

# Land At Fleam End Farm, High Ditch Road, Fen Ditton

## Landscape, Visual and Green Belt Note

### edp9398\_r001a

QA: WGa/NPR\_FMi/LLI\_041125

## 1 INTRODUCTION

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by [REDACTED] (hereafter referred to as 'the client') to prepare this briefing note on Landscape, Visual and Green Belt matters for Land at Fleam End Farm, High Ditch Road, Fen Ditton (hereafter referred to as 'the site'). The site lies at the southeastern edge of Fen Ditton within the South Cambridgeshire District Local Planning Authority (LPA) area.
- 1.2 It comprises an area of grassland and buildings (**Image EDP 1.1**), wooded southern boundary (**Image EDP 1.2**), with a tree belt along its eastern boundary and residential development to the north and north-west. There are also some semi-mature and mature trees and hedgerows located across the site.
- 1.3 The character of the site is influenced by adjacent residential development, as well as the surrounding mature vegetation (**Image EDP 1.2**), which serves to enclose it visually from the surrounding area.



**Image EDP 1.1:** Illustrating on-site character.



**Image EDP 1.2:** Illustrating on-site character and robust boundary vegetation which contains the site.

1.4 In terms of the sites designatory status as illustrated on **Plan EDP 1**:

- The site falls within the Green Belt (GB);
- The site falls outside any National Landscape (NL) (previously Area of Outstanding Natural Beauty (AONB));
- The site does not lie within, or within view of, a registered park and garden;
- The site does not lie within a Conservation Area (CA), nor does it contain any listed buildings. Fen Ditton Conservation Area abuts the northwestern boundary; and
- A Public Right of Way runs north-west to south-east across the site.

1.5 In visual terms, 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 minimal 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.

## **2 REVIEW AND APPRAISAL OF THE METROPOLITAN GREEN BELT EVIDENCE BASE**

### **National Policy**

#### ***National Planning Policy Framework (NPPF)***

2.1 The National Planning Policy Framework (NPPF) December 2024, updated 07 February 2025 (NPPF, 2024), states at paragraph 142 that:

*"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."*

2.2 The NPPF (paragraph 143) states that Green Belt serves five purposes, a to e (numbering added by EDP for ease of reference):

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

- 2.3 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”; and*

- 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*”.

- 2.4 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. 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); necessary improvement to national infrastructure; and quality and accessibility to green spaces."*

**National Planning Practice Guidance (NPPG)**

- 2.5 National Planning Practice Guidance (NPPG) Green Belt (published July 2019, last updated 27 February 2025) sets out advice on the role of the GB in the planning system.

- 2.6 The NPPG sets out a number of factors that need to be considered by GB assessments used in the determination of development applications stating that:

*"An assessment of Green Belt will (alongside other considerations) inform the determination of applications which involve reaching a judgement as to whether proposals utilise grey belt land and whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area.*

- *Where grey belt sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, in light of this guidance, on:*
- *Whether the site strongly contributes to the Green Belt purposes a, b or d; and*

- *Whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development; and*
- *Whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance."*

2.7 Regarding how GB assessments can be used in the determination of development applications the NPPG states that:

*"An assessment of Green Belt will (alongside other considerations) inform the determination of applications which involve reaching a judgement as to whether proposals utilise grey belt land and whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area.*

- *Where grey belt sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, in light of this guidance, on:*
- *Whether the site strongly contributes to the Green Belt purposes a, b or d; and*
- *Whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development; and*
- *Whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance."*

2.8 The NPPG also sets out *"the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land"*, purposes a, b and d.

2.9 It is notable in relation to this site, which sits adjacent to the village of Fen Ditton, that the considerations include the following statements:

- Purpose A - to check the unrestricted sprawl of large built-up areas - *"villages should not be considered large built-up areas."*; and
- Purpose B - to prevent neighbouring towns merging into one another - *"This purpose relates to the merging of towns, not villages"*.

### **Local Policy**

2.10 The South Cambridgeshire Local Plan was adopted in September 2018, in which Policy S/4 - Cambridge Green Belt is relevant. Policy NH/8 - Mitigating the Impact of Development in and adjoining the Green Belt, 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-draw the Green Belt boundary to align with the edge of the site.

