

# Consultation Statement

## Appendix 6: Response to Representations - SA/HRA



### Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026)



GREATER CAMBRIDGE  
SHARED PLANNING

# Summaries of Draft Plan Representations, and Response to Main Issues Raised

## Sustainability Appraisal and Habitats Regulations Assessment

### **Abbreviations**

PC= Parish Council DC= District Council TC= Town Council

### Summary of Main Issues:

### Comments on the Sustainability Appraisal:

Comments primarily focus on choices made around the allocation of specific sites. It was challenged whether the Sustainability Appraisal justified the approach to development in villages. Also, that reasonable alternatives for higher growth levels or release of Green Belt on the edge of Cambridge had not been adequately assessed. Comments questioned whether the appraisal had considered housing market absorption issues, the role of grey belt, and the impacts of higher jobs growth. Also, whether alternatives had tested different density and layout approaches to maximising transport mode shift. Some comments questioned individual scores and the assessment results from the Housing and Economic Land Availability Assessment. Some comments sought clarity on why sites were rejected, including why sites at smaller villages were not assessed, or why grey belt sites were not appraised. Historic England noted the assessment identified a number of uncertain effects. They requested that some sites policies were not grouped together in the assessment, and that summary tables and recommendations should be provided.

### Comments on the Habitats Regulations Assessment:

National Trust requested that the outcome of the HRA is more closely reflected in the Local Plan with regard to control of recreational pressure on protected sites. Natural England raised issues around the assessment of water issues, seeking greater clarity. A number of comments said that the HRA should consider the in-combination effects with the East West Rail project.

### Response to Representations:

Comments have been reported to the consultants who carried out the assessments, for consideration when preparing the assessments of the Proposed Submission Local Plan. Detailed responses to comments and how they have been addressed are provided in Appendix A of the Sustainability Appraisal and Appendix F of the Habitats Regulations Assessment.

### Table of representations:

#### Representations on the Sustainability Appraisal

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Object, the Sustainability Appraisal supports:	205124 (Endurance Estates)

<ul style="list-style-type: none"> <li>• The Southern Cluster's potential to enhance housing location relative to employment centres and provide new services, which is endorsed by Endurance Estates.</li> <li>• Endurance Estates advocates for a balanced growth strategy in the district's villages to maintain essential services, expressing concern that the current strategy overlooks necessary growth in the Southern Cluster. It is not considered that this choice is robustly justified by the SA.</li> <li>• Endurance Estates promotes Land East of Gazelle Way (Site ID 115222, HELAA ID 40250) for a large mixed-use development, highlighting its sustainability and potential benefits from planned investments, despite it not being proposed for allocation. The Sustainability Appraisal has assessed the East of Gazelle Way scheme positively, yet it remains unallocated, while the allocation of Cambridge East is supported along with its proposed mitigations.</li> </ul>	
<p>Object, concerns with the SA:</p> <ul style="list-style-type: none"> <li>• Failure to adequately assess the full breadth of reasonable alternatives, particularly in relation to land release from the Green Belt near Cambridge.</li> <li>• The inadequacy of the SA risks the overall soundness of the plan and must be urgently rectified.</li> </ul>	206865 (Endurance Estates)
<p>SA and Rural Centres:</p> <ul style="list-style-type: none"> <li>• The Southern Cluster, which the SA confirms includes Linton, amongst other Rural Centres, Minor Rural Centres and Group Villages with 'very good' public transport access. This is a significant factor in planning considerations.</li> </ul>	206866 (Endurance Estates)

