

RAPLEYS

Hearing Statement for
Associated British Foods (ID No: 983242)

EAST CAMBRIDGESHIRE LOCAL PLAN EXAMINATION MATTERS 13 AND 14

3 September 2018

Our Ref: WH/379/31/4

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1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Associated British Foods ('ABF') in response to the Examination Matters 13 and 14, specifically in relation to the Station Gateway site allocation and the former Westmill Foods site, Angel Drove, Ely ('the Site'), which is in part included in the Station Gateway site allocation. The Site Location Plan is attached at **Appendix 1**.
- 1.2 ABF is the owner of the Site, which extends to circa 3ha and was previously occupied by significant agro industrial buildings. The Site has been vacant in excess of 13 years, and the buildings which occupied the southeast of the Site were demolished and cleared in 2012. This part of the Site is approximately 1.9ha and is previously developed brownfield land, included in the Station Gateway allocation. The north-western part of the site ('the Rear Site') is open land with some vegetation. The Rear Site falls within a County Wildlife Site ('CWS') known as Angel Drove Drains and is currently outside the Development Envelope of Ely.
- 1.3 ABF wishes to ensure that the emerging Local Plan provides a positive planning policy framework to facilitate redevelopment of the whole Site for housing as stated in our previous representations. This Hearing Statement responds to Matter 13 in relation to the settlement boundary and the Rear Site and Matter 14 in relation to Policy ELY.M4 Station Gateway.

2 MATTER 13 DEVELOPEMENT IN COUNTRYSIDE

Issue 1: Whether the plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach towards development in the countryside.

- 2.1 **Question 58a** questions whether the settlement boundaries are appropriate and justified and any modifications are required. As stated in the previous representations, we consider that the Development Envelope of Ely should be extended to include the Rear Site, in order that appropriate development can come forward.
- 2.2 The Rear Site is a highly sustainable location, which adjoins the Station Gateway Site, the existing residential area of Ely. Recreational areas and facilities, a superstore, Ely Town Centre and Ely Railway Station are a short walking distance away. It is therefore considered a highly sustainable and suitable for residential development.
- 2.3 The adopted Local Plan excluded the Rear Site from the Station Gateway and the Development Envelope, defining the Rear site as a countryside location. Notwithstanding its designation as a County Wildlife Site ('CWS'), extending the Development Envelope to include the Rear Site offers a number of sustainable benefits without undermining the wider countryside designation. This is because:
- It is contiguous to the Development Envelope as well as the Station Gateway allocation, which includes part of the Site. It therefore represents a logical and sensitive extension to Ely.
 - It adjoins uses that are appropriate for residential use, particularly in the context of the Station Gateway allocation.
 - Its inclusion in the Development Envelope will not protrude further into the wider countryside. Instead, it will "round off" the existing development.

-
- 2.4 Therefore, the inclusion of the Rear Site within Ely's settlement boundary (and extension of the Station Gateway allocation to include the Rear Site) offers a positive and sustainable approach to accommodate additional housing in a highly sustainable location, which would maintain the wider countryside.
- 2.5 With regard to the CWS designation, it is understood that the current Local Plan does not review the designation or its boundary. The CWS designation itself does not preclude development as confirmed in Policy L30, where it can be demonstrated that development would not have an adverse effect on the CWS or the need for and benefits of the development clearly outweigh the loss and the coherence of the local ecological network is maintained. Therefore, with a sensitively designed housing scheme which takes account of the ecological value, the Rear Site would contribute to the Council's housing requirements as a sustainable extension to Ely and offer other benefits such as the provision of green infrastructure and enhancement of biodiversity on a site which is currently unoccupied and not accessible (due to the land being in third party ownership). Thus, the CWS designation does not present itself as a barrier to the Rear Site's inclusion within the Development Envelope. Rather, sensitive development of the Rear Site has the potential to bring about a number of sustainable benefits.
- 2.6 Any development of the Rear Site should be informed by ecology surveys. A habitat walkover survey of Angel Drove CWS including the area in ABF's ownership in July 2014 concluded that the findings were broadly consistent with those of a Bedfordshire and Cambridgeshire and Northamptonshire Wildlife Trust habitat survey (August 2013).
- 2.7 The ABF's ecologist's walkover survey report appended to our previous representations concluded that the linear component of the CWS comprising a wet ditch and associated hedge and trees (on land beyond the ABF land holding) does qualify for CWS selection under Criterion 1(f), but the northern land area does not appear to meet any CWS selection criteria and its current designation is not easily justified according to the standard CWS selection guidelines for Cambridgeshire and Peterborough. One of the reasons for the designation of the whole Rear Site as recommended in the 2013 habitat survey is due to the site being deemed to be a valuable greenspace and an integral part of Ely's green infrastructure. However, ABF's ecologist advised that areas of valuable greenspace are not covered by the CWS selection criteria and it had no justification to be included within the Angel Drove CWS. Furthermore, the other selection criteria (such as the presence of greater horsetail does not meet the vascular plant criteria and thus there is no justification for the inclusion of the Rear Site within the CWS.
- 2.8 For completeness, an updated Ecology Report completed in August 2018 is attached at **Appendix 2**. Specifically, the report provides details of an update habitat survey and summary of the 2015 protected species survey findings in respect of the Site and Rear Site. In summary, key updated findings include:
- No plant species with specific rarity status were recorded, nor was there evidence of great crested newts in nearby ponds or ditches.
 - There is no evidence to indicate that the Site, including the Rear Site which is part of the Angel Drove Drains CWS, is of significant value in protected species terms.
 - There is no overriding habitat or protected species constraints that would fetter development on the whole Site.
 - The Rear Site continues not to warrant a CWS designation and its inclusion as part of the CWS (which is considered by the CWS citation to be a borderline CWS as a whole) is not supported by current CWS selection criteria.
 - It is entirely feasible that the ecological value of the Rear Site could be retained and enhanced alongside future development proposals via a sympathetic approach to design and access. For instance, this could include the retention and enhancement of

marginal woodland through supplementary planting and management, new habitat creation as part of any SuDs or drainage requirements, and species-specific measures including bird/bat boxes and wildlife friendly lighting.

- 2.9 Whilst the Local Plan does not review the CWS designation, it is clear that more detailed survey information at the time when development proposals are considered will clarify the ecological and biodiversity value of the site. Inclusion of the Site within the Development Envelope and the Station Gateway allocation will facilitate a detailed review of the ecological and biodiversity value, which would be retained through sensitive development, mitigation and enhancement, as necessary. For example, development offers an opportunity to provide green infrastructure and enhance biodiversity.
- 2.10 The Rear site also presents an opportunity to contribute towards the Council's five year housing land supply which has recently been re-visited following the Inspector's Initial Findings for Stage 1 Hearings (Document Ref: ED031). This concluded that a sound approach to setting the OAN for housing is to increase the minimum requirement from 10,835 dwellings to 11,960 dwellings between 2016 and 2036. In the Council's response to the Inspector (Document Ref: ED032) it is stated that taking into account backlog from 2016 and now increased dwelling requirement, there was an even more real likelihood of the Council failing to demonstrating a five year land supply shortly after the Plan's adoption. In conclusion, the Council state that it would only have sufficient supply to meet the increased housing figure if the end date of the Plan is adjusted to 2034. At the time of writing, whilst no response from the Inspector has been received, clearly with a sensitively designed scheme, the Rear Site also has the potential to assist in housing delivery.
- 2.11 It is therefore considered that the Development Envelope/Settlement Boundary of Ely is not justified or positively prepared as it fails to acknowledge and facilitate a highly sustainable urban extension site to deliver housing. The Development Envelope should therefore be amended to include the Rear Site.

3 MATTER 14 PROPOSED SITE ALLOCATIONS MAIN SETTLEMENT ELY

Issue 1: Whether the proposed site allocations for the Main Settlement of the City of Ely are justified, effective and consistent with national policy.

- 3.1 Our client's cleared Site extends to circa 1.9ha and forms part of Ely.M4 Station Gateway allocation. At the outset, as demonstrated in section 3 of this Statement, the Rear Site should be included in this allocation based on the justification provided above. Both the Site and Rear Site are considered viable and deliverable for housing development immediately.
- 3.2 With regards to nearby uses, it is acknowledged that part of the Site adjoins existing industrial uses which also fall within the allocation. Therefore, if development was to be brought forward in advance of those sites, suitable mitigation measures will be incorporated into the residential scheme to ensure the delivery of other plots is not undermined.
- 3.3 In terms of flood risk, unlike other plots within the Station Gateway allocation, ABF's sites are located within Flood Zone 1 (low probability of flooding). On this basis, policy should direct housing development towards this highly sustainable and appropriate previously developed land within the allocation, as well as the Rear Site (for the reasons previously outlined above). As aforementioned, both the Site and Rear Site could potentially be brought forward in isolation from other plots, subject to implementing suitable mitigation measures, and therefore policy should be flexible to give greater weight to their highly sustainable location for housing.

