FPCR | environment & design

Green Belt Assessment

Client

British Land

Project

Land at South Trumpington, Cambridge

Date

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1.0 EXECUTIVE SUMMARY

1.1 This Green Belt Assessment has been prepared on behalf of British Land in support of the Greater Cambridge Local Plan 'Regulation 18 Consultation' exercise.

1.2 The promoter, British Land, owns the Site at Land at South Trumpington, Cambridge and are committed to promoting the Site through the emerging Greater Cambridge Local Plan.

1.3 British Land have a strong reputation of delivering state-of-the-art developments, in the best strategic locations, built and managed to British Land's industry-leading standards. They do this by bringing together their unique expertise in the delivery of complex developments, as well as their award-winning sustainability practices.

1.4 The submission, which this document forms part of, demonstrates that the Site is suitable, achievable, and deliverable for allocation and, ultimately, development, subject to future planning permission(s).

1.5 The purpose of this report is to support British Land's response to the Regulation 18 Consultation as part of the emerging Local Plan process. The report examines the information on Green Belt and the supporting evidence from the Regulation 18 publication. In addition the report summarises the HELAA 2025 assessment completed by the Council, and the "*Greater Cambridge Green Belt Assessment Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025*" prepared by LUC in October 2025, for the councils. Reference is also made to the draft NPPF published for consultation on 16 December 2025.

1.6 The report includes background to the Cambridge Green Belt, appraises the role the site plays in the purposes of the Cambridge Green Belt, and analyses the potential scheme against the 5 national Green Belt purposes. It also provides a judgement on whether the site would comprise "grey belt" as defined in the NPPF December 2024 and NPPG update released 27th February 2025.

1.7 This review examines the most recent Green Belt Assessment, the "*Greater Cambridge Green Belt Assessment - South Cambridgeshire District Council and Cambridge City Council, LUC August 2021*" completed for the Councils, and suggests that the site performs a more limited role against Green Belt purposes than suggested in the LUC 2021 Greater Cambridge Green Belt study. This LUC study draws on the earlier (2015) Cambridge Inner Green Belt Boundary Study, completed by LDA Design.

1.8 Whilst the councils have now published the Regulation 18 Consultation Local Plan, and have produced additional documents in support, including the Greater Cambridge Green Belt Assessment Response to Comments from First Proposals Consultation 2021 and Site Submissions update 2025, and the HEELA 2025, the latter documents appear not to engage with current Policy and Guidance and do not address the changed circumstances since the 2021 Green Belt Assessment was completed.

1.9 Circumstances have changed since the 2021 study was produced, with the completion of the residential-led Trumpington Meadows development and now the consent for the South West Travel Hub. These inevitably provide more containment and urban influence. FPCR consider that the site could be judged to have a "*limited*" role in the setting of Cambridge and in preventing the merging of settlements. In terms of Cambridge Green Belt purpose 1, preserving "*the unique*

character of Cambridge as a compact, dynamic city with a thriving historic centre", FPCR consider the site makes a "*Moderate*" contribution.

1.10 For the site to be judged to be "*grey belt*", under the NPPF 2024 and NPPG 2025, as the site is largely not previously developed, the NPPF and NPPG wording requires that land does not strongly contribute to any of Green Belt purposes (a), (b), or (d) in paragraph 143.

1.11 The FPCR analysis is that the land parcel containing the site does not strongly contribute to these three purposes and so should be considered to be "*grey belt*".

1.12 To meet the test of not being inappropriate development in the Green Belt, (as NPPF paragraph 155) the development must not "*fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*;" and also meet the other statutory tests of paragraph 155.

1.13 The LUC study considered the effect of taking the land parcel containing the site out of the Green Belt and the subsequent effect on the wider Green Belt. The LUC harm rating for this was "*Minor-Moderate*". FPCR concludes that, the site comprises grey belt land and would make an appropriate site for Green Belt release.

2.0 INTRODUCTION

2.1 This Green Belt Assessment has been prepared on behalf of British Land in support of the Greater Cambridge Local Plan "Regulation 18 Consultation" exercise.

2.2 The promoter, British Land, owns the Site at Land at South Trumpington, Cambridge and are committed to promoting the Site through the emerging Greater Cambridge Local Plan.

2.3 British Land have a strong reputation of delivering state-of-the-art developments, in the best strategic locations, built and managed to British Land's industry-leading standards. They do this by bringing together their unique expertise in the delivery of complex developments, as well as their award-winning sustainability practices.

2.4 The submission, which this document forms part of, demonstrates that the Site is suitable, achievable, and deliverable for allocation and, ultimately, development, subject to future planning permission(s)."

Purpose of the report

2.5 The purpose of this report is to support British Land's submission to the Regulation 18 Consultation as part of the emerging Local Plan process. The report examines the background to the Cambridge Green Belt, appraises the role the site plays in the purposes of the Cambridge Green Belt, and analyses whether the site would comprise "grey belt" as defined in the NPPF December 2024 and NPPG update released 27th February 2025. The report provides commentary on the relevant information contained in the Publication Regulation 18 Plan, the HELAA 2025, and the Greater Cambridge Green Belt Assessment Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025. Reference is also made to the draft NPPF published for consultation on 16 December 2025.

2.6 This report concludes that the site comprises a parcel of land that could be removed from the Green Belt, with limited effects on Green Belt purposes and that would not fundamentally undermine the purposes of the remaining Green Belt taken as a whole.

