

## Overview

The revised Biodiversity Strategy keeps the overall direction of the current Strategy – while constructively tightening the focus, updating to address new law and policy, and reshaping both the action plan and monitoring framework. The earlier Strategy set a vision of achieving measurable net biodiversity gain across Cambridge, structured around seven Objectives under three Themes. The revised Strategy explicitly retains the overall vision and high-level Themes, while refining and sometimes replacing individual Actions and indicators, in light of what has (and has *not*) worked since 2022.

The revised Strategy constructively places much more emphasis on measurable progress with updated baselines, clearer indicators, and reporting arrangements that track delivery of actions and outcomes. It is well integrated, clarifying how e.g., the Cambridge Nature Network priority areas, Local Nature Recovery Strategies (LNRS) and the Council's emerging Urban Forest Strategy will feed into site selection, planning decisions and investment.

### ➡ This is all positive 👍

However, a number of weaknesses should be addressed, to strengthen this draft Strategy.

- Less clear sense of urgency and milestones By stretching delivery into a second phase, treating 2022–25 more as a 'ramp-up', sometimes **blurs near-term urgency** by reducing pressure for early, transformational change.
- More complex governance is not always clearer Delivery in the draft Strategy accommodates new layers [e.g., LNRS, statutory Biodiversity Net Gain (BNG), the Urban Forest Strategy, Greater Cambridge Planning]. This complexity requires consistent and clear explanation of *who* is responsible for *what*, by *when*, and, above all, **how** they can be **held to account**.
- Over-reliance on statutory BNG and spatial frameworks? The current Strategy relies on BNG, Cambridge Nature Network and 'Doubling Nature', but also features proactive projects that go *beyond* minimum planning requirements. The draft Strategy aligns more closely with national BNG and the LNRS – risking **choking off** locally driven, discretionary projects (in e.g., smaller sites, where statutory tools are less pertinent).
- Weaker focus on concrete neighbourhood-level benefits The current Strategy emphasises 'Nature in your Neighbourhood', access to local green spaces, and working with 'Friends groups' and volunteers. This enables residents to see easily how the Strategy impacts them. The draft Strategy is expressed in more technical terms ('targets', 'networks', 'indicators', 'compliance'). This risks **local, site-specific and equality-focused benefits** being less visible, relevant and accessible to residents and – further – makes such benefits plainly secondary to more abstract regulatory alignments.
- Monitoring needs better focus on measurable ecological outcomes Under the current Strategy, the Council delivered on many actions **without** achieving the hoped-for scale of nature recovery. There is a clear need to monitor progress *better* against a biodiversity baseline. While this draft Strategy improves the indicator framework, it leans too much toward counting actions and outputs (projects delivered, hectares in management, trees planted) **rather than ecological outcomes** (habitat condition, species trends, connectivity). It is essential for residents, partners, Councillors and Officers all to be able to assess whether Cambridge **is or is not** genuinely on track for 'measurable net gain'.
- Dilution of community voice The 2021 public consultation on *that* draft Biodiversity Strategy enabled significant partnership with residents, local groups and conservation organisations. However, this draft Strategy's consultation has been *deliberately* bundled with the 'parallel' Urban Forest Strategy (while *entirely* overlapping with other major and challenging public consultations), despite the two documents lacking parallel or inter-linked structures. Meanwhile the ostensibly equally 'parallel' Climate change consultation had come and gone before these two had even begun. Together, this has

dramatically reduced residents' **capacity** to provide meaningful input. The consequent built-up frustration of local residents is obvious in e.g., this **29/1/26** comment found on a local discussion board, (posted by a person I have never previously come across):

"I suppose it's possible this "consultation" will be different, but all the council consultations I've responded to in the past have been a sham, constructed to get a particular answer, although perhaps, if enough people band together, something could be done. (Methods of manipulation regularly used: 1. consulting on a very limited predetermined choice, major decisions already made; 2. listing benefits no one would say no to, eg more youth services, which never get delivered/will be delivered anyway even if scheme the council wants to "sell" doesn't go ahead/without warning of the sometimes extremely high costs (eg demolitions) the benefit depends on, potentially making the "benefit" a bad choice; 3. questions so vague they're pretty meaningless and the council can draw whatever conclusions they want 4. compelling the respondent to agree to at least one option whether they agree with any of them or not; 5. not accurately transferring responses from surveys into the following report, eg one report cast doubt on whether anyone in my situation existed, although I reported it clearly in the survey.)"

- **Therefore** the finalised Strategies must demonstrate clearly how meaningful, relevant and thoughtful public input **does** alter the drafts' focuses, approaches and priorities – so community influence is not seen to be manifestly weaker than previously.

With all of these concerns in mind, and aiming to maintain and retain the strengths of this draft Biodiversity Strategy, the following pages offer commentary as well as detailed suggested **amendments** to the draft text.

These are intended throughout to:

- tighten accountability and align with emerging standards;
- boost visible and *essential* urgency; and
- optimise neighbourhood-level desirable outcomes.

For clarity, proposed new wording is preceded by a → symbol and designated with green text.

## 1. Foreword

**Issue:** The tone is celebratory and process-heavy; urgency and accountability for delivery 2026–31 are understated.

Re: "When we adopted our 2022 Biodiversity Strategy, we pledged to undertake a midterm review on progress and direction. This draft revised strategy for consultation seeks to update changes in national legislation and recognise new regional strategies, partnerships and local projects." **Replace with:**

→ When we adopted our 2022 Biodiversity Strategy, we pledged to undertake a midterm review on progress, direction **and delivery**. This draft revised strategy for consultation seeks **not only** to update changes in national legislation and recognise new regional strategies, partnerships and local projects, **but also to set out clear, time-bound actions and measures of success for the period 2026–2031.**

Re: "It provides an opportunity to reflect on and celebrate the many successful projects and partnerships working to protect and restore nature across the city and beyond." **Replace with:**

→ It provides an opportunity to reflect on and celebrate successful projects and partnerships, **and to be honest about where progress has been too slow or uneven so that we can correct course quickly.**

**Add** at end of the second paragraph:

→ We are now halfway through the decade in which the UK has committed to halt and reverse nature loss; failure to act decisively between 2026 and 2031 would lock in further decline in Cambridge's habitats and species.