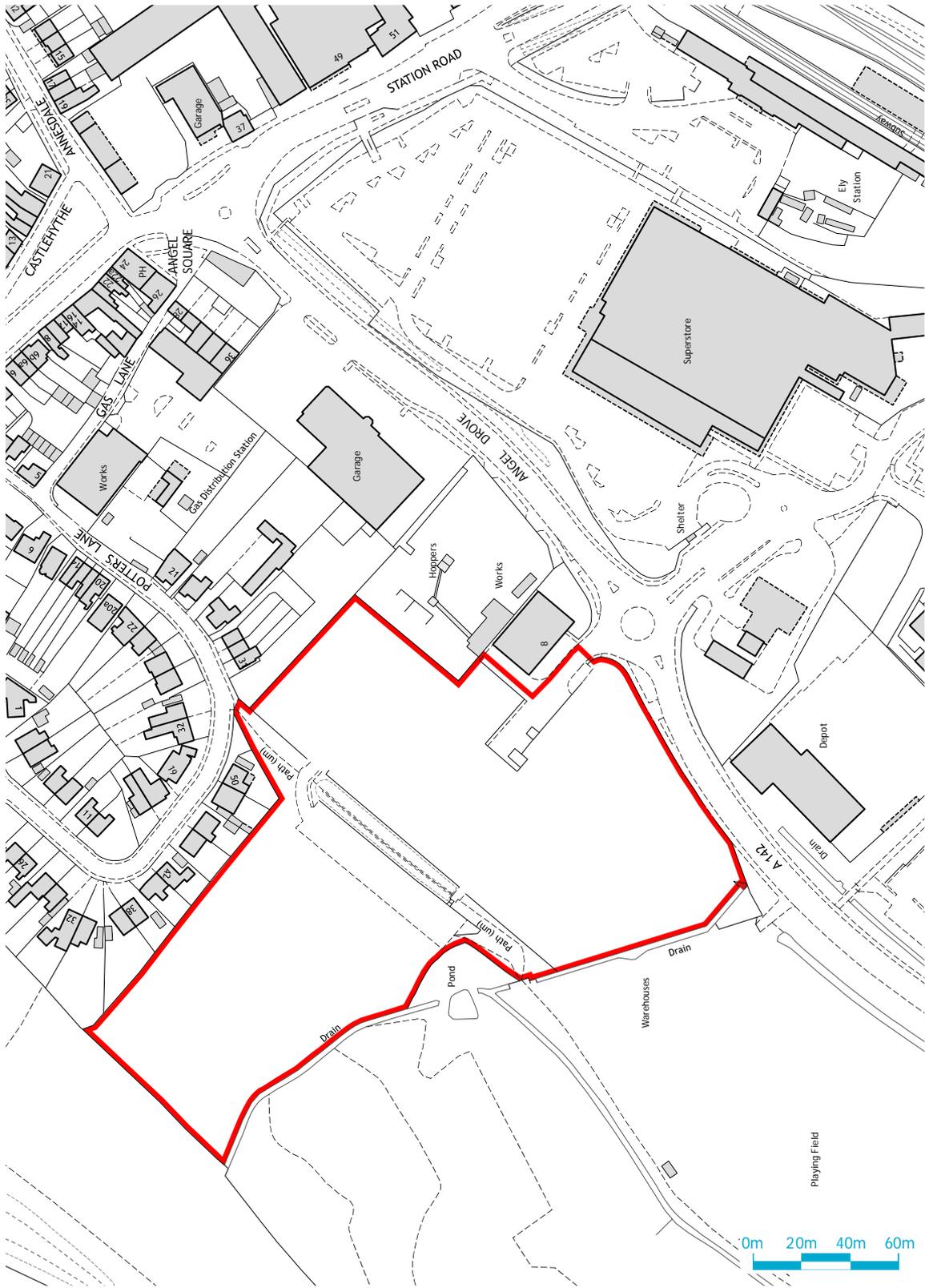
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- 3.4 Whilst employment uses (Classes B1 and B2) are sought by the allocation policy, there appears to be a lack of identified need for these uses to be located within the allocation on the basis that the Ely Station Gateway SPD has now been abandoned and therefore by virtue, its supporting employment evidence base (Document Ref: PE08) is no longer considered robust. Furthermore, and as stated in our previous representations, there is no reasonable prospect of ABF's Site being developed for employment purposes. On this basis, this detailed policy criterion is not considered justified or consistent with the NPPF. This requires LPAs to allocate sites to bring forward sufficient land to address objectively assessed needs and deliver strategic priorities of the area in line with the presumption in favour of sustainable development (paragraph 23).
- 3.5 In summary, the following benefits will be delivered as a result of housing scheme on the Site and Rear Site as part of the Station Gateway allocation:
- The inclusion and development of the Rear Site, which forms a constituent part of the Site adjacent to the existing residential area, will assist in the future growth of Site, the wider allocation, and in turn Ely.
 - The delivery of sustainable development on the Site through recycling and maximising housing delivery on previously developed land that together with the Rear Site is within short walking distance from the railway station, Ely town centre and a range of local services and facilities.
 - A sensitively designed scheme that will take into account all necessary development management considerations to ensure that if residential development comes forward in advance, it does not fetter the development potential of the allocation or existing industrial operations on adjacent plots.
 - Assisting the Council in meeting its housing need and five year housing land supply in light of the Inspector's latest assessment of OAN, with an opportunity afforded by the allocation policy to maximise housing delivery subject to appropriate design.
 - A unique opportunity to introduce ecological and biodiversity benefits on the Rear site via the introduction of suitable mitigation measures and green infrastructure that will maintain the wider countryside whilst enhancing biodiversity as well as accessibility.

4 CONCLUSION

- 4.1 To conclude, ABF remain committed to securing developers/occupiers to bring forward residential development on the Site and Rear Site at the earliest opportunity and consider that both sites are suitable and appropriate for new housing.
- 4.2 Specifically, this Hearing Statement responds to Matter 13 (settlement boundary and the Rear Site) and Matter 14 (Policy ELY.M4 Station Gateway) to ensure that the planning policy framework for the redevelopment of the whole Site for housing is positively prepared.
- 4.3 We therefore request that our representations are taken fully into account in the Development Envelope/Settlement Boundary of Ely and Station Gateway allocation.
- 4.4 We will be pleased to provide further information or explanation on these representations. In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise. Please send all correspondence to Wakako Hirose at wakako.hirose@rapleys.com or 020 7255 8042.

Appendix 01

SITE LOCAL PLAN



SITE LOCATION PLAN

Angel Drive
ELY



Scale @ A4 : 1:2500

Plan No. : 379/31/4_SLP01a

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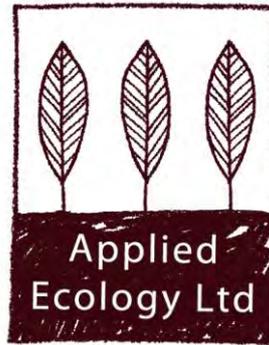
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Appendix 02

**SITE ECOLOGY UPDATE
REPORT (AUGUST 2018),
PREPARED BY APPLIED
ECOLOGY LTD**



Westmill Food Site, Angel Drove, Ely

Ecology Update Report

Produced for Associated British Foods Plc

By Applied Ecology Ltd

August 2018

Document Control:

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	31.08.2018	Final	RJH	DP	DP

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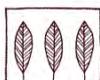
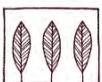


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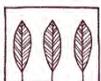


1 Introduction

Background

- 1.1 Applied Ecology Ltd (AEL) was appointed by Associated British Foods Plc (ABF), on 28 August 2018, to complete a habitat survey and prepare an update ecology report for an area of land (the 'Site') located off Angel Drove, Ely. The location of the Site is shown by **Figure 1.1**.
- 1.2 The Site incorporates the former Westmill Food factory site (referred to as Area A) and an area of adjoining ABF owned land to the northwest (Area B), which is currently designated as part of the Angel Drove Drains County Wildlife Site (CWS), as shown by **Figure 1.2**.
- 1.3 AEL were appointed by ABF, in 2014, to complete a desk-based review of relevant biodiversity data provided by the Cambridgeshire and Peterborough Environmental Records Centre (CPERC), together with a walkover survey of the entire Angel Drove Drains CWS designation. The purpose of this initial work was to understand the reasons and justification for part of the ABF Site (Area B) being included within the CWS designation.
- 1.4 Subsequently, AEL was commissioned in 2015 to complete a habitat survey of the Site, and to conduct select follow-up protected species survey work. The 2015 protected species surveys were started, but were not concluded or reported. The surveys completed in 2015 included:
 - a great crest newt presence / absence (eDNA) check of a nearby pond and ditch (samples collected June 2015);
 - a breeding bird survey consisting of three separate visits over the period May-June 2015;
 - two bat activity transect and static detector surveys undertaken in May and July 2015.
- 1.5 The current ecology report provides details of an update habitat survey undertaken by AEL on 29 August 2018, together with a summary of the 2015 protected species survey findings. Details of non-statutory designated sites and existing species records is also reported, but is based on a 2014 data search completed by CPERC. A revised data search was not requested as part of this update due to time constraints.
- 1.6 The importance of Area B in relation to the wider CWS has been discussed previously (see 2014 letter report in **Appendix D**) and is not repeated here, but the implications of the 2018 update survey are considered in relation to this previous CWS appraisal and in light of the current Cambridgeshire and Peterborough County Wildlife Sites Selection Guidelines¹. Recommendations for follow-up protected species survey to support a future planning application for the Site are also provided, together with initial high-level design guidance.

¹ Cambridgeshire & Peterborough County Wildlife Sites Panel (April 2014) *Cambridgeshire and Peterborough County Wildlife Sites Selection Guidelines*. Version 6.2.



