



South Cambridgeshire Local Development Framework

**Biodiversity  
Listed Buildings:  
Works to or affecting the setting of  
Supplementary Planning Documents**

**Statement of Consultation**

**July 2009**

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## 1. INTRODUCTION

- 1.1 This statement has been developed to provide information relating to how the representations received to the following Supplementary Plan Documents (SPD) have been considered in accordance with Town & Country Planning (Local Development) (England) Regulations 2004 - Regulation 18(4):
- Biodiversity
  - Listed Buildings: Works to or affecting the setting of
- 1.2 The SPDs have also been subject to Sustainability Appraisal. The Sustainability Appraisal and Strategic Environmental Assessment (SA / SEA) has been undertaken in parallel with the preparation of the SPDs, so that sustainability considerations have been identified at an early stage and reflected in their content.
- 1.3 A Sustainability Appraisal Scoping Report Addendum has been prepared for the Listed Buildings SPD, and subject to consultation with statutory bodies (English Heritage, Environment Agency and Natural England). The Addendum forms part of the South Cambridgeshire Sustainability Appraisal Scoping Report (January 2006), and provides a framework for the Sustainability Appraisal. A Scoping Report Addendum was not produced for the Biodiversity SPD as it was felt the existing Sustainability Appraisal Scoping Report was sufficiently detailed to cover it; the statutory bodies did not disagree with this approach.
- 1.4 The preparation of the SPDs has been subject to public participation in accordance with Regulation 17.
- 1.5 This statement sets out the following information for the public consultation:
- A summary of the main issues raised in representations received during the public consultation; and
  - How these issues have been addressed in the SPDs.

## 2. CONSULTATION OVERVIEW

- 2.1 A six-week period of public consultation on the SPDs and their associated Sustainability Appraisals took place between 27 February and 14 April 2009. The Council set up an interactive website to assist access to the documents and to facilitate making responses online.
- 2.2 A total of 155 representations were received on the SPDs. No representations were received to the Sustainability Appraisals. The breakdown of these representations is shown in the table below.

### **Breakdown of representations received to the SPDs:**

<b>SPD Support</b>		<b>Object</b>	<b>Total</b>
Biodiversity	5	111	116
Listed Buildings	8	31	39

### **Summary of the main issues raised to the Biodiversity SPD:**

- Suggested text be amended slightly to reflect rather than repeat the requirements of PPS9
- Seeking clarification of the differences between the SPD and Biodiversity Strategy and their relationship as council documents
- Suggested clearer links to further information relating to protected species
- Suggested refinement of when Priority Species Survey and Assessment is required for clarity
- Suggested amendments to Tables 1 & 2
- Suggested refinement of the development guidelines
- Suggested refinement of the set of Biodiversity Issues, particularly:
  - Biodiversity Issue 3 (mitigation and compensation)
  - How biodiversity gain is to be achieved
  - Ensuring that the expectation placed upon applicants is not unreasonable
  - Clarification of Priority Species, Priority Habitats and Protected Species issues
  - Ensuring that Biodiversity Issues are not confused with, or repeat, policy
- Suggested refinement of the text relating to the registration process
- Suggested refinement of the “triggers” for Site Assessment and Survey
- Need for more focus on biodiversity benefits of SUDS
- Need to bring forward the Countryside Enhancement Area and Wildlife Corridor map from the Biodiversity Strategy

### **Summary of the main issues raised to the Listed Buildings SPD:**

- Seeking confirmation that the previously adopted Thatching Guide would form part of the Listed Buildings SPD
- Concern over the impacts of works on biodiversity including habitats for protected species such as bats and owls
- Suggested improvements on consultation, distribution and updating of the document
- Questions about the overall purpose, intended audience, tone, structure and degree of detail
- Concern about the relationship to national law, policy and guidance and whether the SPD has to reflect these

**How these issues have been addressed:**

- 2.3 The following schedules for each SPD provide a summary all of the representations received in plan order together with any suggested change to the text of the SPD, the Council's assessment of them and, where appropriate, proposes amendments to the text of the draft SPDs.
- 2.4 There are no amendments proposed to the Sustainability Appraisals, as the changes to the SPDs are relatively minor, in the main providing further detail or clarification rather than altering the policy approach.
- 2.5 The proposed changes to the SPDs and their impact on sustainability have been considered by the Council at a meeting of Cabinet on 2 July 2009 as part of the process of formally adopting the revised SPDs.

# Biodiversity Supplementary Planning Document

## Public Participation Report

Chapter 1 Introduction to the Supplementary Planning Document

1.1

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
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### *Chapter 1 Introduction to the Supplementary Planning Document*

#### *1.1*

23395 - Natural England (Ms Janet Nuttall) [6952]	Support	Natural England supports your authority's objective to seek to ensure that biodiversity is adequately protected and enhanced through the planning process and generally welcomes the policies proposed in this SPD.		Support noted.	No change.
23294 - The Wildlife Trust (Miss Sian Williams) [8651]	Support	The Wildlife Trust supports the inclusion of this document within the South Cambridgeshire Local Development Framework. We agree with the ideas and guidelines set out within the document. We are pleased to see that the importance of incorporating biodiversity conservation and enhancements within development and the planning process is being recognised.		Support noted.	No change.
23283 - Guilden Morden Parish Council (Mrs Gail Stoehr) [1145]	Support	Guilden Morden Parish Council accepts the Biodiversity SPD as presented.		Support noted.	No change.
23295 - Anglian Water Services Limited (Mick Galey) [10127]	Support	Fully support document, no comments to make.		Support noted.	No change.
23419 - Foxton Parish Council (Mrs Joan Burns) [1877]	Support	Foxton PC supports the Biodiversity SPD.		Support noted.	No change.

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<i>1.4</i>					
23409 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	PPS9 suggests 'enhancing' biodiversity, your emphasis seems to be on conservation, by including enhancement this gives more scope for proactive measures rather than just protecting what is there.		Biodiversity issue B1 states, "Secure the protection, enhancement and management of natural and semi-natural landscapes and habitats together with the biodiversity that they contain, and to seek the restoration or creation of new habitats." The wording of this issue is considered adequate to enable the LPA to be "proactive" as the Respondent requests.	No change.
<i>1.5</i>					
23320 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	The definition of biodiversity should be improved so it clearly indicates that it covers species and habitats, both rare and common and genetic diversity. This will help set the scene as to what the SPD is hoping to protect and enhance.		Comment accepted.	Amend paragraph 1.5, first sentence to read, "Biodiversity is a term used to describe the richness of the living environment around us it incorporates all species and habitats, both rare and common, and strives to ensure the protection of genetic diversity."
<i>1.6</i>					
23410 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	Principle 5 in PPS9 is to permit schemes where the principle objective is to conserve or enhance biodiversity not just to contribute.		Comment accepted. SPD should be amended to reflect PPS9.	Amend paragraph 1.6, part 5 to read, "The encouragement to support development schemes that conserve or enhance local biodiversity."
<i>1.8</i>					
23390 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Biodiversity Strategy - it must be made much more clear that SCDC's Biodiversity Strategy 2006 is still a document of material consideration not just in the next few years but throughout the lifetime of this LDF and its Biodiversity SPD.		Paragraph 1.8 states, "SCDC has already produced its Biodiversity Strategy and has adopted it as council policy, September 2006." However, additional text could be inserted for clarity.	Amend paragraph 1.8 so that it reads "The Biodiversity Strategy is due for review and will continue to act as a guiding document for SCDC's general approach to biodiversity conservation across its range of functions. The Strategy will act in parallel to the SPD."

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<i>1.10</i>					
23321 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	Another objective should be to help ensure that no environmental legislation is breached. The SPD needs to be clear that some species have legal protection and require particular consideration. At the moment this is only lightly touched upon.		Comment noted. Appendices 2 and 4 draw attention to the legislative framework providing species' protection and provide web links. It is not the intention of the SPD to try a detail the range of species, habitats and their protection.	No change proposed.
<i>1.12</i>					
23306 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	The introduction of this SPD effectively results in 3 tiers of policy and guidelines for biodiversity in the District. Having these 3 tiers is potentially very confusing. Clearly the greatest weight is accorded to the DPDs. The Biodiversity Strategy must be accorded the least weight as it is not a Local Development Document. Any appropriate and relevant guidelines in the Strategy that are consistent with the aims and purposes of SPDs should be imported into this SPD. In all circumstances, the lower status and weight to be accorded to the Council's Biodiversity Strategy must be made clearer in this SPD.	Amend paragraph 1.12 as follows: "... in the Biodiversity Strategy. The Strategy is not a Local Development Document (LDD) and does not carry the same weight as LDDs. This SPD in addition to the Development Plan Documents provides such guidance."	Comment accepted. Further clarification should be given in the form of revised text. The text of paragraph 1.12 should be re-worded.	Amended paragraph 1.12 so that it reads, "The supporting text of the Development Control Policies Policy NE/6 states that further guidance on Priority Species and Habitats, sites and the achievement of biodiversity targets shall be set in the Biodiversity Strategy. The Biodiversity Strategy was produced in 2006 and adopted as Council policy. It provided guidance in the interim period to the production of this Biodiversity SPD. This SPD now incorporates those matters from the Biodiversity Strategy that relate to the planning process and provides guidance to support the policies in the LDF. The Biodiversity Strategy will subsequently be reviewed to provide a wider strategy for the conservation of the district's biodiversity, and will be adopted as Council policy."

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23344 - Homes and Communities Agency (Mr Mark White) [2347]	Object	The introduction of this SPD effectively results in 3 tiers of policy and guidelines for biodiversity in the District. Having these 3 tiers is potentially very confusing. Clearly the greatest weight is accorded to the DPDs. The Biodiversity Strategy must be accorded the least weight as it is not a Local Development Document. Any appropriate and relevant guidelines in the Strategy that are consistent with the aims and purposes of SPDs should be imported into this SPD. In all circumstances, the lower status and weight to be accorded to the Council's Biodiversity Strategy must be made clearer in this SPD.	Amend paragraph 1.12 as follows: "... in the Biodiversity Strategy. The Strategy is not a Local Development Document (LDD) and does not carry the same weight as LDDs. This SPD in addition to the Development Plan Documents provides such guidance."	Point accepted. Further clarification should be given in the form of revised text. The text of paragraph 1.12 should be re-worded.	Amend paragraph 1.12 so that it reads, "The supporting text of the Development Control Policies Policy NE/6 states that further guidance on Priority Species and Habitats, sites and the achievement of biodiversity targets shall be set in the Biodiversity Strategy. The Biodiversity Strategy was produced in 2006 and adopted as Council policy. It provided guidance in the interim period to the production of this Biodiversity SPD. This SPD now incorporates those matters from the Biodiversity Strategy that relate to the planning process and provides guidance to support the policies in the LDF. The Biodiversity Strategy will subsequently be reviewed to provide a wider strategy for the conservation of the district's biodiversity, and will be adopted as Council policy."
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<i>1.13</i> 23411 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	Not exactly sure what is meant by 'not to permit proposals where there will be an unacceptable impact on the countryside, landscape character and biodiversity'. How will these be judged?		Comment noted. Sometime an impact will be allowed due to other gains that it may provide (such as economic). Such applications will be judged on a case-by-case basis as they occur.	No change proposed.

