



Document Reference
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East Cambridgeshire
District Council

Policy LP20 –Green Infrastructure, Trees and Woodland

November 2017

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1. Introduction and Policy Context

Introduction

- 1.1 East Cambridgeshire District Council is reviewing its Local Plan, which was last adopted in April 2015. The new Local Plan, which is hoped to be adopted in 2018, will provide a framework for development in the district until 2036 and beyond.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policy LP20 (of the Proposed Submission Local Plan, November 2017), which relates to green infrastructure, trees and woodland.

National policy

- 1.3 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.
- 1.4 Section 11 of the NPPF concerns "conserving and enhancing the natural environment" and there is a separate section on "Plan-making". The following points are particularly relevant:
 - Paragraph 114- Local planning authorities should 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.
 - Paragraph 118 - opportunities to incorporate biodiversity in and around developments should be encouraged...[and] planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss
 - Paragraph 157- Local Plans should set out a clear strategy for enhancing the natural environment.
 - Glossary – Green Infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
- 1.5 The above NPPF policy has been taken into account in preparing the Local Plan as a whole, and policy LP20 in particular.

2 East Cambridgeshire Context in Relation to Policy LP20

- 2.1 Green Infrastructure is a strategic network of multi-functional green spaces, and the connections between them, in both urban and rural areas, which is capable of delivering a range of environmental, economic, health and quality of life benefits for local communities. The network may comprise of spaces in public or private ownership, with or without public access.
- 2.2 The Cambridgeshire Green Infrastructure Strategy (2011) identifies the green infrastructure network for East Cambridgeshire under the heading of 'Eastern Fens and Towns'. This area is focussed on the towns of Ely, Littleport and Soham and their surrounding fenland landscape, along with the navigable Ely Ouse. This strategic area offers significant opportunities for:
 - Biodiversity: through enhancing and protecting the nationally important nature conservation areas along the Ely Ouse;

- Climate change: through adaptation measures such as urban cooling through tree planting, local flood alleviation and green space creation;
- Publically Accessible Open Space: through the creation of additional accessible spaces and routes in what is otherwise an intensively farmed area; and
- Rights of way: improve the Right of Way network to allow access to GI sites and the wider countryside.

2.3 The Cambridgeshire Green Infrastructure Strategy also identifies Chippenham Fen as a strategic area. This area offers the following significant opportunities:

- Biodiversity: through embracing and protecting the nationally and internationally important nature conservation area of Chippenham Fen;
- Climate change mitigation: measures such as carbon sequestration and flood storage and alleviation;
- Working with partners to support the development of Gateways that may exist in neighbouring Authority areas that link to this area;
- Contributing to landscape character: through improving and maintaining the fen landscape.

2.4 In relation to trees, whilst much of East Cambridgeshire is famed for its open fen landscape, trees and woodlands still play an important role. Pockets of Ancient Woodland still exist (especially towards the south, outside of the fens). The landscape is often framed by trees, such as the poplars which form shelter belts, and the heavily wooded 'isles', which help to define and integrate our settlements into the landscape.

3 Local Plan Policy: Preliminary Draft

3.1 The Preliminary Draft Local Plan (February 2016) contained a policy entitled Delivering Green Infrastructure. A limited number of representations were made on the policy, and in summary the key issues raised for the policy were:

- The comments received broadly supported the policy, together with additional commentary in relation to assessing sites for development and their impact on green infrastructure and designated nature sites.

3.2 No changes, were made to the policy for the Further Draft Local Plan. However, for completeness, and in order to fully reflect the Cambridgeshire Green Infrastructure Strategy, a new paragraph was added to the supporting text to follow existing paragraph 5.7.3, as follows:

“Chippenham Fen strategic area also offers the following significant opportunities:

- *Biodiversity: through embracing and protecting the nationally and internationally important nature conservation area of Chippenham Fen;*
- *Climate change mitigation: measures such as carbon sequestration and flood storage and alleviation;*
- *Working with partners to support the development of Gateways that may exist in neighbouring Authority areas that link to this area;*
- *Contributing to landscape character: through improving and maintaining the fen landscape.”*

4 Local Plan Policy: Further Draft

4.1 The Further Draft was published for consultation in January – February 2017.

- 4.2 Various comments were received during the Further Draft consultation, either supporting the policy or expressing concern over certain aspects of the policy. In summary, the key issues raised for the policy were:
- Various comments broadly supporting elements of the policy;
 - Various detailed suggestions, to improve clarity of policy wording, including strengthening wording relating to ensure certainty of mitigation, and the inclusion of the Wicken Fen Vision;
 - Concern that the policy as written would add a further cost burden on developers, which could make development unviable;
 - Various comments suggesting that mapping of the Green Infrastructure Network, designated sites and ecological networks should be included.
- 4.3 In response to comments, an additional paragraph, following Paragraph 5.7.4, has been included within the supporting text to fully reflect the Cambridgeshire Green Infrastructure Strategy in respect of Wicken Fen.
- 4.4 No changes have been made to the policy in respect of the comments relating to viability and the potential cost burden of provision. It is considered that the policy does not place an unnecessary burden, by seeking incorporation of green infrastructure ‘where appropriate’.
- 4.5 A key diagram showing the key areas of Green Infrastructure has not been included, as it is not considered necessary within this Local Plan. Separate strategies are the more appropriate place to set out detailed maps and proposals – the Local Plan simply needs to make pointers towards such strategies.
- 4.6 Further text has been added to the policy in relation to an opening ‘strategy’ for Green Infrastructure, as well as additional text referring to maintenance. In addition, the text has been strengthened in relation to proposals which might result in recreational pressure of designated sites.
- 4.7 In addition, like elsewhere in the plan, text has been added about recreational pressure on designated biodiversity sites (3rd para of policy).
- 4.8 Further paragraphs have also been added in respect of protecting the existing GI network and the need for mitigation if the network is harmed or lost in some way.
- 4.9 However, reflecting wider comments on the plan as a whole, suggesting that trees and woodland needs more attention, Policy LP20 (and supporting text) has been amended more significantly, by title and content, to include a section on trees and woodland. The new policy content, which is in line with the statutory duty to consider trees in development proposals, will give a clear framework for decision takers in relation to proposals for sites with trees either on-site, proposed to be added, or proposed to be removed or harmed.

5 Alternative Reasonable Options

- 5.1 The following alternative options have been considered for this policy. (Option 1 is the preferred policy approach which has been included in the Proposed Submission Local Plan.)

- 5.2 **Option 2:** No policy, and rely on national policy for this subject area. This option was rejected as it would not provide the same level of certainty, with a number of impacts unknown or unclear at the Sustainability Appraisal stage. Having a local policy is also supported by Natural England and other local bodies.

6 Conclusion

- 6.1 This Evidence Report demonstrates the rationale for the policy as contained in the Proposed Submission Draft Local Plan (November 2017). It is hoped this helps demonstrate how we have responded to comments received during the consultation stages, as well as how the latest evidence and national guidance has been taken into account.