Westmill Food Site, Angel Drove, Ely

Site location

 Site boundary

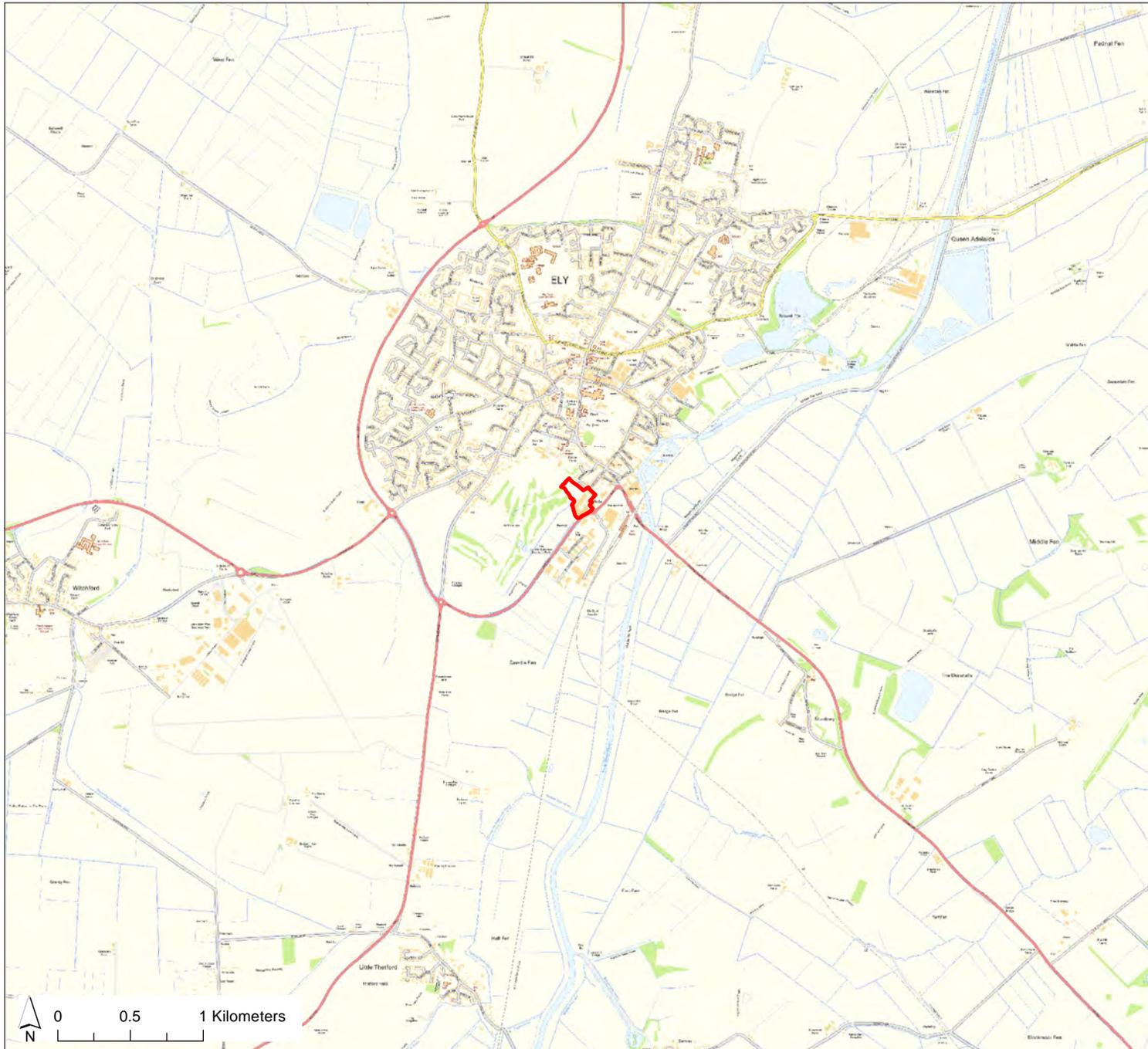


Figure 1.1

Map Scale @ A4: 1:40,000

Surveyed by: N/A

Survey date: N/A

Drawn by: RD

Checked by: RJH

Status: Final



Westmill Food Site, Angel Drove, Ely

Location of Areas A and B

Site boundary
 Area A and B boundary

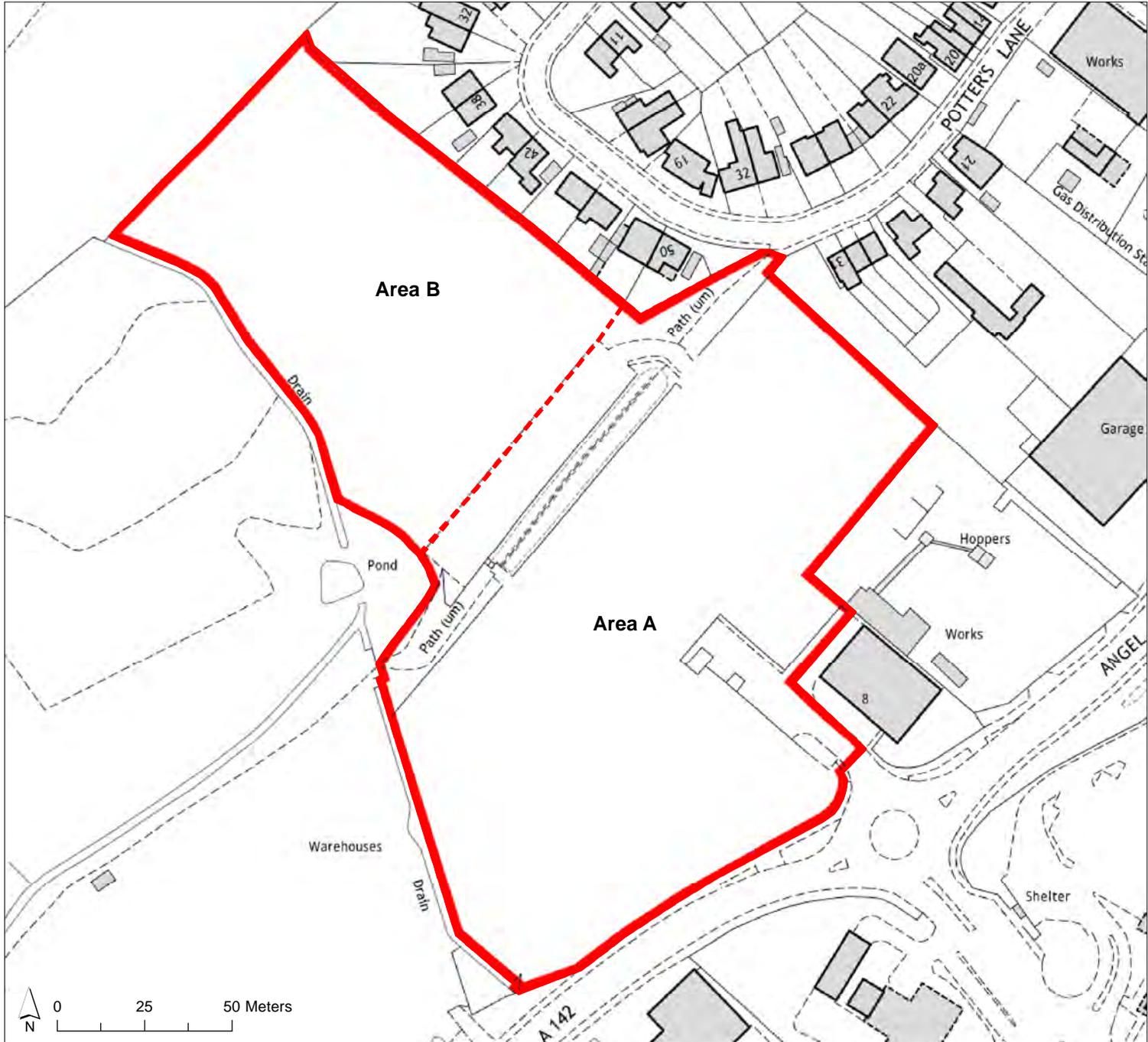


Figure 1.2

Map Scale @ A4: 1:1,650

Surveyed by: N.A
Survey date: N/A
Drawn by: RJH
Checked by: DP
Status: Final



2 Pre-Existing Information

Designated Sites

- 2.1 The locations of statutory and non-statutory wildlife sites in relation to the Site is shown by **Figures 2.1** and **2.2.**, respectively.
- 2.2 The closest statutory wildlife site is **Ely Pits and Meadows Site of Special Scientific Interest** (SSSI) which consists of a number of open water lakes and wet grassland and is located 835 m to the northeast of the Site. This SSSI is important for geological and biological reasons, including its breeding and wintering bird assemblages.
- 2.3 Part of the Site (Area B) is included within the **Angel Drove Drains County Wildlife Site** (CWS). The citation for this CWS is provided in **Appendix A**. The CWS comprises two minor drains backed by species-rich hedgerows and a contiguous area of waste ground. The area of waste ground (Area B) is described by the CWS citation as follows:
- 2.4 *“The area of waste ground is bordered to the west by a continuation of both drains and the associated hedgerow. On the other sides it is bordered by the school playing fields, housing and a car park. The vegetation is dominated by tall herb vegetation with significant areas dominated by Greater Horsetail. Other species include a patch of Lesser Pond Sedge Carex acutiformis, Common Reed Phragmites australis, and significant areas of Hairy Willowherb and Nettle Urtica dioica. Patches of Bramble and Elder scrub also occur, with a row of Poplars along the northern boundary and a hedgerow along the southern boundary adjacent to the car park. The underlying geomorphology, soils and hydrology of this area may be of interest as tall herb vegetation more usually associated with swamps and mires occurs on a slope.”*

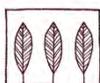
Species Records

CPERC Data

- 2.5 The 2014 CPERC data search generated over 1,200 species records for the search area (2 km buffer around the Site’s central point).
- 2.6 None of the records appear to be related to the Site itself with around 90 % consisting of bird species records, mainly from designated wildlife sites such as Ely and Roswell Pits. Other records include butterflies and moths, otter and water vole (from the nearby rivers and drains) and a few bat records.

2010/11 Surveys

- 2.7 Select protected species survey of the Site was completed by other ecological consultants in 2010/11 prior to demolition of the former factory buildings. The scope of work and associated findings can be summarised as follows:
- No evidence of badger presence was recorded and the wet ditch along the western boundary was not considered suitable for water vole or otter.



- Roosting bats² - an assessment of building suitability for roosting bats. This is no longer relevant as all buildings have since been demolished.
- Great crested newt³ - seven waterbodies and two ditches were identified within 500 m of the Site and were subject to GCN presence / absence survey (four repeat visits) in May 2011. No evidence of GCN presence was found in any of the waterbodies or ditches surveyed.
- Reptiles⁴ – a seven visit refuge survey of suitable habitats within the Site was conducted over the period May – July 2011, and no evidence of reptile presence was recorded.

² Clear Environmental Consultants (November 2010) *Phase 1 Habitat Survey and Protected Species Assessment*. CL693/005/002.

³ Clear Environmental Consultants (June 2011) *GCN Assessment*. CL687/005/005.

⁴ Clear Environmental Consultants (July 2011) *Reptile Assessment*. CL693/005/004.



Westmill Food Site, Angel Drove, Ely

Statutory wildlife designations

-  Site boundary
-  SSSI

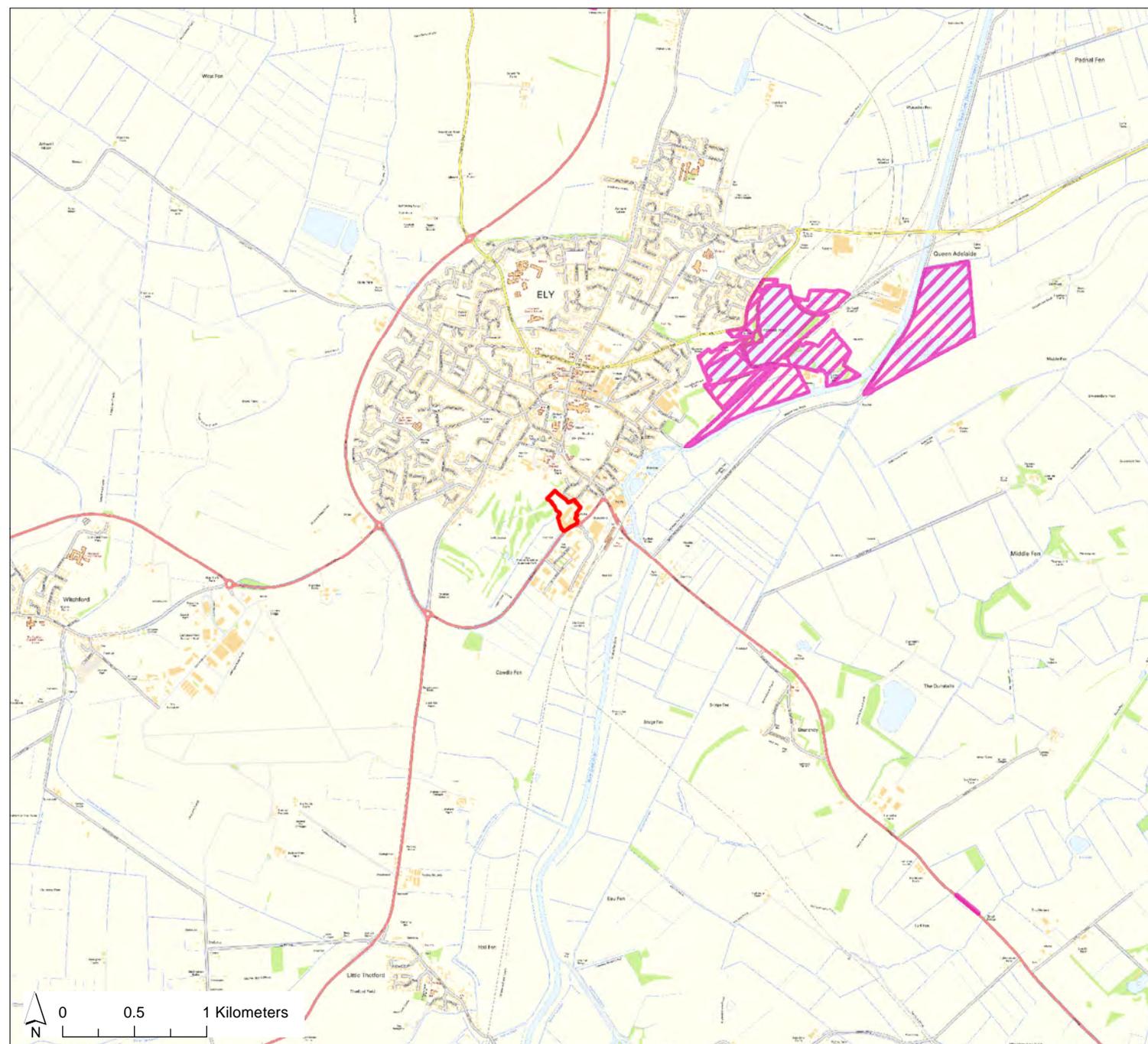


Figure 2.1

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Checked by: RJH
Status: Final