In the final paragraph, strengthen accountability and demonstrate that aims will be consistently translated into results, **replace** “We propose to take a lead on this and I hope you will feel inspired to respond to the consultation and join us in whatever way you are able.” **with**:

→ We propose to take a lead on this, and commit to publishing annual public reports on progress against this strategy – so that residents, partners and communities can hold us to account.

## 2. Vision

**Issue:** Strong long-term vision, but lacks sufficiently explicit reference to: 2030/2031 milestones; equity between neighbourhoods; and accountability. The draft Strategy focuses mainly on land management and planning within the city boundary; could more weight be given to value-chain management, financial actors and the redirection of harmful subsidies and investments?

At the start of the section, **add** a short framing sentence:

→ This strategy translates our long term corporate vision into specific outcomes that must be achieved in every neighbourhood by 2031.

At the draft’s 1st paragraph, **add**:

→ The Council will aim for local and global supply chains linked to the city (e.g., in construction materials, food, research inputs) to reduce their negative biodiversity impacts.

*<Aligns draft Strategy with IPBES’ messages on value chains and trade (A6, B10); cf the Report cited at end of list on p. 6 of this feedback >*

In the quoted biodiversity vision, to **add** explicit timing and equity:

‘Our Biodiversity Strategy vision is that over the next 5 years Cambridge will see a “measurable net gain” in biodiversity, both within the city and the surrounding countryside, including the extent and quality of priority habitats and populations of priority species. **Replace by**:

→ ‘Our Biodiversity Strategy vision is that over the next 5 years Cambridge will see a “measurable net gain” in biodiversity that will be demonstrable – both within the city and in the surrounding countryside (including the extent and quality of priority habitats and populations of priority species) **with no ward left behind in access to nature and in improvements to local habitats.**

**Add** a final sentence to the paragraph:

→ Progress towards this vision will be tracked through publicly reported indicators, including: ‘biodiversity units’ on Council-managed land; on the condition of key sites; and on meaningful public access to natural green space within an average 10–15 minute walk from residents’ homes.

## 3. Executive Summary

**Issue:** Good structure, but lacks explicit neighbourhood-level framing, baselines and targets.

### The ‘Vision’ paragraph

By 2031, Cambridge will achieve a measurable net gain in biodiversity, ensuring priority habitats and species are protected, enhanced, and connected. **Replace by**:

→ By 2031, Cambridge will achieve a measurable net gain in biodiversity **compared with the 2020 baseline set out in our Biodiversity Audit**, ensuring priority habitats and species are protected, enhanced, and connected. We will also have piloted business-relevant metrics (e.g. biodiversity units, habitat condition, species trends) for local businesses to use.

*<The latter aligns the draft Strategy with IPBES’ calls for standardized, decision-relevant indicators and scenarios (C5–C6, Table SPM.7); cf IPBES, cited on p.6 of this feedback. >*

And also **add**:

→ We will publish updated biodiversity unit scores for our core sites in 2028 and 2031, and aim to use these to demonstrate at least a 20% increase in units across Council-managed natural green spaces by 2031 – subject to available resources.

### The 'Strategic Objectives' list

Make objectives clearly testable by **adding** text to three of the six bulleted items:

- Deliver measurable biodiversity net gain across the city. **Replace by:**
  - • Deliver measurable biodiversity net gain across the city, including a minimum 20% net gain on all Council-led developments and a net increase in biodiversity units across Council-managed natural green spaces by 2031.
  
- Improve condition and connectivity of designated sites and priority habitats. **Replace by:**
  - • Improve condition and connectivity of designated sites and priority habitats, so that by 2031 at least 75% of Local Nature Reserves and Commons are in moderate or good condition and no site remains in poor condition without a published recovery plan.
  
- Embed biodiversity considerations across all Council services and developments. **Replace by:**
  - • Embed biodiversity considerations across all Council services and developments and local economic policy and business-support programmes. Furthermore: support local businesses to adopt biodiversity accounting and reporting and encourage firms to set science-based nature targets aligned with the LNRS and global goals.
  - <Align draft Strategy with IPBES' whole-of-government approaches (KM3, B1; setting nature targets aligns with IPBES B8–B9; cf the Report cited at end of list on p.6 of this feedback >*
  - Consider** also citing Logan's Meadow and Hobson's Park schemes (mentioned at p.2–3 & p.8 of the Draft Strategy) as examples of how planning, S106, and public–private co-funding offer a prototype enabling-environment, for net-gain-positive, business-led development.
  
- Empower communities, businesses, and institutions to act. **Replace by:**
  - • Empower communities, businesses, and institutions to act, with a particular focus on neighbourhoods currently lacking high quality natural greenspace, and support at least one LNRS-aligned community nature project in every ward by 2030.

### The 'Key Themes' bullets

Under 'Biodiversity Mainstreaming':

Signal the city's role in shifting financial flows at local scale (in line with IPBES B3), with:

- Develop and pilot biodiversity-weighted procurement criteria for major public realm and housing projects by 2028.

Under 'Nature in Your Neighbourhood':

Promote community-led projects, Nature City Accreditation, pollinator-friendly initiatives, and biodiversity education. **Replace by:**

- Promote community-led projects, Nature City Accreditation, pollinator-friendly initiatives, and biodiversity education, **with targeted support for wards with lower canopy cover, fewer wildlife-rich sites, or greater social disadvantage.**

### The 'Action Plan' paragraph

**Add** to the end:

- Each action in the plan specifies a lead service, partners, intended outcomes and timescales, and we will use these to report transparently on delivery each year through our Biodiversity Duty Report.

