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Dear Mr Kelly

### **Greater Cambridge Local Plan Regulation 18 Preferred Options 2021 – First Proposals Public Consultation**

Thank you for consulting Natural England on the above in your letter dated 1 November 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **Natural England's key comments**

We are pleased that many of our comments at the Issues and Options stage, in our letter dated 24 February 2020 (ref. 304246), are reflected in the First Proposals Plan, helping to strengthen the Plan's approach to the 'big themes' including climate change, biodiversity and green spaces, wellbeing and social inclusion. Natural England supports the general thrust of the Plan in directing development to where it will have least environmental impact and provide opportunities for enhancements.

Natural England's previous advice highlighted the need for the Plan to address uncertainties relating to water resources and infrastructure needed to support new growth, in light of evidence that current levels of abstraction are already damaging the natural environment. We also signalled the need for the establishment of a strategic green infrastructure network that is resilient to the scale of proposed Plan development, capable of meeting people's needs and addressing adverse impacts to the natural environment. We therefore welcome that the First Proposals Plan recognises the challenges in identifying long-term and interim solutions to the current water resource crisis to enable sustainable development without further detriment to the natural environment. We support the Plan's progress, through the Green Infrastructure Recommendations (LUC, September 2021), in presenting opportunities for the Plan to deliver /contribute towards delivery of strategic green infrastructure.

Notwithstanding the above, Natural England believes significant additional work is required through the next stages of Plan preparation to progress these 'solutions' and demonstrate that development can be delivered sustainably. We have major concerns with the scale of proposed Plan development, and the 2041 timeframe for delivery, given the damage already being inflicted on the natural environment and the lengthy lead-in time for identification and delivery of measures to address the water resource issue and to implement strategic green infrastructure. Some of this Plan development is already progressing, through the adopted strategy, prior to solutions being identified and implemented; the natural environment is already being impacted. The Plan should consider how these impacts and spiralling environmental deterioration can be retrospectively

mitigated.

The section on 'Ensuring a Deliverable Plan – Water Supply' recognises the challenge relating to water resources; however, the Councils need to act urgently, in collaboration with relevant stakeholders, to identify strategic and interim water resource/infrastructure solutions to ensure any level of proposed development is delivered sustainably. There are currently no measures in place to mitigate the adverse effects of current development on the natural environment i.e., more water is being abstracted from the aquifer to serve this development, depleting groundwater resources and causing further declines in the condition of designated sites and supporting habitat.

Potential solutions to address Greater Cambridge's green infrastructure deficit, and the recreational pressure effects of development, lie within the Green Infrastructure Initiatives identified in LUC's Opportunity Mapping Recommendations Report. Natural England fully supports the Initiatives identified; however, these aspirational areas must be progressed into real projects that are happening on the ground by the time the Plan is adopted. Robust Plan policy requirements should secure funding for the delivery and long-term management of these projects from all major development.

We have provided additional comments on the Plan's key themes and policies below; however, reference should be made to the detailed advice provided in our response to the Issues and Options consultation.

### **Vision and aims**

We support the Plan vision and aims for decreases in our climate impacts and increase in quality of life for communities, minimising carbon emissions and reliance on the private car, increases in nature, wildlife, greenspaces and safeguarding landscapes focusing on what is unique to Greater Cambridge embracing bold new approaches.

Natural England strongly recommends that the vision should advocate a more holistic approach to securing multi-functional benefits through the protection and enhancement of the natural environment. In accordance with paragraphs 17 and 109 of the National Planning Policy Framework (NPPF) the Plan should encourage multiple benefits from the use of land in urban and rural areas, recognising that land can deliver a wide range of ecosystem services required for sustainable development including climate change mitigation, flood management, improved water resources and water quality, biodiversity net gain, accessible high quality green infrastructure and associated health and wellbeing benefits, enhanced landscapes and soil resources.

The Plan should contribute to and enhance the natural and local environment by recognising the wider benefits of ecosystem services, considering a natural capital evidence approach and making strong links to the [Nature Recovery Network](#) and the [Cambridge Nature Network](#). National Habitats Network mapping is available to view at [www.magic.defra.gov.uk](http://www.magic.defra.gov.uk).

