REPORT TO:	Conservation Advisory Group Conservation, Sustainability &	26 th April 2006
AUTHOR/S:	Community Planning Portfolio Holder Conservation and Design Manager	

DRAFT SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL BIODIVERSITY STRATEGY

Purpose

2.

1. To advise members of the Conservation Advisory Group on the outcome of the public consultation exercise for the draft South Cambridgeshire District Council Biodiversity Strategy and seek support to recommend the adoption of the document as Council Policy, incorporating the proposed changes as outlined in the attached appendix 2.

Effect on Corporate Objectives

Quality, Accessible	The Biodiversity Strategy will be fundamental to the delivery of
Services	high quality planning services.
Village Life	The Strategy will have a significant impact upon the
•	enhancement of village life by ensuring that new development
	seeks to conserve and further enhance biodiversity.
Sustainability	The Strategy will be fundamental to the achievement of sustainable development by seeking the conservation of priority species and habitats.
Partnership	The Strategy outlines the current extent of external and internal partnerships. Hopefully the Strategy will act as a catalyst for the forging of further partnerships.

Background

- 3. On the 26th January 2005 the Conservation Advisory Group considered a report on the developing *Biodiversity Strategy* that was to be statement of the Council's policy in respect of the preservation and enhancement of the district's biodiversity.
- 4. A further version of the Strategy was presented to the Group on the 27th April 2005 where the content and vision of the document was considered.
- 5. A final pre-consultation draft of the Strategy was presented to the Group on the 14th December 2005 for consideration and comment prior to its final draft production and undertaking of the consultation exercise.
- 6. Following printing of the draft Strategy, it was issued for public consultation via Members, all parish councils and selected conservation bodies and development organisations on the 10th March 2006. It was also published on the Council's website. The consultation period closed on 14th April. A number of comments were received after the end of the consultation period, but these have all been included in the appendix to this report.

Considerations

- 7. Copies of the Strategy were also provided to relevant offices within Development Services, every Development Control Team, the Senior Ranger at Milton Country Park, the Land Drainage Manager, Huntingdon and East Cambs district councils, Cambridgeshire County Council, Cambridge City Council, Government Offices for the East of England, CALC, CPRE, Cambridge Preservation Society, RSPB, English Nature, the House Builders Federation and many other local interest groups and multi-disciplinary practices. A full list can been found in appendix 1.
- 8. 24 responses were received and these are summarised in the appendix 2.

Options

- 9. The Conservation Advisory Group are requested to either:
 - a) Recommend that the Conservation, Sustainability and Community Planning Portfolio holder presents a report on this matter to Cabinet seeking adoption of the draft South Cambridgeshire District Council Biodiversity Strategy as Council Policy (subject to the incorporation of the changes outlined in appendix 2);

or

b) To require officers to bring a revised draft of the South Cambridgeshire District Council Biodiversity Strategy to a future meeting of the Conservation Advisory Group incorporating additional amendments and revisions as agreed during the consideration of this matter by the Conservation Advisory Group at their meeting on 26th April 2006.

Financial Implications

10. The production of the South Cambridgeshire District Council Biodiversity Strategy will be funded from existing departmental resources.

Legal Implications

11. The draft South Cambridgeshire District Council Biodiversity Strategy is to be adopted as Council Policy in the short term. Following adoption of the new LDF (due March 2007) the Strategy will be reviewed and cross-referenced to the relevant policies contained within the LDF. A sustainability appraisal will be prepared and the revised Strategy (together with the sustainability appraisal) will then be issued for further public consultation prior to adoption as a Supplementary Planning Document (SPD).

Staffing Implications

12. None specific.

Risk Management Implications

13. The Council has identified the need to strengthen biodiversity conservation and to produce detailed biodiversity guidance for the development control process in accordance with PPS9: *Biodiversity and Geological Conservation*. Failure to complete

the publication and adoption of the Strategy may result in a lack of clear guidance and missed opportunities for biodiversity conservation.

Consultations

14. The draft South Cambridgeshire Biodiversity Strategy was issued for public consultation as outlined in item 7 above.

Conclusions/Summary

- 15. Members will be aware of the increasing need for biodiversity conservation and to deliver an enhanced quality of village life. The establishment and adoption of appropriate planning guidance on biodiversity is fundamental to the achievement of a high quality development.
- 16. It is perhaps relevant to note that PPS9: *Biodiversity and Geological Conservation* provides a significant steer for the planning guidance section of the Strategy and has been particularly well received by English Nature and the RSPB.
- 17. The Strategy will be an integral part of the emerging policy framework for the Council and will consequently have a major role to play in conserving biodiversity across the district. The full responses received in respect of the consultation exercise are set out in the attached appendix 2.

Recommendations

The Conservation Advisory Group are requested to recommend that the Conservation, Sustainability and Community Planning Portfolio Holder presents the draft South Cambridgeshire District Council Biodiversity Strategy to Cabinet to seek its approval and adoption as Council Policy, subject to the incorporation of the changes outlined in the attached appendix 2.

Background Papers: the following background papers were used in the preparation of this report: Planning Policy Statement 9: *Biodiversity and Geological Conservation*. ODPM, 2005

Contact Officer: Rob Mungovan – Ecology Officer Telephone: (01954) 713402

Appendix 1 – Consultees in addition to those mentioned in paragraph 7

Longstanton Action GroupRamblers' Association Cambridge GroupMiss Sue JeggoThe DirectorBritish Horse Society (Cambridgeshire)Friends of the EarthThe DirectorMrs Jean PerratonForestry CommissionCam Valley ForumThe DirectorMr Gavin StollarCambridgeshire Association of LocalNetwork Rail - East AngliaCouncilsThe DirectorThe DirectorThe DirectorCircle 33 Housing TrustCambridge Housing Society LimitedThe DirectorThe DirectorGranta Housing Society LimitedHousing 21The Woodland TrustMr B JacksonGranthamThe Wilbraham River Protection SocietyMr Julia NapierSecretary for the Friends of the Fleamand Dyke and Roman RoadMrs Liz KendrickMr John WilliamsonMr Mike OxfordDevelopment and InfrastructureProject OfficerGO-EastAssociation of Local GovernmentEcologistsEcologistsThe Wildlife TrustRoyal Society for Protection of BirdsThe Manor HouseEastern England Regional OfficeGreat CamboruneCambridgeHr Philip ClarkSavillsCambridgeshire County CouncilCambridgeHighways AgencyHouse Builders FederationOperations DivisionBrightlingseaBedfordEssexBidwells Property ConsultantsMr Roger HandfordCambridgeEnvironment AgencyBidwells Property ConsultantsMr Roger HandfordCambridgeEnvironment Agency <th>Mr Mark O'Coppor</th> <th>Dr Deger Moreton</th>	Mr Mark O'Coppor	Dr Deger Moreton
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	Mr Don Proctor	Carter Jonas
RPS 6 - 8 Hills Road	RPS	6 - 8 Hills Road
Cambridge		Cambridge

