



East Cambridgeshire  
District Council

# **Hedgehog Recovery Design Guidance Supplementary Planning Document (SPD) – Reg 12(a) Consultation Statement**

Version 2: Adoption Stage

September 2024

## **1. Introduction**

- 1.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Council to consult the public and stakeholders before adopting a Supplementary Planning Document (SPD). Regulation 12(a) requires a Statement to be prepared setting out who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the final SPD.

## **2. Consultation Undertaken up to 3 May 2024**

- 2.1. In preparing the draft SPD, internal consultation within the Council took place and this resulted in the drafting and refining of the content of the consultation version SPD. The draft was subsequently considered by Finance and Assets Committee of the Council on 28<sup>th</sup> March 2024, where it was approved for the purposes of public consultation. The papers for that meeting (including a copy of the draft SPD) were publicly available on the Council's website seven days prior to the meeting taking place.
- 2.2. No external consultation took place on or before 3 May 2024.

## **3. Public consultation, from 3 May and 31 May 2024**

- 3.1. Public consultation started on 3 May 2024 and ended on 31 May 2024. Only representations made during that period have been formally considered, though wider social media comments were reviewed where identified them.
- 3.2. A copy of the draft SPD was made available for public inspection, free of charge on the Council's website at [www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents](http://www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents).
- 3.3. An email was sent out to all consultees on our database, of several hundred strong. A copy of the email is attached at appendix A. This included statutory consultees, local agents and developers and known hedgehog charities (see list at Appendix B). All the comments we received were via email.

## **4. Representations received**

- 4.1. We received 16 comments from separate organisations and individuals to the Hedgehog Recovery Design Guidance SPD. All the comments received are recorded in table 1 below. Whilst not strictly required, the Council has responded to each comment and this is recorded in the Council's Response column. If any changes are proposed to the SPD as a result of these comments, this will be shown in the Action Column of the table below.
- 4.2. While most of the comments were in support of the SPD, some were seeking changes to the SPD.

## 5. Issues Raised during consultation and how they have been addressed

Table 1: Summary of issues raised and ECDC's response

| Comment ID | Consultee Name<br>Chapter/ Para. No./ Policy No.<br>Support/ Object/ Observation | Comments   | Council's Response  | Action           |
|------------|--|--|---|------------------|
| HRS01      | Hedgehog Street (Grace Johnson)<br><br>Observation                               | <p>The use of artificial grass should be avoided at all costs. I don't think health and safety is a valid reason to install it over natural grass. The impact of this on wildlife and the wider environment is significant, and East Cambridgeshire District Council should take a firm stance on this.</p> <p>On hedgehog highway requirements; placing them towards the back of the garden is also something we recommend, so that it's further from the house and generally in shrubbery / a sheltered area. The draft SPD details that due to the widespread distribution of hedgehogs across the area, that any site should be assumed to have hedgehog potential, but then go on to say that only sites with hedgehogs should produce a management plan. This seems contradictory.</p> <p>More specific guidance on hedgehog home requirements may be useful, as some are more suitable than others. Hedgehog Street can advise on this.</p> | <p>Comments noted. Whilst all developments (excluding householder) "must provide a scheme of hedgehog recovery" irrespective of whether hedgehogs are known to be on site or not, the scale of such a scheme increases if hedgehogs are <i>known</i> to be on site. Thus, criterion (a) applies in those instances where hedgehogs are known to exist on site, and the criterion asks for a specific management plan for how such known hedgehogs will be protected. Where it is believed hedgehogs don't currently exist on site, then a scheme of hedgehog recovery still must be prepared, but clearly a management plan for known hedgehogs required under criterion (a) does not become an applicable requirement.</p> | No change to SPD |
| HRS02      | Anglian Water<br><br>Observation   | <p>Anglian Water is supportive of the overall aim of this design guide to address the decline in hedgehogs within East Cambridgeshire. It is noted that the policy requirements equally apply to non-residential development if the circumstances of</p>   | <p>Comments noted, but impractical to start to list examples as requested. It should be clear to both the developer and the planning decision maker</p>   |                  |

