

APPENDIX

Uttlesford Local Plan (Issues and Options) 2020-2021

First Consultation: Theme 6 Biodiversity February 2021

▪ **Introduction**

- The Community Stakeholder Forum discussed the theme on Wednesday 10 February and the theme was then open for comment.
- Comments received by Wednesday 10 March are summarised below and common themes are shown in the diagram.
- These comments will be presented back to the Community Stakeholder Forum on 24th March and Local Plan Leadership Group on a date to be confirmed.
- Comments received after 10 March up to the close of consultation on 21 April 2021 will be brought together in a document summarising comments from all nine themes, the Council's response and how the issues raised in the comments will be reflected in the Draft Local Plan.
- Between 10 February and 10 March 2021, 20 people, WildThaxted, a major developer's representative and a Parish Council responded to the theme.
- The general feel for topic can be expressed in one respondent's quote from the Dasgupta Review : *"Our economies, livelihoods and well-being all depend on our most precious asset: Nature" such that we need to "Change our measures of economic success to guide us on a more sustainable path"*.

▪ **What we have been told so far**

- The following is a summary of what people said about how we can create and enhance natural assets and biodiversity across the district.
- To read all the representations in full please go to the [Consultation Portal](#).

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- **Summary of Comments**

- 1) Environmental legislation
- 2) Developer obligations: Biodiversity targets and net value enhancement
- 3) Local Plan policy and site designations
- 4) Restoring and enhancing biodiversity
- 5) Road verges
- 6) Stewardship and agricultural land practice
- 7) Access to Open Space and Green Infrastructure
- 8) Creation of Parkland Flooding and Water Control
- 9) Tree Planting
- 10) Engaging Farmers and Land Ownerships
- 11) Parish Councils and Neighbourhood Plans
- 12) Education, Advice, Support Services
- 13) Solar farms
- 14) Light pollution
- 15) Detailed response on water management

- **(1) Environmental legislation**

- The excellent presentation by Andrew Lovett highlighted key issues in the context of pending changes in legislation before the local plan is finalised:
 - NPPF and the Environment Bill,
 - changing political scene e.g. Prime Minister's 10 Point Plan for a Green Industrial Revolution (notably Protecting our Natural Environment).
 - Environment Bill and Local Nature Recovery Strategies/Environmental Land Management Scheme

- **(2) Developer Obligations: Biodiversity targets and net value enhancement**

- Supportive of the role that biodiversity has in reducing the environmental impact of developments and mitigating climate change, with integration of green spaces, nature, and wildlife into new developments,
- Slow down the approval of new developments to protect land; and insist that large scale development schemes include green areas, paths for walking and reduce concrete over green spaces
- The best way to maintain biodiversity is to restrict development to brownfield sites
- Encourage developers to regard biodiversity seriously not tokenistic e.g. allotment, benches, a few trees, with any grassed area treated as a contribution to "green space" even if it is unsuitable as natural habitat, therefore incentivise the provision of high quality green infrastructure, improve biodiversity and integrating properly green

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infrastructure including parks, playing fields, woodlands and gardens, sustainable drainage features and planting alongside roads and streets. Its multiple benefits include a strong sense of place, water management, reduce flood risk, and mitigate the overall impact of development and enhance biodiversity.

- Classify green space according to its biodiversity value in new planning applications with weighting attached to its quality
- Ecological reports must be prepared by truly independent experts and cover the total impact on soils, water sources, animals, and plants. Developers or their ecology consultants should be required to use the Biodiversity Net Gain Metric Calculator available via Natural England (published August 2020) or explain why it is inappropriate in their case.
- Developers should be required to match building acreage with woodland acreage, owned and managed by local communities
- Developers must give consideration of movement of wildlife, hedgehogs ('hedgehog highway' linking gardens with appropriately sized fencing holes.), shrews, birds etc which move between gardens; incorporate ponds for fishing, stocked with British species; tank rainwater run-off
- Require Developers to include more greenery in landscape proposals e.g. green walls, green roofs, hedges, double native tree cover with mandated policy on the amount of greenery so there is a net gain and extended to ALL development of whatever size
- Role of Master Planning to ensure connectivity between habitats, presence of existing natural resources with a presumption of protection made for them and clarity over definition of a “net gain” in biodiversity.
- **(3) Local Plan Site Designations, Policy and Protection**
 - supportive of Uttlesford’s approach to create and enhance natural assets through strategic policies within the Local Plan, and as set out in the National Planning Policy Framework, to ensure environmental objectives are delivered to meet the needs of new and existing communities and future generations
 - a multifunctional approach should be used by Uttlesford District Council towards biodiversity and green infrastructure to deliver enhanced biodiversity, nature improvements whilst also providing benefits to sustainable development e.g. SUDS pond for drainage, wildlife habitat and an attractive outlook and amenity space. Use planning policy to secure and mandate this multi-functional green space within and beyond development sites e.g. homes to be within 0.5 km of a quality green space.

