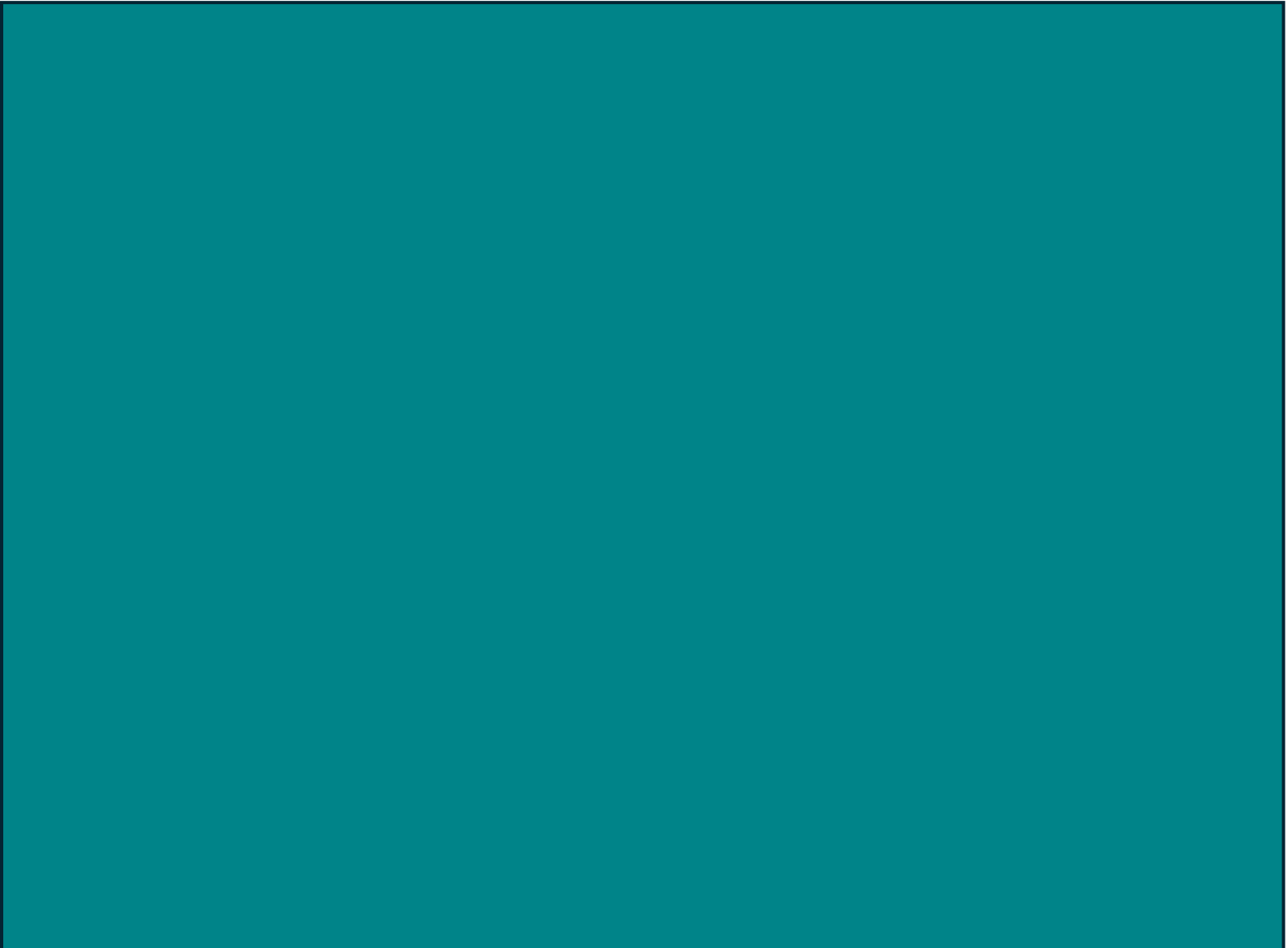


Land south of Butt Lane, Milton - Phase 1

Green Belt Assessment

Representation to GCSP Regulation 18 Local Plan

January 2026



Issue Sheet

Revision	Date	Drafted/Reviewed by:	Initials	Comments
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This document has been prepared and checked in accordance with ISO 9001:2015.

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1. Introduction and Summary

1.1. Appointment and Scope

LDA Design was commissioned by Turnstone Real Estate Limited to undertake a Green Belt Assessment in support of a new sustainable commercial development at Land south of Butt Lane, Milton (Site), located within the Cambridge Green Belt that surrounds the city of Cambridge. This Green Belt Assessment focuses on Phase 1 of the proposed development. The location of the wider Site and Phase 1 are illustrated on Figure 1. The Site is located within South Cambridgeshire District Council (SCDC).

The purpose of this report is to assess the performance of the land that comprises Phase 1 against Green Belt purposes and potential harm to the Green Belt in the context of the policy tests in paragraphs 153-155 of the National Planning Policy Framework (NPPF), as more fully set out in sections 2 and 3 of this report.

1.2. Summary

The assessment in section 5.2.5 of this report concludes that the Phase 1 land is grey belt and that the test in NPPF paragraph 155(a) is met. The remaining tests of paragraph 155 are addressed in other reports.

2. Policy Context

2.1. National Planning Policy Framework

Aim and purposes of the Green Belt

National Green Belt Policy is set out in section 13 of the National Planning Policy Framework (NPPF) (revised December 2024).

Paragraph 142 states:

"... 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".

Paragraph 143 sets out the purposes of Green Belt:

"Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

Development in the Green Belt

Paragraphs 153 onwards address development proposals affecting the Green Belt. Paragraph 153 states:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 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 arising from the proposal, is clearly outweighed by other considerations."

Paragraph 154 states that development in the Green Belt is inappropriate unless one of a number of exceptions applies. In this instance, none of the exceptions apply to the proposed development at the Site.

Grey Belt

Paragraph 155 contains a further exception to ‘inappropriate’ development, which applies to ‘grey belt’ land as follows:

“The development of homes, commercial and other development 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; ...”*

Sub-paragraphs b), c) and d) are outside the scope of this report.

Annex 2 of the NPPF sets out the following definition of grey belt:

“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘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.”

Footnote 7 exclusions do not apply to the Site.

In relation to the first sentence of the above definition, Planning Practice Guidance (PPG) sets out guidance on assessing whether land ‘strongly contributes’ to Green Belt purposes (a), (b), or (d) (reference id: 64-005-20250225, see section 3.2.3 below).

NPPF paragraph 155(a) refers to development which would ‘utilise grey belt land’. This makes clear that the question of whether land is grey belt applies specifically to the site of the proposed development, rather than to a wider area of land of which the site forms part. PPG paragraph 64-009-20250225 makes the same point. This point is relevant to consideration of any Green Belt assessment undertaken by the local planning authority (see section 2.5 below), since such assessments typically assess land parcels which may be larger than individual development sites.

2.2. Openness of the Green Belt

Green Belts were introduced to protect the countryside around urban areas from creeping urbanisation; as NPPF paragraph 142 says, *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open”*. Openness is therefore seen by policy as the means of preventing urban sprawl and, as paragraph 142 also states, it is one of the two essential

characteristics of Green Belts (the other being permanence). However, openness is not defined in the NPPF.

The PPG contains a paragraph headed *‘What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?’*. It states:

“Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgement 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*
- *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*
- *the degree of activity likely to be generated, such as traffic generation”*

(reference id: 64-013-20250225)

This excerpt from the PPG makes clear that assessing the impact of a proposal on the openness of the Green Belt requires a judgement based on the circumstances of the case. It identifies a number of matters (spatial and visual considerations, duration, irremediability and degree of activity) which may need to be taken into account but makes clear that this is not an exhaustive list.

