

RPS

Proposed Submission Local Plan Examination Hearing Statement

In respect of

East Cambridgeshire Proposed
Submission Local Plan
Examination – Matter 7

On behalf of

Abbey Properties Cambridgeshire
Limited & Peter and Michael
Seymour and Nicholas and Judith
Holdsworth

RPS Ref: JCG22793

04 September 2018

Secure & Stable
ADDING VALUE

QUALITY MANAGEMENT

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1.0 INTRODUCTION

- 1.1 We are instructed by our clients, Abbey Properties Cambridgeshire Limited & Peter and Michael Seymour and Nicholas and Judith Holdsworth, to submit a Hearing Statement and appear at the Examination Stage 2 Hearings on their behalf in relation to the East Cambridgeshire Proposed Submission Local Plan and associated evidence base.
- 1.2 RPS previously submitted representations on behalf of our clients to both the Local Plan Further Draft consultation in January 2017 and the Proposed Submission consultation in November 2017.
- 1.3 The representations to the Local Plan Further Draft raised objections to the proposed housing allocations within Witchford and a number of draft policies including the Settlement Hierarchy and the Countryside (Policy LP3), Achieving Design Excellence (Policy LP22) and Conserving and Enhancing Heritage Assets (Policy LP27).
- 1.4 The 2017 November representations to the Proposed Submission Local Plan raised further objections to the proposed allocation of housing sites within Witchford and a number of the draft policies including LP2, LP3, LP6, LP16, LP32, Witchford1, Witchford2, Witchford3 and the Sustainability Appraisal.
- 1.5 These representations are provided in the appendices to the Hearing Statement submitted in relation to Matter 5.
- 1.6 Section 2 of this Statement details our clients' responses to a number of the Inspector's Matters, Issues and Questions for discussion at the Stage 2 Examination Hearing Sessions. Statements to the Stage 1 Examination Hearing Sessions were submitted in May 2018.

2.0 RESPONSE TO THE INSPECTOR'S MATTERS, ISSUES, AND QUESTIONS FOR DISCUSSION AT THE EXAMINATION HEARINGS

2.1 The Inspector has posed a number of questions in respect of Matters for the Stage 2 Examination. This Hearing Statement seeks to respond to questions of relevance to our clients' interest in respect of Matter 7. These responses are provided below.

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?

Question 24

2.2 Question 24 asks whether the designation of Local Green Space is justified by evidence, effective and consistent with national policy. Additionally the Inspector seeks assurances from the Council that the proposed allocations can be justified.

2.3 We contend that the proposed Green Space Allocation WFD.LGS7 is not supported by evidence, justified, effective or consistent with national policy.

2.4 Paragraph 76 of the NPPF 2012 states that land identified as Local Green Space '*should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.*' Furthermore, Local Green Spaces should be capable of enduring beyond the end of the plan period.

2.5 Additionally Paragraph 77 states '*Local Green Space designation will not be appropriate for most green areas or open space*' rather the designation should only be used:

- '*Where the green space is in reasonably close proximity to the community it serves;*
- '*Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and*
- '*Where the green area concerned is local in character and is not an extensive tract of land.*'

2.6 We note that the criteria for assessing Local Green Space is retained within Paragraph 100 of the NPPF 2018.

2.7 We therefore consider that for a site to be considered as Local Green Space it should not unreasonably limit sustainable growth and development in the settlement to comply with NPPF Paragraph 76, and must meet all the criteria set out in Paragraph 77.

2.8 According to the East Cambridgeshire District Council Local Green Space Report November 2017 (PE15), Local Green Space Allocation WFD.LFS7 (Horse Meadow, Main Street) fulfils two (beauty and recreational value) of the five key Local Green Space criteria set out in the NPPF 2012. We agree with the Council's assessment that the site does not contain features of historic significance, and is neither rich in wildlife nor tranquil. However, we strongly disagree that the site demonstrates the qualities of beauty and recreational value necessary for it be allocated as Local Green Space.

2.9 Neither the NPPF nor the NPPG provide a definition of beauty for identifying Local Green Space. However, Table 1 of the Council's Local Green Space Report November 2017 states the following:

“enhances local character, adds to the setting of a building or groups of buildings”

2.10 Additionally we note that the Paragraph 2.13 expands this definition to include:

- The visual attractiveness of the site as a whole;
- The contribution the site makes to landscape or townscape character and local distinctiveness;
- The contribution the site makes to the physical form and layout of a settlement or neighbourhood.
- Whether the site offers long views through or beyond a settlement or neighbourhood or views of locally valued landmarks.