The Vision for South Trumpington

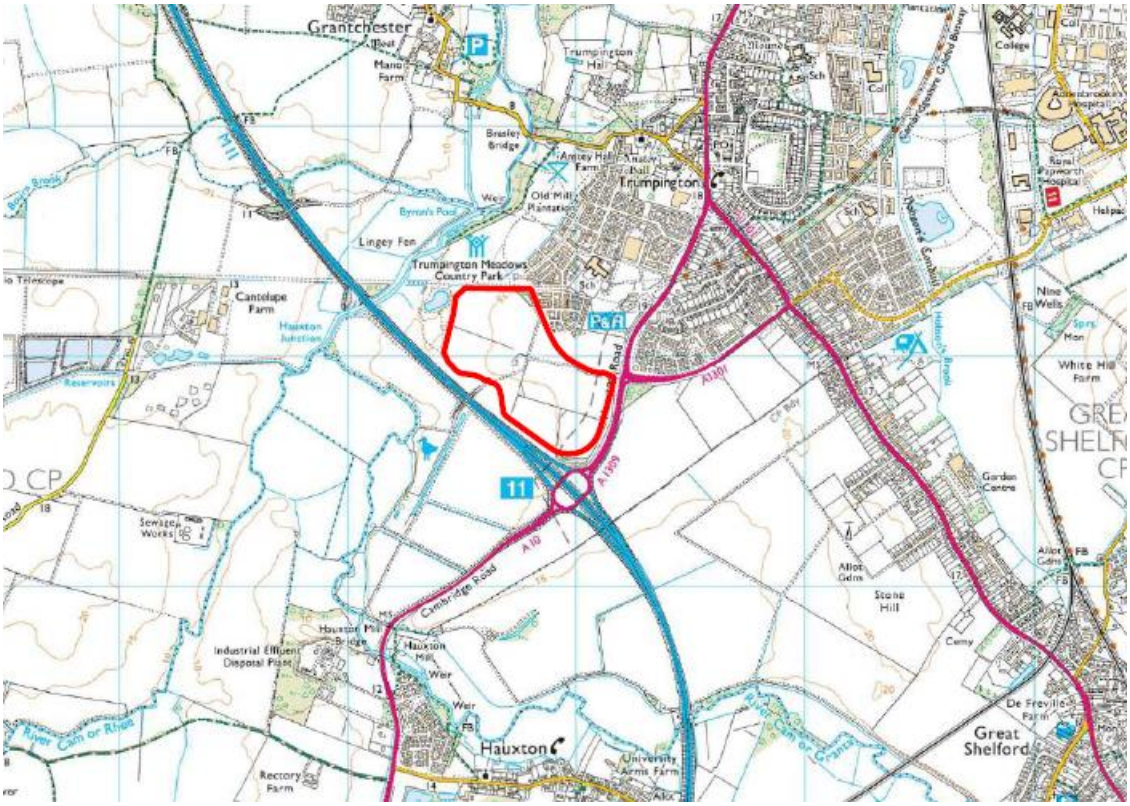
2.7 The Vision is to provide an exemplar and deliverable growth proposition for Cambridge, offering a rich mix of uses to potentially include, floorspace for a wide range of jobs (Offices, Science and Technology, R&D, Mid-Tech), a range of housing types including affordable and/or essential worker housing, community facilities, mobility hubs and complementary retail and workspace. There is an opportunity to extend the Country Park and provide routes through, connecting into the neighbouring Trumpington Meadows local centre.

The Opportunity

2.8 The Opportunity is to provide a deliverable growth proposition for Cambridge: a mixed-use urban extension comprising a range between 400-1,000 homes and up to approx. 260,000 sq. m (GEA) of other floorspace including flexible employment uses and supporting infrastructure. The range of floorspace and land use is necessary for flexibility at this early stage of the planning process as explained more fully in the supporting 'Vision Document' and will be explored further through design evolution and pre-application discussions with Greater Cambridge Shared Planning Service (GCSPS).

2.9 To inform the submission, an Illustrative Development Option has been prepared. The Illustrative Development Option as shown in the supporting Vision Document represents a commercially led, mixed-use proposal for the Site (approximately 225,000sq.m GEA and approximately 400 homes). The proposals have the scope to change throughout the process, subject to design evolution, viability and/or securing additional grant funding. The Opportunity seeks to promote the Site for Use Classes B, E, F, C1, C3 and Sui Generis.

The Site



2.10 The Site comprises a single parcel of agricultural land separated into smaller parcels by existing hedgerows and extends to approximately 30.1 hectares. The Site is also dissected by a cycle path that links Trumpington to the village of Harston to the south.

2.11 The Site is relatively flat, with a gentle fall west to east, but can appear to raise when looking eastwards from the west/northwest edges of the site.

2.12 The Site is located to the southwest of Cambridge City Centre. Land to the west of the Site forms Trumpington Meadows Country Park. To the south is the M11, beyond which is currently agricultural but is the site of the South West Travel Hub (SWTH) facility. To the east is the A1309 Hauxton Road, and land further east is also in agricultural use. To the north is the development of Trumpington Meadows, which continues to be developed. Part of the Site is currently used as construction welfare/ logistics associated with Trumpington Meadows.

3.0 BACKGROUND.

Greater Cambridge Green Belt Assessment - South Cambridgeshire District Council and Cambridge City Council, LUC August 2021

3.1 This study completed in 2021 for the Greater Cambridge Local Plan provides the most up to date evidence base for the councils and provides helpful background on the evolution of the Cambridge Green Belt. This report refers to this as the LUC study. The relevant background from the study is summarised below.

3.2 The aim of the LUC study was to provide an independent assessment which identified variations in openness and the extent to which land contributed to the purposes of the Green Belt. It then went on to use this to determine variations in the potential harm to those Green Belt purposes of releasing land within Greater Cambridge from the designation.

3.3 The National Planning Policy Framework (NPPF) sets out the role and function of Green Belt and defines the purposes of the designation. These purposes have been applied locally as the '*Cambridge Green Belt Purposes*', which differ in detail from the National Purposes and are set out in the relevant Local Plans.

3.4 The Cambridge Green Belt Purposes are to:

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

4.0 NATIONAL PLANNING POLICY AND GUIDANCE

4.1 Government policy on the Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF). Paragraph 142 of the NPPF states 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*".

4.2 This is expanded in NPPF paragraph 143, which states that Green Belts serve five purposes, as set out below.

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

b) to prevent neighbouring towns merging into one another;

c) to assist in safeguarding the countryside from encroachment;

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

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.3 Paragraph 145 of the NPPF sets out that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Paragraph 146 sets out that Exceptional Circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means.

4.4 Paragraph 148 states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other Green Belt locations. The site's location should also promote sustainable development.

4.5 The Glossary to the NPPF sets out the definition for grey belt

"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

4.6 At paragraph 149 the NPPF states that when defining Green Belt boundaries, plans should (amongst other things),

- not include land which it is unnecessary to keep permanently open;
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

4.7 Paragraph 151 states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land.

4.8 Paragraph 153 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Footnote 55 goes on to note "*Other than in the case of*

development on previously developed land or grey belt land, where development is not inappropriate."

