

**Matter SC4 – Natural and Historic Environment**

**Sub-Matter SC4A Policy NH/2: Protecting and Enhancing Landscape Character**

**Representation Number: 58910**

**Representation Identification: 20942**

**Examination in Public of the SCDC Submitted Local Plan 2013**

**Written Statement from Cambridge Past, Present & Future**

**25<sup>th</sup> November, 2016**

**CambridgePPF is in the process of agreeing a Statement of Common Interest with South Cambridgeshire District Council on those Policies included under Matter SC3 and SC4 where CambridgePPF has made Representations. At the time of submitting these Written Statements, our responses to the Issues raised by the Inspector have been modified in the light of changes to the Policies proposed by the Council as part of the negotiation of the Statement of Common Ground.**

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**Issue ii:**

*Is the current Landscape Character Assessment sufficiently up to date to support Policy NH/2?*

- Landscape Character Assessment (LCA) is a standard methodology for identifying, describing, classifying, and mapping what is distinctive about our landscapes. The landscape types used for description and mapping purposes are the National Character Areas.
- In its 2014 update, Natural England identified 159 National Character Areas which are based on a combination of landscape, biodiversity, and geodiversity as well as economic activity. NCAs all share similar landscape characteristics although there can be significant variability within an Area at the local level. The South Cambridgeshire landscape falls into just five of these types.
- NCA mapping is typically done at a scale of 1:125,000. This scale is too crude for forward planning and development management purposes where a much finer resolution is required – probably 1:50,000 for the District with 1:10,000 for key sensitive areas.
- CambridgePPF therefore argues that the Council should commission an up-to-date local Landscape Character Assessment to replace the outdated 2003 Assessment which should be undertaken at a general scale of 1:50,000.
- In addition, CambridgePPF believes that Policy NH/2 should include specific reference to historic landscape character, such as the residual evidence of medieval ridge-and-furrow cultivation that may show up only at a finer grain resolution.

**Statement of Common Ground:**

- The Council has argued that Natural England has produced detailed profiles (2013 & 2104) for each of the National Character Areas, and these are sufficiently up-to-date. Further details on the character areas are provided in the East of England Typology (2011) and related Supplementary Planning Documents, which are to be revised to include the more detailed East of England Landscape Typology. This revision will ensure that the distinctive landscape characters within the district are protected and enhanced.
- The Council has proposed further explanation for Paragraph 6.8 as follows:

*“The East of England Landscape Typology provides further detail on the landscape character within the National Character Areas, providing a finer grain of landscape assessment based on geology, landform, natural features, landscape patterns, vegetation, settlement patterns, and historic features and development. Each typology is also assessed in terms of Historic Features, Enclosure Patterns, Settlement Patterns and Historic Development.”*

- CambridgePPF has agreed this modification and therefore withdraws its Representation

**Matter SC4 – Natural and Historic Environment**

**Sub-Matter SC4A Policy NH/4: Biodiversity**

**Representation Number: 58914**

**Representation Identification: 20942**

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**Matter SC4 Natural and Historic Environment  
SC4A Policy NH/4: Biodiversity  
Representation 58914**

**Issue iii.**

*Is the Text of Policy NH/4 sufficiently strong? Should the word “clearly” be replaced by “demonstrably and significantly”?*

- CambridgePPF believes that Policy NH/4 is too weak in its current form. All too often, biodiversity is the loser in the negotiations involved in many developments so its conservation must be given the higher status that a more emphatic policy would provide.
- CambridgePPF believes that Paragraph 3 is unacceptable in that it implies that planning permission may be approved if the loss of biodiversity can be “adequately mitigated”. What is “adequate”? Most mitigation schemes are woefully inadequate as it is very difficult to re-create the ecological complexity of habitat that is threatened. We argue that the level of mitigation must be qualified and suggest Paragraph 3 is changed as shown below.
- CambridgePPF also believes that the word “clearly” in Paragraph 6 is too weak. To whose benefit is the loss to be outweighed? Typically the main beneficiary is the developer. We therefore agree that “clearly” should be replaced with “demonstrably and significantly”. We also believe that the wording should qualify whom the beneficiary is by proposing the changes to the text below.

