

Silverdale Close, Coton, Cambridgeshire

Green Belt Assessment

Prepared by:

The Environmental Dimension Partnership Ltd

On behalf of:

Martin Grant Homes

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PLANS

Plan EDP 1: Environmental Planning Context and Considerations (edp4413_d004b 08 April 2019 GY/TR)

Section 1 Introduction

- 1.1 The Environmental Dimension Partnership (EDP) Ltd have been appointed by Martin Grant Homes to prepare a Green Belt (GB) Assessment for potential residential development on land south of Silverdale Close, Coton, Cambridgeshire ('the site'). The site location and planning context is shown on **Plan EDP 1**.
- 1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham, and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute¹ specialising in the assessment of the effects of proposed development on the landscape.
- 1.3 The site is located at the south-western edge of Coton and falls within the South Cambridgeshire District Council Local Planning Authority (LPA). The site is situated entirely within the Cambridgeshire Green Belt (GB), which washes over most of the site context, as illustrated by **Plan EDP 1**.
- 1.4 The proposals for the site are illustrated on the Concept Masterplan at **Appendix EDP 1**. The proposed development is for up to 77 residential units with associated Green Belt buffer around proposed public open space. Development is limited to the northern site area, with the southern site area retained as flood water mitigation, open space and additional tree planting to reinforce the permanence of the boundary.
- 1.5 This GB Assessment is a response to South Cambridgeshire District Council's 'Call for Sites' consultation and the opportunity identified to promote the site for the upcoming Greater Cambridge Local Plan.

PURPOSE AND STRUCTURE OF THIS GREEN BELT ASSESSMENT

- 1.6 This purpose of the GB Assessment is to test whether bringing forward sustainable development on this site would allow the key purposes of the GB, in the context of the wider settlement of Cambridge, to be maintained, or possibly even enhanced. The assessment considers the extent to which a continued sense of openness can be maintained within the tract of land around Greater Cambridge.
- 1.7 In undertaking the assessment described here, EDP has:
 - Reviewed the relevant policy context and evidence base supporting the Council's recent releases of land from the GB at Section 2;

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¹ LI Practice Number 1010.

- Undertaken a brief appraisal of landscape character and visual amenity of the site and context as relevant to GB, at Section 3;
- Provided a review of the Council's assessment of the extent to which the site performs against the Cambridgeshire GB purposes at **Section 4**;
- Undertaken a detailed assessment of the extent to which the site performs against the NPPF GB purposes at Section 5, detailed in Appendix EDP 3. This has been undertaken by a Chartered Landscape Architect and follows a bespoke methodology and assessment criteria prepared by EDP (see Appendix EDP 2). References are made to the Concept Masterplan, saved as Appendix EDP 1;
- Undertaken a review of the site contribution to GB in **Section 6**; and
- Provided a summary and conclusions in Section 7.

Section 2 Policy Context and Considerations

NATIONAL POLICY

2.1 The NPPF December 2024, updated 07 February 2025² (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;"
 - 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".

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² https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [accessed 19.02.25].

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

- 2.5 National Planning Practice Guidance (NPPG) Green Belt (published July 2019, last updated 27 February 2025)³ sets out advice on the role of the GB in the planning system. The NPPG is included at **Appendix EDP 4**.
- 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.

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³ https://www.gov.uk/guidance/green-belt#assessing-green-belt-to-identify-grey-belt-land [accessed 05.03.25]

- 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 Coton, 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 application 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 application site at Coton:
 - "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)⁴; and the more recent
 - Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options) January 2023⁵.
- 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;

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⁴ https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf [accessed 17.10.24].

https://consultations.greatercambridgeplanning.org/sites/gcp/files/2023-01/PDGCLPDSUReg18P0Jan23v1Jan23.pdf [accessed 17.10.24].

- 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 Green Belt. Thereafter, several studies were commissioned to look at 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 Green Belt study which forms a part of the Local Plan evidence base, is the Greater Cambridge Green Belt Assessment Final Report, South Cambridgeshire District Council and Cambridge City Council (LUC, August 2021) (LUC, August 2021) (GCGBA). This document is reviewed in **Section 4**.
- 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)⁶;
 - The Cambridge Sub-Region Study (Colin Buchanan and Partners, September 2001)⁷;
 - Inner Green Belt Study (CCC, 2002)8;
 - Cambridge Green Belt Study: A Vision for the Future of Cambridge and its Green Belt Setting, Final Report (LDA, 2002)9;
 - 2012 Appraisal of the Inner Green Belt, May 2012¹⁰;
 - 2012 Inner Green Belt Boundary Study, December 201211; and

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⁶ https://www.scambs.gov.uk/media/19120/cd512-greater-cambridge-green-belt-assessment-excerpts.pdf [accessed 13.10.24].

⁷ https://www.cambridge.gov.uk/media/2551/rd-strat-010.pdf [accessed 13.10.24].

⁸ https://files.cambridge.gov.uk/public/ldf/coredocs/Inner%20Green%20Belt%20Boundary%20Study%202002 %20pdf%20version%2024.4.05.pdf [accessed 13.10.24].

⁹ https://www.scambs.gov.uk/media/7579/cambridge-green-belt-study.pdf [accessed 13.10.24].

¹⁰ https://www.cambridge.gov.uk/media/2518/inner-green-belt-appraisal-2012.pdf [accessed 13.10.24].

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

Cambridge Inner Green Belt Boundary Study (LDA Design, 2015)¹².

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."¹³

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).

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

¹³ Greater Cambridge Green Belt Assessment Final Report, South Cambridgeshire District Council and Cambridge City Council (LUC, August 2021). Paras 2.51-2.52.

2.25 With its focus on the eastern sector of the Cambridge GB, the study excludes the area of the site and so is of limited relevance here. However, of broader relevance, it does identify a number of "qualities that contribute positively to the setting and special character of Cambridge, and which are essential to the Green Belt purposes".

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. These broad zones exclude the site and so the appraisal is of limited direct relevance.

2012 Inner Green Belt Boundary Study, December 2012

- 2.29 The Inner Green Belt Boundary Study (2012) draws on and reviews the 2002 study, from which it identified land on the edge of Cambridge, where it was considered that exceptional circumstances justified their release from the Green Belt. However, the study area focused on the land between Cambridge and the M11 to the west, the A14 and east Cambridge and did not include Coton or the site, which lies approximately 1.33km further to the west of the M11.
- 2.30 However, 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...".
- 2.31 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

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

- A review of the methodologies put forward by objectors in relation to the Inner GB Boundary.
- 2.33 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).
- 2.34 As with the 2012 report, the study area boundary was confined to land on the edge of Cambridge and excludes Coton, so that it is of limited relevance here. However, Coton and the site fall within the 'Connective townscape landscape', as illustrated at **Image EDP 2.1** below.

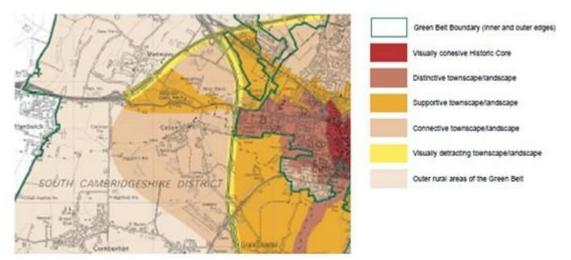


Image EDP 2.1: Cambridge Inner Green Belt Boundary Studay, 2015. Figure 11: Townscape and Landscape Role and Function. Extract.

