

Ref: LR/03225/Pre-Application
4th November 2025

Sent by Email: [REDACTED]

Greater Cambridge Planning

Dear Sirs

**Request for Pre-Application Advice on behalf of [REDACTED]
Land at Fleam End Farm, High Ditch Road, Fen Ditton, Cambridge CB5 8TE**

On behalf of our client, [REDACTED] we write to request formal pre-application advice, including a meeting with officers, in relation to their emerging proposals for the residential development of land at Fleam End Farm, High Ditch Road, Fen Ditton.

Accompanying this letter, which provides a description of the site and a summary of relevant planning history, together with a description of the proposed development and the rationale behind it, is a completed pre-application advice form and the following drawings and documents:

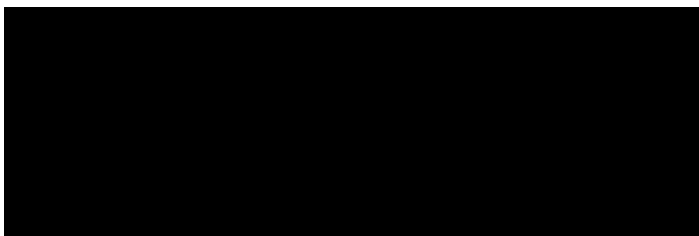
Enclosure	
1	Red Line Location Plan
2	Conceptual Plan
3	Indicative Proposed Site Plan
4	Briefing Note on Landscape, Visual and Green Belt Matters Prepared by EDP (standalone document)

We understand that Level 3 advice comprising a meeting and written advice for a scheme of up to 18 homes would generate a pre-application fee of £3,617.00 (incl. VAT) and can confirm that payment has been made as part of this submission.

Background

[REDACTED] are keen to realise the development of the site and made detailed submissions to the Council's 2025 'Call for Sites' with a view to securing a site allocation through the emerging Local Plan.

Being located on the edge of Fen Ditton immediately adjacent to the existing built-up area, it is considered that the site represents a good location for new housing. It is accepted that it is located outside the development framework of the village in the Green Belt, which adopted Development Plan policies presume against. However,



since those policies were adopted the National Planning Policy Framework 2024 (NPPF) has been published, introducing updated guidance on development in the Green Belt, including the introduction of the concept of Grey Belt.

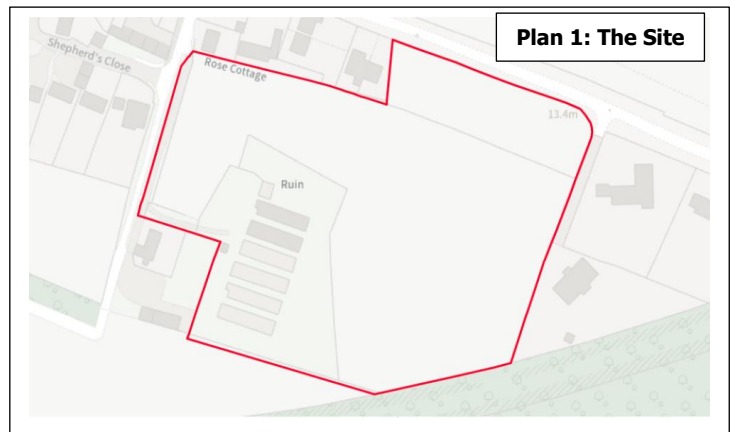
The main purpose of this submission is to obtain officers views on the principle of development, and in particular whether the site can be considered to qualify as Grey Belt, in order to assist our client determining whether they continue to promote the site through the development plan and/or consider the preparation and submission of a planning application at an appropriate time.

To inform discussions, an indicative scheme for up to 18 new homes is enclosed (**Enclosure 3**). The scheme has evolved from a thorough examination of site constraints and opportunities and seeks to respond positively to these to give an indication of the realistic level of built form that could be achieved while making adequate provision for any necessary mitigation.

The Site & Surrounding Area

The site, which is irregular in shape, extends to circa 2.2ha. It is located on the eastern edge of Fen Ditton just outside but contiguous with the village framework boundary and conservation area. The location and extent of the site is identified on **Plan 1**, with a full-sized version at **Enclosure 1**.

The site primarily comprises grazing land save for a series of outbuildings formerly associated with Fleam End Farm located in the southwestern part.