<p>Land at Cambridge Road, Gt Shelford (Site reference 115766, previous HELAA Site ID -2023- 40413)</p> <p>A number of site assessment scored need to be updated to reflect the sustainability of the site, including the overall 'Suitability Score' is currently rated RED, which the respondent contests, arguing that a GREEN score is more appropriate based on submitted evidence. This is critical to ensure that the site has been properly considered through the Sustainability Appraisal and consideration of Reasonable alternatives. The respondent emphasises that the site is standalone and should not be linked to another site being promoted for a larger housing development.</p>	<p>204978 (Great Shelford Ten Acres LLP)</p>
<p>We note that many of the policies are assessed as having significant positive or minor positive effects. However, there are quite a number of policies where effects re assessed as uncertain.</p> <p>It would appear that some of the site allocations have been grouped together for assessment (e.g. City sites). This means that is it very difficult to see what the effects of particular site allocation policies would be. We expect future iterations of the SA to consider each site. The SA would benefit from an overall summary table. It would be helpful if the SA included a series of clear recommendations for the Regulation 19 version of the Plan.</p>	<p>210302 (Historic England)</p>
<p>In my opinion (given the severity of the climate crisis), all new housing developments should be required to have Air Source Heat Pumps (ASHPs) rather than gas boilers in future. I know some local authorities make this a requirement so there is NO excuse for us not to, especially as central government has bottled out of making a decision to do this.</p>	<p>207501 (FutureIN)</p>
<p>Given that Cambridge has been branded one of the most unequal cities in the UK, I also believe that those profiting from its growth should be made to contribute to those in need. I therefore suggest that</p>	<p>207502 (FutureIN)</p>

<p>social value plans be made mandatory for all developments above a certain value (say £5m construction value), and that these plans must include a commitment to employing apprentices and contributing to local charities.</p>	
<p>S/GF: Land adjacent to A11 and A1307 at Grange Farm: Since Little Abington will be separated from the site solely by the A1307, the objective referred to in Para 5.196 is impossible to achieve in respect of that village</p>	<p>208113 (Sawston PC)</p>
<p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). The Council should ensure that the results of the SA process conducted through the preparation of the Local Plan clearly justify the policy choice made, including proposed site allocations (or decisions not to allocate sites) when considered against reasonable alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected.</p>	<p>208327 (Gladman Developments)</p>
<p>JMS Planning notes that production of a Sustainability Appraisal is a live and ongoing process throughout the production of an emerging Local Plan. With this in mind, JMS Planning would like to underline the importance of the Council considering 'reasonable alternatives' at all consultation stages in order to comply with Article 5(1) of the Directive. JMS Planning recommends that further information be provided to substantiate the consultation draft SA regarding the assessment of reasonable alternatives, and specifically the role that the rural areas surrounding Group Village settlements and above can have in enabling sustainable development.</p>	<p>208670 (Guilden Morden Developments Ltd)</p>

<p>The Sustainability Appraisal (October 2025) evaluates spatial options against several objectives, referring to Appendix E for the full assessment and justification of the strategy adopted. JMS Planning disagrees with the proposition in the Development Strategy Topic that if Group Villages do not have a train station then they should be removed from the Development Strategy (paragraph 5.220) The approach of curtailing growth in the rural area to those that are designated as neighbourhood plan areas or those settlements with 'very good' public transport links is a potential unnecessary narrowing of locations suitable for sustainable development. Spatial strategies involving smaller settlements can positively contribute to the plan's resilience and implementation. It is questionable as to why settlements with good access to public transport are removed from the development strategy for the area.</p>	<p>208702 (Guilden Morden Developments Ltd)</p>
<p>The results of the SA will need to explain clearly why some policy options have progressed and others have been rejected through a comparative and equal assessment of all reasonable alternatives. Although the Council have considered a range of alternatives, it should be noted that no assessment has currently been undertaken concerning Grey Belt land. Paragraph 148 of the current Framework states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed and then other Green Belt locations. The Council has considered the release of Green Belt land but not Grey Belt land, and therefore this should be considered as a reasonable alternative to help inform the proposed spatial strategy.</p>	<p>208896 (Nightingale Land and Hill Residential)</p>
<p>The Sustainability Appraisal (October 2025) prepared by LUC recognises the benefits of accommodating growth in close proximity to Cambridge and places a strong emphasis on delivering</p>	<p>210225 (Vistry Group)</p>

