



East Cambridgeshire
District Council

East Cambridgeshire Local Plan

Matter 7– Promoting Healthy Communities, Design, Natural Environment and Green Infrastructure

East Cambridgeshire District Council

Hearing Statement

September 2018

Matter 7: Promoting Healthy Communities, Design, Natural Environment and Green Infrastructure

Issue 1: Whether the Local Plan is justified, effective and consistent with national policy in relation to its approach towards promoting healthy communities, requiring good design and enhancing and conserving the natural environment?

15. What are the implications of the revised Habitats Regulations Assessment (CD13A) on the detailed wording of Policy LP20, LP30 and other consequential potential amendments to the Plan?

The implications of the revised Habitats Regulations Assessment (CD13A) for the detailed wording of policies in the Local Plan were set out in the Schedule of ECDC Suggested Modifications, 8 June 2018 (document ED13). Suggested modifications, as a consequence of the revised HRA, were made for policies LP21, LP30, Ely3, Iselham4, Littleport3, Littleport4, Littleport5, Littleport6 and Littleport7.

These suggested modifications are based on the recommendations of the revised HRA and as agreed via an Interim Statement of Common Ground (SOCG) between East Cambridgeshire District Council and Natural England (see ECDC Matter 1 hearing statement). Paragraph 3.8 of the SOCG states that an updated SOCG will be prepared within 6 weeks of the updated HRA work concluding, however, the Council can confirm that the revised HRA has not resulted in the need to change the suggested modifications in ED13 and, consequently, a revised SOCG will not be required.

No further modifications arising from the HRA work are being suggested at this 'stage 2' hearing.

16. Are Policies LP20 and LP30 flexible, justified, and worded in such a manner as to be effective? What impact will it have on the viability of developments, and is it consistent with national policy?

Taking each question in turn:

Are Policies LP20 and LP30 flexible, justified, and worded in such a manner as to be effective?

Yes the Council considers that both policy LP20 and LP30 are flexible, justified and worded in such a manner as to be effective.

Taking each policy in turn, the background to the development of Policy LP20 is primarily contained within evidence report PS.EVR 20 Delivering Green Infrastructure, Trees and Woodland. Evidence base documents PE20 Cambridgeshire Biodiversity Action Plan and PE21 Cambridgeshire Green Infrastructure Strategy are also particularly relevant to this policy. The policy evidence report demonstrates that this policy is the most appropriate strategy when considered against the reasonable alternatives (as set out in the evidence reports and appraised through the SA (CD11A)) and is based on robust and credible evidence.

The policy is deliverable: the criteria set out in the policy is reasonable, realistic and measureable. In their representations (PS652) on the Proposed Submission Local Plan, Natural England (982994) consider the policy meets the tests of soundness.

The background to the development of Policy LP30 is primarily contained within evidence report PS.EVR 30 Conserving and Enhancing Biodiversity and Geodiversity. Evidence base documents PE20 Cambridgeshire Biodiversity Action Plan and PE21 Cambridgeshire Green Infrastructure Strategy are also particularly relevant to this policy. The policy evidence report demonstrates that this policy is the most appropriate strategy when considered against the reasonable alternatives (as set out in the evidence reports and appraised through the SA (CD11A)) and is based on robust and credible evidence.

The policy is deliverable: the criteria set out in the policy is considered to be reasonable, realistic and measureable. However, some representors have put forward some suggested minor amendments to the policy wording which are considered below.