Whilst the spatial aspect of openness is relevant only within the site where development is to take place, other aspects can be relevant to the wider Green Belt beyond the site boundary. For example, the inclusion of visual aspects when considering impact on openness indicates that openness should be considered not only in terms of the site itself but also in terms of the wider Green Belt. If development takes place on a Green Belt site that has a high level of visual containment, the development may not be visible from the wider Green Belt and consequently may not change the perception of openness within the wider Green Belt beyond the site boundary. On the other hand, a development that is highly visible from the wider Green Belt could affect the perception of openness within the wider Green Belt, thus increasing the harm to openness.

The degree of activity can similarly affect the perception of openness beyond the site boundary by signalling the presence of a development. Duration and irremediability are relevant to considerations of openness, both within the site of a potential development and within the wider Green Belt beyond the site boundary.

2.3. Green Belt Harm

Where the proposed development is 'inappropriate' (for example if the site does not meet the definition of 'grey belt' in section 2.1.3 above), it will need to meet the test for '*inappropriate development*' in the Green Belt as set out in NPPF paragraph 153. The test requires potential harm to the Green Belt "*by reason of inappropriateness*" to be considered. Inappropriateness is not defined in the NPPF or elsewhere but its meaning can be discerned from paragraph 154(h), which states that certain forms of development are not inappropriate "*provided they preserve its openness and do not conflict with the purposes of including land within it*". In relation to the specified forms of development, therefore, the tests as to whether or not they are inappropriate are whether or not they harm the openness of the Green Belt or conflict with Green Belt purposes. Paragraph 154(b) sets the same tests for buildings for outdoor sport and certain other uses.

In discussing how harm to the Green Belt should be considered in the case of development which is not inappropriate, the PPG (reference id: 64-014-20250225) states:

“... where development... is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by “very special circumstances”.”

This confirms that, where NPPF paragraph 153 applies, the harm to the Green Belt that needs to be assessed comprises impacts to openness (discussed in section 2.2 above) and to Green Belt purposes.

2.4. Local Policy

The Phase 1 land is within the authority of South Cambridgeshire District Council. Relevant adopted and emerging planning policy documents are as follows (refer to Figure 2 for planning context):

South Cambridgeshire Local Plan (2018)

Policy S/2: Objectives of the Local Plan

“The vision for the Local Plan will be secured through the achievement of 6 key objectives:

a. To support economic growth by supporting South Cambridgeshire's position as a world leader in research and technology based industries, research, and education; and supporting the rural economy.

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.

c. To provide land for housing in sustainable locations that meets local needs and aspirations, and gives choice about type, size, tenure and cost.

d. To deliver new developments that are high quality and well-designed with distinctive character that reflects their location, and which responds robustly to the challenges of climate change.

e. To ensure that all new development provides or has access to a range of services and facilities that support healthy lifestyles and well-being for everyone, including shops, schools, doctors, community buildings, cultural facilities, local open space, and green infrastructure.

f. To maximise potential for journeys to be undertaken by sustainable modes of transport including walking, cycling, bus and train.”

Policy S/4: Cambridge Green Belt

“A Green Belt will be maintained around Cambridge that will define the extent of the urban area. The detailed boundaries of the Green Belt in South Cambridgeshire are defined on the Policies Map, which includes some minor revisions to the inner boundary of the Green Belt around Cambridge and to the boundaries around some inset villages. New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework.”

Paragraph 2.30 states:

“The established purposes of the Cambridge Green Belt 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; and

Prevent communities in the environs of Cambridge from merging into one another and with the city.”

Paragraph 2.31 adds to this:

“A number of factors define the special character of Cambridge and its 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.”*

Policy NH/8: Mitigating the Impact of Development In and Adjoining the Green Belt

“1. Any development proposals within the Green Belt must be located and designed so that they do not have an adverse effect on the rural character and openness of the Green Belt.

2. Where development is permitted, landscaping conditions, together with a requirement that any planting is adequately maintained, will be attached to any planning permission in order to ensure that the impact on the Green Belt is mitigated.

3. Development on the edges of settlements which are surrounded by the Green Belt must include careful landscaping and design measures of a high quality.”

Policy NH/9: Redevelopment of Previously Developed Sites and Infilling in the Green Belt

“1. Redevelopment of Previously Developed Sites and Infilling in the Green Belt will be inappropriate development except for:

- a. The re-use of buildings provided that the buildings are of permanent and substantial construction, are consistent with Policies E/17 and H/17, provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt;*
- b. The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- c. The replacement of a building, provided the new building is in the same use, and not materially larger than the one it replaces;*
- d. Limited infilling, where infilling is defined as the filling of small gaps between existing built development (excluding temporary buildings). Such infilling should have no greater impact upon the openness of the Green Belt and the purpose of including land within it than the existing development. The cumulative impact of infilling proposals will be taken into account;*
- e. The partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”*

Policy NH/10: Facilities for Recreation in the Green Belt

“Proposals for new buildings to provide appropriate facilities for outdoor sport and outdoor recreation will be permitted where they will not (either individually or cumulatively) harm the openness of the Green Belt and the purposes of including land within it.”

Emerging Draft Greater Cambridge Local Plan

Cambridge City and South Cambridgeshire District councils are currently preparing the Greater Cambridge Local Plan. The Regulation 18 draft Local Plan is currently subject to public consultation until 30 January 2026. Relevant policies to green belt are as follows:

Policy S/GB: The Cambridge Green Belt

“1. A Green Belt will be maintained around Cambridge with the specific purposes to:

- a. preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.*
- b. maintain and enhance the quality of its setting; and*
- c. prevent communities in the environs of Cambridge from merging into one another and with the city*

2. The detailed boundaries of the Green Belt in Greater Cambridge are defined on the Policies Map. New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework. and having regard to the Cambridge Green Belt purposes set out above.”

2.5. Local Plan Evidence Base regarding Green Belt

As noted in section 2.1.3 above, the question of whether land is grey belt applies specifically to the Phase 1 land of the proposed development, rather than to a wider area of land.

The following Green Belt Assessments are relevant with respect to this Phase 1 GBA.

Cambridge Inner Green Belt Boundary Study (CIGBBS), 2015

The examination of the Cambridge and South Cambridgeshire Local Plans, which were adopted in 2018, was informed by the Cambridge Inner Green Belt Boundary Study (CIGBBS) undertaken in 2015 by LDA Design. The purpose of the CIGBBS was to assess how land within the inner Green Belt around the edge of Cambridge performs Green Belt purposes in order to inform decisions about potential releases of land from Green Belt for allocation for development.

Green Belt purposes are concerned with concepts such as ‘sprawl’, ‘encroachment’, ‘setting’ and ‘special character’. Without defining them more clearly, an assessment would inevitably rely on subjective judgements based on the author’s interpretation of the concepts. The approach taken in the CIGBBS

was to make the assessment as objective as possible by analysing the concepts underlying Green Belt purposes and identifying the particular qualities of Cambridge and its surrounding landscape that contribute to the performance of Green Belt purposes. In doing so, the CIGBBS drew from several previous studies that had identified qualities relevant to Green Belt purposes. Drawing these together, 16 qualities were identified that were used as criteria for the assessment in the CIGBBS.

The qualities identified that were relevant to Green Belt Purposes included:

- 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 the historic core from the edge of the city
- A city of human scale easily crossed by foot and by bicycle
- Topography providing a framework to Cambridge
- Long distance footpaths and bridleways providing access to the countryside
- Key views of Cambridge from the surrounding landscape
- Significant areas of Distinctive and Supportive townscape and landscape
- A soft green edge to the city
- Good urban structure with well-designed edges to the city
- Green corridors into the city
- The distribution, physical and visual separation of the necklace villages
- The scale, character, identity and rural setting of the necklace villages
- Designated sites and areas enriching the setting of Cambridge
- Elements and features contributing to the character and structure of the landscape
- A city set in a landscape which retains a strongly rural character

Greater Cambridge Green Belt Assessment (GCGBA), 2021

As part of the evidence base for the Greater Cambridge Local Plan, South Cambridgeshire District Council and Cambridge City Council published the Greater Cambridge Green Belt Assessment (GCGBA) (LUC, 2021). The GCGBA assesses all Green Belt within the two districts in terms of its contribution to each of the three Cambridge Green Belt purposes and the harm that would arise from development in terms of loss of contribution to Green Belt purposes and impact on adjacent Green Belt.