However, as set out below we contend that the inclusion of bullet points 3 and 4 are contrary to the criteria set out in the NPPF and long established legal principles.

2.11 Considering the contribution the site makes to the physical form and layout of a settlement is inconsistent with national policy. Paragraph 76 of the NPPF states the designation of Local Green Space should be consistent with *“local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services”*. However, the Council's criteria will result in the protection of a sustainable site for development and growth of the settlement. The designation is also unlikely to be capable to enduring beyond the plan period as these type of sites are suitable for sustainable growth in the future. Therefore, including a site's contribution to the physical form and layout of a settlement in justifying its allocation as Local Green Space is inconsistent with the NPPF.

2.12 In relation to whether a site offers long views through or beyond a settlement or neighbourhood or views of locally valued landmarks, we note that these views could only be temporary, seasonal or relate to part of the site. We contend it would be unsound and inconsistent with the NPPF to allocate a site as Local Green Space because of the view provided through or beyond a settlement should this view only be available at certain times of year. Additionally, it is a long established legal principle that a landowner cannot protect the view that they have from their land per se. Furthermore, allocating Local Green Space because of a view will only ever benefit those living directly opposite the Local Green Space.

- 2.13 Therefore, only the following criteria set out in the Council's Local Green Space Report November 2017 should be used as part of the definition of beauty:
- The visual attractiveness of the site as a whole;
 - The contribution the site makes to landscape or townscape character and local distinctiveness.
- 2.14 Draft Local Green Space allocation WFD.LFS7 demonstrates neither of these qualities. The site has no distinctive landscaping or features which could be considered to enhance the local character or add to the setting of existing buildings. It is incorrect to define the site as “a very attractive field”. Rather the site is plain and typical of many paddocks and agricultural fields located across East Cambridgeshire.
- 2.15 Additionally, other proposed Local Green Space allocations within Witchford such as Millennium Wood are not considered to meet the criteria of beauty according the East Cambridgeshire District Council Local Green Space Report. We contend that if a site such as Millennium Wood which is managed as a community woodland and covered by a management plan developed by local volunteers is not considered by the Council to correspond to the Council's criteria of beauty, a typical paddock and agricultural field also should not meet this criteria.
- 2.16 Furthermore we note that the Inspector in appeal decision 09/00025/REFAPP¹, referenced by the party promoting this site as LGS, did not attach any amenity value to the site itself. We also note that the appeal decision was determined prior to the publication of the 2012 NPPF which provides a more nuanced approach to the protection of the countryside. Therefore, we contend that the site does not make a contribution to landscape or townscape character and local distinctiveness such as to warrant a Local Green Space Allocation.
- 2.17 PE15 also considers that the site fulfils the criteria of Recreational Value. Table 1 of the report defines it thus:
- “play area, allotments, informal spaces in housing estates, sports and playing fields (not already covered by a designation)”*
- This is expanded by paragraph 2.15 which states that *“most open spaces will meet this criteria. In general, sites should offer a variety of recreational opportunities, formal or informal”*.
- 2.18 The expanded definition provided by paragraph 2.15 is not consistent with the NPPF. The Council acknowledges that *“most open spaces will meet this criteria”*. NPPF, paragraph 77, clearly states that *“Local Green Space designation will not be appropriate for most green areas or open space.”* The additional detail provided by paragraph 2.15 should therefore not be afforded any weight in assessing Local Green Space allocations.
- 2.19 As stated above the site is currently used a paddock and does not provide general access to members of the public for recreational activities. Public rights of way are located within the site. However, as stated in the NPPG *“there is no need to designate linear corridors as Local Green Space simply to protect rights of way which are already protected under other legislation”*

¹ An appeal dismissed for the construction of two detached four bed dwellings on the site in February 2010

(Paragraph: 018 Reference ID: 37-018-20140306). Therefore it is clear that the site does not meet the recreational value criterion.

