



Planning Appeal Re:APP/W0530/W/21/3280395
Land between Haverhill Road and Hinton Way,
Stapleford, Cambridge

Ecology & Biodiversity Proof of Evidence – November 2021

Dr Duncan Painter CEnv MCIEEM

SUMMARY AND CONCLUSIONS

- 1.1 My name is Duncan Painter, I am a Chartered Environmentalist (CEnv) and Full Member of the Chartered Institute of Ecology & Environmental Management (CIEEM). I have been practising as a professional ecologist for over 31 years and have extensive experience in ecological survey/assessment and ecological mitigation and compensation planning to help enable development.
- 1.2 I have a doctorate in ecology and habitat management from the University of Cambridge, and I am the Managing Director and owner of an independent ecological consultancy that I founded in 2005 called Applied Ecology Ltd.
- 1.3 My proof of evidence confirms that the development proposal will facilitate a highly significant biodiversity enhancement in a location where local biodiversity and emerging green infrastructure planning policy has identified a strategic need for ecological enhancement of the type that is being proposed.
- 1.4 South Cambridgeshire District Council declared an ecological emergency within their administrative area in July 2019 recognising that Cambridgeshire had seen an unprecedented decline in biodiversity as a result of anthropogenic activity (see **Appendix A**). The proposed Countryside Park would make a significant contribution to reversing this trend by creating a new large area of calcareous grassland in a location strategically located to link together other chalk grassland wildlife sites in this part of Cambridge.



- 1.5 Calcareous grassland is a rare habitat type of high biodiversity value and, in Cambridgeshire, supports a very rich flora and fauna including many nationally rare and scarce species. Much of England's calcareous grassland was lost to the plough as a result of increasing food production following the advent of World War II. Nationally the cover of calcareous grassland has suffered a sharp decline in extent over the last 80 years, and Cambridgeshire has mirrored this trend over the same time period with only around 101 ha of chalk grassland thought to remain in the Gog Magog Hills area of the county as isolated fragments of land.
- 1.6 The new Countryside Park would be created on intensive arable land of low biodiversity value and would result in a 18.7% increase in the extent of the calcareous grassland resource within the local area (Gog Magog Hills). This, together with development specific landscaping, would result in a measured biodiversity net gain of +234%.
- 1.7 The Countryside Park delivers on a significant number of biodiversity objectives set out in local and national biodiversity planning and strategy documents that I go on to discuss in more detail including:
- Cambridge Nature Network Report;
 - Greater Cambridge Green Infrastructure Opportunity Mapping;
 - Greater Cambridge Local Plan;
 - Cambridgeshire Green Infrastructure Strategy;
 - South Cambridgeshire district council Doubling Nature Strategy;
 - Cambridge Southern Fringe Area Action Plan;
 - National Planning Policy Framework; and
 - South Cambridgeshire Local Plan.
- 1.8 Much of the science behind local biodiversity strategy planning is based on ecological principals set out by Sir John Lawton in 2010. The Lawton report (see CD5.17) aimed to review how England's wildlife and ecological network of wildlife sites could be improved to help nature thrive in the face of anthropogenic pressure such as climate change. The report recommended that England's wildlife sites needed to be bigger, better and more



joined up to allow their associated species to move to more suitable habitat conditions in the face of climate change (CD5.17, p70-72). Isolated nature reserves in landscapes fragmented by human activity such as intensive agriculture are susceptible to local species extinctions as their plant and animal species are effectively trapped with limited resources and no alternative habitat areas to colonise in response to unfavourable changing climatic conditions (CD5.17, section 2.2.1, p14 & section 5.3, p65-66).

