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By EMAIL

To: Luke Waddington, Greater Cambridge Planning

Date: 12th January 2022

21/05476/FUL – Hybrid Application for Land South of Coldhams Lane

Dear Luke,

The Wildlife Trust objects in principle to this application as it results in the permanent destruction of a City Wildlife Site and a significant net loss in biodiversity, contrary to national and local planning policy and to the City Council's doubling nature aspirations.

Our comments in response to the previous application (21/02326/FUL) regarding the principle of this development remain valid. The City Council was wrong to allocate this site for development in the Local Plan effectively supporting the applicant's pre-emptive destruction of the City Wildlife Site.

The Wildlife Trust maintains our previously stated position that the correct baseline for both the Environmental Statement and Biodiversity Net Gain (BNG) Assessment should be the 2005-2012 state of the City Wildlife Site (Parcel A) pre site clearance. While welcoming the use of this baseline for the BNG Assessment, we disagree with using the current (destroyed) state of the site as the baseline for the Environmental Statement. As such we believe the **Environmental Assessment is fundamentally flawed**, and we will therefore not comment further on the details within it, except in so far as it relates to the assessment of whether the development delivers a net gain in biodiversity.

Biodiversity Net Gain Assessment

The Wildlife Trust welcomes the submission of a biodiversity net gain assessment using the Defra Biodiversity Metric 2.0. However, there are a number of issues with the submitted assessment, including:

- downplaying of the baseline value of the site (particularly parcel A which was destroyed by the applicants in 2013),
- overplaying the value of some habitats to be created (such as chalk grasslands and possibly the open mosaic habitats), and
- a number of errors in using the Metric, contrary to published advice (including assigning the wrong scores).

Looking at the applicants own summary calculation (para 38 of Appendix 11.2) the claimed 7.67% net gain is inaccurate. **The applicants own figures actually show a negligible net gain of 2.14%. However, the Wildlife Trust believes that with a revision of the figures to address errors and inconsistencies, the actual position is likely to be a clear net loss in biodiversity. Either way, a 2.14% net gain is well short of the 20% aspiration set out in the most recent Greater Cambridge Local Plan documents.**

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The easiest way to comment on this BNG assessment in a transparent way would be for the applicants to provide an original editable copy of their Defra Biodiversity Metric spreadsheet to ecological consultees, so that we can use the reviewer comment boxes to indicate where we disagree with the assessment and why. The submitted PDF document is not completely legible and is difficult to comment on clearly and concisely. It would also be helpful if the applicant provided plans of the land parcels that show the location of each habitat category used in the biodiversity assessment.

This will enable the City Council to facilitate a transparent dialogue with the applicants and consultees and enable a shared understanding of the extent of biodiversity net loss or net gain to be presented to councillors prior to a planning committee decision. **Therefore please can the applicant provide the original editable excel version of the Defra Biodiversity Metric spreadsheet for review along with clear habitat plans that relate to this?**

The Wildlife Trust does acknowledge that the simplified Defra Biodiversity Metric is only one aspect of assessing whether a proposal delivers a Biodiversity Net Gain, and that other measures including for particular species groups play an important role in assessing whether biodiversity net gains are achievable overall. We do acknowledge that there are a range of species specific measures included in this application, which if implemented would be commendable. However, these will not readily make up for the loss of the mature mosaic of habitats in parcel A. Our 2005 report, undertaken in September, noted *'It is recommended that a breeding bird survey be conducted at the earliest available opportunity to scientifically assess bird populations on the site. Given the intricate mosaic of scrub and rough grassland there is potential for interesting invertebrate populations on the site, and this should also be investigated.'* Parcel A was of significant local value for fauna groups prior to its destruction. Any species-specific measures delivered through this application have to work alongside and be additional to the assessment using the Biodiversity Metric. They will not usually be sufficient by themselves to compensate for net losses as measured through the Biodiversity Metric, particularly as it will take years to replicate the habitats lost on parcel A. One way that this could be partially taken account of is within a revised Biodiversity Metric, by using the "delayed habitat creation function", which we will demonstrate once we receive a copy of other original Defra Biodiversity Metric spreadsheet.