Consultee	Nature	Representation	Assessment	Recommendation
Cllr Kindersley (Leader of the	Support	1) Thanks for the official invitation to comment on the Biodiversity Strategy.	1) Noted	1) No change
Council)			2) Minor points discussed,	2) Change supporting
		2) Two teeny questions: Page 66 has a pick of a bat box that	clearer pictures to be	text of CEA 13, target
		looks extremely like a standard bird box. Is it? Proposals Map	found. The Gamlingay	habitat to, "Acid to
		3 (p 62) lists the Gamlingay to Wimpole CEA as chalk	to Wimpole CEA to be	chalk grassland with
		grassland in the key - is it?	more accurately	associated
F laura atla	0		described.	woodlands".
Elsworth Parish Council	Support and	1) You are to be congratulated on bringing together a host of information into what is an informative statement of the	1) Noted	1) No change
(by Paul	critiscm	present and how the strategy may be taken forward.	2) Noted. The SCBAP	2) No change.
Harding)		Inevitably, it is rather technical and the overall content is	BAPgr/1 seeks to	However, ensure that
		guided by SCDC?s statutory obligations. These are not	specifically influence the	the Tree and
		criticisms, merely statements of fact.	management of road	Landscape Officer
		2) If I have one criticism, the Strategy does not deal in any	verges. It states that road verges represent a	shows due regard to the value of existing
		detail with the importance of roadside verges, both as relics	significant grassland	grasslands when
		of former agricultural grasslands and (in the case of new	resources. Tree planting	taking forward the
		verges) as opportunities for biodiversity enhancement. Also	schemes along roads	Tree and Hedge pack
		roadside tree planting is an issue that perhaps should be	should be considered for	scheme and the
		considered more carefully in relation to the possible effects	their impact upon	Parish Planting
		on biodiversity.	existing grasslands of	initiative
			value.	
		3) It was good to see Elsworth featured several times, with		3) No change
		the importance of both the Fardells Lane Village Green	3) Noted	
		Space and Elsworth Wood being recognised.		4) The Biodiversity
		4) The interduction of the Occuth Occurshide schine Disdiversity	4) Noted and agreed.	Site Checklist should
		4) The introduction of the South Cambridgeshire Biodiversity		be amended to
		Site Checklist, to accompany applications for new developments (infill, greenfield or brownfield) is an important		incorporate the
		step in attempting to control the progressive loss of local		following question before the section
		biodiversity. I foresee that its use will place an added burden		provided for any

Appendix 2: Summary of Consultations Received on the Draft South Cambridgeshire District Council Biodiversity Strategy

		on planning officials in ensuring that the information provided by developers is of sufficient quality and depth. I note that the Checklist, as included in the Strategy, does not ask for information about how the developer acquired the information provided. This would appear to offer opportunities for undocumented assertions to be made by developers, which would clearly go against the requirements outlined in the bullet points on page 81 of the Strategy.		additional information, "Please list the source(s) of information used to complete this checklist"
British Horse Society Cambridgeshir e, Sue Jeggo	Commen t	1) Nothing in the strategy should impinge on public safety and/or rights of way. Rights of Way are protected by a number of Acts - The Wildlife & Countryside Act 1981, Highways Act 1980, Rights of Way Act 1990 and Countryside	1) Noted 2) Noted	1) No change 2) No change
Access & Bridleway		Act 2000.	3) Noted	3) No change
Officer,		 2) Page 14 - Roadside Verges have become increasingly used by growing numbers of horse riders as a safe refuge to avoid the dangers presented by growth in traffic. 3) Green strips around farmland can offer excellent opportunities for public access, as well as wildlife corridors. 4) Please take into account the requirements set out in the County Council Rights of Way Improvement Plan, now a Statutory document. 	4) Noted	4) No change anticipated, however given the late date of the response further time is needed to read and consider the implications of the County Council Rights of Way Improvement Plan.
Cambridgeshir e County Council	Support and	1) Broadly - after brief inspection, this document appears to be sufficiently well researched, clear and logically arranged to contribute usefully to the appiarament of its ambition	1) Noted	1) No change
(Dominic Doble, Highways and Access Division)	comment	 contribute usefully to the achievement of its ambition. 2) It should be noted that in South Cambridgeshire there are significant coincidences of wildlife interest and public right of way, where it could be argued the latter has provided the protection that sustained the former. Roman Road and Achieven Streat are examples. 	 2) Noted 3) Noted, the Countryside Enhancement Area maps were provided to 	2)No change3) No change4) No change anticipated
		Ashwell Street are examples. 3) I would suggest that provision of open space and routes	the consultancy team producing the Green Infrastructure Strategy	