Westmill Food Site, Angel Drove, Ely

Non-statutory wildlife designations

-  Site boundary
-  County Wildlife Site

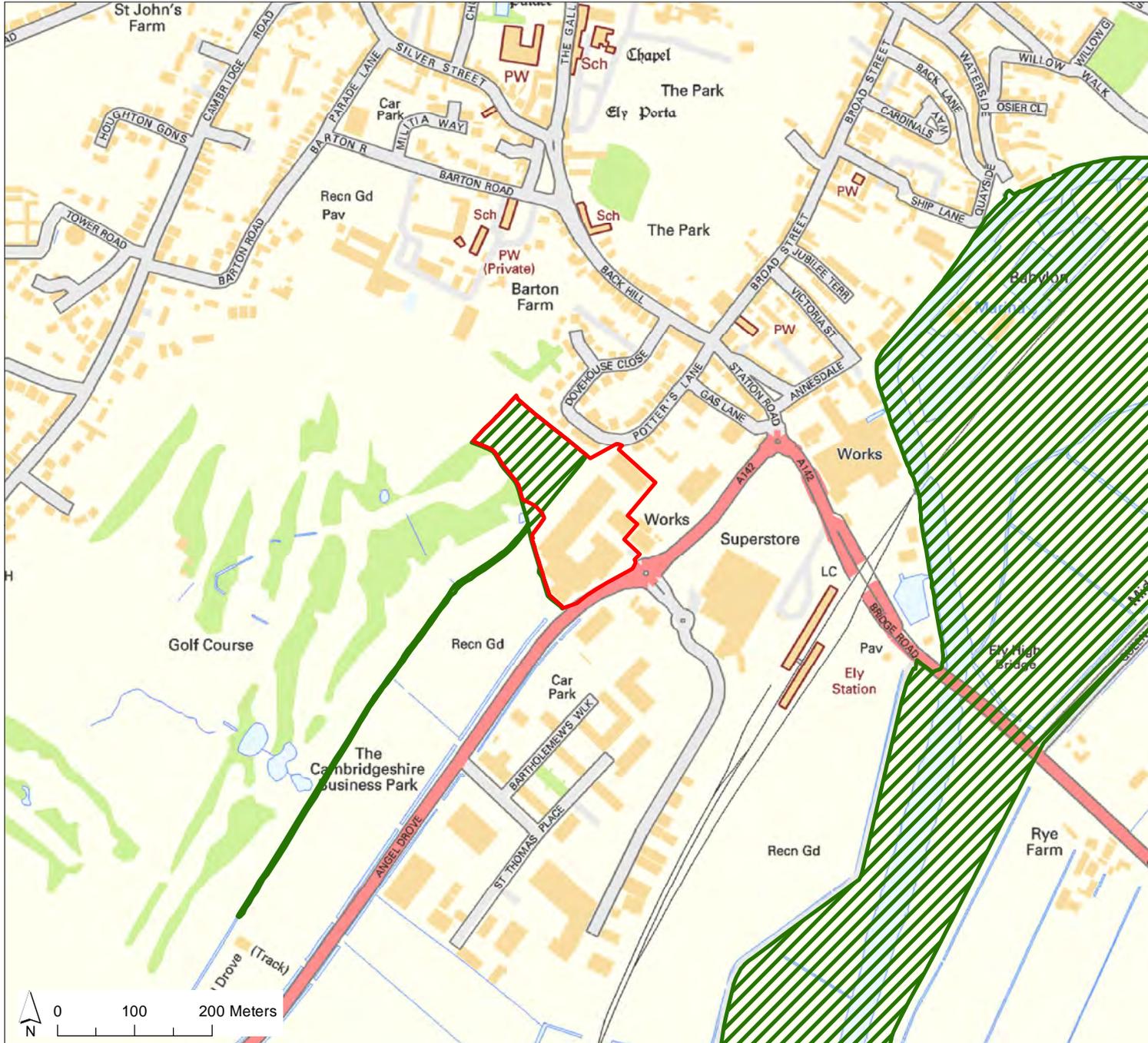


Figure 2.2

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3 Habitat Survey

Survey Approach

- 3.1 An update Phase 1 Habitat Survey of the Site was undertaken by AEL on 29 August 2018. The methodology adopted followed the standard JNCC approach to Phase 1 Habitat Survey (JNCC, 1993⁵) by which all habitats present within the Site were classified and mapped according to standard categories. Target notes were used to describe areas of both typical and unique botanical character, and a list of the higher plant species seen during the survey was compiled. The habitat map was subsequently digitised using a Geographical Information System (ArcGIS).

Findings

- 3.2 The Phase 1 Habitat map is presented in **Figure 3.1**, and a selection of habitat photographs is provided in **Figure 3.2**. A breakdown of the habitat types present is provided in **Table 3.1**, and a list of the plant species recorded is in **Appendix B**.

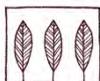
Table 3.1: Habitat types present within the Site.

Habitat type	Area (m ²)		
	Area A	Area B	Total
Amenity grassland	61	448	509
Broad-leaved plantation woodland	-	1,670	1,670
Broad-leaved semi-natural woodland	763	1,677	2,440
Dense scrub	670	315	985
Dense scrub / tall ruderal	2,118	681	2,799
Ephemeral vegetation with reed	1,954	0	1,954
Ephemeral / short perennial vegetation	7,374	0	7,374
Ephemeral vegetation with scrub	2,805	0	2,805
Hard standing and tracks	1,453	256	1,709
Poor semi-improved grassland with scrub	870	-	870
Poor semi-improved grassland / tall ruderal	-	238	238
Tall ruderal	825	4,824	5,649
Total	18,893	10,109	29,002 (2.9 ha)

Area A

- 3.3 The former factory site consisted of cleared ground that has been colonised by ephemeral vegetation and typically formed sparse plant cover over mainly bare compacted soils and made ground. The dominant species overall was creeping bent *Agrostis stolonifera*, but the area supported a relatively diverse mix of species, albeit none of particular individual rarity.

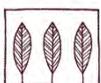
⁵ JNCC (1993) *Handbook for Phase 1 Habitat Survey – A technique for Environmental Audit*. JNCC, Peterborough.



- 3.4 Occasional patches of common reed were also present in areas of impeded drainage, together with bramble and young woody scrub, mixed tall ruderal vegetation (mainly on soil stockpiles) and small marginal patches of species-poor rank grassland.

Area B

- 3.5 The area of Angel Drove Drains CWS coincident with the Westmill Food land holding is dominated by tall ruderal vegetation, with flanks of semi-natural broadleaved woodland along western and southern margins, and a stand of mature poplar plantation in the north. A gravel and mown grassland track crosses through the area from north to south.
- 3.6 The tall ruderal vegetation comprised a dense and unmanaged mix of common coarse grasses and ruderals, including nettle *Urtica dioica*, redshank *Persicaria maculosa*, false oat-grass *Arrhenatherum elatius*, creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, common couch *Elytrigia repens*, hemlock *Conium maculatum*, great willowherb *Epilobium hirsutum*, mugwort *Artemisia vulgaris*, cleavers *Galium aparine* and scattered elder *Sambucus nigra*. Great horsetail *Equisetum telmateia* was also widely distributed and frequent, but overall the area lacked a distinct fen or tall herb-fen component.



Westmill Food Site, Angel Drove, Ely

Habitat map

- Site boundary
- Area A and B boundary
- broad-leaved semi-natural woodland
- broad-leaved plantation woodland
- dense scrub
- tall ruderal
- ephemeral/short perennial
- poor SI grassland with scrub
- poor SI grassland / tall ruderal
- ephemeral vegetation with scrub
- tall ruderal with scrub
- ephemeral vegetation with reed
- amenity grassland
- swamp (reed)
- hard standing
- individual tree (indicative location)
- x scattered scrub

Figure 3.1

Map Scale @ A4: 1:1,650

Surveyed by: RJH

Survey date: 30.08.2018

Drawn by: RJH

Checked by: DP

Status: Final



Figure 3.2: Selection of habitat survey photographs.



(a) Area A – ephemeral vegetation on previous cleared ground



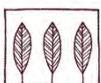
(b) Area A - patches of common reed over ephemeral vegetation



(c) Area A – tall ruderal vegetation on soil bunds



(d) Area A – Low growing patches of bramble scrub





(e) Area B – nettle dominated tall ruderal vegetation



(f) Area B – track with mown grassland margins and small stand of mature poplar woodland



4 Protected Species Surveys

Great Crested Newt

- 4.1 A GCN presence / absence survey of a single pond and ditch located on the western side of the Site (see **Figure 4.1** for locations) was conducted using eDNA water sample analysis (ADAS eDNA kits). Water samples were collected by AEL on the 10 June 2015 in line with the recommended protocol and returned to ADAS for analysis.
- 4.2 The analysis confirmed that no evidence of GCN presence was found in association with the sampled pond or ditch (see ADAS report sheets in **Appendix C**).

Breeding Birds

- 4.3 A three-visit transect based breeding bird survey that covered all parts of the Site was undertaken on 5 and 26 May and 9 June 2015. During each survey, the positions, age, sex and behaviour of all birds detected by sight and sound were plotted on large-scale field maps. Each survey started within half an hour of sunrise to coincide with the peak period of bird activity.
- 4.4 The results of the breeding birds survey are presented in **Table 4.1**, which includes details of the estimated number of breeding pairs from Areas A and B, respectively, and highlights the level of conservation concern for each species recorded.
- 4.5 It is estimated that the Site supported a total breeding assemblage, including species suspected to be nesting within the Site and those not nesting but regularly foraging within the Site, was between 18–24 species. All species were found in small numbers and the majority of were common garden species of no particular conservation significance.
- 4.6 In terms of species of specific conservation concern, Area B supported one or two pairs of red-listed house sparrow *Passer domesticus* and song thrush *Turdus philomelos* although nests of both were probably located just off-Site. Red-listed starling *Sturnus vulgaris* was also recorded within the Site as individual foraging birds that did not appear to breed within the Site or nearby.
- 4.7 One or two pairs of the amber-listed species dunnoek *Prunella modularis* were confirmed in the woodland and scrub straddling Areas A and B, and a single pair of reed bunting *Emberiza schoeniclus* and stock dove *Columba oenas* were possible breeders in Area A. Kestrel *Falco tinnunculus* which is also an amber-listed species, was recorded but did not breed within the Site.
- 4.8 According to standard assessment criteria (Fuller 1980)⁶ the breeding bird assemblage present was of no particular importance with respect to its breeding bird diversity.