In their representations (PS693) on the Proposed Submission Local Plan, Natural England (982994) consider the policy meets the tests of soundness. They request a minor amendment to LP30, under bullet point i of section 1 Designated Sites, 1a) International Sites, which the Council are happy to suggest as a proposed modification as follows:

- i. Access and visitor management measures within the SAC **European site**;

In their representations (PS120), the Wildlife Trust (979608) also suggest some minor amendments to the wording of LP30, which are factual changes to better reflect the local habitats to be found in East Cambridgeshire and the local approach to biodiversity conservation. The Council is happy to suggest a further proposed modifications to LP30, to reflect the comments of the Wildlife Trust, as follows:

- a. aid the management, protection, enhancement and creation of priority habitats, including **fens, calcareous limestone** grasslands, woodlands and hedgerows, wet woodlands, rivers and flood**plain grazing marsh** meadows;

and, under 1c) Local Sites:

Development likely to have an adverse effect on locally designated sites, their features or their function as part of the ecological network, including County Wildlife Sites, Local Geological Sites and sites supporting ~~Biodiversity Action Plan habitats and species~~ **priority habitats and species, as listed by the local biodiversity partnership**, will only be permitted where the need and benefits of the development clearly outweigh the loss and the coherence of the local ecological network is maintained.

What impact will it have on the viability of developments, and is it consistent with national policy?

Policy LP20 relates to all development, as it is considered that both residential and non-residential development, and at every scale, from individual buildings to strategic development sites, has the potential to make an important contribution to providing, enhancing and/or managing green infrastructure. In terms of viability, the wording of policy LP20 is considered to be sufficiently clear that the expectation on developers will be contributions to green infrastructure provision that are appropriate and proportionate to the scale of the development

proposed. Similarly, the policy requires new development to explore opportunities for new tree planting “where appropriate and practical”. However, as advised by the NPPG at paragraph 032 (Reference ID: 8-032-2160211) what is expected in terms of securing and funding green infrastructure will need to be assessed on a case by case basis taking into account individual circumstances. The Council’s Developer Contributions SPD (2013)¹ (which is scheduled to be updated post adoption of the Local Plan) sets out additional guidance.

Similarly, criteria o) of policy LP30 (under Biodiversity and Geodiversity in Development) seeks all development proposals to deliver a net gain in biodiversity proportionate to the scale of development proposed.

Both policy LP20 and LP30 have been tested as part of the whole plan viability assessment (see PE16 Viability Appraisal Final Report).

The Council considers that both policies are in accordance with national policy, and in particular paragraphs 113 and 114 of the NPPF, which require local planning authorities to set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure and to set out criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Policy evidence reports PS.EVR 20 and PS.EVR30 contain further information under the heading ‘national policy’.

¹ https://www.eastcambs.gov.uk/sites/default/files/SPD%20Developer%20Contributions%20-%20Adopted%20Version_0.pdf

17. Is policy LP21 positively prepared, justified, effective and consistent with national policy? In particular, are the standards referred to in Appendix A justified by up-to-date evidence and is it clear how the policy will be implemented.

The Council believes policy LP21 has been positively prepared, is justified, effective and consistent with national policy.

The background to the development of Policy LP21 is primarily contained within evidence report PS.EVR 21 Open Space, Sport and Recreational Facilities. The policy evidence report demonstrates that this policy is the most appropriate strategy when considered against the reasonable alternatives (as set out in the evidence reports and appraised through the SA (CD11A)) and is based on robust and credible evidence.

The policy is consistent with national policy, and in particular paragraphs 73 and 74, which require local plan policies to be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision, and which protect existing open space, sport and recreation facilities from development, unless certain tests can be met. Policy evidence report PS.EVR 21 contains further information under the heading 'national policy'.

The main evidence base documents that inform and help to justify the inclusion of the standards as set out in Appendix A are: PE25 Indoor Sports Facilities Needs Assessment and PE26 Play Facilities Audit. These documents are consistent with paragraph 73 of the NPPF.

Policy LP21 has been tested as part of the whole plan viability assessment (see PE16 Viability Appraisal Final Report).

How the open space standards set out in Appendix A will be applied is set out in the Council's Developer Contributions SPD (2013), page 17 to 19, (but which is scheduled to be updated post adoption of the Local Plan).

