

Supplementary Statement of Case

Green Belt Matters

Cambridge City Local Plan EiP 2014/15

Prepared on behalf of the Wildlife Trust

January 2015



**Bedfordshire
Cambridgeshire
Northamptonshire**

Summary of Wildlife Trust objection

1. The Wildlife Trust objects to the lack of emphasis on enhancement of the Green Belt. Policy 4 includes no reference to how the LPAs will plan positively to enhance the Green Belt, including its landscape and biodiversity.
2. Paragraph 2.53 of the supporting text states the LPAs wish to view the Green Belt as a positive planning tool, but then there is no policy or supporting text anywhere within the Local Plans seeking to enhance the quality of the Green Belt. As such the LPAs are not using the planning tools at their disposal to deliver enhancements and effect positive change.
3. The Green Belt land on the south-eastern edge of Cambridge, the Gog Magog Hills, has been identified as a key area for ecological enhancement in the Cambridgeshire Green Infrastructure Strategy (2011), Cambridge Nature Conservation Strategy (2006) and South Cambridgeshire Biodiversity Strategy (2005). This area is an ecological network supporting priority habitats and species that crosses the LPA boundaries and would benefit from considerable enhancement and is one of two main ecological networks through Cambridge City. This ecological network comprises a number of chalk grassland priority habitat and other chalk sites on this south-eastern edge of Cambridge. The priority for this area is the enhancement, restoration and creation of chalk grassland priority habitat to link together the currently isolated sites into a viable ecological network. As such it needs to be formally recognised within Local Plan policies, supporting text and proposals maps in line with paragraph 117 (and paragraphs 109 & 114) of the National Planning Policy Framework (NPPF).
4. As a result of the above the Local Plans are unsound as they are not consistent with paragraph 81 of the NPPF, are not positively prepared and will not be effective.
5. This could be rectified by including reference to the enhancement of landscape and biodiversity within both Policy 4 and the supporting text (paragraphs 2.49 – 2.53) and cross referencing this with new and amended policies and text within section 7 of the City Local Plan promoting the creation of ecological networks in line with paragraph 117 (and paragraphs 109 & 114) of the NPPF. Similar changes should be included in the South Cambs DC Local Plan.
6. The Wildlife Trust also objects to all of the allocations GB1 to GB4, which as currently provided for in policy 26 will compromise the creation and enhancement of the ecological network in the Gog Magogs Hills area. The councils have failed to properly take into account the identification and mapping of ecological networks in the preparation of their Local Plans or in these site allocations, contrary to NPPF paragraph 117.
7. In addition, the allocations GB1 and GB2 will result in damage to and compromise the long-term effective management of Netherhall Farm Meadow County Wildlife Site (CWS) contrary to policies 69 and 70 of the submission local plan (2013).
8. Further, policy 26 and the supporting text makes no mention of Beechwoods LNR, which is only 1 Km from the new development and (although in South Cambs) will become a destination for and act de-facto as an open space of environmental importance for the residents of the new development. This site supports priority habitat and species and is likely to be selected as a County Wildlife Site in the near future, but is already under pressure from the current numbers of visitors. The new development will increase this pressure and create an additional management burden which the policy and supporting text fails to acknowledge. As such the development could be considered contrary to policies 67, 68, 69 and 70 of the submission local plan (2013).

9. The Wildlife Trust therefore contends that the site allocations are unsound as they are not consistent with national policy, are not positively prepared and will not be effective as currently worded.
10. Should the allocations be retained, then both policy 26 and the supporting text must be amended to ensure that these developments make a significant contribution towards delivery of green infrastructure priorities, particularly the creation of chalk grassland habitat and linkages within the Gog Magogs Hills area (ecological network). This should include, though not be limited to, additional protection or compensatory measures provided for the likely damage to Netherhall Farm Meadow CWS, an appropriate contribution towards long-term management costs for Netherhall Farm Meadow CWS and Beechwoods LNR, and the creation and long-term management of chalk grassland habitat linkages.
11. This policy should also be cross referenced this with new and amended policies and text within section 7 of the City Local Plan promoting the creation of ecological networks in line with paragraph 117 (and paragraphs 109 & 114) of the NPPF. Similar changes should be included in the South Cambs DC Local Plan.

Reasoned justification

NPPF paragraph 81 states: *“LPAs should plan positively to enhance the beneficial use of the Green Belt...including e.g. to retain and enhance landscapes...and biodiversity...”*

NPPF paragraph 117 states: *“To minimise impacts on biodiversity and geodiversity, planning policies should:- plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks...; promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species...”*

However, neither Local Plan has included effective policies and / or supporting text to achieve the requirements of the above two paragraphs of the NPPF.