### **Development Strategy**

The Plan will deliver around 44,400 new homes and provide for approximately 58,500 new jobs. We welcome that the new development strategy aims to meet our increased need for new homes in a way that minimises environmental impacts and improves the wellbeing of our communities. The strategy proposes 19 additional sites for development, along with sites already allocated in the adopted 2018 Local Plans, along with associated infrastructure including green spaces.

We support proposals to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live. The vision includes creating new city neighbourhoods which have the critical mass of homes, jobs and services to create thriving communities, making best use of brownfield and safeguarded land and making the most of public transport links.

Natural England welcomes the use of evidence including the Employment Land and Economic Development Evidence Study and the Greater Cambridge Housing and Employment Relationships

Report to understand the relationship between future jobs and housing growth. We note that these studies found that planning for the standard method housing figure set by government would not support the number of jobs expected to arise between 2020 and 2041. Planning for this housing figure would risk increasing the amount of longer distance commuting into Greater Cambridge, with the resulting impacts on climate change and congestion. On this basis planning for a higher jobs figure and planning for government's standard method local housing need figure have been rejected as reasonable alternatives.

We note that high-level consideration has been given to the potential impacts of COVID-19 on the economy of Greater Cambridge, to inform this First Proposals consultation. We support the proposal to gather evidence to consider the potential longer-term quantitative impacts of COVID-19 prior to the Draft Plan stage to understand any implications for the objectively assessed need for jobs and homes for the plan.

Natural England has no objection in principle to the proposed Plan development strategy; however, this is subject to: 1) the identification of strategic water supply solutions and / or interim measures; and 2) development of deliverable strategic GI initiatives and developer requirements and funding mechanisms being secured through the Plan.

#### Policy S/DS: Development strategy

Figure 6: Map shows proposed sites to be included in the Plan including existing planning permissions alongside a limited number of new sites in the most sustainable locations. We welcome that the sustainability merits, opportunities and constraints for each of the nine potential strategy choices have been considered through the Sustainability Appraisal. Alongside considering the best locations for new homes and jobs, consideration has also been given to the best locations to restore the area's habitat networks and provide more green spaces for people providing health and wellbeing benefits. Natural England fully supports the identification of 14 Strategic Green Infrastructure Initiatives, through the Green Infrastructure evidence, to help achieve this. We welcome the approach to preparing the preferred development strategy / draft allocations and green infrastructure initiatives in parallel.

We support the general policy direction to focus development where it will have the least climate impact, where it can be aligned with active and public transport, opportunities for delivery of green infrastructure and where jobs, services and facilities can be located nearby whilst ensuring all necessary utilities can be provided in a sustainable way. We support the approach to using less land for development to reduce carbon emissions and allow more space for nature and wildlife. The strategy focuses on opportunities to use brownfield land and opportunities created by proposed major new infrastructure.

We note that delivery of the adopted strategy is progressing well with development permitted/underway /completed at the edge of Cambridge sites and new settlement sites including Northstowe and Waterbeach New Town. Natural England is aware that these schemes are being delivered in the absence of adequate sustainable water supply infrastructure to serve the development without adverse impact to the natural environment including statutorily designated sites. Many of these schemes are also unlikely to deliver sufficient level of accessible high quality green infrastructure to meet the needs of new residents without adverse recreational pressure impacts to the existing ecological network including statutorily designated sites. These issues need to be addressed urgently through further stages of Plan preparation as discussed in our advice above and below.

#### **Ensuring a deliverable plan – water supply**

We welcome the Councils' recognition that water supply is a significant issue for the deliverability of the Local Plan and we fully support preparation of the Integrated Water Management Study: Outline Water Cycle (WCS) by Stantec (August 2021) to address this. The WCS has identified the need for new strategic water supply infrastructure, such as a new fens reservoir, to provide for longer term needs, and to protect the integrity of the chalk aquifer south of Cambridge, in addition to a range of interim demand management measures. The draft Sustainability Appraisal also identifies significant environmental impacts if the issue is not resolved. This is a major concern for

Natural England in light of proposed growth levels and the damaging effects that groundwater abstraction is already having on the natural environment including water-dependent designated sites and important chalk stream habitats. Natural England has provided its detailed advice on this matter, and highlighted the statutorily designated sites potentially affected, in our response to the consultation on the WCS. These 'Designated Sites of Concern' are listed in Appendix B of the August 2021 report.

