set out at paragraph 138 as follows:

...

6. *“To check the unrestricted sprawl of large built-up areas;*
7. *To prevent neighbouring towns merging into one another;*
8. *To assist in safeguarding the countryside from encroachment;*
9. *To preserve the setting and special character of historic towns; and*
10. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

- A4.3 It has been established by case law (Appeal Ref APP/P2935/A/14/3000634) that openness is defined by *“an absence of buildings or other forms of development.”* However, the case of Turner²⁴ is important as it makes clear that a visual dimension should be included within any GB Assessment.

- A4.4 For each NPPF purpose, EDP has defined criteria that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the open character of the GB in this location. The criterion for each purpose is described in more detail below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- A4.5 This is a test that considers the site’s location in relation to defined built-up areas, particularly whether the site creates a clear, recognisable distinction between large built-up

²⁴ John Turner v Secretary of State for Communities and Local Government and East Dorset District Council [2016] EWCA Civ 466

areas (as defined within adopted policy) and the perceived open countryside.

A4.6 Assessment criteria considers whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may have already been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of open character, this being whether or not there is a sense that the site is enclosed by either man-made or landscape features.

A4.7 Sprawl may also be discouraged by defensible boundaries that are either natural (e.g. topography, woodland, water course) or man-made features (e.g. as a road, railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries contribute towards greater openness.

A4.8 **Table EDP A4.1** provides EDP's assessment criteria for Purpose 1.

Table EDP A4.1: Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

Purpose 1 Criteria	Application of Criteria to Site
Located at the edge of a large built-up area (as defined by the Local Planning Authority)	<p>Is the site located at the edge of a large built-up area (as defined by the Local Planning Authority)?</p> <p>a. Yes, the site is located at the edge of a defined large built up area; and</p> <p>b. No, the site is not located at the edge of a defined large built-up area (Move to Purpose 2).</p>
Creates a clear, recognisable distinction between urban fringe and open countryside	<p>If the site is located adjacent to a large built-up area, is the site perceived as forming a contiguous undeveloped buffer between the existing settlement edge and the wider countryside (higher to lower contribution a-c)?</p> <p>d. Yes, the site has an open character, being free of development and associated influences with limited tree cover, strongly contributing to an open character of the GB;</p> <p>e. There is an absence of development within the site but it is overlooked by adjacent/nearby development/wooded/treed areas; and</p> <p>f. No, the site contains development and/or tree cover such that it does not clearly define a perceptible distinction between the settlement edge and the open countryside.</p>
Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to GB parcels. These may be within the site or form part of its boundary. Such boundaries can be permanent, such as roads, steep	<p>Does the site have a defensible boundary which can prevent the sprawl of a large built-up area (higher to lower contribution a-c)?</p> <p>d. The site does not have a defensible boundary and therefore open character is greater;</p>

Purpose 1 Criteria	Application of Criteria to Site
topography, woodland or require additional reinforcement such as hedgerows, tree belts, streams. Fences do not form defensible boundaries.	<p>e. The site has a defensible boundary/-boundaries, which would need additional reinforcement; and</p> <p>f. The site has a defensible boundary/boundaries, which do not require additional reinforcement.</p>

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

A4.9 The wording of the NPPF refers to ‘towns’, but in the context of this assessment study area, the GB affects a considerably smaller geographical scale, in which it is more relevant to consider the perceived merging of neighbouring settlement edges as well as distinct settlement areas that might be defined as towns. In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or ‘on the ground’ by intervening natural or man-made features.

A4.10 The interpretation of ‘merging’, in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, as perceived in local views, the range can be much smaller. It is of note that susceptibility to ‘merging’ depends on the extent of open character between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

A4.11 **Table EDP A4.2** provides EDP’s assessment criteria for Purpose 2.

Table EDP A4.2: Purpose 2: To Prevent Neighbouring Towns Merging into One Another.

