

## Question 24: Natural Environment

50103

### Consultee

Title

First Name Melanie

Surname Atwell

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50103-53 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Yes

50039

### Consultee

Title

First Name Hilary

Surname Bailey

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50039-43 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

There should be an ambitious target for tree planting. Wildlife corridors should be identified and protected.

We need to understand that even "commonplace" wildlife will be under threat if their environments are destroyed. Unique microcosms such as Wenny Meadow need to be identified and designated as Local Green Space. All mature trees should be protected by TPOs, and the penalty for violating a TPO should be escalated to become a meaningful deterrent.

50007

### Consultee

Title

First Name Serena

Surname Bailey

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50007-58 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

By protecting nature outdoor green space and not building on areas which are full of biodiversity such as Wenny Meadow in Chatteris.

## Question 24: Natural Environment

50046

### Consultee

Title

First Name Bryan

Surname Baker

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50046-59

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Green spaces within each development and children's play areas in each new development.

50081

### Consultee

Title Mr

First Name Martin

Surname Baker

Position

Organisation Wildlife Trust for Bedfordshire, Cambr

### Agent

Title

Name

Surname

Position

Organisation

50081-17

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

The Local Plan will need to expand upon the limited natural environment policies of recent local plans that concentrate mainly on designated sites and trees. These policies remain relevant, but much greater vision and investment in the natural environment will be required. The new Local Plan should include a policy requiring a minimum of 10% net biodiversity gain, with an aspiration for 20%. A high figure is justified in Fenland due to the below average land cover of natural habitats, the lack of strategic and local accessible natural greenspaces, and the need to invest in the natural environment to attract inward investment and improve health and well-being. Fenland DC will also need to prepare and adopt (either by themselves, or in collaboration across Cambridgeshire and Peterborough ) a nature recovery strategy, that incorporates a strategy for biodiversity offsetting, so that financial contributions arising from biodiversity net gain can be directed to the most beneficial locations. Through implementation of biodiversity net gain policies and an offsetting strategy is should also be possible to promote the creation of strategic and local natural greenspaces for each of the market towns and larger villages (also see comments on open space).

## Question 24: Natural Environment

50059

### Consultee

Title Mr  
First Name Mark  
Surname Behrendt  
Position Planning Manager  
Organisation Home Builders Federation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50059-12 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

As the Council recognise in the consultation document, the Government are currently in the process of preparing legislation to require development s to provide net gains in biodiversity. If this does become a requirement the Council will need to ensure that its impact on viability is properly tested. Having reviewed the Council's viability assessment we note that the Council has increased the fees assumption by 1% to cover the potential costs of this policy. This is unlikely to be sufficient. Delivering a minimum 10% net improvement in biodiversity will have a significant cost impact on development. In particular the cost of developing greenfield sites could be a considerable expense and a more considered approach as to the impact of this policy requirement is necessary. The Government's latest impact assessment<sup>1</sup> suggest an average cost in the region of £20,000 per hectare. However, research by Savills<sup>2</sup> suggests that this could be substantially more at between £9,000 and £15,000 per dwelling.

50117

### Consultee

Title  
First Name Sharon, Patricia Joyce and Melanie  
Surname Bester, Whittlesey and Curl - C/O NYC  
Position  
Organisation

### Agent

Title Mr  
Name Richard  
Surname Mowat  
Position  
Organisation Johnson Mowat

50117-44 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Ensuring a net benefit as per national guidance.

50086

### Consultee

Title Mr  
First Name Lee  
Surname Bevens  
Position  
Organisation L Bevens Associates Architects Ltd

### Agent

Title  
Name  
Surname  
Position  
Organisation

50086-52 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

New development generally enhances biodiversity

## Question 24: Natural Environment

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50122

### Consultee

Title

First Name Robert

Surname Boddington

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50122-60 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Double the tree planting in all towns and develop "pocket parks" as in March.

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50106

### Consultee

Title Councillor

First Name Gavin

Surname Booth

Position

Organisation Parson Drove Parish Council

### Agent

Title

Name

Surname

Position

Organisation

50106-49 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Yes

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50029

### Consultee

Title

First Name Ted

Surname Brand

Position

Organisation Brand Associates Architects

### Agent

Title

Name

Surname

Position

Organisation

50029-40 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Yes

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## Question 24: Natural Environment

50090

### Consultee

Title

First Name Fiona

Surname Bryan

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50090-60

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Specific areas should be allocated as nature reserves. Trees should be planted. Wildflowers should be sewn along roadsides. Green roofs should be encourage on businesses and new housing.

