

Natural Environment

Ecology Consultation Response

Reference Number:	22/02771/OUT
Proposal:	<p>A hybrid planning application for:</p> <p>a) An outline application (all matters reserved apart from access and landscaping) for the construction of: three new residential blocks providing for up to 425 residential units and providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)); and two commercial buildings for Use Classes E(g) i(offices), ii (research and development) providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)), together with the construction of basements for parking and building services, car and cycle parking and infrastructure works.</p> <p>b) A full application for the construction of three commercial buildings for Use Classes E(g) i (offices) ii (research and development), providing flexible Class E and Class F uses on the ground floor (excluding Class E (g) (iii)) with associated car and cycle parking, the construction of a multi storey car and cycle park building, together with the construction of basements for parking and building services, car and cycle parking and associated landscaping, infrastructure works and demolition of existing structures.</p>
Site Address:	Land North Of Cambridge North Station, Milton Avenue, Cambridge, Cambridgeshire
Case Officer:	Fiona Bradley
Responding Officer:	Daniel Weaver
Date:	02/08/2022

Documents Reviewed:

Redline Plan (drawing no. 239-ACME-PLA-S00-0000)

Environmental Statement Volume 1: Main Report, Chapter 9.0 Ecology (RPS, June 2022)

Appendix 9.1; Ecology Survey Report (RPS, February 2022)

Cambridge North: Ecological Design Strategy (RPS, June 2022)

Appendix 9.3: Biodiversity Net Gain Report (RPS, May 2022)

Planting Strategy (west) (Robert Myers Associates, drawing no. 630_01(MP)009 Rev P1)

Planting Strategy (East) (Robert Myers Associates, drawing no. 630_01(MP)010 Rev P1)

Comments:

The site consists of grasslands, ephemeral vegetation, tall ruderal, scrub, woodland areas, hardstanding, and bare ground. The site sits within the Impact Risk Zone of nearby statutory protected sites and may require consultation specifically with Natural England on the grounds of water discharged. The site is adjacent to Bramblefields Local Nature Reserve declared for its mosaic of habitats. There are no non-statutory protected sites in the vicinity that are likely to be impacted directly by the application. Species data shows great crested newts and other amphibians, barn owl and other breeding birds, flowering plants, invertebrates, reptiles, bats, brown hare, badger, otter, water vole, and hedgehog have all been recorded locally.

Appendix 9.1; Ecology Survey Report

There appears to be a fundamental issue with bat, reptile, and breeding bird surveys which have all been scoped out for further survey. All the maps and information provided within the methodology section concerning these species (section 2 of the report) and used as a basis for the scoping out of further surveys appears to be based on a smaller site (6.89 ha quoted in section 1.2.3 of the report) than the total redline boundary (9.88 ha as shown in table 3.1 of the Biodiversity Net Gain Report). There is an area within the redline boundary to the northeast that appears to have not been surveyed either previously or recently for bat, reptile, or breeding bird species.

These surveys and their results form the basis for any environmental impact assessment within the Environmental Statement. Therefore, the applicant must clarify if these species surveys have been undertaken representing the whole 9.88 ha site or if they have only been undertaken in the smaller 6.89 ha site as indicated in section 2. If only the smaller site as shown in section 2 of appendix 9.1 then the applicant must provide the reason they believe this provides a representative survey. Further analysis of either Appendix 9.1 or Chapter 9.0 of the Environmental Statement is redundant until these clarifications can be provided.

For clarity, both vegetation and invertebrate surveys cover the entire 9.88 ha site, not the 6.89 ha site. The Phase 1 map (Figure 9) shows poor, moderate, and good condition open mosaic habitat, dense/continuous scrub, semi-natural broadleaved woodland, amenity grassland, and semi-improved neutral grassland within the area to the northeast not shown in the methods section of the report.

Biodiversity Net Gain Report

The report shows that there will be more than the mandatory 10% biodiversity net gain delivered post construction. This is welcomed. However, there are issues that will need to be addressed prior to acceptance. For example, the baseline area is shown as 9.88 ha, the post construction area of habitat creation 19.11 ha with an additional 0.92 ha of habitat enhancement. Where is the additional 10.15 ha of

biodiversity net gain to be delivered? Is this inside the redline boundary or offsite? The BNG Assessment on page 12 shows that only 1.34 units is to be delivered offsite, with no offsite baseline figure shown. 1.34 units over 10.15 ha would appear to be quite low.

On inspection of table 3.2 there appears to be 11.1344 ha of urban trees to be delivered, this would appear to be an anomaly and likely route cause of the discrepancies. This also represents approximately 59% of all delivered onsite biodiversity net gain; therefore, the overall net gain is likely to be significantly reduced once this anomaly is addressed.

Conclusion:

There is insufficient ecological information to determine this application.

Further analysis of the submitted reports cannot be undertaken as the underlying basis of protected species analysis has not been fully explained. The Survey Report has not acknowledged that the area to the northeast has not been surveyed for bats, reptiles, or breeding birds, and no explanation for the reasons why has been provided within the report. There is a discrepancy between the information regarding the application site area provided in section 1.2.3 of the Survey Report and that of both vegetation surveys and invertebrate surveys in later sections.

The BNG calculations are also very confusing with major discrepancies between areas that are assessed as baseline and areas that are delivered. This needs to be amended to show clearly where each of these created and enhanced habitats are to be delivered, whether onsite or offsite, and with clear plans of all on and offsite delivery.

Recommended Conditions

N/A