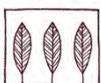
⁶ Fuller, R J (1980). *A Method for Assessing the Ornithological Interest of Sites for Conservation*. *Biological Conservation*, 17: 229–239.



Bat Activity

- 4.9 Two after-dark bat transect and static detector surveys were completed on 20 May and 23 July 2015. Both surveys were conducted by two surveyors, each equipped with a hand-held Pettersson D-230 bat detector with earphones, and an Anabat Express detector. Each surveyor slowly and repeatedly walked a transect route around Areas A and B, respectively. The Area B route was however confined to the central and southern footpaths due to dense and tall vegetation. The transect survey commenced at dusk and continued for 1.5 hrs. Notes on any bats heard or seen were made, including species (where known) behaviour and flight direction.
- 4.10 On both occasions, the transect survey was supplemented by four tripod mounted static Anabat Express detectors (see **Figure 4.2** for detector locations) that were left out for the duration of the transect survey.
- 4.11 The results of the bat activity survey can be summarised as follows:
- Overall bat activity levels were low across Areas B, and very low within Area A.
 - A minimum total of five bat species were recorded, namely common pipistrelle *Pipistrellus pipistrellus*, Soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus*, *Myotis* species and *Nyctalus* species (probably noctule flying high over Site).
 - Bat activity was confined to individual foraging bats, with no obvious signs of significant commuting use.
 - Bat activity in May 2015 was dominated by common and Soprano pipistrelle bats (94% of recorded call files), with the remainder being of *Nyctalus* (6%) and *Myotis* (<1%).
 - Bat activity in July 2015 was dominated by common and Soprano pipistrelle bats (92% of recorded call files), with the remainder being of *Nyctalus* (6%), *Myotis* (2%) and brown long-eared (<1%).
- 4.12 Using standard assessment criteria⁷, the Site is assessed as being of low relative value for foraging bats being of district, local or parish importance in this respect.

⁷ Wray, S, Wells, D, Long, E and Mitchell-Jones, T (2010) *Valuing Bats in Ecological Impact Assessment*. In Practice, December 2010, pp. 23-25.





Westmill Food Site, Angel Drove, Ely

Locations of 2015 GCN eDNA surveys

- Site boundary
- 100 m Site buffer
- sample points

Figure 4.1

Map Scale @ A4: 1:3,500

Surveyed by: RJH
Survey date: 10.06.2015
Drawn by: RJH
Checked by: DP
Status: Final



Table 4.1: Bird species recorded and estimated number of breeding pairs.

Bird species	Level of UK Conservation Concern	Maximum count			Estimated no. of breeding pairs	Breeding status
		Area A	Area B	Site		
House sparrow <i>Passer domesticus</i>	Red	-	3	3	0–1	Possible
Song thrush <i>Turdus philomelos</i>	Red	1	2	2	0–2	Possible
Starling <i>Sturnus vulgaris</i>	Red	-	1	-	0	Non-breeder
Duncock <i>Prunella modularis</i>	Amber	-	2	2	1–2	Probable
Kestrel <i>Falco tinnunculus</i>	Amber	1	-	1	0	Non-breeder
Reed bunting <i>Emberiza schoeniclus</i>	Amber	1	-	1	0–1	Possible
Stock dove <i>Columba oenas</i>	Amber	1	-	1	0–1	Possible
Blackbird <i>Turdus merula</i>	Green	3	3	6	2–4	Confirmed
Blackcap <i>Sylvia atricapilla</i>	Green	3	3	5	3–4	Confirmed
Blue tit <i>Cyanistes caeruleus</i>	Green	2	2	3	1–3	Confirmed
Chaffinch <i>Fringilla coelebs</i>	Green	-	1	1	0–1	Probable
Chiffchaff <i>Phylloscopus collybita</i>	Green	1	1	2	1–2	Probable
Collared dove <i>Streptopelia decaocto</i>	Green	2	2	3	2–3	Probable
Goldcrest <i>Regulus regulus</i>	Green	-	1	1	0–1	Possible
Great spotted woodpecker <i>Dendrocopos major</i>	Green	1	-	1	0–1	Possible
Great tit <i>Parus major</i>	Green	1	-	1	0–1	Possible
Green woodpecker <i>Picus viridis</i>	Green	-	1	1	0–1	Possible
Greenfinch <i>Chloris chloris</i>	Green	1	-	1	0–1	Possible
Lesser whitethroat <i>Sylvia curruca</i>	Green	1	-	1	0–1	Possible
Long-tailed tit <i>Aegithalos caudatus</i>	Green	4	2	6	1–2	Confirmed
Magpie <i>Pica pica</i>	Green	1	-	1	0–1	Possible
Moorhen <i>Gallinago chloropus</i>	Green	1	-	1	0–1	Possible
Robin <i>Erithacus rubecula</i>	Green	5	3	5	2–3	Confirmed
Sparrowhawk <i>Accipiter nisus</i>	Green	-	1	1	0	Non-breeder



Bird species	Level of UK Conservation Concern	Maximum count			Estimated no. of breeding pairs	Breeding status
		Area A	Area B	Site		
Whitethroat <i>Sylvia communis</i>	Green	1	-	1	0–1	Probable
Woodpigeon <i>Columba palumbus</i>	Green	2	4	6	3–4	Confirmed
Wren <i>Troglodytes troglodytes</i>	Green	3	4	7	6–7	Confirmed



Westmill Food Site, Angel Drove, Ely

Locations of static bat detectors

- Site boundary
- Anabat Express detector location

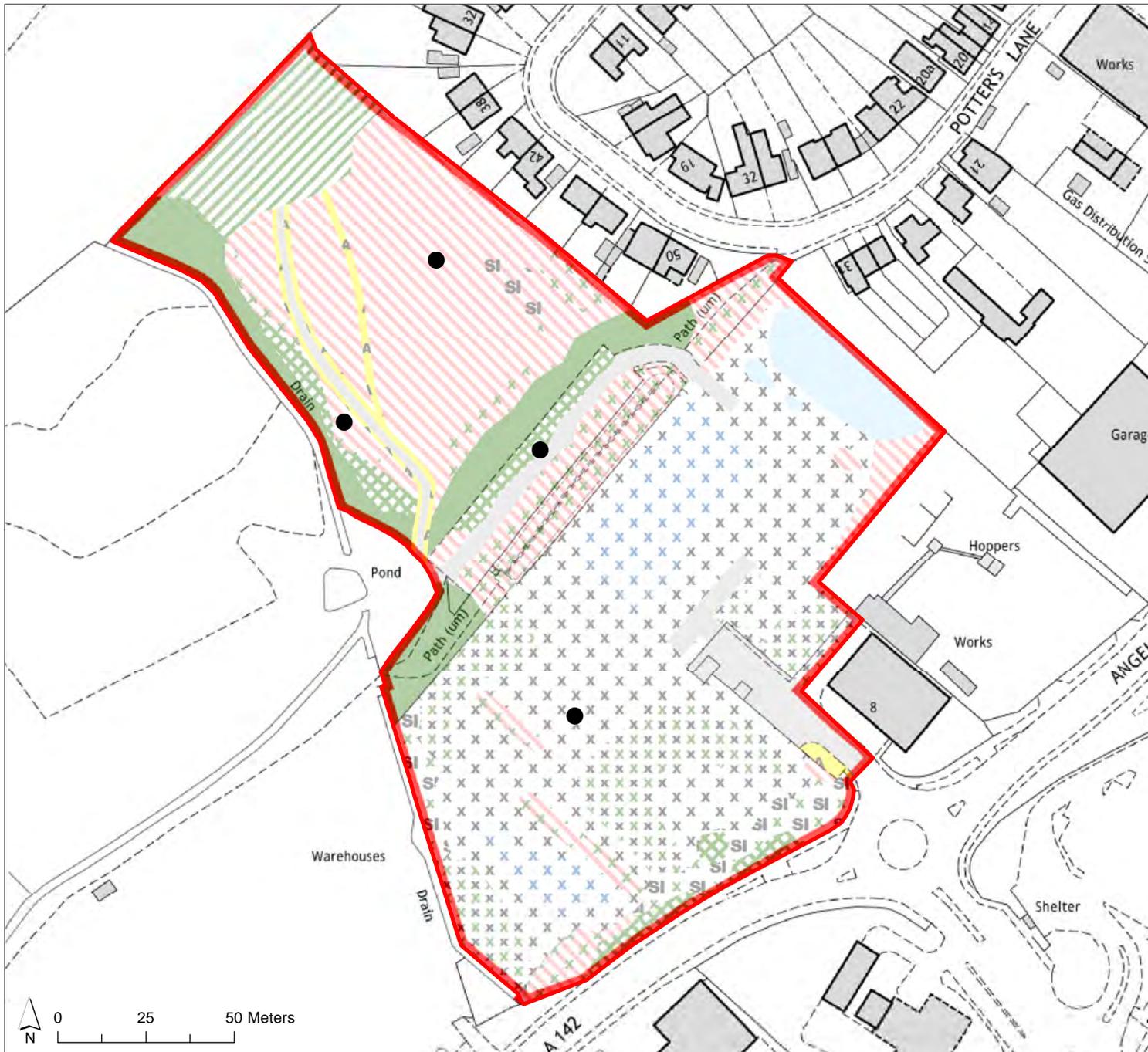


Figure 4.2

Map Scale @ A4: 1:1,650

Surveyed by: RJH

Survey date: May & July 2015

Drawn by: RJH

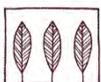
Checked by: DP

Status: Final



5 Discussion and Conclusions

- 5.1 Early successional ephemeral vegetation, damp ground communities and scattered scrub dominated the former factory site (Area A). The area of adjoining waste ground to the north (Area B) was characterised by nettle-dominated tall ruderal vegetation with widely scattered woody scrub, and lacked a distinct fen or tall herb-fen component.
- 5.2 The areas of ephemeral and ruderal vegetation were of low relative value in habitat and botanical terms, with areas of mature woodland considered to be of elevated value at the Site level. No plant species with specific rarity status were recorded from the Site.
- 5.3 Although further surveys would be required to confirm potential protected species interests at the development planning stage, potentially including update reptile, breeding bird and bat activity surveys, the select survey work completed in 2010/11 and 2015 has found no evidence of great crested newts in nearby ponds or ditches, and does not indicate that the Site, including Area B which is part of the Angel Drove Drains CWS, is of significant value in protected species terms. No overriding habitat or protected species constraints to future development have therefore been identified.
- 5.4 AEL have reported previously on the questionable inclusion of Area B as part of the Angel Drove Drains CWS (see **Appendix D**). The findings of the current update survey support the previous conclusion that the area of waste ground (Area B) does not appear to warrant CWS designation on its own merit, and its inclusion as part of the CWS (which is considered by the CWS citation to be a borderline CWS as a whole) is not supported by current CWS selection criteria.
- 5.5 Notwithstanding the current CWS designation and the need for additional species surveys, it is considered entirely feasible that the ecological value of Area B could be retained and enhanced alongside future development proposals assuming that a sympathetic approach to development design and access is adopted and implemented. This might for instance include the retention and enhancement of marginal woodland through supplementary planting and management and new habitat creation such as native grassland margins and wetland as part of any SuDS or drainage requirements. Other species-specific measures could also be considered, such as the provision integrated bird and bat boxes on new buildings and wildlife friendly lighting.