4.9 The NPPF goes on to note forms of development that are not inappropriate in the Green Belt and at paragraph 155 sets out that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where, certain tests are met. This includes there being a demonstrable need, it is in a sustainable location and that

"*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*"

4.10 The "*Golden Rules*" should also be met for development on the Green Belt, which are set out in paragraphs 156 and 157 of the NPPF and include provision of affordable housing, improvements to infrastructure and provision of new or improved accessible green spaces.

4.11 Paragraph 159 sets out that the improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.

Planning Practice Guidance

4.12 National Planning Practice Guidance (NPPG), supplements the NPPF with guidance. An update to the guidance was released 27th February 2025. It sets out some of the factors that should be taken into account when considering the potential impact of development on Green Belt land and identifying grey belt land.

4.13 The NPPG 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".*

4.14 Under a section titled 'Assessing Green Belt to identify grey belt land' the NPPG notes:

"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."

4.15 At Paragraph 001 it continues:

"Where land is identified as grey belt land, any proposed development of that land should be considered against paragraph 155 of the NPPF, which sets out the conditions in which development would not be inappropriate on grey belt land".

4.16 A series of tables are set out at Paragraph 005, illustrating features that are likely to be noted against a 'Strong', 'Moderate' or 'Weak/None' contribution to Green Belt purposes a, b, and d.

- Purpose A – to check the unrestricted sprawl of large built up areas
- Purpose B – to prevent neighbouring towns merging into one another
- Purpose D – to preserve the setting and special character of historic towns

4.17 For brevity, the illustrative text descriptions are not reproduced in this chapter, but relevant extracts are referenced at Chapter 7 of this report where helpful to the discussion.

5.0 EVOLUTION OF THE CAMBRIDGE GREEN BELT

5.1 The background to the Cambridge Green Belt is helpfully set out in the Greater Cambridge Green Belt Assessment, August 2021. This is summarised below.

The origins of the Cambridge Green Belt go back to the Plan for Cambridge produced by Professor Sir William Holford and H. Miles Wright in 1950. In this several qualities people would want to retain were set out, that could be diminished or lost with large scale growth. These included the University; the central open spaces; plenty of gardens and allotments; short distance between homes and the central shops; the countryside near the town; and a distinctive market town character.

5.2 They recommended safeguarding a "*green line*" to prevent coalescence with Girton, Cherry Hinton and Grantchester. They added that "*green wedges*" along the river should be kept open to keep the countryside near the centre of the towns on its west side, and that development should be excluded from the foothills of the Gogs. Villages near the city boundary would require '*green belts*' between them and the town.

5.3 The concept of a city with a special character and compact size protected by a '*Green Belt*' emerged from the Holford and Miles Wright plan.

5.4 The first County Development Plan was approved by the Minister in 1954. In the Cambridge area, this was closely based on the Holford and Miles Wright plan.

5.5 The Greater Cambridge Green Belt Assessment, sets out that the inner boundary of the Cambridge Green Belt around the city was first defined in Town Map No.1 (Amendment No. 2), which was approved by the Minister in 1965. Town Map No. 2 defined the boundaries around the necklace villages and, whilst this was not formally approved, it was a material consideration in determining planning applications. The concepts within the early County Plan and Town Maps were later evolved within Structure Plans and Local Plans.

5.6 Over the following decades the concept of Green Belt and the detailed boundaries evolved, through the Cambridge structure Plan, National Planning Policy Guidance, and the Cambridge City and South Cambridgeshire Local Plans.

5.7 The Greater Cambridge Green Belt Assessment also identifies that the Cambridgeshire and Peterborough Structure Plan 2003 set out the current Cambridge Green Belt purposes and reaffirmed that Cambridge's historic nature was the reason for the existence of its Green Belt. The assessment noted at paragraph 2.23,

"With regard to the relationship to the National Green Belt purposes - as set out at the time in Planning Policy Guidance Note 2: Green Belts (1995) - paragraph 8.10 of the Examination in Public Panel Report (2003) [See reference 7] stated "it is not the role of the Structure Plan simply to reiterate national policy – it should interpret national policy as it relates to the strategic or local context. In the case of Cambridge, it only has a Green Belt because it is a historic city. It follows that all five purposes of Green Belts … are not necessarily relevant to this Green Belt".

5.8 It also went on to note,

"Paragraph 8.11 of the Panel Report went on to state that there are two purposes that are critical to the Cambridge Green Belt: the primary purpose being to preserve the special character of Cambridge and to maintain the quality of its setting; and the secondary purpose

being to prevent further coalescence of settlements. In regard to the special character of Cambridge, paragraph 8.9 of the Panel Report stated that the vision for Cambridge is of a "compact, dynamic city with a thriving historic centre" and that "apart from its unique historic character, of particular importance to the quality of the city are the green spaces within it, the green corridors which run from open countryside into the urban area, and the green separation which exists to protect the integrity of the necklace of villages. All of these features, together with views of the historic core, are key qualities which are important to be safeguarded in any review of Green Belt boundaries". It also suggests that all this could be the starting point for future Green Belt Reviews".

5.9 The wording of the Cambridge Purposes was carried forward to the current Cambridge Local Plan 2018 (CLP 2018) and the South Cambridgeshire Local Plan 2018 (SCLP 2018). The Inspectors' Local Plan Examination report in 2018 accepted the continued relevance of the three Cambridge Green Belt purposes as an application of national policy in a local context, reflecting "*the importance of Cambridge as a historic city and the particular role of the Green Belt in preserving its setting".*

5.10 The Greater Cambridge Green Belt Assessment includes a section on more recent changes to the Cambridge Green Belt, including the releases for development. It also notes at paragraph 2.35 that,

"Built development on these sites will undoubtedly cause further changes to the built up edge of Cambridge and may have an urbanising influence on adjacent Green Belt land".

Cambridge City Council and South Cambridge District Council Local Plans

5.11 Both Local Plans identify the Cambridge Green Belt purposes and reference National Green Belt policy. In addition, the South Cambridgeshire Local Plan sets out a number of factors that define the special character of Cambridge. These are listed below.

- 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.

Previous Green Belt studies completed for the authorities.

