Greater Cambridge Biodiversity Supplementary Planning Document (SPD)

Statement of Consultation – Version 2 – Adoption Stage - January 2022

Contents

1. Introduction

1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 requires a local planning authority 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. Regulation 12(b) requires that Statement to also be published as part of the formal consultation on the SPD.

2. Background

2.1 The Greater Cambridge Biodiversity SPD has been prepared to assist with the implementation of policies within the adopted Local Plans covering the Greater Cambridge area, namely the South Cambridgeshire Local Plan (September 2018) and the Cambridge Local Plan (October 2018). The document expands and provides guidance on the application of policies specifically relating to the conservation and enhancement of biodiversity. The SPD supersedes the South Cambridgeshire Biodiversity SPD 2009.

3. Preparation of the draft SPD

3.1 In preparing the draft SPD, informal consultation was carried out with a range of officers from within the Greater Cambridge Shared Planning Service including representatives from Development Management, Built and Natural Environment and Policy teams. Once drafted, sections of the SPD were reviewed by relevant technical officers within the service, with suggested amendments incorporated into the draft document.

4. Public consultation on the Draft Greater Cambridge Biodiversity SPD

4.1 To actively engage with the local community and key stakeholders, the draft SPD was subject to an 8-week public consultation during the period 23 July 2021 to 17 September 2021, in accordance with the Greater Cambridge Statement of Community Involvement (2019), (including the Updated Addendum (December 2020) prepared in response to restrictions related to the Coronavirus pandemic).

4.2 The associated supporting documents made available with the Draft SPD were:

- Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) Screening Report
- Equalities Impact Assessment
- Consultation Statement (Draft SPD stage)

4.3 A range of specific and general consultation bodies and other relevant stakeholders were directly notified via email of the consultation arrangements for the draft SPD. A list of the organisations notified is attached at Appendix A. In summary the organisations and bodies contacted included, but were not limited to:

- Local Parish Councils
- Local Members
- Specific Consultation Bodies
- Cambridgeshire County Council
- Greater Cambridge Partnership
- Adjacent Local Authorities
- Cambridgeshire and Peterborough Combined Authority
- Delivery partners, including infrastructure and transport providers
- Community organisations
- General Consultation Bodies, including groups which represent the interests of different diversity groups based upon age, race, religion, disability.

4.4 In addition to statutory consultees and organisations, over 400 individuals who have expressed a wish to be kept informed of Planning Policy consultations via the Greater Cambridge Planning Service Consultation database were informed of the consultation via email, or by post where no email address was available.

4.5 To engage more widely with residents and businesses in the Greater Cambridge area, the consultation was publicised on both Councils' webpages and on social media platforms. A public notice was published in the Cambridge Independent newspaper week commencing 21 July 2021.

5. Consultation Methodology

5.1 Consultation on the Greater Cambridge Biodiversity Draft SPD took place from 9 am on Friday 23 July 2021 to 5pm on Friday 17 September 2021.

5.2 During the consultation period the draft SPD and associated supporting documents were available to view on the Greater Cambridge Shared Planning

website at: www.greatercambridgeplanning.org/biodiversity, and respondents were invited to complete an online questionnaire. A copy of the online questionnaire is attached at Appendix B. Respondents were also able to submit comments via email.

5.3 A contact email address and telephone number for the Natural Environment Team was included on all publicity materials allowing those experiencing difficulties accessing the documents online to seek assistance. Officers were able to facilitate alternative methods for viewing the documents and for comments to be submitted.

5.4 Alternative formats of the consultation documents were made available upon request (e.g., braille, translations into other languages and large print).

5.5 Respondents were able to request to be notified of the adoption of the SPD.

6. Representations received

6.1 23 separate individuals or organisations responded to the online questionnaire during the consultation. Six further online questionnaires were received; however, these were incomplete with no contact details supplied.

6.2 Graphs showing the overall percentage responses received to the first three questions of the questionnaire are attached as Appendix C. This analysis shows most of those responding to the questionnaire felt the guidance in the draft SPD was clear (62%). 79% thought the SPD will help in achieving positive outcomes for biodiversity as required by national legislation and adopted Local Plans. 67% of respondents thought the SPD included all relevant policy and legislation, with the remainder suggesting additional legislation to be incorporated into the final version of the document.

6.3 Comments submitted in response to the online questionnaire are set out in the schedule attached as Appendix D, along with the Councils' assessment of the issues, and where necessary, proposed modifications to the SPD.

6.4 During the consultation 16 separate individuals or organisations submitted comments on the draft SPD or supporting documents via email. These are recorded in the schedule attached as Appendix E, which includes assessment of points raised and any proposed modifications to the SPD.

6.5 Overall, 268 comments were received in response to the consultation from a total of 39 separate individuals or organisations. The majority of comments received were detailed, and suggested amendments to specific sections or paragraphs within the SPD. Where considered appropriate such suggested amendments have been

incorporated into the final version of the document. These specific and detailed observations were identified alongside five other common themes, which are set out in the following section along with a summary of how they have been addressed..

7. Main issues raised during consultation and how they have been addressed

7.1 **Theme 1:** Biodiversity Net Gain (BNG) Percentage

Several respondents raised concerns about the Councils aspirational 20% BNG described within the SPD. Whilst some consultees supported this aspiration, others stressed that this could not be set as a minimum target, due to the potential significant impacts on viability and land allocations. This would therefore be deemed creation of new policy and require assessment through a local plan adoption process.

Since publication of the draft SPD the Environment Act has received Royal Assent and the minimum mandatory 10% Biodiversity Net Gain (BNG) is now a requirement and is referenced within the revised SPD. The Local Planning Authorities agree that the additional +10% BNG aspiration is not a set requirement within the SPD and that any percentage above the now mandatory 10% BNG will require testing within the evidence of the emerging Greater Cambridge Local Plan. However, in recognition of the Councils' declared Biodiversity Emergencies and low baseline of protected and priority habitats within Greater Cambridge, the aspiration within the SPD has been retained to support and encourage developments to maximise opportunities for biodiversity enhancement.

Themed response covers unique ID references: 8, 9, 10, 13, 21, 22, 24, 30, 39, 50, 51, 66, 67, 77, 78, 101, 104, 105, 106, 109, 194, 195, 196, 203, 205, 211, 212, 225, 276

7.2 **Theme 2:** Biodiversity Net Gain Mechanism

Several respondents requested further guidance within the SPD on a delivery mechanism for providing offsite BNG in Greater Cambridge. At the time of drafting the SPD there is no formal national or local mechanism in place to enable developers to purchase offsite BNG credits for local authority 'approved' BNG schemes and providers. Since drafting the SPD the Environment Act has now been given Royal Assent and provides clearer guidance on how BNG should be planned

and secured, however, full details on mechanism and the proposed BNG site register are not scheduled until Spring 2023.

In the interim any proposed offsite BNG will be required to identify and propose suitable sites and provide detailed management prescriptions for a minimum of 30 years. These schemes will need to demonstrate that BNG best practice has been followed and that an appropriate S106 legal agreement can be agreed between all parties that secures the ongoing management and monitoring of the BNG. The Councils recognise that an offsite BNG policy and mechanism is required to implement the aspirations of both councils within the emerging Greater Cambridge Local Plan. Strategic sites for BNG investment are being identified through the emerging Greater Cambridge Local Plan evidence base and stakeholder consultation. This work will include a proposed local mechanism for prioritisation and delivery of offsite BNG provision. In the interim period the Local Planning Authorities will produce an offsite BNG position statement to provide guidance for applicants and potential BNG providers around appropriate off site BNG provision and how this will be assessed as part of a planning application.

Themed response covers unique ID references numbers: 20, 29, 34, 37, 38, 40, 42, 48, 110, 115, 116, 117, 119, 120, 123, 139, 207, 218

7.3 Theme 3: Requests for additional detail versus requirement for succinctness

A number of respondents requested more detail within the SPD on potentially relevant plans and case studies, whilst others felt the SPD was already too long and technical to provide clear and concise guidance. The Councils have made the decision to not reference all related plans and strategies since the list would be very long as biodiversity is integral to a diverse range of disciplines, services, and associated documents. The main framework of legislation and policies have been outlined and the SPD references general links to local documents such as neighbourhood plans. This referencing via websites allows for additions and updates to plans to be accessible during the lifespan of the SPD.

For succinctness the purpose of the SPD is to provide guidance on planning policy and process rather than be a design guide for creation of biodiversity habitats, species enhancement and ongoing management. Good practice and design are well covered in existing guidance from statutory and non-statutory bodies and are best referenced direct from source to ensure the guidance is maintained and up to date.

The Councils agree that good practice and design case studies are beneficial to applicants, and their agents, and commit to collating good examples to share on the

Greater Cambridge Shared Planning website in support of the SPD. These will not be embedded within the SPD, to allow greater flexibility to update the case studies as appropriate.

Themed response covers unique ID references numbers: 2, 3, 4, 5, 6, 7, 12, 14, 16, 23, 28, 43, 46, 47, 49, 54, 56, 57, 68, 71, 83, 217, 230, 237, 240, 249, 252

7.4 Theme 4: Proportionality for scales of development site

A small number of respondents felt the SPD should provide more proportionality of ecological requirements with regard site size. The Environment Act is clear that the mandatory 10% BNG applies to all developments that require a planning application to be submitted. The proportionality and reasonableness of required survey information would be considered by officers during pre-application discussions and determination. However, this will not be based on site size alone, but rather existing and adjacent habitats and likelihood for protected species to be impacted by the proposals. However, sound decisions require appropriate, up to date data to allow consideration against national and local policies, including the mitigation hierarchy and BNG requirements.

The DEFRA small site BNG calculator is now available and is referenced in the final version of the SPD. This provides a more simplistic tool for assessing loss and gains on smaller sites.

Themed response covers unique ID references numbers: 19, 63

7.5 Theme 5: General comments or statements of support for the draft SPD

Where comments were general in nature, often in support of the proposed content, these were noted and amendments to the SPD were proposed where considered appropriate.

Themed response covers unique ID references: 1, 11, 18, 26, 27, 31, 35, 45, 52, 55, 59, 60, 62, 70, 73, 75, 80, 85, 90, 91, 92, 93, 94, 95, 96, 97, 98, 112, 118, 125, 126, 127, 128, 129, 133, 135, 137, 142, 143, 144, 145, 151, 155, 156, 162, 184, 186, 189, 191, 198, 199, 200, 201, 202, 204, 206, 209, 213, 214, 215, 216, 219, 223, 226, 228, 253, 254, 256, 257, 258

7.6 **Theme 6:** Specific reference amendment proposals to the draft SPD

Where respondents made specific reference to paragraphs and suggested amendments to provide greater clarity, detail or avoid confusion, these were reviewed and, where the proposed changes were considered appropriate, have been amended in the final version of the SPD. Approximately 30 suggestions were accepted and are incorporated within the final SPD.

Themed response covers unique ID references: 15, 17, 32, 33, 36, 41, 53, 58, 61, 64, 65, 72, 74, 76, 79, 81, 82, 84, 86, 87, 88, 89, 99, 100, 102, 103, 111, 113, 114, 121, 122, 130, 131, 132, 134, 136, 138, 140, 141, 146, 147, 148, 149, 150, 152, 153, 154, 157, 158, 159, 160, 161, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 178, 179, 180, 181, 182, 183, 185, 187, 188, 190, 192, 193, 208, 210, 220, 221, 222, 224, 227, 229, 231, 232, 233, 234, 235, 236, 238, 239, 241, 242, 243, 244, 245, 246, 247, 248, 250, 251, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 277.

9. Amendments to Consultation draft

9.1 All modifications to the SPD following consultation on the draft version are shown as tracked changes on the document attached as Appendix F. These will be incorporated into the final adopted version of the SPD.

Appendix A – List of organisations consulted

The following organisations were directly notified of the draft Biodiversity SPD via email, or by post where no email address was available. Individuals are not listed. It should be noted that other individuals and organisations were also contacted that do not appear on this list.

All Parish Councils and Residents Associations
Abellio Greater Anglia
Accent Nene Housing Society Limited
Addenbrooke's Equalities Officer
Adjacent Local Authorities
Advisory Council for the Education of Romany and other Travellers (ACERT)
Age UK Cambridgeshire & Peterborough
Airport Operators Association
Amusement Catering Equipment Society (ACES)
Anglia Ruskin University
Anglian Water
Bedfordshire and River Ivel Internal Drainage Board
Bedfordshire Pilgrims Housing Association
British Gas
British Horse Society
British Romani Union
BT Group Plc
Building Research Establishment
Cam Health
Cambridge and County Developments (formerly Cambridge Housing Society)
Cambridge Area Bus Users
Cambridge Campaign for Better Transport
Cambridge and District Citizens Advice Bureau
Cambridge Council for Voluntary Service
Cambridge Crown Court
Cambridge Cycling Campaign
Cambridge Dial a Ride
Cambridge Ethnic Community Forum
Cambridge Fire and Rescue Service
Cambridge Friends of the Earth
Cambridge Ramblers
Cambridge Inter-Faith Group
Cambridge Past, Present & Future
Cambridge Peterborough & South Lincolnshire (CPSL) Mind
Cambridge Rape Crisis Centre
Cambridge Regional College

Cambridge University Hospital NHS Foundation Trust
Cambridge Water
Cambridge Women's Aid
Cambridge Women's Resource Centre
Cambridgeshire & Peterborough NHS Foundation Trust
Cambridgeshire ACRE
Cambridgeshire and Peterborough Association of Local Councils
Cambridgeshire and Peterborough Campaign to Protect Rural England
Cambridgeshire and Peterborough Clinical Commissioning Group
Cambridgeshire and Peterborough Combined Authority
Cambridgeshire Chamber of Commerce
Cambridgeshire Community Foundation
Cambridgeshire Constabulary
Cambridgeshire County Council
Cambridgeshire Ecumenical Council
Cambridgeshire Fire and Rescue Service
Cambridgeshire Football Association
Cambridgeshire Health and Wellbeing Board
Cambridgeshire Race Equality & Diversity Service
Care Network Cambridgeshire
Centre 33
Children & Young People's Participation Service (ChYpPS)
Church Commissioners for England
Civil Aviation Authority (CAA)
Confederation of British Industry - East of England
Conservators of the River Cam
Country Land & Business Association
CPSL Mind
Cornerstone Telecommunications Infrastructure LTD (CTIL)
Defence Infrastructure Organisation
Department for Business Innovation and Skills
Department of Environment, Food and Rural Affairs
Department for Transport
Design Council
Disability Cambridgeshire
East West Rail
Eastern Region Rowing Council
EDF Energy
Education and Skills Funding Agency
EE
Ely Diocesan Board
Ely Group of Internal Drainage Boards
Encompass Network
Energy Assets Networks Ltd

Environment Agency
Equality and Human Rights Commission
ESP Utilities Group
Federation of Small Businesses
Fields in Trust
Flagship Homes
Forestry Commission
Friends, Families and Travellers
Greater Cambridge Partnership
Harlaxton Energy Networks Ltd.
Hastoe Housing Association Ltd.
Hazardous Installations Inspectorate
Health and Safety Executive
Healthwatch Cambridgeshire
Highways England
Historic England
Home Builders Federation (HBF)
Homes England
Hundred Houses Society Limited
Huntingdonshire Association for Community Transport (HACT)
Iceni Homes
Indigo Networks
Institute of Directors - Eastern Branch
Lead Local Flood Authority (LLFA)
Logistics UK (formerly Freight Transport Association)
Marine Management Organisation
National Grid plc
National House Building Council
National Housing Federation
Natural Cambridgeshire
Natural England
Network Rail
NHS England
Office of Rail and Road
Openreach
Ormiston Children's and Family Trust
Over and Willingham Internal Drainage Board
Planning Inspectorate
Post Office Property
Road Haulage Association Ltd.
Royal Mail
RSPB
Sanctuary Housing Association
Shelter

South Cambridgeshire Youth Council
Sport England
SSE
Stagecoach East
Sustrans (East of England)
Swavesey Internal Drainage Board
The Association of Circus Proprietors of Great Britain
The Association of Independent Showmen (AIS)
The Coal Authority
The Crown Estate
The Kite Trust
The Lawn Tennis Association
The Magog Trust
The National Trust
The Showman's Guild of Great Britain
The Society of Independent Roundabout Proprietors
The Theatres Trust
The Traveller Movement
The Wildlife Trust
Transport for London
Travel for Work Partnership
Traveller Liaison
The Traveller Movement
UK Power Networks
University of Cambridge
Utility Assets
Virgin Media
Woodland Trust

Appendix B – Draft Biodiversity SPD consultation online questionnaire

Question 1

The first four chapters of the Biodiversity Supplementary Planning Document (SPD) set the context of relevant policy and legislation which the SPD needs to comply with. Do you think that we have omitted any important, relevant policies or legislation?

- Yes
- No

Question 2

Do you think that the guidance in this SPD is clear?

- Very clear
- Mostly clear
- Neither clear nor unclear
- Not very clear
- Not at all clear

Question 3

Do you think that this SPD will help us achieve the positive outcomes for biodiversity required by national legislation and our adopted Local Plans?

- Yes
- Somewhat
- No
  (Please explain your answer)

Question 4

Can you tell us of any case studies (from an English Local Planning Authority) which demonstrate good examples of how Biodiversity Net Gain is being used, or other best practice that we could incorporate into this SPD to add value?

Question 5

Please tell us what you liked or didn't like about this SPD.

Question 6

Do you have any comments about the Equalities Impact Assessment published alongside the draft SPD?

Question 7

Do you have any comments about the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report published alongside the draft SPD?

Question 8

What is your name?

Question 9

Are you answering as:

- An individual
- On behalf of an organisation or company (please state below)

Question 10

Please enter your email address

Question 11

Do you want to be informed about the outcome of this consultation?

- Yes
- No

Question 12

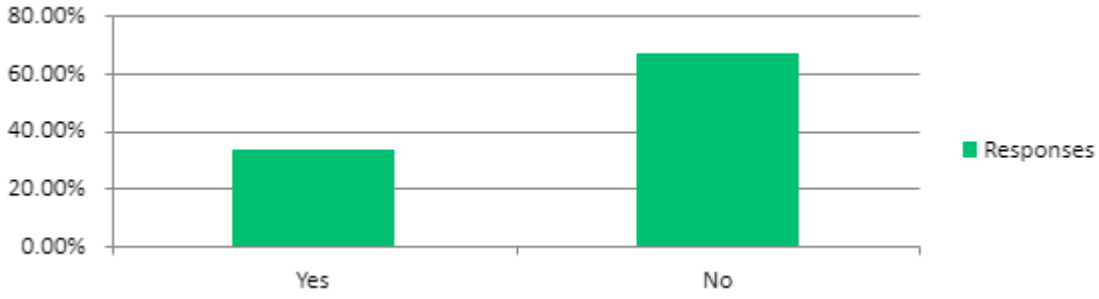
Do you want to be informed about future consultations on planning policy and guidance held by the Greater Cambridge Shared Planning Service, the shared service for Cambridge City and South Cambridgeshire District Councils?

- Yes
- No

Appendix C – Overall percentage responses to Questions 1, 2 & 3 of online questionnaire

Question 1

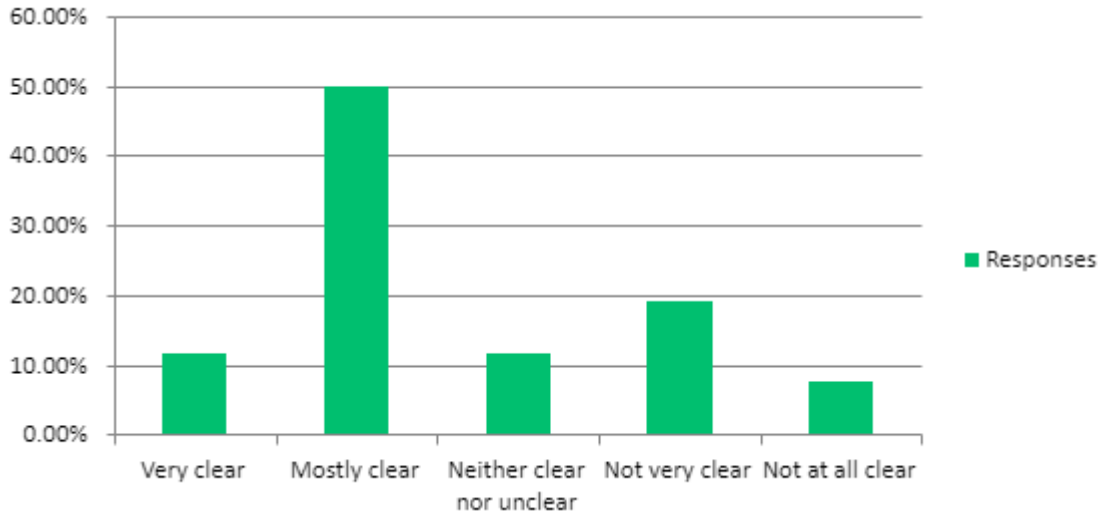
The first four chapters of the Biodiversity Supplementary Planning Document (SPD) set the context of relevant policy and legislation which the SPD needs to comply with. Do you think that we have omitted any important, relevant policies or legislation?



Question 2

Do you think that the guidance in this SPD is clear?

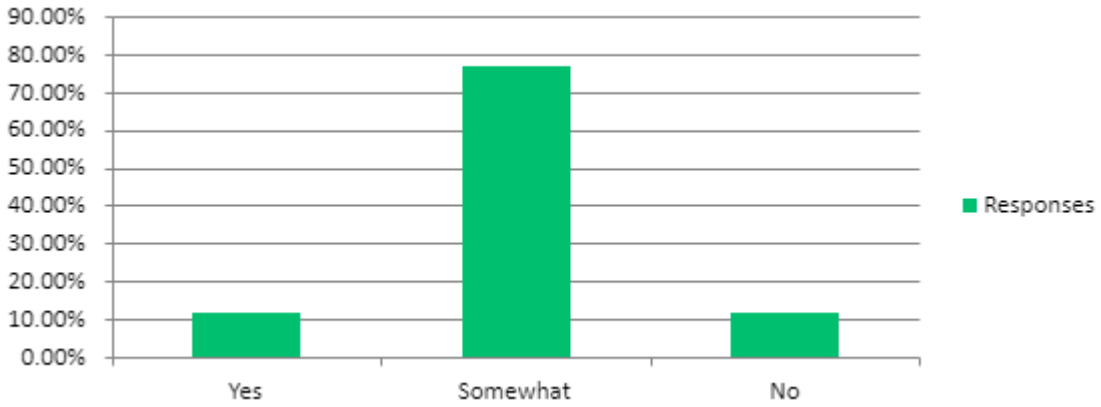
- Very clear
- Mostly clear
- Neither clear nor unclear
- Not very clear
- Not at all clear



Question 3

Do you think that this SPD will help us achieve the positive outcomes for biodiversity required by national legislation and our adopted Local Plans?

- Yes
- Somewhat
- No



Appendix D – Online survey representations and responses in survey question order

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
5	1	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / General comment	We think that reference to the following policy documents would be beneficial: 1. Design Codes New National Design Code Guidance was announced recently together with changes to the NPPF: Vision for building beautiful places set out at landmark design event - GOV.UK (www.gov.uk) 'The National Model Design Code - a toolkit to enable every council and community to create their own local design requirement. Guidance is provided across all aspects of new development including tree-lined streets, sustainable drainage and design to support walking and cycling' 'The changes to the National Planning Policy Framework set an expectation that good quality design should be approved, while poor quality should be rejected and includes an environmental commitment to ensure that all streets are lined with trees' 'Nature' starts on page 17 of Part 2 of the Guidance Notes: National Model Design Code: Part 2 - Guidance Notes (publishing.service.gov.uk) 2. Re: Listing of SCDC SPDs in the Draft Biodiversity SPD Section 3.5 In paragraph 3.5.2 this listing does not include reference to the Village Design Statement SPDs for Caldecote, Fulbourn, Gamlingay, Over, Papworth Everard, Sawston and Swavesey. The Fulbourn Village Design Statement certainly contains information on local biodiversity.	3 / Noted.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
6	1	British Horse Society / General comment	Cambridgeshire Rights of Way Improvement Plan. There are many references to well being and access to the countryside yet no reference to the RoWIP.	3 / Noted. The Councils consider that rights of way are related but not central to the SPD. Green Infrastructure evidence supporting the Greater Cambridge Local Plan incorporates consideration of Rights of Way.
3	1	Cottenham Parish Council / General comment	On page 18, where you mention supplementary planning documents, there is no mention of either the Cottenham or Histon Neighbourhood Plans.	3 / Noted. Section 3.4 includes information on neighbourhood plans and links to where they can be found on the Greater Cambridge Shared Planning website.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
9	1	Hill Residential Ltd / General comment	The NPPF and Planning Practice Guide are clear that development plans should set out the contributions expected from development, including for green infrastructure. There is no reference to that important legislation, policy and guidance. That is fundamental to the SPD, because the SPD seeks to introduce a new policy approach which has not been tested via the development plan process. This is particularly important because the adopted local plans have been put in place and tested for their impact on the capacity of sites and viability. This SPD is not accompanied by any assessments which examine either of those issues. There is no evidence presented as to the costs of imposing a 10% or 20% gain in habitat units on site. Similarly, there are no assessments of the impact on development capacity of delivering a 10% or 20% gain in biodiversity units on site. The local plans have sites within them where development capacity has been tested, but there is no evidence that those capacities cannot be delivered alongside the level of habitat gain sought. There is no reference to policy or guidance on viability and viability testing. No assessment has been made as to the increased costs of provision or maintenance. Additional costs could impact on the delivery of affordable housing or other community benefits.	1 / Noted. As addressed by the theme response, the SPD does not seek to impose new policy. Amendments have been made to clarify this point.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
276	1	Hill Residential Ltd / General comment	Throughout the document refers to DEFRA Metric 2, but on 7th July that Metric was updated to version 3. Whilst we support the use of a consistent approach to assessing biodiversity gains, we have concerns regarding the Metric as it stands as it is known to include errors within its spreadsheets and does not take into all biodiversity measures in assessing gains. It remains a draft and subject to testing and therefore a more rounded approach to assessing biodiversity gains is required. Assessment of the biodiversity impact and measures proposed needs, in our view, to be undertaken drawing on a number of sources. The use of DEFRA Biodiversity Metric 3 could be part of that, but acknowledging that the Metric's website clearly states that "errors or problems identified in the materials or function" of Metric 3 will be addressed over the next two years, that it is based on an assessment of habitat as a proxy for biodiversity, and that the Metric does not score non-habitat biodiversity measures, an assessment of gain requires the application of professional knowledge and judgement to come to a conclusion on biodiversity enhancement and gain.	1 / Noted. All references to the DEFRA Biodiversity Metric 2 within the SPD have been updated to Version 3. The SPD requires production of a Biodiversity Gain Plan for all major development. This would include BNG habitat based provision as well as non-habitat biodiversity measures.
1	1	Individual - name provided / General comment	The importance of retaining private gardens. Much of the emphasis in the document is for large developments and public areas which is very important. However, many forms of wildlife, trees and plant life can be found in even a small private garden. Building development, beyond small extensions, should not be allowed eg. putting several houses or flats on a relatively small plot	5 / Noted. Protecting garden land is not within the scope of the SPD which cannot set new policy; rather it explains how Local Plan policies should be interpreted and applied and provides guidance. The SPD at

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
				various points refers to supporting habitat provision in gardens.
2	1	Individual - name provided / General comment	I answered Yes but I don't really know, because I can't read through 72 pages. I just want to know the important things, as simple rules which are concise and intelligible. I want to see: 1) a strict limit on the number of close-boarded or other solid fences or walls so that the majority of properties in developments have gardens which are open for wild animals to traverse large distances away from the road but well within the curtilage of a village or town. I have not seen a live hedgehog in Whittlesford for nearly ten years. 2) an obligation for all developments to include wider grass verges separating the carriage of a road from the pedestrian footway both to increase safety and biodiversity, and for there to be a minimum, set by the Council in the local plan, for the number of trees present in such verges per number of properties. 3) a statutory minimum width of hedgerows and a minimum area of hedgerow defined in some meaningful way which ensures rural areas are lined with sufficient vegetation around fields that support biodiversity and provide protection for animals wishing to traverse the land 4) clear moves (and with incentives) to join up more of the small areas of disjointed woodland that is interspersed with agricultural land in order to decrease the risk of "islandisation" which causes species extinction. And guidelines for the creation of hedgerows around fields that allow areas of woodland to be joined up by better green corridors.	3 / Noted. 1) Not amended. Wildlife Friendly boundary treatments are referenced in section B5. 2) This is an SPD and cannot set new policy. 3)This is an SPD and cannot set new policy. 4) is outside the scope of the SPD but relevant to the emerging Strategic Green Infrastructure Initiatives included in the Greater Cambridge Local Plan First Proposals.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
4	1	Individual - name provided / General comment	3.2 National Policy and Guidance. Based on the revised NPPF in July. Need to revisit and check all paragraphs are correct. 3.5.2 3.5.2 3.5.2 Add Cambridge East: North of Cherry Hinton SPD Village Design Statement SPDs (Caldecote, Fulbourn, Gamlingay, Over, Papworth Everard, Sawston, Swavesey) Orchard Park Design Guidance SPD. 3.7.1 Part of para is repetitive. 4.5.2 Amend Fen Edge Chapter 4 - are there any important plants within the chalk streams that need protection or enhancement?	3 / References to the NPPF have been updated to reflect the 2021 version.
10	1	L&Q Estates and Hill / General comment	The SPD seeks use of the Biodiversity 2.0 Metric or its successor. In early July 2021, Defra and Natural England have now replaced this version with a Metric 3.0 although we are not yet convinced it is fit for purpose as it has come under criticism from several ecologists and academics. The NPPF and PPG expect that “Plans” should set out contributions expected from development, including green infrastructure. That text needs to be reflected in this section of the SPD. It is important that policies are set out in “Plans” where they can be tested for their impact on development for matters such as viability and capacity. Paragraph 1.3.2 says that the SPD does not create policy but seeking to negotiate a 10% or a 20% net gain in biodiversity is exactly that.	1 / Noted, addressed by theme response 1.
7	1	Mott Macdonald / General comment	Town Country Planning (EIA) Regulations not mentioned. This would appear to be a major omission given that any development which is likely to have significant effects will be subject to EIA. Nothing in the document about climate change policy – yet biodiversity has potential benefits in terms of increasing sequestration of carbon through different new habitat creation. Climate change is going to affect the viability of some species	3 / This is an SPD which provides practical advice and guidance on how to develop proposals that comply with the NPPF and the district-wide policies. The next Local

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
			which are sensitive to climate and which are unlikely to survive in our region in the medium to long term as a result. Whilst it is probably not the role of the SPD to recognise the impact of climate change on species (and individual developers cannot change these facts) it might be useful to have a more forward looking approach to the effects of climate change. Protect what is most likely to survive a changing climate and put in measures to support new species that will arrive in the area in years to come. And, for example, don't promote habitat creation or tree planting with species that will struggle in 10/20/30 years time. This is particularly relevant given the 30 year span required for biodiversity net gain. We believe the SPD needs to be more forward looking and should be actively encouraging developers to think about how their developments can mitigate climate change by planting. There should be advice/guidance/references to sources of information on what biodiversity enhancements/mitigations are more likely to be resilient to climate change, and which will be effective at improving carbon sequestration	Plan will be acknowledging changing climate and its effects on biodiversity. This SPD seeks to protect, buffer, link and create new habitats that would allow species the best opportunity to survive, adapt and disperse in response to a changing climate.
8	1	Vistry Group / General comment	Although Vistry Group is mindful that the Environment Bill has not yet been finalised and that further planning reform is awaited. As such, the Council should acknowledge some flexibility may be required to address emerging issues.	1 / Noted. The Environment Bill has now been enacted. Paragraph 1.2.4 notes that the SPD will in time be updated to support the Greater Cambridge Local Plan when this is adopted.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
15	2	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / Biodiversity Issue B5	Re: Section 5.5, Biodiversity Issue B5: Native Tree and Shrub Planting The SPD should be more specific on exactly what the GC expectation is on the use of native tree and shrub planting within developments. In Paragraph 5.5.8 there is reference to the planting of mixed native species hedging with trees to define boundaries in open countryside and there is reference to 'street trees' in Paragraph 5.5.27. It is suggested that something further within Section 5.5 under Biodiversity Issue B5 on species choice in planting schemes to emphasise the preference for native planting of species of local provenance and the more limited use of non-native ornamental species chosen to benefit wildlife.	6 / Noted. No amendment proposed. The detail of tree species is secured through landscape design based on suitability of tree species for a location, as well as their biodiversity value. As a rule, native species are favoured in more natural landscapes. Non-native species may also be appropriate where they are resilient to urban environments, the changing climate and pathogens.
259	2	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / Biodiversity Issue B5	Point 5 of policy requirements under Biodiversity Issue B5: 'That appropriate new wildlife habitats will be incorporated into landscaping schemes and the general layout of the built environment. All fencing will be expected to be hedgehog friendly and hedgehog highways should be incorporated throughout the development' The wording of 'appropriate new wildlife habitats' seems rather vague.	6 / Noted. SPD is not a Design Guide and habitats will need to be determined on a case-by-case basis.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
260	2	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / 5.5	Relevant Guidance in the GC Sustainable Design & Construction SPD There is some useful guidance on green infrastructure and trees in particular in the GC Sustainable Design and Construction SPD (2020) and it is suggested that there is a need to cross reference to this from the Section 5.5 under Biodiversity Issue B5 or to repeat some of the key elements of guidance. In the Section of the GC SDC SPD headed 'Adaptation Strategies– the role of green infrastructure' on pages 61 to 65 there is useful content relating to trees which could easily be 'lost' in a document of 262 pages! Paragraph 3.4.21 on page 62 starts 'The quality of trees to be retained and planted on site is an important consideration' One of the factors listed below that relating to 'quality' is 'The use of native species of local provenance where possible in order to maximise benefits for biodiversity' Further supporting information is provided with our related response to Question 4. 2.	6 / Noted. No amendment proposed. The detail of tree species is secured through landscape design based on suitability of tree species for a location, as well as their biodiversity value. As a rule, native species are favoured in more natural landscapes. Non-native species may also be appropriate where they are resilient to urban environments, the changing climate and pathogens.
261	2	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / 5.5	Re:Species Enhancement and Biodiversity Net Gain It is not clear how the species measures covered in the policy requirements under Biodiversity Issue B5 in Section 5.5 are to be assessed alongside the results of the Defra metric covered under Biodiversity Issue B7 in assessing overall net gain in biodiversity. In a recent interview on the BBC Countryfile programme, Dr Nick White of Natural England emphasised that the metric is one important factor in the overall consideration of biodiversity net gain but there must also be consideration of what is being done on species specific measures. We have concerns that with the focus within the context of biodiversity net gain being on the DEFRA metric, which is based only on green habitats, that there is a danger that	6 / Noted. Species specific measures are covered within Section B5. Species protection, mitigation and enhancement are considered separately in the planning process from BNG requirements and the associated metric.