2.35 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).

COTON CONSERVATION AREA

- 2.36 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 Purpose 2 "to maintain and enhance the quality of its setting".
- 2.37 Coton Conservation Areas (CA) is entirely separated from the site by intervening 20th century residential built form. There is no intervisibility between the site and the CA.

Section 3 Landscape Character, Visual Amenity and the Proposed Development

LANDSCAPE CHARACTER AND VISUAL AMENITY

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)¹⁴ which forms a part of the Local Plan evidence base.
- 3.3 The site falls within Landscape Character Area (LCA) 3: Western Claylands, a part of Landscape Type (LT) 3: Lowland Farmlands.

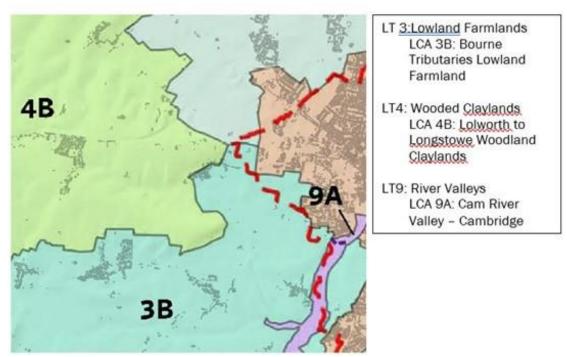


Image EDP 3.1: Greater Cambridge Landscape Character Assessment. Figure 4.1. Extract.

3.4 LCA 3B: Bourn Tributaries Lowland Farmlands is "a well settled rural landscape, with distinctive radio telescopes on the skyline that is strongly influenced by the wide, shallow valley of the Bourn Brook."

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

- 3.5 The Key Characteristics of this LCA are:
 - "Wide valley of the River Bourn and its tributaries as it nears its confluence with the River Cam;
 - Generally strong, regular rectilinear field pattern with smaller scale pastoral fields near villages;
 - Ecological richness associated with the river including lowland meadows, good quality semi improved grassland and floodplain grazing marsh;
 - Radio telescopes are a unique and distinctive feature on the skyline;
 - Well defined settlement edges defined by mature trees, copses and thick hedgerows enclosing small scale fields and paddocks;
 - Network of major roads locally detracts from the otherwise tranquil, rural character;
 - Recreational land use includes golf clubs, University sports fields and a polo club;
 - Coton Countryside Reserve is linked to the historic core of Cambridge by views towards the city's historic core and a green corridor which contributes to the setting of the city."
- 3.6 EDPs field assessment found that, at the broader scale, the landscape south-west of Coton is consistent with GCLCA landscape description, with the site comprising one of the "smaller enclosed fields and paddocks are often found around village edges". However, the published description covers a large area and, understandably, does not consider the local influences at the site level.
- 3.7 Historic mapping shows that the site comprises the remains of a former field parcel, the northern area of which was developed from the mid- to late-20th century. The field to the east of the site was developed slightly earlier around the mid-20th century. The historic field scale and pattern has, therefore, been disrupted and the properties apparent from the site are relatively recent and do little to reflect the historic settlement core or contribute to the sense of place.
- 3.8 Field assessment found that intervisibility with this settlement edge urbanises the site. Further, the site is visually and physically isolated from the wider rural landscape by the woodland, at its western boundary, and the well-treed brook corridor to the south. Consequentially the site relates most strongly to the settlement edge and has a settlement edge character.

Visual Amenity

3.9 EDP's field assessment found that that visibility to the site is substantially limited by vegetation and settlement at and beyond the site boundary, so that the effect of residential development of the site is likely to be limited to property and roads at the immediate settlement edge.

3.10 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.

PROPOSED DEVELOPMENT

- 3.11 A Concept Masterplan for the proposed development is included in **Appendix EDP 1**.
- 3.12 The above landscape and visual appraisal informed and reviewed the emerging proposals to ensure the integration of mitigation measures that align with the specific landscape guidelines of LCA 3B Bourn Tributaries Lowland Farmlands, including conservation and enhancement to existing landscape features; creation of links between villages and recreational assets; and is in keeping with the rural character
- 3.13 Consequentially the proposals retain, protect, and enhance existing mature vegetation at the site boundaries. In addition, a landscape buffer is included along the southern boundary, to create a 'soft' transition between the village, the brook, and the countryside beyond. This comprises naturalistic landscaping and tree planting, which is sympathetic and characteristic and would ensure that the site is integrated with the wider landscape.
- 3.14 Further, the residential development of the site in accordance with the Concept Masterplan offers the opportunity to enhance the setting of the brook so that it can be better appreciated and shows how the site can provide new areas of natural green space.
- 3.15 The location and nature of the site means that residential development proposals, in accordance with the Concept Masterplan, present an opportunity to set proposed development within a suitable landscape framework. This will ensure that the site remains connected with the south-western edge of Coton and integrated with the wider agricultural landscape to the west and south.

Section 4 Greater Cambridge Green Belt Assessment

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 NPPF 2024 purposes set out in **Table EDP 4.1**:
 - 1. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre:
 - 2. Maintain and enhance the quality of its setting; and
 - 3. Prevent communities in the environs of Cambridge from merging into one another and with the city.

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

Cambridge Purpose	NPPF Purpose	Comment
1. Preserve the unique character of Cambridge as a compact, dynamic city, with thriving historic centre.	1. To check the unrestricted sprawl of large built-up areas.	Cambridge Purpose 1 deals with the compact nature of the city, and as such is directly related to the issue of urban sprawl, meaning that this purpose is directly related to the essence of NPPF Purpose 1.
2. Maintain and enhance the quality of its setting.	3. To assist in the safeguarding of the countryside from encroachment. 4. To preserve the setting and special character of historic towns.	Cambridge Purpose 2 is clearly related to NPPF Purpose 4, as noted above, but is also closely related to NPPF Purpose 3, owing to the strong rural character of Cambridge's setting. Whilst both NPPF Purpose 4 and 3 will be covered under Cambridge Purpose 2, NPPF Purpose 4 is given relatively more weight.

Cambridge Purpose	NPPF Purpose	Comment
		This allows more meaningful variations in contribution and harm to be drawn out in the specific context of Cambridge.
4. Prevent communities in the environs of Cambridge from merging into one another and with the city.	2. To prevent neighbouring towns merging into one another.	Cambridge Purpose 3 is closely related to NPPF Purpose 2. However, the focus here is not on 'gaps' between towns specifically, but on the gaps between Cambridge and the surrounding necklace of villages and on the gaps between individual villages themselves – both 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 CT12 as illustrated at **Image EDP 4.1**. The site comprises approximately less than a third of the parcel, with the main site area comprising the south-eastern extent of the parcel which abuts the settlement edge to the north and east and is enclosed by woodland and well-treed vegetation along the brook to the west and south respectively.

