Greater Cambridge Local Plan: Proposed Submission Plan

Sustainability Appraisal Appendices A and B

Cambridge City Council and South Cambridgeshire District Council

Final report

Prepared by LUC

July 2026

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Appendix A
Consultation comments

A.1 This Appendix sets out the consultation comments received in relation to consultation on the previous stages of SA, i.e.:

- SA Scoping Report (December 2019);
- SA Report for Issues and Options (December 2019);
- SA Report for First Proposals (Regulation 18: Preferred Options) (November 2021); and
- SA Report for Draft Local Plan (Regulation 18) (November 2025).

A.2 For the Scoping and Issues and Options stages, the bullet points below set out the comment received and the sub-bullet points set out how the comment was addressed within the November 2021 SA Report for the First Proposals, or if no action was taken, why not.

A.3 Given the volume of consultation comments received in relation to the November 2021 SA Report at the First Proposals stage, the decision was taken to group, summarise and respond to similar representations by theme. This approach aimed to reduce the length of the SA Report appendices and avoid unnecessary repetition.

A.4 The consultation comments relating to the SA of the Draft Local Plan (Regulation 18) are set out in the same way as for the Scoping and Issues and Options stages.

SA Scoping Report (December 2019)

Martin Grant Homes (MGH)

- The MHCLG document of March 2019 titled 'Oxford-Cambridge Arc' is a joint declaration of ambition entered into by the Government and local partners envisages substantial growth in the Arc. It establishes a target of building up to 1 million homes by 2050. These homes are necessary to deliver the Governments industrial strategy, which envisages increased productivity in order to boost economic growth and prosperity, and to deliver higher incomes (p14, ibid). To date, no local authority within the Arc has provided for any additional growth in their local plans above the standard housing requirement that would assist in reaching this target. The Greater Cambridge Plan should recognise and accommodate part of this wider growth. If it does not do so, it will

set a precedent for other local authorities within the Arc (such as the highly productive city of Milton Keynes) to lower their ambitions, and the Government's strategy for increased growth will fail.

  - LUC response: The Scoping Report recognises the ambitions of the Oxford-Cambridge Growth Arc as part of the context (e.g. para 2.22 of the Scoping Report onwards).

- Housing affordability is a key issue for equality both nationally and more significantly, within Greater Cambridge. It is also an international issue. International companies able to offer better living standards with a smaller portion of wages needed to pay for living accommodation can tempt workers from the UK to other destinations across the globe. The government and local authorities recognise in the Oxford- Cambridge Arc document that median house price to median income ratio has been increasing across the UK, and increasing more significantly across the Arc. Savills estimates that for its economic potential to be reached, 9.6 million sqft of business floor spaces is needed across the Arc, with 680,000 homes beyond the existing pipeline. If the Arc is to deliver its employment potential, housing affordability must be addressed through the building of significant numbers of homes.
  - LUC response: Housing affordability is recognised as a key issue in Table 3.3 of the Scoping Report.
- It is noted that connectivity is a key theme of the government-local authority declaration on the Arc. Transport connections are key to the allocation of new development in sustainable locations. 3.6. Protection of the environment is a key theme running though all legislation relating to development planning. A requirement for net-gain in biodiversity does much to ensure that delivering growth is not at the cost of the environment. The Cambridgeshire and Peterborough Strategic Spatial Framework (CPSF) and the Cambridgeshire Local Transport Plan (CLTP) are referenced as a key development plan document in the Scoping Report. This document has considerable overlap with the preparation of the Greater Cambridge Local Plan. The Sustainability Appraisal should prefer policies and allocations that ensure links are made between the ambitions of the CPSF and the proposed transportation projects in the CLTP. Transportation matters and traffic generation should be key issues for the SA to consider, and to inform the Greater Cambridge Local Plan.
  - LUC response: Connectivity is addressed via SA objectives 2 (access to services and facilities), 12 (climate change mitigation) and 13 (air quality). A number of the SA objectives relate to environmental factors, and biodiversity is addressed via SA objective 5 (biodiversity and geodiversity). The role of the SA is to assess the likely sustainability effects of the plan and options -

considering compatibility with other planning documents is outside the scope of the SA.

- Population, Health and Wellbeing. The scoping report correctly notes that the delivery of services and facilities (and access to them without recourse to a car) is an issue of health and equality. This should favour larger sites able to deliver access to such infrastructure when the sustainability appraisal of sites is carried out.
  - LUC response: The SA will be carried out in line with the methodology set out in the Scoping Report. Table A1.1 of the Scoping Report recognises that larger scale development could potentially incorporate the provision of new services. However, the SA will not automatically favour larger sites as it is uncertain at what size, which facilities will be provided and other sites may also have good access to existing services and facilities.
- One of the key issues for the delivery of housing in Greater Cambridge is the need to deliver large numbers of homes as quickly as possible, as set out in the Greater Cambridge Housing Strategy 2019- 2023, which notes the key priority to 'increase the delivery of homes, along with sustainable transport and other infrastructure …'. Consideration should be given to the ability of existing sites to deliver additional homes quickly, when considering options for densification, or additional delivery at locations already committed for development.
  - LUC response: Identification of reasonable alternatives is a matter for the Council as plan-makers. Nevertheless, this is covered by the densification option in the Issues and Options document.
- Table 3.1 in this section provides an interesting comparison of development locations, identifying that the majority of growth in current Local Plans is to be provided on the edge of Cambridge, with a significant number being delivered in the Cambridge Urban Area, and the total number of completions, commitment and new sites in the rural areas amounting to more development than that proposed for new settlements or at Cambourne (an urban extension). The Sustainability Appraisal should consider this balance of locations very carefully. In order to maximise sustainability and reduce carbon emissions, new development should be located where: -
- There are good public transport links;

  - Where there is employment within walkable distance;

  - Where leisure and retail facilities are within walking distance;

  - Where existing facilities and services can be complemented with new facilities.

- LUC response: The sustainability appraisal considers these points via SA objectives 2 (access to services and facilities), 12 (climate change mitigation) and 13 (air quality). 'Where existing facilities and services can be complemented with new facilities' is not included in the framework or assumptions. This is because it is unknown what new facilities a development would provide and how relevant areas would be identified (which is likely to be subjective).

- Health

  Guidance from the NHS and wider international research indicates that the provision of green open spaces has a linear relationship with activity levels, and a direct correlation with health. Larger sites able to deliver both incidental open spaces and good access to strategic formal sports and parkland will therefore offer better outcomes for population health. This should be factored into the Sustainability Appraisal of potential development sites.

  - LUC response: SA objective 4 (health) includes consideration of open space and green infrastructure, as set out in the SA Framework (Table 11.1 in the Scoping Report). In order to ensure the SA flags any potential issues and assesses all sites on the same basis, it will not make assumptions about the green infrastructure to be provided at various sites.

- Air and Noise Pollution

  The Scoping Report correctly identifies that air and noise pollution are key health issues for many groups in Greater Cambridge. Whilst there is a reflection that noise can to some extent be mitigated by traffic reductions and other measures in paragraph 3.68, there is no similar mitigation recognised for air pollution. Table 3.3 outlining the key sustainability issues for the Local Plan should strongly reflect the impacts of traffic on health and inequality outcomes in the SA objectives.

  - LUC response: Once a draft plan is prepared, the SA will include consideration of potential measures to mitigate any negative effects identified. Potential effects of traffic on health will be included in the equivalent table in the next iteration of SA.

- Employment

  Section 2 of the Scoping Report notes the high level policy requirements introduced by the Government for the part that the Oxford Cambridge Arc is to play in the prosperity of the region (that is briefly mentioned in paragraph 4.24). ‘Partnering for Prosperity’, the new deal for the Cambridge-Milton Keynes-Oxford Arc is briefly referenced at paragraph 4.9. These documents together

identify the high levels of employment growth that the Government expects across the Arc. The SA scoping should be clear that proposals that seek to deliver integrated employment growth at the higher levels expected from Government in relation to the Oxford Cambridge Arc will be favoured in the assessment. This criterion needs to be factored into SA objectives 14 or 15.

- LUC response: The SA considers a range of sustainability issues, not just economic and employment growth. These will be assessed through SA objectives 14 (economy) and 15 (employment). It is considered that the methodology, particularly the SA framework and assumptions for SA objective 14, already recognises that higher levels of employment growth would have a greater positive effect on this objective.

- Transport and Air Quality

  The national policy guidance listed generally contains policies that are aimed at reducing emissions from vehicles, or making emissions less noxious. These documents give very little prominence to the reduction of vehicle movements, in contrast to the reduction of vehicle emissions. The former aim is much better in all respects: reducing vehicle movements (and encouraging active travel) are both good for the environment and our health due to better air quality, but also improve health through activity.

  The Air Quality Action Plan identifies (on page 18) that modal shift from private car to public transport and active travel will impact positively on air quality. Table 2.3 of the Action Plan identifies monitoring targets relating to increases in bus patronage, cycling trips, journeys to school by means other than car, and traffic congestion. The ability to meet these measures should form a part of the SA objectives: i.e. policies and potential site allocations are rated as higher / better the more likely they are to achieve these modal shifts. This should be considered in answering the Appraisal questions under SA objective 13.

  Local Transport Plan 2 contains targets to restrict any increase of transport within Cambridge City centre. The ability of policies, and sites, to reduce or limit traffic congestion should be a measure of how sustainable they are, and included in the SA objectives. Table 5.1 notes that the existing policies in the adopted Local Plans that promote sustainable and active transport based on sufficient population densities. The ability of new development to support public transport and active travel should be a key part of the Sustainability Appraisal assessment.

  - LUC response: The SA has sought to list the key relevant policies. Many of these refer to modal shift or refer to emissions targets, but do not set out specifics on how these are to be achieved.

SA objective 13 already includes the questions 'Does the plan promote more sustainable transport and reduce the need to travel?' and 'Does the Plan contain measures which will help to reduce congestion?'.

- Climate Change Adaption and Mitigation

  Page 97 and Table 7.1 of the Scoping Report identify that transport makes the largest contribution to carbon emissions (over 34%) in South Cambridgeshire. Whilst it is correct that the peat fens create significant mitigation, the reduction of vehicular traffic and emissions from traffic is likely to have significant impacts on climate change adaption. This lends weight to the criteria that include the ability to reduce vehicular traffic as key assessment elements for the Sustainability Appraisal.

  - LUC response: Noted. Vehicular traffic and its contribution to carbon emissions and air pollution is considered through SA objectives 12 and 13 of the SA framework.

- SA Framework

  Table 11 sets to the SA Framework for the Greater Cambridge Local Plan. Paragraph 1.5 of the Scoping Report seeks views on any additional SA criteria that should be included. MGH comments below on each of the SA objectives, and additional objectives that should be included to ensure a robust assessment. Commentary is also provided on the appraisal questions associated with each objective.

- SA 1: Housing

  The Scoping Report identifies (as set out in the sections above) a larger number of policy documents, from government to local level, that indicate housing is needed to support economic development; and that high levels of economic development are required. The SA objectives (including SA objectives 14 and 15) do not include this link between housing and employment. There are two alternatives: an objective is added, or an existing objective is amended to include an objective: To deliver sufficient housing to support employment growth, locating new jobs near to new homes, and balancing jobs with homes. The Appraisal questions should include: Does the Plan support increased employment delivery with sufficient homes to support employment growth? Have homes been provided where they are accessibility to jobs, particularly by public transport, is maximised?

  - LUC response: There are links between many of the SA objectives, thus for the purposes of assessment, these are necessarily somewhat siloed. The quantum of housing to be included in the plan will be subject to SA (along

with any reasonable alternatives) and this assessment will take into account the relationship between housing and economic growth through assessment against SA objectives 14 and 15. SA objective 15 includes a question on whether employment opportunities are easily accessible, particularly via sustainable transport.

- SA 4: Public health

  Appraisal question 4.2 touches on the issue of transport choices, but neglects any specific reference to public transport. Studies show that increased public transport has clear benefits to activity patterns, in addition the removal of harmful emissions from vehicles, the increase in equality provided by public transport, and the benefits to mental health (and productivity) in reducing commuting times. This is set out in the Scoping Report, see inter alia paragraphs 3.14 to 3.16 above. A separate Appraisal Question should be added: Does the Plan promote increased levels of public transport use, and better public transport density?

  - LUC response: As above, there are links between many of the SA objectives, thus for the purposes of assessment, these are necessarily somewhat siloed. Consideration of air quality, via SA objective 13 (air pollution) is included because this is a determinant of human and environmental health. Equalities are considered via SA objective 3 (equalities) (although it is noted walking and cycling provide more for equalities and health due to the lower/lack of costs and emissions). Access to public transport is assessed via SA objective 12 (climate change mitigation).

- SA 12: Minimising climate change

  SA 12.4 relates to public transport provision, but simply asks whether the Plan supports access to public transport. As set out above, public transport is a key element relevant to multiple factors affecting sustainability. SA 12.4 should therefore be strengthened to read: Does the Plan support the growth of public transport networks, modal shift away from private cars and onto public transport, and access to public transport options?

  - LUC response: Noted. This appraisal question will be updated.

- SA 14: Facilitating the economy

  The Appraisal questions included do not reflect the importance of economic growth that is highlighted in the Scoping Report itself, and referenced above in paragraph 3.13. SA14.1 asks whether the Plan provides for an adequate supply of land to meet Greater Cambridge's economic and employment needs.

SA 14.5 asks whether the Plan supports stronger links to the wider economy of the Oxford Cambridge Arc. The Scoping Report indicates a much greater requirement. Greater Cambridge is within the Arc, and new infrastructure, including East West Rail has already been announced on the basis of higher levels of economic growth. Government expects Greater Cambridge to deliver higher levels of employment to support additional growth within the Oxford Cambridge Arc; and the economic reports accompanying the evidence base produced to date (in addition to other independent research) show that substantial growth can be achieved in the area.

SA14.1 should therefore be amended to read: Does the Plan provide for a supply of land and the delivery of infrastructure that will meet the enhanced level of growth envisaged across the Oxford Cambridge Arc?

SA 14.5 is therefore no longer needed, but could be used as a separate question to relate the SA and provision of employment to infrastructure. SA 14.5 should therefore be amended to: Does the Plan provide adequate infrastructure in the right places to support enhanced levels of economic growth?

- LUC response: The SA deliberately has separate objectives relating to Greater Cambridge's economic and employment needs and those related to the Oxford-Cambridge Arc. SA 14.5 will be reworded to reflect the need to contribute to sustainable economic growth envisaged across the Arc.

- Appendix 1

  Assumptions regarding distances

  The assumptions regarding distances are broadly appropriate, assuming that they are applied equally to all sites. It would be helpful to also assess sites in relation to their accessibility by bicycle, journeys which are increasing, particularly with the rise in use of micro-transport*** including e-bikes and scooters.

  - LUC response: Walking-based distances are considered appropriately precautionary, given that not everyone may have access to or be able to use a bicycle or other micro-mobility. Access to cycle routes is assessed via SA objective 12 (climate change mitigation).

- SA objective 1

  MGH propose that this objective should include a requirement To deliver sufficient housing to support employment growth, locating new jobs near to new homes, and balancing jobs with homes. The criteria for the assessment of this objective should not be based simply on housing need, or the proposed small

10% increase in housing need, but should instead be predicated on meeting the housing need for employment aspirations. Without such a requirement the Plan cannot provide sufficient housing for everyone to live in a decent home, whilst also meeting the Governments aspirations for economic growth. The criteria should therefore be: sites that fail to provide sufficient land for total housing need to support the highest economic forecasts will have negative effects (-). Sites that deliver sufficient land to support the full economic projections for the area will have significant positive effects (++).

- LUC response: See above re: assessment of housing quanta.

- SA objective 3

  The criteria and assumptions in the Scoping Report suggest that public transport implications are considered elsewhere and therefore do not need to be considered in relation to social inclusion and the equality act. This approach is incorrect. Public transport is a vital element of many of the sustainability objectives, and should therefore be considered in relation to each objective, ensuring that the weight given to support for public transport (and modal shift away from private car usage) is equal to its importance.

  MGH propose that two criteria are added to the assessment assumptions. 1. If a site is within walking distance of regular public transport (1 journey every 15 minutes at peak hours) it will have a neutral effect. If a site is within walking distance of two or more bus routes with regular public transport, it will have a positive (+) effect. If a site is within walking or cycling distance of strategic transport, such as rail, guided bus, park and ride or proposed Cambridge Autonomous Metro, it will have a significant positive effect. 2. If a site is able to support additional public transport provision it will have a minor or significant positive effect, depending on the quality and quantum of public transport improvements that can be supported.

  - LUC response: As stated above, there are links between many of the SA objectives, thus for the purposes of assessment, these are necessarily somewhat siloed. Repetition of the accessibility to transport criteria would make it harder to distinguish between sites. Nevertheless, the impacts of access to public transport on equalities will be considered in policy assessments and the assessment of cumulative effects.

- SA objective 4

  This objective includes a criteria that relates to the beneficial proximity of development to healthcare facilities. A further criterion should be added to include that: Sites that are able to deliver new healthcare facilities within walking distance of employees or residents, will have a significant positive effect.

- LUC response: It is considered appropriately precautionary for the SA to not make assumptions about the infrastructure to be delivered onsite, as this is uncertain. Being 'able to deliver' new healthcare is considered difficult to define and does not guarantee this will come forward.

- SA objective 5

  MGH disagrees that sites within 400m of locally designated sites will have an uncertain negative effect.

  This will depend on the site's size and ability to offer mitigation, or its ability to offer biodiversity gains in relation to the designated site. The assumption should therefore be amended so that the uncertain negative effects apply only to sites where development is proposed within 400m of locally designated sites.

  - LUC response: The SA is prepared on a precautionary basis and therefore does not make any assumptions as to mitigation measures to be provided by development.

Respondent 50054 (member of the public)

- While the Scoping Report notes (1.15 "Baseline Information") that "It is a requirement of the Strategic Environmental Assessment process that consideration should be given to the current state of the environment", there is little recognition of current environmental capacity issues (apart from "over-abstraction of water in this region is a key issue") and constraints, and no evaluation of successes or failures of the current Local Plans. Cambridge's historic environment is also threatened by Climate Change challenges (including mitigation and adaptation) and Government targets for meeting them. These are also high risk factors for Cambridge's historic environment, with difficult choices to be made. A baseline assessment of the implications for Greater Cambridge of current Government retrofit targets is urgently needed. These issues should be identified and prioritised in both baseline information and the key Themes.

  - LUC response: The SA has sought to establish the environmental, social and economic baseline based on data that is publicly available and available from the Councils. It seeks to identify potential significant effects of the plan and options feeding into this. It is acknowledged that many of the topic areas overlap, but are necessarily somewhat siloed in the SA objectives to allow ease of interpretation and comparison between options. Future iterations of the SA will more clearly state that this is the case.

Historic England

- We welcome the changes made in the Sustainability Appraisal scoping report in response to our previous consultation comments.
  - LUC response: Noted.

Martin Grant Homes Ltd & Harcourt Developments Ltd (Savills)

- The MHCLG document of March 2019 titled 'Oxford-Cambridge Arc'* is a joint declaration of ambition entered into by the Government and local partners envisages substantial growth in the Arc. It establishes a target of building up to 1 million homes by 2050. These homes are necessary to deliver the Governments industrial strategy, which envisages increased productivity in order to boost economic growth and prosperity, and to deliver higher incomes (p14, ibid). To date, no local authority within the Arc has provided for any additional growth in their local plans above the standard housing requirement that would assist in reaching this target. The Greater Cambridge Plan should recognise and accommodate part of this wider growth. If it does not do so, it will set a precedent for other local authorities within the Arc (such as the highly productive city of Milton Keynes) to lower their ambitions, and the Government's strategy for increased growth will fail.
  - LUC response: This document is discussed in the SA Scoping Report, particularly from paragraph 2.22. This comment is largely for the attention of the Councils as plan-makers.

The National Trust

- The Trust welcomes the inclusion of biodiversity, landscape, and the historic environment as key issues for the SA, and recognition of the historic landscape setting of Cambridge is especially welcome. The challenge this presents for new development is referenced at page 15 of the Scoping Report and we comment further on this issue in our responses to the main consultation document. We note that the Sustainability Appraisal scoping report identifies over abstraction, also referenced in HRA scoping report, as a key issue. We share this concern, particularly in relation to the potential impacts on Wicken Fen as stated above.
  - LUC response: Noted.
- We support the intention to plan for new green spaces through the Local Plan review process, referenced at page 6 of the Scoping Report. This provides an opportunity to raise the scale of green space ambition for the Cambridge area,

and should allow for the consideration of cross boundary opportunities, as identified in the Issues and Options consultation document. The SA should include recognition of the relationship of the Plan to the Wicken Vision Area, which is located in East Cambridgeshire but adjacent to the planned new town at Waterbeach, and to the South Cambridgeshire boundary.

- LUC response: Noted. Reference to the Wicken Vision Area is included in paragraph 8.34 of the Scoping Report.

Bidwells

- Paragraphs 2.5 and 2.6 of the SA Scoping Report provide a summary of the major development sites currently allocated in adopted local plans. Specific house numbers for these sites are provided which in some cases are different from the allocation. This should be corrected. To evidence robust delivery numbers, either allocation numbers should be used, or where planning has been consented, then revised numbers would be appropriate. Clarity on what numbers will be used should be provided. In particular, the bullet point on “Land between Huntingdon Road and Histon Road” states that the dwelling numbers have been revised during pre-application discussions and a housing number is provided which differs from the allocation. As the design is ongoing for this project and indeed no planning application has yet been submitted, it is not appropriate to use a revised number which has no status. The discussion of major projects also needs to include major developments with resolution to grant outside of the local plan system, such as the Wellcome Genome Campus Application (S/4329/18/OL).
  - LUC response: Information about the source of housing numbers will be included where similar information is provided in future iterations of the SA.

    The Wellcome Genome Campus will be included in future discussions of major projects. LUC will seek advice from the Councils on any other appropriate projects to include.
- There is limited linking of the baseline information provided in the Scoping Report to the health and equalities impact assessments. The equalities aspects, in particular, are not explicitly discussed in the baseline information, but are included in the SA Framework. The report, for example, does not identify any existing problems relevant to the equalities assessment. No table similar to 11.2 is provided for equalities, which would set out how equalities considerations relate to the topics considered and the SA objectives.
  - LUC response: The SA is reliant on existing data. A separate Equalities Impact Assessment is now being undertaken, which will include more detail

and the SA will draw on with regards to the equalities objective. A table similar to 11.2 was not considered appropriate, as different objectives do not relate to different protected characteristics. However, text will be added to further explain the relationship between equalities and the other SA objectives.

- A separate assessment method is proposed for equalities (positive/negative/neutral) on page 147 of the Scoping Report. It is not clear how this will relate to the SA methodology, which also identified some equality criteria within the SA objectives (SA objective 3). Are two assessment methods proposed? If so, how will outcomes from two assessments be taken into account in the local plan? Separate Equalities Impact Assessment reporting forms for each council are provided in addition to the SA and the Scoping Report. Having three documents address these issues could be confusing, particularly for vulnerable groups, leading to a "paper chase". A means of integrating these documents, or providing clear signposting between them, should be considered.
  - LUC response: A separate Equalities Impact Assessment is now being undertaken, which will include more detail and the SA will draw on with regards to the equalities objective.
- While detailed criteria and assumptions are proposed for site options (Table A1.1), similar detail on criteria and assumptions for other aspects of alternatives should be provided. This should be linked to the SA Framework, which currently has some assumptions and terminology which could be refined for improved rigour and transparency.
  - LUC response: Detailed criteria and assumptions are only included for site options, as site options can be informed by quantifiable, spatial data. The assessment of other alternatives will draw on these if they include a spatial element and all assessments will utilise the SA framework.
- Where the concepts of "minimise" or "maximise" are used in the SA Framework they should be defined in more detail; otherwise there is a degree of interpretation.
  - LUC response: It is not considered appropriate to define these terms quantitatively. They indicate a direction of travel and will vary depending on the policy or site being assessed.
- SA 1.3. How will "affordable homes" be defined and measured? Are these to buy or to rent? Will social housing be considered? How will student housing be considered?

- LUC response: Affordable homes will be defined as per the NPPF definition and include any type and tenure of housing for those whose needs are not met by the market. The SA would expect the Local Plan to clearly set out the affordable housing need, without the need for the SA to interpret this.

- SA 1.4. It is assumed that “young” and old” are specified as they have been identified as a key sustainability issue. It would be useful to clarify that “young” refers to student accommodation, not children. If young does refer to students, is it duplicated in SA 1.5? Should SA 1.5 refer to “protected characteristics” under the Equalities Act?

  - LUC response: 'Young' does not refer to children, who would be considered under family housing needs, or specialist housing if in residential care. It does not relate just to students (who are not necessarily all young) but other younger adults, such as young professionals. This will be clarified in the next iteration of SA. SA 1.5 does not refer to protected characteristics, so as not to duplicate SA 3.

- SA 2:

  - SA 2.1. How will “supporting” these centres be determined?

  - SA 2.3. How will “accessible for all” be determined?

- SA 3:

  − 3.1. Does integration in this case mean geographical proximity? If not, how will this be determined?

  − 3.2. How will benefit and use be determined?

  − 3.3. How will “meeting the needs” of groups be determined? What type of needs: housing needs, social Infrastructure needs?

  − 3.4. What type of social and cultural initiatives are likely to be in the local plan?

  − 3.5 Define “high level” of outdoor interaction. Should “where people mix” be changed to “accessible to all”?

  − 3.6 How will removing or reducing disadvantages be measured or determined? What disadvantages have been noted to be an issue in the baseline information, could these be specifically targeted?

  - LUC response: The purpose of these questions is to give an overview of the factors considered when assessing options against each SA objective. Any quantification will likely depend on the option being assessed and it is

considered inappropriate to restrict what is being assessed through strict quantification - the assessment will instead be carried out against the baseline and the likely evolution of this without the plan. The SA will use evidence, where available, and professional judgement to consider whether an option or policy contributes towards achieving an objective or not.

Appendix 1 of the Scoping Report sets out how these will be determined with regards to site assessments. Other assessments will draw on these as appropriate.

With regards to 3.1, integration refers to integration of communities. 'Neighbourhoods' will be updated to 'communities' for clarity.

With regards to 3.4, no assumptions have been made about what the Local Plan may include.

With regards to 3.6, this question has been deliberately left open to allow the broadest assessment possible. As explained above, the SA will draw on the separate EqIA.

- SA 8:

  − 8.2 Can the plan ensure contaminated land is remediated - is this a more appropriate consideration at the project level?

  - LUC response: There is no reason the plan could not promote remediation of contaminated land and therefore this is considered an appropriate consideration at plan level.

- SA 11:

  − 11.4 It would be useful to provide a definition for retrofitting green infrastructure, with mind to how this could be delivered by the plan? Are there particular green infrastructure resources which are in poor condition and could benefit from retrofitting?

  - LUC response: A separate Green Infrastructure Study is being prepared, which will inform GI proposals in the Local Plan.

    It is considered that 'retrofitting green infrastructure' is self-explanatory.

- SA 14

  − 14.1. What type of infrastructure will be considered? Transport? Water? Social?

  − 14.3. How will providing for start-up businesses and flexible working practices be measured?

− 14.5. Reference should also be included to the other growth corridors which Cambridge is involved in: Cambridge to Norwich Tech Corridor and Stanstead Growth Corridor.

- LUC response: 14.1 - This applies to any relevant infrastructure.

  14.3 - This will be assessed on the basis of whether the plan specifically provides for this or if policies could support this, such as by providing low rent workspace.

  14.5 - Other growth corridors will be included in future iterations of the SA

- SA 15

  − 15.2 - Supporting equality of opportunity for all is a legal requirement; this appraisal question could be refined to target specific points of concern vulnerable groups. Definitions of groups and how “support” will be measured would be useful.

  - LUC response: As explained above, the SA will draw on the separate EqIA to determine how the Local Plan will address equality issues.

Nathaniel Lichfield & Partners (Agent) [8776]

- The SA objectives identified (SA Scoping Report Section 11) do not appear to be weighted in any way, meaning in effect the SA makes no distinction as to whether one SA objective may be more or less important than another in informing which option should be taken forward; all objectives are treated equal in the analysis. Where there are competing aims between objectives, or balances to be struck, it will be necessary for the Council to consider wider policy aims and objectives and the relative importance of these.

  - LUC response: The SA has deliberately not chosen to weight any objectives in order to give a clear and fair appraisal. This is the approach LUC has taken for multiple SAs for Local Plans that have been sound at examination.

- Linked to the above, not all objectives have a spatial dimension to them. For example, some objectives around aspects design might be equally implemented on any site or option; in such instances the location is less important. The site appraisal and selection process should focus on those reasonable alternative spatial options where location is a differentiating factor (which the appraisal of options within the SA does to a degree, noting the “difficulties” set out para 2.19-2.22).

  - LUC response: The SA will assess all reasonable alternatives identified by the Councils against all SA objectives, regardless of whether or not they have a spatial dimension.

- The SA site appraisal criteria (SA Scoping Report Appendix 1) provides a reasonable coverage of objectives and themes for assessing sites. However, we are concerned with how the criteria will be applied where sites and proposals will bring forward new infrastructure or uses, which could address deficiencies the locality. The current approach under some criteria of using distances to existing facilities, may negate the opportunity to assess whether sites could enhance wider access to such facilities by bringing forward new centres or local community facilities. It might also prejudice larger scale development that can achieve critical mass to viably deliver infrastructure (i.e. NPPF para 72). For example, the criteria under SA objective 4 indicates if a development is likely to incorporate new health or open space facilities, then it will be assessed as though those would come forward, but similarly under SA objective 2 the criteria appears to apply only to distance to existing city/town/rural centres rather and primary/secondary schools, rather than taking account of whether development could bring forward new provision of such facilities. It is imperative any implementation of the site criteria can adequately respond to the opportunity to deliver sustainable development through change, not just against baseline conditions.

  - LUC response: LUC will mirror infrastructure assumptions made in the HELAA. These will be incorporated into the site appraisal criteria and applied consistently to any site appraisals.

SA Report for Issues and Options (December 2019)

Martin Grant Homes (MGH)

- SA objective 6

  The impact of development at North Cambourne is difficult to categorise in relation to this objective, as it is not specifically related to a new settlement, and therefore does not have the potential negative impacts that relate to development Option 4. MGH await the detailed SA of sites in order to comment more fully, but would welcome the opportunity to discuss potential impacts on the distinctiveness of Greater Cambridge's landscapes and townscapes in more detail. There is an opportunity at North Cambourne to add to the distinctiveness of Cambourne, building on the existing identity of the town and creating a strong sense of place.

- LUC response: Reasonable alternative sites will be assessed in line with the SA assumptions.

- SA objective 7

  MGH strongly disagrees that North Cambourne would be likely to have a detrimental effect on the qualities, fabric, setting and accessibility of Greater Cambridge's historic environment. There are very few heritage assets related to the site, and impacts on them through development would be limited. This issue can be explored in more detail during the SA of specific development sites.

  - LUC response: Reasonable alternative sites will be assessed in line with the SA assumptions.

- SA objective 11

  The SA concludes at paragraphs 3.86 and 3.87 that because development is likely to lead to a reduction in permeable surfaces flood risk will increase. This is not accurate. All development is required to deliver surface water drainage in a sustainable way, including measures that mitigate against climate change. In other words, new development will normally mitigate flood risk by providing storm water attenuation that slows water run-off to rates based on increased rainfall. This offers flood mitigation, contrary to the initial findings of the SA. This would be the approach adopted at North Cambourne, which lies outside of any designated flood zones. MGH therefore expects that the detailed SA for the site will conclude that it can provide benefits to flood risk minimisation, and adaptability to climate change.

  - LUC response: The SA has been carried out on a precautionary basis, therefore highlighting potential significant effects. In addition, these options have been assessed 'policy off', i.e. not making assumptions based on existing policy or making assumptions about detailed policy requirements of the emerging plan. Nevertheless the point is noted and we recommend the Councils include a policy requirement for development not to increase surface water runoff above greenfield rates.