<p>an appropriate quantum and mix of housing. Vistry and The Quay Estate maintain that opportunities such as Fen Ditton perform well against these objectives, benefiting from proximity to existing services and facilities, whilst also being of a scale capable of delivering its own complementary infrastructure and contributing meaningfully to the delivery of the development strategy. An appendix with alternative SA scoring is provided.</p>	
<p>The Development Strategy contained within Policy S/DS focuses on the creation and extension of new settlements and strategic sites, with smaller scale development limited to only Melbourn, Duxford and Caldecote. This is not in accordance with the provisions of paragraph 73 of the NPPF and this approach is not justified within the Sustainability Appraisal (SA). GCSP should revisit their Development Strategy to identify site allocations across the Rural and Minor Rural Centres to ensure an effective distribution of growth on small and medium sites can be delivered in the early years of the plan period.</p>	211095 (GW Balaam & Son)
<p>The Sustainability Appraisal 2025 raises concerns about development 'jumping' the green belt, leading to less accessibility to services and facilities, contradicting the Plan's Vision and NPPF sustainability principles.</p>	211100 (Miller Homes)
<p>The Sustainability Appraisal which supports the Regulation 19 Draft Local Plan must consider Grey Belt allocations as an alternative scenario should the Authority require greater levels of growth, which may include a review of Green Belt release to accommodate additional allocations.</p>	208230 (Corpus Christi College Cambridge)
<p>SA also does not adequately address the options for growth in relation to affordable housing as it does not reflect the "very acute" need identified in the Iceni Paper. The viability issues of larger sites which could result in lower affordable housing levels being provided are stated to be offset by smaller</p>	211527 (Endurance Estates)

<p>developments, however there are very limited smaller, sub strategic level, sites being allocated. This needs to be addressed with some more dispersed allocations in sustainable Minor Rural Centres with good sustainable transport options.</p> <p>The inclusion of Branch Road, Comberton (HELAA Site ID 40316) would be entirely in accordance with making the most of existing and planned sustainable transport links, and as currently drafted the Local Plan fails to make the most of the sustainable transport in and around Comberton, existing and planned, including the Greenway, East West Rail and the Cambourne Cambridge Busway.</p>	
<p>Choices around the spatial distribution of development is relevant to considerations of market absorption. Cambridge Housing Delivery Study Addendum (October 2025) raises this issue. It is unclear how this is factored into the Sustainability Assessment when assessing different strategic options.</p>	<p>211598 (LGH Hotels Management Ltd)</p>
<p>Sustainability Appraisal at 4.26 notes that “larger developments could result in a lower level of affordable housing provision due to greater costs to deliver additional infrastructure, but this may be offset overall by smaller sites coming forward within the other sources of supply in this option.” To this end, there is no real acknowledgement in the Sustainability Appraisal as to the role that the Golden Rules (notably the provision of 50% affordable housing) would have as an assessed alternative. Through the Sustainability Appraisal scoring development in the Green Belt is marked as lower scoring as it is not considered as being an “efficient use of land.” There is a general lack of depth to the way in which the Sustainability Appraisal seeks to grapple with options that would involve development of the Grey Belt. We would question if such an assessment criteria appropriately reflects</p>	<p>211601 (LGH Hotels Management Ltd)</p>

<p>where national Green Belt policy has moved to, notably Grey Belt. It would be appropriate for the Sustainability Appraisal to distinguish between options that would involve Green Belt vs those that would involve the use of Grey Belt.</p>	
<p>The Sustainability Appraisal seems to “mark down” Green Belt sites on the edge of Cambridge (which we would assume Bar Hill could fall under) as “as applications cannot be ‘twin-tracked’ alongside plan making due to the need to demonstrate very special circumstances for Green Belt release.” We are unaware of any provisions that would prevent this twin tracking taking place and have had experience in doing this with other local planning authorities.</p>	<p>211602 (LGH Hotels Management Ltd)</p>
<p>The Spatial Options assessed includes: Spatial Option 9a; - Spatial Option 10a; Spatial Option 11a; Spatial Option 11b. Reviewing the description at Paragraph 4.17 of the Sustainability Appraisal (2025) it is clear that relatively limited/no development in the villages is a constant across all four options. Whilst appreciating that it is not necessary for soundness for a Sustainability Appraisal to assess every single reasonable option, given the concerns mentioned in other aspects of the evidence base around market absorption rate associated with relying on larger, strategic developments as well as their delivery rates (due to reliance on infrastructure) an option assessing more mid-ranged size development (i.e. 200 – 700) would seem a reasonable alternative to assess.</p>	<p>211603 (LGH Hotels Management Ltd)</p>