Finally, we note that the applicants propose a management period of 25 years for the ecological mitigation areas. This is short of the 30 years period set out in the Environment Act for delivery of BNG. However, the loss of the habitats on the City Wildlife Site (parcel A) are for ever, therefore the proposed ecological mitigation and enhancement measures should also be provided in perpetuity, otherwise the development will not be capable of delivering a biodiversity net gain. **The Wildlife Trust will not comment further on this aspect of the application until we have received a copy of the BNG Assessment spreadsheet and relevant plans.**

Proposals for the lakes

The proposals for the lakes form the basis for further detailed discussion, and include some positive elements. However, there are also aspects that are not likely to work in practice, such as trying to retain the Eastern Lake as a nature priority area. The only way this might work is with an extensive on-site ranger presence, including out-of-hours, and possibly the closure of the site out-of-hours. The area is already extensively used by local teenagers and young adults, in spite of it being a no access area, and the proposals as they stand will not prevent this.

The opening up of the lakes will inevitably result in increased recreational disturbance and a decline in the quality of some habitats present on site. There is a balance to be struck between public access and nature on such a constrained site. One particular example, relates to impacts on wintering and breeding birds. With respect to wintering birds, the deep water lakes are most valuable during extended cold spells when wetlands on the near continent and elsewhere in East Anglia are frozen over. None of the surveys undertaken have coincided with such a period of weather therefore there is a danger that the value of the site will be under-represented and the assessment of impacts downplayed. The introduction of significant recreational uses including dog walking is also likely to reduce the ecological value of some of the other habitats on site, such as the chalk grassland, which will be highly unlikely to achieve the proposed good

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condition. This will in turn have a further negative impact on the assessment of biodiversity losses / gains arising from the development. It should be accepted that opening up to recreational uses will in all likelihood result in a decline in some habitats, or at best will prevent them reaching their full potential, and this must also be fed into the Biodiversity Net Gain assessment (see above).

Successful integration of nature conservation and public access objectives will require significant investment and design and implementation of a high quality management plan over an extended period. The health & safety risks associated with the site are considerable and the level of on-site supervision required to achieve the predicted benefits is likely to be high. The Wildlife Trust has extensive experience of managing land for nature and public access and we do not believe that the proposed development would be able to afford the intensity of management effort required to make the site a success and deliver the promised benefits. **The costs of managing this site should not be underestimated, so we would advise the City Council to request that a site management plan and business plan with management costs be prepared now, ahead of any planning committee decision, in order to inform the decision. This is essential in allowing the City Council to reach an opinion on whether the proposals are deliverable with the S106 allocated money and the potential revenue streams.**

The underestimating of future management costs, runs the risk that new recreational uses will be introduced to the site in the future to generate additional revenue income. These could include water-based recreational activities or greater use of the site for events. However, the process of doing so would further compromise the biodiversity of the site. **We do not accept the conclusions of the applicants that the site will not suffer from adverse indirect or direct impacts from increased recreational use.**

A coherent and sustainable business plan must form part of the assessment of these proposals, to demonstrate that they are deliverable in practice and will deliver both the promised recreational benefits and biodiversity benefits. If this is not forthcoming, then it must be assumed that recreation uses will take precedence in the future, and the adverse impacts on biodiversity of this should be assessed in the Environmental Impact Assessment and reflected in the BNG assessment.

The submitted documents also do not clearly show how the proposals for the lakes will be delivered across two ownerships, with part of the eastern lake not owned by the applicant. The future management of the must be treated as a whole, if it is to be sustainable, and the applicants need to explain how this will be achieved.

Finally, we believe that 25 years is too short a period to plan for the management of the lakes. How will the stated public benefits be secured beyond the initial 25 years, and shouldn't those public benefits be secured in perpetuity in return for the granting of planning permission for this development and the permanent loss of the City Wildlife Site?

I hope these comments are of help to you. If you have any queries regarding this advice, please don't hesitate to contact me.

Yours sincerely,

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Conservation Manager

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