- Strategy- There needs to be a team tasked at creating a proactive and restorative 'big plan' up front and in advance of development proposals , identifying all aspects of nature from hedgerows to overgrown alleyway, wasteland, existing corridors, hedgehog routes, frog crossings and deer crossways. This will also help to achieve a 10% net gain in biodiversity overall
- Councils should adopt rewilding policies and identify suitable sites for increasing biodiversity
- The Local Plan must specify how biodiversity targets will be measured and differentiate between poor quality green space and high value habitats,
- LPA to seek greater powers to enforce biodiversity targets.
- Encourage small rural industries e.g. using coppiced timbers
- The Local Plan should identify new sites for nature reserves, parklands, and pathways that could form natural highways
- to preserve and protect as much of the existing environment as possible e.g. Hatfield Forest and ancient woodland, Chalky Meadow and Mosscotts Meadow in Thaxted following local community documentation surveys
- Uttlesford has a paucity of designated wildlife sites, with nearest Essex Wildlife Trust Nature Discovery Centre 30 miles away from Thaxted, and no bird hide on any nature reserve site within the District. Identify sites of importance and designate them in the Local Plan with policies on sensitivity and capacity to absorb development.
- well-connected to other green spaces and networks. By ensuring that landscape areas and green spaces connect to the existing network of green infrastructure elements (e.g. waterways and wildlife corridors) at a strategic and local level allows for a joined up and complimentary approach to both nature and development.
- Stop building on farmland
- Stop the expansion of Stansted
- **(4)Restoring and Enhancing Biodiversity**
 - restore habitats for species once common in our areas e.g. suitable for Yellow Hammers, Hedgehogs and Great Crested Newts, and develop ecological corridors to join up existing spaces, allowing wildlife, pollinator friendly planting, vertebrates,

small mammals and birds to move and expand their habitats, 500m wide and to include farmland and hedgerows.

- establish new areas of woodland managed to provide income e.g. coppicing and contribute to carbon sequestration
- Carbon should be used as a value and not just monetary values so viability and the assessment of development proposals should be considered from a carbon sequestration or net reduction basis. It is crucial to develop and agree the metric which has yet to be finalised nationally.

▪ (5) Roads and Verges

- Cross boundary working on Nature with adjoining authorities e.g. major roads can be crossed by tunnels
- Wildflower planting on verges within Highways adopting appropriate management practices, as well as along private roads
- Broaden the protected verges initiative. ECC to formulate specific policies as to how they should manage their verges with a view to improving habitat quality
- Consider wildflower planting in all public areas including school fields, cemeteries etc

▪ (6) Stewardship and Agricultural Land Practice

- Sustainable stewardship practices should be encouraged in respect of trees, hedgerows, field margins, wildlife cover, ponds.
- Farmland to adopt sustainable practices with high proportion of Natural Green Infrastructure, mandated through planning or government policy using best scientific research to advise.
- Developers should finance and set up experienced land management company with adequate funding and not expect the residents' management company to be responsible. Should be agreed pre-construction.
- Proper land maintenance essential to avoid failed systems with flooding on the site or neighbouring ones, damage to habitats.

- Keep as much undisturbed topsoil as possible, be seeded with appropriate wildflowers rather than turf and managed accordingly. Soil to be tested regularly and be used to maximise carbon sequestration.