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			important biodiversity opportunities for specific measures for species nest bricks, roosting bricks, hedgehog highways etc may be given less emphasis by developers. The significance of species-specific measures is emphasised by Government Guidance on the NPPF issued on 21 July 2019 (see below): https://www.gov.uk/government/news/brokenshire-orders-house-builders-to-protect-wildlife https://www.gov.uk/guidance/natural-environment Paragraph 23 of this Guidance headed 'How can biodiversity net gain be achieved?' includes at the end of the first sub paragraph 'Relatively small features can often achieve important benefits for wildlife, such as incorporating swift bricks and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat.' We suggest that the wording of the draft SPD be modified to emphasise the importance of species-specific measures within the umbrella of biodiversity net gain.	
20	2	Anglian Water / General comment	Targets and monitoring responsibilities – further details provided in email response.	2 / Noted. Refer to responses to email from this respondent. (Appendix E).
14	2	Cottenham Parish Council / General comment	There's a lot of what you want to do but not how it will be done	3 / Noted. The Councils consider that the SPD provides appropriate specific guidance informing applications while making relevant connections to

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
				legislation and contextual policy.
22	2	Hill Residential Ltd / General comment	The first 31 pages of the SPD simply repeat existing legislation, policy and guidance. It adds very little to the local context and what is required in order to help achieve biodiversity gain. The document should, working with the development industry, focus on practical examples and means as to how to achieve biodiversity gain. In doing so it needs to recognise that there is to be a transitional period before the 10% gain within the Environment Bill becomes mandatory (should it pass through parliament) and that any potential for higher gains needs to be established through the Greater Cambridge Local Plan process, not SPD. The SPD is unclear because it includes a raft of emerging policy and guidance as well as existing policy. If the document is to progress to adoption it must, by law, only supplement existing adopted development plan policy.	1 / Noted. The Councils consider that the SPD provides appropriate specific guidance informing applications while making relevant connections to legislation and contextual policy. A modification has been included to reference the transitionary period.
11	2	Individual - name provided / General comment	Almost all protection includes a clause saying that the habitat, trees etc. will not be destroyed unless there is over-riding benefit, however there is no indication what would constitute sufficient benefit to justify destroying irreplaceable ancient woodland etc	5 / Noted. No amendment. SPD sets out guidance against which proposals are considered.
12	2	Individual - name provided / General comment	Too long. Too much waffle. No sign of simple bullet points outlining sets of rules that the reader can absorb easily and quickly and relate to. There really is no way I am going to read all 72 pages in order to work out whether the Council is doing anything positive.	3 / Noted.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
13	2	Individual - name provided / General comment	There is some consideration of external dependencies, but they are, in effect, discounted undermining the logic and consistency of its assessment method and conclusions. On top of that the costs, trade-offs and options do not seem to be fully assessed.	1 / Noted.
17	2	Individual - name provided / 5.2.4	There is no box to tick which gives the answer I want, unfortunately. It is not that the guidance is not clear, it is that it is sometimes insufficient or wrong. In particular: section 5.2.4 emphasizes the value of CIEEM and its members. It is important to note that many consultants are not members of CIEEM, either because of the low values expected of its membership, disagreement with its guidelines, or both, and that many reports produced by CIEEM members are misleading or of poor quality; other sources of information should not be neglected	6 / Noted. Standards and benchmarking of professional qualifications (like CIEEM) are important, however where individuals can show capability and relevant expertise and experience this would be acceptable to the Local Planning Authority.
18	2	Individual - name provided / General comment	I haven't tried to look for a particular topic rather than simply read the document from top to bottom, but each section seemed to contain relevant information in a concise form.	5 / Noted.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
262	2	Individual - name provided / 5.4.1	Section5.4.1 suggests datasearch for protected and Priority species from the site boundary. Such a search is largely useless for detecting wildlife interest other than for vertebrates. Any search should include at least all species with any formal conservation status. Failure to do this could easily result in missing the presence of extreme rarities and species at their only known sites in the county. Priority lists are outdated and, for invertebrates especially, largely independent of actual interest. It is worth noting also that there is much information that CPERC do not have, or that they have not validated, and which therefore will not be supplied, and that they should not necessarily be regarded as the only source of information.	6 / Noted. The requested data search is the prescribed minimum desk top survey to inform a PEA. Professional judgement is required to interpret the data and appraise the site for likely species and necessary surveys, e.g. scarce plant or invertebrates on brownfield sites.
263	2	Individual - name provided / Appendix 2	Appendix 2 gives guidance on the timing of surveys. It suggests that preliminary ecological surveys can be undertaken at any time of year. They cannot if they are to be any good. Winter surveys can be extremely misleading. Such surveys should be undertaken during the growing season, and never in the immediate aftermath of management. The period for botanical surveys is given as June to August, with marginal opportunities in April, May and September. Communities with spring ephemerals are likely to peak in interest in April and may be perfectly surveyable in March; woodlands may be best surveyed in May, and all habitats are surveyable by the latter part of the month. No timings are given for invertebrate surveys: they should at least be included in general terms, and more specifically for obvious target groups such as aquatic invertebrates, butterflies, aculeates.	6 / Noted. Regarding preliminary ecological surveys - No amendments made. According to CIEEM guidance (Chartered Institute for Ecology and Environmental Management), a Preliminary Ecological Appraisal – used to assess if further surveys are needed - can be undertaken at any time of year. Further surveys would need to be done at the appropriate time.

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				Regarding botanical survey timings – no amendments made. The survey timings set out in Appendix 2 are at a high level; the botanical survey timings suggested are too detailed for an SPD. Regarding invertebrate surveys – agreed. Additional text added to state for invertebrates “Optimal survey time April to September"
24	2	L&Q Estates and Hill / General comment	Rather than comprising supplementary guidance, the draft SPD comprises a consolidation of adopted/ratified policy/legislation together with policy and legislation that is not adopted/ratified – presumably this is so that all information pertaining to biodiversity is available in the same place. We can see the merit in preparing such a document, but the fact remains, applications must be assessed against adopted policy and legislation, and should not be assessed against policy or legislation that has not been adopted/ratified. We therefore consider that consolidation of the information into one document is somewhat misleading and makes it difficult to isolate the advice that is genuinely supplementary. The information which is truly supplementary, particularly that which relates to net gain, appears very outline in nature and is lacking in detail as to how it	1, 2 / Noted. See other responses to specific comments made by this respondent.

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			can and should actually be implemented. It essentially boils down to three pages of background about net gain, together with Greater Cambridge's aspirations for sites to achieve a 20% gain, rather than the proposed 10% made by the UK government. The guidance on this, however, is limited and the wording seems to infer a 20% net gain will be negotiated when clearly the impact of either target has not been tested on development viability through the local plan process nor has it been tested for its impact on the capacity of sites and hence the Councils' housing and employment land supplies. Further evidence is required as to how the Councils' have assessed the costs and impacts of its proposed approach. We recommend that the wording of the SPD be reviewed in light of this issue to avoid misinterpretation. We also consider the SPD needs to give greater clarity and guidance on how biodiversity net gain should be implemented. By example, Cheshire East Council's equivalent SPD comprises a 35-page document, 25-pages of which detail exactly how BNG can be implemented by a developer, including up to a predicted fee for each biodiversity unit needing to be "purchased" where on site mitigation cannot be achieved.	
23	2	Madingley Road Area Residents' Association / General	It is a long document that I could only review quickly. Some of the links I checked did not lead directly to the information they signposted.	3 / Noted. Links have been checked in preparing the proposed final version of the SPD.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
19	2	Mott Macdonald / General comment	There is a lot of useful information contained in the SPD which brings together many important sources of information related to biodiversity in the Greater Cambridge area. However it treats all development as the same in terms of potential impact. I think the document would be much more useful if it was structured so there was advice for small developments (ie. private landowners), medium developments and major developments. Again if you referenced the EIA regs you could build on the schedule of EIA development to help developers understand where they fit in the scheme of things. At present the SPD would require a small developer (private landowner) to go through the same process as a major development like, say, East West Rail. So to ensure there was proportionality in planning applications (to ease the burden on both developer and planning authority) it would help if the SPD was structured to suit different levels of development as to their risk to biodiversity	4 / Noted.
21	2	Persimmon Homes East Midlands / General comment	Para 5.5.19 Doubling Nature Strategy states that 20% BNG can only be achieved through local planning policy or national, and this should be noted through the SPD that the strategy is also aspirational and not policy.	1 / Noted.
16	2	Individual - name provided / General comment	Too reliant on BNG metric, not enough on species. Need for more detail on habitats and planting to be created.	3 / Noted. The SPD is necessarily focused on the planning process and not design.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
33	3	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / Biodiversity Issue 5	Local Planning Authority should acknowledge that the housing market is increasingly becoming more aware of biodiversity opportunities and encourage developers to embrace this responsibility, which homebuyers are themselves encouraging. There is clear householder support for integral boxes for birds and bats. In conjunction with the RSPB, Sarah Roberts' research at the University of Gloucester has revealed evidence that houses with biodiversity opportunities for wildlife have become more attractive to buyers. Taylor Wimpey are working with local conservationists Action for Swifts in Cambourne and Northstowe to increase the ratio of integrated nest provision in their new brick built homes. For example, at Cambourne West 1.2, a parcel of 190 homes, Taylor Wimpey are installing 85 S Bricks, a universal integrated bird brick for Swifts and other small cavity-nesting birds. Although a smaller percentage (45%) than our recommendation (1:1), this is a significant improvement on previous development projects. Taylor Wimpey are also currently looking at a new in-house companywide biodiversity policy which includes considering a greater ratio of integrated nests per dwelling that would be higher than that required by the proposed new SPD.	6 / Noted. Biodiversity Issue B5 amended to reflect representation for additional integrated nest box provision.
38	3	Anglian Water / General comment	Need for clarity on targets and monitoring and consequent step up in targets and approach in new DPDs.	2 / Section 5.8 sets out the approach to management, monitoring and enforcement.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
36	3	British Horse Society / General comment	This document clearly supports the need for a good public rights of way network, the health benefit it provides and in particular, green corridors for their climate change benefits and carbon sequestration contribution. If Greater Cambridge is going to support this SPD then it needs to review its funding for rights of way in parallel. However, current local policy (e.g. the LCWIP) supports and encourages the creation of hard top / tarmac cycle paths. Increasingly, these paths are being created on existing bridleways and green paths e.g. • Rampton Byway – green corridor covered with motorway tarmac • Wilson's Road – bridleway width reduced and hard topped • Mere Way Byway – green path due to be covered with tarmac path up to 4.1 metres wide • Bridleway 143/1 and 2 Landbeach – due to be hardtopped for their full width. The damaging effect of the loss of the green paths, the amenity value for those wanting to use the RoW network for other than speedy cycling and for whom a soft surface is far better, the loss of carbon sequestration and the impact on nature and wildlife is not taken into consideration in the overwhelming rush to provide cycle paths at any cost. There are other surfaces which could be used. CCC Highways Department need to be willing to consider alternatives not simply to default to tarmac	6 / Noted. Points raised considered to be outside the remit of the Biodiversity SPD.
31	3	Cottenham Parish Council / General comment	City and South Cambs are different beasts so getting the policies to work for both could lessen their impact.	5 / Noted. The Councils consider that the SPD provides guidance appropriate to the whole Greater Cambridge area.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
40	3	Hill Residential Ltd / 5.5	Developments are already, or should be, delivering biodiversity enhancements. That has been national policy for a long time. The local plans also include a policy requirement for enhancement. Future legislation seems likely to mandate biodiversity gain, and to achieve that will adopt a new approach to the issue, by taking “habitat units” as a proxy for biodiversity. It is important to recognise that approach is different to much current practice in delivering enhancements and for example, will require much greater areas of land to be devoted to habitat provision. It is also important to recognise that the approach to biodiversity gain and its measurement remains draft and a number of parties, not just developers, but also the RSPB for instance, have concerns with the current Metric methodology and whether it is fit for purpose. The SPD does little to aide applicants in proposing biodiversity gains. The development industry has been delivering biodiversity gains as part of development for a significant period of time. Applicants are all too aware of the need to address the issue and to propose measures. What the SPD needs to do is focus on what are the priorities for biodiversity and providing practical guidance and advice rather than simply repeating material everyone is already aware of. The SPD identifies off-site measures as a last resort. However, it maybe that the maximum gain of biodiversity can be achieved by focussing on large sites where the more extensive areas of habitats can be created and re-wilding can take place.	2 / Noted. The Councils consider that the SPD provides appropriate specific guidance informing applications while making relevant connections to legislation and contextual policy.
26	3	Individual - name provided /	I think the timescales could be shorter and to provide more density of cover.	5 / Noted.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
		General comment		
27	3	Individual - name provided / General comment	It has got to be emphasised to all who apply for planning permission and then rigidly enforced by the Planning Committee and officers.	5 / Noted.
28	3	Individual - name provided / General comment	I've got no idea. It's simply too long.	3 / Noted.
29	3	Individual - name provided / 5.7	The two paragraphs on the Construction Stage is insufficient, given the scale of some projects in the area. I live in Northstowe and have been trying to work with SCDC and the contractors on wildlife on site during the build phase (timescale of a decade or more). The final plans may be fine, but there needs to be far more assessment between them being drawn up (2014?) and being implemented (now) and also for habitats created by the construction activity. First case is the phase 1 lake, dug in 2015 and left for 5 years. Trees grew and a very biodiverse "pre-development fallow" developed (rich in butterflies, moths and grasshoppers especially). Then the landscaping plans were implemented - many of the trees were not where the plans had trees, so they were cut down (in mid-April, with birds breeding) and the same or similar species planted elsewhere round the lake (the trees cut down were up to 20cm diameter trunks and were	2 / Noted. A Construction environmental management plan (CEMP) will guide the construction process. Section 5.7.2 captures the conditions for ecological management plans and Ecological Clerk of Works (ECoW). Larger phase developments should be mindful of ecological succession to ensure re-survey are undertaken every 2 years to guide phasing and

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			on the northeast side so had minimal shading or leaf-fall effects on the lake and shielded the area from the busway). The pre-development fallow land was inevitably impacted by instating the paths, but the seeding works led to the whole area being tilled, breaking every invertebrate lifecycle in the whole area. No continuity area was left to hold species while the new planting established. An assessment before plans were implemented could easily have identified these issues, saving biodiversity and money. Second case is the Phase 2 flood, which attracted Little Ringed Plovers and Avocets to breed (both schedule 1 and legally protected, several interesting but not schedule 1 species also present). There didn't seem to be any assessment of this area, with the contractors apparently being surprised they had Shelduck on site (considerably larger and more obvious than Little ringed Plovers, and they bred the year before as well). I tried to give information as to what was on site, but one Little Ringed Plover nest was almost certainly driven over by construction work (borderline illegal). These species were not present before construction so would not be identified in the main survey phase (but similar things happened with A14 works with Little Ringed Plover nests destroyed inadvertently, but protection is against intentional or reckless disturbance) There are other planning issues with Northstowe related to the timescale (eg full cycle paths will be instated after the first set of kids have already left the secondary school!) and for the rest of Northstowe, Waterbeach and other sites such as Bourn Airfield the within-build planning really needs addressing on, several fronts.	proposed planning application amendments.

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30	3	Individual - name provided / General comment	Without a more rounded assessment external pressures seem likely to overwhelm any groundwork laid in this SPD. The larger context, including the consequences of development pressure and the OxCam Arc, is essential to any realistic hope of achieving the required (and desired) outcomes	1 / Noted. The wider context referred to is outside the scope of the SPD.
32	3	Individual - name provided / 5.4	5.4 Pre application stage Could you include community or youth engagement within the planning process particularly for large residential developments. Good for educating the local community, taking ownership and understanding what measures have been undertaken and why. Money from applicants.	6 / Noted. Outside of scope of this SPD.
34	3	Individual - name provided / General comment	The real is yes, of course it will help, but not quite as much as it might. The real difficulty is that it pales into consideration of best practice and guidelines, and unless rigorously policed these don't work. Unless there is a mechanism for ensuring that practice is genuinely good, things will continue to slip through the net. None is stated	2 / Noted. Section 5.8 sets out the approach to management, monitoring and enforcement
35	3	Individual - name provided / General comment	I have high hopes for it, particularly if existing boundary hedges, unimproved grassland and trees are retained and varied habitat is introduced within the site. I think it would be even better if this was mandatory.	5 / Noted. It is not within the scope of the SPD to set new policy; rather it explains how Local Plan policies should be interpreted and applied and provides guidance.
43	3	Individual - name provided / 4.2	We are not clear if all locations of interest in the region have been considered in the report - in particular while the report mentions the area around Wimpole and the Eversdens there is no reference to the Bourn Brook Area or the Sweards areas which are both very important natural	3 / Noted. Wimpole and Eversden are specifically referenced due to their SAC status. Designation of new

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			environments for biodiversity in our parish. It is hard to tell if the SPD has considered the Bourn Brook valley area which is monitored by the wildlife trust in this report or if it has been overlooked	biodiversity sites and the overarching approach to their protection is outside the scope of the SPD. Evidence supporting the Greater Cambridge Local Plan has sought to identify all designated and undesignated biodiversity sites.
264	3	Individual - name provided / 5.5.5	5.5.5 Could this be divided into large development sites - residential and commercial and smaller scale developments or single houses. Large sites - include examples like ponds, infiltration ponds. marginal species. Log piles, bug hotels, diverse tree species. wildflower meadows bee friendly amenity mixes, orchards.	6 / Noted. No amendment. This format was considered; however, all development sites are required to deliver many of these features so discounted this approach.
265	3	Individual - name provided / 5.5.8	5.5.8 Not sure bank and low nutrient substrates would be used in garden extension. Need to add this to a different para.	6 / Agreed. Text moved to 5.5.7.
266	3	Individual - name provided / 5.5.9	5.5.9 owl boxes?	6 / No amendment. Point addressed by bird boxes.

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267	3	Individual - name provided / Section 5	Chapter 5.0 - what about soils? Protecting and managing when undertaking large earthworks.	6 / No amendment. Details of soil protection, movement and storage would be covered by a specific planning condition.
268	3	Individual - name provided / 5.5.9	5.5.9 Green Brown and blue roofs?	6 / No amendment. Covered in Biodiversity Issue B6.
269	3	Individual - name provided / 5.5.13	5.5.13 More needs to be added. Rain gardens, swales, infiltration ponds, rills all measures where biodiversity could be enhanced examples required.	6 / No amendment. Covered in design guides referenced in 5.5.14.
270	3	Individual - name provided / 5.8	5.8 Management programmes. Do you have good examples and add as an appendix? What do you expect to see in a management plan?	6 / No amendment. The specific requirements for Landscape and Ecological Management Plans will be defined within a planning condition based on the referenced BS42020.

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42	3	L&Q Estates and Hill / 5.5	We think the SPD needs to give greater clarity and guidance on how biodiversity net gain should be implemented. Once provided, this will give applicants a better steer on exactly how they can address biodiversity net gain within their proposals early on in the process. This is particularly important where additional compensatory land may be required or masterplan adjustments need to be made. If a 20% biodiversity net gain is sought this may render some schemes unviable and in turn reduce opportunities for development-led biodiversity improvements in the area. Seeking biodiversity net gain on existing sites/commitments may prove difficult especially where a 10% net gain was not factored in at Local Plan testing stage. The SPD cannot impose any specific percentage net gain as that is a policy decision. Therefore, in order to achieve the objective of doubling nature in future, the Council will need to look at large scale sites where it may be possible to achieve more significant levels of biodiversity net gain through comprehensive rewilding proposals and ecological enhancements. We have promoted such a site to the draft Greater Cambridge Local Plan consultation (Form ID 40078), which comprises c.8,500 homes and an expansive wildlife area at Six Mile Bottom ('Westley Green), all within one ownership. Development at this scale can make a significant contribution towards both the Council's 'Doubling Nature' objective and its Strategic Green Infrastructure Network	2 / Noted. The emerging Greater Cambridge Local Plan is exploring delivery of net gain including via strategic projects – this issue is outside the scope of the SPD.

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41	3	Madingley Road Area Residents' Association / 3.4	The Area Action Plans I looked up quickly are quite old and could probably do with updating (e.g. North-West Cambridge). It seems it is still up to a developer to access the existing biodiversity of a site. It seems in their interest to establish as low a level as possible. In the past we have seen low biodiversity or environmental importance reported in planning applications for sites where we as neighbours are aware of much more.	6 / Updating Area Action Plans is outside the scope of the SPD.
37	3	Mott Macdonald / General comment	The draft SPD is unclear how the various biodiversity strategies listed in the SPD work – and who would actually take responsibility for delivery of these strategies. We believe some better guidance on this key issue is important, or developers will find it difficult to know who to talk to, and where they will gain the most benefit for themselves. Experience of trying to engage with some of the parties mentioned in the SPD is that no-one who has produced the various plans listed, or who is promoting the listed strategies takes an active role in delivery, largely because they are not the land owners and so cannot make decisions on what is done. It seems to be left to developers to do something somehow. However, there is clear need for a governing body to be clearly identified who is responsible for making these strategies and plans a reality. At present there is no clarity on how a developer will help to achieve the positive outcomes required by legislation and the local plans. Even if developers do something locally there is nothing in the SPD to indicate who will make sure individual developer action resulted in some form of integrated or coordinated programme that delivers the strategies/plans etc. We believe the local authorities need to take a bold and positive step to taking	2 / Delivery of biodiversity strategies is outside the scope of the SPD. Through the preparation of the Greater Cambridge Local Plan the Councils are engaging with relevant partners to progress this issue.

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			ownership of biodiversity net gain initiatives – this is going to be absolutely vital if long term BNG management is to be managed through planning mechanisms such as S 106 agreements. If this does not happen then moneys set aside for BNG delivery will sit unused and eventually returned to the developers – with the result that no benefits arise for BNG. We think the SPD could benefit by providing links to other SPDs that have complimentary objectives in relation to landscape character, water resources and flood risk and minerals planning (for example)	
39	3	Persimmon Homes East Midlands / General comment	The SPD highlights the 20% requirements however this is not in line with current policies. The SPD should note the requirements should meet those in the most up to date versions of the Environment Bill and the Local Plan. The SPD is useful to encourage net gain, however, requirements of net gain should be assessed through a local plan adoption process due to the significant impacts on viability which can only be appropriately tested through this format.	1 / Noted.
46	4	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / Case study	Suggested Case Study from Cornwall Planning for Biodiversity Guide Integral nest boxes, Duchy of Cornwall Site at Nansledan. Page 59 Section 13.3 Cornwall planning for Biodiversity Guide - Cornwall Council An update on this project is available on the RSPB website: https://www.rspb.org.uk/our-work/rspb-news-original/news/stories/the-duchy-of-cornwall-giving-swifts-a-home/. Also, the Duchy of Cornwall is supporting a project to monitor the species that take up these new nest places on sites including Nansledan.: https://www.rspb.org.uk/our-work/rspb-news/news/stories/the-big-birdbox-	3 / Noted. Examples of good practice and design case studies will be shared on the GCSP website.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
			survey/%20Action%20for%20Swifts:%20Duchy%20Big%20Bird%20Box%20survey%20202.	
47	4	British Horse Society / Case study	Developments such as Cambourne with it's rural green bridleway, Cambourne West with its promised peripheral bridleway network and links into other rights of way, Bourn development again with the RoW network for all designed in from the outset, the plans for Waterbeach and Alconbury - a new RoW network for all with links to the existing. Small gains but ones which instil a healthy lifestyle within the community, give pleasure and hopefully, develop into the type of community in which people can live happy, healthy, sustainable lives	3 / Noted. Examples of good practice and design case studies will be shared on the GCSP website.
49	4	L&Q Estates and Hill / Good practice	Please see Cheshire East Council's equivalent SPD (April 2021). https://moderngov.cheshireeast.gov.uk/ecminutes/documents/s85129/Biodiversity%20Net%20Gain%20Draft%20SPD.pdf	3 / Noted. Examples of good practice and design case studies will be shared on the GCSP website.
45	4	Individual - name provided / Case study	No. I think almost all the cases I am aware of have resulted in net loss of biodiversity and usually for the same reason - the pressures exerted by the larger context were never properly considered.	5 / Noted. The SPD's intention is to enhance guidance interpreting policy, to improve the biodiversity outcomes associated with development. The wider context is outside of the scope of the SPD.

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48	4	Mott Macdonald – Case study – Good practice	Not yet – this is an emerging area and all the engagement we have had with local planning authorities has left delivery of BNG to developers. The key challenges that need to be met are as much how to ensure long term management is delivered. We are aware of the County's own proposals to establish a landbank for developers to buy BNG credit through, and the County will then be responsible for ensuring the delivery of this. But for developers who include appropriate BNG in their proposals, how is the long term management over 30 years going to be made a compulsory requirement? If this is through S106 payments the burden then simply shifts to the County (or other planning authority) who may well struggle to ensure the management happens. In this case the BNG commitments of the developer will fail to materialise. It would be useful for the County to examine how HS2 Ltd are approaching this and possibly to enquire how Heathrow were planning to deliver long term BNG management.	2 / Noted.

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58	5	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / 5.5	We Like the Following Aspects of Section 5.5 1.Hedgehog Friendly Fencing, Biodiversity Issue B5 Point 5 of policy requirements under Biodiversity Issue B5 states: 'That appropriate new wildlife habitats will be incorporated into landscaping schemes and the general layout of the built environment. All fencing will be expected to be hedgehog friendly and hedgehog highways should be incorporated throughout the development' The expected provision of hedgehog friendly fencing is welcome but it is of course only one part of a species saving solution: https://www.hedgehogstreet.org/. 2.Figure 9, 'Integrated Nesting Habitat for Birds or Bats', Biodiversity Issue B5 This Figure entitled 'Integrated nesting habitat for birds or bats', is a photo showing integrated swift bricks with the legend indicating that these bricks can be used by other species such as house sparrow. We do not recommend the sparrow terrace designs as they attract few sparrows, who prefer the integrated swift bricks. This is an important point that is often not appreciated by consultant ecologists working for developers. Perhaps it needs to be highlighted by inclusion within the text as well. 3. Comment on Integrated Boxes, Biodiversity Issue B5 Paragraph 5.5.9 of Biodiversity Issue B5: 'In addition, the provision of integrated boxes (a combination of bird, bat & insect boxes) will be required in new buildings for all types of development and should target protected, Priority and other species	6 / Noted. B5 wording amended to reflect comments.

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			associated with the built environment, such as Swift, as promoted by Action for Swifts, house sparrow, starling and pipistrelle bats. Where appropriate, high quality, durable boxes can also be provided on retained trees within the public realm'. We appreciate the specific mention of swifts here and the reference to Action for Swifts. As noted above, integrated swift boxes can be used by other species such as house sparrow and perhaps this should be mentioned here. We have some comments on the use of boxes in trees, which we think should be limited, and these are included under our 'We Do Not Like' points below. We Do Not Like the Following Aspects of Section 5.5 A. Nest and Roost Boxes in Trees It is not considered a sustainable practice to place boxes in trees on new housing developments because of the problems of long-term maintenance and they are vulnerable to vandalism, degradation and decay. Integral boxes within the building structure are strongly to be preferred rather than those fixed externally to the walls, as these would need longer term maintenance and their appearance can deteriorate relatively quickly. Exceptions could be for specialist species such as owls and certain bat species where boxes made of durable materials should be securely fixed into healthy mature trees in wooded areas. B. Proposed Provision Level of Nesting/Roosting Sites, Biodiversity Issue	

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			B5 Our main concern is that the level of nest brick/roosting brick provision is no better than that in the existing SCDC Biodiversity SPD, which was produced way back in 2009. Since then, the standards for such provision have moved on such that good practice now is for the provision of one nest brick per dwelling, with the provision for roosting bats and insects being additional to this as appropriate to the site based on surveys and habitats present (details below). In the Draft SPD under 'Biodiversity provision in the design of new buildings and open spaces': 'To meet policy requirements (HQ/1, NH/4, Policy 57 and Policy 59), the councils will expect: Point 2: 'That on all major housing developments 50% of the dwellings/units will have features such as integrated bird, bat or insect boxes provided in close association with the properties. On all other sites suitable provision for biodiversity enhancements shall be negotiated to achieve a similar standard'. This is particularly disappointing in the context of the statements in the Introduction Paragraph 1.1.2 in which it is stated that: …'Both Cambridge City Council and South Cambridgeshire District Council have declared a biodiversity emergency, and strongly support a step change in the protection and enhancement of biodiversity in Greater Cambridge'. This issue is particularly important because cavity nesting birds, which have nested for generations in older houses in holes and cavities under the eaves and in walls, are in dramatic decline – sparrows and starlings are Red Listed and although swifts are only Amber	

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			Listed this is on a technicality as data is required over 25 years and at the time of the last assessment this data was not available for swifts. Swifts have declined at an average rate of 5.4% per annum over the last 10 years and by 60% in the last 25 years, so we anticipate that the swift will move from the Amber to the Red list at the next BoCC revision expected in December 2021. We strongly suggest that in Biodiversity Issue B5: the level of bird nest brick provision be increased to 1 per house and 1 per 2 flats in line with current good practice. the level of bat roosting bricks be addressed separately and at the rate suggested in the Oxford City Council Guidance (reference below) subject to site location and features suitable for foraging. Pollinator provision be addressed mainly through planting schemes. Levels of provision of nest and roosting bricks for all types of building such as schools, student accommodation, hotels and offices be addressed rather than just the general 'all commercial applications' in point 4 of the expectations under Biodiversity Issue B5. Decline of Cavity Nesting Birds The decline of swifts and other birds in the urban environment is highlighted in a recent report – the Environment Agency, Chief Scientists Group (2021) The state of the environment: the urban environment: The state of the environment: the urban environment - GOV.UK (www.gov.uk) One big factor in the decline of swifts, sparrows and starlings is likely to	

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			be the loss of nesting sites through building renovation and insulation and more rigorous standards in new build homes. The inclusion of special nest bricks/integral boxes in all new houses is therefore an important step in helping to halt this decline. As noted in Figure 9 in Section 5.5, Biodiversity Issue B5 on page 43 of the Draft SPD integrated boxes designed for swifts will also be used by other birds such as house sparrow thus acting as a 'universal nest box'. Currently Accepted Good Practice At least a 1:1 ratio of nest bricks per dwelling is generally accepted now as good practice – a level of provision outlined in the award-winning Exeter City Council Residential Design Guide SPD (2010). Stephen Fitt of the RSPB South West Regional Office has been working with Exeter Planners over a period of 10 years on the implementation of the biodiversity requirements of this guide and there is acceptance that in many cases the most suitable box type for all cavity nesting birds is the swift brick. A number of planning authorities have adopted similar guidelines – for example Oxford (see details below), Cornwall, Brighton and Plymouth and South West Devon. A similar standard was adopted by the Town and Country Planning Association and the Wildlife Trusts in 2012 (reference below) and The Royal Institute of British Architects (RIBA) in 2013 (reference below). Planning for a Healthy Environment; Good Practice for Green Infrastructure and Biodiversity. The Town and Country Planning Association and The Wildlife Trusts (2012)Gunnell, K., Murphy, B. and Williams, C., Designing for Biodiversity: A technical guide for new and	

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			existing buildings, RIBA Publishing & Bat Conservation Trust (2013). The Duchy of Cornwall adopted the same principle of one nest site per dwelling in 2015, and a good example of the provision of a general type of integral box for all cavity nesting birds is the Nansledan development by The Duchy of Cornwall in Newquay: https://www.rspb.org.uk/our-work/rspb-news-original/news/stories/the-duchy-of-cornwall-giving-swifts-a-home/ An excellent recent report produced by the NHBC Foundation from a collaboration between the RSPB and Barratt Developments gives significant guidance on these issues on page 42 onwards, which includes providing nest sites at a rate of one per house: 'Provision of integral nest sites for swifts is through hollow chambers fitted into the fabric of a building while in construction. Although targeting swifts they will also be used by house sparrows, tits and starlings so are considered a 'universal brick' and 'Fitting at a ratio of 1 nest brick per house across the development will ensure sufficient nest sites for colonial species. 3-5 can be located in one house, so helping locate them in suitable locations for access to foraging habitat' NHBC Foundation, Report NF 89, 'Biodiversity in new housing developments: creating wildlife-friendly communities' (April 2021). Available at: Biodiversity in new housing developments: creating wildlife-friendly communities - NHBC Foundation Our own local projects with developers (e.g. Taylor Wimpey and Hopkins Homes) at Northstowe, Cambourne West, Melbourn and elsewhere indicate an increasing willingness by some of them to engage on integral nest box projects and so we strongly suggest that the guidance on the level of	

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			integral nest site provision be increased in line with current good practice. Example from Oxford City Council Guidance. Within the OxCam Arc, Oxford City Council are leading the way with guidance on this issue. The recent Oxford City Council Technical Advice Note 8 on Biodiversity – Planning Application Guidance gives an 'expected provision' of bird nest sites in line with recommended good practice and additional provision of roost sites for bats and features for pollinators. https://www.oxford.gov.uk/info/20067/planning_policy/745/planning_policy_-_technical_advice_notes_tan In Section 12, 'Ecological Enhancement', under the heading 'Artificial Nest/Roost Site' on page 32 it states: 'Installing artificial nesting and roosting sites for birds and bats is good practice as part of any development and such provision will be expected unless there are good reasons why such features cannot be accommodated in the design…. Table 1 below provides details of the expected box provision for building-dependent birds, bats and also for pollinators that are expected for various development types' In the Oxford City Council document Table 1 entitled 'Expected provision of artificial features for different types of development' gives an 'expected provision of bird nest sites for building dependent birds' at a rate of 1 per house and 1 per 2 flats, with separate provision for 'bat roost sites' at a rate of 1 per 5 houses and 1 per 10 flats.	

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			Provision of such artificial features in schools, student accommodation and hotels is addressed by a ratio of 1 bird nest site per 250 m2 floor space and 1 bat roost site per 500m2 floor space. There is additional guidance for 'pollinator provision' based on '1 bug hotel per 5 houses plus 25% of soft landscaping designed to provide nectar sources' and '1 bug hotel per 10 flats plus 25% of soft landscaping designed to provide nectar sources' On page 32 of the Oxford City Council document, it is noted that: 'Internal bricks and voids are less visually intrusive than external boxes. They are also more likely to be retained in the development long term and require less maintenance'. We conclude that provision of integral boxes, such as swift boxes, at a ratio of at least 1:1 per dwelling is the modern standard to accommodate a range of cavity nesting birds in new developments. Swift Bricks as Universal Nest Bricks Swift bricks or boxes are frequently used by other cavity-nesting small birds such as house sparrows, starlings, great tits and bluetits and occasionally tree sparrows and house martins. We refer to two articles on this subject: actionforswifts.com/2020/12/swift-bricks-universal-nest-brick.html Swift Bricks: The 'Universal' Nest Brick – by Dick Newell | CIEEM	

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			At a Duchy of Cornwall development at Tregunnel Hill in Newquay, where an average of 1 swift box per residential home was installed, within a couple of years one third of the boxes were occupied by sparrows together with a pair of swifts:https://www.rspb.org.uk/our-work/rspb-news-original/news/stories/the-duchy-of-cornwall-giving-swifts-a-home/ https://www.rspb.org.uk/our-work/rspb-news-original/news/stories/the-big-birdbox-survey/ Sparrow boxes are smaller and usually produced as 3 nest chambers in one unit (sparrow terrace) – these are too small to be used by swifts or starlings – and there is evidence that they are rarely used by more than one pair of sparrows. Occupation by a single pair of great tits or bluetits is more common. While they are colonial breeders, single boxes at least a metre apart may be preferable for both sparrows and swifts. We conclude that swift boxes are the nearest there is to a general-purpose bird box for small cavity-nesting species including house sparrows, starlings, blue tits, great tits and occasionally other species such as house martins and tree sparrows. (Reference https://actionforswifts.blogspot.com/2020/12/swift-bricks-universal-nest-brick.html Summary - We strongly suggest that in Biodiversity Issue B5 the level of bird nest brick provision be increased to 1 per house and 1 per 2 flats in line with current good practice. The level of bat roosting bricks be addressed separately and at the rate suggested in the Oxford City Council Guidance subject to site location and features suitable for	

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			foraging. Pollinator provision be addressed mainly through planting schemes. Levels of provision of nest and roosting bricks for all types of building such as schools, student accommodation, hotels and offices be addressed rather than just the general 'all commercial applications' in point 4 of the expectations under Biodiversity Issue B5. C. Bird/Bat Boxes on Smaller Developments in Biodiversity Net Gain, Biodiversity Issue B7 In paragraph 5.5.28 'For smaller developments (fewer than 10 residential units or an area less than 0.5 hectares) and householder applications' In the last sentence of this paragraph: 'However, until legislation and further guidance is available, small sites should aim to meet the details of B5 above with at least one integrated bird, bat or insect box, hedgehog friendly fencing and habitats as listed in 5.5.4 above'. This wording is not clear in the context of Point 3 of the 'expectations' under Biodiversity Issue B5: 'For minor and householder development, each dwelling/unit will have at least one integrated feature appropriate to the location of the development'. Hedgehog friendly fencing and any green infrastructure would be in addition to that. We strongly suggest that the wording of Paragraph 5.5.28 be amended so that it is consistent with the 'expectations' in Biodiversity Issue B5. Infill developments can contribute significantly to local biodiversity	

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			enhancements. Small local developments, advised by Action for Swifts, include 6 houses in Haddenham with 12 Swift bricks and a second one with 6 houses in Wilburton with 18 Swift bricks. D. Swifts and Ecological Assessment Reports in Section 5.4 Pre-application Stage Within Paragraph 5.4.9 referring to Preliminary Ecological Assessment Reports: 'Identifying important ecological resources at the outset and avoiding impacts on them will limit the loss of biodiversity and reduce the need for mitigation and compensation measures. In many cases these reports will include recommendations for further survey, particularly in relation to protected and priority species'. Under Section 4.6 'Red List Species'. While the swift is not included at present in the UK Red List, which would normally have it included in the Priority Species List for Cambridgeshire, swifts have declined at an average rate of 5.4% per annum over the last 10 years and by 60% in the last 25 years, so we anticipate that the swift will move from the Amber to the Red List at the next BoCC revision expected in December 2021. However, it is on a 'Cambridgeshire Additional Species of Interest' list: Within Paragraph 4.6.2: 'There is no Cambridgeshire Red List, but there is a list of Additional Species of Interest, which provides comparable information …' It is not clear whether there would be any requirement for consideration for swifts as a 'priority species' under the wording of paragraph 5.4.9	

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			referred to above. However, in the Greater Cambridge Sustainable Design and Construction SPD in Section 3.5 'Biodiversity and Geodiversity' under the heading 'Submission requirements' in Paragraph 3.5.4: '…For developments that will either directly or indirectly impact a designated site of biodiversity or geodiversity importance, or a protected species or a priority species or priority habitat, a Ecological Impact Assessment and Protected Species Survey will need to be submitted with the application. This includes refurbishment works which may impact species using the existing building such as bats and swifts….' We suggest that wording be inserted in the Draft Biodiversity SPD within the survey section in line with this wording in the GC SDC SPD. At present Appendix 2 headed 'Guidance on protected species and ecological survey seasons' doesn't really cover this appropriately as under 'Breeding birds' it states: 'Six survey visits across the season from March to June. Marginal opportunity in July' This is important as swifts have a short breeding season between May and July and, as noted in the document 'Swift Bricks – the universal nest brick' produced by the Swifts Local Network, even if the survey is undertaken during this period 'they are elusive birds who enter and leave their nest sites in the nooks and crannies of buildings in the blink of an eye and so nest sites are very easy to overlook' To have a good chance of detecting the presence of swifts, it is important to do the survey at the right time of year and at an optimal time of day: between early June and mid July and during the last 1.5 hours of daylight.	

