

7307 / TJM

Mark Hyde
Carter Jonas LLP
6-8 Hills Road
Cambridge
CB2 1NH

18th November 2016

Dear Mark,

RE: Phase 3 Cambridge Bio-Medical Campus – Response to Comments from Mr John Meed relating to the Ecological Appraisal (October 2016).

Further to the comments received by Mr John Meed (email dated 10th November 2016) for the above site please find our response below. For clarity, the comments from Mr John Meed are presented (*italicised*) followed by our response.

“Phase 1 Habitat Survey is a methodology which is not designed to give any significant data on bird species. The report itself states that only ‘Incidental records of bird species encountered during the Phase 1 habitat survey were recorded’.”

The Ecological Appraisal as prepared by FPCR is intended to support allocation of the site within the South Cambridgeshire Local Plan and provides details of a desk study and an extended Phase 1 Habitat Survey. As stated the survey methodology employed is not designed to provide detailed information on faunal groups including birds. The Ecological Appraisal does however provide a comprehensive desk top study which includes records of notable bird species for the local area as supplied by CPERC along with details of the on-going surveys undertaken by Mr John Meed. This data included within the desk study has been used to inform our assessment of the likely impacts as a result of the proposals on the bird assemblage using the site. Given the size of the site and the nature of the habitats and their extent within it, it is our opinion that the data gathered from the desk study is sufficient to inform an assessment of the impacts to the bird assemblage and that no further bird surveys are required. Were further bird surveys to be carried out, it is considered highly unlikely that the results of these surveys would alter or further inform the conclusions of the impact assessment.

“A thorough read of the report suggests that the writers have limited expertise in the area of threatened farmland bird species. Paragraph 5.23 which describes my research states: that the site and surrounding arable habitats supports a farmland bird assemblage including a number of common to fairly common but declining species such as skylark and yellowhammer.’ The definition of red list species as ‘common to fairly common but declining species’ bears no relationship with that in the red list itself which is: ‘birds of high conservation concern’ and which for these purposes includes those where there has been a ‘severe (at least 50%) decline in UK breeding population’.”

The speciesq status as given within the Ecological Appraisal have been taken from the Cambridgeshire Bird Report 2013 as published by the Cambridgeshire Bird Club. Little comparison can be made from those species of high conversation concern (red/amber BoCC list) with their status as commonly or rarely occurring. It is true that a number of BoCC red list species are

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Lockington Hall
Lockington
Derby DE74 2RH

Tel: 01509 672772
Fax: 01509 674565
mail@fpcr.co.uk
www.fpcr.co.uk

Offices also at Addlepool Business Centre, Clyst St George, Exeter, Devon EX3 0NR
and Unit 8 Dunley Hill Court, Dunley Hill Farm, Ranmore, Dorking, Surrey RH5 6SX

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Directors: Phil Rech BA B Phil LD CMLI, Tony Pearson BA B Arch RIBA, Gary Holliday BA M Phil LD CMLI, Suzanne Mansfield BSc (Hons) PhD MCIEEM CMLI
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common and widespread occurring species (e.g. skylark), whilst others are BoCC green listed (low conservation concern) but are localised and rarely occurring (e.g. peregrine falcon).

Whilst it is acknowledged that the vast majority of UK farmland bird species are of medium (BoCC amber) or high (BoCC red) conservation concern and have shown both recent and historical moderate to rapid declines in population numbers, it is well documented that these declines are largely as a result of agricultural intensification and not through development. Specifically The State of the UK's birds 2015¹ states 'The link between agricultural intensification and the long-term declines of many farmland birds is well established, specifically:

- ~ the loss of mixed farming and the habitat diversity it supported;
- ~ increased use of pesticides and inorganic fertilisers;
- ~ changes in grassland management (such as re-seeding of permanent pasture, increased stocking rates and a switch from hay to silage);
- ~ changes in crop types and the timing of management, especially the switch from spring to autumn sowing of cereal crops and the consequent loss of winter stubbles and lower-input spring crops;
- ~ increases in field sizes and the loss of non-farmed and boundary habitats;
- ~ more efficient and widespread drainage

This report goes on to say 'the decline of yellowhammers in arable and pastoral areas is believed to have been driven by a lack of overwinter seed and Grey partridges have declined due to a lack of invertebrate food for chicks, resulting from pesticide use and changes to cropping practices.'