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## *Chapter 2 Biodiversity Conservation*

### *2.6*

23322 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	The biodiversity action plans have been recently revised. It is therefore suggested that a link is added to where they can be viewed which is as follows: <a href="http://www.cambridgeshire.gov.uk/biodiversitypartnership">www.cambridgeshire.gov.uk/biodiversitypartnership</a>		Comment noted.	Replace web link in paragraph 2.2, <a href="http://www.cambridgeshire.gov.uk/sub/cntry side/biodiv">www.cambridgeshire.gov.uk/sub/cntry side/biodiv</a> to <a href="http://www.cambridgeshire.gov.uk/biodiversitypartnership">www.cambridgeshire.gov.uk/biodiversitypartnership</a>
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### *2.12*

23363 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Proposed new paragraph 2.13 - a full reference should also be made to climate change issues and impact on local wildlife (floral and faunal etc) and clear commitment to more proactive work to protect, enhance etc the local biodiversity when delivering developments or engendering other major site changes.		Comment noted. The purpose of this SPD is to provide specific guidance on biodiversity matters. Whilst climate change is acknowledged as serious impact to biodiversity it is not the place for this SPD to propose working commitments. The LDF, Natural Environment chapter considers the SCDC response to climate change through development. However, in order to draw attention to the issue a minor amendment could be made.	Insert a new paragraph after 2.12 as such, "Biodiversity conservation is intrinsically linked with climate change. Many species rely on the seasonal patterns of our stable climate. As weather patterns subtly change or storm events become more frequent then certain species may experience stresses on their populations. Where species cannot move in order to adjust to rainfall patterns or periods of extreme temperature then they may suffer local extinctions. Habitat fragmentation is a real threat to biodiversity. In order to address this pressure large-scale habitat creation may become increasingly important. At the local level, the choice of traditional planting may need to be re-considered in order to deliver new habitats for the future."
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### *Chapter 3 The Development Process*

#### *3.2*

23403 - Natural England (Ms Janet Nuttall) [6952]	Object	Do you define anywhere in the document what Priority Species are?		Priority Species and Habitats are defined in paragraph 2.2.	No change.
23353 - Homes and Communities Agency (Mr Mark White) [2347]	Object	The statement states that an applicant shall be expected to undertake a site survey however; this does not expressly imply that an applicant should or be required to undertake ecological and environmental surveys so should therefore be clearly stated. For example a topographic or hydrological survey will have little direct value in judging the biodiversity value of a site.	The first sentence should be changed to:  "Where the current level of biodiversity interest upon a site is unknown, and there are reasonable grounds to believe that the site may be used by a Priority Species, then an applicant shall be expected to undertake ecological and environmental surveys and assessments prior to the consideration of a development proposal."	Comment noted. Where biodiversity impact is the point in question one would assume that an applicant would focus site survey and assessment upon that issue. The text in paragraphs 3.3 leads on to this point and then it is clarified in paragraphs 3.6, 3.7 and so on by stating "Priority Species Survey and Assessment."	No proposed change.
23323 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	Add in text to highlight that a search for desk records for species from Cambridgeshire and Peterborough Biological Records Centre can provide valuable information to help determine the biodiversity value of land and identify further survey needs.		Comment accepted. Reference to the Cambridgeshire and Peterborough Biological Records Centre is provided in paragraph 3.8. Note proposed additional text provide in response to 23396 below.	No change.
23315 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	The statement states that an applicant shall be expected to undertake a site survey however; this does not expressly imply that an applicant should or be required to undertake ecological and environmental surveys so should therefore be clearly stated. For example a topographic or hydrological survey will have little direct value in judging the biodiversity value of a site.	The first sentence should be changed to:  "Where the current level of biodiversity interest upon a site is unknown, and there are reasonable grounds to believe that the site may be used by a Priority Species, then an applicant shall be expected to undertake ecological and environmental surveys and assessments prior to the consideration of a development proposal."	Comment noted. Where biodiversity impact is the point in question one would assume that an applicant would focus site survey and assessment upon that issue. The text in paragraphs 3.3 leads on to this point and then it is clarified in paragraphs 3.6, 3.7 and so on by stating "Priority Species Survey and Assessment."	No proposed change.

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3.5 23364 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	A Guideline 7 should be added: To improve management of biodiverse areas, their future ownership and clear management should be also specified beyond the initial 10 year of management.		Comment noted. No change considered necessary due to the point being raised in guideline 5. Management beyond ten years is not often achieved. The guidelines as presented are simply to raise the issue and do not preclude the negotiation of management beyond ten years where it is necessary.	No change.
23298 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	The Development Guidelines appear to be a series of very short headlines. They will require some interpretation and discussion with SCDC to understand the implications. This is presumably the reason why each statement has an associated 'example best practice approach'. Although this section of the SPD is useful and should be consistent with DPD policies, it is not comprehensive enough to be adhered to by every development proposal. The example best practice approach will not always be appropriate or relevant in every case.	The sentence prefacing the guidelines should be changed to "Development proposals should take into account the following development guidelines:"	Comment accepted. The Development Guidelines in paragraph 3.5 are examples to illustrate how an applicant might consider biodiversity conservation on a site. The use of the word "adhere" in the first sentence is possibly too strong.	At paragraph 3.5 replace "adhere" with "have regard".
23336 - Homes and Communities Agency (Mr Mark White) [2347]	Object	The Development Guidelines appear to be a series of very short headlines. They will require some interpretation and discussion with SCDC to understand the implications. This is presumably the reason why each statement has an associated 'example best practice approach'. Although this section of the SPD is useful and should be consistent with DPD policies, it is not comprehensive enough to be adhered to by every development proposal. The example best practice approach will not always be appropriate or relevant in every case.	The sentence prefacing the guidelines should be changed to "Development proposals should take into account the following development guidelines:"	Comment accepted. The Development Guidelines in paragraph 3.5 are examples to illustrate how an applicant might consider biodiversity conservation on a site. The use of the word "adhere" in the first sentence is possibly too strong.	At paragraph 3.5 replace "adhere" with "have regard".

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23396 - Natural England (Ms Janet Nuttall) [6952]	Object	Guideline 1: Might suggest an initial desk study, incorporating a data search through the local BRC, and backed up by an extended Phase 1 Habitat Survey where appropriate. This will inform the requirement for, and scope of, further surveys. We note that a data search through the local BRC is mentioned in paragraph 3.8.		Comment accepted.	After 3.5 include additional text in Guideline 1 text box, "Desk based data searches may also be made through the Biological Records Centre."
23346 - Homes and Communities Agency (Mr Mark White) [2347]	Object	Guideline 5: It is not always possible to predict the requirement for, or the extent or scale of compensatory habitat. There is potential for such requirements to impact on the overall delivery of a scheme. The Development Principles Policies DP/1, DP/2 and DP/3 for example refer to the location, scale, form and nature of development proposals, confirming that wider issues should be taken into consideration.	Amend the wording of guideline 5 as follows: "... should ultimately aim to provide an overall biodiversity gain wherever practicable and realistic and subject to the economic viability of the development scheme."	Comment noted. The guidelines are for guidance rather than strict adherence. However, to ensure that a degree of compensation requirements are not too high Guideline 5 should have additional text added.	After paragraph 3.5, amend Guideline 5 so that it reads, "Where an impact is unavoidable and mitigation alone cannot adequately protect a species or habitat then the provision of compensatory habitat will be expected whilst being proportional to the development scheme".
23308 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	Guideline 5: It is not always possible to predict the requirement for, or the extent or scale of compensatory habitat. There is potential for such requirements to impact on the overall delivery of a scheme. The Development Principles Policies DP/1, DP/2 and DP/3 for example refer to the location, scale, form and nature of development proposals, confirming that wider issues should be taken into consideration.	Amend the wording of guideline 5 as follows: "... should ultimately aim to provide an overall biodiversity gain wherever practicable and realistic and subject to the economic viability of the development scheme."	Comment noted. The guidelines are for guidance rather than strict adherence. However, to ensure that a degree of compensation requirements are not too high Guideline 5 should have additional text added.	After paragraph 3.5, amend Guideline 5 so that it reads, "Where an impact is unavoidable and mitigation alone cannot adequately protect a species or habitat then the provision of compensatory habitat will be expected whilst being proportional to the development scheme".

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
3.6					
23404 - Natural England (Ms Janet Nuttall) [6952]	Object	We would expect to see some sort of ecological info presented when a site ticks a box in the 1App checklist but it is unreasonable to request a full species survey for the relevant species, because quite often it will turn out that there isn't anything present. It is therefore better to say that advice will be required from a qualified ecologist and most likely that an Ecological Scoping Survey will need to be undertaken to determine the actual interest of the site and inform any further survey requirements as necessary. This might be what you mean by Priority Species Survey and Assessment, but if so it isn't clear.		Comment noted. Table 1 details the type of development that would trigger the need for relevant species survey and assessment. Paragraph 3.7 states that the survey should be undertaken by competent person, and draws attention to the fact that exceptions for the requirements of a survey can be considered. If this is felt to be the case the scope of such survey can be discussed with the LPA in advance of the survey. Paragraph 3.13 details the exceptions for when a full Priority Species Survey and Assessment may not be required.	No change.
23398 - Natural England (Ms Janet Nuttall) [6952]	Object	Paragraphs 3.6 - 3.19: It may be more appropriate to discuss the need for species and habitat surveys together - since the requirement for both will be identified through the desk-study (incorporating BRC data search) and the ecological scoping survey (extended Phase 1 Habitat Survey). An application may involve a number of the proposals/features identified in Table 1, however, an appropriate desk-study and survey carried out by a suitably qualified ecologist should be able to determine the requirement for detailed Priority Species/Habitats surveys - and therefore screen out the need for additional survey work in many cases. This should eliminate the need for a Priority Species survey in every case where any of the features listed in Table 1 occur.		Comment noted. The reasoning for keeping the Priority Species and Biodiversity Site Survey and Assessment requires separate was to ensure compliance with the emerging guidance being produced by the Association of Local Government Ecologists (it is felt that this guidance may eventually become national guidance). Also by keeping the two issues separate the relevant guide tables are kept shorter and simpler, thus being more user friendly.	No change.