### Consider **adding** a *Resident-focused Executive Summary (plain-language version)*

**Provide** a boxed 'Summary for residents and neighbourhood forums', alongside or immediately after the formal Executive Summary, with text along the following lines:

#### → **Summary for neighbourhoods and residents**

Nature in Cambridge is under real pressure. Many of our commons, parks and rivers are still in poor or only moderate condition for wildlife, despite volunteers and community groups having worked hard to improve them. This updated Biodiversity Strategy sets out what the Council and its partners will do between 2026 and 2031 to turn that around – street by street, and neighbourhood by neighbourhood.

By 2031, we want to see clear improvements that residents can experience close to home. That means: more wildflower areas and richer grasslands in our parks and Commons; healthier chalk streams and riverbanks; more trees and shade on streets and in housing estates; and more places for birds, bats, insects and other wildlife to thrive. We also want every resident to have a good quality natural greenspace within a short walk of where they live, work or study.

To achieve this, the Strategy focuses on three main areas:

- **Embedding nature in everything we do** – making sure Council services, new developments and day-to-day decisions all evaluate the short- and long-term impacts on nature, and securing at least 20% biodiversity net gain in Council-led developments.
- **Looking after our core nature sites** – improving how we manage Commons, Local Nature Reserves and rivers so that our most important habitats move from poor or moderate condition towards good, while also creating better links for wildlife across and beyond the city.
- **Nature in your neighbourhood** – supporting community-led projects in parks, streets, schools and housing areas, prioritising places that currently have less-than-average access to nature, and helping residents shape and monitor unfolding local action.

We will publish clear information each year on what has been done, where, with its results. A mid-term review in 2028 will check whether we are on track and also evaluate where and what needs to change.

This is not a strategy the Council can deliver alone: it depends on local groups, businesses, schools, colleges and residents becoming involved. Neighbourhood forums and community organisations will be key partners in identifying local priorities, co-designing projects, and holding the Council to account in the delivering of changes that nature – and our communities – need.

#### 4.1 Why we need a strategy

**Issue:** Good narrative, but the declared biodiversity emergency needs to be translated more clearly into “what must change by when”; furthermore, neighbourhood equity is implicit rather than explicit. For ‘emerging standards’ of the Tables in the IPBES Report (its pp 7& 8) cited on my p. 6.

First paragraph – **add urgency:**

“In 2019, we declared a biodiversity emergency in recognition of the pressures facing our natural world, both locally and internationally”; **Replace by:**

→ In 2019, we declared a biodiversity emergency in recognition of the accelerating pressures facing our natural world, both locally and internationally, **and acknowledged that ‘business as usual’ in the way we plan, manage and use land in Cambridge is not compatible with nature recovery.** It is clear that local firms, institutions and supply chains (e.g., construction, life sciences, tourism, higher education, finance) *both* depend on functioning ecosystems (water quality, flood regulation, liveability for skilled workers) *and* contribute to biodiversity decline through land-take, resource use and pollution. These impacts create systemic risks for economies and societies, not just local environmental issues.

**Add** a short commitment paragraph after the first paragraph:

→ From 2026, we will treat the 742 hectares that the Council manages as a single, connected nature network for which we are collectively responsible. We will set site-level objectives for habitat condition and for biodiversity units, prioritising improvements on larger Commons and parks that serve multiple neighbourhoods and that currently perform only poorly for nature.

After the 3rd paragraph on p. 7, about working with Friends Groups etc., **add:**

→ Despite these efforts, our 2020–2025 audits show that many of our most visible Commons and recreation spaces remain in poor or only moderate ecological condition; furthermore, recreational pressure and urbanisation continue to erode wildlife value. This strategy therefore focuses on changing how we manage land and support more environmentally attuned behaviour in every neighbourhood. The Council will encourage and (where possible through planning conditions or

procurement) encourage businesses and institutions to measure and publicly disclose their biodiversity impacts and dependencies in line with emerging standards. <cf IPBES, below>

After the final paragraph on p. 8, about the use of S106 contributions etc., add:

→ We will continue to seek S106 contributions, targeting their deployment also in areas with relatively poor access to nature – even if this means small-scale initiatives due to the lack of obvious large-scale opportunities.

### 4.3 Legislation and policy

**Issue:** Current policy, legal, financial and cultural conditions tend to make harmful business practice profitable, and beneficial practice unprofitable; changing this ‘enabling environment’ is essential. The draft Strategy is strong on habitat projects but much weaker on these systemic levers. Section 4.3 outlines many key Policies and national initiatives on page 11. After these lists it should **note:**

→ These Policies and National initiatives build a local enabling environment for businesses. Under this Strategy, the Council will use its levers (planning conditions, procurement, fiscal tools where available) to align profitability with positive biodiversity outcomes. This aligns with IPBES KM2, KM3 and B2–B3. <cf the Report from IPBES, in the list, below >

I recommend that the following (especially the 7th of these) should be included in the bullet-point lists on pp 11–12; where agreed, these should also be added to Appendix 1 (pp 53–59).