The area south-east of Cambridge, spanning the administrative boundary between Cambridge City and South Cambridgeshire District, comprises a network of chalk grassland sites (priority habitat) and arable farmland, which in itself supports a range of priority and / or threatened species. This area is known locally as the Gog Magog Hills and is clearly an important ecological network worthy of formal recognition within the Local Plans, either as a local Nature Improvement Area or through some other local definition.

The Gog Magog Hills comprises the following sites with chalk grassland priority habitat:

- Cherry Hinton Chalk Pits SSSI
- Gog Magogs Golf Course SSSI
- Roman Road SSSI
- Fleam Dyke SSSI
- Fulbourn Fen SSSI
- Lime Kiln Reservoirs County Wildlife Site (CWS)
- Wort's Causeway road verges CWS
- Netherhall Farm Meadow CWS
- Wandlebury CWS
- Signal Hill Plantation CWS
- Worstead Lodge road verge CWS

- Fleam Dyke Pumping Station CWS
- Lime Kiln Hill verges & hedgerow LWS
- Beechwoods Local Nature Reserve
- Fulbourn Road protected road verge
- Magog Down
- Stapleford Pit

Most of these sites are shown on the respective Local Plan maps, however these maps fail to recognise their function as part of a wider ecological network. We have included a map of local sites in both the City and the surrounding areas of South Cambs at appendix 2, to better show these linkages. None of these sites in isolation is viable for all of the species they currently support. Without better management, enlargement and buffering of sites, and the creation of habitat linkages between them across the intervening arable and urban landscape, there is likely to be a further loss of biodiversity.

Many of these sites also support priority and / or threatened species, including the following vascular plants; Grape Hyacinth, Moon Carrot, Basil Thyme, Purple Milk-vetch, Perennial Flax and White Helleborine. In addition several priority invertebrates are present such as the Chalk Carpet Moth and Small Blue and Small Heath butterflies. Several of these species are very limited in their UK and English distributions with the Cambridge area being of national significance for them.

The intervening farmland is also known to support a range of priority farmland bird species including; Grey Partridge, Yellow Wagtail, Skylark, Yellowhammer, Linnet, Bullfinch, Dunnock, Reed Bunting and Song Thrush. In addition, the area supports rare and declining arable plant species and invertebrates including; Corn Gromwell, Venus's Looking-glass, as well as the beetle *Ophonus punctatulus*. Other natural features of significance include some species-rich hedgerows and a Barbastelle bat roost at Netherhall Farm. Taken together the biodiversity and ecological importance of this area is worthy of formal recognition in the Local Plans.

The importance of this area as an ecological (or strategic green infrastructure) network has already been recognised in other published documents produced or endorsed by the LPAs, including the Cambridgeshire Green Infrastructure Strategy (2011) and the Cambridge Nature Conservation Strategy (2006). Relevant extracts from each of these strategies is included in the appendices, in particular relating to the area south-east of Cambridge. However, the strategic network identified in the Green Infrastructure Strategy (see appendix 1) clearly demonstrates the importance of the Cambridge Green Belt in delivering more positive land uses and public benefits, rather than merely as somewhere not to allocate housing. A suite of green infrastructure projects have been identified within the Green Belt around Cambridge and not just to the south-east of the city.

The State of Nature Report (2013) produced by a consortium of national conservation and research organisations demonstrated the continuing decline in biodiversity with 60% of 3,148 species for which there were accurate records showing declines in populations and / or distributions over the past 40 years and 30% of these showing a sharp decline. The report also highlighted that 10% of species studied in the UK were under threat of disappearing altogether. It is now clear that the international commitment to halt the loss of Biodiversity by 2020 will be missed in the UK.

If society wants to stop and reverse this trend of wildlife loss and provide for nature's recovery, we have to expand, restore and recreate habitats on a landscape-scale, way beyond the boundaries of traditional nature reserves and wildlife sites. This requires active and positive intervention across all areas of society, including land-use planning and the

proper implementation of biodiversity policies as set out in the NPPF. The Lawton Review: *Making Space for Nature* (2010) revealed “serious short-comings” in our existing network of protected sites and land. It concluded that we need to take steps to re-build nature by providing more natural areas, which are bigger, better managed, and more joined up, so that existing fragments of wildlife-rich land are re-connected to create a climate-resilient and self-sustaining whole. This in turn was reflected in the NPPF which identifies the need for ecological networks to be recognised and created through land-use planning at paragraphs 109, 114 and 117.