2.11 Policy S/4 is clear in stating that the designation chiefly relates to Cambridge and not surrounding villages:

*"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."*

2.12 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."*

2.13 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."*

### **Emerging Local Policy**

2.14 Emerging Policy is set out in the following documents:

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

2.15 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.”*

### **South Cambridge Local Plan Issues and Options**

2.16 As part of the Local Plan process, the Issues and Options stage sought to identify land at the edge of Cambridge for release from the inner boundary of the GB. Thereafter, several studies were commissioned to look at the release of land around Cambridge and not the surrounding existing villages at the outer boundaries, as is the case with the site. In this planning context, Chapter 2 of the Local Plan, relating to Spatial Strategy, acknowledges that there should be development in villages for sustainability reasons (page 20).

### **Green Belt**

2.17 The latest GB study which forms a part of the Local Plan evidence base, is the Greater Cambridge Green Belt Assessment (GCGBA) Final Report, South Cambridgeshire District Council (SCDC) and Cambridge City Council (LUC, August 2021) (LUC, August 2021) (GCGBA).

2.18 There have been several GB studies that pre-date this evidence base document and contribute toward an understanding of the vision and setting of Cambridge and the Cambridge Green Belt:

- *Plan for Cambridge, Professor Sir William Holford and H Myles Wright (1950);*
- *The Cambridge Sub-Region Study (Colin Buchanan and Partners, September 2001);*
- *Inner Green Belt Study (CCC, 2002);*
- *Cambridge Green Belt Study: A Vision for the Future of Cambridge and its Green Belt Setting, Final Report (LDA, 2002);*
- *2012 Appraisal of the Inner Green Belt, May 2012;*
- *2012 Inner Green Belt Boundary Study, December 2012; and*

- *Cambridge Inner Green Belt Boundary Study (LDA Design, 2015).*

### **Plan for Cambridge**

- 2.19 Part of the vision of the 1950 document was to ensure “*villages near the city boundary would require 'Green Belts' between them and the town*”; whilst the second purpose of the 2001 Study was to “*prevent further coalescence between settlements*”.

### **The Cambridge Sub-Region Study, 2001**

- 2.20 The Cambridge Sub-Region Study (Colin Buchanan and Partners, September 2001) contains a Green Belt Review at Section 7, which established the primary purposes of the GB, the Special Character of Cambridge in addition to its historic core and associated university colleges and defines the setting to the City.
- 2.21 The study identified a number of sites for further study, but these did not include the site.

### **Inner Green Belt Study, 2002**

- 2.22 As set out in the study:

*“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.*

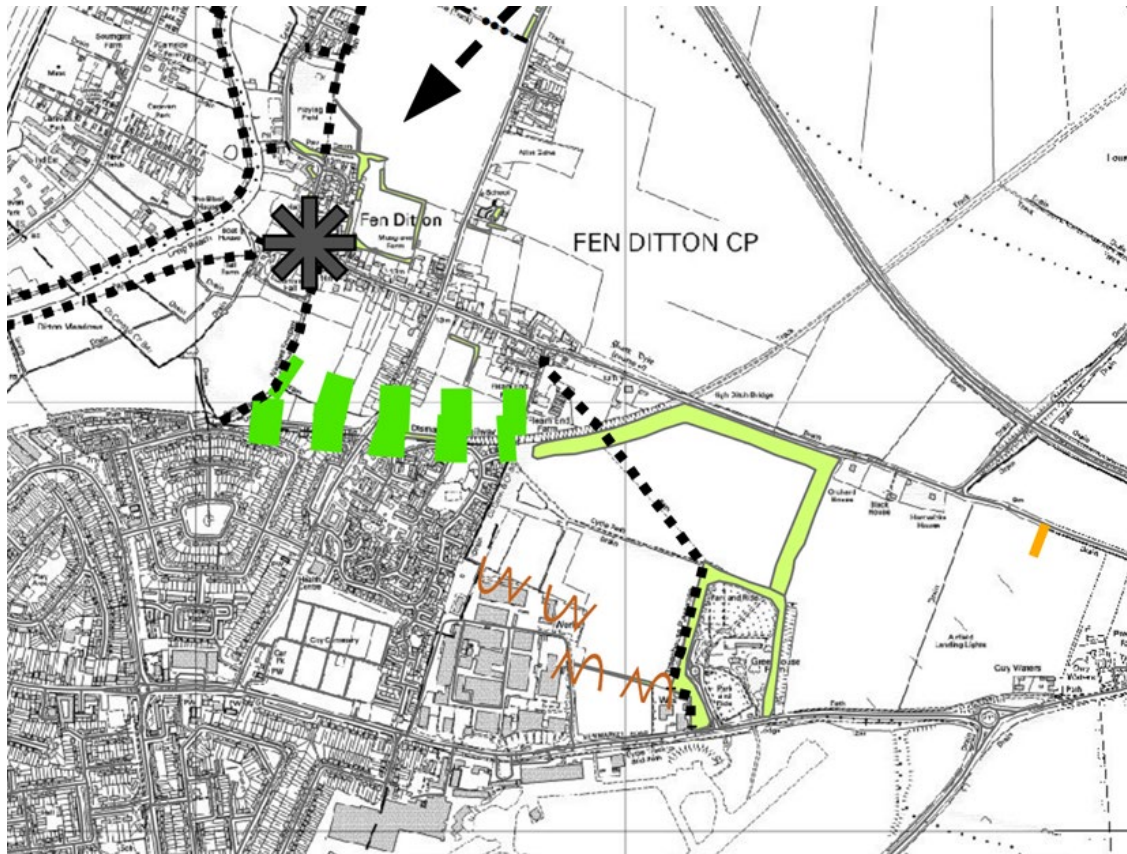
*The results of the survey are set out in the Sector Tables within the report, although no accompanying plan is available (reference to 'Plan X' only within the report) showing where the sectors are located.”*