<p>The Sustainability Appraisal of the draft GCLP (October 2025) sets out the background to the reasonable alternatives that have been considered for the overall quantum of housing and job growth underpinning Policy S/JH, including the rationale (this is separate to the reasonable alternatives that are tested for the spatial distribution of growth, which are set out earlier in the SA in Chapter 4). Within the SA (p.178) GCSP set out that draft Policy S/JH is the preferred option in terms of overall growth quantum because it meets the minimum standard method and the 'most likely' job growth scenario.</p> <p>The assertion that the higher jobs forecast is not 'reasonable' is not consistent with the EHNU and other evidence of economic growth potential set out previously. Furthermore, excluding it on the basis that it is 'not the most likely scenario' does not withstand basic scrutiny; applying this logic, any SA would only test one scenario - the most likely - which is clearly not the purpose of SA. Given the 'high' job growth is only c.25% above the 'central' (which can be considered a baseline level of job growth, since it would arise based on the minimum amount of housing that must be provided in any event), it is clear that the 'high' job growth scenario represents a reasonable alternative that should have been tested through the SA. Update the SA to include alternative, higher, housing and job growth scenarios.</p>	211665 (Smithson Hill)
<p>The [2011] Census shows that for people commuting into Greater Cambridge from elsewhere, the vast majority – nearly 80% - travel by car (this actually rises to 84% when people who travel as passengers are included). Although the completion of East-West Rail might be expected to achieve some shift in commuting patterns, this will only occur insofar as (1) housing development outside Greater Cambridge is focused on areas where EWR stations are proposed, and (2) those people</p>	211666 (Smithson Hill)

travel to employment opportunities in Greater Cambridge that are accessible via EWR stations.

It should be noted that East-West Rail would be unlikely to impact the Rural Southern Cluster, where the Site is located, due to the areas it serves. The same two points are true for other transport initiatives, such as the Cambridge South East Transport (CSET) programme. On this basis EWR (and other initiatives) are still fundamentally unlikely to shift the balance of in-commuting into Greater Cambridge away from the private car being the predominant mode of transport. This is especially true for employment centres (such as research campuses) that are spread across the rural part of South Cambridgeshire. A strategy in which employment growth in Greater Cambridge is not matched by commensurate housing growth within the area will therefore almost certainly result in an increase in in-commuting to Greater Cambridge, the majority of which will be by private car, with knock-on impacts on traffic/congestion, air quality, climate change and overall quality of life.

For these reasons, we also dispute the finding of the SA regarding the overall development strategy in Policy S/JH, which states “the housing target is supported by a substantial level of job growth in the area, which is likely to help support self-containment and minimising long distance commuting, as Greater Cambridge residents will be able to benefit from nearby employment opportunities” (SA para 5.30). The substantially higher levels of job growth likely to be generated by the draft GCLP will clearly not result in self-containment given they are not matched by an equivalent level of housing, as set out above.