5.12 A range of studies have been carried out over the years, with varied levels of acceptance by inspectors at the Local Plan examinations. The most relevant studies are the last two, the Cambridge Inner Green Belt Study, 2015, produced by LDA Design and the Greater Cambridge Green Belt Assessment August 2021, produced by LUC. The findings of the latter study are examined in section 6 of this report, and the LUC study incorporates the findings of the 2015, Cambridge Inner Green Belt Study.

5.13 The Cambridge Inner Green Belt Study, 2015, used a qualitative process assessing a series of areas for their relative importance to Green Belt purposes and then consideration was given to whether there was potential to release land for development without significant harm to Green Belt purposes.

5.14 As part of this study 16 qualities of Cambridge were identified, based on earlier studies and policy documents. These were as follows,

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

5.15 The qualities were still considered relevant in the Greater Cambridge Green Belt Assessment 2021, explored in section 6 of this report.

6.0 GREATER CAMBRIDGE GREEN BELT ASSESSMENT - SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL AND CAMBRIDGE CITY COUNCIL, LUC AUGUST 2021

Approach

6.1 The LUC study noted that at the time of publication there was no defined approach set out in national planning policy or guidance as to how Green Belt studies should be undertaken, and this was correct. The guidance now offered by the NPPF 2024 and NPPG 2025 change this and together they provide more clarification with regard to assessing the contribution that land makes to Green Belt purposes, as well as outlining considerations involved in determining and identifying grey belt land – a concept that didn't exist in 2021.

6.2 The LUC study evaluates a series of land parcels on the edge of Cambridge and the surrounding settlements and draws conclusions on the contribution of the relevant parcels to the Cambridge Green Belt purposes, and on the level of harm for removal of the parcels from the Green Belt. The land at Trumpington South lies within a parcel described as TR6. The detailed findings from the study for TR6 are set out in Appendix B to the LUC study and are evaluated in the section below.

Parcel Evaluation TR6

6.3 The boundary of parcel TR6 is shown below. This includes the site and part of the country park to the west.

6.4 The study describes parcel location and openness, and states

Parcel size: 52.68ha

The parcel is located to the south of Cambridge (Trumpington) and to the west of Trumpington Park and Ride. The parcel contains Trumpington Meadows Country Park, and is bordered by Hauxton Road to the southeast, the M11 motorway to the west, and the River Cam to the north. A Scheduled Monument lies to the northwest of the parcel (Romano-British settlement SW of Trumpington).

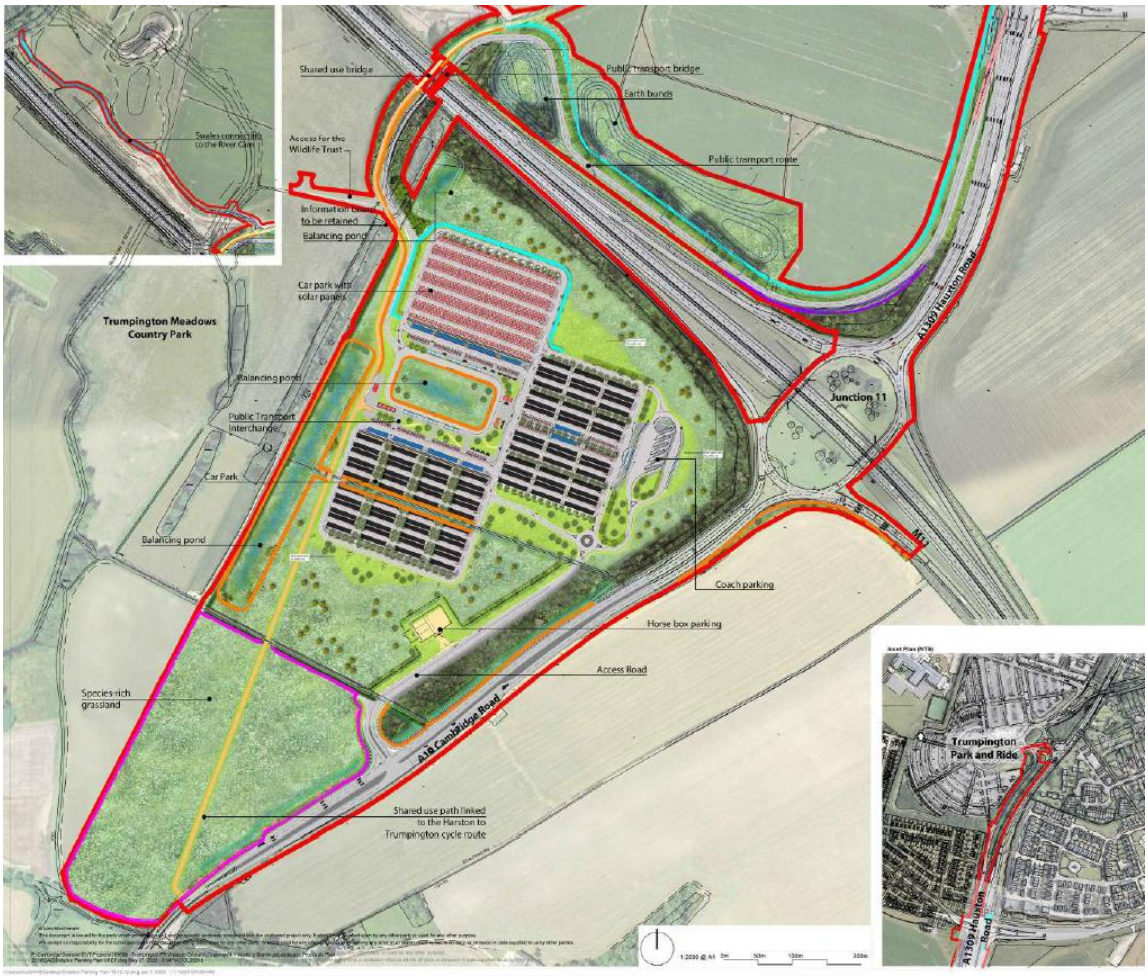
Land is open. There is no development of a scale, character or form that has a significant impact on Green Belt openness.

6.5 It is true that there is no development within the parcel itself that has a significant effect on Green Belt openness, however the parcel lies immediately south of the Trumpington Meadows development, which includes up to 4 storey buildings with the occasional taller buildings. Examination of historic aerial photographs on Google earth pro, suggest that in 2020, only the northern part of Trumpington Meadows was developed. It seems likely that at the time the LUC fieldwork was undertaken, that there were few buildings close to the parcel boundary. The situation as experienced on the ground now, is likely to be notably different to that in 2021 when the LUC study was published. There is little landscape edge treatment to Trumpington Meadows. The parcel TR6 is now strongly visually influenced by the existing development adjacent to it, and this is judged to affect visual openness.

