

# Greater Cambridge Local Plan Strategic Spatial Options Assessment

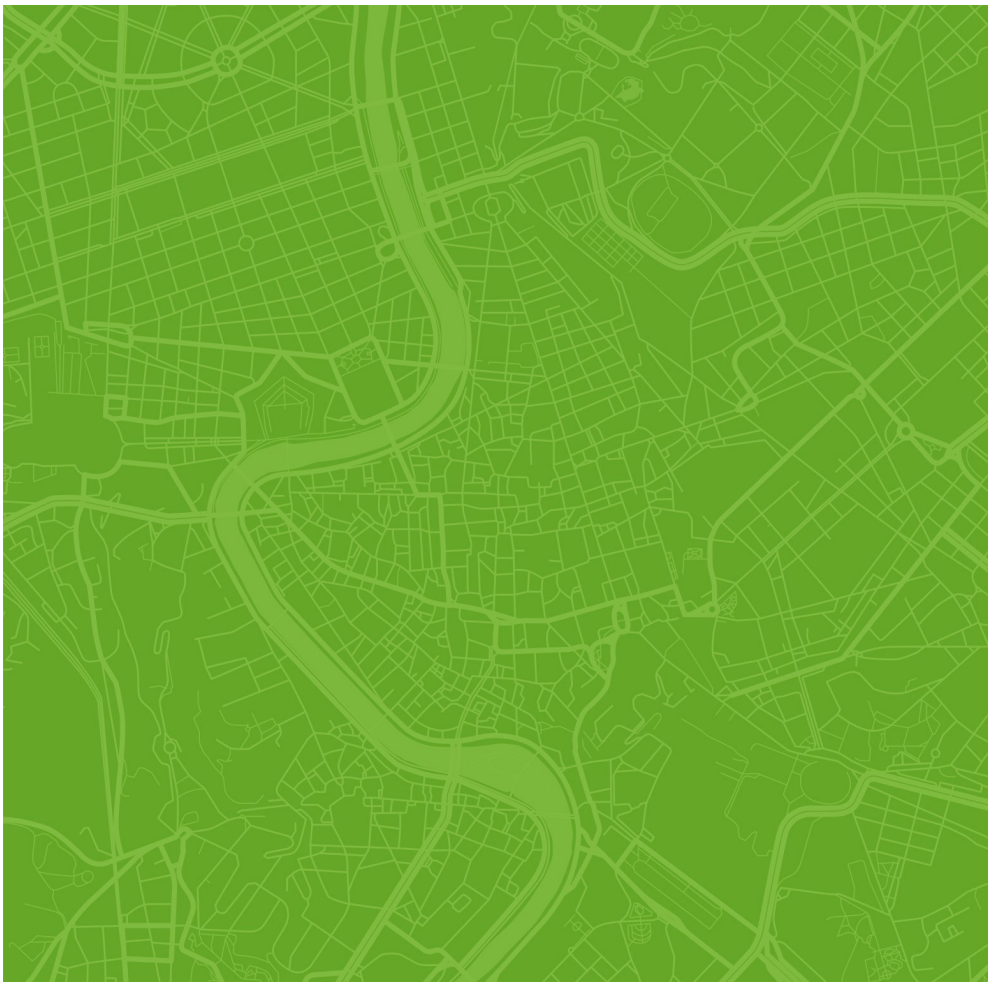
HRA Supplement Report

South Cambridge District Council and  
Cambridge City Council

**Final report**

Prepared by LUC

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1	Draft report for client comment	E. Mayhead	R. Turner	D. Green	05/06/21
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# Chapter 1

## Introduction

**1.1** This Greater Cambridge Local Plan Strategic Spatial Options Assessment: Habitat Regulations Assessment (HRA) Supplement Report assesses with regard to HRA, the working assumption Greater Cambridge Local Plan preferred option development strategy, and a new blended Edge of Cambridge: Green Belt alternative, in the same way as was completed for the strategic spatial options in November 2020.

**1.2** Alongside other evidence assessments and Sustainability Appraisal, consideration of the preferred option and Edge of Cambridge: Green Belt alternative alongside the strategic spatial options assessments ensures consideration of a range of reasonable alternative strategies.