▪ **(7) Access to Open Space and Green Infrastructure**

- Shortage of open space in Uttlesford, (UDC Open Space Assessment Report, February 2019, and Essex Green Infrastructure Strategy of 2020), with heavy dependence on Hatfield Forest and hence advocate the preservation and restoration of Easton Park for the wellbeing of local communities
- Variable distribution of publicly open space with more Green Infrastructure in the south such as woodlands and grass than in the north with more agriculture, shown in the ANGST standard (Accessible Natural Greenspace).
- Public Rights of Way give poor access to GI for disabled and people with reduced ability or time to walk far (e.g. poorer, key or shift workers. So, in areas below the ANGST benchmark of 4, UDC should prioritise the development of a local park, with green spaces, flower meadows, and access to nature accessible for all to enjoy.

▪ **(8) Creation of Parkland**

- Support the idea to create a park on the proposed Easton Park ‘new town’ site and in any case its restoration for the wellbeing of local communities. It is an ancient medieval park, one of the largest in Essex with presumed 1939 planning agreement to protect it (*Note from UDC- legal opinion currently being sought on details and parameters of this*). Easton Park is encircled by ancient woodlands, High Wood, Stone Hall, The Lays, The Gardens of Easton Lodge and the Conservation Area which together provide a wildlife habitat and open space with potential for the Essex Forest Initiative, The Queen’s Green Canopy initiative to mark the Platinum Jubilee, and flagship for Uttlesford and Essex.
- Identifying land in the Local Plan for the creation of another public park in Uttlesford to relieve the pressure on Hatfield Forest.
- The Lawton Review stresses the need for ‘more and bigger sites to be protected for nature conservation’ as the most effective way to protect biodiversity but relatively few opportunities for larger sites.

▪ **(9) Flooding and Water Control**

- (See also full response at end of this paper on water management)

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- Requirement for a proactive (not reactive) drainage and flood management plan in all new and existing developments to counter regular flooding of many roads and villages due to blocked drains. Likely to get worse because of weakening Gulf stream and stormier British winters
- New developments to have Sustainable Drainage Systems (SuDS) mandated in planning policy. Must be built exactly to design and maintained for the life of the development by an appropriate body clearly responsible, funded and committed (see (6) above)
- Depletion of the River Cam biodiversity because of pollution from sewage discharge by water companies (work done by CURAT, raising awareness of the continually reducing water levels in the upper River Cam chalk stream)
- Consider rainwater and greywater use with inadequate water supply and pressure of more housing
- Natural water management by storing water in woodland and flood plains to release a constant, significant flow e.g. alongside the railway when entering Newport from the south; should undertake a feasibility study by experts in suitable locations
- Water companies and water pollution to be closely monitored especially of the River Cam

▪ **(10)Tree Planting**

- All developments to include significant tree and hedge planting programmes and to ensure that their planting and ongoing management are properly enforced. Developers should be required to include a plan to enhance the biodiversity to include replacement X2 of any removed trees or hedges
- Should require a proper management plan and adequate resourcing to be made available to maintain tree planting
- tree planting must be in the right places, with the right trees so as not to be detrimental to productive farmland. Impact of deer culling?
- Engage Essex Forest Initiative to increase planting across sectors
- Maintain distance from Ancient Woodland like Alsa Wood Elsenham and Hatfield Forest. is under extreme pressure but still UDC allows development along its boundary