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<b>3.12</b>					
23309 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	It will not always be necessary or appropriate to return unregistered planning applications to applicants. If there are unresolved matters in relation to the necessary level of biodiversity information, the local planning authority can request the applicant to submit further information before the application is determined.	"Applications that do not contain the necessary level of biodiversity without justification, may not be registered by the District Council and will be returned to the applicant undetermined."	Comments accepted. It is accepted that further biodiversity information may be sought rather than returning unregistered applications. Following discussion with the Registration Team the text should be amended to accommodate the above comments.	Amend the first paragraph at 3.12 is proposed to read as such, "Applications that do not contain the necessary level of biodiversity information may not be validated by the District Council, and may be returned to the applicant undetermined or further information will be requested."
23324 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	'Applications that do not contain the necessary level of biodiversity information will not be registered by the District Council and will be returned to the applicant undetermined'.  It is suggested that this sentence should be amended to refer to the validation process given that the application will not be "validated" due to the lack of information provided.		Comments accepted. It is accepted that further biodiversity information may be sought rather than returning unregistered applications. Following discussion with the Registration Team the text should be amended to accommodate the above comments.	Amend the first paragraph at 3.12 is proposed to read as such, "Applications that do not contain the necessary level of biodiversity information may not be validated by the District Council, and may be returned to the applicant undetermined or further information will be requested."
23347 - Homes and Communities Agency (Mr Mark White) [2347]	Object	It will not always be necessary or appropriate to return unregistered planning applications to applicants. If there are unresolved matters in relation to the necessary level of biodiversity information, the local planning authority can request the applicant to submit further information before the application is determined.	"Applications that do not contain the necessary level of biodiversity without justification, may not be registered by the District Council and will be returned to the applicant undetermined."	Comments accepted. It is accepted that further biodiversity information may be sought rather than returning unregistered applications. Following discussion with the Registration Team the text should be amended to accommodate the above comments.	Amend the first paragraph at 3.12 is proposed to read as such, "Applications that do not contain the necessary level of biodiversity information may not be validated by the District Council, and may be returned to the applicant undetermined or further information will be requested."

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<i>Table 1</i>					
23399 - Natural England (Ms Janet Nuttall) [6952]	Object	Additional proposals/features could include: 'trees with substantial ivy cover for breeding birds/bats' and 'wood/rubble/compost/manure/woodchip/s awdust heaps for reptiles'. We would suggest that the aquatic habitats section should make specific reference to ditches as they are Priority Habitat potentially supporting Priority Species.		Comments accepted. The text of Table 1 should be amended to incorporate a greater variety of habitat relevant to the district. It is not considered a planning control matter to detail issues relating to wood/rubble/compost/manure/woodchip/s awdust heaps specifically.	In Table 1, in the with the box "proposed tree work" include a new bullet point of, "trees with substantial ivy cover" with bullet point against bats and breeding birds. The box detailing aquatic habitats should be amended to include "ditches" so that it reads, "Proposals affecting or within 25m* of rivers, streams, ditches lakes, or other aquatic habitats such as reedbeds or fen.". The box detailing derelict habitats should be amended to read, "Proposals affecting 'derelict' land (brownfield sites), allotments and railway land especially where piles of dumped materials are to be moved".
23408 - Natural England (Ms Janet Nuttall) [6952]	Object	Lighting - impacts of lighting are vaguely touched upon in Table 1 and in paragraph 3.47. Is there scope for expanding upon this anywhere (minimal use to prevent disturbance to nocturnal behaviour as well as lower energy consumption etc), or will this be covered in another SPD?		Comment noted. The level of consideration given to proposals resulting in increased lighting levels in Table 1 is considered to be adequate to trigger survey and assessment of sites.	No change.

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23278 - MKA Ecology (Mr Marcus Kohler) [9833]	Object	<p>I feel that any building with weather boarding and tiles has the potential for bats, regardless of whether it is 200 m from woodland or water. What about hedgerows and ditches, single tree lines etc? These features can encourage bats and enable colonisation of associated buildings.</p> <p>This applies to the other building classifications as well in this table. It is too prescriptive for bats and does not consider the ability of this species to colonise when only areas of scrub or single trees are present. BCT guidelines refer to the features of the buildings not the proximity of water or woodland.</p>	Remove the distance parameter from woodland and water from all designations. Consider adding all classifications as given in table 6.2 of BCT bat mitigation guidelines.	Comment accepted. The reasoning for keeping the distances as trigger points was to ensure a degree of consistency with the emerging guidance being produced by the Association of Local Government Ecologists (it is felt that this guidance may eventually become national guidance). It was felt that a distance parameter was necessary in order to prevent a very large amount of applications being subject to this level of scrutiny, however this approach does not put species conservation first which is the ultimate purpose of this SPD. Buildings with weather boarding offer much scope for bat roosts and should be the subject of bat surveys. This ensures that this type of building is given the same level of importance as pre-1914 buildings with gable ends or slate roofs. The remaining bullet points shall still have a distance parameter associated with them in order to guide applicants and planning staff.	The second bullet point of Table1 should be amended to read "all buildings with weather boarding and/or hanging tiles regardless of location."
<b>3.13</b> 23333 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	<p>It would be useful for the document to include some guidance on what is considered a suitable qualified / experienced person or competent ecologist.</p> <p>For example:            * A degree or relevant training in ecology or a related subject.            * Membership of a professional body that represents and supports ecologists and environmental managers e.g. IEEM            * Knowledge and experience of ecological surveying (habitats and species), habitat management, biodiversity policy and legislation.</p>		Comment noted.	Amend paragraph 3.7 and 3.16, forth lines, to read, "The survey should be undertaken and prepared by competent persons with suitable qualifications and experience (such as a member of the Institute of Ecology and Environmental Management) and must be carried out at an appropriate time and month of year, in suitable weather conditions and using nationally recognised survey guidelines or methods where available."

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<i>Table 2</i>					
23325 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	1. Designated Sites Add in protected road verges.  2. Priority Habitats Add in Traditional orchards (these have recently been added to the priority list).		Comment accepted.	Table 2, Under "regionally and locally designated sites" insert, "Protected Road Verges (PRV)". Amend paragraph 3.68 for consistency, "Protected Roadside Verge" to become "Protected Road Verge". Under "Priority Habitats" insert "Traditional orchards"
23405 - Natural England (Ms Janet Nuttall) [6952]	Object	Ramsar site is the unofficial name - should be Wetlands of International Importance (then Ramsar site in brackets if you like).		Comment noted.	Table 2, insert "Wetlands of International Importance (Ramsar site)"
<i>3.24</i>					
23400 - Natural England (Ms Janet Nuttall) [6952]	Object	We suggest that this includes a specific reference to Priority Species.		Comment noted. The text in paragraph 3.26 draws attention to how this Biodiversity Issue relates to Priority Species. Furthermore, Table 1 is specifically focused on Priority Species. It is considered that enough focus has already been given to the subject.	No change.
<i>3.25</i>					
23299 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	In Biodiversity Issue B1 the requirement for development to contribute to a net biodiversity gain goes beyond what the relevant policies in the adopted DPDs state. For example in Policy NE/6(1), adding to biodiversity is just one of a number of opportunities that will be considered. Net biodiversity gain is not a DPD policy requirement. The fourth point "Contribute to a net biodiversity gain as a means to achieve sustainable development" should therefore be deleted.	The fourth point "Contribute to a net biodiversity gain as a means to achieve sustainable development" should be deleted.	Comment noted. PPS9, Key Principle ii states, "Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity.." Whilst it is acknowledged that "net gain" is not specifically sought at policy level the requirement for addition to biodiversity is.	The text box at 3.25, last sentence, should be have the words "a net" deleted so that it reads "Contribute to biodiversity gain as a means to achieve sustainable development."

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23288 - Cambridge City Council (Ms Joanna Gilbert-Wooldridge) [10122]	Object	According to PPS12, a planning authority may prepare Supplementary Planning Documents to provide greater detail on the policies in its Development Plan Documents. SPDs should not be prepared with the aim of avoiding the need for the examination of policy, which should be examined. We are concerned that this 'Biodiversity Issue' is quite strongly worded and may be straying into the development of new policy.	Amend 'The District Council will require development to:' to 'Development should:'.	Comment accepted.	In text box at 3.25 of "The District Council will require development to.." change to Development should..."
23365 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	'Appropriate public access' should be more defined and statement made that some areas may be too sensitive to include public access and thus some areas need to remain wildlife sanctuaries to protect sensitive species (predominantly faunal). This to create a balanced approach which benefits both people and wildlife and considering the increased pressure at the rural urban fringe areas to major towns/cities and settlements.		Comment noted. It is very hard to define "appropriate public access" and it can only really be decided on a case-by-case basis. Paragraph 3.37 draws attention to the fact that in the few cases where there are habitats or species that are particularly sensitive to disturbance, such as badger setts, specific mitigation and / or specific management proposals will be required to be presented prior to the commencement of development.	No change proposed.
23406 - Natural England (Ms Janet Nuttall) [6952]	Object	There isn't a specific issue covering priority species, but instead Issue B1 covers the protection etc of habitats and therefore the species they support. I just wonder whether this sufficiently covers priority species outside of natural and semi-natural habitats (e.g. bats/barn owls that rely on man made structures)?		Comment noted. The text in paragraph 3.26 draws attention to how this Biodiversity Issue relates to Priority Species. Furthermore, Table 1 is specifically focused on Priority Species. It is considered that enough focus has already been given to the subject.	No change.
23337 - Homes and Communities Agency (Mr Mark White) [2347]	Object	In Biodiversity Issue B1 the requirement for development to contribute to a net biodiversity gain goes beyond what the relevant policies in the adopted DPDs state. For example in Policy NE/6(1), adding to biodiversity is just one of a number of opportunities that will be considered. Net biodiversity gain is not a DPD policy requirement. The fourth point "Contribute to a net biodiversity gain as a means to achieve sustainable development" should therefore be deleted.	The fourth point "Contribute to a net biodiversity gain as a means to achieve sustainable development" should be deleted.	Comment noted. PPS9, Key Principle ii states, "Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity.." Whilst it is acknowledged that "net gain" is not specifically sought at policy level the requirement for addition to biodiversity is.	The text box at 3.25, last sentence, should be have the words "a net" deleted so that it reads "Contribute to biodiversity gain as a means to achieve sustainable development."