- 1.9 Establishing a coherent and resilient ecological network will help wildlife cope with unfavourable anthropogenic change, and to do this England's existing network of wildlife sites need to be bigger, better and more joined up. This means:
- protecting and increasing the size of existing wildlife sites;
 - creating new wildlife sites; and
 - enhancing habitat connectivity between wildlife sites by creating new wildlife corridors or stepping-stones.
- 1.10 The proposed new Countryside Park will help deliver on the Lawton report recommendations by providing a significant new area (18.9 hectares) of chalk grassland habitat in a location of low biodiversity value where the prevailing geology and soils will facilitate chalk grassland establishment. The Countryside Park will increase the overall size of the chalk grassland resource in this part of Cambridge by 18.7% and will provide a stepping-stone habitat between other local chalk grassland wildlife sites, thereby helping to increase the resilience of the chalk grassland wildlife in this part of Cambridge. I also estimate, based on our counts of skylarks using the development site and Magog Down in June 2021, that the new Countryside Park will result in 60% more breeding skylarks over the site compared with current skylark breeding densities over the site as currently managed as arable land.
- 1.11 The new Countryside Park will be established and managed by the Magog Trust – the same organisation that established chalk grassland on former arable land at the nearby Magog Down site. The success of their work is reflected in the designation of Magog Down as a County Wildlife Site (CWS) because of its chalk grassland and other wildlife interest. A number of other statutory (SSSI) and non-statutory wildlife sites (CWS) that support



calcareous grassland also occur in the local area and will be better joined-up as a result of the Countryside Park proposal.

- 1.12 In my opinion, the Countryside Park proposal is of exceptional biodiversity value and far exceeds the “normal” biodiversity enhancement / net gain offering that would be required to support a development proposal. The biodiversity enhancement that would result from the Countryside Park is immense and highly relevant to planned biodiversity conservation objectives in the local area and should be given substantial planning weight.
- 1.13 The National Planning Policy Framework (NPPF) and the South Cambridge Local Plan both state that development whose primary objective is to conserve or enhance biodiversity should be supported. The Countryside Park proposal is such a development given the significant and relevant biodiversity benefit it will provide to the local area.

STATEMENT OF DUTIES TO INQUIRY

- 1.14 The evidence which I am presenting for this appeal has been prepared in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.



BACKGROUND

- 1.15 The development Site is located within the Gog Magog Hills area of Cambridgeshire in a landscape that has an underlying calcareous geology which supports plant communities of high nature conservation and wildlife value. Much of England's calcareous grassland was lost to the plough as a result of increasing food production following the advent of World War II. Nationally the cover of calcareous grassland has suffered a sharp decline in extent over the last 80 years, and Cambridgeshire has mirrored this trend over the same time period with only around 101 ha of chalk grassland thought to remain in the Gog Magog Hills area of the county as isolated fragments of land.
- 1.16 A number of wildlife sites that support chalk grassland habitats occur within close proximity to the site including those with statutory and non-statutory wildlife protection. These include the **Gog Magog Golf Course Site of Special Scientific Interest (SSSI)** and the **Roman Road SSSI** located 1.0 and 2.2 km to the north-east respectively, and the **Magog Down and Stapleford Pit County Wildlife Site (CWS)** and **Wandlebury CWS** located 380 m and 1.1 km to the north-east respectively.
- 1.17 Calcareous grasslands in Cambridgeshire support a very rich flora including many nationally rare and scarce species such as lizard orchid *Himantoglossum hircinum*, moon carrot *Seseli libanotis*, pasque flower *Pulsatilla vulgaris*, perennial flax *Linum perenne ssp anglicum*; spotted cat's-ear *Hypochaeris maculata*, and bryophytes such as *Tortula vahliana*, *Tortula inflexa*, *Aloina brevirostris* and *Lophozia perssonii*. The invertebrate fauna of calcareous grassland is also diverse and includes scarce species including stripe-winged grasshopper *Stenobothrus lineatus*, chalkhill blue *Lysandra coridon*, small blue *Cupido minimus* and marbled white *Melanargia galathea* butterflies. Calcareous grasslands can also provide feeding or breeding habitat for declining birds such as skylark and stone curlew, and may also be used by bats and reptiles.
- 1.18 The ecology assessment that supported the planning application for the development was completed in 2020 and confirmed that the site was comprised of intensively managed arable land of low habitat and wildlife value, and that the Countryside Park proposal would deliver a significant biodiversity net gain. The findings and conclusions of the 2020 report are not disputed by the planning authority.