50060

### Consultee

Title

First Name Nicole

Surname Burnett

Position Senior Planner

Organisation Gladman

### Agent

Title

Name

Surname

Position

Organisation

50060-19

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Gladman note that the consultation document refers to national policy encouraging net gain for biodiversity and the government consultation on this becoming a mandatory requirement. Whilst Gladman accept this reference to national policy it is important that long term impacts are considered when reviewing proposals for biodiversity net gain taking into account that many of the measures provided as part of the development will need to mature beyond the build period.

Gladman also take the opportunity to 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.

With regards to the protection of best and most versatile agricultural land, Gladman refer to paragraph 170 of the NPPF (2019) which sets out that planning policies (and decisions) should recognise the economic and other benefits of best and most versatile land. As such, the loss of best and most versatile land should be considered in the context of the overall planning balance. It is important that any policy brought forward through the FLP does not go beyond the requirements of national policy.

## Question 24: Natural Environment

50070

### Consultee

Title

First Name C

Surname Burrell

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50070-33 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Yes

50083

### Consultee

Title

First Name Andrew

Surname Burrell

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50083-51 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Yes as this is important to all out wellbeing

50022

### Consultee

Title Mr

First Name Adrian

Surname Cannard

Position

Organisation Cambridgeshire & Peterborough Com

### Agent

Title

Name

Surname

Position

Organisation

50022-28 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

As referenced, the Combined Authority has endorsed the ambition of doubling the area of rich wildlife habitats and greenspaces, and will continue to work with the Local Nature Partnership and Fenland Council on how that can be delivered.

## Question 24: Natural Environment

50027

### Consultee

Title

First Name

Surname Cannon Kirk

Position

Organisation

### Agent

Title

Name Andrew

Surname Hodgson

Position

Organisation Pegasus Group

50027-59 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

No comment

50109

### Consultee

Title

First Name Steve

Surname Count

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50109-8 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Include it as a consideration

50124

### Consultee

Title

First Name Charlotte

Surname Dew

Position

Organisation Larkfleet Homes

### Agent

Title

Name

Surname

Position

Organisation

50124-47 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

The government have introduced the principles of biodiversity net gain which related to leaving the natural environment in a measurably better state than beforehand. The Environment Bill requires developers to ensure habitats for wildlife are enhanced, with a 10% increase in habitat value for wildlife compared with the pre-development baseline. The current process is to use a biodiversity matrix to calculate a developments net gain figure. The matrix is currently undergoing consultation however, it does not accommodate for some of the improvements we make on our schemes such as installing bird and bat boxes. The local plan will have to abide by the Environment Bill however, the council's method of calculating net gain should be interpreted differently.

## Question 24: Natural Environment

50010

### Consultee

Title

First Name Eamonn

Surname Dorling

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50010-60 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Keep development and water contamination away from such areas including Environmental Agency work on waste sites.

50018

### Consultee

Title Councillor

First Name James

Surname Downes

Position

Organisation Leverington Parish Council

### Agent

Title

Name

Surname

Position

Organisation

50018-60 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Must leave green spaces.

50127

### Consultee

Title

First Name Valerie

Surname Emmons

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50127-43 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

By implementing the protection of existing natural green spaces and wildlife rather than just talking about it. Such areas are rare in Fenland and need protection from building-mad Town Councillors.



## Question 24: Natural Environment

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50119

### Consultee

Title

First Name Maxim

Surname Emmons

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50119-30

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

By supporting 'Open Green Spaces' applications.

50100

### Consultee

Title

First Name Susanah

Surname Farmer

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50100-59

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Mixed development - more green spaces, especially trees and woodland. Nature reserves and wild areas - current green spaces often play areas or highly managed.

## Question 24: Natural Environment

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50031

### Consultee

Title Mr  
First Name Colum  
Surname Fitzsimons  
Position  
Organisation Cambridgeshire County Council