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23349 - Homes and Communities Agency (Mr Mark White) [2347]	Object	Reference should be made in this paragraph to the fact that it is an offence to knowingly spread invasive species and that there are a number of pieces of legislation in place. These could usefully be referenced in the text. Also guidance on the control and removal of invasive plants is available from the Environment Agency, Natural England and DEFRA.	<p>Amend paragraph 3.27 to begin as follows:</p> <p>"It is an offence under section 14(2) of the Wildlife and Countryside act 1981 to "plant or otherwise cause to grow in the wild" any plant listed in Schedule nine, Part II to the Act. In addition, under the Weeds Act 1959 the Secretary of State may serve an enforcement notice on the occupier of land on which injurious weeds are growing, requiring the occupier to take action to prevent the spread of injurious weeds. The Weeds Act specifies five injurious weeds: Common Ragwort, Spear Thistle, Creeping of Field Thistle, Broad Leaved Dock and Curled Dock. Vigorous or invasive non-native plant species..."</p> <p>It is suggested that paragraph 3.27 is concluded as follows:</p> <p>"...or undertaken to control the invasive species. For example any Japanese knotweed contaminated soil or plant material to be disposed of is likely to be classified as 'controlled waste' under the Environmental Protection Act 1990. Untreated knotweed is not regarded as a 'hazardous waste' under the Hazardous Waste Regulations 2005 but material containing knotweed that has been treated with certain herbicides could be. Guidance on the control and removal of invasive plants is available from the Environment Agency, Natural England and defra. The Control of Pesticides Regulations 1986 require any person who uses a pesticide to take all reasonable precautions to protect the health of human beings, creatures and plants,</p>	Comment noted. Whilst it is not the purpose of this SPD to provide specific legal guidance it is felt useful to include further reference to the core legislation in this case.	Insert additional text at the end of paragraph 3.27, "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."

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<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
			safeguard the environment and in particular avoid the pollution of water. Approval from the Environment Agency should be sought before application of pesticides in or near water."		

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<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
23311 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	Reference should be made in this paragraph to the fact that it is an offence to knowingly spread invasive species and that there are a number of pieces of legislation in place. These could usefully be referenced in the text. Also guidance on the control and removal of invasive plants is available from the Environment Agency, Natural England and DEFRA.	<p>Amend paragraph 3.27 to begin as follows:</p> <p>"It is an offence under section 14(2) of the Wildlife and Countryside act 1981 to "plant or otherwise cause to grow in the wild" any plant listed in Schedule nine, Part II to the Act. In addition, under the Weeds Act 1959 the Secretary of State may serve an enforcement notice on the occupier of land on which injurious weeds are growing, requiring the occupier to take action to prevent the spread of injurious weeds. The Weeds Act specifies five injurious weeds: Common Ragwort, Spear Thistle, Creeping of Field Thistle, Broad Leaved Dock and Curled Dock. Vigorous or invasive non-native plant species..."</p> <p>It is suggested that paragraph 3.27 is concluded as follows:</p> <p>"...or undertaken to control the invasive species. For example any Japanese knotweed contaminated soil or plant material to be disposed of is likely to be classified as 'controlled waste' under the Environmental Protection Act 1990. Untreated knotweed is not regarded as a 'hazardous waste' under the Hazardous Waste Regulations 2005 but material containing knotweed that has been treated with certain herbicides could be. Guidance on the control and removal of invasive plants is available from the Environment Agency, Natural England and defra. The Control of Pesticides Regulations 1986 require any person who uses a pesticide to take all reasonable precautions to protect the health of human beings, creatures and plants,</p>	Comment noted. Whilst it is not the purpose of this SPD to provide specific legal guidance it is felt useful to include further reference to the core legislation in this case.	Insert additional text at the end of paragraph 3.27, "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."

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			safeguard the environment and in particular avoid the pollution of water. Approval from the Environment Agency should be sought before application of pesticides in or near water."		
<i>3.29</i>					
23326 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	It would be helpful to clarify the use of the term 'wildlife sites'. This can be interpreted in many different ways - perhaps add a definition into the glossary if necessary, however check if it is the same as the use of the term Biodiversity Site which first appears on page 22. The document needs to be consistent to avoid confusion.		Comment noted. It is accepted that by the words "wildlife site" a degree of confusion could arise with either County Wildlife Site or Biodiversity Site. In order to avoid confusion the following re-wording is proposed.	At paragraph 3.29 a first sentence amendment is proposed, "The creation and enhancement of habitats adjacent to existing biodiversity rich areas to complement and provide a buffer for biodiversity will be sought."
<i>3.30</i>					
23366 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Picture annotation: Suggestion is to add "... wildlife habitats together with the integration of bird boxes."		Comment accepted. Additional text to draw further attention to the subject.	At paragraph 3.30, Proposed addition to picture annotation at the end of the sentence include "together with the integration of bird boxes".
23407 - Natural England (Ms Janet Nuttall) [6952]	Object	Possibly also mention the potential biodiversity gains from well designed SUDS?		Comment accepted. It should also be noted that paragraph 3.79 contains a little further information on SUDS and that the issue is expected to be addressed with the forthcoming Design Guide SPD.	At paragraph 3.30 included with additional text of paragraph, "This may result through the careful integration of a Sustainable Urban Drainage System (SUDS) within the site"
<i>3.31</i>					
23289 - Cambridge City Council (Ms Joanna Gilbert-Wooldridge) [10122]	Object	Whilst we support this aspiration, in this instance, it might be useful to state that Article 4 directions remove specified "permitted development" rights and therefore require a formal planning application to be submitted where one would not normally be required.	It might be useful to state that Article 4 directions remove specified "permitted development" rights and therefore require a formal planning application to be submitted where one would not normally be required.	Support noted.	No proposed change to text.

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<b>3.34</b>					
23367 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Picture annotation: 'diversify arable landscapes' - this seems strange as arable landscape can have high wildlife value and a lot of local BAP-species do require arable environments and the encouragement to convert such to gardens is awkward. Should be rephrased and first part of sentence omitted - i.e. "Garden boundaries and intrusive fencing can be softened through..."		Comment noted. The text in paragraph 3.33 details how the species of farmland may not be replicable within the garden environment and that such issues will be consider in a COU for garden extension. It is still felt that the statement "Garden extensions can provide an opportunity to diversify arable landscapes" is correct and that through careful landscaping schemes benefits to BAP species can be achieved.	No change.
23312 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	Boundaries should be appropriate to their setting and landscape character, if the treatment is typically a local distinctive style of fencing, a ditch or a hedgerow, that edge treatment should be adopted to ensure it is not alien to its surroundings and maintenance of the local landscape character.	Paragraph should be changed to the following:  "Applicants where appropriate may be required to plant native species hedges to define boundaries in open countryside to assist the natural movement of animals."	Comment accepted.	At paragraph 3.34 amend text by adding, "where appropriate" and deleting "normally" so that paragraph 3.34 reads, "Applicants, where appropriate, will be required to plant native species hedges to define boundaries in open countryside as opposed to the erection of fences that may hinder the natural movement of animals."
23350 - Homes and Communities Agency (Mr Mark White) [2347]	Object	Boundaries should be appropriate to their setting and landscape character, if the treatment is typically a local distinctive style of fencing, a ditch or a hedgerow, that edge treatment should be adopted to ensure it is not alien to its surroundings and maintenance of the local landscape character.	Paragraph should be changed to the following:  "Applicants where appropriate may be required to plant native species hedges to define boundaries in open countryside to assist the natural movement of animals."	Comment accepted.	At paragraph 3.34 amend text by adding, "where appropriate" and deleting "normally" so that paragraph 3.34 reads, "Applicants, where appropriate, will be required to plant native species hedges to define boundaries in open countryside as opposed to the erection of fences that may hinder the natural movement of animals."

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<b>3.35</b>					
23412 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	Pleased the biodiversity of gardens have been recognised but the development of rear gardens en masse could have an unacceptable impact on biodiversity (see paragraph 1.13) as they lie within the village envelope there is a presumption in favour of development. As has happened in Shelford sites are tied up, scrub removed, trees trimmed back, old trees with decay removed on safety grounds. New houses tend to have tidy gardens. How can this be effectively compensated for?		Point of concern shared. However, the re-use of such site's often meets many other policy requirements. As such a balance must be struck. Where no Priority Species or Habitats are present it is hard to insist upon the retention of such features. The requirement for Biodiversity Site Survey and Assessment should be bourn in mind (as detailed in table 1). The use of local knowledge through such bodies as the Biological Records Centre could also become import as could the management and creation of new local wildlife areas where negotiation with applicants may secure S106 funds to deliver off-site benefits.	No change.
23368 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Should also be stated that biodiversity will be richer if either no or low pesticide and artificial fertiliser usage is prevalent - otherwise it could be quite a species poor environment. In addition, appropriate management is essential to enrich a garden's wildlife too.		Comment noted. However, this is not considered to be a planning matter and as such is not felt to be necessary for inclusion within the SPD.	No change.
<b>3.36</b>					
23351 - Homes and Communities Agency (Mr Mark White) [2347]	Object	The biodiversity value of a garden based on size is an assumption and often incorrect as a large highly maintained garden (through fertilisers, and pesticides) with a manicured lawn with very limited range of planting species may have a low ecological value in comparison to a neglected over grown small garden with a diversity of plants that have naturally colonised the garden.	Paragraph 3.36 should be deleted.	Comment noted. The point that larger gardens tend to have more biodiversity value has been established through surveys (London Garden Survey, Cambridge Garden Survey 2002).	No change.