The area south-east of Cambridge is clearly one that requires and would benefit from a positive approach to land-use planning and one where the enhancement of the Green Belt and the conservation of biodiversity are complementary. In order to achieve Local Plans that are effective, positively prepared and consistent with national policy requires changes to the Green Belt (and natural environment) policy wording and supporting text. In addition, site allocations GB1 and GB2 (and to a lesser extent GB3 and GB4) have been made without proper consideration of the need to create and enhance ecological networks and so should be deleted.

These site allocations compromise the achievement of a Gog Magog Hills ecological network by isolating Netherhall Farm Meadow from the other sites in the network and by developing and sterilising green belt land that has significant potential for habitat creation as part of a wider ecological network.

Further, site allocations GB1 and GB2 will result in long-term damage to Netherhall Farm Meadow CWS, contrary to policies 69 and 70 of the local plan. This is because the site will become isolated from the surrounding countryside by the new housing and because any attempts to limit access (as suggested at bullet point q) are unlikely to be successful. Without the prevention of public access (other than visual access) and access only for site management, the long-term management of this site will be compromised. Essential management for this site comprises continuation of an annual hay cut and supplementary cutting and or grazing. However, a hay cut will not be viable if the area becomes used by dog walkers with the inevitable dog fouling that follows, as the hay will become unsaleable. Without sensitive management, the species-richness of the site will decline over time and eventually the quality of the priority habitat will decline to a point where it no longer reaches the quality required for selection as a CWS or as priority habitat.

The allocation of a further 430 dwellings in this area will also inevitably result in increased visitor numbers to Beechwoods Local Nature Reserve, managed by the Wildlife Trust, which is only 1 Km from the new development and easily accessible on foot or by car. Beechwoods will become a destination for and act de-facto as an open space of environmental importance for the residents of the new development. This site supports priority habitat and species (including White Helleborine orchids) and is likely to be selected as a County Wildlife Site in the near future. However, it is already under pressure from the current numbers of visitors, with paths becoming worn and eroded in places, and areas of former chalk grassland now bare chalk. The new development will increase visitor pressure and create an additional management burden which the policy and supporting text fails to acknowledge, as well as increase damage to the site. As such the development may be contrary to policies 69 and 70 of the local plan, and possibly even policies 67 and 68 on open space.

Should these site allocations be retained in the local plan, then both policy 26 and the supporting text must be amended to require these developments to provide a significant contribution towards the delivery of green infrastructure priorities, particularly the creation of chalk grassland habitats and linkages within the Gog Magog Hills ecological network. This should include, though not necessarily be limited to:

- additional protection or compensatory measures provided for the likely damage to Netherhall Farm Meadow CWS, including the creation of at least an equivalent area of new chalk grassland priority habitat off-site;
- an appropriate contribution towards long-term management costs for Netherhall Farm Meadow CWS;
- an appropriate contribution towards long-term management costs and new access infrastructure at Beechwoods LNR; and
- the creation of chalk grassland habitat linkages, with funding for long-term management, between sites GB1 / GB2 and GB3 / GB4, and between these site allocations and Beechwoods / Wandlebury / Gog Magogs Golf Course.

Without such changes the Local Plan will not be effective, positively prepared and consistent with national policy.

Proposed changes to wording of Policy 4 & supporting text (paragraphs 2.49 – 2.53)

Policy 4 additional wording

The City Council will seek to enhance the landscape and biodiversity value of the Green Belt and enhance access in appropriate locations in line with the Cambridgeshire Green Infrastructure Strategy (2011) and Cambridge Nature Conservation Strategy (2006).

Supporting text additions (para 2.53)

The City Council will work with partners to promote landscape and biodiversity enhancements and beneficial access in appropriate locations in line with the Cambridgeshire Green Infrastructure Strategy (2011) and Cambridge Nature Conservation Strategy (2006). Positive changes have occurred in recent years within the Gog Magogs Hills area (or local Nature Improvement Area, see below). Enhanced access has been created to Wandlebury Country Park and Cherry Hinton Chalk Pits, where calcareous grassland is also being restored, both through dedicated funding for green infrastructure improvements. There are further opportunities to enhance the farmland environment and to create new habitat linkages and enhanced access between the chalk grassland and other sites in this area. West of Cambridge, the Coton Countryside Reserve has been created to provide new access and improved landscape and wildlife habitats and further enhancements are also planned in this area.

Proposed changes to wording of Policy 26 & supporting text (paragraphs 3.109 – 3.111)

The Wildlife Trust preference is for these site allocations to be removed from the Local Plan. However, should they be retained, we suggest the following amendments (new text in blue, deleted text in red).