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			Ecologists would need to refer to information on 'Swift Mapper': https://www.swiftmapper.org.uk/ Also, they should consult the local volunteer conservationists including Action for Swifts, who have a wealth of local knowledge, in addition to any reference to records held by the Cambridgeshire Environmental Records Centre.Contact details are available through the Action for Swifts website. E. The Lack of Focus on Planting of Native Species, Biodiversity Issue B5 We are not sure that the SPD makes clear what the GC expectation is on the use of native tree and shrub planting within developments. Point 5 of policy requirements under Biodiversity Issue B5: 'That appropriate new wildlife habitats will be incorporated into landscaping schemes and the general layout of the built environment. All fencing will be expected to be hedgehog friendly and hedgehog highways should be incorporated throughout the development'. The wording of 'appropriate new wildlife habitats' is rather vague. In Paragraph 5.5.8 there is reference to the planting of mixed native species hedging with trees to define boundaries in open countryside and there is reference to 'street trees' in Paragraph 5.5.27. Relevant Guidance in the GC SDC SPD - There is some useful guidance on green infrastructure and trees in particular in the GC Sustainable Design and Construction SPD (2020) and it is suggested that there is a need to cross reference to this from the Section 5.5 under Biodiversity Issue B5 or to repeat some of the key elements of guidance. In the Section of the GC SDC SPD headed 'Adaptation Strategies– the	

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			role of green infrastructure' on pages 61 to 65 there is useful content relating to trees which could easily be 'lost' in a document of 262 pages! Paragraph 3.4.21 on page 62 starts 'The quality of trees to be retained and planted on site is an important consideration' One of the factors listed below that relating to 'quality' is 'The use of native species of local provenance where possible in order to maximise benefits for biodiversity' It is suggested that something further within Section 5.5 under Biodiversity Issue B5 on species choice in planting schemes to emphasise the preference for native planting of species of local provenance and the more limited use of non-native ornamental species chosen to benefit wildlife. Landscaping Close to Homes for Bird Shelter Also, it is important to retain and provide quality native species green infrastructure (as opposed to miniature ornamentals) in the area immediately around new houses rather than houses being marooned in an area of largely hard landscaping separated from islands of higher value green space around the edges. On many new housing developments, the landscaping close to homes tends to consist mainly of miniature ornamentals. However, the enrichment of the habitat with some native species close to homes will attract a wider range of birds into gardens. For sparrows in particular hedges and shrubs for shelter are very important close to potential nest sites, such as new nest bricks. This would also provide a more pleasant environment to support the health and wellbeing of residents. There is some good guidance on these issues in the NHBC Report mentioned below. We suggest that there should be	

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			some reference to the need for native green infrastructure to be included in landscaping close to homes within Section 5.5 Biodiversity Issue B5. Supporting information An excellent recent report produced by the NHBC Foundation from a collaboration with the RSPB and Barratt Developments gives significant guidance on these issues on page 29 onwards. NHBC Foundation, Report NF 89, 'Biodiversity in new housing developments: creating wildlife-friendly communities' (April 2021). Available at: Biodiversity in new housing developments: creating wildlife-friendly communities - NHBC Foundation The following taken from Section 12 on page 31 of the Oxford City Technical Advice Note 8 gives an example of what another Planning Authority has included: 'Give consideration to species choice in planting schemes: Seeds and plants should be from a Flora locale recognised source: see www.floralocale.org. While native planting of species of local provenance is encouraged, where ornamental planting is required give thought to species choice to benefit invertebrates. The Royal Horticultural Society 'Perfect for Pollinators' lists provide excellent advice on planting with pollinating insects in mind' https://www.oxford.gov.uk/info/20067/planning_policy/745/planning_policy_-_technical_advice_notes	

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61	5	British Horse Society / 3.7.8	3.7.8. Change of use applications can bring benefits if properly planned and sensitively managed. The use of grassland sites by horses for equestrian purposes can sustain their botanical interest. However, there is also much potential to damage the interest of grassland sites through overgrazing. Over-grazing may lead to the proliferation of certain undesirable species, increased soil erosion, and diffuse pollution. Development proposals for stabling or for Change of Use to paddock land will be subject to ecological assessment based on the likelihood of protected and Priority species being present and affected, as well as impacts on the local landscape character. Poor management can result in overgrazing by all sorts of livestock. There are stocking standards clearly stated by the British Horse Society and British Horseracing Association. If there is a requirement not to exceed these standards that should be sufficient. The cost of an ecological survey could be prohibitive for a private horse owner and could be a barrier to keeping a horse. The benefits of horse riding, the majority of horse riders are female, for women is well documented. It would be wrong to create a barrier which would impact far more on females (a protected characteristic under the Equality Act) when there is an opportunity to achieve the same outcome simply be requiring stocking standards to be met	6 / Noted. In order to prevent damage to potentially high biodiversity value grassland through inappropriate grazing it is deemed proportionate to request a professional survey where planning matters will impact on future management.
56	5	Cottenham Parish Council / General comment	It's a very weighty document and therefore not very user friendly/accessible. Also City and South Cambs are very different so not sure the policies will work for both. May want to consider having a village-focussed executive summary to aid use of the document	3 / Noted. The Councils consider that the SPD provides guidance appropriate to the whole Greater Cambridge area.

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66	5	Hill Residential Ltd / General comment	Firstly, the SPD seeks to introduce new policy and subvert the development plan process. Local plans have been put in place and have tested the capacity and viability of sites based on the policies within them. An arbitrary, untested, addition of either 10% or 20% (or any other specified amount) does not accord with the tested local plans, legislation nor national policy. The SPD does little to offer practical guidance as to how biodiversity gain can be achieved. It simply tells people they need to achieve it, a matter which is well enshrined in policy. The SPD and its accompanying SEA do not robustly consider its potential ramifications. It seems to assume that there are no consequences of the approach. The SEA states that the approach would have no effect on human population. However, net gain in habitats area will increase land take, resulting in fewer homes per site and hence more sites and more land being needed to be released to meet identified development needs. Fewer homes being accommodated on a site will increase the cost of land and impact on house prices and affordability. There is no assessment of how much land take will be required for the approach. If that results in access to housing being worsened, with a reduced land supply or development rate, then that will have a negative impact on mental well-being and health as it is well-established that access to good quality, affordable, housing is a major determinant of people's health and well-being. Greater land take for habitat and development means the loss of more agricultural land to development. Not only does that result in the loss of productive land for food growing but impacts on the habitat of farmland birds. The SPD appears to treat this as an singular issue. The implications of the SPD	1 / Noted. As addressed by the theme response, and elsewhere in this response to comments. The SPD does not seek to make local plan policy, but does seek to encourage opportunities to be taken to enhance biodiversity.

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			need to be tested for their impacts on viability of development and capacity of sites. Without that the document cannot be considered sound or to supplement existing policy. Any assessment of costs needs to consider not only the establishment costs, but the ongoing maintenance costs. An assessment if needed as to the impact on land take.	
52	5	Individual – anonymous / General comment	I liked the layout and language of the document	5 / Noted.
53	5	Individual - name provided / General comment	I would have liked to have seen location information for the photographs.	6 / Noted. Location information for photographs added.
54	5	Individual - name provided / General comment	It's long and doesn't appear to have handy summaries of clear and concise points which indicate the Council can and will do positive things. I don't want to read 72 pages	3 / Noted.
55	5	Individual - name provided / General comment	It sets out with good intentions so that is a positive. It then, sadly, let's itself down by being too narrow in its considerations and ignoring inconvenient truths	5 / Noted.

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57	5	Individual - name provided / General comment	Good examples required	3 / Noted.
59	5	Individual - name provided / General comment	Too much reliance on existing policies, guidelines, etc; not enough independent thought or detail	5 / Noted. It is not within the scope of the SPD to set new policy; rather it explains how Local Plan policies should be interpreted and applied and provides guidance.
60	5	Individual - name provided / General comment	The structure was good, and if everything in it is actually done we will all benefit.	5 / Noted.
68	5	Individual - name provided / 4.2	It was very difficult to identify when areas had been considered for their impact regarding biodiversity and planning and when they were not. A list of locations considered has been highlighted for major sites e.g. Wimpole however a longer list with more detailed information would have been helpful. It may be that as the Bourn Brook Valley area and the Sweards do not fall into a specific category (SPA, SAC or RAMSAR sites) and they have been overlooked but is hard to tell from the report if this is the case. We would like both these areas to be included in any study by South	3 / Noted. For succinctness not all areas of existing habitat value have been mapped or referenced. Designation of biodiversity sites and the overarching approach to their protection is outside the scope of the SPD. Evidence supporting the

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			Cambs into biodiversity in relation to the current situation and also future planning and development	Greater Cambridge Local Plan has sought to identify all designated and undesignated biodiversity sites.
67	5	L&Q Estates and Hill / Biodiversity Issue B7	The information which is supplementary is buried amongst information which is not supplementary. The SPD does not provide material guidance on how to meet net gain requirements in Cambridgeshire, even though large schemes are likely to require significant local authority input. Further, it requests a 10% increase over the likely national requirement without providing meaningful justification for why this is necessary, why developers should foot the bill for this, or that it has been tested as a viable proposal. It overlooks the significant opportunities for improvements to biodiversity that could be achieved by promoting a 10% gain, and the risk of losing these opportunities by making proposals unviable. We would reiterate here that the SPD cannot create policy and specific net gain targets need first to be tested through the Local Plan process.	1 / Noted. As addressed by the theme response, and elsewhere in this response to comments. The SPD does not seek to make local plan policy, but does seek to encourage opportunities to be taken to enhance biodiversity.
63	5	Mott Macdonald / General comment	There could be much better flagging of case studies – eg. the link to the Building with Nature could include reference to this site providing case studies that could help developers.	4 / Noted.

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271	5	Mott Macdonald / General comment	There needs to be a schedule of increasing risk to biodiversity – and thus what in the SPD is relevant to those developments which pose no real risk to biodiversity – again we are thinking of those private householders and not commercial developers.	6 / Noted. Protected species, BNG legislation and local policies apply to all development types and sizes. The constraints and opportunities for a site are defined by the initial Preliminary Ecological Appraisal.
272	5	Mott Macdonald / General comment	We believe there are risks associated with climate change and demands for water that will (already are) impacting biodiversity (eg. the River Cam catchment being overabstracted with impacts on the ecological status of the river system). These risks need to be flagged more to ensure a holistic approach to biodiversity is achieved.	6 / Noted. This is an SPD which provides practical advice and guidance on how to develop proposals that comply with the NPPF and the district-wide policies. The emerging Greater Cambridge Local Plan policies will seek to address a changing climate and its effects on biodiversity.
273	5	Mott Macdonald / General comment	Similarly, there is little linking cultural landscapes (character) with biodiversity challenges and opportunities. Particularly around historic settings the cultural landscape is often closely linked to biodiversity (Wicken Fen, the Magog Downs for example). We believe this link should be highlighted.	6 / Noted. 3.6.10 references the five National Character Areas with a link that includes detail on their cultural significance.

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274	5	Mott Macdonald / General comment	One of the objectives set out in Chapter 1 is to explain the terminology for non-professional developers. Yet in the section on Permitted Development there is a lot of terminology related to various planning procedures which are not defined. The document really needs a glossary of terms – this would help meet one of the four objectives.	6 / Noted. It is considered that terminology is explained within the body of the SPD text, negating the need for an additional glossary and increased length of document.
275	5	Mott Macdonald / General comment	As mentioned previously the relationship between Ecological Impact Assessment and full EIA needs to be better covered in the SPD.	6 / Noted. No amendment. The EIA regulations require a separate scoping process and guidance for eligible development proposals
62	5	Northstowe Town Council / General comment	• Northstowe Town Council (NTC) notes this document; • NTC supports the principles set out in the document, and wishes these principles reflected in all planning applications coming forward and applied in all developments stemming from these. • NTC requests a response to obtain a better understanding how this document is to be updated and kept up to date in the future, in particular regarding: - Future changes in National, Regional or Local Policies; - Improvements in understanding of the biodiversity and biodiversity value within the area.	5 / Noted. Paragraph 1.2.4 of the document notes that the SPD will be "updated to support the Greater Cambridge Local Plan when this is adopted", at which point changes in legislative or evidence context will be taken into account.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
65	5	Persimmon Homes East Midlands / 5.5.24	Para 5.5.24 should amend the word 'required' to 'encouraged' as it is not within the policy. Para 5.5.26 should amend 'is likely to be needed' to 'will be encouraged' due to its ambiguity.	6 / Noted. 5.5.24 relates to actions needed to deliver the Doubling Nature vision rather than specific development requirements, and as such has not been amended. 5.5.26 amended to state that "a value of 20% is likely to be encouraged as best practice".
277	5	Persimmon Homes East Midlands / 5.5.30	Para 5.5.30 should state that requirements to be in line with the Environment Bill. All other comments have been made in reference to questions 2 and 3.	6 / Noted. Environment Bill now enacted.
50	5	Vistry Group / 5.5.18 – 5.5.26	In paragraphs 5.5.18 - 5.5.26 the draft SPD explains the Biodiversity Net Gain (BNG) requirement of 10% in Environment Bill and the Council's Doubling Nature Vision which seeks a 20% level of Biodiversity Gain. The SPD states that while it does not set this as a figure or fixed target, this aspiration may have further support with the future enactment of the Environment Bill.There is a risk that the SPD could introduce ambiguity for Councillors, developers and the public on the level of BNG that the Council will require. This could lead to delays in sites coming forward for development and the delivery of houses, including on allocated sites.	1 / Noted. Councils believe the required 10% BNG and aspirational 20% BNG are clearly defined.

Rep ID	Question No.	Respondent/ SPD section	Representation	Theme/Response
51	5	Vistry Group / 5.5	Any increase from the Environment Bill should also include a reasonable transition period, so that it will not disrupt development proposals which have been based on the assumption of a lower BNG, doing so may have adverse impacts upon site capacities and or development viability.	1 / SPD updated to include the 2-year transitionary period within the Environment Act and the proposed timeline for secondary legislation and government guidance.
64	5	Vistry Group / Biodiversity Issue B5	We support the proposal in the SPD to confirm that on all major housing developments, 50% of the dwellings will have features such as integrated bird, bat or insect boxes provided in close association with the properties (Page 42, 2). Some flexibility may be required for some construction methods/finishes, but generally 50% should be achievable. There is also the practical consideration of getting the right product in the right place i.e. location within scheme is often better than the quantum. Therefore, it's best to cluster the features in higher suitability dwellings, located closer to better habitats.	6 / Provision increased following other representations and reference to the emerging British Standard. SPD amended to include ability to cluster boxes at suitable locations.
70	6	Individual - name provided / General comment	It seems thorough but also appears to require more engagement with potentially affected groups than has hitherto been undertaken	5 / Noted. The approach to consultation is in accordance with the Councils' Statement of Community Involvement and is set out in the Consultation Statement supporting the SPD.

Appendix E – Email representations and responses in order of draft SPD

Rep ID	Respondent/SPD section	Representation	Theme/Response
221	Individual - name provided / Page 3	Page 3 (Index of Biodiversity Issues): There is a typo in the index page for Wimpole Woods	6 / Noted. Text amended to reflect comments.
141	MKA Ecology / Foreword	Foreword: Perhaps add further detail on the advantages of considering biodiversity early in the planning process – to ensure biodiversity is properly integrated into projects, and to ensure opportunities for nature-based solutions are maximised.	6 / Noted. Text amended to reflect comments.
201	Anglian Water / Foreword	Anglian Water welcomes the preparation of the SPD and supports the Councils' aspirations to shape development and enhance the environment through development management decisions.	5 / Noted.
126	Cambridge Past, Present & Future / 1.1	1.1. Recognition of the threats to Biodiversity in Cambridgeshire is welcome. This could be expanded further to reinforce the importance of the guidance and aspirations of the SPD, particularly the welcome 20% target of Biodiversity Net Gain. For example, the latest Cambridge City Council Biodiversity Strategy Draft 2021-30 June 2021 (pages 6-8) gives detail on the challenges including examples of Biodiversity loss. This also identifies key influences on biodiversity loss over the years including agriculture and hydrological change.	5 / Noted. For conciseness the Biodiversity Strategy is referenced.

Rep ID	Respondent/SPD section	Representation	Theme/Response
202	Anglian Water / 1.1.2	Introduction, Status and Purpose: Anglian Water is a signatory to the Oxford to Cambridge (OxCam) Arc Environmental Principles. We recognise that the step change (para 1.1.2) required is a shift away from developers only being asked to consume their own smoke and not make the environment or the impacts of traffic worse to a position whereby each development must benefit the local community and environment. To do this biodiversity opportunities must be one of the first location and design criteria for developers (para 1.1.5) and not be an afterthought for mitigation after a location and design are fixed. This is now a guiding principle for Anglian Waters own development. We will for example be applying the approach to the application of the North East Cambridge Area Action Plan policy to Anglian Waters proposals whether those matters are considered by the City Council or determined by the Secretary of State. Anglian Water supports the objectives of the SPD and wants to delivery measurable biodiversity net gain across our entire land holding as well as at specific development sites. This follows the Lawton principles. We agree that when developers are clear on expectations these can be included in applications and equally as important be factored into the finances for a project including development agreements and land value.	5 / Noted.
158	MKA Ecology / 1.2.3	Para. 1.2.3: Reference British Standard for BNG? https://shop.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification/standard	6 / Agreed. Reference included in Section 5.5.
111	The Wildlife Trust / 1.2.4	Ch 1: Para 1.2.4 – We suggest the final sentence is changed to “It will in time be updated to support the Greater Cambridge Local Plan when this is adopted”	6 / Noted. Text amended to reflect comments.

Rep ID	Respondent/SPD section	Representation	Theme/Response
223	National Trust / 1.3	1.3 Purpose: The SPD lists specific objectives to protect and enhance biodiversity. The draft document appears to go a long way towards covering these objectives and providing applicants with appropriate information to ensure that biodiversity can be protected and enhanced through new development proposals.	5 / Noted.
203	Anglian Water / Section 2	Section 2 UK Legislation: In view of the current position of the Environment Bill, we will reserve comment on the interaction between the SPD and legislation and guidance. Anglian Water's 2020 Green Recovery Plan set out our commitments to enabling nature recovery through biodiversity net gain, natural capital, pollution reduction, nature conservation and tree planting. Our aspiration is that Local Nature Recovery Strategies Plans are broadened, enabling them to become true Local Natural Capital Plans covering the country. This would meet the ambition within the 25 Year Environment Plan and help to achieve water, carbon and nature restoration objectives together. One question for the next phase of the SPD – possibly once the Environment Act is in place – is to tackle the inconsistency between the Arc 20% net gain 'desire' (para 1.1.2), the 10% net gain requirement (para 5.5.18) and 20% vision (para 5.5.19).	1/ /Noted. Environment Act now in place and SPD updated accordingly.
127	Cambridge Past, Present & Future / 2.2	Section 2. Emerging Environment Bill 2.2. The timetable of the emerging Environment Bill is noted, and it is assumed that the SPD will be adjusted in the light of any further significant changes before the Bill is enacted. There are issues that arise from the implications of the Bill, for example with regard to Biodiversity Net Gain and others that are subject to further comment below.	5 / Noted. Section 2.2 updated in light of Environment Act having received Royal Assent.

Rep ID	Respondent/SPD section	Representation	Theme/Response
204	Anglian Water / Section 3	Section 3 Planning Policy: We support policies CC/8 in the South Cambridgeshire Local Plan and Policy 31 in the Cambridge Local Plan as these ensure developers are clear that Sustainable Drainage Systems are used for new development and that an integrated water management approach is taken from the outset of planning the layout and design of new development. We welcome the Greater Cambridge Monitoring Report setting out how a number of the policies in the two plans have been applied in making development management decisions. We would want to work with the Councils to ensure that the policies are being carried forward into developments and that the efficacy of the approaches taken by developers informs future design, policy and development management decisions.	5 / Noted.
205	Anglian Water – Section 3	Section 3 Planning Policy: Anglian Water advocates an aspirational approach to BNG and so we consider that the effective monitoring of a natural capital approach can enable a stepped approach in delivery of policy targets. For example, the over delivery or early achievement of a 10% level of BNG at developments may demonstrate that the 15% level or the 20% target sought in the Arc is deliverable. To assist developers and landowners to plan to deliver those higher levels the monitoring delivery responsibilities and approach should be set out the SPD. The policy decision can then be taken in future Development Plan documents. For Anglian Water's development we would want to factor higher levels of BNG into our own investment plans which are developed on a five- year cycle.	1 / Noted. BNG Monitoring will be a requirement for local planning authorities within the Environment Act. At present no government guidance or secondary legislation is in place.
81	Hopkins Ecology / 3.2	Section 3. This needs updating to reflect the most recent (July 2021) National Planning Policy Framework.	6 / Noted. Text amended to reflect comments.

Rep ID	Respondent/SPD section	Representation	Theme/Response
185	Countryside Properties / 3.2	We note that since the preparation of the SPD, the 2021 version of the NPPF has been published in July 2021. We assume that all necessary updates to the SPD will be made to reflect this ahead of its approval.	6 / Noted. Text amended to reflect comments.
128	Cambridge Past, Present & Future / 3.2.3	Section 3. Planning Policy 3.2.3. The reference to the need for development plans to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure is welcomed. This objective is a core part of CPPF's recent 'Cambridge Nature Network' and we are pleased that this document has also been referenced in the SPD. Development plans should also have been the subject of separate assessment to ensure that potentially harmful environmental impacts are avoided at the earliest possible stage.	5 / Noted.
112	The Wildlife Trust / 3.6	Section 3.6. The list of local biodiversity strategies is comprehensive, and we welcome the recognition given to the Natural Cambridgeshire "Doubling Nature" vision and "Developing with Nature Toolkit", the Cambridge Nature Network, Cambridge Nature Conservation Strategy, and the Chalk Streams project.	5 / Noted.
224	National Trust / 3.6	3.6 Local biodiversity strategies: We would welcome the inclusion of the Wicken Fen Vision in the list of strategies. This is not currently listed. Launched in 1999, the Wicken Fen Vision is a 100-year plan to create a diverse landscape for wildlife and people over an area of 53 square kilometres to the south of Wicken Fen. The National Trust plans to use ecological restoration techniques to create and restore wildlife habitats on a landscape scale and to provide visitors with new access to nature and green space. It will bring opportunities for access and habitat creation closer to proposed growth locations around Cambridge, including the planned New Town at Waterbeach and Cambridge East. We would wish	6 / Agreed. Vision included in Section 3.6.

Rep ID	Respondent/SPD section	Representation	Theme/Response
		to see greater reference to the Wicken Fen Vision, and to see it enshrined in clearer planning policy, as part of this SPD.	
129	Cambridge Past, Present & Future / 3.7	3.7. The examples given of the types of permitted development rights that may be exercised include those on agricultural land. Changes in agricultural practice have had profound effects on biodiversity. Whilst it is appreciated that most agricultural activity falls outside planning control, current agricultural permitted development rights include a range of activity for the erecting or extension of buildings and for excavations and engineering operations. There may also be times when development connected with agriculture is of such a scale that planning permission is required. All of this activity could impact habitats and species and merits highlighting as a separate biodiversity issue in the guidance. The Government has also relaxed some permitted development rights recently and it is possible that more will follow. There may be the need to amend and update the SPD accordingly if any increase in permitted development rights has implications for biodiversity conservation or fall outside the scope of the current guidance.	5 / Noted. Permitted development is addressed at 3.7. The Councils consider that the SPD sufficiently addresses all development, such that there would not be benefit in highlighting agricultural development as a separate biodiversity issue in the SPD.
144	Natural England / Section 4	Section 4 of the SPD provides a comprehensive overview of Legislation, policy and guidance relating to statutorily and non-statutorily designated nature conservation sites, protected species and priority habitats and species.	5 / Noted.

Rep ID	Respondent/SPD section	Representation	Theme/Response
206	Anglian Water / Section 4	Section 4 Biodiversity Resource: Anglian Water supports the approach of assessing biodiversity resource at a scale wider than the GC area (Figure 2). Figure 4 also serves to illustrate that blue and green infrastructure is a functioning network of interconnected sites largely based on the watercourse and water body network. This network also serves to provide important linear and local site access to the natural environment. The watercourse network also plays a vital role the area GC plays in flood management up and downstream of the waterbodies within GC.	5 / Noted.
82	Hopkins Ecology / 4.2	In the legend for Figure 2 (section 4.2.), Ramsar sites are referred to as Rasmar sites.	6 / Noted. Text amended to reflect comments.
159	MKA Ecology / 4.2	4.2: Statutory Designated Sites - Also Woodwalton to NW in the Fenland SAC	6 / This site is a significant distance away from Greater Cambridge.
83	Hopkins Ecology / 4.2	In section 4.2, it may be worthwhile providing some context for the implications of Brexit on Habitats (European) sites. This could re-iterate some of the commentary within Section 2 to emphasise relevant points.	3 / Noted. Not amended as all relevant legislation has been retained in UK law.
160	MKA Ecology / 4.2.5	Para. 4.2.5 Also roosts of male barbastelles in old barns outside the SAC – we seem to be turning these up regularly (this year at Steeple Morden and also Royston)	6 / Noted.
161	MKA Ecology / 4.3.1	Para. 4.3.1 Add that an absence of records does not mean an absence of the species (I see this is added at 5.4.2!)	6 / Noted.
162	MKA Ecology / 4.5	4.5: Cracking picture of a hare!	5 / Noted.
84	Hopkins Ecology / 4.5.5	In section 4.5.4, it would be useful to mention the locations of the local B-Lines (running through the west and south of the Greater Cambridge area).	6 / Link to plan included in SPD.

Rep ID	Respondent/SPD section	Representation	Theme/Response
163	MKA Ecology / 4.5.4	Para. 4.5.4: Plantlife Important Plant Area at Chippenham Fen and Wicken Fen too far for consideration? https://www.plantlife.org.uk/uk/nature-reserves-important-plant-areas/important-plant-areas.	6 / These sites are outside of Greater Cambridge.
171	MKA Ecology / 5.5.1	Para. 5.5.1: Suggest that retaining and enhancing existing biodiversity features will help to make it easier to deliver a biodiversity net gain?	6 / Noted. Text amended to reflect comments.
145	Natural England / Section 5	Natural England supports the information and reference to key guidance presented within Chapter 5: Biodiversity and the development management process. We welcome that this is focused on the application of the ecological mitigation hierarchy and makes detailed reference to Natural England's Impact Risk Zones (IRZs).	5 / Noted.
207	Anglian Water / Section 5	Section 5 Development Management Process: Figure 5 illustrates that without monitoring, reporting, management and corrective action and possibly enforcement all the previous steps from policy formulation to scheme approval and implementation may prove in effective. Responsibility for monitoring, reporting and corrective steps and then subsequent higher-level/ GC scale assessment to inform policy review needs to be clearly set out. For example, one of the lessons from Northstowe is that opportunities for integrated water management need to be considered early and appropriate scales and the effectiveness of implementation used to inform layout and design options for later stages in the development. This will then also enable assessment by the Records Centre (para 5.4.14) of the effectiveness of the wider policy and specific habitat and species measures. This is alluded to later in paragraphs 5.5.30. 5.7.2 and 5.8.3 and we would support greater clarity	2 / Noted. BNG Monitoring will be a requirement for local planning authorities within the Environment Act. At present no government guidance or secondary legislation is in place.

Rep ID	Respondent/SPD section	Representation	Theme/Response
		on responsibilities to aid the effectiveness of the SPD. The SPD needs to more clearly set out roles in monitoring the biodiversity plans approved in planning applications. This may include developing capacity at a local community level with organisations such as the Wildlife Trust. Anglian Water is working to improve our own performance monitoring and reporting to demonstrate the effectiveness of nature- based solutions, for example.	
210	Anglian Water / Section 5	Section 5 Development Management Process: Anglian Water is working on approaches for our projects which enable biodiversity net gain delivery for linear projects such as pipelines where either we don't own the land, or the land area is limited and/ or has minimal long term land take and impacts. For example, our approach to baselining of all our assets gives us the ability to identify net gain locations which have more than local benefits or to work with local partners such as Highway Authorities to support enhanced net gain on roadside verges potentially alongside small- scale Anglian Water network and maintenance works. We ask that there is sufficient flexibility in the SPD and its implementation to support these innovations.	6 / Noted. No change proposed. Offsite BNG is supported in principle in following mitigation hierarchy and BNG best practice. National and Local BNG mechanisms are still in their infancy but remain flexible.
164	MKA Ecology / 5.1.1	Figure 5: Stages within the development management process - Seems to indicate that Mitigation, compensation and enhancement plans come after the Application. Would it be helpful to have the word 'Enact' before 'Mitigation, compensation….'	6 / Comments noted. Not amended. The Mitigation compensation and enhancement information follows logically from the key message in the line before 'Provide the Councils with certainty of impacts, and

Rep ID	Respondent/SPD section	Representation	Theme/Response
			details of proportionate mitigation and compensation'. Not considered necessary to add to this.
187	Countryside Properties / 5.1.1	Figure 5: The SPD has sought to provide a simplified diagrammatic representation of the stages within the development management process at Figure 5 of the SPD. Whilst it is recognised that this will be of assistance to those not directly involved in the development management process, concern is raised that this does not reflect the nuances that apply in how the key messages stated are in fact to be applied.....Whilst we acknowledge that the document should be read as a whole, we would suggest that the insertion of “wherever possible” or such similar terminology into both Figure 5 and the introductory sentences of the Biodiversity Issues where relevant	6 / Noted. Not amended. The SPD provides a clear steer on the process. Justifiable deviations from this can be agreed with officers on a case-by-case basis.
130	Cambridge Past, Present & Future / 5.2	Section 5. Biodiversity in the Development Management Process 5.2. Overarching principles. Strict adherence to the mitigation hierarchy is essential to protect biodiversity, particularly to avoid damage or loss in the first place through, for example, less damaging alternative sites or designs. The hierarchy then goes on to describe the other key stages of mitigation and possible compensation. Offsetting damage to the natural environment can be difficult and problematical. With regard to the latter, Local Authorities need to be fully confident that any mitigation strategy will work, its effectiveness monitored over time and sufficient legal and financial provisions exist to secure any remedial action (See further comments on the latter below). Compensation to provide alternative habitat can be even more difficult and should only ever be regarded as a	6 / Noted. Text amended to reflect comments.

Rep ID	Respondent/SPD section	Representation	Theme/Response
		last resort. It also needs full justification of why harm cannot be avoided; arguably irrevocable damage to important biodiversity sites or species should only ever be considered if there is a clear public interest at stake. It is appreciated that the SPD covers the process by which the mitigation hierarchy operates and mentions overarching principles and standards. However, more emphasis to the need for strict adherence to the mitigation hierarchy and the potential practical difficulties that may involved in securing effective mitigation or compensation would be welcome.	
231	RSPB – 5.2.1	5.2.1 - 'Mitigate' should include reducing impacts through project design, and implementation of construction and operational measures.	6 / Noted. This is considered to be covered by 'Avoid'
165	MKA Ecology / 5.2.3	Para. 5.2.3: Seeking advice from an ecological consultant at an early stage in the process will help to avoid delays and also ensure that biodiversity is considered from an early stage making integration more achievable.	6 / Noted. Text amended to reflect comments.
131	Cambridge Past, Present & Future / 5.2.5	5.2.5. The SPD indicates that: 'The approach to following the hierarchy should be informed by the ecological value of the habitats and species to be affected. Impacts to Priority habitats and species should always be avoided, if possible, but mitigation or compensation for other species and habitats is also **desirable**.' (emphasis added). There may be occasions when mitigation or compensation for non-priority species and habitats is not just desirable but required and the wording in the guidance should be changed to reflect this.	6 / Noted. Text amended to reflect comments.

Rep ID	Respondent/SPD section	Representation	Theme/Response
71	Universities Superannuation Scheme / 5.3.1	Paragraph 5.3.1 of the Biodiversity SPD states that "The easiest way to avoid a negative impact on species and habitats and to maximise the gain for biodiversity that can be achieved from a development is to select a site that has low existing ecological value and low strategic potential for habitat creation, buffering or connectivity". USS notes the Council's reasoning for this and agrees that in some cases certain sites are inherently not suited to supporting high levels of biodiversity. USS requests that the Council provides further clarification in Paragraph 5.3.1 to provide examples of the types of sites with low existing ecological values where there is likely to be low strategic potential for improvements such as industrial sites and sites adjacent to infrastructure.	3 / Noted. Text amended to reflect comments.
188	Countryside Properties / Biodiversity Issue B2	Such a concern also applies to a number of the opening statements of the identified Biodiversity Issues. For example Biodiversity Issue B2 – Protection of irreplaceable habitats states: "Developers will be expected to avoid direct and indirect impacts on irreplaceable habitats and embed measures to achieve this within the design of any development proposal." The supporting text does however go on to explain the balancing exercise which would be undertaken if the proposals would result in the loss, deterioration or fragmentation of irreplaceable habitats. Whilst we acknowledge that the document should be read as a whole, we would suggest that the insertion of "wherever possible" or such similar terminology into both Figure 5 and the introductory sentences of the Biodiversity Issues where relevant would aid in clarity and understanding. Updates are considered to be required to Biodiversity Issues B2, B4 and B5.	6 / Noted. Not amended. The SPD provides a clear steer on the process. Justifiable deviations from this can be agreed with officers on a case-by-case basis.

Rep ID	Respondent/SPD section	Representation	Theme/Response
166	MKA Ecology / Biodiversity Issue B2	Biodiversity Issue B2: For the avoidance of doubt, I wonder if it would be helpful to state what exceptional reasons are? In the NPPF there is a small footnote stating 'for example, infrastructure projects (including NSIPs, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat). The NPPF refers to 'wholly exceptional reasons' – I wonder if the wording in this section should be worded more forcefully, the NPPF seems to allow this?	6 / Noted. Text amended to reflect comments.
132	Cambridge Past, Present & Future / 5.3.3	5.3.3. This refers to development predicted to result in impacts on irreplaceable habitat and indicates that compensation strategies should include contribution to the enhancement and management of the habitat. However, it should also be noted that the duty to restore important habitats that are, for example, in unfavourable condition, should apply as a freestanding obligation. Compensation for damaging development to a site by way of its habitat enhancement and management should not substitute action that should be happening anyway. This should be made clear in the guidance.	6 / Noted. Text amended to reflect comments.
170	MKA Ecology / 5.4 Pre-app advice	Section 5.4: Within this section, is there value in making the seasonality of ecological surveys clear? As consultants this is often one of the biggest obstacles for our clients. Sadly, I don't think CIEEM have a survey calendar available to reference. Perhaps a statement to make clear that surveys are seasonal and consulting an ecologist at an early stage will help to avoid seasonal delays. (I now see this in Appendix 2! Perhaps reference in the text?).	6/ Noted. Text amended to reflect comments.

Rep ID	Respondent/SPD section	Representation	Theme/Response
109	Hopkins Ecology / 5.4 Pre-app advice	5.4 The key point is that achieving net gain significantly reduces developable areas and delivery rates: Greater land areas will be required to achieve housing targets. The implications of a 20% net gain could include a requirement for additional land for the delivery of current housing targets, with implications for the number of currently allocated sites. Within emerging plans it would require additional land to be allocated.	1 / Noted. Not amended. The SPD seeks an aspiration 20% BNG and is not creating new policy.
87	Hopkins Ecology / 5.4.1	5.4.1 "Data search requests should be for a minimum 1 km buffer from the red line boundary for protected and priority species and 2km for all designated sites". This should be less prescriptive, to allow for data searches from centre points. Its is also considered that in some contexts data searches are unlikely to be informative, such as some householder applications with very small zones of influence. This should be acknowledged in the SPD.	6 / Noted. Not amended. If application seeking to deviate from this requirement then can provide justification on a case-by-case basis.
167	MKA Ecology / 5.4.1	Para. 5.4.1: CIEEM's guidance on 'accessing and using biodiversity data in the UK' (https://cieem.net/wp-content/uploads/2016/03/Guidelines-for-Accessing-and-Using-Biodiversity-Data-March-2020.pdf) does give some provision for assessments without a data search (section 7.8) although these are rather specific and stating so here may make it overly complicated?	6 / Noted.
133	Cambridge Past, Present & Future / 5.4.2	5.4.2. This indicates that where there is a predictable impact on biodiversity and insufficient ecological information is submitted to support determination, the Councils are likely to refuse an application. This is also repeated in subsequent sections of the SPD and is strongly supported. Local Authorities should always take a precautionary approach and refuse	5 / Noted.

Rep ID	Respondent/SPD section	Representation	Theme/Response
		consent when the required ecological information is lacking or where up to date surveys have not been provided.	
88	Hopkins Ecology / 5.4.3	5.4.3 "…any sensitive records should only be shown at 10km resolution" This is a little inconsistent with the recommendation for data to be from a 1km radius, which is more precise than the 10km resolution suggested.	6 / Noted. Not amended. Sensitive data can be used to inform the application, but not shown at high resolution within public documents.
89	Hopkins Ecology / 5.4.5	5.4.5 requires 'all protected and Priority species … to be moved'. This is not necessarily appropriate for mobile species with Priority status (e.g. many birds) or species which simply cannot be captured in meaningful numbers (e.g. widespread moths).	6 / Noted. Text amended to reflect comments.
168	MKA Ecology / 5.4.7	Para. 5.4.7: Reference the CIEEM advice note on lifespan of ecological reports? https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf	6 / Agreed. Amended in Section 5.4.7.
169	MKA Ecology / 5.4.8	Para. 5.4.8: PEAs also a means of identifying the ecological opportunities at a site?	6 / Noted. Not amended as covered later in SPD.