- UDC to explore using LIDAR tool as a project to map of trees and hedgerows as presented by the speaker. Necessary where developers might chop trees down prior to planning permission. Need, from a biodiversity (and Climate Emergency) viewpoint, to preserve mature trees which are proven to cleanse air of CO2
- **(11)Engaging Farmers and Land Ownerships**
 - As custodians of land they must be supported and work in partnership if we are to hope to increase biodiversity because agricultural actions have a big impact on biodiversity.
 - Need clarity on who owns green infrastructure in Uttlesford and whether it is publicly accessible. Footpaths are not always well signposted, and woodland is often kept private.
- **(12)Parish Councils and Neighbourhood Plans**
 - Neighbourhood Plans should include a register of natural assets and policies on protection and enhancement of local resources.
 - Engagement role for Local people and nature groups in maintaining and monitoring progress.
 - Every Parish to have a biodiversity action plan and ensure they are executed. They would undertake a nature audit identifying important sites using local wildlife enthusiasts looking for opportunities to enhance, protect or amalgamate sites. Works could be undertaken as a part of a policy linked to s.106 obligations
 - Reintroduce incentives for '*Town in Bloom*' activities encouraging pollinators
 - Capture local enthusiasts and development local biodiversity engagement programmes to involve local people in protection and enhancement projects.
 - Ref Made Neighbourhood Plan (<https://www.felsted-pc.gov.uk/wp-content/uploads/Felsted-NP.pdf>), which was a major project spanning several years
- **(13)Education, Advice, Support Services**
 - Engage with an organisation like Plantlife, (<https://www.plantlife.org.uk/uk>) or WildEast who is influential among farmers (<https://www.wildeast.co.uk>)?
 - Provide education and advice on green roofs, vertical planting, suitable trees etc.

- Educate all residents and anyone working within UDC area on value of biodiversity, use campaigns, education, competitions

- **(14)Solar Farms**

- should only be allowed if they enhance biodiversity and treated as temporary solutions with solar panels designed to be removable in future.
- solar farms and their competition with food production could be alleviated with perimeter trees and hedgerows, wildflower planting between panels to benefit insect diversification and bird life and reduce carbon emissions so long as the scheme is properly managed.
- stop 'planting' solar panels on agricultural land but should be mandatory on all new housing and all commercial property.)
- consider Solar Community Interest Companies that generate energy for the local communities.

- **(15)Light pollution**

- reduce excessive light pollution by reducing the output of lamp standards; LEDs can be turned down with no detrimental effects to public safety
- exclusion of all non-essential external lighting.

- (16) *In addition there was a full response about local flooding and amelioration measures from one resident who said, in response to our question and copied verbatim here (summarised above):*

Question: Thinking about the issues and questions raised in the diagrams below, use this page to tell us how we can create and enhance natural assets and biodiversity across the district. If you wish you can send us a photograph or image illustrating your response.

B1383 Flooding.

Introduction.

There has recently been regular flooding or pockets of standing water on the B1383 between Sparrows End and Newport. As the road is a major route though Uttlesford, it has several key functions; local traffic, an alternative route when there are problems with the M11 between Stumps Cross and Birchanger, and probably the most significant route for emergency vehicles servicing the local area and for their access to the M11.

Whilst there has been exceptional rainfall over the last two or three months that has caused the flooding, all predictions are that this will happen more often in the future. Under these circumstances it would be understandable if the County Council were investigating the possibility of improvements to drainage along this stretch of road.

There seems to be a general acceptance that the flooding happened because the River Cam 'burst its banks'. The Cam did not burst its banks and it did not come anywhere near the height of the road. I live in between the river and the road (approximately 100 metres from the flooding) and would know about it if it had. The water that flooded the road drained off the field between the road and the railway line (in addition to the rainfall directly on to the road).

'Improving' drainage from the road will speed up the flow of this water to the River Cam, increasing the flow of the river, and add to problems downstream in Littlebury, Little Chesterford and Great Chesterford. Making this statement without local knowledge, it appears to an outsider that Ickelton and Hinxton are less affected by increased river levels.

Accompanying the water down from the field is a large quantity of silt, which is the main part of the problem with flooding as the existing drains become blocked. Large amounts of mud are deposited on the road, requiring work by the council even after the water has drained off. Any drainage system would need to address this problem.

Credit is due to English Heritage for managing the flow of the river through Audley End (and thereby protecting the villages further downstream) by allowing the Cam to flood over the extensive grounds at the front of the house. It is a natural flood plain which regulates the flow of the river.

Any work to the drainage for the road will almost inevitably mean extensive works to the road itself. As these are all eye watering expensive, there will be an inevitable reduction in works elsewhere due to finite resources. There may be an opportunity to address the issue in a more creative way that fits with the Government's ambitions regarding the environment.

Given the cost of initial works and ongoing maintenance costs, an alternative way of preventing, rather than curing the flooding should be investigated. If a prevention option *could* address the

national and local government aspirations to make a step change in sustainability and environmental improvements, plus a significant saving on on-going maintenance costs, surely it should be considered and investigated.