6.6 Under the heading "*Distinction between parcel and inset area*" the LUC study notes,

"There is no boundary to create distinction between the parcel and the urban area of Cambridge. However, the parcel extends a significant distance from the inset area and therefore views are dominated by open countryside. Furthermore, the parcel is not contained by urban development. Although the landform and land cover within the parcel do not create any additional distinction from Cambridge there is, overall, moderate distinction between the parcel and the urban area."

6.7 In addition to the M11 and the dual carriageway, further approved built development to the south of the M11 in the form of the Travel Hub, will change the context of parcel TR6 from the time it was assessed. The Travel Hub is largely a car park with some buildings, and tall lighting and is not a use that is deemed compatible in terms of openness of the Green Belt. The plan for the Travel Hub is shown below.



6.8 The LUC study methodology sets out how boundary features create distinction. Under the heading strength of boundary features, motorways and dual carriageways are cited as features that help form a strong boundary. Whilst these are not adjacent to the existing settlement edge, they would form strong boundaries for a future Green Belt release.

6.9 In terms of distinction the LUC methodology notes at paragraph 3.56 that visual dominance of development within an inset settlement may increase association with that settlement. Within parcel TR6, FPCR judge that there is visual dominance from adjacent buildings to parcel TR6, which increases association with Cambridge rather than wider countryside. The Travel Hub when developed will further dilute distinction.

6.10 In terms of contribution to Green Belt Purposes the conclusions of the LUC study and the FPCR appraisal are set out below. This uses the criteria and definitions from the LUC study.

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

6.11 The LUC study notes,

Contribution: Relatively significant

Land is open and adjacent to the main urban area of Cambridge. The parcel has some relationship with the urban area but also a degree of distinction from it. Overall, the parcel makes a relatively significant contribution to Cambridge Purpose 1.

6.12 FPCR consider that the contribution to this purpose is Moderate. This is due to the parcel being open and close to the main urban area of Cambridge. Its contribution has weak distinction from the urban edge, due to the influence and partially containment offered by recent development at Trumpington Meadows and the infrastructure of the Travel Hub, beyond the M11, and associated route around the edge of the site.

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

6.13 The LUC study notes,

Contribution: Moderate

Land falls within Trumpington Meadows Country Park and forms part of the immediate setting of a Scheduled Monument to the west (Romano-British settlement site SW of Trumpington). It therefore makes some positive contribution to the character of the landscape and the quality of Cambridge's setting. Whilst land is relatively distant from the historic core of Cambridge and has no direct visual inter-relationship with it (due to intervening built development), it forms part of an open landscape visible on the edge of the city in distant elevated views from the south and south-east (including from St Margaret's Mound and Chapel Hill).

Overall, the parcel makes a moderate contribution to Cambridge Purpose 2.

6.14 FPCR agree that the land is relatively distant from the historic core of Cambridge and has no direct visual inter-relationship with it (due to intervening built development). At the time of the FPCR survey, the site could not be seen from St Margarets Mount Little Shelford, or Chapel Hill Haslingfield. The setting of the Romano-British settlement site SW of Trumpington is now established by the Trumpington Meadows development and the Country Park.

6.15 The LUC methodology sets out two parts to the assessment of contribution to the setting of Cambridge. The first element relates to its Rural Character, and this is deemed to be set by usage, its openness and the extent it relates to settlement or wider countryside. The parcel is mostly arable land, with some previously developed land. Its visual openness is however influenced by the existing hard edge of Trumpington Meadows and the highway infrastructure and will be further influenced by the travel Hub when developed. Parcel TR6 does not have a strongly rural character.

6.16 Element 2 covers features that contribute to the quality of Cambridge's setting, and six categories/ features or aspects are noted in the LUC study. These are,

1 – Visual interrelationships between Cambridge and the surrounding countryside

2 – Green corridors penetrating into the City

3 – Short and/or characteristic approaches to the historic core and other key approaches to the city

4 – Designated sites and other features contributing positively to the character of the landscape setting

5 – The scale, character, identity and rural setting of the Green Belt villages

6 – Topography providing a framework to the city

6.17 Parcel TR6 does not perform strongly against any of these criteria.

6.18 Overall FPCR consider that parcel TR6 in its current context, makes a relatively limited contribution to this purpose. This is because the land use is not associated with the settlement, land is open and does not have a strong distinction from Cambridge. It has some rural character. It contains no features that contribute specifically to the quality of Cambridge's setting.

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

6.19 The LUC study notes,

Contribution: Moderate

Land is open and lies in a moderate gap between Hauxton and Cambridge (Trumpington), but there are some significant separating features, including the A10 and wooded areas. The parcel has some relationship with the urban area but also a degree of distinction from it.

Overall, the parcel makes a moderate contribution to Cambridge Purpose 3.

6.20 Since the time the LUC study was undertaken, consent has been granted for the Travel Hub, south of the M11 and between Cambridge and Hauxton. Parcel TR6 lies north of the M11. There are significant separating features, most notably the M11, and notable planting in Trumpington Meadows Country Park.

6.21 FPCR consider that the parcel makes a Relatively Limited contribution to this purpose. The land is relatively open and lies in a moderate gap between settlements. It has moderate distinction from the settlement edge.

Impact on contribution of adjacent Green Belt

6.22 The LUC study notes,

"Release of land as an expansion of Cambridge:

Rating: Minor-moderate

Release of land in this parcel would have some limited impact on the perceived gap between Trumpington and Hauxton, although the M11 would remain as a significant separating feature. The parcel is well contained by the M11 to the southwest, and by a shallow wooded valley to the west, but its release would create some urbanising containment of land to the north.

Land to the east of the parcel does not make a stronger contribution to any of the Green Belt purposes. Any impact on this land would not therefore increase overall harm."

6.23 FPCR judge that there would be very little impact on the perceived gap between Cambridge and Hauxton, with the M11 forming a very strong boundary, and now with the proposed Travel Hub providing further separation. The "*shallow wooded valley to the west*" noted by LUC is the River Cam and this does provide visual containment, and due to its value in the context of Cambridge is likely to be protected in the long term.

