Appeal by Mr Drew Price and Mr James Ball against the refusal by South Cambridgeshire District Council of a planning application for 'a material change of use of land through intensification to the stationing of caravans for residential purposes, nine dayrooms and the formation of hardstanding ancillary to that use."

Appeal Reference: APP/W0530/W/22/3308444

Proof of Evidence on Behalf of Mr Drew Price and Mr James Ball

Land to the South of Chear Fen Boat Club, Twentypence Road, Cottenham, Cambridgeshire, CB6 8PX

OS Grid Reference: TL 48154 71158

Planning Reference Number: 22/01703/FUL

1.1 Introduction

1.1.1 My name is Ben Crossthwaite. I hold an FdSc in Ecology and Conservation Management. I am a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and Director of Project Ecology. I have 10 years of applied ecological experience in both the private sector. I am an experienced botanist and protected species ecologist.

1.1.2 I will be presenting evidence relating to ecological and biodiversity considerations. The report(s) provided as evidence are appended below.

1.1.3 The evidence that I have prepared and provide for this appeal is true and has been prepared and is given in accordance with the guidance of my professional institution, irrespective of by whom I am instructed. I can confirm that the opinions are true and professional opinions.

1.2 Summary Findings

1.2.1 A site survey was undertaken on the 2nd December 2024.

Habitats and Biodiversity Net Gain

1.2.2 The survey of the application site, and land immediately adjacent to the site, were used to assist in establishing a baseline of the predevelopment habitats that were likely to have been present, as well as a previous ecological assessment of the site, conducted by RSK in June 2023, and historic imagery.

1.2.3 The assessment concluded the site pre-development consisted of the following habitats:

- Bare Ground
- Broadleaved Woodland
- Modified Grassland
- Mixed Scrub
- Tall Forbs
- Artificial Unvegetated, Unsealed Surface
- Line of Trees

1.2.4 It is judged, the development has resulted in impacts to broadleaved woodland, bare ground, modified grassland and tall forbs.

1.2.5 The broadleaved woodland is formally identified in the Cambridge City Council local Biodiversity Action Plan (BAP) as a target habitat. Furthermore, the woodland lost to the site works was formally recognised as priority habitat.

1.2.6 The remaining habitats impacted by the development are considered to have been ubiquitous and impacts are at site level only.

1.2.7 A biodiversity net gain assessment was undertaken based on the retrospective baseline. The baseline for the site is as follows:

- Habitat units are 10.25
- Hedgerow units are 0.6
- Watercourse units 1.6

1.2.8 The post-development biodiversity unit scores are as follows:

- Habitat units are 5.07
- Hedgerow units are 0.6
- Watercourse units 1.6

1.2.9 The net change in biodiversity units is considered to be as follows:

- Habitat units is -5.18 (-50.51%)
- Hedgerow units is – no change
- Watercourse units is – no change

1.2.10 I evaluate in the 'Impacts on Habitats' section of the report, that "the final baseline position of the site is, may be decided following discussions with the LPA and/or their ecological consultee". Unfortunately, the LPA did not consider or have comment on the ecological report put forward as evidence, therefore a Statement of Common Ground could not be achieved.

Fauna Species

Bats

1.2.11 The clearance works have resulted in the removal of an area of woodland.

1.2.12 Although this has undoubtedly reduced the quality of this linear landscape feature, it is unlikely to have a deleterious impact on foraging habitat in the locality, given the abundance in the vicinity of the site. The comprising trees may have hosted features for roosting bats. The likelihood of Potential Roost Features (PRF) to be present on trees generally increases the more mature the tree is.

1.2.13 In the balance of probability, it is unlikely a bat roost has been destroyed. However, direct impacts on roosting bats cannot be completely ruled out as a result of the loss of woodland.

Nesting Birds

1.2.14 The chance of the clearance works being undertaken during the bird nesting season cannot be ruled out. Therefore, clearance works may have resulted in direct impacts to nesting birds.

Amphibians

1.2.15 The pre-clearance, tall forb and woodland habitats on site provided suitable terrestrial habitat for amphibians.

1.2.16 The eutrophic ditch off-site provides poor breeding habitat for amphibians, particularly newt species, due to the lack of aquatic and marginal vegetation present.

1.2.17 The clearance work had the potential to result in direct impacts to amphibians.

Aquatic Mammals

1.2.18 The eutrophic ditch adjacent to the site provides poor habitat for both Water Vole and Otter.

1.2.19 The Great River Ouse provides more suitable habitat for both of these species. However, it is considered unlikely the site works have resulted in direct or indirect impacts to these aquatic mammal species considering the small, low impact nature of the works and distance between the 'construction zone' and river.

Hedgehog

1.2.20 The sites tall forb and woodland habitats lost to the site works, provided suitable habitat for Hedgehog.

1.2.21 Direct impacts to Hedgehog are unlikely but cannot be completely ruled out.

1.2.22 Given the retrospective nature of the ecological assessment, the baseline for the application site and potential impacts on protected species has put more onerous on professional judgement, likeliness of an impact occurring in the balance of probability, as opposed to scientific measures and results, giving a subjective nature to the conclusions.

Proposed Recommendations

1.2.23 As the clearance work included the loss of broadleaved woodland on site, that was/is a formally recognised priority habitat, it is recommended replacement planting is implemented on site.

1.2.24 Habitat mitigation is to be maximised on site to account for the loss of tall forbs, foraging and dispersal habitats for birds and small mammals.

1.2.25 The government implemented statutory BNG through a phased introduction, with major developments in scope from 12 February 2024, small developments in scope from 2 April 2024, and plans for 'nationally significant infrastructure projects' to be in scope by November 2025.

1.2.26 The South Cambridgeshire Local Plan , 2018, was adopted in September 2018. Chapter 6 of the plan relates to Protecting and Enhancing the Natural and Historic Environment, in which Policy NH/4 relates to biodiversity. Given the date the policy was adopted, there is no mention of BNG. However, does refer to the mitigation hierarchy.

1.2.27 The South Cambridgeshire District Council outlines their approach to biodiversity net gain, as the Local Planning Authority, in the Doubling Nature Strategy, 2021 document. In the Greater Cambridgeshire Shared Planning, Biodiversity Supplementary Planning Document, 2022 document also expresses the goals of development providing 20% net gain.

1.2.28 The site has been occupied prior to the aforementioned dates associated with the adoption of Statutory Biodiversity Net Gain. Local policy outlines aspirations for developments to provide 20% net gain, however, such policy has not been adopted. It is therefore considered the applicant is not to be subjected to the statutory 10% net gain requirements.

1.2.29 The post-development site plan does not mitigate for the losses of habitats on site, such as the woodland and tall forbs.

1.2.30 It is considered habitat mitigation is to be designed and agreed upon, following consultation with the LPA and or their ecological consultee.

1.2.31 It is recommended 3 bat boxes, and 3 bird boxes are installed on site on suitable retained trees.

1.2.32 It is recommended two amphibian hibernacula are created within the mixed scrub on site, and adjacent to the ditch.

Appendix – Report A

project ecology

Document Reference: PE.1777
Date:02/01/2025

LAND OFF TWENTY PENCE ROAD, WILBURTON

RETROSPECTIVE ECOLOGICAL APPRAISAL AND BIODIVERSITY NET GAIN ASSESSMENT

JANUARY 2, 2025

project ecology

project ecology

Document Reference: PE.1777
Date:02/01/2025

Document Title	Land of Twenty Pence Road, Wilburton
Prepared For	Green Planning Studio Ltd
Document Reference	PE.1777
Prepared By	Ben Crossthwaite
Revision	A
Date	02/01/2025

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Contents

1 Executive Summary

1.1.1 The site is the subject of a planning application for the "change of use of land through intensification to the stationing of caravans for residential purposes, nine dayrooms and the formation of hardstanding ancillary to that use" (planning reference 22/01703/FUL).

1.1.2 The site, located off Twenty Pence Road, Wilburton, has been partially cleared without planning consent, therefore a retrospective, ecological baseline has been assessed and reached.

1.1.3 The retrospective baseline habitats, pre-clearance, are judged to consist of broadleaved woodland, of which is formally identified as priority habitat, tall, forbs and bare earth.

1.1.4 The post-development site plan does not mitigate for the losses of habitats on site, such as the woodland and tall forbs.

1.1.5 It is considered habitat mitigation is to be designed and agreed upon, following consultation with the LPA and or their ecological consultee.

1.1.6 Mitigation measures for bats, nesting birds and amphibians are prescribed on site.

2 Introduction

2.1 Site Location

2.1.1 The site is located off Twenty Pence Road, Wilburton (OS grid reference TL 48154 71158).

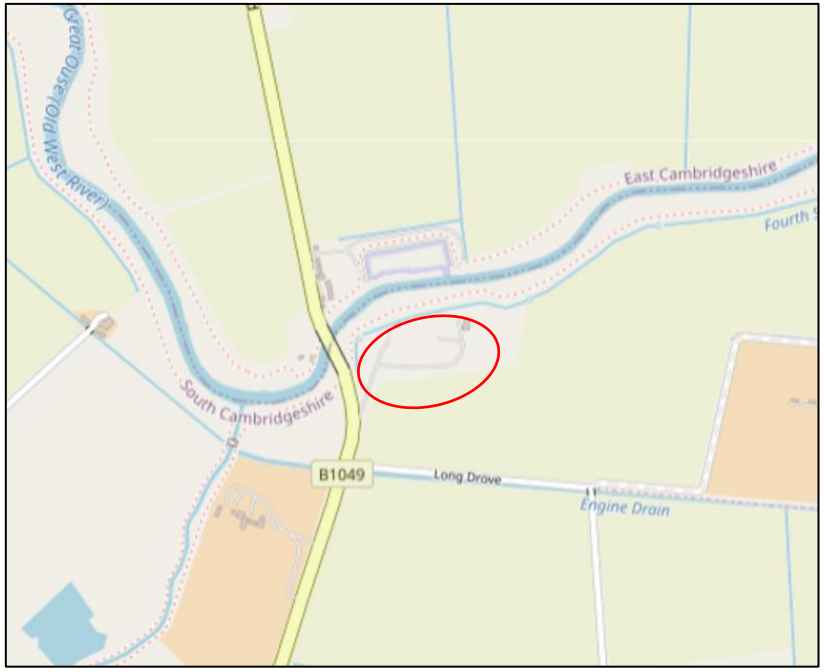


Figure 1: Site Location Courtesy of Open Steet Maps

2.2 Background

2.2.1 The site is the subject of a planning application for "change of use of land through intensification to the stationing of caravans for residential purposes, nine dayrooms and the formation of hardstanding ancillary to that use" (planning reference 22/01703/FUL).

2.2.2 The Landowner has cleared part of the site before planning consent has been granted, therefore a retrospective ecological baseline for the site is to be determined.

2.3 Scope of Work

2.3.1 Green Planning Studio Ltd commissioned Project Ecology to:

- Conduct a retrospective ecological appraisal for the application site.
- Conduct a retrospective BNG Assessment for the application site.

2.4 Aims and Objectives

2.4.1 Retrospectively assess the impacts of the site works/proposals on protected species and sites in the vicinity.

2.4.2 Retrospectively establish a habitat baseline for the habitats.

2.4.3 Calculate the retrospective baseline and post-development biodiversity units.

2.4.4 Provide mitigation to comply with current planning policy relating to Biodiversity Net Gain.

2.5 Site Visit

2.5.1 The survey was undertaken on 2nd December 2024 by Ben Crossthwaite *MCIEEM*. Ben has 9 years' professional experience of undertaking JNCC Phase 1 Habitat Surveys, UK Habitat Classification Surveys and protected species surveys across the UK.