|       |   |  |   |                          |
|-------|---|--|---|--------------------------|
|       |   | <p>the site, and the proposed use of the site, provides reasonable prospects for one or more of the policy provisions to be achieved.</p> <p>Suggest it may be helpful for the supporting text to explain some of the circumstances where non-residential developments may be unable to meet the specific policy provisions set out in Policy HR1.</p>   | <p>whether or not there is any reasonable prospect of creating hedgehog habitats on the development site in question.</p>   |                          |
| HRS03 | <p>Mr Timothy Foddy</p> <p>Observation</p>                          | <p>New development is the primary concern. For new house developments in the area the following should be noted and is suggested to be included in planning consents;</p> <p>Include Hedgehog highways in all new developments; Include protection areas where Hedgehogs can sleep and hibernate - highways are no good if they can't find somewhere to sleep; Include 'underpasses' on all new roads where Hedgehogs and other wildlife can pass under roads instead of playing Russian roulette on them; Include a clause in the maintenance agreement to ensure the above is maintained; FORCE building companies to do these things rather than pay lip service!</p>   | <p>Comments Noted, and it is considered that all such suggested requirements are already included in the policy</p>   | <p>No Change to SPD.</p> |
| HRS04 | <p>Grace Dolman</p> <p>(Cambridge Hedgehogs)</p> <p>Observation</p> | <p>This is a really important piece of work, and we congratulate East Cambs for being ambitious for hedgehogs in our region. We would be happy to support you further as this plan evolves. Cambridge City Council offer a free service to residents to make hedgehog holes in fences. This has been popular and helps to create much needed hedgehog highways. We would suggest discussing this with Cambridge City Council and creating a similar scheme. We would be happy to make connections with the correct people. There are some roads that are particularly bad for hedgehog deaths. We would propose that you campaign for residents to record sightings of hedgehogs (dead or alive) using the national Big Hedgehog Map and then put up highway signs for awareness in areas where hedgehog deaths on the road are particularly prevalent. (BIG Hedgehog Map)</p> | <p>Comments Noted. The Council already promotes residents to record on the Big Hedgehog Map. Other suggestions raised will be considered, but outside of the preparation of this SPD.</p> | <p>No Change to SPD.</p> |

|       |   |   |   |                   |
|-------|---|---|---|-------------------|
| HRS05 | Sarah Nicholas<br>(Cambridge Past,<br>Present and<br>Future)<br><br>Observation | Cambridge PPF wish to support your Hedgehog Recovery Design Guidance SPD and welcome the initiative taken in engaging with the Public to identify an animal for special assistance. We support Policy HR1 however, note that it only applies to residential development. We ask that you consider whether it is feasible to apply the policy to major industrial/commercial developments.   | The SPD already provides a short statement towards the end of Policy HR1 for non-residential developments to equally apply the provisions set out for residential development if the circumstance of the site provides reasonable prospects for one or more of the listed provisions to be achieved.  | No Change to SPD. |
| HRS06 | William Page<br>(Pigeon)<br><br>Observation                                     | <p>On the whole, Pigeon supports the principles of the SPD.</p> <p>Requirement 'a' of Section 5 – Policy says that a scheme must “include a hedgehog management plan which provides a detailed arrangement for the conservation and enhancement of hedgehog habitats on site”, where hedgehogs are known to be present on site. Whilst we support this requirement, we would welcome some additional detail on the enhancement of hedgehog habitats, in terms of what type of enhancement measures are recommended, and how much enhancement is required. The SPD goes into greater detail when describing how to adapt the developed parts of the scheme (points b-i) but does not describe the specific measures which are most effective in enhancing habitats. We feel greater clarity and details of specific methods and quantity are necessary.</p> <p>Requirement 'e' states that a scheme must “demonstrate how the use of hard standing areas and garden decking is proposed to be kept to a minimum necessary to achieve the desired or required standards.” This requirement for hard standing to be kept 'to a minimum' is currently subjective and we would welcome guidance on how much hard standing will be accepted on schemes.</p> <p>Requirement 'g' states that for major residential development, the scheme must “identify, on any open space provided with the development an element of hedgehog friendly habitat to be created, such as hedgerow planting, scrub patches and loose (but safe) log piles”. In some cases, it may be that providing hedgehog friendly habitats may not be possible on-site due to</p> | <p>The comments regarding requirement 'a', 'e', and 'g' of Section 5 are noted. This SPD has provided guidance on the type of enhancement measures recommended for hedgehog habitats, with the precursor that agents and developers will put forward the most effective yet reasonable methods for the enhancement of these habitats that works within the wider context of the site. Due to the wide variables involved for each development site, it is not possible to spell out specific detailed arrangements.</p> <p>In respect of criterion (g) of this SPD, which requires the provision of hedgehog friendly habitats on any open space, it seems inconceivable that no habitats could be created which would support hedgehogs to roam, feed and/or reside. Whilst some sites might not enable a 'perfect' hedgehog habitat to be created, a simple scrub or hedgerow area is, for example, highly likely possible on even small open spaces created with major development. If not possible,</p> | No change to SPD. |