## Context

**1.3** For the strategic spatial options stage, three growth levels and eight strategic spatial options were assessed on a comparative basis.

**1.4** Further to this, ahead of the Preferred Options Plan consultation taking place in autumn 2021, officers from Greater Cambridge Shared Planning on behalf of the two councils provided a working assumption preferred option development strategy, including preferred growth level and distribution assumptions for dwellings, jobs and associated population growth.

**1.5** Note that use of the working assumption preferred option development strategy to inform this evidence base does not confer formal support by either council for that strategy. No decisions will be taken on development strategy assumptions until relevant member committees meet and approve documents for the Local Plan preferred options consultation. Such decisions will be

informed by appraisal of reasonable alternatives. Setting out working assumptions in this and other notes does not prejudice those decisions.

## **Growth level**

**1.6** Following consideration of the November 2020 strategic spatial options evidence bases and Sustainability Appraisal, Greater Cambridge Shared Planning have determined that the medium level of homes associated with the central employment scenario represents the objectively assessed need for homes in Greater Cambridge. Having determined this, the previously assessed alternative growth options of minimum and maximum are no longer considered to represent reasonable alternatives.

**1.7** Further to the above, the Greater Cambridge Local Plan Preferred Option growth level is the medium homes level, including a 1:1 commuting ratio for housing growth generated by additional jobs above those supported by the Standard Method, in line with the councils' aims of limiting longer distance commuting and thereby limiting carbon emissions (described as medium+). Land Use Consultants (LUC), and other evidence base consultants, did not assess the medium+ level of growth for the Strategic Spatial options, but LUC do not consider that rerunning the evidence testing of the strategic spatial options against a new medium+ housing figure would result in materially different outcomes to our November 2020 conclusions.

**1.8** Drawing on the above, this report presents the assessment of the new spatial options of preferred option and Blended Strategy including Edge of Cambridge: Green Belt based on the medium+ growth level, and does not assess the impacts of the previous alternative growth levels in relation to these new spatial options.

## Spatial distribution

**1.9** The Councils' working assumption preferred option is a blended strategy including a number of broad supply locations. To ensure that the preferred option is tested against reasonable alternatives, an assessment of the preferred option blended strategy has been completed, so that it can be compared against:

- the strategic spatial options tested last year
- other reasonable alternative blended strategies.

**1.10** Some of the spatial options tested last year were blended strategies and others not. The Councils reviewed the strategic spatial options tested in November to see whether these included a range of reasonable alternative blended strategies, noting that they don't need to test every possible reasonable alternative. The conclusion to this assessment was that the only alternative blended strategy not yet tested was one including development at Edge of Cambridge: Green Belt. The Councils therefore identified a blended strategy development distribution for this spatial option, which is directly comparable to the preferred option and broadly comparable to the strategic spatial options from November 2020.

## Spatial options tested

- Preferred option growth level: preferred options spatial strategy.
- Preferred option growth level: Blended Strategy including Edge of Cambridge: Green Belt.

## Methodology

**1.11** This Supplement Report assesses the above spatial options using the same methodology as completed for the Greater Cambridge Local Plan

Strategic Spatial Options Assessment: HRA (LUC, 2020). See that report [See reference 1] for further detail.

## Precautionary Principle

**1.12** At this stage, as there are no site-specific boundaries identified for proposed development within each Strategic Spatial Option, a broad assessment of the potential for Likely Significant Effect (LSE) was made. HRA is based on a precautionary principle meaning that where uncertainty or doubt remains about the likely effects of the proposals, a precautionary approach will be applied. This approach assumes LSE unless there is sufficient certainty of no impacts to ensure that the qualifying features of the European sites are fully protected. This precautionary approach has been applied in this review.

## Findings

### A Review of Strategic Spatial Options in relation to each impact

**1.13** The high-level review of the preferred options spatial strategy and blended strategy including Edge of Cambridge: Green Belt is presented in Table 1.1 below. This is based on the set of assumptions, which are set out in the Greater Cambridge Local Plan Strategic Spatial Options Assessment: HRA (2020) and should be referred to whilst considering this information.



## Strategic Spatial Option – Preferred Option Development Strategy

### Broad Description of Spatial Option

**1.14** This option involves development of homes and jobs across Cambridge including an increase in density of development in North East and North West Cambridge. Development of homes and jobs at the edge of Cambridge using land outside of the Green Belt at Cambridge Airport.