2.5.2 Ben also holds a level 2 class survey licence for Bats (Reference 2020-48541-CLS-CLS)

2.5.3 The weather at the time of the survey was clear, cool and dry.

3 Survey Methodology

3.1 Desktop Survey

3.1.1 A desktop study was conducted using online resources to obtain information pertaining to any sites afforded statutory (e.g. SSSI) and non-statutory (e.g. LWS) designations within 2km of the site boundary. To do so, the 'Multi Agency Geographic Information for the Countryside (MAGIC – provided by Defra)' along with data from the 'Natural England Open Data Geoportal' was accessed to gather such information; this interactive mapping service was also used to locate any European Protected Species Mitigation Licenses (EPSML) and species records to further inform conclusions concerning protected species in the context of the study site and its proposed development.

3.1.2 Cambridgeshire and Peterborough Environmental Records Centre was contacted to provide details of non-statutory designated sites and records of protected and notable species within a 1km radius of the site.

3.2 Biodiversity Net Gain

3.2.1 During the site walkover, the ecological condition of each habitat was assessed in accordance with the Defra (2023) guidelines[1] and Guidelines for Preliminary Ecological Appraisal (CIEEM 2017[2]). The habitats on site were recorded and mapped during the field survey using the UK Habitat Classification system3.

3.2.2 The baseline habitat conditions have been informed from the habitat survey methodology described in section 3.3.

3.2.3 Habitat data including type, area (or length), condition and strategic location were uploaded to the Defra Statutory Biodiversity Metric Calculator spreadsheet to determine the baseline value of the site.

3.2.4 The post-development masterplan was interrogated to determine areas of hard standing, buildings, and associated infrastructure. New habitats were classified and allocated a target condition, based on habitat type, location and management input. This information was uploaded to the metric spreadsheet to obtain a post-development value.

3.2.5 The pre- and post-development values were compared to determine whether the yield of biodiversity units achieved a deficit or gain.

[1] Defra (2023) The Statutory Biodiversity Metric: User Guide (draft). November 2023.

[2] CIEEM 2017. Guidelines for Preliminary Ecological Appraisal.

[3] Butcher, B., Carey, P., et al. (2020). UK Habitat Classification – Habitat Definitions V1.1. at http://UKhab.org

3.3 Survey Limitations and Constraints

3.3.1 As this assessment is being undertaken retrospectively, a thorough characterisation of the sites baseline habitats and impacts on protected and notable species could not be undertaken. However, the site habitat survey provided data on neighbouring habitats that may provide an indication on habitats present pre-clearance.

3.3.2 The site visit was conducted during the sub-optimal time of year for botanical surveys. However, given the ubiquitous habitats present on site and the data from a recent survey conducted by RSK in June 2023[4], it is considered a robust characterisation of the current site habitats could be achieved. The site was fully accessible. There were no constraints to the survey of the site.

3.3.3 This baseline assessment has been assessed using professional judgement, resulting in a subjective verdict.

3.3.4 The baseline habitat conditions have been taken from historic aerial imagery, via various online sources, as well as the data obtained from the site surveys.

3.3.5 An informed assessment of the impacts on protected species is limited and has been assessed using professional judgement and the likelihood of a species being present on site and the likeliness of an impact occurring, in the balance of probability.

[4] *RSK – Biocensus, 2023. Chear Fen – Preliminary Ecological Appraisal Report.*

4 Results

4.1 Desktop Survey

4.1.1 The desk study results can be seen in Table 1 below.

Designation	Site Name	Distance From Site Boundary
County Wildlife Site (CWS)	River Great Ouse	Adjacent to the sites northern boundary
CWS	Beach Ditch and Engine Drain	0.18km south
CWS	Twenty Pence Pit	0.77km southwest

Table 1 showing all the designated sites within 2km of the site boundary

4.1.2 The desk study identified that the site is located within the Impact Risk Zone of Upware South Pit SSSI, Upware North Pit SSSI and Cam Washes SSSI. The proposed works will not require the Local Planning Authority to consult with Natural England.

4.2 Habitat Survey

4.2.1 The habitat maps are in Appendix B. Target notes and photographs are contained in Appendix C. Species lists for each habitat can be seen in Appendix D. An extract of the data search can be found in Appendix E.

Bare Ground

4.2.2 The site appears to have areas of disturbed ground across the central areas of the site, resulting in what is predicted to be areas of unvegetated bare earth.

Other Broadleaved Woodland

4.2.3 The aerial images indicate an area of woodland located in the western part of the site, adjacent to the offsite ditch.

4.2.4 The area of woodland is dissected by an access track, with the area of broadleaved woodland to the south still present at the time of the site survey.

4.2.5 The woodland appears to be of a similar age, and the baseline assessment for the broadleaved woodland has been heavily informed by the retained part of the woodland.

4.2.6 The woodland comprises trees of a similar age, resulting in a dominant canopy layer with intermittent shrub layer present and little evidence of a field layer, largely due the shading out of the canopy.

Modified Grassland

4.2.7 A small area of grassland is located ibn the western part of the site. The grassland appears to be unmanaged and dominated by species commonly associated with eutrophic soils, such as Broadleaved Dock *Rumex obtusifolius* and Common Nettle *Urtica dioica*.

Mixed Scrub

4.2.8 An area of mixed scrub appears to be located along the eastern peripheries of the site, similar to that which is currently present on site.

4.2.9 This habitat lacks management, and the baseline has been heavily informed by the data taken during the site visit.

Tall Forbs

4.2.10 Areas around the peripheries of the bare ground appear much greener in colour suggesting the presence of vegetation. Given the heavy disturbance levels across much of the central area of the site, it has been estimated that these greener areas are likely to have consisted tall forbs species.

4.2.11 A more ephemeral or short perennial vegetation may also have been present on the fringes of the tall forbs and bare ground habitats.

Artificial Unvegetated, Unsealed Surface

4.2.12 The access track off Twenty Pence Road, extending into the site is assessed as consisting a compact crush-and-run, permeable, unvegetated surface. This remains, albeit, likely resurfaced.

Line of Trees

4.2.13 A line of trees runs parallel to the ditch on site, These are largely early-mature in age and provide some habitats suitable various fauns species.

Ditch

4.2.14 A ditch runs parallel to the northern boundary of the site, continuing further east and westwards off-site. The channel is dominated by leaflitter. The water is clear with no discernible flow. No aquatic or marginal vegetation was present, with the bank face and top largely comprising competitive ruderal species. The water appears eutrophic.

Priority Habitats

4.2.15 The desk study returned many records of priority habitat within the study area.

4.2.16 The area of broadleaved woodland existing on site and the section lost to the site works is categorised as priority habitat with a unique reference of PHID54807531_027116621.

4.2.17 The Great River Ouse CWS, located a short distance from the sites northern boundary is categorised as Priority Habitat, with references of PHID54876489_027145543 (Coastal and floodplain grazing marsh) and PHID54803016_027132331 (Good quality semi-improved grassland).

4.3 Biodiversity Net Gain

4.3.1 The results of the Biodiversity Net Gain Assessment should be read in conjunction with the Statutory Metric Condition Assessment and Calculation Tool documents[5].

4.3.2 A summary of the retrospective baseline unit scores for the habitats on site can be seen in Table 1.

Habitat	Size/Length	Unit Type (Habitat, Hedgerow, River)	Condition	Unit Total
Bare Ground	1.3103ha	Habitat	Poor	2.62
Broadleaved Woodland	0.1901ha	Habitat	Moderate	1.52
Modified Grassland	0.0017ha	Habitat	Moderate	0.01
Mixed Scrub	0.0853ha	Habitat	Moderate	0.68
Tall Forbs	1.3547ha	Habitat	Moderate	5.42
Artificial Unvegetated, Unsealed Surface	0.1707ha	Habitat	N/A	Zero
			Total	10.25
Line of trees	0.3km	Hedgerow	Poor	0.6
			Total	0.6
Ditch	0.3994km	Watercourse	Poor	1.6
			Total	1.6

Table 1 showing the retrospective baseline unit totals for each unit/habitat type on site

4.4 Bats

4.4.1 The data search returned 1 record of bats within the study area. This is of '26 passes' of an unrecorded bat species, dated 1991.

4.4.2 The nearest record of a granted European Protected Species Licence for Bats is located 0.85km north of the site. The record is of a Common Pipistrelle and Brown Long-eared 'resting place' dated 2013-2015 (EPSM2013-6399)[6].

4.4.3 The sites peripheral line of trees, woodland, scrub and neighbouring river habitats provide potential foraging and commuting opportunities for bats and the cleared woodland may have provided potential roosting features for bats.

[5] *Both documents will be provided separately.*

[6] *Magic Maps - Granted European Protected Species Applications (England)*

4.5 Badger

4.5.1 The data search returned 2 records of Badge *Meles meles* within the study area. These were of roadkill and a sett dated 1991.

4.5.2 No evidence of Badger was located on site, or within 20 metres of the site's boundaries.

4.5.3 The sites scrub, woodland, line of trees and grassland habitats provide cover and foraging habitat for Badger *Meles meles*. However, the arable farmland in the vicinity of the site provides more favourable foraging habitat for Badgers. Impacts to Badger are considered unlikely and Badger are not considered further in this report.

4.6 Nesting Bird

4.6.1 The data search returned 93 records of bird species within the study area. None of the records are located within the site boundary.

4.6.2 The trees, woodland and scrub habitats provided suitable nesting habitat for passerine bird species, as well has foraging opportunities. No evidence of nesting birds was found during the site survey.

4.6.3 The site does not provide suitable habitat for ground-nesting or over-wintering birds. Furthermore, no sightings or evidence of ground nesting or over-wintering birds were recorded during the site survey. The presence of horses, cover for terrestrial predators and perches for raptor species on site is likely to reduce the possibility further. Therefore, ground nesting and over-wintering birds are not considered further in this report.

4.7 Amphibians

4.7.1 The data search returned zero records of amphibian species.

4.7.2 The standing water within the ditch adjacent to the site provides potential breeding habitat.

4.7.3 The sites largely managed habitats provide sub-optimal foraging, dispersal, and cover opportunities for amphibians. However, the woodland, tall forb and scrub habitat are favourable habitats.

4.7.4 The nearest record of Great Crested Newt *Triturus cristatus* is a licence application indicating presence located 4.5km south of the site boundary, dated 2019. This application has case reference of 2019-40817-EPS-AD2.

4.7.5 The site lies within a Green Risk Zone for Great Created Newt which indicates moderate habitat and Great Crested Newt may be present.

4.8 Aquatic Mammals

4.8.1 The data search returned 1 record of Otter *Lutra lutra* and 10 records of Water Vole *Arvicola amphibius* in the study area, dated between 1991-1992.

4.8.2 The ditch adjacent to the northern boundary is considered poor habitat for Water Vole and Otter. However, the adjacent River Great Ouse provides foraging, burrow and holt opportunities for these species.

4.8.3 No evidence of Water Vole or Otter were recorded during the site survey.

4.9 Reptile

4.9.1 The data search returned zero records of reptile species in the study area.

4.9.2 The site provides suboptimal habitat for reptiles. The site is regularly disturbed by human and equestrian activity and does not provide suitable basking sites for reptiles.

4.9.3 No sightings or evidence of any reptile species was recorded during the site survey. Impacts to reptiles are considered unlikely and are not considered further in this report.

4.10 Hedgehog

4.10.1 The data search returned zero records of Hedgehog *Erinaceus europaeus* within the study area.

4.10.2 The presence/impacts of Hedgehog *Erinaceus europaeus* cannot be discounted as the site provided suitable foraging habitat.