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

- 2.23 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.
- 2.24 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).
- 2.25 With its focus on the eastern sector of the Cambridge GB, the study includes Fen Ditton (and the site) as part of the ‘*Fen Ditton Eastern Fen Edge*’, which is part of a larger transitional landscape between the Fenlands and the Chalklands. Of broad relevance, the study 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*”.

**2012 Appraisal of the Inner Green Belt, May 2012**

- 2.26 The *Appraisal of the Inner Green Belt*, May 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.
- 2.27 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.
- 2.28 The appraisal drew conclusions on broad zones of the city edge, which had more or less importance when measured against GB criteria. The site is located within broad zones 18, Area 2, which like much of the GB surrounding Cambridge is identified as having 'High' GB Importance and 'Very High' significance to development within the GB. Of more relevance is the analysis presented on Plan 3 of the study (**Image EDP 2.1**) which identifies land to the west of the site as being a 'significant gap' (but not the site), and the robust vegetation which contains the site to the south and east.



**Image EDP 2.1:** Extract of Plan 3 from 2012 Inner Green Belt Study

**2012 Inner Green Belt Boundary Study, December 2012**

- 2.29 Further to the examination of the emerging Local Plans, the inspector's preliminary conclusions set out in a letter dated 20 May 2015 stated 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..."*

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

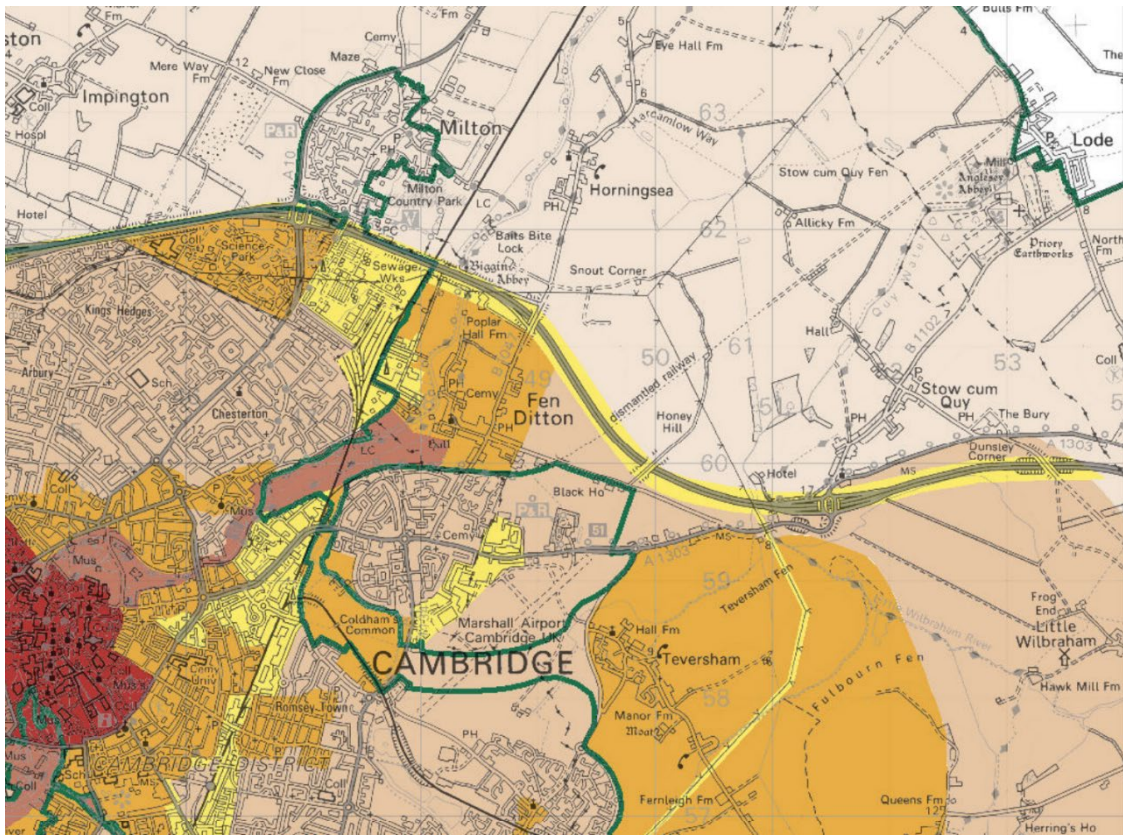
**Cambridge Inner Green Belt Boundary Study, 2015**