### Agent

Title  
Name  
Surname  
Position  
Organisation

50031-11

### 24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

The Fenland Local Plan should take a “strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries” (paragraph 171, NPPF 2019). We recommend this is achieved through the production of a biodiversity / green infrastructure Development Plan Document (DPD). We also suggest that a Fenland natural capital investment planning should be undertaken to identify the most effective way to deliver appropriate environmental net gain through Fenland. The Biodiversity / GI DPD should be produced as part of the Local Plan to “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks”, as required by NPPF 2019 (paragraph 174), and opportunities for enhancement (as well as other GI elements). This mapping should be based on up-to-date evidence and therefore recommend that condition assessments of all County Wildlife Sites in Fenland be undertaken. We suggest the map is based upon the Cambridgeshire & Peterborough Habitat Opportunity Maps, alongside consultation with local nature conservation experts. It should be noted that the Habitat Opportunity Maps are based on 1990s habitat survey data and therefore, we recommend that ground-truthing for 10% of the Fenland area be undertaken to ensure accuracy. The Biodiversity / GI DPD should set out the key requirements for the district’s measurable biodiversity net gain (BNG) requirements. We suggest that a target of 20% net gain in biodiversity value be set across development in Fenland, in order to deliver a measurable net gain in biodiversity (NPPF 2019). This figure has been derived locally for Cambridgeshire and Peterborough through consultation with local government ecologists and Wildlife Trust based on the region having a more impoverished natural environment than most of England. In addition, it should also consider how measurable biodiversity net gain will be delivered, particularly where proposed development will fall below the BNG threshold (e.g. financial contribution to biodiversity off-setting projects), as well as securing long-term management & monitoring for all BNG schemes to ensure habitats establish and achieve biodiversity net gain (e.g. 30 years). The Biodiversity DPD should include a suite of planning policies for conservation of wildlife sites, habitats and species of international, national and local importance. This should include priority habitats and species, along with Cambridgeshire and Peterborough Additional Species of Interest. Consideration for sites of geological interest should also be considered, including those of national and local importance. The Cambridgeshire Geological Society is currently undertaking a programme to identify sites of local geological importance across the county and therefore, we recommend they be consulted with regards work within Fenland area (Cam Geosites team).

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## Question 24: Natural Environment

50101

### Consultee

Title

First Name Roger

Surname George

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50101-60

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

No development on farmland or wildlife areas. Supplement other existing financial incentive schemes for planting of trees and hedges.

50032

### Consultee

Title Mr

First Name Iain

Surname Green

Position Senior Public Health Officer

Organisation Cambridgeshire County Council (Publi

### Agent

Title

Name

Surname

Position

Organisation

50032-60

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Public health have no views on how the Local Plan should protect and enhance biodiversity and the natural environment, except that it should.

50077

### Consultee

Title

First Name M J

Surname Hawkins

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50077-21

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Yes

## Question 24: Natural Environment

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50033

### Consultee

Title Mr  
First Name Mark  
Surname Hemment  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50033-30

### 24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

Local Green Spaces designations, combined with hard settlement boundaries, should be used to protect existing natural areas. Allowing development on natural green spaces will not result in a 'net gain' in biodiversity. Especially when those natural spaces are mature. Any 'offsets' from developers will require, in some cases, more than a century to reach the same maturity. There should be a tree replacement policy, particularly on council owned land. Currently, diseased trees are removed and not replaced. This is not a sustainable policy and goes against the "Our natural environment is our most precious inheritance" statement.

50012

### Consultee

Title Mrs  
First Name M Sadie  
Surname Heritage  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50012-39

### 24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

It is essential that we keep, and maintain the open spaces we have. It would be good to plant wildflowers and trees to engage wildlife alongside paths and water courses.

50128

### Consultee

Title  
First Name Stephen  
Surname Hodson  
Position  
Organisation Hodsons

### Agent

Title  
Name  
Surname  
Position  
Organisation

50128-52

### 24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

By protecting and replacing hedgerows in the countryside and have good landscaping schemes for housing which are policed.

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## Question 24: Natural Environment

50003

### Consultee

Title Ms  
First Name Ruth  
Surname Hufton  
Position

### Agent

Title  
Name  
Surname  
Position  
Organisation

Organisation Doddington Parish Council

50003-57 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Encourage local ideas like pond renovation and upkeep and tie this in with local primary and secondary schools. Encourage more tree planting and better upkeep and signing of archaeological and historic sites

50056

### Consultee

Title Ms  
First Name Shanna  
Surname Jackson  
Position Chartered Town Planner

### Agent

Title  
Name  
Surname  
Position  
Organisation

Organisation Swann Edwards Architecture Limited

50056-54 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

By identifying biodiversity 'hotspots' and buffer zones so that developers are aware from the outset where new development can/cannot be located.

50069

### Consultee

Title Mr  
First Name Simon  
Surname King  
Position

### Agent

Title  
Name  
Surname  
Position  
Organisation

Organisation

50069-49 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

A new area of open space as part of the Wisbech Garden Town proposal

## Question 24: Natural Environment

50125

### Consultee

Title  
First Name  
Surname Kings Dyke Business Park Ltd  
Position  
Organisation

### Agent

Title Mr  
Name Ed  
Surname Durrant  
Position  
Organisation Pegasus Group

50125-33 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

The provision of landscape and water attenuation features often deliver a net gain in biodiversity over land that is in arable use, or previously developed land. Therefore, these matters are routinely addressed through the planning application process.