This site is bound to the north by High Ditch Road, to the west by Shepherd's Close, to the northwest and east by existing properties on High Ditch Road and to the south by the former railway line and Fleam Farm. Beyond the railway line to the south is the Cambridge East development. The site has a 100m frontage onto the southern side of High Ditch Road (between Nos.36 & 44), with the remaining area set behind Nos. 28-36.

A public footpath crosses part of the site, running in a southeast direction from Shepherd's Close to the former railway.

The site lies within the Green Belt. It does not lie within a conservation area, nor does it contain any listed buildings, however, the Fen Ditton Conservation Area does abut the northwestern boundary.

The site is not covered by any statutory landscape or ecology designations. It lies in its entirety within Flood Zone 1 and is therefore at a very low risk of flooding.

It is located within convenient reach of existing local facilities and services, including public transport services. The village offers recreation areas, community space (church hall), a primary school and three public houses: The Ancient Shepherds, The Kings Head and The Plough Inn. A local centre, including convenience store, butchers, pharmacy and health centre, is located on Ditton Lane (just outside the village). Bus routes pass through the village on the B1047. The village is well served by public footpaths and cycle routes which connect Fen Ditton to

the City, via Stourbridge Common. For other services, including higher order ones, the site is located in close proximity to the Cambridge East development and only 3 miles from Cambridge City centre.

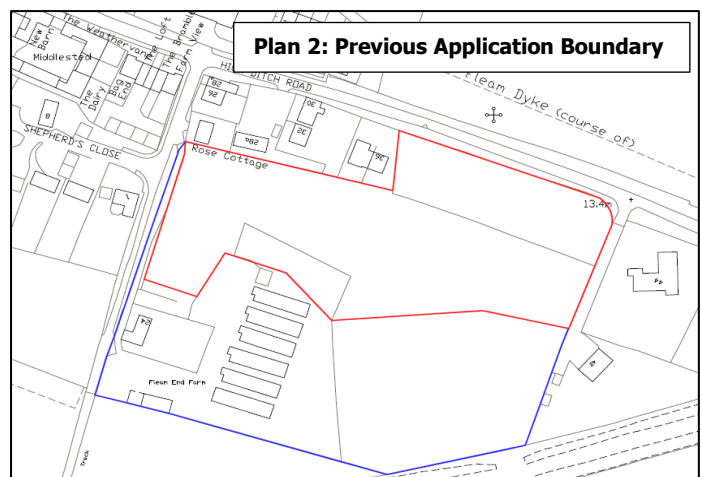
Lying in a gap between existing development the site enjoys a high degree of visual and physical containment. Its eastern boundary is well screened by a belt of mature trees and hedgerow which continues to the south along the edge of the former railway track. The character of the site is influenced by adjacent residential development, as well as the surrounding mature vegetation, which serves to enclose it visually from the surrounding area.

Indeed, as the accompanying Landscape, Visual and Green Belt Note produced by EDP (**Enclosure 3**) explains, public views into the site are limited to those in very close proximity in existing adjacent residential areas, short sections of High Ditch Road where it passes the site and the public footpath that crosses the site. Given this visual context, the site itself makes a limited contribution to the 'rural' or countryside character of the surrounding area. It is considered that development of the site would have a limited visual effect, with development sitting behind the dense boundary vegetation and existing development. This would be of a similar character to development already present within Fen Ditton, where properties are enclosed and contained from the 'open countryside' by woodland.

Planning History

The northern portion of the site extending to 1.2ha as shown on **Plan 2** was the subject of a planning application submitted in 2015 (Ref: S/1289/15/OL).

That application sought outline planning permission for a residential development of up to eighteen dwellings with all matters reserved save for access. It was withdrawn in January 2016 prior to determination.



The Proposed Development

While this pre-application request is primarily concerned with establishing the acceptability of the principle of development, an indicative scheme has been included to show one way in which the site could be developed and to generate discussion – please refer to **Enclosures 2 and 3**.

The indicative layout (**Enclosure 3**) shows a scheme for 18no. dwellings residential units in the northern part of the site served via a new access from High Ditch Road. The proposals, which are the same as those submitted as part of the 2015 application and are considered to remain a sensible way of developing the site, can be summarized as follows:

- Three detached dwellings are proposed along the High Ditch Road frontage with a new access road running between them. These dwellings would be sited in a similar position to High Ditch Road as the existing properties at Nos.34-36 but would be better screened from the highway by a new hedgerow.
- The access road leads through to an area of public open space overlooking the field beyond, before leading to further development to the rear of the properties at Nos.28-35.