It should be noted that the GCGBA pre-dates the 2025 PPG guidance on assessing Green Belt purposes a), b) and d) and that it does not assess the

contribution parcels make to the national Green Belt purposes set out in the NPPF.

In considering the contribution to the Cambridge Green Belt purposes, the GCGBA makes use of the 16 qualities defined in the Cambridge Inner Green Belt Boundary Study (CIGBBS) undertaken in 2015 and in Chapter 3 (p.46 – 47) of the GCGBA maps these qualities against the Cambridge Green Belt purposes.

The Phase 1 land forms part of a larger parcel of land assessed within this assessment, referred to as Parcel MI1. Parcel MI1 is located to the northwest of Milton and comprises predominantly arable land, along with Milton Road Park and Ride, Milton police station (construction ongoing) and development at Rectory Farm. Parcel MI1 is crossed by Butt Lane, to the south. The A10 transport corridor forms the eastern edge of the parcel. The Phase 1 land, which comprises part of the southern end of the green belt parcel, is a much smaller area than Parcel MI1, forming approximately one quarter of its size.

GCGBA identifies the whole Parcel MI1 contributing as follows to the Cambridge Green Belt purposes:

Cambridge Green Belt Purposes	GCGBA Parcel MI1 (Site situated within)
Cambridge purpose 1: to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre	Relatively significant
Cambridge purpose 2: to maintain and enhance the quality of Cambridge’s setting	Moderate
Cambridge purpose 3: to prevent communities in the environs of Cambridge from merging into one another and with the city.	Moderate

3. Methodology

3.1. Introduction

The following flowchart illustrates the decision-making process required by NPPF paragraphs 153-155, as set out in section 2 above.

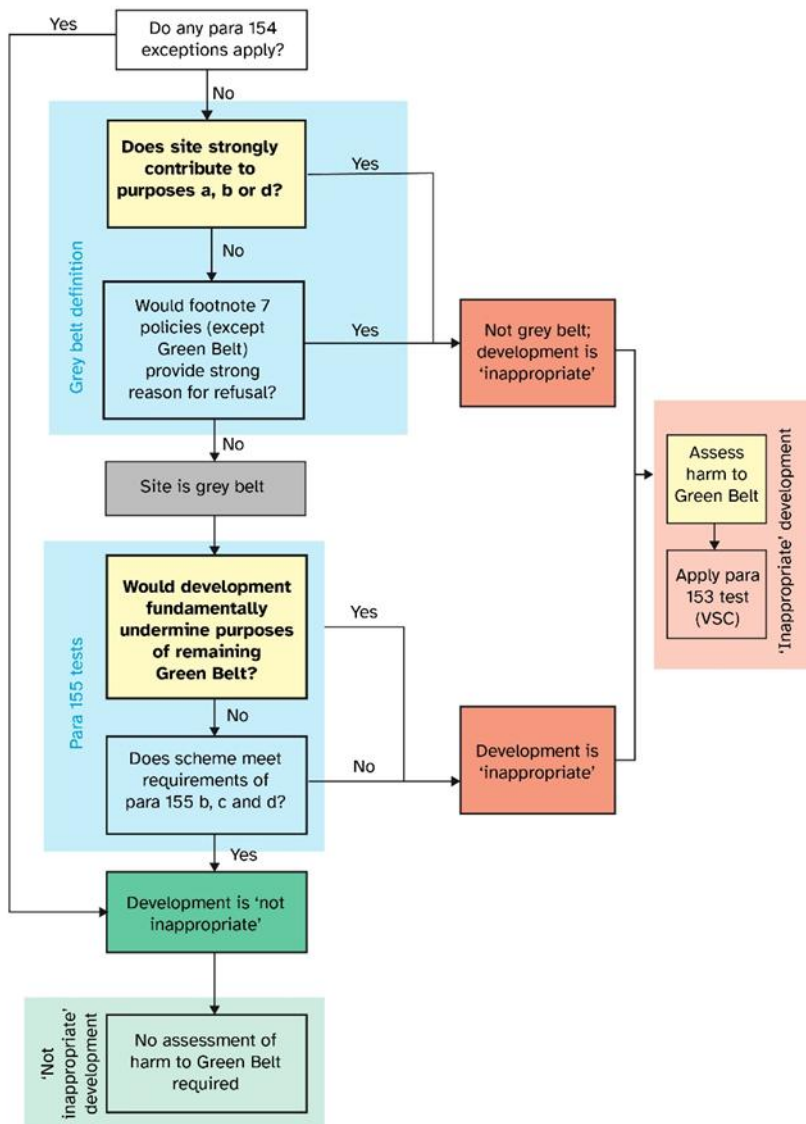


Diagram 1: Flowchart illustrating decision-making process required by NPPF

The assessments in this report are presented in two parts. The first part (section 5.0) contains the assessments relevant to grey belt and paragraph 155, which inform the Planning Statement’s conclusion as to whether the proposed

development would comprise ‘inappropriate’ development in the Green Belt. Where the assessment concludes that the proposed development is ‘not inappropriate’, it is not necessary to assess harm to the Green Belt (PPG reference id: 64-014-20250225).

In the event that the proposal is found to be ‘inappropriate’ development, an assessment of Green Belt harm is necessary to inform the application of the paragraph 153 test. The second part of the assessment (section 6.0 of this report) therefore includes an assessment of harm to the Green Belt in case this is required.

3.2. Phase 1 Land and Proposed Development

The Phase 1 Land and its Context

The first step in the methodology is an appraisal of the Site and its context, considering issues such as use, condition, built form, visual considerations, character and the relationship between the Site and its surrounding context.

Proposed Development

To inform the assessment, aspects of the proposed development that are relevant to Green Belt are identified and described. Proposals are described once all work is complete with any proposed planting mature to represent the resulting permanent development. This approach is taken given that para 142 of NPPF states that one of the essential characteristics of Green Belts are their ‘permanence’.

3.3. NPPF Paragraph 155 and Grey Belt

Grey Belt Definition

NPPF paragraph 155 applies to ‘grey belt’, which is defined in Annex 2. The first part of the definition requires an assessment as to whether the Site strongly contribute Green Belt purposes (a), (b), or (d). The assessment described in section 3.2.3 enables a conclusion to be reached on this point.

Green Belt Purposes

The definition of grey belt in Annex 2 to the NPPF refers to the contribution a site makes to Green Belt purposes a), b) and d). The methodology therefore assesses how the Site contributes in its current condition and use against these three Green Belt purposes. The PPG (reference id: 64-005-20250225) sets out guidance for how this assessment should be undertaken, using contribution values of Strong, Moderate, Weak and None. This guidance is reproduced below.

Purpose A – to check the unrestricted sprawl of large built-up areas

The PPG makes clear that this purpose relates to the sprawl of large built up areas, and that villages should not be considered large built up areas

Contribution	Illustrative features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development.</p> <p>They are also likely to include all of the following features:</p> <ul style="list-style-type: none"> - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	<p>Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to):</p> <ul style="list-style-type: none"> - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	<p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Purpose B – to prevent neighbouring towns margining into one another

The PPG makes clear that this purpose relates to the merging of towns, not villages

Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	<p>Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	<p>Assessment areas that contribute weakly are likely to include those that:</p> <ul style="list-style-type: none"> - do not form part of a gap between towns, or

- form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Purpose D – to preserve the setting and special character of historic towns

The PPG makes clear that this purpose relates to historic towns, not villages

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town

Paragraph 155(a) Test

If a site is grey belt, the second part of NPPF paragraph 155(a) requires an assessment as to whether the proposed development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

With reference to this point, the PPG (reference id: 64-008-20250225) states:

“In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.”