- 1.19 Applied Ecology Ltd re-surveyed the Site, its adjoining arable land (site of the proposed Countryside Park) and grassland within the Magog Down in June 2021. This was completed to inform a Biodiversity Net Gain assessment using Natural England’s Biodiversity Metric 3.0 calculation tool and assess the breeding densities of skylark in the three land areas. Biodiversity Metric 3.0 is a habitat-based approach used to assess an area’s value to wildlife and can be used to calculate biodiversity losses and gains for terrestrial and/or intertidal habitats. The metric will underpin the Environment Bill’s provisions for mandatory biodiversity net gain in England.
- 1.20 The development will facilitate a highly significant positive biodiversity enhancement through new landscaping and the creation of a new Countryside Park. In Biodiversity Net Gain (BNG) terms, the new landscape will result in a BNG of +234% in a location that has been identified specifically by local biodiversity planning initiatives and emerging biodiversity and green infrastructure planning policy as a strategic location for chalk habitat creation and management. See **Appendix B** for a summary of the BNG calculation.
- 1.21 The new Countryside Park will be established and managed by the Magog Trust – the same organisation that established chalk grassland on former arable land at the nearby Magog Down site¹. The Magog Trust has effectively balanced the needs of nature conservation and recreation within the Site and the success of this work is reflected in the designation of Magog Down as a County Wildlife Site (CWS) called the **Magog Down and Stapleford Pit CWS** – designated because of its chalk and other wildlife interest. The **Magog Down and Stapleford Pit CWS** is located 390 metres to the north-east of the proposed Countryside Park and supports species rich chalk grassland of high quality and a range of characteristic chalk species including rare and scarce plants and other wildlife. See **Appendix C** for example photographs of Magog Down.
- 1.22 It is likely that the Magog Trust will use green hay cut from **Magog Down and Stapleford Pit CWS** to help establish grassland within the new Countryside Park and, once established, there is likely to be a natural exchange of wildlife between the two areas given their close proximity, most notably flying insects and birds and the wind-blown seeds of plants.

¹ http://www.magogtrust.org.uk/about/magog_down/



LOCAL BIODIVERSITY STRATEGIES & PLANNING POLICIES

- 1.23 The proposed Countryside Park will facilitate a highly significant biodiversity enhancement in a location where local biodiversity and emerging green infrastructure planning policy has identified a strategic need for ecological enhancement of the type that is being proposed.
- 1.24 Much of the science behind local biodiversity strategy planning is based on ecological principals set out by Sir John Lawton in 2010² (see CD5.17). The Lawton report aimed to review how England's ecological network of wildlife sites could be improved to help nature thrive in the face of climate change and other pressures. The report recommended that England's existing network of wildlife sites needed to be bigger, better and more joined up to enable species, and their genes, to move (CD5.17, p70-72). Isolated nature reserves in landscapes fragmented by human activity such as intensive agriculture are susceptible to local species extinctions as their plant and animal species are effectively trapped with limited resources and no alternative habitat areas to colonise in response to unfavourable changing climatic conditions (CD5.17, section 2.2.1, p14 & section 5.3, p65-66).
- 1.25 Establishing a coherent and resilient ecological network will help wildlife cope with anthropogenic change and to do this the existing network of wildlife sites need to be bigger, better and more joined up. This means:
- protecting and increasing the size of existing wildlife sites;
 - creating new wildlife sites; and
 - enhancing habitat connectivity between wildlife sites by creating new wildlife corridors or stepping-stones.
- 1.26 The proposed new Countryside Park will help deliver on the Lawton report objectives by providing a significant new area (18.9 hectares) of chalk grassland habitat in a location where the prevailing geology and soils will facilitate chalk grassland establishment thereby increasing the overall size of the chalk grassland resource in this part of Cambridge by 18.7% (see para 1.29 below). Like the **Magog Down and Stapleford Pit CWS** that was established on former arable land, the new Countryside Park is highly likely to develop significant wildlife interest over time and will provide a chalk grassland stepping-stone that

² Lawton, J. H. et al (2010) *Making Space for Nature a review of England's wildlife sites and ecological networks*. Report to Defra.



will help better connect the existing chalk grassland habitats of the **Magog Down and Stapleford Pit CWS, Wandlebury CWS** and the **Gog Magog Golf Course SSSI and Roman Road SSSI** thereby increasing the resilience of these sites. Currently the site of the Countryside Park is managed as intensive arable land and has low biodiversity and nature conservation value.

