



East Cambridgeshire
District Council

**Natural Environment
Supplementary
Planning Document
(SPD) – Reg 12(a)
Consultation
Statement**

Version 2 – adoption stage -
September 2020

1. Introduction

- 1.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Council to consult the public and stakeholders before adopting a Supplementary Planning Document (SPD). Regulation 12(a) requires a Statement to be prepared setting out who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the final SPD. Regulation 12(b) requires that Statement to also be published as part of the formal consultation on the SPD.

2. Consultation Undertaken up to and including 17 February 2020

- 2.1. In preparing this SPD, internal consultation within the Council took place and this resulted in the drafting and refining of the content of the consultation draft SPD. The draft was subsequently considered by Finance and Assets Committee of the Council on 6 February 2020, where it was approved for the purposes of public consultation. The papers for that meeting (including a copy of the draft SPD) were publicly available on the Council's website seven days prior to the meeting taking place.
- 2.2. No external consultation took place on or before 17 February 2020.

3. Public consultation, from 18 February to 30 March 2020

- 3.1. Public consultation started on 18 February 2020 and ended on 30 March 2020. Only comments made during this period were considered.
- 3.2. A copy of the draft SPD was made available for public inspection, free of charge:
- On the Council's website at; <http://www.eastcamb.gov.uk/local-development-framework/supplementary-planning-documents>
 - and at the District Council Offices: The Grange, Nutholt Lane, Ely, Cambs, CB7 4EE between the hours of 8.45am to 5pm from Monday to Thursday, and 8.45am – 4.30pm on Friday;
- 3.3. An email was sent out to all consultees (except to one consultee who was sent a letter with the same information). A copy of the email is attached at appendix A. Nearly 480 emails were sent out. These included statutory consultees, local businesses, local organisations, individuals who wish to be informed of planning documents consultations and other stakeholders (see full list at Appendix B). All the comments we received were via email.

4. Representations received

- 4.1. We received 222 comments from 23 separate organisations and individuals to the Natural Environment SPD. All the comments received are recorded in the table below. The Council has responded to each comment and this is recorded in the Council's Response column. Where changes are proposed to the SPD as a result of these comments, this is clearly shown in the Action Column of the table below. These changes are then included in the adopted version of the SPD.
- 4.2. While most of the comments were seeking changes to the SPD, there were considerable support to the policies in the SPD. Some comments are seeking policies to be more prescriptive requiring developers to provide nature friendly environment while, for example, developers are seeking changes to policies to make them less rigid.

5. Issues Raised during consultation and how they have been addressed

- 5.1 A number of issues were raised in the representations received. The main issues raised (in the order of the document) and changes made are summarised below.
- Overall, lots of supporting representations
 - General updating of the policy and statutory background
 - Adjustment in several places to acknowledge that trees should only be planted in the right places and of the right species, with more harm than good if this is not the case.
 - Significant adjustment to the text relating to 'recreational pressure' on protected sites. This pressure arises from an increase in people in local areas through new development. These changes have been done to the SPD to reflect the latest advice from Natural England. The draft SPD was based on advice from 2018-19 and that advice has subsequently moved on in a significant way. There is now a Cambridgeshire wide approach to dealing with recreational pressure, as adopted by Natural England. The SPD has been adjusted to be consistent with that new position. This includes deleting draft policy SPD.NE3 'Recreational pressure on the designated sites of Devil's Dyke and Breckland' and replacing it with a new Appendix setting out Natural England's standing advice across Cambridgeshire.
 - Addition of a new policy on Soham Commons (SPD.NE4), reflecting their unique character and the fact that a recent detailed Enhancement Study has been prepared for the Commons. The Policy is that which was intended to be included in the recently withdrawn Local Plan.
 - Adjusting Policy SPD.NE7 (doubling land for nature), removing the phrase 'must achieve' what it sets out. Instead, the policy is now setting out a suggested way of meeting Local Plan Policy Env4. As pointed out by some representors, requiring the policy to be met went beyond the scope of what an SPD could do.
 - Removal of the requirement, in policy SPD.NE10 for developers to use the Opportunity Data. First, the SPD could not 'require' this, due to constraints on SPD scope, but secondly that data is not quite ready to be published yet. We can do this separately, on our website, post adoption of the SPD.
 - More generally, several adjustments to policies and supporting text, for clarity and consistency.

Comment ID	Consultee Name Chapter/ Para. No./ Policy No. Support/ Object/ Observation	Comments	Council's Response	Action
NEV-01	BSG ecology 6.29 Observation	<p>Page 22 of the draft Natural Environment SPD considers the Swan and Goose IRZs that you have been advised by Natural England to use as a tool when considering the need for HRA of plans and projects .</p> <p>That IRZ is backed by an evidence base but that evidence base is not accessible to interested parties either within your planning policy document library (https://www.eastcambs.gov.uk/local-development-framework/document-library) nor as part of the submissions published as the [now withdrawn] draft Local Plan went through public consultation and Hearing.</p> <p>My comment (and it should be interpreted as a request) is that the evidence base from which the IRZ was derived should be published alongside the SPD on your website.</p> <p>From paragraph 6.29 of the draft SPD I am presuming that evidence base consists of, as a minimum, the BTO Research Project referred to (highlighted on the screenshot) and it may also consist of the advice from Natural England on how the information contained in the BTO Research Report was interpreted to create the IRZ that now forms part of the SPD.</p> <p>My view is that it is not appropriate for ECDC to include such a matter as an area on a map defining the application of policy without also including as part of its consultation access to the evidence from which the area was derived.</p>	Comments noted. The IRZs are owned by NE. ECDC does not have the ability to publish the evidence behind those IRZs.	No change to SPD
NEV-02	Crime Prevention Design Team Observation	Routes for pedestrians, cyclists and users of the outdoor environment should be integrated and assist easy, intuitive wayfinding through the application of inclusive design by increasing activity and therefore natural surveillance, a proven deterrent to crime and anti-social behaviour. Our office is always happy to be advised and comment as necessary in this regards.	Comment noted.	No change to SPD
NEV-03	Maureen Munks Object	It is welcoming to see East Cambs having real concerns about improving our natural environment and therefore I don't want to sound negative but I do think that the 'net gain' in biodiversity pushing forward for planning approval a bit of a worry.	Comments noted. National policy requires ECDC to pursue 'net gain' in biodiversity and so this objective cannot be excluded from the SPD.	No change to SPD

NEV-04	Maureen Munks Object	I would think that most farmers fields at present would be considered having a net gain in biodiversity if built on, with a lot of fields having not having a lot of wildlife, either from having poor hedgerows or none at all and years of pesticides and chemicals sprayed on the land. Having said that, I would rather see fields than a load of houses and the tide is turning in that farmers are becoming more aware of the need to balance cultivating the land but also making things easier for nature and wildlife to flourish. Also, I cannot see the 'net gain' in biodiversity would be a true picture once housing is built in that with housing comes people disturbing wildlife, cars making more traffic on the roads and pollution etc.	Comments noted. National policy and guidance continues to emerge as to how to fully quantify net gain.	No change to SPD
NEV-05	Maureen Munks Observation	Here in Bottisham it is a nightmare for workers trying to get into Cambridge for work, it can take 40 minutes just to get to Quy roundabout!! Some people leave their house at 7am using the A14 to try and beat the traffic. To allow the building of houses and a school next to Newmarket Park and Ride is just ridiculous making this situation even worse. Surely it is better for the natural environment if developers build on brownfield sites and therefore making a real gain for biodiversity by enriching a site that was already covered in concrete. Campaign for Rural England did a survey in the UK on the amount of brownfield land available and CPRE's annual State of Brownfield report shows that there is enough suitable brownfield land available in England for more than 1 million homes across over 18,000 sites and over 26,000 hectares. View the data from our research here. Of course we know brownfield sites are not the easy option for developers but with Climate Change, flooding and the pressure on land for housing and growing crops to feed us the easy option should no longer be the first option.	Both national policy and Local Plan encourage development on brownfield sites before developing greenfield sites. However, some brownfield sites can be very nature rich, so it is not as simple as it sounds.	No change to SPD
NEV-06	Maureen Munks Observation	We already have acts to protect the natural environment but when you see recent developments such as in Bottisham there is no evidence of habitats being protected, we just have the usual housing squashed together and concrete and tarmac and quite often the Developers make promises that don't materialise and then it is too late or too difficult to bring them to task.	The purpose of the SPD is to make all aware, including developers, of their responsibilities to the natural environment.	No change to SPD
NEV-07	Maureen Munks Object	Finally, re the Cambridgeshire plan the aim to increase the natural environment by 50% by 2050 is of course a fantastic idea but I hope this doesn't mean that these extra natural areas are just pockets of land surrounded by new developments. We need to keep large areas of Cambridgeshire for farming and nature so that when we go out of our urban areas we really feel like we are in the countryside and give wildlife the space it needs to be truly wild.	The Council has endorsed Natural Cambridgeshire Vision to double the area of rich land in wildlife habitat and	No change to SPD

			natural greenspace. Draft Policy NE7 in the SPD outlines how this will be helped to be achieved.	
NEV-08	Becky Lockyer Support	<p>Please find below my response to the current consultation on the draft Natural Environment SPD.</p> <p>I am a resident living within East Cambridgeshire. I take a keen interest in ecological conservation and follow the planning process closely. I would like to see improvements made to the process whereby proposed developments are assessed in terms of impacts upon biodiversity and the delivery of biodiversity enhancements. This is critical in a District where there is considerable pressure on the land for housing and economic development which poses a threat to local biodiversity. This means going beyond a 'bare minimum' approach where, for example, planning permission for a greenfield site may simply require some very basic and perfunctory mitigation measures set out in the ecology report, (such as the retention of existing hedgerows or provision of bat boxes) which are then secured by a compliance planning condition.</p>	Comments noted, and the government approach of 'net gain' is along the lines which you suggest.	No change to SPD
NEV-09	Becky Lockyer NE7 Observation	To address any potential concerns about the impacts of policy NE7 upon development viability, a similar approach could be taken to securing affordable housing provision – where the obligations render a scheme unviable, there shall only be a relaxation of the policy requirements where a developer has submitted a full viability assessment which should then be checked and verified by the Council. Viability considerations are not therefore a problem for the requirements set out in policy NE7.	Comments noted, and viability appraisals do cover the whole spectrum of developer contributions (not just affordable housing)	No change to SPD
NEV-10	Becky Lockyer NE6 Support	I therefore strongly support the adoption of the Natural Environment SPD, which sets a proper commitment to securing biodiversity net gain in line with the requirements of the NPPF and the objectives set out in the Environment Bill. Biodiversity net gain can only be effective if the enhancements are fully implemented and then maintained in perpetuity. Whilst policy NE6 sets a requirement for an 'ongoing management strategy', the policy should clearly state that this will be secured by way of a planning condition or, perhaps more effectively, s106 obligation which can then be enforced.	Noted	No change to SPD
NEV-11	Becky Lockyer NE6 Comments	The SPD sets a number of appropriate policies which I support. I would like to make some comments and suggestions on specific sections or policies as follows:	Comments notes, and ideally this should be pursued, but in	No change to SPD

		<p>Policy SPD.NE6 Biodiversity Net Gain</p> <p>I support the policy, which sets appropriate measures to secure net gain. However, the policy should encourage where possible that biodiversity enhancements seek to offset the loss of the specific habitat types found on the original site. As currently worded, for example, the policy could allow a development to result in the loss of species rich grassland habitat but still on paper achieve a net gain through providing an alternative replacement habitat, such as species rich native hedgerows. Arguably from an ecology point of view the loss of the grassland habitat is the most concerning issue. Therefore, in this instance the policy should require the development to mitigate this as much as possible by replacement meadow planting within the landscaping.</p>	<p>practice it is extremely difficult to precisely replace, like for like, something which is lost. Yes, a like for like would be a starting point, but it may be that the best overall deliverable outcome is for the replacement to be of something different. Or, if the loss is too great, development not proceeding at all, even if a 'gain' can be demonstrated.</p>	
NEV-12	Becky Lockyer NE7 Support	<p>Policy SPD.NE7: Contributing to the strategic target of doubling land for nature</p> <p>I strongly support this policy, which should help to ensure a genuine net gain can be achieved and help to move away from the 'bare minimum' approach.</p>	Comments Noted	No change to SPD
NEV-13	Becky Lockyer NE9 Support	<p>Policy SPD.NE9: Landscaping and Biodiversity</p> <p>I support this policy. I would suggest some additions:</p> <ul style="list-style-type: none"> • Areas of open space which are not intended for recreational purposes (such as a paths or sports pitches) should be sown and managed as species rich wildflower meadow (to resist the tendency for such spaces within developments to be laid as plain turf with limited diversity). • Bird boxes or bricks should be installed on all houses, particularly for birds or local conservation concern such as swifts. • More wildlife ponds should be encouraged within open spaces this is something which is rare to see on new development schemes but would serve as a highly effective biodiversity enhancement. 	<p>Comments noted, however: The first and third bullets are considered covered by the policy, and the best solution may not always be wildflower meadow. The second bullet is explicitly covered in SPD.NE6</p>	No change to SPD
NEV-14	Becky Lockyer NE10 Observation	<p>Policy SPD.NE10: Taking the most appropriate natural environment opportunities</p>	Noted, and generally speaking the policy covers these asks.	No change to SPD

		Where the policy states 'provision which assists in connecting existing habitats' this could go further to state that applicants should be encouraged to consult with the local Wildlife Trust to understand how the site sits links within the 'opportunity maps' network of local habitats and specific measures the development should adopt to help support habitat recovery across the County.	We can't explicitly say consult the Wildlife Trust, as other bodies / companies are equally competent.	
NEV-15	Becky Lockyer Observation	Further general comments Whilst the current Local Plan (2015) does have a policy (ENV7) which promotes opportunities to create, restore and enhance habitats, this policy has not been updated to reflect the latest national planning policy on biodiversity net gain or the provisions set in the Natural Environment SPD. When the Local Planning Authority come to prepare a new Local Plan, this should present an opportunity to update the Local Plan so that the key policy objectives of the SPD have development plan status.	Noted, and agreed, but this is a matter for a future Local Plan, not this SPD	No change to SPD
NEV-16	Becky Lockyer NE7 Comments	Strategic scale developments or 100 dwellings or more or 5ha or more for non-dwellings proposals are normally expected to deliver open space and green infrastructure for good place-making, recreation and wellbeing; therefore, doubling up the use of such spaces for providing wildlife habitat should be perfectly achievable and should not be viewed by applicants and developers as an onerous requirement. Furthermore, in most cases it can be expected that such schemes are of a scale where the delivery of green infrastructure should be viable. In many cases, setting aside 20% of the application site for wildlife habitat will have the effect of reducing the developable area and may therefore have a negative effect on the land value for the developer or land owner. Similarly, if contributions are required for offsite enhancements this may also have a negative effect on land value. However, this should not be an excuse for a relaxation of the policy requirements. Without larger scale developments delivering the requirements of policy NE7, the current decline in local biodiversity will not be reversed and the District will likely fail to meet national policy and statutory requirements.	Comments noted	No change to SPD
NEV-17	Little Thetford Parish Council Comments	Little Thetford Parish Council considered the draft 'Natural Environment' SPD at their meeting on 11th March and have asked me to pass their comments to you. These comments are as follows: <ul style="list-style-type: none"> Councillors feel that this document should apply to all applications 	Comments noted. The SPD will be applied to all applications, including reserved matter applications for sites with outline	No change to SPD

		<ul style="list-style-type: none"> • They would like to know if outline permission has been granted 3 years ago, will the new SPD be applied to this application and how will it be checked it is being adhered to or ? • How can the parish council look at a biodiversity study for the whole village? • Members would like the village's conservation area and pond to be a candidate towards the wildlife rich area as detailed on page 38. 	permission. The Council is not presently in a position to support local studies as described. The candidate site is noted, and the matter of establishing and maintaining such a list is still an ambition but not yet established.	
NEV-18	Witcham Parish Council Comments	The above consultation documents were considered at our meeting on Wednesday. Witcham Parish Council had no comments to make.	Comments noted	No change to SPD
NEV-19	Ely Group of Internal Drainage Board Preface and Section 1 Comments	<p>Preface Page 2: Would recommend that at some point the duty of ECDC with regard to biodiversity (as detailed in the <i>NERC Act 2006</i> and the forthcoming <i>Environment Act 2020</i> is highlighted).</p> <p>Section 1 – Introduction Paragraph 1.2: The point above should be inserted here.</p>	Agreed, it would be helpful to add something in para 1.2, but not page 2 which is a brief simple guide to some of the issues raised in the SPD.	Add at end of 1.2: “The SPD also touches upon issues coming forward in the Environment Bill, January 2020”.
NEV-20	Ely Group of Internal Drainage Board Paragraph 2.2 Comments	After the last two words ‘Principal Importance’ add ‘, otherwise known as Priority habitats and species’ so as to provide the basis for the use of the term later in the document.	Agreed	Add ‘add “otherwise known as Priority habitats and species” within para 2.2
NEV-21	Ely Group of Internal Drainage Board Paragraph 2.3 Comments	Badgers are protected by separate legislation <i>Protection of Badgers Act 1992</i> and this should be included.	Agreed	Add Protection of Badgers Act 1992 to para 2.3.
NEV-22	Ely Group of Internal Drainage Board Paragraph 2.4 Observation	The 2017 Regulations consolidate the <i>Conservation of Habitats and Species Regulations 2010</i> with subsequent amending instruments (including the 2012 Regulation), and make minor modifications reflecting changes to related legislation. Effectively therefore these 2012 Regulations are obsolete.	Agreed	Add to end of para 2.4 “though these regulations are somewhat

				superseded by the 2017 Regulations as described at para 2.6”
NEV-23	Ely Group of Internal Drainage Board Paragraph 2.10 Comments	A point is that this Bill will also strengthen the biodiversity duty of public bodies from ‘conserve’ under the <i>NERC Act 2006</i> to ‘conserve and enhance’. This should be added.	Agreed	In 2.11, cross reference to the NERC Act 2006
NEV-24	Ely Group of Internal Drainage Board Paragraph 3.1 (box) Comments	Suggest amending ‘priority habitats’ to ‘Habitats of Principal Importance as listed under the NERC Act 2006’.	Agreed	Add in (a) of para 3.1: “(especially Habitats of Principal Importance as listed under the NERC Act 2006)”
NEV-25	Ely Group of Internal Drainage Board Table 1 Step 3 Comments	Should include species and habitats of Principal Importance under the NERC Act 2006.	Agreed	Add in Step 3 same text as above for para 3.1
NEV-26	Ely Group of Internal Drainage Board Table 1 Step 5 Comments	A point that should be included is that care should be taken not to reduce the value of existing habitats by planting trees.	Agreed.	In Step 5, at end of first bullet, add: “Also, for trees, care should be taken not to reduce the value of existing habitats by planting trees. New tree planting should be avoided on peat soils, as it is likely to cause

				more harm than good to biodiversity and net carbon emission.”
NEV-27	Ely Group of Internal Drainage Board Table 1 Step 6 Observation	If SUDS are colonised by protected species e.g. great crested newts then this may severely compromise their management so as to achieve appropriate flood and drainage criteria.	Comments noted	No change to SPD
NEV-28	Ely Group of Internal Drainage Board Table 1 Step 7 Comments	It will not be possible to provide the ‘full range’ of breeding sites, shelter and year-round food resources. Suggest amending to ‘an appropriate range’	Agreed	Amend Step 7 to ‘an appropriate range’
NEV-29	Ely Group of Internal Drainage Board Paragraph 6.1	Suggest amendments in red: Most nature sites are identified as falling within a hierarchy of importance, with international (SAC, SPA or Ramsar) sites and then nationally important sites (SSSIs and National Nature Reserves) being at the top of the hierarchy. These sites usually contain rare habitats or species (often both), and are heavily protected through international and national legislation. Comment – they always contain rare habitats and species, legislative protection is what it is – it protects, heavily is irrelevant and implies that other protection can be ignored	Agreed	Amend 6.1 as per suggestion.
NEV-30	Ely Group of Internal Drainage Board Paragraphs 6.4 – 6.6 suggest rewrite as follows for clarity and precision.	<p>6.4 Some nationally designated (SSSI) sites receive additional protection as a ‘Natura 2000 site’. Natura 2000 is a Europe-wide network of sites of international importance for nature conservation established under the Habitats Directive⁵. The network comprises Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). SPAs are designated under the European Directive 79/409/EEC ‘on the Conservation of Wild Birds’ (the Birds Directive) for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species). SACs are designated under the Habitats Directive and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance.</p> <p>6.5 Some SSSIs may (separately or additionally) receive additional protection due to their designation Ramsar sites, under the Ramsar Convention on Wetlands of International Importance, especially as Waterfowl Habitat 1971. (which are separate to Natura 2000 EU related sites, albeit often overlap in terms of designation, where applicable) support as</p>	Agreed, whilst the sentiments are the same, the suggested wording is clearer.	Amend 6.4-6.6 as per suggestion

~~internationally important wetland habitats, and are listed under the Convention (Ramsar Convention, 1971).~~
6.6 Activities within East Cambridgeshire may affect the following sites which hold international designations, some multiple. Full details are given in Appendix 1.