Rep ID	Respondent/SPD section	Representation	Theme/Response
73	Universities Superannuation Scheme / 5.4.8	Paragraph 5.4.8 of the Biodiversity SPD advises that Preliminary Ecological Assessments should be commissioned at the earliest stages of design, and their results should influence the layout and form of the proposals. USS acknowledges the benefits of commissioning Preliminary Ecological Assessments at an early stage for sites where there is likely to be significant ecological gain. However, for sites such as brownfield sites where the existing ecological value will be limited based on the criteria set out in the SPD, it is crucial that the Preliminary Ecological Assessment is not read in isolation since such sites have the potential to improve on the base position. Decisions about layout and form should be based on a full suite of technical documents, including flood, drainage, contamination, highways etc to ensure that the optimum design is achieved. Failure to do this could result in poorly designed developments. USS requests that the Biodiversity SPD is updated to explain that the results of Preliminary Ecological Assessments should not be viewed in isolation. For example, if protected species are found on a site through the Preliminary Ecological Assessment this should not be seen as a barrier to development but a benefit as it enables biodiversity enhancement. Translocation can also be used effectively to promote and improve biodiversity, which is a positive impact of redeveloping brownfield sites. USS also requests that the Biodiversity SPD states that if Preliminary Ecological Assessments identify that further surveys are required, then the Council should adopt a pragmatic approach to timings of these surveys. Additional surveys are often needed to understand detailed mitigation but not for the principle of development. Therefore, the requirement could be by condition where appropriate.	5 / Noted. SPD request Preliminary Ecological Assessments to inform early design and integration into the development.

Rep ID	Respondent/SPD section	Representation	Theme/Response
134	Cambridge Past, Present & Future / 5.4.11	'Pre-development biodiversity value must be calculated before any site clearance or other habitat management work has been undertaken, by the applicants or anybody else. However, if this is known to have happened, the condition of the site on or after 30th January 2020 will be taken as the habitat baseline stated in Schedule 14 Part 1 paragraph 6 of the emerging Environment Bill.' The intention to set a baseline date for the predevelopment biodiversity of a site in line with the emerging Environment Bill is noted. However, it is possible that habitat clearance of site may have taken place before 30th January 2020. Indeed, this happened in a recent case regarding development south of Coldhams Lane in Cambridge where habitat clearance of a City Wildlife site happened several years ago. In this case, information and records of the site of the site before its clearance are available but have not been taken into account by the applicant. CPPF and others object (inter alia) to the proposal because the full biodiversity value of the site is not represented and this, in turn, affects the real value any net biodiversity gain claimed. The intention of the Bill is to provide legal certainty regarding relevant dates with regard to future planning applications. However, the way this is quoted in the guidance is potentially misleading because it implies that any damage prior to 30th January 2020 will not be taken into account. We do not believe it is the intention to of the Bill to legitimise in any way acts of deliberate damage before 30th January 2020 and would argue strongly that this is certainly not the case when clear information exists about the biodiversity value of a site before that date. In such cases Local Planning Authorities should take into account the past biodiversity value of a site as material consideration in any planning decision, including the assessment	6 / Noted. Text amended to reflect comments.

Rep ID	Respondent/SPD section	Representation	Theme/Response
		of net biodiversity gain. The current draft guidance is potentially misleading and should be amended accordingly (This comment also applies to para 5.5.31).	
147	Natural England / 5.4.11	We suggest that the relevant part of section 5.4.11 should be reworded slightly to read as follows: However, if this is known to have happened on or after 30th January 2020, the condition of the site will be taken as the habitat baseline stated in Schedule 14 Part 1 paragraph 6 of the emerging Environment Bill.	6 / Noted. Text amended to reflect comments.
90	Hopkins Ecology / 5.4.11	5.4.11 requires the baseline to be established before 'site clearance or other habitat management work'. This is presumably to prevent the baseline value from being lowered by removing key features, however the definition of 'habitat management work' is too vague and could prevent normal activities on site that are unrelated to development.	5 / Noted. Disagree. Habitat management in advance of survey work could impact on the survey findings and baseline BNG for the site.
253	RSPB / 5.4.11	5.4.11 - calculation of biodiversity value before site clearance - support	5 / Noted.
256	RSPB / 5.4.14	5.4.14 - the sharing of biodiversity data with the local records centre and recording of 'grey data' - support	5 / Noted.
93	Hopkins Ecology / Biodiversity Issue B4	Secure the provision of appropriate public access to natural green spaces' should be better defined. While 'appropriate' potentially covers circumstances where such access could be detrimental, there should nevertheless be a greater caveat with respect to sites that are vulnerable to recreational disturbance.	5 / Noted. Not amended. For conciseness the term 'appropriate' covers this point.
254	RSPB / Biodiversity Issue B4	Page 40 - support for the list of habitats considered important for biodiversity, especially points 4 & 5.	5 / Noted.

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113	The Wildlife Trust / Biodiversity Issue B4	Chapter 5 Biodiversity Issue B4 – Conserving & Enhancing Biodiversity Bullet 5 - We suggest that bullet 5 is amended, because as currently worded it is ambiguous and could be read as suggesting the delivery of Nature Recovery Networks can only occur within the built environment, which is clearly not the case. We therefore suggest removing “within an otherwise built environment”.	6 / Noted. Text amended to reflect comments.
114	The Wildlife Trust / Biodiversity Issue B4	Bullet 6 – Again restricting the wording of this bullet point to the built environment seems overly restrictive? We therefore suggest removing “an otherwise built environment”.	6 / Noted. Text amended to reflect comments.
92	Hopkins Ecology / 5.5	Section 5.5: Design Stage: Under Biodiversity Issue B4 – Conservation and enhancement of biodiversity, policy requirement 1 is to: “Secure the conservation management and enhancement of natural and semi-natural habitats in the landscape together with the biodiversity that they contain and seek to restore and/or create new wildlife habitats.” More clarity is required on the scope of this and how is this to be achieved.	5 / Noted. Not amended. Requested detail provided later in the text.
110	Hopkins Ecology / 5.5	5.5 Where off-site measures are required, then the difficulties identified above will be compounded in terms of finding and securing suitable areas for enhancement. Further, there is a requirement for the identification of a mechanism for delivery of net gain as part of any application, which will add substantially to costs and time required to prepare planning applications, in effect requiring detailed S106 agreements to accompany applications. This point needs to allow for developers to use a range of providers to achieve off-site measures, including the use of financial payments to providers without the need for the location of measures to be identified as the application stage.	2 / Noted. These requirements reflect the Environment Act provisions, and do not amount to a requirement for s106 agreement to be prepared at the time of application.

Rep ID	Respondent/SPD section	Representation	Theme/Response
225	National Trust / 5.5	5.5 Biodiversity in the development management process (Design Stage): The National Trust supports the recommendation that the new Local Plan policies should instruct a higher percentage of Biodiversity Net Gain (BNG) than the 10% figure which is expected to be required by the Environment Bill. We support the 'Doubling Nature Vision' (adopted by South Cambridgeshire Council) which seeks a 20% level of BNG above pre-development baseline conditions.The National Trust support the use of planning conditions and obligations to secure both on and off-site habitat creation and biodiversity enhancements. In our view, contributions to appropriate off-site projects can be a very effective way to achieve biodiversity gain and can deliver significant benefit to local communities.	1 / Noted.
232	RSPB / 5.5	5.5 - Design Stage - with regards to 'provision of appropriate public access to natural green spaces', it would be worth including some wording here, or a footnote defining what 'appropriate' is - particularly in relation to sensitive local habitats that could be impacted by inappropriate access.	6 / Noted. Not amended. Appropriate public access would depend on location, habitat type and species present, to be agreed on a case-by-case basis.
172	MKA Ecology / 5.5.1	Para. 5.5.2: State that it may be necessary to consider recreational impacts on habitats outside the site boundary for residential schemes?	6 / Noted. Not amended. The current wording notes that 'the potential impact of public access must be fully considered' which would include recreational impacts outside the site boundary

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			where relevant. No further wording necessary.
94	Hopkins Ecology / 5.5.1	The inclusion of a site where the presence of 'Priority species or habitat' is 'considered important for biodiversity' is overly vague. For example, the presence of some such widespread species (e.g., many birds or moths) could be expected on most sites. This should be caveated with 'significant population' or other wording. This has implications as to whether the requirements of 5.5.1 can be achieved where the 'existing value' (species or habitat) is widespread on a site, but for which the wider value is low.	5 / Noted. Current wording considered appropriate to guide application.
95	Hopkins Ecology / 5.5.1	Further, sites considered important for biodiversity include those which: "Have the potential to assist in the delivery of National, County or District Nature Recovery Networks and clearly act as a stepping-stone, wildlife corridor or refuge area within an otherwise built environment." This, by implication, includes most brownfield sites. The following section, 5.5.1, states that for such sites, "Management should be sustainable for the long-term, with clear objectives guided by the site's existing habitat features and species, as appropriate to location and environmental conditions." It is unclear how development of brownfield sites is compatible with this policy.	5 / Noted. These comments are outside the scope of the SPD which does not identify which locations are suitable for development.
233	RSPB / 5.5.1	5.5.1 - suggest remove 'where possible, to' - this seems unnecessarily weak. Long term sustainable management - we welcome this but suggest there may need some text considering how this might be done in practice - and ensuring any committed sums are suitably conservative.	6 / Noted. Regarding 'where possible, to' – agreed. Text amended. Regarding long term sustainable management - no amendment proposed.

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			Providing explanation of this term would require considerable detail which would not be appropriate in the SPD.
135	Cambridge Past, Present & Future / 5.5.2	5.5.2. The caveat regarding the need to fully consider potential impacts of increased public access on important habitats and species is welcomed. This issue is becoming increasingly important as recreational pressure on existing sites in Cambridgeshire increases (see also comments re SANG below).	5 / Noted.
106	Hopkins Ecology / 5.5.3	Paragraph 5.5.30 requires the identification of a mechanism for delivery of net gain as part of any application. This is a level of detail which will add substantially to costs and time required to prepare planning applications, in effect requiring detailed S106 agreements to accompany applications. This could further reduce delivery rates for new housing, and possibly impact smaller schemes and developers disproportionally, while larger schemes may have greater flexibility in masterplan designs.	1 / Noted. No proposed amendment. These requirements reflect the Environment Act provisions, and do not amount to a requirement for s106 agreement to be prepared at the time of application.
74	Universities Superannuation Scheme / 5.5.4	Paragraph 5.5.4 of the Biodiversity SPD states that the Council will expect "That on all major housing developments 50% of the dwellings/units will have features such as integrated bird, bat or insect boxes provided in close association with the properties. On all other sites suitable provision for biodiversity enhancements shall be negotiated to achieve a similar standard." USS acknowledges the benefits of integrating bird, bat or insect boxes in properties but notes that on constrained sites, it is not always suitable to provide these in a large proportion of units especially if	6 / Noted. Biodiversity Issue B5 – Biodiversity provision in the design of new buildings and open spaces amended to note that bird, insect and bat boxes should be located individually or clustered in

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		these are apartments. Instead it can often be better to focus them on a smaller number of units located in the optimum position for wildlife on the Site. Where these are apartment blocks, these may be located in several locations along the roof or in select locations on the façade, rather than in every apartment. USS therefore requests that the following sentence is added to paragraph 5.5.4: “On constrained sites, particularly those with a large number of apartments, practical consideration should be given to prioritising bird, bat or insect boxes in optimum areas of the site.” It is key that the Biodiversity SPD is sufficiently flexible for the most appropriate ecology improvements to come forward on individual sites. This will need to be determined through ecology surveys and master planning of each site. It may be possible to exceed the minimum ecology improvements set out in the Biodiversity SPD for example by adopting alternative approaches. USS requests that this is noted in the Biodiversity SPD.	appropriate locations within the development.
218	Individual - name provided / 5.5.4	Aftercare does not have much emphasis. I noticed it is mentioned in 5.5.4 h) and in 5.8.1. Enforcement of maintenance should be strong but would be time consuming.	2 / Noted. Referenced through Ecological Landscape Management Plan Conditions.
234	RSPB / 5.5.4	5.5.4 - Waste removal from site should be at a minimum. A paragraph on re-purposing for other use should be added. For example: Timber can be used for deadwood habitat and additionally creative features in landscape. Woody brash can be used in hibernacula as too can brick rubble and aggregates. Waste aggregates and crushed demolition materials can be used as nutrient poor substrate in replicate brownfield landscaping. See section 5.5.7.	6 / Agreed. Section 5.5.7 amended to include ' Natural timber and aggregate waste from site should be retained and repurposed for habitat creation such as hibernacula

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			and low nutrient banks wherever possible'.
173	MKA Ecology / Biodiversity Issue B5	Biodiversity Issue B5: Great to get the numbers in here, particularly for commercial applications which are always quite difficult to gauge. For point 2 should that percentage be upped to 100%. Not much to ask when you consider the small proportions of budgets and the profit margins. It's not clear why smaller developments should have a greater requirement. I would argue that larger scheme should be making a greater contribution. Is there any leverage for inclusion of ponds in larger schemes? Given their value for wildlife it would be super to try and encourage their creation. We are regularly told they are not possible, but I suspect with a bit of encouragement within a document such as this it may be easier to achieve.	6 / Noted. Biodiversity Issue B5 amended to state "that on all residential housing developments, there should be an equal number of integrated bird box features as there are dwellings for building-dependent birds".
189	Countryside Properties / Biodiversity Issue B5	Biodiversity Issue B5: Whilst we are generally supportive of the requirements of Biodiversity Issue B5 which relates to biodiversity provision in the new buildings and open spaces we do have some detailed comments regarding the requirements proposed	5 / Noted. See response to more specific comments.

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235	RSPB / Biodiversity Issue B5	Biodiversity Issues B5, point 2 (p.42) - Specifically regarding swift boxes, the standard advice for swift bricks is a 1 brick per house but not in the literal sense. Its normal to suggest 2-4 boxes on a selection of houses but totalling the number of housing units. As worded, this could be interpreted as just 50 boxes 1 on each of 50 houses. Numbers of bat/insect bricks are fewer and limited by lots of other variables such as lighting plans, the vicinity of good vegetation cover/sources of nectar, having only to face southerly aspects, etc. Also needs to make reference to: BS42021 Integral nest boxes – Design and installation for new developments – Specification. It's still not published but coming soon - hopefully by end of year.	6 / Support proposed increase of required integrated nest box provision. B5 wording has been amended accordingly.
190	Countryside Properties / Biodiversity Issue B5	Countryside support the overall requirement that the equivalent of 50% of the dwellings/units on development sites should include integrated bird, bat or insect boxes. We would however suggest that rather than an arbitrary requirement for these to be distributed evenly across the number of units, these can sometimes be best focused in clusters on certain units where these link to important ecological features such as hedgerows and open spaces. It is considered that such an approach would be of greater ecological benefit and it is considered that appropriate flexibility should be introduced into the policy to allow for such a scenario.	6 / Noted. Text amended to reflect comments.

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140	Action for Swifts, Fulbourn Swifts and Over & Swavesey Swift Conservation Project 2020 / Biodiversity Issue B5	Provision of nesting and roosting bricks. The introductory paragraph of the Draft Biodiversity SPD says " …'Both Cambridge City Council and South Cambridgeshire District Council have declared a biodiversity emergency, and strongly support a step change in the protection and enhancement of biodiversity in Greater Cambridge' " However, the proposals for integrated bird, bat or insect boxes are no different from the last SPD in 2009, let alone "a step change". The draft proposal is: 'That on all major housing developments 50% of the dwellings/units will have features such as integrated bird, bat or insect boxes provided in close association with the properties. On all other sites suitable provision for biodiversity enhancements shall be negotiated to achieve a similar standard' Since 2009, standards have advanced to an expectation that the number of integral bird boxes in a development should equal the number of dwellings and that provision for bats and insects should be in addition to this. Already, a number of SPDs across the country carry this level of provision, for example that of Oxford City Council within the Ox Cam Arc: https://www.oxford.gov.uk/info/20067/planning_policy/745/planning_policy_-_technical_advice_notes_tan. This issue is particularly important because cavity nesting birds, which have nested for generations in older houses in holes and cavities under the eaves and in walls, are in dramatic decline. Sparrows and starlings are Red Listed, and swifts have declined at an average rate of 5.4% per annum over the last 10 years and by 60% in the last 25 years, so we anticipate that the swift will move from the Amber to the Red list at the next BoCC revision expected in December 2021. We strongly suggest that in Biodiversity Issue B5 of the Draft	6 / Support proposed increase of required integrated nest box provision. B5 wording has been amended accordingly.

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		Biodiversity SPD: ● The level of bird nest brick provision be increased to 1 per house and 1 per 2 flats in line with current good practice. ● Also, there should be guidance on provision of nesting and roosting bricks for all types of building such as schools, student accommodation, hotels and offices. ● The level of bat roosting bricks be addressed separately and at the rate suggested in the Oxford City Council Guidance (see above) subject to site location and features. ● Pollinator provision be addressed mainly through planting schemes, recognising that the presence of hedges and shrubbery and nesting birds close to homes is important for enhancing the wellbeing of residents.	
75	Universities Superannuation Scheme / 5.5.5	Paragraph 5.5.5 of the Biodiversity SPD requires the design of new developments to "seek to retain habitats of value to biodiversity wherever possible. Even for small scale developments, this would include boundary hedgerows, trees and any pond on site and these can provide the framework for the setting of the scheme layout as well as contributing to the post development network for nature and people." USS agrees that habitats should be retained in situ where possible. USS also notes that where comprehensive redevelopment of sites is brought forward, it is not always possible to retain existing habitats in their entirety. USS notes that in some cases, habitats can be expanded and improved by being translocated rather than being retained in situ. USS acknowledges that paragraph 5.5.5 caveats this requirement as 'where possible' and supports this.	5 / Noted.

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236	RSPB / 5.5.5	5.5.5 - suggest 'design of new developments should retain habitats of value to biodiversity.' Again the additional wording unnecessarily weakens the text.	6 / Agreed. Text amended to reflect comments.
96	Hopkins Ecology / 5.5.6	5.5.6 “Landscape design will be required to enhance existing habitats and link them to new habitats created within the development site that are suited to the landscape character.” It is unclear how enhancing existing habitats is compatible with paragraph 2 under Biodiversity Issue B4, which states that development should: “Secure the provision of appropriate public access to natural green spaces.” Public use of existing habitat is likely to increase with development, and bring with it challenges like nutrient enrichment, littering and disturbance.	5 / Noted. Public access and enhancement of habitats needs to be balanced within the landscape design.
237	RSPB / 5.5.6	5.5.6 - Landscape design should also be integrated into net gain considerations. It would be good to reference the NHBC 'Biodiversity in new housing developments' - https://www.nhbcfoundation.org/publication/biodiversity-in-new-housing-developments-creating-wildlife-friendly-communities/	3 / Noted.
85	Hopkins Ecology / 5.5.8	5.5.8 repeats earlier text relating to the solitary bees.	5 / Noted. The repeated text provides a description supporting the image.
97	Hopkins Ecology / 5.5.9	5.5.9 “Green roofs should support diverse habitats of local relevance rather than sedum monocultures, which have aesthetic appeal, but limited value to biodiversity.” There are two points here: First, the value of Sedum roofs is possibly not as low as suggested. For example, the Buglife guide ‘Creating Green Roofs for Invertebrates’ indeed lists more rare and common species as present on Sedum roofs than extensive roofs (see Table 2 within the guide). Anecdotally, Sedum roofs potentially have	5 / Noted. Not amended as sedum up to 25% of roof areas is referenced and SPD seeks a diversity of green roof types.

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		greater value at certain times than extensive roofs, e.g. for pollinators. We would propose a modification of wording to be somewhat more positive about the value of Sedum.	
98	Hopkins Ecology / 5.5.9	5.5.9 Second, the policy should also recognise significant constraints that are relevant in some contexts. Specifically, green roofs can add substantially to the weight of roofs, particularly larger spans as within commercial or public buildings. This would have knock-on impacts to sustainability (e.g. additional steel requirements) and costs. Green roofs may also limit the use of roofs for solar panels and other uses.	5 / Noted, text amended to note that biodiverse roofs and walls will be encouraged where appropriate, as part of a wider strategy of biodiversity enhancements.
208	Anglian Water / 5.5.9	From a net gain perspective paragraphs 5.5.9 and 5.5.10 references green and brown roofs. From a value for money business point of view Anglian Water is not convinced these provide the biodiversity return from investment as they can be relatively cost prohibitive and unpractical on some if not most of our sites. We ask that at our sites we work with the Councils to develop options which have an overall greater impact which can require less carbon intensive construction.	6 / Noted, text amended to note that biodiverse roofs and walls will be encouraged where appropriate, as part of a wider strategy of biodiversity enhancements.
238	RSPB / 5.5.9	5.5.9 - Suggest the last sentence is open to abuse and developers may see this as an alternative to integral boxes. We suggest tree boxes particularly for starlings, so to make the wording more specific you could amend to 'Where appropriate, high quality durable boxes to target starlings, can also be provided on retained trees within the public realm adjacent or in proximity to short amenity grassland.'	6 / Noted. Not amended. 5.5.9 refers to boxes in addition to the integrated requirement detailed in B5.

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76	Universities Superannuation Scheme / 5.5.9-5.5.12	Paragraphs 5.5.9 to 5.5.12 of the Biodiversity SPD encourage the provision of biodiverse green and brown roofs. USS acknowledges the benefits of green and brown roofs and the contributions they can provide to improving biodiversity on constrained sites where this is not possible at ground level. However, USS also notes that green and brown roofs are not always the most appropriate solution. On smaller roof spaces the space could have limited biodiversity success as a green or brown roof and may be better suited to accommodating solar panels or for helping to reduce flood risk by providing adequate drainage for example. To provide sufficient flexibility, the SPD should note that the provision of green or brown roofs should be decided on a case-by-case basis, informed by technical assessments. USS therefore requests that the document is updated to state “where appropriate as part of a wider strategy of biodiversity enhancements” with regard to the encouragement of green and brown roofs.	6 / Noted, text amended to note that biodiverse roofs and walls will be encouraged where appropriate, as part of a wider strategy of biodiversity enhancements.
99	Hopkins Ecology / 5.5.12	5.5.12 The reference to the DEFRA Biodiversity Metric and the condition scores has been superseded by the latest release (3.0, July 2021) and needs to be revised.	6 / Noted. All references to the DEFRA Biodiversity Metric within the SPD have been updated.
239	RSPB / 5.5.12	5.5.12 - maybe worth paragraph reference to 'biosolar green roofs’. Solar panels work more effectively in conjunction with a green roof. Although the panels are not in shot - the image is of the biosolar green roof on the DAB in Cambridge.	6 / Noted. Biosolar green roofs are referenced within the Sustainable Design and Construction SPD.

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209	Anglian Water / 5.5.13	Para 5.5.13 to 5.5.17: Anglian Water supports the approach set out in paragraphs 5.5.13 to 5.5.17 on Sustainable drainage systems. We are seeking to secure the commencement of Schedule 3 of the Flood and Water Management Act by government and so introduce a stronger presumption in favour of SuDS.	5 / Noted.
240	RSPB / 5.5.13	5.5.13 - (SUDS) - This section is too weak and could do with a lot of expanding - maybe over two pages (or more?). Its arguably one of the most important components of a new development. Cambridge has the opportunity to lead the way while everyone sits on the fence in England with regards to design of 'real SuDS'. It will also provide wider opportunity and benefits for public amenity and biodiversity. Its misses the value and benefits of source control. As well as the referenced guide these documents are useful: https://www.cambridge.gov.uk/media/5457/suds-design-and-adoption-guide.pdf https://www.eastcambs.gov.uk/sites/default/files/C687%20Planning%20for%20suds.pdf_0.pdf	3 / Noted. Not amended. SUDS is addressed in the referenced Cambridgeshire Flood and Water SPD and Cambridge Sustainable Drainage Design and Adoption Guide.

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136	Cambridge Past, Present & Future / 5.5.13 - 17	5.5.13 - 17. This section refers to sustainable drainage. The availability of water of an adequate quality and volume is of crucial importance to both the protection of existing biodiversity and its future enhancement. It is disappointing that the SPD does not give greater emphasis to this as a headline issue. Planning decisions can influence the quantity and quality of water with further potential effects on biodiversity in a number of ways. For example, the use of streams and rivers to carry the outfall from sewerage treatment could have critical effects on wildlife. In addition, whilst water availability is, of course, a relevant constraint that the planning system should consider, the capacity of our watercourses to dispose of treated water waste is likely to be a more binding one. Furthermore, consideration must also be given to the, climate-change-induced, greater frequency of storm events. Without increased investment by the water authorities the frequency of storm events leading to raw sewerage being discharged is likely to increase, even at current levels of development. Another potential consequence of planning decisions is the demand for increased abstraction of better-quality water from aquifers leading to more pressure on vulnerable wildlife dependent on it. The guidance should highlight these key issues as they (and similar considerations) should be part of the policy framework within which development applications should be considered. This would also provide the proper context for subsequent references to development plan policies that reflect concern for the implementation and management of water conservation measures, for example in Local Development Framework North West Cambridge Area Action Plan October 2009 referred to in Appendix 1 page 68 of the draft SPD. Reference is also	6 / Noted. These comments are outside the scope of the SPD which does not set policy and are more relevant to the emerging Local Plan. The SPD has been subject to Strategic Environmental Assessment screening.

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		made at para 5.6.11. to the court case R (on the Application of Preston) v Cumbria County Council [2019] EWCA 1362. This indicates that planning and other competent authorities must carry out their own assessment for plan and projects with potential significant effects. Such an assessment would also include any 'in combination effects' of other plans and projects. The assessment of in combination effects is very relevant to development that could impact on water resources and should apply to all planning decisions that could impact biodiversity. In order to do this, system wide analysis and a subsequent monitoring framework are required to take accounts of effects both upstream and possibly downstream as well. Such assessments would also require analysis of effects at a catchment area which, of course, may cover different administrative boundaries. Again, the guidance should highlight this as part of the proper decision making process for development proposals.	
91	Hopkins Ecology / 5.5.14	5.5.14 requires all biodiversity records to be submitted to the Cambridgeshire and Peterborough Environmental Records Centre. This is a little too vague and should be defined to prevent the need for records of low value being submitted, e.g. common or ubiquitous birds or plants.	5 / Noted. The Councils consider that all biodiversity records are important. No change made to SPD.
241	RSPB / 5.5.14	5.5.14 - as above SUDS will not reduce the effects of development on the water environment without source control.	6 / Noted. SUDs design guide is referenced for detailed design.
242	RSPB / 5.5.15	5.5.15 - suggest including reference to public amenity in the last sentence	6 / Noted. No amendment, captured in referenced Cambridge Sustainable Drainage Design and Adoption Guide.

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243	RSPB / 5.5.16	5.5.16 - This and a multitude of other issues would be easily addressed if developments were to be designed with kerbside bioretention (rain garden) beds. As per page 21 of referenced guide. They are also a component of source control. Removal or opening of kerbs to allow contaminated run-off into a raingarden removes the need for gulley pots. Kerbs and gulley pots are barriers and death traps to wildlife.	6 / Noted. The SPD is not a design guide. The RSPB and WWT guidance is referenced to cover this point.
244	RSPB / 5.5.17	5.5.17 - This policy perhaps needs expanding on. This is not just an issue with paved gardens but also the public realm. The street scape has far too much 'dead space' of sealed surfaces. Much of this could be better utilised as rain gardens, tree pits or ideally combined raingarden and tree pits. This would reduce run-off, absorb and treat polluted water and airborne pollutants, assist in cooling the atmosphere and provide shade.	6 / Noted. It is not within the scope of the SPD to set new policy; rather it explains how Local Plan policies should be interpreted and applied and provides guidance.
100	Hopkins Ecology / Biodiversity Issue B7	5.5.18 The DEFRA Biodiversity Metric (2.0) referenced has been superseded (July 2021, 3.0). The SPD needs to be ‘future proofed’ against other releases of the tool.	6 / Noted. Text amended to reflect comments.

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123	The Wildlife Trust / Biodiversity Issue B7	Overall this BNG section should identify the need to develop a delivery mechanism for BNG in Greater Cambridge, and commit to its establishment either alone or in partnership with other LPAs. The delivery mechanism will include Local Nature Recovery Strategies to identify where to prioritise biodiversity offsetting and habitat banks, policies to set the expected % net biodiversity gain, policies for determining the precise geographical location of biodiversity offsetting in relation to planned developments, a mechanism for assessing, reviewing and monitoring BNG delivery, and a mechanism for allocating BNG funding to priority projects. The SPD could also potentially facilitate the advance creation of habitat banks within the Greater Cambridge area by providing guidance as to what landowners could do to register their sites, provide a baseline BNG assessment, set out the proposed new habitats and how they will be managed through a 30 year management plan, and provide evidence that the habitats have been created. Advance creation of habitat banks to provide biodiversity offsetting credits will help ensure the delivery of compensatory habitats in advance of losses. At present landowners will not do this due to the risks that they will not be able to claim biodiversity units as additional. In the absence of a national register (proposed in the Environment Bill), a local register could help bring forward beneficial biodiversity enhancements. Para 5.8.4 alludes to the above but could be significantly strengthened.	2 / Noted. The Councils are committed to working with partners on this issue, but this topic is not within the scope of the SPD.
174	MKA Ecology / 5.5.18	Para. 5.5.18: Update to 3.0	6 / Noted. Text amended to reflect comments.

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137	Cambridge Past, Present & Future / 5.5.18	5.5.18. and 5.5.26. The Council's target for net biodiversity gain over the 10% required by the Environment Bill is welcomed and fully supported given the scale of biodiversity losses in the past. See comment re para 1.1. above - further explanation of the scale of biodiversity losses in the SPD will help to support this argument. 5.6.8. The first stage of a Habitats Regulations Assessment is triggered by a plan or project that is likely to have significant effects not adverse effects as implied by the current wording. Assessment of whether adverse effects arise follows at the Appropriate Assessment stage.	5 / Noted.
245	RSPB / 5.5.18	5.5.18 - The metric version is now 3.0.	6 / Noted. Text amended to reflect comments.
77	Universities Superannuation Scheme / 5.5.19	Paragraph 5.5 19 of the Biodiversity SPD states that "the vision seeks a 20% level of Biodiversity Net Gain above predevelopment baseline conditions." It goes on to clarify that "whilst this Supplementary Planning Document does not set this as a figure or fixed target, this aspiration may have further support with the future enactment of the Environment Bill." USS notes that the Council's strategic vision seeks a 20% biodiversity net gain for all development types. USS also acknowledges that this goes above and beyond the 10% proposed in the emerging Environment Bill so it cannot be set as a minimum target in the Biodiversity SPD.	1 / Noted.
101	Hopkins Ecology / 5.5.19	5.5.19. It is noted that the vision for 20% net gain is not a requirement of this SPD and that any recommendations for a net gain of >10% (or the value within the Environment Act when passed) will only follow negotiation and discussion. It is assumed that where any greater gain is not practical then this will not be a requirement.	1 / Noted.

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195	University of Cambridge (Estates Division) / 5.5.19	We note the references in the draft SPD that local authority officers may also seek further Biodiversity Net Gain from development proposals, with a 20% BNG on-site figure specified. That would be significantly in excess of the 10% requirement that is likely to be introduced through the Environment Bill. If adopted as drafted, it would in effect result in the introduction of policy. Government guidance for plan-making is very clear on this matter - supplementary planning documents cannot introduce new planning policies into the development plan. Policy can only be introduced through the development plan documents, with the associated requirements for an evidence-based approach to feasibility and viability, and subject to independent examination. References to a potential future biodiversity net gain target, beyond that to be introduced by legislation, should be removed from the supplementary planning document in the meantime	1 / Noted. As addressed by the theme response, the SPD does not seek to impose new policy. Amendments have been made to clarify this point.
102	Hopkins Ecology / 5.5.20	5.5.20. The suggestion that off-site habitat measures to achieve net gain will be 'exceptional cases' is not necessarily agreed upon, and indeed it is likely to be far more consultation response frequent than suggested. Within the DEFRA Biodiversity Metric 3.0 achieving net gain on sites is difficult in some circumstances, and could potentially conflict with other design requirements, such as achieving high density development, particularly in urban areas such as Cambridge. The only mechanism suggested for off-site habitat measures is via S106 agreement. In practice this could be difficult for many developers to achieve, in particular on smaller schemes and for smaller developers who do not have access to suitable land. This point needs to allow for developers to use a range of providers to achieve off-site measures, including the use of financial	2, 6 / Noted. S106 agreement is currently the only legal method of securing offsite BNG.

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		payments to providers without the need for the location of measures to be identified at the application stage.	
115	The Wildlife Trust / 5.5.20	Biodiversity Issue B7 – Biodiversity Net Gain. Para 5.5.20 – The Wildlife Trust suggests removing “In exceptional cases”, because a degree of offsetting is likely to become the norm for most or a significant proportion of developments. On-site delivery of BNG cannot be guaranteed over the long-term, whether the 30 years as set out in the Environment Bill, or in perpetuity, which would intellectually be a more robust position. Monitoring and review of planning conditions is not routinely monitored or enforced and there seems little prospect of this changing. In this position a precautionary approach must be taken to assessing likely biodiversity gains and the type and condition of proposed habitats within a development site. This will result in a greater requirement for biodiversity offsetting sites and habitat banks, which can be legally secured, guaranteed and enforced.	2 / Agreed. Amended to 'Where onsite option for Biodiversity Net Gain have been exhausted, compensatory arrangements to provide shortfalls required and agreed with applicants under the vision can be provided offsite'.
246	RSPB / 5.5.20	5.5.20 - need to reference the future need to implement the LNRS here, which is likely to pull all of the mentioned documents together, creating a map of all existing spaces of importance AND future opportunities for habitat creation or restoration in a given area. In doing so this should effectively coordinate ALL environmental investment in that area, including developer investment into BNG.	6 / Noted. 5.5.25-26 refers to a strategic approach to habitat creation and enhancement, including making reference to Cambridge Nature Network and the emerging Nature Recovery Network.
257	RSPB / 5.5.20	5.5.20 - Support for acknowledgement of strategic net gain objectives that developers can contribute to (although these need to be governed by the eventual LNRS).	5 / Noted.

Rep ID	Respondent/SPD section	Representation	Theme/Response
116	The Wildlife Trust / 5.5.21	Para 5.5.21 – As discussed in 5.5.20 above, planning conditions are an ineffectual means of securing the long-term management, monitoring and review of biodiversity net gain habitats within development sites. Without legal certainty that a development will deliver the promised BNG habitats within a red-line boundary, a precautionary approach must be taken. The combination of paras 5.5.20 and 5.5.21 as currently worded will continue to result in net biodiversity losses from within development sites.	2 / Noted. S106 agreement currently the only legal method of securing offsite BNG.
247	RSPB / 5.5.21	5.5.21 - good to have reference here to long-term management. Suggest 'long-term management for nature' maybe more specific. Also need reference here to long term protection of these new habitats.	6 / Noted. Points covered within referenced BNG - Good Practice Principles.
186	Countryside Properties / 5.5.22	We note that the Defra Biodiversity Metric 2.0 has now been replaced by version 3.0. So that the SPD remains up to date if further revisions to the Metric are introduced, we would suggest that the SPD is updated to refer to the “Defra Biodiversity Metric 3.0 or any successor.”	5 / Noted. Text amended to reflect comments.
117	The Wildlife Trust / 5.5.24	Para 5.5.24 – This rightly identifies Biodiversity Net Gain as one of the primary mechanisms for the restoration of biodiversity across the UK. In light of this this section of the SPD needs to do more to facilitate it within the current planning policy and legal framework and the unknowns of the Environment Bill and subsequent secondary legislation.	2 / Noted. It is not within the scope of the SPD to set new policy; rather it explains how Local Plan policies should be interpreted and applied and provides guidance.
118	The Wildlife Trust / 5.5.25	Para 5.5.25 – The Wildlife Trust supports the recognition given to the Cambridge Nature Network in this paragraph (and 5.5.20).	5 / Noted.

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103	Hopkins Ecology / 5.5.26	Paragraph 5.5.26 suggests that a value of 20% net gain in biodiversity value will be required. This contradicts 5.5.19 which suggest that values greater than required by the Environment Act (when passed) will be following negotiation. Moreover, it is unclear what the justification is for seeking a net gain of 20% in Greater Cambridge. The implications of a 20% net gain are significant in terms of developable land on sites, with knock-on impacts to features such as the density of design. In most cases this would almost certainly require off-site measures, with the difficulties identified above being compounded in terms of 'finding and securing' suitable areas of enhancement.	6 / Noted. SPD amended to make clear that a value of 20% is likely to be encouraged as best practice.
104	Hopkins Ecology / 5.5.26	Table 3 shows how the current Biodiversity Metric 3.0 responds to different permutations of post-development vegetation, using simple assumptions: in the first assumption the developable area is 60%, with a low area of on-site landscaping (10%) and a high area of mixed scrub planting (30%). This achieves a 10% net gain, but to achieve a 20% net gain the developable area has been reduced to 50%, with an increase in ornamental planting to (20%). The key point is that achieving net gain significantly reduces developable areas, with the consequence that greater land areas will be required to achieve housing targets and that in practice many developments will require off-site measures. This could have significant implications for the emerging Greater Cambridge Local Plan with the implication that assumed site capacities may need to be significantly reduced and further sites and land identified to meet housing need.	1 / Noted. These comments relate to the Biodiversity Metric 3.0 rather than to the content of the SPD.