4.11 Invasive Species

4.11.1 No records of invasive, non-native species were returned within the study area. Furthermore, no such species were recorded during the site survey.

5 Evaluation

5.1 Development Context

5.1.1 As specified above, some of the site habitats have been cleared without planning consent.

5.2 Impacts on Designated Sites

5.2.1 The River Great Ouse CWS is located approximately 25m from the northern site boundary.. Therefore, direct impacts are unlikely, particularly considering the relative small-scale and low impact nature of the site works.

5.2.2 The Sustainable Drainage System (soakaway) utilised on site does not result in outflows to the River Great Ouse. Therefore, no indirect impacts to the CWS are anticipated.

5.3 Impacts on Habitats

5.3.1 The assessment of the baseline habitats has been challenging given the retrospective nature and limited photographic evidence of the site pre-clearance.

5.3.2 However, the site survey provided valuable data to help assist in the characterisation of the baseline habitats, and it is considered the habitats have been identified as accurately as possible given the retrospective nature. This includes conjecture regarding the tall forbs and broadleaved woodland. This is of course subjective, and the decision on what the final baseline position of the site is, may be decided following discussions with the LPA and/or their ecological consultee.

Bare Ground

5.3.3 The site appears to have had an area of high disturbance within the centre of the site, resulting in exposed earth, likely establishing ephemeral and short perennial species present.

5.3.4 This habitat would have provided limited ecological value and Impacts to this habitat are at site level only.

Broadleaved Woodland

5.3.5 The site works appear to have resulted in the loss of an area of broadleaved woodland.

5.3.6 This habitat is formally identified in the Cambridge City Council local Biodiversity Action Plan (BAP) as a target habitat. Furthermore, the woodland lost to the site works was formally recognised as priority habitat.

5.3.7 The broadleaved woodland is the habitat of most ecological value that has been lost as a result of the site works. The impacts are at local level.

Modified Grassland

5.3.8 This habitat is considered to be of low-moderate ecological value. The grassland is likely to have provided a source of pollen and nectar for invertebrates and foraging habitat for small mammals and amphibians. Impacts to this habitat are at site level only.

Tall Forbs

5.3.9 The tall forbs that dominated the 'construction zone' is considered to be of low-moderate ecological value. This habitat is likely to have provided a source of pollen and nectar for invertebrates and foraging habitat for small mammals and amphibians. Impacts to this habitat are at site level only.

Priority Habitat

5.3.10 The area of on site, broadleaved woodland, identified as priority habitat has been lost. The impact is at local level.

5.4 Biodiversity Net Gain

5.4.1 The pre and post-development site maps can be seen in Appendix B.

5.4.2 The evaluation of the Biodiversity Net Gain Assessment should be read in conjunction with the Statutory Condition Assessment and Metric Calculation Tool documents.

5.4.3 Within the application site the baseline unit values are as follows:

- Habitat units are 10.25
- Hedgerow units are 0.6
- Watercourse units 1.6

5.4.4 The post-development calculations for each unit category are summarised in Table 2.

Habitat	Area/Length	Condition	Unit Total
Habitat Units			
Broadleaved Woodland - retained	0.0491ha	Moderate	0.39
Mixed Scrub - retained	0.0853ha	Moderate	0.68
Sealed Surfaces - Buildings	0.1503ha	N/A	Zero
Sustainable Drainage System	0.0408ha	Moderate	0.1
Artificial Unvegetated, Unsealed Surface	0.7672ha	N/A	Zero
Vegetated Garden	2.0164ha	N/A	3.89
Modified Grassland	0.0037ha	Moderate	0.01
		Total	5.07
Hedgerow Units			
Line of Trees - retained	0.3km	Poor	0.6
		Total	0.6
Watercourse Units			
Ditch - retained	0.3994km	Poor	1.6
		Total	1.6

Table 2 showing a summary of post-development biodiversity net gain calculations

Sealed Surface - Building

5.4.5 This consists of the caravan and day rooms on site.

Sustainable Drainage System

5.4.6 This comprises the soakaway area located in the western part of the site.

Unsealed Surface

5.4.7 This habitat comprises the area of permeable hardstanding access road and parking areas which have been created on site.

Vegetated Garden

5.4.8 This comprises the areas of private garden space allotted to each caravan plot.

Modified Grassland

5.4.9 This consists of a small parcel of modified grassland in the western part of the site.

5.4.10 The net change in biodiversity units is considered to be as follows:

- Habitat units is -5.18 (-50.51%).
- Hedgerow units is – no change
- Watercourse units is – no change

5.4.11 An extract of the headline results, from the Statutory Defra Metric Calculation Tool, can be seen in Appendix F.

5.4.12 The trading rules have not been satisfied within the metric calculation, due to the loss of habitats of medium distinctiveness being replaced with habitats of low or very low ecological distinctiveness.

5.5 Mitigation Hierarchy

5.5.1 The mitigation hierarchy is a widely used tool that guides users towards limiting as far as possible the negative impacts on biodiversity from development projects.

5.5.2 The mitigation hierarchy steps are as follows:

- Avoid - Project proposals must give the highest priority to 'avoidance' strategies in accordance with the mitigation hierarchy.
- Minimise - Where avoidance is not feasible, it is essential to minimise negative impact by modifying the project design/strategy. All sensitive habitats must be avoided at all costs.
- Mitigate - All non-avoidable ecological damage must be compensated.
- Offset - Final resort after all options have been exhausted: the most expensive, complex, and high-risk approach.

5.5.3 As the ecological impact assessment has been carried out retrospectively, it is a fair assumption that the mitigation hierarchy has not been considered.

5.5.4 The government implemented statutory BNG through a phased introduction, with major developments in scope from 12 February 2024, small developments in scope from 2 April 2024, and plans for 'nationally significant infrastructure projects' to be in scope by November 2025.

5.5.5 The South Cambridgeshire Local Plan[7], 2018, was adopted in September 2018. Chapter 6 of the plan relates to Protecting and Enhancing the Natural and Historic Environment, in which Policy NH/4 relates to biodiversity. Given the date the policy was adopted, there is no mention of BNG. However, does refer to the mitigation hierarchy:
Policy NH/4, Point 2 – "New development must aim to maintain, enhance, restore or add to biodiversity. Opportunities should be taken to achieve positive gain through the form and design of development. Measures may include creating, enhancing and managing wildlife habitats and networks, and natural landscape. The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation. Priority for habitat creation should be given to sites which assist in the achievement of targets in the Biodiversity Action Plans (BAPs) and aid delivery of the Cambridgeshire Green Infrastructure Strategy".

5.5.6 The South Cambridgeshire District Council outlines their approach to biodiversity net gain, as the Local Planning Authority, in the Doubling Nature Strategy[8], 2021 document in which the following statement was made:
"*We will make the most of our direct influence on the natural environment as the local planning authority. We aspire to achieve 20% biodiversity net gain through development. We cannot require this unless and until it is adopted in planning policy or mandated at national level but will encourage all partners to work with us to achieve this aspiration ahead of policy and legal obligations".*

5.5.7 In the Greater Cambridgeshire Shared Planning, Biodiversity Supplementary Planning Document, 2022[9] document also expresses the goals of development providing 20% net gain:
"Environmental Principles seek to set ambitious goals, including the desire to realise Biodiversity Net Gain (BNG) at 20% for all development types within the Arc. This approach is further supported in more local initiatives like South Cambridgeshire's Doubling Nature Strategy and Cambridge City's upcoming Biodiversity Strategy. Together, these documents set the tone for greater aspiration and more robust biodiversity policies in the emerging Greater Cambridge Local Plan".

5.5.8 The site has been occupied prior to the aforementioned dates associated with the adoption of Statutory Biodiversity Net Gain.

5.5.9 Local policy outlines aspirations for developments to provide 20% net gain, however, such policy has not been adopted.

5.5.10 It is therefore considered the applicant is not to be subjected to the statutory 10% net gain requirements.

5.5.11 Mitigation requirements are likely to be agreed upon following consultation with the LPA and or their ecological consultee.

[7] *South Cambridgeshire District Council, 2018. South Cambridgeshire Local Plan.*
[8] *South Cambridgeshire District Council (SCDD), 2021. Doubling Nature Strategy*
[9] *Greater Cambridgeshire Shared Planning, 2022. Biodiversity Supplementary Planning Document*

5.6 Impacts on Species

Bats

5.6.1 The trees, woodland and scrub habitats provide/provided suitable bat foraging and commuting habitat.

5.6.2 The clearance works have resulted in the removal of an area of woodland. Although this has undoubtedly reduced the quality of this linear landscape feature, it is unlikely to have a deleterious impact on foraging habitat in the locality, given the abundance in the vicinity of the site.

5.6.3 The comprising trees may have hosted features for roosting bats. The likelihood of Potential Roost Features (PRF) to be present on trees generally increases the more mature the tree is.

5.6.4 In the balance of probability, in the absence of mitigation, it is unlikely a bat roost has been destroyed. However, direct impacts on roosting bats cannot be completely ruled out as a result of the loss of woodland. It is recommended bat mitigation is provided on site.

Nesting Birds

5.6.5 The woodland on site would have provided suitable nesting habitat for passerine birds. The loss of the woodland habitat has reduced the sites provision for bird nesting habitat.

5.6.6 The chance of the clearance works being undertaken during the bird nesting season cannot be ruled out. Therefore, in the absence of mitigation, clearance works may have resulted in direct impacts to nesting birds.

5.6.7 Nesting bird mitigation is to be implemented on site.

Amphibians

5.6.8 The pre-clearance, tall forb and woodland habitats on site provided suitable terrestrial habitat for amphibians.

5.6.9 The eutrophic ditch off-site provides poor breeding habitat for amphibians, particularly newt species, due to the lack of aquatic and marginal vegetation present.

5.6.10 In the absence of mitigation, the clearance work had the potential to result in direct impacts to amphibians.

5.6.11 Amphibian mitigation is to be provided on site in the form of brash piles.

Aquatic Mammals

5.6.12 The eutrophic ditch off-site provides poor habitat for both Water Vole and Otter.

5.6.13 The Great River Ouse provides more suitable habitat for both of these species. However, in the absence of mitigation, it is considered unlikely the site works have resulted in direct or indirect impacts to these aquatic mammal species considering the small, low impact nature of the works and distance between the 'construction zone' and river.

Hedgehog

5.6.14 The sites tall forb and woodland habitats lost to the site works, provided suitable habitat for Hedgehog.

5.6.15 In the absence of mitigation, direct impacts to Hedgehog are unlikely, but cannot be completely ruled out.

6 Conclusion and Recommendations

6.1 Further Survey Work

6.1.1 Due to the retrospective nature of this assessment and report, further survey work is not possible or required.

6.2 Mitigation and Enhancement Measures

Habitat

6.2.1 As the clearance work included the loss of broadleaved woodland on site, that was/is a formally recognised priority habitat, it is recommended replacement planting is implemented on site.

6.2.2 Habitat mitigation is to be maximised on site to account for the loss of tall forbs, foraging and dispersal habitats for birds and small mammals.

Biodiversity Net Gain

6.2.3 The post-development site plan does not mitigate for the losses of habitats on site, such as the woodland and tall forbs.

6.2.4 It is considered habitat mitigation is to be designed and agreed upon, following consultation with the LPA and or their ecological consultee.

Bats and Birds

6.2.5 It is recommended 3 bat boxes and 3 bird boxes are installed on site on suitable retained trees. This could be dealt with via a suitably worded condition.