→ • **Environmental Improvement Plan 2025 (EIP 2025)** – the latest legal, regularly updated delivery plan for the 25 Year Environment Plan, which raises the interim target for wildlife-rich habitat restoration, and places a stronger emphasis on delivery for LNRS ‘responsible authorities’;

→ • **Local Nature Recovery Strategies** statutory guidance and regulations – Defra guidance and the 2023 Procedure Regulations, which set out how LNRSs must be prepared, consulted on and used (see [this](#) and [this](#));

→ • **Natural England’s Green Infrastructure Framework (2023)** see [here](#) and its 2024–2025 supporting blogs, case studies, and mapping-tool updates (see [here](#), [here](#), and [here](#)). These provide nationally recognised benchmarks for e.g., 15-minute access, trees and greening levels, which should serve as a reference in the Local Plan, the Biodiversity Strategies and design guides;

→ • The developing **Environmental Land Management schemes (ELMs)** as a major driver for land-use change around Cambridge (picked up via LNRS/EIP but not named) see [this](#) or [this](#);

→ • **The Kunming–Montreal Global Biodiversity Framework (2022)**, the UN’s current global ‘deal’ to halt and reverse nature loss by 2030, that is intended to guide national and local strategies – including Biodiversity and Nature-recovery plans – to encourage local actions collectively to add up to global recovery as adopted in the COP15 decision (the full text is [here](#));

→ • **Global biodiversity loss, ecosystem collapse and national security (published 20.1.26)** via [HM Government](#), examining global ecosystem degradation and collapse and their threat to both UK national security and prosperity – highlighting that those countries best placed to adapt are those that invest in ecosystem protection and restoration.

→ • **IPBES Business and Biodiversity Assessment: Summary for Policymakers (published 08.02.26)** from the Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES), a global independent research body comprising 150+ member states governments. This concludes that the business-as-usual model this is heavily focused on *growth at the expense of nature* is not only unsustainable, it threatens our extinction, unless reversed. It reframes the often-destructive relationship between nature and commerce, showing not only how business impacts and **depends** on biodiversity, but also how nature contributes to people’s and society’s wellbeing.

#### 4.4 Local Initiatives

**Issue:** Section 4.4 captures several of the big landscape-scale and institutional initiatives shaping nature recovery around Cambridge, but should address *local* initiatives. It leans too heavily towards broader strategic plans, but should demonstrate how – together – local initiatives can also relate to the spatial, policy and community framework for this Biodiversity strategy. Local and wider-scale initiatives should be clearly aligned, without duplicating precious effort and resources.

On page 14, before introducing Natural Cambridgeshire, Cambridge Nature Network, LNRS etc., **add** to the initial paragraph:

→ The following are not only conservation initiatives but also the spatial and policy framework within which businesses and financial institutions can invest, disclose and manage impacts on biodiversity.

**Add a clear subheading** for '**community-focused initiatives**' that includes the following important local programmes. For each element, include at least one sentence on what it contributes (e.g., “provides the evidence base for landscape-scale targeting”, or “offers a long-term vision for fenland expansion and access” or “creates a framework for ward-based community projects aligned with LNRS”):

→ • **River Cam CAN** (Climate Action through Nature) – a grant-funded project led by Cambridge Past, Present & Future, working with communities along the Cam on nature and climate actions that directly links biodiversity, climate resilience and social equity in river-adjacent neighbourhoods.

→ • **State of Nature in Cambridgeshire** reports – Natural Cambridgeshire’s county-level “State of Nature” assessments provides evidence, priorities and case studies that underpin local action.

→ • **Cambridgeshire County Council Biodiversity Strategy** is already implicit via LNRS, but this could be named to show alignment with the County’s wider policy framework.

→ • **The Green Infrastructure** work, associated with the Cambridge Nature Network and Doubling Nature (GI opportunity mapping, Cambridge Nature Festival), emphasises access to greenspace and health.

Furthermore, the Strategy should **add a subheading** to highlight **the desirable principles** underlying small-scale, hyper-local biodiversity projects such as:

→ • Planting street trees, hedges, planters and rain gardens with a variety of resilient or wildlife-friendly species.

→ • Creating continuous or “stepping-stone” habitat along streets or arteries (trees, shrubs, climbers, pollinator planting), instead of isolated ornamental tubs.

→ • Designing features such as rain gardens or pocket planting that manage runoff and improve water quality as well as providing nectar, cover and nesting opportunities.

To make 'Nature in your neighbourhood' a meaningful reality, **add another subheading** and include text to focus on **examples** of hyper-local biodiversity projects that should be nurtured under the new Biodiversity Strategy (a few suggestions follow):

→ • Ideas from ‘Mill Road For People’ to '**green** Mill Road, in Cambridge – a nature-poor but population-dense area, where relatively small interventions could deliver disproportionate benefits for both people and wildlife, (echoing current initiatives in Brussels, London, Walton-on-Thames, Arnhem, Lorquí, Potenza, Dunaujváros, Vienna and Amsterdam) - see e.g. <https://www.dw.com/en/how-one-city-won-over-its-residents-to-turn-parking-into-green-space/a-75017286>

→ • Creation of **micro-corridors linking green spaces** (e.g., along Petersfield side streets, in Mill Road Cemetery, along the Chisholm Trail)

→ • any project that supports **climate resilience** (by enhancing shade or cooling, and by improving air-quality) and boosts residents' daily contact with nature — all tying in with the draft Biodiversity Strategy's 'Nature in your neighbourhood' theme

→ • the Biodiversity enhancements (initially EIP-funded), in and around **St Matthew's Piece**, in Petersfield Cambridge that included the establishment of a small volunteer-supported new urban community orchard with a substantial rain garden, designed to boost foraging opportunities for insects, birds and mammals.

A **further, cautionary, subheading** should address **predictable hurdles for such initiatives** that need to be addressed structurally and strategically. Some pilots for hyper-local biodiversity projects struggle to be maintained or grow, even when well designed. The most successful initiatives treat 'greening' initiatives as a both *permanent and mainstream*. Preventing these obvious problems should be explicitly built into the new Biodiversity Strategy, seeking to **avoid**:

→ • Lack of long-term funding or ownership – where temporary greening is wastefully installed for a 'project', and then removed or left poorly maintained once the grant period ends;

→ • Weak community buy-in – due to residents experiencing changes being imposed 'from above', thereby *unnecessarily* creating polarisation and opposition (to e.g., loss of car-parking space ) that can distract and dominate, resulting in constructive pilots not being repeated or extended;

→ • Failure to integrate a project into wider strategic plans, so they remain isolated rather than becoming the normal or expected approach in e.g., street or development-project design.