		 should be considered with current provision and current and likely future demand in mind. To this end I would recommend referral to the County (?) Greenspace Strategy. I would add that members of the public seeking a countryside experience could go home more satisfied if directed to an area of amenity open space having fed the ducks and seen a grey squirrel, than if they have been encouraged to use a site valuable for a species susceptible to trampling which they were unable to recognise. A lichenologist for example, would of course need to be treated differently to report a satisfactory visit. I am not sure that this level of sophistication is reflected. 4) The Cambridgeshire Rights of Way Improvement Plan is not mentioned despite being occasional reference to countryside access for which it is the chief statutory guiding document in the county. The most pertinent Improvement Plan policies are Statement of Action Issue 6 action (6/3) calling for better conservation liaison and Issue 8 action 8/1 seeking an anti-fly tip programme on paths. The public right of way network is also the sensible basis for any attempt to provide attractive transport alternatives to the car, for instance for journeys to school from existing or new settlements (partly covered by actions under Issue 3). 	and are suitably represented within it. 4) Noted. Further consideration of the ROWIP against the Strategy required given the late date of the response. It is not envisaged that the implications of the plan against the Strategy will be significant.	
Little and Great	Support and	General 1) This draft has been warmly welcomed in the Abingtons.	1) Support for partnership and general	1) No change
Abington Parish Council	comment	The Strategy will both encourage and help to focus local activities to conserve and develop the natural environment	awareness welcomed.	2) The maps contained within
(Patrick		within the framework of the Village Plan which the two	2) Noted, it would appear	pages 41 to 55 should
Daunt,		Abingtons established last year. We particularly welcome the	that the maps may have	have designation type
Coordinator,		stress on partnership and general awareness, and the	been missed out during	written in full, so that
Abington Naturewatch)		enhancement of widespread public enjoyment by these means and by means of improved access.	the printing process. No other responses have	page 41 would read: Local Biodiversity
			highlighted this problem.	Area map 1.
		2) Readers have had some difficulty with the structure of the	With respect to the use	Beechwoods Local
		document; we have not, for example, found the Proposals	of various acronyms to	Nature Reserve, Great

Map 3 mentioned in BS8 on page 60. We ask moreover	describe the range of	Shelford.
whether there could be some simplification of terminology. In	designated sites, other	Page 48 would read:
particular, it is not always easy to grasp or retain the	readers have understood	Local Biodiversity Map
distinctions between LBAs, SBGIs, SACs, SSSIs, LNRs, PPs,	the distinctions between	8. Fardell's Lane
VGs and Wildlife Corridors, or to be sure how they are related	them. For example, table	Village Green Space,
to each other.	8, page 39 lists all of the	Elsworth.
	LBAs. Perhaps the full	Page 53 would read:
Areas of Special interest or concern	use of the wording	Local Biodiversity Map
3) <u>The river Granta</u> . While none of the reaches of our river	(rather than PP or LBA)	13.
appears to be under serious threat of damage or	should be used more,	Babraham Pocket
deterioration, there is plenty to do both in surveying and	especially upon the map	Park.
recording diversity of species and in exploring how to	headings	
increase public access. It is of course possible that in the		3) No change
course of this work we shall encounter more serious issues.	3) Noted	-,
	-,	4) No change
4) The disused railway (between Great Abington village and	4) Noted. The disused	,
the Land Settlement). This is an area of major concern; it has	railway line was visited in	5) No change
seen over the last two decades a severe decline in	the summer of 2005 and	, 3
biodiversity which can only continue if counter measures	was not considered at	6) No change
cannot be devised. In the recent past SCDC's Ecology Officer	that time to be	-
has mentioned its possible designation as a Wildlife Corridor,	particularly noted worthy	
and we hope that the Strategy will provide a policy basis for	in terms of its flora or	
pursuing this or some effective alternative as a matter of	general continuity of	
urgency.	habitats. A repeat visit	
	could be arranged in the	
5) Diverse area to the south-west of Bourn Bridge Road, Little	future with the	
Abington. An area bounded by Bourn Bridge Road, the old	respondent.	
A11, the river Granta and the so-called Coach Road covers		
within a relatively small space and potentially rich variety of	5) Noted	
habitats (two diverse road verges including a PRV; an		
unpaved lane; arable; woodland; riverside; grassland grazed	6) Noted. Partnership	
until recently). Results of our river survey, an improved	opportunities for	
mowing regime for the PRV and new farming practice could	conservation may exist	
all promote biodiversity, while the pasture is at great risk	and should be explored.	
owing to breach of planning regulations.		

		<u>Conclusion</u> 6) The above three items are exemplary rather than exclusive; the greatly increased awareness and exploration of our locality may well throw up other priorities. The Abingtons have established a means for engaging interested villagers in actively monitoring and promoting biodiversity, and for stimulating awareness among the public at large. Before long this endeavour may be checked unless there is practical support; meanwhile access to professional advice over a number of issues will be crucial, and we are confident that we can offer a framework for fruitful partnership.		
Hazel Smith (Milton)	Support and criticism	 1) I really enjoyed reading the strategy - for a technical document it is interestingly put together and beautifully illustrated. 2) In case you have not spotted them, here is a list of typo's (I don't feel qualified to judge anything else!) p19 bottom cell, first column - PrioRity p25 row3, col2 - siteS p31 under Prot of Priority Species and Habitats - SpecIAI Area of Conservation p38 under VGS 2nd line from bottom - SCDC p70 under the top right picture WIIdlife Corridor p72 fullstop before Where in Guideline 4 p79 Table 11 row3 col3 - even if IT only holds water seasonally (Full stops missing in these boxes) p80 Grass snake col2 - particularly THOSE? near to muck heaps Badger col2 full stops p81 2nd Col bullet point 3 needs closing bracket p82 3rd box Site totals 1 "ha" or more. Badger is not in the check list of Protected species p83 SummariSed as. Box 3 - TemporarRy 3) Congratulations on a very attractive and useful document. 	 Noted Noted and accepted Noted 	 No change Accept all identified typos No change

Alan Alderson Fen Ditton)	Support	1) I must congratulate you on this. Given the amount of development that is being sought throughout South Cambs and the threat that poses to nature, you have very cleverly found a way to utilise almost any aspect of development to provide vital elements necessary for the biodiversity of wildlife. It has made excellent reading and I sincerely hope	 Noted Noted, respondent has understood it properly, the VGS falls within the LBA 	1) No change 2) No change
		that it will be adopted.2) One plus for Fen Ditton, if I read it correctly, our recreation ground will be classified as an LBA. Is that right?	designation.	
Meldreth Parish Council	Support	1) Firstly congratulations on a very comprehensive document which was circulated to our councillors recently.	1) Noted	1) No change
(Graham Borgonon)		2) It was good to see that the Melwood LNR was already mentioned in the document demonstrating everything is bang up to date.	 2a) Question addressed through discussion with the respondent. 2b) The PC will not be 	2a & 2b) No change
		I have a couple of q's 2a). The LBA map 5, which shows Melwood, also shows prominently the number of drains which used to flow in the direction of the River Mel	2b) The PC will not be expected to complete the checklist it will be the responsibility of the applicant. Text at the top of p82	
		2b). Re the Biodiversity Check List: this seems a good idea Whilst biodiversity may not be too much in the forefront of many parish councillors' minds, the checklist would be a useful reminder and locals may be able to add local knowledge. If/when the strategy is approved is the intention that this checklist be circulated to PCs with other planning application documents when appropriate?	explains this.	
RSPB (Kevin Middleton,	Support	 planning application documents when appropriate? 1) Background South Cambridgeshire is located within the London-Stansted- 	1) Noted	1) to 10) No change
Asst Conservation		Cambridge Growth Area. Therefore, the threats to biodiversity through development are likely to be great and only likely to	2) Noted	
Officer)		increase. It is important that the Local Development	3) Noted. Whilst it is	