- SA objective 12

  Assessment against this objective is particularly sensitive to the provision of public transport and the ability of development proposals to limit the impacts of vehicular traffic, as recognised in paragraph 3.92.

  Option 2 (the Cambridge Airport) is assessed as being of sufficient scale to be able to deliver a range of homes, jobs, services and facilities, which could reduce the need for people to travel elsewhere. MGH has carried out an

assessment of the potential increase in self-containment that could be achieved at Cambourne, together with a shift away from car usage and onto public transport. The evidence to support this approach is set out in Appendix 1, together with the assumptions made about what could realistically be achieved. Our evidence shows that there is potential to deliver a large number of homes at North Cambourne with a net zero (or minimal) effect on car journeys to Cambridge.

It is clear that, should new settlements (or expansions of existing settlements such as North Cambourne), also be located on public transport corridors, they will not necessarily have the balanced positive and negative effects of new settlements as shown in the table on p39. It is more likely that they would have the significant positive effects associated with development Option 6.

- LUC response: Reasonable alternative sites will be assessed in line with the SA assumptions. Please note that site-specific studies cannot be taken into account, as all reasonable alternatives must be considered on a level playing field, in the same level of detail.

- SA objective 13

  Objective 13, similar to Objective 12, is influenced strongly by patterns of commuting and car usage. The comments made above in relation to Objective 12 are also relevant to this objective, with likely positive effects from development at North Cambourne.

  - LUC response: See above re: SA objective 12.

- SA objectives 14 and 15

  The assessment of this objective would be similar for Cambridge Airport and North Cambourne; or for public transport corridors and North Cambourne. The North Cambourne proposals are of sufficient size suitable to create a strong and vibrant community, well-connected to Cambridge with public transport, which would be attractive to global and local employers. The provision of a mixed-use community at North Cambourne, including a variety of employment types, would be likely to generate significant positive effects to the economy.

  - LUC response: Reasonable alternative sites will be assessed in line with the SA assumptions.

- Conclusions

  MGH are mindful that this is a high level initial appraisal of options. It is clear that the MGH site, unlike Cambridge Airport, does not fit neatly into any one of the broad development options. However, it does benefit from the positive

effects of new settlements, and the positive effects of development on public transport corridors. MGH looks forward to the conclusions of the individual site sustainability appraisals, and would welcome the opportunity to engage with the Councils in this process.

- LUC response: Noted.

CPRE

- 1. CPRE finds the Sustainability Appraisal of Issues and Options (SAIO) to be comprehensive and clear. However, because of its terms of reference, it does not fully consider the regional and national sustainability issues created by development within Cambridge and South Cambridgeshire. CPRE believes that some of these issues are so significant that they should have been considered in greater depth.
  - LUC response: It is assumed that the following comments expand on this statement. Those comments are referred to in turn below.
- 2. The Cambridge Green Belt was the first Green Belt outside of London and it is the smallest. Green Belts were an invention of one of our county's foremost citizens, Octavia Hill. It is therefore of historic value in its own right and furthermore provides the unique setting for the City, its collegiate buildings and its academic character and inheritance. This significance has not been acknowledged in the SAIO.
  - LUC response: As noted in paragraph 10.17 of the SA Scoping Report, Green Belt is a policy designation, rather than a sustainability designation, which has its own defined purposes and is considered separately to the SA.
- 3. The SAIO accepts the same assumption of growth as the Issues and Options Report. However, growth in itself is not sustainable and CPRE believes this assumption should be questioned by the SAIO.
  - LUC response: The SA has regard to the scope of the Local Plan, which is to provide a framework for growth. No growth is not a reasonable alternative within the national policy context.
- 4. Furthermore, the SAIO has not considered the national or regional sustainability of undertaking further major developments around Cambridge. As we stated in our response to the Issues and Options report there has been no consideration as to how this major investment of national funds in the relatively well-off south-east will further reduce or limit investment in the North of the UK. This in turn will reduce the more sustainable options of re-using the near 1

million empty properties that exist in the North and Midlands and the documented space for another 1 million properties that exists on brownfield land in Northern and Midlands towns and cities.

- LUC response: As above, the SA has regard to the scope of the Local Plan, which is to provide a framework for planning within Greater Cambridge. Whilst cumulative effects will be considered, government investment in the area is outside the scope of SA.

- 5. The SAIO recognises the varying quantities of best and most versatile agricultural land that the different options could cause to be built on around Cambridge. However, it does not recognise that the county of Cambridgeshire hosts a nationally significant proportion of this country's best and most versatile farm land. As we have indicated previously, by the end of this century it is probable that climate change will have caused significant loss of the Fens which currently grow 24% of UK food supply. Therefore, it is imperative that the remaining best and most versatile land is not built on but preserved for food supply. This is a national sustainability issue and it should not be ignored.
  - LUC response: Noted. All site options have been considered in relation to their potential to affect higher value soils in the plan area through SA objective 8.
- 6. It is encouraging that the SAIO recognises the issues of water resources and quality as major issues. There is already damage to the chalk streams caused by over-abstraction and the River Cam shows high stress levels in the summer months. We agree with paragraph 3.79 but we are concerned that the local authorities, driven by the NPPF, may not be taking these issues as seriously as they should and instead may be relying on the statutory duties of the water companies to dig them out of a hole. Waste water treatment capacity must be given a higher priority. The North Cambridge development requires the existing treatment plant to be moved but there is no clear decision about that yet and, if further treatment capacity is need, where will that be sited and how will it be protected from flooding?
  - LUC response: This comment is largely for the Councils as decision makers, rather than the SA. The reasons for the Councils' decision making in relation to the selection of site options is set out in Appendix E of this report.
- 7. The SAIO does not address the issue of flood risk within the context of climate change or in the context of the wider region. Existing flood zones in many parts of Greater Cambridgeshire will experience higher risk of flooding in future because of sea level rise caused by climate change (Predictions range between 1.1 – 4.7 metres by 2100). In December 2019, the Environment

Agency issued a flood warning for Cottenham Lode which extends up to and under the A14 north Cambridge by-pass. Such warnings will without doubt become more frequent. Furthermore, additional run-off from more development around Cambridge will increase flood risk to communities further north such as Waterbeach, Cottenham, Stretham, Ely and Littleport. There is no detailed indication as to how this runoff will be prevented.

- LUC response: SA objective 11 addresses flood risk and climate change, therefore recognising the link between the two. The SA Scoping Report discusses this in Chapter 7 and notes that an updated SFRA is being commissioned to inform the Local Plan.

  The SA will consider potential mitigation measures for any negative effects identified once draft plan policies have been drafted.

- 8. We find that the SAIO takes a relatively superficial approach to addressing prevention of Climate Change and its mitigation. It is clearly restricted by taking its lead from the Issues and Options. As we have stated in our response to the Issues and Options, Climate Change is the most pressing issue of our time. The current proposals are predicated upon 'growth' and growth has to be halted in a controlled manner without unacceptable effects on the poorer and more vulnerable people in our society. We agree with most of what is said in paragraphs 3.92 to 3.97 when addressing SA objective 12. However, the Objective is too little, too late. The whole concept of the Cambridge-Oxford Arc must be reviewed and much of it halted and replaced with more sustainable changes in the location of housing and business and the discouragement of commuting and business travel.

  - LUC response: The SA assesses the Local Plan and reasonable alternatives against the likely future baseline without the plan. The likely future baseline includes continued growth and the role of the Local Plan is to influence the scale, location and nature of this growth. As discussed above, no growth is not a reasonable alternative to the Local Plan.

  The Spatial Framework for the Cambridge-Oxford Arc is important context to the Local Plan, as it seeks to promote sustainable development across the Arc through a regional approach. This is a government-led ambition, for which comments should be directed to central government consultations. Planning for sustainable growth in the Oxford-Cambridge Arc: an introduction to the spatial framework (February 2021) states that the Spatial Framework will be subject to sustainability appraisal. (https://www.gov.uk/government/publications/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-spatial-framework/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-an-introduction-to-the-spatial-framework#how-we-will-develop-the-spatial-framework).

- 9. We agree with most of paragraphs 3.98 – 3.103 but we would reiterate that if housing development is undertaken in villages and other rural communities it should be accompanied where possible by employment space, to encourage local employment and reduce commuting. We also see high speed broadband as a means of facilitating distributed employment. Both will improve the sustainability of rural communities.
    - LUC response: Noted. This point is also for the consideration of the Councils as decision-makers.
- 10. We do not agree with the principles behind SA objective 13 and hence much of the content of paragraphs 3.104 – 3.109. Society must recognise there is no such thing as "sustainable development". All development has varying degrees of unsustainability. We accept that Options 1 and 2 are less unsustainable than the other Options. Nevertheless we are concerned by the loss of skilled engineering employment close to Cambridge that the development of Cambridge Airport, Option 2, would engender. We are also concerned that moving the Marshall's business to another location will just create sustainability issues elsewhere, not the least being the building of new facilities and the travel of existing employees.
    - LUC response: Loss of employment at Cambridge Airport is recognised in paragraph 3.105, although it is noted this may also impact related jobs not directly on the airport site. Relocation of Marshall's business elsewhere is outside the scope of the local plan, if relocated outside of the plan area. The SA will assess impacts of all reasonable alternative employment site options.
- 11. We are disappointed with the discussion of SA objective 14, paragraphs 3.110 – 3.119. Unfortunately, this is driven by the manner in which the Options have been set out so separately whereas, in reality, the likely outcome of the Plan will necessarily be a combination of these options. There are many communities across the County which are increasingly becoming commuter dormitories. Larger communities, such as Cambourne/Bourne, Northstowe, Bar Hill, Ely, Alconbury Weald and Manea are capable of supporting significant local employment space. Many larger villages could easily support more small employment units of the type that start-ups and rural businesses require. A survey in 2010 showed that some 70% of Ely's working population on its new estates commuted to Cambridge or London. Other communities will have higher proportions of commuters. This is not a sustainable situation. Our conclusion is that the Greater Cambridge Local Plan must consider the economic and residential impact on its wider hinterland as well as within Greater Cambridge itself.

- LUC response: Paragraph 3.29 of the Issues and Options SA acknowledges that more than one of these options could be taken forward, but it has not yet decided how any such combination would look. Due to this, and in order to aid the Council's decision-making, the SA considered each option on its own merits. In-combination effects will be assessed in future iterations of the SA, once policies have been drafted.

- 12. We are concerned that better integration of public transport does not seem to be considered as a major sustainability issue.
  - LUC response: The evidence reviewed highlighted accessibility to and capacity of public transport as the key issues. It is noted that integration of public transport is also important.
- 13. We are concerned that adequate electricity supply does not seem to have been considered as a major sustainability issue.
  - LUC response: The review of baseline data did not highlight limitations to electricity supply in the area and we are not aware of any data that shows this is the case. The SA assessments assume that proposed growth options and sites can be adequately served by energy suppliers, as they would not otherwise be considered reasonable alternatives.
- 14. We are concerned that no mention has been made of impact on the proposed Fenland Biosphere with its potential UNESCO designation. This is a major sustainability issue.
  - LUC response: The SA baseline will be updated to acknowledge the Great Fen landscape and the ambition to have this area recognised as a UNESCO Biosphere, which will recognise the cultural and biological importance of the area and identify this as a learning resource.

Natural England

- Natural England provided comments on the Councils' Sustainability Appraisal (SA) Scoping Report in our letter dated 11 October 2019.

  We are satisfied that the SA of Issues and Options report prepared by LUC (December 2019) has been prepared in a proper, logical and comprehensive manner and seeks to integrate the requirements of the Strategic Environmental Assessment (SEA) Directive, into the SA process. The approach to SA, as set out in the Scoping Report, including sustainability objectives, assessment methodology, consideration of relevant plans, policies and programmes and the SA framework appears to generally accord with the requirements of the

Planning and Compulsory Purchase Act 2004. The report proposes to address relevant SA themes and topics relating to the natural environment including biodiversity and geodiversity, agriculture, open space provision, transport, air quality, water resources and resilience to climate change and flood risk.

We welcome that the findings and recommendations of the HRA will inform the relevant aspects of the SA.

Natural England is unable to provide any detailed comments on the preliminary findings of the SA. We will be pleased to provide further comment as the detailed SA emerges, through preparation of the Local Plan and evidence documents including the Councils' Green Infrastructure & Biodiversity and Integrated Water Study evidence documents. The evidence should be used to guide the most sustainable locations for development, prioritising avoidance of impacts to the natural environment including recreational pressure, air quality and water. We would also expect this to identify opportunities for development to implement significant enhancements to the ecological network. The delivery of enhancements should be secured through the relevant allocation and biodiversity policies.

- LUC response: Noted.

  The comment regarding guiding development to the most sustainable locations and opportunities for enhancing the ecological network are largely for the attention of the Councils, as decision-makers. The comments have been considered as part of the drafting of policies for the plan.

- We agree with the key cross-boundary issues identified including wildlife and green infrastructure, transport and water including supply, quality, waste water and flood risk. The Local Plan will need to take a strategic approach to these issues to ensure that the proposed scale of development is sustainable and will not adversely impact the natural environment.

  - LUC response: Noted.

- The effects of recreational pressure will need to be fully assessed through the HRA and Sustainability Appraisal (SA). Mitigation to address any adverse impacts will need to be identified. Consideration should be given to the findings and recommendations of the recent Footprint Ecology Visitor Survey* commissioned by the National Trust which predicts significant increases in recreational pressure to Wicken Fen Site of Special Scientific Interest (SSSI) and Ramsar site, part of the Fenland Special Area of Conservation (SAC) and the Vision Area associated with nearby development such as Waterbeach New Town. The findings also indicate risks to other nearby sites such as the adjoining Cam Washes SSSI; this nationally important site is already at risk

from recreational pressure and disturbance to the notified bird interest by people and dogs.

*Saunders P., Lake S., Lily D., Panter C., (2019) Visitor Survey of the National Trust's Wicken Fen 100 Year Vision Area. Unpublished Report by Footprint Ecology.

- LUC response: Noted. The SA will take the findings of the HRA into account, particularly with regards to SA objective 5.

- With regard to air quality and health, the Plan should strive to develop a strategy and related policies that enable more sustainable travel and reduced reliance / use of private cars. Greater Cambridge requires a significantly enhanced sustainable transport network including enhanced and safer walking and cycling networks and better, cheaper and more frequent public transport. In addition to cleaner air and better health this will benefit wildlife and climate change.

  - LUC response: Noted.

- The adopted Local Plans allocate land for 33,500 homes to 2031. However, current calculations using the Government's standard method indicates a need for 1,800 homes per year, or 40,900 homes for the Plan period 2017 – 2040. This represents significant growth and associated development pressure across Greater Cambridge. In light of the Councils' ambitious targets for zero net carbon, more efficient water use and 'doubling nature' our major concern is whether the proposed level of growth, and the additional infrastructure needed to support it, will be truly sustainable i.e. capable of having no adverse environmental impact and contributing towards the 100% BNG target. Also to ensure legal compliance it will be necessary to ensure assessment of the maximum number of houses through the SA and HRA, rather than a minimal figure.

  - LUC response: The SA will consider all reasonable alternative housing quanta options identified by the Council.

- The Local Plan development strategy should be underpinned by up-to-date environmental evidence such as the mapping of ecological networks and enhancement opportunity areas currently being undertaken by the Councils for the green infrastructure and biodiversity evidence base. The assessment of existing and potential components of local ecological networks should inform the SA: application of the mitigation hierarchy will ensure development avoids adverse impact to the natural environment; development is instead focused on land of least environment value; and opportunity enhancement areas are linked for delivery through those developments.

- LUC response: The SA baseline will be updated at each stage of assessment to ensure it is up to date. SA objective 5 includes consideration of ecological networks, including the opportunity areas identified through biodiversity opportunity mapping.

- Natural England suggests that cross-cutting issues should be identified at this early stage. For example, transport infrastructure, water and sewerage, air quality, flood protection and recreation and leisure requirements can have potential implications for the natural environment and policies to deliver these requirements will need to ensure its protection and enhancement. Key issues for Greater Cambridge's natural environment include pressure on water resources, flood management, recreational pressure & deficits in accessible GI, air quality and climate change. The effects of large scale housing development on the existing green infrastructure network, through recreational pressure and disturbance, is a significant issue. Avoiding impacts by locating development away from more sensitive designated sites and habitat is critical. However, the scale of proposed growth requires additional measures to mitigate residual impacts; buffering and extending these sensitive areas to enhance their resilience to access pressure and creation of new alternative areas of accessible greenspace capable of meeting people's needs and diverting pressure away from more sensitive areas.

  - LUC response: Noted.

North Barton Road Landowners Group (North BRLOG) (Carter Jonas)

- The representations are focussed on the SA of the spatial distribution options at Paragraphs 3.38 to 3.119 and associated tables including Table 3.1.

  It is acknowledged in the SA the preferred spatial distribution strategy may be based on a combination of these options, but the assessment is based on each option individually. It is considered that some of the commentary on each of the spatial distribution options and likely effects is not correct, and it is requested that a more detailed analysis of the options is required in the SA for the Draft Greater Cambridge Local Plan.

  The North Barton Road Landowners Group (North BRLOG) is promoting land at South West Cambridge which is located within the Green Belt; the site would fall within Option 3: Edge of Cambridge – Green Belt. The findings of technical work undertaken to support the promoted site at South West Cambridge will be referred to in these representations where relevant.

The following representations are focussed on the SA of the spatial distribution options at Paragraphs 3.38 to 3.119 and associated tables including Table 3.1.

- LUC response: Noted. Reasonable alternative sites will be assessed in line with the SA assumptions at a later stage in the SA process.

- It is acknowledged in the SA that the scale of development, its design, and associated impacts will depend on the circumstances present at individual sites. It is considered that strategic sites will need to include appropriate services and facilities to meet local needs and capacity, and will need to be well-designed and include mitigation measures and enhancements to address impacts, but there is no reason why these matters cannot be satisfactorily addressed. For example, a Vision Document has been prepared for the promoted development at South West Cambridge, which has been designed to take into account landscape, heritage and ecological impacts. Mitigation measures are included to address any adverse impacts. Ecological and flood risk/drainage enhancements are provided, and the proposal includes a local centre and primary school and open space and recreation areas.

  Therefore, the promoted development at South West Cambridge is capable of delivering positive outcomes when assessed against the sustainability objectives.

  - LUC response: In order to consider all options on a level playing field and in the same level of detail, the SA does not take into account any proposed or potential mitigation measures.

- SA objective 1: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home

  It is not certain when Option 2 (Edge of Cambridge – Outside the Green Belt, which relates to development at Cambridge East) will be available for development because the existing uses need be relocated, and it is also not certain whether development at the site will provide policy compliant levels of affordable housing. The existing operations and businesses at Cambridge Airport will need to be relocated prior to the commencement of development. The Wing development at Cambridge East, for example, is required to provide 30% affordable housing against a policy requirement for 40%. It is requested that the assessment of Option 2 against the criteria for SA1 needs to take into account these factors.

  It is incorrect to assume that Option 3 (Edge of Cambridge – Green Belt) do not deliver policy compliant levels of affordable housing. The Greater Cambridge Housing Market Economics Analysis (prepared by Bidwells on behalf of North BRLOG) demonstrates that there is sufficient residual value in strategic

greenfield sites on the edge of Cambridge to support planning obligations and policy requirements including affordable housing. It is requested that the assessment of Option 3 against the criteria for SA1 needs to take into account the fact that such sites are capable of providing policy compliant levels of affordable housing.

It is agreed that Option 4 (Dispersal – new settlements) do take a long time to be delivered largely because such developments are complex, and it is noted that initial predictions about the lead-in timetable for the delivery of new settlements are often unrealistic. It is also relevant to SA1 that new settlements typically do not deliver policy compliant levels of affordable housing; the amount of affordable housing provided and proposed in the initial phases of Northstowe and Waterbeach are examples where this has occurred. It is requested that the assessment of Option 4 against the criteria for SA1 needs to take into account realistic assumptions about lead in times for new settlements which will affect the supply of housing and affordable housing, and the fact that such developments are not capable of providing policy compliant levels of affordable housing.

- LUC response: The point regarding the need to relocate existing uses from Option 2 is noted, although it is understood the airport itself would not be relocated.

  The current affordable housing policy requirement has not been taken into account as the new Local Plan will replace the existing Local Plan. The assessment states that Options 3 and 4 could result in a lower level of affordable housing; it does not state that affordable housing will not be delivered or have any reference to current policy requirements.

- SA objective 12: To minimise Greater Cambridge's contribution to climate change

  It is considered that the assessment of effects for Option 3 (Edge of Cambridge – Green Belt) includes negative commentary about the accessibility of edge of Cambridge sites by sustainable modes of transport, although it is acknowledged that these locations score well against this objective. The outcome of those effects will to a certain extent depend on the strategic sites selected.

  It should be noted for the SA for the Draft Greater Cambridge Local Plan that the area to the west of Cambridge is the focus for a number of proposed and potential transport infrastructure projects i.e. Cambourne to Cambridge Bus Corridor, Comberton Greenway, Barton Greenway, Madingley Road Cycle Improvements, and Cambridge Autonomous Metro. It is considered that the promoted site at South West Cambridge is well related to all of these proposed

and potential projects; the Cambourne to Cambridge Bus Corridor, Comberton Greenway, Barton Greenway are either within or immediately adjacent to the site.

- LUC response: Noted.

- Elevate low-emissions in new buildings above numbers of buildings and build cost. We must take a long-term view which minimises emissions as well as costs.

  This response supports Passivhaus standards for all new development and improvement to energy efficiency of existing housing stock.

  - LUC response: The SA assesses the contents of and options for the Local Plan. The Local Plan is not able to influence existing housing stock.

  Comments regarding support for Passivhaus in new development is for the attention of the Councils as plan-makers.

Environment Agency (Mr Tony Waddams, Planning Liaison Officer) [1273]

- We welcome mention of water, flood risk, green infra and biodiversity.

  We would like to be clear that with water resources in particular, Greater Cambridge is influenced beyond its immediate neighbours, and across the Anglian Water, Affinity Water and Cambridge (South Staffs) Water companies.

  The plan and SEA should take account of growth impacts based on the effectiveness of existing legislation, and not assume all flood risk will be mitigated. For example much urban creep and small infill plots carry out no surface water attenuation, and SUDs are often not fully maintained in the long term. This may impact downstream.

  - LUC response: Noted. The SA will assess all potential site allocations 'policy off' in the first instance, i.e. not assuming any mitigation will come forwards.

    It is outside the scope of the SA to analyse the effectiveness of existing legislation.

- Water resources

  The Environment Agency advises that water resources is a key issue, and current levels of abstraction (not just in Cambridge) are causing environmental effects.

The response highlights the Anglian River Basin Management Plan and highlights that limited resources and existing demand have limited the ability of waterbodies to meet 'good' status. There may be further deterioration as a result of increasing demand and/or reductions in available water supplies.

Cambridge Water company has recently (November 2019) published a new water resources management plan (WRMP), which sets out how the company will maintain customer supplies over the period 2020- 2045. The plan can be viewed here: https://www.cambridge-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-plan. The response suggests that the WRMP is based on a substantially different level of growth to that being planned for in Cambridge and the wider area (Cambridgeshire and Peterborough Combined Authority). The company's assessment (using its own modest longer term growth assumptions) is that it will have sufficient supplies to meet this growth, but the response highlights that this will require increased abstraction of already over-abstracted groundwater aquifers.

The underlying condition of the rivers and groundwater aquifers is set out in our Cam and Ely Ouse Abstraction Licensing Strategy https://www.gov.uk/government/publications/cams-the-cam-and-ely-ouse-abstraction-licencing-strategy This shows the stress that the hydrological system is presently under as a result of abstraction.

Given the pressures on local water resources and the potential risk of deterioration as a result of increased levels of abstraction, we advise that new development in the Cambridge area, and adjacent water resource zones aims for the highest levels of water efficiency. The council should also seek CWC's assurance that it can meet the needs of the SEA growth scenarios without causing water body deterioration, or excessive water transportation and associated impact on the areas in Anglian Water's or Affinity Water's zones that would be affected.

Water efficiency measures in new development are highly unlikely to achieve the kinds of reductions in demand needed to keep high levels of growth within sustainable levels. Investment in leakage reduction and demand management by existing communities and businesses will play a big part, as will seasonal abstraction and storage. New consumptive uses such as basements that need dewatering, water reliant agriculture, food processing and some manufacturing may individually and will cumulatively have a significant impact on water availability. Suitable protective policies will be needed to manage these impacts.

- LUC response: Noted. The SA baseline will be updated at each stage of assessment to ensure it is up to date, including updating information on WRMPs, if relevant.

Consideration of other water-demanding uses will be considered through the assessment of cumulative effects.

- The Greater Cambridge Local Plan, like any new development, which is inherently linked to population increase, risks a degradation of water quality [through both increased water demand and wastewater discharge].

  New development would undoubtedly put pressure on the river quality of the Greater Cambridge area and beyond. Any increase to wastewater discharge and water usage will need to be discussed with Anglian Water, whose role it is to accommodate the additional wastewater flows.

  Climate change could potentially exacerbate the impact of development on river quality. Dry weather reduces river flow and increases pollution concentration in the waterbody. Conversely, more intense rainfall episodes creates additional surface run-off from rural and urban areas, which increases the potential for water pollution. Additional rainwater in the sewerage network will likely lead to the treatment sites using overflow tanks, some of which may spill – as they are designed to do – into the rivers. These abovementioned events potentially contribute to a deterioration of water quality.

  - LUC response: Noted.

- EA recognises that water has carbon impacts across it cycle.

  Long distance transfer or desalinating water has significant impacts. Sustainable drainage that puts water into the ground retains a resource, and thus reduces the carbon impacts.

  Overworking and drying out of soils (and particular peat) has significant carbon impacts. Sustainable land use around agriculture is critical to manage this.

  Large scale restoration of wetlands and tree planting has positive impacts for biodiversity, water quality, flood risk as well and carbon sequestration. Requiring doubling of nature and making space for water would help achieve these objectives.

  - LUC response: Noted. These factors will be considered through the assessment of in-combination effects.

- The local plan should identify important and valuable ecological areas, such as designated wildlife sites, and those which can be augmented and connected... These areas should be part of a local nature recovery strategy (LNRS) and be connected to projects and partners who can help deliver the net gain.

The new plan could also acknowledge the significance of invasive non-native species (INNS) and their impacts on wildlife and the environment. INNS are considered one of the top five threats to the natural environment.

- LUC response: Noted. The threat from invasive non-native species will be recognised in the baseline of the SA.

Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [5828]

- When considering proposed development close to the boundaries of the Local Plan area, it is important to consider impacts on the areas beyond the planning boundaries. For example, in relation to heritage assets, the impact of development upon heritage assets and their settings across the Local Plan boundary should be considered.

  Regarding the North Uttlesford Garden Community you will now be aware of the Inspector's letter to the Uttlesford District Council dated 10th January which places the future of the NUGC into question.

  - LUC response: Noted. The SA will consider impacts beyond the Local Plan boundary, where possible. Note that for mapped datasets that are not publicly available, we generally only have access to data within the plan area. This is now recognised within the 'Difficulties Encountered'.

- There is an important synergy between the historic and natural environment. Landscape parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history.

  In Cambridge the Commons, green corridors, wedges and fingers as well as the green belt provide an important component of the landscape setting of the historic city of Cambridge. These features help to make Cambridge the special and unique place that it is today. They also serve to protect heritage assets and their settings. Cows grazing in the meadows close to the city centre, the iconic views of The Backs, the Commons and meadows all play a crucial role and form part of the character of this historic city. Maintaining and enhancing these features is critical to the future of this City.

  - LUC response: Noted.

- It is crucial that plans for the future development of Cambridge ensure that the city remains compact, and the setting of the city within a high quality landscape is retained by the Cambridge Green Belt. The iconic historic core, heritage assets and the river and structural green corridors (wedges and fingers) are intrinsic to the distinct quality of the City. The unique character, based on the individual settlement morphology, place within the landscape and individual heritage must also be maintained.
  - LUC response: Noted.
- Heritage Impact Assessment - In order to help refine which growth allocations to take forward, we would suggest that a Heritage Impact Assessment is undertaken of each of these sites.

  All potential sites will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or intervisibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.
  - LUC response: SA objective 7 relates specifically to the historic environment. Assessments against this objective will draw on the heritage impact assessment work.

Respondent 7209 (member of the public)

- The Consultation does not directly address water supply issues nor, for example, the associated issue of the flow of the River Cam and its tributaries. The latter issue is only directly relevant to the Consultation topic of Biodiversity and green spaces, for example, the loss of biodiversity if the River dries up.

  I agree with the Big Themes of the Plan but wish to stress that I am opposed to the scale of the proposed development. The supporting resource base is not there now nor, in my view, is it likely to be there in the near future. I understand that development should not be initiated until infrastructure has been built to support it. That infrastructure is not there now and will not be there in the near future.

Presently, supplying water to Cambridge is leading to over-abstraction of water from the chalk aquifer. In many years rainfall is insufficient in winter to recharge the aquifer to enable springs to flow, wetlands remain wet in summer and to support the flow of the River Cam and its tributaries in summer, as well as supply water to the homes and businesses of Cambridge. The Cam Valley Forum in its Manifesto on the River Cam (June 2019) and the report on the Water Crisis Forum by Cllr Katie Thornburrow (January 2020) have brought the topic to the fore.

Until infrastructure is put in place to supply water for the developments proposed in the Greater Cambridge Local Plan it is unwise to go ahead with the plan.

- LUC response: The Scoping Report recognises that Cambridge lies in a very dry region and water issues are assessed under SA objective 10 (water).

  The comment regarding Big Themes and quantum of development is for the attention of the Council as plan-makers.

- I note on page 82 of the Greater Cambridge Local Plan ¬– Sustainability Appraisal Scoping Report, that Cambridge Water considers development will be greater than supply by 2035.

  Stephen Tomkins and I came to that conclusion in 2013:

  Evans B & Tomkins SP. (2013) CAMBRIDGE WON'T HAVE ENOUGH WATER IN 2035. So What, Issue 4 Winter, page 7. So What is a publication of the Global Sustainability Institute, Anglia Ruskin University. In the reported debate the topic was proposed by Evans and seconded by Tomkins, representatives of Cambridge Water and the Environment Agency opposed this proposal.

  I am pleased Cambridge Water Company has now reached the same conclusion.

  - LUC response: Noted.

Respondent 2488 (member of the public)

- Respondent questions level of growth the Councils consider to be required.

  Suggests economic growth should not be considered good in itself and suggests economic growth should be concentrated in deprived areas nationally.

  Highlights they will undertake an allotment survey and requests this is taken into account when plan-making.

The plan should do nothing to encourage Stansted expansion or capacity increase and should consider how to reduce aviation.

If spatial framework phase 2 goes to 2050 then local plan should have the same horizon in order to meet the aim to “provide a complementary vision for the area.”

Calls for more ambitious net zero targets (2030 instead of 2050).

The respondent also comments on the consultation process for the Local Plan.

- LUC response: These points are for the attention of the Councils and do not comment on the SA.

- Mitigation

  I would extend the food growing point to say:

  “Creating opportunities for growing, distributing and serving food.”

  - LUC response: It is assumed this comment relates to SA 12 (climate change mitigation). It is noted that local food growing is part of the solution to minimising carbon emissions - this is covered under SA objective 4 and is not included here to avoid repetition/double counting. Distribution of food is beyond the scope of the local plan.

- Adaptation

  I would amend the last two points thus:

  “...the adaptation of agriculture and the whole of our food system.”

  “...trees and plants...resilient to a warmer climate which is drier in summer and wetter in winter.”

  - LUC response: It is assumed this comment relates to SA 11 (climate change adaptation). Agriculture is outside the scope of the Local Plan.

    Trees and plants are captured within 'green infrastructure'.

- The network of semi-natural spaces includes allotments. Please state that explicitly. Their primary purpose is growing food but the modern trend towards organic cultivation (and the occasional overgrown plot) make them valuable for wildlife too. It’s a significant amount of land: the city now has over 100 acres of allotments. I wonder if anyone knows the total allotment provision in South Cambridgeshire?

