Appendix A: Summaries of Representations and Responses – Biodiversity and green spaces Chapter

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Biodiversity and green spaces

Hyperlink for all comments

Open this hyperlink - <u>Biodiversity and green spaces</u> > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 68

Notes

Whilst the webpage linked above effectively included only general comments on the Biodiversity and Green Spaces theme, some comments attached to this webpage relate to specific biodiversity and green spaces policies. These comments have been moved to the specific policy. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

• PC= Parish Council DC= District Council TC= Town Council

Executive Summary

The majority of comments provide broad support for the objectives and priorities for improved biodiversity was expressed within the representations from a range of individuals, organisations and developers, with comments that policies must be as strong as can be to protect and enhance existing green spaces and networks. Comments included that the area has good green spaces which add to the rural character, are a huge asset and should be protected from development, but that there is pressure on green spaces, often conflict between recreational use of green spaces and biodiversity, and that sufficient land should be provided for both. It was suggested the Objectives should include the 'Doubling Nature' ambition. A small number of comments raised concern about the

environmental capacity of the area, suggesting that the aims of this theme would be challenging to deliver, and suggesting that the development strategy did not accord with those aims.

Table of Representations: Biodiversity and green spaces

Summary of issues raised in comments	Comments highlighting this issue
Support the objectives and priorities for improved biodiversity.	3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3
Cupport the objectives and phonties for improved bloarversity.	Individuals
	56820 (J Mead), 57674 (J Conroy)
	Public Bodies
	56912 (West Wickham PC), 57704 (Bassingbourn-cum- Kneesworth PC), 58421 (Linton PC), 59201 (Cambourne TC), 59919 (Fen Ditton PC)
	Other Organisations 58505 (University of Cambridge), 59168 (Cambridgeshire and Peterborough Clinical Commissioning Group)
	Developers, Housebuilders and Landowners
	58312 (Hallam Land Management Limited), 58705 (Church Commissioners for England)
RSPB supports general direction outlined. Objective should include doubling nature – councils have signed up to as part of the OxCamArc Environmental Principles.	59042 (RSPB Cambs/Beds/Herts Area)

Share and strongly support vision for biodiversity and green	58819 (CBC Limited, Cambridgeshire County Council and a
spaces. CBC's Vision 2050 shares Councils' determination to	private family trust)
achieve highest standards of development, to integrate and	
deliver biodiversity enhancement.	
Supports the aim. Aligns with one of our priorities (Strategy	58949 (National Trust)
2020-2025) to increase access to the outdoors, focusing on	
opportunities for people and nature to connect.	
Support the Aim. Policies must provide for protection and	57947 (E Davies)
enhancement of existing green spaces, networks and	
corridors, in urban areas, including provision for buffer zones.	
Greater emphasis & protection of these when plans are	59826 (Dry Drayton PC)
considered.	
Essential not only for the environment but also mental health.	58028 (Great and Little Chishill PC)
Support aim to ensure enhanced biodiversity resource, with	58489 (Marshall Group Properties)
new and better green spaces. Better for people and the	
environment. Ambitions for Cambridge East align, providing	
significant green infrastructure.	
Overall policy direction is supported and welcomed. Essential	58654 (Cambridge Past, Present & Future)
policies are as strong as can be. Prioritise the protection of	
existing sites, emphasising mitigation hierarchy to give a clear	
statement of intent for any future developments. Assess	
development / infrastructure proposals before incorporate into	
plan.	
Would like a plan proposing improvements along the lines	56824 (M Yeadon)
stated without necessarily waiting for any development	
proposals to come forward.	

Often conflict between recreational use of green spaces and	56889 (J Prince)
biodiversity. Green space is needed for people AND for	
wildlife. In areas of high density housing, sharing doesn't	
work.	
City and area have good green spaces. Should be protected	57252 (D Lott)
& not destroyed. No building on them, particularly in 2 mile	
radius of City centre. Most open spaces close to city have a	
rural touch and are a huge asset. Biodiversity could be	
broadened in some areas.	
South Cambridgeshire is a green agricultural space. Building	56729 (Croydon PC)
the odd park or nature reserve is no substitute.	
Infographic: no mention of Local Geological Sites or	57787 (R Nicholls)
Geological SSSI. A number of sites within area, designed to	
provide system of locally valued non-statutory sites	
(equivalent to Local Wildlife Sites but with wider remit).	
Many developments will build on and take away well-	59225 (Teversham PC)
established green open areas.	
Serious environmental capacity issues, particularly in relation	60195 (J Preston)
to intensification of pressures on green spaces.	
Though the plan notes the need for biodiversity and green	57525 (Stapleford PC), 59115 (Great Shelford PC),
spaces, it contradicts this position by allowing proposals to	
release areas of green belt for development. Green Belt has	
been and is proposed to be eroded, ultimately destroying our	
village status.	
Should be explicit requirement for green separation between	58303* (M Claridge)
communities. Without it there is a high probability of	
piecemeal ribbon development in all areas outside the Green	
Belt.	

Concerned about flooding. Need to retain quality farmland for food security. Rising sea levels is likely to result in the loss of the Fens. Moving the WWTC to the green belt to facilitate growth is contrary to the goals of the plan. Concerned about approach to BNG.	59460 (S Buckingham)
Need a balanced approach to ensure other aims of Plan (i.e. delivery of homes and jobs) are not overly restricted by aims of biodiversity and green space protection and enhancement.	58989 (Metro Property Unit Trust)
Monitoring needs to be in place to support this policy. Objectives and policy approach supported. Welcome recognition that development can support on and off-site enhancements and can protect and provide new green spaces for nature. Proposed site can deliver green infrastructure / biodiversity enhancements.	Developers, Housebuilders and Landowners 58017 (Imperial War Museum/Gonville and Caius College), 58596 (Endurance Estates – Caxton Gibbet Site), 58788 (Wates Developments Ltd), 58914 (Phase 2 Planning), 58965 (North Barton Road Landowners Group), 58992 (Jesus College, a private landowner and St John's College), 59086 (Grosvenor Britain & Ireland)
Disingenuous and lacking transparency to not mention the relocation of Cambridge Waste Water Treatment Plant to Green Belt, to unlock a brownfield site for development that was imagined for a living/working community prior to the effects of the global pandemic. Objection to CBC: detrimental to ecology, loss of green recreational space and opportunities for walking when increasing population, increasing risk of flooding, noise and disturbance to domestic properties, increasing congestion on campus for little proven benefit.	58069 (Horningsea PC) 57140 (A Barrett)

No comment	57386 (Huntingdonshire District Council)

BG/BG: Biodiversity and geodiversity

Hyperlink for all comments

Open this hyperlink - Policy BG/BG: Biodiversity and geodiversity > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 84

Note

Some representations included in this summary of representations table have been moved from the Homes heading and
also from the Biodiversity and Green Spaces theme chapter introduction section, as the comments were specific to
biodiversity and geodiversity. Representations which have been moved in this way are denoted with an asterisk in the
following format Representation number* (Name of respondent).

Abbreviations

• PC= Parish Council DC= District Council TC= Town Council

Executive Summary

Broad support for the policy principles was expressed within the representations from a range of individuals, organisations and developers, with comments including that preserving and enhancing biodiversity was important for health and wellbeing, carbon sequestration, place making, and benefits the economy. Comments suggested that the policy and objectives should be strengthened to guide development away from sensitive areas and refuse development that has adverse effects, and that buffer

zones are needed to protect wildlife beyond sites and create green corridors. Comments noted that the policy only relates to controlling the impact of developments not improving existing sites (which was considered a missed opportunity).

Many comments, particularly from related organisations, supported the proposal for 20% biodiversity net gain. Concerns were raised by some developers that the minimum 20% Biodiversity Net Gain (BNG) target was double the Environment Bill's proposed level of 10%, that it was not justified, too onerous and not achievable in all cases, and that there needs to be further consideration of viability and deliverability and flexibility to avoid stifling development. Some comments considered that the BNG approach can fail to deliver benefits if new ecosystems are substituted and green networks interrupted. Comments were received from developers promoting sites with the opportunity to deliver BNG. Other comments suggested that the 20% was not high enough, and a higher requirement should be included if doubling nature was to be achieved.

Concerns were raised by some individuals and community groups about how BNG will be calculated. Comments suggested a need for professionally accredited independent reports, and that the assessment should consider all important species, local and special characteristics, and adjoining nature sites.

Comments were expressed about off-site provision of biodiversity that the creation of larger networks will be beneficial to wildlife and support ecological resilience, that clear delivery mechanisms were required which could include purchasing credits, the need to

ensure developers deliver before occupation, and encouraging collaborative working with developers. Others commented that off-site provision might not provide benefits to local residents.

Table of representations: BG/BG: Biodiversity and geodiversity

Summary of issues raised in comments	Comments highlighting this issue
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Support for the policy principles, including

- Commitment to 20% BNG
- Recognition of need to address recreational impacts
- Increasing networks for wildlife and people
- Intention to control biodiversity impacts from development.
- TMLC have already delivered 46% at award winning Trumpington Meadows.
- Recognition of a strategic GC Green Infrastructure Network to encourage biodiversity enhancement
- Biodiversity crisis is severe and one of most affected areas in country due to pressure for development.
- Reverse the decline and loss.
- Welcome that Ox-Cam Arc Environmental Principals have informed the approach
- Wider environmental net gains
- Avoid impact to sites of biodiversity or geological importance
- Councils signed up to 20% BNG with Ox-Cam Arc ambition justified given low level of designated sites.

Individuals

56821 (J Mead), 58867 (B Lockyer), 60128 (C Blakeley),

Public Bodies

56623 (Gamlingay PC), 58422 (Linton PC), 59203 (Cambourne TC), 59306 (Cambridgeshire and Peterborough Combined Authority), 59694 (Central Bedfordshire Council),

Third Sector Organisations

57956 (North Newnham Residents Association), 60757 (Cambridge and South Cambridgeshire Green Parties)

Other Organisations

57007 (The Wildlife Trust), 58608 (University of Cambridge), 58931 (Woodland Trust), 59047 (RSPB Cambs/Beds/Herts Area), 59297 (National Trust), 59725 (Environment Agency), 59977 (Natural England), 60463 (Anglian Water Services Ltd),

Developers, Housebuilders and Landowners

57380 (Colegrove Estates), 57903 (Martin Grant Homes), 58499 (Marshall Group Properties), 58763 (Trumpington Meadows Land Company), 58828 (CBC Limited, Cambridgeshire County Council and a private family), 60223

Summary of issues raised in comments	Comments highlighting this issue
	(Thakeham Homes Ltd), 60314 (Gladman Developments), 60514 (Taylor Wimpey UK Ltd), 60552 (Thakeham Homes Ltd). 60571 (Countryside Properties – Fen Ditton site),
Policy should set minimum target based on evidence, legislation and national guidance.	58219 (Countryside Properties UK Ltd)
 Comments on the policy approach that: Need to ensure full assessment of impacts, mitigation and compensation, and address harmful developments All developments must contribute to Suitable Alternative Natural Greenspace. 	58675 (Cambridge Past, Present & Future)
Strongly support 20% BNG – Cambridgeshire is one of most nature depleted counties, doubling nature would only bring County to the UK average, Cambridge Nature report identified habitats too small and fragmented, some new habitats will produce less biodiversity than expected, needs to be 50% to achieve doubling nature.	58675 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
20% BNG is ambitious, realistic and welcomed. Lack of clarity on	59225* (Teversham PC)
procedures should overall progress fall short of target. Policy	
should prohibit off-site wherever possible to avoid loop holes with	
smaller developments to detriment of Parish/Neighbourhood	
Plans. Disappointing no locally defined metrics for assessing,	
including for developments encroaching on Green Belt.	
Recognition of recreational impact as a significant issue is	
welcome and should focus on proactive repair and maintenance.	
Preserving and enhancing biodiversity and green space is	57776 (Carbon Neutral Cambridge)
important for health and wellbeing, as well as carbon	
sequestration. Makes the region a pleasant place to live, and	
hence benefits the local economy.	
Support John Meed's suggestions for strengthening the	57943 (F Goodwille)
objectives of this policy [Attachment relates to John Meed's	
response to Policy BG/GI]	
Residential development should avoid adverse impact on natural	59987* (Natural England)
environment and deliver net gains for biodiversity in accordance	
with BG/BG.	