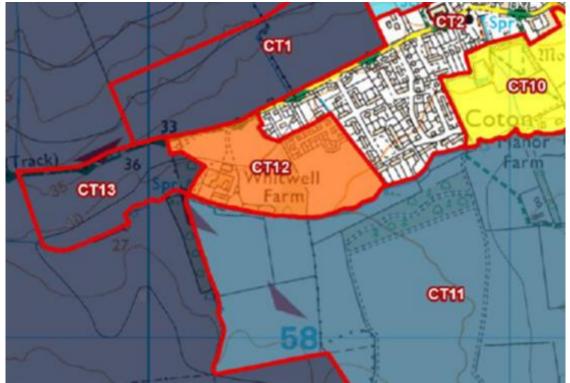


Image EDP 4.1: Parcel CT12 (GCGBA Appendix B Parcel CT12 extract).

- 4.5 Each parcel was then assessed in terms of:
 - Parcel location and openness;
 - Distinction between parcel and inset area;
 - Contribution to the GB purposes;
 - Impact on contribution of adjacent GB; and
 - Overall harm of GB release.
- 4.6 The assessment of Parcel CT12 is included at **Appendix EDP 2**, with the results of the assessment in relation to contribution to Cambridgeshire GB purposes and overall harm of GB release are summarised in **Table EDP 4.2** and **Image EDP 4.2**.

 Table EDP 4.2: Green Belt Parcel CT12 Contribution to Harm Ratings (Extract of GCGBA Table 4.1)

			Cambridge (Green Belt Pu	ırposes		
Settlement	Parcel Ref.	Release Scenario	Area (ha)	P1 Contribution	P2 Contribution	P3 Contribution	Harm
Coton	CT12	Release of land as an expansion of Coton	11.49	Limited/No Contribution	Moderate	Relatively Limited	Moderate

- 4.7 Further findings of the assessment are summarised below:
 - Parcel location and openness: "The land is open";
 - Distinction between parcel and inset area: "Overall, there is moderate distinction between the parcel and the inset area."; and
 - Impact on contribution of adjacent Green Belt: "Release of land as an expansion of Coton: Rating: Minor".

REVIEW OF THE ASSESSMENT FINDINGS IN RELATION TO THE SITE

4.8 The fact that the site (3.46ha) forms approximately a third of the assessment parcel (11.29ha), sits adjacent to the settlement edge on two sides, and is visually enclosed from the wider rural landscape, means that its contribution to Cambridgeshire GB purposes and overall harm is less than the parcel as a whole, as discussed below.

4.9 In relation to CT12 assessment considerations of Cambridgeshire GB purposes:

Cambridge Purpose 1 - to Preserve the Unique Character of Cambridge as a Compact, Dynamic City with a Thriving Historic Centre. Contribution: Limited/No Contribution

4.10 EDP's finings concur with those of the report that the parcel, and the site, "makes no contribution to Cambridge Purpose 1".

Cambridge Purpose 2 - to Maintain and Enhance the Quality of Cambridge's Setting. Contribution: Moderate

4.11 CT12 assessment finds that the parcel contributes in this regard, due mainly to the fact that:

"When viewed from the elevated clay ridge to the north, northwest and west (including from Madingley Road and Long Road) it allows an appreciation of the scale, separate identity (from Cambridge) and rural setting of Coton, as well as the wider rural setting of Cambridge."

4.12 However, the site is visually enclosed so that it is not apparent from the wider landscape and its primary visual connections are limited to the settlement edge. For these reasons, it is considered to make a less than moderate contribution to purpose 2 than the parcel as a whole.

Cambridge Purpose 3 - to Prevent Communities in the Environs of Cambridge from Merging into One Another and With the City: Contribution: Relatively Limited

- 4.13 The site, being smaller than the parcel, will have less of an impact on the distance between settlements. Further, well-treed vegetation to the west and south provides a notable separating feature in addition to the elevated land noted in the assessment.
- 4.14 Further, the site has a stronger relationship with the inset area than the wider parcel, and less of a distinction from it, due primarily to proximity and intervisibility, so that it makes a very limited contribution to the prevention of communities merging into one another, at most.
- 4.15 In relation to the other CT12 assessment considerations:

Parcel Location and Openness

4.16 In contrast with the wider parcel, where the assessment finds "Land is open. There is no development of a scale, character or form that has a significant impact on Green Belt openness". The site abuts, and has notable intervisibility with, the settlement edge along the entirety of its northern and eastern boundaries while intervisibility with the wider rural landscape to the west and south is substantially restricted by woodland, to the west, and well-treed vegetation, along the brook to the south. The site is therefore visually enclosed and urbanised to some degree.

Distinction Between Parcel and Inset Area

4.17 EDP's field assessment findings aligned with those of the report finding that:

"The garden boundaries at the inset edge of Coton ... provide little boundary separation between the parcel and the settlement. Furthermore, residential development has breached into the eastern part of the parcel. As a result, there is some urbanising visual influence within the parcel."

4.18 However, in contrast to with the wider parcel, EDP found that there are no views from the site "of open countryside to the north, west and south". Consequentially, the character of the site is somewhat more urbanised than that of the wider parcel and the distinction between it and the inset area is less than for the parcel as a whole.

Impact on Contribution of Adjacent Green Belt

- 4.19 EDP finds that the impact of the release of land as an expansion of Coton on the contribution of adjacent GB would be less than minor, due primarily to the inset nature, small size, and visual enclosure of the site land.
- 4.20 In contrast to the parcel, the site makes a less than moderate contribution to maintaining and enhancing the quality of Cambridge's setting, and a very limited contribution to preventing communities in the environs of Cambridge from merging with each other. The additional impact on the adjacent GB of the release of the site would be less than minor. Therefore, the harm resulting from its release, as an expansion of Coton, would be minor.

Section 5 EDP Assessment of Site Contribution to NPPF Green Belt Purposes

ASSESSMENT OF SITE CONTRIBUTION TO GB PURPOSES 1 TO 4 USING EDP METHODOLOGY

- 5.1 EDP has undertaken an assessment of the extent to which the site performs against the NPPF GB purposes. This has been undertaken by a Chartered Landscape Architect and follows the bespoke methodology set out at **Appendix EDP 2**.
- 5.2 The detailed assessment is set out at **Appendix EDP 3** with a summary of the findings set out in **Table EDP 5.1** below.

 Table EDP 5.1:
 Summary of EDP Site-specific Green Belt Assessment

Green Belt Purpose (NPPF)	EDP Methodology Criteria	Site	
		Contribution	
Purpose 1 To check the unrestricted sprawl of large built-up areas.	What contribution does the site make to providing a contiguous open area between the settlement edge and the wider Green Belt?	Low	
	What contribution do the site boundaries make to maintaining openness with the wider Green Belt?	None	
Purpose 2 To prevent neighbouring	To what extent is the site associated with the existing settlement edge(s)?	Low	
towns merging into one another.	Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?	Low	
Purpose 3 To assist in safeguarding the countryside from	What contribution does the site make to representation of the key characteristics of the countryside?	Low	
encroachment.	To what extent is the site urbanised, either by on-site or off-site features?	Low	
Purpose 4 To preserve the setting and special character of historic	Does the site represent the special characteristics of the setting to the historic town?	No	
towns.	Is there intervisibility between the site and historic landmarks?	No	
Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not tested.	N/A	
Overall Weighting		Low	

5.3 EDP's assessment of the site, in relation to the main GB purposes, finds that the site provides a **low contribution** to the GB purposes.