- LUC response: It is acknowledged that allotments can be valuable spaces for wildlife. The classification of 'semi-natural' that the SA draws on external data.

- Sustainability appraisal 3.20 states

  “Co-ordinating economic and housing growth, including considering the needs of people who work from home, could result in people working more locally and reducing in- and out-commuting, leading to reductions in emissions of greenhouse gases and air pollutants. As such, positive effects would be expected for SA objectives ... 12: climate change mitigation and 13: air quality.”

  That is simply not true unless the economic and housing growth is actually carbon-negative and actually cleans our air somehow. I think you mean that the co-ordination would act to minimise emissions and pollutants generated by the new population, which is fine, it just needs stating accurately please.

  - LUC response: Future iterations of the SA will ensure terminology refers to minimising, rather than reducing, carbon emissions, as appropriate.

Respondent 50054 (member of the public)

- The SA has also failed to identify, or test, the draft Issues and Options in relation to a second, related key issue: how to manage the conflicting imperatives of economic growth and the preservation and enhancement of the historic city of Cambridge in its historic landscape setting?

  The SA and Scoping Report note that all the Options will have negative effects on the historic environment, but without identifying or prioritising issues. There is inadequate recognition of Cambridge’s national and international significance as a historic city and “one of the loveliest cities in Western Europe” (David Attenborough). They do not mention that Cambridge meets at least 3 of the Outstanding Universal Value criteria (i, ii, iv) for World Heritage Site status, or suggest its historic environment should be valued accordingly. It is this level of international cultural and historic significance, expressed in the beauty of the historic city, which attracts students, workers, and visitors from all over the world. In this context historic Cambridge includes its whole associated landscape, including the upper Cam as far as Byron’s Pool and the lower Cam along the length of the Lents and Mays course as far as Baits Bite. The lower Cam section, although fully covered by Conservation Area designations, has been threatened by growth-related transport proposals; so have the West Fields. The arguably even more significant cultural landscape between Cambridge and Grantchester and beyond has no formal protection, with the

Grantchester Conservation Area boundary narrowly drawn and no Appraisal. While Grantchester Meadows are owned by Kings' College, this ownership neither provides direct protection from developments beyond their boundary, nor has any force in planning terms. The need for such protection is highlighted by the impacts on the Meadows of the combined height and bulk of the CB1 development.

This outstanding significance of Cambridge's historic environment is at high risk from growth pressures.

- LUC response: It is acknowledged that many of the topic areas overlap, but are necessarily somewhat siloed in the SA objectives to allow ease of interpretation and comparison between options. Future iterations of the SA will more clearly state that this is the case.

  Cumulative and synergistic effects can only be assessed once the Council has selected a preferred approach. As such, this will be included in future iterations of the SA, once policies have been drafted.

Axis Land Partnerships [7784] / Wates Developments (Anthony Pharoah) [9007]

- In reviewing the documentation prepared by the Council we recognise that this is an early stage in the plan's preparation and that an SA is an iterative process. At the outset we would note that recent challenges at examination of local plans have included substantive criticisms of the SA which goes well beyond the legal tests and into professional planning judgement. For example, examiners in the North Uttlesford Local Plan, North Essex Local Plan and St Albans Local Plan have recently requested information on alternatives that goes beyond the legal position of "reasonable alternatives" selected by the local authority using broad questions of judgement.
  - LUC response: Noted.
- The Issues and Options Report is largely of general content without spatial or specific focus, and consequently much of the assessment is general commentary.

  With only high-level options assessed at this stage, there is substantial uncertainty over the outcomes of these options. As such, the conclusions of the SA also are substantially uncertain, and more assessment is required with specific details provided on the deliverable projects which will make up these options.

There is a possibility that a preferred option will be advanced with an equally valid alternative discarded at this early stage due to lack of information. Additional assessment should take place at another local plan stage, with full assessments within the SA Framework, before any options are fully dismissed. Without a full consideration of all these options which considers substantive detail of deliverable sites, there is a risk of the plan's selected alternative not being properly justified, and the plan being found unsound at examination.

The options assessed in the issues and options report will likely only be achievable in combination with other options (e.g. some density within existing development, with some expansion to villages, etc). For transparency, the extent to which these options are likely to be combined in ultimate implementation should be made explicit in any future local plan documents which discuss these strategic options.

None of the options put forward in the Issues and Options Report are reasonable alternatives capable of meeting the objectives of the plan, as none of them is shown to be capable of meeting housing need and economic potential on their own. As none of the options are reasonable in current form, they will need to be re-assessed at a subsequent stage when sufficient detail is available to robustly evidence the selection of a preferred option.

- LUC response: Paragraph 3.29 of the Issues and Options SA acknowledges that more than one of these options could be taken forward, but it has not yet decided how any such combination would look. Due to this, and in order to aid the Council's decision-making, the SA considered each option on its own merits.

  The SA will assess all reasonable alternatives identified by the Councils at each stage of assessment. Once decisions have been made regarding which options to take forward, the SA will include a record of the Councils' reasons for this.

- The significant negative or positive effects given within the SA report are at this stage based on the limited information available misleading due to assumptions used and uncertainty attendant with such high level options. The SA Report notes a large number of points of uncertainty, but still identifies a number of significant effects (both positive and negative). However, there are assumptions for the significant effects identified which aren't clearly explained and which can be questioned. For example, Option 5 (Dispersal – villages) is attributed a significant negative effect to SA objective 6 (distinctiveness of landscapes) as it is assumed that expansion of these villages could have an adverse effect on the open countryside and landscape surrounding these villages, as well as village

character. As recognised in paragraph 3.61 the actual effect will depend on the final design, scale and layout of the proposed development.

  - LUC response: Assessments are considered appropriate to the level of detail provided at this stage and the uncertainty of this is recognised. With regards to the example given, relating to SA objective 6, this is based on professional judgement of experienced SA practitioners, and again, the inherent uncertainty is recognised.

- We recognise that SA is an iterative process which will evolve as a Local Plan progresses. More information should be provided on the approach to considering alternatives. The most substantive point we raise that this point is that the options set out in the Issues and Options Report should all be taken forward to subsequent local plan stages, where deliverable options should be assessed in detail, and transparent and objective assessment of these options provided at a subsequent SA stage. This will help ensure the Local Plan process and SA would support a hybrid of development scenarios which would underpin all development proposals at this stage.

  - LUC response: The SA will include an overview of how reasonable alternatives were identified and the Councils' reasons for taking these forward or otherwise.

Nathaniel Lichfield & Partners (Agent) [8776]

- We draw out some specific methodological points for consideration by the Councils, the overall conclusion and synthesis of the Sustainability Appraisal for the options (paras 3.116-3.119) is broadly concurred with, in particular that overall Option 3 performs better than Options 4, 5 and 6. Good growth on the edge of Cambridge City is inherently more sustainable across the range of themes than other spatial strategies which seek to distribute this growth more widely (either to villages, in new settlements or on transport corridors). This conclusion should be reflected in the Council’s next steps in determining a preferred spatial strategy.

  - LUC response: Noted.

- On SA objective 12 (climate change) the main likely effect from the different locations is rightly transport based... Indeed, the baseline should also recognise that - based on Census 2011 data - overall sustainable modes of transport (i.e. public transport, walking and cycling) in Cambridge City account for a 58% modal share*. This is only marginally reduced in the areas on the edge of the

City (e.g. Queen Edith's ward on the south east edge has 57% sustainable modes*). This compares to only 16% in Bourn Ward (Cambourne). Achieving shift onto sustainable transport modes will be difficult in locations beyond the City. Even on well served public transport corridors, it is very unlikely such locations could achieve more than half of journeys to work being made by sustainable modes (e.g. bus, walking, cycling etc.); the uniqueness of Cambridge City is its ability to engender walking and cycling as a preferred mode of transport because of its location. In our view the SA appraisal does not go far enough to recognise this distinction; growth on public transport corridors, based on the baseline evidence, would a) not generate the same modal split towards sustainable modes and b) would still create longer journeys, which even if taken by bus (for example), would still have a greater impact on climate change than equivalent journeys walking or cycling (which are ultra-low impact). Option 6 should be scored relatively lower (e.g. mixed minor effects) on SA objective 12 than the equivalents for Option 2 and 3 on the edge of Cambridge.

*Lichfield's analysis, noting that their figures do not include passengers in cars and 'edge of Cambridge' analysis considered two wards.

- LUC response: The baseline will be expanded to include more information on sustainable mode share in Cambridge City, compared to South Cambridgeshire.

  The SA assesses each option on its own merits, against the baseline and the likely future baseline without the plan. Effects identified are therefore not relative to other options. Nevertheless, the Councils have now developed these options, allowing more nuanced SA assessment.

- There is an inconsistency on SA objective 11 between the assessment for Option 2 reported at page 37 (i.e. "-?" minor negative but uncertain effects) and that then included on the summary table at page 47 (i.e. "++/-?" mixed significant positive and minor negative effects). It is assumed this is a typographical error, rather than a change to the scoring within the conclusion, but it risks presenting that Option 2 scores better than it actually does against climate change objectives (whereas it should be comparable with other edge of Cambridge options).

  - LUC response: Correct, this is a typographical error and it is corrected in this iteration of the SA Report.

- The assessment of SA objective 14 and at para 3.106 appears to identify concentration of economic activity as a 'negative effect'. Furthermore, it appears to be one of the same scale as to the positive effects that could accrue from shifting towards putting such employment on transport corridors beyond the

City. This misunderstands the functional economic market of Cambridge and the growth sectors which new employment land and premises will be serving (as summarised in the SA Scoping baseline). Many of these are overwhelmingly focussed within or on the immediate fringe of Cambridge City and have grown in that way because of clustering effects and agglomeration benefits. Such economic growth potential may be curtailed by dispersal of new employment provision beyond the City; the likely significant effects of pushing growth out is that, in a competitive environment, inward investment is lost to competing centres (both nationally and globally given the sectors Cambridge is home to). There are likely significant negative impacts of such an approach which are not reflected in the SA appraisal, particularly with the assessment that Option 6: transport corridors would likely score as well as Edge of Cambridge locations on SA objective 14.

- LUC response: The SA recognises the benefits of employment development within Cambridge City. The negative effect identified reflects the fact that focusing all employment development within Cambridge City and not providing for any employment land elsewhere would not provide for economic needs within South Cambridgeshire.

  Option 6 would be expected to support the economy in Cambridge City as well as elsewhere, given that development on public transport corridors would link workers to Cambridge City centre. As mentioned above, options are assessed against the baseline and likely evolution of this without the plan, rather than relative to each other.

Bidwells

- The respondent highlights the high level nature of the options assessed and the resultant uncertainty in the SA.

  The actual strategy will involve some or all of these options. Moreover, there is a possibility that a preferred option will be advanced with an equally valid alternative discarded at this early stage due to lack of information. Additional assessment should take place at another local plan stage, with full assessments within the SA Framework, before any options are fully dismissed. Without a full consideration of all these options which considers substantive detail of deliverable sites, there is a risk of the plan's selected alternative not being properly justified, and the plan being found unsound at examination.

  None of the options put forward in the Issues and Options Report are reasonable alternatives capable of meeting the objectives of the plan, as none of them is shown to be capable of meeting housing need and economic

potential on their own. These are not positively prepared, nor justified.As none of the options are reasonable in current form, they all need to be re-assessed at a subsequent stage when sufficient detail is available to robustly evidence the selection of a preferred option.

Alternatives which consider combinations of the above options should be tested.

- LUC response: All reasonable alternatives identified by the Councils at this stage were subject to SA. The Councils have since carried out further consideration of spatial strategy alternatives, which will be subject to SA.

  Site options will be assessed in future iterations of the SA.

  The SA assessment can only reflect the level of detail of the options under consideration.

  Paragraph 3.29 recognises that more than one of the assessed options could be taken forward.

  It is not considered proportionate to assess all possible combinations of the spatial options presented. However, reasonable alternatives, including combined options, as identified by the Councils, will be subject to SA.

- Other policy priorities for the council could be tested through the SA alternatives process, such as closure of large portions of the city centre to motorised vehicular traffic. These are substantive issues and options for the local authority, which would benefit from the SA process.
  - LUC response: Policy options will be assessed at a later stage of SA.
- As the local authorities have both declared a climate emergency, the SA could be used to refine policy responses to climate change, as different climate change scenarios will be of interest at examination, and are a policy priority for the councils. For example, the SA could address local plan responses to climate change scenarios.
  - LUC response: The SA will assess all reasonable alternatives identified by the Councils. Climate change will be considered via SA objectives 11 (Adaptation to climate change) and 12 (Climate change mitigation). The SA will make recommendations for policies where appropriate.
- The significant negative or positive effects given within the Issues and Options SA report are misleading due to assumptions used and uncertainty attendant with such high level options. The SA Report notes a large number of points of uncertainty, but still identifies significant effects (both positive and negative). However, there are assumptions for the significant effects identified which aren't clearly explained and which can be questioned. For example, Option 6

(Development Along Transport Corridors) is attributed a significant negative effect to SA objective 6 (distinctiveness of landscapes) as it is assumed that development along the transport corridors will "string" along transport corridors (paragraph 3.62). In practical terms this is unlikely to happen as there are so few viable locations along the transport corridors. Moreover, this possible significant effect can be managed through standard policy mitigation and is not a reason to discount this as an option. These assumptions and uncertainties fundamentally undermine the significance determination provided now, which needs to be refined at additional local plan stages.

  - LUC response: As stated, the SA recognises the uncertainty in assessments and paragraph 2.17 of the Issues and Options SA states 'Due to the high level nature of options assessed at this stage, all potential effects identified are uncertain'. The role of the SA is to highlight potential effects and it takes a precautionary and transparent approach to doing so, by not assuming any particular details about design or mitigation, as explained in paragraph 2.21 of the Issues and Options SA Report. The SA does not discount any of the options.

- We note that due to uncertainty the potential for mitigation at a site specific level is not considered (paragraph 2.21). This is appropriate to the level of detail available, but it would be unhelpful to dismiss sites at this stage for which standard and not complex mitigation will accommodate development. To that end unmitigated significant effects identified at this early stage need to be refined at subsequent stages.

  - LUC response: The SA does not dismiss any options or sites. In order to ensure all sites are assessed on an equal basis, the SA will not make any assumptions about mitigation when assessing site options. Any mitigation included in policy proposals will be recognised when assessing those policies.

- These is a tendency within SA practice to rely on assumptions and/or be overly positive about emerging preferences, leading to an unbalanced assessment that does not stand up to examination. At this early stage in the SA process we advise that a means of adding objectivity to the assessment is developed and consulted on. This could be developed by the SA consultants, and could be a sensitivity test of the assessment, double-assessment by two independent parties, or another means of adding objectivity and rigour within mixed methods research such as an SA.

  - LUC response: The SA is being carried out by independent consultants and professionals bound by codes of ethics by their professional bodies. It is being carried out in line with regulatory requirements and good practice and

the methodology is designed to ensure a consistent assessment between options, particularly with regards to the site appraisal criteria.

- SA is an iterative process which will evolve as a Local Plan progresses. More information should be provided on the approach to considering alternatives according to the Local Development Scheme. This should set out the approach to proper justification of a selected spatial strategy, which is reasonable and deliverable through projects. Key points which should be addressed in the methodology include:

  - The stages going forward for refining the strategic options consulted on now into reasonable alternatives comprised of proposed allocations.

  - How mitigation will be considered. While it is appreciated that the legal basis is for no mitigation to be considered to ensure all sites are considered on an equal basis, this is misleading as there will be mitigation information available for some sites. A standardised approach to mitigation, allowing for the use of typical mitigation (SUDS, CEMPs, etc) and consulted on, would help with this.

  - Where large new settlements are proposed, the SA should be clear on how full allocations will be assessed where they will be delivered outside of the plan period.

  - Deliverability of major sites, including infrastructure assumptions.

  - Built out rates (which reflect infrastructure assumptions).

  - Quantitative criteria applied to various site sizes, such as number of new homes required for a primary and secondary school.

  - LUC response: It is the Councils' responsibility to identify and develop reasonable alternatives. The SA will assess the reasonable alternatives identified and give an outline of how those alternatives were identified.

    As stated above, no assumptions will be made about mitigation when assessing site options. This is both in order to ensure all sites are assessed on an equal basis and because there is no certainty as to what will be required/come forward until the plan is adopted. The SA will be precautionary as a key role of the SA is to highlight potential issues, so that these can be addressed by Local Plan policies, or other appropriate mechanisms. Mitigation included in proposed policies will be considered when assessing those policies and when considering cumulative effects.

    It is not the role of the SA to assess the deliverability of sites. If sites are not deliverable, it is assumed they will not be identified as reasonable alternatives.

Other points noted.

SA Report for First Proposals (Regulation 18: Preferred Options) (November 2021)

Summary of SA related consultation comments

A.5 Some respondents such as Parish Councils and Statutory Bodies welcomed the production of the SA, however there were some comments noting that the report was flawed or could be improved. A large number of landowners/developers questioned the assessments conclusion that development in the villages would not be sustainable, when some have good access to sustainable modes of transport and a good range of services and facilities and are in need of affordable housing. The majority of these comments were also promoting a particular site within a village location and seeking to demonstrate why the site would have a more positive sustainability outcome than the preferred development strategy. There was also some criticism from developers/landowners of the process for identifying and appraising the sites in the SA.

A.6 Concerns were raised regarding whether the SA adequately assessed the in-combination effects of the relocation of the Cambridge Waste Water Treatment Plant compared with the preferred Anglian Water site at Honey Hill and whether a decision on the NEC site should be made ahead of a future assessment. There were also some suggestions for improvements to the SA framework and making use of up-to-date evidence in the next iteration of the SA to accompany the Draft Local Plan.

A.7 The following section groups the consultation comments into common themes and provides a response to those themes (in the bullet points below).

Summary of Responses to Consultation Comments by Theme

Assessment of Sites

A.8 Several representations were made with regards to the strategic site, North East Cambridge. Various respondents noted that the inclusion of North East Cambridge is premature as it is predicated on the relocation of the Cambridge Waste Water Treatment Plant (WWTP). As such, the SA should also assess the effects of the proposed relocation. However, the North East Cambridge policy and the detail set

out in the North East Cambridge Area Action Plan (NECAAP) is based on the fact that the relocation of the WWTP will have taken place.

- LUC response: Waste provision is the responsibility of the County Council as Minerals and Waste Authority, and the WWTP relocation project is being taken forward, led by Anglian Water, under the Development Control Order (DCO) process, which is subject to its own environmental assessment process. The WWTP relocation project process is therefore a separate process to the Local Plan and NECAAP being prepared by the City Council and South Cambridgeshire District Council as the local planning authorities. As set out in Chapter 1 of this SA, the Government announced in August 2025 that it will not be funding the relocation of the Cambridge WWTP which means that there is uncertainty as to whether this will take place and as a result whether the effective delivery of the residential component of the Councils' vision for North East Cambridge will take place. Ahead of the Proposed Submission stage of the Local Plan in 2026, the Councils will continue to engage with relevant partners to confirm a refined position for that later plan-making stage, which will inform the SA of the Proposed Submission Local Plan. At that stage any in combination effects can be addressed in the SA.

A.9 A number of landowners/developers considered that sites should be reassessed when the SA is updated.

- LUC response: All site options considered in the First Proposals document were appraised consistently using the assumptions set out in Appendix D of this SA Report. Once the Council had selected the preferred/proposed sites to be allocated and drafted site-specific allocation policies, considering the SA findings and other relevant information, the site allocation policies were then appraised. New and amended site options put forward during the First Proposals consultation have now been appraised in the same way, and the findings are set out in this report. This iterative approach to SA is consistent with the requirements of the SEA Regulations and good practice. Further detail on how sites were identified and tested can be found at paragraph E.18 in Appendix E of this SA Report.

A.10 Historic England welcomes the SA report but suggest that the SA should have drawn out the different impacts of individual sites more.

- LUC response: Individual impacts for each site option have been presented in the summary score tables in Chapter 4 of this SA Report.
- LUC response: It should be noted that although the Regulation 18 version of the Local Plan that was appraised in the November 2025 SA Report identified preferred/proposed site allocations, the Council has not yet finalised the sites to

be allocated in the Greater Cambridge Local Plan. Further appraisal work and consultation will also be undertaken during the Regulation 19 stage before the final site allocations are confirmed.

Assessment of Development Strategy

A.11 Various respondents stated that there is currently a lack of reasonable alternatives being assessed within the SA, especially with regard to the quantum of development considered.

- LUC response: The SA must consider all reasonable alternatives as a Plan evolves. Chapter 4 of this SA Report sets out the process that has been followed looking at different strategic spatial options at different levels of growth and the SA that was carried out to inform the development of the Local Plan document. This SA Report includes an appraisal of the growth required based on the Councils' updated objectively assessed needs.
- LUC response: Chapter 5 of the SA Report sets out the SA findings for the proposed policy approaches and reasonable alternatives identified during the preparation of the version of the Local Plan subject to appraisal. It also sets out alternatives that were considered but deemed to not be reasonable, with an explanation of why they were not considered to be reasonable.

A.12 Natural England notes that the appraisal of Strategic Spatial Options (SSOs) is based on the interim draft findings of the emerging Landscape Character Assessment and that this will need updating following conclusions of this work.

- LUC response: The SA of SSOs was based on the interim Landscape Study prepared for the SSOs (Greater Cambridge Local Plan Strategic Spatial Options assessment: Landscape (November 2020) and Supplement Report (February 2021). No materials changes have been made to this document since the interim study was prepared, therefore no further updates are required.

A.13 One respondent noted that the lasting impacts of the pandemic should be considered further within site assessments.

- LUC response: COVID-19 has led to far-reaching changes to society in the UK and around the world. The SA considers COVID-19 through the baseline information and the appraisal questions of SA objective 14: Economy have been updated to now reference the pandemic.

A.14 Some respondents noted that the SA has not sought to make the emerging Local Plan more sustainable, especially with respect to the assessment of development in or around villages and on the edge of Cambridge.

- LUC response: The SA Report assesses twelve Strategic Spatial Options, each with a different focus for growth. The SA Report sets out the positive and negative effects associated with each option. At the time these options were assessed, the Councils advised that more than one would likely be taken forward, but each was assessed on its own merits in order to help decision-making in this regard. Any potential effects that could arise at particular locations where development could come forward under an option influenced the overall likely effect recorded. The effects associated with Option 5: Dispersal – villages found that there are more negative effects than positive effects associated with this spatial option. While there may be some sustainable locations within villages, on balance the SA found this option is likely to take place on greenfield land or Grade 1, 2 or 3 agricultural land, have a higher dependency on the private car and existing centres of services and facilities and employment are likely to be less accessible. However, it was noted that this option could lead to less significant landscape change due to the likely smaller size of individual developments. Further to this, the SA Report assesses Dispersal: Village site options, based upon the site assessment criteria which are set out in Appendix D of the SA Report. Drawing from the Council's HELAA assumptions, the site assessment criteria state that sites that are further than 2,000m of a defined city, district, local, neighbourhood, rural or minor rural centre will have uncertain significant negative effects. Some of the Dispersal: Village site options were found to be more sustainable than others since they were located close to an existing centre, school or public transport; however, the majority of Dispersal: Village site options are expected to have negative effects for access to services and facilities (SA 2a and 2b), because they are not within close proximity to an existing centre or education facilities. In combination, the assessment of the strategic spatial options provides a broad view of the potential options for the distribution of growth while assessments of the site options are able to provide more detail as they focus on specific areas.
- LUC response: The purpose of the SA is to assess the extent to which the emerging plan, when judged against its reasonable alternatives, will help to achieve relevant environmental, social, and economic objectives. This identification of likely sustainability effects is being carried out as an iterative process, allowing it to inform the Councils' development of the plan and avoid or mitigate potential negative effects where appropriate. The Councils are using this work alongside other evidence to inform the emerging Local Plan strategy, and the Councils' reasoning for the selection of specific options over alternatives is reported in the SA.

A.15 Further to the above, some respondents noted that the SA Report does not provide a critical review of the evidence provided by the Councils.

- LUC response: It is not the role of the SA to appraise Local Plan evidence; instead it must assess the effects of the Plan and its reasonable alternatives in light of relevant baseline information. Evidence provided by the Councils has been used to inform the SA of the Plan and its reasonable alternatives. The SA of the First Proposals Plan was informed by a variety of evidence base documents, which are as follows:
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Water Management (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Habitats Regulations Assessment (HRA) (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Landscape (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Employment (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Housing Delivery (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Infrastructure (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Transport (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Green Infrastructure (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Equalities Impact Assessment (EqIA) (November 2020) and Supplement Report 2021.
  - Greater Cambridge Local Plan Strategic Spatial Options assessment: Zero Carbon Study (November 2020) and Supplement Report 2021.
  - Strategic Heritage Impact Assessment (2021) and Supplement Report 2021.
- LUC response: The SA of the options was undertaken using all available evidence at the time of writing. As such, there may be gaps in this evidence base that, where possible, will be filled as information and data to inform the Local Plan preparation process continues.

SA framework

A.16 Various respondents noted that the following topics are not covered within the SA framework, specifically sustainable resource use, waste minimisation, implications of access and public transport facilities and reliance on the private car. In this regard, the following should be noted:

- The Minerals and Waste Planning Authority encouraged the consideration of 'sustainable resource use' or 'waste minimisation' within future sustainability objectives.
  - LUC response: The SA does consider the Local Plan's implications for ‘sustainable resource use’ and ‘waste minimisation’ via SA objective 8: Efficient use of land, SA objective 9: Minerals, SA objective 10: Water and SA objective 12: Climate change mitigation.
- Central Bedfordshire Council noted that no objective covers transport and access.
  - LUC response: The SA does consider the Local Plan's implications for access and public transport via SA objective 2: Access to services and facilities, SA objective 4: Health, SA objective 12: Climate change mitigation, SA objective 13: Air quality and SA objective 15: Employment.
- Gamlingay Parish Council noted that the Gamlingay Neighbourhood Plan SEA supports the principle that South Cambridgeshire District Council must lower the reliance on the private car.
  - LUC response: Noted, the SA considers the Local Plan’s implications for reliance on the private car via SA objective 2: Access to services and facilities, SA objective 12: Climate change mitigation, and SA objective 13: Air quality.
- L&Q Estates noted that updates to policy and Government strategy could precipitate alterations to the SA framework, especially with regard to climate change.
  - LUC response: During each stage of the SA process a review of the SA baseline is undertaken and appropriate updates to the SA Framework will be made as needed.

Conclusion and Mitigation

A.17 Various respondents have questioned the validity of the SA Report’s initial findings on the grounds that additional factors and updated information have come to light. While Natural England expressed support for the SA, Natural England

specifically stated that it is too early to state whether the Local Plan performs well in sustainability terms due to the current absence of strategic water supply infrastructure and sustainable interim measures. Various respondents also noted that mitigation measures and in-combination effects should be factored into the SA report.

- LUC response: The SA is written with the consideration of all available evidence at time of writing. Updates to the baseline information will be included in each iteration of SA where available and appropriate. The next iteration of the SA will also consider the combined effects of the Plan as a whole and in-combination with other Plans and Programmes. As such, the overall SA findings may change as the SA progresses.

SA Report for Draft Local Plan (Regulation 18) (November 2025)

Great Shelford (Ten Acres) LLP

A.18 The response is focused on the SA of the site options in relation to Great Shelford, and associated tables including Table 4.6.

- 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. The respondent suggests for the HELAA evidence base to be updated where there are out of date assumptions. This should be included in the revised SA.
  - LUC response: All site options considered in the preparation of the Local Plan at each stage have been appraised consistently using the assumptions set out in Appendix D of this SA report, and drawing on the Councils' HELAA ratings, which has also been updated where necessary to take account of updated evidence. Once the Councils had selected the preferred/proposed sites to be allocated and drafted site-specific allocation policies, considering the SA findings and other relevant information, the site allocation policies were then appraised. New and amended site options put forward during the First Proposals and Regulation 18 consultation in 2025 have now been appraised in the same way, and the findings are set out in Chapter 4 of this report. This iterative approach to SA is consistent with the requirements of the SEA Regulations and good practice. Further detail on how sites were

identified and tested can be found from paragraph E.18 in Appendix E of this SA Report.

Endurance Estates

A.19 The response is focused on the SA of the site options in relation to the Edge of Cambridge and the Southern Cluster, and associated tables including Table 4.5, and 4.6.

- The Sustainability Appraisal supports the Southern Cluster's potential to enhance housing location relative to employment centres and provide new services, which is endorsed by Endurance Estates.
  - LUC response: Noted. No action required.
- 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.
  - LUC response: The SA has assessed a number of Strategic Spatial Options, during the Local Plan preparation, as set out in detail in Appendix C, including a 'Dispersal – villages' option and a 'Public transport corridors' option, which both included smaller sites spread across rural centres, minor rural centres and villages. The previous SA Reports have set out the positive and negative effects associated with each option, and these are re-presented in Appendix C. The Councils' justification for selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.
- Endurance Estates promotes Land East of Gazelle Way 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.
  - LUC response: All site options considered in the preparation of the Local Plan at each stage have been appraised consistently using the assumptions set out in Appendix D of this SA report. The Sustainability Appraisal provides an evidence-based assessment of sites identified and tested through the plan-making process but does not determine site allocation, that is the role of the plan-makers and their justification for allocating some sites and not allocating others is provided in Appendix E. No change to the SA is required.

- 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. The Sustainability Appraisal's failure to adequately assess reasonable alternatives, particularly in relation to land release from the Green Belt near Cambridge, jeopardises the plan's soundness.
  - LUC response: The Sustainability Appraisal informs the plan-making process and assesses a proportionate range of reasonable alternatives identified through that process. It is the Councils' responsibility to identify and develop reasonable alternatives. As explained above, the SA has assessed the reasonable alternative spatial strategy options identified, including dispersing growth to villages, and supporting a high-tech corridor by integrating homes and jobs in the southern cluster and provided an outline of how those alternatives were identified (see Appendix C).
- There are concerns regarding the Sustainability Appraisal's failure to adequately assess the full breadth of reasonable alternatives, particularly in relation to land release from the Green Belt near Cambridge. The inadequacy of the SA risks the overall soundness of the plan and must be urgently rectified. Suggests that the Sustainability Appraisal is revised to ensure that all reasonable alternative sites, particularly on the Edge of Cambridge and in the Rural Southern Cluster are considered fully
  - LUC response: The Sustainability Appraisal informs the plan-making process and assesses a proportionate range of reasonable alternatives identified through that process. The Councils have tested more than 800 sites through the Greater Cambridge Housing and Employment Land Availability Assessment (HELAA), in a wide range of locations across Greater Cambridge. The Councils identified whether site were reasonable alternatives for the SA by focusing on sites informed by the emerging preferred strategy option, and the HELAA findings as to whether a site was suitable, available and achievable for development. The SA has assessed the reasonable alternatives identified at each stage and the findings are presented in Chapter 4 of the SA Report, and an outline of how those alternatives were identified in Appendix E.
- 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.
  - LUC response: Noted. No action required.

A.20 A separate response from Endurance Estates raises the following concerns:

- Considers that the SA does not adequately address the need for affordable housing, particularly in light of evidence identifying a 'very acute' need. It is argued that reliance on larger strategic sites may reduce affordable housing delivery due to viability constraints, and that the Plan does not include sufficient smaller or dispersed sites to address this.
  - LUC response: The SA has assessed a number of Strategic Spatial Options, during the Local Plan preparation, as set out in detail in Appendix C, including a 'Dispersal – villages' option, which relies on smaller, dispersed sites. The previous SA Reports have set out the positive and negative effects associated with each option, and these are re-presented in Appendix C. The Councils' justification for selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.
- The respondent advocates for a more dispersed pattern of development, including allocations in Minor Rural Centres with good sustainable transport links, to support affordable housing delivery.
  - LUC response: As above.

FutureIN

A.21 The response is focused on the suggested policy requirements for new development.