	Framework (LDF) recognises this and sets out ways to	acknowledged that the
s	conserve and enhance biodiversity. The RSPB is pleased to see that the Council is intending to adopt this Biodiversity	Hanson-RSPB project is undoubtedly a significant
	Strategy as a Supplementary Planning Document (SPD), in support of the LDF.	habitat creation project it lies over the district
		boundary in HDC it is
	 The conservation and enhancement of biodiversity are priorities of the RSPB and as such, we are pleased to see 	therefore not considered a scheme that SCDC
	that the strategy sets out considerable scope for this to occur	can any longer influence
	on both small and large scales and also within developments, a key principle in this region if development is to continue at	to any great degree. However, it is considered
	ts current rate.	appropriate to make
	2) Riadivaraity Action Plan 2005 2008	reference to the scheme
E	 Biodiversity Action Plan 2005 - 2008 BAP rw/10 – we are pleased to see mention of the RSPB's 	with section 4.3 p.73 on good biodiversity design.
	Fen Drayton Lakes proposal under the issue of creation of extensive new wetland habitats. However we believe that	4) Noted
ti	his is an even more appropriate point to mention the nearby	
+	Hanson-RSPB Wetland Project at Needingworth Quarry.	5) Noted
	4) Local Development Control Principles	6) Noted
	The RSPB is supportive of the Biodiversity Statements and the thirteen principle issues. These should, the RSPB	7) Noted
b	pelieves, aid conservation and enhancement of biodiversity	
N 1	within South Cambridgeshire.	8) Noted
	5) The primary objective must be to protect the network of	9) Noted
	statutorily designated sites (i.e. Sites of special Scientific Interest (SSSIs) and Special Areas of Conservation (SACs)).	10 Noted
F	However, it is important that non-designated sites and the	
	wider countryside are also protected from inappropriate development, as these too have vital biodiversity resources.	
V	We are pleased to see this recognised. Wildlife corridors and	
	Local Biodiversity Areas (LBAs) are ways in which the wider environment can be conserved. BS3, BS4 and BS8 set out	

 how these are to be protected. It is also important that these areas are enhanced, either through habitat creation or biodiversity provision in developments, such as green spaces. 6) Where development that is harmful to either a statutorily designated site is permitted, compensation and/or mitigation measures will have to be put in place, in line with nature conservation law. BS5 sets this out and also puts in place measures for compensation and/or mitigation for non-designated sites, i.e. LBAs. The RSPB regards this as a matter of best practice and supports this principle. 	
7) The enhancement of biodiversity is a key issue for the RSPB. Large scale habitat creation and restoration is a way of providing major biodiversity gains. We are therefore pleased to see that the Council has included BS7 – Countryside Enhancement Areas. Sites identified for large scale habitat creation have the potential to benefit both people and biodiversity and also help to meet Biodiversity Action Plan (BAP) targets.	
8) However, biodiversity enhancements are not confined to large scale habitat creation. In line with the Government's Planning Policy Statement 9 (PPS9), development proposals should incorporate beneficial biodiversity features. There is potential for developments of all sizes and scales to provide for biodiversity and could help to meet BAP targets. Biodiversity enhancements can often be simplistic and easily incorporated within developments (as BS11 concerning the building of green roofs shows). BS10 provides for this, whilst the RSPB is also supportive of the guidelines outlined on pages 71 and 72 and would hope to see developers following these as measures of best practice.	

		 9) As the strategy recognises, 70% of land in Cambridgeshire is used for agriculture. Therefore, it is important to maximise the potential of this land, something the strategy sets out in BS13. Those BAPs which cover farmland are clearly of importance and the RSPB would hope that these are considered carefully and targets met. We are also pleased to see mention of stone-curlew, as South Cambridgeshire is part of it's historical breeding range. With careful management it is hoped that this species will return to its former range. 10) The RSPB is supportive of the Strategy, and are pleased to see that it conforms with the principles of PPS9. 		
Environment Agency (Julia	Support and	1) The strategy provides a comprehensive insight into existing features within South Cambridgeshire, and highlights	1) Noted	1) No change
Massey FRB Technical	request for	the future provision of habitats.	2) Noted	2) No change
Asst)	inclusion	2) This document will be a useful guide, particularly when	3)Whilst it is	3) No change
	of additiona I	completing planning applications.	acknowledged that GOV project is undoubtedly a significant habitat	recommended.
	partners hip project	3) Would there be scope to incorporate the Great Ouse Vision (GOV) within the document? The GOV aims the deliver a catchment/landscape scale approach to river restoration and connecting the river to its floodplain - to benefit fisheries and biodiversity.	creation vision the vast majority of the area lies outside of the SCDC it is therefore not considered a scheme that SCDC can influence to any great degree at present.	
Roy Gawthorp & Linda Flavell	Support	1) Having read your survey I wholeheartedly agree with it.	1) Noted	1) No change
Rampton		2) As members of the Woodland Trust we are well aware of the lack of trees in this area I think the general public is	2) Noted. Two tree planting partnership	2) No change
		slowly waking up to this problem but lots more needs to be done about this issue.	projects are highlighted within the Strategy.	3) No change
		3) It is particularly worrying about the amount of new homes	3) Noted	4) No change