REVIEW OF THE FINDINGS OF EDP'S ASSESSMENT IN RELATION TO THE SITE

5.4 The following paragraphs summarise the detailed findings of the EDP tests and considers these in light of the potential to remove the site from the Green Belt and redevelop it, whilst ensuring the fundamental purpose of the adjoining Green Belt can be maintained.

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

- 5.5 The main finding in respect of this assessment is that the existing mature woodland to the site's western and southern boundaries prevent the site from allowing unrestricted sprawl to develop. There is no development within the site that has resulted through unrestricted growth.
- 5.6 Furthermore, redevelopment of the site is expected to come forward as part of a planned approach, dealt with formally through the planning process and not in a piecemeal fashion of an unrestricted nature.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

5.7 The geographic distances between Coton and the next nearest villages at Barton and Comberton, as well as Cambridge to the east, are so great that the potential for merging, as a result of removal of the site and redevelopment of it, is unlikely in the current plan period. Additionally, the effects of distance and intervening vegetation along the boundaries of the site and in the intervening landscape, ensure there is no perception of a reduction in the openness of the GB from these surrounding settlements, were the site to be removed and re-developed.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 5.8 The site makes only a limited contribution to the key characteristics of the landscape of the Western Claylands, principally as a small part of the wider agricultural landscape. However, the mature woodland along the southern and western boundaries considerably reduces the perceptual relationship of the character of the site with the wider Western Claylands. This level of containment also ensures that the site makes only a very limited contribution to the setting of the village, which is not readily appreciated due to the absence of Public Rights of Way (PRoW) passing through the site.
- 5.9 In that regard, the site makes only a low contribution to the countryside of the GB, defined as the Western Claylands.

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

5.10 The site is screened from the CA and Cambridge by intervening 20th century built form in Coton and there is no intervisibility between the CA or Cambridge where a full appreciation of their landscape setting can be appreciated. The site therefore makes no appreciable contribution to the historic setting to either the CA or Cambridge.

Section 5 24 March 2025

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

5.11 The most recent GB studies commissioned by the relevant Councils have determined that this purpose cannot be tested in the context of demonstrating potential removal of land from the designation. This test therefore does not form part of the GB Assessment.

Section 6 Site Contribution to Green Belt

- 6.1 This section reviews the findings, of the GCGBA and EDP's assessment of the site against the Cambridge and the NPPF 2024GB purposes, to determine whether the application of the Framework is likely to find development of the site 'not inappropriate'.
- 6.2 It then uses the new NPPG criteria to assess the GB and reach a judgement as to whether proposals utilise grey belt land and whether development of the site would fundamentally undermine the purposes of the remaining GB across the plan area.

SUMMARY OF CAMBRIDGE AND EDP ASSESSMENT AGAINST NPPF 2024 PURPOSES

- 6.3 NPPF paragraph 155 states, in relation to grey belt, that GB should not be regarded as inappropriate where:
 - a. "The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan."
- 6.4 The NPPF 2024 Annex 2 defines grey belt as:

"Land in the Green Belt comprising previously developed land and/or <u>any other land that,</u> in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143."

- 6.5 The GCGBA finds that the harm to GB resulting from release of its parcel CT12, as an expansion of Coton, would be moderate. EDP's review of the assessment finds that the harm from release of the site land would be less. 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.
- 6.6 Further, the GCGBA and EDP find a limited contribution to the Cambridge GB purposes and the NPPF 2024 GB purposes, as summarised below. On this basis it is concluded that the site comprises grey belt.

Table EDP 6.1: Summary of EDP Appraisal of GCGBA Findings in Relation to Overall Harm of Green Belt Release of Parcel CT12 and the Site

GCGBA Assessment in relation to Cambridge GB Purposes	NPPF Purpose	GCGBA Findings (Appendix B Parcel HI8)	EDP's Findings re: the Site in comparison to Parcel CT12
Purpose 1 - to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.	Purpose 1. To check the unrestricted sprawl of large built-up areas.	Limited/No contribution	No contribution

GCGBA Assessment in relation to Cambridge GB Purposes	NPPF Purpose	GCGBA Findings (Appendix B Parcel HI8)	EDP's Findings re: the Site in comparison to Parcel CT12
Purpose 2 - to maintain and enhance the quality of Cambridge's setting.	Purpose 3. To assist in the safeguarding of the countryside from encroachment.	Moderate contribution	Less than Moderate
	Purpose 4. To preserve the setting and special character of historic towns.		
Purpose 3 - to prevent communities in the environs of Cambridge from merging into one another and with the city.	Purpose 2. To prevent neighbouring towns merging into one another.	Relatively Limited contribution	Very Limited

Table EDP 6.2: Summary of EDP Assessment of the Site Against the NPPF GB Purposes 1 to 4

NPPF Purpose	Findings of EDP's Assessment
Purpose 1 : To check the unrestricted sprawl of large built-up areas	Very low contribution
Purpose 2: To prevent neighbouring towns merging into one another	Low contribution
Purpose 3: To assist in safeguarding the countryside from encroachment	Low contribution
Purpose 4: To preserve the setting and special character of historic towns	No contribution

ASSESSMENT AGAINST NPPG CRITERIA

6.7 The 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

- 6.8 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, as set out in **Appendix EDP 4**.
- 6.9 **Table EDP 6.3** below sets out an assessment of the site against these considerations.

Table EDP 6.3: Assessment of Site Against Green Belt Purposes A, B and D Using PPG Considerations

Contribution	Illustrative Features	Relevance to Site
Purpose A – to c	heck the unrestricted sprawl of large built up a	reas*
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: • 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 Coton which is a village, so the site is not adjacent to or near to a large built-up area.
Purpose B – to p	revent neighbouring towns merging into one a	nother**
Weak or None	Assessment areas that contribute weakly are likely to include those that: • 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 Coton which is a village, so the site does not form part of a gap between towns.

Contribution	Illustrative Features	Relevance to Site	
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: • 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 separated from the historic core of Coton by recent residential development and is considered to have no visual, physical, or experiential connection to the historic aspects of the town.	

^{*&}quot;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)

6.10 In relation to grey belt the PPG continues:

"After consideration of the above criteria, <u>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</u>, 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."

- 6.11 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.
- 6.12 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

- 6.13 Purposes a, b and d are assessed above in relation to NPPG where it is found that the site contribution to these GB purposes is weak or none.
- 6.14 As set out above, the GCGBA finds that the harm to GB resulting from release of its parcel CT12, as an expansion of Coton, would be moderate. 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.
- 6.15 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.

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

Making an Assessment of Impact on Openness

6.16 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)

Conclusion

6.17 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 **NPPF** in the green belt. as set out in paragraph 155 of the (https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-greenbelt-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."

