



Wildlife Trust for
**Beds, Cambs
& Northants**

Greater Cambridge Local Plan 2025 – Consultation Draft Wildlife Trust BCN Comments

Growth Development Strategy & Vision

The Wildlife Trust supports the climate-led vision approach to the Local Plan.

However, the Wildlife Trust is extremely concerned regarding the scale of growth placing further unsustainable demands on water resources to the detriment of our already depleted chalk aquifer and degraded chalk streams which are in a poor ecological condition. The proposed Fens Reservoir will not be completed until the late 2030s and the proposed pipeline from Grafham won't be in place until 2032. In the meantime, our chalk streams will not be able to recover in spite of proposed massive investment through Water Companies funding without sufficient supplies of good quality water. It is likely that the Cambridge Water abstraction from the chalk aquifer would have to reduce by half to recover near natural flows. However, the scale of proposed housing and jobs included in the Local Plan will only exacerbate the problem without radical and faster solutions, none of which are in place.

We also suggest that the overall development strategy is inconsistent and not well enough thought out to deliver the needs of a growing population in Greater Cambridge. There are aspects such as Cambridge East, Cambourne North and Cambridge North-East which make strategic sense. However, the proposals for the green belt releases south-east of Cambridge are confused, piecemeal and fail to represent a holistic approach to sustainable development. Likewise, Grange Farm, Abington is ill thought out and will become a mainly car commuter settlement with its proximity to the A11 / M11 and ease of access south towards London and it is very unlikely that the majority of new residents would work in the southern research cluster.

This Local Plan should be delivering a comprehensive plan for the south-east of Cambridge and the areas on the edge of Cherry Hinton, Queen Ediths and the Biomedical Campus. A one-off targeted review of the inner green belt boundary coupled with securing the land to provide a large, accessible area of nature rich downland from Cherry Hinton and Queen Ediths to the Gog Magog Hills would set the long-term boundary to Cambridge in the south-east, while delivering the nature-rich downland and strategic accessible natural greenspace that Cambridge is missing. This would complement the similar approach taken at Trumpington Meadows and Clay Farm nearly 20 years ago and deliver a legacy in sustainable development.

The reality is that the Cherry Hinton and Gog Magog downs will not be delivered unless the landowners' development aspirations are included in the Local Plan. A small, targeted extension to the Peterhouse Business Park, coupled with additional development either side of Wort's Causeway (20-30 Ha of inaccessible Green Belt) would deliver 150-200 Ha of new accessible nature-rich countryside to support the growing city and make up for the historic deficits in provision of strategic natural greenspace. With Wandlebury and Magog Downs and buffering of and connections to Nine Wells LNR this would provide the sub-regional natural greenspace missing from the Greater Cambridge area, right on the doorstep of Cambridge and

in keeping with the vision for an internationally renowned biomedical campus. It would also contribute to delivering one of the top priorities for nature recovery in and around Cambridge. This needs to be undertaken now, not at some undefined point in the future. The opportunities are partially shown in figure 1 below, though we would be happy to provide a more detailed map.