- 2.20 Furthermore, we contend that the Horse Meadow, Main Street would comprise '*an extensive tract of land*'. The total area of the site comprises 1.7ha and is the largest proposed Local Green Space allocation within Witchford and the second largest proposed Local Green Space allocation within the Local Plan. However, as the proposed Local Green Space allocations of Millennium Wood and Horse Meadow, Main Street are connected they can effectively be considered as one allocation with a site area of 2.1ha. This is effectively a blanket designation of a considerable area of open countryside to the south of Witchford and contrary to the NPPF.
- 2.21 Additionally within Table 2 of the Local Green Spaces Evidence Report January 2017 (**Appendix 1**) Field West of West End, Witchford (LGS/34/11) was considered to be an extensive tract of land and therefore unsuitable to be Local Green Space. This site had a gross area of 1.83ha. The allocation of both Horse Meadow and Millennium Wood would result in a Local Green Space larger than 1.83ha which was concluded by Council to constitute an extensive tract of land.
- 2.22 Appendix 1 contains the same criteria for designating Local Green Space as the November 2017 report. However, the January 2017 report considers that Horse Meadow, Main Street (Field East of Millennium Wood, Main Street) did not meet the criteria for Local Green Space. The Report states that the Horse Meadow, Main Street '*does not fulfil criteria, currently no public access, and is in use as paddock*'.
- 2.23 We contend that no changes have been occurred to the site or the surrounding area between the January 2017 and November 2017 assessments. Therefore, we consider there is no logical reason why the assessment of the site and the conclusion reached should differ from the Council's original January 2017 conclusion. Furthermore, we note that Horse Meadow, Main Street is the only site within Witchford to have been reassessed between the January 2017 and November 2017. The other sites considered within Witchford have retained the conclusions of the original assessment further demonstrating that there have been no changes to the assessment criteria between the January and November assessments.
- 2.24 We would also like to highlight to the Inspector that our clients were not informed that their site was being reassessed as Local Green Space following the initial assessment in January 2017. We consider that the Council should have notified our clients about proposals to designate their land as required by the NPPG (Paragraph 019 Ref ID 37-019-20140306). We therefore consider East Cambridgeshire Council has not complied with best practice.

3.0 CONCLUSION

- 3.1 On behalf of our clients, we have a number of concerns in relation to the soundness of the draft submission version of the East Cambridgeshire Local Plan. This Hearing Statement has been produced in response to Matter 7: Question 24.
- 3.2 We consider that the designation of Local Green Spaces is not justified, effective or consistent with national policy. Therefore the draft submission plan is currently not sound in this regard. For the Plan to become sound we consider that the following changes are required:
- The criteria used to assess Local Green Space is amended to be consistent with national policy;
 - Within the assessment of beauty the contribution a site makes to the physical form and layout of a settlement or neighbourhood, and whether it offers long views through or beyond a settlement or neighbourhood or views of locally valued landmarks, should be removed from the assessment criteria;
 - Within recreational value the consideration that most open space will provide recreational value should be removed;
 - Horse Meadow, Main Street should be removed as Local Green Space Allocation and the original January 2017 conclusions that the site does not meet the assessment criteria for Local Green Space reinstated.

**APPENDIX 1 - EAST CAMBRIDGESHIRE DISTRICT COUNCIL
LOCAL GREEN SPACES EVIDENCE REPORT JANUARY 2017**



EAST CAMBRIDGESHIRE
DISTRICT COUNCIL

East Cambridgeshire District Council

Local Green Spaces Evidence Report

January 2017

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1. Introduction

- 1.1. This document has been prepared to provide the methodology and rationale for the selection of preferred sites for Local Green Space (LGS) designation in the East Cambridgeshire Further Draft Local Plan (January 2017).

What are Local Green Spaces?

- 1.2. 'Local Green Space' (LGS) is a new national designation that has been introduced by the Government through the National Planning Policy Framework (NPPF¹). Local communities have the opportunity through the development of the Local Plan and Neighbourhood Plans to identify green areas for special protection that are particularly important to them.
- 1.3. The NPPF is clear that LGS designation will not be appropriate for most green areas or open space. Principally, they must be locally special and unique in the benefits that they provide to local communities. The NPPF sets out the criteria for designating LGS sites, and these are discussed in Section 2, Methodology.

Suggested Local Green Spaces

- 1.4. In February and March 2016 the council consulted on the Preliminary Draft Local Plan which set out the Council's emerging vision, objectives and planning policies for the growth and regeneration of East Cambridgeshire to 2036. As part of the consultation the Council invited residents, parish councils and other stakeholders to suggest sites they wish to be considered for designation as LGS.
- 1.5. Section 4 lists all potential LGS suggested to the Council as part of the Local Plan consultation. A total of 44 sites were considered, across 11 parishes.
- 1.6. The Council has assessed all suggested LGSs using the methodology in section 2. This evidence report sits alongside the Further Draft Local Plan and includes all of the sites suggested to us, and a reason and justification for the proposed designation, or not, of each site.