6.18 Consideration of these matters falls outside the scope of this report.

Section 7 Summary and Conclusion

- 7.1 EDP has been commissioned by Martin Grant Homes to undertake a GB Assessment to examine the contribution of the site to the Cambridge GB and whether it is appropriate for development. Part of this approach has been to review the Cambridge and joint Cambridge/South Cambridge Council evidence base Greater Cambridge Green Belt Assessment Final Report, South Cambridgeshire District Council and Cambridge City Council (LUC, August 2021) (LUC, August 2021) (GCGBA). EDP has also undertaken an assessment of the site against the NPPF GB purposes. An assessment of the site has then been undertaken against the approach set out in the NPPG published 22 July 2019 and last updated 27 February 2025.
- 7.2 EDP has reviewed the GCGBA to determine the contribution that the site makes to the Cambridge GB purposes (which are representative of the NPPF purposes locally) and its contribution to adjacent GB, and overall harm of GB release of the site. The findings are summarised in **Table EDP 6.1**. EDP has also undertaken an assessment of the performance of the site against the GB purposes using its own methodology. The findings are summarised in **Table EDP 6.2**.
- 7.3 When the findings of EDP review and assessment are tested against the NPPF 2024, and separately using the approach and criteria set out in the NPPG, EDP find that the site comprises grey belt land and residential development of the site would not be inappropriate in terms of GB release.
- 7.4 The EDP review and assessment also found that release of the site would not fundamentally undermine the purposes (taken together) of the remaining GB across the plan area as whole, it would not affect the ability of all the remaining GB across the area of the plan from serving all five of the GB purposes in a meaningful way.
- 7.5 Removal of the site from the GB can be undertaken immediately, without the reliance on establishment of new defensible boundaries. This is reflected in the Concept Masterplan (**Appendix EDP 1**) for redevelopment of the site, which includes clear opportunities to provide an on-site commitment to retain and reinforce the defensible boundaries. Further, the site provides the opportunity to create good quality green and blue space that is accessible to the public as illustrated on the Concept Masterplan at **Appendix EDP 1**.
- 7.6 In combination with the low contribution to the NPPF purposes, removal of the site from the Cambridge GB will preserve the special qualities of the setting to Cambridge and:
 - "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."

7.7 This assessment has concluded that the site is grey belt and could reasonably be removed from the GB and it can be developed in accordance with the principles of the Concept Masterplan (as detailed in **Appendix EDP 1**) without harm to the openness, permanence, or purposes of the GB overall. Additionally, redevelopment of the site would provide potential benefits in terms of creation of an attractive, integrated settlement edge, a defensible GB boundary over the current plan period, and maintain the identity of Coton as being entirely surrounded by GB.

Appendix EDP 1
Concept Masterplan
(edp4413_d007a 08 April 2019 RA/PW)



Application Boundary	3.46 ha
Net Developable Area @ 30dph equates to 70 dwellings	2.36 ha
Open Spaces and Planting	1.10 ha

Martin Grant Homes

project title

Silverdale Close, Coton, Cambridgeshire

drawing title

Concept Masterplan

drawing number edp4413_d007a checked PW

1:2000 @ A3

08 APRIL 2019 drawn by RA QA

the environmental dimension partnership

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Appendix EDP 2 Green Belt Assessment Methodology and Criteria

REVIEW CRITERIA

A2.1 As noted in the NPPF, paragraph 133, the Green Belt serves five purposes. For each NPPF purpose, criteria have been developed that allow for a comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criterion for each purpose is described in more detail and tabulated below.

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

- A2.2 This is a test that considers whether the site is able to prohibit sprawl. Commonly, sprawl is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may already have been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness, this being whether or not there is a sense that the site within the Green Belt is still open and absent of development.
- A2.3 Sprawl may also be discouraged by defensible boundaries to existing settlements that are either natural (e.g. topography, woodland or watercourse) or man-made features (e.g. as a main road, main railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries may contribute towards greater openness.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- A2.4 The consideration here is whether or not the settlement growth could lead to merging with another town. The wording of the NPPF refers to 'towns', but often the Green Belt affects settlements of a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges to distinct settlement areas that might be defined as towns.
- A2.5 In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in terms of geographic scale in either plan view or 'on the ground' by intervening natural or man-made features.
- A2.6 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements the range can be much smaller, with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on distance between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- A2.7 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space and access to it, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks, properties, mineral extraction or larger areas of settlement.
- A2.8 This assessment is informed by the identification of key landscape characteristics of the site and its surroundings, derived from a review of the published Landscape Character Assessment and consideration against aerial mapping of the site, its surroundings and a site-based baseline review, undertaken to inform the design of the concept masterplan. Consideration is also given to the extent of recreational access provided to the Green Belt through the site.
- A2.9 Sites that are highly representative of the key landscape characteristics, and exhibit these in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the Landscape Character Area or contains features that are in poorer condition. This allows a relative and qualitative consideration to be applied to landscapes.
- A2.10 The matter of 'encroachment' is also a judgement that considers whether or not development (such as built form along the edge or within it, pylons and high voltage overhead cables, sub-stations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or divorced them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A2.11 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, encroachment is prevented from progressing by large, man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- A2.12 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded where possible or integrated sensitively into design proposals.

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

A2.13 The setting and special character of an historic town is usually depicted by the presence of one or more conservation areas to denote an historic association with the built form.

- Consideration is also given to potential views towards historic landmarks such as churches, listed buildings or scheduled monuments.
- A2.14 This does not, however, constitute an appraisal of the historic setting of a designated or non-designated historic asset, the nature of which would be determined by a suitably experienced historic consultant and falls outside of the remit of this Green Belt Assessment.

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

A2.15 This purpose falls outside the scope of this report and has not been tested.

REVIEW SCORING

- A2.16 EDP has developed a methodology for Green Belt Reviews, which is based on Landscape and Visual Assessment methodology, with regard to the purposes of the Green Belt and our experience of Green Belt reviews.
- A2.17 The site is scored against the criteria for each purpose as shown in **Table EDP A2.1**, with criteria weighted as **no**, **low**, **moderate** or **strong** contribution towards meeting the purposes of the Green Belt. Occasionally, scores are spread if part of the site makes differing contributions. This ensures that, whilst the NPPF does not require all five purposes, or tests to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from, or retained within, the Green Belt.

Table EDP A2.1: NPPF Paragraph 133 Green Belt Purpose

NPPF paragraph 133	Criteria	Application of Criteria to Site and Criteria Weighting:
Green Belt Purpose		(No Contribution; Low; Moderate; Strong)
Purpose 1 To Check the Unrestricted Sprawl of Large Built-up Areas	 Creates a clear, recognisable distinction between urban fringe and open countryside; and Settlement scale will differ and 'large' may be relative to: hamlet, village, town, city. Typically, a settlement that is the size of a town or city would be considered as a large built-up area. 	 a. Yes, the site is absent of development and associated influences and strongly contributes to the openness of the Green Belt (Strong); b. There is an absence of development within the site, but it is overlooked by adjacent/nearby development (Moderate); c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (Low); and
		d. Land use of the site results in it forming neither countryside nor urban (No contribution).
	Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary;	 a. The site does not have defensible boundaries and maintains openness with the wider Green Belt (Strong); b. The site has some defensible boundary/boundaries and maintains openness in some directions. Additional
	 Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows, tree belts, streams. Fences do not form defensible boundaries; and Incomplete or low boundaries may result in part/all of a site making a greater contribution to the openness of 	reinforcement needed (Moderate); c. The site has some permanent boundaries such as roads/railways/rivers/high ground and partially defensible boundaries, some of which do not require additional reinforcement (Low); and d. The site has permanent defensible boundaries that
	the Green Belt.	would immediately prevent sprawl (No contribution).