- Development with an informal semi-rural character, which retains and extends the historic linear pattern of village settlement, whilst making the most of available land by infilling between existing development at the rear of the site.
- The new access road has been conceived as a subsidiary rural lane (to be surfaced in bound gravel) leading from the main road to the field beyond, a pattern of development not uncommon in the village.
- Principal pedestrian access to the village would be in the northwest corner of the site, via the retained public footway, creating a permeable and accessible layout.
- The design, scale and materials of future buildings would respond to the local vernacular and be informed by the Conservation Area Appraisal. There is potential to configure the buildings close to the existing farm in a courtyard arrangement which would relate more closely to the adjacent farm, and to link some of the properties to avoid an overly suburban layout.
- Built form has been carefully positioned to respond to existing dwellings and enable the integration of new homes with the existing ones. Proposed dwellings would be orientated so that they back on to and secure the private gardens of neighbouring properties off High Ditch Road and Shepherd's Close. The proposed gardens would be of sufficient depth to ensure the amenity of existing and future residents is protected.

The proposed development is concentrated in the northern part of the site so that the southern part of the site serves as a 'buffer' of open space. This area would be further enhanced following the removal of the existing agricultural buildings.

The exact mix would be a matter for consideration at the detailed stage; however, it is envisaged that the development would comprise a variety of house types, sizes, and tenures, from 2-4-bedrooms. This would consist of a mix of flats, terraced, semi-detached and detached properties, including bungalows, of which 50% would be affordable, providing new homes for a diverse, integrated community, from first-time buyers to the ageing community.

Planning Policy Context

The development plan relevant to the site comprises the South Cambridgeshire Local Plan, which sets the development strategy up to 2031, and was adopted in September 2018, and the Cambridge East Area Action Plan (AAP) adopted in February 2008.

South Cambridgeshire Local Plan 2018

Policy S/4 - Cambridge Green Belt explains that a Green Belt will be maintained around Cambridge that will define the extent of the urban area. ... New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework.

The Local Plan lists the purposes of the Cambridge Green Belt (paragraph 2.30) as being 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.*

Special characteristics of the setting to Cambridge are listed (paragraph 2.31) as follows. It is notable that these focus on the land which is intervisible with Cambridge and not the site at Fen Ditton:

- *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 S/5: Provision of New Jobs and Homes Development sets a requirement for the provision of 22,000 additional jobs to support the Cambridge Cluster and provide a diverse range of local jobs and 19,500 new homes, including affordable housing

Policy S/6: The Development Strategy states that the need for jobs and homes will be met as far as possible in the following order of preference - a. on the edge of Cambridge; b. at new settlements; c. in the rural area at Rural Centres and Minor Rural Centres. Development in the rural area will be limited, with allocations for jobs and housing focused on Rural Centres and Minor Rural Centres, and rural settlement policies providing for windfall development for different categories of village consistent with the level of local service provision and quality of public transport access to Cambridge or a market town

Policy S/7: Development Frameworks states that outside development frameworks, only allocations within Neighbourhood Plans that have come into force and development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside or where supported by other policies in this plan will be permitted. In the countryside development is generally restricted to uses that need to be located there. The plan includes some flexibility for reusing existing buildings, and for development which supports the rural economy.

The Local Plan classifies villages into four groupings, to reflect their relative sustainability. Fen Ditton is classified as a Group Village. Policy S/10: Group Villages states that residential development and redevelopment up to an indicative maximum scheme size of 8 dwellings will be permitted within the development frameworks of Group Villages. Development may exceptionally consist of up to about 15 dwellings where this would make the best use of a single brownfield site.

Policy HQ/1: Design Principles expects all new development to be of high-quality design and sets out a series of design principles that proposals are expected to comply with to achieve development that is safe and accessible and of an appropriate layout, scale and character conducive to its surroundings.

Policy H/10: Delivering High Quality Homes requires the provision of affordable housing to respond to an identified high level of need.

Cambridge East Area Action Plan 2008

The site lies to the north of the Cambridge East Urban Quarter development and falls within the AAP boundary for that development. The site is to the north and is separated from the Cambridge East development by the disused railway line. The AAP Proposals Map identifies the site, together with further land to the west as retained Green Belt in order to provide separation between Cambridge East and Fen Ditton.