- 2.31 Cambridge Inner Green Belt Boundary Study, 2015, was commissioned jointly by Cambridge City Council and SCDC 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.

- 2.32 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).

- 2.33 The site falls within the 'Connective townscape landscape', as illustrated in **Image EDP 2.1**.



**Image EDP 2.2:** Cambridge Inner Green Belt Boundary Study 2015. Figure 11: Townscape and Landscape Role and Function.

#### 2.34 Connective Townscape/Landscape are (emphasis added by EDP):

*“Areas of townscape/landscape which are an integral part of the city and its environs, but may lack individual distinction or **do not make a significant contribution to the setting of the city**. This does not signify that these areas are unimportant, or lacking in their own identity; they may have significant merit in their own right. Rather, they are often areas with little relationship to their landscape setting, or to landmarks within the Historic Core or its landscape setting. Due to their location or character, they may contribute little to views of the city or other elements of its setting. Generic development forms with little sense of place can also contribute to the loss of local identity.*

*Areas of Connective townscape/landscape include much of the large scale suburban development to the north, east and south of the city. These areas are not distinctive to Cambridge but act as a relatively modern urban framework to Supportive and Distinctive parts of the city and landscape.*

*Connective landscape forms the remainder of the landscape from where the city is visible, or where it forms part of the foreground to more distant isolated viewpoints, with the exception of the detracting features or areas shown on Figure 11.” (paragraphs 4.14.17 - 4.14.18).*