CAMBRIDGE NATURE NETWORK REPORT

- 1.27 The proposed Countryside Park is located within the Gog Magog Hills Priority Nature Network Area as identified by the Cambridge Nature Network report published in March 2021³ (see CD5.13).
- 1.28 The Gog Magog Hills Network Area is important for its chalk grassland habitat with a reported total area of 101 ha of chalk grassland habitat present within the 2,666 ha of land within the Network Area. The Cambridge Nature Network report concludes (CD5.13, p32) that chalk grassland creation within the Network Area is required to increase the resilience of existing chalk grassland habitat and states *“The conclusion is a significantly increased area of chalk grassland is required in larger patches to support the remaining fragments of calcareous grassland and the full range of associated habitats and species”*. This is based on the Lawton report principles that bigger and better-connected habitats help increase the resilience of existing habitats.
- 1.29 It is of note that the Countryside Park proposal represents the conversion of 18.9 hectares of arable land to permanent grassland and will result in a 18.7% increase in the extent of chalk grassland habitat across the entire Gog Magog Hills Priority Nature Network Area - a highly significant biodiversity benefit that will generate a Biodiversity Net Gain (BNG) uplift of +234% according to the current Biodiversity Metric 3.0 calculation tool. It is of note that the BNG calculation has included the loss of land that would result from the Cambridge South East Transport (CSET) project route within the site.
- 1.30 Not only will the new grassland increase the extent of chalk grassland locally and deliver a highly significant BNG uplift, but it will also provide strategic benefits that are not measured by the Metric, including providing connections between core chalk grassland areas of

³ The Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire (March 2021) *The Cambridge Nature Network – A Nature Recovery Network for Cambridge and its Surrounds – Final Report*.



Magog Down and Stapleford Pit CWS, Wandlebury CWS and the Gog Magog Golf Course SSSI and Roman Road SSSI with Nine Wells Local Nature Reserve (LNR) and Hobson's Park and Hobson's Brook to the north-west – helping to increase the resilience of a number of important local nature conservation sites.

GREATER CAMBRIDGE GREEN INFRASTRUCTURE OPPORTUNITY MAPPING

1.31 The Greater Cambridge Green Infrastructure Opportunity Mapping report, published in September 2021 (CD5.11), was produced to inform the forthcoming joint South Cambridgeshire District Council and Cambridge City Council Greater Cambridge Local Plan and confirms that the proposed Countryside Park falls within a Strategic Initiative area 3: Gog Magog Hills and chalkland fringe (see CD5.11, p10). Within this area three objectives are identified (CD5.11, p64):

- *Conserve and enhance priority habitats, including chalk grassland and woodland;*
- *Provide a high quality, connected Green Infrastructure network to accommodate growing recreational need and enable residents to access, enjoy and learn about this part of Greater Cambridge's countryside;*
- *Ensure access to the countryside is managed in a way which avoids increasing recreational pressure on existing conservation sites at risk (e.g. SSSIs).*

1.32 The proposed Countryside Park will meet these three objectives by helping conserve and enhance chalk grassland habitats in the local area by providing 18.9 hectares of new chalk grassland habitat that will be managed in perpetuity as chalk grassland. The Countryside Park will provide an area for low key recreational activity for local residents and alternative recreational space to the Roman Road SSSI where the chalk grassland is susceptible to damage from users of the bridleway that runs through the centre of this SSSI. Make clear recreation not affect the benefit.