Emerging Development Plan

Cambridge City Council and South Cambridgeshire District Council are working together to create a joint local plan for the two areas – known as Greater Cambridge. The plan is at a very early stage with consultation having taken place on the following documents:

- First Proposals: Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021); and
- Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023.

The early stage of the new plan is such that no weight can be given to its provisions.

Grey Belt

The site is located in the Green Belt wherein there is a general presumption against inappropriate development. Policy S/4 seeks to direct development away from the Green Belt explaining that new development will only be allowed where it complies with the provisions of the NPPF.

The National Planning Policy Framework (NPPF) attaches great importance to the Green Belt and its purposes and applies a Very Special Circumstances (VSC) test for inappropriate development, including new residential development. However, the updated version of the NPPF published in December 2024 introduced the concept of 'Grey Belt' land, which allows for development not to be regarded as inappropriate if specified conditions are met. These conditions are set out at paragraph 155 which states:

"The development of homes, commercial and other development in the Green Belt should also 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;***
- b. There is a demonstrable unmet need for the type of development proposed;***
- 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."***

Accordingly, proposals on land which constitutes 'Grey Belt', is in a sustainable location (as per NPPF paragraphs 110 and 115) and meets the 'Golden Rules' set out at paragraphs 156-157, would not be inappropriate and there would be no need to meet the high bar set by the VSC test.

Criteria (b.) of paragraph 155 requires there to be a demonstrable need for the type of development proposed. While it is considered that the proposals would meet the other criteria it is accepted that the Council considers it can currently demonstrate a 5 year supply of deliverable housing land, albeit it is understood that this is the subject of challenge by other parties. Accordingly, and as explained above, this pre-application request is concerned with criteria (a.) and establishing whether the site would be viewed as qualifying as Grey Belt.

Criteria a – Grey Belt

NPPF Paragraph 143 sets out the five purposes that the Green Belt serves, namely: 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.

'Grey Belt' is defined in the NPPF Glossary as:

***"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."* [our emphasis]**

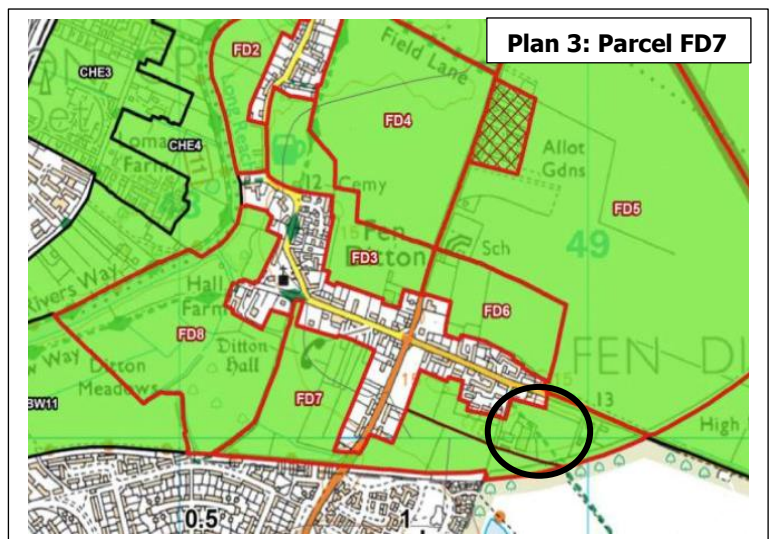
In considering whether and how the application site contributes to purposes (a), (b) or (d) regard must be had to the Planning Practice Guidance (PPG), which at paragraph 005 Reference ID: 64-005- 2025022 provides guidance in relation to informing judgements as to whether land can be considered as Grey Belt and at paragraph 008 provides guidance in relation to assessing the impact of releasing land or development on the remaining Green Belt.

A Grey Belt Assessment of the site produced by EDP is contained at (**Enclosure 4**). With reference to the conclusions of that assessment, we believe that Land at Fleam End Farm meets the definition of Grey Belt.

As part of the evidence base to support the emerging local plan is the Greater Cambridge Green Belt Assessment (GBA)¹. It predates the publication of the updated NPPF in 2024 and PPG in 2025.