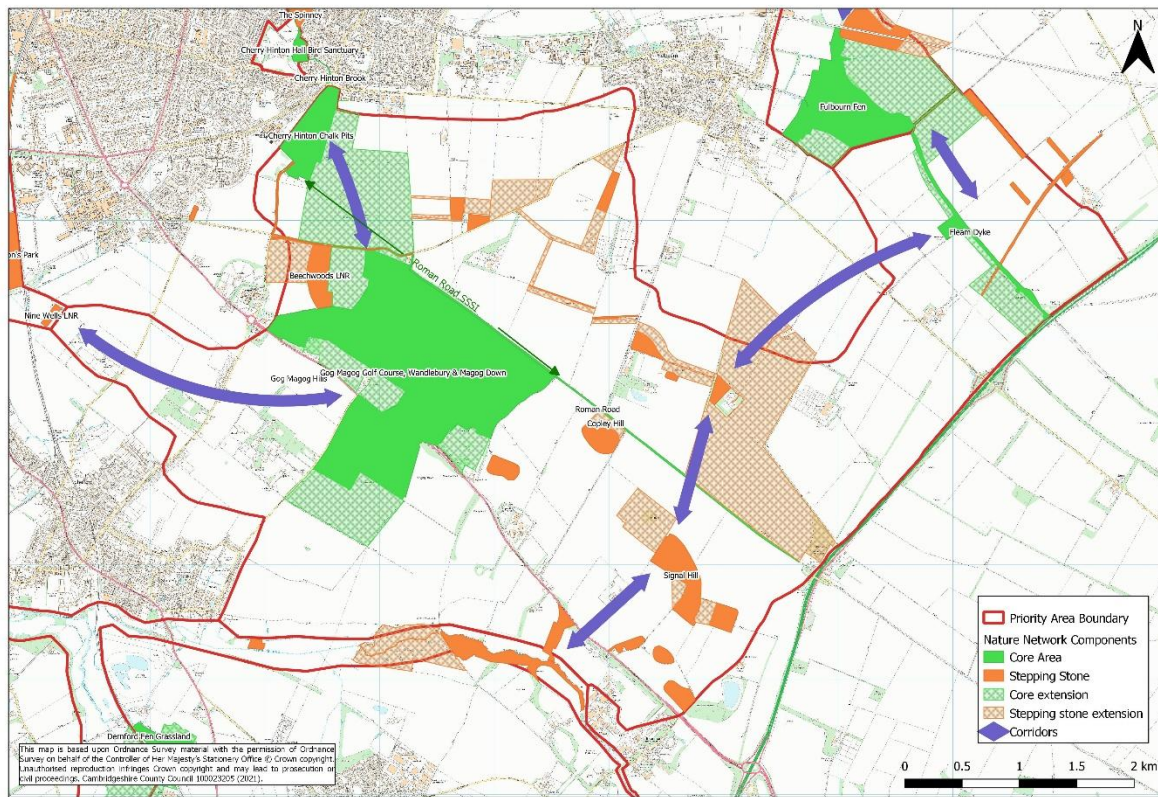


Figure 1: Cambridge Nature Network priority nature recovery opportunities in Gog Magog Hills Priority Area

Elsewhere, the new town at Grange Farm, Abington is too large and inherently unsustainable and appears to have been purely placed there to “jump” the Green Belt. This hasn’t worked with places like Bar Hill, which are almost completely car dependent. While a new village in this location might be justified a town that is too small to deliver most of the services residents will need and will result in high levels of out-commuting and car visits for leisure and recreation is unsustainable. While a public transport hub is planned, and the development is nominally designed to serve the southern research cluster, the reality is it is located adjacent to the A11 and would provide an ideal location for commuting to the south towards London or east. Unless the housing is only for employees who work at Granta Park, Babraham or Hinxton it is hard to see how it won’t be an unsustainable 20th century car dominated commuter settlement.

There must also be concerns as to the delivery of parts of Cambridge North-East if the sewage treatment works cannot be moved. The planned sustainable development of the south-east edge of Cambridge would contribute housing and employment that might not be delivered here or could help replace some of what is proposed at Grange Farm, Abington, to achieve a smaller and more appropriately sized development.

Policy BG/BG: Biodiversity / Geodiversity

The Wildlife Trust strongly supports this policy subject to the changes set out below.

1. All development must deliver statutory biodiversity net gain (BNG), providing a minimum of 10% BNG against the baseline, unless exempt under the Environment Act 2021, to be provided on-site ~~in line with guidance where this is feasible and effective.~~
2. Major development in Greater Cambridge must provide a minimum 20% biodiversity net gain (BNG), (unless exempt under the Environment Act 2021). ~~A net gain of at least 10% to should~~ be provided on-site where this is feasible and effective. ~~Where 10% net gain is not achievable on-site net gain should be provided off-site in line with Greater Cambridge published guidance. Any net gain beyond 10% can be provided on or off-site in line with Greater Cambridge published guidance.~~
3. Where onsite options for BNG have been evidenced to be exhausted as agreed with the Local Planning Authority, BNG should be delivered offsite via the purchase of biodiversity ~~credits-units~~ from a registered strategic habitat bank provider as listed on the Defra Biodiversity Gains Sites Register, or through a bespoke scheme on a site registered on the Defra Biodiversity Gains Sites Register, or through the purchase of statutory biodiversity credits, or a combination of the above. The Local Planning Authority will encourage delivery of replacement habitat within areas identified within the Cambridgeshire and Peterborough Local Nature Recovery Strategy priority areas.
4. Planning applications subject to mandatory BNG will require a biodiversity plan to be submitted to, and approved in writing by, the LPA prior to commencement of development.
5. Habitat enhancement and creation measures, including their establishment and ongoing management and monitoring, will be prescribed and secured through conservation covenants, planning conditions and / or obligations.

Protection of biodiversity and geodiversity

6. For proposals where development may affect biodiversity (including sites of biodiversity importance, habitats and species of principal importance) or sites of geodiversity, prior to the determination of an application, applicants will provide survey information and site assessment that is proportionate to the likely severity of impacts.
7. Development proposals which have a direct or indirect adverse effect on sites of biodiversity or geological importance ~~(as identified on the Policies Map)~~ ~~(or other sites which meet the published criteria for selection)~~, will not be permitted. Exceptions will only be made where the benefits of the development significantly outweigh any adverse impacts. In such cases where development is permitted, proposals must demonstrate that the mitigation hierarchy has been implemented, and the intrinsic natural features of particular interest must be safeguarded and enhanced having regard to:
 - a. The international, national or local status and designation of the site; and,
 - b. The nature and quality of the site's features, including its rarity value; and,
 - c. The extent of any adverse impacts on the notified features; and,
 - d. The likely effectiveness of any proposed mitigation with respect to the protection of the features of interest; and,

- e. The need for compensatory measures in order to re-create, on or off the site, features or habitats that would be lost to development.
8. Development must protect and enhance irreplaceable habitats within Greater Cambridge. Development negatively impacting irreplaceable habitat will not be permitted unless wholly exceptional circumstances are demonstrated, and a bespoke compensation strategy is provided.
9. Development will mitigate evidenced recreational impacts on designated biodiversity and geodiversity sites, including providing Strategic Alternative Green Space for development proposed within Natural England's Impact Risk Zones for Sites of Special Scientific Interest.

