

**East Cambridgeshire Local Plan
Examination**

Matter 7 – Hearing Statement

Representor Number: 986279

September 2018

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1 Introduction

- 1.1 This Representation has been produced by Deloitte LLP on behalf of the Church Commissioners for England (CCfE) in respect of the East Cambridgeshire District Council Local Plan Stage 2: Inspector's Matters Issues and Questions for Examination. This Hearing Statement only seeks to provide comments on Matter 7.
- 1.2 The CCfE has previously made representations during the stage 1 of the Local Plan Hearing sessions.

2 Response to Matter 7: Promoting health communities, design, natural environment and green infrastructure

2.1 This Section of our Response provides comments on the questions asked under Matter 7 of the Inspector's document.

Question 25 - Is the designation of land as a Green Wedge, and the related policy Witchford6: Green Wedges, justified, and consistent with national policy? What is the difference between a Green Wedge and a Local Green Space?

2.2 We object to the application of a Green Wedge designation at Witchford, which we do not consider justified, effective, or consistent with national policy. We raise the following points to support our objection.

Context

2.3 The background to the proposed Green Wedge designation at Witchford relates to the Council's original intention to allocate land for housing in the same area. This is clear from a review of the Submission draft Proposals Map, which was considered by Full Council on 5th October 2017, and contained the green wedge designations (Witchford7) and mixed use development allocation (WFD.M1) for 720 homes at Witchford (Please see Appendix 1).

2.4 The draft allocation (WFD.M1) was removed following a revised set of recommendations tabled on the night of the Full Council meeting (on 5th October 2017), which approved the Submission Plan. The purpose of the northern Green Wedge designation was to maintain a green separation between the two parcels of proposed housing development. The purpose of the southern Green Wedge was to maintain some separation between the proposed housing development immediately to the north, on the other side of Main Street, and the Lancaster Way Business Park to the south.

2.5 The draft allocation (WFD.M1) and the Green Wedge designation were therefore an integrated part of the same proposal. The Green Wedges were only set out in the Plan as part of the draft housing allocation (WFD.M1) in the Draft Submission Plan (Please refer to Appendix 1), not before, as a standalone designation in either the Preliminary Draft Local Plan in February 2016 or the Further Draft Local Plan in January 2017. Therefore, their application does not relate to a requirement emanating from the relationship of the Green Wedge land to the existing Witchford settlement pattern or indeed the employment allocation (ELY.E2a) at Lancaster Way, but instead were only considered necessary in the context of the now removed draft allocation (WFD.M1).

2.6 When Members voted to remove the allocation (WFD.M1) at Full Council (5th October 2017), the focus of the discussion related solely to deleting the allocation, which formed the allocation. It would therefore appear to have been an oversight that the Green Wedges were not discussed at the meeting and also removed at the same time from the Plan.

Policy Purpose

2.7 The proposed Green Wedges at Witchford do not meet the function and policy aims of Policy Witchford6. Taking each stated function in turn:

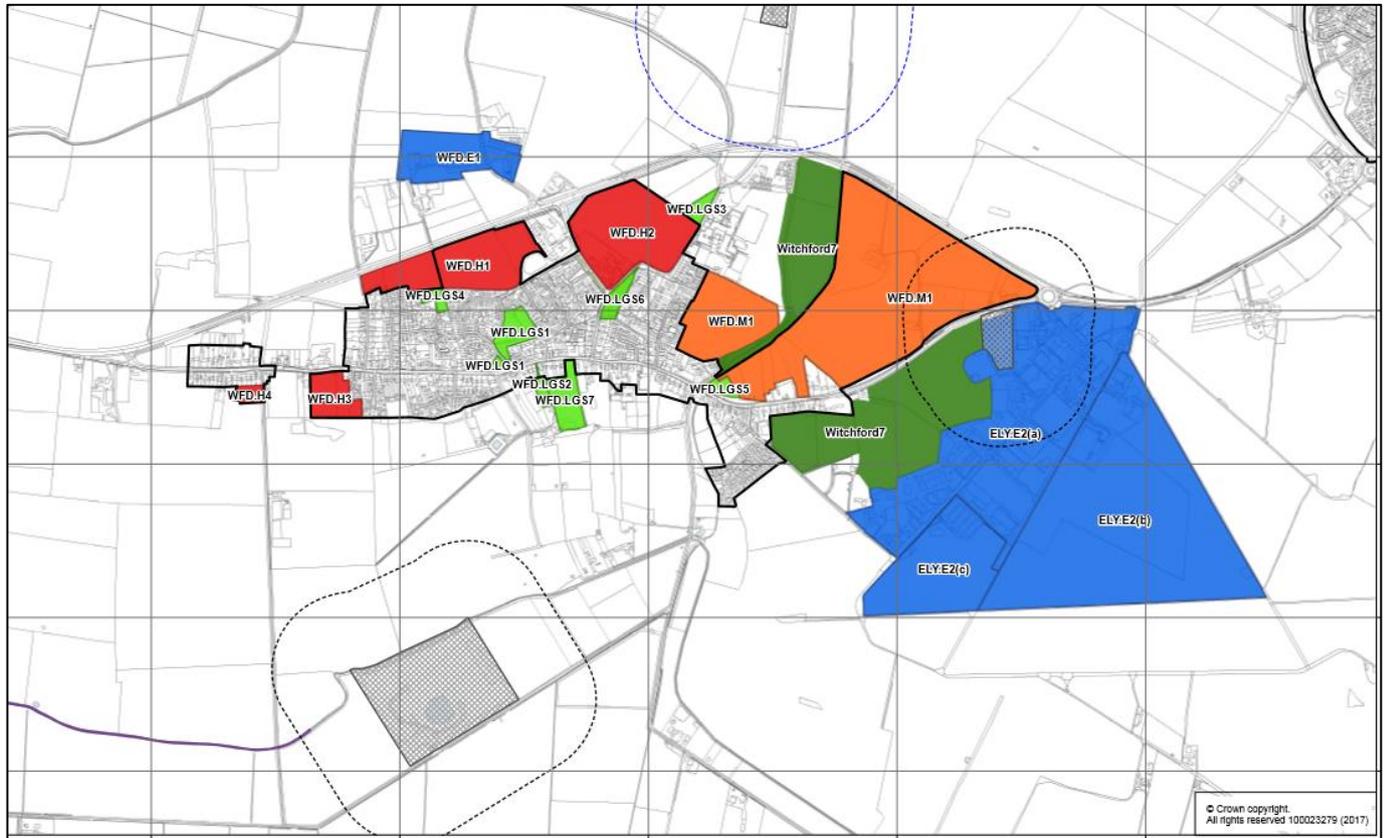
- Neither of the proposed Green Wedges serve a function of preventing the merging of settlements. This is acknowledged in the Evidence Base under PE22 – Green Wedge Evidence Report (November 2017). The northern Green Wedge is an isolated, generally thin, stretch of land with countryside either side of it. It performs no strategic function in itself which would prevent coalescence between Witchford and Ely, which is distant to the east.
- The southern Green Wedge includes land between Witchford and Lancaster Way Business Park. It also performs no function in preventing the coalescence of Witchford and Ely. It is outside the settlement envelope where normal and restrictive countryside policies apply. Should there be an objective to keep Lancaster Way and Witchford separate standard countryside policy objectives would be sufficient. This has been the case historically and there is no reason to conclude that would change in the future. In addition, the setting and local character of Witchford would also continue to be maintained by normal countryside protection policies. It's therefore not necessary for a Green Wedge to be applied to meet this purpose when existing open countryside policies have performed the same role successfully over many years.
- The second stated purpose is to guide development as settlements grow and to ensure that open space is incorporated within them is clearly not relevant to any of the development proposals taken forward in Witchford. The Green Wedges proposed are distant from the remaining Witchford housing allocations. They are private land with access only via a well enclosed right of way through the western edge of the northern green wedge. PE22 demonstrates there has been very little development pressure on either parcel, with no planning applications received for development on the northern parcel in the past 5 years and just 1 application for minor residential development which was refused on the southern parcel in the past 5 years. The designation proposed therefore does not meet this purpose following the Council's change in approach to the allocation of the surrounding land and development pressure is not a reason that is justified by the evidence. We therefore strongly disagree with the Council's conclusions in this respect in PE22.
- The third purpose of creating a green lung is not justified for either site. The northern parcel already contains a right of way but only through the western edge of the site. Therefore, the designation of the adjacent private land provides no additional community benefit. The southern green wedge has no public access beyond a recreational area in the far western side of the parcel which, with an adjacent parcel, is well contained and completely separate from the much more extensive tract of land to the east. In summary, if the intention was to identify land that would enable the creation of new linkages between the settlement and open countryside there is no justification for the designation of either site.
- The final purpose relates to the provision of a recreation resource close to where people live. Neither of the Green Wedges will perform this function beyond the existing right of way already mentioned and a small element of the southern parcel, with the rest, and by far the majority of the land, having no public right of access at all. There is no (other) public access to either parcel and there is no evidence to suggest that the existing right of way is in anyway under threat of diversion or extinguishment, and which therefore needs some additional layer of protection. In relation to the southern Green Wedge, it should not be the case that a criteria is used to justify a geographically broad designation, when it only relates to a very small, and physically separate element of a much more extensive tract of land. We therefore disagree strongly with the conclusions in PE22.

- 2.8 There is no national policy guidance on the designation of Green Wedges. The sites do not hold any special landscape value and by the far the majority of the land identified has very limited recreation or ecological value being in general in agricultural use. The designation of the sites as Green Wedge would not confer any additional community or wider planning benefit beyond that which is already established. In this case the designation of the land as Green Wedge therefore provides no additional contribution to supporting the sustainable needs of the local community or wider district and therefore does not find support in the NPPF. The proposals are not therefore justified based on the evidence available, and the land identified would not be effective in applying the stated purpose of policy Witchford6.

Local Green Space and Green Wedges

- 2.9 The Council has made a policy distinction between Green Wedge and Local Green Space designations, for which a number of small sites are proposed in Witchford. The land proposed as Green Wedge would not satisfy the requirements of a Local Green Space designation, which is set out in paragraph 100 in the NPPF. Taken as a whole they are not demonstrably special to the local community for any aesthetic, recreation or ecological value, and are not local in character, but are instead extensive tracts of land. There is therefore a clear difference between the two different types of designations and the land and circumstances in which they should apply.

Appendix 1: Local Plan Proposals Map (Submission draft 2017)



Deloitte.

Real Estate

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