Summary of issues raised in comments

Concerns with the minimum 20% BNG target, including:

- Considered too onerous and not achievable in all cases.
- Environment Bill is 10%, should not seek to double.
- Further consideration needed of viability and deliverability.
- No evidence to justify need for 20%
- Expensive off-site contributions may be needed which would impact on design and viability of schemes
- Financial and operational implications should be considered in evidence base.
- Issue for all Local Authorities within Ox-Cam Arc. CBC keen to discuss how could be delivered and impacts this might have on site viability and delivery of key services and facilities.
- NEC Ecology Study (2020) recommended 10%
- Reword to aim for 20% with a minimum of 10% to be achieved

Comments highlighting this issue

57173 (Southern & Regional Developments Ltd), 57246 (European Property Venture – Cambridgeshire), 57380 (Colegrove Estates), 57385 (Persimmon Homes East Midlands), 57440 (Mission Street Ltd), 58357 (ARU), 58466 (Hill Residential Ltd and Chivers Farms – Hardington – Ltd), 58500 (BDW Homes Cambridgeshire & The Landowners – Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badcock & Ms Hartwell), 58582 (Croudace Homes), 58608 (University of Cambridge), 58787 (Wates Developments Ltd), 58793 (Wates Developments Ltd), 58864 (Abbey Properties Cambridgeshire Limited), 58953 (St John's College Cambridge), 58991 (Endurance Estates), 59124 (L&Q Estates Limited and Hill Residential Limited), 59694 (Central Bedfordshire Council), 60152 (U&I PLC and TOWN), 60159 (Home Builders Federation), 60314 (Gladman Developments), 60328 (Danial Bros Shefford Ltd), 60514 (Taylor Wimpey UK Ltd), 60571 (Countryside Properties – Fen Ditton site), 60583 (Martin Grant Homes), 60764 (U&I Group PLC)

Concerns about calculating BNG and using the DEFRA metric, including:

- BNG calculations can be fudged.
- Excessively simplistic only looking at habitat features, excluding species measurement.
- Species and 'local and special characteristics' need to be considered
- Does not include all important species, such as red listed swifts.
- Include specific wording on what other measures will be used to assess BNG – mentioning swift boxes and bat boxes.
- Realistic meaningful Preliminary Ecological Appraisals and BNG / mitigation proposals must be based on professionally accredited independent reports, within 1 year of application, cover 1km radius.
- Adjoining designated nature sites must be included in assessments.
- Revisit wording to accommodate changes to national metrics and biodiversity value
- Measurement should take account of adverse effects of general disturbance, noise, light and domestic animals.
- DEFRA metric 3.0 flawed, so should not be sole metric used.
- Value should be placed on longevity of new communities and associated new habitats designed to be retained in perpetuity.

56799 (A Laurie), 56821 (J Mead), 57068 (Fulbourn Swifts Group), 57134 (North Newnham Res. Ass), 57372 (P Heath), 57373 (P Heath), 57440 (Mission Street Ltd), 57591 (R Pargeter), 57814 (J Pavey), 57903 (Martin Grant Homes), 57936 (L Buchholz), 57967 (V Morrow), 59920 (Fen Ditton PC), 60332 (Newnham Residents Association)

Summary of issues raised in comments	Comments highlighting this issue
 Existing trees and hedgerows may be given high biodiversity value because of longevity, but it should be recognised older trees will eventually die. DEFRA's calculator 3.0 seems weighted in developer favour. 4 metrics – size, distinctiveness, condition and strategic habitat - very subjective and measured in difficult to understand way. Excludes 'connectivity'. Concerns about how biodiversity is to be measured in a valid manner Object to use of land use categories for biodiversity potential calculations if actual species diversity and scarcity is of known important. Not very sensitive to some important biodiversity considerations 	
BNG fails twice as often as it succeeds even with a lower bar of no net loss. Developers are judge, jury and executioner. On site off-setting will not encourage many forms of wildlife and prone to disturbance from trampling or dog fouling.	60241 (Federation of Cambridge Residents' Associations)
Research suggests that Biodiversity Net Gain policies and measurement systems are widely unsuccessful in achieving their stated aims.	57994* (Cambridge Doughnut Economics Action Group)
'Doubling nature', BNG and Natural Capital Accounting are being used as bargaining chips by developers – no development means no funding for nature.	60241 (Federation of Cambridge Residents' Associations)

Comments about BNG, including:

- Vague unless parish specific percentages and target for City
- Being used as ineffective compensation for irreplaceable loss of biodiversity and public amenity local to the development
- BNG is good goal but nowhere close to 'doubling nature'.
- BNG has to be realistically evaluated and monitored.
- Require evidence based BNG and funded management regimes for the development site, designated site and wider biodiversity area
- Should not permit development that adversely impacts biodiversity on neighbouring sites
- Need clearer provisions for protection of vulnerable sites from excessive numbers of visitors
- Target is double the national and SPD be confident that justification and impact of policy is fully evidenced, including viability.
- Wording on ancient woodland and ancient tree protection should reflect NPPF para 175c.
- Needs to align with upcoming Local Nature Recovery Strategy not just GI strategic objectives
- Be clear BNG is in addition to mitigation hierarchy (NPPF para 180)
- Recommend a natural capital evidence approach
- Recommend ambitious maintenance requirements, in perpetuity.

56623 (Gamlingay PC), 56799 (A Laurie), 56891 (J Prince), 57368 (P Heath), 57373 (P Heath), 57988 (J Hall), 58608 (University of Cambridge), 58708 (Church Commissioners for England), 58931 (Woodland Trust), 59047 (RSPB Cambs/Beds/Herts Area), 59725 (Environment Agency), 59977 (Natural England), 60128 (C Blakeley), 60196 (J Preston), 60463 (Anglian Water Services Ltd)

Summary of issues raised in comments	Comments highlighting this issue
Focus on area measures to restore ecological networks,	
enhance resilience and provide overall increase in natural habitat and ecological features	
 Projects proposed to help achieve net zero need to be 	
both delivered and safeguarded	
 Consider landscape scale connectivity BNG 	
Stress the importance of green space and biodiversity in	59203 (Cambourne TC)
Cambourne as part of the Western gateway GI corridor	
Baseline survey work will need to be sufficiently detailed to allow	56821 (J Mead)
rigorous assessment. Without it risk of missing important	
elements of ecosystem and failing to set accurate baseline.	
BNG calculations should be done by an accredited member of	58767* (J Shanklin)
CIEEM. Need to factor in that new sites will not support same	
range of biodiversity as established sites, and ecosystems take	
long time to establish.	
Policy more specific and onerous than OS21, so additional cost	57482 (ESFA – Department for Education)
(to public purse) to compliance, with knock-on effect to developer	
contributions. Work with CCC and providers to explore how the	
education estate might deliver BNG.	

Summary of issues raised in comments	Comments highlighting this issue
 No advantage for residents in local area in terms of biodiversity or connectivity. Questionable whether nationwide benefits would be delivered. Suggest developers are required to demonstrate BNG measures before occupation to incentivise BNG work. Need to provide a delivery mechanism for off-site projects, including for smaller projects Need a system similar to that for the District Licencing for Protected Species. LPA should work proactively, positively, and collaboratively with landowners and relevant bodies to bring off-site enhancement measures forward to ensure benefit to the community. Consider alternatives such as 'credits' being purchased from other donor sites in order to achieve appropriate levels. 	57936 (L Buchholz), 57995 (Cambridge Doughnut Economics Action Group), 58499 (Marshall Group Properties), 58864 (Abbey Properties Cambridgeshire Limited), 58928 (bpha), 59762 (Endurance Estates), 60571 (Countryside Properties - Fen Ditton site), 60764 (U&I Group PLC)
First Conversation consultation showed "very strong support for biodiversity net gain including use of off-site contributions" – I believe there was strong support for biodiversity net gain but would question if there is truly 'strong support' for off-site contributions.	57936 (L Buchholz)

Summary of issues raised in comments	Comments highlighting this issue
Summary of issues raised in comments	Comments ingringrang this issue
How will GCSP ensure net gain offsetting targets are met due to	59846 (Waterbeach PC)
the accelerated growth of WNT? How will it be monitored and	
manage to obtain "net gain".	
Please include the Wildlife Trust's proposals for a Cambridge	59495* (D Seilly)
Nature Network in the Local Plan	
Policy should provide for establishing areas of "Important Natural	57821 (J Pavey)
Habitats" covering areas locally identified for wildlife / biodiversity	
value, which do not enjoy designated status. Would help	
proactively inform development decisions thereby avoiding	
introducing cost and delay when proposals are met with	
objections based on a site's high wildlife value. Requirements for	
designating INH would need to be tightly defined. Would	
complement but not conflict with designations under policy	
BG/PO.	
Welcome GI initiatives identified so far. Can help inform Local	59725 (Environment Agency)
Nature Recovery Strategy in identifying valuable sites,	
sustainable land management and how loss/fragmentation of	
habitats should be avoided. Creation of larger networks will be	
beneficial to wildlife and support ecological resilience.	
Assessment in Greater Cambridge Chalk Stream Project ignores	58085* (Fulbourn Forum for community action), 58774*
opportunity to enhance streams and water courses, which could	(Wilbraham River Protection Society)
have a significant effect in increasing biodiversity.	

Summary of issues raised in comments	Comments highlighting this issue
Surrounding land forms are part of and support biodiversity of	56799 (A Laurie), 56821 (J Mead), 56891 (J Prince), 57134
designated sites. Need buffer zones (of set depth) within which	(North Newnham Res. Ass), 57368 (P Heath), 57373 (P
no development is allowed to protect wildlife or habitats beyond	Heath), 57950 (E Davies)
the site and create green corridors.	
Whilst off-site provision can offer value, concerned it is an easy	56821 (J Mead)
opt out for developers, and justification for planners to remove	
land from Green Belt. Need clarity on Objective 3 - who would	
agree it, with what consultation and when in the process. Amend	
Objective 2 to Include additional wording on near-site	
improvement on adjoining land.	
Strengthen policy wording to 'will not be permitted'. Where	57134 (North Newnham Res. Ass)
development is permitted, biodiversity, tranquillity, light, air,	
noise, amenity must measure 20% BNG across all affected sites.	
Replacement is not like for like and liable to deliver net loss if	57368 (P Heath)
new ecosystems are substituted for established ones and green	
networks are interrupted.	
Development management: need for pre-app discussions and	57372 (P Heath)
early site visits to ensure all parties aware of site's characteristics	
and protection requirements.	
First priority must be protection and conservation of existing	58675 (Cambridge Past, Present & Future)
biodiversity and geodiversity interests. All development should	
be subject to thorough assessment of impacts. Mitigation	
hierarchy should be followed with proof it will work. Secure	
mitigation and compensation in perpetuity.	

Summary of issues raised in comments	Comments highlighting this issue
Cambridgeshire has few nationally designated sites but many locally designated sites. More detail needed on how to measure and mitigate impacts on local sites.	58675 (Cambridge Past, Present & Future)
Enable wildlife sites and open spaces to be formally registered in name, so they can be on neighbour notification list.	57372 (P Heath)
No specific mention of ponds; can have significant beneficial effect on biodiversity.	57591 (R Pargeter)
Grateful to see the importance of geodiversity has been noted. Local Geological Site should have same protection and force as Local Wildlife Sites. There are a number of Geological Sites (SSSI and LGS) within the area.	57788 (R Nichols)
Using "Where Possible" says you are not serious and gives potential developers the option to not do it as it does not say "Must".	57810 (Histon and Impington PC)
Even where 20% BNG is demonstrated development should not be permitted if any nationally or locally designated species of concern will suffer loss of habitat or population impairment unless credible alternative habitat is provided, translocations undertaken if appropriate and funding secured for long-term protection & site maintenance is secured.	57814 (J Pavey)

Summary of issues raised in comments	Comments highlighting this issue
•	
Be clearer that biodiversity objectives are about controlling	57936 (L Buchholz)
development impacts, not improving biodiversity on existing	
sites. 20% gain is only being sought if nature is damaged as part	
of development on new sites. Policy will "seek wider	
environmental net gains" so perhaps there are greater ambitions	
- should be spelled out. Missed opportunity to set goals for	
increasing biodiversity overall.	
Policies must protect and enhance existing green spaces and	57956 (North Newnham Residents Association)
corridors in urban areas, especially adjacent to areas of major	
development. Developers underplay negative impacts such as	
loss of open space, effects of hard surfaces etc. Increasing	
green spaces for people is a necessary counter.	
Refuse development that has adverse effects. More clarity	58675 (Cambridge Past, Present & Future)
needed on exceptions where public health benefits significantly	
outweigh.	
BNG must take account of full value of an affected site including	58675 (Cambridge Past, Present & Future)
any deliberate damage prior to development.	
Planning conditions must secure effective long-term	58675 (Cambridge Past, Present & Future)
management and monitoring.	
BNG conditions should include developer funds for monitoring	60003 (Steeple Morden PC), 60081 (Guilden Morden PC)
and remedial action if required.	
Adopting a green-washing approach to biodiversity. Best to leave	59580 (Campaign to Protect Rural England)
natural environment undeveloped in its natural state. Take steps	
to improve biodiversity of unbuilt land with appropriate planting	
and management.	