Supporting Text comments

Paragraph 4: WT comment - On site delivery will often be poor quality, suffer from disturbance and pollution, and cannot be effectively secured for 30 years. This increases the likelihood that developments will deliver less than 10% net gain or result in a biodiversity loss. **Therefore, additional text should be added to explain this and why off-site delivery may be the best option, particularly if it is well-related to and relatively local to the development.**

Paragraph 5: WT comment – The text partially addresses the above point in terms of GI but doesn't cover the potential for biodiversity losses or gain below the required thresholds for on-site delivery.

Paragraph 11: WT comment – Text on SSSIs, **remove “normally” or change to “only in exceptional circumstances”**

Paragraph 19: WT comment – Change text as British Standards (BS42020: 2013) is not published by Natural England and it needs to refer to successor not predecessor. “Submitted documentation should be produced having regard to ~~the~~ best practice guidance ~~published by Natural England for example British Standards on Biodiversity~~ (BS42020:2013 or ~~predecessors~~ successor), **and** should demonstrate that the mitigation hierarchy has been implemented and should evidence how the intrinsic natural features of particular interest are to be safeguarded or enhanced.”

Policy BG/GI: Green and Blue Infrastructure

The Wildlife Trust strongly supports inclusion of a GI policy and the reference to the Building with Nature standards and the incorporation of the Greater Cambridge strategic green infrastructure initiatives. We commend the extensive work undertaken by Greater Cambridge to assess green infrastructure needs. However, we are concerned about several aspects of the policy though acknowledge that it is still a work in progress.

While the policy may help to ensure that most major developments provide high quality GI on-site, there is a significant risk that it will not contribute meaningfully to the delivery of strategic GI across the Greater Cambridge area. We are very concerned that the policy by itself will not deliver strategic GI in the right locations and will fail to match needs without proactive policy and site allocation decisions elsewhere in the local plan. It is simply not clear at present how the policy aspirations will be delivered.

The Cambridge Nature Network sets out a clear vision for where strategic green infrastructure and nature recovery can take place. It identified four areas as the priorities for the provision of strategic green infrastructure and land for nature recovery:

1. To the south and east of Cambridge (Gog Magog Hills to Cherry Hinton downland zone);
2. West of Cambridge (Coton Countryside Reserve);
3. North & East of Cambridge at the southern end of the National Trust Wicken Fen Vision area around Anglesey Abbey; and
4. North of Cambridge (extension to Milton Country Park).

This local plan must facilitate delivery of the strategic GI required through both policy and appropriate site allocations now. Accessible natural greenspaces are at capacity and delivery of additional capacity in all areas north, south, east and west of Cambridge is required immediately to address this issue and remove / avoid damage to nature sites including SSSIs.

There must be clear funding mechanisms and or enabling development in the right locations to ensure that the Cambridge Nature Network and other strategic green infrastructure is provided to support the proposed population growth. Without a proactive approach, the local plan will not meet the strategic GI needs and will therefore not deliver sustainable development. The best locations to provide strategic GI for Cambridge are on the fringes of the city, but the landowners are unlikely to make land available for strategic GI unless it is related to their own development proposals. The unfortunate reality is that there may be a need for enabling development to unlock the land in the right locations to meet the strategic GI needs of the growing city and deliver a sustainable local plan.

Some of the proposed locations for major new development are not well located to deliver the strategic green infrastructure Cambridge needs in the right locations. The proposed development at Grange Farm, Abington is a case in point. The development is too small to deliver significant strategic GI but large enough to add to the unsustainable pressures on nature sites and county parks already occurring. While this development may be required to provide funding for strategic GI, the reality is that potential providers will not be able to acquire the land required south and east of Cambridge, due to current ownership and the development aspirations of those owners.