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23313 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	The biodiversity value of a garden based on size is an assumption and often incorrect as a large highly maintained garden (through fertilisers, and pesticides) with a manicured lawn with very limited range of planting species may have a low ecological value in comparison to a neglected over grown small garden with a diversity of plants that have naturally colonised the garden.	Paragraph 3.36 should be deleted.	Comment noted. The point that larger gardens tend to have more biodiversity value has been established through surveys (London Garden Survey, Cambridge Garden Survey 2002).	No change.
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<b>3.37</b>					
23413 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	Maybe here refer to the new public open space standards which place the emphasis on usable land which will have biodiversity value?		Comment noted. The public open space standards are the subject of their own SPD.	No change.
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<b>3.38</b>					
23369 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Proposal Map - should not just show the main designated sites but also the Countryside Enhancement Areas as outlined in the Biodiversity Strategy 2006. This to better reinforce the protection and enhancement of these specified areas within the planning process.		Comment noted. PPS12 states that, "The adopted proposals map should: Identify areas of protection, such as nationally protected landscape and internationally, nationally and locally-designated areas and sites, and green belt land". Whilst the Countryside Enhancement Area map is contained with the Biodiversity Strategy it forms a vision of how biodiversity conservation might move forward in the district. It is not considered appropriate to move the information on to the Proposals Map. However, the later comments of the respondent in 23370 are worthy of detailed consideration and appropriate changes are addressed in that point.	No change.
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23414 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	Could the clay pit in Granhams Rd be added to the list?		Comment noted. The Clay Pit would only be considered as a Biodiversity Site if it met the criteria as listed. It would be for the site owners/managers to make a case for the site through a process of site survey and assessment. Contact with the Cambridgeshire and Peterborough Biological Records Centre would be a useful first point of contact. It is doubtful that at present the site would be worthy of inclusion upon the LDF Proposals Map.	No change.
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3.44 23415 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	Is it worth mentioning that a local sites partnership for Cambridgeshire may be established and new LS will be included. Is there a mechanism for this? Country Parks should be included in the list.		Comment noted. In Cambridgeshire the County Wildlife Sites (CWS) process represents Local Sites. Country Parks may be CWSs or LNRs, the definition of a country park is also rather vague. The inclusion of Country Parks on in the SPD is not considered necessary.	No change.
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23370 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	It is absolutely paramount that the Countryside Enhancement Areas as outlined in the Biodiversity Strategy 2006 are fully listed here and a map is included. This to ensure that these areas will be better protected and enhanced as part of the planning process.  In addition the Society strongly considers that all the existing Country Parks and similar major current and future provisions (e.g. Wandlebury CP, Milton CP, Magog Down, Coton Countryside Reserve) should be listed here as they also provide areas where people engage with and experience biodiversity, and thus contribute towards peoples 'quality of life'.		Comment accepted. The Countryside Enhancement Area and Wildlife Corridor map as shown in the Biodiversity Strategy is an important planning tool. It should be moved into the SPD to ensure that applicants are fully aware of it when considering planning applications and how they might contribute towards biodiversity gain. This also produces a knock-on effect of needing to bring forward the Wildlife Corridors as they are on the same map and similarly need to have their profile raised.	At paragraph 3.62, add an additional second sentence of, "The map of the Countryside Enhancement Areas is presented over the page as Map 2." Additional text after paragraph 3.63, "Page left blank intentionally - Insert Map 2 "Countryside Enhancement Areas and Wildlife Corridors".
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23327 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	Add Protected Roadside Verges to the list of sites.		Comment noted and accepted.	Addition of "Protected Road Verge" to paragraph 3.44

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3.45					
23316 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	<p>Paragraph 3.45 cuts directly across Policy SF/11 of the adopted DCP DPD which provides the proper policy basis for assessing 'open space standards'. There cannot be two methods of assessing open space standards. The ANGST standards are inconsistent with the adopted policy and therefore the whole of paragraph 3.45 should be deleted.</p> <p>If the local authority is not minded to delete paragraph 3.45, it should be amended to correctly reference the source document. ANGST is not contained with PPG17 but within 'Assessing needs and opportunities: a companion guide to PPG17'.</p>	<p>The whole of paragraph 3.45 should be deleted.</p> <p>If the local authority is not minded to delete the reference to ANGST, the paragraph should be amended as follows:</p> <p>"Open space targets - In order to encourage the further provision of biodiversity areas (and non-statutory sites) through development English Nature's Accessible Natural Green Space Target (ANGST) will be aspired to. The provision of new LNRs is one such mechanism to achieve the target and deliver necessary quality open space. The ANGST criteria as set out in the companion guide to PPG17 advocates the following:"</p>	<p>Comment accepted in part. The DCP DPD policies must always be the principle measures against which planning decisions are made. The reference to Natural England's ANGST in this context must not cause confusion. The ANGST was to be "aspired" to as stated in paragraph 3.45. However, confusion must be avoided.</p>	<p>Paragraph 3.45 be re-worded as such: "Open space targets - The policy requirements of the adopted DCP DPD policy SF/11 "open space standards" will always be the primary driver for open space provision. However, in order to encourage further access to biodiversity areas through development Natural England's Accessible Natural Green Space Target (ANGST) will be aspired to. The provision of new LNRs is one such mechanism to achieve the target and deliver necessary quality open space for experiencing biodiversity. The ANGST criteria as set out in "Assessing needs and opportunities: a companion guide to PPG17" require the following:"</p>
23402 - Natural England (Ms Janet Nuttall) [6952]	Object	<p>English Nature should read Natural England - note this occurs in several places in the document.</p>		<p>Comment noted.</p>	<p>Change at paragraph 3.45 and elsewhere within the document of "English Nature" to "Natural England".</p>

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23354 - Homes and Communities Agency (Mr Mark White) [2347]	Object	<p>Paragraph 3.45 cuts directly across Policy SF/11 of the adopted DCP DPD which provides the proper policy basis for assessing 'open space standards'. There cannot be two methods of assessing open space standards. The ANGST standards are inconsistent with the adopted policy and therefore the whole of paragraph 3.45 should be deleted.</p> <p>If the local authority is not minded to delete paragraph 3.45, it should be amended to correctly reference the source document. ANGST is not contained with PPG17 but within 'Assessing needs and opportunities: a companion guide to PPG17'.</p>	<p>The whole of paragraph 3.45 should be deleted.</p> <p>If the local authority is not minded to delete the reference to ANGST, the paragraph should be amended as follows:</p> <p>"Open space targets - In order to encourage the further provision of biodiversity areas (and non-statutory sites) through development English Nature's Accessible Natural Green Space Target (ANGST) will be aspired to. The provision of new LNRs is one such mechanism to achieve the target and deliver necessary quality open space. The ANGST criteria as set out in the companion guide to PPG17 advocates the following:"</p>	<p>Comment accepted in part. The DCP DPD policies must always be the principle measures against which planning decisions are made. The reference to Natural England's ANGST in this context must not cause confusion. The ANGST was to be "aspired" to as stated in paragraph 3.45. However, confusion must be avoided.</p>	<p>Paragraph 3.45 be re-worded as such: "Open space targets - The policy requirements of the adopted DCP DPD policy SF/11 "open space standards" will always be the primary driver for open space provision. However, in order to encourage further access to biodiversity areas through development Natural England's Accessible Natural Green Space Target (ANGST) will be aspired to. The provision of new LNRs is one such mechanism to achieve the target and deliver necessary quality open space for experiencing biodiversity. The ANGST criteria as set out in "Assessing needs and opportunities: a companion guide to PPG17" require the following:"</p>
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3.48					
23348 - Homes and Communities Agency (Mr Mark White) [2347]	Object	<p>Biodiversity is an important consideration in the determination of a planning application. However there are numerous other considerations to be weighed up before a planning application can be determined. This SPD is also just one document in the suite of Local Development Documents, which must be read together.</p>	<p>Amend paragraph 3.48 to read: "... the planning permission will be refused unless there are other compelling material considerations to determine otherwise."</p>	<p>Comment noted. Paragraph 3.48 repeats the expectation of PPS9, Key Principle vi. It is widely accepted that the planning system is one of balance in many cases. However, it is clear that the expectation for mitigation and compensation is high, and if it cannot be provided and significant harm results then a planning permission should be refused.</p>	<p>No change.</p>
23310 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	<p>Biodiversity is an important consideration in the determination of a planning application. However there are numerous other considerations to be weighed up before a planning application can be determined. This SPD is also just one document in the suite of Local Development Documents, which must be read together.</p>	<p>Amend paragraph 3.48 to read: "... the planning permission will be refused unless there are other compelling material considerations to determine otherwise."</p>	<p>Comment accepted. Paragraph 3.48 repeats the expectation of PPS9, Key Principle vi. It is widely accepted that the planning system is one of balance in many cases. However, it is clear that the expectation for mitigation and compensation is high, and if it cannot be provided and significant harm results then a planning permission should be refused.</p>	<p>No change to paragraph 3.48</p>

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<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
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3.49

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
23290 - Cambridge City Council (Ms Joanna Gilbert-Wooldridge) [10122]	Object	We do not consider that this biodiversity issue is necessary as the existing policies NE/6 and NE/7 in the Development Control Policies Development Plan Document provide suitable coverage of this issue.	Delete this issue.	Comment accepted. At present this Biodiversity Issue does repeat some of the supporting text of the DCP DPD policy NE/6 biodiversity. As such it is considered appropriate to re-write the section with a particular emphasis on examples of mitigation and compensation.	<p>Re-write the text box after 3.49 so that it is: "Where development results in significant harm to a Biodiversity Site or a Priority Species (or Habitat) appropriate planning conditions or obligations will be required to adequately mitigate and / or compensate for the harm."</p> <p>Insert new paragraph at 3.50, "Mitigation consists of measures taken to avoid or reduce negative impacts on species or habitats. Measures may include: locating a development and its working areas and access routes away from areas of high ecological interest, fencing-off sensitive areas during a construction period, or timing works to avoid sensitive periods. Measures may be employed to protect a habitat from the operational impacts of a development such as a reedbed designed and constructed to prevent silt and road run-off from entering a watercourse."</p> <p>Deleted former 3.50 paragraph, "Avoiding net loss - The protection of habitats and species, and the avoidance of biodiversity loss is a key objective of PPS9 and the South Cambridgeshire LDF. Avoidance of adverse impact will therefore always be the preferred approach to biodiversity conservation and issue B1 should always be considered. In exceptional circumstances, where the benefits of a proposal are demonstrated to clearly outweigh the importance of biodiversity conservation, conditions will be imposed and obligations negotiated with the aim of securing compensatory habitat creation to prevent any net loss."</p>

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				<p>Insert new paragraph at 3.51 to read, "Compensation is the process of providing species or habitats benefits specifically to make up for the loss of, or permanent damage to, biodiversity through the provision of replacement areas. Any replacement area should be similar to or, with appropriate management, have the ability to reproduce the ecological functions and conditions of the resource that has been lost or damaged."</p> <p>Insert new paragraph at 3.52 to read, " Compensation shall be considered as the last resort, with priority always given to protection in entirety followed by appropriate mitigation. Where the benefits of a proposal are demonstrated to clearly outweigh the importance of biodiversity conservation, conditions will be imposed and obligations negotiated with the aim of securing compensatory habitat creation to prevent biodiversity loss."</p> <p>Delete numbered points after 3.52 to remove,</p> <ol style="list-style-type: none"> <li>1. Facilitate the survival of the species' population.</li> <li>2. Reduce disturbance to a minimum.</li> <li>3. Provide adequate compensatory habitat in order to sustain and enhance the current level of a population.</li> </ol> <p>Insert new paragraph at 3.53 to read, "Mitigation schemes may require advance surveys in order to assess species' numbers and habitat quality. This work may only be possible at certain times of the year due to the seasonal nature of species and habitats."</p>