International Designation	Legally under pinned by
Devil's Dyke SAC	Devil's Dyke SSSI
Fenland SAC	Wicken Fen SSSI
Wicken Fen Ramsar	
Fenland SAC	Chippenham Fen component of Chippenham Fen and Snailwell Poor's Fen SSSI
Chippenham Fen Ramsar	
Fenland SAC	Woodwalton Fen SSSI* (located outside ECDC boundary)
Woodwalton Fen Ramsar	
Ouse Washes SAC	Ouse Washes SSSI
Ouse Washes SPA	
Ouse Washes Ramsar	
Breckland SPA	Multiple SSSIs located outside ECDC boundary, buffer zone within ECDC
Breckland SAC	Multiple SSSIs located outside ECDC boundary.

*Although Woodwalton Fen is outside the ECDC district, it is part of the Fenland SAC and as such needs to be considered during any assessment of the impact of any plan or project.

NEV-31	Ely Group of Internal Drainage Board Paragraph 6.6:	Consideration needs to be given to whether a short summary for the reason for designation needs to be given here.	Not considered necessary, especially as the appendices provide commentary on why they are designated.	No change to SPD
NEV-32	Ely Group of Internal Drainage Board Paragraph 6.8:	Suggest: First sentence, after 'process' insert '(a Habitats Regulations Assessment). After 1 st sentence insert 'This process is identified in the Habitats Regulations 2017.' Comment: the process does not determine what the effects might be, it determines, in the first instance whether there will be a likely significant	Agreed	Add to 6.8 as per suggestion.

		effect on a designated site, alone and in-combination with other plans or projects. This paragraph needs revisiting.		
NEV-33	Ely Group of Internal Drainage Board Paragraph 6.11:	<p>IMPORTANT This should be revisited. The wording of the policy does not reflect the legislation and to avoid potential appeals and judicial reviews it should do. In particular, (Paragraph 1) should ECDC be minded to grant planning permission then the government must be notified, and it is for the government to allow the project to proceed and to secure compensatory measures (para 64 of the Habitats Regulations 2017).</p> <p>Paragraph 3- it is an adverse effect on the integrity of the site. It is not clear that para 3 is correct as any appropriate assessment undertaken should be within reasonable scientific doubt as to the absence of adverse effects and it is therefore unlikely that mitigation will be informed by monitoring.</p>	The wording of the first three paragraphs of this policy replicates that found in the recently adopted Peterborough Local Plan, a policy which was negotiated with Natural England and found sound by an Inspector. The end list of (i)-(v) were agreed with Natural England as part of the now withdrawn emerging East Cambridgeshire Local Plan. Nevertheless, some tweaks to the policy are advocated by Natural England, below.	No change to the SPD
NEV-34	Ely Group of Internal Drainage Board Paragraph 6.12:	Inaccurate information provided here. The correct legislation is the Habitats Regulations 2017 . ECDC is the competent authority for this process.	Agreed, the para is in need of updating. NPPG provides suitable text to use.	Update para 6.12, in line with NPPG ID: 65-001-20190722
NEV-35	Ely Group of Internal Drainage Board Paragraph 6.13:	Inaccurate information provided here. Habitats Regulations Assessment (HRA) is a process formed of 4 stages for each international designation. <u>All</u> projects and plans go through the first screening stage – this may be via the biodiversity check list which clearly shows no likely significant effect or formally by a more detailed assessment. It is for ECDC to determine that this has been properly carried out. Essentially this is the ‘should we check’ stage to go on to the more detailed Appropriate Assessment stage.	Disagree. Para’s 6.13-6.15 are written in simple language to help explain the process to non-experts. It is not ‘policy’ or attempting to summarise in legal terms what the law requires. The rest of	Amend 6.13 in line with proposed changes suggested by Natural England (NEV 159).

			the SPD provides the framework for what needs to be done.	
NEV-36	Ely Group of Internal Drainage Board Paragraph 6.16:	There may be proposals for e.g. a pumping station moving water into or out of the Ouse Washes which would need an approval.	Noted, and agreed, but the para itself is accurate.	No change to SPD
NEV-37	Ely Group of Internal Drainage Board Paragraph 6.17.	This is confusing and needs rewording. Suggest: 'For example, increasing development near a protected site may increase visitor pressure leading to adverse effects on vegetation or disturbance to birds. Another example is that it might lead to a loss of important foraging grounds used by birds from a designated site some distance away.'	Agreed, the suggested wording is clearer, shorter and more effective	Amend 6.17 as per suggested text.
NEV-38	Ely Group of Internal Drainage Board Table 2:	This table needs a summary of the features for which it was designated to provide context to the vulnerability. This will be different for each designation and thus the threats may be different for each designation.	Not necessary, as such information is in the appendix	No change to SPD
NEV-39	Ely Group of Internal Drainage Board Paragraph 6.19:	Suggest new last sentence. 'These Impact Risk Zones refer to the SSSIs which underpin the international designation.' Comment: They are not however effective in assessing changes in, e.g., hydrology where effects on an aquifer some miles distant may adversely affect a SAC or for air pollution. Natura England provide further guidance on this. Thus, IRZs are not definitive.	Agreed	Add sentence as per suggestion to 6.19
NEV-40	Ely Group of Internal Drainage Board Paragraph 6.20:	Inaccurate. See comments above.	Agree the paragraph could be improved, and therefore text in 6.20 to be updated in line with Natural England "SSSI Impact Risk Zones User Guidance", June 2019 (namely paras 2-4 of that guidance) ¹ ,	Amend para 6.20 in line with Natural England published text (see footnote below).

¹ "The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and "Compensation Sites", which have been secured as compensation for impacts on European/Ramsar sites.

Local planning authorities (LPAs) have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI. The SSSI IRZs can be used by LPAs to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. The IRZs do not alter or remove the requirements to consult Natural England on other natural environment impacts or other types of development proposal under the Town and Country Planning (Development Management Procedure) (England) Order 2015 and other statutory requirements - see the gov.uk website for further information.

NEV-41	Ely Group of Internal Drainage Board Paragraph 6.25:	Confusing, perhaps combine with para 6.27 and simplify to say. 'Land may be covered by more than one IRZ and the potential for damage and its severity may be different.'	Agreed that the situation is not straight forward, but disagree the suggested text is better, and is probably too simplistic.	No change to SPD
NEV-42	Ely Group of Internal Drainage Board Paragraph 6.29:	Perhaps start by saying what the Goose and Swan IRZ is. The single long sentence is confusing and needs to be broken down.	Agree the sentence is too long and needs breaking down.	Amend 6.29 as per NEV 164 suggested text.
NEV-43	Ely Group of Internal Drainage Board Paragraph 7.3:	Needs rewording as inaccurate. Sentence 1 - the reverse is true – the SSSIs are also designated as international sites. Sentence 2 the boundaries are not the same, e.g. only Chippenham Fen component of Chippenham and Snailwell Poor's is part of the SAC. Last sentence – SSSIs are often notified for a wider range of features than those in the international designation and thus the effects may be different. As with multiple designations e.g. SAC, SPA and Ramsar where the receptors are different and so each designation needs to be assessed separately, so the SSSI needs to be separately addressed.	Agreed.	Amend 7.3 to as follows: "As can be seen from above, a numbers of sites have numerous designations, and the boundaries are not always the same for each designation. Where multiple designations exist, each designation needs to be assessed separately."
NEV-44	Ely Group of Internal Drainage Board Paragraph 7.6:	Can this be checked – our understanding is that the NPPF has precedence.	It is believed that para 7.6 is an accurate interpretation of the law.	No change to the SPD.

The SSSI IRZs can be used by developers, consultants and members of the public, who are preparing to submit a planning application. They will help them to consider whether a proposed development is likely to affect a SSSI and choose whether to seek pre-application advice from Natural England. This will allow any potential impacts to be taken into account within the planning application and so minimise the risk of delays at the formal planning stage. Further information on Natural England's preapplication Discretionary Advice Service (DAS) is available on the gov.uk website". Source: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf

NEV-45	Ely Group of Internal Drainage Board Paragraph 8.9:	Agree.	Comments noted	No change to SPD
NEV-46	Ely Group of Internal Drainage Board Section 9 - Species	Title needs amending to cover Species of Principal Importance which are on the NERC list but which may not be protected.	Agree	Amend section to "Protected Species (Species of Principal Importance)"
NEV-47	Ely Group of Internal Drainage Board Paragraph 9.2:	Current list was updated on 14 th May 2014 on the Natural England web site.	It is understood that the list of habitats of principal importance remains as 2010, but it is agreed that the species list was updated in 2014.	Amend sentence within 9.2 as follows: "The current list contains 56 habitats of principal importance (updated 2010) and 943 species of principal importance (updated 2014)."
NEV-48	Ely Group of Internal Drainage Board Paragraph 9.3:	A desk search via the CPERC is usually required.	Comments noted	No change to SPD
NEV-49	Ely Group of Internal Drainage Board Paragraph 9.6:	Is there a policy for S41 species?	SPD.NE5 covers protected species	No change to SPD
NEV-50	Ely Group of Internal Drainage Board General:	It is important that this is followed as, from an IDB view, it cannot give consent for works that may affect protected species that have not properly been taken into account at the planning stage. This could lead to a situation where the consent is unimplementable.	Comments noted	No change to SPD

NEV-51	Ely Group of Internal Drainage Board Paragraph 10.2:	State of Nature report was updated in 2019 and the figures are different. Those quoted are not quite quoted correctly e.g. the dates were from 1970 to 2013 not 50 years.	Agree, text needs updating	Replace 10.2-10.3 with text in footnote. ²
NEV-52	Ely Group of Internal Drainage Board Paragraph 10.6:	Even though it comes later, the Environment Act 2020 – to be a legislative requirement should be quoted.	Disagree, as there is no certainty such an Act will exist.	No change to SPD
NEV-53	Ely Group of Internal Drainage Board Paragraph 10.9:	Might be better in an appendix.	This is such important text, that considered best to retain where it is.	No change to SPD
NEV-54	Ely Group of Internal Drainage Board Paragraph 10.16:	Clumsy wording, could be clarified	Whilst complex, wording is considered acceptable	No change to SPD
NEV-55	Ely Group of Internal Drainage Board Paragraph 10.17:	There may be a temptation to use public open space or SUDS features to comply with this policy. This should be resisted as the management that is required for these features is likely to be contrary to that required for the creation of rich wildlife habitat. Additionally, the use of the bylaw strip along IDB ditches must not be used for this purpose.	Comments noted	No change to SPD
NEV-56	Ely Group of Internal Drainage Board NE7:	The creation of rich wildlife habitat is contingent on its long-term management over decades. This policy does not fully consider this.	Agree.	Amend NE7 (A) by replacing 'maintenance' with 'long-term management'.

² Amend to: “The UK’s wildlife continues to decline according to the State of Nature 2019 Report. As a summary, the latest findings show that since rigorous scientific monitoring began in the 1970s there has been a 13% decline in average abundance across wildlife studied and that the declines continue unabated. The Report also reveals that 41% of UK species studied have declined, though 26% have increased since 1970, while 133 species assessed have already been lost from our shores since 1500.

Butterflies and moths have been particularly hard hit with numbers of butterflies down by 17% and moths down by 25%. Species that require more specialised habitats have declined by more than three quarters. The UK’s mammals also fare badly with greater than 26% of species at risk of disappearing altogether.”

NEV-57	Ely Group of Internal Drainage Board Paragraph 11.7:	Planting trees can also destroy habitat. For example, planting trees adjacent to a watercourse may reduce vegetation within channel thus affecting invertebrate species and abundance, potentially reducing fish populations and can render banks unsuitable for water voles. It can destroy grasslands and reduce the suitability of land for some species of feeding birds. A further principle should be added to the text to ensure that trees are only planted in the right place. It will be tempting to link watercourses with trees and this may affect satisfactory flood risk management.	Agree	Amend 11.7 to 'six' Tree Planting Principles, and add a new bullet: "Avoid any tree planting where it has the potential to cause harm, such as: harm to existing important habitat; harm to peat soils; or harm to property or infrastructure"
NEV-58	Ely Group of Internal Drainage Board Policy SPD NE8:	There is no justification for the number of replacement trees as given. The value of bigger trees is structure proving habitat for e.g. birds and invertebrates and landscape character, neither of which is covered by the planting of new trees. Denser planting or more extensive planting may damage other areas and is likely to lead to a reduction in the shape and development of those tree planted. On bigger development sites, it may lead to unsuitable planting e.g. by IDB watercourses.	Disagree, and such replacement targets were adopted in the recent Peterborough Local Plan.	No change to SPD
NEV-59	Ely Group of Internal Drainage Board Paragraph 12.3/12.4:	The IDB is concerned about the possibility for green corridors along watercourses to be planted with trees. It will not normally issue consent for planting within 9 metres of an IDB maintained watercourse nor around SUDS features that it is to manage (also see 12.8).	Comments noted, but these are matters for specific applications	No change to SPD
NEV-60	Ely Group of Internal Drainage Board NE9:	Insufficient consideration has been given to the management of landscapes to provide biodiversity gain. There is no gain in creating habitat without this provision and this is a major omission.	Disagree. The second paragraph refers to this point.	No change to SPD
NEV-61	Ely Group of Internal Drainage Board Paragraph 12.8:	See comments on Paragraphs 12.3/12.4. Contrary to the statement on management, willows require regular management and due to cost, this usually lapses. If willows are planted in attenuation ponds, then they will colonise it into wet woodland. This, and difficulty of access will preclude management and the attenuation ponds will cease to function. This policy on willows should be revisited.	Comments noted, but, as an example scenario, the text box at 12.8 is considered to remain sound (but not necessarily	No change to SPD

			appropriate in all circumstances)	
NEV-62	Ely Group of Internal Drainage Board Paragraph 13.1:	Agree	Comments noted	No change to SPD
NEV-63	Ely Group of Internal Drainage Board Paragraph 13.2:	Add flooding.	Flooding could be added, but not strictly necessary	No change to SPD
NEV-64	Ely Group of Internal Drainage Board NE10:	Add flooding	Agree, flooding could usefully be added in the Policy itself	Add a fifth bullet to NE10 as follows: "Provision which assists in reducing or preventing flooding"
NEV-65	Ely Group of Internal Drainage Board Paragraph 14.2 and 14.7:	Will need to be updated to follow the Environment Act 2020. The quote is not correct.	The SPD may well need updating, if/once the Act is in place.	No change to SPD
NEV-66	Persimmon Homes Ltd. NE6 Object	<p>Policy SPD.NE6 of the Natural Environment SPD relates to biodiversity net gain. In effect, it seeks to set out an interim policy to be used prior to the Environment Bill coming into law where new development must provide measurable and "significant" gains in biodiversity. "Significant" is not defined but it is stated that a small "net gain" would not be acceptable. Once the Environment Bill becomes law, the provisions of Policy SPD.NE6 fall away.</p> <p>This policy retrofits via SPD a dated local plan policy based on an approach set out in emerging legislation. The need to provide "significant" net gains in biodiversity is not a feature of current development plan nor national planning policy. Whilst Policy SPD.NE6 stops short of specifying a certain factor by which biodiversity should be improved on any given site, it clearly intends to go much further than current development plan policy and the National Planning Policy Framework.</p> <p>Policy SPD.NE6 cannot be lawfully adopted as an SPD. It is not expanding on an existing policy but providing a quantifiably more onerous approach to securing biodiversity net gains thus acting as a development management policy in its own right.</p>	Disagree. The NPPF requires a net gain. The SPD simply clarifies that 'insignificant' gains would not pass the requirements of the NPPF.	No change to SPD

		Persimmon strongly objects to Policy SPD.NE6.		
NEV-67	Persimmon Homes Ltd. NE7 Objection	<p>Policy SPD.NE7 states that all development proposals of 100 or more dwellings must set aside a minimum of 20% of the application site area as land for rich wildlife habitat. In the alternative, the proposed development must contribute towards off-site rich wildlife habitat broadly equivalent in size to the land area of the application site.</p> <p>Persimmon strongly objects to this policy being introduced via a supplementary planning document. To do so is plainly unlawful. The policy clearly falls within the scope of Regulation 5(1)(a)(i),(ii) and (iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and thus can only be properly adopted as part of a development plan document (DPD).</p> <p>Firstly, it relates to the development and use of land which the local planning authority wishes to encourage – i.e. 5(1)(a)(i). The policy requires 20% of any given site’s area comprising residential development of 100 dwellings or more to be dedicated towards biodiversity enhancement measures. In the alternative, off-site contributions must be provided in lieu of those measures. This clearly relates to “development” (i.e. all development within the stated threshold) and is tantamount to encouraging a use of land (i.e. for biodiversity enhancement).</p> <p>Secondly, Policy SPD.NE7 allocates sites for a particular development or use – i.e. 5(1)(a)(ii). In this case, the sites in question are those of a certain size and the allocation is for 20% of the gross area for biodiversity enhancement or off-site contributions in lieu of.</p> <p>Thirdly, Policy SPD.NE7 is a site allocation and development management policy intended to guide the determination of applications for planning permission – i.e. 5(1)(a)(iv). It sets out criteria which are attempts to deliver the Council’s nature conservation vision thereby regulating development to occur in a particular way. This is a further characteristic of a DPD.</p>	Agree to a certain degree, though it must be remembered that the Local Plan already includes policy ENV7. Nevertheless, and reflecting the legislative restrictions placed on SPDs, amending the opening sentence to make it clear that the requirements in NE7 are options only.	Amend opening line of NE7 to: “A strategic scale development proposal* could, as an option, help demonstrate that it meets Local Plan Policy ENV7 (and in turn demonstrate a contribution to the Local Nature Partnership’s vision to ‘doubling land for nature’) if it achieved either (A) or (B):”
NEV-68	Persimmon Homes Ltd. NE7 Object	<p>In addition to the above, Policy SPD.NE7 would introduce new burdens on development which were not examined as part of the local plan adoption process. Such burdens would have significant impacts on viability which can only be appropriately tested through the local plan process. There is nothing within the SPD to indicate that viability impacts have been tested or considered. Because the viability impacts of such a policy would be quite considerable, this is a further indication that Policy SPD.NE7 is a de facto local plan policy.</p> <p>William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) is relevant. The judgement held that adopting policies with clear viability implications without having fully considered those implications via the DPD process was unlawful. The judgement stated:</p>	See comments above	See amendments above, under NEV 67. The amended wording removes any ‘requirement’ (and hence any possible new burden) on developers.