At this stage we believe that the local plan has failed to address the strategic GI requirements of the Greater Cambridge area and will not do so unless land can be secured in the right locations, through a mixture of policy and enabling development. We acknowledge that the Councils are aware of this as noted in paragraph 5.77. However, addressing this missing aspect of the local plan will be critical in determining whether the local plan is sustainable or not. This may even require further carefully targeted release of green belt land to deliver nature recovery and strategic natural greenspace in the best locations, and this is allowed for in national green belt policy objectives where it delivers *“improvements to local infrastructure...and the provision of new or improvements to existing green spaces that are accessible to the public.”*

On other aspects of the GI policy, we would like to understand more about how the use of the Urban Greening Factor and the proposed thresholds will help deliver sufficient quantity and quality of GI. We understand how this will be appropriate for urban developments within Cambridge City, as the factor has been developed for use in cities and used extensively elsewhere across the world. However, we question whether the Greening Factor is the right measurement for standalone new settlements or more rural development locations.

The Natural England Urban Greening Factor User Guide (2023) specifically states in chapter 3 that, “UGF is a planning tool that focuses on the greening of urban areas, and it is recommended that it is applied through planning policy to areas and districts that are predominantly urban or suburban in character.” Therefore, its use for major developments within Cambridge City is wholly justified, however, we are concerned that its application to developments elsewhere in Greater Cambridge may not be appropriate. There is a danger that the chosen thresholds may actually deliver less by way of GI than an approach that e.g. identifies a % of development footprint to be devoted to GI? There is therefore likely to be a need to better specify where and when the Urban Greening Factor (UGF) will be applied. Elsewhere within the User Guide the Urban Greening Factor score of 0.4 for predominantly residential developments is described as a “*minimum benchmark*” rather than a target and a minimum UGF score of 0.5 is suggested for greenfield development. **The current policy should therefore be changed to include an urban green factor of 0.5 for greenfield developments or perhaps better, only applied to the urban area of Cambridge.**

We also need to understand more about how all development will contribute proportionally to the strategic green infrastructure required to support sustainable development within Greater Cambridge area. Provision of GI across the Greater Cambridge area has fallen well behind that required to support population growth over the past 20 years. While most strategic developments have provided sufficient strategic GI to meet their own needs, these have only accounted for approximately 50% of the population growth, and the other 50% of development has not contributed to the needs of the growing population. Cambridge is well known for not having large areas of accessible downland, forest or commons. The next local plan will need to make up for these deficits as well as provide sufficient GI for the proposed additional population growth. **All development should contribute to strategic GI and therefore the local plan must include strategic GI within a CIL requirement for new developments.** While funding for open spaces and sports pitches is often secured through local plans, the natural environment and natural greenspace has traditionally been missed or under-provided for.

Green Infrastructure Emerging Strategy, Standards & Evidence Base Documents

There is a lot of good information in the two reports, most of which we can fully support, including the majority of the proposed GI standards. However, there are several areas where the documents need to be amended.

The reports identify that there is currently 8.7 Ha of accessible greenspace per 1,000 population across the Greater Cambridge area and set out a policy to maintain this minimum level of provision in relation to future population growth. However, from reviewing the evidence it is unclear where this figure actually comes from, and various maps appear to show some large areas of land as green infrastructure which are neither high quality nature sites nor accessible greenspace. It must include an element of accessible natural / semi-natural greenspace, but from a review of the various linked GI reports I have not been able to find the source reference for this calculation. This is critical to understand whether the figure is accurate and to understand how it was calculated. There is a good chance that the current level of provision is over-stated, which has implications for both policy and funding.

The reports also refer to the Greater Cambridge area exceeding the Fields in Trust recommended standard of 3 Ha / 1,000 population of natural greenspace. However, this is not an appropriate standard for the Greater Cambridge area. This figure might be appropriate for many other cities and towns that have large areas of high quality, biodiverse, accessible

countryside in their hinterland including areas of downland, moorland, forest or coast. These are often designated as National Parks or National Landscapes with good access provision. However, the Greater Cambridge area has none of these and therefore requires a much higher level of provision of strategic natural greenspace.

A further consideration is that the provision of accessible natural greenspace is significantly less than required as it is not sufficient to prevent increasing impacts from recreational use of nature sites across Greater Cambridge. The levels of strategic natural greenspace provided over the past 20 years has been insufficient overall (though some individual large development allocations such as Trumpington Meadows, Clay Farm, Cambourne and Waterbeach will meet their own needs, most developments have not).

Therefore, there is a question as to whether the 8.7 Ha per 1,000 population is either an accurate assessment of quantity or sufficient as the target for the **Overall Accessible Greenspace Area-wide Standard**? Does this need to be increased to address the impacts on nature sites from unsustainable recent growth and predicted future growth? Alternatively, should a set of specific and deliverable new strategic natural greenspace sites be brought forward through the Local Plan process to address and mitigate the damage from recreational impacts at existing nature sites and the capacity issues at Country Parks such as Wandlebury and Milton? Whichever approach is taken, the Local Plan must include proactive measures and deliver the strategic natural greenspaces that is required for place making and sustainable development, in addition to the local and urban green infrastructure to be delivered on-site through new developments.