**Proposed Changes to the Plan**

- Paragraph 3 of Policy NH/4 should be revised as follows:  
*“.....with less harmful impacts), or mitigated so that the Protected Species, Priority Species or Priority Habitats are of a comparable status to their original condition, or, as a last resort,....”*
- Paragraph 6 of Policy NH/4 should be revised as follows:  
*“.....unless the need for, and benefits to the local community, of the development in that location demonstrably and significantly outweigh the loss.”*

**Statement of Common Ground:**

- At the time of making this Written Statement, agreement with the Council on wording to strengthen the Policy along the lines proposed above has not been finalised. The Council believes the use of the word “clearly” is sufficient: CambridgePPF believes “demonstrably (or clearly) and significantly” are needed. CambridgePPF also believes the phrase “adequately mitigated” requires qualifying.

**Matter SC4 – Natural and Historic Environment**

**Sub-Matter SC4A Policy NH/6: Green Infrastructure**

**Representation Number: 58916**

**Representation Identification: 20942**

**Examination in Public of the SCDC Submitted Local Plan 2013**

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**Matter SC4 Natural and Historic Environment  
SC4A Policy NH/6: Green Infrastructure  
Representation 58916**

**Issue vi.:**

*Should the protection and enhancement of the River Cam corridor be the subject of a separate policy?*

- CambridgePPF is disappointed that Policy NH/6, which we support in principle, makes no specific mention of the River Cam and its Corridor. There is also no mention in the supporting text. This is a significant oversight. The River Cam is one of the main landscape and biodiversity features of South Cambridgeshire. Its corridor is under increasing pressure from residential development, public access, and recreational use, and therefore requires positive management and enhancement to conserve its intrinsic values.
- CambridgePPF believes that to meet this requirement, a specific Policy on the River Cam Corridor, comparable to that proposed by Cambridge City Council in its submitted Local Plan (Policy 7) is justified, backed up by a River Cam Corridor Enhancement Guidance SPD.
- The River runs through the Local Authority Districts of South Cambridgeshire and Cambridge City. That the protection afforded to the River Cam Corridor within the City through its Local Plan policy should terminate abruptly at the City Boundary, seems bizarre. A combined Policy for the length of the River and its Corridor within both Districts is needed.

**Statement of Common Ground:**

- The Council believes the justification for a new Policy on the River Cam is insufficient in that most of the issues raised are already covered by Policies in the Plan (recreation, biodiversity, flooding etc), so a specific Policy would not add anything significant. Policy NH/6 is sufficiently wide-ranging to take into account the points we have raised.
- The Council has also confirmed that a River Cam Corridor Strategy is being prepared under Policy NH/6, and that it would be inappropriate to single out one project, or one river, for elevation to Policy status. Instead the Council has proposed the following addition to the end of Paragraph 6.31 to include reference to this Strategy:

*“An example of a Green Infrastructure project coming forward is a River Cam Corridor Strategy which is being prepared by local stakeholders.”*

- CambridgePPF agrees this modification and therefore withdraws its Representation

**Matter SC4 – Natural and Historic Environment**

**Sub-Matter SC4A Policy NH/7: Ancient Woodlands and Veteran Trees**

**Representation Number: 58917**

**Representation Identification: 20942**

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**Written Statement from Cambridge Past, Present & Future**

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**Matter SC4 Natural and Historic Environment**  
**SC4A Policy NH/7: Ancient Woodlands and Veteran Trees**  
**Representation 58917**

**Issue iv.**

*Should the wording of Policy NH/7 be strengthened?*

- CambridgePPF objects to this policy on two grounds – that it is too weak, and that the loss of ancient woodland and veteran trees can be mitigated.
- Paragraph 1 is too weak and should be strengthened in the same way as proposed for Policy NH/4 through the use of “demonstrably and significantly”.
- Paragraph 2 implies that the loss or damage to ancient woodland or veteran trees can be “mitigated”. How can you “mitigate” the loss of a 400 year old mature woodland or an old veteran tree? Plant some new trees elsewhere? The evolution over centuries of a whole complex woodland ecosystem with its diversity of micro-flora and fauna cannot be mitigated by a short-term fix.
- The Council should undertake a survey of all its ancient woodland and veteran trees as defined by Natural England as part of its Landscape Character Assessment (Policy NH/2), and make it quite unambiguous that development will not be allowed the damages or destroys such sites or trees

**Proposed Change to the Plan:**

- The Policy in its totality should read as follows:

*Policy NH/7: Ancient Woodlands and Veteran Trees*

*Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland or veteran trees (as shown on the Policies Map) found outside ancient woodland.*

**Statement of Common Ground:**

- At the time of making this Written Statement, agreement with the Council on wording to strengthen the Policy had not been finalised. The Council believes the use of the word “clearly” is sufficient: CambridgePPF believes “demonstrably (or clearly) and significantly” are needed. CambridgePPF also believes that the concept of “mitigating” the loss of ancient woodland or veteran trees should be dropped.