Summary of issues raised in comments	Comments highlighting this issue
Recommend policy acknowledges significance of invasive non-	59725 (Environment Agency)
native species impacts on wildlife and environment.	
Recognise the hierarchy of international, nationally and locally	59977 (Natural England)
designated sites. Accompany with map of existing ecological	
network and enhancement opportunity areas to guide	
development away from sensitive areas and deliver BNG.	
Creation of winter wet areas, water space and Suds designed to	60128 (C Blakeley)
benefit enhanced biodiversity should be planned into	
developments at an early stage	
Incorporate flexibility to achieve required BNG requirements by	60223 (Thakeham Homes Ltd), 60552 (Thakeham Homes
measures most appropriate to that site, including off-site, to	Ltd)
ensure do not stifle development.	
Clarity needed on what the concept of doubling nature means	60241 (Federation of Cambridge Residents' Associations)
and how will it be measured.	
Natural Capital Accounting is an untested concept. Monetary	60241 (Federation of Cambridge Residents' Associations)
assessment of ecosystem services and stocks is inadequate and	
used to trade away environmental for economic assets with	
greater yield.	
Dasgupta defines wealth as sum of natural, human and	60241 (Federation of Cambridge Residents' Associations)
economic capitals and yields, and sustainability as the condition	
where this sum is either stable or increasing. Request Local Plan	
adopts Dasgupta definition of sustainability, not NPPF's false	
definition of 'sustainability', especially the false or under-valuation	
of natural capital.	

Summary of issues raised in comments	Comments highlighting this issue
Give great prominence to green networks and allow for damage	60332 (Newnham Residents Association)
to designated sites from adjacent development	
Outputs must be 'sense-checked' by qualified ecologists.	60757 (Cambridge and South Cambridgeshire Green Parties)
Concerns policy allowing off-setting off-site. New habitats	
created need explicit protection from development in perpetuity.	
Need strong statement that existing designated sites (with	
national or local designation) remain protected and undeveloped.	
Avoid noise and light pollution near biodiversity due to negative	56486* (A Coghlan)
impacts. Do not propose 20% net gain in locations where wildlife	
will not thrive. Developers reduce biodiversity baseline. More	
consistency needed between developments to provide and	
encourage more biodiversity.	
Litter along roads and hedges must impact wildlife – developers	56486* (A Coghlan)
should contribute to litter clean-up fund.	
Note the ambitious target for 20% net gain. Support ambitions	57205* (Abrdn), 57271* (Universities Superannuation
but this is double the target in Biodiversity SPD and national	Scheme – Commercial), 58206* (Universities Superannuation
target. Should be proportionate to the potential of specific sites,	Scheme – Retail)
recognising the limited potential on brownfield sites.	

Summary of issues raised in comments	Comments highlighting this issue
Welcome requirement for net gain. Metrics take no account of disturbance factors. An interconnected distribution of havens remote from severe disturbance should be maintained. Ditches	57590* (R Pargeter)
and hedgerows are important and should be protected. Business developments have greater potential for net gain as less	
disturbance, particularly outside working hours, and no domestic	
animals. Important sufficient space is set aside within such developments.	
Support ambition for 20% BNG. Challenging to deliver given other constraints. Need clear mechanism for off-site provision,	58494* (Marshall Group Properties)
including directing it to locations where it will provide most value. Want to engage with GCSP on developing this mechanism.	
Policy should include minimum 50m buffer zones around all designated sites. Opportunity for BNG through Environmental Land Management Schemes, particularly for sites which currently have no buffer protection.	58757* (J Shanklin), 58761* (J Shanklin)
Any offsetting area needs to have a management plan and funding to enable that management to be carried out.	58775* (J Shanklin)
Metrics should consider all species of conservation concern, including rare and threatened species, not just protected.	58781* (J Shanklin)
Require surveys within last 5 years. Also consider overall habitat which may support a range of species that are not of individual significance.	58783* (J Shanklin)

Summary of issues raised in comments	Comments highlighting this issue
Amenity grassland can cover a wide variation from a	58785* (J Shanklin)
monoculture of hard-wearing grass to species rich that is only	
apparent during periods such as "no mow May". Often lawns of	
older properties retain many species that persist from when the	
lawn was created.	
Biodiversity should be integrated into the whole landscape and	59069* (Cambridge Sustainable Food CIC)
should be included in all new developments, for example	
bee-friendly plantings,	
• wild flower meadows,	
tree planting and space for woodland	
fruit trees in public spaces	
Local composting facilities	
Space for wetlands – ponds, lakes and rivers	
Insects are essential to all larger animals - Cambridge should	56486* (A Coghlan)
become a pesticide free town.	
No mention of pressure from the significant number of large	59225* (Teversham PC)
housing developments on chalk stream network. Major omission	
that needs addressing. Disappointing not see to see any	
quantitative targets in this section.	
Policy being contravened by allowing industrial scale	57475 (C Martin)
development on Green Belt at Honey Hill. Lighting, construction	
traffic will disturb wildlife. Contamination risks to Quy Fen SSSI	
and flood risk being minimised by developer. BNG is	
meaningless. Wicken Fen Vision will be compromised.	

Summary of issues raised in comments	Comments highlighting this issue
Any plan which does not include Honey Hill is a fake plan. Please tell the truth.	57536 (A Martin)
Support 20% BNG and seek to achieve at Cambridge East, onsite but off-site provision will also be required. Need for clearly identified mechanisms for achieving off-site BNG. Engage with GCSP.	58499 (Marshall Group Properties)
Proposing new habitat credit site at Steeple Morden to be available for off-setting BNG.	59741 (Henley Real Estate Developments Ltd)
Promoting site for development with opportunity to deliver BNG.	58219 (Countryside Properties UK Ltd), 58763 (Trumpington Meadows Land Company), 58787 (Wates Developments Ltd), 58828 (CBC Limited, Cambridgeshire County Council and a private family), 59762 (Endurance Estates)
University's Biodiversity Action Plan has vision to improve biodiversity on University estate and Greater Cambridge area to educate, inspire appreciation and encourages interventions,	58608 (University of Cambridge)
research and innovation.	
No comment	57390 (Huntingdonshire District Council)

BG/GI: Green infrastructure

Hyperlink for all comments

Open this hyperlink - Policy BG/GI: Green infrastructure > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 87

Note

• Some representations included in this summary of representations table have been moved from the Homes heading as the comments were specific to green infrastructure. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number* (Name of respondent).

Abbreviations

• PC= Parish Council DC= District Council TC= Town Council

Executive Summary

Broad support for the policy intention was expressed within the representations from a range of individuals, organisations and developers, with comments that multi-functional, connected, green infrastructure is a key part of a successful spatial strategy.

Comments also included that the policy direction was good but ambiguous and needed clarification, including how it relates to other Aims and policies within the Plan and to Natural England's Accessible Natural Greenspace Standards. Comments that green infrastructure doesn't respect boundaries, encouraging partnership working, and the need for clear funding mechanisms for delivery.

Some developers commented that the policy should be a recommendation not a requirement, should recognise some sites may not be able to deliver due to locational constraints, site size and viability, that development should not be opposed where reasonable steps have been taken to protect and incorporate GI. Some comments from individuals expressed concern how the policy would be delivered via the planning process to ensure contributions will invest in strategic initiatives, and that the policy approach did not include a standard for measurement or achieved performance of developments.

There was widespread support for the green infrastructure initiatives, with many comments about specific initiatives including suggested amendments to their boundaries, joining up with other initiatives such as National Trust's Wicken Fen Vision, and proposing other ecological measures for inclusion.

Comments suggested the policy should consider the additional recreational pressure arising from developments, encourage increased access to green spaces through joining up spaces, and that all homes without gardens must have easy access. Comments included that the policy lacked specific proposals for improving public access and connectivity, including for horse riding.

Table of representations: BG/GI: Green infrastructure

Summary of issues raised in comments	Comments highlighting this issue
Support for the policy	58425 (Linton PC), 60404 (Great and Little Chishill PC)
Supportive of the green infrastructure strategy, minimising land use	59482* (Shepreth PC)
for development.	
Strongly support this policy. As a Parish with several disconnected	56913 (Cllr D Sargeant, West Wickham PC)
woodland areas would like to highlight the importance of linking	
natural habitats with diverse hedgerows or belts of trees.	
Support approach and need for clear requirements for new	59054 (RSPB Cambs/Beds/Herts Area)
development to support GI infrastructure provision. Accessibility and	
locational relationship of development to GI strategic areas should be	
a key consideration.	
Identification of 14 strategic green infrastructure initiatives will assist	58679* (Vistry Group and RH Topham & Sons Ltd)
delivery of Environment Bill mandatory 10% minimum biodiversity net	
gain where on-site provision cannot reach this level.	
Strongly support policy. Welcome inclusion of 14 strategic GI priority	57008 (The Wildlife Trust)
areas and themes. Provision of significant strategic natural	
greenspace is essential and will need significant funding through new	
development. Use of Suitable Alternative Natural Greenspace	
standard at 8 Ha / 1000 population is a good start. Open space	
standards (BG/PO and BG/EO) woefully inadequate without	
corresponding strategic GI provision.	
Support policy. Two strategic GI initiatives append important	57392 (Huntingdonshire DC)
landscape character areas in Huntingdonshire; Areas 5 & 8. Area 8 -	
suggest working together to protect and promote interconnectedness	
between the woodlands.	

Summary of issues raised in comments	Comments highlighting this issue
Support ambitious targets for green infrastructure provision. Marshall	58506 (Marshall Group Properties)
is developing ambitious plans that provides a high value biodiversity	
resource. Proposes to make green infrastructure multi-functional.	
Keen to enhance Eastern Fens. Would welcome Plan requiring all, or	
at least developments of a significant scale, to seek green	
infrastructure accreditation, for example through Building with Nature	
scheme.	
Support policy intention for development proposals to include green	58614 (University of Cambridge)
infrastructure, providing benefits for people, wildlife and planet.	
Support intent of policy, reference to Cambridgeshire Nature Network	58690 (Cambridge Past, Present & Future)
and adoption of standards for provision of GI. Protection of existing	
sites should be first priority. Support requirement for financial	
contribution, where cannot be provided on-site, to support existing	
and create new areas off-site. Would like to discuss Opportunity	
Mapping report.	
Supports objective to enhance existing green infrastructure network	58766 (Trumpington Meadows Land Company)
and address how development proposals can link with green	
infrastructure. Aim for all development to include green infrastructure	
is beneficial for people of Greater Cambridge.	
'Trumpington South' is surrounded by extensive green infrastructure,	
includes 150 acre Country Park and River Cam corridor, to North	
West. Propose potential expansion by further 33%. Management	
could be integrated with Country Park.	

Summary of issues raised in comments	Comments highlighting this issue
Green infrastructure is a key part of a successful spatial strategy.	58959 (St John's College Cambridge)
Welcome identification of Strategic Green Infrastructure Initiatives,	
and the statement that "Explicitly identifying these initiatives and their	
objectives in the Local Plan will not restrict development in the broad	
areas they cover." Engagement with landowners in the identified	
areas will be essential.	
Support the principle of the Strategic Green Infrastructure Initiatives	59296 (National Trust)
and policy which requires delivery of on-site greenspace in new	
developments.	
Support policy to require all development to include green	59726 (Environment Agency)
infrastructure and protect/enhance water environments. Welcome list	
of initiatives. We consider 'connectivity' a key component; support	
references to 'providing links' and connecting wider ecological	
network. Existing habitats and green spaces within development	
footprints should be protected and incorporated where possible.	
Welcome the comprehensive approach in developing the GI evidence	59978 (Natural England)
base, including Opportunity Mapping and identification of 14 Strategic	
GI initiatives. Multifunctional benefits of GI are fully recognised, as	
well as links between GI provision and delivery of other strategic	
policy areas including wider natural environment, sustainable	
transport and social inclusion. These threads/links should continue	
through future drafts to ensure the value of GI for people and natural	
environment is fully reflected. Clear value in having funding	
mechanisms and a recognised GI standard in place.	