The importance of this policy is not only about creating sustainable places where people want to live, and live healthy lives, but is underlined by the previous discussions relating to the HRA. That discussion (and associated evidence, such as the Appropriate Assessment) confirmed that it is essential that the additional recreational pressure arising from growth is mitigated by new and improved recreational provision as part of new development. If policy LP21 was removed, or 'watered down' in any way, it could fundamentally undermine the ability of the plan to pass its Habitat Regulations obligations. In that regard, it is pleasing to see Natural England has no objections to the policy – indeed they are supportive of it (PS655).

However, as a 'tidying up' exercise, the council intends, as an 'additional modification' to delete the final column in the two tables of Appendix A, as well as the final row of the table in Part A. Such text was only included to assist the reader as the consultation stage, and is not considered necessary to include on adoption and has the potential to become quickly dated. If the Inspector considers such deletion to be a 'main modification' then the Council would be happy for the Inspector to do so.

18. Are the locally derived parking standards contained within Appendix B of the Local Plan effective, justified and suitably flexible?

Yes the locally derived parking standards contained within Appendix B are considered to be effective, justified and suitably flexible. As stated in Appendix B, the standards are carried forward from the adopted Local Plan (2015) where they were found sound.

However, the 'additional guidance' at the end of Appendix B is new, and the Council notes a number of representations objecting to them (rather than, on the whole, the main set of standards in the tables).

The purpose of the 'additional guidance' is to give greater clarity to decision takers as to how to apply the standards. Planning Committee in particular has spent considerable time in the past debating whether the standards have been met in a particular case, or appropriately met. For example, concern has been expressed that whilst technically the standards may have been met for a particular scheme, it was done so through a design which, in practical terms, would never result in sufficient parking spaces being useable by the occupiers (due to, for example, spaces being tandem; garages highly unlikely to be used for parking, etc). National government research has shown, for example, that only 40% of garages are used for parking cars². Consequently, despite standards being technically met, cars were being parked on the road, which often can result in poor urban design, safety issues and access problems for other road users.

Thus, the additional guidance has been brought in, and they are a key part of Councillors aspirations for this new Plan.

However, reflecting the concerns raised by objectors, the Council would not be averse to the following modifications being made to the 'additional guidance':

Additional Guidance for Dwellings

In addition to the numerical parking standards for dwellings, the following matters also apply:

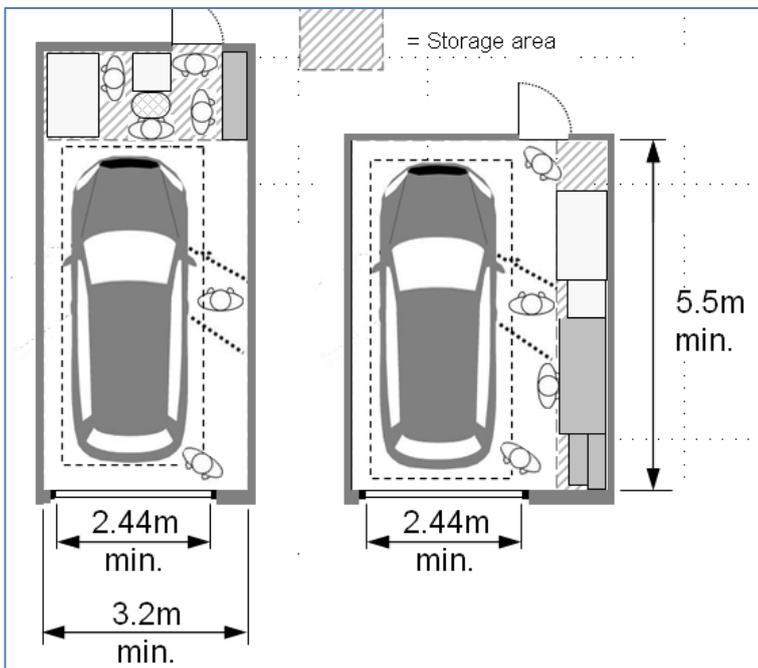
- Single garages ~~of any size~~ do not count as a parking space **unless they meet all of the following minimums:**
 - **internal area of 22sqm;**
 - **width of 3.2m; and**
 - **length of 5.5m;**
- Double garages count as one parking space;
- Car ports do not count if the car port has doors/gates **unless it meets the above minimum sizes for a garage. If it has no doors/gates, and if it is to count as a space, it must be clearly sufficient,** ~~or is clearly insufficient~~ in size to accommodate a car (including access to and around a parked car within it);
- Parking spaces should ideally be on-plot **(though see final criterion below)**, with two spaces directly accessible on to the highway (i.e. avoid tandem end-to-end parking, or other scenarios whereby one space 'blocks' the exit and entry to the highway for another space). **For the avoidance of doubt, this criterion only applies to the first two spaces required;**
- On-plot spaces should ensure sufficient room for access to and around the parked car, including by bicycle. This means spaces should be around 6.5m x 4.1m (where bicycle access is also required over this space) or 6.0m x 3.6m (where bicycle access is not required);
- Parking courts can count towards the parking standards (and may be the best design solution in some circumstances), but only the first 12 spaces which the court provides will count. Such