Friends of the River Shep (Liz Kendrick, Secretary)	Concern and request for recogniti on of partners hip project	 planned and obviously the ODPM office is not very concerned about it from what we can see. 4) Keep up the good work and let's have lots more of it. 1) The committee of ForShep (Friends of the River Shep) have studied the document and are concerned about obvious omissions in two particular areas. 2) LBA's (page 38 onwards). The areas of Shepreth which would fall under LBAs are: The L Moor, the River Shep, Riverside Walk, Docwras Meadow. 3) Partnership working. We have a partnership history with SCDC which is not mentioned despite ForShep's importance as a beacon conservation group (recognised by its selection 	 4) Noted 1) Noted. 2) L-Moor is a SSSI thus is in the broad class of SBGI, the River Shep is classed as a Wildlife Corridor thus is afforded a degree of protection through principle BS8, the Riverside Walk is an area owned by CCC 	 Noted Recommended that the Shepreth Riverside Walk and Docwra's Meadow are included within the Strategy as LBAs. Recommended that ForShep are included
				,
			criteria of LBA under points 1,2&4. Furthermore it may be worthy of LNR status. Docwra's Meadow fulfils the LBA criteria under points 1,2,3,4,6,&7. Furthermore it may be worthy of VGS designation following discussion with the	and are acknowledged in table the Lead Partner Acronyms on p 92.
Grantchester	Support	1) On the whole this PC is very impressed with the	 landowner. 3) Noted. The partnership opportunities with ForShep should be recognised. 1) Noted 	1) No change

Parish Council	and	scholarship and		
Parish Council (Spike Jackson, Chairman)	and amendm ent request	 scholarship and Thoroughness with which this document has been prepared. 2) We were particularly pleased to note the support in the document for the Cam Valley Forum, and the inclusion of Byrons Pool LNR. Our only concern is regarding the status in the document of Grantchester Meadows (the area of grazing with public access which lies between the City boundary to the North, and the Mill Pool to the South). As I'm sure you are aware, this land has a very high public profile as well as a unique landscape character for this area. At present it is proving very difficult to find farmers willing to graze their cattle on this land, mainly due to market pressures on the cattle farming industry (but due also in part to issues around public access). This in turn is having an impact on the other flora and fauna of these meadows. 3) Your draft document makes no explicit mention of this area of the river Cam, but we note that on Proposals Map 3 it is shown both as a wildlife corridor and as part of a "Countryside Enhancement Area". It is not clear from the map whether it should be considered as part of CEA 8, 11, or 15, since these all merge in the area South of Trumpington. Please could you clarify what value is attached, or what gain is to be expected, for an area identified as a CEA? Would it help attract funding for the preservation of Grantchester Meadows as an area of grazed water-meadows if it were 	 2) Noted. Grantchester Meadows fulfils the LBA criteria under points 1,2,4,6,&7. Furthermore it may be worthy of VGS designation following discussion with the landowner. 3) Noted, P.59, BS7 explains the value of CEAs. It is felt that there would be an advantage in specifically defining the Granchester Meadows with its own CEA in order to raise its profile within the context of local development pressures. 	 2) Recommended that Grantchester Meadows is included within the Strategy as an LBA. 3) Recommended that the area of land east of the M11 River Cam bridge (downstream) to the City boundary is classed as the Grantchester Meadows CEA (map to be presented at the meeting).
	0	given its own CEA tag?		
Highways Agency (Andy Jobling)	Support	1) Thank you for allowing the Highways Agency the opportunity to view the above-mentioned document. We welcome the strategy as a positive development to draw attention to the HABAP, which also contributes to the UKBAP	1) Noted	1) No change
Horningsea PC (Michael Hellowell,	Support	1) You'll be pleased to hear that your above draft publication has now been both well-thumbed and well received in Horningsea. We applaud your strategy in biodiversity,	1) Noted	1) No change

Chairman)		(particularly in CEA ref: 4) and hope it will be adopted as a SPD, as we treasure our Wicken Fen vision and fully support The National Trust and all partners in The Bridge of Reeds project. We will be opposing all three CCC proposed WwTW sites (vaguely) in the Honey Hill area and requesting further searches for existing brown field sites closer to Milton.		
Home Builders Federation (Paul Cronk, Regional Planner)	Request for amendm ents	 Searches for existing brown field sites closer to writton. General Points - In relation to the role and status of Supplementary Planning Documents, PPS12 makes the following points The Council will need to ensure that any requirements set out in the SPD clearly relate directly to specific policies in an adopted Development Plan Document. Appropriate cross- referencing will be required. The Council will have to assess the merits of any other planning requirements being sought (e.g. affordable housing, public open space e.t.c.) before coming to a decision as regards to the content of any Section 106 Agreement. It will also need to assess any such requirements in relation to the overall financial viability of any development. 	 Noted. This version of the Strategy is not intended to go forward as SPD at present. Whilst the comments on the SPD process will be useful in the future at present comments on the content of the Strategy would have been more constructive. Noted 	 No change No change No change No change The comments on S106 funding and Circular 5/05 need to be considered in greater detail with the input of Planning Policy and reported verbally at the meeting.
		 4) It should also be remembered that the advice from Government about what is appropriate to ask developers to contribute towards remains the tests set out in Circular 5/05. It cannot be stated that the developer should pay for the total cost for identified biodiversity schemes if these are also for the benefit of the wider public. The developer should only pay for those elements of improvement that meet the tests set out in Circular 5/05 and these cannot be known in advance, SPD or not. 5) Detailed Points - BS6 Planning Obligations Circular 5/05 states that development should only be required 	 4) Noted. The view of the Planning Policy team is required 5) Noted. The view of the Planning Policy team is required 6) Noted. The need for a case-by-case assessment even for small developments is in important with respect to 	 5) The comments on BS6 and Circular 5/05 need to be considered in greater detail with the input of Planning Policy and reported verbally at the meeting. 6) No change 7) No change

	 to make provision for those facilities that are necessary as a direct result of new development and which fairly and reasonably relate in scale and kind to the development proposed. Given the negligible impact from very small developments it has to be questionable whether a requirement for biodiversity provision from all developments does meet this requirement of 5/05. 6) The suggested Planning Obligation requirement for the provision of at least 10 years site management costs should be deleted. Paragraph B19 of Circular 5/05 states that "as a general rule, however, where an asset is intended for wider public use, the costs of subsequent maintenance and other recurrent expenditure associated with the developer's contribution should normally be borne by the body or authority in which the asset is to be vested. Where contributions to the initial support ("pump priming") of new facilities are necessary, these should reflect the time lag between the provision of the new facility and its inclusion in public sector funding streams, or its ability to recover its own costs in the case of privately-run bus services, for example. Pump priming maintenance payments should be time-limited and not be required in perpetuity in planning obligations". 7) Consultation - The HBF looks forward to being consulted on all future relevant LDF documents. It would appreciate being advised in writing either when any such document is being adopted, or when any DPD is being submitted to the Secretary of State. I look forward to the acknowledgment of these comments in due course, and seeing all the comments from respondents, and the Council's responses to them, clearly set out in any final SPD document. 	 biodiversity. The need for 10 years worth of funding is based on the fact that many habitats take time to develop, such as grassland or may not need any significant intervention for a long period of time such as a pond. Therefore, the medium term management costs of these features is considered to be part of the "pump priming" that the Circular makes reference to. Furthermore, the overall cost is likely to be relatively small when considered against the money invested within a development. 7) Noted 	
Shudy Camps Support	1) I would like to congratulate you on an excellent document	1) Noted	1 to 3) No change