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

2. Methodology

National policy context

- 2.1. The National Planning Policy Framework (NPPF) was published in March 2012 and the National Planning Practice Guidance (NPPG) was introduced in 2014 which offers ‘live’ government guidance.
- 2.2. The NPPF introduced the new LGS designation. NPPF (Para. 76) indicates that, through local and neighbourhood plans, local communities, can identify green areas of particular importance to them for special protection. By designating land as LGS local communities will be able to rule out new development other than in very special circumstances.
- 2.3. The NPPF (Para. 78) requires local policy for managing development within a LGS should be consistent with Policy for Green Belts.
- 2.4. Due to the important status LGS designation holds, the NPPF (Para. 77) suggests LGS designation will not be appropriate for most green areas or open spaces. The designation should only be used:
 - Where the green space is in reasonably close proximity to the community it serves;
 - Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife; and
 - Where the green area concerned is local in character and not an extensive tract of land.
- 2.5. Further national guidance on LGS is provided in the National Planning Practice Guidance².

Site Submissions

- 2.6. In February and March 2016 the Council consulted on the Preliminary Draft Local Plan³ which set out the Council’s emerging vision, objectives and planning policies for the growth and regeneration of East Cambridgeshire to 2036. As part of the consultation the Council invited residents, parish councils and other bodies to suggest sites they wish to be considered for designation as LGS.
- 2.7. Promoters of suggested LGS sites were encouraged to complete “*Form D – Suggested Local Green Space*”, with all sites suggested needing to be accompanied by a map and supporting information setting out how the promoter believed the space meets the criteria for LGS designation. This ensured the Council was able to gather specific information about each site to enable the site to be assessed. For reference, a blank copy of the Form is at Appendix A of this report.
- 2.8. A total of 44 sites proposed for Local Green Space designation were considered.

Site Assessment

- 2.9. Sites submitted for consideration as LGSs have been assessed by Officers in the Strategic Planning Team on a site by site basis. Each submitted site has been plotted on the Council’s GIS

² <http://planningguidance.planningportal.gov.uk/>

³ <http://www.eastcambs.gov.uk/local-development-framework/local-plan-review>

database and assigned a unique reference number. As discussed in ‘*National Policy Context*’, the NPPF sets out criteria which sites must satisfy in order to be considered suitable for LGS designation. Suggested LGS submissions were assessed against the LGS criteria set out in Table 1. The criteria are derived from the NPPF, with the addition of criterion 4 which seeks to ensure designation as an LGS is compatible with the requirements of the local planning context and sustainable development.

2.10. The sites were assessed by means of site visits, undertaken during June and July 2016 by a Planning Officer. Desk based assessments were undertaken to gather additional information and establish whether or not sites were subject of any existing designations, identify any planning history and, more generally, the site’s status in relation to emerging Local Plan allocations.

2.11. Whilst undertaking the site visits, observations were made against the criteria set out below. In particular, criteria 2 and 3 were assessed / considered and recorded on the site visit record for each site.

Table 1. Explanation of Criteria for designating LGSs in East Cambridgeshire

Local Green Space Criteria	Explanation
1. Are in close proximity to the community they serve	<p>The NPPF does not define ‘close proximity’.</p> <p>We consider that a Local Green Space should be in easy walking distance (up to 400m or a 5 minute walk) from the local community it serves and must not be isolated or distant from communities.</p>
2. Are local in character and not an extensive tract of land	<p>The NPPF doesn’t define what is considered to be ‘an extensive tract of land’.</p> <p>We have not set a specific size limit for Local Green Spaces. However, blanket designations of swathes of open countryside adjacent to settlements or long distance linear routes would not be appropriate.</p>
<p>3. Demonstrably special to the local community because of its:</p> <p>a) Beauty b) Historic significance c) Recreational value d) Tranquillity e) Richness of its wildlife</p>	<p>For an open space to be designated as a Local Green Space it must meet at least one of the demonstrably special criteria:</p> <ul style="list-style-type: none"> • Beauty: enhances local character, adds to the setting of a building or groups of buildings; • Historic significance: listed building near or on area/open space, provide the setting of and/or views of listed building or historic assets such as a war memorial whose setting needs protecting. Also historic landscape features, such as ancient trees or old hedgerows; • Recreational value: play area, allotments, informal spaces in housing estates, sports and playing fields; • Tranquillity: spaces that are calm and allow for quiet enjoyment and reflection; • Richness of its wildlife: provides for biodiversity, geodiversity, known protected species, and/or priority habitats; <p>Further explanation of how we will assess sites against the demonstrably special criteria is provided in paras. 2.12 – 2.17 below.</p>
4. Consistent with the local	Local Green Space designations are not normally appropriate for sites

planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.	with existing planning permission/allocated in the Local Plan or Neighbourhood Plan for other uses unless it can be demonstrated that the Local Green Space can be incorporated within the site as part of the development.
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Application of “demonstrably special” criteria (Criterion 3)