Appendix A

Angel Drove Drains CWS citation



Site Name: Angel Drove Drains

Site Code: E17

Status: County Wildlife Site

Other Designations: Former Site of Natural History Interest

Grid Reference: TL5379

Area (ha): 1.37

District: East Cambridgeshire

Parish: Ely

Survey History:

06/08/1996 County Wildlife Site

21/07/2005 County Wildlife Site

Habitats Present:

Broad Habitat: Open Water, Other, Tall Herb and Fern

Current Qualifying Criteria:

The site includes a hedgerow at least 500m in length and over 2m in width, with 5 or more woody species, and with at least part of the hedgerow allowed to flower and fruit.

Historical Qualifying Criteria:

The site supports a population of a vascular plant species which occurs in 3 or fewer sites in the county (*Equisetum telmateia*).

Site Description:

21/07/2005

The site comprises two minor drains backed by hedgerows and a contiguous area of waste ground. The short drain to north-east of the playing field has a tall straggly hedgerow along its north-eastern bank top. The south-western bank is dominated by tall herb vegetation, Bramble *Rubus fruticosus* and coarse grassland. The ditch bottom is full of emergent vegetation; frequent species include Hairy Willowherb *Epilobium hirsutum*, Common Figwort *Scrophularia nodosa*, Water-cress *Rorippa nasturtium-aquaticum* and the former county rarity Greater Horsetail *Equisetum telmateia*. The longer drain, running from north-east to south-west, lies beside a tall, bushy, rather gappy hedgerow that is allowed to flower and fruit. The height varies from 2m to 8m tall and width from 1m to over 2m. The ditch flora was quite patchy, due to the shading from the adjacent hedgerow, but where light increased, Greater Water Plantain *Alisma plantago-aquatica*, Fool's Water-cress *Apium nodiflorum*, Greater Pond Sedge *Carex riparia*, Branched Bur-reed *Sparganium erectum*, Greater Reed-mace *Typha latifolia* and Common Duckweed *Lemna minor*. Occurred with Gipsywort *Lycopus europaeus*, Hemp Agrimony *Eupatoria cannabinum*, Hairy Willowherb, Butterbur *Petasites hybridus*, Hard Rush *Juncus inflexus* and Marsh Ragwort *Senecio aquaticus*. Greater Horsetail is scattered at the base of the north-eastern part of the hedgerow.

The hedgerow, although very overgrown, is mature, species-rich and allowed to flower and fruit. Hawthorn *Crataegus monogyna* was the dominant species, but Ash *Fraxinus excelsior*, Blackthorn *Prunus spinosa*, Crab Apple *Malus sylvestris*, Field Maple *Acer campestre*, Midland Hawthorn *Crataegus laevigata*, Grey Sallow *Salix cinerea* and Elder *Sambucus nigra* were all recorded. Adjacent to the car park additional species included Hazel *Corylus avellana* and Privet *Ligustrum vulgare*, though the presence of ornamental species suggests that this section may be of more recent origin.

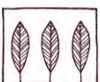
The area of waste ground is bordered to the west by a continuation of both drains and the associated hedgerow. On the other sides it is bordered by the school playing fields, housing and a car park. The vegetation is dominated by tall herb vegetation with significant areas dominated by Greater Horsetail. Other species include a patch of Lesser Pond Sedge *Carex acutiformis*, Common Reed *Phragmites australis*, and significant areas of Hairy Willowherb and Nettle *Urtica dioica*. Patches of Bramble and Elder scrub also occur, with a row of Poplars along the northern boundary and a hedgerow along the southern boundary adjacent to the car park. The underlying geomorphology, soils and hydrology of this area may be of interest as tall herb vegetation more usually associated with swamps and mires occurs on a slope.

06/08/1996

The site comprises two minor drains and a contiguous area of waste ground. The short drain to the northeast of the playing field has a tall straggly hedgerow along its northeastern banktop. The southwestern bank is dominated by tall herb vegetation, *Rubus fruticosus* and coarse grassland. The ditch bottom is full of emergent vegetation; frequent species include *Epilobium hirsutum*, *Scrophularia nodosa*, *Lycopus europaeus* and the county rarity *Equisetum telmateia*. The longer drain, running from northeast to southwest, lies beside a tall, bushy, rather gappy hedgerow that is allowed to flower and fruit. Height varies from 2m to 10m tall. *Equisetum telmateia* is scattered at the base of the northeastern part of the hedgerow. The drain itself was being cleaned at the time of survey; emergent vegetation was very sparse and the water level was very low. The drain is rather shaded by the adjacent hedgerow. Plant species include *Alisma plantago-aquatica*, *Lycopus europaeus*, *Eupatorium cannabinum*, *Scrophularia nodosa*, *Apium nodiflorum*, *Sparganium erectum* and *Equisetum telmateia*. The area of waste ground is adjacent to housing and a car park and is dominated by tall herb and ruderal vegetation. *Equisetum telmateia* is locally abundant in this area.

Appendix B

List of plant species recorded during habitat survey



List of plant species recorded during habitat survey

Latin name	English name	Relative abundance - DAFOR scale, where D=Dominant, A=Abundant, F=Frequent, O=Occasional and R=Rare	
		Area A	Area B
<i>Acer campestre</i>	field maple	-	O
<i>Acer platanoides</i>	Norway maple	R	-
<i>Acer pseudoplatanus</i>	sycamore	R	R
<i>Agrostis capillaris</i>	common bent	R	-
<i>Agrostis stolonifera</i>	creeping bent	A	-
<i>Alliaria petiolata</i>	garlic mustard	-	R
<i>Alnus glutinosa</i>	alder (saps)	R	-
<i>Anisantha sterilis</i>	barren brome	F	-
<i>Anthriscus sylvestris</i>	cow parsley	R	O
<i>Arrhenatherum elatius</i>	false oat-grass	-	F
<i>Artemisia vulgaris</i>	mugwort	R	O
<i>Arum maculatum</i>	Lords and ladies	-	R
<i>Betula pendula</i>	silver birch (saps)	O	R
<i>Buddleja davidii</i>	butterfly-bush	O	-
<i>Calamagrostis epigejos</i>	wood small reed	LA	-
<i>Calystegia silvatica</i>	large bindweed	-	O
<i>Cardamine flexuosa</i>	hairy bittercress	R	-
<i>Carex acutiformis</i>	lesser pond sedge	-	R
<i>Carex hirta</i>	hairy sedge	R	-
<i>Carex otrubae</i>	false fox sedge	R	-
<i>Cerastium fontanum</i>	common mouse-ear	R	-
<i>Cerastium glomeratum</i>	sticky mouse ear	R	-
<i>Cirsium arvense</i>	creeping thistle	F	O
<i>Cirsium vulgare</i>	spear thistle	O	O
<i>Conium maculatum</i>	hemlock	-	R
<i>Conyza canadensis</i>	Canadian fleabane	F	-
<i>Corylus avellana</i>	hazel	-	R
<i>Crataegus monogyna</i>	hawthorn	R	-
<i>Crepis capillaris</i>	smooth hawksbeard	O	-
<i>Dactylis glomerata</i>	cock's-foot	-	O
<i>Daucus carota</i>	wild carrot	O	-
<i>Dipsacus fullonum</i>	wild teasel	R	R
<i>Elytrigia repens</i>	common couch	O	O
<i>Epilobium hirsutum</i>	great willowherb	O	O
<i>Epilobium parviflorum</i>	hoary willowherb	F	-
<i>Epilobium tetragonum</i>	square stalked willowherb	R	-
<i>Equisetum arvense</i>	Field horsetail	R	-
<i>Equisetum telmateia</i>	great horsetail	LA	O
<i>Festuca rubra</i>	red fescue	R	R



Latin name	English name	Relative abundance - DAFOR scale, where D=Dominant, A=Abundant, F=Frequent, O=Occasional and R=Rare	
		Area A	Area B
<i>Fraxinus excelsior</i>	ash	R	O
<i>Galinsoga parviflora</i>	gallant soldier	R	-
<i>Galium aparine</i>	cleavers	O	F
<i>Geranium robertianum</i>	herb-Robert	O	-
<i>Geum urbanum</i>	wood avens	R	-
<i>Glechoma hederacea</i>	ground-ivy	O	-
<i>Helminthotheca echioides</i>	bristly oxtongue	F	-
<i>Hedera helix</i>	ivy	-	R
<i>Heracleum sphondylium</i>	hogweed	-	O
<i>Holcus lanatus</i>	Yorkshire-fog	O	-
<i>Hypericum perforatum</i>	perforate St John's wort	O	-
<i>Hypericum tetrapterum</i>	square-stalked St John's wort	R	-
<i>Juncus articulatus</i>	jointed rush	R	-
<i>Juncus bufonius</i>	toad rush	O	-
<i>Juncus effusus</i>	soft rush	R	-
<i>Juncus inflexus</i>	hard rush	O	-
<i>Lamium album</i>	white dead-nettle	R	R
<i>Lapsana communis</i>	nipplewort	O	-
<i>Lolium perenne</i>	perennial rye-grass	-	O
<i>Malva sylvestris</i>	common mallow	R	-
<i>Medicago lupulina</i>	black medick	F	-
<i>Phragmites australis</i>	common reed	LA	R
<i>Picris hieracioides</i>	hawkweed oxtongue	O	-
<i>Plantago lanceolata</i>	ribwort plantain	R	-
<i>Plantago major</i>	greater plantain	O	-
<i>Poa annua</i>	annual meadow-grass	O	-
<i>Poa trivialis</i>	rough meadow-grass	F	-
<i>Polygonum arenastrum</i>	equal-leaved knotgrass	-	R
<i>Polypogon viridis</i>	water bent	R	-
<i>Populus × canadensis</i>	hybrid black poplar	O	LA
<i>Populus alba</i>	white poplar (saps)	R	-
<i>Prunella vulgaris</i>	selfheal	O	-
<i>Ranunculus repens</i>	creeping buttercup	F	R
<i>Ranunculus sceleratus</i>	celery-leaved buttercup	R	-
<i>Rorippa nasturtium-aquaticum</i>	water-cress	R	-
<i>Rubus fruticosus agg.</i>	bramble	LA	O
<i>Rumex obtusifolius</i>	broad-leaved dock	R	R
<i>Rumex sanguineus</i>	wood dock	R	-
<i>Salix caprea</i>	goat willow (saps)	F	-
<i>Salix fragilis</i>	crack willow (saps)	O	-
<i>Sambucus nigra</i>	elder	R	O