		<p>“...economic viability as an issue gets more broad brush once one leaves a particular site and seeks to argue the issue more generally. But as NPPF shows, issues such as demand, market conditions and sustainability are all relevant to Local Plan preparation. It is otiose to set housing targets, or seek to encourage the housebuilding industry to provide homes, without addressing whether the policies one seeks to put in place would frustrate those objectives.” [Emphasis Added]</p> <p>For the above reasons, Policy SPD.NE7 cannot be lawfully applied in planning decision-making as it is a local plan policy which has not gone through the appropriate process. It should be removed.</p>		
NEV-69	Persimmon Homes Ltd. NE9 Object	<p>Persimmon strongly objects to Policy SPD.NE9 relating to landscaping and biodiversity. The proposed policy specifies a level of prescription which would be onerous even for a development plan policy and it is noteworthy that it goes considerably further in this regard than the corresponding draft policy (Policy LP20) of the now withdrawn East Cambridgeshire Local Plan Proposed Submission dated November 2017. The details and appropriateness of various landscape treatments will vary from site to site depending on constraints of that particular site having regard to the technical evidence gathered.</p>	<p>Disagree. The Policy is clearly sensible and appropriate practice, which any developer ought to be able to (indeed, want to) positively respond to. It is not prescriptive or onerous.</p>	<p>No change to SPD.</p>
NEV-70	Persimmon Homes Ltd. NE10 Object	<p>Persimmon strongly objects to Policy SPD.NE10 as it is overly vague and is not clear how it would operate in practice or what its purpose is. The policy refers to the need to avoid putting natural environment infrastructure in the “wrong location” and the possible corresponding management problems, facilitation of anti-social behaviour, and highway safety issues this would cause, but clearly these risks can be considered and avoided through the wider urban design process rather than requiring a separate policy. The policy also restates the provisions of SPD.NE9 in relation to ensuring that green infrastructure is connected up in order to maximise benefits. This is unnecessary.</p>	<p>Disagree. The policy is intend to assist developers, and avoid those scenarios whereby developers simply want to ‘tick a box’ in terms of providing natural environment space in their scheme, but with little thought as to whether the most appropriate landscape/open space location or scheme within their site has been chosen.</p>	<p>No change to SPD</p>
NEV-71	Persimmon Homes Ltd. NE10	<p>The last clause of Policy SPD.NE10 refers to the need to consider the Council’s opportunity mapping data. The data is not available as part of this consultation exercise nor is it clear what the data will comprise or how developers will be</p>	<p>Agree, the last paragraph of NE10 (opportunity mapping</p>	<p>Delete the last para of NE10</p>

	Comments	<p>expected to consider this data as part of formulating applications. Whilst it is appropriate to take available opportunities to improve green infrastructure where it is feasible and viable to do so, understanding how best to exploit those opportunities should be considered in a joined-up way and set out as part of a wider strategic planning exercise through a local plan rather than trying to achieve this on an application by application basis via a supplementary planning document.</p>	<p>data) is potentially beyond the scope of SPDs, and, in any event, the Council is not presently able to provide such opportunity mapping data in an easy to use and accessible way</p>	
NEV-72	Historic England Comments	<p>Thank you for your e-mail inviting Historic England to respond to the Supplementary Planning Documents on Custom and Self Build Housing and The Natural Environment.</p> <p>Unfortunately, due to our capacity, we regret that we are unable to comment specifically at this time.</p> <p>We do however recommend that the advice of your local authority conservation and archaeological staff is sought as they are best placed to advise on local historic environment issues and priorities, including access to data, indicate how historic assets may be impacted upon by the Supplementary Planning Documents, the design of any required mitigation measures and opportunities for securing wider benefits for the future conservation and management of the historic environment. If you have specific questions relating to the historic environment that cannot be answered by your local conservation and archaeological specialists, please contact Historic England's regional Development Advice Team, who can be reached on 01223 582749.</p> <p>Although we have not been able to provide a substantive response at this stage, this does not mean that we are not interested in further iterations of the document. Please note that we may still advise on, and potentially object to, any specific development proposal(s) which may subsequently arise from this or later versions of the documents subject to the consultation.</p>	Comments noted	No change to SPD
NEV-73	Professor Peter Landshoff Comments	<p>I do have a comment on your SPD. Can the planning system prevent people covering large areas of their gardens with hard cover?</p>	<p>If the surface to be covered is more than five square metres planning permission will be needed for laying traditional, impermeable driveways that do not provide for the water</p>	No change to SPD

			to run to a permeable area.	
NEV-74	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts Comments	Thank you for consulting the Wildlife Trust on East Cambridgeshire's draft Natural Environment SPD. The Wildlife Trust welcomes the council's stated commitment to the Natural Environment and the production of this document. There is much to commend about the draft SPD, though there are a number of areas where we believe the document might be improved. The Wildlife Trust's comments are set out below, chapter by chapter. <u>Underlined text</u> represents suggested additional or alternative wording and strikethrough text represents text to delete.	Comments noted	No change to SPD
NEV-75	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts Comments	<p>3. Overarching Vision</p> <p>The Wildlife Trust fully supports the vision.</p> <p>The only minor comment we have is that under bullet point 3.1a where the limestone in calcareous (limestone) grasslands should be deleted, as the grasslands in the district are on chalk not limestone geology.</p>	agreed	Change 3.1 a as per suggestion
		<p>4. Step by Step Guide</p> <p>The step by step guide set out in Table 1 is extremely helpful. The Wildlife Trust would only make the following relatively minor changes to improve what is otherwise an excellent guide.</p> <p>STEP 2: Amend the main bullet point as follows:</p> <p><input type="checkbox"/> Complete a suitable Biodiversity Checklist <u>and / or a biodiversity net gain assessment using an appropriate Biodiversity Calculator</u>, which is highly recommended for all applications other than:</p> <ul style="list-style-type: none"> - householder applications; and - most applications which create no additional floor space (though it is recommended for barn conversions). <p>Without <u>these</u>, it may be hard to demonstrate how you can meet the "net gain" national policy requirements.</p> <p><i>For many smaller developments, the County Council biodiversity checklist should suffice. However, other checklists are available and may be more suitable for your particular proposal. It should be possible for a non-specialist member of the public, planning agent, or developer to complete the County Council checklist. <u>Where a biodiversity calculator is required, this will need to be filled in by a competent ecological professional.</u></i></p>	agreed	Change step 2 as per the suggestion
NEV-76	Bedfordshire Cambridgeshire Northamptonshire	STEP 8: Amend the main bullet point as follows:	agreed	Change step 8 as per the suggestion

	re Wildlife Trusts	<input type="checkbox"/> Submit completed Biodiversity Checklist <u>and / or Biodiversity Calculator</u> along with additional protected species survey reports as required (and any EIA reports if necessary).		
NEV-77	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts	<p>5. What sort of nature conservation measures will decision makers look for? The Wildlife Trust fully supports the inclusion of this section as a helpful aide memoir for applicants and only have two minor suggestions for improvements as follows: Bullet point 5 – split into two bullet points to separate out recreational pressures into its own separate bullet point <input type="checkbox"/> Wildlife disturbance and damage through construction, recreation and increased risks of unlawful activities... <input type="checkbox"/> <u>Human recreational pressures resulting in wildlife disturbance and / or damage to the integrity of habitats and their management.</u></p>	Agree	Amend the table at 5.3 as per the suggestion
NEV-78	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts	<p>Bullet point 9 – amend as follows: <input type="checkbox"/> Effects of pet predation <u>and disturbance</u> on important <u>and sensitive</u> species. Add new bullet point as follows: <input type="checkbox"/> <u>Impacts from increased air pollution on designated sites.</u></p>	Agree	Amend the table at 5.3 as per the suggestion
NEV-79	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts NE1, NE2 and NE3 Support	<p>6. Protecting the Most Valuable Sites: Internationally Designated Sites The Wildlife Trust fully supports this section and policies SPD.NE1, SPD.NE2 and SPD.NE3.</p>	Comments noted, though see NEV-167 comments	No change to SPD
NEV-80	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts NE3 Comment	<p>The only changes we recommend is the addition of specific mention of Wicken Fen to Policy SPD.NE3 as follows: Policy SPD.NE3 For major housing related development (as defined by legislation), and especially any such proposal within an assumed 8km zone of influence of <u>Wicken Fen (Fenland SAC)</u>, Devil's Dyke SAC and Breckland SPA... In order for the decision maker to consider the potential recreational effects of a proposal, the following bullet points apply:</p>	Comments noted, though see NEV-167 comments.	No change to SPD

		□ For residential major development...that there would be no significant adverse effect arising from the development via recreational pressures <u>on Wicken Fen, Devil's Dyke or Breckland SAC / SPA</u> (as applicable).		
NEV-81	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts Para 6.37	We suggest that Diagram 4 is renamed <u>Figure 2</u> for consistency	Agree, but superseded by NEV 167	No change to SPD
NEV-82	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts	7. Protecting the Most Valuable Sites: Nationally Designated Sites The Wildlife Trust fully supports this section. However, Chettisham Meadows SSSI has been omitted from the list. The only change we recommend is the correct spelling of Ely <u>Pits</u> and Meadows, in the list of SSSIs.	Agree	Amend text as per suggestion
NEV-83	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts	8. Protecting the Most Valuable Sites: Locally Designated Sites The Wildlife Trust fully supports this section. The only change we recommend is the addition of a specific section on the Soham Commons, using the text from Policy Soham13 in the recent (now withdrawn) East Cambridgeshire Local Plan. Policy Soham13 could become Policy SPD.NE5. If so all subsequent policies will need to be re-numbered.	Agree, though only the half of the policy which related to Soham Commons. Whilst introducing a new policy at this stage, post SPD consultation, would not normally be	Add a new policy (SPD.NE4(B)) and supporting text at end of section 8 as per footnote below ³

³ Soham Commons

Soham has a unique landscape setting, being surrounded by Commons to the east and west. The Commons cover a significant area, and consists of grazing land and meadows, with a number of ponds and waterways. The Commons are a haven for wildlife – but also provide an excellent green network and recreational facility for the people of Soham. As Common land, they are protected against loss or re-use. However, it is also important that development proposals adjoining or close to the Commons respect its character and setting, and do not adversely affect biodiversity or access. Development proposals will also be expected to explore opportunities to enhance biodiversity and access to the Commons. The following policy therefore is included:

Policy SPD.NE5:Soham Commons: The wildlife, landscape and recreational quality of the Soham Commons should be protected and enhanced. Development proposals should demonstrate no significant adverse impact on the quality, character, accessibility and biodiversity value of the Commons. Development proposals in the vicinity of the Commons should explore opportunities to improve biodiversity, access and landscape improvements on the Commons. To assist the preparation of proposals, and the exploration of opportunities, applicants should have regard to the Soham Commons Recreational and Biodiversity Enhancement Study, as endorsed by Natural England and the Wildlife Trust, and, where necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind, make an appropriate and proportionate contribution to the implementation of the actions identified.

			considered appropriate, the policy has been consulted upon and refined via the Local Plan process, with no outstanding objections to this particular policy remaining at the point the Local Plan was withdrawn.	
NEV-84	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts Para 9.4	9. Protected Species The Wildlife Trust fully supports this section. The only changes we recommend are minor revision to paragraph 9.4, 9.5 and a new paragraph on great crested newt district licencing as follows: 9.4 Developers are advised to make use of government guidance...The Cambridgeshire and Peterborough Biodiversity partnership has published lists of <u>which</u> priority species are found in Cambridgeshire and <u>as well as</u> additional species of interest that are locally important...	Agreed	Amend para 9.3 (not 9.4) as suggested.
NEV-85	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts Para 9.5	9.5 ...In certain parts of the district, protected species which are related to wetland habitats, <u>including water vole and otter</u> , may occur...	Agreed	Amend para 9.4 (not 9.5) as suggested.
NEV-86	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts New para 9.9	<u>Natural England are planning to role out their District Level Licencing scheme for Great Crested Newts to Cambridgeshire in 2020. If developers enter into this scheme the approach set out in Policy SPD.NE5 will not apply. However, the choice of whether to use the Natural England District Level Licencing scheme or to use the traditional licencing approach for great crested newts lies with the developer. If a developer continues with the traditional licencing approach, then policy SPD.NE5 will still apply.</u>	In principle, agreed, but a simple cross reference to our website would work better	Add a new para 9.7 along the lines as suggested
NEV-87	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts NE6, NE7 Support	10. Reversing the Decline – A “Net Gain” in Biodiversity The Wildlife Trust strongly supports the inclusion of this chapter and policies SPD.NE6 and SPD.NE7. We do however have a number of suggestions for improvements to this chapter and these are set out below.	Comments noted	No change to SPD

NEV-88	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts Paras 10.12 to 10.15 Comments	Amend to reflect the fact that the Environment Bill has been published.	Agreed	Amend 10.12 slightly to reflect latest situation with the Environment Bill
NEV-89	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts NE6 Comments	Para 6 – Demonstrating the value of the habitat (pre and post development) will be the responsibility of the applicant, and the information to be supplied will depend on the scale and <u>type</u> degree of proposals being submitted. The Council strongly recommends the use of available toolkits <u>or biodiversity calculators</u> (see section 14 of this SPD) and / or ecology surveys.	Agreed	Amend as per suggestion
NEV-90	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts NE7 Comments	<p>Policy SPD.NE7 - re-write as below All strategic-scale development proposals* must either achieve (A) or (B) as part of the development's contribution to making the Local Nature Partnership's vision to "double nature" a reality:</p> <p>A. Achieve a minimum 20% biodiversity net gain as measured through a recognised biodiversity calculator.</p> <p>OR</p> <p>B. Achieve a minimum 10% biodiversity net gain and set aside a minimum of 20% of the application site area as land for rich wildlife habitat. Such set aside land must have clear proposals for its creation and maintenance. Where the application site already contains rich wildlife habitat which is to be protected as part of the development proposals, then the 20% requirement for rich wildlife habitat applies to land which is not presently rich wildlife habitat.</p> <p>Where the biodiversity net gain requirements cannot be achieved on-site, the applicant will, via an appropriate legal agreement, create sufficient new rich wildlife habitat off-site to achieve the required % biodiversity net gain. Such off-site land must not presently be rich wildlife habitat, and such land must have clear proposals for its creation, maintenance for a period of at least 30 years, and where appropriate details of future public access. East Cambridgeshire will produce either alone or with neighbouring authorities a local Nature Recovery Strategy with a list of priority biodiversity opportunity areas. In the absence of such a published list, off-</p>	<p>Partially support, though note NEV-67, and also the need to avoid conflict or confusion with NE6.</p> <p>Preparation of a local Nature Recovery Strategy is a matter separate to this SPD.</p>	Amend NE7 to incorporate the principle of hierarchy identified in the representation.

		<p>site land should be located according to the following sequential hierarchy. Applicants will need to demonstrate how they have followed the hierarchy:</p> <ol style="list-style-type: none"> 1. Land within East Cambridgeshire district adjacent to strategically important biodiversity areas as identified in the Cambridgeshire Green Infrastructure Strategy (2011). These strategic areas include the Wicken Fen vision area, the Ouse Washes, Chippenham Fen, and Devil's Dyke. 2. Extensions to other nature-rich sites within East Cambridgeshire district, ideally within the parish or town where the development is located. 3. Land within East Cambridgeshire providing new habitats as stepping-stones between existing nature-rich sites, ideally within the parish or town where the development is located. 4. Land outside East Cambridgeshire, if it is within 5km of the development site, in the same landscape character area, and represents the closest or best opportunity to the development site. <p>For all other development proposals not covered by the above, the council will give considerable weight in favour of proposals which create new rich wildlife habitat but only if such provision forms part of delivering a wider net gain for biodiversity. <i>*defined as 100 dwellings of more, or 5ha of more for non-dwelling proposals</i></p>		
NEV-91	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts New Para 10.20	<p>Add <u>The strategically important biodiversity areas in East Cambridgeshire are shown in Figure 3.</u></p> <p>Add a map showing the strategically important biodiversity areas, possibly a map from the Cambridgeshire Green Infrastructure Strategy (2011), or a modified version of the map used in the Developing with Nature Toolkit, which the Wildlife Trust would be pleased to advise East Cambridgeshire DC about.</p>	Not strictly necessary, but potentially something which could be added to the website in due course	No change to SPD
NEV-92	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts NE8 Support	<p>11. Trees and Woodlands</p> <p>The Wildlife Trust supports this chapter and policy SPD.NE8, and in particular the references to ancient woodland, veteran trees and the 5 principles for new tree planting.</p>	Comments noted	No change to SPD (though changes proposed to this section via other comments)
NEV-93	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts Chapter 12 Support	<p>12. Landscaping and Biodiversity</p> <p>The Wildlife Trust fully supports this chapter and policy SPD.NE9, which aims to integrate nature friendly practices into the urban environment, including provision of breeding, foraging and sheltering habitat features to support a range of species that use the urban environment alongside people. We also fully support the inclusion of the example of the value of willow trees within a SUDs system.</p>	Comments noted	No change to SPD

NEV-94	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts NE10	<p>13. Taking the most appropriate opportunities</p> <p>The Wildlife Trust supports this chapter and policy SPD.NE10. We do however suggest that the policy wording is amended as follows, to reflect our suggested wording in chapter 10 and policy SPD.NE7:</p> <p>Policy SPD.NE10 – <u>re-write</u> third paragraph as below</p> <p>For strategic-scale developments* the applicant must consider the opportunity mapping data available on our website**, <u>the strategically important biodiversity areas as identified in the Cambridgeshire Green Infrastructure Strategy (2011) (the Wicken Fen vision area, the Ouse Washes, Chippenham Fen, and Devil's Dyke)</u> and if an opportunity area is highlighted which <u>one of these strategically important biodiversity areas</u> is on or near the application area, demonstrate how the proposal has <u>considered contributing to these areas</u> such an opportunity, to the degree it is reasonably able to do so.</p>	Whilst the Council has sympathy with the intentions suggested, it is considered that it would go beyond the legal ability of an SPD. As such, this suggestion will be reserved for any future Local Plan or other appropriate document. See also NEV 71	No change to SPD
NEV-95	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts	<p>14. Information to be submitted and making use of Toolkits</p> <p>The Wildlife Trust supports the inclusion of this chapter, which is helpful to potential applicants. We do however suggest that an additional section is added at the end covering the use of biodiversity calculators.</p>	Comments noted	No change to SPD
NEV-96	Bedfordshire Cambridgeshire Northamptonshire Wildlife Trusts New Para 14.14	<p>Biodiversity Calculators</p> <p>14.14 <u>There are a number of biodiversity calculators available for use. The Defra Biodiversity Metric 2.0 is one option that is currently being tested and continually refined (see chapter 10). An alternative is the biodiversity impact assessment calculator developed by Warwickshire County Council. This has been operational for a number of years, is tried and tested, and local partners in Cambridgeshire have adapted the list of habitats so they are appropriate for Cambridgeshire. The template for this biodiversity calculator is available from the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire.</u></p>	Agree	Amend text as per suggestion
NEV-97	Huntingdonshire District Council Comments	Huntingdonshire District Council are pleased to note that both SPDs take a very proactive stance to support the natural environment and encourage custom and self-build housing. Huntingdonshire look forward to working with East Cambridgeshire on any cross boundary projects that may arise.	Comments noted	No change to SPD
NEV-98	Reach Parish Council Support	Both supplementary planning documents, approach to the natural environment and, the Custom and Self-build housing SPD, were discussed at the Reach Parish Council meeting on the 4 th March 2020. The outcome of these discussions were that the council is in support and endorses both documents.	Comments noted	No change to SPD

NEV-99	National Trust Comments	The Trust has previously commented on the East Cambridgeshire Local Plan 2016-2036 (withdrawn) and related EiP Matters. Our concern at that time focused on Wicken Fen Nature Reserve and whether emerging Local Plan policy for biodiversity and green infrastructure took adequate account of cross boundary issues. Following the decision to withdraw the submission draft Local Plan those concerns remain in relation to the adopted Local Plan.	Comments noted	No change to SPD
NEV-100	National Trust Comments	We therefore welcome the publication of the draft Environment and Nature SPD which sets out current and emerging nature conservation priorities for East Cambridgeshire and will ensure that planning guidance supports the Council's vision for the natural environment. In commenting on the draft document we have used italicised text to highlight specific issues which in our view are not fully addressed, and where additional guidance would be helpful.	Comments noted	No change to SPD
NEV-101	National Trust Comments	By way of background, Wicken Fen National Nature Reserve is a designated SSSI, and an internationally designated SAC and Ramsar. It has been in the care of the National Trust since 1899 and comprises a mosaic of undrained fen, known as the Ancient Fen, reed bed and wet grassland. Today, the Trust owns and manages some 250 ha of land which supports nationally important populations of wetland birds, including large numbers of waterfowl, breeding waders and other scarce species such as bittern and marsh harrier, as well as many rare plant and insect species. The Trust's long term management plans for the Wicken Fen Vision Area extend southwards across a further 5,300 ha of land and will bring opportunities for access and habitat creation closer to proposed growth locations around Cambridge, including the planned New Town at Waterbeach and Cambridge East.	Comments noted	No change to SPD
NEV-102	National Trust Paras 1.2 – 1.4 Comments	We welcome the inclusion within the SPD of guidance relating to the recently adopted Local Nature Partnership (LNP) vision to 'double land for nature' by 2050 across Cambridgeshire, however we question whether it is sensible to exclude provision for green infrastructure from the scope of the SPD. In our view, it would be more helpful if the SPD took account of the wider benefits of habitat creation, and the relationship between access to multi-functional greenspace, place-making, and wellbeing. We note that the SPD includes several references to green infrastructure, and comment further on related issues below.	Comments noted, but in an attempt not to over complicated the SPD, green infrastructure is not included. Such infrastructure remains, of course, important, but the Local Plan and the 2011 Strategy referred to remain in place.	No change to SPD
NEV-103	National Trust Paras 2.19 – 2.21	It would be helpful to include reference to the Cambridgeshire Green Infrastructure Strategy (2011). The Strategy recognises the inter-relationship between biodiversity, well-being, and green infrastructure, and has been agreed by the	Comments noted – see above.	No change to SPD

		<p>Green Infrastructure Forum, of which East Cambridgeshire District Council and LNP partner organisations are all members. Emerging initiatives may in due course supersede the 2011 Strategy, nevertheless it ‘provides a valuable framework for considering strategic green infrastructure in East Cambridgeshire’ (paragraph 7.6.2, East Cambridgeshire Local Plan).</p> <p>The Green Infrastructure Strategy aims amongst other things to reverse the past decline in biodiversity and identifies a number of key strategic projects, one of which is the Wicken Fen Vision Area. Adopted Local Plan policies GROWTH 3 identifies the Wicken Fen Vision as a key infrastructure requirement and policy COM 5 (Strategic Green Infrastructure) supports projects which are consistent with the Green Infrastructure Strategy.</p> <p><i>This section of the SPD should take account of the Cambridgeshire Green Infrastructure Strategy (2011) and Local Plan Policies GROWTH 3 and COM5 as providing relevant policy context.</i></p>		
NEV-104	National Trust Para 3.1	<p>The Overarching Vision should set clear and ambitious targets for biodiversity and nature recovery and we welcome the commitment in draft policy to promoting an effective, functioning ecological network that links to wildlife rich sites in adjoining local authority areas. The Vision should also identify strategic priorities for nature conservation in East Cambridgeshire. In part, this should reflect priorities identified in the Cambridgeshire Green Infrastructure Strategy, referenced above, but it should also reflect emerging partnership initiatives which offer cross-boundary opportunities to deliver land-scale biodiversity gain for Cambridgeshire.</p> <p>We note that page 2 of the draft SPD highlights the importance of parts of the district for wildlife and protected sites, stating that ‘Wicken Fen is probably the best known, and home to all kinds of rare plants and animals’ and welcome recognition of Wicken Fen and its significance. We believe that a joint cross boundary approach is needed to bring forward the Wicken Vision Area and we support the work of Cambridge Past Present and Future (CPPF) and the Wildlife Trust aimed at creating a Nature Recovery Network for Cambridge within a 10km radius of Cambridge; details can be found here: https://www.cambridgeppf.org/Blog/a-nature-recovery-network-for-cambridge.</p> <p><i>The SPD Vision should support initiatives which build on the Cambridgeshire Green Infrastructure Strategy and promote a co-ordinated approach to help deliver a strategic cross-boundary Nature Recovery Network for the Cambridge sub-region.</i></p>	<p>Comments noted – see above.</p> <p>Preparation of a local Nature Recovery Strategy is a matter separate to this SPD.</p>	No change to SPD
NEV-104	National Trust Step by Step Guide (Table 1)	<p>The Recommended Approach to planning applications provided at Table 1 is helpful. We would endorse in particular the need for design to take account of context and wider landscape and ecological networks, and for applicants to implement appropriate management and monitoring measures, as advised at Steps</p>	<p>Comments noted, but the council prefers to avoid s106 off site contributions as much as possible.</p>	No change to SPD