2.12. In relation to the five ‘demonstrably special’ criteria set out in criterion 3 (of Table 1), the Strategic Planning Team have considered the following:

Beauty

2.13. Whether an open space is beautiful can be open to interpretation. Assessment against this criterion will take into account:

- The visual attractiveness of the site as a whole;
- The contribution the site makes to landscape or townscape character and local distinctiveness;
- The contribution the site makes to the physical form and layout of a settlement or neighbourhood.
- Whether the site offers long views through or beyond a settlement or neighbourhood or views of locally valued landmarks.

Historic Significance

2.14. The assessment of historic significance will be informed by consideration of:

- Whether the site provides a setting for heritage assets or other locally valued landmarks;
- Whether the site contains any historical features, such as ancient trees;
- Whether the site is associated with a historical figure or event;
- Whether there are any regular, historical events such as a village fete that are regularly held on the site;
- The Cambridgeshire Historic Environment Record.

Recreational Value

2.15. Many open spaces will likely meet this criterion. In general, sites should offer a variety of recreational opportunities, formal or informal, and of a good quality.

Tranquillity

2.16. The Tranquillity Map prepared by the CPRE⁴ will be used to help identify whether a site is located in an area that can be described as tranquil. Sites need to demonstrate a feeling of remoteness and quiet contemplation for the majority of the site and a general lack of artificial noise such as road traffic or nearby industry.

Richness of Wildlife

⁴ http://maps.cpre.org.uk/tranquillity_map.html?lon=0.29393&lat=52.34073&zoom=11

2.17. Many open spaces offer some benefit to wildlife. For a site to meet this criterion, there must be evidence that it is rich in wildlife, such as records, ecological evidence or expert advice. Sites already designated as a Site of Special Scientific Interest, National or Local Nature Reserve will not be considered appropriate for LGS designation as these are considered to be adequately protected by national legislation and other policies in the plan. The site could:

- Include a priority habitat as defined in the Cambridgeshire and Peterborough Biodiversity Action Plan;
- Include important landscape features, such as veteran trees, ancient woodland or ancient hedgerows;

Consistency with the local planning of sustainable development

2.18. Assessment relating to criterion 4 involved checking each site against certain information, such as planning history, existing designations and potential conflict with emerging allocations.

2.19. The LGS designation cannot be applied to sites with existing planning permission for development. In such circumstances, LGS designation will not be suitable and the site may therefore be excluded from the assessment process. Where a LGS suggestion is also being considered as a future development site through the Local Plan process, each proposal will continue to be assessed on its own merits.

2.20. In addition to LGS designation, there are many other statutory and policy tools already in place protecting certain important green areas. LGS designation is therefore a means of protecting sites which do not already fall under existing statutory designations or protective ownership.

2.21. LGS suggestions already covered by the following statutory designations may be excluded from the assessment as there already exists a legislative and policy framework to protect them:

- Sites of Special Scientific Interest (SSSIs)
- National Nature Reserves (NNR)
- Local Nature Reserves (LNR)
- Local Wildlife Sites (LWS)
- Historic Parks and Gardens
- Town and Village Greens and registered commons
- Land under protective ownership (e.g. National Trust, Woodland Trust, etc)..

Selecting sites for LGS designation

2.22. A detailed database record for each site was created based on information submitted during the consultation on the Preliminary Draft Local Plan, site visits and desk based research. A list of sites suitable for LGS designation has been drawn from these records along with a justification as to why each site was suitable or why it had been rejected.

2.23. One submitted site raised issues with how to apply criteria 4. The submitted site boundary overlapped with the boundary of an adjacent site with planning permission. The site in question included Pauline's Swamp in Burwell, which is a County Wildlife Site (CWS). The submitted site boundary extended beyond the CWS into the adjacent development site. It has therefore been redrawn to reflect that of the CWS, thus removing the conflict.

2.24. Table 2 sets out whether a site has been considered suitable for designation or not and provides a summary of the performance against the NPPF criteria.