50079

### Consultee

Title Mr  
First Name Peter  
Surname Lankfer  
Position  
Organisation

### Agent

Title Mr  
Name Tom  
Surname Nellist  
Position  
Organisation Trundley Design

50079-59 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

In any means possibl

50095

### Consultee

Title  
First Name Barrie  
Surname Luck  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50095-55 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

yes

## Question 24: Natural Environment

50089

### Consultee

Title

First Name Karen

Surname Luck

Position

Organisation Romain

### Agent

Title

Name

Surname

Position

Organisation

50089-46

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Yes

50044

### Consultee

Title Ms

First Name Debbie

Surname Mack

Position Historic Environment Planning Adviser

Organisation Historic England

### Agent

Title

Name

Surname

Position

Organisation

50044-15

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Landscape parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation. It may be helpful to make reference in the text to the role that green infrastructure can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link green infrastructure networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of green infrastructure networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.

50035

### Consultee

Title Mr

First Name Tim

Surname Marks

Position

Organisation MVV Environment Ltd

### Agent

Title

Name

Surname

Position

Organisation

50035-22

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

It is not always possible for developers to accommodate a 'net gain' onsite therefore any policy should be flexible to allow for off-site provision and/or contributions to other local schemes that seek to improve biodiversity.

## Question 24: Natural Environment

50042

### Consultee

Title

First Name Jane Ann

Surname Mason

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50042-39 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Applying more Tree Preservation Orders to existing trees and actually applying TPO penalties for developers or individuals who cut down or attempt to destroy trees with preservation orders. By assigning natural green spaces and understanding the nature of ecosystems. By letting nature find its own way, rather than attempting to contain and control it. Ecosystems can exist at local level, a meadow for example will have its own biodiversity, each creature, plant and tree dependent upon each other.

50038

### Consultee

Title Mr

First Name Ian

Surname Mason

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50038-36 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

By looking at the plans for The Cambridge Green Infrastructure Strategy so ably produced in 2011 and what Natural England/Cambridge the Tree Czar, Public Health England in its Health Equity Evidence Review 2014 and the Open Spaces Society say. Especially the former, which has addressed each fenland town as bespoke, specific communities with opportunities and needs.

50073

### Consultee

Title Mr

First Name John

Surname Maxey

Position

Organisation Maxey Grounds

### Agent

Title

Name

Surname

Position

Organisation

50073-60 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Sufficient National policies exist



## Question 24: Natural Environment

50129

### Consultee

Title Mrs  
First Name J  
Surname Melton  
Position

### Agent

Title  
Name  
Surname  
Position  
Organisation

Organisation Chatteris Town Council

50129-56 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

TPO maps should be updated and tree planting encouraged. The local landscape should be protected, pollution discouraged and air quality improved.

50126

### Consultee

Title  
First Name Alan  
Surname Melton  
Position  
Organisation Manea Parish Council

### Agent

Title  
Name  
Surname  
Position  
Organisation

50126-60 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Yes

50028

### Consultee

Title Mr  
First Name Graham  
Surname Moore  
Position Planning Officer  
Organisation Middle Level Commissioners

### Agent

Title  
Name  
Surname  
Position  
Organisation

50028-9 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Comment - A new Local Plan is a huge opportunity to boost the natural environment. This should include wildlife spaces being created as part of new residential developments (as well as recreational spaces) to allow people access to nature in their daily lives. Putting in place requirements for developers to incorporate relevant biodiversity measure into new builds - at a minimum this should include 'swift bricks' and provisions for hedgehogs.  
SuDS should be essential in slowing the flow of and improving the quality of water entering drains. See also the additional relevant items discussed elsewhere in this response.

## Question 24: Natural Environment

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50015

### Consultee

Title Mr  
First Name Geoff  
Surname Newham  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50015-48

### 24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

Where we can increase wildlife parks, and natural spaces, we should.

Encourage farmers to reduce their reliance on pesticides, herbicides and insecticides - these chemicals poison the land, dykes and drains and all that live in them, including us.

Instead encourage wild/wildflower margins, re-wild areas (grants available), create wildflower road verges (Every council has the plan for this and are encouraged to adopt it – see PlantLife’s Website).

Stop landowners shooting our native wildlife for Sport (we know it is dressed up as conservation but it is not so.) Protect our natural environment and make it truly natural.