Rep ID	Respondent/SPD section	Representation	Theme/Response
105	Hopkins Ecology / 5.5.26	Table 3. Examples of the net gain achievable for a 1ha arable site and different post development conditions. Baseline Post-development Net gain% Habitat Area Arable Developed land; sealed surface 0.6 +10% Introduced shrub 0.1 Mixed scrub 0.3 Arable Developed land; sealed surface 0.5 +19.8% Introduced shrub 0.2 Mixed scrub 0.3 The implications of a 20% net gain could include a requirement for additional land for the delivery of current housing targets with implications to the number of currently allocated sites. Within emerging plans it would require additional land to be allocated.	1 / Noted. These comments relate to the Biodiversity Metric 3.0 rather than to the content of the SPD.
157	Natural England / 5.5.26	We welcome reference to the Cambridge Nature Network and the wider Nature Recovery Network (NRN). Perhaps further consideration could be given to the key objectives of the NRN, and opportunities for developers to contribute towards its delivery, through proposed updates to the SPD when the Environmental Bill is enacted.	6 / Noted. The Councils will continue to engage with Cambridge Nature Network through the emerging Greater Cambridge Local Plan Biodiversity and Green Spaces theme, to support delivery of shared biodiversity ambitions for Greater Cambridge.
175	MKA Ecology / 5.5.28	Para 5.5.28: I think the suggestion here is that a net gain calculation will not be required until the new small site metric is available. It could provide more clarity if it expressly says this is the case?	6 / Noted. Small site metric is now available and referenced.
119	The Wildlife Trust / 5.5.28	Para 5.5.28 – The Small Sites Metric has now been published, though in beta testing form, since the publication of this SPD, so this para could be updated to represent the situation as of Sept 2021.	2 / Noted. Small site metric is now available and referenced.

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78	Universities Superannuation Scheme / 5.5.29	Paragraph 5.5.29 of the Biodiversity SPD states that for major applications, a Biodiversity Gain Plan will be expected. Whilst USS supports this aim, it should be proportionate to the potential of specific sites. For example, the Site is in a highly sustainable brownfield location which the Biodiversity SPD states is likely to have limited potential for increasing biodiversity. If the Biodiversity SPD is too prescriptive on this issue it may restrict the ability of the Site to provide housing or employment uses in a highly sustainable location. USS therefore requests that paragraph 5.5.29 clarifies that Biodiversity Net Gain Plans should be proportionate to the circumstances of individual sites. The Biodiversity SPD should also recognise that whilst Biodiversity Gain Plans are normally based on the Defra Biodiversity Metric calculation spreadsheet, this is not required by the National Planning Policy Framework and is not always the most appropriate mechanism in complex circumstances, so it should be decided on a case-by-case basis.	1 / Noted. Not amended. Minimum 10% BNG is statutory for all development and DEFRA Metric is industry standard for assessing BNG requirements. Any justifiable variation can be agreed on a case-by-case basis.
148	Natural England / 5.5.29	Section 5.5.29. should now refer to the recently published Biodiversity Metric 3.0 which updates and replaces the beta Biodiversity Metric 2.0.	6 / Noted. Text amended to reflect comments.
248	RSPB / 5.5.29	5.5.29 - suggest 'steps taken to avoid impacts on biodiversity' here need to include how they have implemented the mitigation hierarchy	6 / Noted. Amend 5.5.30 to include mitigation hierarchy.
121	The Wildlife Trust / 5.5.30	Para 5.5.30 – This paragraph should specifically reference the Cambridge Nature Network which is more comprehensive that the Opportunity Mapping referred to and is one of six priority landscape areas identified by Natural Cambridgeshire for delivery of a Nature Recovery Network locally. The West Cambridgeshire Hundreds and part of the Great Ouse Valley are also within the Greater Cambridge planning area.	6 / Noted. Text amended to reflect comments.

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120	The Wildlife Trust / 5.5.30	Para 5.5.30 – This para should specify that BNG habitats need to be provided for a minimum of 30 years, in line with proposals in the Environment Bill, though intellectually they should ideally be provided in perpetuity, if BNG is to be delivered.	2 / Noted. Paragraph 5.8.4 notes that the Environment Act 2021 will require an audit trail for the delivery of Biodiversity Net Gain commitments for a period of up to 30 years.
249	RSPB / 5.5.30	5.5.30 - management, monitoring and remediation is great, but also need information on how the new habitats will be protected long term.	3 / Noted. All BNG provision will be protected and managed for a minimum of 30 years as per Environment Act.
122	The Wildlife Trust / 5.5.31	Para 5.5.31 – The second sentence of this para is ambiguous. It should clearly state that the baseline for habitats will be taken as 30 January 2020, or the nearest prior aerial photographic evidence or survey. The current wording would in theory allow the destruction of a County Wildlife Site in Cambridge City 2013 to stand and for a zero value BNG baseline, when aerial photos from 2012, combined with detailed survey from 2005, could be used to demonstrate the value of the site prior to clearance. There should also be reference to the use of the precautionary principle in assessment of habitats that fall within this scenario.	6 / Noted. Text amended to reflect comments.
226	National Trust / 5.6 Application Stage	5.6 Application stage - Validation requirements: Whilst all the Biodiversity Issues listed are important, B9 and B10 are of particular interest to the National Trust with reference to our land at Wicken Fen and the Wimpole Estate.	5 / Noted.

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176	MKA Ecology / 5.6.4	Para. 5.6.4: Also reference CIEEM's guidance on report writing here, or previously? https://cieem.net/resource/guidelines-for-ecological-report-writing	6 / Noted. Text amended to reflect comments.
250	RSPB / Biodiversity Issue B8	Page 50 - 1st para - you mention that applicant information needs to include 'details of mitigation measures to avoid adverse effects on the integrity of the site(s) embedded into design of the development'. Suggest you need to define the term 'embedded' here, as care needs to be taken in the context of the Sweetman ruling that we are not taking into account 'standard' mitigation at the screening stage.	6 / Noted. No amendment proposed as links provide detailed government guidance on process.
149	Natural England / Biodiversity Issue B8	Natural England suggests minor amendments to two parts of the first paragraph of Biodiversity Issue B8 – Habitats Regulations to read as follows: To support the councils in meeting policy requirements (NH/5 and Policy 69) and their legal duties, as Competent Authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended) – known as the Habitats Regulations - where development is likely to result in a significant effect on a Habitats site, proposals need to be supported by information to support preparation of the Habitats Regulations Assessment (HRA) by the Local Planning Authority. In accordance with the requirements of the Habitats Regulations the Councils' will seek Natural England's views on all HRA Appropriate Assessments and will have regard to any representation made by Natural England in issuing its decision.	6 / Noted. Text amended to reflect comments.
150	Natural England / 5.5.9	We suggest the last sentence of paragraph 5.6.9 is amended to read along the following lines: This is an 'appropriate assessment' of the implications for that site in view	6 / Noted. Text amended to reflect comments.

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		of that site's conservation objectives. Consent can only be granted when it can be ascertained by an appropriate assessment that there will not be an adverse effect on the integrity of a European Site unless, in the absence of alternative solutions, there are imperative reasons of overriding public interest and the necessary compensatory measures can be secured.	
151	Natural England / Biodiversity Issue B9	Biodiversity Issue B9 - Natural England supports development of a protocol to ensure that relevant development is accompanied by appropriate levels of survey, assessment and mitigation with regard to potential impact on the barbastelle bat population of the SAC. This will support the Councils in meeting policy requirements (NH/5 and Policy 69) and their legal duties under the Habitats Regulations to protect the SAC.	5 / Noted.

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227	National Trust / Biodiversity Issue B9	Biodiversity Issue 9 - Recreational pressure on SSSIs: Cambridgeshire is one of the fastest growing areas in England. Development inevitably gives rise to a range of off-site impacts, and these often include visitor related impacts on wildlife habitats and biodiversity. We wish to inform Greater Cambridge Planning that the SSSI, SAC and Ramsar sites at Wicken Fen are under increasing recreational pressure as a result of the significant increase in housing and population in the Cambridge area. Wicken Fen Ramsar site is mentioned as being subject to a detailed study from which a new Zone of Influence is emerging (para. 5.6.21). We are unclear as to the study this is referring to and would welcome further clarification. We would welcome discussions about a Zone of Influence for Wicken Fen either as part of the development of this SPD or in relation to the emerging Local Plan. In 2019 the National Trust commissioned consultants Footprint Ecology to undertake visitor surveys to help us better understand the people and communities who visit and experience Wicken Fen nature reserve and the surrounding area. This information is being used to help us plan for the future through the Wicken Fen Vision, increasing the relevance of our work to local communities and the resilience of the nature reserve to changes happening within and around it. It is also being used to inform our responses to local plan and planning application consultations (notably it has been used in our response to the proposed development at Waterbeach New Town). Recreational pressure at Wicken Fen is a significant issue for nature conservation and we therefore request that this is recognised in the SPD.	6 / Noted. The Councils refer in the SPD to Natural England's evidence of SSSIs currently known to be at risk from recreational pressure. Development of a policy approach is appropriate for the emerging Greater Cambridge Local Plan rather than this SPD. 5.6.21 references Impact Risk Zones for Wicken Fen and the need to seek advice from National Trust as per comments received. Wicken Fen Vision now also referenced in Section 3.6.10.

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		We welcome the inclusion of the suggestion that applicants of developments within the Impact Risk Zone of Wicken Fen SAC should seek advice from the National Trust regarding potential recreational pressure impacts and mitigation measures. However, the draft document does not mention Wimpole Estate's sensitivity to recreational disturbance. Significant work by the National Trust is ongoing to manage the visitor impacts on the site in relation to preventing damage to woodland habitat that supports bats (Eversden and Wimpole Woods SSSI/SAC). We would welcome inclusion of suggestion that applicants of developments within the Impact Risk Zone of Eversden and Wimpole Woods SSSI/SAC should seek advice from Natural England and the National Trust regarding potential impacts and mitigation measures. However, in order to secure appropriate mitigation, the recognition of recreational impacts needs to be underpinned by an evidence-based policy within an up-to-date Local Plan. We consider that a policy is required in either the new Local Plan or this SPD (or a reference in this SPD for the requirement of a Local Plan policy). In our view developers should consider, and where appropriate contribute towards, mitigation measures which are necessary to alleviate the impact of recreational use likely to arise from development. We would welcome further dialogue with the Council and Natural England on this matter.	
192	Cambridgeshire County Council Ecology / Biodiversity Issue B9	Biodiversity Issue B9: Eversden and Wimpole Woods SAC. We would recommend reviewing this section following the findings of the detailed survey work and assessment for the A428 examination.	6 / Noted. Not amended. The information from these surveys has come too late in the process of preparing the SPD to account for them.

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152	Natural England / 5.6.17	Section 5.6.17 states: All development within 5 km of the Special Area of Conservation designated site is considered by Natural England as a key conservation area with a 10 km sustenance or wider conservation area. Please note that Natural England is currently reviewing the Impact Risk Zone (IRZ) for Eversden and Wimpole Woods with a view to potentially extending this to 20km from the SAC boundary. This aims to ensure a more precautionary approach to the protection of the barbastelle population from the effects of development alone and in-combination. The extent of the IRZ will be informed by the findings of emerging SAC barbastelle tracking surveys being undertaken for major development schemes. It will also take into consideration the availability of suitable foraging resource which is considered to be quite scarce in the local area. As noted in section 4.2.3 of the SPD barbastelles can forage 20km and beyond, dependent on a range of factors including the availability of suitable foraging habitat. In the meantime, until the IRZ is formally amended, and accompanying guidance prepared, we suggest that the Eversden and Wimpole Woods Special Area of Conservation Bat Protocol should apply to all relevant development within 20km of the SAC.	6 / Noted. Text amended to reflect comments.
86	Hopkins Ecology / 5.6.18	5.6.18 is not complete	6 / Noted. Text amended to reflect comments.
193	Cambridgeshire County Council Ecology / 5.6.18	Figure 12: We understand from the A428 project ecologist, that some of the hedgerow connections identified on Figure 12 are not found on the ground. It would be helpful to have an interactive map / flexibility to update the map if more detailed information becomes available / more strategic hedgerows are established or bolstered.	6 / Noted. Not possible to accommodate such a map within the PDF.

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229	National Trust / 5.6.18	We note that Figure 12 in the draft document refers to the Eversden and Wimpole Woods SAC. Some place names or points of reference on this map would be useful to better understand where the Impact Risk Zones extend to.	6 / Noted. Figure not amended due to scale of figure and legibility.
153	Natural England / Biodiversity Issue B10	Biodiversity Issue B10: We suggest the last sentence of the first paragraph be amended to read: SSSIs currently known to be at risk from recreational pressure within the Greater Cambridge area are listed in Annex B of Natural England's advice.	6 / Noted. Text amended to reflect comments.
178	MKA Ecology / Biodiversity Issue B10	Biodiversity Issue B10: Recreational pressures also have significant impacts on non-statutory sites. Is it feasible to highlight this issue and make recommendations/advice?	6 / Agreed. New para inserted after 5.6.22.
155	Natural England / Biodiversity Issue B10	Natural England otherwise supports the guidance on assessing and mitigating recreational pressure impact to sensitive SSSIs and signposting developers to Natural England's guidance and further advice through the Discretionary Advice Service.	5 / Noted.
228	National Trust / Biodiversity Issue B10	We welcome the advice by Natural England and its inclusion in this document that proposed residential developments of 50 or more units should seek to provide sufficient Suitable Alternative Greenspace (SANG) to avoid and mitigate recreational pressure within or around SSSI's. However, it is important to recognise that this is not always able to deliver the features, experiences or offer that other established sites can (such as Wicken Fen) and that there may be a residual recreational impact which requires mitigating.	5 / Noted.

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154	Natural England / 5.6.21	We welcome the guidance in section 5.6.21 in relation to Wicken Fen; however, it is not quite correct, and potentially risky, to suggest that Fenland SAC SSSIs are not considered to be at significant risk from recreational pressure. These SSSIs include habitats that are highly sensitive to visitor pressure; however, they generally experience low levels of access, due to distance from major populations, which can be safely accommodated within the existing management regime for the site. Additional recreational pressure, through new housing development, would pose a potentially significant risk to these sensitive sites. We would therefore recommend removal of reference to the Fenland SAC SSSIs.	6 / Noted. Amended to remove reference to Fenland SAC SSSI.
138	Cambridge Past, Present & Future / 5.6.22	5.6.22. The discussion of the use of Suitable Alternative Natural Greenspace (SANG) to avoid and mitigate recreational pressure within and around important nature conservation sites is noted. It is also stated that: 'Whilst current Local Plan policies do not set requirements in respect of SANG, developers need to consider how to implement this detailed advice from Natural England, in conjunction with the councils' Open Space standards to provide access to sufficient greenspace to meet daily recreational needs of new residents.' Recreational pressure on sensitive wildlife sites is only likely to increase and it is vital that other adequate alternative greenspace is provided and secured to avoid any adverse effects. Whilst it is appreciated that current Local Plan policies do not set out requirements in respect of SANG, Local Authorities should also take the lead in future development plans with clear overarching policies that provision of SANG may be required for certain residential developments. This should be reflected as clear statement of intent in the SPD.	6 / Noted. It is not within the scope of the SPD to set new policy. The emerging Local Plan will consider how best to address this issue in new policies.

Rep ID	Respondent/SPD section	Representation	Theme/Response
146	Natural England / 5.6.22	We support signposting developers through Natural England Discretionary Advice Service (DAS) for pre-application advice but suggest re-wording, and additional text, along the following lines: Developers wishing to seek advice on more complex proposals affecting the natural environment, particularly Sites of Special Scientific Interest, should be directed to Natural England's Discretionary Advice Service (DAS) – link supplied. For advice on proposals that will require a protected species mitigation licence developers can use Natural England's Pre-submission screening service – link supplied	6 / Noted. Reference to Protected Species screening service inserted into Para 4.4.4.
179	MKA Ecology / 5.6.24	Para. 5.6.24: Is it worth making it clear that this applies for outline applications too? We are often asked this question by clients. My view is that all impacts need to be assessed even for outline, otherwise how can consent be agreed in principle?	6 / Noted. Text amended to reflect comments.
251	RSPB / 5.6.25	5.6.25 - this looks good but need to be careful with this wording and approach regarding proposals that might impact Habitats Sites. In this context, compensation is something that would not be embedded in the proposal, but a separate consideration once impact has been defined.	6 / Noted. No amendment proposed. The Councils consider that making amendments at the designation level would be too specific for an SPD.
258	RSPB / 5.6.25	5.6.25 - Support the need to undertake all necessary surveys before determination. No dealing with potential unknown impacts through conditions.	5 / Noted.

Rep ID	Respondent/SPD section	Representation	Theme/Response
79	Universities Superannuation Scheme / 5.7.2	Paragraph 5.7.2 of the Biodiversity SPD states that a "A Construction Environment Management Plan: Biodiversity will be required by condition for many developments". USS acknowledges that this type of condition will likely be required for sites with high levels of biodiversity. USS recommends that to avoid confusion, paragraph 5.7.2 is amended to state "A Construction Environment Management Plan: Biodiversity will be required by condition for many developments. The requirement for and timing of this will be decided on a case-by-case basis". This construction element could also be covered in an Ecological Management Plan that is submitted with a planning application, which would negate the need for a planning condition. The Biodiversity SPD should identify that where this approach is taken it should be agreed between the applicant and the Council at the pre-application stage.	6 / Noted. Text amended to reflect comments.
156	Natural England / 5.8 Post Construction	We support guidance and reference to requirements for long-term management, monitoring and remediation of ecological mitigation and enhancement measures set out in section 5.8. Guidance on zoning within sites to manage potential biodiversity and recreational conflicts is also welcomed.	5 / Noted.

Rep ID	Respondent/SPD section	Representation	Theme/Response
139	Cambridge Past, Present & Future / 5.8.1. - 5.8.4	5.8.1. - 5.8.4. This section of the SPD refers to management plans, monitoring and enforcement. This area of work is of critical importance to ensure that the effectiveness of mitigation or compensation for potentially damaging developments that otherwise might have been refused. There are two issues that are particularly relevant. First, with regard to biodiversity net gain, the current use of the Defra metric focuses on the provision of habitat. This may be used to mitigate effects or secure enhancement for species directly affected by a development. However, to ensure that species affected will benefit from habitat provision requires careful monitoring - simply creating new habitat will not necessarily mean the species affected will use it. Second, the emerging Environment Bill may indicate an audit trail for the delivery of Biodiversity Net Gain commitments for a period of 30 years, but this should not be taken as a cut-off date after which nothing further is required. For example, if compensation is required for the permanent loss of an important wildlife site and this requires permanent management funding, it should be provided in perpetuity, e.g. through a ring fenced lump sum of money. This reflects the logical principle that permanent loss requires permanent recompense. Furthermore, Local Authorities have the power through separate legal agreements with developers to ensure this happens. The guidance should thus make it clear that commitments in perpetuity may also be required. I am very happy to discuss any of the points raised in our comments further. I trust that you will take our comments into consideration.	2 / Noted. No amendment proposed. Monitoring is included within the SPD and the EA secondary legislation will embed the 30-year BNG commitment. Where specific species issues arise, these may require additional mitigation and monitoring to the BNG requirement. The case for 'in perpetuity' is one of Policy and cannot be set within this SPD.

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180	MKA Ecology / 5.8.2	Para. 5.8.2: Is it feasible to include monitoring of habitats by condition too – appears to be restricted to species here. I'm thinking specifically of sites such as GB1 and Netherhall Meadow. Really that will need some careful monitoring to ensure there is no deterioration in the long-term.	6 / Noted. No amendment. Habitat monitoring is referenced in 5.8.3 through management plans.
72	Universities Superannuation Scheme / General comment	USS also notes, however, that there are often opportunities to improve biodiversity on brownfield sites which are brought forward for redevelopment; particularly those with low existing ecological values. USS requests that the Biodiversity SPD is updated to recognise that brownfield sites can contribute to wider high strategic potential for habitat creation by providing links to green corridors or linking up wildlife corridors for example.	6 / Noted. Text amended to reflect comments.
181	MKA Ecology / General comment	Further element for consideration: Amphibians and drains: We talked about this in the past but previously I've not been able to find any material on it. However, I've found this ARGUK document which refers to the wildlife friendly kerbs (p15) https://www.arguk.org/info-advice/scientific-and-technical-reports/72-toads-advice-for-planners/file	6 / Agreed. Link inserted in 5.5.16.
182	MKA Ecology / General comment	Further element for consideration: Lighting: There doesn't seem to be a reference to sensitive lighting. Would there be value in referencing the ILP/BCT guidance? https://cdn.bats.org.uk/uploads/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?v=1542109349	6 / Agreed. Link inserted in 5.5.9.
183	MKA Ecology / General comment	Further element for consideration: Air quality: Could there be some value in highlighting that air quality impacts will need to be assessed in some circumstances? You could reference the CIEEM air quality guidance? https://cieem.net/wp-content/uploads/2020/12/Air-Quality-advice-note.pdf	6 / Noted. No amendment. Covered within Environmental Health Policy and Guidance.

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194	University of Cambridge (Estates Division) / General comment	Guidance in the SPD is generally clear, with the exception of the issue around a potential 20% biodiversity net gain target in advance of any such target being adopted in the Local Plan. See further detail in response to survey Question 5 (under 5.5.19).	1 / Noted. Response made separately to detailed comments.
80	Universities Superannuation Scheme / General comment	In summary, USS is supportive of the ambitions of the Biodiversity SPD. However, USS has specific comments regarding several sections of the Biodiversity SPD as set out in this letter. USS requests that these are considered and addressed before the final Biodiversity SPD is published and adopted. USS is pleased to have the opportunity to comment on the Biodiversity SPD and requests to be kept informed of future updates.	5 / Noted. Response made separately to detailed comments.
125	Cambridge Past, Present & Future / General comment	We welcome the publication of the Draft Biodiversity Supplementary Planning Document (SPD) and the opportunity to comment on it. It provides useful guidance but should be strengthened further, as recommended in our comments below. This applies particularly to: • the description of the importance of biodiversity in terms of past losses; • development connected with agriculture; • issues arising with regard to mitigation and compensation; • baseline dates for establishing ecological value of sites; • the need to highlight the implications of development decisions on water resources; • provision of Suitable Alternative Greenspace (SANG); • securing mitigation, compensation and biodiversity net gain.	5 / Noted. Response made separately to detailed comments.

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142	Natural England / General comment	Natural England welcomes preparation of the draft Greater Cambridge Biodiversity SPD (July 2021) to replace the South Cambridgeshire Biodiversity SPD, adopted in 2009, to help applicants meet the policies of the Cambridge City and South Cambridgeshire Local Plans and relevant national policy and legislation. We are pleased that the SPD provides clear guidance on how developments should consider biodiversity early in the planning process to ensure that biodiversity is increased and enhanced as an outcome of development. The aim to ensure improved quality of new developments whilst reducing environmental impact is fully supported by Natural England, particularly in light of the biodiversity and climate emergencies declared by both Councils and the 20% Biodiversity Net Gain (BNG) ambition of the Oxford to Cambridge (OxCam) Arc.	5 / Noted.
143	Natural England / General comment	We welcome recognition of the multi-functional benefits of enhanced biodiversity including improved habitats for species, flood protection, carbon sequestration as well as the broader secondary benefits for people, like improved mental health from access to natural green spaces.	5 / Noted.
184	Countryside Properties / General comment	Countryside are supportive of the preparation of the SPD which will provide helpful clarity on the Councils' aspirations. There are however a series of detailed comments we wish to make on the SPD to further aid this clarity and the ease of interpretation of the SPD.	5 / Noted.
191	Cambridgeshire County Council Ecology / General comment	We support the proposed document, which provides clarity on the importance of biodiversity conservation in Greater Cambridge and how applicants will need to demonstrate adequate ecological design and assessment.	5 / Noted.

Rep ID	Respondent/SPD section	Representation	Theme/Response
196	University of Cambridge (Estates Division) / General comment	Do you think that the guidance in this SPD is clear? Generally, yes, with the exception of the issue around a potential 20% biodiversity net gain target in advance of any such target being adopted in the Local Plan. See further detail in our response to Question 5 (under 5.5.19)	1 / Noted.
198	University of Cambridge (Estates Division / General comment	Do you think that this SPD will help us achieve the positive outcomes for biodiversity required by national legislation and our adopted Local Plans? Yes	5 / Noted.
199	University of Cambridge (Estates Division) / General comment	The University supports the majority of the proposals in the SPD.	5 / Noted.
200	University of Cambridge (Estates Division) / General comment	There is clear alignment between the draft SPD and the University's Biodiversity Action Plan (BAP) in relation to a science-based approach to for biodiversity net gain.	5 / Noted.
213	Cambridgeshire Local Access Forum (CLAF) / General comment	CLAF welcomes this opportunity to provide input into the GC Biodiversity Supplementary Planning Document and how it might be revised and improved to better reflect the existing and potential future use of the non-motorised transport network across the county. We recognise that it's a very comprehensive plan, with a lot of concern for biodiversity, historical sites, and conservation. We are also pleased to see and support policies that aim to protect, enhance and develop the rights of way network providing a network of routes to promote walking, cycling and riding and to point out that circular routes, or routes that link with others, are particularly recommended.	5 / Noted.

Rep ID	Respondent/SPD section	Representation	Theme/Response
215	Historic England / General comment	Given the nature of the SPD and our remit for the historic environment we do not wish to comment on the SPD itself.	5 / Noted.
216	Individual - name provided / General comment	It is a thorough well written paper, which should answer many questions for those seeking planning permission.	5 / Noted.
217	Individual - name provided – General comment	It is long and complex with many references to other legislation and reports. It may be impractical, but would it be feasible to include a case study for a relatively simple situation?	3 / Noted. Examples of good practice and design case studies will be shared on the Greater Cambridge Shared Planning website.
220	Individual - name provided / General comment	I did not see mention of changes in protected species. What would happen if Barbastelle bats became plentiful, but another species became threatened with extinction?	6 / Noted. Not amended. Species populations change over time – significant changes would have to be dealt with as they arose. The SPD is addressing the issues in biodiversity as they stand today.

Rep ID	Respondent/SPD section	Representation	Theme/Response
222	Ministry of Defence / General comment	Having reviewed the supporting documentation in respect of Greater Cambridge Draft Biodiversity Supplementary Planning Document, there is one area of interest for the MOD. The DIO safeguarding area of interest is Cambridge Airport. Within the statutory consultation areas associated with aerodromes are zones that are designed to remove or mitigate bird strike risk. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect, this can include landscaping schemes associated with large developments as well as the creation of new waterbodies and drainage systems. Several areas are demonstrated within the 5.5 Design Stage of the Biodiversity Supplementary Planning Document to contain policy which potentially could lead to new habitats for attractant birds. For example: Biodiversity Issue B5 –Biodiversity provision in the design of new buildings and open spaces:5.5.5." Design of new developments should seek to retain habitats of value to biodiversity wherever possible. Even for small scale developments, this would include boundary hedgerows, trees and any pond on site and these can provide the framework for the setting of the scheme layout". The impact of the biodiversity development of the majority of these areas could be simply controlled by policy text that highlights the existence of safeguarding zones, that are designated to mitigate bird strike risk. In summary, the MOD would wish to be consulted on any proposed development within the Greater Cambridge Draft Biodiversity Supplementary Planning Document of any development which includes	6 / Noted. MOD are statutory consultees on all developments within the Cambridge Airport Safety Zone.

Rep ID	Respondent/SPD section	Representation	Theme/Response
		schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation.	
230	National Trust / General comment	There is little mention of the Cambridge Green Belt in the draft SPD. We consider that this has opportunities for enhancing biodiversity.	3 / Noted. The Councils consider that referencing the Green Belt within the SPD would not enhance the substance or clarity of the SPD.
252	RSPB / general comment	Additional case studies: Guessing you know about the 2019 CIRIA guidance, which includes case studies: https://www.ciria.org/Resources/Biodiversity_Net_Gain.aspx	3 / Noted. Examples of good practice and design case studies will be shared on the Greater Cambridge Shared Planning website.
219	Individual - name provided / Appendix 1	Appendix 1 Policy CSF/5: Noise abatement is hugely important; see CSF/5. I now live overlooking Trumpington Meadows. The noise from the M11 is disturbing, particularly when the winds come from the South West, which are the prevailing ones. There is an earth bank but it stops well sort of the river, although its interference with flooding seems remote. The former manager of Cambridge Past Present and Future told me that	5 / Noted.

Rep ID	Respondent/SPD section	Representation	Theme/Response
		offset baffle fences work well in Germany but she had not seen them in Britain.	
211	Anglian Water / Strategic Environmental Assessment	Strategic Environmental Assessment (SEA) Pages 22, 34 and 35: It is not evident how negative water quality impacts on biodiversity from development which the SPD will be applied to have been descoped from the SPD assessment. It is feasible that a decision to enhance terrestrial biodiversity may have negative impacts on fluvial biodiversity that still on balance leads to a net gain in biodiversity which complies with the SPD policy. This position is summarised at bullet point 4 of section 4.4.2 of the SEA and so presents an inconsistency in the SEA.	SEA: Noted. The approach to BNG is set out in the Environment Act and is applied at the design and application stage by professionals to ensure that there will not be negative impacts on biodiversity. The SPD does not affect this issue and so the point is not relevant to the SEA. Bullet point 4 of section 4.4.2 of the SEA refers to development plans, which SPDs don't form part of. 4.4.2 goes onto state that "as the SPD is aimed at supporting biodiversity within South Cambridgeshire District and Cambridge City areas, the SPD ensures that

Rep ID	Respondent/SPD section	Representation	Theme/Response
			development that will not have a significant negative effect on designated sites and Qualifying features".
212	Anglian Water / Strategic Environmental Assessment	Strategic Environmental Assessment (SEA): - It is not evident how the SPD objectives (from the SPD or SEA) will impact on the viability of development or require some element of readjustment of land values to enable delivery. (NPPF para 34 and 58). The SEA should identify other mechanisms and funding for delivering BNG such as the Water Industry National Environment Programme (WINEP).	SEA: Noted. These comments are outside the scope of the SPD which does not set policy. Funding and delivery mechanisms for biodiversity enhancements are outside the scope of both the SPD and SEA.
214	Historic England / Strategic Environmental Assessment	Strategic Environmental Assessment (SEA) Screening: In terms of our area of interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing Policies contained within an Adopted Development Plan Document which has already been subject to a Sustainability Appraisal/SEA. As a result, we would endorse the Authority's conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD.	SEA: Noted.

Appendix F: Biodiversity Supplementary Planning Document: text changes between consultation draft (July 2021) and proposed final version ahead of committee processes (December 2021)

Points to note:

- Inserted and deleted text is shown in purple underline and ~~strikethrough~~
- This document identifies substantive changes between the draft and proposed final version. The proposed final version attached to the committee reports may include additional very minor (non-substantive) wording and numbering changes
- The contents, foreword, table of figures and images from the draft plan and proposed final versions have been deliberately excluded from this document. Paragraph numbers may not exactly match the draft and proposed final versions.
- As a tracked change document it has not been practicable to make this document accessible to e-readers.

1.1. Introduction

1.1.1. Biodiversity, a term coined in 1985 as a contraction of “biological diversity” describes the variety of life on Earth, in all its forms and all its interactions. It incorporates all species and habitats, both rare and common, and includes genetic diversity. Biodiversity at local, national and global levels is under pressure as never before from climate change, habitat loss, species decline, and the threat of invasive species. Much of the habitat loss is driven by urban development fuelled by the need for housing and infrastructure. Species once considered to be common in Greater Cambridge are facing increasing stresses upon their populations and the rate of species loss has never been higher. International initiatives exist to reduce the rate of species loss and at the national level lists of species and habitats that require particular measures to halt their decline have been produced.

1.1.2. Our goal in Greater Cambridge is to build quality places, rich in biodiversity and green infrastructure, good for people and good for nature. Both Cambridge City Council and South Cambridgeshire District Council have declared a biodiversity emergency, and strongly support a step change in the protection and enhancement of biodiversity in Greater Cambridge. The aim to better protect, restore and enhance our natural environment is clearly set out in the Environmental Principles, regionally agreed for the Oxford to Cambridge (OxCam) Arc development vision. These Environmental Principles seek to set ambitious goals, including the desire to realise Biodiversity Net Gain (BNG) at 20% for all development types within the Arc. This approach is further supported in more local initiatives like South Cambridgeshire’s Doubling Nature Strategy and Cambridge City’s upcoming Biodiversity Strategy. Together, these documents set the tone for greater aspiration and more robust biodiversity policies in the emerging Greater Cambridge Local Plan.

1.1.3. As development forms one of the largest threats to biodiversity through the loss of natural habitats, it is incumbent on planning authorities and developers to recognise the importance of biodiversity protection and enhancement through provisions made in Local Plan policies, and through the enforcement of relevant

national legislation. However, we can only do that if developments coming forward incorporate the correct elements from the beginning of the design process through to their build out.

1.1.4. Enhancing biodiversity through the planning and development process brings numerous benefits. These will include, but not be limited to, improved habitats for species, flood protection, carbon sequestration as well as the broader secondary benefits for people, like improved mental health from access to natural green spaces.

1.1.5. Going forward, biodiversity will not be peripheral to the planning process but will be fully integrated into the design stages. Consideration will be given, wherever possible, to the retention of biodiversity features within developments and to incorporating new habitats or specific biodiversity features into designs.

1.1.6. Biodiversity is a valuable addition to any development, often helping to create attractive natural green spaces which integrate development of a high-quality design into the local landscape or townscape.

1.2. Status of the Biodiversity Supplementary Planning Document

1.2.1. When adopted, this draft Supplementary Planning Document will support existing policies for both South Cambridgeshire District Council and Cambridge City Council ahead of the adoption of a Greater Cambridge Local Plan, which is in preparation jointly by both authorities.

1.2.2. This Supplementary Planning Document provides practical advice and guidance on how to develop proposals that comply with the National Planning Policy Framework and the district-wide policies in the South Cambridgeshire Local Plan, adopted in September 2018, as well as those in the Cambridge Local Plan, adopted in October 2018. It also references policies in individual Area Action Plans for major developments, which may vary from the policies in the two adopted Local Plan documents.

1.2.3. The existing policies seek to ensure that biodiversity is adequately protected and enhanced throughout the development process. This Supplementary Planning Document provides additional details on how local policies will be implemented while also building on relevant legislation, national policy, central government advice, and the British Standard BS42020:2013 Biodiversity – Code of practice for planning and development. Available information about the contents of the ~~emerging Environmental Bill has been referenced and, after adoption, this Supplementary Planning Document will be updated once the Bill becomes an Act.~~ Environment Act 2021 has been referenced.

1.2.4. This Supplementary Planning Document will supersede the South Cambridgeshire Biodiversity Supplementary Planning Document, adopted in 2009 to support adopted Development Control Policies. It will in time be updated to support the Greater Cambridge Local Plan when this is adopted.

1.3. Purpose

1.3.1. The objective of this Supplementary Planning Document is to assist the delivery of the Local Plan policies for both Councils relating to the conservation and enhancement of biodiversity.

1.3.2. The Supplementary Planning Document does not create policy, but explains how Local Plan policies should be interpreted and applied and provides guidance, setting out with clarity, the expectations that the Councils have for the treatment of biodiversity within the development management system and how those should be reflected by developers, their agents and their consultants in their submissions.

1.3.3. Reference is made throughout, with links where appropriate, to other available guidance that can help to direct and refine the design of development sites to ensure that opportunities for the conservation and enhancement of biodiversity are incorporated from the very start of the development process.
Specific objectives for this document are:

- To explain terminology associated with biodiversity conservation to assist applicants' understanding of the importance of biodiversity within the wider environment of Greater Cambridge
- To be clear on the ways in which development proposals in Greater Cambridge can be formulated in an appropriate manner to avoid harm to biodiversity and to provide a long-term, measurable net gain for biodiversity
- To encourage applicants to protect, restore and enhance locally relevant natural habitats and ecological features on their sites and to create new habitats, as part of a high-quality design
- To assist applicants to gain planning permission in Greater Cambridge more quickly by informing them of the level of information expected to accompany planning applications

2 UK legislation

2.1. Current legislation

2.1.1. In their planning submissions, applicants are expected to demonstrate that their proposals are compliant with all relevant legislation regarding the protection of wildlife and habitats and should ensure that they receive the necessary professional advice to be able to do so. This legislation applies equally to projects that do not require planning consent (see section 3.5).

2.1.2. The principal legislation relating to biodiversity conservation in the UK, as it interacts with the planning system, is summarised below.

Conservation of Habitats and Species Regulations 2017 (as amended)

2.1.3. These regulations, often referred to as the Habitats Regulations, were the mechanism through which the European Commission Habitats and Wild Birds Directives were incorporated into UK law. The Habitats Regulations have been amended to reflect the consequences of Brexit, but their substance has been retained to provide protection for sites, habitats and species considered to be of international importance, including the designation of Habitats Sites (see section 4.2).

2.1.4. Local Planning Authorities have the duty, by virtue of being defined as ‘competent authorities’ under the Habitats Regulations, to ensure that planning application decisions comply with the Habitats Regulations. If the requirements of the Habitats Regulations are not met and impacts on Habitats Sites are not mitigated, then development must not be permitted.

2.1.5. Where a Habitats Site could be affected by a plan, such as a Local Plan, or any project, such as a new development, then Habitats Regulations Assessment screening must be undertaken. If this cannot rule out any possible likely significant effect on a Habitats site, either alone or in combination with other plans and projects, prior to the consideration of mitigation measures, then an Appropriate Assessment must then be undertaken. The Appropriate Assessment

identifies the interest features of the site (such as birds, plants or coastal habitats), how these could be harmed, assesses whether the proposed plan or project could have an adverse effect on the integrity of the Habitats Site (either alone or in combination), and finally how this could be mitigated to meet the Stage 2 Habitats Regulations Assessment “integrity” test.