GREATER CAMBRIDGE LOCAL PLAN

1.33 The first proposals of the forthcoming Greater Cambridge Local Plan are currently out for consultation but include specific policies for green infrastructure and biodiversity. The green infrastructure policy specifically identifies the Gog Magog Hills and chalkland fringe area, within which the proposed Countryside Park is located, as a Strategic Initiative Area 3. This requires all development proposals – appropriate to its type, scale and location - to



include green infrastructure, providing the following varied benefits for people, wildlife and planet (see **Appendix D**):

- *Reinforcing and enhancing landscape and townscape, ensuring that proposed green infrastructure is appropriate to its local context;*
- *Supporting delivery of biodiversity net gain, including by providing links between habitats within and beyond the site boundary, and connecting where appropriate to the wider ecological network (see below), whilst carefully balancing the needs of wildlife and people;*
- *Promoting healthy living for all members of the community by providing spaces designed to be physically accessible and socially inclusive;*
- *Protecting and enhancing the water environment;*
- *Enhancing access and connectivity;*
- *Providing environmental enhancement;*
- *Supporting climate mitigation and adaptation.*

1.34 The Countryside Park will help to realise all of the above benefits by providing green infrastructure within the Gog Magog and chalkland fringe that should realise a biodiversity net gain of +234% (a significant biodiversity enhancement). As a secondary benefit, the Countryside Park will provide new socially inclusive recreational space for the local community that will have enhanced footpath connectivity to existing local recreation areas. The change of land use from intensive arable agriculture to a chalk grassland will also help protect and enhance the local water environment by completely removing the application of agrochemicals from the area that may otherwise pollute local ground and surface waters. Finally, and as highlighted previously, the creation of 18.9 hectares of new chalk grassland habitat located in close proximity to existing chalk grassland wildlife sites will help increase the resilience of the overall chalk grassland resource to anthropogenic changes, relating to recreational use and climate change, for instance.

1.35 To support successful delivery of green infrastructure, the policy will also require proposals to demonstrate that green infrastructure has been planned (see **Appendix D**):

- *as an integral part of the development, so that it informs the overall development design, and so that natural features are retained in situ;*



- *across all phases of development;*
- *to be successful for the lifetime of the development, including providing plans for management, maintenance and funding.*

1.36 As highlighted previously, the Countryside Park has been carefully planned and will be managed in perpetuity by an organisation that has a proven track record in the successful creation and management of a chalk grassland countryside park in the local area.

1.37 The biodiversity policy in the forthcoming Greater Cambridge Local Plan (see **Appendix E**) will control the biodiversity impacts from development, including the approach to biodiversity net gain (BNG). This requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were in before and will require development to achieve a minimum 20% BNG as measured by the current Defra (Natural England) biodiversity metric 3.0 calculation tool.

1.38 As outlined before, the development would result in a +234% increase in biodiversity as measured by the biodiversity metric 3.0 calculation tool and is a highly significant primary benefit.

CAMBRIDGESHIRE GREEN INFRASTRUCTURE STRATEGY

1.39 The Cambridgeshire Green Infrastructure Strategy report published by the Cambridgeshire Green Infrastructure Forum⁴ in June 2011 (CD5.2) identifies a “strategic network” of green infrastructure priorities for Cambridgeshire upon which green infrastructure can be provided or enhanced up to and beyond 2031. It sets out how green infrastructure can achieve four objectives (CD5.2, p29-30):

- *to reverse the decline in biodiversity;*
- *to mitigate and adapt to climate change;*
- *to promote sustainable growth and economic development; and*
- *to support healthy living and well-being.*

⁴ Made up of 25 statutory and non-statutory organisations including: Cambridge City Council, Cambridgeshire County Council, East Cambridgeshire County Council, South Cambridgeshire District Council; Huntingdonshire District Council; and Fenland District Council.



- 1.40 It identifies Cambridge city and surrounding accessible green spaces as a target area and specifically refers to opportunities for enhanced management of and linkages on the city fringes including the Gog Magog Downs. The report goes onto state that “*Areas of calcareous grassland have become fragmented and need to be expanded and linked together in order to produce sustainable blocks of habitat*” (CD5.2, p140).
- 1.41 The proposed Countryside Park would result in the conversion of 18.9 hectares of arable land to permanent grassland that will represents a 18.7% increase in the existing chalk grassland habitat resource across the entire Gog Magog Hills Priority Nature Network Area - a highly significant biodiversity benefit that meets the Cambridgeshire Green Infrastructure Strategy target for chalk grassland.