Policy 26 revised wording

f. the assessment of the sites for potential for biodiversity enhancement and the creation of an ecological corridor between ~~both sites~~ *allocations GB1 / GB2 and GB3 / GB4, and between both of these allocations and Beechwoods LNR, Wandlebury CWS and Gog Magogs Golf Course SSSI, to contribute to the Gog Magog Hills ecological network (or local Nature Improvement Area).*

q. the retention of sufficient buffer areas around the Netherhall Farm Meadow County Wildlife Site, the provision of a long-term management regime, including limited access (*for management purposes only*), to protect and enhance the ecological value of the meadow, and assessment of the wider ~~site~~ *area* for potential to create ~~an~~ *a chalk grassland* ecological

corridor ~~between~~ from sites GB1 and GB2 towards both Cherry Hinton Chalk Pits SSSI and Beechwoods LNR and Gog Magogs Golf Course SSSI;

v. the early establishment of a generous landscaped edge to the southern side of the sites, including retention and enhancement of existing hedgerows, and creation of chalk grassland habitat linkages, to help create an appropriate buffer and distinctive city edge between the development, the Cherry Hinton Chalk Pit SSSI and the Cambridge Green Belt; and

Supporting text additions (para 3.111)

The Wildlife Trust has not at this stage suggested precise wording, however this paragraph (or an additional one) should include the justification for these developments to make an active and significant contribution towards the enhancement and creation of the Gog Magog Hills ecological network in line with the Cambridgeshire Green Infrastructure Strategy (2011), Cambridge Nature Conservation Strategy (2006) and NPPF paragraph 117. The additional wording could also acknowledge the positive changes that have occurred in recent years within the Gog Magogs Hills area (or local Nature Improvement Area, see below). Enhanced access has been created to Wandlebury Country Park and Cherry Hinton Chalk Pits, where calcareous grassland is also being restored, both through dedicated funding for green infrastructure improvements. There are further opportunities to enhance the farmland environment and to create new priority habitat linkages and enhanced access between the chalk grassland and other sites in this area.

Additional information to include in the Natural Environment section of the plan (section 7)

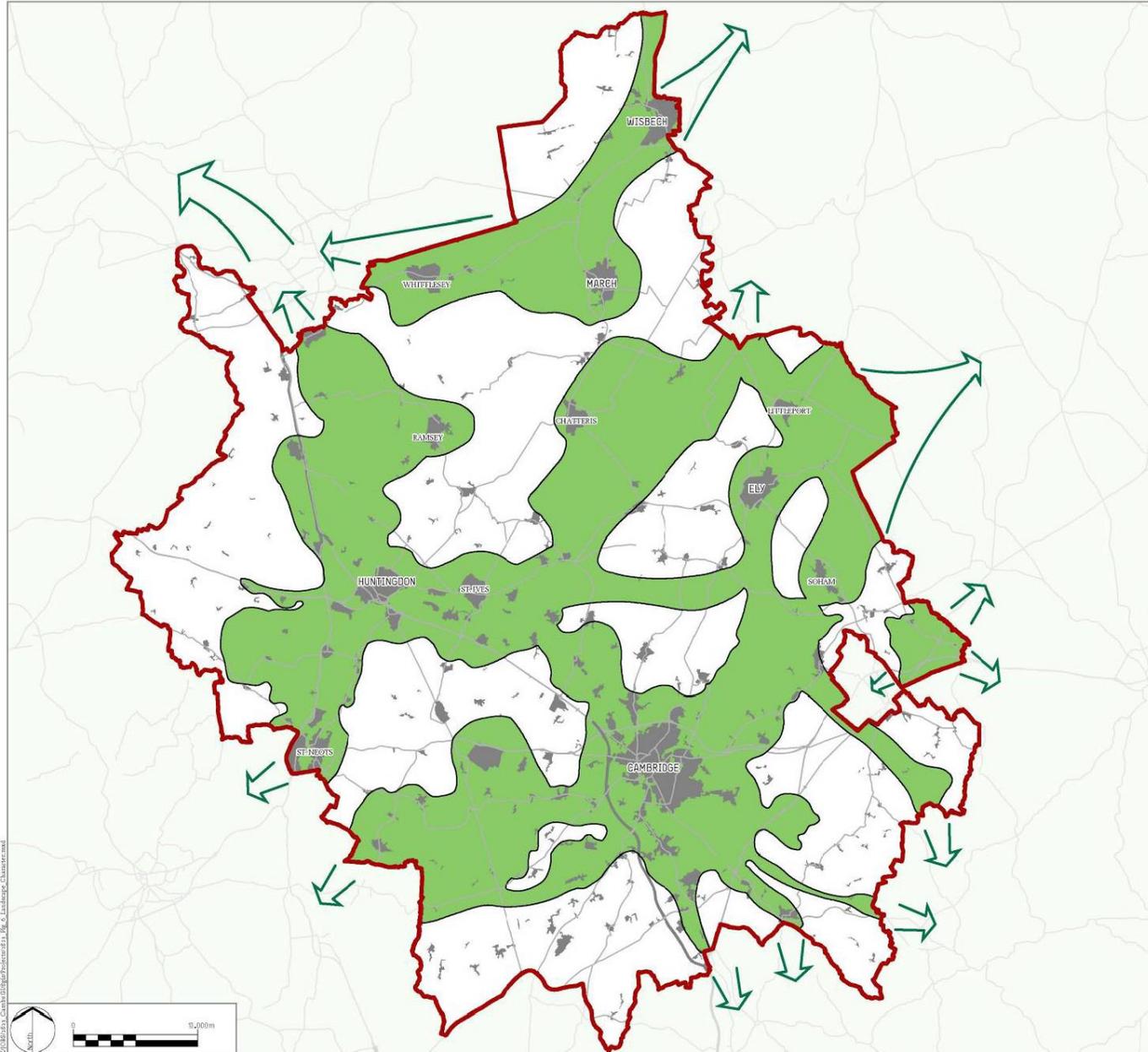
Specific wording is not suggested at this stage, however, the above wording changes need to be cross referenced with the natural environment section. The Wildlife Trust suggests that the City Council and South Cambridgeshire District Council identify the components of a local ecological network which would include the Gog Magogs Hills, the River Cam valley and possibly an area west of Cambridge around the Coton Countryside Reserve. [There are additional areas within South Cambridgeshire District, but these are not covered here as this session is looking at the Green Belt area covered by both the City and South Cambridgeshire]. The Wildlife Trust believes that the Gog Magogs Hills and River Cam should be identified as local Nature Improvement Areas and a specific new policy should be included in the Local Plan to promote positive landscape and biodiversity enhancements within these areas through the planning system.