The Wildlife Trust welcome and fully supports the inclusion of the proposed **Overall Nature Recovery Area-wide Standard**. The standard and justification are set out in paras 3.2.24 and 3.2.25 of the Emerging GI Strategy & Standards Document. However, we do not support the current wording as it is not clear. We suggest the following revision to the proposed standard, with similar changes to wording in para 3.2.25:

“Target of 100% increase in the ~~proportion of area of natural / semi-natural~~ GI that is designed and managed for nature recovery across the Greater Cambridge area over the Local Plan period.”

The Wildlife Trust welcomes the commitment to undertake further work on a SANGS (Suitable Accessible Natural Greenspace Standard).

With respect to costs and implementation, it will be essential to factor in the land acquisition costs in calculating the overall figures for provision of strategic natural greenspace. At present only site creation and management costs over 30 years have been taken into account.

Finally, within the **GI Supporting Evidence Report** Appendix D includes an analysis of how the Accessible Natural Greenspace Standard is met and identifies areas of deficiency. The Wildlife Trust notes the deficiency in the provision of a **Sub-regional Natural Greenspace (500 ha)** for the whole of the Greater Cambridge area and the deficiency in provision of **District Natural Greenspace (100 ha)** across most of the area. The Cambridge Nature Network report identified the opportunities to address these deficiencies in three areas to the south and east, west and north-east of Cambridge. **It is essential that the Local Plan makes specific provision, if necessary allocating land, to deliver the strategic natural greenspace that will meet the identified needs.**

Policy BG/EO: Providing and Enhancing Open Spaces

We welcome aspects of this policy, and the potential inclusion of an accessible green space standard per 1000 population, if it is set at a high enough level to address historic deficits in provision as well as future needs. This should also include an accessible natural greenspace standard, in addition to the calculated parks, open space and recreation space standards adopted. It may be that the accessible natural greenspace standard is separated and included within the Green Infrastructure policy instead. A natural greenspace standard will form part of strategic GI provision and the provision of Suitable Alternative Natural Greenspace where new developments are creating adverse recreational impacts on nature sites.

Policy BG/TC: Tree Cover

The Wildlife Trust generally supports this policy but the 15 metres buffer zone will be insufficient where ancient woodlands are close to major new developments. In these cases a buffer of 500 metres to 1 Km will be required to protect the ancient woodlands from the impacts of cat predation and recreational disturbance effects from people and dogs.

Policy BG/RC: River Corridors

The Wildlife Trust supports this policy except bullet point (e)j, which must make clear that a Cam Valley trail should not follow the river bank or be located in the floodplain along the whole length of the river to protect river and floodplain wildlife from excessive disturbance. Although the policy refers to the need for balance there is no supporting text to set out and describe the balance that must be struck between river biodiversity and public access.

Policy I/ID: Infrastructure Delivery

The Wildlife Trust welcomes recognition in the supporting text of the need to provide parks, open spaces and land for biodiversity. However, this would be better cast as providing strategic and local green infrastructure. Further the policy and supporting text must be re-worded to explicitly include strategic green infrastructure to support the biodiversity and green infrastructure policies. We make the following suggestion for an addition to the first paragraph of the supporting text:

Infrastructure is an all-encompassing term that includes but is not limited to roads; public transport; active travel; utilities; the public realm; community safety; public art; facilities and services such as schools, libraries, healthcare, waste management, community centres and halls, cultural and faith facilities as well as parks, open spaces, playgrounds, indoor and outdoor sports facilities, natural greenspaces, biodiversity, and burial spaces.

The current iteration of the Infrastructure Development Plan (IDP) appears to have used the inadequate Fields in Trust standards to assess green infrastructure provision and fails to take account of the quantity of strategic green infrastructure required to address historic deficits in provision, deliver nature recovery and contribute towards sustainable development. **While we appreciate that the IDP policy and supporting text acknowledges that work still in progress to develop the GI standards, it is essential that the final documents are fully aligned.**

The IDP acknowledges that the strategic green infrastructure needs for the Local Plan are still in development. Table 17.2 lists a suite of strategic green infrastructure projects, that if delivered would contribute towards sustainable development and nature recovery. **The Wildlife Trust supports inclusion of the initiatives identified in table 17.2 within the IDP.** These must be delivered which will require sufficient financial contributions secured from new developments.

However, the IDP fails to acknowledge that one of the major constraints to delivering strategic green infrastructure is land availability in the right areas. The reality is that land assembly for many of the strategic green infrastructure initiatives, particularly on the edge of Cambridge, is dependent on private landowners who often also have their own long-term development aspirations. Unless these are realised at least in part, the land will not be made available for strategic green infrastructure and the cost of purchase is likely to be prohibitively expensive.

There are inconsistencies across the various Green Infrastructure documents (Green Infrastructure Emerging Strategy, Standards & Evidence Reports, the Infrastructure Delivery Plan and the Draft Planning Obligations SPD regarding the costs of providing strategic green infrastructure.