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL DOUBLING NATURE STRATEGY

- 1.42 South Cambridgeshire District Council’s (SCDC) Doubling Nature Strategy report was published in February 2021 (CD5.1) and sets out a vision to double nature in South Cambridgeshire by 2050 and specifically to provide “*more wildlife-rich habitats; an increase in tree canopy cover; and better accessibility to green space*”. It specifically recognises the decline of “*key habitats such as semi-natural grassland in Cambridgeshire*” (CD5.1, p4), and specifically chalk grassland (CD5.1, p8).
- 1.43 The Doubling Nature Strategy was published in part response to a motion put forward and carried in a SCDC council meeting (18 July 2019 – see **Appendix A**) that declared an ecological emergency within the SCDC administrative area, recognising that Cambridgeshire has seen an unprecedented decline in biodiversity as a result of anthropogenic activity.
- 1.44 The Countryside Park will represent a significant increase in wildlife-rich habitats, increase tree canopy cover and will increase access to green space in the local area.
- 1.45 I am unaware of any specific large scale chalk grassland projects that have been delivered under the Doubling Nature Strategy, but from my own experience as an ecological consultant it is clear that the Countryside Park will not only deliver a highly significant positive biodiversity net gain in metric assessment terms, but will provide a significant area of a habitat type that has suffered significant historic loss and fragmentation in a location where ecological planning strategy reports have identified a specific need for chalk grassland creation.



CAMBRIDGE SOUTHERN FRINGE AREA ACTION PLAN

1.46 The site is located within the Land south of Addenbrokes Countryside Enhancement Strategy area as identified by the Cambridge Southern Fringe Area Action Plan that was adopted by South Cambridgeshire District Council in February 2008 (CD4.2). The strategy is reported to comprise new landscape creation and planting as follows (CD4.2, p21-22):

- 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; and*
- m. New footpaths, cyclepaths and bridleways creating routes through the area and lining Wandlebury Country Park / The Magog Down.*

1.47 The proposed Countryside Park will provide a new landscape that will contribute to seven of eight deliverables listed above. I am unaware of any project that has delivered chalk grassland in the Addenbrokes Countryside Enhancement Strategy area, and the creation of 18.9 hectares of this habitat type will provide a significant boost to this objective.

NATIONAL PLANNING POLICY FRAMEWORK

1.48 The National Planning Policy Framework (NPPF) was published in March 2012 (CD5.14) and replaced previous planning policy guidance (PPS 9) on biodiversity. The NPPF was updated in July 2018, February 2019, and in July 2021, and states the following in relation to biodiversity and planning at paragraph 180 (CD5.14, p52):

“When determining planning applications, local planning authorities should apply the following principles:

- if significant harm to biodiversity 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 should be refused;*



- *development on land within or outside a Site of 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 Sites of Special Scientific Interest;*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *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.*

The following should be given the same protection as habitats sites:

- *potential Special Protection Areas and possible Special Areas of Conservation;*
- *listed or proposed Ramsar sites; and*
- *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.*

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

1.49 The primary objective and outcome of the proposed Countryside Park is to deliver a significant biodiversity enhancement and, in line with the NPPF guidance on biodiversity, it is a “*development whose primary objective is to conserve or enhance biodiversity*”. On this basis, and reflecting the highly significant biodiversity outcome that would result from the Countryside Park the development should be supported in my opinion.



POLICY NH/4: BIODIVERSITY

1.50 The South Cambridge Local Plan (CD4.1) has a specific policy for biodiversity (Policy NH/4) that states the following (CD4.1, p115-116):

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 Species or Priority Habitat⁵ 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*

⁵ Priority Species and Habitats are those that are identified within a Biodiversity Action Plan (BAP) and / or the Natural Environment and Rural Communities Act, 2006, Section 41.



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.*
7. *Climate change poses a serious threat to biodiversity and initiatives to reduce its impact need to be considered.*

1.51 The primary objective and outcome of the proposed Countryside Park is to deliver a significant biodiversity enhancement and, in line with the South Cambridge Local Plan policy on biodiversity, it is a “*development proposal where the primary objective is to conserve or enhance biodiversity*”. Reflecting the highly significant biodiversity outcome that would result from the Countryside Park, the development would be in accordance with the development plan.



Appendix A



Appendix B



Appendix C



Appendix D



Appendix E