|       |  |  |   |                   |
|-------|--|--|---|-------------------|
|       |  | the specific nature of each scheme. We suggest that there is an allowance for hedgehog friendly habitats to be provided off-site in these cases, to ensure that in all situations their needs are being accounted for.   | the applicant would have to demonstrate very clearly why no suitable hedgehog habitats could be created.  |                   |
| HRS07 | Natural England<br>(Sharon Jenkins)<br><br>Observation | Whilst we welcome this opportunity to give our views and are supportive of the nature recovery ambitions of this Supplementary Planning Document, we do not have any specific comments to make.  | Comments Noted  | No Change to SPD. |
| HRS08 | Fiona Wynn<br><br>Observation                          | <p>Strongly support the requirement for Hedgehog Highways (with clear signs) to be installed in EVERY fence &amp; wall (not just one fence). With mixed native, species rich, Hedges being highly encouraged. However, it is suggested that highways are included in all gates/side gates to properties. This provides another important access route for Hedgehogs. The signs need to be on both sides of the fence or gate to prevent inadvertent blocking. The limiting of decking and avoiding artificial grass altogether is strongly supported.</p> <p>Could there be a % limit on the size of patios to size of plot ? Or maybe this is covered elsewhere regarding surface water run off &amp; limitations on hard surfaces. Could gravelled areas also be discouraged ?, as many people end up using regular toxic weedkiller spraying to keep 'tidy'. I personally have porous 'Xgrids' for main paths &amp; drive. The grids were filled with soil &amp; then seeded with grass/flowers that are mown. So, no harmful spraying required, but still accessible in winter. Would it be helpful to require developers to use wildflower seed mixes/turf in lawns rather than just plain monoculture of grass ?</p> <p>As many councils have done, I would strongly support an annual green wheelie bin charge. The free provision of garden 'waste' removal has meant widespread loss of garden compost heaps, stick/log piles. It's meant gardeners can all too easily be even more 'tidy', to great detriment of shelter/nesting sites for Hedgehogs, Newts, Frogs etc. Plus, less insect/invertebrate life within these more 'sterile' gardens.</p> | <p>Comments Noted</p> <p>The SPD requires developers to demonstrate how the use of hardstanding areas is proposed to be kept to a minimum. It is expected that whilst the quantum of patio sizes to a plot cannot be explicitly restricted within this SPD, the requirements to demonstrate a minimum level has been included.</p> <p>The wider suggestions are welcomed, but probably too specific for inclusion in this SPD. Nevertheless, as we build up wider hedgehog guidance, the comments will be reviewed again.</p> | No Change to SPD. |

|       |   |  |   |                   |
|-------|---|--|---|-------------------|
|       |   | Hedgehogs need medium sized leaves to make nests. Could there be stipulations about numbers of trees to be planted in new gardens and/or in communal areas that are specifically allocated for wildlife. E.g. - grow through Trees within Hedges or Trees/Hedge (blossom & fruit) that will help our vital pollinators too. Ponds in wildlife areas ?  |   |                   |
| HRS09 | Soham Town Council<br>Observation             | Whilst this Council recognise that it is important to protect and improve the environment for future generations, help nature recover and generally help bring back nature to the district, it feels that it may be impractical to implement.  | Comments Noted, but we consider the SPD is deliverable.   | No Change to SPD. |
| HRS10 | Debbie Mack (Historic England)<br>Observation | We do not have any comments to make on the draft SPD.  | Comments Noted  | No Change to SPD. |
| HRS11 | Isleham Parish Council<br>Support             | Isleham Parish Council unanimously supports the action to prepare a Hedgehog Recovery Design Guidance SPD so that hedgehogs are fully considered as part of the design and build of new developments.  | Comments Noted  | No Change to SPD. |
| HRS12 | Josephine Casey<br>Observation                | This can't have come too soon. It's rare now to see a hedgehog alive. People are sadly more inclined to drive around a pothole than avoid maiming a hedgehog.<br><br>I've never understood why allowances are generally never made for wildlife in general e.g. the developments, major roads etc. that are constructed across huge expanses of existing habitats. It isn't acceptable to just erect a sign warning 'deer' when it should be a requirement for developers to accommodate mammals existing trails and routes. | Comments Noted  | No Change to SPD. |
| HRS13 | John Gale<br>Support                          | The population of Hedgehogs in Ousden has decreased over the years due to an influx of the Badger population, and there has been no sighting of hedgehogs. It would be lovely to see another project to help improve hedgehog populations.   | Comments Noted  | No Change to SPD. |
| HRS14 | Elizabeth Gale<br>Observation                 | Can you approach all landscapers/ fencing companies/ Tree surgeons etc and encourage the necessity of hedgehog highways fencing to their customers at reduced rates...many clients are not aware these exist and are willing to get involved in hedgehog helping   | Comments Noted<br><br>Whilst the promotion of education and awareness of hedgehogs is something the council is actively doing (and the suggestions made welcome), | No Change to SPD. |