References

- A Vascular Red Plant List for England*; P.A. Stroh¹, S.J. Leach², T.A. August³, K.J. Walker¹, D.A. Pearman¹, F.J. Rumsey⁴, C.A. Harrower³, M.F. Fay⁵, J.P. Martin², T. Pankhurst⁶, C.D. Preston³, I. Taylor²; BSBI (2014)
- Birds of Conservation Concern 3*; RSPB (2009)
- Cambridge Nature Conservation Strategy*; Cambridge City Council & The Wildlife Trust BCN (2006)
- Cambridgeshire Green Infrastructure Strategy*; Cambridgeshire Horizons (2011)
- Making Space for Nature: a review of England's wildlife sites and ecological network - Report to Defra*; Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.A., Tew, T.E., Varley, J., & Wynne, G.R. (2010)
- Section 41 List NERC Act (2006)*; Natural England (2007)
- State of Nature Report*; Collaboration between 25 UK conservation & research organisations, (2013)

Appendix 1: Extracts from Cambridgeshire Green Infrastructure Strategy Review (2011)

Figure 3-3: Cambridgeshire Strategic Green Infrastructure Network (Next page)



REV.	DESCRIPTION	APP. DATE
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LD&DESIGN

PROJECT TITLE
CAMBRIDGESHIRE GREEN INFRASTRUCTURE STRATEGY

DRAWING TITLE
Cambridgeshire Strategic Green Infrastructure Network

ISSUED BY	Oxford	T	01865 887050
DWG.NO	2823_11		
DATE	17/05/2011	DRAWN	DL
SCALE@A3	1:300,000	CHECKED	PL
STATUS	FINAL	APPROVED	IH

No dimensions are to be scaled from this drawing.
 All dimensions are to be checked on site.
 Area measurements for indicative purposes only.

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Sources: Ordnance Survey, Open Street Map, 2001 Census Area Data, Cambridgeshire County Council & Natural England.

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Cambridge Nature Conservation Strategy

The Cambridge Nature Conservation Strategy, adopted in 2006, provides a technical document to guide the nature conservation activities of all departments and partners across the City of Cambridge. The vision is that over 10 years (2006 to 2016) Cambridge will see a “net gain” in biodiversity, both within the city and its immediate hinterland. Wildlife will be protected, enhanced and where possible expanded and linked. Everyone who lives or works in Cambridge will have access to high quality natural green spaces within walking distance of their home or place of work, and there will be a greater awareness and understanding of biodiversity. Within the strategy, a number of actions and projects have been proposed covering:

- The designation of new Local Nature Reserves (LNRs).
- The favourable management of County and City Wildlife Sites.
- Restoration of Cambridge Commons and floodplain.
- Enhanced biodiversity management of public parks and open spaces.
- Improved public access to, interpretation and promotion of Cambridge’s natural Green Spaces.