Amphibians

6.2.6 It is recommended two amphibian hibernacula are created within the mixed scrub on site, and adjacent to the ditch. This could be dealt with via a suitably worded condition.

7 Appendix A: Planning Policy and Legislation

National Policy

The National Planning Policy Framework (NPPF 2024) describes the Government's planning policy for England and how it should be applied. Within this framework, the requirements in relation to biodiversity are included within several policies. The two most relevant to individual planning decisions are Paragraphs 187 and 193, shown below:

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

a. 193. When determining planning applications, local planning authorities should apply the following principles:

if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only

exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons70 and a suitable compensation strategy exists; and

- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Legislation

The Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000) includes the notification and confirmation of Sites of Special Scientific Interest (SSSIs). SSSIs can be notified for their floral, faunal, geological, or physiographical features. Protection against damaging operations and management of SSSIs is also included within the Act. Impact Risk Zones (IRZs) are zones around an SSSI account for the particular sensitivities of the features for which it is notified and identify development proposal which could have adverse impacts.

The Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000) protects native animals, plants and habitats. Under the Act it is an offence to intentionally kill, injure or take any wild animal listed on Schedule 5 and it is an offence to interfere with places used for shelter or protection, or intentionally disturb animals occupying such places. The Act prohibits picking, uprooting or destroy any wild plant (or any attached seed or spore) listed in Schedule 8.

European Protected Species (EPS) such as bats, Hazel Dormouse, Otter, Natterjack Toad, Smooth Snake, Sand Lizard and Great Crested Newt are protected by the Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000) and the Conservation of Habitats and Species Regulations 2017. The Acts make it an offence to:

a) Deliberately capture, injure or kill an EPS;

b) Deliberately impair an EPS's ability to survive, breed, reproduce, rear or nurture young; to hibernate or migrate; or significantly affect the local distribution or abundance of the EPS.

c) Possess or control live or dead EPS or any part of, or anything derived from a EPS;

d) Damage or destroy a breeding site or resting place of an EPS;

e) Intentionally or recklessly obstruct access to any place that is used for shelter or protection by an EPS;

f) Intentionally or recklessly disturb a structure or place that it uses for shelter or protection that is occupied by an EPS.

All common herptiles are protected under the Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000). Grass Snake, Slow Worm, Common Lizard, Adder are protected against intentional killing or injury. Common Frog, Common Toad, Smooth Newt and Palmate Newt is protected against sale. In addition, all British reptiles, Common toad and Great Crested Newt are listed as Species of Principal Importance.

All nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally kill, injure or take any wild bird or take, damage, or destroy its nest whilst in use or being built, or take or destroy its eggs. It is an offence to intentionally or recklessly disturb a species listed on Schedule 1 of the Act while they are nest building or at or near a nest with eggs or young, or to disturb the dependent young.

The Protection of Badgers Act 1992 makes it an offence to wilfully, or to attempt to kill, injure, take, possess or cruelly ill-treat a Badger, or intentionally or recklessly interfere with a sett. Interference of a sett includes disturbing badgers during occupation of a sett, or damaging or destroying a sett, or obstructing access to the sett.

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 places a duty on every public authority to have regard to conserving biodiversity. Section 41 of the same Act requires the Secretary of State to publish a list of the living organisms and types of habitats that are of 'Principal Importance' for the purpose of conserving biodiversity. The Secretary of State must take steps, as appear reasonably practicable, to further the conservation of those living organisms and habitats in any list published under this section. The list of species and habitats of principal importance currently includes 943 species and 56 habitats. These are the species and habitats found in England which are regarded as conservation priorities under the UK Post-2010 Biodiversity Framework

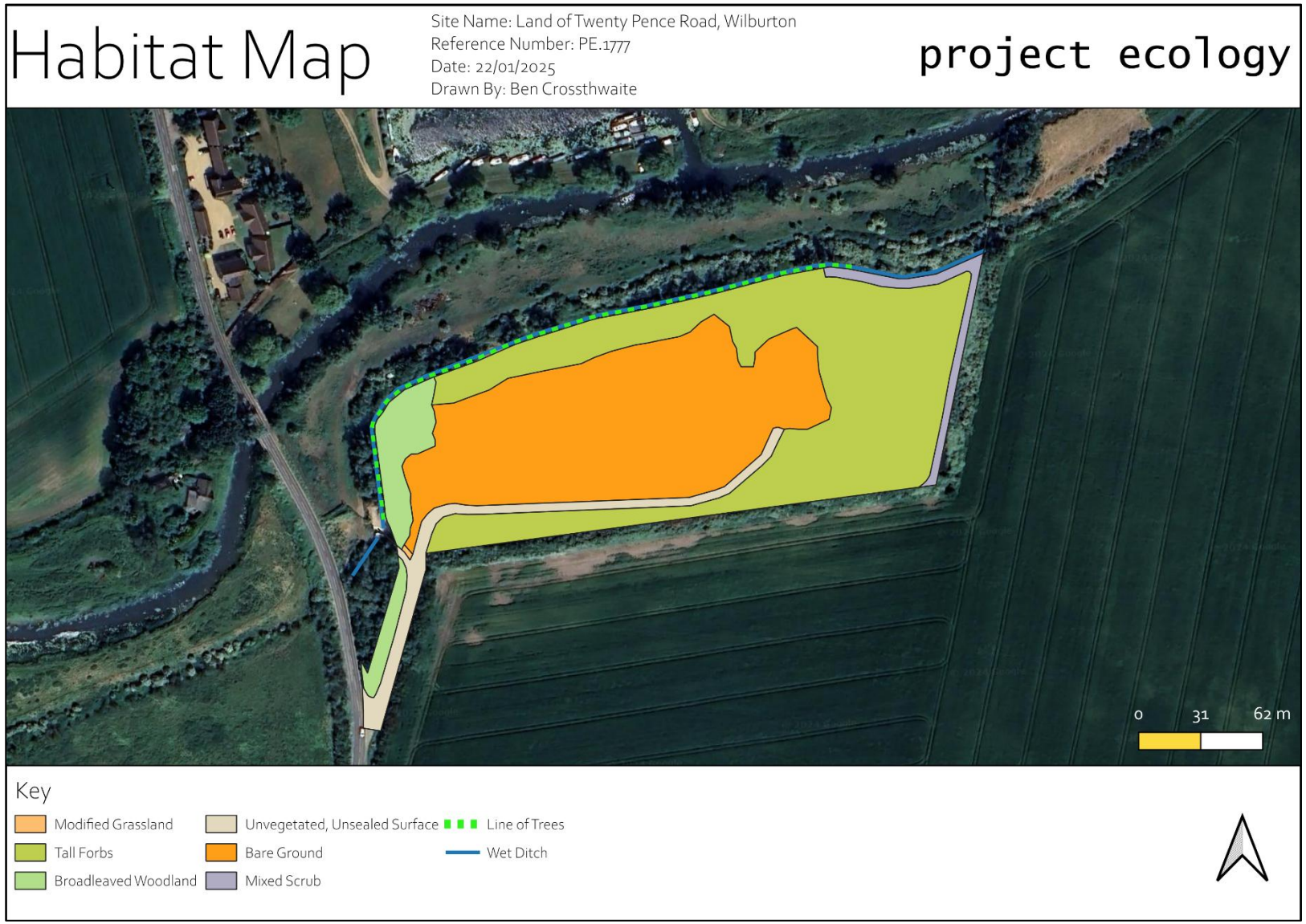
The Hedgerows Regulations 1997 protect 'important' hedgerows from destruction or damage. A hedgerow is 'important' if it (a) has existed for 30 years or more; and (b) satisfies at least one of the criteria listed in Part II of Schedule 1 of the Regulations. Under the Regulations, it is against the law to remove or destroy 'important' hedgerows unless permitted by the local planning authority.

The Environment Bill 2021 makes it mandatory for housing and development, subject to some narrow exemptions, to achieve at least a 10% net gain in value for biodiversity – a requirement that habitats for wildlife must be left in a measurably better state than before the development. Developers must submit a 'biodiversity gain plan' alongside usual planning application documents. The local authority must assess whether the 10% net gain requirement is met in order to approve the biodiversity gain plan.

The Environment Bill 2021 strengthens the duty on public authorities (NERC Act, 2006) to have regard to the conservation of biodiversity.

The Environment Bill 2021 amends the Wildlife and Countryside Act 1981 to introduce an additional purpose for granting a protected species licence in relation to development, 'for reasons of overriding public interest', and two additional tests for the granting of such licences: that there is 'no other satisfactory solution' and that granting the licence is 'not detrimental to the survival of any the population of the species concerned'. These changes will reduce the scope for unlicensed activities to provide clear safeguards before licences can be granted, providing legal certainty and clarity to developers about their environmental obligations.

8 Appendix B: Retrospective Baseline Habitat Map



Appendix B: Post-development Habitat Map

Habitat Map

Site Name: Land of Twenty Pence Road, Wilburton
Reference Number: PE.1777
Date: 22/01/2025
Drawn By: Ben Crossthwaite

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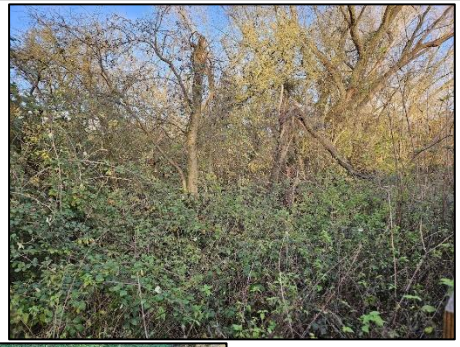
Key

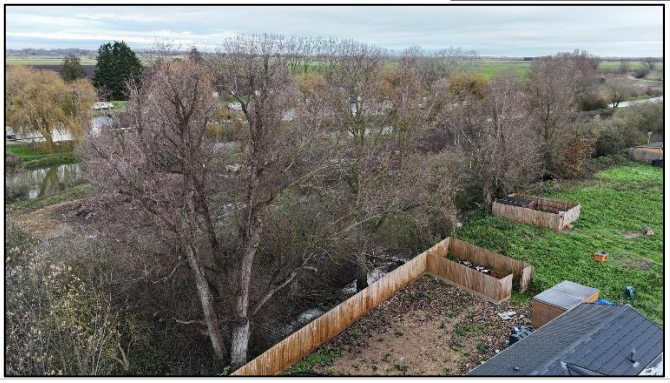
- Vegetated Garden
- Sealed Surface - Building
- Modified Grassland
- Broadleaved Woodland
- Unvegetated, Unsealed Surface
- Mixed Scrub
- Sustainable Drainage System
- Line of Trees
- Wet Ditch

9 Appendix C: Target Notes and Photographs

Target Notes		
Reference No.	Habitat/Feature/Species	Photograph
	Retrospective site image dated 05/2020	
	Artificial Unvegetated, Unsealed Surface	 