² Source: Bedford Borough Council – Parking Standards for Sustainable Communities 2014

courts must be in close proximity to the dwellings which it serves, be an attractive option to use, with clear surveillance. Parking courts to the rear of dwellings are unlikely to meet this criterion;

- For flats/apartment schemes, the above 12 space limit is relaxed;
- Parking spaces on the highway **can count towards the required spaces but** must be clearly delineated and not impede the flow of traffic. More generally, highway design should ensure landscaping areas/ footpaths/ cycle ways/ etc adjacent to highways do not become informal and unattractive parking areas. This will require careful use of kerbs, bollards and/or tree planting.

The 22sqm insertion is considered suitable sufficient to enable a reasonable prospect for the garage to be used for parking, as the following illustration identifies:



Examples of garages with minimum internal floor area of 22m² showing notional 2.2m x 5m car space with clearance to walls and doors with additional storage space

Source: Bedford Borough Council – Parking Standards for Sustainable Communities 2014

Objectors have stated that the fifth criterion is excessive. However, this diagram illustrates it not to be the case:

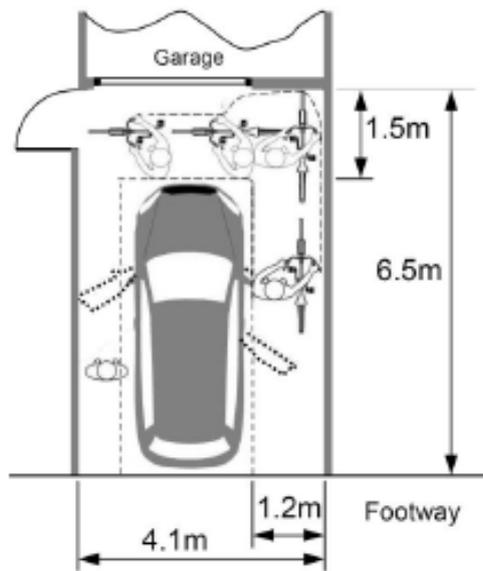


Figure 6
A car parking space on a driveway in front of a garage or cycle parking facility must provide full pedestrian access to the car and pedestrian and cycle access to the rear of the site.

Dimensions shown are minimums

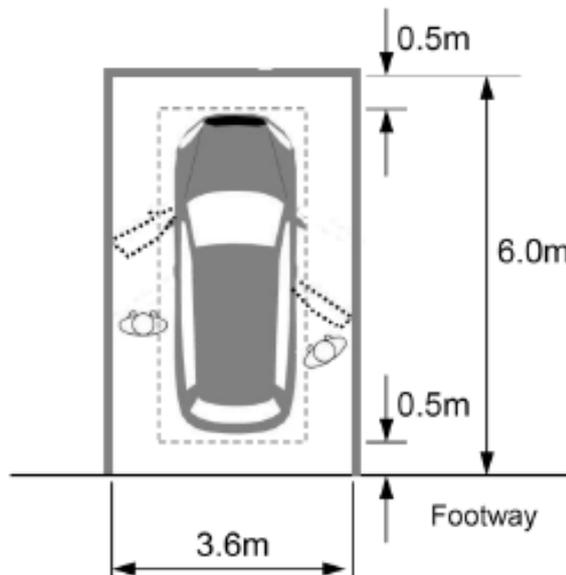


Figure 7
Minimum dimensions of single drive or car port without pedestrian and cycle access to rear.