**1.15** In addition, an extension to Cambourne involving development of homes and jobs and smaller scale development of homes in existing areas of employment in the southern part of Greater Cambridge and small sites within villages and rural communities across Greater Cambridge.

**1.16** Finally, development of jobs at the edge of the Green Belt at the Cambridge Biomedical Campus and at rural employment locations such as Babraham and B2/B8 on the A14 Corridor.

### Potential for Likely Significant Effects on European Sites

#### Physical Damage and Loss

**1.17** Eversden and Wimpole Wood SAC lies within Greater Cambridge, however as there is a commitment that no development will be permitted within a European site, it can be concluded that this option will not result in a LSE in relation to direct physical damage and loss.

**1.18** However, this option involves development at the edge of Cambridge in the Green Belt at Cambridge Biomedical Campus, development around Cambourne and development at small sites within villages and rural communities across Greater Cambridge. These areas are within the 20km CSZ of barbastelle bat, the qualifying feature of Eversden and Wimpole SAC. Therefore, there is potential for LSE in relation to loss of offsite functional habitat used by qualifying barbastelle bat species of Eversden and Wimpole SAC. This preferred option has the potential to focus development within the CSZ of this species, which is of key importance for maintaining the viability of populations within the SAC.

**1.19** The preferred option involves development at small sites within villages and rural communities across Greater Cambridge. Therefore, there is potential for development within 2km of Ouse Washes SAC, SPA and Ramsar. This could result in loss of offsite functional habitat used by qualifying bird species of the SPA and Ramsar and has the potential to affect the water quality of main rivers and drainage ditches that are hydrologically connected to Ouse Washes which could result in the loss of functionally linked habitat of spined loach, the qualifying feature of Ouse Washes SAC.

**1.20** All other European sites were situated outside of the broad areas of proposed development and therefore no LSE was considered.

## **Non-physical Disturbance**

**1.21** The small site developments within villages and rural communities across Greater Cambridge have the potential to result in non-physical disturbance of qualifying features of Eversden and Wimpole Woods SAC if these are located within 500m of the European site. As the locations of these developments are unknown, and in-line with a precautionary approach further evidence is required to determine LSE in relation to non-physical disturbance. Additionally, the developments at the edge of Cambridge in the Green Belt at Cambridge Biomedical Campus and at rural employment locations have the potential to focus development within the CSZ used by this species and result in non-

physical disturbance to offsite functional habitat used by qualifying barbastelle species of Eversden and Wimpole Woods SAC.

**1.22** As this preferred option includes development at small sites within villages and rural communities, there could be development within 2km of Ouse Washes SAC, SPA and Ramsar, which has the potential to result in LSE due to non-physical disturbance of spined loach and qualifying bird species using habitats within the European site and functionally linked habitat outside of the European site. The remaining European sites lie over 500m from the areas where development is proposed and were therefore not considered to result in an LSE.

## **Non-toxic Contamination**

**1.23** No European sites lie within broad areas of proposed development.

**1.24** In relation to the development of small sites within villages and rural communities across Greater Cambridge, there may be potential for LSE upon the Ouse Washes SAC, SPA and Ramsar due to non-toxic contamination.

**1.25** Additionally, there is potential for non-toxic contamination to occur in relation to offsite functional habitat used by the qualifying barbastelle species of Eversden and Wimpole Woods SAC. Therefore, there is potential for LSE to occur in relation to this European site.

## **Air Pollution**

**1.26** This preferred option will result in a significant increase in development within Cambridge, particularly in relation to North East and North West Cambridge, and across Greater Cambridge.

**1.27** Although, the preferred option has the potential to reduce people travelling to Cambridge and will encourage the use of sustainable modes of transport, it is

likely that proposed development within Cambridge and across Greater Cambridge will result in increased vehicle traffic to strategic roads in the district and wider area. Therefore, there is potential for LSE to occur as a result of air pollution in relation to Devil's Dyke SAC, Ouse Washes SAC, SPA and Ramsar and Portholme SAC, which lie within 200m of a strategic road.