This requires consideration of the degree to which the wider Green Belt beyond the Phase 1 land currently performs all five Green Belt purposes, and how much (if at all) the proposed development would reduce their performance. This should be considered in the context of the entirety of the Green Belt within the Local Plan area.

The requirements of sub-paragraphs b), c) and d) of paragraph 155 are outside the scope of this assessment.

3.4. Effects on the Green Belt (see section 6.0)

If the proposal is found to be 'inappropriate' development, NPPF paragraph 153 applies and an assessment of Green Belt harm is necessary to inform the application of the paragraph 153 test.

4. The Phase 1 Land and Proposed Development

4.1. Site Context

As identified on Figure 1, the Phase 1 land is located to the west of the village of Milton, separated by the A10. The Phase 1 land is situated approximately 1km east of Impington and approximately 1.4km southwest of Landbeach.

Topography

The topography of the Phase 1 land and its surrounding area is shown on Figure 3. The surrounding landform is flat with the exception being land adjacent to the west and south of the Site which comprises made ground associated with Milton Landfill. The historic landfill site comprises an L – shaped plot of land approximately 48.5 hectares in area and is nearing full restoration. The wider context of the Site to the north and east is flat, with land gently rising to the west, towards Girton. The Thirteenth Public Drain, which is found in historic maps, aligns the perimeter of the Site.

Vegetation

Within the landscape surrounding the Phase 1 land, as shown on Figure 4, there are rectilinear blocks of woodland interconnected by well vegetated field boundaries comprising hedgerow with hedgerow trees.

The Phase 1 land itself is bound by extensive blocks of woodland which run adjacent to the western and part of the southern Site boundary. In addition to these peripheral woodland blocks, other tree belts aligning Milton Road Park and Ride and other woodland blocks along the periphery of Milton Landfill all serve to visually enclose the Phase 1 land.

The A10 is physically separated from the Site by a mixture of scrub, gappy hedgerow and sporadic trees.

Heritage

As shown on Figure 2, the historic core and conservation area within Milton is located within the northeast of the settlement and includes development along Ely Road, Fen Road and High Street. The historic core of Milton is defined by numerous listed buildings and Milton Road Conservation Area.

There is no visual relationship between the Phase 1 land and the historic core of Milton.

Other listed buildings within the context of the Phase 1 land are those associated with the settlements of Impington and Landbeach. There are also

Conservation Areas associated with Impington, Histon and Landbeach, all of which are situated within 3km of Phase 1 land.

There is no relationship between the Phase 1 land or these listed buildings, nor any other known heritage assets in the vicinity of the Phase 1 land.

Settlement Pattern

Milton has a semi-nucleated settlement pattern centred on its historic core around the High Street and Milton Conservation Area; where older cottages and village services cluster close together and include several listed buildings such as those along High Street and Fen Road. From this core, the village has expanded mainly southward and westward in planned suburban estates built in the late 20th century, giving it a more dispersed, residential suburban form than a tightly nucleated fen-edge village.

To the east, development associated with Milton is limited by Milton Fen, the River Cam and Milton Country Park, while the A14 forms a strong southern boundary that creates a clear separation from Cambridge. Industrial and commercial areas of Milton are located mainly on the southern edge, producing a mixed, but clearly zoned, settlement layout to the village.

The settlement pattern of Cambridge, situated to the south, is characterised by a historic core clustered around the River Cam. From the city centre, development spreads outward in a radial pattern, where later residential areas and commercial zones extend along major routes leading into the city. Suburbs such as Chesterton, Cherry Hinton, and Trumpington comprise low-density residential areas. Science parks and research hubs on the outskirts comprise specialised expansion to the north.

Visual Context (refer to Figure 5)

Predicted visibility towards the Phase 1 land and proposed development is demonstrated by the Zone of Theoretical Visibility (ZTV) illustrated within Figure 5. The ZTV model includes proposed buildings with heights of both 10m and 12m, within the western and eastern parts of the Phase 1 land respectively. The extent of theoretical visibility towards the proposed development covers a limited area of agricultural land to the north of the Site, towards Landbeach, as shown within Figure 5.

Following the Site survey, it was found that from the wider countryside, views towards the Phase 1 land are very limited. Existing vegetation and development within the context of the Phase 1 land filters and screen views from the local landscape from the south, west and east.

There are no views of the Phase 1 land from the south, along the A14 or from Junction 33. There are short distance filtered and direct views into the Phase 1 land within approximately 50m to the south, from the A10. Visibility from the A10 ceases beyond Butt Lane, to the north.

There is intervisibility between Butt Lane northwards across low lying agricultural fields towards Landbeach. However, visibility back towards the Phase 1 land from Landbeach is limited and heavily filtered by vegetation along Butt Lane and within/adjacent to Milton Road Park and Ride.

Immediate Context

The immediate context surrounding the Phase 1 land is as follows, illustrated on Figure 4:

- To the north, directly abutting the Phase 1 land, is situated the new Milton police station which comprises several separate buildings. Also situated to the north of the Phase 1 land is Milton Road Park and Ride. The Phase 1 land also aligns a very short section of Butt Lane.
- To the east lies the physical boundary of the A10. Beyond this highway is a mature tree belt which separates the Phase 1 land, A10 and the suburban western edge of Milton.
- To the south, Milton Landfill and Thirteenth Public Drain are situated adjacent to the Phase 1 land Boundary. Beyond Milton Landfill is the A14 and Junction 33 with the A10. Cambridge Science Park is situated further south, which abuts the northern settlement edge of Cambridge.
- To the west, Milton Landfill and extensive woodland blocks enclose the Phase 1 land. Beyond this, the landscape comprises flat agricultural fields with some commercial development at Evolution Business Park, off Milton Road.

4.2. Site Description

The Phase 1 land (approximately 10.5 hectares) consists of a triangular field to the east, adjacent to the A10, and a rectilinear field to the west. Both fields are separated by an existing mature hedgerow with trees. Internally, the Phase 1 land contains stretches of mature hedgerow with hedgerow trees.

Site Terrain

The Phase 1 land comprises broadly flat arable land at approximately 9mAOD (Above Ordnance Datum). The Phase 1 land is low lying and flat which is mirrored within the landscape to the north, being part of the wider Fen Edge landscape.

Site Fabric

The Phase 1 land is currently undeveloped and comprises arable land with dividing hedgerows. The Site periphery is well wooded to the west and partially wooded/well treed to the south and north. The eastern boundary, aligning the A10, comprises a mixture of scrub, gappy hedgerow and trees. This boundary is also fenced. Milton police station is partly separated from the Phase 1 land and enclosed by mature trees to the east, which also restrict views into the central and western Site areas, from the A10.

The remaining boundary between the Phase 1 land and Milton police station is predominantly unvegetated, however the vegetated perimeter of the Milton Road Park and Ride provides physical and visual enclosure to the north.

Visual Environment of Existing Site

The Phase 1 land is visually enclosed by a mixture of existing mature landscape features and built form such as development within the new Milton police station site to the north.

There are glimpsed and filtered views into the eastern area of the Phase 1 land from a short stretch of the A10, to the east. Views are limited to gaps in hedgerow and unvegetated sections of the eastern boundary.

Milton police station is currently under construction adjacent to the north of the Phase 1 land. Its scale and presence is clearly visible from within the Phase 1 land, the A10 and Milton Road Park and Ride. Milton police station screens views into the Phase 1 land from the north, beyond Milton Park and Ride. The singular building associated with Milton Road Park and Ride, although relatively modest in size, is also partially visible from the A10 and from within the Phase 1 land.