- The respondent considers that all new housing developments should be required to have Air Source Heat Pumps (ASHPs) rather than gas boilers in the future given the severity of the climate crisis. Notes that some local authorities make this a requirement so there is no excuse for Greater Cambridge not to do this, especially as central government has bottled out of making a decision to do this.
  - LUC response: This comment is largely for the Councils as decision makers, rather than the SA. The Local Plan already includes Policy CC/NZ: Net zero carbon new buildings, which requires that where appropriate, new development must achieve net zero operational emissions by following a hierarchical approach of reducing heat and power demand. By supporting the delivery of net zero buildings in the plan area, new housing developments will be designed to be more energy efficient, incorporating low-carbon heating and cooling. The SA assessed this policy as having a significant positive effect in relation to SA objective 12: climate mitigation and a minor positive effect in relation to SA objective 13: climate change adaptation. It is noted that the Future Homes and Buildings Standard coming into force in 2027 will update current Building Regulations and require new

builds to have 75-80% lower carbon emissions compared to older home and will mandate low-carbon heating systems such as air source heat pumps **[See reference 1]**.

- Respondent states that Cambridge has been branded as one of the most unequal cities in the UK and therefore those profiting from its growth should make contributions to those in need. Social value plans should 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.
  - LUC response: Noted. This comment is largely for the Councils as decision makers, rather than the SA.

Guilden Morden Developments Ltd

- 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, the respondent 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.
  - LUC response: The Sustainability Appraisal informs the plan-making process and assesses a proportionate range of reasonable alternatives identified through that process. It is the Councils' responsibility to identify and develop reasonable alternatives and this has been done for spatial strategy options, site options and policy options, as explained in Chapters 2 and 4 of the SA Report, as well as Appendices C, E, F and G.
- 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.
  - LUC response: The SA has assessed a number of Strategic Spatial Options during the Local Plan preparation, as set out in detail in Appendix C, including a 'Dispersal – villages' option. The previous SA Reports have set out the positive and negative effects associated with each option, and these are re-presented in Appendix C. The Councils' justification for selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.
- Disagrees with the proposition in the Development Strategy Topic Paper 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.

- LUC response: Noted. The Councils’ justification for identifying the reasonable alternatives and selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.

Nightingale Land and Hill Residential Ltd

- 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.
  - LUC response: The SA has assessed a number of policy options at each stage during the Local Plan preparation up to Regulation 19, as set out in detail in Appendix G. The positive and negative effects associated with each reasonable alternative policy option were set out in earlier SA Reports and are re-presented in Appendix G. As required by the SEA Regulations, an outline of the Councils’ reasons for rejecting those reasonable alternative policy options is also provided in Appendix G.
- 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.
  - LUC response: Noted. Grey Belt has been considered through a separate study for the Councils and in the Strategy Topic Paper and Appendix 4 of the Strategy Topic Paper.

Vistry Group

- 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 an appropriate quantum and mix of housing. Vistry and The Quy 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

- LUC response: Noted. The Councils' HELAA study considered sites in a consistent way. No action required.

Historic England

- 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 are assessed as uncertain.
  - LUC response: All site options considered in the Draft Local Plan document were appraised consistently using the assumptions set out in Appendix D of this SA Report. Uncertainty is generally expressed, as the effects will depend on the specific design and layout of development proposals as they are put forward for planning permission.
- 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.
  - LUC response: Specific site allocations within the policies have now been separated out. Please refer to Chapter 5 of the SA report.
- The SA would benefit from an overall summary table.
  - LUC response: An overall summary table has been provided in the cumulative effects chapter of the SA report (Chapter 6).
- It would be helpful if the SA included a series of clear recommendations for the Regulation 19 version of the Plan.
  - LUC response: Recommendations were provided at earlier stages of the SA process, including the Issues and Options stage, where they informed the iterative development of the Local Plan. As the plan has progressed, policy wording has been refined in response to earlier SA findings and consultation responses.

Sawston Parish Council

- The response relates to site S/GF: Land adjacent to A11 and A1307 at Grange Farm. It is noted that Little Abington would only be separated from the site by the A1307 and therefore considers that the objective referenced in paragraph 5.196 would not be achievable in practice for that village.
  - LUC response: It is assumed that the respondent is referring to the point made in para. 54.196 of the Regulation 18 SA Report that said "The development of the site is also required to ensure that distinction remains between the new settlement and nearby existing settlements including Little Abington and Babraham." This statement reflected a requirement stated in the site allocation policy S/GF. The rest of the paragraph relates to the effects identified for this policy in relation to landscape character (SA objective 6) which overall were mixed minor positive and significant negative effects, with uncertainty noted due to the potential to achieve appropriate mitigation in relation to landscape character will depend partly on the design of any proposals for the site.

Corpus Christi College, Cambridge

- The Sustainability Appraisal for the Regulation 19 Local Plan should consider Grey Belt allocations as a reasonable alternative scenario, particularly in the event that higher levels of housing growth are required. The respondent promotes Land at Bury Farm, Stapleford as sustainable Grey Belt land suitable for allocation to help meet identified housing needs.
  - LUC response: Noted. All reasonable alternative site options that have been submitted to GCSP have been subject to the SA process, as set out in Chapter 4 of the SA Report. Grey Belt has also been considered through a separate study for the Councils and in the Strategy Topic Paper and Appendix 4 of the Strategy Topic Paper.

Gladman Developments

- The Sustainability Appraisal should clearly justify the policy choices made in the Local Plan, including decisions to allocate or not allocate sites, with transparent comparison against reasonable alternatives. The respondent highlights the requirement for the SA to demonstrate why certain options have been progressed and others rejected.
  - LUC response: The SA has assessed a number of policy options at each stage during the Local Plan preparation up to Regulation 19, as set out in

detail in Appendix G. The positive and negative effects associated with each reasonable alternative policy option were set out in earlier SA Reports and are re-presented in Appendix G. As required by the SEA Regulations, an outline of the Councils' reasons for rejecting those reasonable alternative policy options is also provided in Appendix G.

- All reasonable alternative site options considered in the preparation of the Local Plan at each stage have been appraised consistently (see Chapter 4) using the assumptions set out in Appendix D of this SA report, and drawing on the Councils' HELAA ratings, which has also been updated where necessary to take account of updated evidence. Once the Councils had selected the preferred/proposed sites to be allocated and drafted site-specific allocation policies, considering the SA findings and other relevant information, the site allocation policies were then appraised (see Chapter 5). Further detail on how sites were identified and tested can be found from paragraph E.18 in Appendix E of this SA Report, along with the Councils' justification for allocating some sites and not allocating others.

G W Balaam & Son

- The Development Strategy in Policy S/DS is disproportionately focused on large strategic sites and new settlements, with limited provision for small and medium-sized sites. They consider this approach is inconsistent with national policy, particularly paragraph 73 of the NPPF, which emphasises the importance of smaller sites in housing delivery, and is no justified within the SA.
  - LUC response: The SA has assessed a number of Strategic Spatial Options, during the Local Plan preparation, as set out in detail in Appendix C, including a 'Dispersal – villages' option and a 'Public transport corridors' option, which both included smaller sites spread across rural centres, minor rural centres and villages. The previous SA Reports have set out the positive and negative effects associated with each option, and these are re-presented in Appendix C. Approximately 200 residential/mixed use reasonable alternative site options with a range of sizes have been subject to SA, as set out in Chapter 4. The Councils' justification for selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.

Miller Homes

- The respondent considers that the allocation of new housing on strategic sites that are outside Cambridge Centre and beyond the green belt, is not

sustainable. This is due to the potential over reliance on the private vehicle to be able to access services, facilities and employment opportunities. The respondent notes that the Sustainability Appraisal 2025 identifies this as a potential for concern of development 'jumping' the green belt, meaning some elements of development will be provided in locations that are less well related to existing services, facilities and jobs, which may result in increases in vehicle travel.

  - LUC response: Noted. The respondent is referring to the SA effects identified in the 2025 SA Report in relation to Policy S/GB: The Cambridge Green Belt. No action needed.

- The respondent considers that the current strategy relies too heavily on large strategic sites, which may increase environmental impacts and limit the diversity and choice of housing across the area.

  - LUC response: The SA has assessed a number of Strategic Spatial Options, during the Local Plan preparation, as set out in detail in Appendix C, including a 'Dispersal – villages' option and a 'Public transport corridors' option, which both included smaller sites spread across rural centres, minor rural centres and villages. The previous SA Reports have set out the positive and negative effects associated with each option, and these are re-presented in Appendix C. Approximately 200 residential/mixed use reasonable alternative site options with a range of sizes have been subject to SA, as set out in Chapter 4. The Councils' justification for selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.

LGH Hotels Management Limited

A.22 The respondent makes various points relating to how the SA has dealt with Green Belt in spatial options, the extent to which options comprising smaller, dispersed sites have been assessed and how SA factors in revised national Green Belt policy:

- Notes that evidence in the Cambridge Housing Delivery Study Addendum highlights the benefits of a more dispersed spatial strategy in increasing market absorption rates and providing a wider choice of housing. It is also noted that national policy changes may further support delivery, including brownfield development and mixed tenure schemes.

- Notes that the spatial strategy options assessed (Options 9a, 10a, 11a and 11b) all include relatively limited or no development in villages. They suggest that a reasonable alternative involving a greater proportion of mid-sized developments

(i.e. 200 – 700 dwellings) has not been considered and should have been assessed.

  - LUC response: The SA has assessed a number of Strategic Spatial Options, during the Local Plan preparation, as set out in detail in Appendix C, including a 'Dispersal – villages' option and a 'Public transport corridors' option, which both included smaller sites spread across rural centres, minor rural centres and villages. The previous SA Reports have set out the positive and negative effects associated with each option, and these are re-presented in Appendix C. Approximately 200 residential/mixed use reasonable alternative site options with a range of sizes have been subject to SA, as set out in Chapter 4. The Councils' justification for selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.

- Queried how considerations such as market absorption rates and updated national policy (including support for development in the Green Belt and grey belt) have been factored into the Sustainability Appraisal when assessing strategic options.
- Refers to the SA commentary that larger strategic sites may deliver lower levels of affordable housing due to infrastructure costs, potentially offset by smaller sites. Argues that the SA does not adequately consider the role of the 'Golden Rules', particularly the provision of higher levels of affordable housing (e.g. 50%) as part of an alternative approach.
- Raises concerns that development in the Green Belt is scored less favourably in the SA due to assumptions about inefficient land use and considers that the SA does not adequately reflect changes in national policy, particularly in relation to Grey Belt land.
- Suggests that the Sustainability Appraisal appears to penalise Green Belt sites on the edge of Cambridge, noting in particular that such sites are 'marked down' due to constraints around demonstrating very special circumstances and the inability to 'twin-track' planning applications alongside plan-making.
  - LUC response: Designation of Green Belt, or its release for development is not a sustainability consideration. The SA does not need to take Green Belt policy into account, it assesses the sustainability implications of spatial options in a 'policy off' approach. Grey Belt has been considered through a separate study for the Councils and in the Strategy Topic Paper and Appendix 4 of the Strategy Topic Paper.

SmithsonHill

- Refers to the SA assessment of growth quantum options and notes that Policy S/JH is identified as the preferred option on the basis that it aligns with the standard method and the 'most likely' job growth scenario. They argue that the exclusion of a higher job growth scenario from the SA on the basis that it is not the most likely is inappropriate.
- Considers that a higher job growth scenario (approximately 25% above the central scenario) represents a reasonable alternative that should have been assessed through the SA, particularly in light of evidence of economic growth potential.
  - LUC response: The SA assessed three growth scenarios as part of the spatial strategy options assessment, including a "Maximum – higher employment-led" growth scenario, as explained in Chapter 4 and Appendix C of the SA Report. The Councils reasons for selecting and the development strategy are contained in Appendix E.
- Disputes the SA finding for Policy S/JH that the proposed level of housing and employment growth is likely to support self-containment and reduce long-distance commuting, arguing that higher levels of job growth without matching housing provision will undermine this objective.
  - LUC response: Noted.

Mr Jerram Clifford

- Notes that Grange Farm was not identified through the earlier Call for Sites process and suggests it appears to replace the Cowley Road wastewater site, which is considered to be a more sustainable brownfield option expected to come forward. Asserts the proposed allocation of land at Grange Farm under Policy S/GF is not sound, justified or deliverable. The site is assessed as RED in the HELAA, with significant constraints relating to landscape sensitivity, heritage, transport and water resources, yet is proposed at a scale that exceeds assessed capacity and housing need.
  - LUC response: All site options considered in the preparation of the Local Plan at each stage have been appraised consistently using the assumptions set out in Appendix D of this SA report. The Sustainability Appraisal provides an assessment against all the SA objectives of sites identified and tested through the plan-making process but does not determine site allocation, that is the role of the plan-makers and their justification for allocating some sites and not allocating others is provided in Appendix E.

- Suggests that alternative locations, including Six Mile Bottom and more dispersed development across villages, should be reconsidered.
  - LUC response: The SA has assessed a number of Strategic Spatial Options, during the Local Plan preparation, as set out in detail in Appendix C, including a 'Dispersal – villages' option and a 'Public transport corridors' option, which both included smaller sites spread across rural centres, minor rural centres and villages. The previous SA Reports have set out the positive and negative effects associated with each option, and these are re-presented in Appendix C. Approximately 200 residential/mixed use reasonable alternative site options with a range of sizes have been subject to SA, as set out in Chapter 4. The Councils' justification for selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.

Mr Paul Seddon

- Queries what alternative options have been considered if there is a need for additional housing in the Abington area (the Grange Farm allocation). While acknowledging the general need for housing, the respondent indicates support for development that is appropriate and sensitive to local context.
  - LUC response: The SA has assessed a number of Strategic Spatial Options, during the Local Plan preparation, as set out in detail in Appendix C. The previous SA Reports have set out the positive and negative effects associated with each option, and these are re-presented in Appendix C. Approximately 200 residential/mixed use reasonable alternative site options with a range of sizes have been subject to SA, as set out in Chapter 4. The Councils' justification for selecting the spatial strategy and site allocations in the Local Plan is set out in Appendix E.

Camcycle

- Considers that the Sustainability Appraisal does not adequately reflect the transport-related carbon impacts of different spatial strategy choices and does not sufficiently distinguish between locations with varying potential for walking, cycling and public transport.
- Argues that the SA does not robustly compare the long-term transport emissions associated with dispersed, car-dependent development versus more compact, well-connected urban growth.

- Suggests that the SA does not test alternative scenarios that maximise opportunities for mode shift through land use, density, layout and connectivity, weakening the link between the Plan's spatial strategy and climate objectives.
  - LUC response: The SA has assessed a number of Strategic Spatial Options, during the Local Plan preparation, as set out in Chapter 4 and in Appendix C, including a Densification option and more dispersed development options. The SA sets out the positive and negative effects associated with each option in relation to all the SA objectives, including SA objective 12: Climate change mitigation, which includes appraisal questions to consider whether options:
    - SA 12.4: support the growth of public transport networks, modal shift away from private cars and onto public transport, and access to public transport options?
    - SA 12.5: create, maintain and enhance attractive and well- connected networks of public transport and active travel, including walking and cycling?
    - SA 12.6: support development which is in close proximity to city, district and rural centres, services and facilities, key employment areas and/or public transport nodes, thus reducing the need to travel by car?
  - The transport emissions that could arise from the different spatial options were considered in the assessment of the options against SA objective 12: Climate change mitigation.

Appendix B

Review of plans, policies and programmes and baseline information

B.1 This Appendix sets out a review of relevant plans, policies and programmes that provide context for the SA process. The Appendix also sets out updated baseline information for the plan area. The review has been undertaken to ensure that baseline information is included for various themes that relate to the 'SEA topics' (as listed in Schedule 2 of the SEA Regulations).

Population, Health and Wellbeing

Policy Context

International

B.2 Declaration on Forests and Land Use (COP26 Declaration) (2021) [See reference 2]: An international commitment to halt and reverse forest loss and land degradation by 2030, while delivering sustainable development and promoting an inclusive rural transformation.

B.3 The **2030 Agenda for Sustainable Development (2015) [See reference 3]**: This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 1: No Poverty
- SDG 2: Zero Hunger
- SDG 3: Good Health and Well-being
- SDG 4: Quality Education
- SDG 5: Gender Equality
- SDG 10: Reduced Inequalities
- SDG 11: Sustainable Cities and Communities

B.4 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) **[See reference 4]**: Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

B.5 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998) **[See reference 5]**: Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

National plans and programmes (beyond the NPPF) of most relevance to the Local Plan

B.6 Renters' Rights Act (2025) **[See reference 6]** aims to improve renters' security and rights. The Act delivers the government's manifesto commitment to transform the experience of private renting, including by ending Section 21 'no fault' evictions. The Act will improve the current system for both the 11 million private renters and 2.3 million landlords in England. It will give renters greater security and stability so they can stay in their homes for longer, build lives in their communities, and avoid the risk of homelessness.

B.7 Healthy Homes —a foundation for healthier and resilient communities (2025) **[See reference 7]** sets out core specification and good practice guidance to help support the delivery of healthier living environments. The guidance also covers neurodiversity, and the adoption of an 'age-friendly' design approach that supports residents and households to live independently throughout the different stages of their life. Beyond individual wellbeing, Healthy Homes support sustainability and affordability, helping to lower energy costs and reduce carbon emissions.

B.8 Planning Policy for Traveller Sites (2024) **[See reference 8]**: To be read in conjunction with the NPPF, this policy document sets out the Government's planning policy for Traveller sites to ensure fair and equal treatment for Travellers.

B.9 Levelling-up and Regeneration Act (2023) **[See reference 9]**: Sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-

generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.10 The Green Infrastructure Framework (2023) **[See reference** 10**]**: Will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future.

B.11 Anti-Social Behaviour Action Plan (2023) **[See reference** 11**]**: Sets out a comprehensive strategy to combat anti-social behaviour (ASB) and restore public confidence in community safety. The plan emphasises a zero-tolerance approach and introduces several key measures, including increasing the use of hotspot policing and enforcement, and changing laws and systems to take a zero-tolerance approach to anti-social behaviour.

B.12 The Homes England Strategic Plan 2023 to 2028 (2023) **[See reference** 12**]**: Sets out a vision to drive regeneration and housing delivery, to ensure that more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.13 A Fairer Private Rented Sector White Paper (2022) **[See reference** 13**]**: Aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

B.14 The Levelling Up the United Kingdom White Paper (2022) **[See reference** 14**]**: Sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.

- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

B.15 National Design Guide (2021) [See reference 15]: Sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

B.16 Build Back Better: Our Plan for Health and Social Care (2021) [See reference 16]: Sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the electives backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

B.17 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021) [See reference 17]: Sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

B.18 The Charter for Social Housing Residents: Social Housing White Paper (2020) [See reference 18]: Sets out the Government's actions to ensure residents in

social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

B.19 Planning for the Future White Paper (2020) [See reference 19]: Sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:

- Simplifying the role of Local Plans and the process of producing them.
- Digitising plan-making and development management processes.
- Focus on design, sustainability and infrastructure delivery.
- Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

B.20 Using the planning system to promote healthy weight environments [See reference 20] (2020), **Addendum (2021) [See reference 21]**: Provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

B.21 Public Health England, PHE Strategy 2020-25 (2019) [See reference 22]: Identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

B.22 Homes England Strategic Plan 2018 to 2023 (2018) [See reference 23]: Sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.23 A Green Future: Our 25 Year Plan to Improve the Environment (2018) [See reference 24]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. It identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:

a) Embed an 'environmental net gain' principle for development, including housing and infrastructure.

- Connecting people with the environment to improve health and wellbeing:

b) Help people improve their health and wellbeing by using green spaces including through mental health services.

c) Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.

d) 'Green' our towns and cities by creating green infrastructure and planting one million urban trees.

e) Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

B.24 The Housing White Paper (2017) (Fixing our broken housing market) **[See reference 25]**: Sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

B.25 Technical Housing Standards – Nationally Described Space Standard (2015) **[See reference 26]**: This document sets out the Government's new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

B.26 Select Committee on Public Service and Demographic Change Report: Ready for Ageing? (2013) **[See reference 27]**: Warns that society is underprepared

for the ageing population. The report states that “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boom could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.27 Fair Society, Healthy Lives (2011) **[See reference 28]**: Investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

B.28 Laying the foundations: a housing strategy for England (2011) **[See reference 29]**: Aims to provide support to deliver new homes and improve social mobility.

B.29 Healthy Lives, Healthy People: Our strategy for public health in England (2010) [See reference 30]: Sets out how the Government’s approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing, and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government’s core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a ‘ladder’ of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

B.30 The Environmental Noise Regulations (2006) **[See reference 31]**: Apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban

areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at work places; inside means of transport; or military activities in military areas.

Sub National

B.31 Homes for our future: Greater Cambridge Housing Strategy 2024-2029 (2024) [See reference 32]: Sets out the strategic direction for housing activity in Cambridge City and South Cambridgeshire District. Its purpose is to set the context as to how both councils aim to meet the housing challenges facing the area, setting out key priorities for action. These include:

- Increasing the delivery of homes, including affordable housing, along with sustainable transport and other infrastructure, to meet housing need.
- Diversifying the housing market & accelerating housing delivery.
- Achieving a high standard of design and quality of new homes and communities.
- Improving housing conditions and making best use of existing homes.
- Promoting health and wellbeing through housing.
- Preventing and tackling homelessness and rough sleeping.
- Working with key partners to innovate and maximise resources available.

B.32 Greater Cambridge Air Quality Strategy 2024 – 2029 (2024) [See reference 33]: Outlines how improvements to air quality will continue to be delivered across Greater Cambridge. The Strategy focuses on sources of pollution that can be influenced locally by all partner organisations, working across a range of disciplines which all either directly or indirectly offer improved air quality. The primary objectives of the Strategy are:

- Continue to meet and deliver all legislative and policy requirements associated with air quality.
- Continue to improve air quality across Greater Cambridge enhancing the health of those living, working and visiting Greater Cambridge.

- Work towards World Health Organization Air Quality Guideline annual averages as longer term targets with interim targets for delivery within the lifetime of the Strategy (5 years).

B.33 South Cambridgeshire Homelessness Strategy 2023-2028 (2023) [See reference 34]: Identifies four themes that need to be taken forward over the 5 year period: working closer with partner agencies to prevent homelessness; new private rent initiatives; access to information; and access to accommodation and support.

B.34 South Cambridgeshire Empty Homes Strategy 2022-2025 (2022) [See reference 35**]**: Aims to bring empty homes back into use. The Strategy looks to understand the impacts of long-term empty homes in the District and what measures the council can take in terms of bringing empty homes back into use.

B.35 Homelessness & Rough Sleeping Strategy 2021-2026 (2021) [See reference 36**]**: Confirms Cambridge City Council's commitment to preventing and relieving homelessness and rough sleeping, and how they will work with partners to meet the set objectives and priorities.

B.36 South Cambridgeshire New Build Housing Strategy 2020-2025 (2020) [See reference 37**]**: Sets out the reasons for, and context within which, South Cambridgeshire District Council will acquire or directly commission new build affordable homes to be owned and managed directly by the Council.

B.37 Greater Cambridge Sustainable Design and Construction SPD (2020) [See reference 38]: Produced to provide guidance on the policies within the adopted 2018 Cambridge and South Cambridgeshire Local Plans that relate to sustainability.

B.38 Cambridgeshire Strategy for Supporting New Communities (2015) [See reference 39]: Sets out three visions that provide the foundation to the strategy:

- Ensure that infrastructure in new communities is designed to meet the needs of the community now and in the future.
- Support the development of a self-supporting, healthy and resilient community by helping to build people's capacity to help themselves and others in order to create a good place to live, improve outcomes, support economic prosperity and make people less reliant on public services.
- Ensure that where people's needs are greater than can be met within community resources they are supported by the right services and are helped to return to independence.

B.39 Greater Cambridge Playing Pitch Strategy 2015-2031 (2015) [See reference 40]: Aims to provide accessible community sport and leisure facilities for swimming,

fitness and sports hall sports/activities for all residents. This includes both formal and informal spaces. An updated Playing Pitch Strategy is being prepared for the New Local Plan.

B.40 Greater Cambridge Indoor Sports Facility Strategy 2015-2031 (2015) [See reference 41]: The vision for future provision of sport and leisure facilities is: 'to enable opportunities for increased and more regular physical activity, particularly from those in areas of deprivation, and in new settlements, to improve community health and well-being, by facilitating provision of, and access to, a range of quality, accessible and sustainable facilities in Cambridge and South Cambridgeshire District'. An updated Indoor Sports Facility Strategy is being prepared for the New Local Plan.

B.41 Cambridge & South Cambridgeshire Infrastructure Delivery Study (2015) [See reference 42]: aims to assess the infrastructure requirements, costs and known funding relating to planned growth, particularly the strategic sites, and identify any phasing issues that might affect the proposed growth and advice on the future delivery of infrastructure needed to support the planned growth. An updated Infrastructure Delivery Plan is being prepared for the New Local Plan.

B.42 Cambridge Affordable Housing SPD (2014) [See reference 43]: This SPD will help all parties involved (such as the council, developers, landowners and registered providers) deliver affordable housing through new development. The SPD seeks to provide greater clarity and certainty, particularly in terms of:

- the planning process leading to submission of a planning application;
- when the policy applies;
- the specification sought;
- the type/mix required.

B.43 South Cambridgeshire Services and Facilities Study (2014) [See reference 44]: Aims to collate services and facilities data for all settlements within the district to provide and document an evidence base for the review of the settlement hierarchy and for future community/neighbourhood planning.

B.44 South Cambridgeshire Recreation and Open Space Study (2013) [See reference 45]: Provides an audit of the quantity and quality of existing provision in the district and assesses the need for future provision. An updated open space study is currently being prepared.

B.45 Cambridge & South Cambridgeshire Sustainable Development Strategy (2012) [See reference 46]: Reviews what sustainable development means in the

context of Cambridge and South Cambridgeshire and to ensure that the sustainability of different broad spatial options for locating new developments are assessed.

B.46 Cambridgeshire Green Infrastructure Strategy (2011) [See reference 47]: Outlines how the broader historic environment makes an important contribution to sense of places, sense of time and local identity and distinctiveness. The challenges highlighted including the impact of farming, the impact of climate change and development, lack of visibility of some assets, and conflicts between conservation and public access. An updated Green Infrastructure Strategy is currently being prepared.

B.47 Cambridge Open Space and Recreation Strategy (2011) [See reference 48]: Discusses the findings of the Open Space and Recreation Assessment. It breaks the information down by ward and provides data on the deficits in each ward and the ward's strengths and weaknesses in terms of open space provision. It also discusses the level of provision proposed in the urban extensions to the City, which have not been assessed in this Strategy, as they have not yet been delivered on site. An updated open space strategy is currently being prepared.

B.48 Air Quality Action Plan for the Cambridgeshire Growth Areas (2009) [See reference 49]: Reviewed all existing air quality information across the regions, identified the key causes in each management area and assessed the necessary actions needed to improve pollutant levels in those areas.

B.49 Cambridge City Council Contaminated Land Strategy (2009) [See reference 50]: Builds on the City Council's Medium Term Objectives which include:

- To promote Cambridge as a sustainable city, in particular by reducing carbon dioxide emissions and the amount of waste going into landfill in the City and sub-region.
- Ensure that residents and other service users have an entirely positive experience of dealing with the Council.
- Maintain a healthy, safe and enjoyable city for all, with thriving and viable neighbourhood.
- Lead the growth of Cambridge to achieve attractive, sustainable new neighbourhoods, including affordable housing, close to a good range of facilities, and supported by transport networks so that people can opt not to use the car.

B.50 South Cambridgeshire Contaminated Land Strategy (2001) [See reference 51]: Sets out South Cambridgeshire District Council's strategy on how it proposes to identify contaminated land within its boundaries. It supports the following objectives:

- Maintaining, improving and developing sympathetically the character, environment, economy and social fabric of our villages.
- Promoting a healthier environment to enable our communities to lead healthier lives, by its own actions and active partnership with others.
- Working towards a more sustainable future for everyone living and working in South Cambridgeshire, balancing the needs of the present and future generations.

Current Baseline

B.51 Greater Cambridge consists of Cambridge City and South Cambridgeshire District. Cambridge covers an area of approximately 4,070 hectares and is located on the River Cam about 60 miles north-east of London. Cambridge has a population density of 3,579 persons per square kilometre **[See reference** 52**]**, significantly higher than that of the rest of the county which has an average density of around 276 persons per square kilometre. The Authority Monitoring Report for Greater Cambridge highlights the area's wider strategic role, noting that Greater Cambridge's built and natural environmental characteristics "underpin Greater Cambridge's role as a major driver of 'UK plc'" **[See reference 53]**.

B.52 South Cambridgeshire covers an area of 90,163 hectares and has a population density of 180 persons per square kilometre, below the county's average **[See reference 54]**. South Cambridgeshire is located centrally in the East of England region at the junction of the M11/A14 roads and with direct rail access to London and to Stansted Airport. South Cambridgeshire is a largely rural district which surrounds the city of Cambridge and comprises over 100 villages, none currently larger than 8,000 persons. It is surrounded by a ring of market towns just beyond its borders, which are generally 10-15 miles from Cambridge **[See reference 55]**.

B.53 The 2021 Census demonstrates that ethnic minorities constituted around 25.5% of the total population of Cambridge. People of Asian, Asian British or Asian Welsh ethnicity were the largest group in the city (14.8%) next to those of White ethnicity (74.5%), followed by Mixed or Multiple ethnic groups (5.1%) and those of Black, Black British, Black Welsh, Caribbean or African ethnicity (2.4%) **[See reference 56]**.

B.54 2021 population estimates put the population of Cambridge at 145,700 **[See reference 57]** and South Cambridgeshire at 148,800 **[See reference 58]**. For Cambridge, this is an increase of 17.6%, from just under 123,900 in 2011. This means Cambridge's population saw the largest percentage increase in the East of England between 2011 and 2021 **[See reference** 59**]**. The demographic profile is also changing, with the proportion of those aged over 65 significantly increasing, especially within South Cambridgeshire. At the other end of the spectrum, Cambridge has one of the 'youngest' populations in the country. People aged 24 and under, including students, make up around 35% of the City's population **[See reference 60]**.

B.55 In 2024/25, 24,912 people (12,910 undergraduates and 12,010 postgraduates) studied at the University of Cambridge in comparison to 24,270 in 2020/21**[See reference** 61**]**. Anglia Ruskin University has also seen an increase in its student population, from to 32,180 in 2020/21 to 34,370 in 2024/25 **[See reference** 62**]**.

B.56 Residents of Cambridge City have a notably younger average age than more rural parts of the plan area **[See reference** 63**]**. The average age of people in South Cambridgeshire is 42, compared to Cambridge where the average age is 31 **[See reference 64]**. However, as the population of the county increases, so will the number of older people. The old age dependency ratio, defined as the number of people of state pension age per 1,000 people of working age (from 16 years up to state pension age) is expected to increase countywide between 2025 and 2047. Across Cambridgeshire, there were 279 people of state pension age per 1,000 people of working age in 2025. In 2047, it is predicted that this number will increase by 10.7% to 308.9 people of state pension age per 1,000 people of working age **[See reference** 65**]**. There are notable variations across the districts, with the greatest predicted increase in Cambridge at 21.3%.

B.57 Over the period 2025 to 2047, the population of South Cambridgeshire is projected to increase by 17.4%, to 202,943, whilst the population of Cambridge City is projected to increase by 9.3%, to 17,4306. This increase is much smaller than the projected County increase of 13.2% **[See reference** 66**]**.

Housing

B.58 Sustained population and employment growth has led to a housing shortage within Cambridge, with high house prices and low levels of housing affordability. Cambridge is frequently ranked as one of the most unaffordable places to live within the UK.

B.59 According to ONS housing price data, the average house price in Cambridge City was £472,000 in March 2026, which is down 2.2% from March 2025. The

average house price in South Cambridgeshire was £430,000 in March 2026, which is similar to the figure for March 2025. This is a similar magnitude of change to East England overall **[See reference** 67**]**.

B.60 Latest Hometrack data **[See reference** 68**]** shows that median sale prices remain highest in Cambridge and South Cambridgeshire. Cambridge recorded the highest median price at £493,750, followed by South Cambridgeshire at £400,000. Both remain above the East of England median of £342,500 and above the other districts reported in the Housing Market Bulletin, although South Cambridgeshire's median price has fallen from £463,000 in September 2024. Across the wider market area, median prices in September 2025 ranged from £225,500 in Fenland to £493,750 in Cambridge.