2.1.6. The aim of the Habitats Regulations Assessment process is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (The European Commission Habitats Directive, 92/43/EEC, Article 2(2)). The Habitats Regulations 2017 have transposed the European Union Habitats and Wild Birds Directives into UK law to make them operable from 1 January 2021. These remain unchanged until amended by Parliament so the requirements for Habitats Regulations Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) have been retained.

Town and Country Planning (Tree Preservation) (England) Regulations 2012

2.1.7. These regulations set out the procedures for making Tree Preservation Orders and the activities that are prohibited in relation to trees protected by these orders. Tree Preservation Orders can be made for trees or groups of trees because of their nature conservation value, as well as for their amenity value.

Natural Environment and Rural Communities Act 2006

2.1.8. Section 40 of the Natural Environment and Rural Communities Act places a duty on public bodies in England to conserve biodiversity. It requires local authorities and government departments to have regard to the purpose of conserving biodiversity in a manner that is consistent with the exercise of their normal functions such as policy and decision making.

2.1.9. Section 41 requires the Secretary of State to publish and maintain lists of species and types of habitats which are regarded by Natural England to be of

“principal importance” for the purposes of conserving biodiversity in England, and these are known as Priority Species and Priority Habitats.

Countryside and Rights of Way Act 2000

2.1.10. Amongst other things, this act strengthens the protection afforded to Sites of Special Scientific Interest, including greater powers for Natural England to be able to secure their appropriate management and a requirement for local authorities to further their conservation and enhancement.

Hedgerow Regulations 1997

2.1.11. Although outside of the development management process, these regulations provide a convenient framework for the identification of hedgerows with importance for wildlife, landscape and heritage. For projects that do not require planning consent, the requirements of the regulations would need to be met to permit the removal of any hedgerow or hedgerow section, except if it forms a curtilage to a property.

Protection of Badgers Act 1992

2.1.12. This Act refers specifically to badgers, and makes it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless a licence is obtained from a statutory authority.

Wildlife and Countryside Act 1981 (as amended)

2.1.13. The Wildlife and Countryside Act is the primary mechanism for the protection of all wildlife in the UK and includes schedules that set out those species with additional levels of protection. It also provides the basis for the identification of sites of national importance for nature conservation, Sites of Special Scientific Interest.

2.2. ~~Emerging~~ UK Environment ~~Bill~~Act 2021

2.2.1. ~~Government published the draft~~ The Environment ~~(Principles and Governance)~~ Bill ~~in December 2018, with an updated statement~~received Royal Assent on ~~policy in July 2019. The Bill reached the report stage on 26 January~~9th November 2021, ~~but then the passage of the Bill was postponed until the next parliamentary session,~~ meaning ~~that the earliest~~ it ~~will be enacted~~ is ~~autumn 2021.~~

~~2.2.2. Full details of the requirements of the~~now an Act of Parliament. The Environment Act (insert link) provides legislation ~~will not be available until nearer that time, when the wording of the Bill and any associated regulations is finalised, but what is known in relation to biodiversity and planning is summarised here. It should be noted that this is only a small part of a wideranging Bill with broad coverage of environmental matters.~~ to protect and enhance the environment to deliver the Governments 25-year environment plan (insert link)

2.2.2. Part 6 of the Act relates to nature and biodiversity, including habitat and species protection and enhancement within the planning process.

2.2.3. ~~Based on current indications, the Bill is likely to mandate the delivery of~~ The Act has mandated a minimum ~~percentage~~measurable Biodiversity Net Gain for ~~biodiversity~~all developments covered by ~~way of a general condition on grants of planning permission~~the Town & Country Planning Act (TCPA) and requiring that the biodiversity value of the development exceeds the pre- development biodiversity value of the site by a minimum ~~value, which is currently set at~~of 10%. Biodiversity value ~~will be~~is measured using a metric produced by DEFRA and the baseline value ~~will be~~is calculated from the condition of the site before any intervention has occurred. ~~The development's biodiversity value will include the post development biodiversity value of the site, together with the value of any off-site biodiversity measures and the value of any biodiversity credits purchased.~~

2.2.4. BNG habitats can be delivered on-site, off-site or via statutory biodiversity credits, subject to BNG best practice guidelines, appropriate local delivery mechanisms and BNG providers being established. Habitats must be secured and

managed for a minimum of 30 years via planning obligations or the through Conservation Covenants, as described within part 7 of the Act.

2.2.5. The Act specifies a two-year transition period before mandatory net gain ~~for biodiversity will not~~become law. The timeline for secondary legislation and guidance for mandatory 10% Biodiversity Net Gain are still unknown, but it is likely to apply to ~~permissions granted under Development Consent Orders, such as those made for Nationally~~all TCPA developments and National Significant Infrastructure projects~~, and the Secretary of State can apply other exceptions by regulations. Once the Environment Bill is enacted, there will be a transition period of two years before this~~ (NSIPs), by late 2023. The Councils' interim expectations in relation to biodiversity net gain for biodiversity and our approach to assessment within the planning process, pending further clarification from Government, is set out under Biodiversity Issue B7 (insert page number)

2.2.6. Net gain requirement ~~becomes mandatory.~~

~~2.2.5. Net gain requirements will~~do not undermine the existing mitigation hierarchy, or range of ~~protections~~protection in planning policy and legislation for irreplaceable habitats~~ and protected~~, designated sites and protected species.

2.2.~~6. There will be~~7. The Act introduces a statutory requirement ~~introduced~~ for Local Nature Recovery Strategies to be produced by a responsible authority appointed by the Government. The responsible authority ~~will be a relevant local public body and~~ is likely to be ~~a~~the either the Local Nature Partnership or ~~a County Council. These strategies will map important habitats and areas where there is an opportunity to improve the local environment as a means to guide biodiversity net gain and other policies.~~

~~2.2.7. The Natural Environment and Rural Communities Act will be amended so that biodiversity duty for public bodies in the exercise of their functions, set out in Section 40, will be strengthened to include enhancement in addition to conservation. The amendment will require public authorities to actively carry out strategic assessments of the actions they can take to enhance and conserve biodiversity. Designated public~~

~~authorities will also be required to produce a five-yearly report on the actions taken to comply with the new duty.~~

~~2.2.8. The Councils' interim expectations in relation to net gain for biodiversity and our approach to assessment within the planning process, pending the clarification of legislative and regulatory requirements, is set out under Biodiversity Issue B7.~~

Cambridgeshire County Council. These strategies will map important habitats areas where there is an opportunity to improve the local environment to guide biodiversity net gain and other policies.

3. Planning Policy

3.1. Planning context

3.1.1. As local planning authorities, South Cambridgeshire District Council and Cambridge City Council have a statutory duty to carry out certain planning functions for their administrative areas. These functions include the preparation of a Local Plan and the determination of planning applications. The way these functions are to be carried out is governed by legislation and specified within the National Planning Policy Framework, with reference to further guidance, standards and best practice focused on different considerations that influence planning decisions.

3.1.2. The following sections summarise current planning policy, as relevant to the subject of conserving and enhancing biodiversity. It should be noted that the subject of biodiversity overlaps significantly with other policy and strategy areas, including landscape, arboriculture, green infrastructure, health and wellbeing, sustainability, and climate change.

3.2. National Policy and Guidance relating to the NPPF with Following

3.2.1~~.~~ The National Planning Policy Framework promotes sustainable, well-designed development. Within this aim, it seeks to conserve and enhance the natural environment and ensure that biodiversity and appropriate landscaping are fully integrated into new developments in order to create accessible green spaces for wildlife and people, to contribute to a high quality natural and built environment, and to contribute to a better quality of life.

3.2.2. Section 15 of the National Planning Policy Framework covers the role of the planning system in conserving and enhancing the natural environment. Paragraph ~~170 states that~~174. Planning policies should contribute to and enhance the natural and local environment by, amongst other things:

- a. protecting and enhancing valued landscapes, sites of biodiversity or geological value~~;~~ and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

- d. minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

3.2.3. Paragraph 171 states that development plans should. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans

f. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

3.2.3. Paragraph 175. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries

3.2.4. Paragraph 174 states that179. To protect and enhance biodiversity and geodiversity, plans should:

- a. identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping-stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

3.2.5. Paragraph 175 restates the principle that in making planning decisions, a hierarchical approach 180. When determining planning applications, local planning authorities should be followed, so that apply the following principles:

a. if significant harm ~~should~~to biodiversity resulting from a development cannot be avoided~~, but if it can't be avoided must be~~ (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

~~3.2.6. Paragraph 175 also introduces the idea~~b. development on land within or outside a Site of ~~irreplaceable habitats,~~Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSI

c. development resulting in the loss ~~and~~or deterioration of ~~which~~irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused ~~apart from in~~ , unless there are wholly exceptional ~~circumstances~~reasons and ~~where~~ a suitable compensation strategy ~~has been produced. Within the National Planning Policy Framework, the definition~~exists; and

d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate

3.2.6. Paragraph 181. The following should be given ~~for irreplaceable~~the same protection as habitats ~~is: "Habitats which would be technically very difficult (or take a very~~ sites:

a) potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites

Paragraph 182. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant ~~time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species~~

~~diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen."~~effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site

~~3.2.7. Additional national guidance on biodiversity and planning matters is provided on the Government's Planning Practice Guidance webpages, under the Natural Environment section. This includes links to Natural England's standing advice on protected sites and species, which provides information to Local Planning Authorities on how to assess ecological issues in the determination of planning applications. Other sections provide developers with advice on how to prepare a planning proposal in such a way as to avoid impacts to protected species.~~

~~3.2.8. Government Circular 06/2005 Biodiversity and geological conservation – statutory obligations and their impact within the planning system provides further guidance on the application of the law relating to planning and nature conservation. This clarifies the need for information submitted in support of planning applications to be sufficient to provide local planning authorities with certainty of likely impacts and certainty that mitigation can be secured, giving weight to the conservation of biodiversity within the development control process to avoid decisions being challenged.~~

~~3.3.~~ 3.3. Existing local policies

3.3.1. The policies from the South Cambridgeshire Local Plan and the Cambridge Local Plan that include an aim to conserve and enhance biodiversity, and that this Supplementary Planning Document supports and expands upon, are set out below. Full wording of these policies is included in Appendix 1.

South Cambridgeshire Local Plan

- NH/2 Protecting and Enhancing Landscape Character
- NH/3: Protecting Agricultural Land

- NH/4 Biodiversity
- NH/5 Sites of Biodiversity or Geological Importance
- NH/6 Green Infrastructure
- NH/7 Ancient Woodlands and Veteran Trees
- CC/8 Sustainable Drainage Systems
- HQ/1 Design Principles

Cambridge Local Plan

- 7 The River Cam
- 8 Setting of the city
- 31 Integrated water management
- 52 Protecting garden land and the subdivision of existing dwelling plots
- 57 Designing New Buildings (criteria h.)
- 58 Altering and extending existing buildings
- 59 Designing landscape and the public realm
- 66 Paving over front gardens
- 69 Protection of sites of biodiversity and geodiversity importance
- 70 Protection of Priority Species and Habitats
- 71 Trees

3.4. Area Action Plans and Neighbourhood Plans

3.4.1. Area Action Plans are documents that are adopted as part of the Local Plan and that set out policies and guidance for specific areas within the Council's administrative area. Neighbourhood Plans provide a similar function but are prepared by local communities. Both kinds of documents usually include policies that refer to biodiversity features, adding to the planning policy context for development management.

3.4.2. Neighbourhood Plans are an opportunity for communities to improve their local environment, including protecting and enhancing existing assets, such as local parks, nature reserves and other green spaces. Making biodiversity an integral part

of neighbourhood planning can also help to manage environmental risk and improve resilience to climate change. For example, identifying a local biodiversity network and integrating with land use policies could help to manage the risk of flooding by protecting natural blue and green spaces from development as well as designate these as Local Green Spaces where they provide public benefits.

3.4.3. Information about existing Area Action Plans, the areas designated for Neighbourhood Plans and the status of the plans can be found on the South Cambridgeshire District Council website and the Cambridge City Council website.

3.5. Other relevant adopted Supplementary Planning Documents

3.5.1. Other Supplementary Planning Documents have been produced individually or collaboratively by the councils, and these should be read alongside this one to ensure cross compliance and integration. The following documents are of direct relevance to Biodiversity, but this does not represent a complete list of Supplementary Planning Documents.

3.5.2. South Cambridgeshire District Council has adopted the following Supplementary Planning Documents

- Biodiversity SPD (adopted July 2009),
- Landscape in New Development

(adopted March 2010)

- Trees and Development Sites

(adopted January 2009)

- Open Space in New Development

(adopted January 2009)

- District Design Guide SPD (adopted March 2010) particularly Chapters 2 & 3
- Bourn Airfield New Village

(adopted October 2019),

- Waterbeach New Town

(adopted February 2019),

- Cottenham Village Design Statement

(adopted November 2007)

- Fen Drayton Former Land Settlement Association Estate (adopted May 2011)

3.5.3. Both Councils adopted the Cambridgeshire Flood and Water Supplementary Planning Document in 2018, which includes a strong focus on design and management of Sustainable Drainage Systems to enhance biodiversity value.

3.5.4. Both Councils adopted a Sustainable Design and Construction Supplementary Planning Document in January 2020 and are currently developing a new local landscape character area study Supplementary Planning Document.

3.6. Local biodiversity strategies

3.6.1. The following paragraphs summarise the range of strategies and projects of relevance to Greater Cambridge that are aimed at enhancing biodiversity or that provide technical support to focus measures that will achieve this. All of these have been endorsed or adopted by the Councils and should be used to guide decisions on habitat creation and species protection included within planning proposals. Reference to these initiatives would demonstrate the strategic basis of applicants' decision making around biodiversity matters.

3.6.2. Natural Cambridgeshire is the Local Nature Partnership covering the whole of Cambridgeshire and Peterborough, providing strategic leadership for the recovery of nature under their Doubling Nature vision. This vision seeks to achieve an increase in the amount of land managed for nature from 8% to 16%, by 2050. One of the main areas of focus to achieve this vision is securing high quality green and blue infrastructure within new residential and commercial developments.

3.6.3. Natural Cambridgeshire has developed a Development with Nature Toolkit to provide developers with a means of demonstrating their commitment to achieving a net gain in biodiversity on major developments. The optional toolkit provides standard guidance that, if followed from the earliest stages of development planning,

will determine whether nature is enhanced by the scheme or not. This best practice document is endorsed by both councils.

3.6.4. The Cambridgeshire and Peterborough Future Parks Accelerator Project follows a collaborative approach, seeking to safeguard the future of Cambridgeshire and Peterborough parks and green spaces by finding new ways to deliver, manage and fund parks and open space, with a shared vision across a wide range of partners and stakeholders. This work may identify future design principles and models for ongoing management of new natural green space provision that will require consideration during the planning process.

3.6.5. Cambridgeshire and Peterborough Environmental Records Centre, hosted by the Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire, and Cambridgeshire Biodiversity Group, have prepared habitat opportunity maps covering grassland, woodland and wetland, identifying locations where habitat creation would have the most ecological benefit by connecting existing habitats where environmental conditions are most appropriate.

3.6.6. South Cambridgeshire District Council and Cambridge City Council combined to produce a Greater Cambridge Green Infrastructure Opportunity Mapping report, which provides an evidence base of green infrastructure assets and networks across Greater Cambridge and identifies specific and deliverable opportunities to enhance and expand the network. This document has been prepared as part of the evidence base for the forthcoming Greater Cambridge Local Plan.

3.6.7. Cambridge City Council produced a Nature Conservation Strategy that was adopted as part of the Local Plan in September 2006. The strategy is currently being reviewed but will continue to act as a guiding document for Cambridge City Council's general approach to biodiversity conservation across its range of functions. The Strategy will act in parallel to the new Supplementary Planning Document. It details the biodiversity resource within Cambridge, sets out strategic aims and principles to be implemented in order to further nature conservation, and includes action plans to address a wide range of identified key issues. Cambridge City Council passed a motion in May 2019 to declare a

biodiversity emergency and their biodiversity webpage provides links to initiatives and projects implemented as part of their Nature Conservation Strategy.

3.6.8. Cambridge Past, Present and Future is a charity focused on protecting and enhancing Cambridge's green landscape. In partnership with Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, it has prepared a Cambridge Nature Network, covering an area within a ten-kilometre radius of Cambridge. It identifies five priority landscape areas and highlights the best opportunities for the creation of new habitats and large-scale natural greenspaces. It also sets out the mechanisms by which the Nature Network can be grown, which includes the development process.

3.6.9. The Greater Cambridge Chalk Streams Project seeks to protect and improve the chalk streams in and around Cambridge. The report (published in Dec 2020) provides an overview of the main problems affecting each chalk stream and the key opportunities to improve each one. It also identifies some potential projects for delivery in partnership with stakeholders and landowners.

3.6.10 The Wicken Fen Vision is a 100 year plan to restore the Fenland landscape and habitats around Wicken Fen to an area of 53 square kilometres, linking to the Cambridge Nature Network.

3.6.10. The importance of the landscape is reflected in national planning guidance with the National Planning Policy Framework stating that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. The South Cambridgeshire landscape has several distinctive and readily identified characters. These have been identified by Natural England as five distinct National Character Areas:

- The Fens
- South Suffolk and North Essex Claylands
- East Anglian Chalk
- Bedfordshire and Cambridgeshire Claylands
- Bedfordshire Greensand Ridge.

Figure 1 National Character Areas within Greater Cambridge

3.7. Permitted development

3.7.1. Permitted development rights derived from The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) mean that certain types of development can be performed without the need to apply for planning permission. However, although this would be outside the normal planning process, there remains a need for the councils to consider the effects that any development relying on permitted development rights might have on biodiversity. Legal protection for wildlife still applies and so any legally protected animals, plants or habitats that may be affected will need proper consideration for the development to be lawful.

3.7.2. Certain types of development are granted planning permission by national legislation without the need to submit a planning application. This is known as 'Permitted development'. To be eligible for these permitted development rights, each 'class' specified in the legislation has associated limitations and conditions that proposals must comply with.

3.7.3. One such condition on certain classes of permitted development is the need to submit an application to the Local Planning Authority for its 'Prior approval' or to determine if its 'Prior approval' will be required. This allows the Local Planning Authority to consider the proposals, their likely impacts regarding certain factors (such as transport and highways) and how these may be mitigated. Where natural habitats and wildlife are likely to be present, adequate information must be provided to the councils to support the assessment of the ecological implications of the development, the need for mitigation, and if necessary, the need for a licence from Natural England.

3.7.4. Work must not commence on the development until the Local Planning Authority has issued its determination or it has received 'deemed consent' when the time period for a determination to be issued expires. By default, this is an eight week period from when the application is received, but this can vary depending on the type of proposal and may be extended if all parties are in agreement.

3.7.5. Article 4 directions are made when the character of an area of acknowledged importance would be threatened, most commonly in Conservation Areas. Where properties are affected by such a direction, some of the permitted development rights can be removed by the councils issuing an Article 4 direction, which then means planning consent will be needed for work that normally does not need it.

3.7.6. Class Q applications are applications for Prior Approval for a change of use or conversion of a building, and any land within its curtilage, from a use as an agricultural building to that of a dwelling. Where the buildings are likely to support bats or other legally protected species, there is a risk that they may be affected by the proposals, and it is therefore essential that the Local Planning Authority has certainty of impacts prior to determination of any application. Sufficient information, including appropriate survey results, will be needed to support such an application.

3.7.7. Permission in Principle applications do not include a consent as this is a separate step in the planning process. The scope of permission in principle is limited to location, land use and amount of development. Issues relevant to these 'in principle' matters should be considered at the permission in principle stage. Other matters should be considered at the technical details consent stage. In addition, local authorities cannot list the information they require for applications for permission in principle in the same way they can for applications for planning permission.

3.7.8. Change of use applications can bring benefits if properly planned and sensitively managed. The use of grassland sites by horses for equestrian purposes can sustain their botanical interest. However, there is also much potential to damage the interest of grassland sites through overgrazing. Over-grazing may lead to the proliferation of certain undesirable species, increased soil erosion, and diffuse pollution. Development proposals for stabling or for Change of Use to paddock land will be subject to ecological assessment based on the likelihood of protected and Priority species being present and affected, as well as impacts on the local landscape character.

4 The biodiversity resource

4.1. Introduction

4.1.1. Biodiversity exists everywhere and includes the ubiquitous species as well as rarities, but the designation of species and sites has been used as a means of identifying relative value and for the prioritisation of nature conservation action. This chapter provides a summary of the sites designated for their nature conservation value across the Greater Cambridge area, and of the legally protected and Priority species present.

4.1.2. All such sites and species are material to planning decisions, and the sites provide the core of the local ecological network as well as being integral to developing Nature Recovery Networks. Detailed information about designated sites and existing records of protected and Priority species can be obtained through a data search from Cambridgeshire and Peterborough Environmental Records Centre.

4.2. Statutory designated sites

Habitats (European) sites

4.2.1. Special Protection Areas and Special Areas of Conservation are sites of international importance protected by the Conservation of Habitats and Species Regulations 2017 (as amended) as a requirement of the UK's commitment to international commitments. These were formerly known as European or Natura 2000 sites. Ramsar sites are wetlands of international importance that have been designated under the criteria of the international Ramsar Convention on Wetlands. Collectively, these sites are now known as Habitats Sites as defined by National Planning Policy Framework.

4.2.2. The potential impact of planning proposals on Habitats Sites inside

and outside of the Greater Cambridge area will need to be covered within supporting ecological information, as guided by defined Zones of Influence agreed with Natural England. These are likely to be based on a particular impact type and are shown as Impact Risk Zones on Multi-Agency Geographic Information for the Countryside around the underpinning Sites of Special Scientific Interest.

4.2.3. There is one Habitats Site - Eversden and Wimpole Woods Special Area of Conservation - located within the Greater Cambridge area, and a further four within 20km of the Councils' administrative boundaries. The distribution of these sites is illustrated in Figure 2, but Multi- Agency Geographic Information for the Countryside should be consulted for boundaries and site information:

- Ouse Washes Special Area of Conservation, Special Protection Area and Ramsar - abutting the Local Plan area to the north at Earith; designated for its internationally important breeding and over- wintering assemblages of birds, for its population of Spined Loach and for the presence of other nationally rare plants and animals
- Portholme Special Area of Conservation - 4 km to the northwest; designated for its lowland hay meadow habitat
- Devils Dyke Special Area of Conservation - 5.8 km to the northeast; designated as an important orchid site on semi-natural dry grassland habitat
- Fenland Special Areas of Conservation, which also covers the land designated as Wicken Fen Ramsar and Chippenham Fen Ramsar – approximately 1 km to the northeast; designated for its fen meadow and calcareous fen habitats.

Figure 2 Internationally designated sites

4.2.4. The Eversden and Wimpole Woods Special Area of Conservation comprises a mixture of ancient coppice woodland (Eversden Wood) and high forest woods likely to be of more recent origin (Wimpole Woods). Wimpole Woods holds the summer maternity roost of a population of Barbastelle bats (Barbastella barbastellus). The bats also use suitable habitat within the Special Area of Conservation to forage and it provides commuting routes followed when they forage outside of the site's boundary, where they utilise wet meadows, woodland streams and rivers.

4.2.5. Surveys to support development proposals have identified summer roosts of male Barbastelle bats in old and unmanaged woodland outside of the Special Area of Conservation, using loose bark on dead trees and crevice features caused by damage. Barbastelle bats can range 20 km per night, further for non-reproductive females, and they frequently switch tree roosts throughout the year within their territory. Barbastelle bats will remain in tree roosts over winter unless temperatures dip below freezing, when hibernation roosts have been found in features such as caves, old buildings and basements.

Sites of Special Scientific Interest

4.2.6. Sites of Special Scientific Interest are designated in accordance with the duties in law placed upon each of the country nature conservation bodies to notify as a Sites of Special Scientific Interest any area of land which, in its opinion, is of special interest by reason of any of its flora, fauna, geological, geomorphological or physiographical features.

4.2.7. There are 41 Sites of Special Scientific Interest within the Greater Cambridge area, covering a range of habitats and geological formations, including chalk grassland, species-rich neutral grassland, reedbed and fen, Ancient Woodland, chalk pits, gravel pits and clay pits. Further information can be obtained through the Multi-Agency Geographic Information for the Countryside including boundaries and links to site descriptions.

Local Nature Reserves (LNRs)

4.2.8. Local Nature Reserves are statutorily protected sites of land designated by Local Authorities because of their special natural interest, educational value and access to nature. There are 13 statutory Local Nature Reserves within the Greater Cambridge as illustrated on Multi-Agency Geographic Information for the Countryside. More information on individual Local Nature Reserves is available on the Cambridge City Council and Cambridgeshire County Council websites.

Figure 3 Nationally designated sites

Figure 4 Locally designated sites

4.2.9. Local Sites, as defined by National Planning Policy Framework, have been identified for all Councils in Cambridgeshire and are referred to as County Wildlife Sites. These are designated for their importance for nature conservation at a county level
and are identified on the Councils' Local Plan Policies Maps. County Wildlife Sites are non-statutory sites identified against a set of locally developed criteria, produced by Cambridgeshire & Peterborough County Wildlife Site Panel and covering both habitat and species.

4.2.10. The National Planning Policy Framework requires these sites to be protected through the Local Plan system as part of a Local Ecological Network. As well as supporting the majority of Priority Habitat within a given area, County Wildlife Sites often present opportunities for biodiversity enhancement, by improving existing management.

4.2.11. Within Cambridge City, a second layer of non-statutory sites have been identified and are referred to as City Wildlife Sites, recognizing the importance of natural green space and habitats within the urban context. These sites are identified under a separate set of criteria with a lower threshold than for County Wildlife Sites.

4.2.12. Cambridgeshire's Protected Roadside Verges represent the best examples of road verge grassland across the county, identified for special management by Cambridgeshire County Council against a defined set of criteria based upon the presence of rare species or those indicating quality grassland habitat. Road verges constitute the largest area of unimproved grassland within the Greater Cambridge area and will be protected from development impacts. Many Protected Roadside Verges are also designated as County Wildlife Sites.

4.3. Protected species

4.3.1. The presence of any legally protected species is a material consideration in the determination of a planning application. Populations of most species are dynamic and so existing records can only be used as a guide to likely presence and should be tested by appropriate field survey work.

4.3.2. European Protected Species with known populations within the Greater Cambridge area are Great Crested Newts,12 species of bats (including the population of Barbastelle bats at Eversden and Wimpole Woods Special Area of Conservation) and Otter, with a very few records of Dormouse.

4.3.3. A range of other UK species are protected by various pieces of legislation, primarily the Wildlife and Countryside Act 1981 (as amended). Those protected by their inclusion in the Schedules of the Act and known to be present in the Greater Cambridge area include White-clawed Crayfish, Water Vole, Badger, Common Lizard, Grass Snake and Barn Owl. The area also supports populations of Fairy Shrimp, including at the Whittlesford Thriplow Hummocky Fields Site of Special Scientific Interest.

4.3.4 For advice on proposals that will require a protected species mitigation licence developers can use Natural England's Pre-submission screening service

4.4. Priority Habitats

4.4.1. Priority Habitats are those included within the list prepared under Section 41 of the Natural Environment and Rural Communities Act. The distribution of Priority Habitats in South Cambridgeshire district and Cambridge City can be identified on the Cambridgeshire Habitat Opportunity Map. Priority Habitats are largely represented by small, fragmented blocks, but there are clusters reflecting the varied environmental character of the area.

4.4.2. Lowland Calcareous Grassland is predominantly found to the south east of the Cambridge, within the Gog Magog Hills. To the east and north east is the fenland, with concentrations of Lowland Fen, Reedbeds and Lowland Meadows. The

corridor of the River Cam and its tributaries supports Floodplain Grassland Mosaic, Wet Woodland and Lowland Meadows, as well as the River habitat itself and Chalk Stream sections. To the west of Cambridge are Lowland Mixed Deciduous Woodland, Hedgerows, Lowland Meadows and Traditional Orchards on the boulder clay. To the north of Cambridge, the presence of Traditional Orchards on the fen edge reflect the significance of former land uses.

4.4.3. Natural England maintains inventories of Priority Habitats, which can be viewed on the Multi-Agency Geographic Information for the Countryside map. These inventories should only be viewed as provisional, with the presence or absence of Priority Habitats to be confirmed by field survey results, with reference to the published UK Priority habitat descriptions.

4.5. Priority Species

4.5.1. Priority Species are those included within the list prepared under Section 41 of the Natural Environment and Rural Communities Act. Over 200 UK Priority Species are found in Cambridgeshire as a whole, which includes recognisable but declining species such as Common Toad, Brown Hare, House Sparrow and Hedgehog alongside a range of lesser known invertebrates, and plants such as Purple Milk-vetch.

4.5.2. Given the largely agricultural character of the area, there is also good representation of farmland bird species such as Skylark, Turtle Dove, Tree Sparrow, Grey Partridge and Yellowhammer, whose populations could be affected by any development on arable land. The loss of breeding territories of such farmland birds is likely to require compensation by provision on nearby farmland. Over- wintering birds such as Lapwing and Golden Plover are also important farmland species to be considered in ecology surveys.

4.5.3. The Cambridgeshire and Peterborough Biodiversity Group provides a full list of Priority Species known to be present in the county.

4.5.4. Priority invertebrate species may be poorly recorded, but the identification of habitats and features of likely value to invertebrates should serve as a trigger to consider the need for specialist survey. The national invertebrate conservation charity Buglife has created a map of B-Lines as a strategic initiative to target habitat creation and connectivity for pollinators and has also mapped Important Invertebrate Areas, landscapes that are of particular significance for invertebrate populations, where a greater focus on impacts to favourable habitat may be required. The Fens Important Invertebrate Area lies within Greater Cambridge.

4.6 Red List Species

4.6.1. The nature conservation status of species has been determined by the assessment of populations against threat and rarity criteria, often at local, national and international levels. Species with higher rarity and threat ~~statuses~~status are generally known as Red List species. In the UK, information on national reviews and species statuses is available from the Joint Nature Conservation Committee. As there is no centrally coordinated approach to these reviews, the coverage of species groups, the age of the information, and the criteria used vary.

4.6.2. There is no Cambridgeshire Red List, but there is a list of Additional Species of Interest, which provides comparable information and includes the Cambridgeshire Plant Species of Conservation Concern.

Non-native invasive species

4.6.3. Vigorous or invasive non-native plant species can impact negatively upon biodiversity by out-competing native flora. This can then lead to a negative impact upon fauna by limiting the available feeding and cover areas. Species of particular concern include Signal Crayfish (Pacifastacus leniusculus), American Mink (Mustela vison), Japanese Knotweed (Fallopia japonica), Indian Balsam (Impatiens glandulifera), Giant Hogweed (Heracleum mantegazzianum), Floating Pennywort (Hydrocotyle ranunculoides), Parrot’s-feather (Myriophyllum aquaticum), New Zealand Pigmyweed (Crassula helmsii) and Water Fern (Azolla filiculoides).

More information is available on the webpages of the GB Non-native Species Secretariat.

4.6.4. Where proposals at development sites are likely to result in the spread of non-native invasive plant species the development may not be permitted until suitable measures have been agreed and / or undertaken to control the invasive species. It should be noted that it is an offence to spread, or cause to grow, certain plant species listed on Schedule 9 of the Wildlife and Countryside Act, 1981 as amended.

5. Biodiversity in the development management process

5.1. Introduction

5.1.1. As biodiversity is a material consideration for planning, this section covers the need to consider biodiversity at every stage in the planning application process and what form that consideration should take to ensure that progress is not held up. It sets out the types and quality of information that applicants and their ecological advisers are expected to achieve when preparing an application for submission.

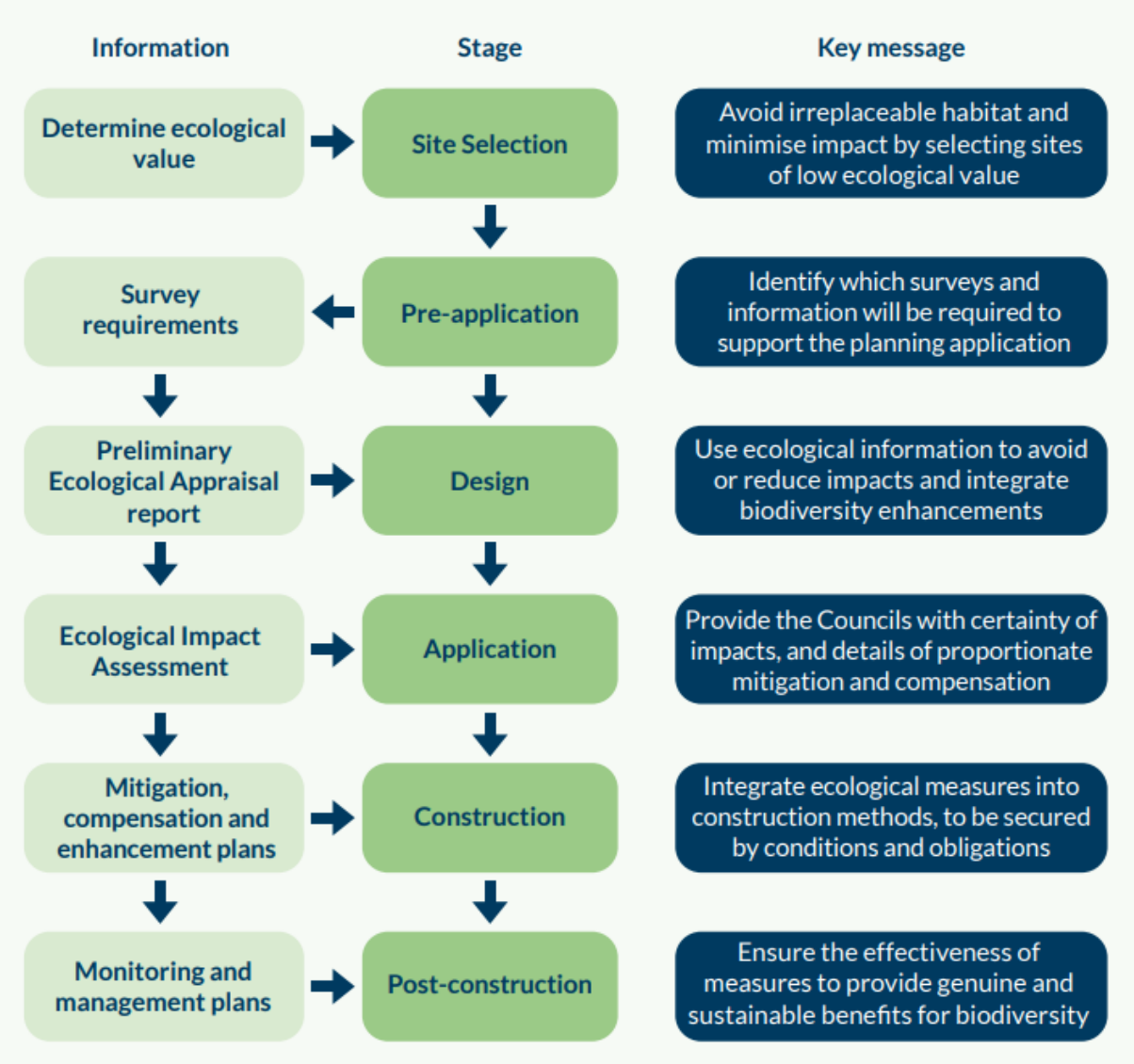

Figure 3 Stages within the development management process

5.2. Overarching principles

Biodiversity Issue B1 – mitigation hierarchy

To meet national and local policy requirements (NH/4 Item 3 and Policy 70), submitted ecological reports are expected to explain how the hierarchy of mitigation measures (Avoid, Mitigate, Compensate) has been embedded into the design of the development. Where impacts on habitats and species cannot be avoided, a clear explanation of why alternative sites are not feasible and what proposed mitigation and compensation measures are necessary to address all likely significant adverse effects is needed.

Figure 4 Mitigation Hierarchy

5.2.1. The mitigation hierarchy aims to prevent net biodiversity loss and strict adherence to its principles is essential. This approach is included in the National Planning Policy Framework and also in ecological best practice guidelines. Definitions vary, but usually include the following steps that must be implemented in order:

- Avoid - Anticipated biodiversity losses should be avoided and reduced by using alternative sites and designs, retaining habitats of value for enhancement and management and retaining species in situ.
- Mitigate - Impacts considered unavoidable should be mitigated where the impact occurs, by replacing lost protected and priority habitats and accommodating displaced species within the site boundary.
- Compensate - If mitigation measures are insufficient then, as a last resort, off-site compensatory measures should also be implemented in proportion to the harm, by creating suitable habitat off-site and relocating species.

5.2.2. As required by the National Planning Policy Framework and as a key principle of delivering Biodiversity Net Gain (see Biodiversity Issue B6), applicants must demonstrate that, in the design of their proposals, they have followed the mitigation hierarchy with respect to ecological impacts.

5.2.3. Ecological consultants can advise on avoiding negative impacts on the biodiversity of a development site by involvement throughout the planning application process, but most importantly at the site selection and design stages. Seeking advice early on in the planning process might help avoid costly delays later on.