NPPF paragraph 133	Criteria	Application of Criteria to Site and Criteria Weighting:
Green Belt Purpose		(No Contribution; Low; Moderate; Strong)
Purpose 2 To Prevent Neighbouring Towns Merging into One Another	 Settlements maintain a recognisable edge; and The extent to which the site forms a logical fit with the settlement, or is perceived as an extension that could erode openness. 	 a. The site forms the gap between two settlement edges (Strong); b. The site abuts two settlement boundaries and therefore forms part of an indent (Moderate); c. The site abuts one settlement boundary but is not divorced from it (Low); and d. The site is clearly separated from the settlement boundary and would not undermine the sense of openness (No Contribution).
	 Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography. A larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap; and The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging. 	 a. Immediate and clear intervisibility with next nearest settlement edge (Strong); b. Partial intervisibility with next nearest settlement edges (Moderate); c. Limited intervisibility with next nearest settlement edges (Low); and d. No intervisibility with next nearest settlement edges (No Contribution).

NPPF paragraph 133	Criteria	Application of Criteria to Site and Criteria Weighting:	
Green Belt Purpose		(No Contribution; Low; Moderate; Strong)	
Purpose 3 To Assist in Safeguarding the Countryside from Encroachment	The countryside comprises 'key characteristics', which define the landscape and the way it is perceived in visual terms or through physical patterns; and	a. The site is highly representative of host Landscape Character Area/Type; does not contain landscape detractors (Strong);	
Country-side from Elicioacimient	Key characteristics may be derived from a review of published Landscape Character Assessments and EDP's own review of landscape character.	 The site is partially representative of host Landscape Character Area/Type; there are some landscape detractors (Moderate); 	
		c. The site has a low representation of characteristics; many landscape detractors (Low); and	
		d. No representation of Landscape Character Area/Type; high number of detractors that weaken landscape character considerably (No Contribution).	
	Encroachment: features such as settlement edge, speed signage and street lighting affect the extent to	There are no urbanising features within the site or directly influencing it (Strong);	
	which the countryside is perceived to change from rural to urban.	 There are several off-site urbanising features affecting the site (Moderate); 	
		c. There are many off-site urbanising features affecting the site (Low); and	
		d. The site is distinct due to its urbanising features (No Contribution).	

NPPF paragraph 133	Criteria	Application of Criteria to Site and Criteria Weighting:	
Green Belt Purpose		(No Contribution; Low; Moderate; Strong)	
Purpose 4 To Preserve the Setting and Special Character of Historic Towns	 The representation of the special characteristics that contribute to the setting of an historic town, as defined by one or more conservation areas; and The representation of the special characteristics that contribute to the setting of an historic town, if these are set out in the Council's supporting evidence base, where different from those defined for conservation areas. 	 a. The site is highly representative of the special characteristics associated with the setting to an historic town (Strong); b. The is partially representative of special characteristics associated with the setting to an historic town (Moderate); c. The site has some representation of special characteristics associated with the setting to an historic town (Low); and d. The site has no representation of the special characteristics associated with the setting to an historic town (No Contribution). 	
Purpose 5 To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land.	Not tested.	Not tested.	

Appendix EDP 3 EDP Green Belt Assessment against the NPPF Green Belt Purposes

Description of the Site

The site lies at the south-western edge of the village of Coton, with existing residential development characterised by predominantly 20th century development immediately to the north, off Pendrick Close and east, off Silverdale Avenue. The development spans the full length of these boundaries.

To the south, the site boundary is formed by Bin Brook and mature woodland aligning this watercourse.

To the west, mature woodland in a roughly triangular shape lies off-site, spanning the full length of the boundary. The woodland measures approximately 90m wide in the southern and central portions, narrowing to approximately 20m in the northern portion where it meets with the existing settlement edge. The context of the site is illustrated by **Figure EDP A3.1**.

Figure EDP A3.1: Site and immediate context.



Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas		
Application of Criteria	Assessment	Score
Does the site form a contiguous open area between the existing settlement edge and the wider countryside and/or large built-up area?	The site is currently undeveloped and physically and visually separated from a much larger contiguous open area extending to the west and south. There are no roads extending through the site, and therefore no unrestricted ribbon development has extended into the wider countryside.	Low Contribution
Application of Criteria	Assessment	Score
Does the site have a defensible boundary, which can prevent sprawl?	The mature boundary to the south is effective in forming an immediate permanent defensible boundary, more so as a result of the Bin Brook. To account for the potential (but unlikely) removal of the mature woodland further south, the Concept Masterplan for redevelopment of the site indicates a large area of additional tree planting and Sustainable Drainage System (SuDS) basin to reinforce these boundaries.	No Contribution

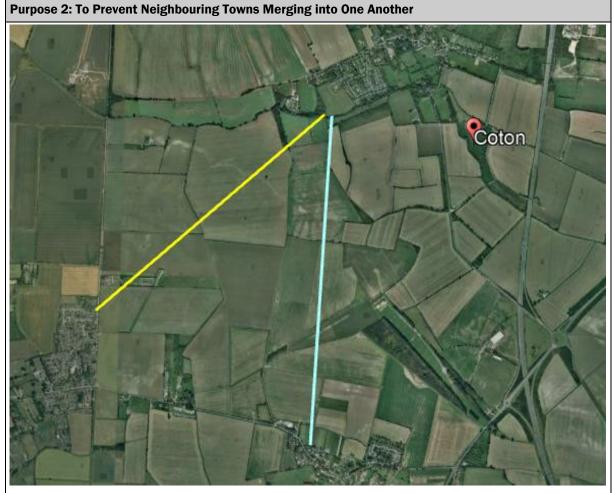


Figure EDP A3.2: Aerial photograph showing the site in relation to Barton to the south (c.2.3km) and Comberton (c.2.15km) to the south-west.

Application of Criteria	Assessment	Score
To what extent is the site associated with the existing settlement edge(s)?	Figure A3.2 illustrates that the site forms an indent to the existing edge of Coton and therefore does not extend substantially further south or west than the existing settlement edge boundaries. In that respect, removal of the site from the Green Belt would only marginally reduce the extant of the designation between Coton and the next nearest settlements to the south, at Barton and south-west, at Comberton, through the removal of a site spanning just c.235m between its south-western and north-eastern extents.	Low Contribution
Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?	Due to the visual enclosure of the site by development and vegetation adjacent to the site boundaries, and across the wider, generally flat landscape to the south, there will be a barely perceptible – if at all – reduction in the Green Belt with the next nearest settlements. The does not represent a parcel of land that is fundamental to preventing coalescence with the next nearest villages.	Low Contribution