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## Question 24: Natural Environment

50023

### Consultee

Title Ms  
First Name Janet  
Surname Nuttall  
Position Sustainable Land Use Advisor  
Organisation Natural England

### Agent

Title  
Name  
Surname  
Position  
Organisation

50023-12

### 24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

Natural Environment We welcome reference to the biodiversity net gain aspirations of the Defra 25 Year Environment Plan, the NPPF and Natural Cambridgeshire's Doubling Nature vision; the vision has been endorsed by the Combined Authority and recently translated into the Cambridgeshire Doubling Nature Investment Plan. The Environment Bill mandates the delivery of at least 10% measurable biodiversity net gain through all relevant development.

We support recognition of the hierarchy of international, nationally and locally designated sites and the presence in Fenland of the Nene Washes Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site and the Ouse Washes SPA, SAC and Ramsar site in addition to several SSSIs and locally designated wildlife sites. We welcome recognition of the need to protect and enhance designated sites and wider biodiversity, landscape and best and most versatile (BMV) and to improve air quality.

We agree that the Local Plan should support opportunities to create new habitats in areas which would provide the most ecological benefit as identified through the Cambridgeshire and Peterborough Biodiversity Group habitat opportunity mapping project. A strategy should be prepared, as discussed above, to inform the appropriate location of site allocations and to identify opportunities for delivery of biodiversity and green infrastructure enhancement projects through the Plan's major development and biodiversity and green infrastructure policies. This will help the Council to make a significant contribution towards the Combined Authority's Doubling Nature Vision.

Question 24: How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

Designated sites The Local Plan should set criteria based policies to recognise the hierarchy of designated biodiversity and geological sites and ensure their protection. Such policies should clearly distinguish between international, national and local sites<sup>2</sup>. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites<sup>3</sup> should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.

## Question 24: Natural Environment

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Biodiversity and Geodiversity The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity through all relevant development including housing, transport and community infrastructure. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment. The biodiversity policy and wider Plan preparation should apply the mitigation hierarchy and promote delivery of biodiversity net gain, in accordance with paragraphs 170 and 174 of the NPPF.

As indicated above, we advise the Council to prepare a map of the existing ecological network including designated sites, priority habitats and other important green spaces to identify key areas for protection and delivery of strategic / landscape-scale enhancements. This should be used to develop a strategy to inform the appropriate location of site allocations and to identify opportunities for delivery of biodiversity and green infrastructure enhancement projects through the Plan's major development and biodiversity and green infrastructure policies.

Ideally the policy should include a requirement for proposals to be accompanied by a biodiversity survey, including an audit of gains and losses, based on the Defra 2.0 metric or very similar methodology. Developer's should also be required to consider Natural England's IRZs to ensure that potential direct and indirect impacts to designated sites, including recreational pressure, are appropriately assessed and that any adverse impacts can be satisfactorily mitigated.

The policy should seek to safeguard the value of previously developed land where it is of significant importance for biodiversity and/or geodiversity.

Priority habitats, ecological networks and priority and/or legally protected species populations Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the  
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Forestry Commission have produced standing advice on ancient woodland, ancient and veteran trees.

The policy should include a commitment to work with developers and Natural England to identify a strategic approach to great crested newt mitigation, where this is required, on major sites and other areas of key significance for this species.

## Question 24: Natural Environment

**Green Infrastructure** Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health and well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

We advise the Council to prepare a map of the existing ecological network and opportunities for enhancement. An accompanying strategy should identify opportunities for delivery of biodiversity and green infrastructure enhancement projects through the Plan's major development and biodiversity and green infrastructure policies. The policy should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF. Natural England's Cambridgeshire Accessible Greenspace Analysis (2010) may be of use when considering current level of provision whilst our Accessible Natural Greenspace Standard (ANGSt) offers useful guidance to developers.

Provision of sufficient quantity of high quality alternative natural greenspace is an important tool in mitigating the effects on recreational pressure associated with new housing development on more sensitive SSSIs. 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.

**Landscape** Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria based policies to guide development.

**Access and Rights of Way** Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities and avoid building on open space of public value as outlined in paragraph 97 of the NPPF.

## Question 24: Natural Environment

50011

### Consultee

Title

First Name Alex

Surname Patrick

Position

Organisation Alexandra Design

### Agent

Title

Name

Surname

Position

Organisation

50011-27 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Encourage local green areas to be tree/shrub planted within and around the boundaries

Planting around agricultural fields too.