The assessment is based on the three Cambridge Green Belt purposes, which EDP find to be an application of the NPPF purposes in the local context rather than additional purposes. The inter-relationship between the Cambridge purposes and those in the NPPF 2024 is set out at Table 4.1 of the EDP note.

In the assessment the site lies within Parcel FD7, comprising around a quarter of it (**Plan 3**). The assessment concludes that this parcel as a whole makes a moderate contribution to the three Cambridge purposes, and its release would result in a high level of harm overall.



¹ Greater Cambridge Green Belt Assessment Final Report, South Cambridgeshire District Council and Cambridge City Council, LUC, August 2021

The definition of 'Grey Belt' requires that land does not strongly contribute to any of purposes (a), (b), or (d). Based on the conclusions drawn by the GBA, our client's site does not strongly contribute to any of these three purposes having scored 'moderate' against them.

As the GBA was published prior to the PPG Green Belt guidance in February 2025, EDP have carried out their own assessment of the site's contribution to the purposes of including land in the Green Belt, having regard to the most recent guidance. The conclusions of this assessment are set out at Table EDP 5.1 of their note (**Enclosure 4**) and are reproduced below. These find that when considered against the updated guidance, which makes it clear that these purposes relate to towns and not villages, the site makes a weak/no contribution to each of the three purposes.

Contribution	Illustrative Features	Relevance to Site
Purpose A – to check the unrestricted sprawl of large built up areas*		
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: <ul style="list-style-type: none"> • Are not adjacent to or near to a large built-up area; or • Are adjacent to or near to a large built-up area but containing or being largely enclosed by significant existing development. 	The site sits adjacent to Fen Ditton, which is a village, so the site is not adjacent to or near to a large built-up area.
Purpose B – to prevent neighbouring towns merging into one another*		
Weak or None	Assessment areas that contribute weakly are likely to include those that: <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. 	The site sits adjacent to Fen Ditton, which is a village, so the site does not form part of a gap between towns.
Purpose D – to preserve the setting and special character of historic towns		
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: <ul style="list-style-type: none"> • Do not form part of the setting of a historic town; or • Have no visual, physical, or experiential connection to the historic aspects of the town. 	The site is adjacent to the Conservation Area of Fen Ditton, and has a visual, physical, or experiential connection to the historic aspects of the Village. However, the PPG is clear, this purpose relates specifically to 'Towns' and not village of hamlets. Fen Ditton is a Village.

*"This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas." (PPG Paragraph: 005 Reference ID: 64-005-20250225)

**"This purpose relates to the merging of towns, not villages." (PPG Paragraph: 005 Reference ID: 64-005-20250225)

In relation to grey belt the PPG continues:

"After consideration of the above criteria, any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be

identified as grey belt land, *subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.*

The site does not fall within and is not affected by areas or assets of particular importance as identified in footnote 7, such that the application of policies in the NPPF would not provide a strong reason to restrict development. It is acknowledged that the site lies adjacent to the Fen Ditton Conservation Area, but it is considered that the site is capable of being developed without any unacceptable harm to the Conservation Area or its setting and any application would be supported by a heritage assessment demonstrating this. On this basis it is concluded that the site comprises Grey Belt.

The development of the site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Namely, by reason of its small scale and well contained nature and the fact that the harm from the release of the site would be less than moderate, it would have no significant effect on the wider Green Belt. Further, as EDP explain, the site has not been identified in the extensive historic evidence base as forming any elevated importance gap or separation function, unlike land elsewhere in Fen Ditton. On this basis, it is considered that the development of the site would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole.

Overall, the development would comply with criteria (a) of Paragraph 155.

Conclusion

The site is Grey Belt as it does not strongly contribute to Green Belt purposes (a), (b) or (d) and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

Technical work undertaken has shown there are no environmental, physical, or legal impediments to the site's development. Given this and its location on the edge of Fen Ditton where services and facilities are available by a choice of sustainable modes to meet the needs of its resident population, the site represents a suitable source of housing land capable of delivering sustainable new homes, including 50% affordable. The indicative scheme shows how a development could be achieved that would integrate itself within the existing village environment, being sympathetic to nearby heritage assets and the wider conservation area setting.