We are aware that Water Resources East is currently preparing its Water Management Plan for the region and that this will help to identify long-term measures to address the issue. However, these strategic measures, including a new fens reservoir, are unlikely to be available until the 2030's hence interim measures are required to enable some level of sustainable growth. We welcome the suggestion of including Plan policies to phase delivery of development that can be supported by a sustainable water supply until new strategic infrastructure is in place; however, it will need to be clearly demonstrated that interim solutions are sustainable and will not cause further environmental decline. The risk is that it may not be possible to demonstrate delivery of the full objectively assessed needs within the plan period.

Natural England appreciates that pressure on water supplies is a regional issue. We share the Councils' aspirations that the water industry, supported by government, will set out its intentions for positively addressing this key infrastructure issue at an early point in the ongoing plan making process, to provide confidence that adequate water supply will be available to support delivery of the preferred options allocations, before the next stage of a full draft Local Plan. In our view the Councils need to act urgently, in collaboration with relevant stakeholders, to identify strategic and interim water resource/infrastructure solutions, including demand management measures, to ensure any level of proposed development is delivered sustainably.

We have serious concerns that Plan development is already being progressed, through the adopted strategy, without sustainable water supply measures in place. More water will be abstracted from the aquifer to serve this development, depleting groundwater resources and causing further declines in the condition of designated sites and supporting habitat. The Plan will need to consider the impacts of this development and identify measures to address adverse environmental impact.

Natural England fully supports the concerns raised by the Environment Agency, as lead authority on this matter, including the high degree of uncertainty as to whether sufficient sustainable water supplies can be provided for the proposed growth over the plan period without further detriment to the natural environment. Further development of the WCS, informed by evidence from regional and water company water resource plans, will need to demonstrate that appropriate deliverable mitigation measures can support sustainable growth until new strategic water supply infrastructure becomes operational. We agree with the Environment Agency that in the face of current challenges it may be appropriate to consider an extended timeframe for delivery of Plan development to limit further environmental degradation until new strategic measures become available. This would allow further time for the identification of truly sustainable options that build in resilience to climate change and robust mitigation and monitoring measures to address impacts to the natural environment and restore habitat condition.

### **Duty to Cooperate**

Natural England welcomes consideration of how the Plan fits with other plans and strategies including cross boundary projects such as the Ox Cam Arc. We support recognition of the Plan to be prepared within a wider regional context noting the Councils' legal duty to cooperate with key stakeholders and surrounding areas of cross boundary issues. We agree that the development of a clear and positive vision for the future of the Greater Cambridge area can help to shape the proposals for the Ox Cam Arc, noting that the outcome of the Oxford-Cambridge framework is currently awaited.

We particularly support the Councils' recognition that the water supply challenge discussed above is a serious issue to be resolved.

Natural England will be pleased to engage with the Councils in the preparation and development of a draft Statement of Common Ground.

### **Transport Strategy**

Natural England welcomes that the proposed strategy is heavily informed by the location of existing and committed public transport schemes. We support the use of transport modelling to understand whether additional infrastructure and policies are required to address the transport impacts of the preferred development strategy.

Transport policies should include requirements for projects to undertake robust ecological impact assessment and application of the ecological mitigation hierarchy.

### **Site allocation policies**

Proposed site allocation policies are described through sections 2.2 – 2.5. Natural England has no objection in principle to the existing and new allocations, areas of major change or opportunity areas being taken forward for development. However, this is subject to:

- identification of strategic water supply infrastructure and/or feasible interim solutions to demonstrate that development can be delivered sustainably and without adverse impact to the natural environment;
- establishment of a framework and robust plan policies to deliver the 14 Strategic Green Infrastructure initiatives ahead of development, to meet development needs and to address the effects of recreational pressure on sensitive sites and habitats.

The site allocation policies will need to include robust requirements to secure delivery of biodiversity net gain and on-site accessible green infrastructure to meet people's need and to contribute towards the Plan's 20% BNG targets and delivery of the Nature Recovery Network / Cambridge Nature Network. Our advice is that major allocation policies should set a framework for development to maximum opportunities for environmental gains.