		<p>4 and 9 respectively. We also welcome recognition that management and monitoring may require a long-term approach.</p> <p>However, we question whether the use of Section 106 contributions to assist in the delivery of a nearby project should be considered 'exceptional'. In our view, contributions to appropriate off-site projects can be a very effective way to achieve biodiversity gain and can deliver significant benefit to local communities, indeed draft policy SPD.NE7 makes provision for this.</p> <p><i>S106 off-site contributions may be justified where development impacts on SSSIs, CWSs and future Nature Recovery Network sites and should not be regarded as an 'exceptional' measure.</i></p>		
NEV-105	National Trust Para. 5.3	<p>Development inevitably gives rise to a range of off-site impacts and these often include visitor related impacts on wildlife habitats and biodiversity. We note that the potential impacts listed at paragraph 5.3 is not comprehensive, and that policy SPD.NE1 addresses this issue at internationally designated sites, however, recreation impacts are not confined to such sites should be included as an issue which may arise elsewhere.</p> <p><i>The SPD should identify potential recreational/ visitor impacts at paragraph 5.3.</i></p>	Recreational pressure is already listed at 5.3 table	No change to SPD
NEV-106	National Trust NE1 Support	<p>We support the approach set out in Policy SPD.NE1: Conserving and Enhancing Biodiversity - Internationally Designated sites; in particular we are pleased to see the inclusion of access and visitor management measures in the list of potential impacts requiring mitigation.</p>	Comments noted	No change to SPD
NEV-107	National Trust NE3 Comments	<p>Draft Policy SPD.NE3: Recreation pressure on the designated sites of Devil's Dyke and Breckland refers to the Cambridgeshire Green Infrastructure Strategy (2011 or successor document) in setting out the Council's approach to mitigating recreation impacts from development, but this only addresses the issue at the specified sites. We are pleased to note that Table 2 (page 20) identifies Natura 2000 site vulnerabilities and includes disturbance and Recreational pressures amongst potential impacts that could arise at Wicken Fen. We welcome recognition of this vulnerability which is consistent with the findings of a recent study of recreational activity at Wicken Fen; the study was conducted by Footprint Ecology and their report is attached with this consultation response. In our view the SPD should take a consistent approach to all designated Natura 2000 sites where there is a known vulnerability.</p> <p>The Footprint study indicates that the growth in visitor numbers originating from locations in both South and East Cambridgeshire at Wicken Fen is likely to be significant. Whilst our strategy for the Reserve area makes reasonable provision for increased visitor numbers, the new car park capacity at the main entrance does not fully address the scale of predicted visitor use across the site. The comments made in respect of Wicken Fen at paragraph 6.37 are therefore misleading; it would be</p>	See NEV-167 comments	See NEV-167 comments

		<p>more correct to state that the Trust's long-term management strategy for the Vision Area aims to alleviate the growing pressure on vulnerable habitats within the SSSI, and to better protect areas at risk from the effects of trampling and other harmful activities. However, it is important to bear in mind that this remains a long term ambition and can only be delivered with the support of landowners and others.</p> <p><i>SPD policy should therefore include a policy which makes provision for mitigating potential recreation impacts at Wicken Fen arising over the Plan period. In our view developers should consider, and where appropriate contribute towards, mitigation measures which are necessary to alleviate the impact of recreational use likely to arise from development. We would welcome further dialogue with the Council and Natural England, with a view to identifying development locations likely to present a risk.</i></p>		
NEV-108	National Trust NE6 Comments	<p>We welcome the approach to securing biodiversity net gain but consider that a 'significant gain' should be defined, and that there is broad support for a measurable 20% net gain in biodiversity across Cambridgeshire.</p> <p><i>The SPD should set a target 20 % net gain requirement in policy, consistent with the LNP's Vision and the Council's support for the LNP's target of doubling land for nature by 2050.</i></p>	Comments noted, but it is beyond the scope of an SPD to be so specific.	No change to SPD
NEV-109	National Trust NE7	<p>We support the approach to ensuring that strategic scale development proposals contribute to the target of doubling land for nature set out at Policy SPD.NE7. For clarity, we suggest that a reference to Section 106 contributions is included under requirement (B).</p> <p>The National Trust is committed to working with landowners and others in driving forward delivery of the Wicken Fen Vision area as part of a 'Nature Recovery Network' and we are currently considering suitable candidate sites for inclusion under the provisions of this policy.</p>	Comments noted	No change to SPD
NEV-110	National Trust NE8	<p>We welcome the broad approach to trees and woodland set out in this policy, however we consider that policy for new trees and woodland should refer to proposals for a Nature Recovery Network and provide a stronger steer towards creating new woodland which links to existing woodland, green corridors, and similar habitat creation schemes. To optimise the carbon storage benefits of woodland planting the policy should facilitate a strategic approach to such schemes consistent with potential opportunities identified in other policies.</p>	<p>Comments noted, but the ask sought goes beyond the scope of the SPD.</p> <p>Preparation of a local Nature Recovery Strategy is a matter separate to this SPD.</p>	No change to SPD
NEV-111	National Trust NE9	<p>We welcome the approach to landscaping and biodiversity set out in this policy, however we consider that the policy should refer to district wide ambitions for nature recovery and net gain and provide a stronger steer towards creating new habitat which links to existing green infrastructure and contributes to habitat creation targets. It should also cross reference related policy, notably policies</p>	Comments noted, but the ask sought goes beyond the scope of the SPD.	No change to SPD

		SPD.NE7, 8 and 10, and facilitate a strategic approach to biodiversity gain and carbon sequestration in landscaping schemes.		
NEV-112	National Trust NE10	We welcome the approach to natural environment opportunities set out in this policy, however we consider that the policy should refer to wider ambitions for nature recovery and net gain and provide a stronger steer towards creating new habitat which links to existing green infrastructure and contributes to habitat creation targets. It should also cross reference related policy, notably SPD.NE7, 8 and 9, and facilitate a strategic approach to biodiversity gain in landscaping schemes. <i>Read together, Policies SPD.NE7, 8, 9 and 10 should facilitate a strategic approach to biodiversity requirements and developer contributions to priority habitat creation schemes.</i>	Comments noted, but the ask sought goes beyond the scope of the SPD.	No change to SPD
NEV-113	National Trust	In conclusion, we believe the publication of the draft SPD provides an opportunity to raise the scale of green space ambition for East Cambridgeshire. In responding to this consultation we have focused on the special significance of Wicken Fen SSSI and Nature Reserve, and on the Trust's long term strategy for the wider Vision area. A plan of Wicken Fen and the Vision Area is attached and further information is available if required.	Comments noted	No change to SPD
NEV-114	Gladman Developments Ltd. Comments	Gladman take the opportunity to remind the Council that SPDs cannot be used as a fast track mechanism to set policies and should not be made with the aim of avoiding the need for examination or reinventing existing planning policy which should be examined. SPDs are not subject to the same degree of examination and consultation as policies contained in Local Plans and therefore should only provide additional guidance to those bringing forward development proposals across the District. The NPPF 2019 confirms this where it defines SPDs as: "documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary Planning Documents are capable of being a material planning consideration in planning decisions, but are not part of the development plan." The role of the SPDs should therefore be to provide guidance on existing planning policy contained in the adopted Development Plan. It is important to note that this does not present an opportunity to reinvent the existing planning policies contained in the local plan.	Comments noted	No change to SPD
NEV-115	Gladman Developments Ltd.	Gladman note that the relevant policy in the adopted East Cambridgeshire Local Plan is Policy ENV7 (Biodiversity and Geology). The introduction to this SPD at paragraph 4.1 notes that " <i>the rest of this SPD sets out a wide range of policy requirements, guidance, suggestions and links to other documents.</i> " Similar to comments made to the draft Self Build and Custom Build Housing SPD Gladman reiterate that whilst it is important that this SPD refers to existing policy	Comments noted	No change to SPD

		requirements it is critical that this document is not itself seeking to create policy. Instead the SPD should be providing additional guidance to policy which already exists and has been tested through the Local Plan examination process.		
NEV-116	Gladman Developments Ltd. Para.10.13	Part 10 of the draft SPD refers to biodiversity net gain and makes reference to the NPPF paragraphs in relation to this as well as guidance set out in the PPG and also the January 2020 Environment Bill. Gladman are supportive of the national policy context being provided in the SPD and the inclusion of the relevant references within this SPD. Gladman specifically note paragraph 10.13 of the consultation document which states “ <i>With some uncertainty over the Environment Bill (and the subsequent Act), the final version of this SPD will need to be updated to reflect the latest position.</i> ” Gladman agree that the final version of the SPD will need to reflect the latest position but also suggest that it should be flexible enough to respond to any changing circumstances in national policy and guidance.	Comments noted	The SPD will be updated to reflect the latest situation with the Environment Bill (it is at the time of writing at the ‘Committee’ stage, therefore some way of completing.)
NEV-117	Gladman Developments Ltd. NE6	Gladman note that within Policy SPD.NE6 the document sets out that only in exceptional circumstances, the Council may accept off site biodiversity net gain provided that: <ul style="list-style-type: none"> • it is not possible to provide significant net gains on site; • the overall net outcome is a significant net gain in biodiversity; and • a robust agreement is in place to deliver and maintain such off-site gains. Gladman welcome this exception to the general position and note that if off site mitigation provides the best opportunity for biodiversity gain, then the policy should be flexible enough to allow for this and it should not be ruled out from the planning application process.	Comments noted	No change to SPD
NEV-118	Gladman Developments Ltd.	Gladman submit that in relation to achieving biodiversity net gains that it is important that the long term impacts are considered taking into account that many of the measures provided as part of the development will need to mature beyond the build period.	Comments noted	No change to SPD
NEV-119	Cambridgeshire County Council	Geology The Cambridgeshire Geological Society is currently assessing the potential for sites across Cambridgeshire to be designated as Local Geological Sites, as well as undertaking other work streams on local geology. We therefore recommend they are consulted on this natural environment SPD to ensure that local geological interest is adequately considered.	Comments noted. The SPD consultation stage was open to all to make comments on it.	No change to SPD
NEV-120	Cambridgeshire County Council	Biodiversity Title page The photograph shows a family of Mute Swans. The Mute Swan is a very common species and therefore, we suggest it would be better to use the photo as an opportunity to showcase the important species / habitats that are found in East	Comments noted, but not deemed necessary. The SPD is not exclusively for ‘rare’ species.	No change to SPD

		Cambs. For example, East Cambridgeshire has internationally important sites for Bewick and Whooper swans (swans with yellow beaks).		
NEV-121	Cambridgeshire County Council Para. 2.6	We recommend that legal advice is sought as to the referencing of “The Conservation of Habitats and Species regulations 2017” because we understand it should be referred to as “ <i>The Conservation of Habitats and Species regulations 2017 (as amended)</i> ” in order to take account of subsequent changes.	Comments noted, but not deemed necessary.	No change to SPD
NEV-122	Cambridgeshire County Council Para. 2.11	An important aspect of achieving Biodiversity Net Gain is securing adequate management of the habitats to deliver the target condition of the habitats. Developments should therefore commit / be required to undertake management and monitoring of a BNG scheme until the target habitat conditions have been achieved. The length of time this will take will vary with the different habitats (see Defra 2.0 metric for example). There is an expectation from the government, set out in the example Environment Bill currently going through parliament, for development to undertaken at least 30 years management.	Comments noted.	No change to SPD
NEV-123	Cambridgeshire County Council Para. 2.21	Cambridgeshire County Council’s Climate Change and Environment Strategy has been adopted.	Comments noted.	Para 2.21 to be updated
NEV-124	Cambridgeshire County Council Para. 3.1	ECDC over-arching vision should include conservation (including enhancement) of non-statutory and statutory nature conservation sites and any associated function land. Paragraph 15 of NPPF requires “succinct and up-to-date plans”, and therefore we recommend that the ecological information upon which the SPD is based is also up-to-date. For example, the current County Wildlife Sites Register SPD was produced in 2010 and many sites haven’t received site assessments in the interim period – CWS should be assessed every 5 years to confirm whether or not they continue to be of county importance. The vision should also account for the conservation of species of importance, including priority species, notable species and Cambridgeshire and Peterborough Additional Species of Interest.	Comments noted, but these are matters for other documents. There is also no need for the vision to set out such species.	No change to SPD
NEV-125	Cambridgeshire County Council Para. 3.1b	The County Council recommend reference is made to the Cambridgeshire & Peterborough Habitat Opportunity Mapping work undertaken by Cambridgeshire and Peterborough Biodiversity Group, for which ECDC is a partner organisation – http://www.cpbiodiversity.org.uk/opportunity-mapping .	Agree	Add new para at 13.3, which provides a link to the opportunity mapping report.
NEV-126	Cambridgeshire County Council Table 1	Step 2 – the County Council Biodiversity Checklist is out-of-date because it doesn’t take into account Biodiversity Net Gain.	It is acknowledged that various checklists will need to be	No change to SPD (other than changes as a

		<p>We therefore recommend that ECDC develop their own Biodiversity Checklist, which is specific for the area of the plan, with specific section on Biodiversity Net Gain (or requirement to undertaken BNG assessment using Defra 2.0 metric). The following resources may be of assistance:</p> <ul style="list-style-type: none"> - CIEEM / ALGE have produced an Ecological Impact Assessment checklist, that could also be used - https://cieem.net/wp-content/uploads/2019/11/EcIA-Checklist.pdf - Biodiversity in Planning have produced a free online Wildlife Assessment Check for householders and small-med developers to check whether they will need expert ecological advice before submitting a planning application - https://www.biodiversityinplanning.org/wildlife-assessment-check/ <p>We also recommend that developments are encouraged to complete the Cambridgeshire & Peterborough Local Nature Partnership's Developing with Nature Toolkit. The document is targeted towards major developments - https://naturalcambridgeshire.org.uk/projects/developing-with-nature-toolkit/. A complimentary document for smaller-scaled developments is currently being developed.</p>	continuously renewed, but not appropriate for ECDC to 'go it alone' and prepare its own checklist. The latter two weblinks are already included in section 14	consequence form other representations)
NEV-127	Cambridgeshire County Council Table 1 Support	<p>STEP 6. We support the requirement for post-development management and ecological monitoring until the target habitat / species / green-space has achieved a satisfactory establishment. This is likely to take significantly longer than 5 years. It would be beneficial to work with the Local Nature Partnership and Local Authority ecologists across Greater Cambridgeshire to create a set of agreed management times for different habitat types etc. that can be applied consistently throughout the Cambridgeshire and Peterborough. As a starting point, the Environment Bill (currently going through parliament) demonstrates the government expectation of at least 30 years management.</p>	Comments noted.	No change to SPD
NEV-128	Cambridgeshire County Council NE1	<p>Policy SPD.NE1 is supported, particularly in relation to ensuring alternative greenspace to reduce potential impact of recreational pressure. It is recommended that a detailed assessment of recreational pressure on wildlife sites be undertaken to identify what would be deemed to be acceptable levels of increased visitor numbers on these sites and appropriate level of mitigation / compensation.</p>	Comments noted.	No change to SPD
NEV-129	Cambridgeshire County Council NE2 Support	<p>Policy SPD.NE2 is supported and welcome the requirement of HRA AA for development within Goose and Swan IRZ. Consideration should also be given to development outside of the Goose and Swan IRZ, which could potentially affect it, such as air, noise or light pollution. Reference to Conservation (of Habitats and Species) Regulations 2010 (as amended) should be updated to reflect the latest changes to legislation.</p>	Comments noted.	Regulations to be updated (as per earlier comments)

NEV-130	Cambridgeshire County Council NE3 Support	Policy SPD.NE3 is supported. We welcome consideration of recreational pressure on international sites. As previously stated, it is recommended that a detailed assessment of recreational pressure on wildlife sites is undertaken.	Comments noted. See NEV-167 comments	No change to SPD
NEV-131	Cambridgeshire County Council Para. 7.9	We support the proposal to consider recreational impact on SSSIs and, as stated above, seek that ECDC undertakes a detailed assessment of potential impact of development on all national designation sites.	Comments noted. See NEV-167 comments	No change to SPD
NEV-132	Cambridgeshire County Council NE4	Policy SPD.NE4. We are disappointed that the policy for local wildlife sits does not go further than local plan policy ENV7. There appears to be no mitigation hierarchy applied (avoid, mitigate, compensate) or mechanism to ensure any loss of adverse impact on a locally important site is compensated through ENV7. This is particularly concerning given ECDC's commitment to Natural Cambridgeshire (Local Nature Partnership's) 'doubling nature' and reversing the biodiversity decline. We therefore seek that SPD.NE4 be reviewed and require development to avoid impact on a designatory feature and where this is not possible, adequate mitigation is undertaken. Any residual impact on these local sites should be adequately compensated.	An SPD is not permitted, in law, to 'go further' than a Local Plan. The Local Plan adequately already addresses these issues.	No change to SPD
NEV-133	Cambridgeshire County Council NE5	Policy PD.NE5. We are disappointed that the policy only includes Protected Species. Given the scale of biodiversity decline, ECDC commitment to doubling nature and the LPA's statutory requirement to have due regard to the conservation of species / habitats of principle importance under NERC Act (as well as stronger requirements under the emerging Environment Bill), we would recommend that greater consideration is given to the protection of priority habitat / species and locally important habitats / species through this SPD. We therefore seek that priority species or habitats and locally important species / habitats (including red-list species and species on the Cambridgeshire and Peterborough Additional Species of Interest and local BAP habitats) be included within Policy PD.NE5. Where a development has the potential to impact on priority or locally important habitat / species, an adequate level of survey work and assessment of impact should be undertaken. New developments should seek to provide priority habitat and/or habitats that will support the entire lifecycle of priority / locally important species. As an example, we would refer ECDC to SCDC's local plan policy NE/6.	An SPD is not permitted, in law, to go further than a Local Plan.	No change to SPD
NEV-134	Cambridgeshire County Council NE6	Policy SPD.NE6 Biodiversity Net Gain is supported but we seek that further clarification is given to confirm what level of Biodiversity Net Gain is considered to be 'measurable'. In the Government's Environmental Bill (currently going through parliament) a 10% Biodiversity Net Gain is required for development. While this is a good baseline nationally, it doesn't reflect that Cambridgeshire and Peterborough have a more impoverished natural environment than most of England.	An SPD is not permitted, in law, to 'go further' than a Local Plan. Setting a 20% target would do so. ECDC hopes that	No change to SPD

		<p>Consequently local authority ecologists and Wildlife Trust agree that a 20% BNG target should be better.</p> <p>Defra's 2.0 metric for calculating BNG is weighted towards schemes that deliver strategic nature conservation benefits and therefore, it would be helpful if as part of East Cambs Natural Environment SPD that these strategic objectives are clearly set out. This will help to provide the maximum benefit of Biodiversity Net Gain to deliver high quality nature conservation habitats, rather than seeking a swathe of habitat of moderate value that is quick and easy to create (which can score higher using the metric compared to high quality habitats that are complex to create and require long management periods). Consideration should be given to:</p> <ul style="list-style-type: none"> - delivering specific habitats in as specific location / corridor, such as using Habitat Opportunity Mapping or linking with strategic sites such as Wicken Fen or Ouse Washes compensation habitat - identifying habitats that ECDC consider are priorities for restoration, enhancement or expansion - identifying habitats that will support priority / locally important species that ECDC consider are priorities for restoration, enhancement or expansion <p>We also suggest that ECDC considers a mechanism for schemes that cannot deliver 20% BNG to contribute to strategic nature conservation objections, for example through a planning obligation.</p>	the policy will be short lived, because the Environment Act will hopefully establish legal minimum net gain requirements.	
NEV-135	Cambridgeshire County Council NE7	<p>SPD.NE7 is supported and welcome the call for candidate sites for habitat creation. The schemes should include a sufficient period of monitoring and management to achieve target habitat conditions.</p> <p>It is suggested that perhaps smaller schemes are also able to contribute to biodiversity enhancement/ creation scheme, such as fund the management and monitoring of existing wildlife sites (e.g. County Wildlife Sites) or great a funding stream for local community projects.</p>	Comments noted	No change to SPD
NEV-136	Cambridgeshire County Council NE8	<p>SPD.NE:8 is supported but would like to see protection expanded on Traditional Orchards and hedgerows, which are priority habitats. Traditional orchards are particularly susceptible to being grubbed out and therefore, better protection of these sites should be secured.</p>	It is agreed that orchards are an important feature, and are at risk, but this SPD cannot in any way grant them some form of special protection.	No change to SPD
NEV-137	Cambridgeshire County Council NE9	<p>SPD.NE9. is supported. We suggest that planting schemes are designed to be resilient to climate changes.</p>	Comments noted	No change to SPD