An extra 0.5m in length is provided to ensure clearance from a public footpath or/and highway where the far end of the car space is immediately adjacent to a vertical boundary feature,

A parking space located between walls should include additional width to allow adequate space for the doors of the vehicle to be opened and for access down the side of the parked vehicle.

Source: Bedford Borough Council – Parking Standards for Sustainable Communities 2014

Finally, to ensure the standards are effective, it has been questioned whether “m²” is the appropriate way to express ‘square metres’ in the standards. For example, 100m² could be interpreted to mean an area with a length of 100m and width of 100m, or it could mean 100 square metres (i.e. an area with a length and width equivalent to 10mx10m or 5mx20m etc).

Whilst the Council believes the standards would, by a reasonable person, be read to mean ‘square metres’, it is probably best to modify all references to m² with sqm.

Thus, the first line of the standards would refer to “14 sqm” and 25 sqm”.

The Council are suggesting this as a 'main modification'. If the Inspector does not consider this amendment to be sufficiently going to the heart of the soundness of the plan, the Council will make this amendment as an 'additional modification'.

19. Is the wording of Policy LP22 effective and consistent with national policy? How does it relate to the individual settlement specific 'Local Character / and Facilities' Policy? Is the wording of these policies effective, justified and consistent with national policy? Is there duplication between these and policy LP22 and will this lead to a lack of clarity in determining applications?

Taking the first question:

Is the wording of Policy LP22 effective and consistent with national policy?

The background to the development of Policy LP22 is contained within evidence report PS.EVR 22 Achieving Design Excellence.

The policy is deliverable: the criteria set out are reasonable, realistic and measurable. Furthermore, they are necessary to ensure new development is sustainable, and does not have a negative impact on local character, appearance and quality of the area. The policy is sufficiently flexible, as it requires new development to address criteria i to xii "where appropriate".

The Council believes that the wording of Policy LP22 is consistent with national policy, particularly paragraphs 58, 60, 61 and 64 and the NPPG. Policy evidence report PS.EVR 22 contains further information under the heading 'national policy'.

How does it relate to the individual settlement specific 'Local Character / and Facilities' Policy? Is the wording of these policies effective, justified and consistent with national policy? Is there duplication between these and policy LP22 and will this lead to a lack of clarity in determining applications?

The background to the development of the individual settlement specific 'Local Character and Facilities' policies in the Local Plan is contained within the PS.EVR Evidence Reports for each settlement, document library reference EVR02. The wording of each of these policies is considered to be effective, justified and consistent with national policy. The policy evidence reports for each settlement contain further information under the heading 'national policy'.

The Council does not consider that there is duplication between the settlement specific 'Local Character and Facilities' policies in the Plan and policy LP22. Policy LP22 is the overarching design policy that all development proposals coming forward will be considered against. The 'Local Character and Facilities' policies are different in that they seek to identify and maintain the specific elements that contribute to a settlement's individual character and local distinctiveness. For example, policy Coveney1 seeks to protect the views from the village's elevated position as these contribute to the 'isle' feel of the village. For Isleham, policy Isleham1 requires new development to respect the traditional building materials of clunch and pebble used in the village, as these make an important contribution to local character and distinctiveness in this particular settlement.

The Local Plan should be read as a whole and the individual policies should not be considered in isolation from each other. Therefore, for a development coming forward in a settlement in the Policies for Places chapter of the Local Plan, both policy LP22 and the settlement's Local Character and Facilities policy will be relevant. Furthermore, the wording of the Local Character

and Facilities policies' are consistent with policy LP22, and therefore there will be no lack of clarity in determining applications.