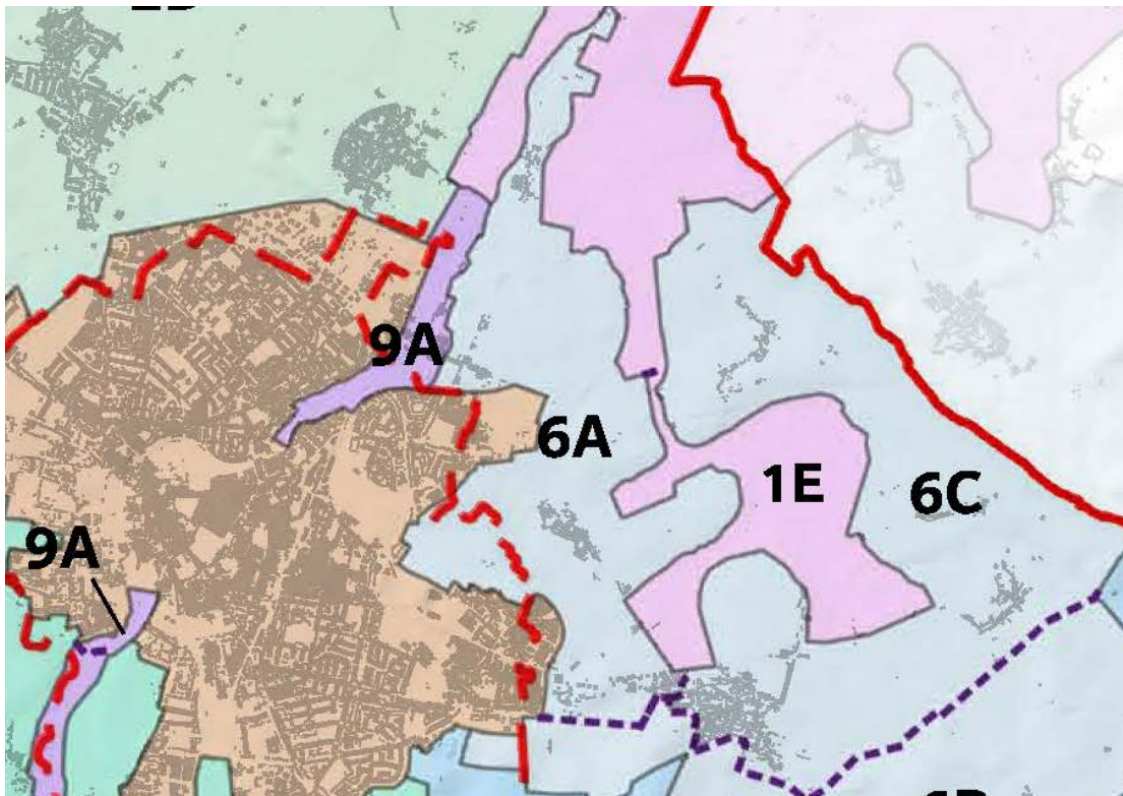
### **Fen Ditton Conservation Area**

- 2.35 The extent to which the site impacts on the historic setting to the heritage asset falls outside of the remit of this report. 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 and Purpose 2 “*to maintain and enhance the quality of its setting*”.
- 2.36 Fen Ditton Conservation Area (CA) is located to the immediate north and north-west of the site. A Conservation Area Appraisal was published in 2006; it identifies Fen Ditton as a largely linear settlement and indicates that development within the site may result in harm to the significance of the setting to the village and the conservation area. Undoubtedly, due to its location, development within the site would result to a degree to the loss of the green/undeveloped backdrop to the current linear settlement pattern of the village.

## **3 LANDSCAPE CHARACTER AND VISUAL CHARACTER**

### **Landscape Character**

- 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 and the South Cambridgeshire Local Plan (adopted 2018).
- 3.2 The relevant published Landscape Character Assessment is *Greater Cambridge Landscape Character Assessment* (CBA 2021) which forms a part of the Local Plan evidence base.
- 3.3 The site falls within Landscape Character Area (LCA) 6a: *Fen Ditton Fen Edge Chalklands*, a part of Landscape Type (LT) 6: *Fen Edge Chalklands*.



**Image EDP 3.1:** Greater Cambridge Landscape Character Assessment. Figure 4.1.

3.4 LCA 6a: *Fen Ditton Fen Edge Chalklands* is “a settled landscape with small, linear villages and discordant influences introduced due to the proximity of the urban edge of Cambridge.”

3.5 The Key Characteristics of the LCA are:

- Irregular pattern of large, rectilinear fields contrasts with small scale, more regular field patterns around settlement edges;
- Well-trimmed hedges, boundary trees and shelterbelts provide a distinctive localised vegetation pattern near villages;
- Settled rural landscape comprising small villages with historic linear cores and isolated farms; and
- Urban influences due to proximity to the urban edge of Cambridge including large-scale transport infrastructure and hospital.

### **Visual Amenity**

3.6 EDP's field assessment found that visibility to the site is substantially limited by vegetation and settlement at and beyond the site boundary, so that the effect of any residential development of the site is likely to be limited to property and roads at the immediate settlement edge and the Public Right of Way (PRoW) which crosses the site.

3.7 Where the site is apparent from the wider landscape, views to the proposals would be substantially limited to views over, or filtered by, site boundary vegetation and the proposals

would be seen in the context of the existing settlement and would not appear out of character or incongruous.

#### 4 GREATER CAMBRIDGE GREEN BELT ASSESSMENT FINAL REPORT, 2021

4.1 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.

4.2 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.

4.3 The three Cambridge GB purposes are listed below, with the inter-relationship between Cambridge purposes and the NPPF 2024 purposes set out in within **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.