DC (Decer	and	which is very picely presented		
PC (Roger Lemon)	and request	which is very nicely presented.	2) Protected roadside	4) Include the details
Lemon	for	2) In relation to our own parish, I would like to make a specific	verges are an issue for	of Butterfly
	additiona	point regarding roadside verges. The current policy seems to	consideration by CCC.	Conservation within
		be to protect only those verges which have sufficient rare	consideration by CCC.	section 6.0
	protectio	species/ biodiversity interest to justify protection	3) Noted. It is not	Section 0.0
	n of	(comments made on protected roadside verges).	considered to be	5) No change
	species		advantageous to use any	S) No change
	and	3) The next point is not directly related to Shudy Camps, but	butterfly species as BAP	
	habitats	personally I have an interest in butterflies and note that none	species in this Strategy.	
	TIADILAIS	are included in the BAP priority species list. Of particular	Where a species is	
		interest is the chalkhill blue, which was recorded on Fleam	already the subject of a	
		Dyke in 2005 for the first time in many years, the small blue,	BAP, such as the	
		which has been recorded in very low numbers at Gog Magog	chalkhill blue, it will be	
		golf course and Barrington cement works, the grizzled skipper	considered as a Priority	
		at Over railway cutting (soon to be at least partly destroyed	Species by default.	
		by the guided bus route) and the green hairstreak, low	opecies by deladit.	
		numbers of which are also recorded on Fleam Dyke.	4) Noted	
		Tumbers of which are also recorded off riearr Dyke.		
		4) I note also that Butterfly Conservation is not listed under	5) Noted. The Fleam	
		6.0 Useful Contacts and Information.	Dyke and Roman Road	
			sites are both SSSIs.	
		5) I note that Fleam Dyke and the Roman Road are not	thus they are considered	
		specifically listed as Local Biodiversity Areas and in view of	with the category of	
		their increasing importance as chalk grassland habitats, I	SBGI.	
		wonder why this is. I see that you are in touch with the		
		Friends of the Roman Road and Fleam Dyke.		
Gt Chishill PC	Support	1) Your Biodiversity Strategy Draft Report is most impressive	1) Noted	1 to 4) No change
(John	and		.,	
Murgatroyd)	request	2) I moved into Great Chishill in 1972. Maltings Lane and May	2) Noted	
	for a	Street was known as bat alley. We had gloworms, slow		
	broader	worms, grasshoppers, huge quantities of moths, butterflies	3) Noted	
	influence	and other insects, grass snakes, barn owls, corn buntings,		
	to	frogs, newts, hedgehogs,None of these things are	4) Noted. BS13 seeks to	
	conserva	really in evidence these days.	maximise the biodiversity	
	1 0011001 10		maximice the biodiversity	

	tion		potential of agricultural	
		3) My housemartin (and swift) nest occupancy has declined When I come back from France or own West Country I am	land.	
		struck by just how sterile our countryside around the Chishills	5) Noted. Biodiversity	
		is.	Statement 6 seeks to	
			promote biodiversity	
		4) putting up all these nesting sites possibly is not the	conservation and the	
		main priority. Just as important must be to discourage the use	local farming community	
		of pesticides, encouraging the growth and spread of a wide	will continue to be	
		variety of indigenous plants, stop the ruthless cutting back of hedges at inappropriate times, especially by the farmers, etc.	included within this (past partnership project of the	
		hedges at mappropriate times, especially by the farmers, etc.	Cam Sustainable	
		5)we must get our priorities right. Educating the people	Farming Project should	
		who can most affect our countryside and biodiversity,	be remembered)	
		especially the farmers. Incidentally, two of the three main farming landowners in my parish are friends of mine, but l		
		can't say I have had much success in converting them I		
		regret to say.		
English Nature	Support	1) This is a very useful, informative, well written and	1) Noted	1) No change
(Tim Barfield,		beautifully presented document which sets a high standard. I		
Conservation Officer)		have only a few specific comments:	2) Noted	2) Accept requested correction
		2) Page 5: English Nature's open standards are called the	3) Noted	
		Accessible Natural Greenspace Standards (ANGST).		3) Recommended
		3) Page 7: Is the vision to 'preserve' rather than to 'conserve'	4) Noted. The duties of Local Authorities under	change, p.7, replace "preservation" within
		biodiversity? The latter wording would imply some degree of	the CROW Act are	"conservation"
		dynamic change.	important. Table 14,	
			p.94, National Guidance	4) Recommend that
		4) Page 38: Under statutory sites, you might consider making	would be an appropriate	appropriate wording of
		reference to the protections of SSSIs under the Countryside	place to clarify the	the CROW Act is
		& Rights of Way Act 2000, and the duties of the Local Authorities under Section 28G and 28I.	implications of the Act for SCDC	included within Table 14.
		5) Page 70: Traditional orchards were once a common site	5) Noted	5) Accept proposed