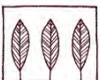


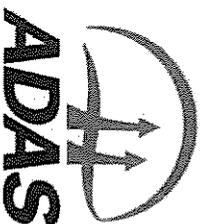
Latin name	English name	Relative abundance - DAFOR scale, where D=Dominant, A=Abundant, F=Frequent, O=Occasional and R=Rare	
		Area A	Area B
<i>Schoenoplectus lacustris</i>	common club rush	R	-
<i>Scrophularia auriculata</i>	water figwort	R	-
<i>Senecio jacobaea</i>	common ragwort	O	R
<i>Senecio vulgaris</i>	groundsel	O	-
<i>Stachys sylvatica</i>	hedge woundwort	R	R
<i>Taraxacum officinale</i>	dandelion	R	-
<i>Trifolium campestre</i>	hop trefoil	R	-
<i>Trifolium pratense</i>	red clover	O	-
<i>Trifolium repens</i>	white clover	O	-
<i>Tussilago farfara</i>	colt's-foot	O	-
<i>Typha latifolia</i>	bulrush	R	-
<i>Urtica dioica</i>	common nettle	LA	D
<i>Veronica beccabunga</i>	brooklime	R	-
<i>Vicia tetrasperma</i>	smooth tare	R	-



Appendix C

GCN eDNA report sheets





Dr Duncan Painter
Applied Ecology Ltd
St Johns Innovation Centre,
Cowley Rd
Cambridge
CB40WS

ADAS Wolverhampton HQ
Pendeford House
Pendeford Business Park
Wobaston Road
Wolverhampton
WV9 5AP

Tel: 01159 516747
Fax: 01159 516415
Email: Helen.Rees@adas.co.uk
www.adas.co.uk

Sample/Report ID: 2015-824
Client Identifier: Pond 1
Date of Receipt: 22/06/15

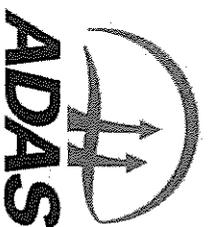
Condition on Receipt: Good Visual Inspection of Volume: Passed
Description: 6x50mL - pond water samples in preservatives
Material Tested: DNA extracted from pond water samples

Determinant	Result	Method	Date of Analysis
Great Crested Newt	Negative	Real time PCR	30/06/15

Report Prepared by:
Signed: [Redacted]
Position: Senior Research Scientist
Date of preparation: 01/07/15

Report Issued by:
Signed: [Redacted]
Position: Team Leader, Biotechnology
Date of issue: 01/07/15

Notes: eDNA analysis was carried out in accordance with the stipulated methodology found in the Technical Advice Note (WC1067 Appendix 5 Technical Advice Note) published by DEFRA and adopted by Natural England.



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Email: Helen.Rees@adass.co.uk

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Sample/Report ID: 2015-823
Client Identifier: Pond 2 (Ditch)
Date of Receipt: 22/06/15

Condition on Receipt: Low Sediment
Description: 6x50mL - pond water samples in preservatives
Material Tested: DNA extracted from pond water samples

Determinant	Result	Method	Date of Analysis
Great Crested Newt	Negative	Real time PCR	26/06/15

Report Prepared by:
Signed: [Redacted]
Position: Senior Research Scientist
Date of preparation: 01/07/15

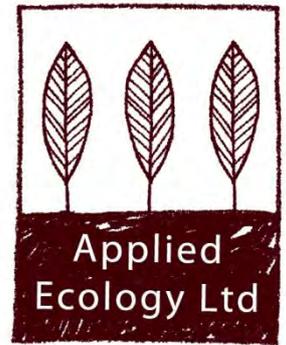
Report issued by:
Signed: [Redacted]
Position: Team Leader, Biotechnology
Date of issue: 01/07/15

Notes: eDNA analysis was carried out in accordance with the stipulated methodology found in the Technical Advice Note (WC1067 Appendix 5 Technical Advice Note) published by DEFRA and adopted by Natural England.

Appendix D

Letter appraisal of Angel Drove Drains CWS (AEL 2014)





David Mills
Head of Group Property
Associated British Foods
50-51 Russell Square
London, WC1B 4JA

Sent by email only

08 September 2014

Dear David

Re: Angel Grove County Wildlife Site, Ely – Ecology Walkover

Further to my walkover survey on 28 July 2014, I am writing to provide you with a summary of my findings and thoughts in relation to the site's current County Wildlife Site (CWS) designation.

The walkover survey covered the entire Angel Drove CWS site, including land coincident with the Westmill's site and the adjoining ditch / hedge within the wider CWS, although access was only gained to the south-eastern side of the hedge/ditch. Notes on the habitats present were made, together with records of the associated plant species and their relative abundance.

Angel Drove CWS Designation

The boundary of Angel Drove CWS and its associated citation (as presented in the East Cambridgeshire District County Wildlife Sites Supplementary Planning Document, June 2010) is provided in **Appendix 1**. The 2010 citation states that the site is a borderline CWS, but it has been included because it supports a species-rich hedgerow with more than five woody species and is allowed to flower and fruit. The associated ditch and tall herb communities were included within the CWS as complementary habitats and because of the urban context of the site. It is of note that the CWS was extended following a CWS review in 2005-9 (as reported in the 2010 Supplementary Planning Document), and I assume that the CWS was extended at this time to include the land area within the Westmill site.

A modified version of the CWS citation was supplied by the Cambridgeshire and Peterborough Environmental Records Centre (CPERC) as part of a data search in March 2014 (**Appendix 2**). The 2014 citation states that the current Qualifying Criteria for Angel Drove CWS is:

"The site includes a hedgerow at least 500m in length and over 2m in width, with 5 or more woody species, and with at least part of the hedgerow allowed to flower and fruit."

And that the historical Qualifying Criteria was:

"The site supports a population of a vascular plant species which occurs in 3 or fewer sites in the county (Equisetum telmateia)."

Survey Findings

The CWS has been divided into two distinct parts for the purpose of the habitat descriptions, namely (1) tall ruderal and woodland habitat associated with the Westmill site, and (2) the hedgerow and associated linear ditch.

Westmill's Site

The area of Angel Drove CWS coincident with the Westmill Foods land holding is dominated by tall ruderal vegetation, with flanks of semi-natural broadleaved woodland along western and southern margins, and a stand of mature poplar plantation in the north and northwest.

The tall ruderal vegetation comprises a dense and unmanaged mix of common coarse grasses and ruderals, including nettle *Urtica dioica*, false oat-grass *Arrhenatherum elatius*, creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, common couch *Elytrigia repens*, hemlock *Conium maculatum*, great willowherb *Epilobium hirsutum*, mugwort *Artemisia vulgaris*, cleavers *Galium aparine* and scattered elder *Sambucus nigra*. Great horsetail *Equisetum telmateia* is also frequent across the area.

Ditch and Hedgerow

The linear drainage ditch runs northeast-southwest and comprises a c.1m deep steep-sided straight channel with 10-20cm of water. It supports a range of marginal and emergent aquatic / damp ground species including great willowherb, hemp-agrimony *Eupatorium cannabinum*, gipsywort *Lycopus europaeus*, lesser water-parsnip *Berula erecta*, common figwort *Scrophularia nodosa*, bulrush *Typha latifolia*, lesser pond sedge *Carex acutiformis*, great horsetail and reed sweet grass *Glyceria maxima*.

The ditch is partially shaded by a more or less continuous hedgerow / narrow woodland fringe along its length. Woody shrub and tree species present include hawthorn *Crataegus monogyna*, Norway maple *Acer platanoides*, ash *Fraxinus excelsior*, sycamore *Acer pseudoplatanus*, dog-rose *Rosa canina*, blackthorn *Prunus spinosa*, crab apple *Malus sylvestris*, field maple *Acer campestre* and a number of willows *Salix* species and hybrids.

Evaluation

According to the current CWS Selection Criteria for Cambridgeshire¹ the hedgerow within Angel Drove CWS does quality for CWS designation, specifically under Criteria 1f) Hedges, which states that “*Hedgerow systems at least 500m in length and more than 2m in width, with 5 or more woody species, and with at least part of the hedgerow allowed to flower and fruit*” qualify for CWS designation.

The ditch that runs parallel to the hedgerow and the area of woodland and tall ruderal vegetation within the Westmill's site do not appear to qualify under any of the current CWS selection criteria, and therefore as stated in the 2010 Supplementary Planning Document, these habitats have been designated as they are complementary and because of the urban context of the site, rather than on their own ecological or biodiversity merits.

¹ Cambridgeshire & Peterborough County Wildlife Sites Panel (Version 5, January 2009). Cambridgeshire and Peterborough County Wildlife Sites: Selection Guidelines.

The inclusion of the ditch within the CWS site appears to have merit in my view given its close association with the hedge. However, the area of designated woodland / tall ruderal vegetation does not have such a close association with the hedgerow. If this habitat type is considered sufficiently important within an urban context to warrant CWS designation this should be reflected by a specific CWS Selection Criterion. At present there are no CWS criteria that elevate a sites importance on the basis of its urban context.

Finally, the historic Qualifying Criteria based on the presence of great horsetail (a species which is common across the current CWS site) is no longer relevant, as this is a common and stable species that is not regarded as a rare species nationally (a species of "Least Concern" on the current and forthcoming national red data lists). In addition, a total of 18 post-1990 records of this species from different locations are included on the online Cambridgeshire Flora Records website, and it is therefore unlikely that this species will be afforded with specific notable local status on the basis of the soon to be published Cambridgeshire Flora.

Summary

In summary, the area of woodland/tall ruderal vegetation within Angel Drove CWS and coincident with the Westmill's site does not appear to warrant CWS designation on its own merit (as acknowledged by the current citation), and its current designation as a complimentary habitat and urban context is not supported by the current CWS selection criteria.

I trust this provides you with a concise summary of my findings.

Yours sincerely,

Rob Hutchinson MCIEEM

On behalf of Applied Ecology Ltd

APPENDIX ONE

Site No. 7119

COUNTY WILDLIFE SITE FULL RECORD SHEETNAME: **Angel Drove drains**

File code: E/19.7.05

Parish(es): Ely

County: Cambridgeshire

Grid ref: TL5379

Habitat information**Code** *Habitat type*

C31 Tall herb and fern: other, tall ruderal

J221 Boundaries, defunct hedge, species-rich

J261 Boundaries, permanently wet ditch

Site Area

1.37 ha

Site description

The site comprises two minor drains backed by hedgerows and a contiguous area of waste ground. The short drain to north-east of the playing field has a tall straggly hedgerow along its north-eastern bank top. The south-western bank is dominated by tall herb vegetation, Bramble *Rubus fruticosus* and coarse grassland. The ditch bottom is full of emergent vegetation; frequent species include Hairy Willowherb *Epilobium hirsutum*, Common Figwort *Scrophularia nodosa*, Water-cress *Rorippa nasturtium-aquaticum* and the former county rarity Greater Horsetail *Equisetum telmateia*. The longer drain, running from north-east to south-west, lies beside a tall, bushy, rather gappy hedgerow that is allowed to flower and fruit. The height varies from 2m to 8m tall and width from 1m to over 2m. The ditch flora was quite patchy, due to the shading from the adjacent hedgerow, but where light increased, Greater Water Plantain *Alisma plantago-aquatica*, Fool's Water-cress *Apium nodiflorum*, Greater Pond Sedge *Carex riparia*, Branched Bur-reed *Sparganium erectum*, Greater Reed-mace *Typha latifolia* and Common Duckweed *Lemna minor*. Occurred with Gipsywort *Lycopus europaeus*, Hemp Agrimony *Eupatoria cannabinum*, Hairy Willowherb, Butterbur *Petasites hybridus*, Hard Rush *Juncus inflexus* and Marsh Ragwort *Senecio aquaticus*. Greater Horsetail is scattered at the base of the north-eastern part of the hedgerow.

