

Cambridgeshire County Council

By Online Planning Register

08/04/2026



Cambridge Past, Present & Future  
Wandlebury Country Park  
Cambridge CB22 3AE

Phone 01223 - 243830  
[www.cambridgeppf.org](http://www.cambridgeppf.org)

### **Response to CCC/26/007/FUL: Creation of Comberton Greenway multi-user route**

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 Hinxton Watermill.

---

Cambridge Past, Present and Future support the principle of greenways. Our responses to pre-application consultations have been to ensure that the scheme is implemented with minimum impact on ecology, heritage and landscape.

We welcome references in the Design and Access Statement to materials and colouring design to blend in with the existing rural aesthetic. We therefore support the use of 'Golden Gravel', 'no dig' paths and bat-friendly solar studs. It is important that these proposals are carried out in the delivery of the Shared use path.

However, we do raise concerns regarding the Biodiversity Net Gain (BNG) strategy.

We note from the Biodiversity Net Gain Report (paragraph 3.5.2) that the applicant (the County Council) is investigating the purchase of habitat units from Lower Valley Farm. While this site is approximately 10 miles from the Comberton Greenway, government guidance explicitly states that off-site BNG units should be sourced as close to the development site as possible to maintain local ecological integrity.

As you are aware, the Statutory Biodiversity Metric utilises a "spatial risk multiplier." This mechanism incentivises local biodiversity enhancement by making units closer to the development more valuable and cost-effective, while penalising distant options with a lower delivery value.

We would like to draw your attention to the Coton Countryside Reserve, which lies adjacent to Coton and is within a few miles of the Greenway. This site offers viable BNG units significantly closer to the impact area than the current proposal.

Should the application be granted, we request that a robust planning condition be attached requiring a hierarchical approach to the procurement of BNG units. This hierarchy should mandate that units be sourced

first, within the immediate vicinity of the development such as within the Harston and Comberton District Ward. If this is not possible to only then looking further afield.

This approach ensures the ecological benefits remain within the community directly affected by the development.

I trust that you will take our comments into consideration.

Yours sincerely

*Sarah Nicholas*

Principal Planning Officer