Cambridge Purpose	NPPF Purpose	Comment
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.
3. 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 those within the inner necklace and those more distant.

- 4.4 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 FD7 as illustrated in **Image EDP 4.1**. The site comprises approximately less than a quarter of the parcel.

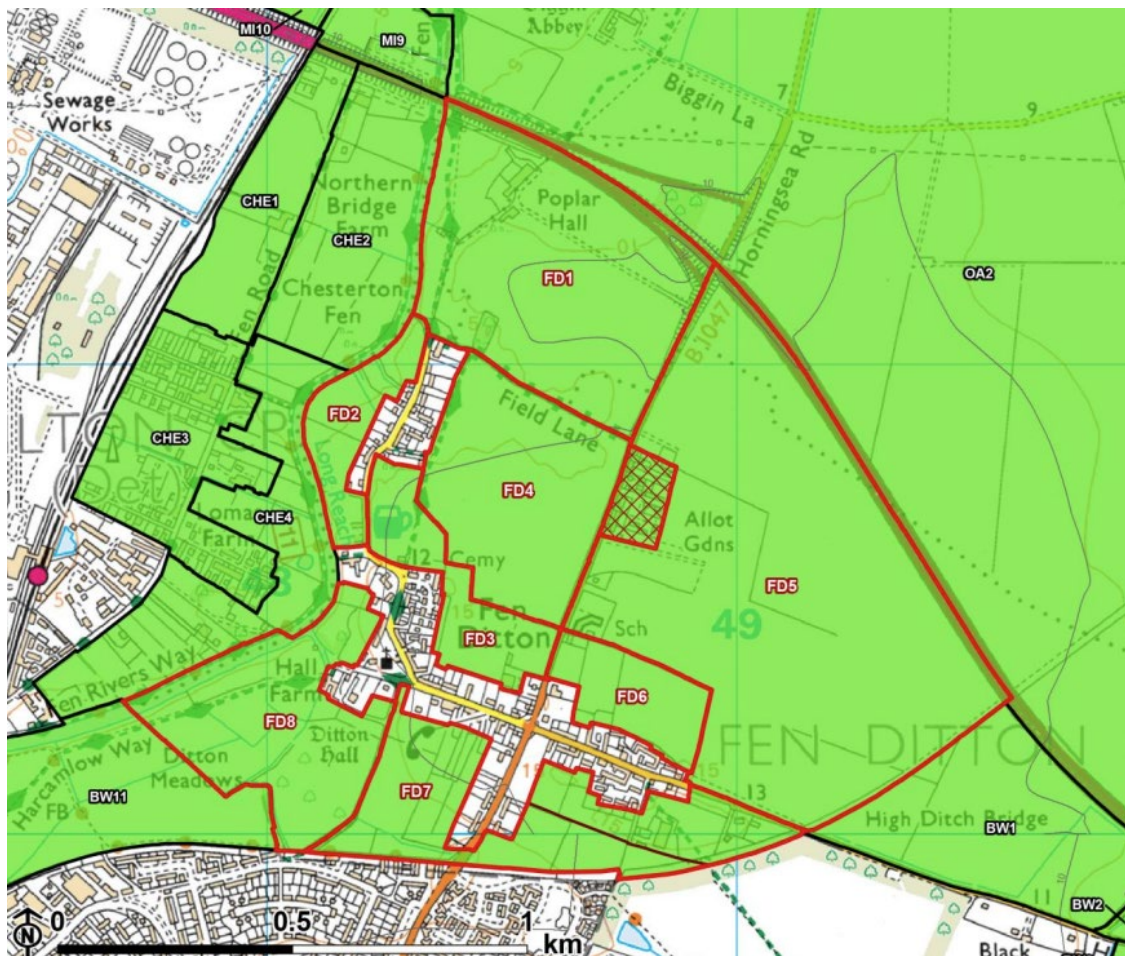


Image EDP 4.1: Parcel FD7

4.5 Each parcel was then assessed in terms of:

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

## 5 ASSESSMENT AGAINST 2025 NPPG CRITERIA

5.1 The Planning Policy Guidance (PPG) considers how GB assessments can be used in the development management process stating that:

*“An assessment of Green Belt will (alongside other considerations) inform the determination of applications which involve reaching a judgement as to whether proposals utilise grey belt land and whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area.*”

Where grey belt sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, in light of this guidance, on:

- Whether the site strongly contributes to the Green Belt purposes a, b or d; and
- Whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development; and
- Whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance.” (Paragraph: 009 Reference ID: 64-009-20250225)”

**Does the Site Contribute Strongly to Purposes A, B and D: Making an Assessment of Whether Land is Grey Belt**

5.2 PPG Green Belt paragraph: 005 (Reference ID: 64-005-20250225) states that “when making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d”. It then provides considerations for informing these judgements.