	Broadleaved Woodland	   
	Modified Grassland	

	Vegetated Garden	
	Tall Forbs	
	Mixed Scrub	
	Sustainable Drainage System	

		
	Line of Trees	  

	Wet Ditch	 
	River Great Ouse	 

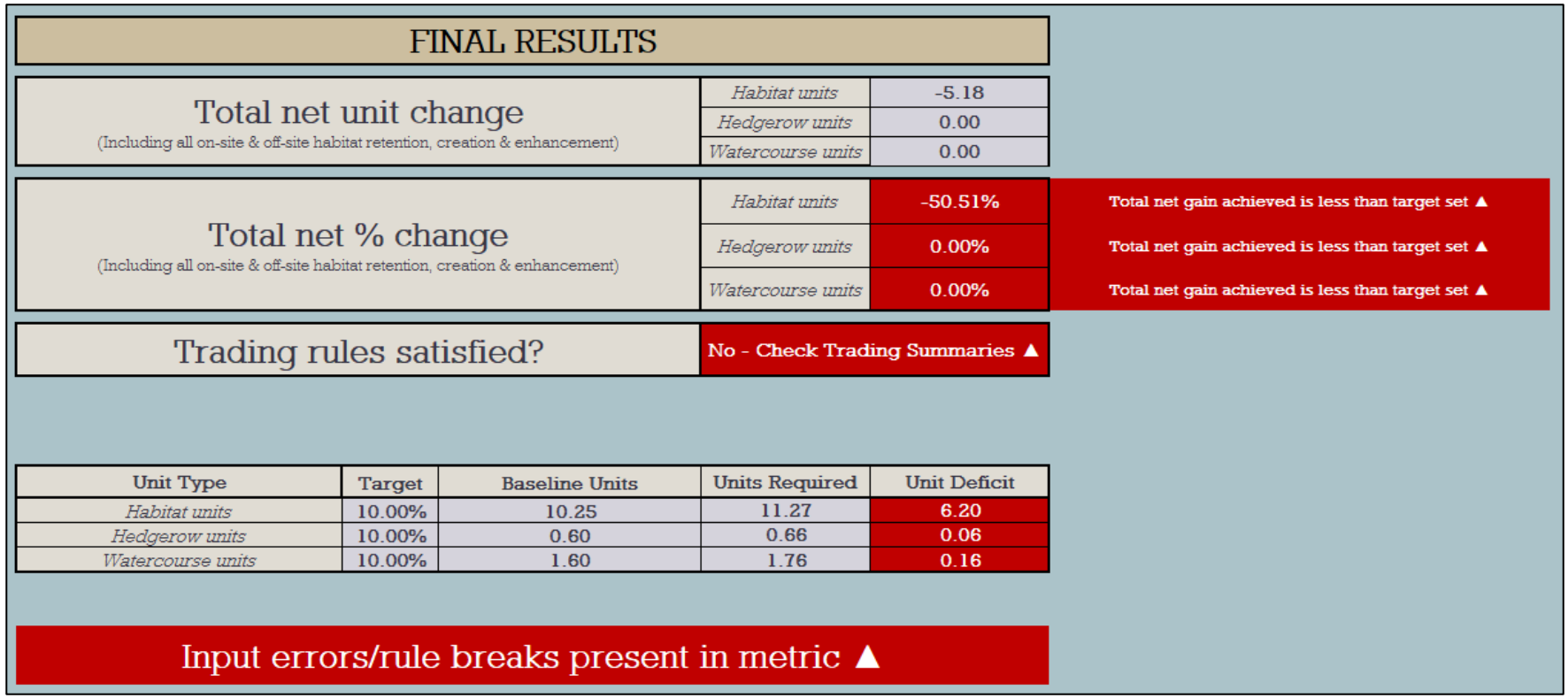
10 Appendix D: Species Lists

Species List		
Common Name	Latin Name	Abundance (or Notes)
Please see the PEA report by RSK for species		

11 Appendix E: Data Search Extract

The results of the data search can be provided on request

12 Appendix F: Calculation Tool, Headline Results Extract



FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-5.18	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-50.51%	Total net gain achieved is less than target set ▲
	Hedgerow units	0.00%	Total net gain achieved is less than target set ▲
	Watercourse units	0.00%	Total net gain achieved is less than target set ▲
Trading rules satisfied?		No - Check Trading Summaries ▲	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	10.25	11.27	6.20
Hedgerow units	10.00%	0.60	0.66	0.06
Watercourse units	10.00%	1.60	1.76	0.16

Input errors/rule breaks present in metric ▲

Appendix – Report B

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LAND OFF TWENTY PENCE ROAD, WILBURTON

RETROSPECTIVE ECOLOGICAL APPRAISAL AND BIODIVERSITY NET GAIN ASSESSMENT

JANUARY 2, 2025

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Document Reference: PE.1777
Date:02/01/2025

Document Title	Land of Twenty Pence Road, Wilburton
Prepared For	Green Planning Studio Ltd
Document Reference	PE.1777
Prepared By	Ben Crossthwaite
Revision	
Date	02/01/2025

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Contents

13 Executive Summary

13.1.1 The site is the subject of a planning application for the "change of use of land through intensification to the stationing of caravans for residential purposes, nine dayrooms and the formation of hardstanding ancillary to that use" (planning reference 22/01703/FUL).

13.1.2 The site, located off Twenty Pence Road, Wilburton, has been partially cleared without planning consent, therefore a retrospective, ecological baseline has been provided.

13.1.3 The retrospective baseline habitats, pre-clearance, are judged to consist of broadleaved woodland, of which is formally identified as priority habitat, tall, forbs and bare earth.

13.1.4 The site is predicted to result in a net loss of biodiversity units, largely due to the loss of the tall forbs and woodland. The client will have to pursue offsetting options to mitigate for 7.42 habitat units, 0.06 hedgerow units and 0.16 watercourse units needed to reach 10% net gain.

13.1.5 Mitigation measures for bats, nesting birds and amphibians are prescribed on site.

14 Introduction

14.1 Site Location

14.1.1 The site is located off Twenty Pence Road, Wilburton (OS grid reference TL 48154 71158).

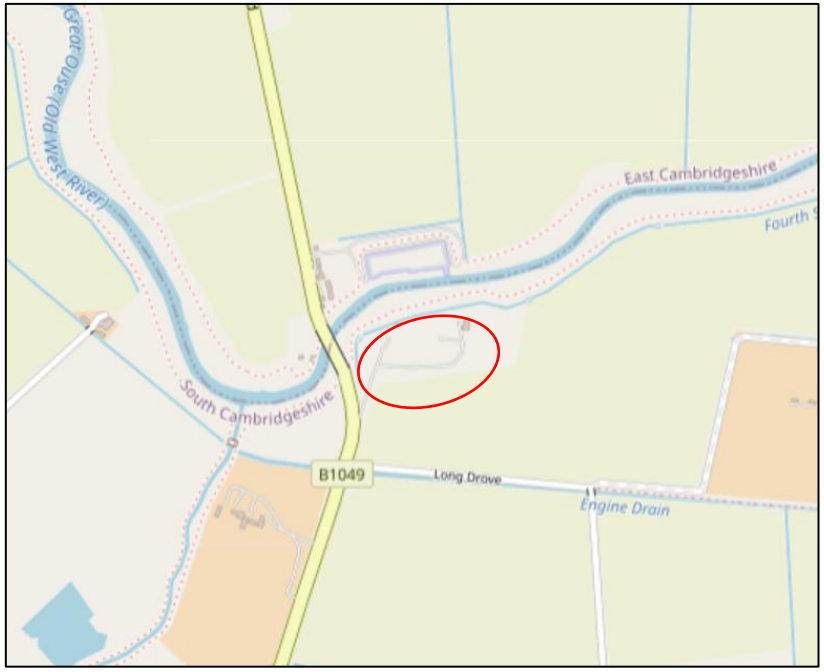


Figure 2: Site Location Courtesy of Open Steet Maps

14.2 Background

14.2.1 The site is the subject of a planning application for "change of use of land through intensification to the stationing of caravans for residential purposes, nine dayrooms and the formation of hardstanding ancillary to that use" (planning reference 22/01703/FUL).

14.2.2 The Landowner has cleared part of the site before planning consent has been granted, therefore an ecological baseline for the site is to be determined.

14.3 Scope of Work

14.3.1 Green Planning Studio Ltd commissioned Project Ecology to:

- Conduct a retrospective ecological appraisal for the application site.
- Conduct a retrospective BNG Assessment for the application site.

14.4 Aims and Objectives

14.4.1 Retrospectively assess the impacts of the site works/proposals on protected species and sites in the vicinity.

14.4.2 Retrospectively establish a habitat baseline for the habitat.

14.4.3 Calculate the retrospective baseline and post-development biodiversity units.

14.4.4 Provide mitigation to comply with current planning policy relating to Biodiversity Net Gain.

14.5 Site Visit

14.5.1 The survey was undertaken on 2nd December 2024 by Ben Crossthwaite *MCIEEM*. Ben has 9 years' professional experience of undertaking JNCC Phase 1 Habitat Surveys, UK Habitat Classification Surveys and protected species surveys across the UK.

14.5.2 Ben also holds a level 2 class survey licence for Bats (Reference 2020-48541-CLS-CLS)

14.5.3 The weather at the time of the survey was clear, cool and dry.

15 Survey Methodology

15.1 Desktop Survey

15.1.1 A desktop study was conducted using online resources to obtain information pertaining to any sites afforded statutory (e.g. SSSI) and non-statutory (e.g. LWS) designations within 2km of the site boundary. To do so, the 'Multi Agency Geographic Information for the Countryside (MAGIC – provided by Defra)' along with data from the 'Natural England Open Data Geoportal' was accessed to gather such information; this interactive mapping service was also used to locate any European Protected Species Mitigation Licenses (EPSML) and species records to further inform conclusions concerning protected species in the context of the study site and its proposed development.

15.1.2 Cambridgeshire and Peterborough Environmental Records Centre was contacted to provide details of non-statutory designated sites and records of protected and notable species within a 1km radius of the site.

15.2 Biodiversity Net Gain

15.2.1 During the site walkover, the ecological condition of each habitat was assessed in accordance with the Defra (2023) guidelines[10] and Guidelines for Preliminary Ecological Appraisal (CIEEM 2017[11]). The habitats on site were recorded and mapped during the field survey using the UK Habitat Classification system12.

15.2.2 The baseline habitat conditions have been informed from the habitat survey methodology described in section 3.3.

15.2.3 Habitat data including type, area (or length), condition and strategic location were uploaded to the Defra Statutory Biodiversity Metric Calculator spreadsheet to determine the baseline value of the site.

15.2.4 The post-development masterplan was interrogated to determine areas of hard standing, buildings, and associated infrastructure. New habitats were classified and allocated a target condition, based on habitat type, location and management input. This information was uploaded to the metric spreadsheet to obtain a post-development value.

15.2.5 The pre- and post-development values were compared to determine whether the yield of biodiversity units achieved a deficit or gain.

[10] Defra (2023) The Statutory Biodiversity Metric: User Guide (draft). November 2023.

[11] CIEEM 2017. Guidelines for Preliminary Ecological Appraisal.

[12] Butcher, B., Carey, P., et al. (2020). UK Habitat Classification – Habitat Definitions V1.1. at http://UKhab.org

15.3 Survey Limitations and Constraints

15.3.1 As this assessment is being undertaken retrospectively, a thorough characterisation of the sites baseline habitats and impacts on protected and notable species could not be undertaken. However, the site habitat survey provided data on neighbouring habitats that may provide an indication on habitats present pre-clearance.

15.3.2 The site visit was conducted during the sub-optimal time of year for botanical surveys. However, given the ubiquitous habitats present on site and the data from a recent survey conducted by RSK in June 2023[13], it is considered a robust characterisation of the current site habitats could be achieved. The site was fully accessible. There were no constraints to the survey of the site.

15.3.3 This baseline assessment has been assessed using professional judgement, resulting in a subjective verdict.

15.3.4 The baseline habitat conditions have been taken from historic aerial imagery, via various online sources, as well as the data obtained from the site surveys.

15.3.5 An informed assessment of the impacts on protected species is limited and has been assessed using professional judgement and the likelihood of a species being present on site and the likeliness of an impact occurring, in the balance of probability.