Many of these actions are local in nature, whilst the majority of strategic schemes are already underway or are outlined in the Green Infrastructure Strategy as future projects, both in Cambridge and South Cambridgeshire. See also the Byron’s Pool case study on page 155, the River Cam Habitat and Access Enhancement case study on page 156 and the Coton Countryside Reserve case study on page 129.

Opportunities within the target area to inform future project development

Biodiversity: there are opportunities for enhanced management of and linkages between Cambridge’s commons and riverside meadows, including via green corridors to the wider countryside. Floodplain habitat restoration is also an excellent opportunity to improve biodiversity in the area. On the City fringes there are specific opportunities available, and several projects are being progressed including the Gog Magogs Countryside Project, Trumpington Meadows County Park and Byron’s Pool Local Nature Reserve. There are deficits in the existing levels of parkland habitat in the north of Cambridge and in Queen Edith’s ward.

Appendix 15, Pages 43 - 44: Extract from Projects for Target Area 6.3: Cambridge

Name of Project	Gog Magog Countryside Project
Summary of Project and Core Objectives	<p>Based on partnership working developed some years ago between Cambridge Past, Present & Future; the Wildlife Trust; Magog Trust; and local authorities, this project aims to protect and enhance the high quality landscape of the Gog Magog Hills just to the south of Cambridge. The vision is to provide an expanded and linked set of green infrastructure sites on the southern edge of Cambridge linking Cherry Hinton chalk pits to Wandlebury Country Park and Magog Down. The aims are to provide improved recreational areas including the existing country park at Wandlebury, to enhance biodiversity such as the restoration of Cherry Hinton chalk pits, and to provide new and improved access such as the new cycle route to Wandlebury and the opening up of East Pit. The project area is located close to major new urban extensions including Cambridge southern Fringe and Cambridge East and the area has the potential to become far more important in meeting the recreational needs of the new and existing communities of south and east Cambridge.</p>

Appendix 2 – Extracts from Cambridge Nature Conservation Strategy (2006)

6.7. CHALK GRASSLAND

Key Issues

6.7.1. While chalk grasslands have undergone a less dramatic decline than some other species-rich grassland, they have still none-the-less declined by an estimated 75-80%. The remaining areas of chalk grassland to the south of Cambridge survive on generally small, isolated sites. They are however close enough to be linked into either a chalk grassland network or a single large downland site. Such a “Countryside Enhancement Area” would provide a distinct landscape setting to the southern edge of Cambridge and provide a valuable strategic greenspace for existing and future residents of the city, as well as contribute significantly towards biodiversity targets. Because the area is in both Cambridge City and South Cambridgeshire District, and in multiple land ownership, a partnership approach to implementation would need to be adopted. The area is extremely well linked to the Cambridge Southern Fringe urban extension, as well as existing communities.

6.7.2. Several Nationally Scarce plant species occur on the chalk soils in Cambridge, including Moon Carrot *Seseli libanotis*, Grape-hyacinth *Muscari neglectum* and Yellow Vetchling *Lathyrus aphaca*.

Objectives

6.7.3. Increase the area of chalk grassland habitats (from approximately 5.88 ha) by creating new grassland to buffer, extend and link Cherry Hinton Pits SSSI, Lime Kiln Close LNR, Lime Kiln Reservoirs, Lime Kiln Hill RSV and Wort’s Causeway RSV. (These sites can also be linked to the Beechwoods LNR, Gog Magogs SSSI, Wandlebury Country Park and Magog Down, within South Cambridgeshire District).

6.7.4. Maintain stable or increasing populations of the Nationally Scarce plants species, Moon Carrot, Grape-hyacinth, Perennial Flax and Yellow Vetchling.

Actions:

CG1. Work with the private owners to develop Cherry Hinton East Pit into a high quality chalk grassland natural greenspace with safe access for the quiet enjoyment of nature.