Finally, for context, it is worth noting that the 2015 Local Plan had similar wording to the 'Local Character and Facilities' Policy in each settlement chapter, but such wording was not included in a policy. Consequently, decision takers (such as appeal Inspectors) are giving it no weight. The Council has been firm in its intention to correct that 'technical' error, because such text in the 2015 Local Plan was always intended to have been used by decision takers, but unfortunately hasn't.

20. Is a voluntary approach to the provision of Health Impact Assessments consistent with creating healthy, inclusive communities?

The background to the development of Policy LP22 is contained within evidence report PS.EVR 22 Achieving Design Excellence.

The Council considers the voluntary approach to the requirement for Health Impact Assessments as set out in policy LP22 to be entirely consistent with national policy and, in particular, the guidance set out in the NPPG at paragraph: 004 Reference ID: 53-004-20140306, which states: "A health impact assessment **may** be a useful tool to use where there are expected to be significant impacts" (Council's emphasis added). The voluntary approach allows the policy to be applied flexibly on a case by case basis and ensures the requirement for HIA is not too onerous or resource intensive for both applicants and decision makers, which is consistent with paragraph 173 of the framework.

21. Would the requirement to seek developer contributions towards improved or new health facilities, or other facilities or resources, such as green infrastructure result in 'double dipping'? Is the approach consistent with CIL Regulations in relation to the provision of financial or other contributions in kind?

The Council is confident that no 'double-dipping' will take place and that developers will not be charged twice for the same infrastructure, in line with CIL Regulations.

The Council's latest R123 list (ED020) does presently list two specific health facilities, and clearly developer contributions (via s106) would not be sought towards those two facilities. However, other health related facilities (or contributions towards) may well be needed for some development schemes, and criteria (z) is carefully worded to enable that to happen without contravening CIL Regulations.

As for 'green infrastructure' the R123 List contains no such reference to green infrastructure, other than arguably the Burwell Recreational Ground Project. Again, care would be needed by decision takers to ensure no double dipping in respect of seeking any s106 for that particular project.

22. Is the wording of Policy LP26 effective, and is the policy justified by technical evidence and consistent with national policy with particular reference to the use of mechanical ventilation?

The background to the development of Policy LP26 is contained within evidence report PS.EVR 26 Pollution and Land Contamination.

The policy is consistent with paragraph 17 of the NPPF, which advises that the planning system should “always seek to secure...a good standard of amenity for all existing and future occupants of land and buildings”, and with paragraph 109, which states “*planning policies...should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account*”.

The policy is effective as it is clear how a decision maker should respond to a development proposal. In relation to mechanical ventilation, whilst applications will be considered on a case by case basis, the use of mechanical ventilation as a mitigation measure is considered by the Council to be a ‘last resort’ solution, due to the potential impact of such a measure on the standard of living for future residents, as well as the environmental (carbon) cost of such measures and the ongoing maintenance burden to future occupiers. The avoidance of mechanical ventilation, and the need for policy clarification, can be emphasised by a recent appeal decision in the district (Appeal Ref: APP/V0510/W/17/3178635) whereby the Inspector considered such ventilation would “not provide a suitable standard of living accommodation and would provide an unsatisfactory form of development”.

The Environment Agency (1145912, PS584) and Natural England (982994, PS692) both consider policy LP26 to be sound.

23. Is it appropriate to refer within a policy to documents which are not statutory planning documents, such as Supplementary Planning Documents?

Please see Matter 5, Q8, response.

24. Is the designation of Local Green Spaces, as set out below, justified by evidence, effective and consistent with national policy? The designation of an area of land as Local Green Space confers significant protection. Is the Council satisfied in each case below that the proposed allocation can be justified? Please set out in detail, why this is considered to be the case and draw on any relevant representations.

Taking each question in turn:

Is the designation of Local Green Spaces, as set out below, justified by evidence, effective and consistent with national policy?