Summary of issues raised in comments	Comments highlighting this issue
Support identification of 14 strategic GI initiatives and enhancing	60127 (C Blakeley)
linkages between GI and open spaces to provide corridors for wildlife.	
Support use of a GI standard, particularly on larger developments. In	
particular early identification of GI and biodiversity assets and	
potential gains as an early part of design process and/or planning	
brief.	
One of the key policies; identifies existing green infrastructure network	60280 (Commercial Estates Group)
and strategic initiatives intended to enhance it and addresses how	
development proposals should relate to green infrastructure. CEG	
fully support Councils' aims and ambitions in this regard. Policy	
should encourage increasing access to green spaces through a joined	
up green infrastructure approach.	
Support BG/GI seeking to protect and expand green (and blue?)	60471 (Anglian Water Services Ltd)
infrastructure which benefits people, wildlife, and the planet.	
Support for recognition of Pollinator corridors. Strategic Green	60004 (Steeple Morden PC), 60082 (Guilden Morden
Infrastructure should include protection and enhancement of chalk	PC)
aquifer spring line.	
We support the policy to protect and improve chalk streams.	57706 (Bassingbourn-cum-Kneesworth PC)
Welcome focus of Policy and support objectives and proposals.	56822 (J Meed)
Initiative 3 - need to improve biodiversity of arable land across an	
important area of chalk farmland. Initiative 14 is lighter on content	
than others; problematic and have suggested ways could be	
strengthened through additional objectives.	

Summary of issues raised in comments	Comments highlighting this issue
Supports requirement for new developments to include GI and	56975 & 56976 (Trumpington Residents Association)
emphasis on River Cam corridor and Gog Magog hills and chalkland	
fringe. Stress importance of maintaining and improving Hobson's	
Brook/Vicar's Brook Green Corridor. Increase investment in assets	
such as Trumpington Meadows Country Park and Hobson's Park and	
protect them from development. Concern about water demand and	
risk to River Cam and Hobson's Brook from Nine Wells.	
Any development at S/CBC/A detrimental to well-being of existing	57952 (F Goodwille), 58171 (S Kennedy)
Queen Edith's residents. Policy should protect Nine Wells Nature	
Reserve, already under stress and being gradually degraded. Field	
between NWNR and railway line should be allocated for protection	
and enhancement.	
Policy needs greater coherence as proposals and sites are not linked	58155 (H Thomas)
by an overarching policy that makes them ecologically contiguous.	
Existing green infrastructures around Babraham (unlinked) need to be	
more ecologically coherent and given greater protection. No 3 Gog	
Magog should extend to A11 to protect valuable riparian forest and	
flood plain habitats, include river (i.e. link with no1), as Granta	
tributary is over abstracted and being managed in a piecemeal	
fashion.	
Area 4 is described as Enhancement of the eastern fens. Appears to	57514 (Save Honey Hill Group), 57619 (J Pratt)
contradict proposed CWWTP relocation to that area. Policy requires	
new development to help deliver or support delivery of GI strategic	
initiative objectives. Putting development on an area of Green Belt	
contradicts this principle.	

Summary of issues raised in comments	Comments highlighting this issue
Supported: Note S/NEC Policy will impact on aspirations for	57675 (J Conroy)
Enhancement of Eastern Fens GI as a result of required relocation of	
CWWTP to fulfil S/NEC policy identified as Honey Hill.	
Principle of enhancing existing green infrastructure is supported but	58133 (M Asplin)
clarity is required regarding proposed relocation of Waste Water	
treatment Works to green belt, which appears to conflict with Area 4,	
Enhancement of Eastern Fens.	
Contradicting policy by allowing CWWTP to be rebuilt in Area 4, an	59160 (C Martin)
area intended to be enhanced, and part of Wicken Fen Vision. Will	
also compromise River Cam corridor.	
'Enhancement of the Eastern Fens' initiative should be extended to	59296 (National Trust)
include Wicken Fen vision. One of key delivery programmes for	
Natural Cambridgeshire 'doubling nature' vision. Green infrastructure	
is a cross boundary issue and initiatives should not stop at local	
authority boundaries. Acknowledge that delivery would require	
partnership working. By thinking across boundaries, we can create a	
network of greenspaces. National Trust committed to enhancing	
urban green spaces and linking access to countryside to create 20	
green corridors (by 2030); identified Wicken Fen to Cambridge.	
Unfortunate the Opportunity Mapping Final Report unavailable. North	57806 (J Pavey)
Cambridge Green Space should cover area south west of Histon -	
four woodlands with high levels of community use (two designated in	
Neighbourhood Plan); also meadows. Footpaths have high use for	
amenity. Opportunity to contribute to doubling nature.	

Summary of issues raised in comments	Comments highlighting this issue
Barton Road Riffle Range falls within Strategic Initiative 7. Would introduce constraints and potential incompatible uses that could place unreasonable restrictions on how MOD use the land. Strongly recommend boundary is amended.	57480 (Defence Infrastructure Organisation – MOD)
Couldn't see detail of maps. Essential policies and map identify the importance of green infrastructure provided by network of linked green spaces in West Cambridge, unique to the setting of city, for green wildlife corridor they provide. Policies need wording to 'Reinforce and enhance landscape and townscape'.	57954 (E Davies)
It is paramount Grantchester meadows be included as an integral part of Cambs green infrastructure. Has been left out of W Cambridge GI Buffer Zone. Create a conservation covenant across the Grantchester Meadow area to mitigate impacts of high pressure from recreational visitors; lack of public transport, no parking, no management of litter are directly damaging environment.	60488 (Grantchester PC)
The section will achieve the aim of the plan and should be supported. The importance of existing green space and biodiversity in Cambourne should be stressed especially as Cambourne is part of the Western gateway multifunctional green infrastructure corridor.	59205 (Cambourne TC)
Purpose of policy should be strategic and Western Gateway Multifunctional Green Infrastructure Corridor should be focused on strategic developments at Cambourne and Bourn Airfield. Support Western Gateway proposal. Consider extending boundary to cover whole of parish up to Central Bedfordshire border.	56484 (V Chapman), 56493 (D & B Searle), 56502 (W Grain), 56520 (RJ & JS Millard) 56568 & 56624 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
Map shows Land at St Peter's Street being within Western Gateway	58733 (R Grain)
Multifunctional Green Infrastructure Corridor (WGMGIC) (8).	
WGMGIC covers a large area of land and should be focused on large	
strategic developments at Cambourne and Bourn Airfield.	
Unreasonable to cover the whole of Caxton.	
National Trust's Wimpole Estate falls within Western Gateway and	59315 (National Trust)
two pollinator corridors. Welcome discussions about working together	
to deliver greater connectivity to these spaces. We also fulfil 11, 13	
and 14 of the dispersed green infrastructure initiatives and are keen to	
engage with partners.	
Policy highlights areas considered appropriate for green infrastructure	60587 (Martin Grant Homes)
initiatives. With regards to promotion of land in Coton, area 7 (West	
Cambridge green infrastructure buffer – Coton Corridor) is relevant to	
land at Silverdale Close given it washes over the site. Policy should	
be drafted so as not to inhibit development within these areas and set	
out potential requirements to be included within such development.	
Strategic Initiative No 8: recommend extend to include Orwell Clunch	57127* (M Gould), 58451* (Orwell PC)
pit and village. Collaboration with landowners could improve planting,	
providing a corridor for wildlife.	
Area 8 - policy misses out half of Gamlingay ward which will create	60366 (Gamlingay PC)
problems; excludes protected green sites at The Heath and The	
Cinques. Scope for cross border projects enhancing Acid Heath,	
stretches west to Potton and Sandy. (Gamlingay is part of The	
Greensand Ridge which has funding for enhancement work as part of	
Greensand Country). Gamlingay is in River Ivel catchment.	

Summary of issues raised in comments	Comments highlighting this issue
Only refers to cycling and walking not horse riding - discriminatory.	56698 (British Horse Society)
Roman Road at Babraham is not a footpath. Good ideas regarding	
health and wellbeing. Supports protection of bridleways for soft	
surface users. Essential public access, links and enhancements to	
PROW and green spaces built into development conception not an	
afterthought. Urban greening and de-paving supports protection of	
rural grass paths.	
It appears our bid (GO23) has not been properly considered in LUC	59759* (Foxton PC)
work, and subsequently the strategic GI map and policy. Included in	
Neighbourhood Plan policies.	
Call for Green Sites submission (Ref 53032) has not been properly	57437 (Foxton PC)
considered. Superb opportunity to create new chalkland habitat, open	
to informal recreation, with enhanced hedgerows and woodland	
management.	
Yes, but do not provide concrete busways or cycle lanes that disfigure	56712 (Croydon PC)
the landscape.	
Honey Hill is not mentioned. It will be destroyed if WWTP is moved, it	57500 (A Martin)
goes against principle of doubling nature and net biodiversity gain.	
You can't have one without consequences of other.	
Appraisal Scoping Report flagged risk associated specifically from	57135 (North Newnham Res. Ass)
phosphates and nitrates arising from development, agriculture and	
GARDENS. Use of chemical herb / pesticide, fertiliser in domestic	
gardens adjoining nature reserves should be accounted for in BNG	
and long term management to reduce pollution and impacts on flora	
and fauna and insects.	

Summary of issues raised in comments	Comments highlighting this issue
Policy appears more specific and onerous than OS21, but strategic outcomes are same. Request a degree of flexibility and pragmatism.	57483 (ESFA – Department for Education)
Should be a recommendation not a requirement. Developments	57095 (C King), 57297 (C Sawyer Nutt), 59152
should not be opposed where all reasonable steps have been taken	(Endurance Estates), 60288 (Wheatley Group
to protect and incorporate green infrastructure. Useful to include	Developments Ltd), 60339 & 60350 (FC Butler Trust),
further guidance in an SPD.	60361 (HJ Molton Settlement), 60373 (The Critchley
	Family), 60378 (S & J Graves), 60388 (D Wright), 60470
	(P, J & M Crow)
It is definitely worth using an objective and professionally respected	57593 (R Pargeter)
scheme to judge plans and proposals, and to measure performance.	
Include protection of Geodiversity; many Strategic GI areas have	57790 (R Nicholls)
geological dimension. Developers should be encouraged to facilitate	
any request from a suitably qualified group to view results of	
groundworks to identify and record any potential geological features	
exposed prior to them being covered / destroyed.	
Some developments will have no gardens particularly urban areas. All	57811 (Histon & Impington PC)
homes with no gardens MUST have recreation space within a 5	
minute (for example) walk.	
Policy should include specific reference to implementation of	57816 (J Pavey)
government's objective of protecting 30% of land for nature by 2030.	
It should embrace "wildbelt designation" concept in Wildlife Trust's	
"Planning A new way forward"	

Summary of issues raised in comments	Comments highlighting this issue
Strongly support increase in green infrastructure. Question how this	57937 (L Buchholz)
will be embedded and upheld in the planning process. NEC falls short	
of ANGST standards. Wiggle room for allowing development which	
could overwhelm creation of new GI. Worry developers will opt for off-	
site benefits - how can we be sure contributions will invest in strategic	
initiative areas.	
Green infrastructure is a good idea, especially in terms of creating	57970 (V Morrow)
wildlife corridors. How does plan meet Natural England's Accessible	
Greenspace Standards in terms of 100 hectares of greenspace for	
(for example) Northeast Cambridge?	
There is no absolute standard for measurement or achieved	57997 (Cambridge Doughnut Economics Action Group)
performance of developments.	
Council has agreed with Natural England to prepare a mitigation	58681 (North Hertfordshire DC)
strategy for Therfield Heath SSSI, west of Royston. Additional	
recreational pressures arising from developments, particularly within	
SSSI Zones of Influence will need to be considered in the future.	
Policy should recognise that some sites, given locational constraints,	58994 (Metro Property Unit Trust)
especially within City, may not be able to deliver enhancements	
envisaged and may not be viable.	
Policy requirement for all new development to help deliver or	59171 (Silverley Properties)
contribute to support delivery of the green infrastructure strategic	
initiative objectives. Policy conflicts with paragraph 57 of NPPF	
(planning obligations), particularly for small scale developments.	
Wording should be amended to reference major developments.	

Summary of issues raised in comments	Comments highlighting this issue
Consider how to work with private landowners to create more food	59238 (D Fox)
growing spaces in central Cambridge (where allotment demand is	
greatest), bearing in mind two colleges already provide small	
allotments on outskirts of city.	
Broadly welcome policy on Green Infrastructure; reference to	59672 (Historic England)
reinforcing and enhancing landscape and townscape; consider the	
role it can play in conserving and enhancing historic environment.	
Helpful to highlight important synergy between historic and natural	
environment. Maintenance of spaces should also be considered to	
ensure remain high quality places. Landscape Character Assessment	
and Historic Landscape Characterisation should be used to inform	
future GI plans.	
Comments included were:	59713 (Caldecote PC)
Green space and more diversity	
Comments included were:	59714 (Caldecote PC)
Farming community to [be] consulted.	
Waterbeach parish abuts Green Belt, green open space and river	59845 (Waterbeach PC)
Cam corridor. Extremely important that designated and other	
protected areas be enhanced and not a means to compensate for	
lack of green space in high density settlements such as Cambridge	
North Eastern Fringe development. Important to protect abundant	
biodiversity and habitat in the parish. WPC request this matter is	
treated as a priority if development is accelerated in WNT and GC	
area.	