Any journey around the area during the recent heavy rainfall, particularly in the Wimbish, Debden, Henham and Widdington areas, plus the high ground around Langley, would have demonstrated why these areas are the source of the rivers Cam, Chelmer and Stort*. In these areas, water is stored in woodland, ponds, ditches, and fields, which presumably gradually drains off over time to feed these rivers, and possibly adds to the aquifer from where some domestic water is sourced. This water storage is significantly diminished when drainage is used to protect arable land at lower levels.

A recently produced document by the friends of the Upper Cam (known as CURAT - curat.org.uk) was an excellent summary of the challenges to the health of the Cam due to reduced flows. As well as abstraction, the rapid release of rainwater from the surrounding countryside is causing an irregular flow. Irregular means short periods of excessive flow, but more often that the water levels are too low to sustain the biodiversity expected in a chalk stream (yes, the upper reaches of the Cam are designated as a chalk stream).

It is well known that woodland and uncultivated land retain water and release water much more slowly than cultivated land. Walking the hills in the area are a clear demonstration of this release in action – all the areas where drainage channels (as opposed to holding areas) have been dug have resulted in flooding further down, usually, but not always, in the fields or roads at a lower level. Farming is a vital part of our local economy, and a very significant part of the future of our environmental ambitions. The government is recognising this by moving subsidies and grants from production (or non-production) to incentives to farm in a sustainable and environmentally friendly way.

The proportion of farmland in Uttlesford is significantly higher, at over 66% of green space, than the rest of Essex (the lowest being under 11%), whilst the proportion of accessible green spaces in Uttlesford is the lowest in Essex, under 14% of total land area. This compares with, at the other end of the scale, 49%. (This information extremely well laid out by Prof Andrew Lovett of UEA at the recent Uttlesford Council Biodiversity Forum Theme 6). Obviously, the main driver of these variations will be the suitability of land for farming, but an attempt at rebalancing will not significantly affect overall productivity.

If a fair price were offered for the land to the west of the B1383 between Newport and Sparrows End and up to the railway line (if it was 50 acres at, say, £7,000 per acre, it would be £350,000...how much would the works to the road and ongoing maintenance cost?), a little bit of earthworks – creating a few ponds - lots of volunteer labour to rewild the area, a potential solution to the flooding the B1383 could result in a wonderful amenity for the people of Saffron Walden, Newport and the surrounding areas.

Planting young, bare root trees would be cost effective and achieve the maximum carbon uptake during the growing phase. The creation of the new wild area would provide innumerable project and forest school opportunities for all schools, colleges, and nursery schools, plus be a community activity which we all need. It would be part of regulating the flow of water down to the Cam, rather than adding to the volatility. It isn't a game changer, but it will be part of the solution rather than worsening the problem. Doing nothing because we can only do a little is not an option.

A track through the reclaimed area to Audley End station, carrying on to the cycle route up to Saffron Walden, would encourage cyclists and pedestrians who are currently unwilling to take their life in

their hands and risk riding or walking alongside the traffic currently speeding between Sparrows End and Newport.

*some suggest the source is to the west of Stansted Mountfitchet.

Summary.

This piece is written from a position of little knowledge, which is obviously a dangerous thing. The prompt has been the extensive experience of cycling and walking around the area and seeing the impact of the exceptional rainfall in different areas and environmental conditions.

Some excellent work was done by CURAT, raising awareness of the continually reducing water levels in the upper River Cam, which also reminded me that the upper Cam is officially designated as a chalk stream – no surprise when looking at the quarry to the south of the village.

Storing water in woodland and flood plains will release a constant, significant flow, which is going to be an increasingly important part of our environmental and sustainability ambitions.

We already have a perfect example of this effect of natural water management, which is alongside the railway when entering Newport from the south. It may or may not be unrealistic to expect rewilding this area to solve the flooding problem on the B1383, but at worst, any costs would be justified by having restored accessible natural habitat. Should it be successful, there are many opportunities to create more of these areas.

- Surely a feasibility study by experts would be worthwhile, especially if major works are being considered?