#### 4.5 Cambridge City Council role

**Issue:** Strong *description* of assets, but lacks: explicit commitments, measurable expectations, and neighbourhood focus.

**Add** a short commitment paragraph after the first paragraph:

→ From 2026 we will treat these 742 hectares as a single, connected nature network for which we are collectively responsible. We will set site level objectives for habitat condition and biodiversity units, prioritising improvements on larger commons and parks that serve multiple neighbourhoods and currently perform poorly for nature. The Council will treat biodiversity loss as a systemic business and economic risk locally (to investment, insurance, and health), aligned with IPBES' framing of biodiversity loss as a systemic risk to financial stability.

<cf the Report listed on my p.6, from IPBES >

**Also add several** passages with specific and clear *commitments* after the paragraph that runs from page 15 to 16 (on local watercourses); here are seven suggestions:

→ To advocate, through the Cam & Ely Ouse catchment partnership and regulators, for restoring environmental flows on all Council-managed chalk streams to a level consistent with achieving at least "Good Ecological Status" under the Water Framework Directive by 2030.

→ Pledge to oppose major growth or infrastructure proposals that would increase net abstraction from the Cam chalk aquifer unless these demonstrate credibly no deterioration in river flows, with these tests to be explicitly built into both the Council's planning responses and relevant emerging Local Plan policies.

→ Commit to achieve, by 2030, phosphate and nitrate concentrations in Council-managed watercourses that meet "Good" status thresholds, with at least quarterly sampling at fixed points – and results included in the Council's Environmental Improvement Plan monitoring.

→ Commit to support (through planning obligations, partnership projects and land agreements) delivery of nature-based solutions such as wetlands, surface-water separation and attenuation schemes that directly reduce inflows to combined and foul sewers, prioritising catchments feeding the most frequently spilling overflows identified in the 2023–2025 Event Duration Monitoring (EDM) data.

→ Commit to create at least 10 new in-channel or marginal habitat features (backwaters, side channels, woody-debris complexes, or offline ponds) by 2030, in line with national chalk-stream restoration guidance, and to maintain these under a published management schedule.

→ Commit to bringing all Council-managed riparian land along the Cam and chalk streams into a positive management regime for nature (e.g. wild margins, reduced mowing, buffer strips) by 2028, aligned with Local Nature Recovery Strategy priorities and national chalk-stream strategy recommendations.

→ Commit to publish prominently and annually a succinct, balanced and clear *State of the Cam and Chalk Streams in Cambridge* report – summarising flows, water-quality metrics, habitat works and key species trends, co-designing the indicators with key local groups (such as the Cam Catchment Partnership and Friends of the Cam). Meaningful contributions to this report from all relevant local water authorities will be sought for inclusion in this report.

To the paragraph on trees (middle of p. 17): “Through implementation of our Tree Strategy (2016 – 2026), we manage over 30,000 trees...” **Add**:

→ The updated Urban Forest Strategy (2026–2036) will include ward-level canopy targets and a clear programme of planting and diversification, prioritising streets and estates with low canopy cover and high vulnerability to either the Urban Heat Island Effect and/or to air pollution.

In the paragraph (p. 17) on Council property and communal Open Spaces, **add** these concrete pledges:

→ For new Council-led housing schemes we will require integrated and sustainable biodiversity enhancements (e.g., swift bricks, bat boxes, rain gardens and wildlife-friendly planting); for existing estates we will work with tenants to identify at least one biodiversity improvement project in each estate by 2031, and continue to enhance these over following years. Further, we will aim to use the Council’s procurement and investment policies to favour suppliers and contractors with credible biodiversity performance and disclosure.

<The latter pledge aligns with IPBES B3 & C2; cf the Report on the list of my p.6 >

At the end of the section, **add** an accountability sentence:

→ We will bring together these responsibilities in an internal “nature at home and work” programme, with annual public reporting on changes to habitat quality, canopy cover and community participation across the Council-managed estate.

## 4.6 Biodiversity in Cambridge

**Issue:** Provides a strong descriptive baseline but could be strengthened with regard to credibility, usability and ‘strategy’.

Although Section 4.6 describes habitats, sites and designations well, it does not distil which elements of the city’s biodiversity resource are the top priorities for protection, restoration or investment over 2026–2031 – discussion of which is reserved for later in the Strategy.

How meaningful is it to account for biodiversity **gains** without simultaneously monitoring and accounting biodiversity **losses** due to any cause with Cambridge, particularly any that are directly attributable to Council-led initiatives? For example, consider the ‘blackberry hedge incident’, raised in #4 on page 11 of this feedback. To make commitments on improved and more equitable access to nature *more reliable, usable and credible*, **add** to this section e.g.,:

- a clear **list** of critical habitat types and locations, linking these to the Strategy’s objectives and action plan;

- quantitative **baselines** (e.g. total hectares of each priority habitat within the city, or current condition status), to facilitate determining 'measurable net gain' over time;
- **key data** from the separate Biodiversity Audit and Chalk Stream reports should be summarised to support both non-specialist readers and decision-makers;
- clarity on how **unevenly** access to better-quality biodiversity is distributed across Cambridge (highlighting which wards are most nature-deprived or where residents are farthest from high-quality green spaces) ... enhancements to biodiversity and social-equity should overlap.

#### 4.7 Local threats and pressures

**Issue:** Apart from the addition of the pretty photo on p. 33 – this seems to be verbatim the same as the previous Strategy document. Has **nothing** improved? changed? deteriorated?

### 5. Biodiversity Audit (2020–2025)

**Issue:** Although the evidence presented is strong, the implications for action – especially at site and neighbourhood level – are not sufficiently articulated. Issues relating to Paradise LNR should be addressed explicitly.

To promote transparency and enable businesses, residents, Councillors and Officers to evaluate how neighbourhoods are being monitored and served locally, after the 2nd paragraph on p. 35 **add an accessible reference** to the baseline habitat audits done across the 32 sites in 2020.