Summary of issues raised in comments	Comments highlighting this issue
Broadly supportive but again concern that this is too general a concept that requires further precision.	59921 (Fen Ditton PC)
Green infrastructure appears extensively mapped and broad areas for projects identified. GI is a cross boundary matter as ecosystems do not stop at administrative boundaries; policies should enable development of green infrastructure across boundaries where relevant. Recommended the plan takes a positive stance towards contributing to aims of statutory Nature Recovery Strategies established by Environment Act 2021. While await secondary legislation to specify details, policies could still take a positive stance towards them pre-emptively.	59956 (Suffolk Council)
We fully recognise the benefits of open spaces as key aspect of the environment; fundamental to the character of an area. More conservation management staff are needed. Riparian pasture is essential to future of our green spaces. Tree planting and appropriate species selection is important, but greatest losses of habitat have been lowland florally rich grassland. This is a more appropriate target for river corridors than extensive tree planting.	60177 (Cam Valley Forum)
Flawed that green infrastructure and historic environment are considered separately. A holistic approach is essential – see NPPF definition of the historic environment.	60197 (J Preston)

Summary of issues raised in comments	Comments highlighting this issue
Need to identify a clear list of projects for NMU routes and public	60495 (Cambridge Local Access Forum)
access which development should fund. Proposals are extremely	
vague and do not focus on specifics. They are well-meaning but	
toothless and we will finish up without ANY much-needed schemes	
being built into the Plan	
Primary concern is lack of specific proposals for improving access	59842 (Cambridge Group of Ramblers)
and connectivity for people on foot, away from traffic. No areas are	
identified for safeguarding open space as access land. Does not	
address funding of paths and open access. Propose a list of	
proposals for inclusion.	
Policy wording states all development proposals will include green	60515 (Taylor Wimpey UK Ltd), 60572 (Countryside
infrastructure appropriate to its type, scale and location. Further	Properties – Fen Ditton site)
clarification should be provided to avoid any ambiguity.	
Policy is good but direction is ambiguous in explanation; needs	60759 (Cambridge and South Cambridgeshire Green
clarification to avoid misinterpretation. Policy should clearly relate to	Parties)
Great Places/Climate Change. Unclear interaction with open space	
standards in BG/EO. Strongly advocate specific targets for provision	
of GI. Clarify that provision of green space should respect the Natural	
England Accessible Natural Greenspace Standards. Support that	
development should meet GI Standard in Building with Nature.	
Support list of strategic GI initiatives, Expanding Greater Cambridge's	
'urban forest'. Pleased to see Allotments and Community Gardening	
listed.	
Residential development should contribute towards delivery of	59987* (Natural England)
Strategic Green Infrastructure initiatives.	

Summary of issues raised in comments	Comments highlighting this issue
Active site allocations for green infrastructure should be made on the	56622* (Gamlingay PC)
same scale as allocating land for housing/business/employment	
development.	
Need clarity on Biodiversity and Green Spaces Topic Paper and	56820* (J Mead)
Greater Cambridge Green Infrastructure Opportunity Mapping.	
Recommend the objectives in supporting documents be included	
within local plan to give them more weight.	
Policy needs to recognise that dogs are not compatible with	58764* (J Shanklin)
biodiversity. Some sites need to be designated as dog free, others will	
need limited public access.	
Positive to see policy explore proposal for all significant developments	59225* (Teversham PC)
to align to the Building With Nature standard. Will strengthen the	
framework for protecting green spaces identified in local	
neighbourhood plans, for example.	
Not justified to reject the alternative approach to restrict development	59225* (Teversham PC)
within respective GI strategic areas on the basis that these areas are	
too broad. To redress the balance wherein the value of GI is greater	
than that of new developments, the policy should be to define the	
strategic areas more specifically.	

BG/TC: Improving Tree Canopy Cover and the Tree Population

Hyperlink for all comments

Open this hyperlink - <u>Policy BG/TC: Improving Tree Canopy Cover and the Tree Population</u> > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 43

Abbreviations

• PC= Parish Council DC= District Council TC= Town Council

Executive Summary

There was broad support for the objectives and priorities for improving tree canopy cover and tree population was expressed within the representations from a range of individuals, organisations and developers, noting the existing low level of tree cover in Cambridgeshire, with comments that policies must be robust to protect trees and to deliver enhancements through development. Comments were made proposing specific tree canopy cover requirements on all new development, with the inclusion of ongoing maintenance, and replacement of trees when felled. Comments noted the importance of planting the right tree species in the right

location. Comments were expressed by one parish that a community forest or strategic plan is needed with allocated sites within the district, linking existing ancient woodland habitats, providing wildlife corridors.

Concerns from some developers on the wording stated the policy was contradictory stating both that "all trees should be protected" and "only trees of value should be protected", and that policy detail is vague and did not provide details on when its applied. Additionally, there were requests for policy flexibility on tree removal due to disease, age or safety concerns. Further responses requested a more flexible approach applied to the policy, balancing priority for tree planting with provision of sustainable development, suggesting an explicit policy direction toward "trees of value" rather than blanket protection and balancing tree removal against the benefits of bringing development forward.

Table of Representations: BG/TC Improving Tree Canopy Cover and the Tree Population

Summary of issues raised in comments	Comments highlighting this issue
Summary of issues raised in comments	Comments highlighting this issue

Support/ Strongly Support Policy:

- Objective 3, as relevant to improving the farmed landscape of Greater Cambridge.
- Objective should be strengthened about how achieved in practice
- Policy should be a requirement in all new development.
- establish specific requirements for tree canopy cover in new development areas and set targets for improving tree populations in the rest of the city.
- need to develop and maintain the tree/hedge network, and surrounding land
- Importance of maintaining trees once planted in new developments
- Include irrigation and maintenance of areas and trees
- Ensure additional tree cover is in suitable locations and provision of species resilient to anticipated climate change.
- should be recognised in some locations other habitats have priority over trees.
- current depletion of the chalk aquifer with dry summers adversely affecting tree health, mostly conifers. In favour of proposals like Cambridge Great Park.
- Policy inclusion of tree canopy, enhance river corridors, and protect and enhance open spaces. Include robust policy to deliver enhancements through development ensuring achievement of multi-functional benefits for climate change, biodiversity, water quality, access and green infrastructure. Tree planting needs to be targeted in appropriate locations and considered in the context of wider plans for nature recovery, not simply planting of trees and protecting / enhancing soils, particularly peat soils.
- Support, especially enhanced protection to existing mature trees.
- Support opportunity for rural field margins of agricultural land helping increase linkages, biodiversity gains and in specific places the creation of woodland belts in open countryside, green belt land and around villages.
- Urban areas, with existing trees there's need to plan replacement with adaptation

Individuals

56693 (J Meed), 57676 (J Conroy), 57939 (L Buchholz), 57971 (V Morrow), 58924 (A Sykes), 60129 (C Blakeley).

Public Bodies

56730 (Croydon PC), 57302 (Foxton PC), 57394 (Huntingdonshire District Council), 58426 (Linton PC), 60005 (Steeple Morden PC), 60083 (Guilden Morden PC).

Third Sector Organisations

56977 (Trumpington Residents Association), 58618 (University of Cambridge), 58698 (Cambridge Past Present and Future).

Other Organisations

57014 (The Wildlife Trust), 59979 (Natural England), 60761 (Cambridge and South Cambridgeshire Green Parties)

Developers, Housebuilders and Landowners

59765 (Endurance Estates).

Summary of issues raised in comments	Comments highlighting this issue
species to gradually adapt to a changing climate.	
 provide sufficient future tree cover to mitigate the urban heat island effect, 	
provide shade and mitigate microclimatic effects.	
Would require that best practices followed.	
protect existing hedgerows and supporting surrounding land.	57136 (North Newnham Residents
Plant new hedgerows/trees where appropriate	Association)
Improve maintenance by hedge owners, reduce spraying and incorrect cutting.	
Hedges recognised as character of an area, streetscape or public realm in	
Conservation areas, cannot be removed for more parking of cars, bins or cycles.	
Wooden or metal fencing not viable substitutes for natural hedges.	
The policy addresses aims contained in the vision.	59206 (Cambourne TC)
Forestry Commission report on the vital importance of improving, enhancing,	60211 (JV Neal)
protecting and preserving tree cover. This must be delivered everywhere in and	
around Cambridge, but especially where tree canopy cover falls below the meagre	
average for our area.	
Where trees felled or hedgerows removed, they should be replaced.	57707 (Bassingbourn-cum-Kneesworth
Policy should recognise, preserve and protect Forestry Commission Woodland	PC)
Priority Habitat Network, Natural England Priority Habitat Network Woodland and	
Natural England National Forest Inventory.	
This is a priority, and a proper evolving plan needs to be put in place	60405 (Great and Little Chishill PC)
Welcome the policy direction to "provide sufficient space above and below ground	60761 (Cambridge and South
for trees and other vegetation to mature". Strongly support that the first five bullet	Cambridgeshire Green Parties)
points are about "protecting" existing trees on a development site.	
Cambridgeshire has low woodland compared to other counties – would be great	56486* (A Coghlan)
value to create managed broadleaf woodlands near Cambridge.	

Summary of issues raised in comments	Comments highlighting this issue
Be mandatory that already approved plans plant many trees on site. Include roads	57252* (D Lott)
that are redeveloped, eg. Histon and Milton Roads. Consult & encourage residents	
to contribute to cost of planting more trees if funding an issue.	
Strategic plan required:	56625 (Gamlingay PC)
 community forest/strategic plan needed, with allocated sites for tree belts/mini forests within the district. 	
 propose necklace of mini forests surrounding parish linking existing ancient woodland habitats, providing wildlife corridors (8 Western Gateway area). 	
 More weight to be given to environmental benefits of Tree Protection Orders (TPO). 	57594 (R Pargeter)
• Hedgerows around developments should be protected from 'sanitisation', and	
wherever possible occasional trees along hedgerows should be preserved or replaced	
• Funding and compensation needed to enable 'Farmland near Balsham Wood' as	
a GI site.	
• refer to use of native species (local provenance) for tree/hedge planting, subject	57818 (J Pavey)
to viability due to climate change.	
 plant scrub species recognising important habitat for farmland birds. 	
• be clear woodland species not always appropriate nor desirable.	
Beneficial to increase tree and woodland cover, but care should be taken	57905 (Martin Grant Homes)
determining how/if this approach is consistent with maximising net biodiversity	
gains	

Summary of issues raised in comments	Comments highlighting this issue
Should be an objective measure for tree canopy cover, a method of measurement.	57998 (Cambridge Doughnut Economics
Forestry Commission suggest urban targets of 20% canopy cover in its website:	Action Group)
https://www.forestresearch.gov.uk/tools-and-resources/fthr/tree-canopy-cover-	
leaflet/	
Tree planting and additional tree canopy is extremely important, the policy should	58162 (H Thomas)
avoid cheap, poorly planned tree planting, wrong species planted in the wrong	
places, be consistent with the local ecological conditions and place emphasis to	
recover and restore existing woodland areas.	
Tree and hedgerow planting are fundamental part of the Cambridge East proposals	58509 (Marshall Group Properties)
including the green corridor, developed areas (including street trees), and carbon	
sequestration elsewhere in Cambridgeshire. Trees within the airfield occur rarely,	
there is significant potential for major gain.	
Supports the provision of new woodland within landscape lead masterplans for new	58770 (Trumpington Meadows Land
development, Trumpington South being a significant opportunity for this.	Company)
Apply policy to the S/EOC/GB2 development to maintain the green hedgerow and	57815 (D Lister)
tree lined footpath along Worts Causeway.	
Right tree right place	59057 (RSPB Cambs/Beds/Herts Area)
Poor tree canopy cover across Cambridgeshire – target of 19% is welcome.	59225* (Teversham PC)
Disappointing not see to see more recent re-evaluation of wet woodland in	
evidence base. Greater need for targets to align to BNG and TC target. Need	
greater emphasis on improving quality and diversity.	
Agree tree cover is an important issue and have taken advantage of some of the	57525* (Stapleford PC)
tree offers that have been around. Fail to see that Chalk Hills will support planting of	
numerous trees in our near area. Wandlebury have strong policy for tree planting	
and maintenance, moving towards meeting this need in our area.	