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment		
Application of Criteria	Assessment	Score
To what extent does the site represent the key characteristics of the countryside?	At the smaller grain of the site itself there are, inevitably, local characteristics that influence the character itself, and as a result its representation differs from that of the Western Claylands: Northern hedge comprises a narrow belt of semimature native trees and shrubs that is likely to have been planted when adjacent residential development was introduced; The hedge to the east has come under some pressure from the adjacent housing so that its condition is compromised to some degree; Existing development to the north and east does little to reflect the characteristics of the historic village core and, in this respect, contributes little to the 'sense of place'; The existing development detracts from the rural tranquillity and exerts an urbanising influence across the site; Large buildings at High Cross erode the rural tranquillity in the locality; The near site context is consistent with the Design Guide description of 'settlement character' where "small fields and paddocks also contribute to their landscape setting, providing a transition to the surrounding countryside"; and However, the mature woodland along the southern and western boundary which defines the edge of the site, also creates an abrupt change from the interior of the site to this wider character.	Low Contribution
Application of Criteria	Assessment	Score
To what extent is the site urbanised, either by on-site or off-site features?	Two-storey residential development immediately to the north and east exerts a strong urbanising influence on the site. The mature woodland to the west and south assists greatly in containing this urbanising character and would continue to limit urbanisation of the wider Green Belt, if the site were to be removed and developed.	Low Contribution

Purpose 4: To Preserve the Setting and Special Character of Historic Towns		
Application of Criteria	Assessment	Score
Figure EDP A3.3: Conservation Area (edged in pink) is separated from the site to the south-west by more modern development. Coton Conservation Area (CA) is entirely separated from		No Contribution
	the site by much of the intervening 20 th century residential built form.	
	In terms of special characteristics listed in the adopted Local Plan, relating to the setting to Cambridge, there is no intervisibility between the site and Cambridge and therefore no full appreciation of the landscape setting to the city.	
To what extent is there intervisibility between the site and historic landmarks?	There are no public rights of way (PRoW) crossing the site from which views of the church are currently afforded.	No Contribution

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and other Urban Land		
Application of Criteria	Assessment	Score
Is the site within the Green Belt, and therefore not representative of derelict or other urban land?	Not tested.	N/A
Overall Weight		Low Contribution

Appendix EDP 4 National Planning Practice Guidance



Guidance

Green Belt

Advice on the role of the Green Belt in the planning system.

From: Ministry of Housing, Communities and Local Government (/government/organisations/ministry-of-housing-communities-local-government), Ministry of Housing, Communities & Local Government (2018 to 2021) (/government/organisations/ministry-of-housing-communities-and-local-government-2018-2021) and Department for Levelling Up, Housing and Communities (/government/organisations/department-for-levelling-up-housing-and-communities)

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- Considering the impact on the remaining Green Belt in the plan area
- Proposals on grey belt land
- Identifying sustainable locations
- Golden Rules
- Considering the potential impact of development on the openness of the Green Belt

Scope of guidance

This guidance sets out:

- the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land
- the considerations involved in determining whether release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;
- guidance for considering proposals on potential grey belt land
- guidance on identifying sustainable locations when considering the release or development of Green Belt land
- updated guidance on how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, should contribute to accessible green space
- updated guidance on how to consider the potential impact of development on the openness of the Green Belt

Assessing Green Belt to identify grey belt land

This guidance is relevant to those authorities performing a review of Green Belt boundaries to meet housing or other development needs (either prior to or as part of the plan making process), those authorities otherwise required to determine whether land constitutes grey belt in decision making, and others seeking to identify grey belt land.

Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework (NPPF).

Why should authorities assess their Green Belt to identify grey belt land?

As set out in national policy, the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process. In doing so, we expect authorities to identify grey belt land to inform this review and the prioritisation detailed in <u>paragraphs 147 and 148 of the NPPF (https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land).</u>

National policy also requires authorities to identify, where necessary, whether land is grey belt for the purpose of considering applications on Green Belt land. Where land is identified as grey belt land, any proposed development of that land should be considered against <u>paragraph 155 of the NPPF (https://www.gov.uk/guidance/national-planning-policy-framework/13-</u>

<u>protecting-green-belt-land</u>), which sets out the conditions in which development would not be inappropriate on grey belt land.

Paragraph: 001 Reference ID: 64-001-20250225

How should authorities assess their Green Belt to identify grey belt land?

In order to identify grey belt land, authorities should produce a Green Belt assessment, either as part of the review of Green Belt boundaries during the preparation or updating of a local plan, or at another relevant point. This assessment should be informed by the guidance below.

We expect most Green Belt assessments to be undertaken by local authorities or appropriate groups of local authorities. Green Belt assessments should also inform the preparation of Spatial Development Strategies where these will be setting the strategic context for land release.

When updating or preparing plans, authorities will need to consider whether any existing Green Belt assessment remains up to date.

Paragraph: 002 Reference ID: 64-002-20250225

What are the key steps in a Green Belt assessment?

In order to assess the Green Belt in the relevant local or strategic development area effectively, authorities will need to:

- identify the location and appropriate scale of area/s to be assessed
- evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d), using the criteria identified below
- consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF
 (https://www.gov.uk/guidance/national-planning-policy-framework/2-achieving-sustainable-development#footnote7)
 (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area
- identify grey belt land
- identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan

Paragraph: 003 Reference ID: 64-003-20250225

How should authorities define the land to be assessed?

In assessing their Green Belt, it will in most cases be necessary for authorities to divide their Green Belt into separate assessment areas for the purpose of identifying grey belt. The number and size of assessment areas can be defined at a local level and respond to local circumstances. However, the following principles will need to be considered:

- when identifying assessment areas, authorities should consider all Green Belt within their Plan areas in the first instance
- to ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes
- a small number of large assessment areas will not be appropriate in most circumstances – authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary
- authorities should consider where it may be appropriate to vary the size
 of assessment areas based on local circumstances. For example, the
 assessment of smaller areas may be appropriate in certain places, such
 as around existing settlements or public transport hubs or corridors

Paragraph: 004 Reference ID: 64-004-20250225

How should the contribution land makes to the relevant Green Belt purposes be assessed?

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. Considerations for informing these judgements are set out below:

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

This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.

Contribution	Illustrative features
Strong	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. They are also likely to include all of the following features:
	be adjacent or near to a large built up areaif developed, result in an incongruous pattern of

Contribution	Illustrative features	
	development (such as an extended "finger" of development into the Green Belt)	
Moderate	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): - 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	Assessment areas that make only a weak or no contribution are likely to include those that: - 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 merging into one another

This purpose relates to the merging of towns, not villages.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - 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

Contribution	Illustrative Features
Moderate	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): - 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	Assessment areas that contribute weakly are likely to include those that: - 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

This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.

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

Contribution	Illustrative Features
	 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: 005 Reference ID: 64-005-20250225

How should the application of footnote 7 be considered when identifying land as grey belt?

As defined in the NPPF, grey belt excludes land where the application of 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. In reaching this judgement, authorities should consider where areas of grey belt would be covered by or affect other designations in footnote 7. Where this is the case, it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals.

Paragraph: 006 Reference ID: 64-006-20250225

Making an assessment of whether land is grey belt

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.

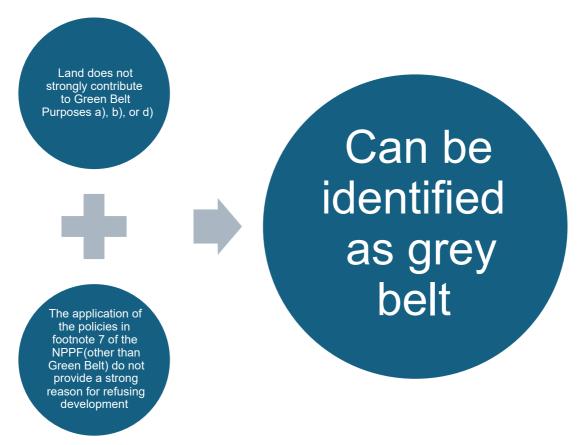


Figure 1. When can land be identified as grey belt

Paragraph: 007 Reference ID: 64-007-20250225

Considering the impact on the remaining Green Belt in the plan area

How can the impact of releasing or development on the remaining Green Belt in the plan area be assessed?