In many places these are too low, e.g. the Planning Obligations SPD quotes a price for agricultural land as £20k per hectare, when it is more likely to be nearer £30k / Ha on average, and potentially significantly more for sites close to Cambridge. Likewise, the quoted capital costs while appropriate for many types of habitat creation, do not cover provision of surfaced paths or other such facilities where these may be required. Table 5.1 showing the current GI contributions per dwelling in South Cambridgeshire are way too low to actually meet the cost of what will be required. The costs suggested in table 4.2 of the Emerging Strategy & Standards document for provision of natural greenspace of £17 per m² would equate to approximately £1,700 for an average three bed dwelling (compared to £1,279 in the draft Planning Obligations SPD). **It is essential that the GI policies and Infrastructure policies, including the final Planning Obligations SPD are consistent and secure sufficient financial contributions from all new development to meet the strategic natural greenspace needs of the area.**

Climate Change

The Wildlife Trust supports the emphasis on climate change, including reducing greenhouse gas emissions and mitigation and adaptation measures. We support the following policies:

CC/SD: Sustainable Development & the Climate Emergency

CC/DC: Designing for a Changing Climate

CC/NZ: Net Zero Carbon New Buildings

CC/CE: Supporting a Circular Economy & Sustainable Resource Use

CC/CS: Supporting Land-based Carbon Sequestration & Carbon Sinks

We also support the following policies but have additional observations regarding their content or the supporting text.

CC/WE: Water Efficiency in New Developments

CC/IW: Integrated Water Management, Sustainable Drainage & Water Quality

CC/FM: Managing Flood Risk

The Wildlife Trust fully supports all of the water policies particularly those elements seeking to re-use water on site (grey water solutions), protect ground and surface waters from pollution, increase infiltration to the ground (of clean water) and incorporate natural solutions and biodiversity into the design of water infrastructure.

We fully support policy CC/WE and the proposed water efficiency standards and measures. Our chalk aquifer and chalk streams are under extreme pressure and being damaged as a result of over-abstraction, low flows and poor water quality. Significant changes in our collective use of water and reductions in water use are required across all sectors of society.

However, the Wildlife Trust remains extremely concerned that the proposed levels of growth are unsustainable in terms of water resources, and that the proposed measures to increase supply (Grafham pipeline and Fens Reservoir) will come too late and result in at least another 10 years of damage to our chalk streams.

The Wildlife Trust fully support bullets 1 & 2 of policy CC/IW.

We also support policy CC/FM but would note that there is potential for increased flows in our chalk streams and higher ground water tables from a restored aquifer towards the end of this Local Plan period. How do the policies and calculations of flood risk align with healthier river systems with more natural rather than low flows? Should the starting point for assessing flood risk be to use the future restored river system with more natural flows as the starting point for analysing flood risk management?

CC/RE: Renewable Energy Projects & Infrastructure

The Wildlife Trust supports this policy including bullet point 1b to protect biodiversity, and in particular welcomes bullet point 5 which requires the retention of any biodiversity net gain at the end of (decommissioning) of a renewable energy project such as a solar park. We also welcome the supporting text in relation to loss of agricultural land and the balances that must be struck between different competing land uses. Covering too much land in solar panels could significantly compromise nature recovery to address the biodiversity crisis, by reducing the land available for nature restoration and pitting food production and nature recovery against each other.

Site Allocations:

S/NEC: NE Cambridge

The Wildlife Trust is extremely concerned that the scale of development is not achievable and that there doesn't appear to be a plan B to deliver the 5,500+ homes that may not come forward if the existing CWWTP is not re-located.

The Wildlife Trust also believes that due to the density of the proposed development it will be essential for there to be a significant contribution to off-site strategic green infrastructure north and east of Cambridge. The current policy wording fails to acknowledge the need for this or set out a policy mechanism for the NE Cambridge site to contribute to meeting the GI needs of the new population.

S/CE: Cambridge East

The Wildlife Trust supports the policy recognition given to biodiversity and green infrastructure issues. The policy represents a good framework to avoid adverse impacts on nearby high-value

nature sites and to provide high quality green infrastructure including off-site strategic natural greenspace.

S:/WNT: Land North of Waterbeach

While welcoming the Strategic Enhancement Area between the new town and Denny Abbey, the policy needs to be more explicit in identifying this area for provision of strategic natural greenspace to serve the new development. The current extent of on-site green infrastructure will not be sufficient or attractive enough to support the recreational needs of the new population and will therefore likely result in displacement of recreational pressure to nearby designated nature sites.

The policy must be changed to incorporate delivery of strategic green infrastructure within the strategic enhancement area in accordance with the masterplan SPD document previously prepared by SCDC, but which as yet hasn't been fully reflected in the policy for this site.

S/BA: Bourn Airfield New Village

The Wildlife Trust has no comments on this policy, which reflects previously agreed policy.