From the south, the Site is not visible from the A14 or highway Junction 33. Raised ground and peripheral woodland blocks associated with Milton Landfill restrict visibility into the Phase 1 land from the wider study area from the south and west. Raised ground within Milton landfill is visible from Milton Road Park and Ride, which contributes to the sense of enclosure

4.3. Proposed Development

The proposed development comprises an employment-led scheme including larger footprint units associated with trade counter and wholesale (up to 10m high) and smaller units for mid-tech offices/workshops and start-ups in the east (up to 12m high).

As demonstrated by the Illustrative Masterplan (contained in the accompanying Vision document prepared by LDA Design), the fen landscape has been key to influence the rectilinear approach to ditches and street trees across the Phase 1 land creating the opportunity to deliver wetlands, waterbodies and meadows that also provide habitat and sustainable drainage that help to be resilient to climate change.

With regard to scale and siting, at this early stage it is envisaged that new development in the western and central areas would not exceed external heights of 10m and new development in the east of the Site would not exceed external heights of 12m.

5. NPPF Paragraph 155 and Grey Belt

5.1. Introduction

With reference to NPPF paragraph 155 and the definition of grey belt in Annex 2 (see section 2.1.3 above), this section of the report addresses two matters:

- In relation to the definition of grey belt, whether the Site strongly contributes to any of purposes (a), (b), or (d) in NPPF paragraph 143 (see section 5.2);
- In relation to NPPF paragraph 155(a), whether the proposed development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (section 5.3).

5.2. Existing Contribution to Green Belt Purposes

This section assesses contribution made by the existing Site to Green Belt purposes a), b) and d), using the criteria set out in PPG. It also comments on the GCGBA assessment of the parcel within which the Site is located.

Purpose (a): To check the unrestricted sprawl of large built-up areas

The GCGBA does not directly assess purpose a). It considers that all inset settlements are deemed to be large built-up areas, however the Green Belt PPG makes clear villages are not relevant to this purpose. In this instance, Cambridge is the only relevant 'large built-up area'.

With reference to the criteria set out in PPG, the Phase 1 land is not adjacent to the large built-up area of Cambridge, but it is near to it. However, it is physically and visually separated from Cambridge by Milton landfill and the A14 to the south.

The Site is adjacent to the western edge of Milton, though physically and visually separated by both the A10 and established tree belts. Whilst the A10 broadly delineates the edge of the built-up area of Milton, within the vicinity of the Phase 1 land, Milton Road Park and Ride, Milton police station and the EV Charging Hub add built development west of the A10. Taking this into account, along with the physical containment of existing woodland, development of the Phase 1 land would not result in an incongruous pattern of development – indeed development already exists to the west of the A10.

The A10, Milton police station, EV Charging Hub, Milton Landfill and adjacent mature woodland blocks, which together bound the Phase 1 land, are features that restrict and contain development.

Accordingly, applying the PPG guidance, the Site makes a Moderate contribution to purpose a).

This conclusion is consistent with the determination of the EV Charging Hub application (Ref No: 25/01460/FUL), where the officer's report states:

"In response to criterion a), the site lies outside of any large built-up area and would not result in the sprawling of an existing built up area. Given the remoteness of the site, it is considered that the proposal would not undermine purpose a)."

The most relevant Cambridge Green Belt purpose to NPPF purpose a) is Cambridge purpose 1, for which the GCGBA scores the larger Green Belt parcel MI1 as 'Relatively Significant' which, on the GCGBA scale is higher than 'Moderate'. However, the Phase 1 land is not representative of the parcel as a whole. As referred to previously, the Phase 1 land forms a much smaller part of this Green Belt Parcel and has a greater degree of physical enclosure and more urbanising influences than the wider land parcel. In addition, the GCGBA considers villages as large built-up areas, so the assessment is not applicable to NPPF purpose a).

Purpose b): To prevent neighbouring towns merging into one another

This purpose is concerned with the merging of towns, not villages. Apart from Cambridge, the nearest towns are St Ives, Newmarket and Ely, all approximately 16km from the Phase 1 land. The Phase 1 land forms a very small part of the gap between Cambridge and any of these towns. Accordingly, the Phase 1 land makes **No** contribution to this purpose.

This conclusion is consistent with the determination of the EV Charging Hub application, where the officer's report states:

"Similarly with reference to criterion b), the proposal would not undermine the purpose of towns merging together due to the location of the site being adjacent to the A10 and not a town."

The GCGBA scores Green Belt parcel MI1 for Cambridge purpose 3 as 'Moderate'. However, Cambridge purpose 3 is concerned with the merging of villages as well as towns, so is not comparable with NPPF purpose b).

Purpose d): To preserve the setting and special character of historic towns

Broadly speaking, the entire extent of the Cambridge Green Belt falls within the wider setting of Cambridge. However, the degree to which different areas contribute to the setting varies widely across the Green Belt.

None of the four qualities identified in section 2.5.1 are especially apparent on the Phase 1 land – in particular, the Site does not exhibit the 'strongly rural

character' that typifies the landscape setting of Cambridge. It is subject to urbanising influences from adjacent development and road corridors. It is physically and visually separated from Cambridge by raised ground within Milton Landfill and the A14 to the south.

Accordingly, with reference to the PPG guidance, the Phase 1 land makes a Weak contribution to this purpose.

All three of the Cambridge Green Belt purposes are relevant to NPPF purpose d). The findings of the GCGBA in relation to the three Cambridge purposes are discussed in the preceding paragraphs. In each case, the GCGBA findings are in relation to Green Belt parcel MI1 as a whole and are not directly applicable to the Phase 1 land.

Summary of Existing Contribution to Green Belt Purposes

Green Belt Purpose	Existing Contribution Judgement
Purpose A: To check unrestricted sprawl of large built-up areas	Moderate
Purpose B: To prevent neighbouring towns and merging into one another	None
Purpose C: To preserve the setting and special character of historic town	Weak

Grey Belt

The above assessment demonstrates that the Phase 1 land does not strongly contribute to any of purposes (a), (b) or (d). As noted in the determination of the EV Charging Hub application, no Footnote 7 exceptions apply. The Phase 1 land therefore falls within the definition of grey belt set out in Annex 2 to the NPPF.

5.3. Paragraph 155(a) Test

As described in section 3.3.3, the second part of NPPF paragraph 155(a) requires an assessment as to how much (if at all) the proposed development would reduce the performance of all five Green Belt purposes by the wider Green Belt beyond the Phase 1 land. This should be considered in the context of the entirety of the Green Belt within the Local Plan area.

Purpose a) to check the unrestricted sprawl of large built-up areas

As stated at section 5.2.1 above, the Phase 1 land makes a Moderate contribution to purpose a). Milton is a village and as stated in the PPG, villages should not be considered large built up areas. The Phase 1 land is within

approximately 600m of the 'large built-up area' of Cambridge settlement boundary, but is both physically and visually separate from the city. The Phase 1 land's distinction from Cambridge comes from its relatively high degree of containment provided by the adjacent urban edge of Milton and the A10 to the east, Milton police station and Milton Road Park and Ride to the north, and a 50m wide woodland belt and Milton Landfill to the west and south.

Perceptually, the proposed development would be relatively well visually contained, with localised visibility from the A10 to the east and agricultural land to the north. It would be perceived as an extension of Milton rather than of the large built-up area of Cambridge. Consequently, it is assessed that the level of harm in relation to purpose a is None.



Plan 1: Illustrative Masterplan shown alongside the settlement edge of Milton, the A10 and Milton police station and Milton Park & Ride to the north of the Site.

Purpose b) to prevent neighbouring towns merging into one another

As noted at Section 5.2.2, the Phase 1 land makes no contribution to this purpose, with the nearest towns beyond Cambridge situated approximately 16km away. As such, there is no intervisibility or physical reduction between the Phase 1 land and nearest town. Consequently, it is assessed that the level of harm in relation to purpose 2 is None.