### **Climate Change**

We welcome the proposed policies relating to net zero carbon and water efficiency, designing for climate change, flooding and integrated water management, renewable energy projects, reducing waste and supporting land-based carbon sequestration. We particularly support the proposed requirement for residential developments to be designed to achieve a standard of 80 litres/person/day; however, we support the Environment Agency's concerns as to whether the Plan is likely to achieve the reductions in demand required to support sustainable growth. As indicated above the WCS will need to demonstrate how water, to meet growth needs, will be supplied sustainably without adverse impact to the natural environment.

Proposed requirements for developments to provide integrated water management, including sustainable drainage systems (SuDS) where possible and for SuDS and green /brown roofs to provide multiple benefits (including biodiversity and amenity) are welcomed.

We support requirements for renewable energy projects to consider impacts on biodiversity, geodiversity, landscape and water quality.

Natural England welcomes a proposed policy to support the creation of land and habitats that play a role as carbon sinks and protect existing carbon sinks from development, particularly peatlands such as those remaining in the north of South Cambridgeshire district. We welcome recognition of the importance of peatlands as a carbon store and the role of other habitats such as woodlands and grasslands, noting loss and degradation of natural habitats results in the direct loss of carbon stored within them.

As indicated above we recommend that the Plan takes a more holistic approach to securing multi-functional benefits for climate change, flood management, water resources and water quality through the protection and enhancement of the natural environment. Natural solutions can achieve significant additional benefits for biodiversity, green infrastructure and associated health and wellbeing benefits, enhanced landscapes and soil resources.

## **Biodiversity and green spaces**

We strongly support the proposed biodiversity and green spaces policies and the inclusion of Figure 53 depicting the existing Greater Cambridge green infrastructure network including designated sites.

We welcome that these policies will help to deliver the aims of the Ox Cam Arc of doubling the area of land managed primarily for nature and to deliver a minimum 20% biodiversity net gain on development sites, beyond the mandatory 10% biodiversity net gain requirements of the Environment Act 2021. We agree that Greater Cambridge has a relatively low level of designated sites and priority habitats, highlighting the need for development to deliver net gains beyond the 10% proposed nationally, hence we are fully supportive of minimum 20% BNG ambitions. Our advice is that the Councils, working with key partners, should identify BNG opportunities through the next phases of Plan preparation. This should take the form of a BNG opportunities / requirements map building on the foundations of the [Nature Recovery Network](#) and the [Cambridge Nature Network](#). National Habitats Network mapping is available to view at [www.magic.defra.gov.uk](http://www.magic.defra.gov.uk).

The Councils should also set a landscape / GI framework for the Site Allocations to maximise opportunities for delivery of GI and BNG within the development sites.

### BG/BG: Biodiversity and geodiversity

Natural England fully supports this policy and requirements for development to achieve a minimum 20% biodiversity net gain, delivered on site where possible and calculated using the Defra Metric 3.0 or its successor. Requirements for off-site measures to be consistent with the strategic aims of the Greater Cambridge green infrastructure network strategic initiatives are welcomed.

The policy should take a natural capital evidence approach and recognise the wider benefits of ecosystem services for climate change, flood risk management, green infrastructure and health and wellbeing, in addition to biodiversity. The main thrust of this policy should be the Plan's contribution to the Nature Recovery Network / Cambridge Nature Network and the establishment of a framework for the development of a Local Nature Recovery Strategy.

We support proposed requirements for development to avoid adverse impact to site of biodiversity or geological importance and development to mitigate recreational pressure on statutorily designated sites, applying Natural England's SSSI Impacts Risk Zones (IRZs). The Plan's biodiversity policy should recognise the hierarchy of international, nationally and locally designated sites across Greater Cambridge. This should be accompanied by a map of the existing ecological network and enhancement opportunity areas to guide site allocations / development away from more sensitive areas and to identify opportunities for developers to deliver net biodiversity gain enhancements.

We welcome that the policy will seek wider environmental net gains. These should focus on measures to restore ecological networks, enhance ecological resilience and provide an overall increase in natural habitat and ecological features.