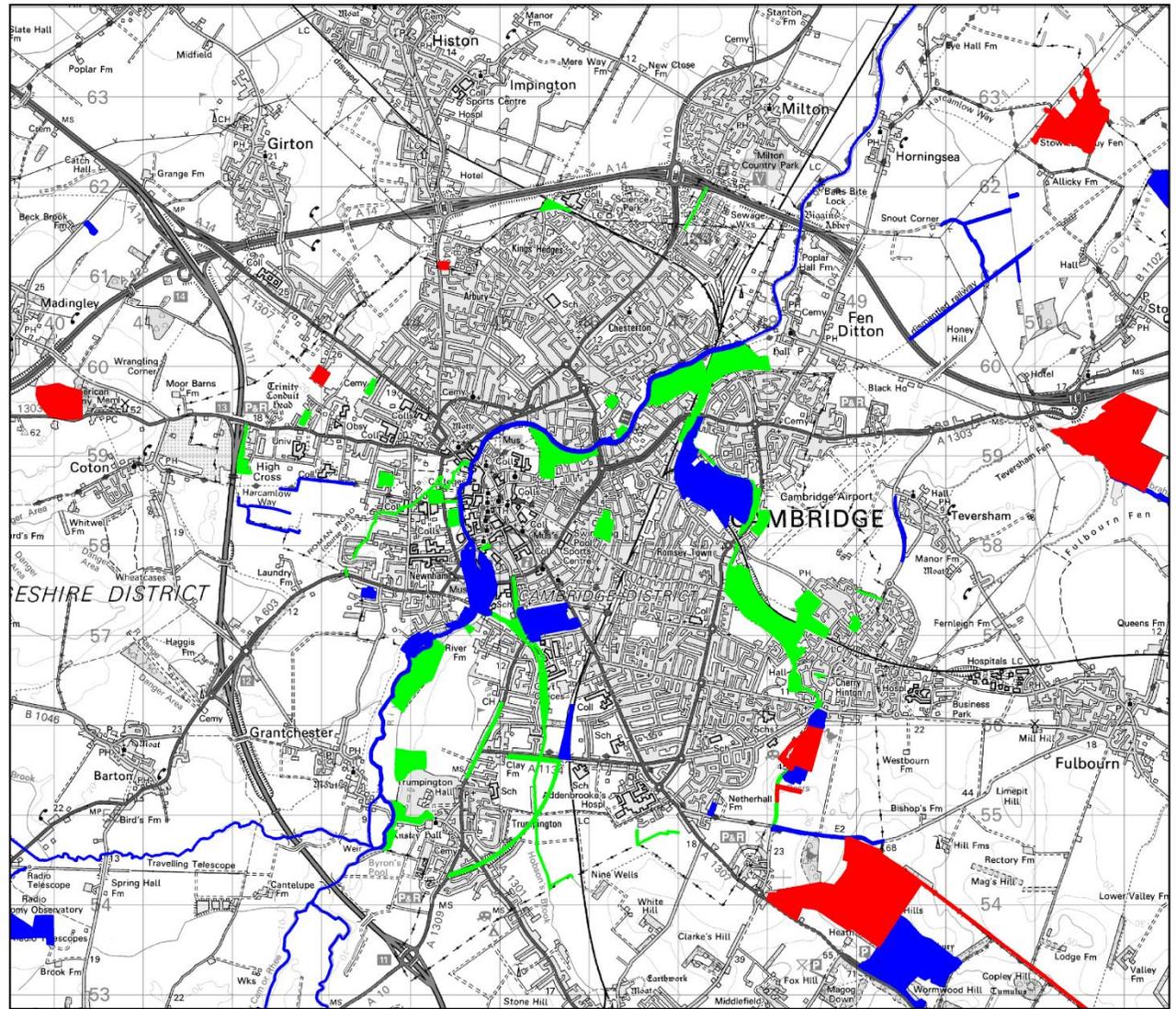
CG2. Implement a conservation management regime for Lime Kiln Hill SSSI road verge to maintain the populations of Moon Carrot and Grape-hyacinth and monitor their status and to Wort’s Causeway RSV to recover the population of Perennial Flax.

CG3. Through the University’s Ecology Strategy for the West Cambridge site, implement a conservation management regime for Coton Path Hedgerow CountyWS to maintain the population of Yellow Vetchling and monitor its status.

CG4. Seek to work with Netherhall School to establish a chalk grassland wildlife conservation area adjacent to Cherry Hinton Chalk Pits.

CG5. Establish a wider partnership to promote and implement the proposal for a “Gog Magogs Countryside Enhancement Area”, to provide a strategic open space on the southern edge of the city.