<i>Representation No.</i>	<i>Nature Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
				<p>Insert new paragraph at 3.54 to read, "Some forms of mitigation may be relatively simple such as avoiding the bird breeding season whilst undertaking vegetation clearance. Other requirements such as those associated with avoiding harm to bats during building works at a known bat roost may be more complex. Such works may require the input of a licensed ecologist to oversee the work.</p> <p>Insert new paragraph at 3.55 to read, "Some compensatory measures can be relatively inexpensive in the scheme of a development, such as the provision of new swift nest sites. Other measures may require the construction of entirely new features, such as a bat roost building and may require planning consent in their own right."</p> <p>Delete former paragraph 3.53, "It should be noted that the translocation of species and habitats shall only be allowed as a measure of last resort."</p> <p>Retain former paragraph 3.54 and re-number it as 3.57, "The SCDC Biodiversity Strategy provides further information on methods of mitigation in section 4.4 tables 10 and 11."</p>

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<b>3.50</b>					
23300 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	The options for securing compensatory habitat creation might be better described as "conditions will be imposed or obligations negotiated...". This would then be consistent with the wording of Policy NE/6(2).	Amend paragraph 3.50 as follows: "...conditions will be imposed or obligations negotiated..."	Comment noted. See response to representation 23290 (above) which proposed a significant re-write of this section of the SPD. The change to the text as sought above is not considered necessary as the stated text does include the word "appropriate" in front of conditions or obligations.	No change
23372 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	<p>More reference details must be given to the Countryside Enhancement Areas and map of such should be published within the Biodiversity SPD to strengthen the Council's commitments to the CEAs and making them a stronger material consideration in the Planning Process, especially if the Biodiversity Strategy does not continue in the future.</p> <p>Cambridgeshire Green Vision - it is unclear what is meant by this and the Society suggests that under "Green Vision" the Green Infrastructure Strategy (Cambridgeshire Horizons 2006 and its current revision) should be specifically mentioned as well as the County Council's "50 Year Vision Map" to promote habitat enlargement, wildlife corridors and improved access and linkages for public access.</p>		Comment accepted. The Countryside Enhancement Area and Wildlife Corridor map as shown in the Biodiversity Strategy is an important planning tool. It should be moved into the SPD to ensure that applicants are fully aware of it when considering planning applications and how they might contribute towards biodiversity gain. This also produces a knock-on effect of needing to bring forward the Wildlife Corridors as they are on the same map and similarly need to have their profile raised.	<p>At paragraph 3.62, add an additional second sentence of, "The map of the Countryside Enhancement Areas is presented over the page as Map 2." And insert "Map 2 Countryside Enhancement Areas and Wildlife Corridors" (brought forward from the Biodiversity Strategy).</p> <p>Additional text at paragraph 3.66, "Wildlife Corridors are presented on Map 2 (after 3.63)".</p>
23338 - Homes and Communities Agency (Mr Mark White) [2347]	Object	The options for securing compensatory habitat creation might be better described as "conditions will be imposed or obligations negotiated...". This would then be consistent with the wording of Policy NE/6(2).	Amend paragraph 3.50 as follows: "...conditions will be imposed or obligations negotiated..."	Comment noted. See response to representation 23290 (above) which proposed a significant re-write of this section of the SPD. The change to the text as sought above is not considered necessary as the stated text does include the word "appropriate" in front of conditions or obligations.	No change

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23371 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	It is unclear how net gain / net increase in biodiversity (referred to in para 3.75) / net loss will be measured as more detailed information must be available covering each site prior to any development (i.e. statutory / non-statutory and other sites).		Comment noted. The statement of "Net increase in biodiversity" in paragraph 3.75 is an aspiration rather than something that will be actually measured.	No change.
<i>3.51</i>					
23307 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	How and when the "current level of population" can or should be defined will need to be examined on a case-by-case basis. On large sites or sites with a long lead-in or construction time or where there are species that will naturally vary in number, it will be difficult to define what is the 'current level' and whether this is actually sustainable in the long term. A greater degree of flexibility in the wording is needed to reflect different circumstances. The wording of the third point in paragraph 3.51 should be amended.	The wording of the third point in paragraph 3.51 should be amended to: "3. Provide adequate compensatory habitat in order to sustain and enhance an appropriate population level."	The original text of paragraph 3.51 has been deleted to avoid repetition of text already contain within the DCP DPD policy NE/6 biodiversity and its supporting text paragraph 7.23.	No change.
23345 - Homes and Communities Agency (Mr Mark White) [2347]	Object	How and when the "current level of population" can or should be defined will need to be examined on a case-by-case basis. On large sites or sites with a long lead-in or construction time or where there are species that will naturally vary in number, it will be difficult to define what is the 'current level' and whether this is actually sustainable in the long term. A greater degree of flexibility in the wording is needed to reflect different circumstances. The wording of the third point in paragraph 3.51 should be amended.	The wording of the third point in paragraph 3.51 should be amended to: "3. Provide adequate compensatory habitat in order to sustain and enhance an appropriate population level."	The original text of paragraph 3.51 has already been deleted to avoid repetition of text already contain within the DCP DPD policy NE/6 biodiversity and its supporting text paragraph 7.23.	No change.

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<i>3.55</i>					
23416 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	Is the legislation quoted on page 58 of the Biodiversity Strategy incorrect?		Comment noted. For clarification, in 2006 when the Biodiversity Strategy was written the advice was that Section 46 of the Planning and Compulsory Purchase Act, 2004, would supersede Section 106 of the Town and Country Planning Act 1990, this does not appear to have happen. As such when referring to planning obligations one will continue to refer to S106 agreements.	No change.
23335 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	While the County Council welcomes the importance given to appropriate public access to both preserved wildlife areas, new mitigation areas and countryside enhancement areas, we would suggest that simple 'access' is insufficient, as this does not consider how people reach access points. Sustainable transport options should be encouraged by requiring that public access should be linked into wider access networks, with a particular emphasis on linking into the wider public rights of way network.		Comment noted. It is not felt appropriate to consider transport options to future wildlife areas with this SPD. That issue would be considered in an applications individual determination.	No change.

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<b>3.56</b>					
23373 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Biodiversity Gain - clearer statement should be made with reference to opportunities to improve on-site biodiversity or in some cases more suitable off-site contributions and enhancements. In addition stronger commitments should be made also to those landowners and organisations, who undertake environmental education for local people (see also comments against paragraph 3.44) - "... provide areas where people engage with and experience biodiversity and thus contribute towards people's quality of life" (e.g. Wandlebury CP, Milton CP, Magog Down, Coton Countryside Reserve).		Comment noted. The value of securing appropriate off-site contributions to landowners and organizations is felt to be of particular merit and is perhaps not clearly made in the SPD.	Amend text at paragraph 3.56 to include additional text so that it reads, "Securing biodiversity gain - Planning obligations are an important tool in securing mitigation and compensation for losses of biodiversity caused through development, and also for securing biodiversity enhancements. In seeking biodiversity gain priority will be given to actions that help achieve Biodiversity Action Plan targets. In particular, enhancements to create appropriate access to Biodiversity Sites will be sought, especially those where landowners or organisations undertake, or increase opportunities for, environmental education; or provide areas where people engage with and experience biodiversity and thus contribute to people's quality of life. Planning obligations relating to the creation of new wildlife habitats will usually include a provision for the ongoing management of new sites for at least ten years."
<b>3.57</b>					
23301 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	In assessing contributions that form part of planning obligations, it must be recognised that there will be a wider process of defining the whole s106 for a development proposal. The wording of paragraph 3.57 should be amended.	The wording of paragraph 3.57 should be amended as follows: "... Instead assessments will be made on a case-by-case basis in the context of wider viability considerations, taking account of..."	Comment accepted.	Addition of text at 3.57 so that the last sentence reads, "Instead assessments will be made on a case-by-case basis in the context of wider viability considerations, taking account of: "
23329 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	Given that Biodiversity Issue B4 relates to all types of development. This section should be amended to make it clear whether South Cambridgeshire District Council is of the view that the scale of non-housing development will not be used to determine the contributions required for biodiversity.		Comment accepted. Biodiversity Issue 4 does in fact relate to all forms of development and should not be considered as only being triggered by housing developments. Clarification required.	Amend paragraph 3.57 to read, "Assessing contribution requirements - Unlike other service areas, contribution requirements for biodiversity features cannot be solely based on housing units or any other form of development."

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
23339 - Homes and Communities Agency (Mr Mark White) [2347]	Object	In assessing contributions that form part of planning obligations, it must be recognised that there will be a wider process of defining the whole s106 for a development proposal. The wording of paragraph 3.57 should be amended.	The wording of paragraph 3.57 should be amended as follows: "... Instead assessments will be made on a case-by-case basis in the context of wider viability considerations, taking account of..."	Comment accepted. Biodiversity Issue 4 does in fact relate to all forms of development and should not be considered as only being triggered by housing developments. Clarification required.	Amend paragraph 3.57 to read, "Assessing contribution requirements - Unlike other service areas, contribution requirements for biodiversity features cannot be solely based on housing units or any other form of development."
<b>3.59</b>					
23305 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	Paragraph 3.59 refers to Policy P7/3 of the Cambridgeshire and Peterborough Structure Plan 2003. This is not a saved Policy and does not remain in force. The reference should be deleted.	Delete the first sentence of paragraph 3.59, removing the reference to Policy P7/3.	Comments accepted. Policy P7/3 is replaced by policy NE/5.	Amended paragraph 3.59 to read, "The SCDC Development Control Policy DPD has identified a broad approach to countryside enhancement and presents it in Policy NE/5 Countryside Enhancement Areas. Similarly, the Cambridgeshire and Peterborough Biodiversity Partnership has also produced its 50 Year Vision Map (refer to the SCDC Biodiversity Strategy)."
23291 - Cambridge City Council (Ms Joanna Gilbert-Wooldridge) [10122]	Object	Policy 7/3 of the Cambridgeshire and Peterborough Structure Plan 2003 is no longer extant with implications for references in this and subsequent paragraphs on Countryside Enhancement Areas.	Remove all references to Policy 7/3 and Countryside Enhancement Areas unless they are supported elsewhere.	Comments accepted. Policy P7/3 is replaced by DCP DPD NE/5.	Amend paragraph 3.59 to read, "The SCDC Development Control Policy DPD has identified a broad approach to countryside enhancement and presents it in Policy NE/5 Countryside Enhancement Areas. Similarly, the Cambridgeshire and Peterborough Biodiversity Partnership has also produced its 50 Year Vision Map (refer to the SCDC Biodiversity Strategy)."
23343 - Homes and Communities Agency (Mr Mark White) [2347]	Object	Paragraph 3.59 refers to Policy P7/3 of the Cambridgeshire and Peterborough Structure Plan 2003. This is not a saved Policy and does not remain in force. The reference should be deleted.	Delete the first sentence of paragraph 3.59, removing the reference to Policy P7/3.	Comments accepted. Policy P7/3 is replaced by policy NE/5.	Amend paragraph 3.59 to read, "The SCDC Development Control Policy DPD has identified a broad approach to countryside enhancement and presents it in Policy NE/5 Countryside Enhancement Areas. Similarly, the Cambridgeshire and Peterborough Biodiversity Partnership has also produced its 50 Year Vision Map (refer to the SCDC Biodiversity Strategy)."