The methodology and rationale for the designation of Local Green Spaces on the Policies Map is clearly set out in the evidence report PS.EVR 29 Conserving Local Green Spaces and evidence report PE15 Local Green Space Assessment.

The designation of Local Green Spaces is based on a robust and up to date assessment of each site put forward for consideration, published in PE15. Their designation is therefore considered to be fully justified by evidence.

The designation of Local Green Space is consistent paragraphs 76 and 77 of the NPPF and the guidance set out in the NPPG. Each site designated on the Policies Map (and all other candidate sites that were rejected) were assessed against the tests set out in paragraph 77 and only sites that met these tests are designated on the Policies Map as Local Green Space. The evidence which demonstrates that this assessment has taken place is contained within evidence report PE15 Local Green Space Assessment. Table 1 and the following supporting text, (pages 5 to 8) of PE15 explain how the criteria in paragraph 77 has been interpreted and applied in East Cambridgeshire. Table 2, page 10 onwards sets out the assessment of each site against the NPPF criteria.

The designation of an area of land as Local Green Space confers significant protection. Is the Council satisfied in each case below that the proposed allocation can be justified? Please set out in detail, why this is considered to be the case and draw on any relevant representations.

The Council is confident that each Local Green Space designation in the Local Plan is fully justified. As discussed above, the evidence to support each designation is set out in evidence report PE15 Local Green Space Assessment, which assesses each site against the against NPPF criteria.

Paragraph 78 of the NPPF is clear that Local Green Spaces have the same status as Green Belts and that development should be managed in accordance with the guidance on the types of buildings and development that may be exceptionally permitted in Green Belts as set out in paragraphs 89 and 90 of the framework.

As far as the Council is aware, only two of the designations have a specific outstanding objection, this being Anglian Water's (982580) representations (PS262) in relation to policy LP29 and specifically site REA.LGS1 (LGS/21/01 in PE15) on Inset Map 31 Reach and, Abbey Properties Cambridge's (1068772) representations (PS548) in relation to policy Witchford3 and specifically site WFD.LGS7 (LGS/34/15 in PE15) on Inset Map 49.

Taken as a whole, the Council thinks REA.LGS1 is suitably allocated as a LGS. Removing the WRC element of it would leave an unusual 'hole' in the middle, and indeed a key part of the character of this LGS is the water environment. Nevertheless, rather than amending the LGS designation so as to exclude the WRC, the Council would be content to include the following wording in Policy Reach3, final column:

“See Policy LP29, though, in principle, development proposals which relate to, and are necessary for, the continued operation of Reach Water Recycling Centre will exceptionally be permitted.”

However, as the Statement of Common Ground with Anglian Water confirms, AW remains unsatisfied by this response.

The Council is therefore content for the Inspector to determine the most appropriate course of action (with the Council's preference in the order as presented below):

- (a) Retain the LGS as submitted
- (b) Retain the LGS as submitted, but add the above suggested modification
- (c) Amend, so as to remove the WRC element
- (d) Delete the LGS in its entirety

Turning to the second site, the Council considers WFD.LGS7 is suitably justified by the evidence as set out in the evidence report PE15 Local Green Space Assessment.

The objector to the allocation of the site as LGS suggests that site WFD.LGS7 and WFD.LGS2 are connected and therefore are effectively one allocation that results in a blanket designation of open countryside. However, the two sites are distinctive open spaces with clearly defined boundaries. National policy and guidance does not set a size limit for a LGS. The Council considers WFD.LGS.7 is local in character and not extensive. It is well connected to the local community it serves, being immediately adjacent to the built up area of the village, centrally located and clearly visible from Main Street.