S/CBN: Cambourne North

The policy incorporates many of the natural and ecological considerations necessary for development of a sustainable new town. However, there are areas where this will be extremely challenging, including loss of functional foraging habitat of Barbastelle bats and avoiding impacts on the irreplaceable ancient woodlands. While some of these challenges could be met with amendments to the wording of the policies or supporting text, the reality is that it will not be possible to avoid or mitigate on site all impacts on the ancient woodlands and internationally important Barbastelle bat population. Further, the overall spatial framework does not demonstrate compliance with some of the nature and GI policy wording.

The overall spatial framework goes 90% towards create a connected ecological and green infrastructure network. The policy correctly acknowledges the potential for adverse impacts on land that is used for foraging by Barbastelle Bats and is functionally linked to the internationally important maternity roost at Wimpole. While the policy includes a lot of good text around what would be required to minimise and mitigate for impacts, it does not provide connectivity from Elsworth Wood and Knapwell Wood ancient woodlands to the south and south-west towards Wimpole. This is a major failing. To provide proper landscape connectivity for the Barbastelle bats will require strategic green infrastructure corridors across the A428 and East West Rail (EWR), including potentially a green bridge "dark corridor". However, even with these it will not be possible to include complete dark corridors particularly across the A428. From a green infrastructure perspective, the spatial framework must show a "dark" corridor from Elsworth Wood to the south-west and from Knapwell Wood to the south between Cambourne and Bourn Airfield. It should also show a green corridor east-west linking the Knapwell Wood and Elsworth Wood corridors, as well as a much wider green corridor north from Knapwell Wood.

While the inclusion of buffer zones and a strategic green infrastructure network will provide some mitigation for impacts on the ancient woodlands within Cambourne North, they will not be sufficient to avoid recreational impacts on the woodlands, which may be significant.

The policy and supporting text should therefore acknowledge that it will not be possible or will be highly challenging to avoid or mitigate these impacts on-site and therefore there is a high likelihood that compensatory measures will be required to address the impacts on the ancient woods and Barbastelle bat population.

The Wildlife Trust has the following comments on specific sections of the policy wording (~~Deleted text~~ / Additional text):

8. Cambourne North contains and is close to a number of nationally significant ecological and historic assets, including Ancient Woodlands, County Wildlife Sites, and an extensive network of archaeological remains and features. The future layout of the town will consider these assets, seeking to avoid adverse impacts where possible and identifying and implementing measures that mitigate any impacts but also deliver compensation and enhancement wherever possible, including creating an extensive network of ecological corridors.

11. The Wildlife Trust fully supports this section of the policy. The Strategic Enhancement Area should not comprise a “forest” with wall-to-wall trees, but should be a mixture of new woodlands, scrub, meadows with hedgerows, ponds and other wetland features and continued nature friendly farming. The nature-friendly farming practiced at RSPB Hope Farm should not be compromised and should be replicated elsewhere within the Strategic Enhancement Area. We therefore acknowledge and support 11b (i), (ii) & (iii).

22. The Wildlife Trust generally supports this part of the policy. However, it should be acknowledged that it will not be possible to prevent access to the ancient woods (bullet 22a) and this part of the policy should be reworded to concentrate on minimising and fully mitigating or compensating for impacts. This is because it will not be possible to prevent all access to the ancient woodlands and that anything short of a solid or metal and spiked fence is unlikely to prevent future access. The best solution for protecting nature sites across the wider area, may be to provide well-considered access such as a surfaced path through each ancient wood. This could encourage better use of the strategic greenspaces provided at Cambourne North and more visits, otherwise new residents will go elsewhere and drive to visit “bluebell” woods. The key aim of this part of the policy should be to seek to minimise adverse impacts on Elsworth Wood and Knapwell Wood, through design of the strategic green infrastructure, surfaced access routes, signage and on-site ranger actions. We therefore suggest the following wording for 22a.

22a. Ensure that public access to the ancient woodlands and SSSIs ~~are kept free from public access is effectively and well managed~~ to limit impacts of recreational disturbance;

The Wildlife Trust fully supports parts 22b and 22c of the policy.

23-26. The Wildlife Trust supports these four bullet points, but please note our comments above regarding the need for landscape connections to the south and south-west towards Wimpole. There is also likely to be a need to ensure woodland on both sides of major infrastructure such as the A428 and East West Rail, with green bridges and a dark corridor.

27-31. The Wildlife Trust supports all of these bullet points.

32. The Wildlife Trust strongly supports this bullet point and recognition of the need to protect the ancient woodland SSSI. However, this part of the policy should also include reference to other nearby SSSIs that could be adversely impacted from recreational pressures if Cambourne North is not designed well. Other sites likely to experience recreational pressures are Wimpole and Eversden Wood, Kingston Wood, Waresley & Gransden Woods and Hardwick Wood.