Summary of issues raised in comments	Comments highlighting this issue
Support but feel the policy should be stronger in encouraging provision of new woodland of locally appropriate species. Sees real opportunities in the south west of the area to create some great woodland, such as West Cambs Hundreds and towards Wimpole as per Cambridge Nature Network plans.	59070 (National Trust)
 Requests more flexible approach applied to policy on trees. Need to balance priority for tree planting with provision of sustainable development, tree protection should not be at the expense of the provision of housing. 	57174 (Southern & Regional Development Ltd), 57247 (European Properties Ventures (Cambridgeshire))
Policy detail is vague and does not provide details on when it will apply	60585 (Martin Grant Homes)
Site specific constraints and other policy directions in emerging Plan, to allow the most efficient and sustainable development of sites. policy direction to be explicit that 'trees of value' should be protected as opposed to the blanket protection of all tree cover on sites.	59003 (Metro Property Unit Trust)
 current policy direction somewhat contradictory: one bullet states all trees should be protected; another suggests only trees of value should be protected consider introducing additional flexibility allowing for instances of trees removal due to disease, age or safety concerns Consider the removal of trees, in whole or part, in order for development to be brought forward; loss should be weighed against the benefits of the proposals Questions necessity or justification of stipulating a tool such as iTree. 	59528 (Countryside Properties - Bourn Airfield), 60516 (Taylor Wimpey UK Ltd.), 60573 (Countryside Properties – Fen Ditton Site),
In managing the trees and hedgerows around the existing Milton WRC (as well as other sites) and looking to make significant provision as part of CWWTPR as shown by our Consultation, we have provided a good starting point for the development of the site through the NE Cambridge allocation	60464 (Anglia Water Services Ltd.)

BG/RC: River Corridors

Hyperlink for all comments

Open this hyperlink - <u>Policy BG/RC: River corridorshttps://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-first-proposals/explore-theme/biodiversity-and-green-spaces/policy-1</u> > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 39

Notes

• Some comments attached to this section relate to development strategy, climate change and specific site policies. These comments are presented at the end of the section. Where appropriate we will review placement of these comments in the final version of these representation summaries which will accompany the draft plan.

Abbreviations

• PC= Parish Council DC= District Council TC= Town Council PROWs: Public Rights of Way

Executive Summary

Broad support for the policy direction was expressed within the representations from a range of individuals, public bodies, organisations and developers, in particular for policy to both manage development on and require development to conserve and enhance the River Cam corridor (with comment this is particularly important due to the corridor's role in the wider cityscape). Support for policy to protect/enhance/and restore natural features, and to support re-naturalisation. Comments that natural flood

management techniques should be encouraged and comment that large schemes which improve water quality or tackle flooding should have assumption in favour of development within plan.

Some comments suggested the policy direction is too general and needs more precision, including a clear definition to ensure it is enforceable. Comments included that the policy, and wider draft plan, should recognise the river corridor as an important heritage asset as well as an environmental asset, and consider townscape impacts including overshadowing by tall buildings. There was comment that there is need for integrated policy approach encompassing water resources, water quality, flood risk and recognising the role of green infrastructure. Some comments were made in support of the need to balance tourism, improving people's access to high quality green spaces and multiple uses of the river (and its corridor) whilst protecting the river environment and wildlife. Anglian Water proposed that they and the two Councils enter into a Memorandum of Understanding to support the landscape scale integrated water management case for new strategic water supply provision.

Other comments suggested the that the policy approach be extended to explicitly include: chalk streams (including those around Fulbourn and Great Wilbraham), the river Great Ouse Corridor, the Ivel tributary and Ivel drainage board area and brooks from the aquifer spring line, the Wilbraham River, the Rhee, the Granta and surrounding woodland around Babraham, and that protection of upper Cam valley should extend into Uttlesford.

Table of Representations: GB/RC River Corridors

Summary of issues raised in comments	Comments highlighting this issue
Broad support for policy.	
	Individuals
	56690 (J Meed), 58134 (M Asplin), 58157 (H Thomas), 58932 (A Sykes),
	Public Bodies
	56626 (Gamlingay PC), 58427 (Linton PC), 59922 (Fen Ditton PC), 60006 (Steeple Morden PC), 60084 (Guilden Morden PC),
	Third Sector Organisations
	56978 (Trumpington RA), 58736 (Cambridge Past, Present & Future), 60176 (Cam Valley Forum), 60766 (Cambridge and South Cambridgeshire Green Parties)
	Other Organisations
	57013 (The Wildlife Trust), 59058 (RSPB Cambs/Beds/Herts), 59673 (Historic England), 60446 (Anglian Water Services Ltd),
	Developers, Housebuilders and Landowners
	58513 (Marshall Group Properties)

Summary of issues raised in comments	Comments highlighting this issue
A policy to manage development that has an impact on river corridors and proposes to protect, enhance and restore natural features, supporting re-naturalisation is particularly important for Cambridge due to the role the following play in managing flood risk and provision of habitats: • Chalk Streams	59727 (Environment Agency)
Chalk StreamsRole of RiversFloodplains	
Support policy which protects river corridors by ensuring 'the location, scale and design of development, protects and enhances the character, visual amenity and historic significance of river corridors and connected locations, including in particular considering views to and from rivers'.	56510 (C Martin), 56731(Croydon PC), 57945 (L Buchholz), 57974 (V Morrow), 60130 (C Blakeley)
Rivers need protecting and enhancing	60406 (Great and Little Chishill PC)
Policy should include provision of appropriate setback of developments from rivers to provide sufficient space for flood waters as well as safeguarding the integrity of the riverbanks and the development itself. This is needed as rivers, unless they have been artificially straightened, move through their landscapes through natural processes of erosion and deposition. Although river migration occurs over long time periods, developments should be set back generously to account for this alongside climate change	59727 (Environment Agency)
Need to balance tourism with protecting river environment (noting need to work with landowners).	56978 (Trumpington RA)

Summary of issues raised in comments	Comments highlighting this issue
Plan should not only include River Cam corridor (including south of city) and its tributaries but should also: • reference the Ivel tributary and Ivel Drainage Board area • enhance tributaries, for example Hobson's Brook • recognise the Wilbraham River as part of the River Cam corridor (see Submission Draft of the Fulbourn NP) • note that Steeple Morden has important tributary (The	56626 (Gamlingay PC), 56978 (Trumpington RA), 57071 (Fulbourn Swifts Group) 60006 (Steeple Morden PC)
Rhee) from river Cam which flows through parish	F720C (Hunting donahira DC) F00F0 (DCDD Comba/Dada/Harta)
Suggest the policy approach be extended to include the River Great Ouse Corridor (which passes through northern edge of plan area).	57396 (Huntingdonshire DC), 59058 (RSPB Cambs/Beds/Herts)
Under the Duty to Cooperate with Uttlesford DC protection of	57931 (Ickleton PC)
the upper Cam valley should extend into that District.	
Support the protection and restoration of the chalk aquifer	56826 (A Sykes) ,57071 (Fulbourn Swifts Group)
and related chalk streams.	

Summary of issues raised in comments	Comments highlighting this issue
 Need to not overlook both: the chalk streams around Fulbourn and Great Wilbraham that feed Little Wilbraham River (which flows into Quy Water and into the river Cam) as they support significant biodiversity within Fulbourn Fen Nature Reserve (SSSI). The drainage ditches to the east of Fulbourn which connect to the Little Wilbraham River (which flows past SSSI at Wilbraham Common) as this SSSI also supports significant biodiversity and in turn feeds reed bed at Wilbraham fen. These chalk streams and the Wilbraham River should be recognised as part of the River Cam corridor south east of Cambridge. 	57071 (Fulbourn Swifts Group)
Policy should be broadened to explicitly include chalk streams and it should apply to nearby developments (i.e Biomedical Campus/Hobson's Brook nearby and adjoining).	58932 (A Sykes)

Summary of issues raised in comments	Comments highlighting this issue
 Ensure appropriate support is given for projects to renaturalise: sections of River Great Ouse, protect floodplains and ensure that any nearby development protects and enhances the character of the river corridor. the Cam by restoring flood plains and habitats, for example at Logan's Meadow, Stourbridge and Jesus Green. Such Projects should be prioritised because of their potential to benefit wildlife and water quality while helping reduce flood risk. 	57396 (Huntingdonshire DC), 60766 (Cambridge and South Cambridgeshire Green Parties)
Policy should include recognition enhancement and protection for the brooks which emanate from the aquifer spring line and help feed the river system	60006 (Steeple Morden PC)

Summary of issues raised in comments	Comments highlighting this issue
Previously urged the planning designation of 'Riverscape Opportunity Areas' (via 2020 Green Infrastructure consultation response) extending at least 50 metres each side of the main rivers, streams and brooks within Greater Cambridge. Aim for these areas to encourage natural processes e.g. buffering watercourses (full list of aims included in full rep). Suggest four opportunities which should be sought within 'Riverscape Opportunity Areas': • Vary mowing regimes in urban parks • Reintroduce meadow species on urban commons/parks • Recreate scrapes and ditches on riverine commons in Cambridge • Create further inlets and ponds to create new water habitats	60176 (Cam Valley Forum)

Summary of issues raised in comments	Comments highlighting this issue
 Policy is flawed as: Only references walkers and Cyclists Should reference horse riding as definition of Active travel in CPCA Local Transport Plan includes it alongside cycling/waking 	56700 (British Horse Society)
 Contrary to the Equalities Act as majority of horse riders female Cambridgeshire Rights of Way Improvement Plan states bridleway is fragmented, inadequate and in need of improvement 	
 Contribution to Cambridgeshire Local Economy by equestrians is £100 million pa and a safe bridleway network supports this industry 	
Support the goal of improving people's access to high quality green spaces, but care must be taken that multiple uses of the river and its corridor do not threaten its environmental value. The possible damage to vital habitats by high numbers of visitors is recognised in the evidence document; Greater Cambridge Green Infrastructure Opportunity Mapping (2020)	60766 (Cambridge and South Cambridgeshire Green Parties)
If linkages are made which increase recreational pressure on nearby recreational and tourism locations, it may be wise to ask for impact assessments to address any adverse effects in relation to increased recreational pressure.	57396 (Huntingdonshire DC)

Summary of issues raised in comments	Comments highlighting this issue
Policy should both recognize the Forestry Commission Keeping Rivers Cool areas (of which some of the areas proposed for development are in) and it should seek to mitigate the impact of development on water temperature.	57708 (Bassingbourn-cum-Kneesworth PC)
Support policies to control development that impacts the River Cam, especially with regard to protecting habitat and revitalizing chalk streams (both from a biodiversity and an over-abstraction of water point of view).	57945 (L Buchholz)
How do high rise blocks, (example under development is Novotel at Cambridge North Station), 'enhance visual amenity'?	59774 (V Morrow)
What plans are there to mitigate the effects of bright lighting on biodiversity?	59774 (V Morrow)
The River Granta (specifically the flood plain, riparian habitat) and surrounding mature woodland matrix around Babraham needs better protection.	58157 (H Thomas)
Policies that aim to protect and enhance rivers need to not be undermined by consequential effects of other development in new Local Plan i.e. water supply and quality).	58736 (Cambridge Past, Present & Future)
Encourage approach of Natural Flood management techniques (applied to ditches, drains and streams in catchments of River Cam & tributaries) and suggest this be added as item which can be supported by development proposals.	58736 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
There are multiple potential benefits of Natural flood management	59727 (Environment Agency)
The draft plan should have an assumption in favour of application for large scale schemes (such as treatment wetlands) which improve water quality or tackle flooding	58736 (Cambridge Past, Present & Future)
Would like to see the river corridor recognised as an important heritage asset (as well as environmental asset) in the wording of the draft plan.	58736 (Cambridge Past, Present & Future)
Floodplain restoration opportunity in both Gt River Ouse Corridor and Cam catchment (EA currently undertaking a Gt Ouse Flood Storage & Conveyancing study looking at further opportunities for this).	59058 (RSPB Cambs/Beds/Herts)
The River Cam corridor represents a crucial defining role in the city and surrounding area, part of the setting of the City. It is an important aspect of the historic environment and this inter-relationship needs to be referenced in the policy. Suggest policy should require development to conserve and enhance the River Cam corridor in particular its role in the wider cityscape.	59673 (Historic England)
River Cam Corridor initiative does not mention the historic environment, historic environment designations, or conservation area appraisals.	60198 (J Preston)