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<i>3.60</i>					
23374 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Wandlebury Ring - better to apply more commonly used term 'Wandlebury Country Park'.		Comment noted.	Amend paragraph 3.60 of "Wandlebury Ring" to "Wandlebury Country Park"
<i>3.61</i>					
23375 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Coton Farming and Countryside Reserve - please change to the name now in use 'Coton Countryside Reserve'.		Comment accepted.	Change paragraph 3.61 of "Coton Farming and Countryside Reserve" to "Coton Countryside Reserve".
<i>3.62</i>					
23417 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	Is there scope for local communities to contribute to try and achieve some of the aims rather than just being development led.		Comment noted. The Green Infrastructure Strategy simply provides a framework for potential habitat creation across the county. It certainly does not preclude any other persons or bodies from taking forward actions to enhance or create biodiversity habitats. The content of the SPD is development led as it fit more consistently with the planning framework that the SPD supports.	No change.
23376 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	'Green Vision' - Cambridgeshire Horizons has published the Green Infrastructure Strategy which is the guided document - the term "Green Vision" cannot be defined as such and is used more loosely (perhaps based on plain English for a wider audience). The SPD must clearly refer to definable documentation as developed by the District Council, County Council etc.		Comment noted and point accepted.	Replace "Green Vision" at paragraphs 3.55, 3.62 and 3.63 with "Green Infrastructure Strategy".

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<i>3.64</i>					
23328 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	The text on wildlife corridors is currently a little misleading - the map contained within the Biodiversity Strategy August 2006 should be referenced or included here to show which corridors the text is referring to, given these have already been identified. In addition this approach shouldn't discriminate against other existing corridors of potential biodiversity value, which it might if the focus is only on those corridors identified.		Comments noted. The map of the Wildlife Corridors (along with the Countryside Enhancement Areas) from the Biodiversity Strategy is to be moved in to the SPD.	After 3.63 insert Map 2 "Countryside Enhancement Areas and Wildlife Corridors"
23303 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	It is unreasonable to expect biodiversity value outside of the boundary of a development proposal to be enhanced as part of that development proposal. Third party land controls will make this unduly onerous or indeed impossible. This will include enhancing the wildlife corridors and other green infrastructure projects for the district noted. Any such aspiration needs to take into account wider viability issues and Circular 05/05. Only a contribution to such work will be appropriate and only then where this is justified.	The first paragraph of Biodiversity Issue B5 should be reworded as follows:  "Development proposals will be expected to contribute to enhancing biodiversity value. Where a contribution to off-site works is requested, including towards the identified networks of Wildlife Corridors and green infrastructure projects for the district, the contribution must be related in scale and kind to the development proposals."	Comment accepted. At present the text is rather general. In the light of Circular 05/05 the use of conditions and planning obligations should be specific, necessary and site-related.	Amend text at paragraph 3.64, first sentence of text box, to read, "Development proposals will be expected to contribute to the enhancement of biodiversity. Where a contribution to off-site works is requested regard will be had to the identified network of Wildlife Corridors and green infrastructure projects for the district."

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
23334 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	Although the County Council welcomes the degree of protection given in this document to individual hedgerows, we would also like to see more explicit recognition of the importance of hedged 'green lanes' (often public rights of way) which offer significant additional benefit both as wildlife corridors and for the public appreciation of nature. Like 'veteran trees', historic green lanes are landscape features which would take many decades to replace. They often also provide a historical link to parish Enclosure Awards in landscapes where Enclosure field boundaries may have been lost. Such 'green lanes' and their associated public access rights should wherever possible be retained in new development.		Comment noted. The habitats listed in paragraph 3.65 are taken from the wording of Regulation 37 of the UK Habitats Regulations. It is not felt that the list needs to be all inclusive to afford protection to suitable biodiversity features and Wildlife Corridors. Hedgerows are specifically listed and to most people a green lane would be considered as a site with a double hedgerow of particular significance.	No change.
23341 - Homes and Communities Agency (Mr Mark White) [2347]	Object	It is unreasonable to expect biodiversity value outside of the boundary of a development proposal to be enhanced as part of that development proposal. Third party land controls will make this unduly onerous or indeed impossible. This will include enhancing the wildlife corridors and other green infrastructure projects for the district noted. Any such aspiration needs to take into account wider viability issues and Circular 05/05. Only a contribution to such work will be appropriate and only then where this is justified.	The first paragraph of Biodiversity Issue B5 should be reworded as follows:  "Development proposals will be expected to contribute to enhancing biodiversity value. Where a contribution to off-site works is requested, including towards the identified networks of Wildlife Corridors and green infrastructure projects for the district, the contribution must be related in scale and kind to the development proposals."	Comment accepted. At present the text is rather general. In the light of Circular 05/05 the use of conditions and planning obligations should be specific, necessary and site-related.	Amend text at paragraph 3.64, first sentence of text box, to read, "Development proposals will be expected to contribute to the enhancement of biodiversity. Where a contribution to off-site works is requested regard will be had to the identified network of Wildlife Corridors and green infrastructure projects for the district.

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<b>3.65</b> 23377 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Wildlife Corridors - the Society strongly supports the concept of Wildlife Corridors. In addition it considers it as paramount that a clear statement is made to ensure in areas the creation of wildlife sanctuaries is achieved to ensure a viable balance between public access to wildlife areas and retaining refuges particularly for more sensitive native faunal species.		The support for Wildlife Corridors is noted. The creation of wildlife sanctuaries is not the focus of this Biodiversity Issue. Paragraph 3.37 draws attention to the need for mitigation and/or specific management proposals where sensitive species are considered.	No change proposed.
<b>3.66</b> 23418 - Great Shelford Parish Council (Mrs Bridget Hodge) [3518]	Object	No need for proper consideration twice! What does it mean anyway - why not go back to the original wording in PPS9 which is stronger and places the onus on the LA to maintain networks etc.		Comment accepted. PPS9 is the main policy document and the brief statement in paragraph 3.66 not specifically needed.	Delete paragraph 3.66.
<b>3.67</b> 23378 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Water-based Corridors - a clear statement should be made to achieve good design details such as ledges under bridges and within culverts, to ensure the migration of non-aquatic species can happen along linear water bodies and thus avoiding more dangerous environments such as roads. Perhaps a sketch of photograph can demonstrate such.		Comment noted. Paragraph 3.67 makes reference to the Wildlife Corridors being shown in the Biodiversity Strategy however they are being moved in the SPD. Change such reference in paragraph 3.67 by deleting "in the SCDC Biodiversity Strategy. The Biodiversity Strategy includes details of mammal ledge within bridges, the revised Design Guide can also include such details.	No change as it is not considered necessary to amend the text further.

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<b>3.68</b>					
23330 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	Please amend the contact details for Protected Roadside Verges. Background information is available from the County's Biodiversity Officer, but for detailed information on sites please contact Cambridgeshire and Peterborough Biological Records Centre. Information is also available at <a href="http://www.cambridgeshire.gov.uk/prv">www.cambridgeshire.gov.uk/prv</a> .		Comment noted and accepted.	Amend text at paragraph to read 3.68, "Background information is available from the County's Biodiversity Officer, but for detailed information on sites please contact Cambridgeshire and Peterborough Biological Records Centre. Information is also available at <a href="http://www.cambridgeshire.gov.uk/prv">www.cambridgeshire.gov.uk/prv</a> ."
<b>3.69</b>					
23340 - Homes and Communities Agency (Mr Mark White) [2347]	Object	The reference to the 'setting' of ancient woodland goes beyond what any of the relevant policies in either the DCP DPD (NE/6, NE/7 and CH/1) or the East of England Plan (ENV5) require.	The words "... setting or ..." should be deleted from Issue B6.	Comment noted and accepted. The Biodiversity SPD should not be particularly concerned with the setting of an ancient woodland unless it is intrinsic to the biodiversity value of the site, such through wildlife corridors linking the site to the wider countryside.	The words "setting or character" should be replaced by "biodiversity value".
23292 - Cambridge City Council (Ms Joanna Gilbert-Wooldridge) [10122]	Object	According to PPS12, a planning authority may prepare Supplementary Planning Documents to provide greater detail on the policies in its Development Plan Documents. SPDs should not be prepared with the aim of avoiding the need for the examination of policy, which should be examined. We are concerned that this 'Biodiversity Issue' is quite strongly worded and may be straying into the development of new policy.	Amend first paragraph to 'Development should not result in the loss of ancient woodland or its deterioration as a result of a planning consent.'	Comment accepted.	At 3.69 replace first sentence of text box with, 'Development should not result in the loss of ancient woodland or its deterioration as a result of a planning consent.'
23302 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	The reference to the 'setting' of ancient woodland goes beyond what any of the relevant policies in either the DCP DPD (NE/6, NE/7 and CH/1) or the East of England Plan (ENV5) require.	The words "... setting or ..." should be deleted from Issue B6.	Comment noted and accepted. The Biodiversity SPD should not be particularly concerned with the setting of an ancient woodland unless it is intrinsic to the biodiversity value of the site, such through wildlife corridors linking the site to the wider countryside.	The words "setting or character" should be replaced by "biodiversity value".