Purpose 2 Criteria	Application of Criteria to Site
<ul style="list-style-type: none"> Settlements maintain a sinuous edge. 	<p>Perceptually, is the site well associated with the existing settlement edge (higher to lower contribution a-c)?</p> <p>d. The site is perceived as being isolated from the settlement boundary and appears divorced from it;</p> <p>e. The site abuts one settlement boundary but is not divorced from it; and</p> <p>f. The site abuts two or more settlement boundaries and is perceived as part of an indent.</p>
<ul style="list-style-type: none"> Prevent loss or noticeable reduction in perceived distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap. 	<p>Is the site located within a perceived ‘gap’ between settlements (higher to lower contribution a-d)?</p> <p>e. The site, or part of it, is perceived as forming a clear gap between two settlement areas;</p> <p>f. The site forms part of a wider gap between settlements;</p>

Purpose 2 Criteria	Application of Criteria to Site
	<p>g. The site forms a small part of a larger gap between settlements and changes in its character are unlikely to result in perceived merging of settlements; and</p> <p>h. The site does not form part of a perceived gap between settlement areas.</p>
<ul style="list-style-type: none"> The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent perceived merging. 	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility on potential for coalescence (higher to lower contribution a-c)?</p> <p>d. Immediate and clear intervisibility with next nearest settlement edge;</p> <p>e. Partial visual association with next nearest settlement edges; and</p> <p>f. Limited or no visual association with next nearest settlement edges.</p>

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- A4.12 In terms of GB, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space, etc. Countryside is likely to be perceived as undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks or isolated properties, or even larger areas of settlement.
- A4.13 This assessment is based on the key landscape characteristics of the site and its surroundings, as well as the site's visual context. Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.
- A4.14 The matter of perceived 'encroachment' requires a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it, and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A4.15 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes

and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.

A4.16 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded.

A4.17 **Table EDP A4.3** provides EDP's assessment criteria for Purpose 3:

Table EDP A4.3: Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

Purpose 3 Criteria	Application of Criteria to Site
The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.	<p>To what extent does the site represent the key characteristics of the countryside (higher to lower contribution a-c)?</p> <p>d. The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics;</p> <p>e. The site comprises some representative key characteristics but there are few connections with off-site characteristics; and</p> <p>f. The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics.</p>
Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.	<p>To what extent is the site urbanised, either by on-site or off-site features (higher to lower contribution a-c)?</p> <p>d. There are no urbanising features within the site or directly influencing it;</p> <p>e. There are several urbanising features affecting the site; and</p> <p>f. There are many urbanising features affecting the site, which reduces its representativeness of the countryside. The site is perceived as previously developed land.</p>

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

A4.18 The subject of setting and special character in the context of historic towns should be examined on a site-by-site basis, by specialist heritage consultants. However, the conservation area local heritage designation allows the assessment to acknowledge that historic cores exist.

A4.19 **Table EDP A4.4** provides EDP's assessment criteria for Purpose 4.

Table EDP A4.4: Purpose 4: To Preserve the Setting and Special Character of Historic Towns

Purpose 4 Criteria	Application of Criteria to Site
In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to a conservation area (CA) which relates to the historic character of a town.	<p>The proximity of the site to the CA must also be balanced with the nature of intervisibility with the historic core of the CA, as this is a reflection of the extent to which the CA designation and its boundaries still applies (higher to lower contribution a-c):</p> <p>d. The site is partially or wholly within the historic character area of the town/CA;</p> <p>e. The site shares a boundary with or has Intervisibility with the historical character area/CA; and</p> <p>f. The site does not share a boundary with the town/CA and/or there is no intervisibility with its historic core/CA.</p>