"While reference has been made to my research, this appears to be deliberately and misleadingly selective. The quote above from Paragraph 5.23 makes no reference to the corn bunting and grey partridge, both ground-nesting species which have declined by over 90% in recent decades."

The report is not intended to be selective in any way. The assessment made is based upon the recorded farmland bird assemblage as a whole which includes all of the notable farmland bird species recorded on site; corn bunting, grey partridge, linnet, skylark and yellowhammer which are all BoCC red listed and identified as Priority Species under Schedule 41 of the Natural Environment and Rural Communities (NERC) Act (2006). It is accepted that corn bunting, grey partridge and skylark will be lost as potential breeding species from the site and the effect of this has been considered within the impact assessment.

"The conclusion (5.24) that 'the continued availability of further arable habitats within the wider landscape residual adverse effects are not considered to be significant for this farmland bird assemblage' is an assertion, supported by no evidence that it might in fact be true."

The Ecological Appraisal recognises that there will be adverse residual impact upon the farmland bird assemblage which is known to be present on site. However, given the size of the site and the availability of further suitable extensive arable farmland habitats immediately adjacent to the site, this loss is not likely to significantly affect local populations of farmland birds and we do not consider that a significant impact is likely to arise.

"That in 5.25: 'the mosaic of new habitats proposed within the site are also considered to offer further nesting opportunities for cuckoo, linnet and yellowhammer' is similarly unfounded. And once again, no mention is made of corn bunting and grey partridge - presumably the writers do at least know that the site would be lost for ever for these species."

Whilst detailed landscape proposals have yet to be finalised, the illustrative masterplan identifies that proposals are to include areas of species rich grassland, an attenuation pond, ditches, formal

¹ Hayhow DB, Bond AL, Eaton MA, Grice PV, Hall C, Hall J, Harris SJ, Hearn RD, Holt CA, Noble DG, Stroud DA and Wotton S (2015) The state of the UK's birds 2015. RSPB, BTO, WWT, JNCC, NE, NIEA, NRW and SNH, Sandy, Bedfordshire

landscaped areas and most notably a wide landscape buffer linking existing established habitats associated with Nine Wells LNR to the wider network of hedgerows and designated sites for nature conservation. With the exception of farmland birds (for which adverse residual impacts are recognised), the intensively managed arable habitat offers very few opportunities to other bird species and other faunal groups. Proposals to include a mosaic of grassland, water bodies and landscape planting is likely to offer further nesting and foraging opportunities to a number of notable and generalist scrub, woodland and woodland edge species many of which are BoCC red and amber listed. This is likely to include a number of species known to occur locally, including but not limited to cuckoo, song thrush, mistle thrush, whitethroat, duncock, green woodpecker and bullfinch. In the longer term and once established, the landscape buffer is likely to complement the existing and retained hedgerow habitats and provide additional nesting opportunities to linnets and yellowhammers which are known to occur within the adjacent arable habitats.

“If you care to study the research that has been carried out into the decline of farmland birds, you will see that it is precisely this field-by-field loss or decimation of habitat that has brought us to a point where, for example, there are now just 43,000 breeding pairs of grey partridge in the UK - a population that will not be viable if the process continues.”

As stated above, it is well documented that the large declines seen in farmland bird populations is predominantly due to agricultural intensification and farming practices.

I trust the above is acceptable to you. Please do not hesitate to contact Rachel Gordon or myself should you require any clarification or wish to discuss the above in more detail.

Yours sincerely,



Tim Meakin
Senior Ecologist
FPCR Environment and Design Ltd.

tim.meakin@fpcr.co.uk