NEV-138	F P McCann Ltd.	As an established business and a significant employer, located in Littleport, we have serious concerns with the draft supplementary policy which has recently been circulated for public comment. We are also disappointed that our Company was not directly consulted on the proposed document, particularly as we have recently submitted a planning application on lands which may be affected by the proposed policies. We would highlight that application 20/00232/FUM was received by the Council before public consultation on this document commenced. Our concerns in relation to the draft SPD are as follows:-	All individuals, business and organisations on our consultee database were consulted, and the SPD advertised so that anyone can comment. We can only directly consult those who have given us their consent to be consulted (for GDPR reasons).	
NEV-139	F P McCann Ltd. NE1	<p>This policy should be more specific on the term 'suitable alternatives'. For example does this relate to alternative sites within the administrative boundaries of ECDC only and, if so, should it only consider alternative sites which have been already allocated for the proposed use?</p> <p>The list of acceptable mitigation measures contained within this draft policy is extensive and, in our view, unrealistic. These mitigation measures place a significant emphasis on visitor access to designated site and general recreation. As the SPD seeks to protect the integrity of designated sites, we would question how the provision of new/alternative recreational routes may serve to achieve this aim. The mitigation measures proposed by this policy will require applicants to secure significant additional lands and they will also require consent from numerous third parties in most cases. These measures will be difficult, if not impossible to achieve in many instances, creating considerable difficulties for applicants. It is plausible that these mitigation requirements may ultimately preclude the development of lands which have already been assessed and deemed to be suitable within the Local Plan.</p>	It is not possible to define 'suitable alternatives' as it depends on the nature of the proposal, but it doesn't always follow that it would be confined to district boundaries. We appreciated the challenges set by the policy, but this is for the benefit of protecting land which has been designated at the highest level – internationally important.	No change to SPD
NEV-140	F P McCann Ltd. Table 2	Looking specifically at the Ouse Washes Natura Site, Table 2 identifies pressures and threats from hydrological change as a result of water pollution and flooding. It also refers to effects of flooding on the availability of food for wintering waterfowl. Critically, the table makes no reference to any impact as a result of habitat loss through the development of greenfield sites. On this basis, it would seem that there is no rational link between the identified threats and the imposition of the Swan and Goose IRZ as is proposed by SPD.NE2.	Para 6.29-6.33 addresses these points	No change to SPD

NEV-141	F P McCann Ltd. NE2	<p>Draft policy NE2 provides our primary cause for concern in relation to the SPD, simply because it does not differentiate between allocated and un-allocated lands. We have purchased a significant parcel of land adjacent to our existing operations at Littleport with a view to facilitating expansion in the years ahead. These lands were strategically acquired because they have been identified for industrial/employment uses with the Local Plan. Clearly the value of these lands is also directly linked to allocation LIT 4 of the Local Plan and a significant investment has been made by our Company on the basis of this allocation.</p> <p>Critically, the East Cambridgeshire Local Plan 2015 undertook its own detailed ecological assessment of these lands and deemed them to be suitable for employment uses. Admittedly, the Local Plan was adopted almost 5 years ago but the Natura 2000 sites listed within the SPD were recognised at that time and were given due consideration by the Plan.</p> <p>To address these concerns, we suggest that draft policy NE2 should be re-worded to exclude all greenfield sites which currently benefit from an allocation within the prevailing Local Plan.</p>	<p>This request is not possible. Whilst land is allocated for development in principle, it does not follow that such land will, in all instances, be developable. This is especially the case as evidence evolves and site specific issues become known. It would be unlawful to set (or implement) a blanket exemption from European and National habitat law, on the basis that a site was allocated for development in a Local Plan.</p>	No change to SPD
NEV-142	F P McCann Ltd. NE6	<p>Whilst the main thrust of NE6 is welcomed, a better definition of what would be considered acceptable in terms of biodiversity gain is required. The current wording of this policy is highly subjective, effectively giving the Council and its consultees no set parameters to work within. Whilst the policy lists some measures which may be considered acceptable, more detailed direction should be provided in the form of a list showing the minimum acceptable requirements for each development type.</p> <p>In our view, the proposed policy is too vague on this issue and this will lead to significant problems as applications are assessed. The policy explains that minor gains will not be acceptable and most applicants will already be aware of this. However a sizeable gap exists in the wording of this policy between the term 'minor' and 'significant'. Use of the term 'significantly' provides no ceiling or upper limit to what may be requested by the Council or its consultee on this issue. This will create major uncertainty for applicants and in some cases it will bring the validity of development proposals into question.</p> <p>The correct this, and to remove this uncertainty for applicants, this draft policy should include a concise set of acceptable parameters which are specific to development and scale. Depending on these parameters it may also be necessary</p>	<p>ECDC hopes that the policy will be short lived, because the Environment Act will hopefully establish legal minimum net gain requirements. In the meantime, a flexible policy is intended to help what is already national NPPF policy (which itself does not have clearly defined parameters as requested)</p>	No change to SPD

		to update and amend Local Plan allocations to accommodate these additional biodiversity requirements.		
NEV-143	F P McCann Ltd. NE7	<p>Draft policy NE7 is not closely aligned with Local Plan policy ENV 7 because this proposed policy relates only to development proposals which are of a strategic scale.</p> <p>At a fundamental level, the proposed requirement to set aside 20% of a strategic site's area for habitat creation was not considered in the Local Plan. It follows that the allocations within the current Local Plan have not provided for this requirement. The proposed policy, if implemented, would result in a minimum of 1Ha being removed from non-residential allocations. For residential developments, the impacts are likely to be greater still, significantly reducing the amount of land available for much needed housing.</p> <p>We wholly support the concept of providing additional land for nature but this can only be achieved by accounting for it at a more strategic level, when the Local Plan is updated. The 20% target proposed here cannot be rigidly applied to potential developments sites which are allocated under the current Local Plan. To attempt to apply this policy without first updating the Local Plan would seriously undermine the existing allocations and would prejudice the development management process for applicants of strategic development proposals.</p> <p>We submit that this policy should not be adopted until such times as the Local Plan has been updated to allow for these additional biodiversity requirements.</p> <p>Alternatively, this draft policy should be reworded to ensure that the additional 20% may be provided on lands which are beyond the boundary of the application site and outside the Local Plan allocation boundary.</p>	Agree to a certain degree, though it must be remembered that the Local Plan already includes policy ENV7. Nevertheless, and reflecting the legislative restrictions placed on SPDs, amending the opening sentence to make it clear that the requirements in NE7 are options only.	Amend SPD (see NEV-67)
NEV-144	F P McCann Ltd.	In our view, the draft SPD is not fit for purpose and in some respects it would undermine the current Local Plan as outlined above. I trust that these comments will be given due consideration but should you require any further clarification on these points then please do not hesitate to contact me at this office.	Comments noted	No change to SPD
NEV-145	Cambridge Past, Present & Future Support	<p>Cambridge Past, Present & Future has considered the consultation document and has the following comments to make:</p> <ul style="list-style-type: none"> • As a charity we do not operate across all of the East Cambridgeshire area, our main concern is the area closest to Cambridge. However we are a member of the Local Nature Partnership and support the wider efforts across the county to help restore nature. • We welcome the council's stated commitment to the natural environment and the production of this SPD in order to achieve that. • We are strongly supportive of the overarching vision and the aim of doubling nature. 	Comments noted	No change to SPD

		<ul style="list-style-type: none"> • We strongly support the step-by-step guide which we think is really good. • We strongly support policies SPD.NE1, SPD.NE2 and SPD.NE3. • We strongly support the approach set out in section 7 for nationally important sites. <p>We strongly support the approach set out in section 8 for locally designated sites, including policy SPD.NE4</p> <ul style="list-style-type: none"> • We strongly support the approach set out in section 9 for protected species, including Policy SPD.NE5 • We strongly support the approach set out in section 10 for biodiversity gain and doubling nature, including policies SPD.NE6 and SPD.NE7. <p>We strongly support the approach set out in section 11 for Trees and Woodland, including Policy SPD.NE8.</p> <ul style="list-style-type: none"> • We strongly support the approach set out in section 12 for Landscaping & Biodiversity, including Policy SPD.NE9. • We strongly support the approach set out in section 13 for taking the most appropriate opportunities, including Policy SPD.NE10. • We strongly support the approach set out in section 14 for information to be submitted and toolkits, including Policy SPD.NE11. 		
NEV-146	Natural England Support	Natural England is strongly supportive of the preparation of this comprehensive SPD and its commitment to producing a document with strong ambitions for the natural environment to support the adopted local plan policies. We welcome recognition of the importance of East Cambridgeshire’s valuable wildlife resource and the need to protect and enhance the ecological network to enable wildlife to flourish, particularly in light of climate change. It would be helpful if this could highlight that biodiversity decline, through habitat loss and fragmentation, requires significant enhancement of the ecological network, and the wider green infrastructure network, to repair and re-connect habitats, to buffer more sensitive sites and to make these more resilient to growth and development pressures.	Comments noted, and agree such text would be helpful in section 3.1	Add additional text at start of the box at 3.1, as per for the footnote below ⁴
NEV-147	Natural England Support	We also support the key aims of the SPD to provide guidance on policy requirements to deliver biodiversity net gain and meet Habitats Regulations Assessment (HRA) requirements and to set the Council’s position on the Cambridgeshire Local Nature Partnership (LNP) vision to Double Nature by 2050.	The issues and benefits identified are not disputed, but to keep this SPD	No change to SPD

⁴ Insert into the box at page 12, under para 3.1: “East Cambridgeshire District Council recognises the importance of East Cambridgeshire’s valuable wildlife resource and the need to protect and enhance the ecological network to enable wildlife to flourish, particularly in light of climate change. It is acknowledged that biodiversity decline, through habitat loss and fragmentation, requires significant enhancement of the ecological network, and the wider green infrastructure network, to repair and re-connect habitats, to buffer more sensitive sites and to make these more resilient to growth and development pressures.”

		<p>However, we feel that this should be promoted in the context of the need for a more robust and resilient green infrastructure network. Paragraph 1.3 indicates that the SPD is not intended to address green infrastructure, noting that this may be addressed through a future document. This being the case it is crucial nonetheless that the ecological network is seen as part of the wider green infrastructure network. Creation and maintenance of a high quality and multi-functional strategic green infrastructure (GI) network is essential to the maintenance of a robust and resilient ecological network through:</p> <ul style="list-style-type: none"> • Habitat creation to buffer, enhance and connect habitats including designated sites; • Creation of new and enhanced accessible open space to meet people's recreational needs and to divert pressure away from more sensitive habitats and designated sites. <p>The SPD should reference this and set out the multi-functional benefits that protecting and enhancing the natural environment will deliver, in addition to wildlife enhancement. The SPD should include policy requirements for relevant development to deliver green infrastructure including BNG that will contribute towards the strategic and target areas of the Cambridgeshire Green Infrastructure Strategy (Cambridgeshire Horizons, 2011). Protecting and enhancing the existing green infrastructure network, including designated sites and supporting habitat, will deliver a wide range of environmental services including landscape enhancement, protection of soils including peatlands, climate change mitigation and adaptation including carbon storage, increasing recreational and health and wellbeing opportunities for people, increased flood risk management, water resources and water quality.</p>	<p>manageable, GI was excluded. GI issues are an extensive and complex matter, and are not to be inserted into this SPD. The Council also has a desire that the Cambs wide GI be updated, rather than individual districts 'going it alone',</p>	
NEV-148	Natural England Comments	<p>Key issues for East Cambridgeshire's natural environment include the loss and degradation of peat soils and the need for accessible open space to meet people's recreational needs and reduce pressure on more sensitive designated sites. The SPD should highlight the importance of the district's peat soils as a significant carbon store, in helping to improve air quality and mitigate against climate change. We have provided further advice on this below. Natural England's advice on addressing the effects of recreational pressure on the natural environment is detailed and in Annexes A and B.</p>	<p>We are aware that the Cambridgeshire Climate Commission has a particular focus on exploring the issue in respect of peat, as at present the evidence is not clear. Introducing a policy on peat, in an SPD, without it being regarded as a burden on development is</p>	No change to SPD

			also difficult. That said, the Council is aware of the issues and very much wants to act, where it can, to protect and regenerate peat soils. See also NEV-167 comments	
NEV-149	Natural England	Based on the above our key recommendation is that protection and enhancement of the natural environment should be set out in the context of the wider green infrastructure network and the strategic and target areas of the Cambridgeshire Green Infrastructure Strategy (Cambridgeshire Horizons, 2011). These should be included on a map within section 10 of the SPD. It would be helpful if the SPD could promote the need for a review and update of the Strategy in light of new information emerging through studies such as Cambridgeshire Biodiversity Partnership's Mapping Natural Capital and Opportunities for Habitat Creation in Cambridgeshire (May 2019).	For reasons above, this SPD is not focussing on GI, but the points raised in the representation are noted and something which the Council supports, in principle.	No change to SPD
NEV-150	Natural England	The SPD also provides an excellent opportunity to highlight the application to create a Cambridgeshire Fens Biosphere Reserve which will seek to reconcile the conservation of biodiversity with its sustainable use, for example by promoting development which results in net positive gain for nature. Cambridgeshire ACRE are working under the guidance of a multi-partner Steering Group, to submit an application to UNESCO for the fens to become a Biosphere. With the global status a UNESCO Biosphere would bring to the area and the wide partnership coordination it can enable, the future Fens Biosphere will add considerable value to LPA's key work in tackling climate change (through e.g. promoting best-practice, low-carbon farming and land- and water-management options); economic development (by increasing links between innovative research and local businesses, and helping to coordinate visitor-focused assets and promotion of fenland identity, its produce and products); creating community resilience (by providing Parish Councils and community groups with the tools to become climate resilient, water-wise and greener) and becoming more environmentally sustainable (the Fens Biosphere is identified as a key implementation mechanism for 'Doubling Nature;' as indicated in the Natural Cambridgeshire LNP's vision document, July 2019, adopted by East Cambridgeshire District Council and other LPAs in the area).	It is understood that such a designation would have no impact on planning matters. As such, it is not appropriate to emphasise it within this SPD. The merits or otherwise of the Biosphere are for separate discussion.	No change to SPD
NEV-151	Natural England Para. 2.4	Section 2.4, and subsequent reference to the Conservation of Habitats and Species Regulations, should be amended as follows:	Partially agreed, though the 2012	No change to SPD, other than

		The Conservation of Habitats and Species Regulations 2012 2017 (as amended)	Regulations do exist (albeit mostly superseded)	as per earlier change to update legislation
NEV-152	Natural England Para. 2.8	Section 2.8 – We suggest this section includes a note on the role of Competent Authorities, perhaps along the following lines: <i>“The Council has a legal duty as the ‘competent authority’ under the Habitats Regulations to protect European protected sites from the effects of development (both individually and in combination). The Council is the body that is responsible for undertaking a Habitats Regulations Assessment of its Local Plan and any individual planning applications. It is a legal requirement for the Council to consult Natural England for its views under regulation 64(3) when they are carrying out an appropriate assessment and to ‘have regard’ to any representations that Natural England may make. The Council makes a decision on whether individual planning applications can be lawfully granted”</i>	Agreed	Add a new para, after 2.8., as per suggested wording.
NEV-153	Natural England Para. 3.1 Support	Overarching Natural Environment Vision Natural England supports the Council’s aims through planning, as set out in this section, to protect and enhance the ecological network including priority habitats and helping nature adapt to climate change. We welcome the proposed partnership approach to supporting delivery of strategic ambitions including the LNPs doubling nature vision and the emerging nature related objectives of the Ox Cam Arc project.	Comments noted	No change to SPD
NEV-154	Natural England Para. 3.1 Comments	Our only significant comment is that the vision should take a wider approach to the natural environment and incorporate additional aspirations to protect and enhance green infrastructure, geodiversity, local landscape and Best and Most Versatile land. Protecting and enhancing the remaining peat resource across the district, is particularly important as it provides a significant carbon store, in helping to mitigate against climate change, and the imminent threat to the fenland (including Cambridgeshire’s) peat soils due to current land management practices, identified in Defra’s 25 Year Environment Plan and the UK Peatland Strategy 2018 - 2040. Natural England advises that the policy requirements should promote the sustainable use and management of peat soils, to ensure their protection and minimise production of carbon emissions through their loss and degradation. Policy requirements should ensure that relevant development contributes to the enhancement of degraded fenland peat soils to deliver a wide range of environmental services including biodiversity, open space, flood risk and drainage benefits, in addition to helping to mitigate climate change. Useful reference could be made to the findings of the East Anglian Fens Peat Pilot Study when they emerge.	Comments noted, and the principles agreed, but see response to NEV-148	No change to SPD

NEV-155	Natural England Table 1 Comments	<p>Step by Step Guide Section 4 – Natural England supports the inclusion of the Step by Step Guide to make the process and information requirements clear to developers and applicants. We have the following suggestions:</p> <ul style="list-style-type: none"> • Step 1 – we suggest considering the inclusion of a hyperlink to the Developer Guidance on the GOV.UK website which includes useful guidance and links including to Natural England’s Discretionary Advice Service (DAS); • Step 2 – this should identify that relevant applications will need to be accompanied by an Ecological Impact Assessment (EclA) undertaken by a professional ecologist in accordance CIEEM guidelines1; • Step 3 – biodiversity net gain (BNG) will require surveys to be undertaken and a biodiversity calculator submitted with the application –perhaps this could be flagged in either Step 2 previously or as a specific requirement under Step 3; • With respect to BNG it would also be helpful to explain that planning applications should identify the habitats which are currently present and that the DEFRA Biodiversity Metric should be used to calculate losses and the biodiversity units required to demonstrate BNG. It would also be helpful if there was a hyper link provided to the Defra 2.0 metric; • Step 3 – we suggest that applicant’s should refer to Natural England’s Standing advice for protected species; • Step 6 – could refer to multi-functional Sustainable Drainage Systems (SuDS). 	<p>Step 1 – agreed</p> <p>All other suggestions, whilst noted, are either covered elsewhere or would make the simple step by step guide overly long.</p>	<p>After 2nd bullet in step 1 ,add this link https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals</p>
NEV-156	Natural England Para 5.3 Comments	<p>5.0 What sort of nature conservation measures will decision makers look for? We welcome inclusion of the table under bullet point 5.3 summarising the potential impact of development proposals. We would suggest giving recreational pressure its own bullet point, given the significance of this issue across Cambridgeshire. This could explain that recreational pressure impacts can include bird disturbance, soil compaction, eutrophication from external sources (e.g. dog faeces), damage and changes to the composition of sensitive habitats. We believe air pollution should also be mentioned, particularly transport related pollution impacts where development will lead to significant increases in traffic movements on new or existing roads within 200m of sensitive habitats.</p>	<p>Agreed. See also changes at NEV-77</p>	<p>Amend as per NEV-77 Plus, amend the last bullet to “...traffic (including air pollution) once...”</p>
NEV-157	Natural England	<p>Protecting the Most Valuable Sites: Internationally Designated Sites Natural England supports this section and recognition of the hierarchy of designated sites.</p>	<p>Comments noted</p>	<p>No change to SPD</p>

NEV-158	Natural England NE1 Comments	<p><i>Policy SPD.NE1: Conserving and Enhancing Biodiversity - Internationally Designated Sites</i> – we support this policy but would suggest the following amendments:</p> <p>“The highest level of protection will be afforded to international sites designated for their nature conservation importance. Proposals having an adverse impact on the integrity of such areas, either alone or in combination, that cannot be avoided or adequately mitigated to remove any adverse effect, will not be permitted other than in very exceptional circumstances. These circumstances will only apply where a Habitats Regulations Assessment has been undertaken and it has not been possible to conclude no adverse effect on integrity (either, alone or in-combination) and:</p> <p>(a) there are no suitable alternatives;</p> <p>(b) there are imperative reasons of overriding public interest; and</p> <p>(c) necessary compensatory provision can be secured.</p> <p>Development will only be permitted where the Council is satisfied that any necessary avoidance and / or mitigation measures are included to ensure there are no adverse effects on integrity either alone or in-combination. such that, in combination with other development, there will be no adverse effects on the integrity of international sites.</p> <p>Development proposals that are likely to, or have the potential to, have an adverse effect, either alone or in-combination, on European designated sites must satisfy the requirements of the Habitats Regulations (or any superseding similar UK legislation, post the UK leaving the EU), determining site specific impacts (which could be off-site as well as on-site) and avoiding or mitigating against impacts where identified. Mitigation may involve providing or contributing towards a combination of the following measures:</p> <p>(i) Access and visitor management measures within the designated site;</p> <p>(ii) Improvement of existing greenspace and recreational routes;</p> <p>(iii) Provision of alternative natural greenspace and recreational routes;</p> <p>(iv) Remove monitoring as this cannot be considered as mitigation</p> <p>(v) Other potential mitigation measures to address air pollution impacts e.g. emission reduction measures, on site management measures.</p> <p><u>Where avoidance or mitigation measures are necessary there is likely to be a requirement to undertake monitoring of the effectiveness of such measures</u> <u>Monitoring of the impacts of new development on European designated sites</u> to inform the necessary mitigation requirements and any future refinements of any mitigation measures;</p>	Agreed	Amend NE1 as per suggested text
NEV-159	Natural England Para. 6.13	Para 6.13 – we would suggest minor amendments to wording as follows:	Agreed	Amend as per suggestion