## Recreational Disturbance

**1.28** Proposed development within the preferred option lies within the zone of potential risk and ZOI of the following sites:

- Eversden and Wimpole Woods SAC;
- Ouse Washes SAC, SPA and Ramsar;
- Devil's Dyke SAC;
- Portholme SAC;
- Fenland SAC; and
- Wicken Fen Ramsar.

**1.29** There is potential for LSE to occur in relation to these European sites as a result of recreational disturbance.

## Water Quality and Quantity

**1.30** An increase in development in strategic growth areas proposed within the preferred option have the potential to result in an LSE on Ouse Washes SAC, SPA and Ramsar, Wicken Fen Ramsar, Chippenham Fen Ramsar and Fenland SAC.

**1.31** Further evidence is required to determine the potential impact of this option.

## **Strategic Spatial Option – Blended Strategy including Edge of Cambridge: Green Belt**

### Broad Description of Spatial Option

**1.32** This blended option involves development of homes and jobs across Cambridge including an increase in density of development in North East and North West Cambridge. Development of homes and jobs at the edge of Cambridge using land not in the Green Belt at Cambridge Airport.

**1.33** It involves development of homes and jobs at sites at the edge of Cambridge Green Belt and also development of jobs at Cambridge Biomedical Campus, which is at the edge of the Green Belt.

**1.34** In addition, the smaller scale development of homes in existing areas of employment in the southern part of Greater Cambridge and small sites within villages and rural communities across Greater Cambridge.

### Potential for Likely Significant Effects on European Sites

#### **Physical Damage and Loss**

**1.35** Eversden and Wimpole Wood SAC lies within Greater Cambridge, however as there is a commitment that no development will be permitted within a European site, it can be concluded that this option will not result in a LSE in relation to direct physical damage and loss.

**1.36** However, this blended option involves development at the edge of Cambridge Green Belt at Cambridge Biomedical Campus and at other non-site specific locations at the edge of the Green Belt. In addition, development at small sites within villages and rural communities across Greater Cambridge. These areas are within the 20km CSZ of barbastelle bat, the qualifying feature of Eversden and Wimpole SAC. Therefore, there is potential for LSE in relation to loss of offsite functional habitat used by qualifying barbastelle species of Eversden and Wimpole SAC. This option has the potential to focus development within the CSZ of this species, which is of key importance for maintaining the viability of populations within the SAC.

**1.37** This option involves development at small sites within villages and rural communities across Greater Cambridge. Therefore, there is potential for development within 2km of Ouse Washes SAC, SPA and Ramsar. This could result in loss of offsite functional habitat used by qualifying bird species of the SPA and Ramsar and has the potential to affect the water quality of main rivers and drainage ditches that are hydrologically connected to Ouse Washes which could result in the loss of functionally linked habitat of spined loach, the qualifying feature of Ouse Washes SAC.

**1.38** All other European sites were situated outside of the broad areas of proposed development and therefore no LSE was considered.

## **Non-physical Disturbance**

**1.39** The small site developments within villages and rural communities across Greater Cambridge have the potential to result in non-physical disturbance of qualifying features of Eversden and Wimpole Woods SAC if these are located within 500m of the European site. As the locations of these developments are unknown, and in-line with a precautionary approach further evidence is required to determine LSE in relation to non-physical disturbance. Additionally, the developments at the edge of the Green Belt including at Cambridge Biomedical Campus and rural employment locations have the potential to focus development within the CSZ used by this species and result in non-physical

disturbance to offsite functional habitat used by qualifying barbastelle species of Eversden and Wimpole Woods SAC.

**1.40** As this blended option includes development at small sites within villages and rural communities, there could be development within 2km of Ouse Washes SAC, SPA and Ramsar, which has the potential to result in LSE due to non-physical disturbance of spined loach and qualifying bird species using habitats within the European site and using functionally linked habitat outside of the European site if development is within 2km. The remaining European sites lie over 500m from the areas where development is proposed and were therefore not considered to result in an LSE.

## **Non-toxic Contamination**

**1.41** No European sites lie within broad areas of proposed development.

**1.42** In relation to the development of small sites within villages and rural communities across Greater Cambridge, there may be potential for LSE upon the Ouse Washes SAC, SPA and Ramsar due to non-toxic contamination.