Reference should be made to the detailed advice provided in our response to the Issues and Options consultation with regard to protecting and enhancing biodiversity including designated sites, priority habitats, ecological networks and priority and/or legally protected species populations. This includes additional detailed advice on embedding biodiversity net gain into the Greater Cambridge Local Plan policies.

### BG/GI: Green infrastructure

We welcome the comprehensive and thorough approach taken in developing the GI evidence base for the Greater Cambridge Local Plan, including the Opportunity Mapping and the identification of 14 Strategic GI initiatives. The multifunctional benefits of GI are fully recognised, as well as the links between GI provision and the delivery of other strategic policy areas including the wider natural environment, sustainable transport and social inclusion. These threads/links



should continue through future drafts to ensure the value of GI for people and the natural environment is fully reflected in the Local Plan.

The Strategic GI initiatives are comprehensive and capture a wide variety of GI opportunities within the 14 proposals; this range of GI elements and habitats will help to maximise benefits for people and nature through the strategic planning and delivery of GI across Greater Cambridge. We support the emphasis given to blue infrastructure in Strategic Initiatives 1 and 2 given the considerable pressures on Cambridgeshire's chalk streams and aquifer from agriculture and development. The Chalk Stream Strategy Report<sup>1</sup> recently published by CaBA identifies a number of recommendations to protect/restore chalk stream habitats, including those in areas of high population density such as Cambridge. This report may be a useful reference in planning and progressing strategic blue infrastructure initiatives as part of the Greater Cambridge Local Plan.

We support the proposed approach to have a distinct GI policy within the Local Plan, rather than a stand-alone SPD. As noted in the Topic Paper, we agree that the policy should require all developments to contribute towards GI and that it should be incorporated into design from an early stage and through all phases of development, with a longer-term plan in place for its management and maintenance. As well as a GI policy, Green Infrastructure should be integrated into other strategic policy areas and Local Plan themes where relevant. This will give weight to the multifunctional role of GI and demonstrate where it can contribute to policy delivery and outcomes (e.g., in climate change adaptation, supporting healthy communities etc). It will also support the role of GI in implementing other mechanisms and tools, such as Biodiversity Net Gain, and may help in targeting and prioritising opportunities for GI creation and enhancement.

In addition to securing GI within individual developments, the Local Plan should also provide a framework for proposals to contribute to / link up with the wider Strategic Initiatives, including the 'dispersed initiatives' 10-14 (e.g., 'Expanding the Urban Forest'). Consideration should also be given to potential join-ups on cross-boundary projects and, in time, how the strategic GI network in Greater Cambridge may contribute to greenspace at the regional level (as one of the 5 Ox-Cam counties). There may also be overlaps with other initiatives, such as the Nature Recovery Network, where Cambridgeshire's GI resource can make an important contribution (such as that highlighted in Strategic Initiative 3 for the Gog Magog Hills and Chalkland fringe).

We note from the Part 2 Recommendations Report that there are several points for further consideration, including the funding mechanisms required to ensure that all developments include GI and contribute towards the strategic initiatives. Funding mechanisms (e.g., developer contributions) should be embedded in policy where required and should be identified as early as possible to ensure that benefits are secured long-term. For example, the policies for major allocations will need to include specific requirements for the funding / delivery of the strategic GI ahead of the developments being occupied so that these are clear from the outset. The report presents a number of potential funding sources, including land use planning obligations (e.g., S106) agri-environment streams (such as ELMS) and any ad-hoc opportunities that may arise through partnership working. The increasing emphasis on nature-based solutions may also bring in new revenue streams to support strategic projects, given that many NBS will require a landscape scale / 'ecosystem' approach. The costings for the delivery of the GI and biodiversity aspects of the Local Plan could be included in the IDP so that the investment required to bring about delivery is clear and transparent from an early stage and factored into development proposals. Given the significant scale of the work required, consideration should also be given to how the land will be secured to deliver the GI initiatives, whether through direct purchase, lease or management agreements. A long-term approach to the management and maintenance of GI (ideally in perpetuity) also needs to be factored in from an early stage.