5.2.4. Homeowners and developers will often require an ecologist to undertake ecological surveys and mitigation work in relation to a building project to meet the Councils' requirements for ecological information. Contracting a member of a professional institute such as the Chartered Institute for Ecology and Environmental Management means that you are engaging a professional who is working to high standards and there is a complaints procedure if anything goes wrong. Applicants needing to find a consultant to support their planning application can use the tool on the Chartered Institute for Ecology and Environmental Management website which also provides further information on ecological surveys and their purpose, which describes the different types of reports that you may be asked for by the Councils, what to expect from a bat survey and a householder's guide to engaging an ecologist.

5.2.5. The approach to following the hierarchy should be informed by the ecological value of the habitats and species to be affected. Impacts to Priority habitats and species should always be avoided, if possible, but mitigation or compensation for ~~other~~any species ~~and~~or habitats degraded or destroyed through the development process is also ~~desirable.~~ required.

BS42020:2013 Biodiversity – Code of practice for planning and development

5.2.6. This British Standard gives guidance on how development might affect biodiversity, provides recommendations on how to integrate biodiversity into all stages of the planning, design and development process, and provides a rigorous framework for assessing impacts and for securing mitigation, compensation and appropriate biodiversity enhancements. Compliance with the standard in the ecological information submitted by applicants can be seen as an indication of its validity and relevance to the determination process and is encouraged. It is intended

to assist those concerned with ecological issues as they arise through the planning process and in matters relating to consented development that could have site-specific ecological implications.

5.2.7. BS42020 states that high quality ecological information is important for effective decision making as well as for compliance with legal obligations and policy requirements and successful implementation of the practical conservation and biodiversity enhancement measures identified in the ecological reports submitted with planning applications. The standard identifies the ecological data required and considerations for its assessment, and its use in the design of mitigation measures, to give certainty, clarity and confidence to those involved at all stages of the planning process.

5.2.8. Compliance with this standard is an important and credible way to demonstrate the validity of the ecological information you will bring forward in support of your planning application. Any deviations from this British Standard will need to be fully justified and they may be challenged by the Councils or external consultees, leading to delays in the decision process.

5.3. Site selection stage

5.3.1. The easiest way to avoid a negative impact on species and habitats and to maximise the gain for biodiversity that can be achieved from a development is to select a site that has low existing ecological value and low strategic potential for habitat creation, buffering or connectivity. This could include sites that have been intensively managed or where land use has resulted in degraded habitats. In addition, brownfield sites can also contribute to wider strategic potential for habitat creation by providing links between green corridors or linking up wildlife corriddors. It should be noted that ecological value should be measured by a suitably qualified professional and not judged on appearance, as sites that may appear to be degraded could include features of particular significance to certain species.

Biodiversity Issue B2 – Protection of irreplaceable habitats

Developers will be expected to avoid direct and indirect impacts on irreplaceable habitats and embed measures to achieve this within the design of any development proposal.

To meet policy requirements (NH/4 item 6, NH/7 and Policy 71), the councils will refuse applications that would result in the loss, deterioration or fragmentation of irreplaceable habitats unless the need for, and benefits of the development clearly outweigh the loss, and a suitable compensation strategy exists. In these situations, biodiversity net gain is not achievable. As per NPPF 2021, there would have to be wholly exceptional reasons for this to be the case with the burden of proof for these falling to developers to provide irrefutable evidence of these exceptional reasons.

5.3.2. Irreplaceable habitats are defined in the National Planning Policy Framework as "habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity." In addition to Ancient Woodland and veteran trees, other types of habitat such as unimproved grassland, lowland fen and ancient hedgerows are also considered to be irreplaceable. The loss of these habitats cannot be compensated for by gains elsewhere and so they are excluded from Biodiversity Net Gain calculations.

5.3.3. All development predicted to result in impacts on irreplaceable habitat will need to be accompanied by detailed survey information and evidence to support the exceptional reasons that justify such a loss. Compensation strategies should include contribution to the enhancement and management of the habitat. Compensation for damaging development to a site by way of its habitat enhancement and management should not substitute action that would be happening anyway.

5.3.4. Ancient woodland shall be identified by having regard to the presence and combination of Ancient Woodland Indicator Species, as presented in the Cambridgeshire and Peterborough County Wildlife Sites Selection Guidelines. The Woodland Trust's Planning for ancient woodland – planners manual for ancient

woodland and veteran trees should be used as a guide to avoiding and minimising impacts from development proposals.

Pre-application advice

5.4.1. There are many advantages to seeking pre-application advice from the Greater Cambridge Planning Services at an early stage in the preparation of development proposals, particularly for ecology and Biodiversity Net Gain. This frontloads the process and avoids risks of delays and additional costs on submission, by providing the developers and their agents with clarity on the scope of information that will be expected to enable the application to be determined.

5.4.2. Where there is a predictable impact on biodiversity and insufficient ecological information is submitted to support determination, the Councils are likely to refuse an application.

5.4.3. The Greater Cambridge Shared Planning Service offers a pre-application service that can save time and money for anyone considering submitting a planning application, and it also offers design workshops to applicants. This may be particularly valuable to householders and those who are not regularly involved in development, who may not routinely seek professional ecological support or be aware of all of the relevant issues.

5.4.4. Developers wishing to seek substantive advice on recreational pressure impacts and mitigation relating to Sites of Special Scientific Interest should be directed to Natural England's Discretionary Advice Service.

Existing biodiversity information

5.4.1. Biodiversity baseline information from the Cambridgeshire and Peterborough Environmental Records Centre is needed within all ecological reports, to identify the presence of designated sites and existing records of habitats and species that could be affected by development. Data search requests should be for a

minimum 1 km buffer from the red line boundary for protected and Priority species and 2 km for all designated sites. While older data may be less relevant in some cases, it may provide the only baseline available for a site and so should not be discounted.

5.4.2. An absence of records does not mean a record of absence and ecological consultants need to use their professional judgment to ensure that biodiversity features are not overlooked. Survey and assessment of all species likely to be present on and adjacent to the development site and any which could be affected indirectly should be covered.

5.4.3. Provision of this data within submitted ecological reports needs to be presented in accordance with the terms and conditions of Cambridgeshire and Peterborough Environmental Records Centre and any sensitive records should only be shown at 10km resolution.

5.4.4. The consultant ecologist should also determine whether the development site falls within a Site of Special Scientific Interest Impact Risk Zone, as shown on the Multi-Agency Geographic Information for the Countryside map, which would indicate that the development could result in indirect impacts that require consultation with Natural England.

Biodiversity Issue B3 – Great Crested Newt district level licensing

To meet policy requirements (NH/4 and Policy 70) and support development which is likely to impact on Great Crested Newt, if a developer is accepted to join the Natural England Cambridgeshire Great Crested Newt District Level Licensing scheme, they do not need to carry out their own surveys for this European Protected Species or plan and carry out mitigation work.

If a consent for development is issued, developers do not need to meet the Government's Standing Advice for Great Crested Newt. However, the Councils will still require survey and assessment for other protected and Priority species likely to

be present and affected by development, together with delivery of any mitigation needing to be secured by a condition of any consent.

5.4.1. Natural England has now launched a District Level Licensing scheme for Great Crested Newt in Cambridgeshire that developers can pay to join for each of their sites, to better protect Great Crested Newt populations as an alternative to conventional site- based survey, licensing and mitigation methods. Full details are available on the relevant pages of the Government District Level Licensing website.

5.4.2. As an alternative to Great Crested Newt surveys and assessment, the use of District Level Licensing provides a year-round option for developers to mitigate predicted impacts on Great Crested Newt and can provide certainty of costs and timescales.

5.4.3. With an agreement in place with Natural England to use District Level Licensing, the Councils only need an Impact Assessment and Conservation Payment Certificate countersigned by Natural England to be submitted with the planning application as evidence of site registration under this strategic mitigation scheme.

5.4.4. Participation in the District Level Licensing scheme does not negate the need for proposals to follow the mitigation hierarchy or deliver measurable net gain. The Councils will still require survey and assessment for other protected and Priority habitats and species likely to be present and affected by development, with any necessary mitigation secured by a condition of any consent.

5.4.5. A precautionary approach to site clearance, under the supervision of a suitably qualified ecologist, will be required for all development supported by Great Crested Newt District Level Licensing, ~~as all~~or where protected and Priority species predicted to be on site ~~will need to be moved to a place of safety~~ To avoid reckless actions and ~~prevent~~ wildlife crime~~.~~, this will include supervision of any habitat works by an Ecological Clerk of Works, who will undertake a fingertip search, and implementation of a Construction Environment Management Plan (Biodiversity).

5.4.6. The ~~emerging Natural~~ Environment ~~Bill~~Act 2021 has indicated an intention to prepare other Strategic Mitigation Schemes in consultation with stakeholders to support delivery of sustainable development.

Ecological surveys and assessment

5.4.7. Applicants must ensure that planning applications are supported by adequate ecological information, using up to date desk studies and site assessment to inform survey methodologies sufficient in scope to allow the impact of a proposal to be appropriately assessed. This includes householders and developers of small sites, where they may be unexpected risks of impacts to habitats and species. CIEEM provide an advice note on the lifespan of ecological surveys here; https://cieem.net/wp-content/ uploads/2019/04/Advice-Note.pdf See Appendix 2.

5.4.8. A Preliminary Ecological ~~Assessment~~Appraisal is often carried out by ecologists as an initial means of recording the habitats and condition of a development site and predicting the likely ecological constraints and impacts that might arise from its development.

5.4.9. Preliminary Ecological ~~Assessment~~Appraisal Reports are valuable documents that should be commissioned at the earliest stages of design, and their results should influence the layout and form of the proposals. Identifying important ecological resources at the outset and avoiding impacts on them will limit the loss of biodiversity and reduce the need for mitigation and compensation measures. In many cases these reports will include recommendations for further survey, particularly in relation to protected and priority species.

5.4.10. All surveys must be carried out in accordance with published standards and best practice guidance, as appropriate to the information they are expected to generate. To ensure the acceptability of impact assessment, any deviations from best practice should be explained and justified.

5.4.11. Pre-development biodiversity value must be calculated before any site clearance or other habitat management work has been undertaken, by the applicants

or anybody else. However, if this is known to have happened, ~~the condition of the site~~ on or after 30th January 2020 the condition of the site will be taken as the habitat baseline stated in Schedule 14 Part 1 paragraph 6 of the ~~emerging~~the Environment ~~Bill~~Act 2021. This is consistent with existing good practice guidelines for ecological assessment, including
CIEEM and BREEAM guidelines. Where previous surveys are not available, this will be established through Cambridgeshire and Peterborough Environmental Records Centre records and habitat areas identified through aerial photographs. Where habitat conditions are not known, then a precautionary approach will be applied.

5.4.12. Habitat mapping methodologies need to be appropriate to their purpose, which for biodiversity net gain calculations means UK Habitats Classification, as required for the Defra Biodiversity Metric calculation. Phase 1 habitat mapping can still be used for PEA reports, or in circumstances where Biodiversity Net Gain calculation is not required.

5.4.13. Where the applicant's commissioned ecology report indicates that further surveys are required to support a planning application, the results of all such surveys and associated details of necessary mitigation measures will need to be submitted prior to determination. This is necessary to provide the Councils with certainty of likely impacts and that effective and deliverable mitigation can be secured either by a condition of any consent or a mitigation licence from Natural England. Where recommended protected species surveys have not been completed, the ecology report will not be sufficient to support a planning application.

5.4.14. The Council expects that all biodiversity records obtained during surveys to inform development will be submitted to Cambridgeshire and Peterborough Environmental Records Centre, as required by the Chartered Institute for Ecology and Environmental Management's code of professional conduct. Applicants must not seek to restrict their ecological consultants from submitting biodiversity records.

5.5. Design stage

Biodiversity Issue B4 – Conservation and enhancement of biodiversity

To meet national and local policy requirements (NH/4, NH/5, NH/6, Policy 69 and Policy 70), development should:

1. Secure the conservation management and enhancement of natural and semi-natural habitats in the landscape together with the biodiversity that they contain and seek to restore and/or create new wildlife habitats.
2. Secure the provision of appropriate public access to natural green spaces, particularly within or close to the villages.

Habitats will be considered important for biodiversity where they:

1. Are part of the UK national network of sites (Habitats sites) or are proposed for designation
2. Are nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Local Nature Reserves) or are proposed for designation
3. Are non-statutory designated sites of at least County or City importance or are proposed for designation
4. Are likely to support the presence of a Priority species or habitat, or significant populations of a national or local Red list species
5. Have the potential to assist in the delivery of National, County or District Nature Recovery Networks and clearly act as a stepping-stone, wildlife corridor or refuge area ~~within an otherwise built environment~~
6. Provide for the quiet enjoyment of biodiversity within semi-natural areas ~~of an otherwise built environment~~ or act as an educational resource, such as Local Nature Reserves

5.5.1. Proposals that contain or that will affect a habitat of importance for biodiversity will be expected to include measures to protect any existing value and~~, where possible,~~ to improve their condition by appropriate enhancement or management measures. Retaining existing biodiversity features on sites might make it easier to achieve BNG. Management should be sustainable for the long-term, with clear

objectives guided by the site's existing habitat features and species, as appropriate to location and environmental conditions.

5.5.2. While it can be possible to combine positive nature conservation management with public access, it should be noted that the potential impact of public access must be fully considered in determining the likely target condition of the biodiversity habitat and its value to any existing species populations. Measures to manage the existing impact of recreation on an area of semi-natural public open space will be welcomed.

Figure 5 An example of a small site

Even small sites can support protected and priority species; although this house and garden appear unremarkable, there are two bat species using the loft, nesting birds in the dense common ivy, and great crested newts in a small pond.

5.5.3. Small sites, including gardens and other urban green space, can also support habitats and species of nature conservation value and provide opportunities for enhancement and improved management.

5.5.4. Where appropriate, the Councils will secure measures to conserve and enhance biodiversity by applying a planning condition requiring the submission and approval of an Ecological Design Strategy or a species-specific Biodiversity Mitigation Strategy, which will include:

a) The purpose and conservation objectives of the proposed works

b) A review of baseline conditions, site potential and constraints

c) Detailed designs and/or working methods to achieve stated objectives

d) The specific extent and location of proposed works shown on maps and plans at an appropriate scale

e) The type and source of materials to be used, where appropriate, such as specifying native species of local provenance or the type of bird box to be used.

f) A timetable for implementation, demonstrating that works are aligned with any proposed phasing of development

g) The persons responsible for implementing the works

h) Details of initial aftercare and long-term maintenance

i) Details for monitoring and remedial measures

j) Details for disposal of any wastes arising from works

Biodiversity Issue B5 – Biodiversity provision in the design of new buildings and open spaces

To meet policy requirements (HQ/1, NH/4, Policy 57 and Policy 59), the councils will expect:

1. That development proposals will have regard to the biodiversity already present within a development site and to identify opportunities to maximise the provision for biodiversity within new buildings in line with strategic nature conservation priorities. ~~2. That on all major housing developments 50% of the dwellings/units will have features such as integrated bird, bat or insect boxes provided in close association with the properties. On all other sites suitable provision for biodiversity enhancements shall be negotiated to achieve a similar standard.~~

~~3. For minor and householder development, each dwelling/unit will have at least one integrated feature appropriate to the location of the development.~~

~~4. That all~~ 2. That on all residential housing developments, there should be an equal number of integrated bird box features as there are dwellings for building-dependent birds (breeding Swifts, House Sparrows, Starlings and House Martins) provided individually or clustered in appropriate locations within the development.

3. That all suitable commercial and community building applications will ~~need to~~ include integrated ~~features~~ bird box features for building dependent birds (breeding Swifts, House Sparrows, Starlings and House Martins) in keeping with the scale of development, i.e. Minimum of 10 boxes for the first ~~1000sqm~~1000 sqm footprint and one additional box for every ~~additional~~ 100 sqm.

~~5. That~~ 4. That on all residential housing developments 25% of the dwellings / units will have integrated bat box features, provision to be clustered next to appropriate foraging habitats.

5. That new wildlife habitats and features, including predominantly native trees and shrubs and durable tree mounted nest boxes, bat boxes and insect boxes, will be incorporated into landscaping schemes and the general layout of the built

environment. All fencing will be expected to be hedgehog friendly and hedgehog highways should be incorporated throughout the development.

Figure 6 Hedgehog Highway gaps in boundary fence

Incorporating Hedgehog Highway gaps into boundary fences ensures connectivity between gardens for Hedgehogs and other wildlife, increasing the extent of habitat available in a secure way.

5.5.5. Design of new developments should ~~seek to~~ retain habitats of value to biodiversity wherever possible. Even for small scale developments, this would include boundary hedgerows, trees and any pond on site and these can provide the framework for the setting of the scheme layout as well as contributing to the post development network for nature and people.

5.5.6. Landscape design will be required to enhance existing habitats and link them to new habitats created within the development site that are suited to the landscape character (see section 3.13.10). Further information can be found on the Building Research Establishment Environmental Assessment Method webpage for a Green Guide Calculator and Building with Nature.

Figure 7 Landscaping and soils

A bank and low nutrient substrate with sparse vegetation, incorporated into landscaping to benefit solitary mining bees and other invertebrates.

Figure 8 Integrated nesting habitat for birds or bats

Integrated boxes primarily designed for swifts will also be used by other species such as house sparrow and are easily built into new buildings.

5.5.7. The use of low nutrient status soils to support diverse habitat mosaics with low maintenance requirements is encouraged and applications within the B-Lines identified by Buglife will be expected to include sustainable landscaping features of value to invertebrates, especially pollinators, including flowering lawns.

5.5.8 Natural timber and aggregate waste from site should be retained and repurposed for habitat creation such as hibernacula and low nutrient banks wherever possible.

A bank and low nutrient substrate with sparse vegetation, incorporated into landscaping to benefit solitary mining bees and other invertebrates

Integrated boxes primarily designed for swifts will also be used by other species such as house sparrow and are easily built into new buildings

5.5.8. The impact of garden extensions into the open countryside needs to be considered as, although these provide an opportunity to diversify arable landscapes, species and features associated with a farmland landscape may not be replicable within the garden environment. Applicants, where appropriate, will be required to plant mixed native species hedges with trees to define boundaries in open countryside as opposed to the erection of fences that may hinder the natural movement of animals. In the above image, a bank and low nutrient substrate with sparse vegetation are incorporated into landscaping to benefit solitary mining bees and other invertebrates.

5.5.9. In addition, the provision of integrated boxes (a combination of bird, bat & insect boxes) will be required in new buildings for all types of development and should target protected, Priority and other species associated with the built environment, such as Swift, as promoted by Action for Swifts, house sparrow, starling and pipistrelle bats. Where appropriate, high quality, durable boxes can also be provided on retained trees within the public realm. ~~Integrated boxes primarily designed for swifts will also be used by other species such as house sparrow and are easily built into new buildings~~

5.5.11 Artificial lighting has the potential to negatively impact on nocturnal species and should be minimised, particularly in areas of natural habitat, woodland edges, hedgerows, and wetlands. Ecological sensitive lighting conditions may be imposed in such cases. The Bat Conservation Trust provide the following Guidance Note on Bats and Artificial Lighting.

Biodiversity Issue B6 – Provision of biodiverse and living roofs

To meet policy requirements (HQ/1, NH/4 and Policy 31), the provision of biodiverse roofs and walls will be encouraged as a means to maximise biodiversity, particularly where the opportunities for ecological enhancement on a site area are limited, and where such measures will deliver enhancement at a landscape scale~~.~~ where appropriate, as part of a wider strategy of biodiversity enhancements.

5.5.9. Although buildings can be screened using native species planting, they can also be made attractive to biodiversity by using climbing plants on walls, fitting window boxes or installing biodiverse roofs and walls.
Green roofs should support diverse habitats of local relevance rather than sedum monocultures, which have aesthetic appeal, but limited value to biodiversity. Brown roofs, landscaped with exposed substrates and a varied topography, and supporting nectar and pollen rich flowering plants, are a good alternative. Further information can be found on the Building Research Establishment Environmental Assessment Method webpage for a Green Guide Calculator and Building with Nature.

Figure 9 A biodiverse roof

A biodiverse roof, showing a diversity of flowering plants in an open grassland structure. Habitat design and species mixes should reflect local conditions and stated conservation objectives

5.5.10. Biodiverse roofs can provide valuable habitat on sites where space for new habitat creation is constrained. In the image above, the living roof shows a diversity of flowering plants in an open grassland structure within an otherwise dense, urban setting. Habitat design and species mixes should reflect local conditions and stated conservation objectives

5.5.11. They could also have an especially important role to play in providing new habitat for the species, often ecological specialists, displaced by the development of brownfield sites, and for invertebrates that already live in towns and gardens. Guidance on constructing biodiverse roofs ~~(is~~ available from Buglife and

applicants are encouraged to follow the Green Roof Organisation's Green Roof Code.

5.5.12. Thin substrate sedum systems do not maximize the biodiversity potential of green roofs and would not merit Good condition within the Defra Biodiversity Metric.

Sustainable drainage systems

5.5.13. The Cambridgeshire Flood and Water Supplementary Planning Document was adopted by South Cambridgeshire District Council in November 2018 and Cambridge City Council in December 2018 following adoption of the Cambridge and South Cambridgeshire Local Plans and is accompanied by the Cambridge Sustainable Drainage Design and Adoption Guide.

5.5.14. Inclusion of sustainable drainage systems within a development site are the preferred approach to managing rainfall from hard surfaces and can be used on any site (CC/8, Policy 31). They provide an opportunity to reduce the effects of development on the water environment. Good design and management of multi-functional open spaces can mitigate drainage impacts on wetlands via drains and ordinary watercourses as well as delivering biodiversity enhancements and attractive greenspaces that can support Biodiversity Net Gain on site. SUDs, (like the one pictured below) should be designed to provide natural habitats appropriate to the surrounding landscape, using locally native species and managed to combine functionality and opportunities for biodiversity

5.5.15. The Royal Society for the Protection of Birds and the Wildfowl and Wetlands Trust have produced a guide to maximising the benefit to biodiversity from Sustainable Drainage Systems alongside other functions. The ARGUK Toads – Advice for Planners provide guidance on road, kerb and gully designs to limit impacts on amphibian populations

Figure 10 A SuDS feature in a new development

SuDS features should be designed to provide natural habitats appropriate to the surrounding landscape, using locally native species and managed to combine functionality and opportunities for biodiversity.

5.5.16. Developers should check details of Registered Toad crossings listed by Froglife, the national amphibian & reptile charity, (which includes one in the centre of Cambridge) in relation to the development site location and layout. This will help avoid direct impacts on known toad breeding populations from the discharge of the sustainable drainage systems constructed for the development. Similarly, well designed sustainable drainage systems features are likely to attract breeding amphibians and future ~~migrations~~migration routes should be considered to avoid creating new road or drain fatality hotspots.

5.5.17. Paving of surfaces is likely to contribute to surface water flooding and the Councils will seek to avoid unnecessary paving of gardens by householders (CC/8, Policy 66) and encourage good design to ensure permeable surfaces remain and that there is no net loss in biodiversity. Any trees should be retained within paving and permeable surfaces used, potentially including planting within the design.

Biodiversity issue B7 – Biodiversity net gain

This SPD is underpinned by national and Local Planning Policies. In keeping with these, and the SPD, development proposals will be required to demonstrate measurable net gain for biodiversity (NH/4, NH/6, Policy 69, Policy 70). Biodiversity Net Gain should be achieved on site where possible~~.~~ and in accordance with BS8683:2021 Process for designing and implementing Biodiversity Net Gain

5.5.18. Previous paragraphs have explained the process of how developers will calculate a pre-development baseline for an application site using the Defra Biodiversity Metric ~~2~~3.0 tool. They explain how a calculation should also be made of the post development baseline seeking to identify a net gain in biodiversity on that site. Achieving a Net Gain of 10% would be consistent with levels expected to be required in the Environment ~~Bill, now proposed to be enacted Autumn 2021.~~Act 2021

by Winter 2023, after a two year interim period. However, in keeping with the Councils desire to ensure that biodiversity is both protected, and enhanced, we advise that should new Local Plan policies instruct a higher percentage of BNG than that nationally mandated, that the higher of the two amounts (of BNG) shall be the minimum requirement for development.

5.5.19. The Councils encourage the achievement of ~~In negotiations with applicants, officers may also discuss seeking~~ further Biodiversity Net Gain ~~from~~ by development proposals. This aspiration is supported by the recently formulated Doubling Nature Vision, adopted by South Cambridgeshire District Council (Feb 2021). This vision reflects the growing awareness of biodiversity loss and increasing concerns to protect the natural environment, habitats and species. The vision seeks a 20% level of Biodiversity Net Gain above pre-development baseline conditions. Whilst this Supplementary Planning Document does not set this as a figure or fixed target, this aspiration may have further support with ~~the~~ future ~~enactment of~~amendments to the Environment ~~Bill.~~ Act 2021.

5.5.20. ~~In exceptional cases, compensatory arrangements to provide the levels of BNG~~ Where onsite options for Biodiversity Net Gain have been exhausted, compensatory arrangements to provide shortfalls required and agreed with applicants under the vision can be provided offsite.~~that are both required and agreed with applicants under the vision can be provided off site.~~ Where off-site habitat measures are required, they must be consistent with the strategic aims of the Cambridge Nature Network and Greater Cambridge Green Infrastructure Opportunity Mapping and conform to Biodiversity Net Gain - Good Practice Principles for Development.

5.5.21. To ensure the delivery of BNG measures, the Councils will seek to use planning conditions to secure on site habitat creation and its long-term management, and obligations, such as Section 106 of the Town and Country Planning Act 1990, where BNG is on land outside the applicant's control.

5.5.22. All Biodiversity Net Gain calculations should be submitted using the

Defra Biodiversity Metric ~~2~~3.0 or its successor. Other “bespoke” calculators will not be accepted without clear justification.

5.5.23. There will always be some opportunity within development proposals to create and manage habitats for biodiversity. Development proposals that deliver public open space that also provides new wildlife habitats, with clear management objectives, will be encouraged.

5.5.24. Biodiversity Net Gain has been identified as one of the primary mechanisms for the restoration of biodiversity across the UK and the local need is recognised within the Natural Cambridgeshire Doubling Nature vision. To achieve the vision, a strategic approach to habitat creation and enhancement will be required in line with the Lawton principles of more, bigger, better and more joined up.

5.5.25. This will require focus on improving the condition of existing Biodiversity Sites, increasing their size, and improving connections between them by creating stepping-stones and corridors of biodiversity rich habitats. The existing Cambridge Nature Network lays the foundations for this approach and will be supported and clarified by forthcoming Local Nature Recovery Strategies.

5.5.26. All development must already demonstrate measurable net gain for biodiversity, in line with the requirements of National Planning Policy Framework. Although a mandatory requirement for 10% net gain in biodiversity value is ~~emerging from~~mandated by the Environment ~~Bill~~Act 2021, a value of 20% is likely to be ~~needed~~encouraged as best practice in order to meet the Natural Cambridgeshire target of doubling the amount of land managed for nature from 8% to 16% of the county’s area.

5.5.27. It should be noted that the inclusion of street trees within developments can make a contribution to Biodiversity Net Gain as well as providing a range of other benefits, including to air quality and urban cooling, as mitigation for the effects of climate change. The selection of the right tree species in the right place, where there is enough space to achieve maturity - in terms of height, canopy spread and rooting area - is essential to maximise benefits. Cambridge City Council

has a policy to ensure that adequate provision is made for the preservation and planting of trees when granting planning permission (Policy 71).

5.5.28. For smaller minor development (fewer than 10 residential units or an area of less than 0.5 hectares) and householder applications, biodiversity net gain measures should be clearly identified in supporting information and illustrated on the relevant plans. Measures should be appropriate to the site's location and surroundings and should be focussed on supporting recognised nature conservation priorities. When the Defra "small sites" Biodiversity Metric is available, this should be used to demonstrate net gain in these circumstances, and it is anticipated that the Environment ~~Bill~~Act 2021 might offer this scale of development a more simplified requirement. However, ~~until legislation and~~ further guidance from Government is available, small sites should aim to meet the details of B5 above with at least one integrated bird, bat or insect box, hedgehog friendly fencing and habitats as listed in 5.5.4 above.

5.29. In support of major applications, a Biodiversity Gain Plan will be expected, which should include:

- Steps taken to avoid adverse impacts to biodiversity
- Pre-development and ~~postdevelopment~~post- development biodiversity value (including a completed Defra Biodiversity Metric calculation spreadsheet ~~v2~~v3.0 or its successor)
- Additional information to explain and justify the approach to delivering net gain, including notes on the existing and target habitat condition and any assumptions made

5.5.30. The Local Planning Authority will verify the accuracy of the biodiversity value calculations and consider the merits of any off-site net gain measures with reference to the Biodiversity Opportunity Maps produced by Cambridge and Peterborough Environmental Records Centre, the Cambridge Nature Network and any other published biodiversity strategies. Any scheme of Biodiversity Net Gain must include a mechanism for delivery of the target habitats, management, and monitoring of their condition, and an approach to remediation in the event of targets not being met.

5.5.31. Pre-development biodiversity value must be calculated before any site clearance or other habitat management work has been undertaken, by the applicants or anybody else. ~~If this is known to have happened on or after 30 January 2020, and the onsite habitat condition is lower on the relevant date than it would otherwise have been, the predevelopment biodiversity value of the onsite habitat is to be taken to be its biodiversity value.~~ It should be noted that the baseline for habitats on any site proposed for development will be taken as 30 January 2020, (as set out in the UK Environment Act 2021), or the nearest (in time) prior aerial photographic evidence or survey.

5.5.32. Applicants should refer to the Chartered Institute of Ecology and Environmental Management and Construction Industry Research and Information Association Biodiversity Net Gain Good Practice Principles documents for information on the standards that will be expected.

5.6. Application stage – Validation requirements for biodiversity information

5.6.1. The Cambridge City Council validation checklists and draft South Cambridgeshire District Council validation checklist are available to ensure that applicants know which documents need to be submitted with a planning application for it to be deemed valid by the Greater Cambridge Shared Planning Service.

5.6.2. The Local validation checklist for the Greater Cambridge Shared Planning Service will include guidance under Local Validation Requirement 2 ‘Biodiversity - Ecological Impact Assessment’ about when an Ecological Impact Assessment is necessary, based on what the development involves and where it is. Guidance is also provided on what an Ecological Impact Assessment should cover for an application to be considered valid, including the need to demonstrate measurable Biodiversity Net Gain.

5.6.3. It should be noted that validation does not necessarily mean there is sufficient information to allow for determination. The submitted Ecological Impact Assessment

still has to provide the Councils with certainty of all likely ecological impacts on designated sites and protected or priority species and to demonstrate that effective and deliverable mitigation can be secured either by a condition of any consent or a mitigation licence from Natural England.

Ecological Impact Assessment

5.6.4. In addition to the information within BS42020, the Chartered Institute for Ecology and Environmental Management provides detailed guidance about expectations in the reporting of biodiversity information in support of planning applications. In selecting their project team, applicants are encouraged to choose professional ecologists that will comply with these expectations and can demonstrate their suitability for the role. Full details of those involved in survey work ~~and reporting should be included in all reports with a summary of their experience and competence.~~
and reporting should be included in all reports with a summary of their experience and competence. CIEEM have produced a note on report writing here: https://cieem.net/resource/ guidelines-for-ecological-report- writing

5.6.5. The appropriate document type to provide ecological information in support of a planning application is an Ecological Impact Assessment. This type of ecological report needs to contain all necessary survey results and a full assessment of ecological impacts, with proportionate and fully detailed mitigation and compensation measures that can be secured by condition or obligation, or by appropriate species licensing.

5.6.6. Surveys and reports have a finite lifespan due to the dynamic nature of species populations and the response of habitats to environmental factors and changes in management. CIEEM have produced guidance to highlight the issues with lifespan and the validity of reports in different circumstances. Applications supported by reports that are no longer considered valid are likely to be refused and outline or phased developments are likely to require conditions for further surveys to keep the survey information up to date.

Biodiversity Issue B8 – habitats regulations

To support the councils in meeting policy requirements policy requirements (NH/5 and Policy 69) and their legal duties as Competent Authority under the Conservation of Habitats and Species Regulations 2017 (as amended) – known as the Habitats Regulations - where development is likely to result in a significant effect on a Habitats site, proposals need to be supported by information to support the preparation of the Habitats Regulation Assessment (HRA ~~screening report prepared~~) by the Local Planning Authority. This needs to include the results of any necessary surveys and details of any mitigation measures to avoid adverse effects on the integrity of the site(s) embedded into design of the development.

All the Councils' Habitats Regulations Assessment Appropriate Assessments will be sent to Natural England for their formal consultation response on their conclusions before any decision can be issued.

5.6.7. The aim of the Habitats Regulations Assessment process is to 'maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest'. The Conservation of Habitats and Species Regulations 2017 (as amended) have transposed the European Union Habitats and Wild Birds Directives into UK law to make them operable from 1 January 2021. These remain unchanged until amended by Parliament so the requirements for Habitats Regulations Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) have been retained.

5.6.8. The Greater Cambridge Local Plan may impact on several Habitats sites and Government advice to Local Planning Authorities on Habitats Regulations Assessment requires assessment of any plan or projects which could adversely affect these internationally important Biodiversity Sites.

5.6.9. Where a Habitats site could be affected by a plan, such as a Local Plan, or any project, such as a new development, then Habitats Regulations Assessment

screening must be undertaken. If this cannot rule out any possible likely significant effect on a Habitats site, either alone or in combination with other plans & projects, prior to the consideration of mitigation measures, then an Appropriate Assessment must then be undertaken. ~~The Appropriate Assessment identifies the interest features of the site (such as birds, plants or habitats), how these could be harmed, assesses whether the proposed plan or project could have an adverse effect on the integrity of the Habitats site (either alone or in-combination), and finally how this could be mitigated to meet the Stage 2 Habitats Regulations Assessment "integrity" test.~~ This is an appropriate assessment of the implications for that site in view of that sites conservation objectives. Consent can only be granted when it can be ascertained by an appropriate assessment that there will not be an adverse effect on the integrity of a European Site unless, in the absence of alternative solutions, there are imperative reasons of overriding public interest and the necessary compensatory measures can be secured.

5.6.10. Various Court rulings need to be considered when preparing Habitats Regulations Assessment screening reports and developers are requested to provide sufficient information to support this process. Some key rulings from the Court of Justice for the European Union, which remain relevant to Habitats Regulations Assessment in the UK, post-Brexit, are:

- CJEU People Over Wind v Coillte Teoranta C-323/17)

In line with the Court judgement mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats Site.

- CJEU Holohan C- 461/17

This Court judgement imposes more detailed requirements on the competent authority at Appropriate Assessment stage. These relate to habitats and species for which the site has not been listed and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site. The Appropriate Assessment conclusion must be beyond all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

- CJEU Joined Cases C-293/17 and C-294/17 Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch nitrogen court ruling)

These Dutch cases concerned authorisations schemes for agricultural activities in Habitats sites which cause nitrogen deposition and where levels already exceeded the critical load.

These are not directly connected with or necessary for the management of a Habitats site. This ruling is relevant to projects which trigger appropriate assessment before any consents are issued so should be considered when identifying other plans and projects for an in- combination assessment.

5.6.11. The following case from the UK High Court is also of key relevance:

- R (on the Application of Preston) v Cumbria County Council [2019] EWCA 1362

This case relates to a High Court verdict which quashed a County Council's decision to vary a planning permission for a water company to construct a sewage outfall on a Special Area of Conservation. Therefore, planning authorities and other competent authorities cannot, in appropriate assessments, simply rely on the competence of other regulators such as the Environment Agency, to avoid conducting their own assessments. They must instead themselves satisfy their own Habitats Regulations duties.

Biodiversity Issue B9 – Eversden and Wimpole Woods Special Area of Conservation Bat Protocol

To support the Councils in meeting policy requirements (NH/5 and Policy 69) and their legal duties under the Conservation of Habitats and Species Regulations 2017 (as amended), appropriate levels of survey, assessment and mitigation will be expected for any development that could have an impact on the population Barbastelle Bats within and around the Eversden & Wimpole Woods Special Area of Conservation.

5.6.12. The Eversden and Wimpole Woods Special Area of Conservation supports maternity colonies of Barbastelle bats. In addition to these Special

Area of Conservation woodlands containing roosting sites, the bats also require access to habitats outside the boundary of Eversden & Wimpole Woods Special Area of Conservation. The Habitats Regulation Assessment screening report for Bourn Airfield identified that male Barbastelle bats roosted in woodlands to the north of the Special Area of Conservation and commuted into the woodlands for mating.

5.6.13. Habitat that is integral to supporting the functioning of the Eversden and Wimpole Woods Special Area of Conservation is referred to as functionally linked land. In the case of this internationally important designated site, the woodlands that the males Barbastelle bats roost in, and any commuting routes between the two, are classed as functionally linked land. The Bat Conservation Trust also defines “Core Sustenance Zones” which refer to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost.

5.6.14. Bats also typically forage and commute along linear features, such as hedgerows, rivers and woodland edges. Flight-lines for Barbastelle Bats are known to extend beyond the designated Special Area of Conservation boundary into the wider local landscape. A narrow strip of woodland and hedge that link Wimpole and Eversden Woods together is known to be a very important flight-line for Barbastelle Bats and other bat species, and Natural England has highlighted the importance of managing this feature carefully including the need to thicken hedges affected with additional planting.

5.6.15. A draft protocol has been prepared by the Greater Cambridge Shared Planning Partnership to facilitate sustainable development and secure a diverse and healthy landscape for bats, people and other wildlife.

