

HADDENHAM PARISH COUNCIL

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6th July 2022

Mr D Kaiserman
C/O Penny O'Shea Consulting

VIA EMAIL

Dear Mr Kaiserman,

Thank you for your questions, received on 28 June 2022, in respect of the Haddenham and Aldreth Neighbourhood Plan which you are currently examining.

The Parish Council is pleased to respond to your question as follows.

Within the parish area (and therefore the neighbourhood plan area), there are no sites of international importance for wildlife. However, the western boundary of the parish is immediately adjacent to the Ouse Washes, a site of considerable international importance, and designated for its international importance for wildlife as a SAC, SPA and Ramsar site, as well as being a SSSI.

The protection of such sites, via the planning system, is not limited to development which may take place within such designations, but to development which may take place some considerable distance away from such designated sites but which might have a material effect on such sites. In this context, for example, Natural England has designated Impact Risk Zones (IRZs) stretching out from the Ouse Washes to cover the significant majority of the Parish, meaning development within the Parish area quite often should be tested against any impact it may have on the Ouse Washes. To illustrate this point in a practical sense, the Ouse Washes are particularly noted for its bird species, but many of those birds will forage a considerable distance away from the designated site itself, and into neighbouring land (predominantly farmland). Such foraging sites should, in simple terms, be protected if they are important to the functioning of the designated Ouse Washes. Land within the Parish, being immediately adjacent to the Ouse Washes, falls into the potential of being home to such foraging sites with a functional relationship to the Ouse Washes, and this potential is illustrated by the extensive IRZs stretching out from the Ouse Washes.

With the Parish being immediately adjacent to the internationally designated site, and land within the Parish itself having a clear functional link to the designated site, it was considered important that the Neighbourhood Plan set a clear and comprehensive policy on this matter.

You ask whether the inclusion of Policy HAD7 rests solely on concern that the East Cambridgeshire Natural Environment SPD, which contains a virtually identical policy, might not carry sufficient weight as it stands simply because it is not formally part of the statutory development plan. In short, yes, that is the rationale for including the policy in the Neighbourhood Plan.

An SPD only has limited status and weight in the planning decision system as noted in the Glossary of the NPPF (July 2021) It states "Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development

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plan. By including the policy in the Neighbourhood Plan it will, subject to your conclusions on the examination of the Plan, become part of the development plan and can be afforded the weight in decision making required of such a matter.

The Parish Council considers itself extremely fortunate to have such an internationally important wildlife site literally on its doorstep, and is committed, via its Neighbourhood Plan, to make sure all development proposals are tested against a robust development plan policy to ensure the site is protected for future generations. Relying on a non-development plan policy, in the form of an SPD, is not considered adequate.

It is also worth pointing out that East Cambridgeshire as a whole has a number of other internationally designated sites either within its boundaries (Wicken Fen, Chippenham Fen, Devil's Dyke) or in close and influencing proximity (eg Breckland). Depending on the scale, there is the potential of significant effects arising on those other internationally designated areas from development in the Parish, such as recreational pressure arising from new development. This further reinforces the importance of the need for the policy in the Neighbourhood Plan.

Finally, having reread the supporting text of the Neighbourhood Plan at paragraph 8.2, there might be justification (for the purpose of absolute clarity on where the Ouse Washes are in relation to the Parish and what the formal designations the Ouse Washes holds) for the sentence in the middle of the paragraph to be adjusted slightly so as to read (with **bold underline** the new suggested text):

“The Ouse Washes are around 3km to the west **of the settlements of Haddenham and Aldreth** and just outside the Plan Area and are designated as a Site of Special Scientific Interest, **Ramsar site**, Special Protection Area and Special Area of Conservation.”

These and other factual amendments can, we believe, be made without having an impact on the Basic Conditions and the outcome of the examination.

The Parish Council hopes this explanation provides sufficient further explanation as to the importance of the policy being retained within the Neighbourhood Plan as submitted.

Yours sincerely,



Victoria Taylor
Parish Clerk

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