Purpose c) to assist in safeguarding the countryside from encroachment

Development of the Phase 1 land would, by definition, result in a degree of encroachment on the countryside in conflict with purpose c). However, in perceptual terms, the Phase 1 land is subject to urbanising influences, particularly adjacent development, nearby road infrastructure along its eastern boundary and also visibility towards and activity within Milton police station, EV Charging Hub and Park and Ride, all of which significantly diminishes the Site's sense of rurality.

Given that the Phase 1 land is well contained by the existing 50m wide woodland block to the west, and other vegetation aligning its southern and eastern boundary, the urbanising influence of the proposed development on the wider Green Belt beyond the Phase 1 land would be very limited and reduce further as the proposed planting establishes, as shown within the Illustrative Masterplan.

Overall, the extent of land encroached represents a small part of the rural fen landscape to the west of Milton. Countryside with a truly rural character lies north of Butt Lane, beyond Milton Road Park and Ride. The wider rural setting of the village will remain intact. The rural character of the remainder of the Green Belt, including the agricultural landscape north and further westwards of the Phase 1 land, will be retained due to the lack of visibility towards the proposed development. There will therefore be a Minor degree of harm in terms of conflict with this Green Belt purpose, i.e. that post development the baseline will be largely unchanged.

Purpose d) to preserve the setting and special character of historic towns

As noted at 5.2.3, the Site makes a Weak contribution to the setting and special character of the historic town of Cambridge.

The principal change that would arise from the proposed development is the addition of more built development to the east of the A10 around the existing Park and Ride, Police Station and EV Charging Hub. Whilst the Phase 1 land is currently undeveloped arable land, it is subject to significant urbanising influences.

This would be a **Negligible degree** of conflict with purpose d), i.e that post development the baseline will be fundamentally unchanged with barely perceptible differences.

Summary

Green Belt Purpose	Existing Contribution Judgement
Purpose A: To check unrestricted sprawl of large built-up areas	None
Purpose B: To prevent neighbouring towns merging into one another	None
Purpose C: To assist in safeguarding the countryside from encroachment	Minor
Purpose D: To preserve the setting and special character of historic town	Negligible

Overall, only Minor harm is identified in terms of conflict with one Green Belt purpose, and Negligible or No harm against three purposes. Given this low level of harm, which is confined to the immediate area around the Phase 1 land, it is clear that the proposed development would not affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way, and consequently it would not *“fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan”*.

In summary, the Phase 1 land has satisfied the tests of paragraph 155 a) in qualifying as Grey Belt land. The other tests in paragraph 155 are outside the scope of this report.

Appendix 1. Extracts from Greater Cambridge Green Belt Assessment

MI1

Parcel location and openness

Parcel size: 102.44ha

The parcel is located to the northwest of Milton and is dominated by arable land. It is crossed by Butt Lane to the south, where it also contains Milton Park and Ride. The A10 transport corridor forms the eastern edge of the parcel.

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

Land is not contained by inset development and extends a significant distance from the inset area. The A10 transport corridor and thick tree line is a strong boundary feature creating separation between the parcel and Milton to the east. Land containing Milton Park and Ride increases urbanising visual influence of land within the parcel to the south. The landform and land cover within the parcel do not create any additional distinction from Milton. Overall, there is strong distinction between the parcel and the inset area.

MI1

Contribution to the Green Belt purposes

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

Contribution: Relatively significant

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

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

Contribution: Moderate

Land predominantly comprises open farmland that has a strong distinction from the edge of Milton, meaning it has a strong rural character. Only a small area to the south contains development (Milton Park and Ride) that weakens rural character. Land contributes to the rural landscape setting experienced when approaching the wider city along the A10 from the north. Overall the parcel makes a moderate contribution to Cambridge Purpose 2.

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

Contribution: Moderate

Land is open and is peripheral to a moderate gap between Milton and Histon and Impington to the southeast. Land towards the north lies in a settlement gap between Milton and Landbeach and relevance towards Cambridge Purpose 3 is increased. Although the settlement gap is robust, there is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as narrowing the gap. Overall, the parcel makes a moderate contribution to Cambridge Purpose 3.

MI1

Impact on contribution of adjacent Green Belt

- Release of land as an expansion of Milton:

Rating: Moderate

The release and development of land within this parcel would significantly weaken the strong boundary distinction and increase urbanising containment of land to the south, while leaving this land more closely contained by the inset edge and the thick treelines to the west. The release would also significantly weaken the strong boundary distinction and increase urbanising visual impact on land to the northwest from the settlement and result in this area of land in becoming more closely contained by the inset settlement edge and the wider Green Belt to the west.

The release of this parcel would increase urbanising containment and urbanising visual impact of land to the north and would result in this area of land in becoming more closely contained by the inset edge and Landbeach to the north. Land to the northeast and to the southwest would also become more closely contained by the inset edge and the wider Green Belt, separated from the wider Green Belt by a thick tree line and hedgerows, respectively.

Any release and development of land within this parcel would reduce the settlement gap between Milton and Histon and Impington to the west, and breach the A10 transport corridor and associated tree line which is a strong boundary feature between this land and Milton. The additional impact would be greater if the northern part of the parcel is released and the settlement gap between Milton and Landbeach to the north is also reduced.

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

Overall harm of Green Belt release

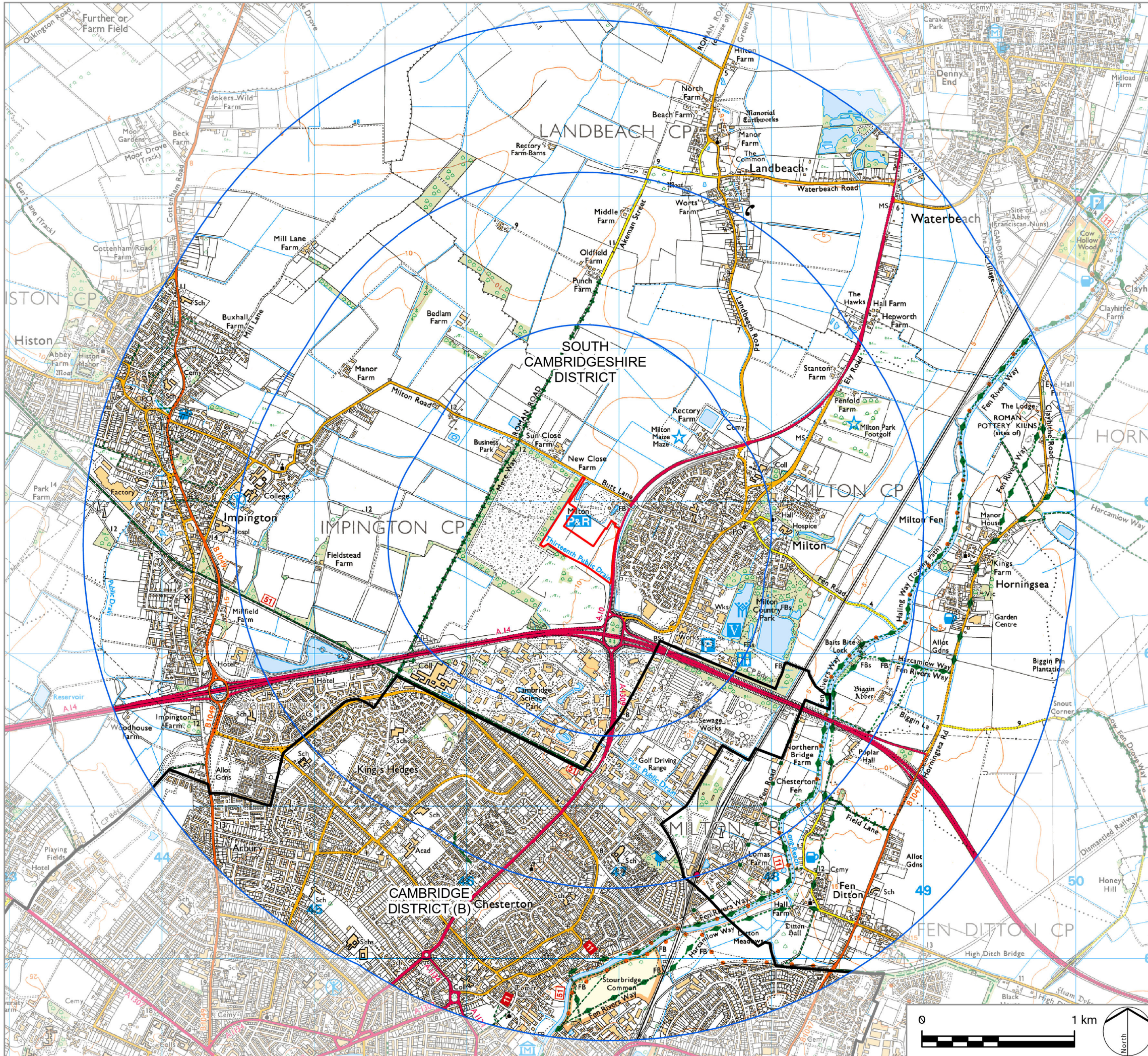
- Parcel MI1 makes a relatively significant contribution to preserving Cambridge's compact character, a moderate contribution to maintaining and enhancing the quality of Cambridge's setting, and a moderate contribution to preventing communities in the environs of Cambridge from