|       |  |   |  |                          |
|-------|--|---|--|--------------------------|
|       |  | <p>Promote hedgehog education/ awareness in schools and colleges...perhaps get art and design students involved in designing awareness posters ...and other effective ideas.</p> <p>Local papers are excellent educators of the public. Suffolk /Norfolk /Cambridge local papers. Surely wildlife / environmental Trust can contribute informative educational articles in local newspapers on a regular basis</p> <p>Promote hedgehog awareness in Libraries/ WI / Youth Centres/ Scouts Groups/ U3A organisations etc.</p> <p>Get museums to do an environment and nature art and design collective....getting public and community involved.</p> | <p>this SPD has to remain focussed on the planning issues.</p> |                          |
| HRS15 | <p>Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire</p> <p>Support</p> | <p>Thank you for consulting the Wildlife Trust regarding the above document. On behalf of the Wildlife Trust, I would like to fully support East Cambridgeshire's Hedgehog Recovery Design Guidance (SPD).</p>  | <p>Comments Noted</p>  | <p>No Change to SPD.</p> |
| HRS16 | <p>National Highways</p> <p>Observation (or no objection/ or support)</p>                  | <p>We have reviewed the document and note the details of set out within the draft document are unlikely to have a severe impact on the operation of the trunk road and we offer No Comment.</p>   | <p>Comments Noted</p>  | <p>No Change to SPD.</p> |



## Appendix A – Email text as sent to over 300 recipients:

### Draft Supplementary Planning Document (SPD): Hedgehog Recovery Design Guidance SPD

Dear Sir/Madam

We are emailing to consult you on a **draft Hedgehog Recovery Design Guidance SPD**.

The Council recognises that it has a significant role to play in protecting and improving the environment for future generations, help nature recover and generally help bring back nature to the district.

Following a public vote in Summer 2023 to determine which animal the public would most want to see assisted, a vote which was won by the hedgehog, the Council is embarking on a number of actions to help hedgehog numbers recover in East Cambridgeshire. One action is to prepare a Hedgehog Recovery Design Guidance SPD so that hedgehogs are fully considered as part of the design and build of new developments.

This SPD is in support of the 'Environment and Climate Change' section of the East Cambridgeshire Local Plan (2015, as amended 2023) as well as it responds to National Planning Policy and guidance.

Copies of the draft SPD and Consultation Notice are available for public inspection on the Council's website at: <http://www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents> and at reception of the Council (The Grange, Ely) during normal opening hours.

The consultation period starts on **3 May 2024** and ends on **31 May 2024**. Only comments made during this period will likely be taken into account. Any comments made after the consultation period may be discarded.

You may submit your comments either by email to [planningpolicy@eastcambs.gov.uk](mailto:planningpolicy@eastcambs.gov.uk) or send your comments via post to: Strategic Planning Team, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambs, CB7 4EE.

Please be aware all comments submitted on the SPD will likely be made available for public viewing. As part of the process, we will also be producing a Consultation Report which will include a summary of all the comments received and the Council's response to these comments.

There will likely only be a single consultation on the emerging SPD. Following consultation, all comments received will be considered and appropriate amendments made. The SPD is then scheduled to be adopted by the Council in Autumn 2024.

If you have any questions or queries regarding the draft SPD consultation please contact the Strategic Planning Team on (01353) 665555 or email [planningpolicy@eastcambs.gov.uk](mailto:planningpolicy@eastcambs.gov.uk)

We have consulted you because we think you may have an interest in the document or you are on our consultee database for planning policy matters. Please let us know if you wish to be removed from our database.

Kind Regards,

Strategic Planning Team, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambridgeshire.  
CB7 4EE Tel (01353) 665555

## **Appendix B**

### **List of all Consultees**

- All Parish Councils in East Cambridgeshire District Council.
- All statutory consultees
- All agents / developers as subscribed to be on the planning policy database
- A selection of local and national hedgehog charities

**For a full list of named consultees, please contact the strategic planning team.**