Alongside its value for natural capital and placemaking, green infrastructure provides alternative natural greenspaces that can help alleviate and buffer recreational pressures on protected sites. We welcome the recognition of the recreational pressure impacts across Greater Cambridge, and

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<sup>1</sup> Catchment Based Approach (October 2021) Chalk Stream Restoration Strategy: Main Report. See: [New strategy launched to protect chalk streams - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-strategy-launched-to-protect-chalk-streams)

the Strategic Initiatives aimed at addressing these (e.g., the Coton corridor and multifunctional GI corridors, Strategic Initiatives 7-8). We support the development of clear policy requirements to address these significant pressures (as suggested in the Topic Paper).

Given the Local Plan's strong emphasis on GI and the widespread benefits that it can achieve, we feel there is clear value in having a recognised GI standard in place. A standard would help to guide and inform GI planning and delivery and provide a consistent benchmark on quality across different scales/locations of development. It would also support the recommendation in the report for a GI-led design approach to new development. A standard could be supported by other documents, e.g., Local Design Guides, to ensure that nature is fully built into design through the provision of high-quality green infrastructure. Natural England is currently developing a Green Infrastructure Framework to set standards for green space and access to natural greenspaces, as well as a Design Guide and mapping data<sup>2</sup> to support this work. We would encourage the use of these resources to guide and inform development of strategic Green Infrastructure and policies for Greater Cambridge. The Framework of GI Standards and products are due for launch in summer/autumn 2022, with a pre-release of the beta mapping and the principles of good green infrastructure in December 2021<sup>3</sup>.

Natural England fully supports the proposed inclusion of policies to improve tree canopy cover, enhance river corridors and protect and enhance open spaces. We advise that robust policy requirements should be included to secure delivery of enhancements through development to ensure the achievement of multi-functional benefits for climate change, biodiversity, water quality, access. As indicated in our comments at the Issues and Options stage tree planting needs to be targeted in appropriate locations and considered in the context of wider plans for nature recovery. Consideration should be given to ecological impacts and the opportunities to create alternative habitats that could deliver better enhancements for people and wildlife, and store carbon effectively. Where woodland habitat creation is appropriate, consideration should be given to natural regeneration, and 'rewilding' for the economic and ecological benefits this can achieve. Any tree planting should use native and local provenance tree species suitable for the location. Natural England advocates an approach which seeks to increase biodiversity and green infrastructure generally, not simply planting of trees, and protecting / enhancing soils, particularly peat soils.

For further advice and guidance on green infrastructure please refer to our comments at the Issues and Options consultation stage.

### **Wellbeing and inclusion**

Natural England is fully supportive of the proposed policies including WS/HD: Creating healthy new developments. Our advice is that the policy should include strong links to the importance of adequate level and quality of accessible green infrastructure for people's physical and mental health and wellbeing.

### **Great places**

Natural England supports the proposed Great Places policies. We welcome the establishment of a Place and Design Quality Panel to conduct a site typologies study to understand, protect, utilise and enhance the valued characteristics of different areas in the plan, with the intention of using this information to raise design standards to ensure development reflects and enhances Cambridge's distinctive landscape and townscape character.

We support Policy GP/LC Protection and enhancement of landscape character. Natural England is pleased to see that the Greater Cambridge landscape character assessments have been updated and will provide an up-to-date evidence base for the development of policy GP/LC. Existing retained policies from the South Cambridgeshire Local Plan NH/1, NH/2 and NH/13 and policy 8 of the Cambridge Local Plan should be reviewed and updated in the light of these updated landscape

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<sup>2</sup> See the GI Framework Mapping Portal: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

<sup>3</sup> [How Natural England's Green Infrastructure Framework can help create better places to live - Natural England \(blog.gov.uk\)](#)



character assessments to ensure they reflect the most recent baseline evidence.

Policy GP/LC seeks to identify, protect and enhance locally valued landscapes. Any locally designated landscapes, e.g., Areas of Greater Landscape Value, should be identified within the plan and given appropriate policy protection to protect and enhance them and to ensure that development reflects their distinctive character. It is not the role of Natural England to define locally valued landscapes – this is for LPAs and their communities. However, it should be noted that NE considers World Heritage Sites designated for their natural interest, local landscape designations and Inheritance Tax Exempt land to be locally valued. Therefore, these areas should be identified and included on policy maps showing locally designated landscapes along with any 'Protected views'.

