



Document Reference
PS.EVR28

East Cambridgeshire
District Council

Policy LP28 – Landscape, Treescape and Built Environment character, including Cathedral Views

November 2017

Contents

1.	Introduction and Policy Context.....	1
2	East Cambridgeshire Context in Relation to Policy LP28	2
3	Local Plan Policy: Preliminary Draft.....	2
4	Local Plan Policy: Further Draft.....	2
5	Alternative Reasonable Options.....	3
6	Conclusion	3

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 LP28 (of the Proposed Submission Local Plan, November 2017), which relates to landscape and townscape character, including cathedral views.

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 paragraphs are particularly relevant:
 - Paragraph 111 - Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.
 - Paragraph 112 - Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
 - Paragraph 113 - Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected ... landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.
 - Paragraph 115 - Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.
- 1.5 The NPPG also includes advice on how the character of landscapes can be assessed to inform plan-making (Ref ID 8-001-20140306): specifically, it advises that Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape (this includes designated landscapes but also the wider countryside). The NPPG also offers guidance on how planning can take account of the quality of agricultural land (Ref ID 8-026-20140306).
- 1.6 The above NPPF policy and NPPG guidance has been taken into account in preparing the Local Plan as a whole, and policy LP28 in particular.

2 East Cambridgeshire Context in Relation to Policy LP28

- 2.1 Within East Cambridgeshire there are several distinct landscape character areas, consistent with the qualities defined within the national Landscape Character Assessment. In addition, Ely has a particularly distinctive character and is subject to views out across the surrounding fenland, and being an historic 'isle' settlement containing Ely Cathedral, clear views from the fen land to the City and Cathedral.

3 Local Plan Policy: Preliminary Draft

- 3.1 The Preliminary Draft Local Plan (February 2016) contained a policy entitled Landscape and Townscape Character, including Cathedral Views. A limited number of representations were made on the policy, and in summary the key issues raised for the policy were:
- Specific suggested wording changes to the section and policy titles.
 - Comments that the policy lacks clarity in respect of assessing tranquillity.
 - A number of broad expressions of support.
- 3.2 In response to the comments received at the Preliminary Draft stage, together with further consideration of existing or new evidence, the policy was amended for the Further Draft in the following ways.
- 3.3 The policy title was amended to read "*Safeguarding landscape and built environment character*".
- 3.4 We did not taken forward the suggestion to provide additional clarity in relation to the tranquillity of the district, as it is considered that this bullet of the policy clearly relates to light pollution in particular. Paragraph 6.8.3 further supports this by setting out that only the urban areas are brightly lit at night, and not the rural areas.

4 Local Plan Policy: Further Draft

- 4.1 The Further Draft was published for consultation in January – February 2017.
- 4.2 Various limited 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:
- Detailed suggestions to improve clarity of section and policy title;
 - Comments broadly supporting elements of the policy;
 - Comments that the policy is unclear and ambiguous in respect of 'general visual distinctiveness of Ely';
 - Comments that the policy needs significant rewording in order to be less restrictive in relation to the Cathedral views;
 - The evidence base behind the policy is lacking/weak;
 - An additional policy is being sought in relation to heritage at risk;
 - Site specific comments were received in relation to Witchford.
- 4.3 In response to the comments received at the Further Draft stage, together with further consideration of existing or new evidence, the policy has been amended for the Proposed Submission in the following ways.

- 4.4 The section heading and policy title have been amended to read ‘Safeguarding Landscape, Treescape and Built Environment Character’, and ‘Safeguarding Landscape, Treescape and Built Environment Character, including Cathedral Views’ respectively.
- 4.5 Paragraph 6.8.5 has been updated to reflect the current situation in respect of the Ely Environment Capacity Study.
- 4.6 A slight amendments to the policy has been made in response to comments relating to the restrictive nature of the policy, by introducing the word ‘significant’ before ‘impact’. No further amendment is appropriate, because the policy appropriately reflects the visual and historical significance of Ely Cathedral and the need to protect its views and setting. In respect of comments stating that the policy is ambiguous, particularly in relation to the ‘general visual distinctiveness of Ely’ no changes have been made because, as an ‘isle’ settlement recognised nationally and arguably internationally, Ely is a very distinctive settlement.
- 4.7 It has not been considered necessary to include an additional policy in relation to heritage at risk. The existing policies within the plan, and national legislation, afford appropriate policy and guidance in this regard, and appropriately support their being brought into re-use, and justification for works to heritage assets.
- 4.8 Where comments have been made in relation to specific sites (Witchford), they will be considered, and as appropriate addressed, within Section 7.

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.)
- 5.2 **Option 2:** No policy, and rely on national policy for this subject area. This option was rejected, as although it places great importance on protecting the landscape and built environment, it does not provide the locally specific policy and criteria that new development must satisfy in order to protect the distinctive character areas of the District.

6 Conclusion

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