B.61 The availability of housing that is affordable and accessible to those in need in Greater Cambridge remains a major issue. Cambridge and South Cambridgeshire stand out in the East of England as areas with particularly constrained affordability. Collectively, the two adopted Local Plans identify the need for 33,500 new homes across Greater Cambridge between 2011 and 2031, comprising 19,500 homes in South Cambridgeshire and 14,000 homes in Cambridge. Latest monitoring indicates that housing affordability remains challenging: in Cambridge, the median house price was 10.9 times the median income in 2024, compared with 8.7 in 2011; in South Cambridgeshire, the ratio was 9.6 in 2024, compared with 7.6 in 2011 **[See reference** 69**]**. In Cambridge, the median house price was 11.3 times the median income of those working in the area in 2024. In South Cambridgeshire, the figure was 9.5 and the national figure was 7.7 **[See reference** 70**]**. Although there has been some recent improvement in Cambridge, affordability remains significantly worse than at the start of the plan period **[See reference** 71**]**. In addition, although the level of new market supply is high it is not well aligned with local incomes, with most homes only affordable for those with incomes of £41,000 or more **[See reference 72]**.

B.62 Regarding affordable housing, Cambridge has an estimated annual net need of 314 affordable homes, accounting for 48% of the total housing need. In South Cambridgeshire, the annual net need is 435 affordable homes, making up 40% of the total housing need between 2020 and 2040 **[See reference** 73**]**. In 2024–2025, 424 net affordable dwellings were completed in South Cambridgeshire, representing 24% of all net dwellings completed in the district. Half of these affordable housing completions were delivered across three strategic sites: Northstowe, Marleigh and Cambourne West. In Cambridge, 263 net affordable dwellings were completed, a significant increase from the previous year, when only 20 affordable dwellings were completed. Affordable housing accounted for around half of all dwellings completed

in Cambridge in 2024–2025, the second highest proportion achieved during the plan period **[See reference** 74**]**.

B.63 In terms of permissions, 9,900 dwellings were granted permission in South Cambridgeshire during 2024–2025, including 9,627 dwellings on schemes eligible to provide affordable housing. Of these, 35% are expected to be affordable dwellings, slightly below the policy requirement of 40%, largely reflecting viability considerations and site-specific affordable housing requirements on major schemes. In Cambridge, 746 dwellings were granted permission during the same period. Of the six permitted schemes of 15 or more dwellings, where the 40% affordable housing requirement applies, 52% of dwellings are expected to be affordable, which is above the policy requirement **[See reference** 75**]**.

B.64 The housing trajectory for both Cambridge and South Cambridgeshire was considered in the preparation of the adopted Local Plans and is shown below:

Table B.1: Distribution of housing across the development sequence in the Local Plan [See reference 76] [See reference 77]

Location	Existing Completions and Commitments (both areas)	New Sites Cambridge	New Sites South Cambridgeshire	Total	%
Cambridge Urban Area	5,358	1,470	0	6,282	19
Edge of Cambridge	11,370	890	410	12,670	35
New settlements and Cambourne West	3,445	0	4,610	8,055	23
Rural Area (including windfalls)	7,284	0	936	8,220	23
Total	27,457	2,360	5,956	35,773	100

B.65 The development strategy identified in the Local Plans includes development at all stages in the sequence across both areas. The strategy has 35% of all new

development planned on the edge of Cambridge and 23% of new settlements within South Cambridgeshire.

B.66 The Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2026) **[See reference** 78**]** estimates that 13,842 dwellings will be delivered in Cambridge between 2011 and 2031. This falls slightly short of the 14,000 dwellings required by Policy 3 of the Cambridge Local Plan 2018, equivalent to an annualised average of 700 dwellings per year. Housing delivery exceeded the annualised target in several earlier years of the plan period, including from 2013/14 to 2018/19. However, delivery has been below the annualised target in more recent years, including 2019/20, 2020/21, 2021/22, 2023/24 and 2024/25, with 513 dwellings completed in 2024/25 and 338 dwellings predicted for 2025/26. Although the adopted Cambridge Local Plan housing requirement is not expected to be fully met by 2031, the Councils are preparing a new Greater Cambridge Local Plan, which will consider the appropriate level of housing need, the distribution of development and the specific sites needed to deliver new homes.

B.67 The Greater Cambridge Housing Trajectory and Housing Land Supply Report (April 2026) **[See reference** 79**]** expects 24,257 dwellings to be delivered in South Cambridgeshire between 2011 and 2031, exceeding the 19,500 dwellings required by Policy S/5 of the South Cambridgeshire Local Plan 2018. The Local Plan anticipates that the majority of these new homes to be delivered through urban extensions of Cambridge and Cambourne, or the creation of new developments proposed at Bourn Airfield, and two new towns at Northstowe and Waterbeach. The first families moved into Northstowe in May 2017, and the development has continued to grow at a steady pace since then, with approximately 3,000 residents as of 2024 **[See reference** 80**]**. There has also been increased pressure as a result of demographic change. These pressures are a result of an increase in the birth rate seen in previous years. In addition, there are clear patterns of inward migration into a number of villages, with many family houses becoming available as older homeowners begin to downsize **[See reference** 81**]**.

B.68 The increase in housing need and the influence of potential water supply constraints and solutions on various stages of the plan period have implications for housing delivery. The Councils therefore commissioned their consultants to consider the housing delivery implications of the increased housing need, and this has been published as an Addendum (2022) to the earlier Housing Delivery Study (2021) and Interim Findings (2020).

B.69 The Housing Delivery Study (2021) found that the 2021 medium+ growth level that was included in the Greater Cambridge Local Plan: First Proposals as the objectively assessed need was deliverable. The assessment of the increased

housing need (2022 medium growth level) is included in the Addendum (2022). It concludes that this new increased housing need would result in a material increase in annual housing completions from the First Proposals objectively assessed need and that it will require significant new sources of supply over and above the additional allocations proposed in the First Proposals. It therefore recommends that additional testing of spatial options (baskets of sites) is required to estimate at what level the housing requirement becomes unachievable. It also advises that a stepped housing requirement would be needed to allow time for:

- additional sites to be allocated, permitted and delivered through the new Greater Cambridge Local Plan, and
- necessary infrastructure to be developed, not least new water supply solutions in the medium to long term.

B.70 These two factors are likely to increase the annual level of housing completions that can be achieved in the middle and latter stages of the plan period. However, the assessment also highlights that:

- a diverse housing supply that is flexible to changing circumstances and less reliant on a smaller, more concentrated basket of sites is required to maximise market absorption, and
- a housing land supply that is more geographically spread would help to reduce competition, thus better matching the housing supply with demand, but that this brings its own challenges in terms of infrastructure delivery and sustainability, including climate change.

B.71 Oxford and Cambridge colleges collectively own more land than the Church of England and have a portfolio of properties across the UK worth £3.5 billion and amount to 51,000 hectares – an area more than four times the size of Manchester. The two major Cambridge landowners are St. John's and Trinity Colleges, which have 10,500 hectares worth £1.1 billion and make up more than half of the 17,000 hectares owned by Cambridge colleges **[See reference 82]**. A significant proportion of land within the city centre, including residential properties, is owned and operated by the University colleges, much of it as student accommodation.

B.72 There are an estimated 46,132 students in Cambridge with a need for some form of accommodation. Of these, 22,410 are housed in purpose built student accommodation (PBSA), an estimated 9,157 are in shared housing, 12,129 are in existing family housing and there is no information for 2,436 students. 91% of undergraduates and 55% of postgraduates at the University of Cambridge are in University or College maintained accommodation, compared to 11% of undergraduates and 15% of postgraduates at Anglia Ruskin University. Anglia

Ruskin University is therefore currently dependent upon housing 4,285 undergraduates and 785 postgraduates in shared housing, a total of 5,070 students, occupying at least 1,000 shared houses, assuming an average of five students to each shared house. The University of Cambridge's current planning framework envisages an expansion in undergraduate numbers of 0.5% per year for the next ten years, and in postgraduate numbers of 2% per year. A total of 8,959 student rooms would need to be built in PBSA, for both universities, by 2026 if both the current and the future potential levels of student accommodation were to be met. If PBSA is not available to meet future growth, then by 2026, between 656 (based on 5 students per shared house) and 821 (based on 3.5 students per shared house) additional existing houses would need to be converted into shared student accommodation in order to meet demand **[See reference 83]**.

B.73 There was a net increase of 4,937 student rooms over the first fourteen years of the plan period from 2011 to 2025 in Greater Cambridge. There were six permissions related to student accommodation granted in 2024–2025, resulting in a net increase of 316 student bedrooms. The most significant permission was for postgraduate accommodation at Fossdene, Whinside, The Gables and The Knott, which will provide an additional 133 student bedrooms. A certificate of lawfulness for the use of the former Cambridge Care Home as student accommodation will provide a further 91 student bedrooms **[See reference** 84**]**.

B.74 In terms of completions in 2024–2025, there were three schemes contributing 141 net student bedrooms. The main positive contributors were the former Cambridge Care Home scheme and the expansion of Pembroke College, a mixed-use scheme including 94 student bedrooms. The redevelopment of Fossdene, Whinside and The Gables resulted in the loss of 44 student bedrooms in 2024–2025, although these are expected to be more than compensated for as the development is completed in future years. **[See reference** 85**]**.

B.75 Between April 2024 and March 2025, Cambridge recorded 2,492 cases of people seeking council advice relating to housing stress, representing an increase of around 9% from the previous year and 28% compared with five years earlier. From October 2024 to March 2025, there were 538 homelessness applications where applicants were initially assessed as being owed a statutory homelessness duty. Across April 2024 to March 2025, 1,139 such homelessness applications were received, a 13% increase on the previous April–March period. The 2024 annual autumn street count identified 23 individuals sleeping rough, down by one compared with the 2023 count **[See reference** 86**]**.

B.76 In South Cambridgeshire, levels of rough sleeping remain low but have recently increased, mirroring national trends. Between December 2019 and August 2022, 55

referrals were made to P3, a charity supporting rough sleepers in South Cambridgeshire. Additionally, as of March 2023, there were a total of 1,738 applications on the housing register. The highest proportion of these were single people **[See reference 87]**.

Gypsy and Travelling Showpeople

B.77 The South Cambridgeshire District and Cambridge City Councils Accommodation Needs Assessment (ANA) of Gypsies, Travellers, Travelling Showpeople, Bargee Travellers and other caravan and houseboat dwellers **[See reference** 88**]** identified that, as of March 2024, across South Cambridgeshire District there was a total of 65 Gypsy and Traveller sites with 390 pitches. Of these 283 pitches were occupied by 288 Gypsy and Traveller households, 70 pitches were occupied by non-Gypsy and Traveller householders based on site observation and responses, and 37 pitches were vacant. In relation to Cambridge, no households were observed living on pitches.

B.78 Cambridgeshire has one of the largest Traveller populations in the country **[See reference** 89**]**. South Cambridgeshire had a total of 602 traveller caravans in January 2024 **[See reference** 90]. Compared to 2016, with a total of 433, this is an increase of 39% **[See reference 91]**. Gypsies and Travellers were identified separately for the first time in the 2011 Census. The 2011 Census identified just under 500 people (0.3% of the population) in South Cambridgeshire as Gypsies and Travellers. However, this may not give a true reflection of the actual Gypsy and Traveller community in the district, which was previously estimated to be 1.0% by the Cambridge Sub-Region Traveller Needs Assessment. The 2021 Census reported a population of 450 people who identified as ‘White: Gypsy or Irish Traveller’, 175 people who identified as ‘White: Roma’ and three people who identified as ‘Other ethnic group: Gypsy/Romany’ living in South Cambridgeshire District.

B.79 The South Cambridgeshire District and Cambridge City Councils ANA identifies, in relation to South Cambridgeshire, a need for 41 additional pitches from 2023/24 to 2027/28, with a further 89 needed from 2028/29 to 2040/41, totalling a net shortfall of 130 pitches (7.2 per year) **[See reference** 92**]**. This is based on needs analysis of the needs arising from existing households, households on unauthorised sites, newly forming households, immigrant households and current vacancies on existing public and private sites. Household formation and net in-migration are key drivers of future need. The assessment notes that the Council could consider the regularisation of 16 pitches which are not permanently authorities, and additional pitch provision through intensifying or expanding existing sites, to help meet its need for pitches. There is a potential supply of between 77 and 92 additional pitches through regularisation of unauthorised pitches, intensification and expansion of existing sites, and from

household dissolution. This has the potential to meet the minimum identified short-term need and help to meet longer-term needs to 2040/41. In addition, there are 70 pitches where the occupier is presumed to not be a Gypsy or Traveller.

B.80 In relation to Cambridge, there is a modelled need for two additional pitches which may arise from households living in bricks and mortar accommodation. This is based on national estimates of 5.3% of households living in bricks and mortar preferring to live on sites. However, there are currently no sites in Cambridge and no specific households were identified through the ANA who needed a site. Given the Council's duty to address local needs, a minimum of 17 plots is recommended, and the new Local Plan should include a criteria-based policy to guide future site applications **[See reference** 93**]**.

Education

B.81 Cambridgeshire is facing a period of significant housing growth with the prospect of around 48,000 new homes planned in total across its five districts by 2031. This means there continues to be high demand for education places **[See reference** 94**]**.

B.82 The City of Cambridge is home to the University of Cambridge (which is made up of 31 colleges)and Anglia Ruskin University. It is also home to a branch of the Open University. Language schools also make an important contribution to the city's economy. There are 22 accredited schools in the Cambridge area employing over 300 staff. Fees and accommodation generate around £50 million per annum and spend in the local area is thought to exceed £78 million per annum **[See reference 95]**. There are currently 210 primary schools in Cambridgeshire, with the largest proportion of these now operating as academies, and 33 secondary schools. In addition, there is one University Technical College (UTC) which serves students aged 13-19 years.

B.83 Cambridge City is expected to see increases in both primary and secondary school pupils over the next five and ten years. In 2023, the city experienced a net rise in enrolments across both sectors, continuing a three-year trend driven by large primary school cohorts moving into secondary education. The Year 7 intake for 2023/24 is projected to be the highest in the foreseeable future, with enrolments expected to remain near capacity in the coming years as secondary school numbers continue to grow. There is particular pressure on school places in the north of the city **[See reference** 96**]**. In South Cambridgeshire, primary schools may expect decreases in pupil numbers over the next five years but an overall increase over the next ten years. In contrast secondary schools may expect increases over the next

five and ten years. The District experienced a net cohort gain in primary numbers but a net cohort loss in secondary number in 2015/16 **[See reference 97]**.

B.84 To cope with primary school capacity pressure, a 420-place primary school, Marleigh Primary Academy, opened in Cambridge in September 2022. The school was approved through Wave 12 of the Free School Programme. It includes a 52-place nursery for 3-and 4-year-olds. The Council has also recently launched a free school presumption under the Education Act 2011 to identify a sponsor to run a new 420-place primary school on the Darwin Green development, in the northwest fringe of the city. The school is scheduled to open in September 2025, and the deadline for applications to run the new school has now passed (14 October 2022). In South Cambridgeshire, an expansion of Waterbeach Community Primary School was completed in 2020 in response to housing development within the village. The school now has a capacity of 630 places. Histon and Impington Infant and Junior Schools were also redeveloped to enable them to extend their age ranges to operate as all-through primary schools and in January 2020, the Infant school relocated to a new site at Buxhall Farm. The former Infant School is known as Histon & Impington Park Primary and the former Junior School as Histon & Impington Brook Primary. Furthermore, an expansion of Bassingbourn Primary School was completed in 2020 in response to the decision by the Ministry of Defence to re-open Bassingbourn Barracks. The school now has a capacity of 420 places **[See reference** 98**]**.

B.85 To cope with secondary school capacity pressure, an expansion of Cambourne Village College was completed in January 2020 in South Cambridgeshire. This provides a further 300 places to meet the demand from within its catchment area **[See reference** 99**]**.

B.86 With respect to the local population, of the 104,059 people aged 16-64 in the District of South Cambridgeshire in 2024, approximately 96.1% have NVQ1 qualifications, 94.6% have NVQ2 qualifications, 79% have NVQ3 qualifications and 68.3% have NVQ4 qualifications and above. For NVQ4 qualifications and above, this figure is higher than the regional average (44.2%) and the national average (48.6%) **[See reference 100]**. Of the 110,147 residents aged 16-64 over in the City of Cambridge in 2024, 93.9% have NVQ1 qualifications, 93.1% have NVQ2 qualifications, 75.9% have NVQ3 qualifications and 55.2% have NVQ4 qualifications and above. Like South Cambridgeshire, the percentage of people with NVQ4 qualifications is above the regional average and the national average **[See reference 101]**. Overall, within the County, 71% of children are achieving a good level of development at early years **[See reference 102]**.

Deprivation

B.87 Figure B.1 shows how the Indices of Multiple Deprivation (IMD) vary across the plan area. According to the Index of Multiple Deprivation 2019 (IMD 2019) **[See reference 103]**, Cambridge City is ranked as the third most deprived district of the five districts across Cambridgeshire for overall Indices of Multiple Deprivation (IMD Score). In general, the north-east of the district is the most deprived. LSOAs Cambridge 006D and 006F (Abbey), and Cambridge 001C (King's Hedges) have the most deprivation present in the district on the local IMD deciles (1 & 2). In comparison, Cambridge 005A (Castle), Cambridge 0011A & 011F (Cherry Hinton), and Cambridge 013D & 013E (Queen Edith's) rank the highest on the local IMD deciles (10). Cambridgeshire as a whole has more LSOAs in the less deprived deciles (6-10) than in 2015, however one LSOA in Cambridge City has become more deprived over this time period, 001C, Kings Hedges. Cambridge City is ranked 210/317 of all local authorities nationally, meaning that Cambridge City is the 107th deprived of the 317 English Local Authorities.

B.88 South Cambridgeshire is ranked as the least deprived of the five districts across Cambridgeshire and Peterborough for the overall Indices of Multiple Deprivation (IMD Score) **[See reference 104]**. In general, the north-east and south-west of the district is the most deprived. LSOAs 091A (Melbourn) and 007B (Milton & Waterbeach) are scored as having the most overall levels of relative deprivation in the district on the local IMD deciles 2 & 3). In comparison, South Cambridgeshire has 33 LSOAs in the 10th decile (the least deprived). Three LSOAs have in South Cambridgeshire have become more relatively deprived by two decile ranks since 2015, whereas 2 LSOAs have become relatively less deprived by two decile ranks since 2015.

B.89 In 2023, it was estimated that 9.2% (5,051) of households in Cambridge were classed as being fuel poor **[See reference 105]**. In contrast, 8.4% (5,849) were classed as being fuel poor in 2023 within South Cambridgeshire. These figures are reflective of household income, household energy requirements and fuel prices in a given area.

Health

B.90 Health is a cross-cutting topic and as such many topic areas explored in this Sustainability Appraisal influence health either directly or indirectly. Whilst this section focuses on direct indicators of health, the main report sets out the links between other topics and health.

B.91 Figure B.2 shows how the Indices of Health Deprivation (IHD) vary across the plan area. In 2021, 50.7% of Cambridge residents described their health as "very

good", increasing from 49.2% in 2011. Those describing their health as "good" fell from 33.5% to 33.2%. The proportion of Cambridge residents describing their health as "very bad" remained 1.0%, while those describing their health as "bad" fell from 3.8% to 3.3% **[See reference** 106**]**.

B.92 Regarding disability in Cambridge, in 2021, 6.2% of Cambridge residents were identified as being disabled and limited a lot. This figure decreased from 7.3% in 2011. In 2021, just over 1 in 10 people (10.5%) were identified as being disabled and limited a little, compared with 9.6% in 2011. Over the same period, the proportion of Cambridge residents who were not disabled increased from 83.0% to 83.3%. The decrease in the proportion of residents who were identified as being disabled and limited a lot in Cambridge (1.1%) was similar to the decrease across the East of England (1.2%, from 7.8% to 6.6%). Across England, the proportion fell by 1.6%, from 9.1% to 7.5% **[See reference** 107**]**.

B.93 With regard to South Cambridgeshire, in 2021, 51.9% of South Cambridgeshire residents described their health as "very good", increasing from 50.8% in 2011. Those describing their health as "good" fell from 34.4% to 34.0%. The proportion of South Cambridgeshire residents describing their health as "very bad" was 0.8% (similar to 2011), while those describing their health as "bad" was 2.6% (similar to 2011) **[See reference** 108**]**.

B.94 Regarding disability in South Cambridge, in 2021, 5.1% of South Cambridgeshire residents were identified as being disabled and limited a lot. This figure decreased from 6.0% in 2011. In 2021, just under 1 in 10 people (9.7%) were identified as being disabled and limited a little, compared with 9.0% in 2011. Over the same period, the proportion of South Cambridgeshire residents who were not disabled increased from 85.0% to 85.2%. The decrease in the proportion of residents who were identified as being disabled and limited a lot in South Cambridgeshire (0.9%) was similar to the decrease across the East of England (1.2%, from 7.8% to 6.6%). Across England, the proportion fell by 1.6%, from 9.1% to 7.5% **[See reference** 109**]**.

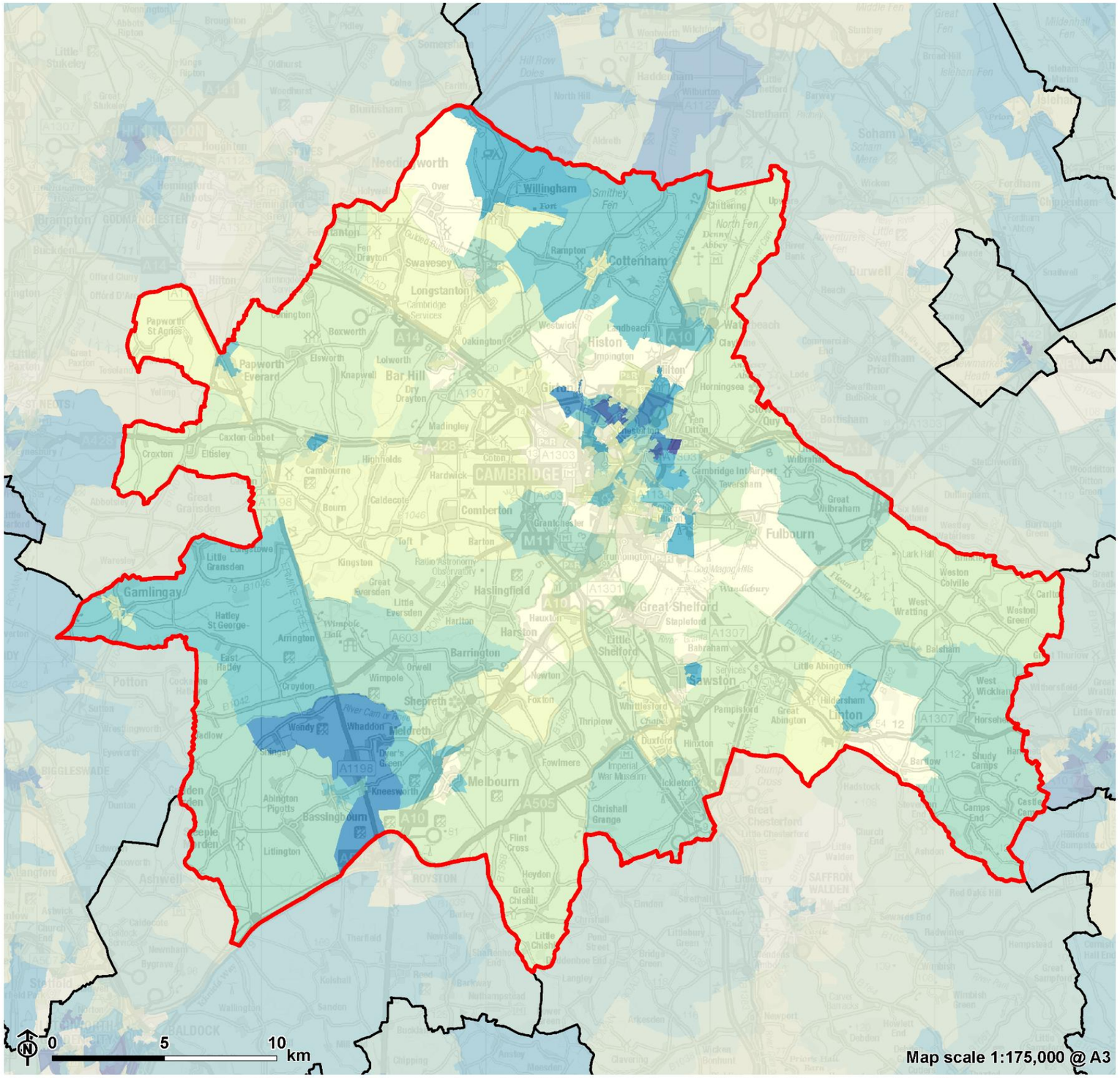
B.95 The health of people in Cambridge is varied compared to the England average. About 10.7% (2,266) children live in low income families. Life expectancy for men and women in 2025 was higher than the England average. For males, life expectancy at birth was 80.6 years, and for females it is 84.0 years. Life expectancy at birth has decreased slightly for both groups in recent years following a steady increase from 2003. This is in contrast to the recent increase in life expectancy at birth reported at the England level **[See reference** 110**]**.

B.96 Males born in the least deprived areas of Cambridge can expect to live twelve years longer than those born in the most deprived areas (females 11.8 years).

Inequalities in life expectancy at 65 shows a similar pattern, with Cambridge experiencing the greatest inequality linked to deprivation in Cambridgeshire. At age 65, men in the most deprived areas of Cambridge have a life expectancy of 10.1 years less than men in the least deprived areas (for women, 9.5 years) **[See reference 111]**.

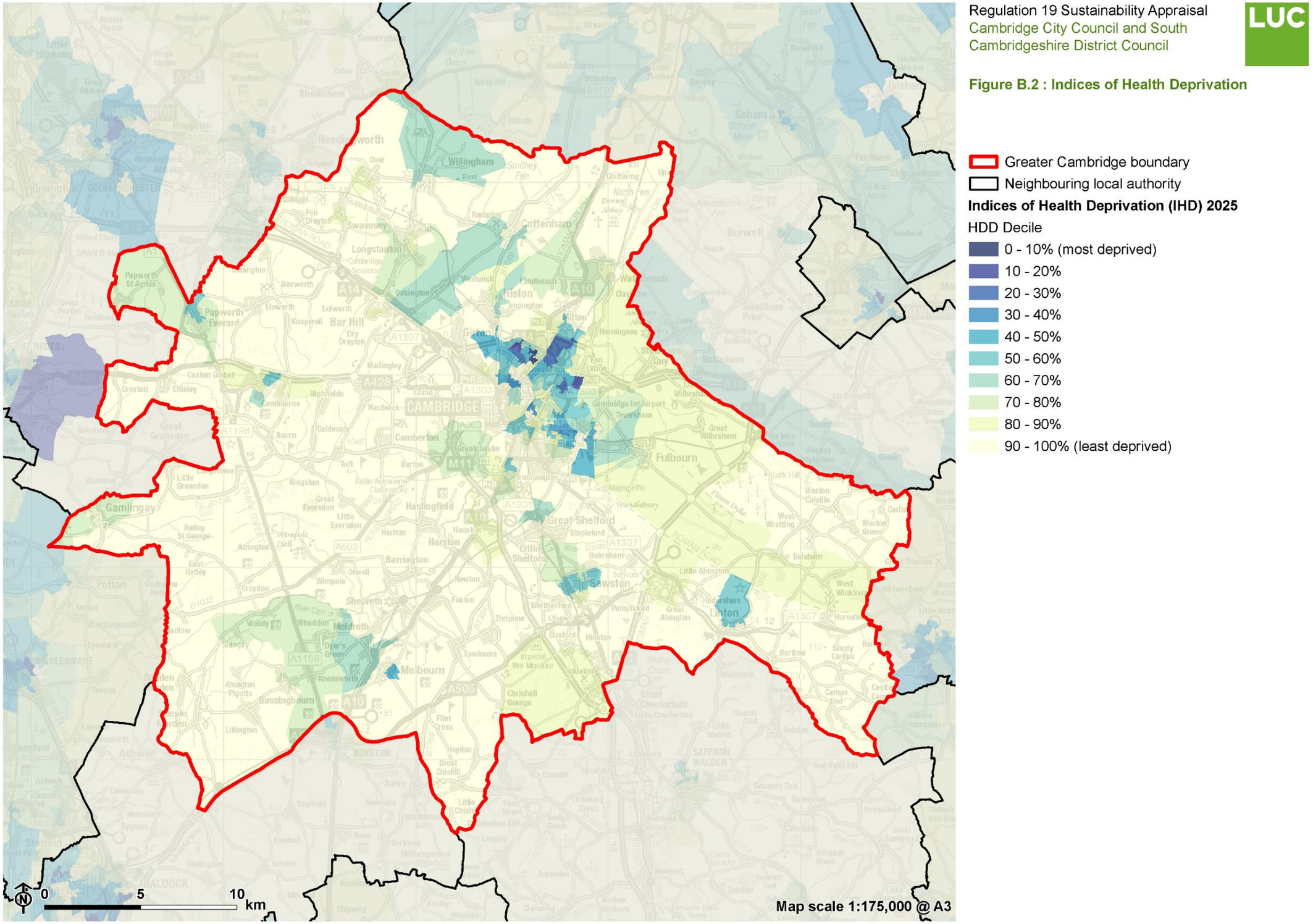
B.97 The health of people in South Cambridgeshire is similarly varied compared with the England average. South Cambridgeshire is one of the 20% least deprived districts/unitary authorities in England, however about 7.6% (2,480) children live in low income families. Life expectancy for both men and women is higher than the England average **[See reference** 112**]**. Average life expectancy at birth within South Cambridgeshire was above the national average in 2023, 82.5 for males and 85.4 for females. There has been a slight decrease in life expectancy at birth in recent years in South Cambridgeshire following a steady rise from 2003. Life expectancy is not significantly different for people in the most deprived areas of South Cambridgeshire than in the least deprived areas. **[See reference 113]**.

Figure B.1: Indices of Multiple Deprivation



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Figure B.2: Health deprivation across Greater Cambridge



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Open spaces, sports and recreation

B.98 There is a total of 217.6 hectares of informal open space across the South Cambridgeshire District. However, the availability of informal play space in housing areas varies greatly across the District. Some 50 villages lack any kind of informal play space provision, and the majority of villages fall short of meeting the existing standard of 0.4 hectares per 1,000 population.

B.99 The current standard for outdoor sport is 1.6 hectares per 1,000 population. Some 53% of the villages within South Cambridgeshire fail to meet this standard. Some 28 villages have no formal outdoor sport provision at all. South Cambridgeshire District Council's Recreation and Open Space Study (2013) shows that new developments such as Cambourne and Highfields Caldecote have significantly increased provision. The total number of additional hectares has increased from 198 hectares in 2005 to 225 hectares in 2013, a total of 27 additional hectares. The overall ratio per 1,000 population has remained relatively constant at 1.52 hectares, due to increases in population. An assessment of the quality of outdoor sports was carried out and the average score for quality was 65%. These included individual scores for bowls greens, grass pitches, all weather pitches and formal multi use games and tennis court areas **[See reference** 114**]**.

B.100 The majority of the playing pitches in South Cambridgeshire are provided and maintained by Parish Councils, and many sites have the dual role of providing invaluable green space within the villages in the District.

B.101 Overall, Cambridge City and South Cambridgeshire District have a good range of existing sport and leisure facilities across the area; however, some are now ageing i.e. Melbourn, Impington, Frank Lee, along with Abbey & Parkside Pools and Kelsey Kerridge, and will require large scale investment and/or replacement in future years **[See reference 115]**.

B.102 Based on local context and the supply and demand analysis undertaken in the Indoor Sports Facilities Strategy (2016), there is a need to consider additional provision of sports halls, swimming pools and fitness suites across Cambridge and South Cambridgeshire District, as well provision of some other facilities, to meet future demand as a result of population growth. Also, there are some existing facilities in Cambridge to which community access cannot be gained, due to planning conditions **[See reference 116]**.