Ongoing monitoring should be designed to support both statutory reporting and local business and community needs (e.g., making city data available through open platforms to allow assessment of location-specific risks and opportunities). Consider **pledging** after the 1st paragraph on p 34:

→ We will by 2027 publish an open biodiversity data portal for Cambridge, aligned with LNRS mapping, to enable communities, businesses and institutions to assess site- and neighbourhood-level impacts and dependencies.

<Aligns with IPBES' call for robust, accessible biodiversity information systems (A.4.4–A.4.6 in Table SPM.1); cf Report cited in the list on p. 6 of my feedback.>

Before the final sentence of the 3rd paragraph p. 36 (where the text states that 63% of the audited area is in poor condition), **add**:

→ These findings underline the scale of change required: most of the greenspace that residents see and use daily is still managed in ways that limit its value for wildlife and its resilience to climate change. This Strategy therefore commits to shifting management practices across our largest commons and recreation grounds and to making those changes visible, meaningful and more clearly valuable to local communities.

**Add** a short paragraph linking to neighbourhood outcomes, before the final paragraph on p. 37:

→ We will communicate management changes through on-site interpretation and ward-level engagement, so that residents understand why some areas may look 'messier' and how this *contributes* to healthier and more resilient green spaces.

In the bullet list on page 39 of common recommendations, **make them more directive**:

**Add to** • Relaxation of grazing pressure or reduced mowing frequency on grasslands...

→ From 2026 we will progressively relax grazing pressure or reduce mowing frequency on priority grasslands identified in the audit, starting with Coldham's Common, Midsummer Common and Stourbridge Common, and will agree clear grazing and mowing regimes for each site with stakeholders while preserving and protecting ancient grazing rights.

**Add to** • Restricting or limiting impacts of recreation...

→ We will introduce targeted measures to manage recreational pressure (including dog walking) on sensitive grasslands, woodlands and watercourses, e.g., path rationalisation, seasonal signage,

dog-free zones and improved provision of bins, all co-designed openly with local users and while maintaining or improving public-access rights generally to green open spaces.

There is a glaring absence of content in this Strategy (cf. paragraph 1 on page 41) regarding the obvious **threats** to the condition of Paradise LNR, following the recent commencement of substantial development by Queens' College (not due for completion until mid-2027) along the boundary with Paradise LNR. This approved project includes the felling of 8 mature poplar trees – with expected significant impacts on bats, nesting birds, canopy cover and invertebrate habitat along what will remain of the woodland corridor. Text should be **added** to the Strategy to make explicit and transparent to residents what monitoring, protective and remedial measures can be expected to be taken to look after this key site – particularly in view of these biodiversity threats being to *one of **only two*** sites in Table 3 (p. 40) in both “**good**” and “**stable**” condition.

## 6. Biodiversity strategy (vision, objectives and themes)

**Issue:** Strong narrative but some objectives and themes are still high level; sharpen them and insert explicit accountability and neighbourhood level expectations.

The introductory wording (pp. 41–43) seems to be essentially identical to the previous Strategy document. Has **nothing** improved? changed? deteriorated?

### Strategic objectives

On page 43, **edit** four of the bulleted objectives (#1–3 and #5) to be less ‘fluffy’, more measurable & more neighbourhood focused:

1. To secure a measurable net gain in biodiversity across the city by 2031 in support of the Natural Cambridgeshire Doubling Nature Vision by 2030. **Replace by:**

→ To secure a measurable net gain in biodiversity across the city by 2031, **compared with the 2020 baseline**, in support of the Natural Cambridgeshire Doubling Nature Vision by 2030.

2. To ensure designated sites and priority habitats are in good / favourable condition...

**Replace by:**

→ To ensure designated sites and priority habitats are in good / favourable condition **wherever feasible and that, by 2031, no Council-managed LNR, Common or County Wildlife Site remains in poor condition without a funded and time-bound improvement plan.**

3. To engage and promote awareness... **Replace by:**

→ To engage and promote awareness of biodiversity and wellbeing, supporting and empowering coordinated action in our communities, businesses, and institutions, **with particular focus on neighbourhoods with high social disadvantage or poor access to natural greenspace.**

4. To maximise the potential of our buildings, parks... **Replace by:**

→ To maximise the potential of our buildings, parks, open spaces, allotments and community gardens, watercourses and tree stock to support biodiversity, whilst balancing their multifunctional needs, **and to demonstrate visible improvements in at least one priority site in every ward by 2031.** Biodiversity *destruction* due to the Council-led elimination of the well-established protective blackberry hedge – which had long run along the south side of the New St allotments in Abbey Ward), over-riding vocal and well-reasoned local-community objections – will not recur.

**Add** an explicit monitoring objective after the 7th (on p. 43):

→ 8. To publish an annual Biodiversity Duty Report and mid-term progress update (2028) that set out progress against each objective, highlight gaps, and propose corrective action where delivery is off track.

### Theme descriptions (on pp 44–46)

These are laudably strengthened versus the previous version, but need more.

Under ‘**Biodiversity mainstreaming**’ **add** the following:

→ From 2026 we will require all major service projects and programmes (e.g., those rated ‘high’ or above on the corporate-risk matrix for at least one of finance, legal/compliance, health and

safety, environmental impact, or reputation, and therefore tracked through the corporate- risk register rather than only a service-level register), to demonstrate how they will contribute **positively** to biodiversity objectives.

This positive biodiversity requirement should also apply to any project that:

- delivers a key corporate priority (e.g., climate and biodiversity, housing, major regeneration, transport or digital transformation), or is needed to meet statutory duties or government targets where failure would have serious consequences; or that
- involves multiple external partners, long timescales (multi-year) and inter-dependencies with other major infrastructure or transformation programmes (e.g., the Market Square/Civic Quarter proposals, and major ICT or depot relocations).