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Table 2: Summary of LGS Recommendations and Performance against NPPF criteria

Site ID	Name of site	Suitable for designation?	Demonstrably Special:					Extensive tract of land	Reasoning
			Beauty	Historic significance	Recreational value	Tranquility	Richness of wildlife		
LGS/01/01	Ashley. Chapel Row/Church Street	Yes	Yes	No	Yes	No	Yes	No	Fulfils a number of criteria. An attractive area within the village conservation area that is well maintained. Site contains a pond and bench under a tree providing a pleasant location for quiet contemplation.
LGS/01/02	Ashley. High Street	No	No	No	Yes	No	No	Yes	A large site with an extensive feel on the edge of the village. Recreation uses are located in the corner nearest to the village. Does not fulfil criteria due to its extensive nature.
LGS/01/03	Ashley. Silehills Close	No	No	No	No	No	No	No	Does not fulfil criteria, the site is part of the highway
LGS/02/01	Bottisham. Ancient Meadows	Yes	No	No	Yes	No	No	No	Fulfils recreation criteria. Site is well used by village residents.
LGS/02/02	Bottisham. High Street	No	No	No	No	No	No	Yes	An extensive tract of meadow on the edge of the village adjacent to public footpath, no apparent public use of site.
LGS/03/01	Brinkley. Beechcroft Field	Yes	Yes	No	Yes	No	Yes	No	An attractive, well maintained site centrally located within the village in close proximity to a County Wildlife Site. Site fulfils a number of criteria, in particular in respect of recreation.
LGS/05/01	Burwell. Adjacent to DS Smith site	Yes	No	No	Yes	No	Yes	No	Although a large area, site has a clearly identifiable boundary and fulfils 2 criteria particularly in respect of wildlife, by providing wetland habitats, and is also a County Wildlife

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Site ID	Name of site	Suitable for designation?	Demonstrably Special:					Extensive tract of land	Reasoning
			Beauty	Historic significance	Recreational value	Tranquillity	Richness of wildlife		
									Site.
LGS/10/01	Stuntney (Ely CP). Stuntney Play Area, Lower Road	Yes	No	No	Yes	No	No	No	Fulfils criteria in respect of recreation, as the site offers an enclosed open space and equipment for play.
LGS/15/01	Kirtling. R/O Village Hall, The Street	Yes	No	No	Yes	No	No	No	Fulfils recreation criteria. Site is well used by residents for a wide range of recreational uses including football, and village events such as car shows and produce shows, the site has a mature planted boundary.
LGS/15/02	Kirtling. Cricket Pitch, The Street	Yes	No	No	Yes	No	No	No	Fulfils recreation criteria. Site is well used cricket field with clear outfield boundary which is also the site boundary, some of which has mature planting.
LGS/21/01	Reach. The Hythe	Yes	No	Yes	Yes	Yes	Yes	No	Fulfils 4 criteria. Particularly significant in respect of history, as the site of a former port.
LGS/23/01	Soham. Longmere Lane Fields	No	No	No	No	No	No	Yes	An extensive tract of land with no clear use at present. No obvious public use apart from byway through site. Does not fulfil any of the criteria.
LGS/26/01	Sutton. Station Road	No	No	No	Yes	No	No	Yes	An extensive tract of land comprising a mix of uses. The cricket field offers clear recreational value, however the remainder of the site is agricultural/ meadow that is not publically accessible with livestock grazing, therefore does not meet criteria.
LGS/26/02	Sutton. Bury Road	No	Yes	Yes	No	No	Yes	Yes	An exceptionally extensive tract of land. In agricultural use with no formal public access.
LGS/26/03	Sutton. Land off	No	No	No	Yes	No	No	No	Part of the submitted site appears to fulfil

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Site ID	Name of site	Suitable for designation?	Demonstrably Special:					Extensive tract of land	Reasoning
			Beauty	Historic significance	Recreational value	Tranquillity	Richness of wildlife		
	The Brook								recreational use, however at time of site visit there was no apparent public access. Remainder of submitted site is in agricultural use. Therefore, the site does not fulfil criteria.
LGS/26/04	Sutton. East of Lawn Lane	No	No	No	No	No	Yes	Yes	An extensive tract of land, therefore does not meet criteria. The submitted site is made up of two distinct parcels of land combined to form a larger area that is considered extensive in respect of Local Green Space designation.
LGS/26/05	Sutton. Stankers Pond	No	No	No	No	No	No	No	A very small area, which at the time of visiting was very overgrown, with no clear maintenance having been undertaken. Does not sufficiently fulfil any of the criteria.
LGS/28/01	Swaffham Prior. Playing area, High Street	Yes	No	Yes	Yes	No	No	No	A centrally located site within the village, and within Conservation Area that fulfils recreation criteria. The site offers an enclosed open space and equipment for play.
LGS/28/02	Swaffham Prior. Coopers Green, Green Head Road	Yes	Yes	No	Yes	Yes	No	No	Fulfils 3 criteria, most notably as a result of its quiet location adjacent to the churches, and opportunity for informal recreation/play.
LGS/28/03	Swaffham Prior. Burwell Tigers FC, Station Road.	No	No	No	Yes	No	No	No	Although site has clear recreational values, it does not fulfil criteria as not within reasonable proximity of the community. Site has a clear physical separation from village.
LGS/28/04	Swaffham Prior. Agricultural Field, east of B1102	No	No	No	No	No	No	Yes	Does not fulfil any criteria, and is an extensive tract of land, currently in agricultural use