6.24 The surrounding built development at Trumpington Meadows and the M11/ Travel Hub, means that the only open edge is adjacent to the dual carriageway Hauxton Road, in an area also influenced by built development. Overall, for these reasons FPCR consider there would be a Minor harm rating on the impact on the contribution of adjacent Green Belt.

Overall harm of Green Belt release

6.25 The LUC study notes,

"Parcel TR6 makes a relatively significant contribution to preserving Cambridge's compact character, and a moderate contribution to maintaining and enhancing the quality of Cambridge's setting and to preventing communities in the environs of Cambridge from merging with the city. The additional impact on the adjacent Green Belt of the release of the parcel would be minor-moderate. Therefore, the harm resulting from its release, as an expansion of Cambridge, would be high."

6.26 FPCR have concluded that the parcel makes a Moderate contribution to preserving the unique character of Cambridge, a Relatively Limited contribution to maintaining and enhancing the quality of Cambridge's setting, and a Relatively Limited contribution to preventing communities from merging into one another and with the city.

6.27 FPCR have also concluded that there would be a Minor level of harm to the impact on the contribution of adjacent Green Belt. This leads to an overall conclusion that the harm resulting from its release, as an expansion of Cambridge, would be Low.

7.0 EVALUATION AGAINST THE NPPF 2024, NPPG 2025 AND "GREY BELT"

7.1 This section examines how the Site would fare when tested against National policy including the contribution that land makes to Green Belt purposes and making an assessment of whether land is grey belt.

7.2 The NPPF 2024 does not change the fundamental aims and purposes of Green Belt.

7.3 Paragraph 148 of the NPPF sets out that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. The majority of the South Trumpington site is not previously developed land.

7.4 The next part of the test is therefore to consider whether the site could be considered grey belt. The NPPF Glossary defines this as land which, "*does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143".* This is reinforced in the NPPG which clarifies at Paragraph 007:

"… 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".

7.5 The starting point for judgements on the role of the land in contributing to Green Belt purposes are the existing studies. In this case the LUC 2021 Greater Cambridge Green Belt study is the most recent. Within this study the site forms a large part of land parcel TR6. The headings in the study use slightly different terms, to "*strongly contribute*" so judgement is required as to how the evaluation now meets the requirements of national policy for the definition of grey belt.

7.6 Circumstances have also clearly changed since the LUC study was completed and the FPCR analysis at section 6 of this report uses the LUC methodology and comes to different judgements and conclusions in light of the current circumstances.

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

7.7 This Cambridge Purpose 1 crosses over with National Green Belt Purpose a) *to check the unrestricted sprawl of large built up areas.* The study notes that the land parcel including the site makes a "*Relatively significant*" contribution to this purpose.

7.8 FPCR consider that the contribution to this purpose is "*Moderate*" under the LUC methodology. This due to the parcel being open and close to the main urban area of Cambridge. Its contribution has weak distinction from the urban edge, due to the influence of the exiting development at Trumpington Meadows and the infrastructure of the Travel Hub, beyond the M11, and associated route around the edge of the site.

7.9 The NPPG notes that a Moderate contribution to purpose A may be illustrated by the following features:

"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".

7.10 FPCR consider that the parcel makes a "*Moderate*" contribution to national Green Belt purpose A. Therefore, it does not "*strongly contribute*" to purpose 1. On this basis the Site meets the criteria for grey belt in terms of National Purpose A.

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

7.11 This Cambridge Purpose 2 aligns with National Green Belt purpose d) *to preserve the setting and special character of historic towns.*

7.12 The LUC study notes, the contribution of parcel TR6 to this purpose is "*Moderate*"

7.13 FPCR consider that the land parcel containing the site is relatively distant from the historic core of Cambridge and has no direct visual inter-relationship with it (due to intervening built development).

7.14 The LUC methodology sets out two parts to the contribution to the setting of Cambridge. The first element relates to its Rural Character, and this is deemed to be set by usage, its openness and the extent it relates to settlement or wider countryside. The parcel is mostly arable land, with some previously developed land. Its visual openness is however influenced by the existing hard edge of Trumpington Meadows and the highway infrastructure and will be further influenced by the travel Hub when developed. Parcel TR6 does not have a strongly rural character.

7.15 Element 2 covers features that contribute to the quality of Cambridge's setting, and six categories/ features or aspects are noted in the LUC study. These are:

1 - Visual interrelationships between Cambridge and the surrounding countryside

2 - Green corridors penetrating into the City

3 - Short and/or characteristic approaches to the historic core and other key approaches to the city

4 - Designated sites and other features contributing positively to the character of the landscape setting

5 - The scale, character, identity and rural setting of the Green Belt villages

6 - Topography providing a framework to the city.

7.16 Parcel TR6 does not perform strongly against any of these criteria.

7.17 Overall FPCR consider that parcel TR6 in its current context, makes a "*relatively limited*" contribution to this purpose under the LUC methodology. This is because the land use is not associated with historic settlement, land is open and is separated to some extent from historic aspects of the town by existing development. It has some rural character but comprises intensively managed agricultural farmland contained by modern 21st Century development at

Trumpington Meadows and motorway and dual carriageway highway infrastructure. It contains no features that contribute specifically to the quality of Cambridge's setting.

7.18 Under 'Moderate' contribution to National Purpose D, the NPPG offers the following clarification:

"Moderate

Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to):

- being separated to some extent from historic aspects of the town by existing development or topography

- containing existing development

- not having an important visual, physical, or experiential relationship to historic aspects of the town.

7.19 FPCR consider that making a "*Moderate*" contribution to national Green Belt purpose D means it does not make a "*strong contribution*" and so the Site would meet the criteria for grey belt in terms of National Purpose D.

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

7.20 This Cambridge Purpose 3 aligns with National Green Belt purpose b) *to prevent neighbouring towns merging with one another.* The NPPG is clear that for Green Belt purposes "*Villages should not be considered large built up areas*", and that Purpose B "*relates to the merging of towns, not villages".*

7.21 The LUC study considers parcel TR6 makes a "*Moderate*" contribution to this purpose.

7.22 Since the time the LUC study was undertaken, consent has been granted for the Travel Hub, and at the time of writing this report, exploratory works had already commenced on the site south of the M11 and between Cambridge and Hauxton. Parcel TR6 lies north of the M11. There are significant separating features, most notably the M11, and planting in Trumpington Meadows Country Park.