We will integrate biodiversity considerations into business cases, procurement and asset management decisions, and provide practical guidance and training to service managers to support this shift.

Under ‘**The core**’ **add** explicit site-level ambitions:

→ By 2031 we aim to have moved all City-managed core sites currently in poor condition to **at least** moderate condition, and to have demonstrably improved connectivity along the River Cam corridor and between the city and the Gog Magog Hills priority area – as measured through habitat mapping and biodiversity units.

Under ‘**Nature in your neighbourhood**’ **strengthen** neighbourhood outcomes:

In the first paragraph on p. 45, “The aim is to ensure nature is not restricted to a few precious locations and that it can be enjoyed, understood, and experienced by all.” Should be **replaced by**:

→ The aim is to ensure nature is not restricted to a few precious locations but that it can be enjoyed, understood, and experienced by all – regardless of where in the city people live, their income, or their housing type.

And also **add**:

→ We will work with communities to develop ward-based nature priorities, aligned with the LNRS and Cambridge Nature Network, and we will support residents to shape and monitor local projects.

→ **Note** also the **Appendix** to these comments (on the wards selected for LNRS projects).

## 7. Action plan (2026–2031)

**Issue:** Actions are mostly clear but lack success metrics and community-visible outcomes; timelines are too-often open ended (“ongoing”); the current Strategy’s Action plan was much more detailed (24 pages vs only 5 here) on planned outcomes and especially on **who** would do **what**. The draft Strategy also depends heavily on community and volunteer effort in action plans (especially for managing Local Nature Reserves and other sites, delivering habitat creation and enhancement, and contributing to the Cambridge Nature Network and Doubling Nature ambitions). This reliance is **problematic**. Using volunteers and local groups to enhance and extend professional work may be sensible considering financial constraints, but using them as a *de facto* substitute for baseline Council capacity risks under-delivery if those external inputs weaken (due to predictable risks e.g., funding cuts, volunteer fatigue, or loss of key organisers).

The 1st paragraph on page 47, seems important but is confusing; it reads:

“Since adoption of the strategy in 2022 we have been collaborating on actions to achieve our objectives. **Appendix 2** Biodiversity Duty Report summarises our key activities under our 3 themes and celebrates successes to date.”

But Appendix 1 runs pp 53–59; this Strategy document **has no Appendix 2**. Please **address**.

**General edits: add a short paragraph before the tables and then also implement associated additions to make ‘outcomes’ more meaningful and useful:**

→ For each action we will define a small number of success measures (for example, hectares of habitat restored, number of wards engaged, or condition of specific sites) and report progress annually. Where actions are marked ‘ongoing’, we will review delivery at least every 2 years to confirm that these actions remain effective and adequately resourced.

**Examples of additions to make ‘outcomes’ more meaningful and useful using specific suggestions (look for where else to mirror this pattern across all three tables):**

**For ‘Biodiversity Mainstreaming’ table (pp. 47–48):**

• Under ‘Consider and embed nature in everything we do’ (p. 47) **reiterate and embed** the Council's commitment to being herbicide-free. Currently, the draft Strategy lacks any reference to being and remaining herbicide-free – although having gone herbicide-free represents **a major step** towards biodiversity recovery and improving ecological public health. Commitment to being herbicide-free features heavily in the Biodiversity Strategy 2022-2030 (written prior to the Council having gone fully herbicide-free. For this Biodiversity Strategy to be taken seriously it **must** address pesticide use (including herbicides), as these are a major driver of catastrophic biodiversity loss. So **add:**

→ The Biodiversity Strategy 2026-2031 will:

- End the use of pesticides in the routine maintenance of the City and County Council’s public realm estate in Cambridge
- Bring in other key stakeholders to follow suit in ending the use of pesticides on land under their control.
- Encourage the public to stop the use of pesticides in gardens, allotments and other areas.
- Lead and support in making Cambridge a ‘Pesticide-Free City’.

• Also **add** also the following specific actions to:

→ • develop **Cambridge guidance or a toolkit** to help SMEs assess their biodiversity impacts/dependencies *<aligns with IPBES C5–C6, C8>*

→ • pilot **voluntary biodiversity-impact disclosure** mechanisms with anchor institutions (University, hospitals, large employers) and linking these to citywide monitoring;

→ • engage with local financial institutions (e.g. university endowment, pension funds, local banks) to **explore nature-positive investment** aligned with the LNRS *<aligns with IPBES B2, B3, B12>*

→ • develop guidance on **nature-positive procurement** for major city projects *<aligns with IPBES Table SPM.1 Actions A.1.3, on integrating biodiversity into procurement>*

• Ensure CIP and other City Council developments achieve a minimum 20% BNG target across all projects – **add a measure:**

→ Outcomes: New developments secure high-quality habitats and species enhancement – with long-term management and monitoring in place; **BNG calculations and monitoring reports are published for all Council-led schemes.**

• Implement Environmental Management System... – **add:**

→ Outcomes: Improved environmental performance across City Service, **including meeting published targets for pesticide reduction, improvements to soil health, and protection of priority species on operational sites.**

• Explore rainwater harvesting ....

**Correct** the text from “Reduced abstraction **for** aquifer for tree watering and other operation functions” to “Reduced abstraction **from** aquifer for tree watering and other operation functions” and **expand** the text to indicate a metric by which performance of this desirable outcome can be measured.

**For 'The Core' table (pp. 48–49)**

- Local Nature Reserve and Commons management – **specify outputs** by adding: **invasive species, and deliver at least one habitat condition improvement (as defined in the DEFRA metric) in each site by 2030.**

- Conservation Cattle Grazing Review – **add:**

→ Outcomes: Review grazing timescales and number of animals to ensure we meet site-management plan conditions, **and implement revised regimes on at least three priority commons (including Midsummer Common and Stourbridge Common) by 2028.**

- Trial use of... – Under 'Outcomes', **clarify** how management would/could/might be enhanced – to make this outcome **measurable**.