<p>Grange Farm did not appear in the 2021/22 Call for Sites and appears to fill the gap left by the Cowley Road wastewater site, which remains a far more sustainable brownfield option and is publicly stated to be expected to come forward in time. Other potential locations, including land at Six Mile Bottom and more distributed growth across surrounding villages, should be properly reconsidered.</p>	<p>211719 (J Clifford)</p>
<p>What other options have been considered if there is genuinely a need for additional housing specifically in the Abington area?</p> <p>It is well understood that there is a need for housing in the region in general: I myself (and I suspect the vast majority of residents in local villages) fully appreciate this, and would be supportive of appropriate and locally sensitive developments.</p>	<p>211727 (P Seddon)</p>
<p>Camcycle has reviewed the Sustainability Appraisal that accompanies the Plan and it clearly fails to reflect the transport-related carbon consequences of different spatial choices. In particular, it does not meaningfully distinguish between locations with fundamentally different potential for walking, cycling and public transport, and therefore risks treating very different places as broadly equivalent in sustainability terms. The Sustainability Appraisal acknowledges that transport is a major contributor to emissions, but it does not robustly compare the lifetime transport impacts associated with dispersed, car-dependent growth versus compact, well-connected urban locations. Nor does it test credible alternative scenarios where land use, density, layout and connectivity are deliberately designed to maximise mode shift. This weakens the link between the Plan's climate objectives and its spatial strategy and makes it harder to justify difficult but necessary choices.</p>	<p>211762 (Camcycle)</p>

## Representations on the Habitats Regulation Assessment

Summary of issues raised in comments	Comments highlighting this issue
<p>HRA: Should a Local Plan be likely to have significant effects on European habitats or species, the LPA should undertake a Habitats Regulation Assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). The Sustainability Appraisal should also take the findings of the HRA into account (as per the PPG, paragraph 11, ID11-011-20140306).</p>	<p>208671 (Guilden Morden Developments Ltd)</p>
<p>With regards to Recreational Pressure, Section 6 of the Council's HRA states that the Appropriate Assessment concluded no adverse effect on integrity as a result of increased recreational pressure in relation to Wicken Fen Ramsar site, Fenland SAC and Eversden and Wimpole Woods SAC provided that the following safeguards and mitigation measures are required by the plan and successfully implemented. However, this commitment has not been explicitly included in the draft Local Plan. The wording of policy BG/BG should be amended to include the wording and updated Zone of Influence: "Any development within 10.7 kilometres of Wicken Fen Ramsar site and Fenland SAC and within 5 kilometres of Eversden and Wimpole Woods SAC will include the provision of alternative natural greenspace, specifically designed and managed to alleviate visitor pressure on these Habitats sites".</p>	<p>211086 (National Trust)</p>
<p>We advise that the HRA and AA should assess water quality impacts to protected sites in greater detail (4.117 onwards), and consider protected sites on an individual basis (as has been done for water quantity at 4.110 onwards). The impacts to sites will vary based on their current condition and capacity to cope with changes. We acknowledge that the HRA necessarily has to be at a fairly high</p>	<p>207641, 207642, 207643, 207644, 207645 (Natural England)</p>

level, but it still needs to be robust. Our main concerns are in relation to Portholme SAC and the Ouse Washes.

- Additionally, from 5.71 onwards, we advise that the HRA requires more detail and separation of water pollution impacts to the Upper Ouse catchment and the Cam and Ely Ouse catchment. Development that depends on a Sewage Treatment Works that drains into the Upper Ouse catchment will affect the Ouse Washes, which is currently failing its water quality targets.
- The HRA references the Stantec report (Greater Cambridge Integrated Water Management Study (IWMS) from Stantec) but it is not clear which Sewage Treatment Works / Water Recycling Centres (StW / WRC) are in scope here. For example, Utton's Drove StW effluent drains into the Ouse and so will flow into the Ouse Washes. Uttons Drove WRC serves significant growth areas including Cambourne and Northstowe and currently has considerable issues, according to the IWMS.
- The Non-Toxic Contamination (which can contribute to nutrient enrichment) (4.41 onwards), and Direct pollution / run-off section of the HRA (4.123) both use '500m from a Habitats site' as the screening distance. We do not agree with this methodology, and strongly recommend that the screening is reviewed with the criteria '500m from any waterway that is hydrologically connected to a Habitats site'. This may bring some sites into consideration, particularly in relation to Portholme SAC and the Ouse Washes which are already suffering from pollution and nutrient issues.