B.103 The standards set by the National Society of Allotment and Leisure Gardeners recommend that there should be 20 allotment plots per 1,000 households and the

1969 Thorpe report recommends provision of 0.2 hectares per 1,000 population or a minimum of 15 plots per 1,000 households. This would equate to a total provision of 28.68 hectares for South Cambridgeshire. The 2013 study shows that 85.41 hectares are available, which is 56.33 hectares in excess of the area based on recommended provision **[See reference 117]**.

B.104 Across Cambridge City, there are some 743.59 hectares of Protected Open Space on 305 sites, of which 348.35 hectares on 163 sites are publicly accessible. Overall, this equates to approximately 6.2 hectares of Protected Open Space per 1,000 people based on mid-2009 population estimates, of which 2.9 hectares per 1,000 people is publicly accessible. Open spaces are not evenly distributed, with many suburbs experiencing a relative scarcity of open space in comparison with the city centre and the west of the city **[See reference** 118**]**.

B.105 Cambridge City Council manages more than 80 parks and playgrounds. There are around 30 large parks, commons and recreation grounds around the city. Some of the largest of these include Cherry Hinton Hall Park, Coldham's Common, Jesus Green and Lammas Land. The Council have installed play equipment for younger children at more than 50 small playgrounds in residential areas, as well as on some recreation grounds.

B.106 Within the city, Protected Open Spaces have been sub-divided into categories, given their main purpose. Table B.2 sets out the amounts of each typology of open space **[See reference 119]**.

Table B.2: Primary Function of open spaces in Cambridge City

Typology	Sites	Total Hectares
Allotments	22	35.87
Amenity Green Space	79	37.81
Cemeteries and Churchyards	13	17.84
Civic Spaces	4	1.07
Provision for children and young people	28	5.24
Natural and semi-natural green spaces	39	170.29
Parks and gardens	57	257.95
Outdoor Sports Facilities	63	217.52
Total	**305**	**743.59**

Crime

B.107 In both Cambridge and South Cambridgeshire, public order offences, theft and violent crime are the principal contributors of crime, accounting for the majority of crimes committed.

B.108 There were 15,177 crimes (excluding fraud) reported in the year ending March 2024 in Cambridge. This is a 6.2% increase compared to the previous year **[See reference** 120**]**.

B.109 In March 2023, the ONS Crime Severity Score for total recorded crime in Cambridge was 14. The Severity Score takes account of both volume and the severity of offences, by applying a greater weight to more serious offences. The figure for England and Wales was 16.3 indicating that the combined weight of volume and severity of crimes in Cambridge was lower than the national level. The offence rate per 1,000 individuals in Cambridge was 98 compared to the national average of 87 **[See reference** 121**]**.

B.110 There were 7,439 crimes (excluding fraud) reported in the year ending March 2024 in South Cambridgeshire. This is a 2.2% increase when compared to the previous year **[See reference** 122**]**.

B.111 In March 2023, the ONS Crime Severity Score for total recorded crime in South Cambridgeshire was 7.6. The offence rate per 1,000 individuals was 44 compared to the national average of 87 **[See reference** 123**]**.

Air and Noise pollution

B.113 Air and noise pollution are issues for the health of residents, workers and students in Cambridge and South Cambridgeshire.

B.114 Air quality has previously been an issue along the A14 corridor through South Cambridgeshire, particularly between Bar Hill and Milton, where South Cambridgeshire District Council declared an Air Quality Management Area (AQMA) in 2008. This AQMA was revoked in 2022 following sustained improvements in local air quality. The automatic monitoring sites at Girton and Orchard Park have since been decommissioned due to continued improvements, although automatic monitoring continues elsewhere in the district, including at new sites installed in Harston and Northstowe in 2023. Latest monitoring indicates that annual average PM10 and PM2.5 concentrations slightly decreased at all active sites where comparable data was available. Nitrogen dioxide levels also improved at two of the three active monitoring sites, although a slight increase was recorded at Impington. No daily nitrogen dioxide measurements exceeded the 40 µg/m³ threshold, while PM10 exceeded the 50 µg/m³ daily threshold on one day at Impington and one day at Northstowe. Overall, all measured pollutants in South Cambridgeshire remained below national air quality thresholds, although they continued to exceed the interim targets set out in the joint Air Quality Strategy **[See reference** 124**]**.

B.115 Air quality within Cambridge continues to vary spatially, with higher levels generally associated with more congested central areas and busy roads. The city centre AQMA was established in 2004, principally in response to nitrogen dioxide from road traffic. In January 2026, Cambridge City Council revoked the AQMA because nitrogen dioxide levels had fallen significantly, with no monitored exceedances of the national target level for five years. Further minor improvements in air quality were recorded in Cambridge during 2024, and all measured pollutants were below national air quality thresholds. Annual mean PM10 concentrations at automatic monitoring sites either remained consistent with the previous year or decreased slightly, while nitrogen dioxide concentrations were generally lower than or consistent with the previous year, except at Newmarket Road, where a slight increase was recorded from 16 µg/m³ in 2023 to 17 µg/m³ in 2024. **[See reference** 125**]**.

B.116 High concentrations of nitrogen dioxide can act as an irritant causing inflammation of the airways and, by affecting the immune cells in the lungs, can increase susceptibility to respiratory infections. Additionally, high concentrations of PM_{10} have a close relationship with increased mortality. Noise is a common problem arising from transport, and studies have shown it can have major negative direct and indirect effects on health and well-being, on quality of life and on wildlife. Exposure to

noise can increase stress levels, disrupt communications and disturb sleep. There is scope for transport's noise emissions to be reduced, by cutting the number of cars on the road, low-noise road surfacing, noise barriers, and many other measures.

B.117 The Government implemented the Environmental Noise (England) Regulations in 2006. These regulations deem highway authorities (including Cambridgeshire County Council) to be "noisemaking authorities" in agglomerations of more than 100,000 people (such as Cambridge) or on roads which carry more than six million journeys per year (such as the A1, A1(M), A11 and A14, all managed by the Highways Agency **[See reference 126]**).

Key sustainability issues for Greater Cambridge and likely evolution without the Local Plan

- Key issue: The population structure of South Cambridgeshire reflects an ageing population. This has the potential to result in pressure on the capacity of local services and facilities including healthcare and ensuring the right type of homes are provided. However, Cambridge has one of the 'youngest' populations in the country which needs different housing and social needs. Student numbers at the University of Cambridge and Anglia Ruskin University have increased in recent years, and there remains a need to provide purpose-built student accommodation to help meet demand and reduce pressure on the wider housing stock.
    - Likely evolution: Without the new Local Plan it is likely that services and facilities will still be delivered. Population growth and demographic change is accounted for through many policies within the Cambridge Local Plan, including Policies 56 and 73, which support the creation of accessible, high quality, inclusive and safe developments and the provision of new or improved community, sports and leisure facilities. Similarly, within the South Cambridgeshire Local Plan, Policies SC/3 and SC/4 aim to meet community needs and protect village services and facilities. However, it is less likely that provision supported through these policies will be in appropriate locations, or of sufficient quality and quantity to keep pace with the demands of particular groups. The Local Plan offers an opportunity to deliver the required services and facilities in a coherent, sustainable manner alongside new development.
    - Relevant SA objectives: SA objective 2
- Key issue: Cambridge and South Cambridgeshire are some of the least affordable areas in the country outside London. House prices in Cambridge and South Cambridgeshire remain high compared to the regional and national average and sustained population and employment growth has led to a housing

shortage within Cambridge, with high house prices and low levels of housing affordability. Housing affordability remains challenging, with median house prices substantially above median incomes in both Cambridge and South Cambridgeshire.

- Likely evolution: Without the new Local Plan it is likely that house prices will continue to be an issue across Greater Cambridge. Policy 45 in the Cambridge Local Plan seeks to address the amount of affordable housing for each residential development. Policy H/10 of the South Cambridgeshire Local Plan aims to do the same. However, the new Local Plan offers the opportunity to facilitate and expedite the delivery of affordable housing and private market accommodation, which will also help to meet the needs of more specialist groups including older people. The new Local Plan presents the opportunity to consider supporting the provision of a more appropriate mix of new homes to meet the requirements of local families and those in housing need, including people requiring affordable housing and specialist accommodation.
- Relevant SA objectives: SA objective 1

- Key issue: Overall, Greater Cambridge is not a deprived area. However, there are disparities between the least and the most deprived areas in Greater Cambridge. Two wards within Cambridge are within 20% of the most deprived in the UK. The north-east of Cambridge and parts of South Cambridgeshire experience higher levels of relative deprivation than other parts of the plan area. Fuel poverty affects households in both Cambridge and South Cambridgeshire.
  - Likely evolution: Without the new Local Plan there is potential for issues of disparity to become more apparent in Greater Cambridge. Policies 45, 46 and 51 of the Cambridge Local Plan and Policy H/10 of the South Cambridgeshire Local Plan seek to address the issue of access to housing, including student housing, within Greater Cambridge, while Policies 72 and 73 of the Cambridge Local Pan and Policies HQ/1, SC/3 and SC/4 of the South Cambridgeshire Local Pan seek to support the provision of services and facilities, through high quality design, which are likely to help address improve living standards in Greater Cambridge. These policies would continue to apply in the absence of the Local Plan. However, the new Local Plan presents the opportunity to build on these policies to ensure that indicators of disparity such as access to housing, income deprivation, health deprivation, employment deprivation, living environment deprivation and education skills deprivation are appropriately addressed. This approach will also allow for changing circumstances in Greater Cambridge to be more appropriately addressed.

- Relevant SA objectives: SA objective 1

- Key issue: Health in Greater Cambridge is generally recorded as being at a reasonably good level or higher. While there has been a slight fall in life expectancy at birth, in the plan area in recent years, the overall level of health remains higher than the national level. However, there are inequalities displayed between the most and least deprived areas of Greater Cambridge in terms of health, particularly in Cambridge where inequalities in life expectancy linked to deprivation are pronounced.
  - Likely evolution: The topic of health is intertwined with many policies throughout the current Local Plans of Cambridge and South Cambridgeshire. This includes Policies 5, 56 and 73 from the Cambridge Local Plan and Policies TI/2, HQ/1, SC/3 and SC/4 from the South Cambridgeshire Local Plan, which seek to encourage active modes of transport, create socially inclusive and adaptable environments and provide new or improved community facilities or services. However, without the Local Plan, policies will be less suitable to help prevent the continued inequalities between the most and least deprived areas of Greater Cambridge. The Local Plan presents an opportunity to address health deprivation in Greater Cambridge by supporting the provision of healthcare facilities and other relevant improvements at areas of most need.
  - Relevant SA objectives: SA objective 2
- Key issue: The provision of green space varies throughout Greater Cambridge. For example, open spaces are not evenly distributed, with many suburbs experiencing a relative paucity of open space in comparison with the City Centre and the west of the City. A deficiency in recreational or open space provision has been identified in a number of specific areas including provision for informal play space and outdoor sports. There is also potential for new development to result in loss of access to open spaces and elements of green infrastructure as well as impacts upon their quality.
  - Likely evolution: Policies 59 and 67 of the Cambridge Local Plan ensure external spaces are designed as an integral part of new developments and that open space will not be lost or harmed by new development. Within the South Cambridgeshire Local Plan, Policy SC/1 outlines sites which are to be allocated to meet local need for open space. However, without the Local Plan there is potential that the quality of open spaces will deteriorate and access to these types of provisions in certain areas will remain limited. The Local Plan offers the opportunity to better address the changing circumstances in the plan area by ensuring the protection and enhancement of access to and quality of open space and services and facilities. The

process will also allow for new local green spaces to be planned and incorporated alongside new development.

- Relevant SA objectives: SA objective 3

- Key issue: In general, Greater Cambridge is a relatively safe sub-region in which to live. In recent years however overall recorded crime has increased in both Cambridge and South Cambridgeshire, with public order offences, theft and violent crime forming principal contributors to this.
  - Likely evolution: Policy 56 of the Cambridge Local Plan and Policy HQ/1 of the South Cambridgeshire Local Plan set out design principles for new development in Greater Cambridge. These include the incorporation of measures to reduce opportunities for crime. The Local Plan presents an opportunity to build on the requirement of these policies to encourage aims to make the local environment and streets safer, for example through relevant approaches to 'designing out' crime. Any new policy would make a contribution to achieving this aim alongside other local and national measures.
  - Relevant SA objectives: SA objective 4
- Key issue: The AQMA along the A14 in South Cambridgeshire was revoked in 2022 following sustained improvements in local air quality. Cambridge City Council has announced plans to revoke the city centre AQMA because nitrogen dioxide levels have fallen significantly. However, higher levels of nitrogen dioxide and PM_{10} are reported along main roads and towards the centre of Cambridge City. Residents of existing and any new nearby development could experience adverse health effects associated with air and noise pollution where they are located close to areas experiencing high volumes of traffic. The volume of traffic accommodated in the plan area may increase as new development is delivered and occupied.
- Likely evolution: Policy 36 in the Cambridge Local Plan and Policy SC/12 in the South Cambridgeshire Local Plan seek to minimise air pollution, protect air quality and promote sustainable transport. Without the new Local Plan, development may be located in less sustainable locations leading to an increase reliance on car use, which is likely to exacerbate air pollution. Recent national policies and the emergence of new technologies are likely to improve air quality, for example, through cleaner fuels/energy sources. The, new Local Plan provides an opportunity to contribute to improved air quality in Greater Cambridge through the sustainable siting of development to avoid the adverse impacts of air pollution, and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations.

- Relevant SA objectives: SA objective 13

Economy

Policy Context

International

B.118 The 2030 Agenda for Sustainable Development (2015) **[See reference** 127**]** This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic chapter are:

- SDG 8: Decent Work and Economic Growth.
- SDG 9: Industry, Innovation and Infrastructure.
- SDG 12: Responsible consumption and production.

B.119 There are no specific international economic policy agreements relevant to the preparation of the Local Plan and the SA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade with the European Union and other nations.

National plans and programmes (beyond the NPPF) of most relevance to the Local Plan

B.120 The Planning and Infrastructure Act (2025) **[See reference** 128**]** sets out the Government's ambitions to support housing and economic growth. The Act aims to speed up and streamline the delivery of new homes and critical infrastructure, supporting delivery of the government's Plan for Change milestones of building 1.5 million safe and decent homes in England and fast-tracking 150 planning decisions on major economic infrastructure projects by the end of the current Parliament. It also supports delivery of the government's Clean Power 2030 target by ensuring that key clean energy projects are built as quickly as possible.

B.121 UK Infrastructure: A 10 Year Strategy (2025) **[See reference** 129**]** sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment, supplemented by private financing via carefully targeted public-private partnership models and a new

National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025. It aims to boost growth, align infrastructure with government missions, including housing, clean energy, public services and net zero, reduce planning delays, build institutional capacity, support supply chains and skills development, and provide stability and clarity to investors.

B.122 The UK's Modern Industrial Strategy (2025) **[See reference** 130**]** outlines a 10-year plan to boost business investment and elevate the UK's performance in eight designated growth driving sectors: advanced manufacturing; clean energy industries; creative industries; defence; digital and technologies; financial services; life sciences; and professional & business services. The strategy aims to provide long term stability and certainty to encourage both domestic and international investment, through sector plans, streamlined regulation, enhanced access to finance, including via the National Wealth Fund and British Business Bank, and by accelerating grid connections and infrastructure delivery. It includes regional and place-based initiatives, with targeted support for city regions, industrial clusters and Industrial Strategy Zones to drive inclusive growth across the UK . The strategy is also supported by a robust monitoring framework overseen by a newly established Industrial Strategy Advisory Council, and embeds vocabulary around long-termism, pro-business engagement, competition policy, skills development and innovation.

B.123 Plan for Change (2024) [See reference 131**]** sets out the Government's milestones for growing the economy as well as delivering an improved NHS, safer streets, opportunities for all, and infrastructure for clean energy.

B.124 UK Infrastructure: A 10 Year Strategy [See reference 132**]**: Sets out the government's long-term plan for economic, housing and social infrastructure to drive growth. The strategy is core to delivering the government's growth mission to boost living standards in every part of the UK, by creating and connecting people to good jobs, supporting new housing and neighbourhoods, ensuring people can depend on vital public services and providing resilience in response to a changing world.

B.125 The Levelling Up and Regeneration Act (2023) [See reference 133**]**: Sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve alignment between plans to address cross-boundary issues an encourage new housing development. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.126 Levelling Up the United Kingdom White Paper (2022) [See reference 134]: Sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to economy and employment state that by 2030:

- Pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.
- The number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.
- Domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
- Every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.

B.127 The Growth Plan (2022) [See reference 135]: Makes growth the government's central economic mission, setting a target of reaching a 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services. The Chancellor of the Exchequer's "growth plan" contained a raft of significant tax measures, with major changes being announced for both individuals and businesses.

B.128 Build Back Better: Our Plan for Growth (2021) [See reference 136] Sets out a plan to 'build back better' tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

B.129 The Agricultural Transition Plan 2021 to 2024 (2020) [See reference 137]: Aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making

landscape-scale changes such as establishing new woodland and other ecosystem services).

B.130 Agriculture Act 2020 [See reference 138]: Sets out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. These incentives will provide a vehicle for achieving the goals of the government's 25 Year Environment Plan and commitment to reach zero emissions by 2050. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace.

B.131 UK Industrial Strategy: Building a Britain fit for the future (2018) [See reference 139]: Lays down a vision and foundations for a transformed economy. Areas including artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four 'Grand Challenges' of the future.

B.132 LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) [See reference 140]: The aim of the document is to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government's strategy. Consultation responses set out how the 38 Local Enterprise Partnerships (LEPs) will work with Government using existing and additional resources to develop and implement a long term Industrial Strategy.

B.133 The Local Growth White Paper (2010) [See reference 141]: Highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

B.134 Rural White Paper (2000) (Our Countryside: the future – A fair deal for rural England) **[See reference 142]:** Sets out the Government's Rural Policy Objectives:

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.
- To maintain and stimulate communities, and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.
- To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).

- To promote government responsiveness to rural communities through better working together between central departments, local government, and government agencies and better co-operation with non-government bodies.

Sub-national

B.135 Cambridgeshire and Peterborough Digital Connectivity Strategy 2025-2029 (2025) **[See reference** 143**]**: Seeks to ensure that the Combined Authority can deliver its ambition of outstanding and much needed digital connectivity and that the region continues to exceed the ambitious targets set by Central Government on the availability and accessibility of digital connectivity across the UK, supporting effective public service delivery, thriving communities and sustainable economic growth.

B.136 Cambridgeshire and Peterborough Combined Authority Corporate Strategy 2023-26 (refreshed January 2025) **[See reference** 144**]**: Outlines the authority's goals and plans, focusing on key priorities including improving connectivity, employment and skill opportunities, and achieving good growth.

B.137 Cambridge City Council Corporate Plan 2022-2027 (2022) **[See reference** 145**]**: Sets out four key priorities for the city over the next five years. The priorities include:

- Tackling poverty and inequality and helping people in the greatest need
- Building a new generation of council and affordable homes and reducing homelessness.

B.138 Cambridgeshire and Peterborough Economic Growth Strategy (2022) **[See reference** 146**]**: The primary objective of the growth strategy is to reduce inequality between and within Greater Cambridge, The Fens and Greater Peterborough, whilst increasing productivity and delivering the goal of doubling GVA by 2040, delivering the output to create the jobs and higher wages needed to do so.

B.139 Cambridgeshire and Peterborough Combined Authority Business Plan 2022/23 (2022) **[See reference 147]**: Aims to create a clear, deliverable and fundable set of priorities and schemes which feeds the growth strategy for the combined authority.

B.140 Cambridgeshire and Peterborough Combined Authority Local Growth Plan (2025) **[See reference** 148**]**: Outlines an ambitious regional growth strategy for Cambridgeshire and Peterborough, aiming to accelerate economic expansion through innovation, targeted sectors, and place-based 'Opportunity Zones.' It sets out

scenarios to potentially double or triple the local economy by 2050, supported by infrastructure investment, skills development, and government backing.

B.141 Cambridge Norwich Tech Corridor: Vision and Spatial Strategy Report (2020) **[See reference 149]**: Sets out a vision for the Corridor 'to be internationally recognised as a top-tier destination for technology firms looking to establish, grow and cluster, for highly skilled workers looking for a rewarding career with a strong purpose and rich quality of life, and for businesses and investors seeking the next high-value sustainable opportunity'. The document also includes a spatial strategy, identifying key locations for growth and development in the corridor. The Tech corridor is a partnership between the New Anglia LEP as well as a range of public sector partners, district and county councils, and numerous other stakeholders to include businesses and research institutions.

B.142 Cambridgeshire and Peterborough Local Industrial Strategy (2019) **[See reference 150]**: Sets out a summary of the wider economic context and identifies priorities that work across the three other local industrial strategies, including the Oxford-Cambridge Arc ('the Arc'). These include:

- Working together collaboratively across all of the foundations of productivity to ensure that the implementation of the four Local Industrial Strategies maximises the economic potential of the wider Arc region.
- Harnessing the collective strength of the Arc's research base – driving greater collaboration on science and research; developing a network of 'living labs' to trial and commercialise new technologies; and growing the role of the Arc as a global research and innovation hub.
- Bringing employers and skills providers together to understand the current and future skills needs, and planning provision to meet them.
- Maximising the economic benefits of new transport, energy and digital infrastructure within the Arc.
- Developing an improved business support and finance programme for high growth companies, a shared approach to commercial premises and an Internationalisation Delivery Plan to encourage greater trade and inward investment in the Arc.

B.143 Cambridgeshire and Peterborough Independent Economic Review (2018) **[See reference 151]:** Provides an overview of the Cambridgeshire and Peterborough Combined Authority area and includes 14 key recommendations and another 13 subsidiary recommendations for how the combined authority can sustain its own economy and support the UK economy.

B.144 Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc (2017) [See reference 152]: Provides Government with proposals and options to maximise the potential of the Cambridge-Milton Keynes-Oxford Arc as a connected, knowledge-intensive cluster that competes on a global stage, protecting the area's high quality environment, and securing the homes and jobs that the area needs.

B.145 Findings and recommendations of the London Stanstead Cambridge Corridor Growth Commission (2016) [See reference 153]: set out a 20-year ambition to become a competitive global tech and life sciences region and five priorities to support this, including supporting infrastructure, housing and place-making, building talent and building on existing assets.

B.146 Cambridge Retail and Leisure Study Update (2013) [See reference 154]: Reviews the quality of existing provision and the need for additional retail floor space and leisure uses in Cambridge.

B.147 Cambridge City Centre Capacity Study (2013) [See reference 155]: Examines the capacity of Cambridge City centre to meet the needs of the district and the wider sub-region in the period to 2031. The study will form part of the evidence base for the emerging Local Plan. The objectives of the study are:

- To review the current uses in and functionality of the city centre.
- To explore the existing and future proposed growth of the city and the surrounding sub-region.
- To consider how the city can accommodate the growth without compromising the environment.
- To identify physical opportunities to increase the capacity of the city centre, in terms of development sites.
- To review the boundary of the city centre, as defined in the adopted Local Plan, to assess whether there is a need for revision.
- To define the primary and secondary retail frontages and primary shopping area.
- To assess the potential for alternative management of uses to free up potential capacity.
- To identify potential transport schemes and public realm improvements, which may increase the capacity of the city centre.

B.148 Cambridge Cluster at 50, The Cambridge economy retrospect and prospect (2011) **[See reference 156]:** Aims to:

- Better understand the performance of the Cambridge economy currently (including the impacts of recession), and the factors that underpin and explain this.
- Understand long term opportunities and threats for the economy of Cambridge, taking into account changes in government policy and also the different aspirations of new generations of Cambridge-based businesses and residents.
- Understand the potential synergies and conflicts that exist in relation to Cambridge's different economic roles, both now and looking forward.
- Examine the constraints to economic growth – infrastructural, workforce-related, spatial, attitudinal, and institutional – and to distil what might be done to address these.
- Understand – in broad terms – the spatial implications of the above.

Current Baseline

B.149 The city of Cambridge is an acknowledged world leader in higher education, research and knowledge based industries. Biotechnology, health services and other specialist services also play a major role within the local economy, known as the 'Cambridge Phenomenon'. In 2010, the City had 18,771 jobs within 528 high technology firms. By 2012, employment levels had increased to 19,705 but the numbers of firms had reduced to 465. Over the latest year of data (2021-22 to 2022-23), employment knowledge intensive sectors across the Cambridge City region grew by 5.7%. During this period there has also been a 11.1% increase in employment levels in life sciences, and 18.7% in high-tech manufacturing **[See reference 157]**.

B.150 The economy of the South Cambridgeshire District is also driven by the 'Cambridge Phenomenon' due to its proximity to Cambridge University and Addenbrooke's Hospital. In 2010, South Cambridgeshire had 21,088 jobs within 592 high technology firms, although by 2012 this had decreased slightly to 20,825 jobs in 534 firms **[See reference 158]**. More recent data from the November 2025 Greater Cambridge Employment Update indicates that employment growth in South Cambridgeshire has slowed markedly. Overall employment in the district fell slightly by 0.2% in 2024-25, compared with growth of 3.8% in 2023-24. Within the knowledge-intensive sectors, no sector recorded accelerated growth. Knowledge intensive services remained the strongest performer, growing by 4.4% in 2024-25,

although this was down from 9.0% the previous year. High-tech manufacturing growth slowed from 3.8% to 0.7%, while information technology and telecoms slowed from 3.8% to 0.3%. Life sciences and healthcare, the largest knowledge-intensive sector in South Cambridgeshire, moved into negative growth in 2024-25, with employment falling during the year to mid-February 2025. **[See reference** 159**]**.

B.151 Both Local Plans identify targets for jobs to be provided over the period between 2011 and 2031. In South Cambridgeshire the target is 22,000 jobs, while in Cambridge the target is 22,100 jobs. Data from the ONS Jobs Density data series via Nomis identifies that, between 2011 and 2023, 43,000 additional jobs were created across Greater Cambridge: 19,000 in South Cambridgeshire and 24,000 in Cambridge. The latest AMR notes that this is a workplace-based measure comprising employees, self-employed people, government-supported trainees and HM Forces, and that the dataset has a significant time lag and can be subject to large revisions **[See reference** 160**]**.

B.152 Cambridge's skilled workforce and culture of innovation attract both talent and investment from around the world. AstraZeneca, the pharmaceutical company, opened its global R&D Discovery Centre (DISC) and headquarters at the Cambridge Biomedical Campus in 2018, creating up to 2,000 new jobs. Combining biomedical research, patient care and education on a single site, the campus hosts an emerging cluster of biotech and life sciences firms **[See reference 161]**. In March 2024, it was announced that AstraZeneca will expand its presence at the life sciences cluster in Cambridge, with £200 million in investment. The facility will house around 1,000 employees and will be adjacent to its £1.1 billion global R&D DISC, which already hosts 2,300 researchers and scientists **[See reference 162]**.

B.153 South Cambridgeshire has a range of business and research parks including Cambridge Science Park, Granta Park, and the Babraham Institute. There are a significantly higher proportion of micro businesses than regionally or nationally with 87.7% of businesses employing fewer than 10 people. In addition, there is a significant agricultural sector with many farms diversifying into other sectors, particularly tourism **[See reference 163], [See reference 164]**. Figure B.3 shows the location of key employment areas within Greater Cambridge.

B.154 Currently, education and human health and social work activities make up the largest industry within the city of Cambridge with 20.2% of the working population employed in each sector. The next largest industries are professional, scientific and technical activities at 18.5% **[See reference 165]**. However, in South Cambridgeshire professional, scientific and technical activities make up the largest industry with 23.3% of the working population employed in this sector. The next largest industries are manufacturing with 12.8% and wholesale and retail trade and

information and communication both making up 11.6% of the working population respectively **[See reference 166]**.

B.155 In terms of occupation, professional occupation workers are the largest employment group for South Cambridgeshire (44.7%) followed by associate professionals (11.4%). In the city of Cambridge 49% of workers are within professional occupations **[See reference 167]**.

B.156 Cambridge accommodates approximately 119,000 employee jobs, of which approximately 86,000 (72.3%) are full-time and 32,000 are part-time (26.9%). Employee jobs exclude self-employed, Government-supported trainees and HM Forces. South Cambridgeshire accommodates 86,000 employee jobs, of which approximately 66,000 (76.7%) are full-time and 20,000 are part-time (23.3%) **[See reference 168]**.

B.157 Based on 2021 Census data, 92,870 people work in Cambridge. This includes 60,189 who live and work in Cambridge, and 32,681 who commute. The largest movement into Cambridge is 14,014 people from South Cambridgeshire, followed by East Cambridgeshire (3,824 people) and West Suffolk (3,730 people). In terms of outflow, a total of 10,402 residents travel out of Cambridge for work. This includes 5,374 residents who commute to South Cambridgeshire, 622 to West Suffolk, and 565 to Peterborough **[See reference 169]**.

B.158 In relation to South Cambridgeshire, data from the 2021 Census indicates that 82,063 work within the district. This includes 59,199 residents who live and work in South Cambridgeshire and 22,864 who commute. The largest movement into South Cambridgeshire is 5,374 people from Cambridge, followed by 3,476 from Huntingdonshire, and 3,052 people from Suffolk **[See reference 170]**.

B.159 The proportion of commuting trips originating from outside the city is significantly greater for the ‘fringe’ employment sites, such as the Science Park and Biomedical Campus, where future growth is expected to be focused. 59% of trips to the Science Park originate from outside of Cambridge City, with 29% from outside Cambridge and South Cambridgeshire; similarly, 46% and 17% of trips to south east Cambridge (including the Biomedical Campus) originate from outside Cambridge City and South Cambridgeshire respectively **[See reference 171]**.

B.160 According to the most recent statistics (2024), Cambridge City’s unemployment rate has risen to 5.0%, significantly higher than the regional average of 3.2% and the national average of 3.7%. This marks a significant increase from 2.8% in 2022 **[See reference 172].** However, while unemployment has risen, the economic activity rate has also increased, suggesting that more people who were previously inactive in the job market - such as students, or those who paused their

careers during the pandemic - are now actively seeking employment **[See reference 173]**. South Cambridgeshire has a comparatively lower unemployment rate (2.3%) **[See reference 174]**.

B.161 The Oxford-Cambridge Arc (the Arc) spans the five ceremonial counties of Oxfordshire, Northamptonshire, Buckinghamshire, Bedfordshire and Cambridgeshire. The area between Oxford and Cambridge, forms the core spine of the Arc. There are vital links from the Arc, including important connections to the Midlands, to the M4 corridor and Heathrow Airport, to London and the Greater South East, and to the rest of East Anglia. The Arc accounts for 7.1% of England's economic output (measured by Gross Value Added, or GVA) and it is home to some of the country's fastest growing and most innovative places. Cambridge's rate of patent applications – a key indicator of innovation – is the highest in the UK, at over 12 times the national average.

B.162 Forecasts vary, but successive studies have found that there are opportunities for transformative growth in the area. With the right interventions and investment, economic forecasts suggest that by 2050 economic output could grow by between £80.4 billion and £163 billion per annum, with between 476,500 and 1.1 million additional jobs **[See reference 175]**.

B.163 The Cambridge Norwich Tech Corridor is a partnership between a range of public sector partners, district and county councils, and numerous other stakeholders, including businesses and research institutions. It seeks to bring together these stakeholders to grow technology businesses in the area and promote the area as a world-class destination for technology businesses and investment. Cambridge is identified as a key cluster within the corridor, and the corridor's spatial strategy focuses on improving affordability of housing to support sustainable growth here **[See reference 176]**.

B.164 The London Stanstead Cambridge Corridor is driven by the London Stanstead Cambridge Growth Commission. The Commission was established as an independent initiative by the London Stanstead Cambridge Consortium, a partnership of public and private organisations covering the area north of Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the Lee Valley and M11/A10, and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge. The partnership was formed to organise and promote what is a clear economic area, with strong inter-connections; commuting to work and learn patterns, clusters of industries and supply chains. The area is home to strong business clusters, ranging from high-tech digital and bio-medical to logistical, resource recovery and food manufacturing. The consortium's focus is to promote the economic development of

the area, unlocking the potential of this successful but underdeveloped area, without compromising the existing quality of life **[See reference 177]**.