50008

### Consultee

Title

First Name John

Surname Revell

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50008-3 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

The network of rivers in Fenland provide essential flood control and irrigation for some of the most productive agricultural land in the UK. Improving paths and tracks that border the rivers is a cost effective way to increase local leisure activities whether for fishermen, bird watchers, those walking dogs, those ambling or pushing prams or the keen long distance walkers. The lack of hills also mean that the paths will normally be flat and suitable for disabled people in wheelchairs

50040

### Consultee

Title Mrs

First Name J

Surname Richardson

Position

Organisation Benwick Parish Council

### Agent

Title

Name

Surname

Position

Organisation

50040-58 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Protect rivers from being built at the side of and keeping walks; Protect woods; Make it easier for a change of use to support projects e.g Great Fen Project

## Question 24: Natural Environment

50082

### Consultee

Title

First Name Bryan

Surname Rose

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50082-59

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Stop the indiscriminate rape of our countryside

## Question 24: Natural Environment

50055

### Consultee

Title

First Name Nick

Surname Sandford

Position Regional External Affairs Officer

Organisation The Woodland Trust

### Agent

Title

Name

Surname

Position

Organisation

50055-1 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

As the UK's leading woodland conservation charity, the Woodland Trust's vision is for a UK rich in native woods and trees, for people and wildlife. We work to protect, restore and create native woods, trees and their wildlife for the future. We manage over 1,250 sites, including over 200 sites in the South West, and have 500,000 members and supporters.

We welcome the opportunity to comment on the 'issues and options' stage of the new Fenland Local Plan. I was unable to make the online consultation form work, so I was advised it would be ok to submit my comments in an email.

#### Woodland Protection

The Woodland Trust believes it is essential to consider, at this early stage of reviewing the local plan, the protection of woods and trees, particularly irreplaceable ancient woodland and any opportunities for woodland creation. This is important in the context of the high level of housing growth and infrastructure development that will be taking place in Fenland.

It is important the plan recognises that ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of biodiversity, but because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable. Their long continuity and lack of disturbance means ancient woods are often also living history books, preserving archaeological features and evidence of past land use, from earthworks to charcoal pits. They are also places of great aesthetic appeal, making them attractive for recreation and the many benefits this can bring in terms of health and well being.

With only 2.4% of the land area in Great Britain covered by ancient woodland, it is essential that no more of this finite resource is lost through development pressure or mismanagement. This means that ancient woodland must be protected absolutely from permanent clearance, but also that it must be protected from damaging effects of adjacent and nearby land-use that could threaten the integrity of the habitat and survival of its special characteristics.

The Woodland Trust would therefore like to see the Local Plan make explicit reference to the protection of ancient woodland, and ancient and veteran trees outside woods, by stating that development affecting ancient woodland should only be considered in wholly exceptional circumstances, which would be in line with the enhanced level of protection given to these habitats in the para 175c of the revised National Planning Policy Framework in 2018.

We support securing a net gain in biodiversity from development but this must not be at the expense of allowing irreplaceable habitats to be lost.



## Question 24: Natural Environment

### Woodland Creation

The scale of proposed housing growth and infrastructure development in Cambridgeshire could be a threat to our natural environment but, when well-planned and resourced, can also provide an opportunity to deliver green infrastructure. It is essential that there is an ambitious approach to ensuring every opportunity is taken to achieve 'net gain' for biodiversity through the planning process.

We would like to see Fenland Council set an ambitious vision for green infrastructure through its Local Plan review process.

The Woodland Trust believes that trees and woods can deliver a wide range of benefits, and this is strongly supported by current national planning policy. Woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits: - these include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, air quality flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets and supporting agroforestry).

The National Planning Policy Framework (NPPF) supports the need for more habitat creation and the England Biodiversity Strategy makes it clear that expansion of priority habitats like native woodland remains a key aim - 'Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England', (Biodiversity 2020: A strategy for England's wildlife and ecosystems services, DEFRA 2011, p.26).

The levels of development proposed for the area create parallel opportunities for environmental growth, and it is essential that a range of green infrastructure should be prioritised at the outset including clear targets to increase tree canopy cover across the plan area. The Woodland Trust would like to see a strong commitment here to the expectations on developers to provide trees as part of a new development or of any regeneration scheme. Our guide to residential developments and trees may help to provide a framework.

The Woodland Trust recommends that our Woodland Access Standard be adopted here as a measure of success. This standard aims to ensure everyone has reasonable access to woodland – as encapsulated in our Space for People publication.