MI1

merging with one another. The additional impact on the adjacent Green Belt of the release of the parcel would be moderate. Therefore, the harm resulting from its release, as an expansion of Milton, would be very high.

Very High

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LEGEND

- Site boundary
- Distance from Site boundary (1,2 and 3km)
- Local Planning Authority (LPA) Boundary

LDĀ DESIGN

PROJECT TITLE
MILTON PARK

DRAWING TITLE
Figure 1: Site Location

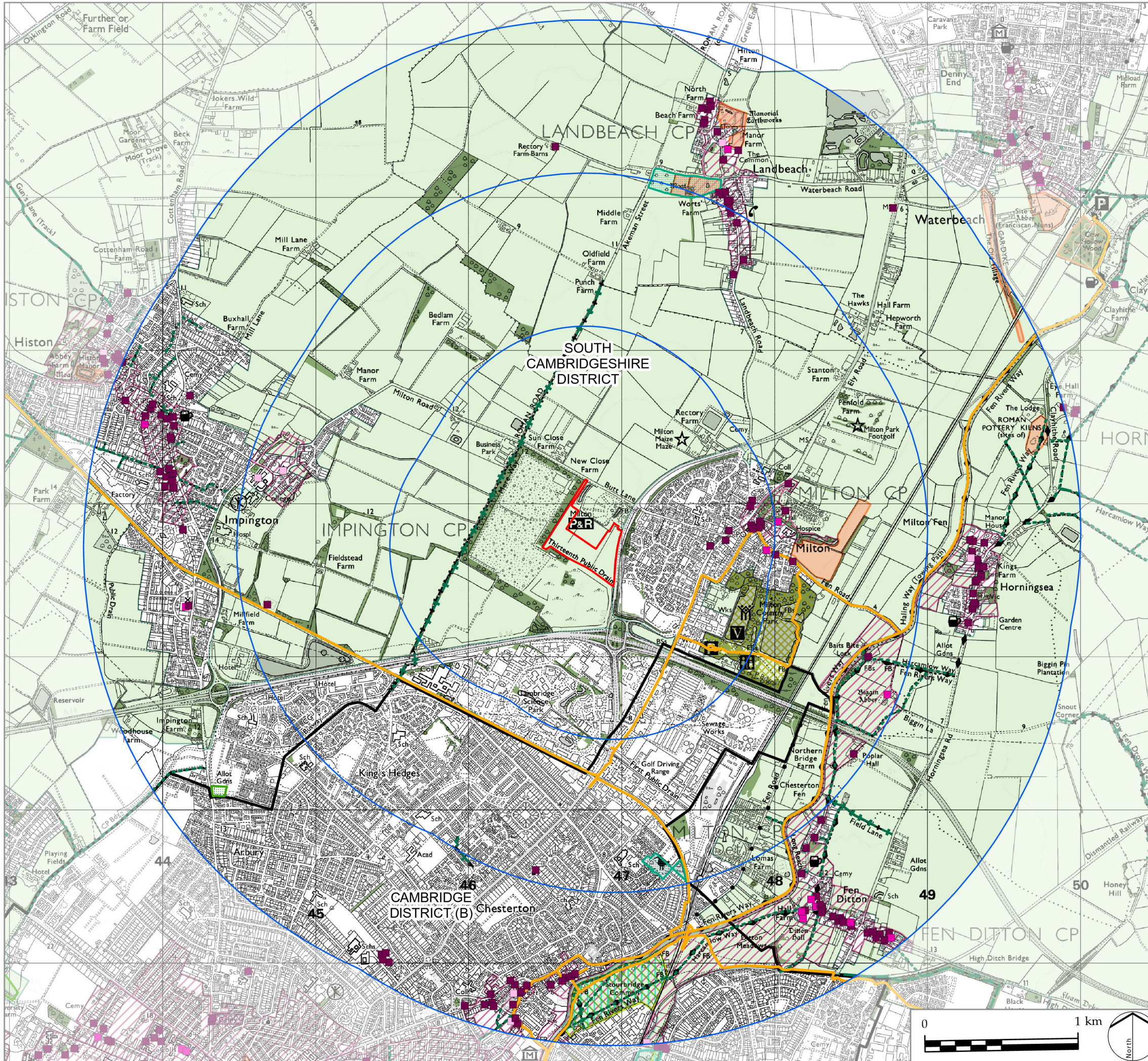
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Area measurements for indicative purposes only.

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Sources: Ordnance Survey



- LEGEND**
- Site boundary
 - Distance from Site boundary (1,2 and 3km)
 - Local Planning Authority (LPA) Boundary
 - Sites of Special Scientific Interest (SSSI)
 - Local Nature Reserves
 - Woodland
 - Scheduled Monuments
 - Registered Parks and Gardens
 - Conservation Area
 - Access Land
 - Registered Common Land
 - Section 15 Land All Types
 - Woodland Trust sites
 - Green Belt
 - National Cycle Network (Public)
- Public Rights of Way (PROW)**
- Footpath
 - Bridleway
 - + + + Byway open to all traffic
 - + T + Restricted Byway
- Listed Buildings**
- Grade I
 - Grade II*
 - Grade II