The site is influenced by its urban fringe setting and is well contained by adjoining residential development. It is considered that the extent of mature vegetation within the site's localised and wider setting would ensure that any impact upon the wider countryside as a result of development would be localised. Therefore, whilst the development of the site would result in the loss of some greenfield land on the edge of Fenn Ditton, it would not represent an unacceptable encroachment into the countryside, being contained by existing urbanising features and form a logical extension to the village.

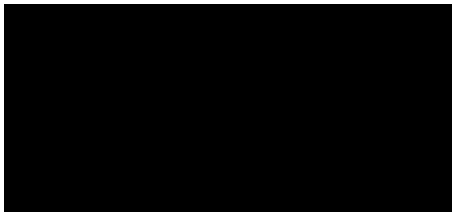
In the context of the above, discussion would be welcomed with officers regarding the following:

- 1. The principle of the proposed development, including whether the site can be considered to be 'Grey Belt'. In the event that the site is not considered to be Grey Belt the extent to which Very Special Circumstances exist to outweigh any harm to the Green Belt;**

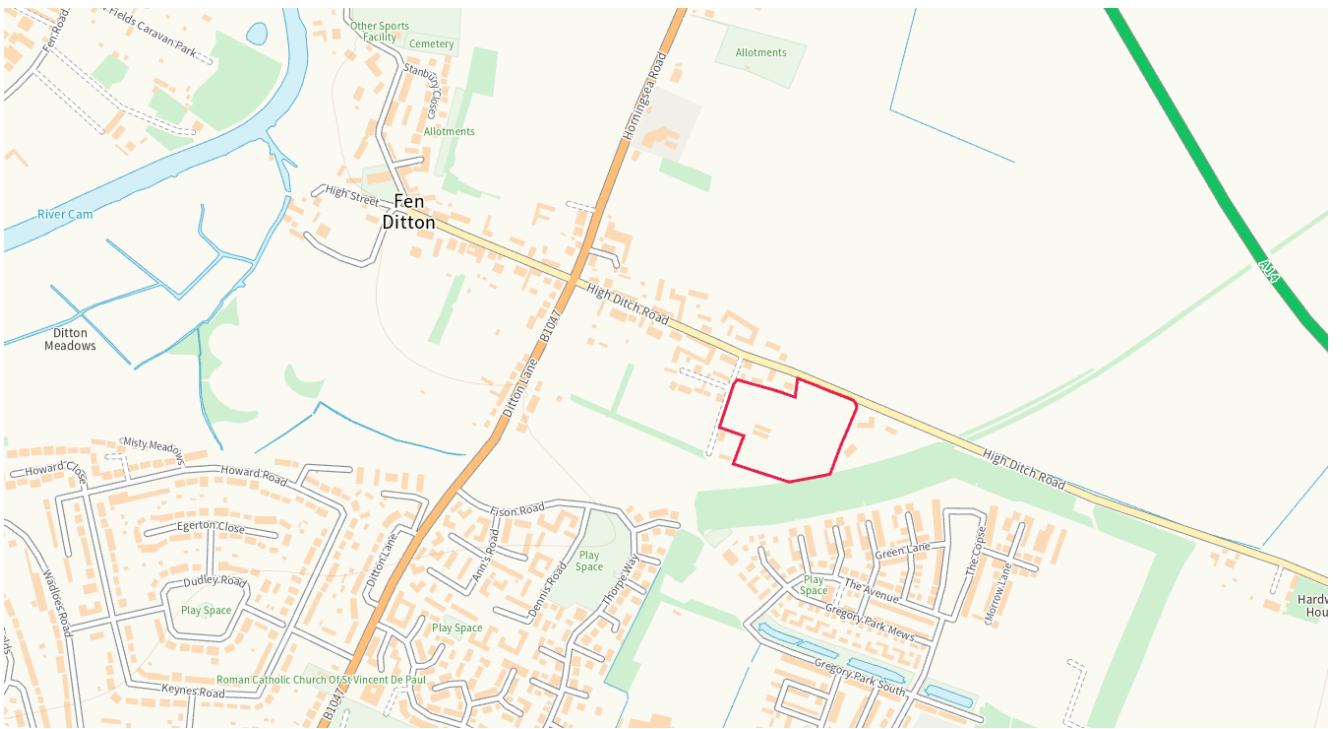
- 2. **Suitability of the site as a location for new housing development;**
- 3. **Response to initial scheme proposals;**
- 4. **Preferred market and affordable housing mix; and**
- 5. **Application documents.**

We trust that the enclosed information is sufficient for your immediate purposes and look forward to discussing the merits of the proposals further with officers. In the meantime, should you have any queries or require any further information, please do not hesitate to contact myself or my colleague, Geoff Armstrong.