The Woodland Trust's Woodland Access Standard aspires that:

- o No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size; and
- o There should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes

Woods make particularly outstanding green spaces for public access because of the experience of nature they provide, their visual prominence alongside buildings which offers balance between the built and natural worlds, their low maintenance costs and their ability to accommodate large numbers of visitors. Woodland and related activities can also be valuable in promoting social inclusion. Woodland activities, such as tree planting, walking and woodland crafts, can provide a forum for people of all ages and cultural backgrounds to come together to learn about and improve their local environment. The extensive links between woodland and health is now firmly embedded in national Government policy for health, planning and forestry –

- Health: "Access to green spaces is associated with better mental and physical health across socioeconomic groups....Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where tree cover would help to improve residents' quality of life and reduce the negative effects of deprivation, including health inequalities." Healthy Lives, Healthy People (Government White Paper, November 2010, paras 3.36-37).
- Planning: Para 175 (d) of the NPPF states: d) development whose primary objective is to

## Question 24: Natural Environment

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conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

- Forestry: “Our trees, hedgerows, woods and forests contribute significantly to the quality of life in both rural and urban areas. Amongst other things, they enhance the local environment and biodiversity, support economic growth through regeneration, help mitigate the impact of climate change, assist in reducing air pollution and provide important health and educational benefits....The Natural Environment White Paper recognised the value and potential for green spaces to support and contribute to everyone’s health and well-being. This is being reflected in the Public Health Outcomes Framework, which underpins the new public health duty of local authorities’. Government Forestry Policy Statement (Defra, January 2013, p.16).

A recent report from Natural England highlights recent good practise in social prescribing for mental health, in particular the role of nature-based interventions (Natural England, 2017). It demonstrates the benefits of green prescriptions for mental health, wellbeing and the NHS budget. The report cites a study of social prescriptions for woodland health promotion activities for those with mental health problems in Scotland, which ranked as a ‘highly cost effective’ intervention for health by NICE benchmarks (Willis et al., 2016; Buck, 2016).

### Benefits of trees and woods

Finally on flooding, Trees and woodland can reduce localised flooding and alleviate the effects of larger floods in a variety of ways, including:

- Water penetrates more deeply into the woodland soils (higher infiltration rates) leading to less surface run-off.
- Trees, shrubs and large woody debris alongside rivers and streams and on floodplains act as a drag on flood waters, slowing down floods and increasing water storage.
- Trees protect soil from erosion and reduce the sediment run-off, which help the passage of water in river channels, reducing the need for dredging.
- The greater water use of trees can reduce the volume of flood water at source.
- Trees slow the speed at which rain reaches the ground, with some rain evaporating into the atmosphere - even in winter native deciduous trees intercept up to 12% of rainfall.

A joint Environment Agency/Forestry Commission publication Woodland for Water: Woodland measures for meeting Water Framework objectives states clearly that: ‘There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives’ (Environment Agency, July 2011- <http://www.forestry.gov.uk/fr/woodlandforwater>).

In addition to water management, trees can combat the effects of urban heat island and have a role in improving air quality.

Trees & woods can play a significant role in sustaining the landscape scale connectivity that underpins ecological resilience and helps combat climate change effects. The varied and unique habitats woodland sites provide for many of the UK’s most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost.

The recent announcement in the Government’s 25 year Environment Plan on the Northern Forest project highlights the political commitment to woodland creation and the document contains numerous references to the need for large scale woodland creation, for example: “Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042” .

More recently the Government’s independent committee on climate change has recommended that 1.5 billion trees be planted in the UK by 2050 in order for the Government to achieve its carbon reduction

## Question 24: Natural Environment

targets. <https://www.independent.co.uk/environment/uk-tree-planting-climate-change-billion-committee-net-zero-emissions-a9026726.html> . We are finding that councils across the country are interested in planting trees and creating woodland. We would urge the Council consider a headline target for tree planting, along the lines of the “plant a tree for every person” targets adopted by many towns and cities including Peterborough, although some would argue that even more ambitious tree planting targets are needed.

Targets can also be set in terms of tree canopy cover. For example, Wycombe Council is requiring all new development to have 25% tree canopy cover. Funding for this can be secured through developer contributions through Section 106 or CIL.

We hope you will take these comments into consideration as part of the consultation process. If you have any queries, please do not hesitate to get in touch via this email address [nicksandford@woodlandtrust.org.uk](mailto:nicksandford@woodlandtrust.org.uk)

50094

### Consultee

Title

First Name Gerald

Surname Seabrook

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50094-32

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Providing green space to encourage wildlife

50026

### Consultee

Title Mr

First Name Jonathan

Surname Stone

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50026-60

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

The CCG does not have any recommendations on how the local plan can protect and enhance biodiversity and the natural environment.