The Strategic Spatial Options Assessment appears to have considered a wide range of options based on up-to-date evidence on landscape and townscape character considerations. We support this approach which is useful in identifying and considering key landscape issues early in the Plan-making process, to feed into the Sustainability Appraisal. We note that the appraisal of the strategic spatial options is based on the interim draft findings of the emerging Landscape Character Assessment. We trust that the preliminary conclusions will be updated following completion of this work. The analysis also notes that recommendations are provided for strategic landscape mitigation and enhancement for each of the strategic spatial options. Natural England supports the proposal to identify specific mitigation as part of more detailed studies in locating and designing future development.

We are generally supportive of policies to protect and enhance the Cambridge Green Belt, achieve high quality development and establish high quality landscape and public realm.

### **Jobs**

Natural England supports proposed policy J/AL: Protecting the best agricultural land. We welcome recognition of soil as a valuable resource and key element of the environmental ecosystem which requires protection, in accordance with paragraph 174 of the NPPF. We note that the protection of peat soils is addressed under the climate change theme discussed above.

Beyond the wider water resource / supply issue, discussed above, we have no substantive comments on the other proposed policies. However, policies will need to include appropriate requirements to ensure that all development avoids adverse impact to the natural environment and delivers net gains for biodiversity in accordance with the requirements of policy BG/BG: Biodiversity and geodiversity.

### **Homes**

Beyond the wider water resource / supply issue we have no specific comments to make on these proposed policies subject to the inclusion of appropriate requirements to ensure that all development avoids adverse impact to the natural environment and delivers net gains for biodiversity in accordance with the requirements of policy BG/BG: Biodiversity and geodiversity. Residential development should also contribute towards delivery of the Strategic GI Initiatives.

### **Infrastructure**

Natural England supports proposed policy I/ST: Sustainable transport and connectivity for the environmental and health benefits this could achieve including reduced emissions, air quality and climate change benefits.

We have no substantive comments on the other proposed policies subject to the inclusion of appropriate requirements to ensure that all development avoids adverse impact to the natural environment and delivers net gains for biodiversity in accordance with the requirements of policy BG/BG: Biodiversity and geodiversity.

### **Habitats Regulations Assessment (HRA)**

Natural England supports preparation of the HRA Report by LUC (August 2021). We welcome that this incorporates a screening assessment and Appropriate Assessment. The Screening stage

identifies likely significant effects on European sites, either alone or in combination with other policies and proposals, for several plan policies. These include:

- Physical damage and loss (offsite) – in relation to Eversden and Wimpole Woods SAC.
- Non-physical disturbance (offsite) – in relation to Eversden and Wimpole Woods SAC.
- Recreation – in relation to Wicken Fen Ramsar SAC and Fenland SAC.
- Water Quantity and Quality – in relation to Ouse Washes SAC, SPA and Ramsar site, Wicken Fen Ramsar site, Chippenham Fen Ramsar site, Fenland SAC and Portholme SAC.

The Appropriate Assessment concludes no adverse effect on site integrity as follows:

#### Eversden and Wimpole Woods SAC

Subject to the following safeguards and mitigation measures being implemented:

- Completion of bat surveys for site allocations identified with moderate or high potential to support barbastelle to determine the ecological value of these sites in relation to this bat species and to inform specific mitigation proposals.
- There is a commitment in the plan that proposed development will avoid key habitat features likely to be used by this species and to create and enhance suitable habitat for this species.
- It is also recommended that policy wording in the plan is strengthened to include specific inclusion of the safeguard measures detailed above and that Policy BG/BG Biodiversity and geodiversity is strengthened to include specific reference that mitigation provided should be suitable to the level of protection afforded to designated sites.

#### Wicken Fen Ramsar site and Fenland SAC

The Appropriate Assessment concludes no adverse effect on integrity as a result of increased recreational pressure provided that the following safeguards and mitigation measures are required by the plan and successfully implemented:

- A commitment in the plan to ensure that development within 20km of the Ramsar site and SAC to provide sufficient suitable alternative natural greenspace in line with advice from Natural England and that there should be specific detail on the policy on the appropriate quantity and quality of open spaces and how delivery and management in perpetuity will be secured.