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MILTON PARK

DRAWING TITLE
Figure 2: Landscape Policy Context

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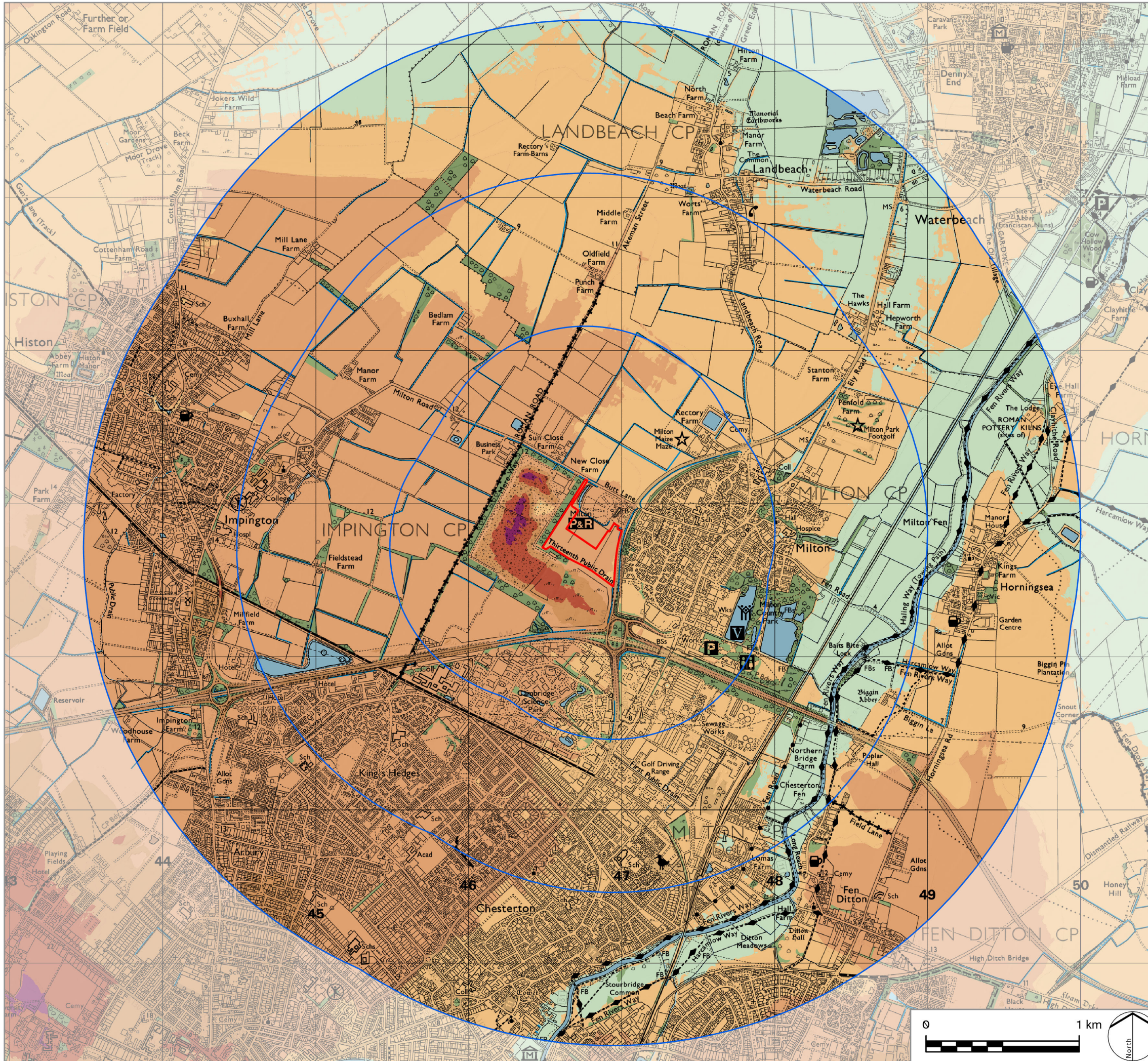
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LEGEND

- Site boundary
- Distance from Site boundary (1,2 and 3km)
- Water line
- Water area
- Woodland

Elevation (m AOD)

- 25 - 30
- 20 - 25
- 15 - 20
- 10 - 15
- 5 - 10
- 0 - 5
- 5 - 0

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Figure 3: Topography

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STATUS	Draft	APPROVED	NL

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LEGEND

 Site boundary

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PROJECT TITLE
MILTON PARK

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Figure 4: Aerial Photograph

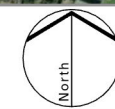
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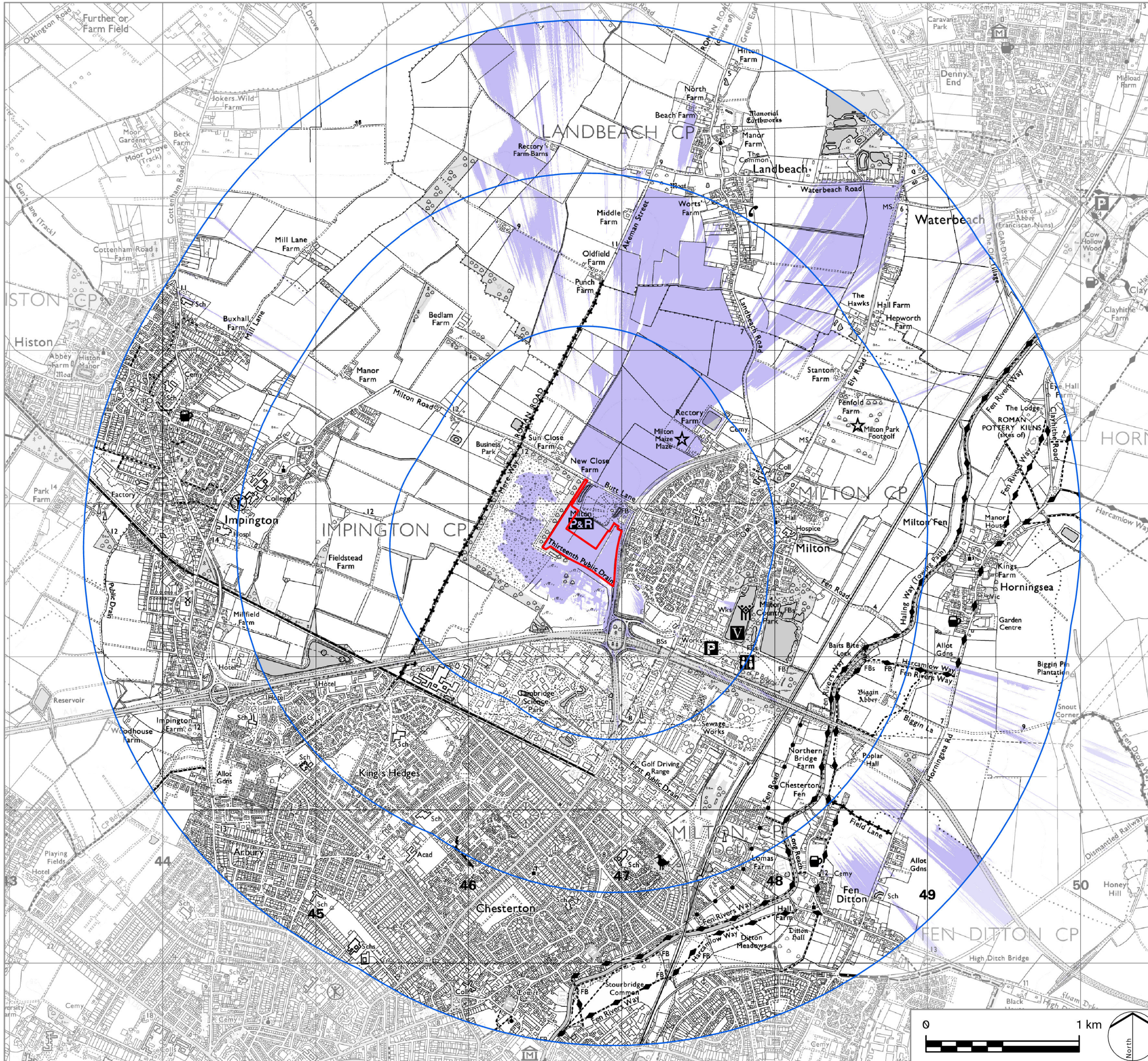
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Sources: Esri, Maxar, Earthstar Geographics, and the GIS Community



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LEGEND

- Site boundary
- Distance from Site boundary (1,2 and 3km)
- Zone of Theoretical Visibility (ZTV) (computer generated)
- based upon indicative varying building heights of both 10m and 12m

This drawing is based upon computer generated Zone of Theoretical Visibility (ZTV) studies produced using the viewshed routine in the ESRI ArcGIS Suite. The areas shown are the maximum theoretical visibility, taking into account topography, vegetation and buildings which have been included in the model with the heights obtained from a LiDAR digital surface model.

Due to its resolution, the surface model does not take into account every localised feature such as walls, small hedgerows or small trees and therefore only gives an impression of the extent of visibility.

The ZTV includes an adjustment that allows for Earth's curvature and light refraction. It is based on LiDAR terrain data with a 1m² resolution, resampled to 2m² resolution.

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PROJECT TITLE
MILTON PARK

DRAWING TITLE
Figure 5: Zone of Theoretical Visibility (ZTV) Study

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