B.165 The Growth Commission ran from July 2015 until July 2016, with a final report launch at the Houses of Parliament. The Growth Commission is now closed. The final report of the Growth Commission highlighted that the area is already a strong leader in the UK for ideas, innovation and entrepreneurship and will continue to grow, with a focus on technology and life sciences. However, the corridor is currently falling behind in terms of quality of place, infrastructure, scaling up businesses and workforce skills. In light of this, the report sets out a vision and delivery plan to become a competitive global tech and life sciences region by 2036 **[See reference 178]**.

B.166 The UK left the European Union on the 31st of January 2020. It is still uncertain what effect this will have on the Greater Cambridge economy, particularly given its world-renowned status within the education, research and knowledge-based industries.

Figure B.3: Employment areas in Greater Cambridge

Regulation 19 Sustainability Appraisal
Cambridge City Council and South Cambridgeshire District Council

LUC

Figure B.3 : Key Employment Areas within Greater Cambridge

- Greater Cambridge boundary
- Neighbouring local authority
- Addenbrooke's Hospital
- Business / Science Park
- Established employment area
- Protected industrial site

0 5 10 km

Map scale 1:175,000 @ A3

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Key sustainability issues for Greater Cambridge and likely evolution without the Local Plan

- Key issues: Cambridge needs to ensure that it can continue its vital role as a world class centre for higher education, research and knowledge-based industries as the regional, national and global economies rely on it. Recent data shows continued employment growth in knowledge intensive sectors across Cambridge City, particularly in life sciences and high-tech manufacturing, although employment growth in South Cambridgeshire has slowed markedly, with life sciences and healthcare moving into negative growth in 2024-25.
  - Likely evolution: It is uncertain how the knowledge-based industries would change without the implementation of the Local Plan and some degree of change is inevitable, particularly given the ongoing uncertainties posed by Brexit and recent signs of slower growth in some knowledge-intensive sectors. However, the new Local Plan offers the opportunity to create and safeguard jobs through the allocation and promotion of employment generating uses including office and industrial spaces. Policy 43 of the Cambridge Local Plan aims to support the development or redevelopment of faculty, research and administrative sites for the University of Cambridge and Anglia Ruskin University.
  - Relevant SA objectives: SA objective 14
- Key issues: Greater Cambridge needs to continue to enable a future supply of jobs and continued investment to ensure identified employment development opportunities are taken forward and deprivation issues are tackled. Although the focus of employment is on Cambridge City, there is a need to support a diverse range of employment opportunities across Greater Cambridge, for example, in the smaller settlements. Within Cambridge City, despite the focus on higher education, research and knowledge-based industries, there is a need for a variety of employment opportunities, both skilled and lower-skilled across a range of economic sectors. This is particularly important given the increase in Cambridge's unemployment rate, while South Cambridgeshire continues to record a comparatively low rate.
  - Likely evolution: It is uncertain how the job market would change without the implementation of the new Local Plan and some degree of change is inevitable, particularly given the uncertainties posed by Brexit and recent changes in employment growth across Greater Cambridge. However, the new Local Plan offers the opportunity to create and safeguard jobs through the allocation and promotion of employment generating uses including office

and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all. Policies 40, 41 and 42 of Cambridge Local Plan sets out how the Council will support and improve the economy of the city. Policy 77 supports the development of new visitor accommodation and will help retain the economic benefits of the visitor/tourism sector within the local economy by providing service-related jobs. The South Cambridgeshire Local Plan contains Policies E/18, E/19 which aim to support the agricultural and tourism sectors.

- Relevant SA objectives: SA objective 15

- Key issues: Significant development is likely within the growth corridor formerly referred to as the Oxford-Cambridge Arc. The previous Conservative government originally put plans in place for the 'OxCam Arc' in 2020, with the role of Cambridge City acting as a key component. The current government announced plans to "unleash the potential of the Oxford-Cambridge Growth Corridor" through funding and support for the development of new and expanded communities and transport infrastructure in the corridor. However, this development must be done sustainably to ensure the long term success of the area.
  - Likely evolution: As Cambridge is amongst the UK's most productive, successful and fast-growing cities, it is likely that growth along this corridor will affect the local economy even without implementation of the new Local Plan. However, the new Local Plan offers the opportunity to help shape the growth corridor and support Greater Cambridge's contribution to this to create the necessary infrastructure, from public transport to housing, in the most sustainable way.
  - Relevant SA objectives: SA objective 14

Transport and Air Quality

Policy Context

International

B.167 The Trans-European Networks (TEN) [See reference 179]: Created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T),

which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

B.168 The 2030 Agenda for Sustainable Development (2015) **[See reference 180]** This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 9: Industry, Innovation and Infrastructure.
- SDG 11: Sustainable Cities and Communities.
- SDG 13: Climate Action.
- SDG 3: Good Health and Well-Being
- SDG 7: Affordable and Clean Energy
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production

National plans and programmes (beyond the NPPF) of most relevance to the Local Plan

B.169 Better Connected: A Strategy for Integrated Transport (2026) **[See reference 181]** sets out the UK government's long-term vision for domestic transport in England, aiming to make transport safe, reliable, affordable and accessible so people can make the journeys they need more easily. The strategy is built around three guiding principles: putting people at the heart of transport, using transport to create better connected places, and working in partnership with local leaders, industry and the wider transport sector. It identifies eight priorities for delivery: simplifying payments and travel information; providing safe and dependable journeys; making travel more accessible and affordable; creating healthier communities through walking, wheeling, cycling and cleaner transport; aligning transport with housing and development; championing data and technology; empowering local leaders; and improving decision-making and appraisal. Backed by a £30 billion transport settlement, the strategy supports integrated ticketing, better real-time information, rail reform through Great British Railways, improved road and pavement maintenance, stronger bus services, transport decarbonisation, and greater devolution of transport powers and funding. The overarching aim is to create a more joined-up transport system that improves everyday journeys, supports economic growth, reduces regional disparities and gives communities better access to jobs, services and opportunities.

B.170 The Clean Power 2030 Action Plan (2024) **[See reference** 182**]** sets out a pathway to a clean power system by 2030, outlining what the Government will do to support and accelerate delivery of the new infrastructure. It seeks to address the following challenges:

- To maintain a secure and affordable energy supply in an increasingly unstable world.
- To create new industries and investments around the country.
- To protect the environment we live in from the most damaging effects of climate change.

B.171 Future of Transport: supporting rural transport innovation (2023) [See reference 183**]**: Shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights the importance of transport to everyday life rural life and provides guiding principles for the introduction of new technologies and services.

B.172 The Levelling Up the United Kingdom White Paper (2022) [See reference 184**]**: Sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030, which includes the following key mission relating to transport and travel:

- By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.

B.173 The Cycling and Walking Investment Strategy Report to Parliament (2022) [See reference 185**]**: Sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

B.174 Future of freight plan (2022) [See reference 186**]**: The vision is to create a freight and logistics sector that is cost-efficient, reliable resilient, environmentally sustainable and valued by society. It identifies the main challenges, objectives and actions that need to be taken in the following 5 priority areas:

- National Freight Network (NFN)
- Enabling the transition to net zero
- Planning

- People and skills
- Data and technology

B.175 Establishing the Best Available Techniques for the UK (UK BAT) (2022) **[See reference** 187**]**: Sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework.

B.176 The Environment Act 2021 **[See reference** 188**]**: Sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

B.177 Decarbonising Transport: A Better, Greener Britain (2021) **[See reference** 189**]**: The Decarbonisation Transport Plan (DTP) sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DPT also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

B.178 Decarbonising Transport: Setting the Challenge (2020) **[See reference** 190**]**: Sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies **[See reference** 191**]** to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.179 Clean Air Strategy (2019) [See reference 192]: Sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.180 Department for Transport, The Road to Zero (2018): [See reference 193]: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.181 A Green Future: Our 25 Year Plan to Improve the Environment (2018) [See reference 194]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. The area of relevance to this chapter is: increasing resource efficiency and reducing pollution and waste. Actions that will be taken as part of this key area are as follows:

- Increasing resource efficiency and reducing pollution and waste:

  f) Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

B.182 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017) [See reference 195]: Sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.183 Transport Investment Strategy (2017) [See reference 196**]**: Sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;

- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

B.184 Highways England Sustainable Development Strategy and Action Plan (2017) [See reference 197]: This strategy is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

B.185 The Air Quality Standards Regulations (2016) [See reference 198] set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

B.186 Door to Door: A strategy for improving sustainable transport integration (2013) [See reference 199]: Focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options.
- Convenient and affordable tickets.
- Regular and straightforward connections at all stages of the journey and between different modes of transport.
- Safe and comfortable transport facilities.

B.187 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

B.188 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2011) [See reference 200]: Sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be

achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

B.189 Environmental Protection Act 1990 [See reference 201]: makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

Sub national

B.190 Cambridgeshire County Council Transport Delivery Plan 2024-2028 (2024) [See reference 202]: Sets out the transport infrastructure, services and initiatives that are required to support the growth of Cambridgeshire.

B.191 Greater Cambridge Air Quality Strategy 2024 – 2029 (2024) [See reference 203]: Outlines how improvements to air quality will continue to be delivered across Greater Cambridge. The Strategy focuses on sources of pollution that can be influenced locally by all partner organisations, working across a range of disciplines which all either directly or indirectly offer improved air quality.

B.192 Cambridgeshire and Peterborough Bus Strategy (2023) [See reference 204] Sets out the ways in which bus travel might be made more convenient, attractive and easy to use, such that it becomes the obvious way to make a journey.

B.193 Cambridgeshire and Peterborough Local Transport and Connectivity Plan (2023) [See reference 205]: The Local Transport and Connectivity Plan (LTCP) is the Combined Authority's long-term strategy to make transport in Cambridgeshire and Peterborough better faster, greener, and more accessible for everyone. The Plan focuses on six goals:

- Productivity: Giving both employers and people the means to achieve more of their potential, making them more efficient and more innovative to create more prosperity.
- Connectivity: People and communities are brought closer together, giving more opportunity for work, education, leisure and pleasure.

- Climate: Successfully and fairly reducing emissions to net zero by 2050.
- Environment: Protecting and improving green spaces and improving nature with a well-planned and good quality transport network.
- Health: Improved health and wellbeing enabled through better connectivity, greater access to healthier journeys and lifestyles and delivering stronger, fairer, more resilient communities.
- Safety: To prevent all harm by reducing risk and enabling people to use the transport system with confidence.

B.194 Draft Interim Greater Cambridge Transport Strategy (2026) **[See reference** 206**]** is an emerging child document to the Cambridgeshire and Peterborough Local Transport and Connectivity Plan. It sets out a long-term, ambitious framework for transport and connectivity across the whole of Greater Cambridge and on the priority routes that connect it to the wider region and country – local towns and cities, regional hubs, and major port and airport gateways to the rest of the world. Its objectives comprise:

- Establishing practical, phased solutions to congestion in and around Cambridge
- Supporting businesses and our priority economic sectors, including the research campuses and science parks
- Enabling new development and homes, including the sites in the emerging

  Local Plan
- Connecting homes, disadvantaged areas and the wider region to the economic opportunities of Cambridge
- Reducing emissions and enhancing the local environment:

B.195 Cambridge City Climate Change Strategy 2021-2026 (2021) **[See reference** 207**]:** Includes six key objectives to address the causes and consequences of climate change:

- Reducing carbon emissions from buildings, land, vehicles and services
- Reducing energy consumption and carbon emissions from homes and buildings
- Reducing carbon emissions from transport
- Reducing consumption of resources, reducing waste, and increasing recycling
- Promoting sustainable food

- Supporting residents, businesses and our services to adapt to the impacts of climate change

B.196 Cambridge City Carbon Management Plan 2021-2026 (2021) [See reference 208]: Sets out how the Council will reduce carbon emissions from buildings, land, fleet vehicles and business travel to help achieve objective 1 of the Climate Change Strategy.

B.197 South Cambridgeshire Zero Carbon Strategy (2020) [See reference 209]: Outlines the council's approach to supporting the transition to net zero carbon in the District.

B.198 Cambridge City Council Air Quality Action Plan 2018-2023 (2019 update) **[See reference 210]:** Sets out Cambridge City Council's priority actions for improving areas of poor air quality in the city and maintaining a good level of air quality in a growing city.

B.199 Cambridge City Electric Vehicle and Infrastructure Strategy (2019) [See reference 211]: Identifies opportunities to improve the uptake of electric vehicles in Cambridge, including promoting funding opportunities, improving the delivery of charging points and associated infrastructure, and considering EV as a preference for all City Council fleet replacements.

B.200 Cambridge City Council and South Cambridgeshire District Council Infrastructure Delivery Study (2015) [See reference 212]: Assessed the infrastructure requirements, costs and known funding related to planned growth, particularly the strategic sites, and identified any phasing issues that might have affected the proposed growth and advise on the future delivery of infrastructure needed to support the planned growth. An updated Infrastructure Delivery Plan is being prepared for the emerging Greater Cambridge Local Plan.

B.201 Air Quality Action Plan for the Cambridgeshire Growth Areas (2009) [See reference 213]: Reviewed all of the existing air quality information across the regions, identified the key causes in each management area and assessed the necessary actions needed to improve pollutant levels in those areas.

B.202 Cambridge City Council 'Greening Your Home' [See reference 214]: Provides information on how individuals can change their lifestyles to become more environmentally sustainable including saving energy and water, using sustainable transport, eating sustainable food and greening gardens.

Current Baseline

Connections and Infrastructure

B.203 Cambridge has direct infrastructure links to the A14 and M11, providing easy access to London and the Eastern port of Felixstowe. A short distance along the A14 leads to the A1, one of the major road networks linking the north and south of the country. Access to London by rail takes approximately 50 minutes from Cambridge. As shown in Figure B.4, Cambridge has two railway stations, including the Cambridge North station, which opened in 2017 and is on the Fen Line running from Cambridge to King's Lynn. It connects to the Cambridgeshire Guided Busway and provides an interchange with Park & Ride and local bus services. Cambridge is also within an hour drive of the international airports of Stansted and Luton and less than two hours from Gatwick, East Midlands and Birmingham Airports. Cambridge also houses its own International Airport which is privately owned. The nearest major ports to Cambridge are Felixstowe (which is directly linked to Cambridge via the A14 road network), Great Yarmouth, Lowestoft, Ipswich and Harwich in Essex. Smaller ports such as Wisbech and King's Lynn are about 40 miles away.

B.204 As a small city, Cambridge suffers from a number of serious local transport problems, particularly in relation to traffic congestion on radial routes and in respect of public transport capacity in the city centre. Both the highway and bus networks suffer from limited capacity, which is unlikely to be able to cater for significant increases in traffic volumes without worsening congestion or lengthening journey times. Chronic congestion is already commonplace within the city, with common journeys – such as the City Centre to Cambridge Station – often faster on foot than by car or bus. Traffic congestion in Cambridge is particularly problematic for buses, causing unreliability. Vehicle tracking data from December 2019 indicated that on routes serving Cambridge City centre, only 79% of buses departed from their origin stop on time **[See reference** 215**]**. Traffic congestion is expected to worsen in future without investment, which limits accessibility, worsens air quality and fundamentally undermines quality of life **[See reference 216]**.

B.205 Based on outputs of the Census 2021, 74% of the commuting population in the wider Cambridgeshire and Peterborough area on average travels via private vehicle modes to work (both driver and passenger journeys), this is significantly higher than the national average of 48%. Active travel represents 20% of commuting journeys across the Cambridgeshire and Peterborough area and 5% are represented by public transport. Cambridge, however, has different commuting behaviours compared to the rest of the Cambridgeshire and Peterborough districts. 49% of commuting journeys in Cambridge are made by active travel modes, which is 29%

higher than the Cambridgeshire and Peterborough average. Cambridge also has higher levels of public transport commuting compared to the Cambridgeshire and Peterborough average at 9% **[See reference** 217**]**.

B.206 In order to support the planned growth in Greater Cambridge, the Greater Cambridge Partnership (GCP) was established. It is the local delivery body for a City Deal agreed with central Government, bringing powers and investment (up to £1 billion over 15 years) for vital improvements to social and transport infrastructure **[See reference 218]**. This includes investment in major strategic transport infrastructure including the North Cambridge train station (Cambridge Science Park), which opened in 2017, the A14 Cambridge to Huntingdon improvement, completed in 2022, and a number of other high-profile schemes **[See reference 219]**. Within Cambridgeshire, several new mass transit links are currently under development by the Greater Cambridge Partnership including, but not limited to, rural travel hubs (bespoke rural transport interchanges) currently being piloted in South Cambridgeshire, to better connect residents with public transport and cycling/walking routes with the aim of reducing private car journeys into Cambridge from rural villages **[See reference 220]**. The evolution of the bus network has also not kept pace with the polycentric growth of Cambridge, meaning many jobs at the Biomedical Campus, Science Park, West Cambridge site and other employment areas are not well served and there is a lack of connectivity, in particular direct services, from residential areas **[See reference** 221**]**.

B.207 The Transport Strategy for Cambridge and South Cambridgeshire **[See reference 222]** includes major investment in demand management and bus priority measures, aimed at giving the bus a competitive advantage on all major corridors into the city, and when making orbital movements around Cambridge. The opening of The Busway has improved the quality of the public transport network between Huntingdon, St. Ives and Cambridge and decreased traffic congestion on the A14. Bus patronage in Cambridgeshire increased by 61% between 2001 and 2008, with a 100% increase in Cambridge. Between 2011/12 and 2012/2013 an additional 209,113 passenger journeys were made across Busway and Park & Ride services. In Cambridge, there are sections of bus lane on Hills Road, Trumpington Road, Histon Road, Milton Road, Newmarket Road, Madingley Road and Huntingdon Road, along with a number of bus only sections of road **[See reference** 223**]**. Additionally, a dedicated cycle route has been built alongside The Busway between St Ives and north Cambridge and is part of the National Cycle Network Route 51. This route provides a high quality direct link from St Ives and the villages along the route into Cambridge and vice versa **[See reference 224]**. Some of the key aspects of the Cambridgeshire and Peterborough Combined Authority Local Transport Plan (2023) include a shift towards reducing the need to travel and encouraging modal shift through the ‘avoid – shift – improve’ framework. This includes prioritising high-quality

active travel infrastructure, enhanced and integrated public transport (including improved bus services, demand responsive transport and rail enhancements) and the development of multi-modal travel hubs **[See reference 225]**.

B.208 When considering carbon emissions, transport is responsible for 28% of emissions in the UK, but only 18% of emissions in Cambridge **[See reference** 226**]**. This could be in part due to relatively high usage of sustainable modes of transport amongst Cambridge residents. For example, a significant proportion of the City's population already cycle regularly, with the 2021 Census data confirming that 16.8% of residents in the city cycle to work **[See reference** 227**]**. A 2016 report sets out that 'Cambridge has the highest level of cycling in the UK and without this it is hard to see how the city could function efficiently and maintain its high quality of life' **[See reference** 228**]**. In South Cambridgeshire, the percentage of people cycling to work is 4.6% a relatively high level for a more rural district **[See reference 229]**. Travel to work by sustainable modes of transport (public transport, walking and cycling) is much higher within Cambridge City (at around 31.3% of those in employment), than within South Cambridgeshire (at around 11.5% of those in employment) **[See reference 230]**.

B.209 There are currently 12 Greenways routes within Greater Cambridge which are important corridors for both wildlife and people. In 2016, a report was produced containing recommendations for Greenways which, when implemented, should increase levels of cycling and walking and be of benefit to as many as possible. The Greenways project is aiming to establish a high quality network of the 12 separate routes. There is particular emphasis on commuting into Cambridge, from within Greater Cambridge in order to reduce traffic congestion as the city grows, and to improve the health of the population. A successful Greenways Network around Cambridge is likely to be a key part of the future success of the Greater Cambridge area **[See reference 231]**.

B.210 Rural areas often see lower cycle and pedestrian trip rates than Cambridge and the market towns, due to the larger distances that typically need to be covered, although South Cambridgeshire has the highest levels of out commuting of any rural district in the County. Roads in rural areas are often less suitable for cycling because traffic speeds are high and space on the carriageway is limited. Large vehicles and poor visibility at bends can also create an environment which is not safe for cyclists, making it very difficult to travel sustainably to villages or towns that may actually be very close and often well within the acceptable distance for cycle trips or walking. It is therefore acknowledged that the potential to induce modal shift towards foot and bicycle is not as high as in urban areas, however, if suitable facilities and continuous routes are provided there are a large number of short trips that could be transferred. The Local Transport and Connectivity Plan (2023) **[See reference** 232**]** aims to

support the undertaking of at least half of all journeys in towns and cities to be walked, wheeled or cycled. This is to be achieved through the delivery of high-quality, safe and coherent active travel networks, integrated with public transport and supported by measures to encourage behavioural change and reduce reliance on private car use. Existing improvements to cycling and walking infrastructure across South Cambridgeshire contribute to these objectives, including the provision of off-road routes that link settlements to key destinations such as rail stations, schools and employment sites. Examples include the Ashared use path alongside the 10 at Shepreth, route connecting Sawston to Granta Park and Whittlesford train station and the extension of the cycleway alongside the A1307 from Wandlebury to the Babraham Research Campus.

B.211 Limited connectivity across the region limits opportunities for less prosperous neighbourhoods within Greater Cambridge, and the surrounding region. While Greater Cambridge is one of the UK's most productive and successful regions, it retains pockets of deprivation, with limited labour market opportunities and higher levels of unemployment.

Air Quality

B.212 Poor air quality can lead to a number of health issues. Particulate matter and nitrogen dioxide alone have been estimated to have health costs of around £22.6 billion every year **[See reference** 233**]**.

B.213 Two main factors cause excessive transport-related pollution within the sub-region: the employment, education and tourist centre of Cambridge; and the prevalence of long-distance freight on the A14 east-west corridor. These factors lead to high numbers of longer than average commutes to and from Cambridge and a very high proportion of heavy goods vehicles on the trunk roads. The resulting congestion on trunk routes and the centres of Cambridge and the surrounding market towns also exacerbates the problems associated with high traffic flows.

B.214 There are presently no AQMAs declared within Greater Cambridge. Previously, there was an AQMA declared within South Cambridgeshire in an area along the A14 between Bar Hill and Milton and within Cambridge City in an area encompassing the inner ring road and all land within it. These AQMAs were revoked in January 2022 and January 2025, respectively.

B.215 High concentrations of NO_2 can act as an irritant causing inflammation of the airways and, by affecting the immune cells in the lungs, can increase susceptibility to respiratory infections. Additionally, high concentrations of PM_{10} have a close relationship with increased mortality **[See reference 234]**.

B.216 In light of technological improvements in recent years and traffic levels in the County remaining broadly similar over the past decade, air pollution levels have shown slight decreases in Cambridge and South Cambridgeshire. Nitrogen dioxide and PM_{10} levels have declined, while $PM_{2.5}$ levels have remained stable or decreased. Although all measured pollutants remain below national air quality thresholds, they still exceed interim Air Quality Strategy targets **[See reference 235]**. Areas of highest nitrogen dioxide and particulate matter concentration are found towards the centre of Cambridge City and along the main roads in the plan area **[See reference** 236**]**. Air quality in the plan area is shown in **Figure B.5a for NO_2 and B.5b for PM_{10}**.

B.217 The Cambridgeshire and Peterborough Healthy Places Joint Strategic Needs Assessment (JSNA) from 2024 sets out several interventions that might be used to mitigate air pollution in the plan area. These include the incorporation of green infrastructure, promotion of lower emissions public transport vehicles and consideration of low emissions zones **[See reference** 237**]**.

B.218 The Cambridgeshire and Peterborough Local Transport and Connectivity Plan includes ambitious plans to improve the transport network over the coming years, which are likely to help relieve these issues. A key part of the Local Transport and Connectivity Plan is to reduce the amount of car journeys in Cambridgeshire and Peterborough. It sets out to achieve a 15% reduction in car mileage by 2030.

B.219 In addition, the Greater Cambridge Greenways Project involves a high quality network of routes from South Cambridgeshire into Cambridge from some of the surrounding towns and villages aiming to increase levels of cycling and walking, in order to reduce traffic congestion as the city grows, as well as to improve the health of its population.

B.220 There is currently no Clean Air Zone in Cambridge City. In 2019 Cambridge City Council undertook a Feasibility Study to investigate whether introducing one or more clean air zones in Cambridge would help reduce air pollution. Consideration was also given to the implementation of a Sustainable Travel Zone as part of the Making Connections Programme in 2023. The Sustainable Travel Zone would have resulted in a charge on vehicles entering the zone. The decision was made in 2023 to not pursue a Sustainable Travel Zone in Cambridge **[See reference 238]**.

Figure B.4: Sustainable transport links

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Figure B.4 : Sustainable transport links in Greater Cambridge

- Greater Cambridge boundary
- Neighbouring local authority
- Railway station
- Bus stop
- National Cycle Network (NCN)
- Public Rights of Way (PRoW)

0 5 10 km

Map scale 1:175,000 @ A3

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Figure B.5a: Air quality (NO2)

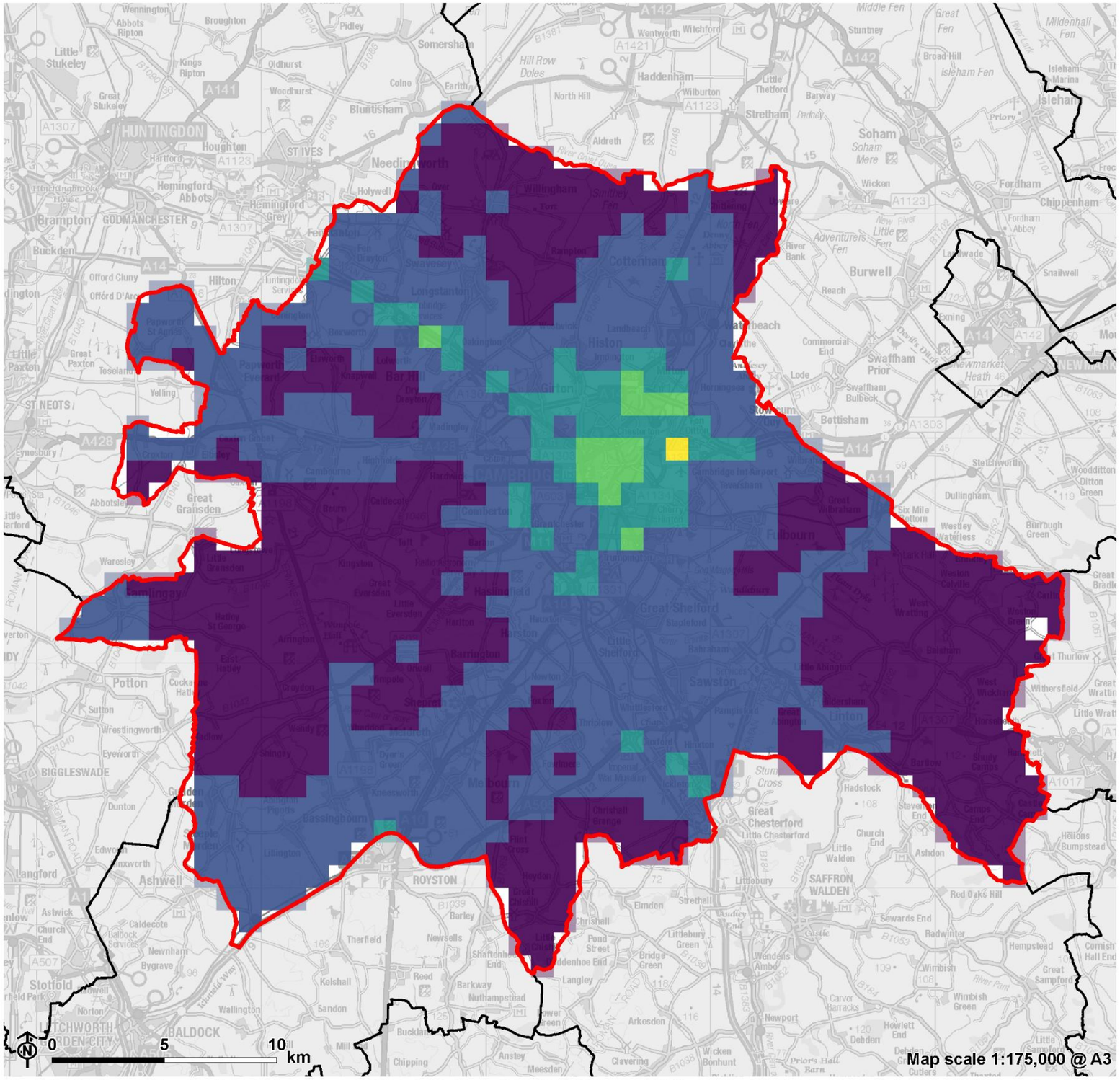

HUNTINGDON
ST IVES
ST NEOTS
GODMANCHESTER
Brampton
Hilton
Buckden
Offord Cluny
Offord D'Arcy
Hemingford Abbots
Hemingford Grey
Houghton
Bluntisham
Somersham
Needingworth
Willingham
Cottenham
Longstanton
Histon
Impington
Landbeach
Waterbeach
Burwell
Reach
Soham
Soham Mere
Stretham
Wilburton
Haddenham
Aldreth
Fordham
Chippenham
Isleham
Newmarket
Swaffham Prior
Swaffham Bulbeck
Bottisham
Lode
Commercial End
Great Shelford
Sawston
Stapleford
Hauxton
Trumpington
Barrington
Shepreth
Foxton
Melbourn
Meldreth
Royston
Ashwell
Langford
Biggleswade
Potton
Sandy
Great Gransden
Abbotsley
Eynesbury
Great Paxton
Little Paxton
Yelling
Papworth Everard
Elsworth
Knapwell
Boxworth
Swavesey
Fen Drayton
Conington
Lolworth
Bar Hill
Dry Drayton
Madingley
Cambourne
Caldecote
Toseland
Hardwick
Coton
Grantchester
Comberton
Barton
Haslingfield
Harlton
Haslingfield
Great Eversden
Little Eversden
Wimpole
Arrington
Orwell
Barrington
Shepreth
Foxton
Meldreth
Thriplow
Whittlesford
Duxford
Pampisford
Hinxton
Ickleton
Great Chesterford
Little Chesterford
Saffron Walden
Littlebury
Elmdon
Strethall
Chrishall
Arkesden
Clavering
Newport
Wendens Ambo
Littlebury Green
Bridge Green
Pond Street
Langley
Shadwell End
Reed
Barkway
Nuthampstead
Therfield
Kelshall
Newsells
Barley
Caldecote
Baldock
Bygrave
Newnham
Wallington
Sandon
Norton
Stotfold
Astwick
Church End
Arlesey
Hitchin
Letchworth Garden City
Baldock
Buckland
Chipping
Anstey
Meesden
Wicken Bonhunt
Priors Hall Barn
Carver Barracks
Debden
Howlett End
Wimbish
Wimbish Green
Great Sampford
Hempstead
Radwinter
Sewards End
Red Oaks Hill
Little Walden
Church End
Ashdon
Hadstock
Great Chesterford
Little Chesterford
Stump Cross
Helions Bumpstead
Withersfield
Little Wratting
Great Wratting
Thurlow
Linton
Balsham
West Wickham
Weston Colville
Great Bradley
Burrough Green
Westley Waterless
Six Mile Bottom
Dullingham
Stetchworth
Woodditton
Ditton Green
Snailwell
Exning
Isleham Marina
Isleham Priory
Fordham Abbey
Lakenheath
Mildenhall Fen
Great Fen
Middle Fen
Stuntney
Broad Hill
Isleham Fen
Little Thetford
Barway
Wicken
Adventurers Fen
River Bank
New River
Little Ouse
Denny Abbey
Willingham Fen
Smithey Fen
Holywell
Aldreth
Hill Row Doles
North Hill
Wentworth
Witchford
Somersham
Earith
Colne
Woodhurst
Oldhurst
Pidley
Broughton
Wennington
Abbots Ripton
Kings Ripton
Little Stukeley
Great Stukeley
A141
A1
A14
A428
A1307
A1123
A142
A1421
A1303
A1134
A1198
A1301
A505
A507
A1017
A11
A45
A120
A1198
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A1123
A1198
A1301
A1198
A1307
A1123
A1198
A1301
A1198
A1307
A1123
A1198
A1301

Figure B.5b: Air quality (PM10)

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Figure B.5b : Air quality in Greater Cambridge (PM10)

Greater Cambridge boundary
Neighbouring local authority

PM10 Level (µg/m³)

- 11-12
- 12.1-13
- 13.1-14
- 14.1-15
- 15.1-16
- 16.1-17

0 5 10 km

Map scale 1:175,000 @ A3

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Key Sustainability Issues for Greater Cambridge and likely evolution without the Local Plan

- Key issues: Both highway and bus networks suffer from limited capacity. Without major interventions, it is unlikely that these networks will be able to cater for significant increases in traffic volumes without worsening congestion and lengthening journey times.
  - Likely evolution: Policy 5 of the Cambridge Local Plan and Policy TI/2 of the South Cambridgeshire Local Plan address the provision of new infrastructure to meet additional needs resulting from new development. They also support the aim of achieving an integrated community connected by a sustainable transport system in Greater Cambridge. The Cambridgeshire and Peterborough Local Transport and Connectivity Plan (LTCP) sets out ambitious aims to invest in a properly joined-up, net zero carbon transport system, which is high quality, reliable, convenient, affordable, safe, and accessible to everyone, and would therefore help relieve these issues. The draft interim Greater Cambridge Transport Strategy identifies transport interventions to support delivery of the LTCP at a Greater Cambridge level. However, without the new Local Plan there is still potential for congestion to continue to be an issue in Greater Cambridge, particularly given that the growing population is likely to exacerbate this issue. The new Local Plan presents the opportunity to address this by providing clarity for infrastructure providers and also to strengthen policy to promote the use of alternative modes of transport. It also has the potential to direct new development to the most sustainable locations to minimise the need to travel by private vehicle, at least within the local route network. This approach can be used to complement measures taken by highways authorities to combat congestion on the strategic road network.
  - Relevant SA objectives: SA objective 12, SA objective 13
- Key issues: Given the rural character of much of the area beyond Cambridge City itself, a large proportion of the District's residents drive to work and some have limited access to bus services and other public transport links. In these more rural areas, both highway and bus networks suffer from limited capacity. Without major interventions, it is unlikely that these networks will be able to cater for significant increases in traffic volumes without worsening congestion and lengthening journey times.
  - Likely evolution: Policy 5 of the Cambridge Local Plan and Policy TI/2 of the South Cambridgeshire Local Plan support the aim of achieving an integrated

community connected by a sustainable transport system in Greater Cambridge. The new Local Plan presents the opportunity to address further the issue of car dependency especially within South Cambridgeshire. This can be achieved by promoting sustainable and active transport (based on sufficient population densities), sustainable development locations, and integrating new and more sustainable technologies, as new development is to be provided in Greater Cambridge.

