



3 August 2010

To whom it may concern

Planned housing developments in Catfield, Norfolk

It has been brought to our attention that plans to build more residential housing in the village of Catfield may have a detrimental impact on local biodiversity. We understand there is a choice of locations on which new building work may occur and that future development will either have a low or high impact on local wildlife depending on which site is selected. As a wildlife conservation charity we are acutely aware of the long-term and continuing declines in UK biodiversity and would ask the decision makers in this case to minimise biodiversity loss by developing on sites where the impact will be low.

The Final Sustainability Appraisal (part 2) of North Norfolk District Council's Local Development Framework highlights an area of unimproved grassland with trees as one area for possible development. This is mapped as CAT01 on page 322 of the Appraisal, and the report itself recognises that development of this area will have a high biodiversity impact. The mosaic structure of the site, with elements of woodland, scrub, traditional orchard, rough grazing, unimproved grassland and hedgerow, immediately lends itself to supporting a variety of species within a small area. Buglife focuses on the conservation of invertebrate species, many of which have more complex life-cycles than vertebrates or plants. Insects in particular often have contrasting requirements as juveniles and as adults. Larvae tend to be relatively immobile and need specific niches such as fallen logs, dense herbaceous vegetation or areas of exposed soil in which to develop. Adults are usually more mobile require wildflowers as nectar sources for energy. The CAT01 site supports a variety of habitats that will support a diverse range of wildlife.

Unfortunately invertebrate records for the site are lacking as relevant surveys do not appear to have been carried out. However, based on the range and pattern of habitats that are present we would presume this area is of high biodiversity value. We therefore suggest this site should not be considered for development, particularly given that alternative development sites are located nearby. If CAT01 remains under consideration for development we recommend that biodiversity surveys be conducted to assess the value of the site before a final decision is made. A number of important bird and mammal species have already been identified within the area, and moves should be taken to protect these species. However, as the invertebrates constitute 64% of all British wildlife and 98% of our animal species, we would argue that a full and rounded judgement on biodiversity value and loss could not be made without further survey. Within the landscape of the Broads, where a number of reserves support significant biodiversity, it can be expected that pockets of suitable habitat, such as CAT01, will also be important for biodiversity.

The elements of traditional orchard habitat within CAT01 are of particular interest as this is listed as a Priority Habitat for conservation in Britain. The extent of traditional orchard habitat remaining in Britain is small and any added loss should be avoided. A number of scarce species, such as the Noble

chafer (*Gnorimus nobilis*), are associated with orchards and their conservation depends on us maintaining surviving orchards and ideally reinstating them as a functioning habitat. A target of the Norfolk Biodiversity Action Plan is to prevent further loss of traditional orchards and to create new orchard habitat at a rate of 2 hectares per year. The development of CAT01 would therefore run counter to Norfolk's Biodiversity Action Plan.

Another factor for consideration is the Biodiversity Duty outlined in the Natural Environment Rural Communities (NERC) Act 2006 whereby public bodies must have regard for biodiversity as part of their other functions. The Appraisal already shows that North Norfolk District Council have made an assessment of expected biodiversity impact of developing various sites in Catfield. Given this assessment it would not follow the aspiration of the duty to develop CAT01 where biodiversity impact will be high when developing other sites will have a much reduced impact.

A quick summary of long-term and recent trends in UK biodiversity will put our concerns over CAT01 in context. Recent declines in British bee populations have been well publicised. Unfortunately the bee declines are a relatively recent example of a wider malaise. For all groups where data exists (e.g. moths, butterflies and ground beetles) we have seen steady declines since recording started, which for some groups extends back to the 1960s. Biodiversity in the British landscape is now relatively poor, due to the gradual erosion of natural habitats and their quality in the post-war period. The UK Biodiversity Action Plan (BAP) was established in 1994 to help redress the balance and in 2002 the government set a target to "slow the rate" of biodiversity loss in the UK by 2010. The latest review of the Biodiversity Action Plan shows that more BAP species are declining than recovering, and the proportion of BAP habitats that are disappearing has actually increased in the past few years, which is very alarming. The country's 2010 target to slow the rate of loss is far from being met.

More research is being carried out on the economic value of biodiversity as the impacts of its loss are being felt. In Britain pollination services are already affected economically and other services such as nutrient cycling and soil stabilisation are almost certainly affected. A National Ecosystem Assessment is due to report later this year, which will aim to quantify the costs of biodiversity loss and the financial consequences of not acting to halt such losses. The calculations continue, but it is becoming clear that the cost of halting biodiversity loss now will be much cheaper than the future costs of dealing with the effects of continuing biodiversity declines.

Given our legacy of biodiversity and habitat loss over the past few decades the need to retain sites that support good levels of biodiversity is obvious. Biodiversity declines are still not well publicised in the UK and are often not widely recognised until higher level impacts become visible. The decline in farmland birds is such an example. Within this letter I have alluded to a number of reports and sources of information that explain these losses and their potential impacts. Many of these reports are public domain and I can furnish further information on request and as appropriate. If you have any queries on any of the points I have made here feel free to contact me for further clarification.

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