5.6.16. By following the guidance in the draft Eversden & Wimpole Woods Special Area of Conservation protocol, the Councils can ensure that Special Area of Conservation bat populations thrive and that developments around the designated site avoid impacts on them, thereby preventing delays during their consideration at the planning stage.

5.6.17. The draft bat protocol uses the SITE OF SPECIAL SCIENTIFIC INTEREST Impact Risk Zones identified on the Multi-Agency Geographic Information for the Countryside map for Eversden and Wimpole Woods Special Area of Conservation which are integral to the long-term survival of the population of Barbastelle Bats. All development proposals within this area, with the exception of householder applications, should aim to retain mature trees, woods and copses, and to provide new habitat linkages through new tree planting and the integration of existing hedgerow networks with new ones. All development within 5 km of the Special Area of Conservation designated site is considered by Natural England as a key conservation area with a 10 km sustenance or wider conservation area. Please note that at time of writing, Natural England are reviewing the IRZ distances for this site, possibly extending out to 20km.

5.6.18. The Eversden and Wimpole Woods Special Area of Conservation map below, shows the relative Impact Risk Zones and indicative functionally linked habitat (please note this is for illustrative purposes only so some hedgerows, and smaller woods are not shown).

Figure 11 Eversden and Wimpole Woods SAC

Biodiversity Issue B10 – Recreational pressure on the sensitive Sites of Special Scientific Interest

To meet national and local policy requirements (NH/5 and Policy 69) for protecting and enhancing sites of biodiversity value, applications will not normally be permitted where there is likely to be an adverse impact on land within or adjoining such sites. With specific reference to sensitive Sites of Special Scientific Interest, advice issued by Natural England suggests developers of residential schemes of 50 or more units should seek to provide sufficient Suitable Alternative Natural Greenspace, (SANG) to avoid and mitigate recreational pressure within and around the SSSI. ~~The sensitive Sites of Special Scientific Interest within the Greater Cambridge area are listed in Annex B of Natural England's advice (insert Ref here).~~

SSSIs currently known to be at risk from recreational pressure within the Greater Cambridge area are listed in Annex B of Natural England's advice.

5.6.19. Impact Risk Zones are an online mapping tool developed by Natural England to make an initial assessment of the potential risks to Sites of Special Scientific Interest posed by development proposals. They define zones around each Site of Special Scientific Interest which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal that could potentially have adverse impacts. Impact Risk Zones can be viewed via the Multi-Agency Geographic Information for the Countryside.

5.6.20. Natural England has issued advice to Cambridgeshire Local Planning Authorities in relation to Recreational Pressure Impact Risk Zones relating to sensitive Sites of Special Scientific Interest in Cambridgeshire and the need for green infrastructure within large scale residential developments. Annex B of this advice lists the component Sites of Special Scientific Interest included within the Cambridgeshire Recreational Pressure Impact Risk Zone, of which there are 16 in Greater Cambridge, with a risk category assigned to each Site of Special Scientific Interest. This list could be subject to change, following any new evidence obtained through a specialist visitor survey, for example.

5.6.21. ~~No zone of potential risk was identified by Natural England for Sites of Special Scientific Interest overlapping the Fenland Special Area of Conservation, due to the fact that these sites were not considered to be at significant risk from recreational pressure. In the case of Wicken Fen Ramsar, there is already an evidenced Zone of Influence, but it is the subject of a detailed study from which a new Zone of Influence is emerging. This means that applicants of developments within the Impact Risk Zone of Wicken Fen Special Area of Conservation should seek advice from the National Trust regarding potential recreational pressure impacts and mitigation measures.~~ See earlier text under B10 Applicants of developments within the Impact Risk Zone of Wicken Fen Special Area of Conservation should seek advice from the National Trust regarding potential recreational pressure impacts and mitigation measures.

5.6.22. Where a development location triggers a recreational pressure Impact Risk Zone on the Multi- Agency Geographic Information for the Countryside plan, a pop-up note will appear advising developers of residential proposals of the need for an assessment of recreational pressure effects on the relevant SSSI and the provision of measures to mitigate potential adverse impact. Whilst current Local Plan policies do not set requirements in respect of SANG, developers need to consider how to implement this detailed advice from Natural England, in conjunction with the councils' Open Space standards to provide access to sufficient greenspace to meet daily recreational needs of new residents. It is expected developers will seek further advice on this issue from Natural England's Discretionary Advice Service.

5.6.23 Non statutory Local Wildlife Sites can also be impacted by increased recreational pressure. Negative impacts will need to be recognised and addressed as a material consideration of any nearby development proposals.

Determination of planning applications

5.6.23. The Councils need certainty of likely impacts on a Biodiversity Site or protected or Priority species prior to determination to ensure that appropriate and effective mitigation measures can be secured either by a condition of any consent or under a mitigation licence from Natural England.

5.6.24. To support determination of planning applications, the Councils therefore expect adequate ecological information to be provided. Where no ecological report has been submitted and there is a likelihood of biodiversity being present and affected by a proposal, applicants will be requested to provide reasonable information in line with Government Standing Advice which could cause delays for example waiting for surveys to be carried out in the appropriate season. If, despite any request from the Councils, this is not provided to give certainty of likely impacts and details of effective and deliverable mitigation measures, the Councils may refuse an application rather than requiring amendments to avoid impacts.

5.6.25. Where ecology reports include recommendations for further surveys, these will be needed prior to determination. The Councils encourage applicants to

ensure that recommendations for mitigation and compensation measures have been embedded into the design of a proposal and that they confirm delivery at the appropriate stage to support determination of a planning application. The above is relevant to Outline Planning Applications too.

5.6.26. Where impacts on biodiversity will be minimised such that the proposal is acceptable, all ecological mitigation, compensation and enhancements to deliver measurable net gain for biodiversity will either be a condition of the consent or included in a legal agreement. This will not include protected species surveys as this information is needed prior to determination.

5.6.27. Updated protected species surveys and mitigation strategies will need to be submitted at reserved matters stage for any measures not fully detailed in the information provided to support determination of outline or phased applications.

5.7. Construction stage

Construction and the need for protection of features and ecological supervision

5.7.1. The construction process often involves clearance of vegetation on site which has the potential for impacts on biodiversity and there is therefore a need to manage the risks to wildlife. A process is also needed to ensure that all of the essential ~~mitigation measures identified within the Ecological Impact Assessment are put in place in the right way and at the right time.~~ mitigation measures identified within the Ecological Impact Assessment are put in place in the right way and at the right time.

5.7.2. A Construction Environment Management Plan: Biodiversity will be required by condition for many developments ~~to~~. The requirement for and timing of this will be decided on a case-by-case basis and include details of all necessary ecological mitigation measures, including protection of retained habitats and requirements for ecological supervision during works on site using a suitably experienced Ecological Clerk of Works. The details required are specified in model condition D.4.1 of BS42020:2013.

5.8. Post-construction stage

Management plans, monitoring and enforcement

5.8.1. Where habitats are retained and created within a development site boundary, the Councils will seek to secure their protection during the construction process and their ~~longterm~~long- term management via conditions of any consent. The Councils will require relevant details to be provided within a Landscape and Ecological Management Plan, either at submission or secured by condition. This type of planning condition will need details of all ecological mitigation measures should be illustrated together with other landscape measures and there should be no conflict between objectives.

5.8.2. Where species are predicted to be affected by development proposals and habitat to support their population is retained or created on site, such as receptor sites for translocated animals, the Councils will seek to include monitoring of the effectiveness of mitigation secured. This will be separate from any legal requirement attached to a licence approved by Natural England and will be secured by a condition of any consent. Additional monitoring may be required for novel mitigation solutions, the outcomes of which should be made available to the wider ecological consultancy industry where appropriate.

5.8.3. All management plans should include appropriate monitoring to ensure effectiveness and should include a process for remediation and review for any measures that have not been effective. The results of such monitoring should be reported to the Councils for review of management.

5.8.4. To deliver Biodiversity Net Gain, sites will require careful design, zoning and management to ensure there are no recreational conflicts with the proposed areas for habitat creation. The ~~emerging~~ Environment ~~Bill is likely to~~Act 2021 will require an audit trail for the delivery of Biodiversity Net Gain commitments for a period of up to 30 years.

Appendices

Appendix 1 Local Plan policies to be supported by this Supplementary Planning Document

Adopted South Cambridgeshire Local Plan September 2018

Chapter 4 Climate Change

Policy CC/8, Sustainable Drainage Systems

Development proposals must incorporate appropriate sustainable surface water drainage systems (SuDS) appropriate to the nature of the ~~sire~~site. Development proposals will be required to demonstrate that:
b) Opportunities have been taken to integrate sustainable drainage with the development, create amenity, enhance biodiversity, and contribute to a network of green (and blue) open space.
d) Maximum use has been made of low land take drainage measures, such as rainwater recycling, green roofs, permeable surfaces, and water butts”

Chapter 5, Delivering High Quality Places.

Policy HQ/1, Design Principles

“All new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its local and wider context. As appropriate to the scale and nature of the development, proposals must: ... Include high quality landscaping and public spaces that integrate the development with its surroundings, having a clear definition between public and private space which provide opportunities for recreation, social interaction as well as support healthy lifestyles, biodiversity, sustainable drainage and climate change mitigation.”

Chapter 6, Built and Natural Environment.

Policy NH/3, Protecting Agricultural Land 1.

“Planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless:
a) Land is allocated for development in the Local Plan
b) Sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land.
2. Uses not involving substantial built development but which take agricultural land will be regarded as permanent unless restricted specifically by condition.
When considering proposals for the change of use or diversification of farmland, particular consideration shall be given to the potential for impact upon Priority Species and Habitats.”

Chapter 6, Built and Natural Environment.

Policy NH/4, Biodiversity 1.

“1. Development proposals where the primary objective is to conserve or enhance biodiversity will be permitted.
2. New development must aim to maintain, enhance, restore, or add to biodiversity. Opportunities should be taken to achieve positive gain through the form and design of development. Measures may include creating, enhancing, and managing wildlife habitats and networks, and natural landscape. The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation. Priority for habitat creation should be given to sites which assist in the achievement of targets in the Biodiversity Action Plans (BAPs) and aid delivery of the Cambridgeshire Green Infrastructure Strategy.
3. If significant harm to the population or conservation status of a Protected Species, Priority Species1 or Priority Habitat resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will be refused.

4. Where there are grounds to believe that a proposal may affect a Protected Species, Priority Species or Priority Habitat, applicants will be expected to provide an adequate level of survey information and site assessment to establish the extent of a potential impact. This survey information and site assessment shall be provided prior to the determination of an application.
5. Previously developed land (brownfield sites) will not be considered to be devoid of biodiversity. The reuse of such sites must be undertaken carefully with regard to existing features of biodiversity interest. Development proposals on such sites will be expected to include measures that maintain and enhance important features and appropriately incorporate them within any development of the site.
6. Planning permission will be refused for development resulting in the loss, deterioration, or fragmentation of irreplaceable habitats, such as ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss. Climate change poses a serious threat to biodiversity and initiatives to reduce its impact need to be considered."

Chapter 6, Built and Natural Environment.

Policy NH/5, Site of Biodiversity or Geological Importance

1. "Proposed development likely to have an adverse effect on land within or adjoining a Site of Biodiversity or Geological Importance, as shown on the Policies Map (either individually or in combination with other developments), will not normally be permitted. Exceptions will only be made where the benefits of the development clearly outweigh any adverse impact.
2. In determining any planning application affecting Sites of Biodiversity or Geological Importance the Council will ensure that the intrinsic natural features of particular interest are safeguarded or enhanced having regard to:
a) The international, national or local status and designation of the site;
b) The nature and quality of the site's features, including its rarity value;
c) The extent of any adverse impacts on the notified features;
d) The likely effectiveness of any proposed mitigation with respect to the protection of the features of interest;

e) The need for compensatory measures in order to re-create on or off the site features or habitats that would be lost to development. Where appropriate the Council will ensure the effective management of designated sites through the imposition of planning conditions or Section 106 agreements as appropriate."

Chapter 6, Built and Natural Environment.

Policy NH6, Green Infrastructure

1. The Council will aim to conserve and enhance green infrastructure within the district. Proposals that cause loss or harm to this network will not be permitted unless the need for and benefits of the development demonstrably and substantially outweigh any adverse impacts on the district's green infrastructure network.
2. The Council will encourage proposals which:
a. Reinforce, link, buffer and create new green infrastructure; and
b. Promote, manage, and interpret green infrastructure and enhance public enjoyment of it.
3. The Council will support proposals which deliver the strategic green infrastructure network and priorities set out in the Cambridgeshire Green Infrastructure Strategy, and which deliver local green infrastructure. All new developments will be required to contribute towards the enhancement of the green infrastructure network within the district. These contributions will include the establishment, enhancement and the ongoing management costs."

Chapter 6, Built and Natural Environment.

Policy NH/7, Ancient Woodlands and Veteran Trees

"Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland (as shown on the Policies Map) or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/2 Development Principles

Development proposals affecting ancient woodland or veteran trees will be expected to mitigate any adverse impacts, and to contribute to the woodland's or veteran tree's management and further enhancement via planning conditions or planning obligations."

"Plans to be Approved: …

The town of Northstowe will be developed:

h. Making drainage water features an integral part of the design of the town and its open spaces, so that they also provide for amenity, landscape, biodiversity and recreation

Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/12 Landscape Principles

"The Landscape Strategy will: …

b) Ensure a high degree of connectivity between the new town and wider countryside for wildlife and people, including extending the rights of way network (public footpaths and bridleways);

… f) Create a network of green spaces which contribute to legibility, are pleasant, attractive, and beneficial to wildlife, and integrate will with the wider countryside;

g) Enable landscaped areas to provide an environment suitable to mitigate any adverse wildlife impacts and to maximise the benefits to wildlife thus increasing biodiversity.

2. Construction spoil retained on site must be distributed in a manner appropriate to the local topography and landscape character, and can be used for noise mitigation, flood risk management or biodiversity enhancement."

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/13 Landscape Treatment of the Edges of Northstowe

"The Eastern Water Park: A landscaped water park with appropriate planting and footpaths will be provided on the other edge of Northstowe to the east along the St Ives railway. The water park will provide an attractive amenity for the town and a landscape buffer to the open countryside. It will also provide opportunities to create wildlife habitats and thus increase biodiversity."

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/14 Landscaping within Northstowe

"Green Corridors …
They will have landscaping and biodiversity value and also perform a recreational function for both informal recreation and children's play. Public access will include provision for walking, cycling and horse riding. Road and bus crossings through the Green Corridors will be designed to limit any adverse safety implications for people and be low key in character to limit adverse effects on the landscape. Safe and appropriate crossing facilities for wildlife will also be provided, such as tunnels under roads and ditches alongside roads where appropriate."

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/16 Existing Biodiversity Features

"Biodiversity Surveys:
1. Developers will be required to undertake a full programme of ecological survey and monitoring prior to the commencement of construction. This work should

conclude by proposing a strategy for the protection and enhancement of biodiversity, and Biodiversity Management Plans, to establish:
a. Which areas of biodiversity will be protected and enhanced;
b. Appropriate mitigation measures;
c. Which specific impacts of development will need to be monitored during and after construction.
Further ecological surveys will be required during and after construction, and the Biodiversity Strategy and Management Plans will be reviewed in the light of surveys and monitoring.

Management Strategy:

1. The developer will be required to develop a Management Strategy to ensure high quality, robust and effective implementation, adoption, and maintenance of the biodiversity areas.

Retention of Existing Features: Existing features including trees, tree plantations and the lake in the southern section of the airfield and the existing ponds in the golf course will be retained as biodiversity and landscape features where such features can make a significant contribution to the urban environment or to the biodiversity of the site."

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/17 New Biodiversity Features

"Eastern Water Park:
1. The water park along the eastern boundary of the town and west of the disused railway, which will be created to provide for the attenuation of surface water flows, will be managed to enhance the biodiversity of Northstowe by providing an extensive wetland habitat and to maximise its value to key species. Southern Parkland Country Park:

2. A parkland landscape will be created between Northstowe and Oakington to provide a substantial resource of trees, grassland, and other areas of semi-natural vegetation. This area will be designed and managed for its wildlife value. Green Corridors Through and Beyond the Town:
3. Green corridors will be established through the town to connect where possible to biodiversity features and corridors beyond the town. Creating Habitats Within the Urban Area: Every opportunity will be taken to incorporate features within the urban fabric, through urban design and through the use of sympathetic materials to create wildlife habitats."

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/24 Construction Strategy Site Access and Haul Roads:

2. A scheme will be introduced to avoid construction vehicles travelling through villages in the locality and to ensure that any haul roads are located, designed and landscaped in such a way as to minimise any noise, smell, dust, visual or other adverse impacts on existing residents and businesses, and on the new residents and businesses at Northstowe. They should also avoid adverse effects on the environmental amenities of biodiversity, rights of way and green spaces. Traffic flows will be monitored to ensure that the public have a mechanism to feedback any concerns that arise during development. Construction Activities: Planning conditions will be imposed to minimise the adverse effects of construction activity on residential amenity and the environment"

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/27 Management of Services, Facilities, Landscape and Infrastructure

"Management strategies for services, facilities, landscape and infrastructure will be submitted to the local planning authority for adoption prior to the granting of outline planning permission to ensure high quality, robust and effective implementation, adoption and maintenance. Landownership for these uses should be as simple as possible, preferably in a single ownership to avoid fragmentation. In particular, there should be a single agreed Management Strategy covering recreation, landscape, and biodiversity. The inclusion of water and drainage features within open spaces would have significant advantages and should therefore be investigated."

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/4, The Setting of Cambridge East Green Corridor:

1. "A green corridor will be retained through the new urban quarter connecting the green spaces of Cambridge to the surrounding countryside, linking from Coldham's Common to a new country park located to the east of Airport Way and south of Newmarket Road, and also to the National Trust's Wicken Fen Vision. The green corridor will have width of about 300m and be significantly narrower only where particular justification is provided and the green corridor function is not inhibited. It will open up to a greater width a the Teversham end of the corridor, where an informal countryside character will be provided to help to maintain the individual identity of the village. It will have landscaping and biodiversity value and also perform a recreational function for both informal recreation and children's play."

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/4, The Setting of Cambridge East.

Policy CE/13 Landscape Principles Landscape Strategy:

"The Strategy will: a. To ensure a high degree of connectivity between the new urban quarter and the wider countryside for wildlife and people; … Enable the landscaped areas within the urban quarter to provide an environment suitable to mitigate against any adverse wildlife impacts and to maximise the benefits to

wildlife thus increasing biodiversity" Local Development Framework: Cambridge East Area Action Plan (Feb 2008). Policy CE/14, Landscaping within Cambridge East Green Fingers: 3. "They will have landscaping and biodiversity value and also perform a recreational function for both informal recreation and children's play. Public access will include provision for walking, cycling and horse riding. Road and bus crossings through the green fingers will be designed to limit any adverse safety implication for people and be low key in character to limit adverse effects on the landscape. Safe and appropriate crossing facilities for wildlife will also be provided, such as tunnels under roads and ditches alongside roads where appropriate"

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/16, Biodiversity 1.

"The development of Cambridge East will have regard to the conservation and enhancement of biodiversity, and every opportunity should be taken to achieve positive gain to biodiversity through the form and design of development. As appropriate, measures will include creating, enhancing, and managing wildlife habitats and natural landscape. Priority for habitat creation should be given to sites which assist in achieving targets in the Biodiversity Action Plans (BAPs).
2. Development will not be permitted if it would have an adverse impact on the population or conservation status of protected species or priority species or habitat unless the impact can be adequately mitigated by measures recurred by Section 106 agreements or planning conditions.
3. Where there are grounds to believe that development proposal may affect a protected species or priority species or habitat, applicants will be expected to provide an adequate level of survey information to establish the extent of the potential impact together with possible alternatives to the development, mitigation schemes and / or compensation measures.
4. Development proposals will take account of the impact, either direct or indirect, on people's opportunity to enjoy and experience nature on a site together with opportunities to improve public access to nature. Exceptionally, where the economic

or social benefits of a proposal outweigh harm to an important site or species, the approach will be first to avoid or minimise the harm, then to seek mitigation of the impact, and finally to secure appropriate compensation for any residual impact in order to ensure no net loss of biodiversity. Planning conditions and obligations will be used as appropriate to secure this."

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/17, Existing Biodiversity Features Biodiversity Surveys:

1. "Developers will be required to undertake a full programme of ecological survey and monitoring prior to the commencement of construction. This work should conclude by proposing a strategy for the protection and enhancement of biodiversity, and Biodiversity Management Plans, to establish:

a. Which areas of biodiversity will be protected and enhanced;

b. Appropriate mitigation measures;

c. Which specific impacts of development will need to be monitored during and after construction. Further ecological surveys will be required during and after construction, and the Biodiversity Strategy and Management Plans will be reviewed in the light of surveys and monitoring.

Management Strategy:

2. The developer will be required to develop a Management Strategy to ensure high quality, robust and effective implementation, adoption, and maintenance of the biodiversity areas. Retention of Existing Features:

3. Existing features including trees in the Park and Ride site will be retained as biodiversity and landscape features.

4. Development will not be permitted if it will have an adverse impact on a Local Nature Reserve (LNR), a Country Wildlife Site (CWS), or a City Wildlife Site (CiWS) unless it can be clearly demonstrated that there are reasons for the proposal, which outweigh the need to safeguard the substantive nature conservation of the site. Where development is permitted, proposals should include measures to minimise harm, to secure suitable mitigation and / or compensatory measures, and where possible enhance the nature conservation value of the site affected through habitat creation and management.

New Biodiversity Features:

As part of the development of the urban quarter, new biodiversity features will be provided in the green corridor and green fingers, together with, in the country park, a substantial resource of trees, grassland and other areas of semi-natural vegetation which is sympathetic to local landscape character. Creating Habitats within the Urban Area: Every opportunity will be taken to incorporate features within the urban fabric, through urban design and through the use of sympathetic materials to create wildlife habitats."

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/29, Construction Strategy Site Access and Haul Roads:

"A scheme will be introduced to avoid construction traffic travelling through residential areas in the city and villages in the locality and ensure that any haul roads are located, designed and landscaped in such a way as to minimise any noise, smell, dust, visual or other adverse impacts on existing residents and businesses, and on the new residents and businesses at Cambridge East. They should also avoid adverse effects on the environmental amenities of biodiversity, rights of way and green spaces. Traffic flows will be monitored to ensure that the public have a mechanism to feedback any concerns that arise during development. Construction Activities: Planning conditions will be imposed to minimise the adverse effects of construction activity on residential amenity and the environment"

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/31, Management of Services, Facilities, Landscape and Infrastructure "

Management strategies for services, facilities, landscape and infrastructure will be submitted to the local planning authority for adoption prior to the granting of outline planning permission to ensure high quality, robust and effective implementation, adoption and maintenance. Landownership for these uses should be as simple as possible, preferably in a single ownership to avoid fragmentation. In particular, there should be a single agreed Management Strategy covering recreation, landscape, and biodiversity. The inclusion of water and drainage features within open spaces would have significant advantages and should therefore be investigated."

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/33, Infrastructure Provision

"Planning permission will only be granted at Cambridge East where there are suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms. Contributions will be necessary for some or all of the following: … Landscaping and biodiversity"

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/2 Development and Countryside Improvement Principles

"Trumpington West will be developed: …
9. To achieve a net increase in biodiversity across the site;
10. Making drainage water features an integral part of the design of the urban extension and its open spaces, so they also provide for amenity, landscape, biodiversity, and recreation. … Trumpington West will connect the green spaces of Cambridge to the surrounding countryside, maintain a Green Corridor along the River Cam, and provide landscape, biodiversity and public access enhancements in the surrounding countryside."

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/5 Countryside Enhancements Strategy

"1. Planning permission for development at Trumpington West will include a planning obligation requirement for contributions to the implementation of a Countryside Enhancement Strategy which will create an enhanced gateway into the City between Hauxton Road and the River Cam and which will comprise:
a. The creation of a country park, comprising new meadow grassland, to the east of the River Cam, both north and south of the M11, from Grantchester Road to Hauxton Mill;

b. Hedgerow planting on field boundaries in the agricultural land between Hauxton Road and the Trumpington Meadows Country Park; …
d. Measures to protect and enhance wildlife habitats, including managing public access to the riverbanks;
e. Noise attenuation on the northern side of the M11 through the creation of new landscape features which are compatible with the river valley character.
2. A Countryside Enhancement Strategy will be prepared for the area bounded by the Cambridge City boundary, Babraham Road, Haverhill Road, and the edge of the built area of Great Shelford and Stapleford. The Strategy will comprise:
f. New copses on suitable knolls, hilltops, and scarp tops.
g. Management and creation of chalk grassland h. Management of existing shelter belts.
i. New mixed woodland and shelter belts.
j. Creation of a landscape corridor along Hobson's Brook.
k. Reinforcement and planting of new hedgerows.
l. Roadside planting.
3. The Countryside Strategies will include integrated proposals for landscape, biodiversity, recreation, and public access improvements, which will be compatible with long-term agricultural production to create enhanced gateways into the City. Provision will be made for maintenance of landscaping and replacement of diseased, dying, and dead stock for a period of 10 years, and details of long-term management thereafter."

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/12 Landscape Principles

1. "A Landscape Strategy for Trumpington West must be submitted and approved prior to the granting of planning permission, of a level of detail appropriate to the type of application. It will be implemented as part of the conditions / planning obligations for the development of the urban extension. The strategy will:

f. Enable the landscaped areas within the urban extension to provision an environment suitable to mitigate any adverse wildlife impacts and to maximise the benefits to wildlife thus increasing biodiversity;
h. Make best use of and enhance existing tree and hedge resources as a setting for the development."

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/13 Landscaping within Trumpington West

Green Fingers:

1. "They will have landscaping and biodiversity value and also perform a recreational function for both informal recreation and children's play. Public access will include provision for walking, cycling and horse riding. Road and bus crossings through the green fingers will be designed to limit any adverse safety implication for people and be low key in character to limit adverse effects on the landscape. Safe and appropriate crossing facilities for wildlife will also be provided, such as tunnels under roads and ditches alongside roads where appropriate"

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/15 Enhancing Biodiversity

1. "Outline planning applications for development at Trumpington West will be accompanied by a comprehensive ecological survey of flora and fauna. This will include land bounded by the River Cam and Hauxton Road as far south as Hauxton Mill. Managing Enhancing Biodiversity:
2. All open areas will be managed and landscaped to encourage wildlife in locally distinctive habitats. Sensitive habitats will be protected by limiting public access to specified areas.

3. A Biodiversity Management Strategy will demonstrate how biodiversity will be enhanced and how local communities will be involved. A project officer will be funded to implement the strategy through a planning obligation. Green Fingers and the Countryside: Connections will be provided for Green Fingers within the urban extensions to the surrounding countryside by enhanced landscaping, planting and the creation of wildlife habitats to provide links to larger scale wildlife habitats to provide links to larger scale wildlife habitats further afield including Nine Wells, the Magog Down, Wandlebury Country Park, the River Cam corridor, Coton Country Park, Wimpole Hall and Wicken Fen."

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/22 Construction Strategy Site

Access and Haul Roads:

1. "A scheme will be introduced to avoid construction traffic travelling through Trumpington and villages in the locality and ensure that any haul roads are located, designed and landscaped in such a way as to minimise any noise, smell, dust, visual or other adverse impacts on existing residents and businesses, and on the new residents and businesses at Trumpington West. They should also avoid adverse effects on the environmental amenities of biodiversity, rights of way and green spaces. Traffic flows will be monitored to ensure that the public have a mechanism to feedback any concerns that arise during development. … Construction Activities: Planning conditions will be imposed to minimise the adverse effects of construction activity on residential amenity and the environment"

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/24 Management of Services, Facilities, Landscape and Infrastructure

"1. Management strategies for services, facilities, landscape, and infrastructure will be submitted to the local planning authority for adoption prior to the granting of outline planning permission to ensure high quality, robust and effective implementation, adoption, and maintenance. Landownership for these uses should be as simple as possible, preferably in a single ownership to avoid fragmentation. In particular, there should be a single agreed Management Strategy covering recreation, landscape, and biodiversity. The inclusion of water and drainage features within open spaces would have significant

Local Development Framework: North West Cambridge Area Action Plan, October 2009.

Policy NW2: Development Principles

"2. Development proposals should, as appropriate to their nature, location, scale, and economic viability:
f) Protect and enhance the geodiversity and biodiversity of the site and incorporate historic landscape and geological features;
3. Planning permission will not be granted where the proposed development or associated mitigation measures would have an unacceptable adverse impact:
n) On biodiversity, archaeological, historic landscape, and geological interests;
s) On protected trees and trees of significance"

Local Development Framework: North West Cambridge Area Action Plan, October 2009.

Policy NW4: Site and Setting

"Land between Madingley Road and Huntingdon Road, comprising two areas totalling approximately 91ha, as shown on the Proposals Map, is allocated for predominantly University-related uses. A strategic gap is retained between the two parts of the site to ensure separation is maintained between Cambridge and Girton village and to provide a central open space for reasons of biodiversity, landscape, recreation and amenity, whilst ensuring a cohesive and sustainable for of development."

Local Development Framework: North West Cambridge Area Action Plan, October 2009.

Policy NW24: Climate Change & Sustainable Design and Construction

"1. Development will be required to demonstrate that is has been designed to adapt to the predicted effects of climate change;
2. Residential development will be required to demonstrate that
b) All dwellings approved on or after 1 April 2013 will meet Code for Sustainable Homes Level 5 or higher;
c) There is no adverse impact on the water environment and biodiversity as a result of the implementation and management of water conservation measures.
3. Non-residential development and student housing will be required to demonstrate that:
d) it will achieve a high degree of sustainable design and construction in line with BREEAM "excellent" standards or the equivalent if this is replaced;
e) It will incorporate water conservation measures including water saving devices, greywater and/or rainwater recycling in all buildings to significantly reduce potable water consumption; and

g) There is no adverse impact on the water environment and biodiversity as a result of the implementation and management of water conservation measures.“

Local Development Framework: North West Cambridge Area Action Plan, October 2009.

Policy NW25: Surface Water Drainage

1. “Surface water drainage for the site should be designed as far as possible as a sustainable drainage system (SuDS) to reduce overall run-off volumes leaving the site, control the rate of flow and improve water quality before it joins any water course or other receiving body;
2. The surface water drainage system will seek to hold water on the site, ensuring that it is released to surrounding water courses at an equal, or slower, rate that was the case prior to development;
3. Water storage areas should be designed and integrated into the development with drainage, recreation, biodiversity, and amenity value; and Any surface water drainage scheme will need to be capable of reducing the downstream flood risk associated with storm events as well as normal rainfall events. All flood mitigation measures must make allowance for the forecast effects of climate change.”

Cambridge Local Plan 2018

Policy 7: The River Cam

Development proposals along the River Cam corridor should:
a. include an assessment of views of the river and a demonstration that the proposed design of the development has taken account of the assessment in enhancing views to and from the river;
b. preserve and enhance the unique physical, natural, historically, and culturally distinctive landscape of the River Cam;
c. raise, where possible, the quality of the river, adjacent open spaces, and the integrity of the built environment in terms of its impact, location, scale, design, and form;

d. propose, where possible and appropriate to context, enhancement of the natural resources of the River Cam and offer opportunities for re-naturalisation of the river;
e. enable, where possible, opportunities for greater public access to the River Cam; and
f. take account of and support, as appropriate, the tourism and recreational facilities associated with the river.

Cambridge Local Plan 2018

Policy 8: Setting of the city

“Development on the urban edge, including sites within and abutting green infrastructure corridors and the Cambridge Green Belt, open spaces and the River Cam corridor, will only be supported where it: includes landscape improvement proposals that strengthen or recreate the well-defined and vegetated urban edge, improve visual amenity, and enhance biodiversity

Cambridge Local Plan 2018

Policy 31: Integrated water management

Development will be permitted provided that:
f) any flat roof is a green or brown roof, providing that it is acceptable in terms of its context in the historic environment of Cambridge and the structural capacity of the roof if it is a refurbishment. Green or brown roofs should be widely used in large-scale new communities; … development adjacent to a water body actively seeks to enhance the water body in terms of its hydro morphology, biodiversity potential and setting.”

Cambridge Local Plan 2018

Policy 52: Protecting garden land and the subdivision of existing dwelling plots

“Proposals for development on sites that form part of a garden or group of gardens or that subdivide an existing residential plot will only be permitted where: b. sufficient garden space and space around existing dwellings is retained, especially where these spaces and any trees are worthy of retention due to their contribution to the character of the area and their importance for biodiversity.”

Cambridge Local Plan 2018

Policy 57: Designing new buildings

“High quality new buildings will be supported where it can be demonstrated that they include an appropriate scale of features and facilities to maintain and increase levels of biodiversity in the built environment”

Cambridge Local Plan 2018

Policy 58: Altering and extending existing buildings

“Alterations and extensions to existing buildings will be permitted where they: do not adversely impact on the setting, character or appearance of listed buildings or the appearance of conservation areas, local heritage assets, open spaces, trees or important wildlife features;”

Cambridge Local Plan 2018

Policy 59: Designing landscape and the public realm

“External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with

adjacent sites and phases. High quality development will be supported where it is demonstrated that: species are selected to enhance biodiversity through the use of native planting and/or species capable of adapting to our changing climate”

Cambridge Local Plan 2018

Policy 66: Paving over front gardens

“Proposals for the paving over of front gardens will only be permitted where it can be demonstrated that: …
c. it will not result in a net loss of biodiversity”

Cambridge Local Plan 2018

Policy 69: Protection of sites of local nature conservation importance

“In determining any planning application affecting a site of biodiversity or geodiversity importance, development will be permitted if it will not have an adverse impact on, or lead to the loss of, part of all of a site identified on the Policies Map. Regard must be had to the international, national, or local status and designation of the site and the nature quality of the site’s intrinsic features, including its rarity. Where development is permitted, proposals must include measures:
a. to minimise harm;
b. to secure achievable mitigation and/or compensatory measures; and
c. where possible enhance the nature conservation value of the site affected through habitat creation, linkage, and management. In exceptional circumstances, where the importance of the development outweighs the need to retain the site, adequate replacement habitat must be provided. Any replacement habitat must be provided before development commences on any proposed area of habitat to be lost.”

Cambridge Local Plan 2018

Policy 70: Protection of priority species and habitats

"Development will be permitted which:
a. protects priority species and habitats; and
b. enhances habitats and populations of priority species.
Proposals that harm or disturb populations and habitats should:
c. minimise any ecological harm; and
d. secure achievable mitigation and/or compensatory measures, resulting in either no net loss or net gain of priority habitat and local populations of priority species.

Where development is proposed within or adjoining a site hosting priority species and habitats, or which will otherwise affect a national priority species or a species listed in the national and Cambridgeshirespecific biodiversity action plans (BAPs), an assessment of the following will be required:
e. current status of the species population;
f. the species' use of the site and other adjacent habitats;
g. the impact of the proposed development on legally protected species, national and Cambridgeshire-specific BAP species, and their habitats; and
h. details of measures to fully protect the species and habitats identified.

If significant harm to the population or conservation status of protected species, priority species or priority habitat resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission will be refused."

Cambridge Local Plan 2018

Policy 71: Trees

"Development will not be permitted which involves felling, significant survey (either now or in the foreseeable future) and potential root damage to trees of amenity or other value, unless there are demonstrable public benefits accruing from the

proposal which clearly outweigh the current and future amenity value of the trees. Development proposals should:

a. preserve, protect, and enhance existing trees and hedges that have amenity value as perceived from the public realm;

b. provide appropriate replacement planting, where felling is proved necessary; and

c. provide sufficient space for trees and other vegetation to mature.

Particular consideration should be given to veteran or ancient trees, as defined by Natural England, in order to preserve their historic, ecological and amenity value."

Appendix 2 Guidance on protected species and ecological survey seasons

This provides a rough guide to the seasonality of ecological survey to illustrate the potential impact on the submission of information in support of a planning application. A suitably qualified ecologist should always be consulted to provide site specific advice on appropriate methodologies and timing, which may depend on weather conditions.

Table 1 Ecological Survey seasons

Ecological Area	Survey Season
Preliminary Ecological Appraisals	Surveys are possible year-round.
Botanical Surveys	As appropriate to plant community from June to August. Marginal opportunities from April to May, and September.
Breeding Birds	Six survey visits across the season from March to June. Marginal opportunity in July.
Wintering Birds	At least monthly from January to February and November to December.
Badgers	Surveys for evidence can be undertaken year-round. Bait marking and sett surveys from February to April and September to November. Breeding season, limited surveying from May to August and December to January. Licensable season for disturbance from July to November.
Bats	Potential Roost Assessment Surveys are possible year-round. Emergence and Activity Surveys from May to September. Marginal opportunities in April and October, depending on temperature.
Hazel Dormice	Nest tube survey with monthly checks throughout season, to achieve minimum level of effort from April to November.
Reptiles	Weather conditions are important from April to July and September. Marginal opportunities in March, August, and October to November.

Water Voles	Habitat assessment possible year-round. Two surveys required. The first survey from April to June. The second survey from July to September. This identifies breeding territories and latrines. Marginal opportunities for the two surveys from October to November.
Otters	Surveys are possible all year-round. Great Crested Newts Habitat assessment possible year-round. Four aquatic surveys which must include two surveys from mid-April to May. eDNA survey season from mid-March to end of June. Marginal opportunities in March, and from July to August.
White Clawed Crayfish	Habitat assessment possible year-round. Netting survey from July to November.
Invertebrates	Optimal survey time April to September