		<p>“Theoretically, any development proposal within East Cambridgeshire could be ‘caught’ by the need to undergo a HRA. However, the purpose of preparing a HRA is to determine firstly whether or not the proposal will have a likely significant adverse effect either alone or in-combination on the Natura 2000 site. If at this screening stage there is a likely significant effect then the appropriate assessments stage must be undertaken to determine if there will be an adverse effect on integrity, either alone or in-combination. Consequently, many small scale development proposals such as (e.g. a house extension within an urban area) would clearly not result in a likely significant adverse effect, and it would be nonsensical to go through the HRA process for such proposals”. It may be helpful to provide a flow chart for the HRA process in an Appendix to the SPD.</p>		(though excluding a flow chart)
NEV-160	Natural England Para.6.18	<p>Para 6.18 – it would be helpful if this paragraph made reference to the recently updated European site Supplementary Advice Packages (SAPs) available via this link (http://publications.naturalengland.org.uk/category/6490068894089216). The SAPs give more detailed information on the sites features and conservation objectives.</p>	Agreed	Add, before the last sentence in 6.18, “The following weblink also provides useful information on each site: [add link from left]”
NEV-161	Natural England Para 6.19 – 6.28	<p>Paras 6.19 - 6.28 – Natural England supports inclusion of the information in these sections including reference and links to the SSSI Impact Risk Zones (IRZs) information. Annex A to this letter provides Natural England guidance on assessing and mitigating recreational pressure impacts to SSSIs whilst Annex B includes a list of Cambridgeshire SSSIs to which the recreational pressure IRZ relates. Perhaps this information could be referenced in the SPD or included in an Appendix.</p>	See NEV-167 comments	See NEV-167 comments
NEV-162	Natural England Para. 6.23	<p>Para 6.23 could include reference to Natural England’s Discretionary Advice Service (DAS) which is available through the hyperlink provided in this section.</p>	Comments noted, but not necessary	No change to SPD
NEV-163	Natural England Para 6.25 - 6.27 Comments	<p>Para 6.25 - 6.27 – we suggest that the IRZs may be better explained along the following lines: The IRZs define areas of potential risk around each SSSI reflecting the sensitivities of the sites notified features and the zone of influence for potential impacts, such as hydrological, air quality and recreational pressure, associated with different types of development. The extent of the zone reflects the existence of a pathway for an impact to occur based on best available evidence. The zone of influence is dependent upon a range of local environmental factors and will vary between environmental effects, for example the zone of influence for air quality impacts associated with increased traffic is likely to smaller than that for recreational</p>	Not agreed. Para 6.20 is the place to explain what IRZs are. 6.26-28 are to illustrate some of the challenges in using them. The replacement text proposed does not do this	No change to SPD

		pressure. Detailed guidance on the use of Natural England's IRZs is available here. (https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf)		
NEV-164	Natural England Para 6.29	Paragraph 6.29 – we would suggest amending this to read 'Ouse Washes Goose & Swan Functional Land IRZ'. The text could be reworded along the following lines: Natural England's Goose & Swan IRZ identifies land which is potentially functionally linked to sites designated for birds, based on survey data including a British Trust for Ornithology (BTO) research project. The term <i>functionally linked land</i> is used to describe an undesignated area lying beyond the boundary of a protected site, which is nevertheless used by the designated bird populations associated with the site. Such areas typically provide habitat for foraging or other ecological functions essential to the maintenance of the designated population. The Ouse Washes 'Goose & Swan' IRZ indicates the extent of potential functionally linked land for Ouse Washes Special Protection Area (SPA) qualifying bird species, particularly Bewick's and whooper swans. Since these areas are considered to be potentially functionally linked to the European site they require appropriate consideration under the Conservation (of Habitats and Species) Regulations 2017 (as amended) (the Habitats Regulations).	Agreed	Replace 6.29 with the suggested text.
NEV-165	Natural England NE2 Support	We generally support the wording of <i>Policy SPD.NE2: Proposals within the Swan and Goose Impact Risk Zone</i> , although we suggest the policy requirements, and those of the Habitats Regulations, apply to any development with the potential to have a significant effect SPA functionally linked land and thereby the Ouse Washes European site.	Comments noted	No change to SPD
NEV-166	Natural England Para. 6.32	Paragraph 6.32 - we would suggest re-wording as follows: Should a development proposal be captured by the above policy <u>planning permission is only likely to be refused where the applicant is unable to demonstrate that any adverse impact to functionally linked land can be adequately mitigated.</u> then it does not mean that development is likely to be refused as a consequence. It is likely that most land will not, following due investigation, be regularly used by qualify species (such as swans). However, as a precautionary measure, it will be necessary for this to be tested and confirmed at the project level HRA stage, <u>to demonstrate no adverse effect on the integrity of the Ouse Washes</u> in line with the above policy <u>and the requirements of the Habitats Regulations</u> .	Agree	Amend 6.32 as per suggested text
NEV-167	Natural England Paras 6.34 – 6.37	Paras 6.34 – 6.37 - we welcome discussion of the effects of housing development on designated sites through recreational pressure. We would suggest the focus of this, and Policy SPD.NE3 should be on SSSIs, indicating those which are also designated as European sites. In addition to Devil's Dyke SAC and Breckland SPA this should also include the Ouse Washes SPA, SAC and Ramsar site and Wicken	On the basis of Natural England's representations, when taken as a whole, including the new	Delete 6.34-6.37, and Policy NE3 and Diagram 1. Replace with

		<p>Fen Ramsar site, a component SSSI of Fenland SAC. This is in light of Natural England's recent review of the Cambridgeshire SSSI recreational pressure IRZ (please see Annex A and Annex B to this letter) and the findings and recommendations of the recent Footprint Ecology Visitor Survey² commissioned by the National Trust which predicts significant increases in recreational pressure to Wicken Fen and the Vision Area associated with development in South and East Cambridgeshire districts. It should be noted that visitors are not actively managed across all parts of these sites.</p>	<p>IRZs issued by Natural England, it is inappropriate for the SPD to attempt to reinterpret such national IRZ policy requirements. As such, sections 6.34-6.37, plus policy SPD.NE3 will be removed from the SPD. In their place, text (not policy) will be included which cross refers to the new IRZs and the likely need for most developments in the district (eg over 10 homes) in most areas of the district, will require an assessment of recreational pressure on relevant SSSI(s) and measures to mitigate adverse impacts e.g. alternative open space provision.</p>	<p>suitable text to cross refer to Natural England's <i>Cambridgeshire SSSI/ Recreational Pressure IRZ</i>.</p>
NEV-168	Natural England Para. 6.36	<p>Paragraph 6.36 indicates that by applying Policy GROWTH 3 requirements most development is not likely to result in a significant increase in recreational pressure on designated sites. The requirements include delivery of green infrastructure improvements identified in the Cambridgeshire Green Infrastructure Strategy and implementation of open space in accordance with Natural England's ANGSt. Natural England agrees that these requirements could go a significant way to mitigating the adverse recreational pressure effects of housing development subject to robust policy requirements for all relevant development. Our advice is that Policy SPD.NE3 should be amended to reflect our advice above and in Annex A to this</p>	See NEV 167	See NEV 167

		<p>letter, to ensure that relevant development will deliver adequate mitigation to address recreational pressure. Our advice is that the level of provision should be proportionate to the scale of development, for example 8ha /1000 population is advocated through the Suitable Alternative Natural Green Space (SANGS) guidance.</p> <p>http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=0ahUKEwix8--Jr8DXAhVIVhoKHQ2JBcsQFggtMAE&url=http%3A%2F%2Fwww.threerivers.gov.uk%2Fdownload%3Fid%3D23189&usq=AOvVaw0whWTqgOBiqNOCGxBNjHK-)</p> <p>Where appropriate, strategic development should be required to contribute towards delivering the Cambridgeshire Green Infrastructure strategic and target areas as far as possible.</p> <p>Please note that Natural England's <i>Cambridgeshire SSSI Recreational Pressure IRZ</i> should replace the 'assumed 8km zone of influence' referenced in Policy SPD.NE3 for Cambridgeshire SSSIs. The exception to this is Wicken Fen; Natural England proposes to set a bespoke recreational pressure IRZ for Wicken Fen based on the findings of the recent Footprint Ecology report, in liaison with the National Trust. We will provide further advice to the Council on this in due course. Chippenham Fen Ramsar, also a component SSSI of Fenland SAC is not currently considered to be at significant risk from recreational pressure, since access to most of the site is via permit only. The policy should reference Natural England's advice with regard to assessing and mitigating recreational pressure impacts, provided in Annex A and Annex B to this letter.</p>		
NEV - 169	Natural England Pages 28 and 29	Section 7 – Natural England welcomes this section on protecting nationally designated sites. However, we would suggest reference is made to the sites in East Cambridgeshire which have been identified as being at risk to the impacts of recreational pressure, listed in Annex B. Policy requirements to protect and enhance SSSIs, including through the effects of recreational pressure, should be included with Policy SPD.NE3 and in line with our advice above.	See NEV 167	See NEV 167
NEV- 170	Natural England Pages 33-38 Support	Reversing the Decline – a 'net gain' in biodiversity Natural England strongly supports inclusion of this section in the SPD.	Comments noted	No change to SPD
NEV- 171	Natural England NE6	<i>Policy SPD.NE6 Biodiversity Net Gain</i> - we welcome this policy and suggest it would be helpful to indicate the % amount of BNG that will be required i.e. will it be the minimum 10% proposed through the Environment Bill, or more than this to help contribute towards the Combined Authority's 'Doubling Nature' target. We note that this is addressed for strategic scale development through Policy SPD.NE7; however, a specific target for all other development is more likely to achieve delivery of anything but negligible BNG. It would also be helpful if the SPD could	An SPD is not permitted, in law, to 'go further' than a Local Plan. Setting a 20% target would do so. ECDC hopes that the policy will be short	No change to SPD

		<p>identify where off-site BNG will be targeted. We note and support the Wildlife Trust's advice on this matter, detailed in their comments on Policy SPD.NE7. In particular, we support their recommendation for the Council, potentially with neighbouring authorities, to prepare a local Nature Recovery Strategy to identify priority opportunity areas for delivery of BNG and contribution to the 'doubling nature' target. This would be based on the Cambridgeshire Biodiversity Partnership's Habitat Opportunity Mapping project, Cambridgeshire GI Strategy strategic area objectives; significant opportunities also exist for habitat creation and enhancement to buffer and connect existing habitats and designated sites within and beyond the boundary of East Cambridgeshire.</p>	<p>lived, because the Environment Act will hopefully establish legal minimum net gain requirements. It is unlikely any authority, even in a Local Plan, will be permitted to exceed targets in the Act. Preparation of a local Nature Recovery Strategy is a matter separate to this SPD.</p>	
NEV-172	Natural England	<p>The SPD could include a draft example of a planning condition relating to off-site net gain – see link here from NE BNG step by step guide Appendix 5 https://www.lichfielddc.gov.uk/downloads/file/1112/supplementary-planning-document-biodiversity-and-development. Policy should make it clear that BNG is not appropriate to address loss of irreplaceable habitats. Our suggested amendments are as follows:</p> <p>"In addition to the provisions set out in the Local Plan, all development proposals should contribute to and enhance the natural and local environment by firstly avoiding impacts where possible, where avoidance isn't possible minimising impacts on biodiversity and providing measurable net gains for biodiversity. If and when a nationally mandated mechanism to secure 'net gains' is introduced, then the following policy will not be implemented.</p> <p>In the absence of any nationally mandated mechanism to secure such 'net gains', the following policy applies:</p> <p>All development proposals (except householder applications – see below) must provide clear and robust evidence setting out:</p> <p>(a) information about the steps taken, or to be taken, to avoid and minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat,</p> <p>(b) the pre-development biodiversity value of the onsite habitat based on an up to date survey and using the Defra metric,</p> <p>(c) the post-development biodiversity value of the onsite habitat using the Defra metric; and</p> <p>(d) the ongoing management strategy for any proposals.</p>	<p>Agree to the amended text, though the Council can not insist at this stage to the use of the Defra metric</p>	<p>Amend the opening paragraphs of NE6, except, in both cases, state 'ideally using the Defra metric'</p>

NEV-173	Natural England NE7	<p><i>Policy SPD.NE7: Contributing to the strategic target of doubling land for nature</i> - we support this policy and would again suggest identification of areas for delivery, as discussed above. We welcome the approach to also ask for consultees to identify sites which may be available. Perhaps this could be extended to a wider formal 'Call for (Biodiversity) Sites' consultation as Greater Cambridge has done to inform preparation of the its revised Local Plan.</p> <p>We suggest consideration be given to combining policies NE6 and NE7.</p> <p>We are aware that the Wildlife Trust has made recommendations for amendments to this policy. Natural England is supportive of these.</p>	Comments noted, though amendments to the policy are needed for reasons raised elsewhere	No (additional) change to the SPD
NEV-174	Natural England NE8	<p><i>Policy SPD.NE8: Trees and Woodland</i> – we fully support this policy but would welcome inclusion of caveat wording regarding tree planting, perhaps within 'New Trees and Woodland' along the following lines:</p> <p>Planting of trees must be considered in the context of wider plans for nature recovery which seeks to increase biodiversity and green infrastructure generally, not simply planting of trees, and protecting / enhancing soils, particularly peat soils. Tree planting should only be carried out in appropriate locations that will not impact on existing ecology or opportunities to create alternative habitats that could deliver better enhancements for people and wildlife, including carbon storage. Where woodland habitat creation is appropriate, consideration should be given to the economic and ecological benefits that can be achieved through natural regeneration. Any tree planting should use native and local provenance tree species suitable for the location.</p>	Agreed.	Add the suggested text as a new second para to the policy, in the sub heading 'new trees and woodland'
NEV-175	Natural England Pages 39-41	<p>We also advise that the policy makes reference to Natural England and Forestry Commission standing advice on ancient woodland, ancient and veteran trees. (https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences)</p>	Agreed, though not in the policy	Add the suggested weblink within the middle of para 11.4
NEV-176	Natural England NE9	<p><i>Policy SPD.NE9: Landscaping and Biodiversity</i> – Natural England fully supports this policy, and the example of multi-functional SUDS, to integrate landscaping and biodiversity into development design to benefit wildlife and people. Our advice is that this policy should also promote the incorporation of sufficient area of high quality multi-functional green infrastructure within residential development, in accordance with Natural England's Accessible Natural Greenspace Guidance (ANGSt) detailed in 'Nature Nearby'. (https://webarchive.nationalarchives.gov.uk/20140605145320/http://publications.naturalengland.org.uk/publication/40004?category=47004)</p> <p>Appropriately designed and managed green infrastructure can provide a wide range of environmental services including biodiversity and landscape enhancements,</p>	The issues and benefits identified are not disputed, but to keep this SPD manageable, GI was excluded. GI issues are an extensive and complex matter, and are not to be inserted into this SPD.	No change to the SPD

		improved health and wellbeing, climate change mitigation through urban cooling, improved flood risk and drainage and opportunities for food production.		
NEV-177	Natural England NE10	<i>Policy SPD.NE10: Taking the most appropriate environmental opportunities</i> – we support the policy requirements for developers to demonstrate that the most appropriate opportunities have been considered for delivering natural environment infrastructure, including opportunities to connect habitat, support protected species and long-term maintenance considerations. We note the requirement for applicants of strategic scale development to consider the opportunity mapping data available on the Council’s website. Our advice is that the requirement should be for applicant’s to demonstrate proportionate contribution towards delivery of any nearby strategic and targets areas of the Cambridgeshire Green Infrastructure Strategy, as far as possible.	Comments noted, but the additional requirement sought is not possible via an SPD	No change to the SPD
NEV-178	Natural England NE11	Information to be submitted and making use of toolkits We support inclusion of this section and <i>Policy SPD.NE11: Provision of sufficient, suitable and robust information</i> . Section 14 / Policy SPD.NE11 should also include a requirement for relevant applications to submit a biodiversity calculator, preferably based on the Defra 2.0 metric or very similar.	Agreed – see earlier comments on this point	No (additional) change to the SPD
NEV-179	Natural England	We welcome recognition of the Council’s duty as a public body to have regard to conserving biodiversity through policy and decision making, under section 40 of the Natural Environment and Rural Communities Act 2006.	Comments noted	No change to SPD
NEV-180	Natural England	Annex A: Natural England guidance for assessing and mitigating the recreational pressure impacts of residential development to SSSIs within Cambridgeshire. The advice below is to highlight key points that Natural England would expect to be considered through the ecological impact assessment process for relevant development triggering the Cambridgeshire SSSI Recreation Pressure IRZs, available to view via www.magic.defra.gov.uk . The relevant SSSIs are listed in Annex B. Please note that this is not intended to provide comprehensive guidance to the Ecological Impact Assessment (EclA) process. Our advice seeks to encourage the application of a robust and proportionate approach to assessing and mitigating recreational pressure impacts in accordance with CIEEM best practice guidelines3. 3 CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester. Relevant planning applications Natural England advises that for the purpose of assessing recreational pressure impacts relevant planning applications could include the following types of	See NEV 167	Add this Annex as an appendix to the SPD, linked to the new text as per NEV 167

		<p>development where they fall within Natural England's Cambridgeshire Recreational Pressure IRZs:</p> <ul style="list-style-type: none"> • New dwellings (excluding replacement dwellings and extensions) • Houses in Multiple Occupancy (HMOs) • Student accommodation • Residential care homes and residential institutions (excludes nursing homes) • Residential caravan sites (excludes holiday caravans and campsites) • Gypsies, travellers and travelling show people plots <p>Screening and assessing potential impacts</p> <p>Natural England is unable to specify development thresholds; however, taking a proportionate approach we believe it should be possible for most proposals below 50 dwellings to be screened out for likely significant effect. If, in the opinion of the LPA, a smaller proposal closer to a SSSI(s) is considered likely to have significant effect, impacts should be assessed.</p> <p>Adequate justification should be provided to inform any decision to screen out potential recreational pressure impacts. Factors such as lack of formal car parking facilities or the availability of existing open space should be supported by appropriate evidence.</p> <p>The detailed assessment should take a proportionate but robust approach in accordance with CIEEM EclA guidelines. This will be particularly influenced by the scale and nature of the proposed development and opportunities to avoid recreational pressure impacts. Assessment of recreational pressure impacts should preferably be based on recent visitor survey data, to establish the baseline and to enable prediction of the likely increase in visitor levels associated with the development. The need for visitor surveys to inform the assessment will be dependent on a range of factors including the scale of development and the availability and reliability of any existing data. Natural England's advice is that a visitor survey should be undertaken for larger residential developments, particularly where significant cumulative impacts are likely, unless alternative evidence is available to adequately inform the assessment.</p> <p>Specific regard should be given to the SSSI special interest features and conservation objectives which can be found here. Natural England strongly recommends that the assessment is informed by advice from site managers regarding current visitor pressures to the SSSI(s) and the availability of habitat management and access control measures to manage existing and future levels of pressure.</p>		
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		<p>For SSSIs also designated as European sites the assessment will need to consider the sensitivity of the site qualifying features to the effects of recreational pressure. Reference should be made to the sites' Conservation Objectives and advice obtained through discussion with site managers.</p> <p>Avoidance and mitigation measures</p> <p>In accordance with the ecological mitigation hierarchy priority should be given, wherever possible, to implementing avoidance measures to address adverse impacts. Mitigation to address adverse recreational pressure impacts generally requires a package of avoidance and mitigation measures comprising delivery / contribution towards delivery of alternative greenspace to maximise avoidance of impacts by diverting new visitors away from the sensitive SSSI, together with SSSI access management measures, where required / available. However, appropriate mitigation measures should be determined by the findings of the assessment. Many accessible SSSIs across Cambridgeshire and Peterborough are already at recreational carrying capacity with limited potential for additional access management measures to deal with any increase in visitors. However, any opportunities for this should be discussed with site managers. With this in mind provision of sufficient quantity and quality of alternative accessible natural greenspace within or close to the development boundary is likely to be key to alleviating recreational pressure on SSSIs. Such provision can help minimise any predicted increase in visitors to designated sites by containing the majority of recreational activity within and around the development site boundary away from more sensitive sites, thus avoiding adverse impact.</p> <p>We advise that reference should be made to Natural England's Suitable Alternative Natural Green Space (SANGS) guidance which requires a quantum of SANGS at a rate of 8ha per 1000 population. Whilst this guidance is specific to the SANGS creation for the Thames Basin Heaths Special Protection Area (SPA) the broad principles are more widely applicable. We recommend that the design and layout of accessible green space should seek to accord with Natural England's Accessible Natural Greenspace Standards (ANGSt) as far as possible. As a minimum, we advise that alternative accessible greenspace should include:</p> <ul style="list-style-type: none"> • High-quality, informal, semi-natural areas in accordance with SANG and ANGSt where possible; • Circular dog walking routes within the site and/or with links to surrounding public rights of way (PRoW) – the average requirement is ~ 2.7 km; • Dedicated 'dogs-off-lead' areas and dog waste bins; • On-site signage and/or information leaflets to promote these areas for recreation; 		
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		<ul style="list-style-type: none"> • A commitment to the long term maintenance and management of these provisions. <p>Green infrastructure / SANGS should be designed to absorb significant proportions of the day to day recreational needs of new residents, such as walking, dog-walking, jogging / exercise, children’s play facilities, and other informal recreation including enjoyment of the countryside. It should also aim to provide a semi-natural character, with significant proportion of semi-natural grassland, woodland, scrub and wetland habitat. Dependent upon a range of factors, including the scale of development, consideration could be given to the provision of other amenities such as café / refreshment and toilet facilities.</p> <p>The following additional or possible alternative measures to mitigate recreational pressure impacts may also be appropriate:</p> <ul style="list-style-type: none"> • SSSI Site Access and Management Measures (SAMMs); • Improvement of existing green space and recreational routes; • Monitoring the impacts of new development on designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures. <p>Developers wishing to seek substantive advice on recreational pressure impacts and mitigation relating to SSSIs should be directed to Natural England’s Discretionary Advice Service (DAS). It may also be prudent to seek the advice of the Wildlife Trust in relation to SSSIs managed as CWSs.</p>		
NEV-181	Natural England	<p>Annex B: Cambridgeshire Recreational Pressure IRZ Component SSSIs</p> <p>Natural England’s Cambridgeshire SSSI Recreational Pressure IRZ identifies a recreational pressure ‘zone of potential risk’ of 5km (Higher) or 2km (Lower), for those sites known to be at risk. This is a best estimate of the distances people are travelling to access these sites regularly based on currently available information and anecdotal records, together with</p>	See NEV 167	Add this Annex as an appendix to the SPD, linked to the new text as per NEV 167 (insert original representation)

	evidence 'in the field' of damage or disturbance to site notified features.			
	Barnack Hills and Holes SAC	H		Peterborough
	Berry Fen	L		Huntingdonshire
	Brackland Rough	L		East Cambridgeshire
	Brampton Wood	H		Huntingdonshire
	Cam Washes	H		East Cambs, South Cambs
	Castor Flood Meadows	L		Huntingdonshire
	Castor Hanglands	L		Peterborough
	Cherry Hinton Pit	L		Cambridge City
	Dogsthorpe Star Pit	L		Peterborough
	Devil's Dyke (parts also designated as SAC)	H		East Cambridgeshire South Cambridgeshire
	Fleam Dyke			South Cambridgeshire
	Roman Road			
	Ely Pits and Meadows	L		East Cambridgeshire
	Eversden and Wimpole Woods SAC	H		South Cambridgeshire
	Fowlmere Watercress Beds	H		South Cambridgeshire
	Fulbourn Fen	L		South Cambridgeshire
	Grafham Water	L		Huntingdonshire
	Great Wilbraham Common	L		South Cambridgeshire
	Gamlingay Wood	H		South Cambridgeshire
	Hardwick Wood			South Cambridgeshire
	Hayley Wood			South Cambridgeshire
	Buff Wood			South Cambridgeshire
	Waresley Wood			Huntingdonshire
	Overhall Grove			South Cambridgeshire
	Papworth Wood			South Cambridgeshire
	Houghton Meadows	L		Huntingdonshire
	Hemingford Grey Meadow	L		Huntingdonshire
	Orwell Clunch Pit	L		South Cambridgeshire
	Ouse Washes SAC, SPA and Ramsar	L		East Cambridgeshire
	Portholme SAC	H		Huntingdonshire