7.23 FPCR consider that the parcel makes a "*Relatively Limited*" contribution to this purpose now under the LUC methodology.

7.24 Under '*Moderate*' contribution to National Purpose B, the NPPG offers the following clarification:

"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".

7.25 In making a "*Moderate*" contribution to national Green Belt purpose B means it does not make a "*strong contribution*". As such, the Site would meet the criteria for grey belt in terms of National Purpose B.

7.26 The Site is not a habitat site and/or designated and therefore does not conflict with NPPG footnote 7.

Whether taking the site out of the Green Belt would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan

7.27 Paragraph 155 of the NPPF sets out that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where:

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

7.28 The development also needs to meet other criteria such as, a demonstrable unmet need, be in a sustainable location and meet the "*Golden Rules*" as NPPF 156-157.

7.29 The LUC study considered the role of parcel TR6 on the contribution of the adjacent Green Belt as part of a release of land as an expansion of Cambridge. The study noted:

"Release of land in this parcel would have some limited impact on the perceived gap between Trumpington and Hauxton, although the M11 would remain as a significant separating feature. The parcel is well contained by the M11 to the southwest, and by a shallow wooded valley to the west, but its release would create some urbanising containment of land to the north.

Land to the east of the parcel does not make a stronger contribution to any of the Green Belt purposes. Any impact on this land would not therefore increase overall harm."

7.30 The latest update to the NPPG does not offer additional clarification to help consideration of purposes C or E. In terms of national purpose C, the Site is contained and influenced by development and does not exhibit a strong rural character. Removal of the Site from Green Belt would not undermine purpose E, as all land around Cambridge is likely to perform similarly. This report has already established that the Site does not strongly contribute to national purposes A, B and D. As such, removal of the Site from Green Belt would not undermine purposes as a whole.

7.31 The overall conclusion of the LUC study broadly concurred with this. It identified a "*Minor Moderate*" harm rating for Parcel TR6. This level of rating for taking land out of the Green Belt and developing it, cannot be considered to "*fundamentally undermine*" the purposes taken as a whole.

8.0 GREATER CAMBRIDGE GREEN BELT ASSESSMENT RESPONSE TO COMMENTS FROM FIRST PROPOSALS CONSULTATION 2021 AND SITE SUBMISSIONS UPDATE 2025

8.1 LUC who prepared the 2021 Green Belt assessment, prepared the update. The report references the Trumpington site under reference 58794: Land to the north of M11 and west of Hauxton Road, Trumpington.

8.2 The LUC response notes at paragraph 2.206, the representations made on the first proposals consultation, that parcel TR6, of which the site forms a part, should have been subdivided to reflect the distinction between agricultural land and land in Trumpington Meadows Country Park. The LUC response notes that whilst there is some distinction in landscape character between the country park in the west/north of TR6 and the agricultural land in the east/south, in LUC's opinion this does not translate to a difference in ratings with regard to the Green Belt purposes. LUC consider that the release of any land in the parcel would in turn weaken the remaining open space between Trumpington and the River Cam and M11.

8.3 FPCR disagree. There is no need to safeguard land between Trumpington and the M11 and the country Park, safeguards the River Cam.

8.4 The report also noted at paragraph 2.208

The site's development masterplan proposes to retain much agricultural land and to create a strong new Green Belt boundary zone between the development and the M11 that would, in combination with the proposed new Park and Ride to the south of the M11, prevent any future urban sprawl or encroachment on the countryside.

8.5 Within the proposed site, agricultural land would not be retained, but the M11 and the works associated with the Park and Ride (the South West Travel Hub) would form a strong boundary, preventing further sprawl. The LUC response notes that its assessment does not assess potential mitigation but does acknowledge that mitigation can influence the impact on retained Green Belt land. The LUC response notes that the Park and Ride were not taken into account in the 2021 assessment

"as there are too many uncertainties and potential permutations to carry out a meaningful cumulative harm assessment without first having identified a shortlist of potential allocations."

8.6 This was reasonable in 2021 but does not apply in a November 2025 response as the South West Travel Hub is now approved, and details are available to assess. The South West Travel Hub makes a significant difference to how the effects on Green Belt purposes can be assessed, by establishing a large area of built development, beyond the site.

8.7 Overall, the "*Greater Cambridge Green Belt Assessment Response to Comments from First Proposals Consultation 2021 and Site Submissions Update 2025*", does little more than reiterate the conclusions from the 2021 Green Belt Assessment, and does not recognise the change in circumstances from that time, particularly in relation to the development of the South West Travel Hub.

9.0 HELAA ASSESSMENT

9.1 The councils have published the HELAA assessment for the site, with reference 115169 and this makes a brief reference to Green Belt, under the heading "Landscape Comment 2025". This stated;

9.2 "Having considered the additional information, the assessment score has not changed. Development of this site would cause harm to the Cambridge Green Belt. The land plays a crucial role in containing urban sprawl, establishing a setting for the city and buffering it from the M11. The new proposals do not alter previous comments regarding this piece of land"

9.3 The conclusions appear to draw on the LUC Green Belt site submissions update, which did not take into account the changed circumstances around the site, including development of the Park and Ride. The brief and dismissive comments do not provide a detailed evaluation, or in fact reference any to the material submitted with the Sites Submission Update March 2025.

10.0 DRAFT GREATER CAMBRIDGE LOCAL PLAN FOR CONSULTATION (REGULATION 18)

10.1 The plan was published for consultation in November 2025. The draft plan includes policy S/GB. This states;

Policy S/GB: The Cambridge Green Belt

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

a. preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre.

b. maintain and enhance the quality of its setting; and

c. prevent communities in the environs of Cambridge from merging into one another and with the city

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

10.2 This policy reflects the particular Green Belt purposes as they apply to Cambridge and are unchanged from the earlier versions of the Local plan.

10.3 The supporting information goes on to set out the factors that define the special character of Cambridge and its setting. Again, these are unchanged from the earlier plans.

10.4 The supporting text goes on to reference the Cambridge Green Belt Assessment 2021, and to state that this "*assesses the contribution of different parcels of land to these purposes and to identify grey belt land to inform plan making in line with the NPPF and national guidance*".