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Site ID	Name of site	Suitable for designation?	Demonstrably Special:					Extensive tract of land	Reasoning
			Beauty	Historic significance	Recreational value	Tranquillity	Richness of wildlife		
LGS/28/05	Swaffham Prior. Agricultural field, east of B1102	No	No	No	No	No	No	Yes	Does not fulfil any criteria, and is an extensive tract of land, currently in agricultural use
LGS/28/06	Swaffham Prior. Agricultural field, east of B1102	No	No	No	No	No	No	Yes	Does not fulfil any criteria, and is an extensive tract of land, currently in agricultural use
LGS/28/07	Swaffham Prior. Agricultural field, east of B1102	No	No	No	No	No	No	Yes	Does not fulfil any criteria, and is an extensive tract of land, currently in agricultural use
LGS/28/08	Swaffham Prior. Agricultural field, east of B1102	No	No	No	No	No	No	Yes	Does not fulfil any criteria, and is an extensive tract of land, currently in agricultural use
LGS/28/09	Swaffham Prior. West of B1102	No	No	No	No	No	No	Yes	Does not fulfil any criteria, and is an extensive tract of land, currently in agricultural use
LGS/28/10	Swaffham Prior. North of 49 Lower Road	No	No	No	No	No	No	No	Does not fulfil any criteria, and is as currently in agricultural use
LGS/28/11	Swaffham Prior. Adjacent 75 High Street	No	No	No	No	No	No	No	Does not fulfil any criteria, no public access, no reasons given for suggested designation.
LGS/34/01	Witchford. Sandpit Drove	No	No	No	Yes	No	No	Yes	Does not fulfil criteria, although has recreational value, site is extensive length of byway.
LGS/34/02	Witchford. Victoria Green	Yes	No	No	Yes	No	Yes	No	Fulfils 2 criteria, most notably recreation in the form of equipped play area and area for informal recreation, although pond provides some wildlife benefit.
LGS/34/03	Witchford. Sports	No	No	No	Yes	No	No	Yes	Does not fulfil criteria, although site has

East Cambridgeshire District Council – Local Green Spaces Evidence Report

Site ID	Name of site	Suitable for designation?	Demonstrably Special:					Extensive tract of land	Reasoning
			Beauty	Historic significance	Recreational value	Tranquillity	Richness of wildlife		
	field, Bedwell Hay Lane.								recreational value and clear boundary's, views through into open countryside and beyond to Lancaster Way add to this large site's extensive feel.
LGS/34/04	Witchford. Millennium Wood	Yes	No	No	Yes	Yes	Yes	No	Fulfils a number of criteria, most significantly at present recreation, but also the wildlife and tranquillity value of a wooded area. Site is a well-used resource for the village.
LGS/34/05	Witchford. Allotments, Manor Road.	Yes	No	No	Yes	No	No	No	Fulfils recreation criteria. A well-used, well maintained allotment site.
LGS/34/06	Witchford. Old Scenes, Grunty Fen Road	No	No	No	Yes	No	No	Yes	Does not fulfil criteria, although site has recreational value, it is a length of permissive footpath.
LGS/34/07	Witchford. Old Recreation Ground	No	No	No	Yes	No	No	No	Does not fulfil criteria, although site has recreational value, it is not in reasonable proximity of community, with a clear separation from the village.
LGS/34/08	Witchford. Pond and Pamby's Plantation, Manor Road.	No	No	No	Yes	No	Yes	Yes	Does not fulfil criteria, although site has recreation values, as majority of site is a length of byway.
LGS/34/09	Witchford. The Common, Common Road	Yes	No	Yes	Yes	No	No	No	Fulfils 2 criteria, most notably recreational value with an equipped area for play and open space for informal recreation.
LGS/34/10	Witchford. Field End/ Wheats	Yes	No	No	Yes	No	No	No	Fulfils criteria in respect of recreational value as site offers opportunities for informal play within

