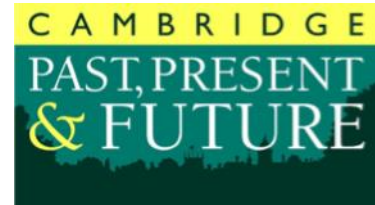


Steven Faser-Lim
Greater Cambridge Share Planning Service



Submitted online.

24/01/2022

Dear Steven

Cambridge Past, Present & Future
Wandlebury Country Park
Cambridge CB22 3AE
Phone 01223 - 243830
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Response to 21/05476/FUL: Hybrid application comprising Parcel A: outline application for commercial floorspace, Parcel B: full application for habitat creation with restricted public access, Parcel C (the lakes): full application for opening of the site to public access for passive recreation and ecological enhancements at Land South Of Coldhams Lane Cambridge.

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxtton Watermill.

CPPF responded to the previous application which was withdrawn. We have looked the revisions made in this application but still consider that there remain matters of objection.

In summary we object to

- Insufficient detail on how the lakes will be managed and funded for wildlife and recreation,
- The funding being only proposed for 25 years but should be for in perpetuity,
- The assessment of Biodiversity Net Gain,
- Insufficient evidence that the development will not have a detrimental impact on wildlife; and
- The exclusion of part of the lake from the application site boundary.

Management and funding

As an owner and manager of country parks we have significant knowledge in the management and funding of public green spaces. One of the key concerns for CPPF is ensuring the proper provision for the successful long-term management of the environment and public access enhancements offered, particularly at Coldhams Lakes and the land at Parcel C.

In the Planning Statement accompanying the revised application it is claimed that there is now:

'Greater clarity to the intended delivery and the management of the Lakes, being to form the new Country Park and for it to be available for public use prior to the first occupation on Parcel A; a sinking fund provided through the s106; annual maintenance payments for up to 25 years through the s106; a cascade approach to the management whereby it would be first offered to the City Council, then to a local community or charitable

trust (to be selected with the endorsement of the City Council); or to fallback to a private management company to manage the Lakes according to a management plan to be first agreed with the city council.'

However, there is still no detail of the exact management provisions that will be required and the sums of money likely to be involved. The challenges for the successful management of the site are considerable and, if there are not sufficient funds available to adequately address these issues then there will be a high risk of serious accident, unacceptable impacts on the local community and loss of biodiversity.

The limitation of 25 years funding is also of concern. CPPF takes the view that as the proposal has resulted in the permanent loss of the City Wildlife Site, the package of environment enhancements should be funded in perpetuity. We are also concerned with the possibility that additional funding might be derived from new on site infrastructure and membership derived from recreational activity on the lakes, both of which could impact on the protection of biodiversity at the sites.

CPPF request that, if the City Council are minded to approve the application, there should be an adequate S106 planning agreement and planning conditions securing a management plan and a business plan for funding, including after 25 years.

If the public has been given access to the lakes for 25 years they will expect that access to continue beyond that period. Is the intention that the land would be transferred after 25 years so that public access could continue? Where would the funding come from to maintain the Lakes as a public green space after 25 years? Answers to these questions are needed in order to understand the likely public benefit arising from the development versus the likely harm.

Biodiversity Net Gain Assessment

The adopted Cambridge City Local Plan Policy 16(g) requires 'appropriate ecological mitigation and/or enhancement measures, as compared to the 2005 Cambridge City Wildlife Survey baseline'. Unlike the previous application, this application has considered and taken into account the 2005 survey based on the site prior to the clearance of Parcel A in 2013. However, this can only be a 'best-fit' approach and the current enhancements offered cannot provide quite the same wildlife value as that which existed 2005-2012. This leads to an inherent difficulty in reviewing the Biodiversity Net Gain Assessment. On this matter we support the representation made by the Wildlife Trust BCN in their response to this application (dated 12 January), that the BNG assessment has downplayed the baseline value of the site, overplayed the value of some habitats to be created and incorrectly used the metric, thus introducing errors in the scoring.

Impact of recreational uses on wildlife

The applicant has considered the value of Coldhams Lakes for wintering waterfowl, but claims that the species composition is unlikely to alter despite a recognised potential greater abundance. This response does not address our concerns about the impact on wildlife. Again, I refer you to the more detailed comments made by the Wildlife Trust BCN that the deep-water lakes are most valuable for wildfowl during extended cold spells when other wetlands in both the UK and near continent are frozen over. The application must be supported by accurate survey work to ensure that the value of the site is not under-represented.

Application Site Boundary

Due to the lakes being in different ownerships, there is an anomaly that part of the eastern lake is excluded from the site to which planning permission is being sought. It is unclear how, should permission be granted, that it, the S106 agreement and the management structure can be properly implemented when it excludes half the body of East Lake, half its southern bank and parts of its eastern bank. All the owners of the lake should be parties to the management plan.

Water Voles

CPPF are concerned that notwithstanding, albeit limited, field signs of Water Voles in the Cherry Hinton Brook and southern edges of the Lakes have been found that they have been scoped out of the Environmental Impact Assessment.

Proximity of commercial development to existing residential properties

It is noted that the application has redesigned the commercial development and increased the landscape buffers to reduce the impact on existing residential properties. However the views of local residents are critical and CPPF considers that these must be taken into account in deciding the acceptability of the impact of the development on their properties.

I trust that you will take our comments into consideration.

Yours sincerely



James Littlewood
Chief Executive