

Cam Valley Forum - 17 February 2026

Response to consultation on

Cambridge City Council Draft Biodiversity Strategy 2026-2031

Overall, we think the draft Biodiversity Strategy is good. Our comments are as follows.

1. Need for greater emphasis on protection of *in-situ* biodiversity

The draft Biodiversity Strategy correctly calls for protection and enhancement of wildlife and biodiversity, but there is little specific mention of the need for protection of the remaining *in-situ* biodiversity. The BNG legislation allows for biodiversity in a location to be “lost to development, if the latter is considered sufficiently important, on the basis that it can be re-created elsewhere”. We feel that this opens up a considerable risk of loss of key biodiversity, and would like to see stronger emphasis on protecting current remaining *in-situ* biodiversity.

2. Strategic objectives

Reflecting the above general point, we would like to see the first two of the strategic objectives (summarised on page 5 and worded in full on page 43) re-ordered and the text adjusted as follows:

1. **Strengthen protection of, and** improve condition and connectivity of designated sites and priority habitats ***in-situ*.**
2. Secure a measurable biodiversity net gain across the city.

The strategic objective on BNG should perhaps also mention the targets (the statutory target which is 10%, and the City Council’s laudable desire to reach 20%)

The summary objectives on p 5 need editing to reflect more closely the fully worded strategic objectives on p.43.

3. Section 4

4.3. Special mention is made of The Big Chalk Partnership, Butterfly Conservation, and Nature Town and Cities. We would like to see mention of the following national initiative as this is specifically relevant to Cambridge’s biodiversity and key habitats:

CABA (the Catchments Based Approach - <https://catchmentbasedapproach.org/>) which has a strategy specifically for chalk streams, the key recommendation of which is to develop ‘*an overarching level of protection and priority status for chalk streams and their catchments*’, and its closely associated partner, the Rivers Trust <https://theriverstrust.org/our-work>

4.4. We are pleased to see mention of the “*Draft South Cambridgeshire Climate & Nature Strategy 2026–2030*” but we understand this is to be a joint strategy with Cambridge City Council. This may need correcting or clarifying.

4.5. Bottom of page 16/top of page 17: the paragraph on actions underway on chalk streams does not mention the GCCSP. This project should be mentioned, along with future work on the city’s chalk streams that is expected to build on the results of the case study work currently underway through the GCCSP.

4.6. The importance of designated City Wildlife Sites is acknowledged but there appears to be little in the draft to indicate how their biodiversity will be safeguarded. Some are already under significant threat from development. The very small area covered by designated LNRs is clearly illustrated in

Map 1. The overlay, on Map 5, of designated sites with the Cambridge Nature Network priority areas looks very good and positive until one realises that the majority of the area of designated sites is non-statutory protection.

Section on “Wetlands” (p.29): it would be useful if this could be termed ‘Wetlands **and** Watercourses” to make it clear that river and streams are included here, not just fenland and marshes, which some might initially think of as wetlands. We appreciate the attention given to chalk streams.

4.7. (p. 32). – Local threats and pressures. This section needs specific mention of ‘over-abstraction’ of water for both household and non-household use. Over-abstraction is a major contributor to both ‘urbanisation’ and ‘hydrological change’. There is a mention of ‘depleted aquifers’ but not of what is causing these.

4. Section 5. Biodiversity Audit

The biodiversity audit, on which the strategy is based, was undertaken in 2020, over 5 years ago. At that time, as noted “*Overall, 123 ha (63%) of the total area of the audit is in poor condition*”. We wonder if there might already be some significant changes to the baseline? We note the more recent figures for particular sites in 2025 (Table 3, p.40) but it is difficult to get an overall picture.

We think that the biodiversity audit should include at least some measure of the health of the City’s river and chalk streams, given the efforts that have been put into gathering data on water quality and quantity, and other metrics relevant to this key habitat type. We are aware the BNG metrics do not specifically address this, but think it is essential that the local biodiversity strategy should do so. As far as we are aware there is no requirement for a local authority biodiversity strategy to focus specifically on the BNG approach.

Somewhere there needs to be a specific commitment or action on improving communication with local residents about the City Council’s management of biodiversity and why certain apparently ‘damaging’ actions (e.g tree felling, in-channel stream work etc) are necessary. Public awareness of the natural environment and the need to protect biodiversity is fortunately high in Cambridge but the complexity of its management in the face of development pressures is not always well understood.

General comment

The draft text needs some good editing as some of the sentences are ambiguous and not always easy to interpret.