Summary of issues raised in comments	Comments highlighting this issue
No consideration of historic / characteristic uses and land management. The whole river corridor from Byron's Pool to	60198 (J Preston)
Baits Bite should be safeguarded as the corridors historic	
uses are vital parts of the historic and cultural as well as	
landscape character of Cambridge.	
Grantchester Meadows, one of the key river corridor historic	60198 (J Preston)
and cultural spaces, is the only vital section of the corridor	
currently without Conservation Area designation. It is	
threatened by visitor pressures and the possible removal of	
the grazing cattle which are vital to traditional water meadow	
management.	
Need to have integrated policy approach encompassing water	59727 (Environment Agency)
resources, water quality, flood risk and recognising the role of	
green infrastructure. Although the value of green	
infrastructure and river corridors is recognised in policy BG/GI	
and BG/RC, it is worthwhile including it as part of the	
integrated water management policy.	50707 (Fusing a part A page)
Tall buildings can have an adverse effect if located too close	59727 (Environment Agency)
to a watercourse by introducing overshadowing impacts and	
artificial lighting which disrupts natural diurnal rhythms of	
wildlife such as bats	50000 (Fair Differ DO)
Concerned too general a concept that requires further	59922 (Fen Ditton PC)
precision.	COZCC (Combridge and Courth Combridge ships Court Destina)
Policy will need precise and clear definition to ensure that it is	60766 (Cambridge and South Cambridgeshire Green Parties)
enforceable	

Summary of issues raised in comments	Comments highlighting this issue
Support the restoration of natural features and use of GI to	60130 (C Blakeley)
support the alleviation of flooding risk.	
Support the delivery of the continuous Cam Valley Trail	60130 (C Blakeley)
Insufficient information on the proposed Cam Valley Trail, this prevents useful comment.	56826 (A Sykes), 58932 (A Sykes)
Promotes river corridors as an amenity for recreation as if	60176 (Cam Valley Forum)
rivers are in good health and can take increased human	
pressure. However, because of low river flows, our water	
quality status is 'poor' in the upper Cam corridor. Summer	
Cam runs pretty much with only treated sewage effluent. On	
the tiny Mel river (tributary of the Rhee) the summer flow	
pulses with the periodic discharge from their local sewage	
treatment works. Water testing shows bulk of E coli in the	
river Cam comes from these treated effluent sources.	
The plan should fully map a 'nature recovery network' which:	60176 (Cam Valley Forum)
 has set targets for improvement 	
 includes aquatic elements 	
(drains, streams, rivers, lakes and ponds) at the	
same time as identifying new large scale areas	
for habitat creation	
 includes woodlands and areas for natural 	
regeneration	
 provides opportunities for linking all above 	

Summary of issues raised in comments	Comments highlighting this issue
Rural access provides health benefits but wildlife (presently	60176 (Cam Valley Forum)
limited by pollution, habitat and biodiversity losses) are also	
vulnerable and need more protection.	
Pressures on open spaces with public access along corridors	60176 (Cam Valley Forum)
are already hard to manage & considerable but sites like	
Trumpington Meadows show positive change a possibility.	
No mention of environmental capacity issues or recognition	60198 (J Preston)
that there may be capacity limits to growth or access by	
either/both local people and visitors (impacts of punt	
operators on Cam, etc).	
As part of Anglian Water's Statement of Common Ground	60446 Anglian Water Services Ltd)
with the two councils, would welcome support in Price Review	
2024 submissions for our case for greater investment in river	
health in AMP8 (2025-2030). Want stronger governance of	
overall river health.	
Propose Anglian Water and the two Councils enter into a	60446 Anglian Water Services Ltd)
Memorandum of Understanding to support the landscape	
scale integrated water management case for new strategic	
water supply provision which could serve existing and new	
communities and business in the Cambridgeshire and wider	
East of England area. The strategic schemes will underpin	
the long-term environmental gains sought on water resource	
planning by policy BG/RC.	
Policy is incompatible with current GCP CSET plans.	58157 (H Thomas)

Summary of issues raised in comments	Comments highlighting this issue
Policy difficult to implement in Babraham if Research Campus	58157 (H Thomas)
removed from Greenbelt. This would cause fragmentation of	
landscape which would leave fragments under pressure from	
over development.	
Planning applications (including current) should be reviewed if	58427 (Linton PC)
they encroach on policy.	
Cambridge East proposals have limited direct benefits as no	58513 (Marshall Group Properties)
river corridor affected but the proposal may have indirect	
benefits; such as recharging the groundwater aquifer (which	
may have wider water catchment benefits, including for chalk	
steams).	
Cambridge WRC relocation project will seek to deliver at least	60473 Anglian Water Services Ltd)
10% biodiversity net gain; this could include green	
infrastructure improvement on the Cam	
(given planned increases in discharges of recycled water) and	
green infrastructure biodiversity net gains in the eastern Fens.	
The relocation project will enable us to consider options for	
improvement on the Cam in accordance with draft policy	
BG/RC.	
Cambridge Waste Water Treatment Plant Relocation Project	56510 (C Martin), 57492 (C Martin), 57577 (Save Honey Hill
(CWWTPR), if sited on Honey Hill, will impact on those using	Group), 57625 (J Pratt), 57677 (J Conroy)
footpaths in this area, due to the scale of the structure	
(development will be visible from River Cam Corridor) and the	
odour coming from the site.	

Summary of issues raised in comments	Comments highlighting this issue
Rebuilding CWWTPR on flat fen landscape is at odds with	57492 (C Martin)
this policy and will be visible from many Public Rights of Way	
(PROWs) in this area.	
Supportive of the approach to protect, enhance and restore	60517 (Taylor Wimpey UK Ltd)
River Cam and its tributaries. River Granta is such a tributary	
and runs along the northern edge of site Land north of	
Cambridge Road, Linton. Development of the site could help	
achieve policy approach.	
Policy S/NEC should reflect that both the current proposed	58134 (M Asplin)
development under the policy and the green belt site	
proposed for the relocation of the current operational Waste	
Water Treatment Work, will be clearly visible from the River	
corridor and surrounding landscape.	
If policy S/NEC is fulfilled, then new housing development will	57577 (Save Honey Hill Group), 57625 (J Pratt), 57677 (J
be highly visible and impact the River Cam corridor	Conroy)
landscape.	
Welcomes guidance for integrating development into the	57945 (L Buchholz)
landscape but concern raised regarding NE Cambridge which	
is already intruding on the river corridor visual amenity.	
Thought should be given to flood risk and prevention in	57812 (Histon &Impington PC)
relation to development.	

Summary of issues raised in comments	Comments highlighting this issue
Suggest a moratorium on large development proposals in the upper Cam valley (Stapleford to the boundary with Essex) until impacts of developments (including cumulative impacts) given permission in recent years or planned for in this and the adopted Local Plan are properly considered following the rollout of such developments. E.g., Huawei, Genome Campus, Sawston housing, Unity Campus, Whittlesford Parkway Area. This is essential to protecting the River Cam and surrounding landscape.	57931 (Ickleton PC)
Streams at the springs adjacent to the Fulbourn Nature Reserve east of the village which have historically maintained wetland within the Fulbourn Fen Nature Reserve (SSSI) are often dry due to the depleted water table level. This largely due to the scale of water abstraction from the underlying aquifer by the Cambridge Water Company from the Fleam Dyke Pumping Station, which is not considered to be a long-term sustainable solution to protect the biodiversity of the local flora and fauna.	57071 (Fulbourn Swifts Group)

BG/PO: Protecting open spaces

Hyperlink for all comments

Open this hyperlink - <u>Policy BG/PO: Protecting open spaces</u> > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 54

Notes

Abbreviations

• PC= Parish Council DC= District Council TC= Town Council RA= Resident Association

NPPF=National Planning Policy Framework ESFA= Education and Skills Funding Agency

Executive Summary

Broad support for the policy intention was expressed within the representations from a range of individuals, organisations, and public bodies. Comments were received that policy needs to be considered against competing policy requirements, that it needs to address the future stewardship of open space and recognise its value in reducing recreational pressures on vulnerable sites and the heritage value of sites. Comments were made that the policy should recognise that open spaces are historic and part of the historic environment (not just viewed in terms of green infrastructure). A number of comments were made by individuals and parish councils regarding the impacts of development on landscape and open space in specific locations.

Table of Representations: BG/PO Protecting open spaces

Summary of icques raised in comments	Comments highlighting this issue
Summary of issues raised in comments	Comments highlighting this issue
Support Policy	
	Individuals
	56691 (J Meed), 56812 (M Colville), 57946 (L Buchholz), 57976 (V Morrow), 60131 (C Blakeley),
	Public Bodies
	56627 (Gamlingay PC), 57934 (Ickleton PC), 58429 (Linton PC), 59210 (Cambourne TC), 59923 (Fen Ditton PC), 60007 (Steeple Morden PC), 60085 (Guilden Morden PC), 60407 (Great and Little Chishill PC)
	Third Sector Organisations
	56678 (The Ickleton Society), 56979 (Trumpington RA), 57080 (Fulbourn Swifts Group),
	Other Organisations
	57010 (The Wildlife Trust), 58631 (University of Cambridge), 59059 (RSPB Cambs/Beds/Herts Area), 59099 (National Trust),
Object to Policy 67 which is unduly restrictive in that it states a specific distance within which replacement facilities should be located.	56847 (Gonville & Caius College)

Summary of issues raised in comments	Comments highlighting this issue
Should identify important ecological areas which can be augmented, connected and protected from development. E.g. City and County Wildlife sites and pockets of special habitat in Conservation Areas. Registration of Open spaces as neighbourhood sites.	57137 (North Newnham RA)
Lack of sheltered areas for sports and lightning which is impacting a huge number of people	57605 (L Cucurachi)
Criteria for designation of Local Green Space are quite restrictive and therefore policy-makers should consider other options for protecting existing open space just outside the development framework valued by the community. Existing Local Green Spaces, Protected Village Amenity Areas and Important Countryside Frontages should be retained. Two sections of The Causeway, Bassingbourn-cum-Kneesworth are an important connection between the street scene and the East Anglian Chalk landscape and should be considered for ICF designation.	57712 (Bassingbourn-cum-Kneesworth PC)
Support the proposals which exclude any development in Little Linton and the land between Little Linton and Linton. The settlements of Linton and Little Linton have historically had distinct identities. New development in the area would disrupt the historic open landscape, destroying the separation and damaging the individual character of each settlement. Land in this area is a valuable environmental resource, which should be protected. The direction of future development to other more sustainable locations is appropriate and will ensure that Little Linton and Linton retain their identity.	57841 (S Nickalls), 57872 (A Nickalls), 57916 (S Foulds), 57925 (H Lawrence-Foulds), 57958 (C Mackay)

Summary of issues raised in comments	Comments highlighting this issue
Policy 67 needs strengthening to reflect environmental location;	57884 (North Newnham RA), 57961 (E Davies), 58176
environmental aspects of open space are inherent to the location of	(H Brown)
the space itself and cannot/ should not be relocated; needs to create	
buffer areas around wildlife sites as per Wildlife Trust and national	
standards	
There are no all-weather skateparks in Cambridge. Existing	57990 (J Humphrey), 58108 (G Gardner), 58111 (K
skateparks lack lights and rain coverings. Currently skating is summer-	Enright)
only sport. More skateparks are needed in the north of Cambridge.	
Impact of LED lighting on natural open spaces, sports fields and clubs,	58299 (North Newnham RA)
green belt, urban fringes and residential areas needs to be reviewed.	
A more balanced provision is needed with better technical cowls and	
restricted times.	
Support policy. Do not support loss of open space where applied to	58751 (Cambridge Past, Present & Future)
private benefit. The policy needs to address the future stewardship of	
open space and recognise its value in reducing recreational pressures	
on vulnerable sites and the heritage value of sites.	
Consideration needed for competing policy requirements	59012 (Metro Property Unit Trust)
Clarify allotment protection including sites with statutory protection	59245 (D Fox)
requiring government approval for disposal. All allotments should be	
declared statutory.	