	(sight?) across		correction.
		6) Noted	
	6) Tables 10 & 11: These are very useful.		6) No change
	7) Daga 94. The Diadiversity Site Checklist leaks to be an	7) Noted	7) No change
	 Page 81: The Biodiversity Site Checklist looks to be an excellent initiative. 	8) Noted	7) No change
		0) Noted	8) Accept proposed
	8) Page 89: English Nature's contact details are –	9) The breadth of the	correction.
	Bedfordshire & Cambridgeshire Team, Ham Lane House,	Strategy is already very	
	Ham Lane	broad and it strives to	9) No change
		incorporate the	
	9) In addition I wonder whether you had considered if this document could also cover geological conservation? Do	"Geological" of PPS9 through the category of	
	come back to me if we can be of any help on this aspect.	Sites and Biodiversity	
		and Geological Interest.	
		However, at present	
		given the small number	
		of geological sites within	
		the district it is not felt	
		necessary to expand the breadth of the Strategy.	
Milton Parish	1) Milton Country Park	1) Noted. Progress has	1) Recommended
Council	We are surprised to find only one explicit reference to the	been made since the text	change to update
	country park in this document (two lines on p87). We were led	was written. A	wording appropriately.
	to understand that SCDC had already agreed to pursue Local	management plan has	
	Nature Reserve Status for the country park so we're	been drafted for the park.	2) No change at
	surprised to see it is still being "considered". Is the country park going to be included in the audit of all	2) Noted. The	present.
	SCDC maintained land proposed in BAP target BAP urb/6?	Cambridgeshire and	3) No change
		Peterborough Biological	
	2) Black Poplars	Records Centre are	4) Recommend
	The strategy states in several places (e.g. p13, p21) that	leading the 2006 survey,	change to broaden the
	there has been no survey of black poplars and BAP target	checks will be made with	identified bodies. In
	BAP tw/8 calls for a database to be produced by August 2007. It is our understanding that a survey was undertaken in	them.	place of PPC add "those managing
			uiuse manaying

 2001 and identified approximately 300 specimens in the district. The results are lodged at Monks Wood. It may be that this survey removes the need for BAP tw/8 or at least considerably reduces the work needed to produce the database. 3) Management of Roadside Verges BAP target BAP gr/1 calls for the development of an Environment Management Programme for roadside verges and implies that treating them as grassland is the way forward. We would question whether this is the best strategy in all cases. We have one roadside verge which we maintain (on the A10 bypass) which are deliberately not cutting at all, so as to encourage species progression. 4) Churchyards and Cemeteries As part of your work towards BAP target BAP urb/2 you propose to produce a model management plan for PCCs. In our village the parish council not the PCC is responsible for management of the cemetery, so you should probably prefer to "PCCs and PCs" or perhaps more generally as there may be other bodies involved too, "those managing churchyards and cemeteries". 5) Allotments We note your comments in the "Relevance to South Cambridgeshire" column against BAP targets BAP urb/4 and BAP urb/5 where you say that "Allotments are being lost through change affecting many villages". This has not been our experience, in fact if anything the demand for allotments is rising and we are bring (sic) plots back into use at the moment. 6) Development of Cambridge Rowing Lake 	 3) Noted. The management of verges to retain them as grassland habitats is important in order to prevent their invasion by scrub. 4) Noted 5) Noted 6) Noted. Badgers are protected species and as such will be subject to an appropriate level of consideration 7) Noted 	churchyards and cemeteries". 5) No change 6) No change 7) Accept all minor typos
We note that the strategy supports the development of		

	significant projects with biodiversity gain such as: the Cambridge Sports Lake; Coton Farming and Wildlife Reserve wetland area; the Wicken Fen expansion; the RSPB's Fen Drayton Pits. We would like it to be ensured that developments such as this have the appropriate protection measures in place during construction to sustain current biodiversity interest of these sites, as is stated in BAP urb/1 for urban developments. For example we are aware of at least two badger setts (one of which is certainly in use) in the vicinity of the proposed rowing lake, and would like to ensure their protection.		
	 7) Minor typos Page 8, para 2.3.1 line 2 "it's" should read "its" Page 11, table 3 "Summary" should read "Summary" Page 25, BAP target BAP urb/3, "site" should read "sites" 		
WSP for Gallaghers Longstanton Ltd (Andrew Ricketts)	1) BS3 – Designation of Local Biodiversity Areas (LBAs). It is not clear what the difference between a Site of Local Importance for Nature Conservation (SLINC) and a LBA. A LBA is considered to be a recent term and therefore should be explained and described in context with other designations (i.e. within the hierarchy of ecological designations). Such explanation would clarify if a LBA is considered as an additional tier of wildlife designation, and prevent confusion from the public (particularly in relation to the significance of the designation).	1) Noted. SLINC are not contained within this Strategy. The respondent may be confused with another area, or may be mean SBGI. However, their meaning is explained on p.38.	 No change No change No change No change No change Proposed change of wording to be: SCDC
	2) BS4 – Protection and management of LBAs It is not clear the difference between a Site of Local Importance for Nature Conservation (SLINC) and a LBA. An LBA is considered to be a recent term and therefore should be explained and described in context with other designations (i.e. within the hierarchy of designations). Such explanation would clarify if a LBA is considered as an additional tier of wildlife designation, and prevent confusion from the public (particularly	 2) Noted, As for 1 above. 3) The need for 10 years worth of funding is based on the fact that many habitats take time to develop, such as grassland or may not need any significant 	will expect: 1) Development to maximise the provision for existing biodiversity upon a site. 2) Development proposals to make provision for habitat enhancement features

		 in relation to the significance of the designation). 3) BS6 – Planning obligations. The Biodiversity Strategy for SCDC stipulates that in securing biodiversity gain, the ongoing management of these new wildlife habitats will be required for at least 10 years. What is the evidence base for suggesting that the ongoing management of these new wildlife habitats will be for 'at least 10 years'? 4) It is suggested that the following text is added at the end of the 'securing biodiversity gain' paragraph on page 58: "The period of time that any management plan is required to cover will be negotiated taking into account the viability of the development and whether there are any other planning objectives which need to be given priority." 5) BS10 – Biodiversity provision in the design of new buildings It is unclear the exact difference between expectation 1) and 2). The opportunities to maximise biodiversity (as expected in 1)) would be to provide habitat enhancement features, which is considered again in 2). 	 intervention for a long period of time such as a pond. Therefore, the medium term management costs of these features is considered to be part of the "pump priming" that Circular 5/05 makes reference to. Furthermore, the overall cost is likely to be relatively small when considered against the money invested within a development. 4) Noted. The present wording is felt to be adequate as it includes the word "usually" which would therefore imply that a degree of negotiation would be necessary. 5) Noted. There would appear to be a degree of repetition when the exact wording is closely considered. 	upon new buildings and associated structures. 3) As previous.
Foxton PC (Rob Brooksbank)	Support	 I feel that in general it is an informative document which will be of assistance to us in considering the impact on biodiversity of any future planning applications. 	 Noted Noted. It is felt necessary to at least 	 No change No change