33. The Wildlife Trust fully supports the proposed holistic ecological master planning approach.

S/CBC: Cambridge Biomedical Campus

The Wildlife Trust supports point 14(b) of the policy and the principles in bullet 17(c). The Wildlife Trust fully supports effective buffering of both LNRs at Nine Wells and Beechwoods. The field below (to the north) of Beechwoods LNR is part of the priority area to create a new strategic downland (accessible natural greenspace) area from Cherry Hinton Chalk Pits to Beechwoods and Gog Magog Hills. The fields immediately to the east of Nine Wells are also essential to buffer this site and protect the chalk springs.

The area south of the Biomedical Campus is known as a hotspot for farmland birds. The proposed landscape enhancement and accessible greenspace provision will not provide suitable compensation for the loss of farmland bird populations. These will need off-site areas of nature friendly arable farming with a secure long-term future and not typical greenspaces designed for public access. The policy doesn't adequately provide for this.

However, we are extremely concerned overall that the proposed landscape buffer is the wrong solution in the wrong place in terms of delivering nature recovery and ecological enhancement in line with the Cambridge Nature Network and the Greater Cambridge Green Infrastructure Opportunity Mapping. It fails to deliver the strategic natural greenspace that the City requires and demonstrates a lack of long-term vision to deliver the Cambridge Nature Network. A corridor from Beechwoods LNR to Nine Wells LNR around the edge of the Babraham Park & Ride site is not the right solution and represents a second-rate ecological opportunity. Looking long-term, is this the right location for new greenspaces or is there a case to slightly extend the developments north and south of Wort's Causeway to deliver larger areas of higher quality strategic greenspace that deliver more for nature from Cherry Hinton Chalk Pits to the Gog Magog hills?

The Wildlife Trust believes that now is the time for a comprehensive approach to long-term planning for development on the south-east edge of Cambridge to create a one-off targeted Green Belt release in appropriate locations and to deliver a regionally significant *sub-regional greenspace of 500 Ha in size*", comprising a large accessible area of chalk downland and associated habitats from Cherry Hinton to Beechwoods and Wandlebury, and on towards Magog Down. Targeted release of green belt land in more than one location will facilitate the land assembly required to deliver the strategic green infrastructure in the best location. Creation of the sub-regional greenspace will set the long-term limits of growth of Cambridge to the south and thus create a permanent green belt boundary. It will also deliver high quality habitats alongside the accessible greenspace and countryside that Cambridge desperately needs.

S/GF: Grange Farm, Abington

The Wildlife Trust is very concerned that this proposed allocation does not represent a sustainable development and in spite of proximity to the biomedical campus and proposed park & ride / guided busway schemes, will become a car-based commuter settlement, with easy access to London to the south.

The proposed settlement is too small to be a sustainable new town or to deliver the scale of facilities on-site to prevent significant additional car journeys. Further the strategic enhancement area will be too small to meet strategic green infrastructure needs on-site. This will therefore result in displacement of recreational activities to well established sites elsewhere that are at capacity and will result in damage to nature sites elsewhere. Even if the development provided significant financial contributions for strategic green infrastructure, it is highly unlikely that providers would be able to acquire the land required in the right places, as

land assembly for strategic green infrastructure on the edge of Cambridge will ultimately depend on the landowners getting at least part of their own development aspirations in return for providing the land for strategic green infrastructure. The reality is that this development will place unmitigated additional pressure on Wandlebury, Magog Down and various SSSIs within the catchment of this new settlement and not just the Roman Road SSSI.

There also has to be significant questions as to where water supplies will come from to meet a development of this scale in this location, without further undermining groundwater supplies in the chalk aquifer and damaging the River Granta.

The Wildlife Trust therefore does not support this allocation, unless the Local Plan also includes deliverable measures to create the strategic green infrastructure that would be required to mitigate and compensate for this development. It may be that a smaller village sized development in this location coupled with some targeted green belt releases on the south-eastern edge of Cambridge would deliver the strategic green infrastructure needs of this development and any additional development on the edge of Cambridge, help address the current deficits in strategic green infrastructure, while also delivering one of the top priorities for nature recovery in the Cambridge Nature Network.

The Wildlife Trust has the following comments on specific sections of the policy wording (~~Deleted text~~ / Additional text):

11. Point d refers to ensuring appropriate measures are implemented to minimise recreational disturbance at the SSSI. It is not just the Roman Road SSSI that will come under pressure from this allocation but other SSSIs and CWS in the wider area could also be threatened. Further the policy should be seeking to avoid impacts arising on SSSIs and other nature sites, not just minimise them. The Wildlife Trust therefore suggests that bullet d is reworded:

d. Ensuring that appropriate measures are implemented to ~~minimise~~ avoid recreational disturbance and pressures on ecology at ~~the nearby SSSIs and other nature sites~~;

Martin Baker
Conservation Manager
23rd January 2026