5.3 **Table EDP 5.1** sets out an assessment of the site against these considerations.

**Table EDP 5.1:** Assessment of Site Against Green Belt Purposes A, B and D Using PPG Considerations

Contribution	Illustrative Features	Relevance to Site
<b>Purpose A – to check the unrestricted sprawl of large built-up areas*</b>		
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"> <li>• Are not adjacent to or near to a large built-up area; or</li> <li>• Are adjacent to or near to a large built-up area, but containing or being largely enclosed by significant existing development.</li> </ul>	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.
<b>Purpose B – to prevent neighbouring towns merging into one another**</b>		
Weak or None	Assessment areas that contribute weakly are likely to include those that: <ul style="list-style-type: none"> <li>• Do not form part of a gap between towns, or</li> <li>• Form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation.</li> </ul>	The site sits adjacent to Fen Ditton, which is a village, so the site does not form part of a gap between towns.

Contribution	Illustrative Features	Relevance to Site
<b>Purpose D – to preserve the setting and special character of historic towns</b>		
Weak or None	<p>Assessment areas that make no or only a weak contribution are likely to include those that:</p> <ul style="list-style-type: none"> <li>• Do not form part of the setting of a historic town; or</li> <li>• Have no visual, physical, or experiential connection to the historic aspects of the town.</li> </ul>	<p>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.</p>

\*"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)

5.4 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.”*

5.5 In landscape and visual terms, 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 provide a strong reason to restrict development.

5.6 On this basis it is concluded that the site comprises grey belt.

#### **Would Development of the Site Fundamentally Undermine the Purposes of The Remaining GB Across the Plan Area**

5.7 Purposes a, b and d are assessed above in relation to the NPPG where it is found that the site contribution to these GB purposes is weak or none.

5.8 EDP's review of the assessment, and its own assessment of the site against NPPF GB purposes, finds that the harm from release of the site land would be less than moderate, it would not undermine the wider green belt function. The site has not been identified in the extensive historic evidence base as forming any elevated importance gap or separation function, unlike land elsewhere under Fen Ditton.

5.9 On this basis of both of these findings, 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.

## **Making an Assessment of Impact on Openness**

5.10 The NPPG states that:

*“Footnote 55 to the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.*

*This is consistent with rulings from the courts on these matters that, where development (of any kind, now including development on grey belt or previously developed land) 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’.” (Paragraph: 014 Reference ID: 64-014-20250225).*

## **6 CONCLUSION**

6.1 Based on the above it is judged that the site is grey belt and it would not fundamentally undermine the purposes of the remaining GB across the plan area if released for development. In this regard, it is appropriate for removal from the GB subject to the wider considerations relevant to the consideration of development proposals on the site including:

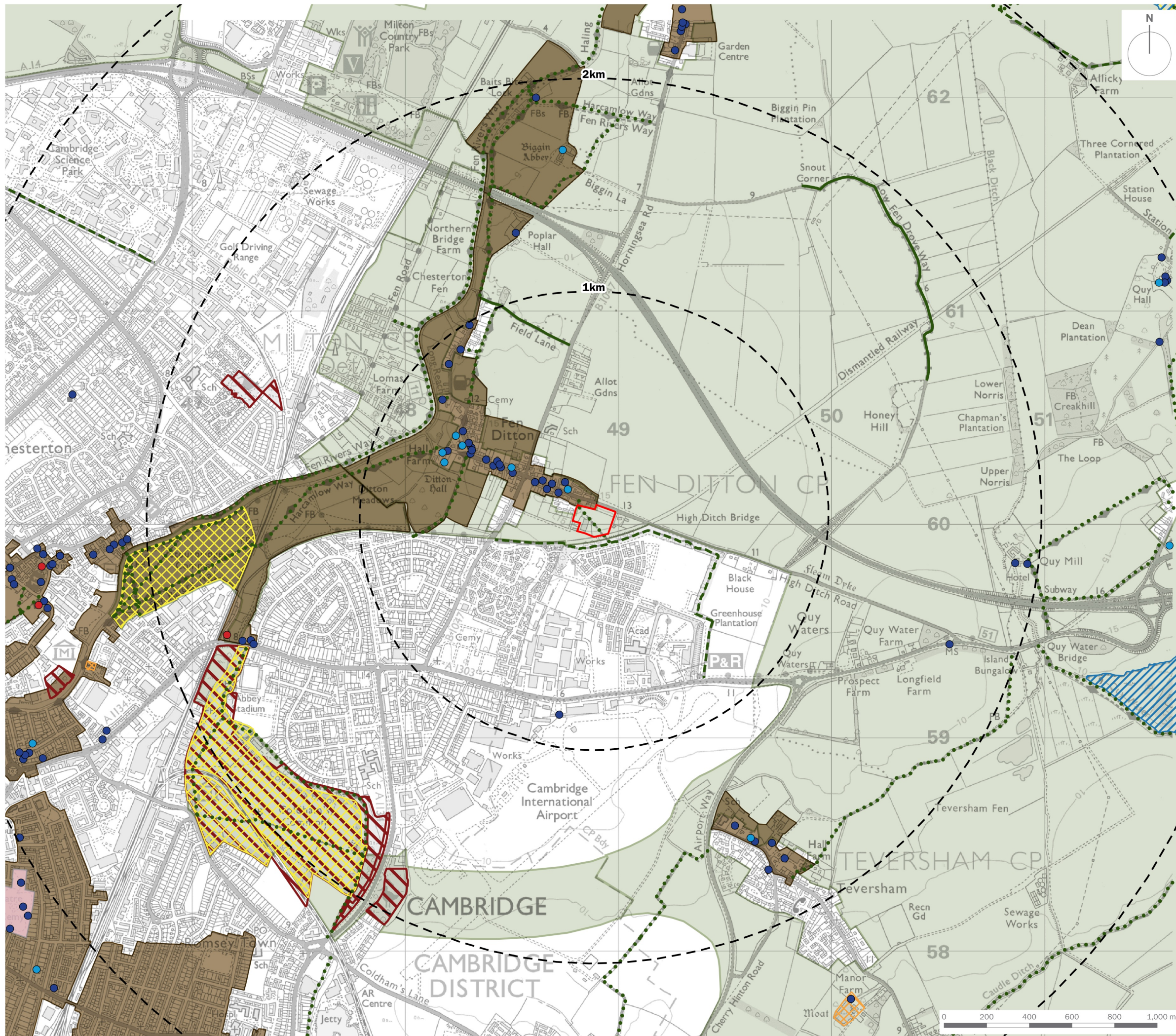
*“Determining whether the development would not be inappropriate development in the green belt, as set out in paragraph 155 of the NPPF (<https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>). That question would include consideration of whether a development is sustainably located, whether it would meet the ‘Golden Rules’ contributions (where applicable), and whether there is a demonstrable unmet need for the type of development proposed.*

*Where a development is not inappropriate in the green belt, this does not itself remove the land from the green belt nor require development proposals to be approved. in accordance with section 38(6) of the planning and compulsory purchase act 2004 (<https://www.legislation.gov.uk/ukpga/2004/5/section/38>), wider policies and considerations apply, including those in the area’s adopted plan, and in the NPPF read as a whole.”*

6.2 Consideration of these matters falls outside the scope of this note.

## Plans

**Plan EDP 1:** Site Location and Relevant Planning Designations and Considerations  
(edp9398\_d001a 08 September 2025 WGa/MMm)



- Site Boundary
- Range Rings (at 1km intervals)
- Heritage**
- Registered Parks and Gardens
- Scheduled Monument
- Conservation Area
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Ecology**
- Site of Special Scientific Interest (SSSI)
- Local Nature Reserve (LNR)
- Landscape**
- Green Belt
- Open Access Land (CRoW Act 2000)
- Footpath
- Bridleway
- Byway

client  
**Copley Estates Limited**

project title  
**Land At Fleam End Farm, High Ditch Road, Fen Ditton**

drawing title  
**Site Location and Relevant Planning Designations and Considerations**

date	<b>08 SEPTEMBER 2025</b>	drawn by	<b>WGa</b>
drawing number	<b>edp9398_d001a</b>	checked	<b>MMm</b>
scale	<b>1:17,500 @ A3</b>	QA	<b>RBa</b>



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