The hedgerow, although very over grown, is mature, species-rich and allowed to flower and fruit. Hawthorn *Crataegus monogyna* was the dominant species, but Ash *Fraxinus excelsior*, Blackthorn *Prunus spinosa*, Crab Apple *Malus sylvestris*, Field Maple *Acer campestre*, Midland Hawthorn *Crataegus laevigata*, Grey Sallow *Salix cinerea* and Elder *Sambucus nigra* were all recorded. Adjacent to the car park additional species included Hazel *Corylus avellana* and Privet *Ligustrum vulgare*, though the present of ornamental species, suggests that this section may be of more recent origin.

The area of waste ground is bordered to the west by a continuation of both drains and the associated hedgerow. On the other sides it is bordered by the school playing fields, housing and a car park. The vegetation is dominated by tall herb vegetation with significant areas dominated by Greater Horsetail. Other species include a patch of Lesser Pond Sedge *Carex acutiformis*, Common Reed *Phragmites australis*, and significant areas of Hairy Willowherb and Nettle *Urtica dioica*. Patches of Bramble and Elder scrub also occur, with a row of Poplars along the northern boundary and a hedgerow along the southern boundary adjacent to the car park. The underlying geomorphology, soils and hydrology of this area may be of interest as tall herb vegetation more usually associated with swamps and mires occurs on a slope.

Site assessment

The site is a borderline CWS, though has been included because it supports a species-rich hedgerow with more than 5 woody species that is allowed to flower and fruit. The associated ditch and tall herb communities have been included in the site boundary as complementary habitat and because of the urban context of the site.

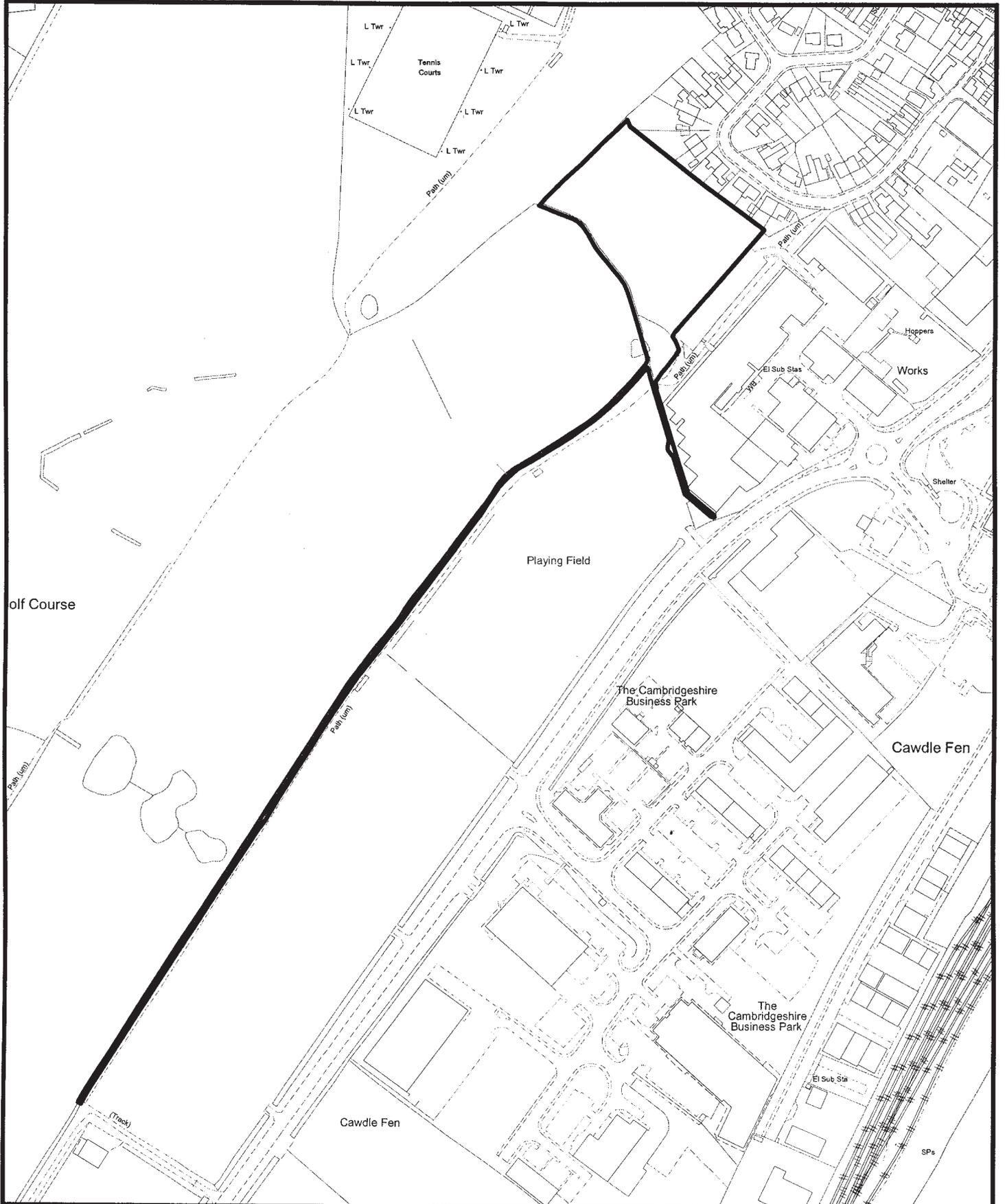
Site status

County Wildlife Site
former Site of Natural History Interest

Surveyor

Martin Baker
19/07/2005

Angel Drove drains



Grid Ref: TL539805
Scale: 1:3500
Plot Date: 20/7/2005
By: Wildlife Trust for CCC

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APPENDIX TWO

Site Name: Angel Drove Drains

Site Code: E17

Status: County Wildlife Site

Other Designations: Former Site of Natural History Interest

Grid Reference: TL5379

Area (ha): 1.37

District: East Cambridgeshire

Parish: Ely

Survey History:

06/08/1996 County Wildlife Site

21/07/2005 County Wildlife Site

Habitats Present:

Broad Habitat: Open Water, Other, Tall Herb and Fern

Current Qualifying Criteria:

The site includes a hedgerow at least 500m in length and over 2m in width, with 5 or more woody species, and with at least part of the hedgerow allowed to flower and fruit.

Historical Qualifying Criteria:

The site supports a population of a vascular plant species which occurs in 3 or fewer sites in the county (*Equisetum telmateia*).

Site Description:

21/07/2005

The site comprises two minor drains backed by hedgerows and a contiguous area of waste ground. The short drain to north-east of the playing field has a tall straggly hedgerow along its north-eastern bank top. The south-western bank is dominated by tall herb vegetation, Bramble *Rubus fruticosus* and coarse grassland. The ditch bottom is full of emergent vegetation; frequent species include Hairy Willowherb *Epilobium hirsutum*, Common Figwort *Scrophularia nodosa*, Water-cress *Rorippa nasturtium-aquaticum* and the former county rarity Greater Horsetail *Equisetum telmateia*. The longer drain, running from north-east to south-west, lies beside a tall, bushy, rather gappy hedgerow that is allowed to flower and fruit. The height varies from 2m to 8m tall and width from 1m to over 2m. The ditch flora was quite patchy, due to the shading from the adjacent hedgerow, but where light increased, Greater Water Plantain *Alisma plantago-aquatica*, Fool's Water-cress *Apium nodiflorum*, Greater Pond Sedge *Carex riparia*, Branched Bur-reed *Sparganium erectum*, Greater Reed-mace *Typha latifolia* and Common Duckweed *Lemna minor*. Occurred with Gipsywort *Lycopus europaeus*, Hemp Agrimony *Eupatoria cannabinum*, Hairy Willowherb, Butterbur *Petasites hybridus*, Hard Rush *Juncus inflexus* and Marsh Ragwort *Senecio aquaticus*. Greater Horsetail is scattered at the base of the north-eastern part of the hedgerow.

The hedgerow, although very overgrown, is mature, species-rich and allowed to flower and fruit. Hawthorn *Crataegus monogyna* was the dominant species, but Ash *Fraxinus excelsior*, Blackthorn *Prunus spinosa*, Crab Apple *Malus sylvestris*, Field Maple *Acer campestre*, Midland Hawthorn *Crataegus laevigata*, Grey Sallow *Salix cinerea* and Elder *Sambucus nigra* were all recorded. Adjacent to the car park additional species included Hazel *Corylus avellana* and Privet *Ligustrum vulgare*, though the presence of ornamental species suggests that this section may be of more recent origin.

The area of waste ground is bordered to the west by a continuation of both drains and the associated hedgerow. On the other sides it is bordered by the school playing fields, housing and a car park. The vegetation is dominated by tall herb vegetation with significant areas dominated by Greater Horsetail. Other species include a patch of Lesser Pond Sedge *Carex acutiformis*, Common Reed *Phragmites australis*, and significant areas of Hairy Willowherb and Nettle *Urtica dioica*. Patches of Bramble and Elder scrub also occur, with a row of Poplars along the northern boundary and a hedgerow along the southern boundary adjacent to the car park. The underlying geomorphology, soils and hydrology of this area may be of interest as tall herb vegetation more usually associated with swamps and mires occurs on a slope.

06/08/1996

The site comprises two minor drains and a contiguous area of waste ground. The short drain to the northeast of the playing field has a tall straggly hedgerow along its northeastern banktop. The southwestern bank is dominated by tall herb vegetation, *Rubus fruticosus* and coarse grassland. The ditch bottom is full of emergent vegetation; frequent species include *Epilobium hirsutum*, *Scrophularia nodosa*, *Lycopus europaeus* and the county rarity *Equisetum telmateia*. The longer drain, running from northeast to southwest, lies beside a tall, bushy, rather gappy hedgerow that is allowed to flower and fruit. Height varies from 2m to 10m tall. *Equisetum telmateia* is scattered at the base of the northeastern part of the hedgerow. The drain itself was being cleaned at the time of survey; emergent vegetation was very sparse and the water level was very low. The drain is rather shaded by the adjacent hedgerow. Plant species include *Alisma plantago-aquatica*, *Lycopus europaeus*, *Eupatorium cannabinum*, *Scrophularia nodosa*, *Apium nodiflorum*, *Sparganium erectum* and *Equisetum telmateia*. The area of waste ground is adjacent to housing and a car park and is dominated by tall herb and ruderal vegetation. *Equisetum telmateia* is locally abundant in this area.