<ul style="list-style-type: none"> <li>We agree that Eversden and Wimpole Woods SAC should be included in the AA, particularly in relation to ‘Physical Damage and Loss of Habitat – Functionally Linked Habitat’ and ‘Non-Physical Disturbance – Functionally Linked Habitat’. We note however that a 10km screening distance has currently been used (pages 32, 36). As mentioned in our recent discussions, Natural England’s Impact Risk Zone (IRZ) for this SAC is about to be updated to a 6km core sustenance zone (CSZ) and a 10.2km landscape connectivity zone (LCZ) for barbastelle bats. We will share the final IRZ wording with you, once it has been confirmed for the next IRZ update, and will arrange further discussions about this with the Natural Environment team shortly</li> </ul>	
<p>The Local Plan fails to comply with the Habitats Regulations 2017 and UK law in that the HRA for Eversden and Wimpole Woods SAC does not list or consider all the relevant development proposals which, in combination and cumulatively with those in the GCLP, pose threats which may adversely affect the integrity of the SAC and its CSZ. Major infrastructure transport plans and projects are serious omissions, including EWR which alone could extinguish the SAC’s Barbastelle bats. We consider that the HRA undertaken by LUC for the GCLP is lacking in the evidence necessary to inform a robust Appropriate Assessment.</p>	<p>203638, 203645 (Cambridge Approaches)</p>
<p>HRA: The Local Plan’s reliance on East West Rail (EWR) for development north of the A428 lacks an assessment of EWR’s impacts on the Eversden Woods and Wimpole Special Area of Conservation (SAC), raising concerns about environmental constraints being overlooked. Other HRAs prepared elsewhere (e.g. Oxfordshire) have included the cumulative effects of EWR.</p>	<p>202014 (Haslingfield PC), 210927 (Great Shelford Parish Council)</p>

<p>The proposed EWR route risks habitat fragmentation for the barbastelle bat population, with existing evidence suggesting that limited mitigation measures like bat bridges may not be effective in preserving the integrity of the SAC.</p> <p>The Local Plan assumes that effective mitigation solutions for EWR will be developed later, without evidence of their feasibility or cost, which undermines the plan's effectiveness.</p> <p>EWR Co and GCSP have not demonstrated compliance with the Habitats Regulations, as EWR's impacts have not been adequately assessed in the Local Plan, contradicting national policy requirements and going against the precautionary principle. Local naturalists are willing to engage with GCSP to provide insights on the barbastelle bat population and its implications for the planning process.</p>	
<p>Although the HRA acknowledges that it is important to consider “in-combination effects” (its paragraph 3.24) it does not consider the EWR project, a strategic project on which the development at North Cambourne is said to depend, which has the potential to impact significantly the Eversden and Wimpole Woods SAC. This deficiency must be remedied. In responding to EWR's 2024 non-statutory consultation, both SCDC and Cambridgeshire County Council expressed significant concerns about EWR’s proposals and their potential adverse impact on the maternity roost of rare barbastelle bats at the SAC. We are assuming that neither GCSP nor its constituent local authorities want to see this rare population wiped out - there is no evidence that captive breeding is possible and the bats cannot be moved.</p>	210927 (Great Shelford PC)

<p>The respondent believes the Habitats Regulations Assessment is incomplete, particularly in its failure to consider the in-combination effects of the East West Rail project, which could significantly impact the Eversden and Wimpole Woods SAC. Concerns have been raised by both South Cambridgeshire District Council and Cambridgeshire County Council regarding the potential adverse effects of East West Rail on the maternity roost of rare barbastelle bats. The respondent references a 2012 paper indicating that barbastelle bats do not rely on linear landscape features for commuting, suggesting that proposed bat bridges and viaducts may be ineffective. The respondent advocates for a tunnel solution for East West Rail to protect the bats' habitat during construction.</p>	<p>204841 (A Sykes)</p>
---	-------------------------