[13] *RSK – Biocensus, 2023. Chear Fen – Preliminary Ecological Appraisal Report.*

16 Results

16.1 Desktop Survey

16.1.1 The desk study results can be seen in Table 1 below.

Designation	Site Name	Distance From Site Boundary
County Wildlife Site (CWS)	River Great Ouse	Adjacent to the sites northern boundary
CWS	Beach Ditch and Engine Drain	0.18km south
CWS	Twenty Pence Pit	0.77km southwest

Table 1 showing all the designated sites within 2km of the site boundary

16.1.2 The desk study identified that the site is located within the Impact Risk Zone of Upware South Pit SSSI, Upware North Pit SSSI and Cam Washes SSSI. The proposed works will not require the Local Planning Authority to consult with Natural England.

16.2 Habitat Survey

16.2.1 The habitat maps are in Appendix B. Target notes and photographs are contained in Appendix C. Species lists for each habitat can be seen in Appendix D. An extract of the data search can be found in Appendix E.

Bare Ground

16.2.2 The site appears to have areas of disturbed ground across the central areas of the site, resulting in what is predicted to be areas of unvegetated bare earth.

Other Broadleaved Woodland

16.2.3 The aerial images indicate an area of woodland located in the western part of the site, adjacent to the onsite ditch.

16.2.4 The area of woodland is dissected by an access track, with the area of broadleaved woodland to the south still present at the time of the site survey.

16.2.5 The woodland appears to be of a similar age, and the baseline assessment for the broadleaved woodland has been heavily informed by the retained part of the woodland.

16.2.6 The woodland comprises trees of a similar age, resulting in a dominant canopy layer with intermittent shrub layer present and little evidence of a field layer, largely due the shading out of the canopy.

Modified Grassland

16.2.7 The site's northern areas, adjacent to the River Great Ouse, appear to have been dominated by grassland. From the historic imagery, it is hard to compile a species list. However, the grassland appears to be unmanaged and dominated by species commonly associated with eutrophic soils, such as Broadleaved Dock *Rumex obtusifolius* and Common Nettle *Urtica dioica*.

Mixed Scrub

16.2.8 An area of mixed scrub appears to be located along the ditch on site, similar to that which is currently present on site.

16.2.9 This habitat lacks management, and the baseline has been heavily informed by the data taken during the site visit.

Tall Forbs

16.2.10 Areas around the peripheries of the bare ground appear much greener in colour suggesting the presence of vegetation. Given the heavy disturbance levels across much of the central area of the site, it has been estimated that these greener areas are likely to have consisted tall forbs species.

16.2.11 A more ephemeral or short perennial vegetation may also have been present on the fringes of the tall forbs and bare ground habitats.

Artificial Unvegetated, Unsealed Surface

16.2.12 The access track off Twenty Pence Road, extending into the site is assessed as consisting a compact crush-and-run, permeable, unvegetated surface. This remains, albeit, likely resurfaced.

Line of Trees

16.2.13 A line of trees runs parallel to the ditch on site, These are largely early-mature in age and provide some habitats suitable various fauns species.

Ditch

16.2.14 A ditch runs through the centre of the site, continuing further east and westwards off-site. The channel is dominated by leaflitter. The water is clear with no discernible flow. No aquatic or marginal vegetation was present, with the bank face and top largely comprising competitive ruderal species. The water appears eutrophic.

Priority Habitats

16.2.15 The desk study returned many records of priority habitat within the study area.

16.2.16 The area of broadleaved woodland existing on site and the section lost to the site works is categorised as priority habitat with a unique reference of PHID54807531_027116621.

16.2.17 The Great River Ouse CWS, located directly adjacent to the sites northern boundary is categorised as Priority Habitat, with references of PHID54876489_027145543 (Coastal and floodplain grazing marsh) and PHID54803016_027132331 (Good quality semi-improved grassland).

16.3 Biodiversity Net Gain

16.3.1 The results of the Biodiversity Net Gain Assessment should be read in conjunction with the Statutory Metric Condition Assessment and Calculation Tool documents[14].

16.3.2 A summary of the retrospective baseline unit scores for the habitats on site can be seen in Table 1.

Habitat	Size/Length	Unit Type (Habitat, Hedgerow, River)	Condition	Unit Total
Bare Ground	1.3103ha	Habitat	Poor	2.62
Broadleaved Woodland	0.3096ha	Habitat	Moderate	2.48
Modified Grassland	1.7131ha	Habitat	Moderate	6.85
Mixed Scrub	0.3777ha	Habitat	Moderate	3.02
Tall Forbs	1.454ha	Habitat	Moderate	5.82
Artificial Unvegetated, Unsealed Surface	0.2096ha	Habitat	N/A	Zero
			Total	20.79
Line of trees	0.3km	Hedgerow	Poor	0.6
			Total	0.6
Ditch	0.3994km	Watercourse	Poor	1.6
			Total	1.6

Table 1 showing the retrospective baseline unit totals for each unit/habitat type on site

16.4 Bats

16.4.1 The data search returned 1 record of bats within the study area. This is of '26 passes' of an unrecorded bat species, dated 1991.

16.4.2 The nearest record of a granted European Protected Species Licence for Bats is located 0.85km north of the site. The record is of a Common Pipistrelle and Brown Long-eared 'resting place' dated 2013-2015 (EPSM2013-6399)[15].

16.4.3 The sites peripheral line of trees, woodland, scrub and neighbouring river habitats provide potential foraging and commuting opportunities for bats and the cleared woodland may have provided potential roosting features for bats.

[14] *Both documents will be provided separately.*

[15] *Magic Maps - Granted European Protected Species Applications (England)*

16.5 Badger

16.5.1 The data search returned 2 records of Badge *Meles meles* within the study area. These were of roadkill and a sett dated 1991.

16.5.2 No evidence of Badger was located on site, or within 20 metres of the site's boundaries.

16.5.3 The sites scrub, woodland, line of trees and grassland habitats provide cover and foraging habitat for Badger *Meles meles*. However, the arable farmland in the vicinity of the site provides more favourable foraging habitat for Badgers. Impacts to Badger are considered unlikely and Badger are not considered further in this report.

16.6 Nesting Bird

16.6.1 The data search returned 93 records of bird species within the study area. None of the records are located within the site boundary.

16.6.2 The trees, woodland and scrub habitats provided suitable nesting habitat for passerine bird species, as well has foraging opportunities. No evidence of nesting birds was found during the site survey.

16.6.3 The site does not provide suitable habitat for ground-nesting or over-wintering birds. Furthermore, no sightings or evidence of ground nesting or over-wintering birds were recorded during the site survey. The presence of horses, cover for terrestrial predators and perches for raptor species on site is likely to reduce the possibility further. Therefore, ground nesting and over-wintering birds are not considered further in this report.

16.7 Amphibians

16.7.1 The data search returned zero records of amphibian species.

16.7.2 The standing water within the ditch on site provides potential breeding habitat.

16.7.3 The sites largely managed grassland habitats provide sub-optimal foraging, dispersal, and cover opportunities for amphibians. However, the woodland, tall forb and scrub habitat are favourable habitats.

16.7.4 The nearest record of Great Crested Newt *Triturus cristatus* is a licence application indicating presence located 4.5km south of the site boundary, dated 2019. This application has case reference of 2019-40817-EPS-AD2.

16.7.5 The site lies within a Green Risk Zone for Great Created Newt which indicates moderate habitat and Great Crested Newt may be present.

16.8 Aquatic Mammals

16.8.1 The data search returned 1 record of Otter *Lutra lutra* and 10 records of Water Vole *Arvicola amphibius* in the study area, dated between 1991-1992.

16.8.2 The sites ditch is considered poor habitat for Water Vole and Otter. However, the adjacent River Great Ouse provides foraging, burrow and holt opportunities for these species.

16.8.3 No evidence of Water Vole or Otter were recorded during the site survey.

16.9 Reptile

16.9.1 The data search returned zero records of reptile species in the study area.

16.9.2 The site provides suboptimal habitat for reptiles. The site is regularly disturbed by human and equestrian activity and does not provide suitable basking sites for reptiles.

16.9.3 No sightings or evidence of any reptile species was recorded during the site survey. Impacts to reptiles are considered unlikely and are not considered further in this report.

16.10 Hedgehog

16.10.1 The data search returned zero records of Hedgehog *Erinaceus europaeus* within the study area.

16.10.2 The presence/impacts of Hedgehog *Erinaceus europaeus* cannot be discounted as the site provided suitable foraging habitat.

16.11 Invasive Species

16.11.1 No records of invasive, non-native species were returned within the study area. Furthermore, no such species were recorded during the site survey.

17 Evaluation

17.1 Development Context

17.1.1 As specified above, some of the site habitats have been cleared without planning consent.

17.2 Impacts on Designated Sites

17.2.1 The River Great Ouse CWS borders the northern site boundary. However, the site works have been conducted a short distance to the south, in the centre of the application site. Therefore, direct impacts are unlikely, particularly considering the relative small-scale and low impact nature of the site works.

17.2.2 The Sustainable Drainage System (soakaway) utilised on site does not result in outflows to the River Great Ouse. Therefore, no indirect impacts to the CWS are anticipated.

17.3 Impacts on Habitats

17.3.1 The assessment of the baseline habitats has been challenging given the retrospective nature and limited photographic evidence of the site pre-clearance.

17.3.2 However, the site survey provided valuable data to help assist in the characterisation of the baseline habitats, and it is considered the habitats have been identified as accurately as possible given the retrospective nature. This includes conjecture regarding the grassland, tall forbs and broadleaved woodland. This is of course subjective, and the decision on what the final baseline position of the site is, may be decided following further discussions with the LPA and/or their ecological consultee.

Bare Ground

17.3.3 The site appears to have had an area of high disturbance within the centre of the site, resulting in exposed earth, likely establishing ephemeral and short perennial species present.

17.3.4 This habitat would have provided limited ecological value and Impacts to this habitat are at site level only.

Broadleaved Woodland

17.3.5 The site works appear to have resulted in the loss of an area of broadleaved woodland.

17.3.6 This habitat is formally identified in the Cambridge City Council local Biodiversity Action Plan (BAP) as a target habitat. Furthermore, the woodland lost to the site works was formally recognised as priority habitat.

17.3.7 The broadleaved woodland is the habitat of most ecological value that has been lost as a result of the site works. The impacts are at local level.

Modified Grassland

17.3.8 This habitat is considered to be of low-moderate ecological value. The grassland is likely to have provided a source of pollen and nectar for invertebrates and foraging habitat for small mammals and amphibians. Impacts to this habitat are at site level only.

Tall Forbs

17.3.9 The tall forbs that dominated the 'construction zone' is considered to be of low-moderate ecological value. This habitat is likely to have provided a source of pollen and nectar for invertebrates and foraging habitat for small mammals and amphibians. Impacts to this habitat are at site level only.

Priority Habitat

17.3.10 The area of on site, broadleaved woodland, identified as priority habitat has been lost. The impact is at local level.

17.4 Biodiversity Net Gain

17.4.1 The pre and post-development site maps can be seen in Appendix B.

17.4.2 The evaluation of the Biodiversity Net Gain Assessment should be read in conjunction with the Statutory Condition Assessment and Metric Calculation Tool documents.