		Nene Washes SAC, SPA L and Ramsar Southorpe Meadow H Southorpe Paddock L Shepreth L-Moor L Thriplow Meadows L Upwood Meadows H Wansford Pasture H Warboys and Wistow L Woods Woodwalton Marsh L	Fenland, Peterborough Peterborough Peterborough South Cambridgeshire South Cambridgeshire Huntingdonshire Peterborough Huntingdonshire Huntingdonshire		
NEV-182	Pigeon Investment Managements Comments	Pigeon welcome the overall intention of the document and fully appreciate the need for all to take appropriate action in response to the climate emergency. Nonetheless, it is also important that the document can be practically applied without undue adverse implications for the Council's requirements in respect of housing delivery for instance and to ensure that Local Plan allocations and appropriate windfall development can come forward in a viable and deliverable manner whilst securing ecological/biodiversity enhancements. Given Pigeon's involvement in helping to deliver sustainable, planned development within the District we are keen to work with the Council to ensure an appropriate balance is secured and our comments should be taken in that context.		Comments noted	No change to SPD
NEV-183	Pigeon Investment Managements	In response to the document Pigeon has commissioned both Hopkins Ecology and Haydens Aboricultural Consultants to review and assess particular aspects of the draft DPD relevant to their area of expertise. Their individual responses are appended to this letter and are intended to supplement and be read alongside this response to assist with the Council's consideration of these particular matters further.		Comments noted	No change to SPD
NEV-184	Pigeon Investment Managements Paragraph 1.9	The text should also acknowledge the need for the SPD to be reviewed regularly in order to take account of, for example, new Government initiatives and legislative changes being brought forward, for instance through the Environment Bill.		Comments noted, but not necessary	No change to SPD
NEV-185	Pigeon Investment Managements Paragraph 2.5	The reference to the Hedgerow Regulations protecting most countryside hedgerows is not accurate – only those which meet particular criteria are deemed 'important' and covered by the Legislation. The wording should therefore be amended accordingly.		Comments noted, but not necessary	No change to SPD
NEV-186	Pigeon Investment Managements Table 1 (Step 2)	Pigeon would suggest that clarification is provided as to what constitutes 'strategic scale development' to avoid confusion and that this threshold should be clearly justified. Policy SPD.NE3 later suggests that this would relate to developments of 100 dwellings or more. This threshold seems arbitrary and is not clearly explained		Agree	Add '(as a guide, this could be 150 dwellings or

		or justified. It is suggested that the Council instead uses a threshold of 150 dwellings or more which would accord with the relevant threshold used for Screening purposes (Schedule 2 10(b)) within the EIA Regulations.		more)' in the third column of step 2, after 'proposals'.
NEV-187	Pigeon Investment Managements Paragraph 6.3/6.4	Pigeon welcome the clarification with regard to the potential need to update the SPD to reflect changes in legislation as a result of the UK leaving the EU and the need to transpose EU legislation into UK law. Indeed the legislative context is likely to evolve significantly in the next few years as a result of this and the Environment Bill currently going through Parliament. Given the significance of this to the context in which this SPD is being drafted it is considered that this issue and its implications for the SPD should be set out clearly at the beginning of the document rather than through brief references half way through. This may affect the weight to be attached to particular policies in the SPD as matters progress. In any event, the SPD will clearly need to be updated to reflect the Environment Bill and the Council may therefore choose to consider whether to await its approval before finalising and adopting the SPD.	Comments noted, but not necessary	No change to SPD
NEV-188	Pigeon Investment Managements NE1	Policy SPD.NE1 (Conserving and Enhancing Biodiversity) – Please refer to attached response from Hopkins Ecology Ltd.	The Hopkins Ecology Ltd document, as submitted by the representor, has been reviewed. Many of the comments made are similar to those made by others. Having reviewed the document, no further significant change is considered necessary to the SPD.	No (further) change to SPD
NEV-189	Pigeon Investment Managements NE2	Policy SPD.NE2 (Proposals within the Swann and Goose Impact Risk Zones) - Please refer to attached response from Hopkins Ecology Ltd.	The Hopkins Ecology Ltd document, as submitted by the representor, has been reviewed. Many of the comments made are similar to those made by others. Having reviewed the document, no further	No (further) change to SPD

			significant change is considered necessary to the SPD.	
NEV-190	Pigeon Investment Managements Paragraph 6.35	The potential number of people that new housing developments may deliver will depend on the housing mix (and therefore household size) as well as the number of new homes provided. In any event, however, it should also be acknowledged that not all new residents will be new to the area but may be moving within the IRZ areas.	Comments noted	No change to SPD
NEV-191	Pigeon Investment Managements Paragraph 6.37	The paragraph refers to a number of discussions with Natural England in 2018 regarding recreational pressures on particular sites and notes that whilst not listed in the Site Improvement Plan for Devil's Dyke, recreational pressure is regarded by Natural England as an issue for the site. It is considered that greater clarity and transparency should be provided in respect of these discussions. It is assumed that these discussions may have taken place in the context of the now withdrawn Local Plan Review and that documents may have been provided as part of the Examination Library Documents to this effect. If this is the case, these should be referenced or further clarity and evidence provided in respect of these discussions given that this is not consistent with the latest public information for the site. Please also refer to the more detailed response in relation to this within the attached comments from Hopkins Ecology.	See NEV 167	See NEV 167
NEV-192	Pigeon Investment Managements NE3	Policy SPD.NE3 (Recreational Pressure on Designated Sites) – The draft policy refers to 'an assumed 8km zone of influence of the Devil's Dyke and Breckland designated sites and that within this zone it may be necessary to provide open space, outdoor sport and recreation facilities in excess of the Council's usual requirements. However, it is unclear from reading the document how the 8km zone of influence has been defined and why this particular threshold has been chosen. It is assumed that this has been developed with reference to the Natural England Impact Risk Zones, however, this is not clear. In any event, paragraph's 6.24-6.26 underline the difficulties of identifying and applying these IRZs. In this context, it is considered that it is important that clear explanation and justification is provided as to why this particular threshold has been chosen. In addition, it is important that there is a clear link between the potential impacts and any mitigation in terms of what the Policy requires. Given that these designations are clearly not going to be used for formal outdoor sport but for informal recreation, it would not be appropriate to seek additional outdoor sports provision as part of any proposed housing schemes within the IRZs. Notwithstanding the comments above, we nonetheless welcome the flexibility in the application of the policy to allow for both on and off-site mitigation solutions (including use of financial contributions) to be agreed. This will both enable delivery	See NEV 167	See NEV 167

		<p>on more constrained sites and also support the delivery and implementation of the Cambridgeshire Green Infrastructure Strategy.</p> <p>Finally, for the sake of clarity, the second bullet point in relation to development within Reach, Swaffham Prior, Stetchworth and Burwell should refer to 'major residential development'.</p> <p>Please also refer to the detailed response in relation to this matter within the attached comments from Hopkins Ecology.</p>		
NEV-193	Pigeon Investment Managements Paragraph 7.9	<p>This suggests that where a SSSI is vulnerable to recreational pressure, 'the sentiments of policy SPD.NE3' may need to be applied to development proposals. It is considered that the wording is ambiguous such that it could not be fairly and consistently applied. Firstly, it is considered that it would be helpful if clarification as to whether or not (at the time the SPD is approved) this applies to any of the individual sites listed at paragraph 7.2 (other than those forming part of the international designations). Secondly, it is considered that greater clarity is required as to how such a requirement would be determined to apply with reference to Local Plan Policy ENV7 and the specific aspects of Draft Policy SPD.NE3 that would apply.</p>	See NEV 167	<p>See NEV 167</p> <p>Delete para 7.9</p>
NEV-194	Pigeon Investment Managements Paragraphs 8.9-8.10	<p>The paragraphs should provide further clarity in respect of identifying PRV sites given that these are not referred to on the Local Plan Policies Maps. It is understood that the East Cambridgeshire County Wildlife Sites SPD identifies the Protected Roadside Verges (RSV's in 2010 SPD) but this should be confirmed to enable the clear and transparent application of Policy SPD.NE4.</p>	The understanding is correct	No changes to SPD
NEV-195	Pigeon Investment Managements NE4	<p>Policy SPD.NE4 (Development resulting in loss or deterioration of CWS, LNR and PRVs) – The second paragraph should specifically refer to Local Plan Policy EN7 for the sake of clarity.</p>	Agreed	Amend NE4 to '...Local Plan policy ENV7 will...'
NEV-196	Pigeon Investment Managements Paragraph 10.13	<p>Pigeon welcome clarification that Policy SPD.NE6 is likely to be subject to change given the current uncertainty in respect of the progression of the Environment Bill and any subsequent Environment Act.</p>	Comments noted	No change to SPD
NEV-197	Pigeon Investment Managements NE6	<p>Policy SPD.NE6 (Biodiversity Net Gain) – The Policy states that proposals that do not significantly exceed the pre-development biodiversity value of a site will be refused. Whilst some explanation of how 'significantly' would be defined is provided, it is considered that further clarification and guidance is required in order to help applicants determine what might be judged to qualify as 'significant' rather than 'very minor' net gains. This should have reference to the biodiversity unit scoring within the biodiversity metrics referred to in the SPD. This would help</p>	Comments noted, but it is beyond the scope of an SPD to be so specific (i.e. define and require it). The expectation for on-site provision is sound.	No change to SPD

		<p>ensure that the Policy was more consistent with paragraph 025 (Ref ID 8-025-20190721) of the PPG.</p> <p>In addition, Pigeon is concerned that the draft Policy suggests the Council would only allow off-site provision in exceptional circumstances. On a practical level (as the Council acknowledge elsewhere) no two sites are the same. Some, particularly in a more constrained urban context, will have less space and opportunity to deliver 'significant' measurable net gains. Moreover, there are many local plan allocations which have been identified several years ago before this requirement came into affect and which may have less scope to meet these requirements. There is a risk that such an inflexible approach to the application of this policy would unduly inhibit the Council's ability to meet its housing delivery and employment targets or other requirements.</p> <p>Moreover, in any event, this unduly inflexible approach is not consistent with paragraph 023 (Ref ID 8-023-20190721) of the PPG which makes it clear that biodiversity benefits can be secured on-site or by using off-site gains where necessary. It does not suggest that this should only be in exceptional circumstances.</p> <p>We therefore consider that the wording of this part of the Policy should be amended to introduce greater flexibility in accordance with the PPG. This could assist both housing delivery and the implementation of wider biodiversity strategies.</p> <p>Please also refer to the response from Hopkins Ecology Ltd.</p>		
NEV-198	Pigeon Investment Managements NE7	<p>Policy SPD.NE7 (Doubling Land for Nature) – It is noted that the Policy is intended to apply to 'Strategic scale development proposals' which the Policy defines as developments of 100 dwellings or more, or 5ha or more for non-dwelling proposals. As noted above, Pigeon consider that the threshold for residential development appears arbitrary and we would suggest that the Council instead uses a threshold of 150 dwellings or more which would accord with the threshold used for Screening purposes in respect of residential proposals (Schedule 2 10(b)) within the EIA Regulations.</p> <p>The Policy goes on to require that for such proposals a minimum of 20% of the application site area should be designated as land for rich wildlife habitat or that an equivalent amount of land is created off-site and secured through a legal agreement. Firstly, to aid interpretation of the Policy it is considered important that 'rich wildlife habitat' is clearly defined.</p> <p>Whilst Pigeon are supportive of the overall objectives behind the Policy in seeking to contribute to the strategic target of increasing land for nature, it is important to stress that the requirement for at least 20% of the site area to be given to such uses is significant, particularly when seen in the context of other site-specific requirements such as sports and other infrastructure provision and indeed</p>	See NEV 67 and NEV 68	See NEV 67 and NEV 68

		<p>biodiversity net gain. Moreover, as noted within the draft SPD, no two sites are the same and some are more constrained than others – some may have scope to deliver more than this whilst others may struggle to meet this requirement. A blanket 20% requirement does not reflect this reality and there is a danger therefore that the cumulative effect of applying such a requirement in addition to others would be to adversely effect the ability of some sites to deliver the number of homes otherwise envisaged. The inflexible application of this requirement could therefore undermine the Council’s housing delivery which is already below Government requirements.</p> <p>Moreover, the SPD provides no evidence to justify this particular requirement and why this level has been set. It is also important that the policies within the SPD are complimentary and mutually supportive to one another but it is not clear whether this blanket requirement would support or undermine the biodiversity net gain requirement which is based on a more nuanced, flexible and proportionate approach.</p> <p>Although the Policy does alternatively allow for the provision to be made off-site and secured via a legal agreement there is currently uncertainty as to how realistic this might be as an alternative given that such sites should be located within East Cambridgeshire and that there is currently no available list of candidate off-site sites. The best means to identify such sites and develop a comprehensive strategy for this would be through a review of the Local Plan which the Council is not currently pursuing.</p> <p>Pigeon are therefore concerned with the practical implications of the policy and consider that changes are necessary to ensure that the District can contribute to the Doubling Land for Nature targets without adversely affecting the deliverability of individual allocated sites within the Local Plan and the achievement of other objectives.</p>		
NEV-199	Pigeon Investment Managements Paragraph 11.5	There should not be an expectation to retain category U trees. It would be helpful if this was confirmed.	Comments noted, but not necessary	No change to SPD
NEV-200	Pigeon Investment Managements NE8	Policy SPD.NE8 (Trees and Woodlands) – The Policy sets out mitigation requirements in terms of replacement tree planting where the loss of Category A and B trees is proposed. Whilst Pigeon support the principle of mitigating any tree loss for such categories of trees it is not clear whether the ratio of replacement trees required has any particular basis. Moreover, we would stress that it is not merely about the number of trees but is also important that any replacement trees are of a reasonable quality and sufficiently spaced to enable them to thrive. Please	Comments noted, (including the attached response from Haydens Aboricultural) but no change deemed necessary, other than updating the	Amend para 2.5 to accurate summarise the Hedgerow Regulations

		refer to attached response from Haydens Aboricultural Consultants Ltd for further details.	Hedgerow Regulations commentary. Policy found sound as part of Peterborough Local Plan process	
NEV-201	Pigeon Investment Managements NE9	Policy SPD.NE9 (Landscape and Biodiversity) – Pigeon support the approach outlined and consider that carefully integrating landscape and biodiversity within the design of new developments is the best means of achieving many of the objectives of this SPD. As part of any such strategy, it is important that the Council recognises that open spaces can serve multi-faceted purposes and should be fully integrated with SUDs regimes.	Comments noted	No change to SPD
NEV-202	Pigeon Investment Managements NE10	Policy SPD.NE10 (Taking the most appropriate opportunities) – Pigeon are generally supportive of this policy, however, in the absence of the opportunity mapping data referred to it is difficult to fully appreciate the implications of the Policy for strategic scale sites in particular. It is important that this information is made publically available shortly and that this is itself available for comment. Again, we would reiterate the comments above with respect to how strategic scale developments are applied.	Comments noted	No change to SPD
NEV-203	Pigeon Investment Managements NE11	SPD.NE11 (Provision of sufficient, suitable and robust information) – Pigeon welcome confirmation that where further information is required Applicants will be given the opportunity to provide this within a reasonable timeframe. This is in the interests of positive planning and reflects the practical restrictions for ecological surveys which result from seasonal survey periods.	See NEV 71	See NEV 71
NEV-204	Pigeon Investment Managements Comments	Pigeon welcome the Council's intentions in seeking to provide additional guidance in respect of the natural environment and support the overall objective of increasing biodiversity in response to the Climate Emergency. Whilst we are supportive of much of the content of the draft DPD there a number of aspects where we consider that some amendments or clarifications should be made. In particular, it is considered that with regard to Policy SPD.NE3 the evidence base to assert that there is a recreational impact pressure on the Devil's Dyke Special area of Conservation (SAC) has not been provided and the policy is not therefore justified. With regard to Policy SPD.NE6 it is considered that the wording of the policy should be amended to allow off-site provision to achieve biodiversity net gain where necessary in accordance with the PPG. Finally, in respect of Policy SPD.NE7, it is considered that this policy is poorly defined, has the potential to introduce immense uncertainty, and potentially jeopardise the deliverability of individual schemes and wider growth. Substantial revision of this policy is recommended.	Comments noted, and discussed above	No change to SPD