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Site ID	Name of site	Suitable for designation?	Demonstrably Special:					Extensive tract of land	Reasoning
			Beauty	Historic significance	Recreational value	Tranquillity	Richness of wildlife		
	Close								the community it serves.
LGS/34/11	Witchford. Field west of West End	No	No	No	No	No	No	Yes	Does not fulfil any criteria, an extensive tract of agricultural grazing land with no public access.
LGS/34/12	Witchford. Allotments, Broadway	Yes	No	No	Yes	No	No	No	Fulfil recreational value criteria. A well-used, well maintained allotment site.
LGS/34/13	Witchford. South of Ward Way.	No	No	No	No	No	No	No	Does not sufficiently fulfil criteria in respect of recreational value. Does not fulfil other criteria.
LGS/34/14	Witchford. Edna's Wood, Grunty Fen Road	No	No	No	No	No	No	No	Does not fulfil criteria. Site is not in reasonable proximity of community with a clear separation from the village.
LGS/34/15	Witchford. Field East of Millenium Wood, Main Street.	No	No	No	No	No	No	No	Does not fulfil criteria, currently no public access, and is in use as paddock
LGS/34/16	Witchford. Fairchild's Wood	No	No	No	No	No	No	No	Does not fulfil criteria, site is not in reasonable proximity of community with a clear separation from the village.

3. Next Steps

- 3.1. Sites considered suitable for designation as LGS, as identified in Table 2 are shown on the draft policies map that accompanies the Further Draft Local Plan, scheduled for consultation in January 2017.
- 3.2. Those sites not considered to meet the LGS criteria, whilst they will not be designated, may still be protected under other policies in the Local Plan.
- 3.3. We welcome comments on proposed Local Green Spaces as part of the Further Draft Local Plan consultation. Any new sites put forward **during the Further Draft Local Plan consultation period only** will be considered in the same way as those considered in this report.
- 3.4. Comments received during the consultation on the Further Local Plan will inform the preparation of a Pre-Submission Local Plan. Further information on the different stages of Local Plan preparation, can be found in the Local Development Scheme on East Cambridgeshire District Council's website⁵.

⁵ <http://www.eastcambs.gov.uk/local-development-framework/monitoring-and-local-development-scheme>

Appendix A – Form D as issued as part of Preliminary Draft Local Plan

Preliminary Draft Local Plan Consultation February 2016

Form D – Suggested Local Green Spaces

As part of the Local Plan consultation local communities have the opportunities to submit sites for consideration as Local Green Spaces. This is a new national designation that aims to protect green areas or spaces. If you would like to suggest a site for consideration please fill in this form and send a map which clearly shows the area proposed for Local Green Spaces designation.

For further information please see Section 1 and Policy LP29 of the Preliminary Draft version of the Local Plan which can be viewed at: <http://www.eastcambs.gov.uk/local-development-framework/local-plan-review>

Please return your suggested Local Green Space designations and map to us by 11.59pm on Thursday 24 March 2016.

Part A: Your Details

Organisation	Agent organisation (if applicable):
Name:	Name:
Address for correspondence	Address:
Postcode:	Postcode:
Email:	Email:
Tel:	Tel:
Signature: (not required if submitted electronically)	Date:

Please tick this box if you <u>would not</u> like us to notify you of future consultations relevant to the comments which you make.	<input type="checkbox"/>
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Data Protection and Freedom of Information

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note that each comment and the name of the person who made the comment will be featured on the East Cambs website- comments will not be confidential. Full comments, including addresses, will also be available to view on request. **By submitting this form you are agreeing to these conditions.**

*Minimum information to be filled in, if the form is to be accepted. ** We will send all correspondence by email if you provide us with your email address. ***If Agent details are provided, we will send all correspondence to them.

Part B: Proposed Local Green Space Designation

Sites will be considered for designation as Local Green Spaces if the following can be met:

In reasonable close proximity to the community it serves; and

Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including playing fields), tranquility or richness of the wildlife; and

Local character and is not an extensive tract of land.

Section 1 and Policy LP29 of the Local Plan sets the criteria that will be used to determine if a proposed site is suitable for designation as a Local Green Space.

Please explain how this site meets the criteria and why it should be designated as a Local Green Space.

All suggested Local Green Spaces will be assessed and the preferred areas will be included in the next version of the East Cambs Local Plan due for consultation in summer 2016.

Please return this form and a map showing the proposed area of green space to planningpolicy@eastcambs.gov.uk or to Local Plan Consultation, East Cambs District Council, The Grange, Nutholt Lane, Ely, CB7 4EE