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and other Urban Land

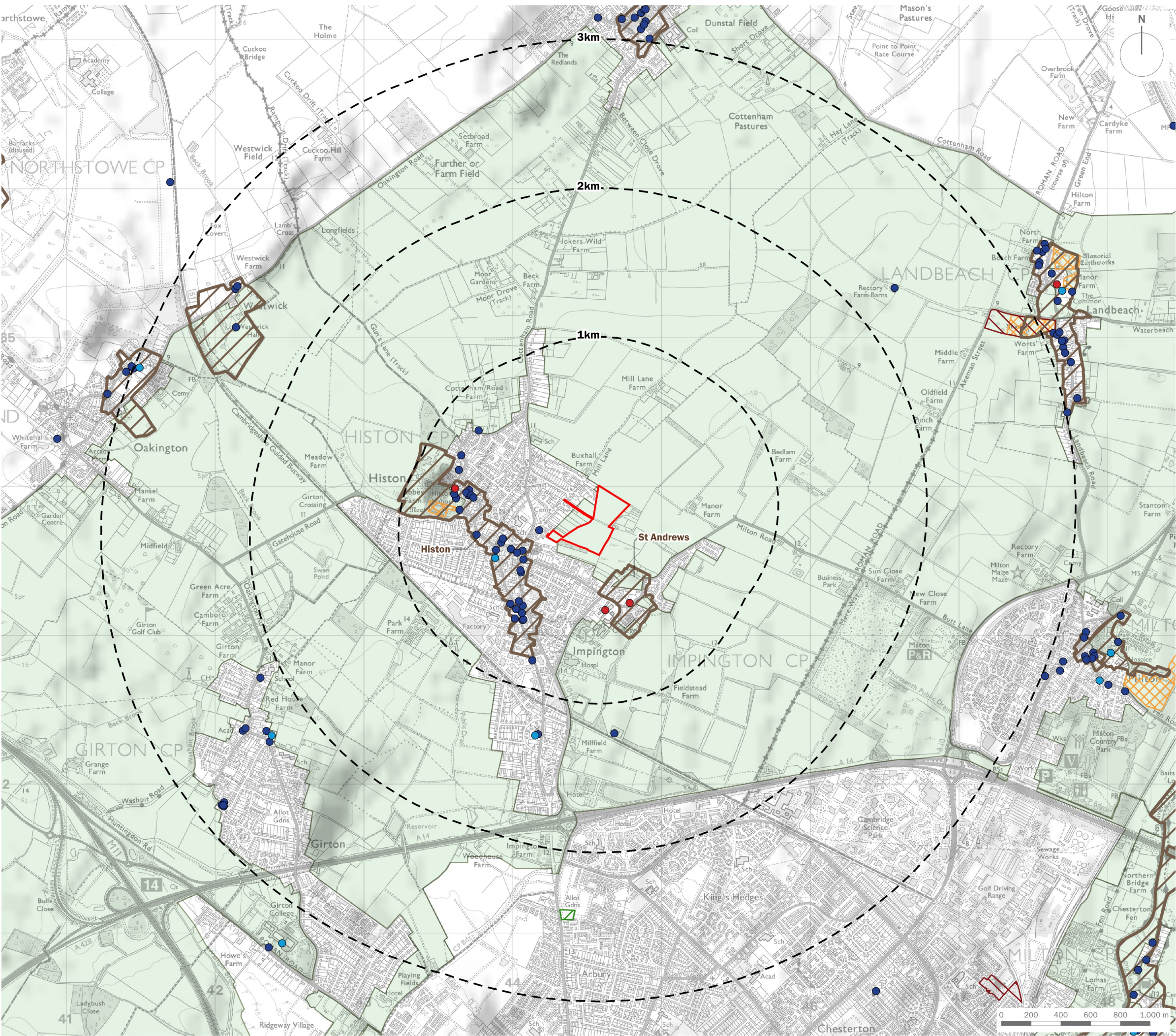
A4.20 Purpose 5 considers also whether or not sites can be 'recycled' or redeveloped, such as brownfield land within the GB. The amount of land within urban areas that could either be developed or regenerated is a planning matter that should already have been considered as part of a wider planning process, i.e. at the point of defining GB boundaries.

A4.21 The assessment of the site at a local level against this purpose would not enable a distinction between GB areas and, as such, Purpose 5 has been excluded from this assessment.

Plans

Plan EDP GB1 Landscape Planning Context
(edp5518_d017c 21 October 2024 NBo/TRa)

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Site Boundary

Range Rings (at 1km intervals)

Planning

Green Belt

Ecology

Local Nature Reserves

Site of Special Scientific Interest (SSSI)

Heritage

Conservation Area

Grade I Listed Building

Grade II Listed Building

Grade II* Listed Building

Scheduled Monument

client	Martin Grant Homes		
project title	Ambrose Way, Impington		
drawing title	Plan EDP GB1: Landscape Planning Context		
date	21 OCTOBER 2024	drawn by	NBo
drawing number	edp5518_d017c	checked	TRa
scale	1:25,000 @ A3	QA	GYo

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