A Green Belt assessment should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

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.

Paragraph: 008 Reference ID: 64-008-20250225

Proposals on grey belt land

How can Green Belt assessments be used in the development management process?

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

In what circumstances should proposals on grey belt land be approved?

Where a site is judged to be grey belt, and to not fundamentally undermine the purposes of the remaining Green Belt across the plan area if released or developed, wider considerations will still be relevant to the consideration of development proposals on the site. These would include 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.

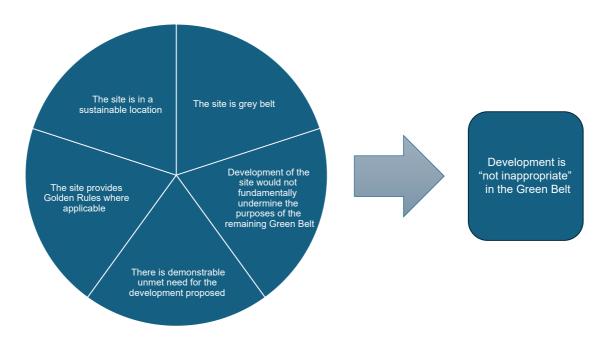


Figure 2. When is development in the Green Belt not inappropriate under paragraph 155 of the NPPF?

Paragraph: 010 Reference ID: 64-010-20250225

Identifying sustainable locations

How should authorities establish whether Green Belt land is in sustainable locations?

The Framework is clear that, when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location would be appropriate for the kind of development proposed. Similarly, when making decisions regarding planning applications on grey belt land, authorities should ensure that the development would be in a sustainable location. For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate.

Whether locations are sustainable should be determined in light of local context and site or development-specific considerations. However, in reaching these judgements, national policy is clear that authorities should consider opportunities to maximise sustainable transport solutions, as set out in <u>paragraphs 110 and 115 of the NPPF</u>

(https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport).

Paragraph: 011 Reference ID: 64-011-20250225

Golden Rules

Further guidance on Golden Rules for Green Belt development is set out in the <u>Viability guidance</u> (https://www.gov.uk/guidance/viability#golden-rules-forgreen-belt-development).

How can major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, contribute to accessible green space?

The following contributions to accessible green space should be considered:

- New residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; welldesigned; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.
- Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.
- Where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways).
- Proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.
- Where appropriate, authorities should consider the use of conditions or planning obligations. The Community Infrastructure Levy can also be used to fund improvements to existing greenspaces or the provision of new ones. Local authorities should consider arrangements for the longterm maintenance of green spaces.

Paragraph: 012 Reference ID: 64-012-20250225

Considering the potential impact of development on the openness of the Green Belt

What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?

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

Paragraph: 013 Reference ID: 64-013-20250225

How should harm to the Green Belt including harm to its openness be considered if a development is not inappropriate development?

Footnote 55 to the NPPF (https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land#footnote55) 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

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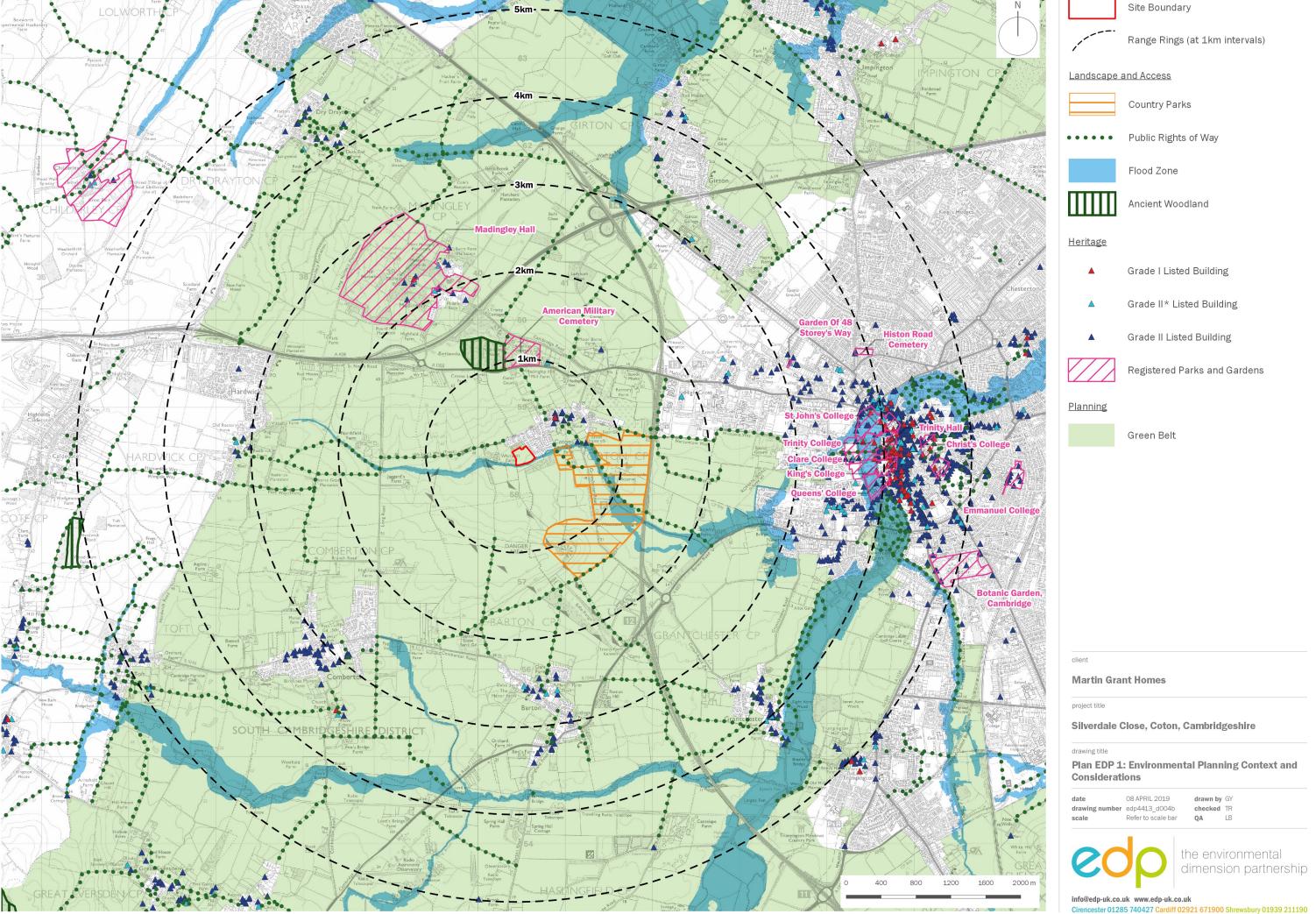




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Plans

Plan EDP 1: Environmental Planning Context and Considerations (edp4413_d004b 08 April 2019 GY/TR)





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