The objector also contends that the site does not meet the necessary demonstrably special criteria for designation of a site as LGS as set out in para 77 of the NPPF. Pages 5 to 6 of PE15 sets out this criteria and pages 6 to 7, paras 2.12 – 2.17 sets out further explanation as to how the criteria has been interpreted and applied in East Cambridgeshire. The Council believes WFD.LGS7 meets the demonstrably special criteria and holds a particular local significance because of its beauty and recreational value. The site provides a significant open break in the street scene along Main Street, therefore contributing to the physical form and layout of the village. The site offers clear, long views of open countryside beyond the village to the south. These views hold particular local significance in terms of their contribution to the character of the village, providing a visual link to the surrounding rural landscape.

In terms of recreational value, the site offers informal recreational opportunities via a Public Right of Way (part of a popular village circular walk) that then connects to other open spaces and the open countryside. The objector quotes NPPG guidance stating that there is no need to designate linear corridors as Local Green Space to protect rights of way which are already protected under other legislation. However, the first line of that NPPG guidance states; “Areas that may be considered for designation as Local Green Space may be crossed by public rights

of way” (para 018 Reference ID: 37-018-20140306). WFD.LGS7 covers such an area and not a linear corridor as implied.

25. Is the designation of land as a Green Wedge, and the related policy Witchford 6: Green Wedges, justified and consistent with national policy? What is the difference between a Green Wedge and a Local Green Space?

Taking each question in turn:

Is the designation of land as a Green Wedge, and the related policy Witchford 6: Green Wedges, justified and consistent with national policy?

Yes the Council believes the designation of land as Green Wedge and the related policy Witchford 6 is justified and consistent with national policy.

The Green Wedge Study (PE22) clearly sets out the process that was followed to inform the identification of the Green Wedges shown on the Policies Map and document PS.EVR.WFD provides justification for the inclusion of specific policies relating to Witchford, including Witchford 6.

The Green Wedges designated in the East Cambridgeshire Local Plan are based on a robust assessment of whether they meet the criteria for designation as Green Wedges and only include land that is strictly necessary to fulfil the purpose of policy Witchford 6.

Whilst the NPPF and accompanying NPPG do not specifically recognise Green Wedges as a national policy designation, they do not rule out that locally valued landscapes may be identified and protected through a Local Plan as a local designation. Indeed, a number of recently adopted Local Plans include such a local designation.³ Green Wedges can contribute to the delivery of sustainable development, a core principle of the NPPF. Their designation is considered to be consistent with the following areas of national policy in particular:

- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities (para 73);
- Protecting and enhancing valued landscapes and recognising the wider benefits of ecosystem services (para 109);
- Planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (para 114);
- Local Plans should identify land where development would be inappropriate, for instance because of its environmental or historic significance and contain a clear strategy for enhancing the natural, built and historic environment (para 157).

What is the difference between a Green Wedge and a Local Green Space?

³ See, for example, Central Lincolnshire Local Plan, April 2017: <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan/>

The key difference between a Green Wedge and a Local Green Space is their size. Paragraph 77 of the NPPF states that the designation of Local Green Space should only be used “*where the green area concerned is local in character and is not an extensive tract of land*”.

This is not defined, but the NPPG provides some guidance. It states:

“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green space designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name”. (Paragraph: 015 Reference ID: 37-015-20140306)

There is therefore the expectation that Local Green Spaces are reasonably small, self-contained sites. In contrast, Green Wedge designations may be much larger and cover open countryside adjacent to settlements.

A further difference between a Green Wedge and a Local Green Space is the issue of permanence. The NPPF, at paragraph 76, states that Local Green Spaces “*should be capable of enduring beyond the end of the plan period*”. Whereas a Green Wedge can be reviewed as part of the Local Plan review process.

It is also worth noting that this is the first Green Wedge to be introduced to the Local Plan for East Cambridgeshire, and is somewhat of a trial initiative to be monitored in terms of its effectiveness and relevance. For a future review, the Council may introduce further Green Wedges (where appropriate to do so), or it may decide to delete the concept. Of all the ‘wedges’ in East Cambridgeshire, the area in the triangle between Witchford, Lancaster Way Business Park and Ely is the most obvious candidate area to explore and introduce this concept.