		 2) I would question how realistic it is to expect a checklist to be accurately filled out and advice sought from a professional ecologist for small scale planning applications and listed building applications although the implication from table 10 is that such an assessment should be included. Clearly for new builds or applications on or adjacent to Local Biodiversity Areas such an impact assessment is reasonable. Perhaps clarification of which applications would require such an assessment could be included in the document. 3) I notice that BAP targets BAP urb/4 and urb/5 pertain to allotments. I understand that my fellow councillor David McKeown has already discussed the recreation ground extension project with you. I would like to clarify that a large part of that project involves the creation of allotments which will include hedgerow and wilderness areas to encourage biodiversity. Whilst I appreciate that the urb/4 target date of February 2006 has passed, we would welcome your advice on how best to create these areas and also on how to seek Wildlife Enhancement Scheme grants to contribute to this work. 	have the expectation on the Council's side that the checklist should be completed, especially where sites may be complex rather than simply large. Furthermore, it clearly places a requirement upon applicants to show regard for biodiversity. 3) Noted	3) No change
The Magog Trust (Michael Bond Lucy Evans, Governors)	Support	 We welcome the consultation document and find little to fault with it. The Policies and Guidance appear to us to be appropriate. The Trust's land falls wholly within Area 7 on Proposals Map3 and we strongly support the safeguarding of this area. The Trust has made representations to Cambridge City Council in respect of Omission sites that border the District boundary as we regard it as essential that there should be no encroachment onto the Gog Magog Hills from new development in and adjacent the City's southern boundary. Moreover we would wish to see a substantial green corridor 	 Noted Noted, SCDC are not able to determine landuse within the City boundary. Noted. It would be too restrictive if all areas of historic or potential chalk grassland were identified within CEAs. 	 1 to 5) No change 6) Recommended that CEA 4 is expanded southwards to incorporate Fulbourn Fen SSSI (map to be presented at the meeting)

within the City boundary opening up into the proposed	Furthermore, the
Countryside Enhancement Area.	Strategy is trying to draw
	attention to projects that
3) We need to emphasise the importance of including all	have a degree of
areas that have the potential to revert to chalk grassland if	achievability about them,
opportunities arise from the changes in climate and it's impact	rather than simply being
on the profitability of these shallow soils. This could be	visionary.
facilitated under the Environmental Stewardship	violonary.
Schemes (detail regarding species edited out) The	4) Noted. There is a
area was famous for extensive sheep walks well into the 19th	concept project to focus
century.	on the Chalklands and
	their restoration. The
4) Perhaps the East Anglian Chalklands should be viewed in	detail of such is not for
a similar way to the Great Fen Project.	inclusion within this
	Strategy. However, the
5) We are puzzled by the omission of Whitehill (TL 51 53)	support for such a
from the proposed Countryside Enhancement Areas leaving a	project would probably
gap between Areas 5 and 7. We also consider that Signal Hill	make an excellent
and Meggs Hill (TL 51 51/2) are worthy of inclusion and	partnership.
believe that there is still an area of chalk grassland to be	
found at this location.	5) Noted. There is no
	specific reason for
6) Similarly we do not understand the omission of Fulbourn	omitting the sites
Fen SSSI from the Countryside Enhancement Areas given	referred to. The
the importance placed on such habitats in the consultation	boundaries are partly
document. It would be desirable to prevent it becoming	arbitrary and in this case
surrounded by urban development given the pressures for	were taken from concept
new housing in the Cambridge area.	projects being
	developed for the Gogs
7) We note that Fleam Dyke and the Roman Road are seen	area. In order to keep
as forming the principal boundaries to Area 5. Yet both are	the Linear Sites project
designated as wildlife corridors. Some extension of the area	areas separate from the
to bring in the northern and southern margins of these routes	Gogs areas It is not felt
appears desirable.	desirable to join CEA
	5&7.

	Queset	8) The Magog Trust would wish to be represented at any future discussions of the proposals and is willing to share information on its activities and the species diversity on our land with the District Council.	6) Noted. It would appear appropriate to include Fulbourn Fen SSSI within an CEA.	
Old Chesterton Residents Association (Michael Bond Secretary)	Support and amendm ents	 Old Chesterton Residents Association (OCRA) has been made aware of the Draft South Cambridgeshire Biodiversity Strategy and wishes to comment on the Countryside Enhancement Area 3: Milton to Waterbeach wetland habitats, inc. fen and wet grassland. We would ask that the strategy include the area of Milton up to the Cambridge City Council boundary within Area 3, i.e. Chesterton Fen. This area is part of the river habitat and active flood plain yet has apparently been abandoned to its fate in terms of its biodiversity. OCRA's interest stems from the fact that this area was, until recent incursions by illegal industrial activities, regularly used by residents for recreational purposes as the Fen Road provides a route parallel to the river and accords the opportunity for circular walks of varying length through potentially pleasant countryside. We consider that the area is inappropriate for the level of development already existing and action is needed to stem the growth of activities that are imposing undue burdens on an inadequate access. We note from pages 31 and 32 that the District Council will consider using Article 4 Directions of the Town and Country Planning (General Permitted Development) Order 1995 to control development that is of potential harm and maximise opportunities for biodiversity within new developments. We consider that the area of Chesterton Fen constitutes a particularly sensitive area as it lies within the Green Belt and has very limited access by virtue of being circumscribed by the Cambridge Northern Bypass, the railway and the river. The greater part lies within Milton Parish but the impact of 	 Noted. The area is known to have areas of damp grassland. Noted Noted. Discussion also required with the Planning Policy team 	 Recommended that the CEA3 be extended southwards taking in parts of Chesterton Fen up to the railway line on the western side and the Cam on the east (map to be presented at the meeting). to 4) No change

development falls on Chesterton village, as all traffic has to pass through the village to access Chesterton Fen.
4) I am copying this to the City Council as it is essential that the two authorities adopt a mutually consistent approach to this area that will result in long-term benefit to the settled traveller community in Chesterton Fen and to our members.