## Question 24: Natural Environment

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50087

### Consultee

Title

First Name Paula

Surname Syred

Position

Organisation Fox Narrowboats

### Agent

Title

Name

Surname

Position

Organisation

50087-2 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

The fens are a unique landscape created by man and need management and protection against flooding to maintain the unique environment for flora, fauna and wildlife

50088

### Consultee

Title

First Name Richard

Surname Tester

Position

Organisation

### Agent

Title

Name

Surname

Position

Organisation

50088-59 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

By not doing what is being proposed in our village. That is to further spread the housing into nearby agricultural fields which has an adverse impact on the natural environment.

50034

### Consultee

Title

First Name Katie

Surname Thornley

Position Senior Finance Manager

Organisation Cambridgeshire and Peterborough Sus

### Agent

Title

Name

Surname

Position

Organisation

50034-58 **24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

We would not prioritise this.

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## Question 24: Natural Environment

50084

### Consultee

Title

First Name

Surname

Position

Organisation

Triman Developments (UK) Limited an

### Agent

Title

Name

Surname

Position

Organisation

Mr

Simon

Machen

Barmach Ltd

50084-52

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

Sensitive design of new development to enhance biodiversity. Partnership working with the Local Nature Partnership.

50030

### Consultee

Title

First Name

Surname

Position

Organisation

Kate

Waller

Elm Parish Council

### Agent

Title

Name

Surname

Position

Organisation

50030-59

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

The Council believes that the Local Plan should protect and enhance biodiversity and the natural environment by protecting existing hedgerows and where possible requiring professional advice to be taken before work is undertaken regarding standards of maintenance etc., by promoting and protecting green links between villages and maintaining green boundaries around and between built up areas

50050

### Consultee

Title

First Name

Surname

Position

Organisation

Lynda

Warth

County Access & Bridleways Officer –

British Horse Society

### Agent

Title

Name

Surname

Position

Organisation

50050-9

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

But it will be the rights of way network that will be / should be used to access these green spaces and are therefore an integral part of this requirements. Again, there should be access on all these spaces for all users including equestrians.

## Question 24: Natural Environment

50024

### Consultee

Title Mr  
First Name Lawrence  
Surname Weetman  
Position Chairman  
Organisation Chatteris Past, Present & Future

### Agent

Title  
Name  
Surname  
Position  
Organisation

50024-50

### 24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

We think that the local plan should encourage the retention of existing green spaces and natural green spaces - such as that at Wenny Meadow.

We would like to see enhanced protection of trees, in particular those with TPOs. Work by Chatteris Past, Present & Future found that half of trees in Chatteris supposedly covered by TPOs no longer exist. We would also like to see new protections for collections of trees in Chatteris, especially those currently covered by "group" TPOs which we have found to be vague and inadequate when it comes to trying to identify and protect them.

We would like to see Improved landscaping, green areas and tree provision in and around new developments, along with a programme of tree planting across the district. One way to help deliver this might be for the council to provide assistance to existing areas and projects, e.g, Little Acre Fen, when executing a programme of tree planting.

Chatteris Past, Present & Future tree project coverage: <https://www.cambstimes.co.uk/news/chatteris-trees-need-to-be-saved-says-a-newly-formed-society-1-431949> 5 Friends of Little Acre Fen: <https://www.facebook.com/Friends-of-Little-Acre-Fen-Pocket-Park-538396040003460/> Save Wenny Meadow campaign: <http://savewennyroadmeadow.org/>

50001

### Consultee

Title  
First Name Alan  
Surname Wheeldon  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50001-57

### 24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?

Trees should be planted at every opportunity. Any new roads should be made with large verges planted with trees. Each town should have a large park and should be in easy reach of a nature reserve. Linked walkways should be made that meander through housing developments for dogwalkers and cyclists to use to encourage a healthier lifestyle and facilitate wildlife.

## Question 24: Natural Environment

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50107

### Consultee

Title Mr  
First Name Ray  
Surname Whitwell  
Position  
Organisation

### Agent

Title  
Name  
Surname  
Position  
Organisation

50107-55

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

policies are needed for trees etc.

50047

### Consultee

Title  
First Name Geoff  
Surname Wilkinson  
Position  
Organisation Wisbech St Mary Parish Council

### Agent

Title  
Name  
Surname  
Position  
Organisation

50047-45

**24a) How do you think the Local Plan should protect and enhance biodiversity and the natural environment?**

More woodland and conservation areas.

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