Summary of issues raised in comments	Comments highlighting this issue
The department welcomes Policy 67's approach towards education sites. It recommends that on education sites, the loss of open space is considered on the basis of whether it is still needed (as demonstrated by the applicant) and what mitigations are proposed, such as enhanced quality of remaining open space or more inclusive accessibility.	57484 (ESFA Department for Education)
Policy should allow for an appropriate assessment on the basis of need for the site/its use against which a planning application can be assessed. The policy should reflect the wording of NPPF paragraph 99 and allow for qualitative criteria, in order to allow an appropriate assessment to the merits of each individual case.	59537 (Gonville & Caius College)
No mention that open spaces are historic and part of the historic environment. Should consider their significance as a whole, not just in terms of green infrastructure	60199 (J Preston)
Give great prominence to green networks and allow for the benefits of only visual accessibility.	60333 (North Newnham RA)
Lack of direction and information associated with this Policy - impossible to comment on.	60769 (Cambridge and South Cambridgeshire Green Parties)
Development at Cambridge East will not have an impact on existing accessible open spaces but plenty of opportunity to create new spaces.	58518 (Marshall Group Properties)
Contrary to this policy is destruction of Green Belt at Honey Hill. Proximity to villages of Fen Ditton, Quy, Horningsea and Teversham where there has been lack of consultation.	57496 (C Martin), 57505 (A Martin)

Summary of issues raised in comments	Comments highlighting this issue
The relocation of the Cambridge Waste Water Treatment Plant to an	58070 (Horningsea PC)
area of Green Belt does nothing to protect open spaces.	
Agree with this policy in principle. However, the achievement of Policy	57517 (Save Honey Hill Group), 57620 (J Pratt), 57678
S/NEC: North East Cambridge, appears to contradict this policy as the	(J Conroy), 58135 (M Asplin), 59217 (C Martin)
development on Cambridge North East Area is predicated on the	
relocation of the Cambridge Waste Water Treatment Plant to an area	
of Green Belt.	
No Comment	57400 (Huntingdonshire District Council)

BG/EO: Providing and enhancing open spaces

Hyperlink for all comments

Open this hyperlink - <u>Policy BG/EO: Providing and enhancing open spaces</u>> then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this section: 52

Abbreviations

• PC= Parish Council DC= District Council TC= Town Council BDG= Biodiversity Net Gain

Executive Summary

General support for the policy direction from a range of individuals, organisations, developers, and public bodies, with new provision of open spaces widely supported.

Comments regarding the application of this policy for new development included those suggesting that: the policy should be applied on a site-by-site basis; smaller developments should ensure provision of open space; onsite provision not off-site financial contributions should be required; new dwellings should have provision for food growing space (this point was also supported in response to the quick questions); open space should be provided within reasonable walking distance of residents' homes; standards should continue to differentiate between Cambridge City and South Cambridgeshire to reflect the differences between the two areas; SUDs should not be treated as open space; and open space should include provision for biodiversity. A few developer comments wanted more clarity regarding the specific policy requirements.

Broader comments about open spaces included: Cambridge and South Cambridgeshire Green Parties suggested that the policy direction under BG/GI should also be applied to BG/EO, and that multifunctionality should not reduce amount of overall public

space; Historic England comments highlighted how open spaces can form an important part of the setting of heritage assets; support for provision of allotments, concern relating to multi-storey buildings which risk dominating open space and affecting the character of Cambridge; requests for provision of new skateparks and growing spaces; and requests that open space was provided to meet the needs of equestrians. A few developers identified that their site would provide open space to meet needs.

Table of Representations: BG/EO: Providing and enhancing open spaces

Summary of issues raised in comments Comm	nents highlighting this issue
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Cupport Policy	
Support Policy	Individuala
	Individuals
	56692 (J Meed), 57626 (J Pratt), 58136 (M Asplin),
	60132 (C Blakeley),
	Public Bodies
	58432 (Linton PC), 60008 (Steeple Morden PC),
	60086 (Guilden Morden PC), 60408 (Great and
	Little Chishill PC),
	Third Sector Organisations
	56980 (Trumpington RA), 58776 (Cambridge Past,
	Present & Future), 60770 (Cambridge and South
	Cambridgeshire Green Parties)
	Other Organisations
	57011 (The Wildlife Trust), 58636 (University of
	Cambridge),
	Developers, Housebuilders and Landowners
	(58777) Trumpington Meadows Land Company,
	58832 (CBC Limited, Cambridgeshire County
	Council and a private family trust), 59300 (National
	Trust), 60520 (Taylor Wimpey UK Ltd),

Summary of issues raised in comments	Comments highlighting this issue
We fully support policies that aim to increase greenspace provision and access, whilst also helping to meet biodiversity objectives.	59072* (RSPB Cambs/Beds/Herts Area)
All new homes should have provision for food growing and everyone should have access to growing spaces. All new community buildings should offer space for cooking, eating, sharing and learning about food.	59079* (Cambridge Sustainable Food CIC)
Access to open spaces must be available to all users including equestrians. This policy excludes equestrians. Policy should include equestrians if it includes cyclists unless there is good reason for their exclusion e.g. central urban areas.	56699 (British Horse Society)
Policy needs to be balanced with less development, if possible.	56732 (Croydon PC)
 Allocation of new sites is needed. Public access needs to be included in planning decision making from the outset. 	56628 (Gamlingay PC)
No new housing should be shoe-horned into existing villages. New developments of greenfield sites NEVER result in a net increase in open spaces.	56813 (M Colville)
On many new housing developments, the landscaping close to homes tends to consist mainly of miniature ornamentals, which are often of little value for nature and are cut back so hard in maintenance regimes that they provide little green vegetation to enhance the appearance of the limited open space.	57086 (Fulbourn Swifts Group)
Open Space Standards will be required to be reviewed through the Local Plan to reflect the differences between the City with its urban character and the more rural environment of the villages.	57175 (Southern & Regional Developments Ltd), 57248 (European Property Ventures - Cambridgeshire),

Summary of issues raised in comments	Comments highlighting this issue
There must be no reduction in the previous plan's requirement for both	57813 & 57876 (Histon & Impington PC)
informal and formal open space per 1000 new residents.	
New open spaces including allotments MUST be created especially where	
developments have no gardens. These should be within a reasonable	
walking distance (15 minutes) but 5 minutes for open spaces generally.	
There should be lower limits so that smaller developments also meet	58004 (Cambridge Doughnut Economics Action
the limit allocations, to ensure piecemeal developments avoid not	Group)
providing open spaces.	
 Developers should not be permitted to double-count open spaces 	
that are intended to meet two functional and incompatible criteria.	
Eg. the play area and a [SUDS] rainwater catchment area, the play	
area is often submerged for large portions of the year.	
The Open Space standards should continue to differ between Cambridge	60520 (Taylor Wimpey UK Ltd), 60574
and South Cambridgeshire to reflect the differences between these areas.	(Countryside Properties - Fen Ditton site)
Policy direction should be applied on a site-by-site basis. Development	59013 (Metro Property Unit Trust)
proposals for enhanced, or rationalised facilities may already have open	
space or recreational facilities and capacity elsewhere.	
The policy should acknowledge the requirements for providing BNG when	57387 (Persimmon Homes East Midlands)
calculating the typologies of open space provision.	
Development should provide onsite provision and not off-site	57817 (D Lister)
financial contributions.	
 Other spaces should include green jogging and cycle routes for their 	
high value for both recreation and transport.	

Summary of issues raised in comments	Comments highlighting this issue
Off-site open space S106 contributions has resulted in residents of new developments being denied access to green areas adjacent to their homes. Residents of Mill Park flats in Cambridge were told Section 106 money had been spent improving facilities at Coleridge recreation ground at half mile walk away.	59257 (F Gawthrop)
Support however further clarity is required about how this is calculated and what will be expected on-site.	59767 (Endurance Estates)
Greater clarification is needs about the Open Space requirements for site allocation inform site capacities and viability.	60574 (Countryside Properties - Fen Ditton site)
Policy should explicitly refer to enhancing biodiversity as a component of open space provision for their health, ecological and recreational benefits.	57822 (J Pavey)
 Open spaces risk being dominated by multi-story buildings. An essential part of the character of Cambridge stems from its lack of high-rise buildings and careful earlier planning controls, for example along the tow-path in Chesterton where, for a long period, single storey houses only were permitted. 	57979 (V Morrow)
 Skateparks would be a great way to provide play space for children and teenagers, as well as many adults. More skate-able facilities (particularly covered) would have tremendous positive spill over on the youth of the city who feel particularly isolated and bored during winter months. 	57996 (J Humphrey), 58113 (G Gardner)
Policy should encourage connections between opportunities for multi- functional use and potential links with Green Infrastructure targets and biodiversity enhancement.	59063 & 59067 (RSPB Cambs/Beds/Herts Area)

Summary of issues raised in comments	Comments highlighting this issue
It is important to have high standards for the provision of open spaces especially for sport.	59211, 59214 & 59220 (Cambourne TC)
Demand continues to outstrip supply for allotments, a new higher target level of provision should be included in the plan, to account for current, new and future growth in demand, within and outside the city.	59288 (D Fox)
Open spaces can form an important part of the setting of heritage assets. Both providing and enhancing such spaces is very much linked to the conservation and enhancement of the historic environment. This should be referenced in the policy and supporting text.	59674 (Historic England)
 Need to consider other spaces, e.g. market square & Quayside. Need to: manage existing pressures, avoid harmful intensification of use, and ensure that new development does not increase these pressures, e.g. the river corridor 	60200 (J Preston)
Policy wording should be amended to the effect that new open spaces will be required where justified.	60520 (Taylor Wimpey UK Ltd)
 Open spaces should be managed to maximise biodiversity. The policy direction under BG/GI should also apply here. Multi-functionality should not be used as an opportunity to reduce the overall amount of open space made available. Should SUDS be treated as open space? Current open space standards should be treated as a minimum requirement. 	60770 (Cambridge and South Cambridgeshire Green Parties)
A simpler route to obtaining planning permission for community orchards and allotments is required.	59225* (Teversham PC)

Summary of issues raised in comments	Comments highlighting this issue
Welcome recognition that wellbeing and open spaces are linked, particularly a focus on formal sports pitches. No mention of partnerships with major charities. No mention of support for grass roots clubs and this omission should be rectified.	59225* (Teversham PC)
Should be greater planned allotment provision. Growing unmet demand, outstrips supply. Provide flexible open space capable of conversion in future.	59227* (D Fox)
 Open spaces already exist on the Honey Hill land that is Green Belt No operational need to move the Cambridge Waste Water Treatment Plant (CWWTP) to Honey Hill. The public has the right to robustly question whether this relocation is a nationally significant infrastructure project when in fact there is already a fully functioning sewage works in place. 	58071 (Horningsea PC)
No comment	57402 (Huntingdonshire District Council)

Site related open space comments

Summary of issues raised in comments	Comments highlighting this issue
Policy S/NEC: North East Cambridge, appears to contradict this policy. Unclear where this is recognised within the Plan to allow informed land use decisions to be made.	58136 (M Asplin)
Fulfilment of S/NEC Policy through relocation of CWWTP to the Green Belt would be completely contrary to this Policy.	57626 (J Pratt), 57679 (J Conroy)
Land off The Lawns, Cambridge HELAA site 40425	56847 & 59537 (Gonville & Caius College)
Note the potential for Trumpington Meadows Country Park and Hobson's Park being designated as Local Green Spaces.	56979 (Trumpington RA)
Proposed Important Countryside Frontage on The Causeway.pdf	57712 (Bassingbourn-cum- Kneesworth PC)
Access to the Local Green Space Gamlingay First School Playing Fields (Green End, Gamlingay SG19 3LF) is currently restrictive and difficult for residents (owner Cambridgeshire County Council) Access rights to any public green space needs to be specified in the planning permission.	56629 (Gamlingay PC)
 Small green spaces provided throughout development increase the amounts of physical activity that residents carry out and, and that these spaces are supportive of good mental health and wellbeing. MGH propose new green infrastructure as part of the proposals at North Cambourne, where significant areas of the site will be used for green space in conjunction with sport, recreation, natural habitats and biodiversity offsetting. 	57906 (Martin Grant Homes)

Summary of issues raised in comments	Comments highlighting this issue
 Cambridge East proposals align with the Local Plan requirements, with significant formal, such as sports pitches and urban squares, and informal, such as new accessible 'countryside' in the green corridor, proposed. The greenspace is to be dispersed, occurring throughout the development and within the developed areas themselves. 	58520 (Marshall Group Properties)
 The ambition is to ensure that where appropriate green spaces are multi-functional. Trumpington South can provide double the open space requirements, this will: enhance access to existing open space provision in the Trumpington Meadows Country Park. augment the strong landscape setting to the City established as part of the Trumpington Meadows project. provide major additional recreational opportunities for people of all ages and abilities and help to integrate new and existing communities at Trumpington. 	(58777) Trumpington Meadows Land Company
The provision of high-quality open space that enhances the Campus' integration with Cambridge is one of the main aims of the Spatial Vision. The Campus expansion into the identified Area of Major Change represents an excellent opportunity to provide and enhance access to open space for all Campus users and visitors, especially if integrated into other existing initiatives and provision.	58832 (CBC Limited, Cambridgeshire County Council and a private family trust)