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<i>3.74</i>					
23293 - Cambridge City Council (Ms Joanna Gilbert-Wooldridge) [10122]	Object	According to PPS12, a planning authority may prepare Supplementary Planning Documents to provide greater detail on the policies in its Development Plan Documents. SPDs should not be prepared with the aim of avoiding the need for the examination of policy, which should be examined. We are concerned that this 'Biodiversity Issue' is quite strongly worded and may be straying into the development of new policy.	Amend 'The District Council will expect:' to 'Development should:'.  Remove 'will' from sections 1 and 2 and replace with 'should'.	The principle of new developments delivering biodiversity gains was established in the Biodiversity Strategy and adopted as Council policy in September 2006. It is therefore considered to be appropriate to retain the current wording.	No change.
23342 - Homes and Communities Agency (Mr Mark White) [2347]	Object	The requirement that on all major housing developments bird, bat or insect boxes equivalent in number to 50% of the dwellings is not founded on the basis of policies in the adopted Development Plan. There is no justification for provision on this scale. Actual numbers must be based on other considerations such as the size, design and layout of the residential scheme. In addition the extent and range of other biodiversity measures across the scheme must be taken into account.	The first point in Biodiversity Issue B7 should be amended as follows:  "1. As part of the comprehensive delivery of biodiversity on new housing sites bird, bat and insect boxes should be provided in close association with the properties."	The principle of new developments delivering biodiversity gains, specifically 50% of all dwellings on major developments to provide a bat, bird or insect box, was established in the Biodiversity Strategy and adopted as Council policy in September 2006. It is therefore considered to be appropriate to retain the current wording.	No change.
23401 - Natural England (Ms Janet Nuttall) [6952]	Object	Biodiversity Issue B7 (or other suitable section) should include a reference to the requirement for multi-functional use of green infrastructure, where feasible, to achieve biodiversity gains. For example, there is great potential for biodiversity gains through the incorporation of appropriately designed SUDS and other green infrastructure.		Comment noted. Paragraph 3.63 makes reference the Green Infrastructure Strategy. Furthermore, green infrastructure is set to be the focus of its own SPD.	No change.

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23304 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	The requirement that on all major housing developments bird, bat or insect boxes equivalent in number to 50% of the dwellings is not founded on the basis of policies in the adopted Development Plan. There is no justification for provision on this scale. Actual numbers must be based on other considerations such as the size, design and layout of the residential scheme. In addition the extent and range of other biodiversity measures across the scheme must be taken into account.	The first point in Biodiversity Issue B7 should be amended as follows:  "1. As part of the comprehensive delivery of biodiversity on new housing sites bird, bat and insect boxes should be provided in close association with the properties."	The principle of new developments delivering biodiversity gains, specifically 50% of all dwellings on major developments t provide a bat, bird or insect box, was established in the Biodiversity Strategy and adopted as Council policy in September 2006. It is therefore considered to be appropriate to retain the current wording.	No change.
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<i>3.76</i>					
23314 - Gallagher Estates (Mr Andy Lawson) [10117]	Object	The last sentence of paragraph 3.76 should be removed as it assumes professional knowledge / skill in the selection of plant species. The inappropriate unskilled use of non native species can lead to long term ecological impacts, such as the introduction of the Japanese Knotweed and therefore the encouragement of planting non native species should be avoided.	Delete the last sentence of paragraph 3.76.	Comment noted. The use of non-native species already wildly occurs in many planting schemes and such plants have their place in higher density settings bringing colour and nectar. The purpose of this statement is to recognize this point and to encourage landscape architects to carefully chose a further range of plants that may give a longer flowering period and/or provide berries or fruit for wildlife.	No change.
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23352 - Homes and Communities Agency (Mr Mark White) [2347]	Object	The last sentence of paragraph 3.76 should be removed as it assumes professional knowledge / skill in the selection of plant species. The inappropriate unskilled use of non native species can lead to long term ecological impacts, such as the introduction of the Japanese Knotweed and therefore the encouragement of planting non native species should be avoided.	Delete the last sentence of paragraph 3.76.	See response to 23314.	No change.
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<b>3.78</b>					
23331 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	No reference is made to the contribution that Sustainable Urban Drainage Systems (SUDs) can make to the enhancement of biodiversity. It is therefore suggested that this section should be expanded to explain that SUDs provide a range of functions including enhancement of biodiversity.		Comment accepted. Further reference should be given to SUDs.	Insert an additional paragraph at 3.79, "SUDs can be particularly beneficial in higher density areas due to the dual land-use that they can offer. The natural features offered by grass swales, infiltration strips, reedbeds and ponds will provide habitats for amphibians, birds, mammals and insects whilst also contributing to landscape settings and possibly open space requirements. The Design Guide SPD will provide further details on SUDs."
<b>3.79</b>					
23379 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Welcome the pro-active design detailing - suggest to add gaps in walls / fences not only for hedgehogs but also amphibians, foxes etc.		Support noted. The text needs to be succinct, if hedgehogs can use a hole then it is reasonable to assume that other small animals may also make use of it.	No change to text.
<b>3.80</b>					
23380 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Picture annotation: It should also stress that the usage of osiers and pollarded willows is in accordance with the Cambridgeshire Landscape Guidelines (County Council) and its recommendations to only choose suitable species for each landscape character.		Comment noted. The Landscape SPD will detail measures such as compliance with the Cambridgeshire Landscape Guidelines and the choice of appropriate species.	No proposed change.

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23389 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	An additional paragraph should be added to page 31 stating that detailed management plans are required.		Comment accepted. The inclusion of appropriate management plans or statements is an increasingly important issues to ensure the correct understanding of wildlife areas and their proper management"	<p>Insert additional paragraph at 3.80, "The success of wildlife areas or SUDS will depend on their proper understanding and management. Where such features are created an applicant may be expected to provide a suitable management statement or management plan. The level of detail is likely to include:</p> <ol style="list-style-type: none"> <li>1. A description of the area including a map</li> <li>2. Species and habitat targets</li> <li>3. Management prescriptions</li> <li>4. Persons responsible for undertaking the management</li> <li>5. Means of reviewing the management plan</li> </ol>
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<i>3.81</i> 23381 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Green Roofs - a clearer definition of Green Roofs is required to distinguish between the 'extensive and intensive green roofs' - i.e. the earlier with its thin material cover and growth medium more likely to support local flora and fauna (as per picture page 33 - insects, skylarks, redstarts etc) whereby intensive green roofs may have thick substrate layers encouraging lawns, shrubs and trees often using non-native species; add definition to Glossary (e.g. extensive/low substrate Green Roof - Roof covered by a low and light weight vegetation and under a low maintenance regime; a link to Sustainable Drainage Systems should also be made).		Paragraph 3.82 states briefly that different type of vegetation can be grown on roofs. This SPD is not considered to be the right place to explain the full details of extensive and intensive roof types. This may be explained in the Landscape SPD. Furthermore a web link is provide where one can find such detailed information.	No change.

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3.87					
23383 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Picture annotation - 'Anglian Chalk Natural Area' - should such not read 'Anglian Chalk Landscape Character Area' as defined by Natural England (previously English Nature)?		The use of Natural Area profiles supports the text in the DCP DPD policy NE/6 biodiversity, part 7. Whilst it is acknowledged that there appears to be a review of terminology for landscape unit descriptions, the term "Natural Areas" is still used by Natural England and explained on their website.	No change.
23382 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Should be clearly stated that farmland hosts many major Biodiversity Action Plan species (skylark, grey partridges, water voles etc) thus can be rich in valuable native wildlife.		Paragraph 3.86 states, The farmland landscape, whether it be arable or pastoral, is also important for biodiversity."	No change.

## ***Appendix 2 Legislative and National Policy Context***

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23384 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Add relevant reference to Countryside & Wildlife Act, Badger Act etc.		Comment Accepted.	In appendix 2 include references to "Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (commonly known as the Habitats Directive)", "Council Directive 79/409/EEC on the Conservation of Wildlife Birds (commonly known as the Birds Directive)", "Wildlife and Countryside Act, 1981 (as amended) (WCA 1981)", and "Protection of Badgers Act 1992".
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<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
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### *Appendix 3 Contact Details and Further Information*

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23332 - Cambridgeshire County Council (Mrs Wendy Hague) [5539]	Object	The web address of the Cambridgeshire and Peterborough Biological Records Centre should be added: www.cbbr.org.uk. They can undertake searches for designated sites and records of protected species.		Comment accepted.	In appendix 3, after useful websites add in, "Cambridgeshire and Peterborough Biological Records Centre www.cbbr.org.uk"
23385 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Add website of: * County Council - Green Vision, Green Infrastructure Strategy, 50 Year Vision Map and Cambridgeshire Landscape Guidelines; * Cambridgeshire Horizons - Green Infrastructure Strategy.		Comment accepted. Include web link details of CCC Green Vision website and Cambridgeshire Horizons Green Infrastructure Strategy. The Biodiversity Partnership 50 Year Vision Map is represented in the Biodiversity Strategy. The Cambridgeshire Landscape Guidelines are set for review and will be included within the forthcoming Landscape SPD.	In appendix 3, after useful web sites, include, "Cambridgeshire Green Vision: www.cambridgeshire.gov.uk/greenvision" and Cambridgeshire Horizons Green Infrastructure Strategy www.cambridgeshirehorizons.co.uk/search/results.aspx?siteSearch=Green%20Infrastructure%20Strategy

### *Appendix 5 SCDC BAP Priority Species and Habitats*

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23386 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	The Society regrets that only chalk rivers are more protected but not the valuable local chalk springs and streams are as such are also very rich in wildlife (NB past enquiries have confirmed that Natural England does not support chalks stream/springs).		Comment noted. There is no separation between "rivers or streams" when considering chalk rivers. All flowing watercourses originating from chalk springs with typical chalk river flora and fauna would be regarded as chalk rivers regardless of size. The reference in Table 2, part 2 to "Rivers and streams e.g. chalk streams" took account of the incorporation of chalk rivers into the "Rivers and stream" UK BAP priority habitats list. It is considered to retain the reference to chalk streams in this case as these watercourse other biodiversity potential that may otherwise be overlooked within the district.	No change.
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## *Appendix 6 Natural Area Profiles for South Cambridgeshire*

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23387 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Unclear about the reference to 'Natural Area Profiles' - are these Natural England's Landscape Character Areas? If not a clear definition and reference relating to the Natural Area Profiles must be made and definition added to glossary.		The use of Natural Area profiles supports the text in the DCP DPD policy NE/6 biodiversity, part 7. Whilst it is acknowledged that there appears to be a review of terminology for landscape unit descriptions, the term "Natural Areas" is still used by Natural England and explained on their website.	No change.
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## *Glossary*

### *Glossary*

23388 - Cambridge Preservation Society (Ms Carolin Gohler) [2125]	Object	Add definition of green roof types and Natural Area Profiles/Landscape Character Areas.		Paragraph 3.82 describes some of the types of green roofs without going into detail about their construction differences, this is considered to be appropriate for this SPD. The design guide SPD will expand on this detail if considered appropriate. The landscape SPD will explain Landscape Character Areas. The definition of Natural Areas within the glossary is considered to be useful, although it is fully explained in the DCP DPD, paragraph 7.27.	In the glossary add, "Natural Area - Are identified by a combination of physical attributes such as geology, plant and animal species, land-use and culture. These attributes combine to give an area its distinctive biodiversity."
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