NEV-206	Pigeon Investment Managements Comments	Pigeon welcome this consultation and hope that the Council will find the comments of assistance. It is suggested that the Council may wish to consider the benefits of a workshop with Developers before the SPDs are finalised as a mechanism for ensuring the documents draw an appropriate balance in seeking to secure sustainable development which both protects the natural environment and maintains requisite housing delivery including self and custom build housing. I trust that you will find our comments, which have been provided in the interests of facilitating the delivery of sustainable development, of assistance in moving forward towards adoption of these important SPDs. Pigeon are more than happy to give any assistance in clarifying or expanding on any comments made in the above text and attached documents and would be happy to meet with the Council if this was of assistance.	Comments noted	No change to SPD
NEV-207	Royal Society for the Protection of Birds	Please find below some comments from the Royal Society for the Protection of Birds on the draft East Cambridgeshire District Natural Environment SPD. The RSPB welcomes the production of this document and we feel it contains key policies that will aid achievement of the 'doubling nature' target adopted by E.Cambs District Council, as well as ensuring the protection of the many internationally, nationally and locally important sites for nature within the district. Although we do not have specific sites to contribute to a list of off-site net gain habitat creation opportunities at the moment, we would welcome the opportunity to work with the Council and neighbouring authorities, to identify areas of search for strategic habitat creation priorities (for example to complement the compensation habitats being created adjacent to the Ouse Washes), perhaps as part of a 'nature recovery' or 'green infrastructure' plan covering Cambridgeshire.	Comments noted Preparation of a local Nature Recovery Strategy is a matter separate to this SPD.	No change to SPD
NEV-208	Table 1 - RSPB	Step 1 – although it is sensible for developers to contact Natural England pre-application when proposals may impact national or international sites, Appropriate Assessment will only be required for the latter – suggest re-word to make this distinction.	Comments noted, but not deemed necessary	No change to SPD
NEV-209	NE1 - RSPB	Policy SPD:NE1 – the list of mitigation measures listed is quite limited. Mitigation will be specific to the type and location of a development proposal and the potential impacts it might have on a site. The list majors on recreational disturbance, but there are many other impact types (eg: water management, water pollution, noise disturbance etc..). We would suggest removing this list unless you want to make it much more comprehensive, as otherwise it might be taken on face value. RE: monitoring – although monitoring the efficacy of mitigation measures is important, so that adaptive management measures can be adopted if necessary, it is vital to make clear in point (iv) that monitoring of impacts is not in itself mitigation. Also, potential impacts and their mitigation need to be defined and fully addressed at the Appropriate Assessment stage so as to give certainty that no adverse effects will	Comments noted but Policy wording has been agreed with NE	No (further) change to the SPD

		occur. Case law clearly states that if uncertainty exists as to the extent of impacts and whether these can be addressed successfully by mitigation, then consent should be refused – there is no ‘suck it and see’ approach.		
NEV-210	Para.6.13 - RSPB	6.13 – although there clearly are proposals that will be ‘de minimus’, it is worth noting that consideration of cumulative/in-combination impacts is required within Appropriate Assessment, and these may well come from numerous small scale developments that in and of themselves would not have an adverse effect on a site (eg: multiple small scale housing leading to cumulative recreational disturbance around Thames Basin Heaths SPA, which has been addressed by the LPAs responsible for the site through their suitable alternative natural greenspace (SANGS) approach). Although this possibility is alluded to in subsequent paragraphs and policies, it would be worth making this clear in this paragraph.	Comments noted but revised wording has been agreed with NE	No (further) change to the SPD
NEV-211	NE21 - RSPB	Policy SPD:NE2 – the RSPB supports this policy to ensure that developments that affect functionally linked land to Ouse Washes SPA are subject to Appropriate Assessment. However, in addition, the RSPB believes that a distinction needs to be made for those areas (around Coveney, and any further areas that come on-stream) that are part of the Environment Agency’s project to provide compensatory breeding habitat for waders due to the deterioration in the conservation status of the Ouse Washes SPA due to spring flooding. As compensation areas, these will need to be designated as SPA by the UK government, and as such should be counted as ‘potential SPA’ (pSPA) for the purposes of Habitat Regulations assessments. We believe this should be reflected either in this policy or in Policy NE1 (or its reasoned justification)	Comments noted but to do so now seem premature.	No change to the SPD
NEV-212	Para. 6.37 – RSPB	The explanation here states that all four sites have been ‘listed as vulnerable’ to recreational pressure, but then goes on to say that besides Breckland and Devil’s Dyke ‘all other designated sites do not list public access and recreational pressure as a vulnerability’. It would be worth making clear here that although only Breckland and Devil’s Dyke have been specifically identified by NE for further policy action, other international sites (for example Ouse Washes) could well be affected by recreational disturbance depending on the extent and location of housing development, and that this policy does not therefore exclude consideration of this impact in Appropriate Assessments for other sites when it is warranted.	See NEV 167	See NEV 167
NEV-213	NE7 – RSPB	Policy SPD:NE7 – although we understand the desire to see off-site net gain habitat provided as close to the development proposal as possible and within East Cambs District, we would encourage the council to keep open the option of developers contributing to strategic habitat creation opportunities that may not be within the boundaries of E.Cambs. These strategic opportunities should be identified in a Nature Recovery Strategy/Green Infrastructure Plan which ideally is developed with neighbouring planning authorities. Following this approach there	Comments noted, but not deemed necessary to amend the SPD to reflect them. Preparation of a local Nature Recovery	No change to SPD

		may well be net gain strategic habitat creation opportunities within E.Cambs that developments in neighbouring authorities can contribute to.	Strategy is a matter separate to this SPD.	
NEV-214	NE11 – RSPB	Policy SPD:NE11 – Another approach might be for the Council to not register planning applications that do not include sufficient information to allow them to assess the environmental impact of the proposal, rather necessarily than processing and refusing them.	There is always a difficult balance to be had in where a planning application has sufficient information to be at least validated and considered, and where it fails even that threshold.	No change to SPD
NEV-215	Swaffham Prior Community Land Trust	<p>We are writing in respect of your Natural Environment SPD Consultation and writing on behalf of Swaffham Prior Community Land Trust working in conjunction with Cambridgeshire County Council. There are three areas on the SPD consultation on which you request commentary:</p> <ol style="list-style-type: none"> 1. Whether it is easy to understand or how it can be improved. 2. Whether you think it should include any topic or further advice that currently is not included in the document. 3. Whether you disagree with what this document is proposing. <p>We do not propose to comment on points 1 or 2 however we wish to raise an issue under point 3.</p>	Comments noted	No change to SPD
NEV-216	Swaffham Prior Community Land Trust	<p>Our community is working hard to take the whole village off oil, reducing our collective carbon footprint by 60%. The project is the first district retrofit in the country and is being closely monitored by central government and the Welsh Assembly.</p> <p>As the application is on County Council land we have to complete a Regulation 5 planning application to the County not to East Cambs. Our EIA screening has been submitted to the County Council and we await a response (disrupted due to Covid-19). We note under Step 2 on page 13 of the consultation ‘the County Council checklist should suffice’ for development proposals and as a key strategic partner we are working closely together.</p> <p>The reason for the response is that our energy centre will be housed south of the Devils Dyke in an existing barn on Heath Road Swaffham Prior and will comprise an industrial air source heat pump, 4 water storage tanks (like grain stores), approximately 18 acres for 165 close loop ground source heat pipes and network</p>	Comments noted	No change to SPD

		<p>(mostly 800mm below the ground) and a solar array. This achieves an 100% fossil fuel free system which will lead the UK in become net carbon zero.</p> <p>As part of the project, a new grainstore for the farmer will be reinstated adjacent to the farmhouse to the north of the Devils Dyke.</p> <p>Further information can be found here https://heatingswaffhamprior.co.uk/ and our latest newsletter https://heatingswaffhamprior.co.uk/wp-content/uploads/2020/03/March-Newsletter_online.pdf</p>		
NEV-217	Swaffham Prior Community Land Trust	<p>Devil's Dyke SAC - Designation and Code: Special Area of Conservation (SAC) – UK0030037</p> <p>Location: The site is located within East Cambridgeshire district and also extends into Forest Heath district in Suffolk</p> <p>Area: 8.02 ha</p> <p>The key aim for East Cambs is to ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The extent and distribution of qualifying natural habitats; <input type="checkbox"/> The structure and function (including typical species) of qualifying natural habitats; and <input type="checkbox"/> The supporting processes on which qualifying natural habitats rely. <p>We do not think in the majority that our proposals conflict with the Devil's Dyke. There is no significant adverse effect on the Dyke which is Natura 2000 site. As a village community we value highly the Dyke and the environment around the village. However looking at the list of potential impacts 5.3 we believe there could be minor disturbance through construction however this is on land adjacent not within the SAC. We are aware a method of construction report may need to be submitted to the County Council. There will be no major long-term viability of land management on the SAC. There will be no effects of traffic on the SAC once the development is complete and operational.</p> <p>The Dyke is a species rich calcareous grassland is vulnerable to vegetation succession by rank grasses and requires active management by grazing. Our proposal will not lead to any increased recreational pressure or trampling of vegetation and soil enrichment from dog excrement, antisocial behaviour such as littering, fires and other activities that will be damaging vegetation. There is no increased risk from atmospheric nitrogen deposition and our project will</p>	Comments noted	No change to SPD

		significantly decrease atmospheric nitrogen. We are installing air quality monitors in the village to monitor the before and after situation.		
NEV-218	Swaffham Prior Community Land Trust	We wanted to raise the project now to ensure that the SPD does not impose any further restriction on land adjacent to the SAC to make sure our community and environmentally changing project can continue unhindered. Indeed this project is fully aligned with the declared climate and environmental emergency declared by both County and East Cambs, and is a leading case study in the Climate Change and Environment Strategy' that was out for consultation earlier this year (see 2.21). No physical harm will come to the Devil's Dyke SAC and we too have strategic ambitions to use this project to help many more communities (10,000 homes alone in Cambridgeshire run on oil) and as in 3.1 this project responds to, and helps[us as a village] adapt to a changing climate.	Comments noted	No change to SPD
NEV-219	John Armour Comments	One point that may or may not be in the Council conditions is the working practice on site where pollutants may be deposited and indeed remain on site following construction. This sort of situation may be difficult to detect and or observe at the time.. One possible solution might be to be able to recall contractors back to the site to clean up and rectify. Equally possible indemnity insurance could be secured to cover the same possibility.	Comments noted	No change to SPD
NEV-220	John Armour	-On the matter of land having environmental benefit there might be a particular category where no development would be permitted ie flood plains. Even those areas where there may be some doubt. Rising water levels are, unfortunately, going to cause problems in the future. This category and extensions to it may already have some protection.	Comments noted	No change to SPD
NEV-221	John Armour	Derelict land, land without any discernible management structure, are another category that could be included here. Owners/occupiers could be encouraged to pursue a management plan in line with Council policy.	Comments noted	No change to SPD
NEV-222	John Armour	'Brown Field' Sites always seem to present problems - possibly because of previous pollution - also for likely reasons of location etc. Somehow if these sites could be used for house building (being made more suitable, possibly with public money) then this would relieve pressure on more rural sites and protecting the existing environment.	Comments noted	No change to SPD

Email

Draft Supplementary Planning Documents (SPD): Natural Environment and Custom and Self-Build Housing

Dear Sir/Madam

We are emailing to consult you on the above two supplementary planning documents (SPDs) and with this email, we have enclosed two consultation notices for the SPDs. This will likely be the only consultation on these SPDs. Following consultation, all comments received will be considered and appropriate amendments made. The SPDs are then scheduled to be adopted by the Council later in 2020.

The first draft SPD sets out East Cambridgeshire District Council's approach to the **natural environment**, providing advice on policy requirements relating to it, including issues such as: 'net gain' in biodiversity through development proposals; protection and provision of trees; protection of existing nature sites; and supporting the Council's position in relation to the recently adopted Local Nature Partnership vision to 'double land for nature' by 2050 across Cambridgeshire.

Separately, the **Custom and Self-build housing** SPD provides guidance to large scale developers who are obliged to meet the Local Plan policy to provide self-build plots (i.e. development consisting of more than 100 dwellings should set aside a minimum 5% of plots for self-build purposes). The SPD also provides useful advice for individuals, groups or Community Land Trusts (or similar) that may be interested in providing self-build plots. Parishes that are interested in including self-build plots in their Neighbourhood Plans may also find this SPD useful.

Copies of the draft SPDs are available for public inspection:

- on the Council's website at: <http://www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents> and
- at reception of the Council Offices: The Grange, Nutholt Lane, Ely, Cambs, CB7 4EE between the hours of 8.45am - 5:00pm from Monday to Thursday, and 8.45am – 4.30pm on Friday.

The consultation period starts on **18 February 2020** and ends on **30 March 2020**. Only comments made during this period can be taken into account. Any comments made after the consultation period may be discarded.

You may submit your comments either by email to planningpolicy@eastcambs.gov.uk or send your comments via post to: Strategic Planning Team, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambs, CB7 4EE.

Please be aware all comments submitted on the SPDs will be made available for public inspection. As part of the process, we will also be producing a Consultation Report which will include a summary of all the comments received and the Council's response to these comments.

If you have any questions or queries regarding the draft SPDs consultation please contact the Strategic Planning Team on (01353) 665555 or email planningpolicy@eastcambs.gov.uk

Kind Regards,
Richard Kay
Strategic Planning Manager

List of all Consultees

<p>All Parish Councils Anglia Design LLP Anglian Water Services Limited Beacon Planning Ltd BGG Associates Ltd Bird & Tyler Associates Bloor Homes Bovis Homes Brand Associates BT Openreach Camal Architects Cambridge Past, Present & Future Cambridgeshire Cambridgeshire & Peterborough Combined Authority Cambridgeshire ACRE Cambridgeshire and Peterborough Clinical Commissioning Group Cambridgeshire City Council Cambridgeshire Constabulary Cambridgeshire County Council Cambridgeshire Fire and Rescue Services Cambridgeshire PCT Cambridhe Housing Group CAMRA CAMRA - Campaign for Real Ale Carter Jonas LLP Catesby Property Chatteris Town Council Chorus Homes City of Ely Council CJ Murfitt Limited Claires Chef Agency CLT East Co-Housing Network Colne Parish Council Cottenham Parish Council CPRE Cambridgeshire & Peterborough Create Buildings LLP Dalham Parish Council DC Blayney Associates Ltd DPDS Consulting Dudley Developments Eagle Home Interiors Ltd Earith Parish Council EDWARD GITTINS & ASSOCIATES LTD Huntingdonshire District Council</p>	<p>Ely Diocesan Board of Finance Ely Tool Hire Ltd Endurance Estates Strategic Land Ltd Environment Agency Exning Parish Council F.J. Pistol Holdings Ltd Feltwell Parish Council Fen Ditton Parish Council Fen Line Users Association Fenland District council Flagship Group Flavia Estates Fletcher Barton Forest Heath District and St Edmundsbury Borough Councils Forest Heath District Council Foundation East FP McCann Ltd Freckenham Parish Council Freebridge Community Housing Galliford Try Plc Gazeley Parish Council Gladman Development Limited Graham Handley Architects Granta Architects Greater Cambridgeshire Local Nature Partnership Green & Sons Land & Cattle Hanson UK Hastoe Housing Association HE Group Ltd Herringswell Parish Council Highways Agency Highways England Hilgay Parish Council Historic England Hockwold Parish Council Home Builders Federation Home Group Homes and Communities Agency Homes England Hopkins Homes Ltd Horningsea Parish Council Howes Percival LLP HPB Management Ltd RG&P Ltd</p>
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Hutchinsons	RLN (UK) Ltd
Iceni Homes	Sanctuary Group
Inland Waterways Association	Savills-Smith Gore
EE	Scotsdale Hill
Isleham Cricket Club	Scott Properties
James Mann Architectural Services	SE Cambs Liberal Democrats
JDR Cable Systems Ltd	Sentry Ltd
Jockey Club Racecourses Limited	Shaping Communities Ltd
Kennett Action Group	ShrimplinBrown Planning and Development
Kennett Community Land Trust	Simon J Wilson Architects
Kentford Parish Council	Soham CLT
Kings Lynn and West Norfolk District Council	Soham Town Council
Laragh Homes	South Cambridgeshire District Council
Lidgate Parish Council	Southery Parish Council
Lines Chartered Sureyors	Sport England
Lovell	Stow-cum-Quy Parish Council
Lyster Grillet & Harding	Straus Environmental
Manea Parish Council	Stretham and Wilburton CLT
Marine Management Organisation	Strutt and Parker
Mepal Parish Council	Strutt and Parker LLP
Ministry of Defence	Suffolk County Council
Mobile Operators Association	Sustrans East of England
Moulton Parish Council	Sutton Parish Council
National Grid	Swaffam Prior CLT
National grid	Swaffham Prior Community Land Trust
National Trust	Tetlow King
Natural England	The Coal Authority
Network Rail	The Ely Group of Drainage Boards
Newmarket Town Council	The Lady Frances Hospital Almshouse Charity
NHS England	The Wildlife Trust
NKW Design	The Woodland Trust
Norfolk County Council	Theatres Trust
Ousden Parish Council	Three
Palace Green Homes	Timothy Smith and Jonathan Taylor LLP
Pegasus Planning Group	UK Power Networks
Peter Humphrey Associates	Unex Corporation Ltd
Phase 2 Planning and Development	Universal Garage
Phillips Planning Services Ltd	Verity & Beverley
Pigeon Investment Management	Virgin Media
Places4People	Ward Gethin Archer
Plain View	Waterbeach Parish Council
Plainview Planning Ltd	Welney Parish Council
Planinfo	West Suffolk Councils
Planning Potential Ltd	Westbury Garden Rooms
Pocock and Shaw	Wildlife Trust BCN
Ragilbury Roots Ltd	Willingham Parish Council
Ramblers Association (North)	
Rapleys	
Red Lodge Parish Council	

Witchford CLT	Michael	Rose
Woods Hardwick Ltd	Andrew	Holland
WYG	Aidan and	
	Karen	Walmsley
Advance Land & Planning Ltd	Adrian	Fleet
Advance Planning	Alan	Kirk
Amec Foster Wheeler E&I UK	Alastair	Watson
Andrew Fleet MCIAT	Pamela	Joyce
Armstrong Rigg Planning	Alexa	Pearson
Ashley Parish Council	Christine	Ambrose Smith
Barton Willmore	David	Ambrose Smith
Beacon Planning Ltd	Amy	Wright
BGG Associates Ltd	Andrew	Taylor
Bidwells	Antony	Cornell
Brown & Co	Michael	Anthony
Cambridgeshire County Council	Bridget	
Carter Jonas LLP	Lesley	Audus
Cheffins	Robert	Thomson
Churchgate Property	Ian	Wright
City of Ely Council	Stephen	Butler
CODE Development Planners	Alison	Bye
Construct Reason LTD	Cary	Simpson
Deloitte Real Estate	Conor	O'Brien
Denley Draughting Limited	Phyllis	Rusk
Eclipse Planning Services	Cheryl	Jowett
Education and Skills Funding Agency	Cheryl	Cox
Edward Gittins & Associates	Clare	French
EJW Planning Ltd	Su	Field
Framptons Town Planning Ltd	Catherine	Judkins
Freemantle Developments Limited	Francesca	Wray
Gladman Development Limited	Chris	Hurrell
Haddenham Parish Council	Catherine	George
Historic England	Dale	Ingham
Hollins Strategic Land	David	Porter
Hopkins Homes Ltd	David	
Howes Percival LLP	Charles	Werner
Hutchinsons	David	Watson
Indigo Planning	Dawn	Buck
Infinity Architects	David	Chaplin
JMS Planning & Development Ltd	Diana	Ward
Juniper Real Estate	Diana	Donald
K Garnham Design	Gary	Lindsay
King West	Geoffrey	Reed
Lacy, Scott & Knight	George	Rusk
Manor Investments Ltd	Gareth	Maslen
Martindales Architects Ltd	Graham	Thompson
Mattanna Ltd	Greg	Saberton
MWS Architectural	Geoffrey	Woollard
Navigate Planning Ltd	Hilary	Threadgold
NJL Consulting	Hugo	Upton
Oxalis Planning Ltd		
Pegasus Group		
Pegasus Planning Group		
Percival and Company		
Peter Brett Associate LLP		
Pigeon Investment Management Ltd		
PlanSurv Ltd		
Pocock & Shaw		

PRP	Ian and Birgit	Boylett
Rapleys LLP	Ian	Gilbert
Redrow Homes Ltd	Jacqueline	Jones
Richborough Estates Ltd	P.J	Smith
RPS Consulting	B & V	Roberts
RPS Planning & Development	Aaron	Jacobs
Savills	James	D'Souza
Savills (UK) Ltd	Lesley Jan	Eaton
Simon Pott and Co	Jenny	Sherlock
Strutt and Parker	John	Rees
Strutt and Parker LLP	Jo	Braybrooke
Swann Edwards Architecture	John	Bridges
Sworders	John	Powell
Tetlow King Planning	John	Armour
The Design Partnership (Ely) Ltd	John	San Vicente
The Environmental Partnership	Jonathan	Cook
Third Party Delivery Ltd	John W	Smith
Town Planning Intelligence	Katharine	Cantell
Troy Planning & Design	Karl	Dunn
Turley Associates Ltd	Kevin	Arrowsmith
Unex Corporation Ltd	Laura	Ross
William H Brown	Lauren	Whitworth
Williams Griffiths Architects	Lisa	Stubbs
Wood PLC	Elizabeth	Hunter
Woolley Project Management Limited	Elizabeth	Houghton
WYG	Lorna	Dupre
WYG Planning & Environment	Mark	Inskip
Amy Richardson	Malcolm	Palmer
Andrew Boughton	Mark	Goldsack
Ben Pridgeon	Michael	Murfitt
Marilyn Strand	Edwina	Newbury
David Barker	Niki	Allsop
Ellie Zdyrko	Nigel	Cooper
Margaret Franklin	Mark	Robertson
Ian Smith	Phil	Newell
Jamie Palmer	David	Alberry-King
Jackie Ford	Christopher	Threadgold
Kate Wood	Peter &	
Meghan Bonner	Laura	Wood
Andrew Fleet	Malcolm	Malcolm Roper
Mark Baker	Bob	Joy
Mark McGovern	Rhodri	Pashley
Nina Crabb	Rachel and	
Peter Frampton	John	Rees
Rebecca Sharpe	Roger &	
Sarah Hornbrook	Jennifer	Johnson
SJK Planning	Robert	Boyle
Suzanne Nugent	Robert	Algar
Tony Welland	Robin	Threadgold
Richard Agnew	Roderick	Smith
Terry Frost		
Alison Glover / Spencer		
Lisa O'Mahony		
Tim Bonavia		
Philip Scott		
Tom Edwardes		

Anthony	Jolley	Rod	Hart
Anthony	Weston	Rodger	Germany
stygol	Stygol	Roy	Pallett
Trevor	Edwards	Angus	Runciman
Anthony	French	Ruth	Paskins Gordon
Viva Arts and Community Group		Ryan	Jones
Daniel	Pullan	Sue	Burnell
Peter	Landshoff	Frank and	
Maureen	Munks	Shirley	Broadfield
Becky	Lockyer	Stuart	Cooper
		shelagh	Monteith
		Simon	Raffe
		Selina	Boyce
		Stephen	Burgess
		Steve	Plumb
		Susan	Frankland