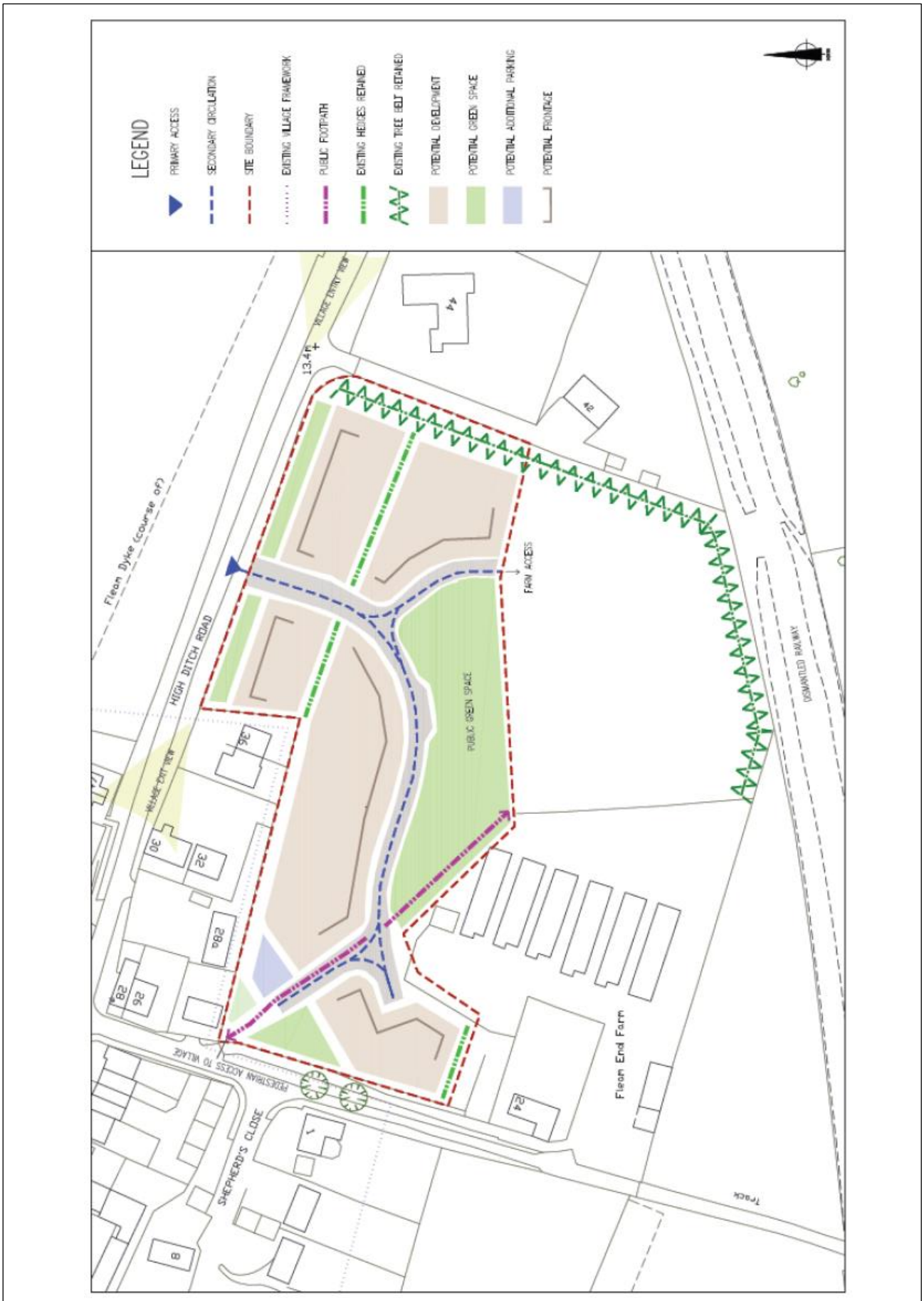
Yours faithfully



Enclosure 1 – Red Line Location Plan



Enclosure 2 – Conceptual Plan



Enclosure 3 – Proposed Indicative Site Plan