DESIGNATED NATURE CONSERVATION SITES

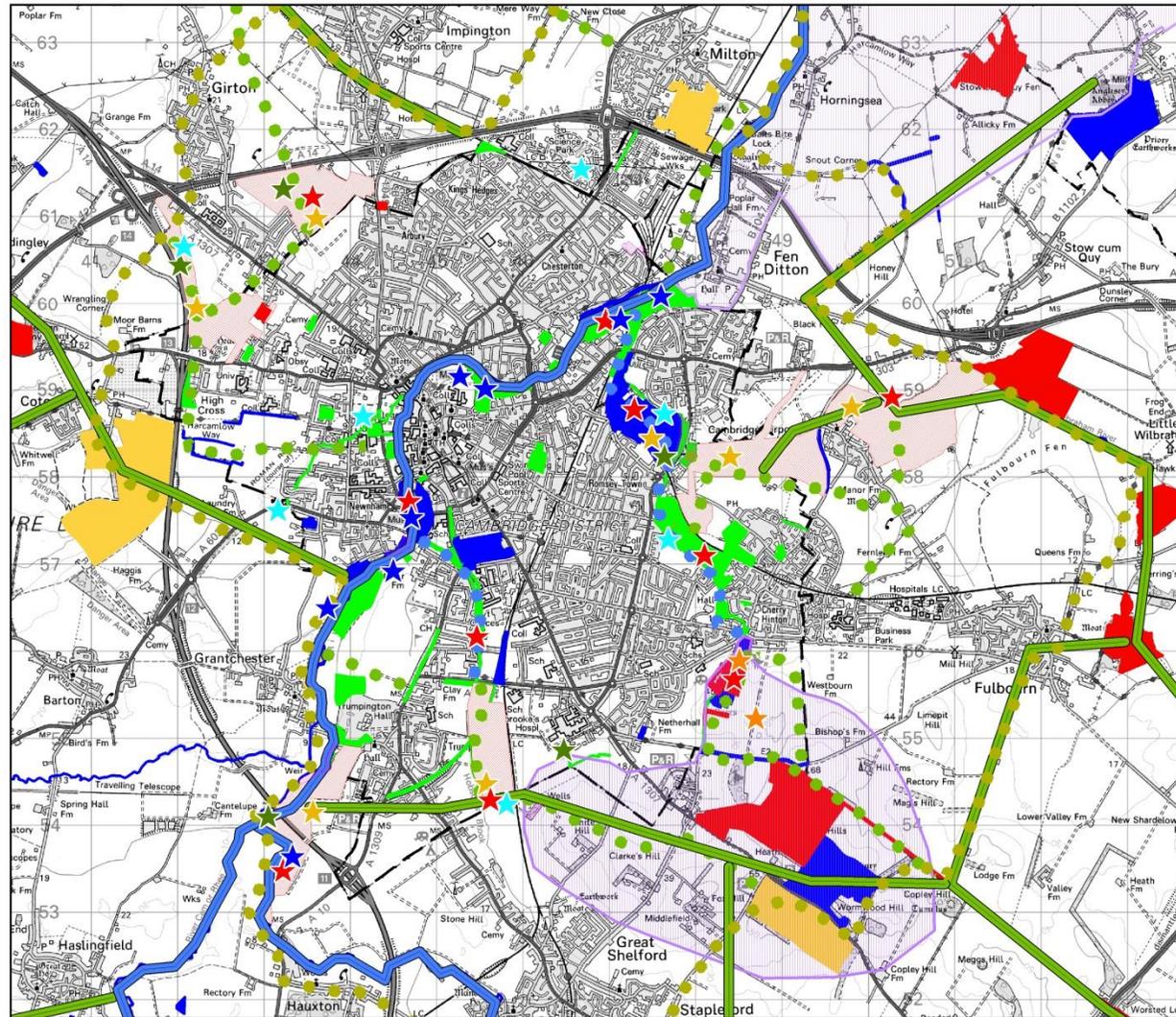


Key:

- SSSI
- SSSI
- County Wildlife Site
- County Wildlife Site
- City Wildlife Site
- City Wildlife Site

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OVERALL SPATIAL VISION



Key:

- ★ Chalk Grassland Sites
- ★ Wet Grassland Sites
- ★ Potential Local Nature Reserves
- ★ Neutral Grassland
- ★ Drainage Ditch Sites
- ★ Woodland Sites
- Other Strategic Open Space
- SSSI
- County Wildlife Sites
- County Wildlife Sites
- City Wildlife Sites
- City Wildlife Sites
- Local Nature Reserve
- Sub Regional Strategy - Green Corridor Enhancement
- Sub Regional Strategy - New Green Corridor
- Cambridge Orbital Recreation Route
- City Scale New Green Corridor
- City Scale Green Corridor Enhancement
- Proposed New Strategic Open Space
- Wicken Fen & Gog Magog Countryside Project
- District Boundary

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