



The countryside charity
Cambridgeshire
and Peterborough

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11 July 2022
Letter Sent by email to:
planning@cambridge.gov.uk
Copy Sent by email to:
tom.gray@greatercambridgeplanning.org

Dear Tom,

Ref: 22/02066/FUL Demolition of nursery building, part of outbuildings; partial demolition, refurbishment and extension of other existing college buildings and the erection of four accommodation blocks containing 60 rooms for postgraduate students; associated landscaping, car and cycle parking, refuse and other storage and new electricity substation within outbuildings. Queens College, Owlstone Croft, Owlstone Road, Cambridge, CB3 9JJ.

CPRE Cambridgeshire & Peterborough strongly objects to this application.

CPRE have reviewed the information that has been published on the council's website by the applicant and their advisers, by consultees and by members of the public we object to this application for the following reasons.

Proximity to Paradise Nature Reserve

This development is on a site bordering the Paradise Nature Reserve – see satellite image below.



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The nature reserve is under the protection of the City Council and it is worth recalling what the council's own web site says about the reserve. The following are extracts:

"Paradise local nature reserve is a wooded area surrounding a small marsh. It's on the west bank of the River Cam, southwest of Sheep's Green and Lammas Land."

"The reserve is one of the few wet woodland sites along the Cam, and so it is a vital habitat for many species."

A low canopy of willow and alder trees dominates, providing a varied and diverse structure. Willowherbs, meadowsweet and water mint all thrive here.

A historic stand of butterbur at the lower end of the reserve has been mentioned in documents dating back to the 1600s. The glorious pink flower spikes that bloom before the leaves in early spring are spectacular.

You can often hear chiffchaffs and willow warblers in the warmer months.

The reserve's willow trees are home to the rare musk beetle. The adult beetle's metallic blue-green colour and long antennae make it an exciting find in the summer."

"We do not heavily manage the wet woodland or 'carr' areas, allowing the natural process of willows splitting, falling and regrowing to take place. This creates many opportunities for invertebrates, bats and birds to find nesting holes and shelter.

We manage the marsh area to keep some areas of open water to attract waterfowl such as water rail, moorhen and migrating geese."

"The riverside path through the reserve is prone to flooding in winter. There are boardwalks at the rear to allow access when flooding occurs. The boardwalk is wide enough for wheelchairs and prams."

So, clearly this a special place for nature within the city which the council manages carefully and which provides controlled access for visitors via the designated pathway.

It is a designated Local Green Space and is consequently afforded a similar level of planning protection by the National Planning Policy Framework as an Area of Outstanding Natural Beauty or a Green Belt.

"99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

100. The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.

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101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts."

Such protection includes protection from the effects of external impacts such as noise, light and airborne pollution.

The Cam corridor, including Paradise Nature Reserve, is recorded in the 2015 Green Belt Review as a key Townscape Character Area of the City providing an unbroken Green Corridor through the City.

CPRE considers that the proposed development will cause a significant negative impact on the small area of green space between Owlstone Croft and the river which is part of the Nature Reserve.

Light disturbance, which is already significant, will be increased. Noise disturbance will be increased. During the construction phase it is probable that construction dusts, escaped plastics and other materials will be blown into and pollute the Nature Reserve.

Will partying post-graduates always respect the boundaries of the Nature Reserve or will they find it a convenient place for off-piste barbecues and other nature-disturbing activities? From experience as post-graduates, some of us are aware that behavioural boundaries can sometimes be stretched. It is all part of social education.

CPRE is therefore very concerned that this proposal if allowed could result in significant harm to the Nature Reserve and to the many species of wildlife which inhabit it, several of which are increasingly rare and threatened by human activity.

In this respect we share the concerns expressed by the Friends of Paradise Nature Reserve in their letter dated 5th July 2022 and by the South Newnham Neighbourhood Forum in their letter dated 28th June 2022.

Fire risk and rapid access for Emergency Services

CPRE has noted the constricted access to the site and are concerned that this could affect rapid access for the emergency services, particularly in the event of a fire. We have noted the size of the vehicle which Cambridge Fire and Rescue have stated will need to have access to the site but have not determined any modelling of turning patterns or other access constraints which might impede this vehicle.

CPRE are concerned because not only does this pose a possibly increased risk to residents but if a fire is uncontrolled during an extended period of dry weather such as the UK has experienced for the past six months, it could also pose an increased risk of spread to the Nature Reserve.

Flood Risk

CPRE notes the concerns and recommendations of the Local Lead Flood Authority and the Environment Agency with respect to this application. However as statutory consultees, that advice is constrained to current accepted norms for flood protection which, in our experience, are driven by the findings of IPCC 2014.

In 2019, IPCC increased its forecasts for the rate of sea level rise by 10% to 3.3mm per year. Since then, IPCC publications have indicated that IPCC now expect the 1.5°C global temperature rise target to be breached, possibly to somewhere between 2.3 – 2.6°C. If that global opinion is correct, then sea levels will rise further accordingly and the risk of flooding in the Cam-Ouse valley basin, which is tidal up to Brownhill Staunch, will rise also.

It therefore seems very inadvisable to continue with building on the flood plain in a location that is already at risk of flooding as in this case.

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Summary

1. This proposal, if allowed, will cause unacceptable disturbance to the Local Green Space, the Paradise Nature Reserve.
2. CPRE have concerns about restricted access for emergency services, possibly increasing fire risk to the Paradise Nature Reserve.
3. CPRE is concerned that long-term flood risk to the site which is on the flood plain could be under-estimated.

CPRE Cambridgeshire and Peterborough therefore objects strongly to this proposal.

Finally, please note that our submission is in respect of the proposed application. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

Yours sincerely

Alan James BSc.Tech. PhD CEnv CITP

On behalf of CPRE Cambridgeshire and Peterborough

Cc: Cllr. Lorna Dupre, Chair Environment & Green Investment Committee, Cambridgeshire County Council: lorna@lornadupre.org.uk