The Appropriate Assessment is currently unable to conclude no adverse effect on the integrity of the Ouse Washes SAC, SPA and Ramsar, Wicken Fen Ramsar site, Chippenham Fen Ramsar site, Fenland SAC and Portholme SAC, with regard to water quantity and quality, pending the provision of further evidence through the Greater Cambridge IWMS and the WRE IWMP.

We welcome that the HRA has provided a detailed consideration of air quality impacts, associated with Plan development, for the relevant European sites. This is based on best practice Highways England Design Manual for Road and Bridges (DMRB) LA 105 Air quality guidance and considers the potential for traffic-related emissions on the affected road network based on traffic modelling data, in line with the advice provided by Natural England at the Issues and Options stage. Whilst the assessment has ruled out likely significant effects on all relevant European sites Natural England has been unable to carry out a detailed review of this information and will provide comments at the next stage of Plan consultation.

Please note that Natural England is reviewing the Impact Risk Zone (IRZ) for Eversden and Wimpole Woods SAC to take into account the findings of emerging SAC barbastelle tracking surveys being undertaken for major development schemes. It will also take into consideration the availability of suitable foraging resource which is considered to be quite scarce in the local area. In the meantime, until the IRZ is formally amended, and accompanying guidance prepared, we welcome application of a precautionary 20km buffer zone for SAC barbastelles in line with Natural England's current local guidance.

Natural England is generally supportive of the interim findings of the HRA and will provide further

advice as the HRA is updated in line with the development of Plan policies and further evidence.

### **Sustainability Appraisal**

Through the Sustainability Appraisal (LUC, October 2021) the preferred policy approaches for the Local Plan have been subject to appraisal against the SA objectives. A range of reasonable alternative options has also been assessed, including alternatives to the preferred policy approaches, Strategic Spatial Options and site options. We welcome that the findings of the HRA will be incorporated into the SA and will provide further insight into biodiversity impacts specifically at designated sites, presenting the opportunity to limit adverse impacts at these locations.

We support recognition of the over-abstractation of water in this region as a serious concern. We welcome acknowledgement that action is required now to ensure the availability of water for future uses without detrimental impact on the environment. Natural England agrees that water resource availability and water quality are inter-related and that these are likely to be exacerbated by the effects of climate change.

The new Local Plan presents the opportunity for new development to come forward at the most appropriate locations in order to avoid detrimental impacts on biodiversity assets. However, we support recognition of potential risks to the ecological network including statutorily designated sites, through degradation and other impacts associated with development.

We agree that the new Local Plan provides the opportunity to promote biodiversity gain and to improve the overall ecological network. Natural England also agrees that opportunities identified through the Green Infrastructure Study (2020) could support delivery of Natural England's Habitat Network nearby opportunity zones and support pollinator corridors. Robust plan policies will need to be developed to secure delivery of these enhancements through all relevant development.

The report concludes that overall, the proposed direction of the Local Plan performs well in sustainability terms with a strong focus on providing an appropriate amount of development and policies focused on minimising carbon emissions, particularly through minimising the need to travel, using land efficiently and making the most of existing and planned sustainable transport links. Natural England suggests this is a premature conclusion in the current absence of strategic water supply infrastructure and sustainable interim measures. Development through the adopted strategy is already being progress without these measures in place. Further development of the Green Infrastructure Initiatives is also required to ensure adequate GI to meet development needs and to alleviate recreational pressures on some of our most sensitive sites habitats. Robust plan policies, to secure timely delivery of this strategic green infrastructure, will be required to demonstrate the Plan's sustainability.

We generally welcome the policy recommendations presented within Chapter 5 of the SA report including reference to the mitigation hierarchy within Policy BG/BG: Biodiversity and geodiversity and stronger commitments to protect and enhance biodiversity within this and the site allocation policies. However, in our view SA recommendations should focus on the urgent requirement for the identification of strategic and interim water resource/infrastructure solutions and further work to progress the GI Initiatives into real projects.

Natural England will provide further advice as the SA is updated in line with the development of Plan policies and further evidence.

We hope our comments are helpful. For any queries relating to the specific advice in this letter only please contact Janet Nuttall on 020 802 65894. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

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