Consultancy Unit

Consultation Response Form

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<th>S/0791/18/FL</th>
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<tr>
<td><strong>Proposal:</strong></td>
<td>Relocated railway station comprising platforms, pedestrian bridges, access road, pedestrian and cycle routes, car and cycle parking, with other associated facilities and infrastructure.</td>
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<td><strong>Site Address:</strong></td>
<td>Land between Cody Road and railway, north of Waterbeach, Cambs</td>
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<td><strong>Case Officer:</strong></td>
<td>Mike Huntington</td>
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<td><strong>Comments due:</strong></td>
<td>26/03/2018</td>
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**Ecology**
The application site is an area of arable farmland with semi-improved grassland field margins, wet and dry ditches, hedgerows, and arable fields. To the east is a railway line and Bannold Drove runs north south through the centre of the site. 0.5 km east of the site is the River Cam County Wildlife Site, and the Cam Washes SSSI and Wicken Fen SAC/Ramsar are within 5 km. There are multiple species records form the area including mammals, reptiles, amphibians, birds, invertebrates, and plants.

In support of the application the applicant has submitted an Ecological Assessment (BSG Ecology, February 2018). The report contains results of all ecological surveys that have taken place to assess the application site, suggested how potential impacts will be mitigated, and provided recommendations on what compensatory habitat will be created to achieve a net gain in biodiversity. In general I am in agreement with the report, and I do not believe further surveys will be required to determine this application; however there are some clarifications and amendments to the report which will need to be addressed prior to determination.

**Reptile compensation habitat**
Given the context of the new town of Waterbeach to which this station will be a vital infrastructure facility, and that once development of the new town is underway further development of the station and surrounding area will be necessary; is there a guarantee that the reptile receptor site will remain in tact or will it be subject to further disturbance? If the receptor site is identified for further development then additional translocations of reptiles will be required which would not be considered to follow best practice. Receptor sites should be chosen on the basis of their capacity to provide suitable habitat for the translocated population, and be managed in that manner in perpetuity. Any re-translocation would be considered double handling of the reptiles which is not acceptable. Therefore I will require clarification that the receptor site will remain throughout the development of the new town and expansion of the station in future phases of development, and that it will have connections to the wider landscape to allow for movement of individuals across its boundaries post new town development.

Considering that the receptor site is currently part of an arable field, conversion into suitable reptile habitat will take time. The receptor site must be completed before any translocations can take place; therefore I will require clarification on how the creation of the receptor site will phased with the overall development of the application site, to make sure that it is suitable for reptile translocation prior to any current reptile habitat clearance.

**Local BAP Habitats**
The report identifies that semi-improved grassland is not a Cambridge and Peterborough Local BAP habitat; however field margins are, and as the semi-improved grassland is predominantly part of the field margin network it should be recognised within the report. However I am satisfied that the compensatory habitat to be created in the southern area (reptile receptor site) will help to compensate for its loss. I would suggest; however, that the design of this area includes plants species such as arable weeds to help provide ecological niches that will be lost.

**Net gain in biodiversity**
I welcome the addition of the net gain calculation; however there is no inclusion of the actual calculation or the methodology used to come to its conclusion. As far as I am aware the BIAC uses a spreadsheet to calculate the loss or gain in biodiversity for both habitat and linear habitat. I would suggest that this calculation is included as an appendix along with any modifications made to the algorithm to account for
regional differences in rarity of any particular habitat. Without this information the net gain score of 0.42 has no context.

Summary

Clarifications:
- Will the reptile receptor site remain in perpetuity?
- How will the development phasing be scheduled to make sure the receptor site is suitable for reptiles prior to any translation?

Additional content required
- Acknowledgement that field margins are classified as a Local BAP habitat, and specifics on how its loss will be compensated.
- Inclusion of BIAC (or similar) as an appendix to give context and weight to a 0.42 gain in biodiversity.

Suggested conditions

Once the above clarifications and additional content has been provided, and if the Case officer is minded to give permission to this application I would suggest the following conditions are considered. Based on the size and complexity of the application site and the ecological constraints that have been identified, I would recommend that a Construction Environmental Management Plan (CEMP – Biodiversity) is conditioned within any decision notice issued which will take into account all of the constraints identified in the Ecological Assessment. This will need to include, re-surveys of badgers and otter prior to commencement of habitat clearance, details of timings for vegetation clearance to avoid the breeding bird season, details regarding reptile translocation, and avoidance of harm and disturbance to water voles, bats, and kingfishers. I can suggest the following condition wording is used as a format, with additional details added if the Case Officer believes them necessary.

No development shall take place (including demolition, ground works, and vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

A) Risk assessment of potentially damaging construction activities.
B) Identification of “biodiversity protection zones”.
C) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
D) The location and timings of sensitive works to avoid harm to biodiversity features.
E) The times during which construction when specialist ecologists need to be present on site to oversee works.
F) Responsible persons and lines of communication.
G) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
H) Use of protective fences, exclusion barriers and warning signs if applicable.

The approved CEMP shall be ahead to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

In addition to the CEMP I would also suggest that a Landscape Environmental Management Plan (LEMP) is conditioned as part of any decision notice issued. The LEMP will need to account for all the habitat creation in association with the application, include establishment and ongoing management plans for the reptile receptor site, and planting schedules and planting densities for all native and non native species to be included. I can suggest the following condition wording is used as a format, with additional details added if the Case Officer believes them necessary.

A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and approved in writing by, the local planning authority prior to the commencement of development (including demolition, ground works, and vegetation clearance). The content of the LEMP shall include the following:

a) Description and evaluation of features to be managed.
b) Ecological trends and constraints on site that might influence management.
c) Aims and objectives of management.
d) Appropriate management options for achieving aims and objectives.
e) Prescriptions for management actions.
f) Prescription of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
g) Details of the body or organisation responsible for implementation of the plan.
h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results form monitoring show that conservation aims and objectives of the LEMP are not being met) contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Considering the evidence presented in the Ecological Assessment regarding the movement of bats, particularly along Bannold’s Drove. I would also recommend that a specific condition regarding a suitable lighting strategy is included within any decision notice issued. Within the context of the larger development area, it is vital that a precedent is set to provide dark corridors for foraging bats and other nocturnal species especially along important biodiversity corridors such as Bannold’s Drove. I can suggest the following condition wording is used as a format, with additional details added if the Case Officer believes them necessary.

Prior to the commencement of development (including demolition, ground works, and vegetation clearance) a “lighting design strategy for biodiversity” features or areas to be lit shall be submitted to and approved in writing by the local planning authority. The strategy shall:

a) Identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specification) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Daniel Weaver
21/03/2018