17.4.3 Within the application site the baseline unit values are as follows:

- Habitat units are 20.79
- Hedgerow units are 0.6
- Watercourse units 1.6

17.4.4 The post-development calculations for each unit category are summarised in Table 2.

Habitat	Area/Length	Condition	Unit Total
Habitat Units			
Broadleaved Woodland - retained	0.1298ha	Moderate	1.04
Modified Grassland - retained	1.7131ha	Moderate	6.85
Mixed Scrub - retained	0.3777ha	Moderate	3.02
Tall Forbs - retained	0.1351ha	Moderate	0.54
Sealed Surfaces - Buildings	0.1503ha	N/A	Zero
Sustainable Drainage System	0.0408ha	Moderate	0.1
Artificial Unvegetated, Unsealed Surface	0.8061ha	N/A	Zero
Vegetated Garden	2.0164ha	N/A	3.89
		Total	**15.44**
Hedgerow Units			
Line of Trees - retained	0.3km	Poor	0.6
		Total	**0.6**
Watercourse Units			
Ditch - retained	0.3994km	Poor	1.6
		Total	**1.6**

Table 2 showing a summary of post-development biodiversity net gain calculations

Sealed Surface - Building

17.4.5 This consists of the caravan and day rooms on site.

Sustainable Drainage System

17.4.6 This comprises the soakaway area located in the western part of the site.

Unsealed Surface

17.4.7 This habitat comprises the area of permeable hardstanding access road and parking areas which have been created on site.

Vegetated Garden

17.4.8 This comprises the areas of private garden space allotted to each caravan plot.

17.4.9 The net change in biodiversity units is considered to be as follows:

- Habitat units is -5.34 (-25.71%).
- Hedgerow units is – no change
- Watercourse units is – no change

17.4.10 An extract of the headline results, from the Statutory Defra Metric Calculation Tool, can be seen in Appendix F.

17.4.11 The trading rules have not been satisfied within the metric calculation, due to the loss of habitats of medium distinctiveness being replaced with habitats of low or very low ecological distinctiveness.

17.5 Mitigation Hierarchy

17.5.1 The mitigation hierarchy is a widely used tool that guides users towards limiting as far as possible the negative impacts on biodiversity from development projects.

17.5.2 The mitigation hierarchy steps are as follows:

- Avoid - Project proposals must give the highest priority to 'avoidance' strategies in accordance with the mitigation hierarchy.
- Minimise - Where avoidance is not feasible, it is essential to minimise negative impact by modifying the project design/strategy. All sensitive habitats must be avoided at all costs.
- Mitigate - All non-avoidable ecological damage must be compensated.
- Offset - Final resort after all options have been exhausted: the most expensive, complex, and high-risk approach.

17.5.3 As the planning application and ecological impact assessment has been carried out retrospectively, it is a fair assumption that the mitigation hierarchy has not been considered.

17.5.4 The government implemented statutory BNG through a phased introduction, with major developments in scope from 12 February 2024, small developments in scope from 2 April 2024, and plans for 'nationally significant infrastructure projects' to be in scope by November 2025.

17.5.5 The South Cambridgeshire Local Plan[16], 2018, was adopted in September 2018. Chapter 6 of the plan relates to Protecting and Enhancing the Natural and Historic Environment, in which Policy NH/4 relates to biodiversity. Given the date the policy was adopted, there is no mention of BNG. However, does refer to the mitigation hierarchy:
Policy NH/4, Point 2 – "New development must aim to maintain, enhance, restore or add to biodiversity. Opportunities should be taken to achieve positive gain through the form and design of development. Measures may include creating, enhancing and managing wildlife habitats and networks, and natural landscape. The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation. Priority for habitat creation should be given to sites which assist in the achievement of targets in the Biodiversity Action Plans (BAPs) and aid delivery of the Cambridgeshire Green Infrastructure Strategy".

17.5.6 The South Cambridgeshire District Council outlines their approach to biodiversity net gain, as the Local Planning Authority, in the Doubling Nature Strategy[17], 2021 document in which the following statement was made:
"*We will make the most of our direct influence on the natural environment as the local planning authority. We aspire to achieve 20% biodiversity net gain through development. We cannot require this unless and until it is adopted in planning policy or mandated at national level but will encourage all partners to work with us to achieve this aspiration ahead of policy and legal obligations".*

17.5.7 In the Greater Cambridgeshire Shared Planning, Biodiversity Supplementary Planning Document, 2022[18] document also expresses the goals of development providing 20% net gain:
"Environmental Principles seek to set ambitious goals, including the desire to realise Biodiversity Net Gain (BNG) at 20% for all development types within the Arc. This approach is further supported in more local initiatives like South Cambridgeshire's Doubling Nature Strategy and Cambridge City's upcoming Biodiversity Strategy. Together, these documents set the tone for greater aspiration and more robust biodiversity policies in the emerging Greater Cambridge Local Plan".

17.5.8 The site has been occupied prior to the aforementioned dates associated with the adoption of Statutory Biodiversity Net Gain.

17.5.9 Local policy outlines aspirations for developments to provide 20% net gain, however, such policy has not been adopted.

17.5.10 It is therefore considered the applicant is not to be subjected to the statutory 10% net gain requirements.

17.5.11 Mitigation requirements are likely to be agreed upon following consultation with the LPA and or their ecological consultee.

[16] *South Cambridgeshire District Council, 2018. South Cambridgeshire Local Plan.*
[17] *South Cambridgeshire District Council (SCDD), 2021. Doubling Nature Strategy*
[18] *Greater Cambridgeshire Shared Planning, 2022. Biodiversity Supplementary Planning Document*

17.6 Impacts on Species

Bats

17.6.1 The trees, woodland and scrub habitats provide/provided suitable bat foraging and commuting habitat.

17.6.2 The clearance works have resulted in the removal of an area of woodland. Although this has undoubtedly reduced the quality of this linear landscape feature, it is unlikely to have a deleterious impact on foraging habitat in the locality, given the abundance in the vicinity of the site.

17.6.3 The comprising trees may have hosted features for roosting bats. The likelihood of Potential Roost Features (PRF) to be present on trees generally increases the more mature the tree is.

17.6.4 In the balance of probability, in the absence of mitigation, it is unlikely a bat roost has been destroyed. However, direct impacts on roosting bats cannot be completely ruled out as a result of the loss of woodland. It is recommended bat mitigation is provided on site.

Nesting Birds

17.6.5 The woodland on site would have provided suitable nesting habitat for passerine birds. The loss of the woodland habitat has reduced the sites provision for bird nesting habitat.

17.6.6 The chance of the clearance works being undertaken during the bird nesting season cannot be ruled out. Therefore, in the absence of mitigation, clearance works may have resulted in direct impacts to nesting birds.

17.6.7 Nesting bird mitigation is to be implemented on site.

Amphibians

17.6.8 The pre-clearance, tall forb and woodland habitats on site provided suitable terrestrial habitat for amphibians.

17.6.9 The eutrophic ditch on site provides poor breeding habitat for amphibians, particularly newt species, due to the lack of aquatic and marginal vegetation present.

17.6.10 In the absence of mitigation, the clearance work had the potential to result in direct impacts to amphibians.

17.6.11 Amphibian mitigation is to be provided on site in the form of brash piles.

Aquatic Mammals

17.6.12 The eutrophic ditch on site provides poor habitat for both Water Vole and Otter.

17.6.13 The Great River Ouse provides more suitable habitat for both of these species. However, in the absence of mitigation, it is considered unlikely the site works have resulted in direct or indirect impacts to these aquatic mammal species considering the small, low impact nature of the works and distance between the 'construction zone' and river.

Hedgehog

17.6.14 The sites tall forb and woodland habitats lost to the site works, provided suitable habitat for Hedgehog.

17.6.15 In the absence of mitigation, direct impacts to Hedgehog are unlikely, but cannot be completely ruled out.

18 Conclusion and Recommendations

18.1 Further Survey Work

18.1.1 Due to the retrospective nature of this application and report, further survey work is not possible or required.

18.2 Mitigation and Enhancement Measures

Habitat

18.2.1 As the clearance work included the loss of broadleaved woodland on site, that was/is a formally recognised priority habitat, it is recommended replacement planting is implemented on site.

18.2.2 Habitat mitigation is to be maximised on site to account for the loss of tall forbs, foraging and dispersal habitats for birds and small mammals.

Biodiversity Net Gain

18.2.3 The post-development site plan does not mitigate for the losses of habitats on site, such as the woodland and tall forbs.

18.2.4 It is considered habitat mitigation is to be designed and agreed upon, following consultation with the LPA and or their ecological consultee.

Bats and Birds

18.2.5 It is recommended 3 bat boxes and 3 bird boxes are installed on site on suitable retained trees. This could be dealt with via a suitably worded condition.

Amphibians

18.2.6 It is recommended two amphibian hibernacula are created within the mixed scrub on site, adjacent to the ditch. This could be dealt with via a suitably worded condition.

19 Appendix A: Planning Policy and Legislation

National Policy

The National Planning Policy Framework (NPPF 2023) describes the Government's planning policy for England and how it should be applied. Within this framework, the requirements in relation to biodiversity are included within several policies. The two most relevant to individual planning decisions are Paragraphs 180 and 186, shown below:

- 180. Planning policies and decisions should contribute to and enhance the natural and local environment by:

  a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

  b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

  c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

  d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

  e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

  f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

- 186. When determining planning applications, local planning authorities should apply the following principles:

  a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

  b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on

the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Legislation

The Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000) includes the notification and confirmation of Sites of Special Scientific Interest (SSSIs). SSSIs can be notified for their floral, faunal, geological, or physiographical features. Protection against damaging operations and management of SSSIs is also included within the Act. Impact Risk Zones (IRZs) are zones around an SSSI account for the particular sensitivities of the features for which it is notified and identify development proposal which could have adverse impacts.

The Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000) protects native animals, plants and habitats. Under the Act it is an offence to intentionally kill, injure or take any wild animal listed on Schedule 5 and it is an offence to interfere with places used for shelter or protection, or intentionally disturb animals occupying such places. The Act prohibits picking, uprooting or destroy any wild plant (or any attached seed or spore) listed in Schedule 8.

European Protected Species (EPS) such as bats, Hazel Dormouse, Otter, Natterjack Toad, Smooth Snake, Sand Lizard and Great Crested Newt are protected by the Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000) and the Conservation of Habitats and Species Regulations 2017. The Acts make it an offence to:

g) Deliberately capture, injure or kill an EPS;

h) Deliberately impair an EPS's ability to survive, breed, reproduce, rear or nurture young; to hibernate or migrate; or significantly affect the local distribution or abundance of the EPS.

i) Possess or control live or dead EPS or any part of, or anything derived from a EPS;

j) Damage or destroy a breeding site or resting place of an EPS;

k) Intentionally or recklessly obstruct access to any place that is used for shelter or protection by an EPS;

l) Intentionally or recklessly disturb a structure or place that it uses for shelter or protection that is occupied by an EPS.

All common herptiles are protected under the Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000). Grass Snake, Slow Worm, Common Lizard, Adder are protected against intentional killing or injury. Common Frog, Common Toad, Smooth Newt and Palmate Newt is protected against sale. In addition, all British reptiles, Common toad and Great Crested Newt are listed as Species of Principal Importance.

All nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally kill, injure or take any wild bird or take, damage, or destroy its nest whilst in use or being built, or take or destroy its eggs. It is an offence to intentionally or recklessly disturb a species listed on Schedule 1 of the Act while they are nest building or at or near a nest with eggs or young, or to disturb the dependent young.

The Protection of Badgers Act 1992 makes it an offence to wilfully, or to attempt to kill, injure, take, possess or cruelly ill-treat a Badger, or intentionally or recklessly interfere with a sett. Interference of a sett includes disturbing badgers during occupation of a sett, or damaging or destroying a sett, or obstructing access to the sett.