10.5 This must be wrong. The concept of grey belt only emerged in the 2024 version of the NPPF. The concept was not around in 2021, and the LUC 2021 Green Belt Assessment does not consider or identify Grey Belt Land. The "*Greater Cambridge Green Belt Assessment Response to Comments from first proposals consultation 2021 and site submissions update 2025*" makes one reference to grey belt at paragraph 1.7 stating that in that document it

"does not provide revised assessments to take account of any development applications approved since the GCGBA analysis was carried out, or any national planning policy changes that have occurred since then. The Councils have commissioned an update to the GCGBA to respond to changes in national planning policy, particularly in response to new policy regarding grey belt."

10.6 The last version of the NPPF was published in December 2024, with updated guidance on Green Belt including Grey Belt in February 2025. The changes marked a significant shift in Green Belt Policy. The LUC update was dated October 2025, some 10 months after the NPPF. The PPG is clear that when an authority reviews its Green Belt, it should identify grey belt land. That this update did not take account of current national policy or guidance, or approved planning applications means that the update report is of little relevance and should be given little weight. At the time of drafting this response the update to the GCGBA has not been published and so it cannot be scrutinised.

11.0 DRAFT NPPF DECEMBER 2025

11.1 The Draft NPPF was published on the 16 December 2025, for consultation. Green Belt purposes were restated and unchanged. In terms of Plan making the Draft NPPF states at GB2 .3 that

"The preparation of local plans should be informed by an assessment, conducted in accordance with the process at Annex E, which identifies grey belt and informs any Green Belt boundary alterations which accord with policy GB3."

11.2 The existing NPPF already recommends an up to date Green Belt assessment to support plan making. It is understood that this has been commissioned but is not available at the time of drafting this response. Guidance on Green Belt assessment, currently in national Planning Policy Guidance, as been brought directly into the Draft NPPF at Annex E.

11.3 Draft Policy GB4 Defining Green Belt Boundaries includes a range of guidance including at point f;

Ensure Green Belt boundaries are defined clearly, using physical features that are readily recognisable and likely to be defensible;

11.4 The M11 provides a clearly defensible boundary. The existing settlement edge is stark against the arable field, not providing an attractive settlement boundary.

11.5 Draft Policy GB7 covers Development which is not inappropriate in the Green Belt. This includes a list of land uses carried forward from the existing NPPF, including development that 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 (along with meeting a number of other requirements)

11.6 In addition the draft NPPF includes a new category at point h, of

Development for housing and mixed-use development which would:

i. be within reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment;

ii. be physically well-related to a railway station or a settlement within which the station is located;

iii. be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;

iv. not prejudice any proposals for long-term comprehensive development in the same location;
v. in the case of major development, comply with policy GB8

11.7 The proximity to rail, is dealt with in the transport and planning assessments.

11.8 The site is physically well related to the settlement, with development already adjacent with enclosure formed by the M11 and the Park and Ride site.

11.9 Annex E Green Belt Assessments, provides guidance on how assessments should be completed. This notes that amongst other things

ii. ensure assessment areas are small enough to enable variations in their

contribution to the Green Belt purposes to be assessed;

iv. facilitate identifying areas of grey belt by subdividing areas into smaller assessment units where this is necessary; and

v. 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;

b. Identify areas of grey belt land, as defined in the glossary, by evaluating the contribution each assessment area makes to Green Belt purposes (a), (b), and (d) set out in GB2, using the criteria below.

c. Identify whether 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.

11.10 This has not yet been completed for the Trumpington site by the councils.

11.11 The criteria for evaluating the contribution to Green Belt purposes a, b and d are now contained in Annex E. but the wording is virtually the same as in the existing Planning Policy Guidance.

11.12 The Glossary to the draft NPPF sets out the definition of grey belt. This is as the existing NPPF, except that the exclusion relating to land where the application of policies relating to areas or assets in footnote 7 (other than green belt) would provide a strong reason for refusing or restricting development, no longer forms part of the new draft definition.

12.0 CONCLUSIONS

12.1 This review concludes that the land parcel / site performs a more limited role against Green Belt purposes than suggested in the LUC 2021 Greater Cambridge Green Belt study. The NPPF 2024 and NPPG 2025 clarification has been published since the LUC study was completed and these publications have been considered within this report. Whilst the councils have now published the Regulation 18 Consultation Local Plan, and have produced additional documents in support, including the Greater Cambridge Green Belt Assessment Response to Comments from First Proposals Consultation 2021 and Site Submissions update 2025, and the HELLA 2025, the latter documents appear not to engage with current Policy and Guidance and do not address the changed circumstances since the 2021 Green Belt Assessment was completed Whilst new assessments are reported as being completed, they are currently not published. The implications of this, is that it is not possible to comment on them, or to see if they have followed the correct approach.

12.2 Circumstances on the ground have changed since the 2021 study was produced, with the completion of the adjacent Trumpington Meadows residential-led development and recent consent for the South West Travel Hub. These inevitably provide more containment and urban influence. FPCR consider that the site could be judged to have a limited role in the setting of Cambridge and in preventing the merging of settlements. In terms of Cambridge Green Belt purpose 1, preserving "*the unique character of Cambridge as a compact, dynamic city with a thriving historic centre*", FPCR consider the site makes a "*Moderate*" contribution.

12.3 For the site to be judged to be "*grey belt*", as the site is largely not previously developed, the NPPF wording and NPPG clarification require that land does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. FPCR analysis within this report identifies that the land parcel containing the site does not strongly contribute to these three purposes and so the Site should be considered to be "*grey belt*".

12.4 To meet the test of not being inappropriate development in the Green Belt, (as NPPF paragraph 155) the development must not "*fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*"

12.5 The LUC study considered the effect of taking the land parcel containing the site out of the Green Belt and the subsequent effect on the wider Green Belt. The LUC harm rating for this was "*Minor-Moderate*". FPCR have also concluded that there would be a Minor level of harm to the impact on the contribution of adjacent Green Belt. This leads to an overall conclusion that the harm resulting from its release, as an expansion of Cambridge, would be Low. FPCR conclude therefore that development on the site should be considered in accordance with NPPF paragraph 155, in terms of the development not being inappropriate in the Green Belt, and that the site comprises an appropriate location for Green Belt release.

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