**1.43** Additionally, there is potential for non-toxic contamination to occur in relation to offsite functional habitat used by the qualifying barbastelle species of Eversden and Wimpole Woods SAC. Therefore, there is potential for LSE to occur in relation to this European site.

## **Air Pollution**

**1.44** This blended option will result in a significant increase in development within Cambridge, particularly in relation to North East and North West Cambridge, and also across Greater Cambridge.

**1.45** Although, this blended option has the potential to reduce people travelling to Cambridge and will encourage the use of sustainable modes of transport, it is likely that proposed development within Cambridge and across Greater Cambridge will result in increased vehicle traffic to strategic roads in the district and wider area. Therefore, there is potential for LSE to occur as a result of air pollution in relation to Devil's Dyke SAC, Ouse Washes SAC, SPA and Ramsar and Portholme SAC, which lie within 200m of a strategic road.

## Recreational Disturbance

**1.46** Proposed development within this blended option lies within the zone of potential risk and ZOI of the following sites:

- Eversden and Wimpole Woods SAC;
- Ouse Washes SAC, SPA and Ramsar;
- Devil's Dyke SAC;
- Portholme SAC;
- Fenland SAC; and
- Wicken Fen Ramsar.

**1.47** There is potential for LSE to occur in relation to these European sites as a result of recreational disturbance.

## Water Quality and Quantity

**1.48** An increase in development in strategic growth areas proposed within this blended option have the potential to result in an LSE on Ouse Washes SAC, SPA and Ramsar, Wicken Fen Ramsar, Chippenham Fen Ramsar and Fenland SAC.



**1.49** Further evidence is required to determine the potential impact of this blended option.

## Chapter 2

# Conclusions and Next Steps

**2.1** This supplementary document has been produced to provide guidance on the potential for likely significant effect upon European sites that may arise from the preferred option development strategy, and new blended Edge of Cambridge: Green Belt alternative. Due to the high-level nature of the review, it is not possible at this stage to determine, which option is least harmful in relation to potential likely significant effect upon European sites.

**2.2** A review of each option identified the following potential likely significant effects upon European sites as summarised below.

- Preferred Option Development Strategy and Blended Strategy including Edge of Cambridge: Green Belt
  - Physical Damage and Loss (offsite): Eversden and Wimpole Woods SAC, Ouse Washes SAC, SPA and Ramsar.
  - Non-physical Disturbance: Eversden and Wimpole Woods SAC, Ouse Washes SAC, SPA and Ramsar.
  - Non-toxic Contamination: Eversden and Wimpole Woods SAC, Ouse Washes SAC, SPA and Ramsar.
  - Air Pollution: Devil's Dyke SAC, Ouse Washes SAC, SPA and Ramsar and Portholme SAC.
  - Recreation: Eversden and Wimpole Woods SAC, Ouse Washes SAC, SPA and Ramsar, Devil's Dyke SAC, Portholme SAC, Fenland SAC and Wicken Fen Ramsar.
  - Water Quality and Quantity: Ouse Washes SAC, SPA and Ramsar, Wicken Fen Ramsar, Chippenham Fen Ramsar and Fenland SAC.

**2.3** The conclusions of this assessment are broadly the same as the previous assessment 'Greater Cambridge Local Plan Strategic Spatial Options

Assessment: Review of Strategic Spatial Options in relation to HRA' (2020). The review has identified a range of potential likely significant effects for each option. As this is a high-level review of potential impacts and the options are very similar, with the only difference being that the preferred option includes an extension to Cambourne and the blended option includes development within the Green Belt, the potential for LSE is broadly similar for both options. Further evidence is required to determine which option presents a greater risk overall to the European sites.

## Next Steps

**2.4** This high-level review of options in relation to HRA has concluded that there is potential for LSE with regards to both options. The option to be taken forward in plan making will require a Likely Significant Effect test, also known as Screening Assessment, and an Adverse Effect on Integrity (AEoI) test, also known as Appropriate Assessment, once additional evidence is available. A HRA will be required as the strategic spatial options are developed, as part of the plan making process. This will need to be informed by relevant evidence base documents, as required and may include the following:

- Road traffic modelling data
- Air quality modelling; and
- Water cycle study.

## References

- 1 LUC (2020) [Greater Cambridge Local Plan Review of Strategic Spatial Options in relation to HRA.](#)

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