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 places a duty on every public authority to have regard to conserving biodiversity. Section 41 of the same Act requires the Secretary of State to publish a list of the living organisms and types of habitats that are of 'Principal Importance' for the purpose of conserving biodiversity. The Secretary of State must take steps, as appear reasonably practicable, to further the conservation of those living organisms and habitats in any list published under this section. The list of species and habitats of principal importance currently includes 943 species and 56 habitats. These are the species and habitats found in England which are regarded as conservation priorities under the UK Post-2010 Biodiversity Framework

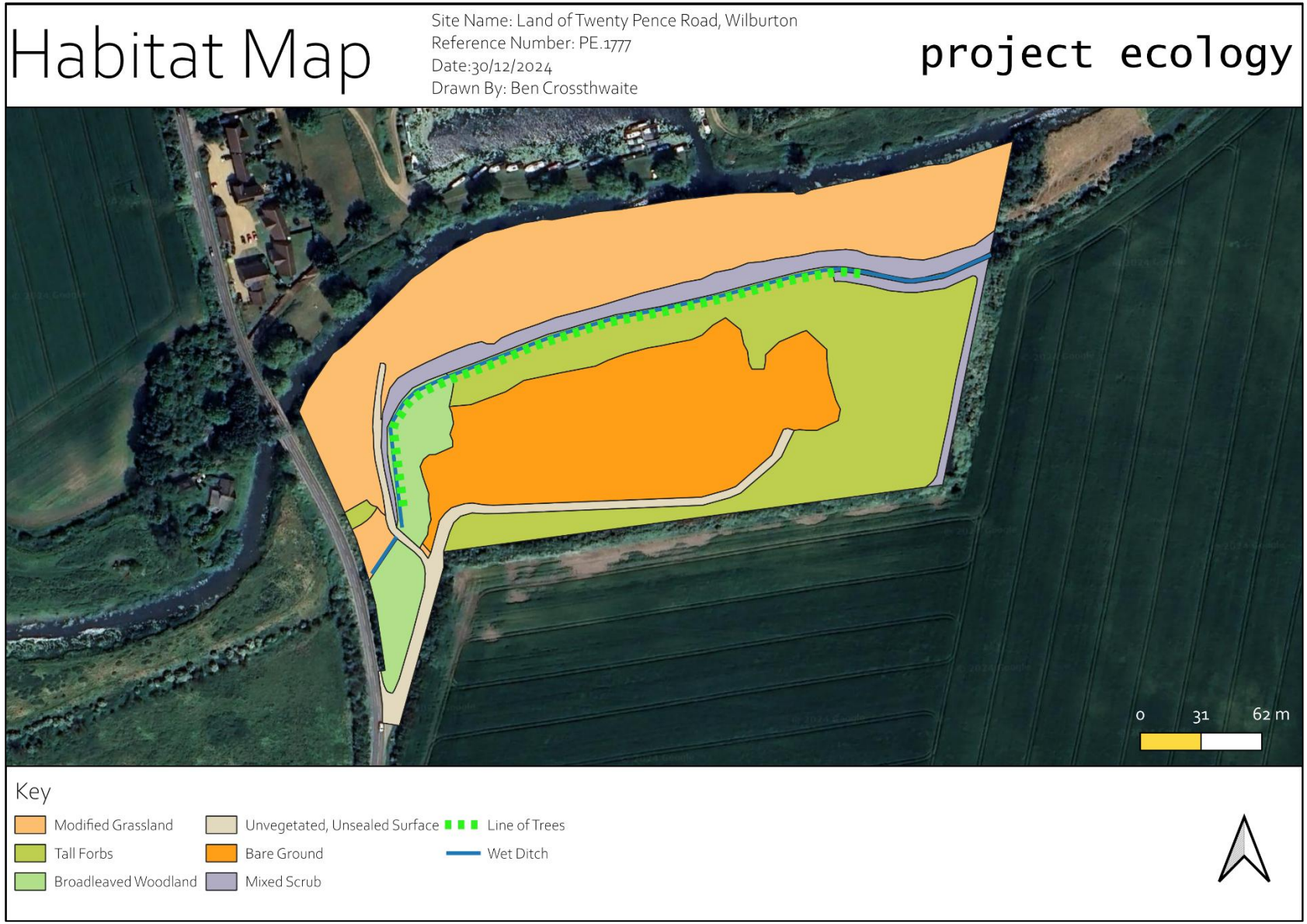
The Hedgerows Regulations 1997 protect 'important' hedgerows from destruction or damage. A hedgerow is 'important' if it (a) has existed for 30 years or more; and (b) satisfies at least one of the criteria listed in Part II of Schedule 1 of the Regulations. Under the Regulations, it is against the law to remove or destroy 'important' hedgerows unless permitted by the local planning authority.

The Environment Bill 2021 makes it mandatory for housing and development, subject to some narrow exemptions, to achieve at least a 10% net gain in value for biodiversity – a requirement that habitats for wildlife must be left in a measurably better state than before the development. Developers must submit a 'biodiversity gain plan' alongside usual planning application documents. The local authority must assess whether the 10% net gain requirement is met in order to approve the biodiversity gain plan.

The Environment Bill 2021 strengthens the duty on public authorities (NERC Act, 2006) to have regard to the conservation of biodiversity.

The Environment Bill 2021 amends the Wildlife and Countryside Act 1981 to introduce an additional purpose for granting a protected species licence in relation to development, 'for reasons of overriding public interest', and two additional tests for the granting of such licences: that there is 'no other satisfactory solution' and that granting the licence is 'not detrimental to the survival of any the population of the species concerned'. These changes will reduce the scope for unlicensed activities to provide clear safeguards before licences can be granted, providing legal certainty and clarity to developers about their environmental obligations.

20 Appendix B: Retrospective Baseline Habitat Map



Appendix B: Post-development Habitat Map

Habitat Map

Site Name: Land of Twenty Pence Road, Wilburton
Reference Number: PE.1777
Date:30/12/2024
Drawn By: Ben Crossthwaite

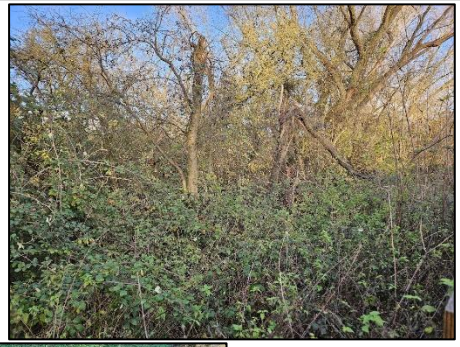
project ecology

Key

- Vegetated Garden
- Sealed Surface - Building
- Modified Grassland
- Tall Forbs
- Broadleaved Woodland
- Unvegetated, Unsealed Surface
- Mixed Scrub
- Sustainable Drainage System
- Line of Trees
- Wet Ditch

21 Appendix C: Target Notes and Photographs

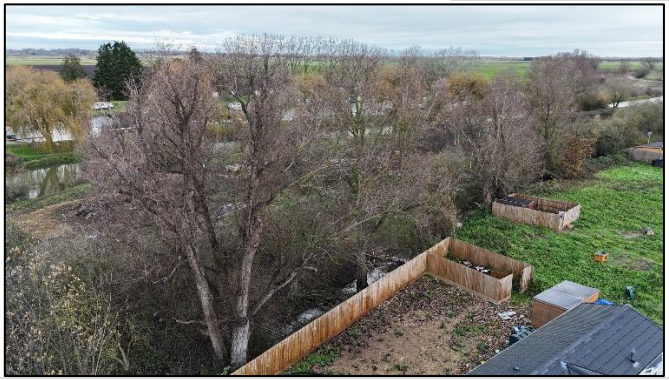
Target Notes		
Reference No.	Habitat/Feature/Species	Photograph
	Retrospective site image dated 05/2020	
	Artificial Unvegetated, Unsealed Surface	 

	Broadleaved Woodland	   

	Modified Grassland	  
	Vegetated Garden	

	Tall Forbs	
	Mixed Scrub	 

	Sustainable Drainage System	 

	Line of Trees	  
	Wet Ditch	 

	River Great Ouse	 

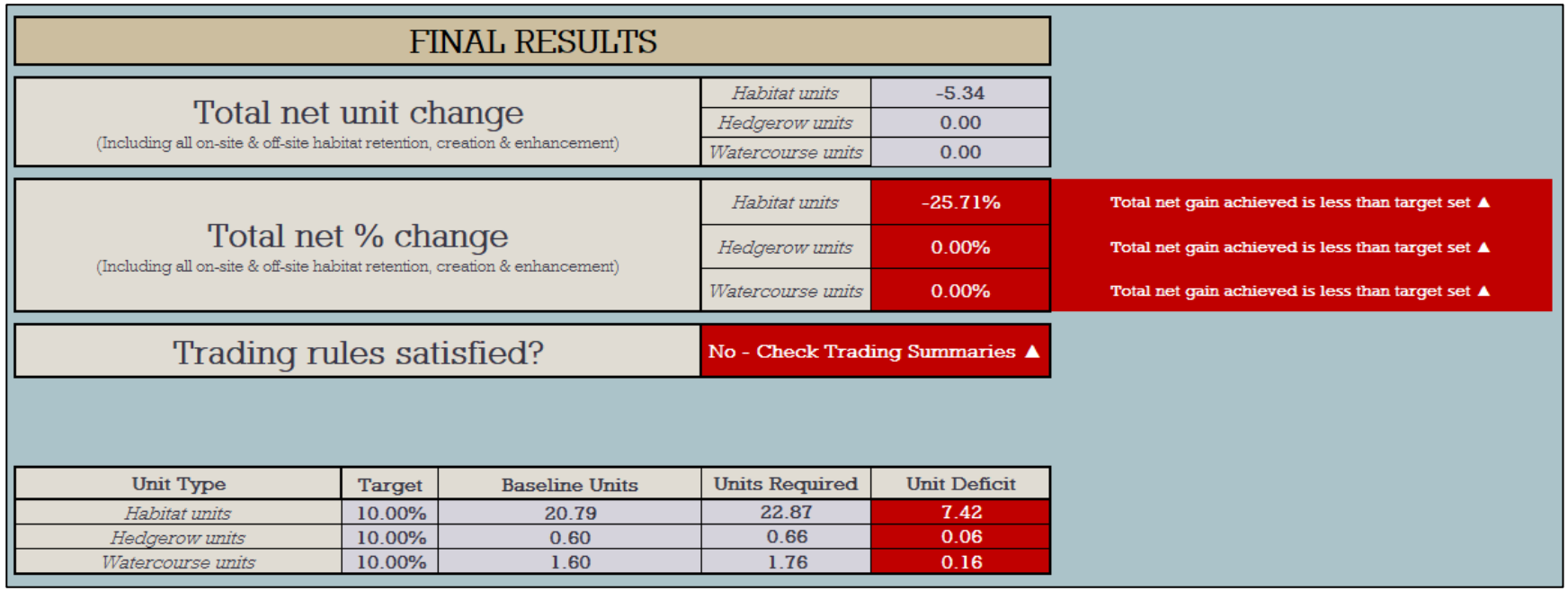
22 Appendix D: Species Lists

Species List		
Common Name	Latin Name	Abundance (or Notes)
Please see the PEA report by RSK for species		

23 Appendix E: Data Search Extract

The results of the data search can be provided on request

24 Appendix F: Calculation Tool, Headline Results Extract



FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-5.34	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-25.71%	Total net gain achieved is less than target set ▲
	Hedgerow units	0.00%	Total net gain achieved is less than target set ▲
	Watercourse units	0.00%	Total net gain achieved is less than target set ▲
Trading rules satisfied?		No - Check Trading Summaries ▲	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	20.79	22.87	7.42
Hedgerow units	10.00%	0.60	0.66	0.06
Watercourse units	10.00%	1.60	1.76	0.16