**For 'Nature in your neighbourhood' table (pp. 49–51)**

The Strategy should **add** text to explicitly address how to tackle the entirely predictable risks of funding cuts, volunteer fatigue, or loss of key community organisers – particularly insofar as these could negatively impact key objectives such as:

- **Equitable access to nature:** Neighbourhoods with poor green space often also have weaker volunteer capacity, so relying on community projects can widen the gap in access to high-quality natural spaces.
- **Long term condition of key sites:** Maintaining Local Nature Reserves and priority habitats in favourable condition requires consistent management; if volunteer days or NGO capacity fall away, core tasks (e.g., scrub control, invasive-species management) may lapse.
- **Strategic metrics (net gain, Nature Network targets):** Citywide net gain and Nature Network outcomes require reliable, sustained delivery across the whole area. Over-reliance on community and partner capacity – without corresponding professional staffing and funding – makes these goals vulnerable to factors the Council does not control.

In addition, the following suggested changes...

- Nature Recovery 'From the Ground Up' LNRS delivery ward-based community action – **make outcomes ward-specific:**

→ Outcomes: 4 year Cambridge County Council Project targeting parish-scale delivery of the LNRS. Initially selected wards: Cherry Hinton, Abbey, East Chesterton, Market & Trumpington, **with at least one co-designed project per ward and monitoring of ecological and social outcomes.**

→ **Note** here the **Appendix** to these comments (on the wards selected for LNRS projects).

- Parks Biodiversity Toolkit promotion – **add a success metric:**

→ Outcomes: Inspire communities to co-design and secure funding for local park biodiversity enhancement, **with at least ten parks or recreation grounds incorporating Toolkit-inspired changes by 2030, and revise the 2021 Toolkit (drawing on this experience) by 2031.**

- Environmental Education Spaces – **add:**

→ Outcomes: Continued use of 3 spaces, explore at least 1 additional site, **and engage at least 500 pupils per year (from different schools each year) in hands-on nature learning across the sites.**

At the very end of the Action Plan, on page 51 after the Tables, **add** a clear accountability sentence:

→ We will review and, if necessary, update this action plan in 2028, based on monitoring evidence and community feedback. Furthermore, we will clearly flag any actions that are delayed, re-scoped or not delivered, together with stating clear reasons for this – specifying appropriate remedial steps.

Then add a 'Delivery and Monitoring' sub-section to the Action Plan (i.e, to Section 7) that pulls together and summarises accountability points:

→ **Delivery and Monitoring**

Delivering this strategy requires clear responsibilities, transparent reporting, and the ability to change course when actions are not working. We will therefore put in place a simple but robust delivery and monitoring framework for 2026–2031.

- **Clear ownership:** Each action in the plan will have a named lead service and senior officer sponsor, with roles agreed annually through service plans.
- **Measurable outcomes:** For each strategic objective we will track a small number of indicators, including biodiversity units on Council-managed land, condition of key sites, ward-level access to natural greenspace, and community participation in local nature projects.
- **Annual public reporting:** Progress will be reported each year through our Biodiversity Duty Report and on the Council website, highlighting achievements, delays, and any actions that are no longer fit for purpose.
- **Mid-term review:** In 2028 we will carry out a mid-term review of this strategy and action plan, using monitoring data and community feedback to confirm priorities, identify gaps, and agree any necessary changes.
- **Neighbourhood focus:** We will monitor how benefits are distributed across the city, including between wards, and will target additional support where communities currently have poorer access to nature or lower-quality greenspaces.
- **Community voice:** Residents, community groups and partners will be invited to comment on annual progress and to propose new or improved actions, particularly where local experience suggests our approach needs to change.

Finally, add a **Glossary of Key Terms** – including **all acronyms** used throughout the Biodiversity Strategy – to enhance clarity, usability and transparency for residents, partners and Councillors.

## Appendix: ‘Nature in your neighbourhood’

**Summary:** The "Nature Recovery 'From the Ground Up'" project names four wards (Cherry Hinton, Abbey, East Chesterton, Market & Trumpington) but gives no selection criteria or scope to add others – such as Petersfield. Therefore: Petersfield is proposed here because of (a) its dense housing; (b) low POS provision, and its location near both the Cam and City Centre that supports connectivity. Please provide: (1) published selection criteria for wards; (2) flexibility to add or opt in additional wards; and (3) for Petersfield to be either an immediate fifth focus ward (if funded) or the first reserve/expansion ward when opportunities arise.

The **Nature Recovery ‘From the Ground Up’** project will work in the four named wards, but there is no clarification for why those specific wards were selected or whether others (e.g., Petersfield) could also be added.

This Cambridgeshire County Council–led, four-year project targets “parish scale delivery of the LNRS”, for which the city component is: Cherry Hinton, Abbey, East Chesterton, Market & Trumpington. The strategy does not state the criteria used, nor does it specify whether this list is fixed for the full 4 years.

This Appendix seeks clarification and expansion of the list – to include Petersfield. Note that Petersfield has characteristics that offer a strong case for inclusion, for example:

1. High-density housing and extremely poor availability of Public Open Space;
2. Small-scale, street, courtyard and school-based nature projects could have a significant impact on the daily environment of residents of all ages;
3. Proximity to both the Cam corridor and to the City Centre offers clear opportunities to improve ecological connectivity as well as enhanced access to Nature.

Therefore:

- The criteria used to choose the four wards initially selected should be published in the final Biodiversity Strategy (or supporting papers).
- Petersfield should be considered now as a fifth focus ward, if funding allows; or as the first reserve / expansion ward if the project is extended; or if there is underspend; or as soon as extra grant funding becomes available.
- The project design should explicitly *either* include additional pilot wards (e.g. Petersfield) from an early stage, *or* specify a mechanism for additional wards to be added to the project – especially where there is both demonstrable community capacity and need.