- Relevant SA objectives: SA objective 12, SA objective 13

- Key issues: Greater Cambridge does not presently contain any AQMAs. However, air quality within the central part of Cambridge City and along the main roads is notably poorer than in other parts of the plan area. Additional development within Greater Cambridge has the potential to exacerbate existing air quality issues within Greater Cambridge and could have impacts on AQMAs in neighbouring authorities (including Huntingdon AQMA within Huntingdonshire Districtl). Similarly, there is potential for a cumulative impact of development in neighbouring authorities alongside development in Greater Cambridge to have impacts on air quality in Greater Cambridge.
  - Likely evolution: Policy 36 in the Cambridge Local Plan and Policy SC/12 in the South Cambridgeshire Local Plan seek to minimise air pollution protect air quality as well as promote sustainable transport in the District. Without the new Local Plan, development may be located in less sustainable locations that increase reliance on car use, which is likely to increase air pollution. Recent national policies and the emergence of new technologies are likely to improve air quality, for example, through cleaner fuels/energy sources. Nonetheless, the new Local Plan provides an opportunity to contribute to improved air quality in Greater Cambridge through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations.
  - Relevant SA objectives: SA objective 13

Land and Water Resources

Policy Context

International

B.221 Declaration on Climate, Relief, Recovery and Peace (COP28 Declaration) (2023) **[See reference** 239**]**: International commitment to address the complex

challenges posed by climate change, particularly in the most vulnerable regions. Although non-binding and outside the formal UNFCCC negotiations, this declaration unites the concerns and proposed solutions of countries and institutions across humanitarian, development, climate, and peace sectors. It aims to urgently enhance climate resilience in vulnerable communities that are most affected by climate-related conflicts and crises.

B.222 Convention on Biological Diversity (2022) [See reference 240]: COP15 Kunming-Montreal adopted the "Kunming-Montreal Global Biodiversity Framework" (GBF), including four goals and 23 targets for achievement by 2030.

B.223 The Glasgow Pact (UN Framework Convention on Climate Change, 2021) [See reference 241]: The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing $100 billion annually from developed to developing countries. And they collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

B.224 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) [See reference 242]: International commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

B.225 The 2030 Agenda for Sustainable Development (2015) [See reference 243]: This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 6: Clean Water and Sanitation
- SDG 14: Life Below Water.
- SDG 15: Life on Land.

B.226 The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) [See reference 244]: Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

National plans and programmes (beyond the NPPF) of most relevance to the Local Plan

B.227 The Land Use Framework for England (2026) **[See reference** 245**]** sets out England's first national framework for using land more effectively to meet competing demands for housing, infrastructure, food production, clean energy, nature recovery and climate resilience. It provides a long-term vision for 2030 and 2050, supported by spatial analysis showing that England has enough land to deliver these objectives if land is used more efficiently and multifunctionally. The Framework is not intended to prescribe specific land uses or replace the planning system, but to inform better decisions through four principles: multifunctionality, right use/right place, future-ready decisions, and adaptive design. It commits government to improving national, regional and local spatial coordination; creating a Defra Land Use Unit and a single map of national spatial priorities; aligning land use data with infrastructure, environmental and planning priorities; supporting multifunctional land management; and making land data more accessible and digital. The overarching aim is to reduce trade-offs between development, food security and environmental recovery, while increasing resilience to climate change and supporting sustainable economic growth.

B.228 Water Management Plan 2025 to 2026 (2026) **[See reference** 246**]** sets out the Department for Work and Pensions' approach to reducing water consumption, improving water efficiency and mitigating environmental impacts across its estate. The plan supports the Greening Government Commitments and aims to reduce potable water consumption by at least 3% from 2025 to 2026 levels, with a specific target to reduce water demand across the DWP estate by 5% by 2030. It establishes baseline water use of 308,258m³ in 2024/25 and outlines measures including automated meter reader installation by March 2027, monthly consumption monitoring, leak detection procedures, water audits, behavioural change campaigns, and targeted retrofit of water-saving devices such as flow restrictors, dual flush cisterns, PIR urinal controls, low-flow shower heads and efficient white goods. The plan also evaluates non-potable water use, nature-based solutions and the Waterwise Checkmark, but concludes these are not currently suitable or proportionate across the leasehold estate. The overarching aim is to embed water stewardship into DWP estate operations, facilities management and procurement, while reducing operational costs and supporting a more resilient, resource-efficient public estate.

B.229 The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025) **[See reference** 247**]** provides a strategic blueprint for managing England's long-term water needs. It emphasises the twin imperatives of securing resilient water supplies to support housing, energy, food production, economic growth, and a thriving natural environment, while safeguarding

ecosystems through sustainable abstraction and nature-based solutions. The Framework projects significant pressures on water resources driven by climate change, population growth, and emerging industrial demands, forecasting a shortfall of up to 5 billion litres per day by 2055. It calls for integrated, multi-sector planning across national, regional, and local levels, combining demand management (such as leakage reduction and efficiency improvements) with development of new infrastructure and environmental enhancements.

B.230 Environmental Improvement Plan (2025) **[See reference** 248**]** is a long-term delivery plan made up of five inter-related chapters setting out ten goals, commitments and actions in relation to the natural environment. The plan sets out how they will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the Plan is achieving "restored nature", including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

B.231 The waste prevention programme for England: Maximising Resources, Minimising Waste (2023) [See reference 249**]**: Sets out government's priorities for managing resources and waste, in line with the resources and waste strategy for England.

B.232 25 Year Environment Plan: progress reports (2025) **[See reference** 250**]**: Sets out the progress made in improving the environment through the 25 Year Plan and the indicator framework, which contains 66 indicators arranged into 10 broad themes.

B.233 Establishing the Best Available Techniques for the UK (UK BAT) (2022) [See reference 251**]**: Sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

B.234 National Chalk Streams Strategy Chalk (2022) [See reference 252**]:** Built around the "trinity of ecological health": water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

B.235 The Environment Act 2021 [See reference 253]: Sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

B.236 Waste Management Plan for England (2021) [See reference 254]: Provides an analysis on the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

B.237 Managing Water Abstraction (2021) [See reference 255]: The overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.238 The Waste (Circular Economy) (Amendment) Regulations (2020) [See reference 256]: Amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. The regulations set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The regulations also set out when waste management plans and in waste prevention programmes are required. They focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

B.239 Meeting our future water needs: a national framework for water resources (2020) [See reference 257]: Sets the strategic direction for long term regional water resources planning. The framework is built on a shared vision to:

- leave the environment in a better state than we found it
- improve the nation's resilience to drought and minimise interruptions to all water users

B.240 The Clean Air Strategy (2019) [See reference 258]: Sets out the comprehensive action that is required from across all parts of Government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.241 The Road to Zero (2018) [See reference 259]: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.242 Our Waste, Our Resources: A strategy for England (2018) [See reference 260]: Aims to increase resource productivity and eliminate avoidable waste by 2050. The strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.243 The Environment Agency's Approach for Groundwater Protection (2018) [See reference 261]: Contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. Many of the approaches set out in the position statements are not statutory but may be included in, or referenced by, statutory guidance and legislation.

B.244 The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017) [See reference 262]: Protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the need to prevent deterioration of waterbodies and to protect, enhance and restore waterbodies with the aim of achieving good ecological and chemical status.

B.245 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017) [See reference 263]: Sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles, a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help Local Authorities to prepare Air Quality Action Plans and improve air quality, an £89

million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.246 Drought response: our framework for England (2017) [See reference 264]: Sets out how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

- how drought affects different parts of England
- who is involved in managing drought and how we work together
- how the Environment Agency and others take action to manage drought
- how the Environment Agency monitors and measures the impacts of drought to advise senior management and government on the prospects and possible action
- how the Environment Agency reports on drought and communicates with others.

B.247 The Nitrate Pollution Prevention Regulations (2016) [See reference 265]: Provide for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. The also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

B.248 The Water Supply (Water Quality) Regulations (2016) [See reference 266]: Focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

B.249 The Environmental Permitting Regulations (2016) [See reference 267]: Streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

B.250 The Air Quality Standards Regulations (2016) [See reference 268]: Set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

B.251 National Planning Policy for Waste (NPPW) (2014) [See reference 269]: Identifies key planning objectives, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns
- Provide a framework in which communities take more responsibility for their own waste
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

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- Provide a framework in which communities take more responsibility for their own waste
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

B.253 The Water White Paper (2012) [See reference 271]: Sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the

combined impacts of climate change and population growth on stressed water resources.

B.254 The National Policy Statement for Waste Water (2012) [See reference 272]: Sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

B.255 Safeguarding our Soils – A Strategy for England (2011) [See reference 273]: Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

B.256 Water for Life White Paper (2011) [See reference 274]: Sets out how to build resilience in the water sector. Objectives of the White Paper are to:

- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.
- Keep short and longer term affordability for customers at the centre of decision making in the water sector.
- Protect the interest of taxpayers in the policy decisions that we take.
- Ensure a stable framework for the water sector which remains attractive to investors.
- Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.
- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.

- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

B.257 Future Water: The Government's Water Strategy for England (2011) [See reference 275]: Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

B.258 Building Regulations (2010) [See reference 276]: Requires that reasonable precautions are taken to avoid risks to health and safety caused by contaminants in ground to be covered by building and associated ground.

B.259 The Urban Waste Water Treatment Regulations (2003) [See reference 277] Protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

B.260 Environmental Protection Act 1990 [See reference 278] Makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

Sub national

B.261 Cambridge Water, Water Resources Management Plan (WRMP) (2025) [See reference 279]: Describes how Cambridge Water aims to meet the demand for water in the Cambridge region, including consideration of climate change, population growth and the need to protect the environment. The WRMP recognises the increased demand for water due to a growing population, the potential for adverse environmental impacts of extraction and the need to reduce water wastage.

B.262 Affinity Water and Anglian Water WRMPs (2024) [See reference 280]: To be taken into consideration as neighbouring suppliers, given that WRMPs do not operate in isolation and abstraction by one can significantly affect the environment of another.

B.263 Anglian Water's Long Term Delivery Strategy (2023) [See reference 281]: A plan to prioritise investment across the wider region to help balance supply and demand for water recycling services, considering risks from growth, climate change, severe drought, and customer behaviours.

B.264 Anglian River Basin District Flood Risk Management Plan 2021 to 2027 (2022) [See reference 282]: Explains the risk of flooding from various sources and how risk management authorities will work with communities to manage it over a period of 6 years.

B.265 Anglian River Basin Management Plan (2022) [See reference 283] : Provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning.

B.266 Greater Cambridge Integrated Water Management Study Outline Water Cycle Study (2021) [See reference 284]: Updates the Phase 1 Outline Water Cycle Strategy prepared for the previous Local Plan in 2008, providing updated evidence on water supply, wastewater treatment, and infrastructure needs to support future development in the region.

B.267 Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) [See reference 285]: Sets out key areas which will help shape the future of minerals activities. The plan includes a vision, aims and objectives for both sustainable minerals and waste development; core policies related to sustainable development and climate change, as well as providing for mineral and waste needs; policies setting out Mineral Safeguarding Areas and allocations; policies on sustainable use of minerals; allocation of waste management areas and waste recycling areas; and policies relating to transport infrastructure, design, amenity, restoration and aftercare, as well as conservation and enhancement of the natural and historic environment.

B.268 Anglian Water's Long Term Water Recycling Plan (WRLTP) (2019) [See reference 286]: A plan to prioritise investment across the wider region to help balance supply and demand for water recycling services, considering risks from growth, climate change, severe drought, and customer behaviours.

B.269 Citywide Tree Strategy 2016-2026 (2016) [See reference 287]: Aims to sustainably manage the Council's own trees and those it manages by agreement, to foster a resilient tree population that responds to the impacts of climate change and urban expansion, to raise awareness of trees being a vital community asset, through promoting continued research, through education via the provision of advice and through partnership working and to make efficient and strategic use of the Council's regulatory powers for the protection of trees of current and future value.

B.270 Cambridge City Council and South Cambridgeshire District Council Infrastructure Delivery Study (2015) [See reference 288]: Assessed the infrastructure requirements, costs and known funding related to planned growth, particularly the strategic sites, and identified any phasing issues that might have affected the proposed growth and advise on the future delivery of infrastructure needed to support the planned growth. A new infrastructure delivery plan is being prepared for the emerging Greater Cambridge Local Plan.

B.271 South Cambridgeshire Recreation and Open Space Study (2013) [See reference 289]: Aims to provide an audit of the quantity and quality of existing provision in the district, assess the need for future provision. An updated open space study is currently being prepared.

B.272 Cambridgeshire Green Infrastructure Strategy (2011) [See reference 290]: Highlights the issue of air quality in particular and how this can be addressed through Green Infrastructure (GI) provision. It also notes that water is an important element of GI and that management of GI assets can be conducive to improving or maintaining good water quality. A new GI Strategy is being prepared for the new Greater Cambridge Local Plan.

B.273 Cambridge Open Space and Recreation Strategy (2011) [See reference 291] : Discusses the findings of the Open Space and Recreation Assessment. It breaks the information down by ward and provides data on the deficits in each ward and the ward's strengths and weaknesses in terms of open space provision. It also discusses the level of provision proposed in the urban extensions to the City, which have not been assessed in this Strategy as they have not yet been delivered on site. An updated open space strategy is currently being prepared.

B.274 Cambridge Area Water Cycle Strategy - Phase 1 (2008) and Phase 2 (2011) [See reference 292]: Provides an evidence base concerning the required water services infrastructure for planned development in the Cambridge Sub-Region (CSR). The Phase 1 study identified no insurmountable technical constraints to the proposed level of growth, but identified a number of important issues including the need for a Surface Water Management Plan, a detailed analysis of increased flood risk at the Swavesey Drain, and the need to investigate the viability of achieving 'water neutrality'. Phase 2 goes further and supports a more aspirational vision for water management, including aspirations to water neutrality, improving biodiversity and sustainable surface water management. In addition, a further dedicated Water Cycle Strategy (WCS) was developed in 2014 for the allocated strategic development site at Denny St Francis, north of the existing town of Waterbeach. An updated Water Cycle Study has been prepared by both Councils for the emerging Greater Cambridge Local Plan.

B.275 Catchment Abstraction Management Plans [See reference 293]: Used by the Environment Agency to manage water resources in England, which test the availability of water at four different levels of 'flow'. The most relevant strategies for the plan area are:

- Cam and Ely Ouse Catchment: This strategy covers the largest part of the plan area, particularly in the east and including Cambridge. It highlights that at the three lowest 'flows', water is largely 'not available', and at the highest flow level water is 'restricted'.
- Upper and Bedford Ouse Catchment: This strategy covers a small part of the west of the plan area. At the two lower 'flows' tested, water was 'not available' and was restricted at the third lowest 'flow'.
- Essex Catchment: the strategy highlights that water is 'not available' across large parts of the catchment area, however this only affects a small part of the south of the plan area for Greater Cambridge.

B.276 Cambridge City Council Contaminated Land Strategy (2009) [See reference 294]: Builds upon the City Council's Medium Term Objectives which include:

- To promote Cambridge as a sustainable city, in particular by reducing carbon dioxide emissions and the amount of waste going into landfill in the City and sub-region.
- Ensure that residents and other service users have an entirely positive experience of dealing with the Council.
- Maintain a healthy, safe and enjoyable city for all, with thriving and viable neighbourhood.
- Lead the growth of Cambridge to achieve attractive, sustainable new neighbourhoods, including affordable housing, close to a good range of facilities, and supported by transport networks so that people can opt not to use the car.

B.277 South Cambridgeshire Contaminated Land Strategy (2001) [See reference 295]: Sets out South Cambridgeshire District Council's strategy on how it proposes to identify contaminated land within its boundaries. It supports the following objectives:

- Maintaining, improving and developing sympathetically the character, environment, economy and social fabric of our villages.

- Promoting a healthier environment to enable our communities to lead healthier lives, by its own actions and active partnership with others.
- Working towards a more sustainable future for everyone living and working in South Cambridgeshire, balancing the needs of the present and future generations.

Current Baseline

B.278 Rather than addressing issues such as soil, geology and water as isolated topics, it is important than an integrated view is adopted based on the 'natural capital' concept – often defined as the world's stock of natural assets (including geology, soil, air water and all living things), from which humans derive a wide range of 'ecosystem services'. It is important that the approach to the issues below in any development plan is done in a holistic, integrated way.

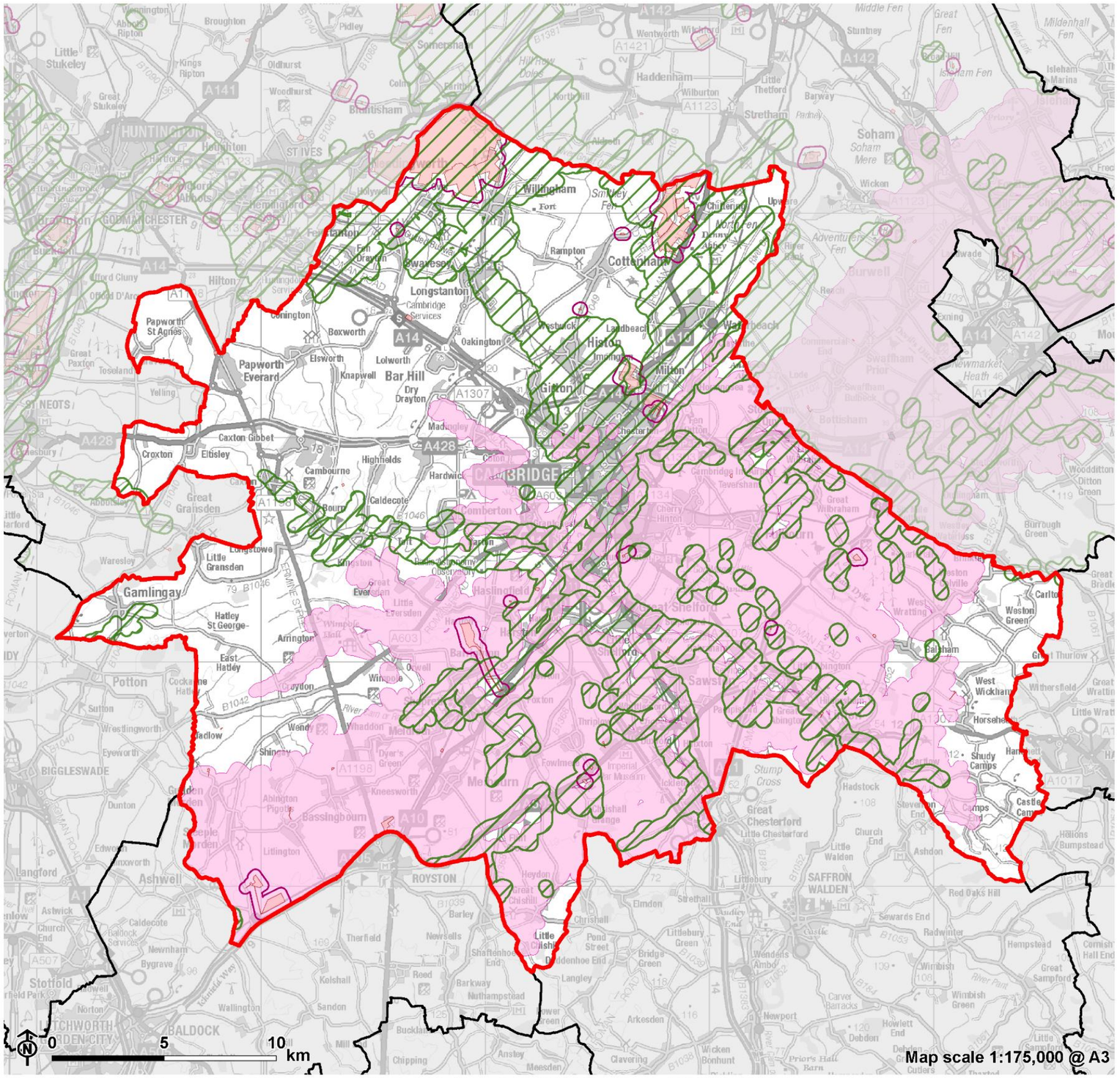
Geology and minerals

B.279 A variety of mineral resources are found in the Greater Cambridge Local Plan area: sand, gravel, limestone, chalk, chalk marl and clay. There are extensive deposits often occurring under high quality agricultural land or in areas valued for their biodiversity and landscapes, e.g. river valleys **[See reference 296]**. As shown in Figure B.6, much of Greater Cambridge is covered by Mineral Safeguarding Areas, particularly the central, southern and eastern areas. There are also seven Mineral Consultation Areas (MCAs) within Greater Cambridge. There are also a small number of minerals site allocations, which are extensions to existing minerals sites. The mineral resource of primary interest for Cambridgeshire & Peterborough is sand and gravel and crushed rock aggregate (limestone). Sand and gravel resources occur mainly within superficial or 'drift' deposits, subdivided into river sand and gravel, glacial deposits, head deposits and bedrock sand. There are sand and gravel deposits around Cambridge City, particularly to the north but also stretching out into the southern part of the plan area. There are also deposits of chalk in the southern and eastern parts Greater Cambridge **[See reference 297]**.

B.280 Cambridgeshire and Peterborough has limited resources of rock suitable for crushed rock aggregate. The Lincolnshire Limestone Formation (inferior oolite) crops out in the north-west of the Plan area, west and north-west of Peterborough. None of the limestone is worked for building stone within the Plan area. Owing to its relatively low strength and its poor resistance to frost it is generally used as constructional fill or as sub-base roadstone material. To the south of the Plan area closer to

Cambridge the Upware Limestone is quarried on a small scale for use as an agricultural lime and asphalt filler **[See reference 298]**.

Figure B.6: Mineral Safeguarding Areas



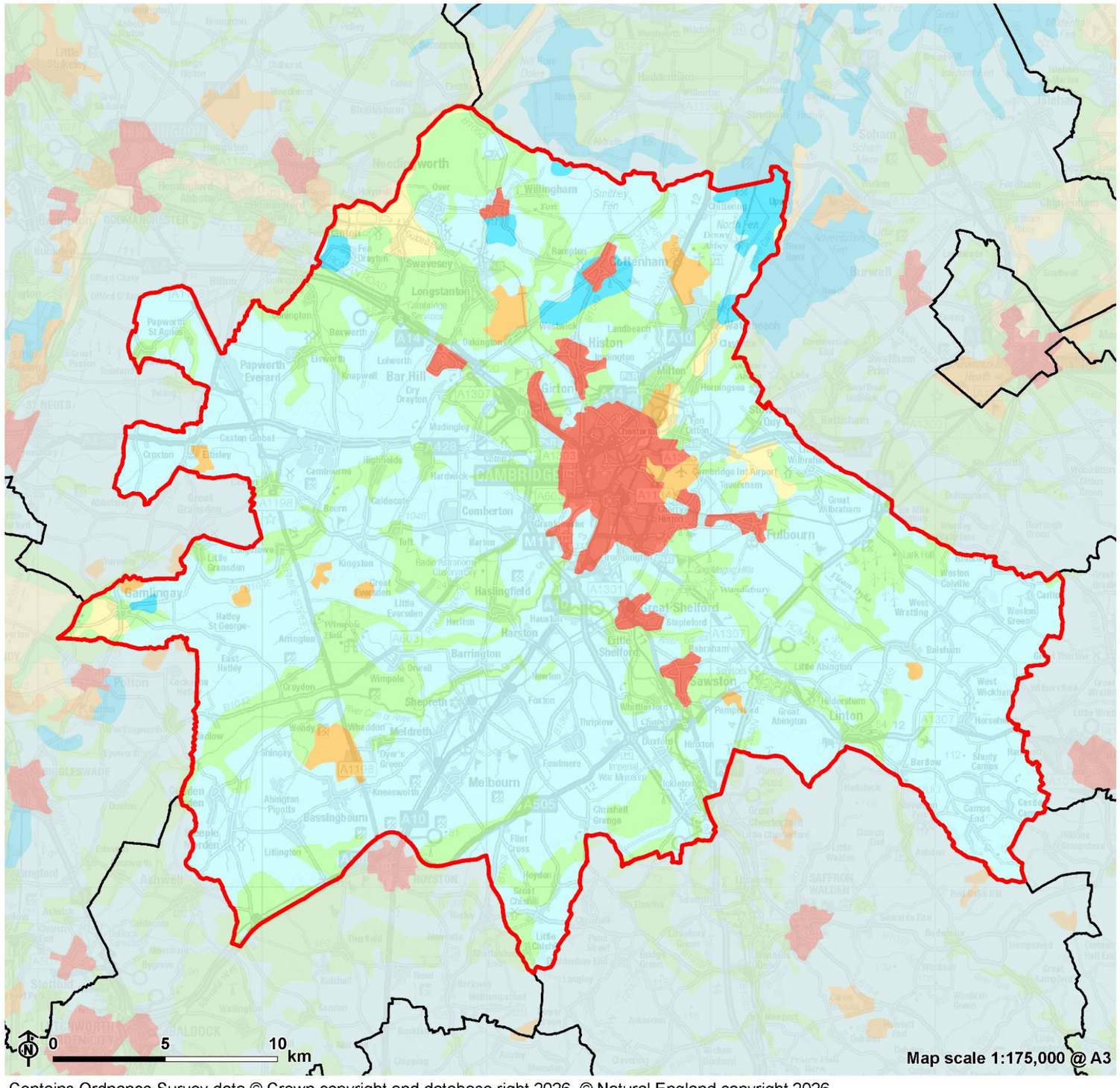
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Soils

B.281 Cambridgeshire has one of the largest areas of high-grade agricultural land in the UK, as shown in Figure B.6. The majority of land in Greater Cambridge is Grades 1, 2 and 3, with small areas designated as urban and non-agricultural, almost entirely the City of Cambridge. Grade 1 and Grade 2 agricultural land represent the best and most versatile land for farming, along with Grade 3a agricultural land (the national maps of agricultural land classification do not distinguish between Grade 3a and Grade 3b agricultural land).

B.282 Within DEFRA's 25 Year Environment Plan, a strategy for the restoration of peatland areas in England was outlined as a priority action. There are around 682,230 ha of peatland in England. Cambridgeshire's peatlands - the Fens - account for around 70% of wasted (damaged) peatland in the country - around 27% of England's total peatland stock. When peatlands are in good condition they can act as stores of carbon, but when damaged they can emit vast quantities of carbon. However poor, damaged peatland is known as "wasted peat" emits these huge quantities of carbon back into the atmosphere **[See reference** 299**]**. Pilot projects will be undertaken including the East Anglian Fens Peat Pilot which will work with internal drainage boards to look at water flows on and around the fens. It will also bring in long-term sustainability of peat management opportunities which will assist with the creation of the Lowland Agricultural Peat Taskforce. The Cambridgeshire Fens include a significant proportion of the East Anglian Fen peat and the pilot project will work with internal drainage boards to look at water flows on and around the fens. England's remaining lowland peat provides a crucial tool in helping to mitigate climate change and achievement of the government's aim to reach net zero emissions by 2050 **[See reference 300]**.

Figure B.6: Agricultural land classification



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Contaminated Land

B.283 For a site to meet the definition of contaminated land, a pollutant linkage must be established. A pollutant linkage consists of three parts: a source of contamination in, on or under the ground, a pathway by which the contaminant is causing significant harm or harm, (or which presents a significant possibility of such harm being caused) and a receptor of a type specified in the regulations **[See reference 301]**. Two entries were added to the South Cambridgeshire District Council's Contaminated Land Register in 2003 and 2010. However, both have now been remediated **[See reference 302]**. Similarly, four sites were added to Cambridge County Council's Contaminated Land Register in 2020 and all have been fully remediated **[See reference** 303**]**.

Water

B.284 Figure B.7 shows the location of water courses and Source Protections Zones (SPZs) within Greater Cambridge. The River Cam runs through the City of Cambridge through to South Cambridgeshire from the south west to the north east. The two principal tributaries of the Cam, the Granta and the Rhee, flow through South Cambridgeshire. Greater Cambridge lies within the River Basin Management Plan for the Anglian River Basin District. Land within the plan area falls across the Broadland Rivers catchment, Cam and Ely Ouse catchment, Combined Essex catchment, East Suffolk catchment, Nene catchment, North Norfolk catchment, North West Norfolk catchment, Old Bedford including the Middle Level catchment, Upper and Bedford Ouse catchment, Welland catchment and the Witham catchment. These areas extend beyond the boundaries of the plan area to include land to the north, east and west **[See reference 304]**.

B.285 Priority issues for the Cam and Ely Ouse, Upper and Bedford Ouse and Old Bedford catchment areas include diffuse pollution, biological impacts of low flow rates and over abstraction and nutrient loading, the physical modification of water courses, invasive non-native plant and animal species, and pollution. Some of the water bodies in these catchments have been identified by the Environment Agency as having 'bad' or 'poor' ecological status, but none have been identified as having 'bad' chemical status **[See reference 305]**. There are also Source Protection Zones scattered throughout Greater Cambridge. Over-abstraction of water is a key issue. In 2021, the Cambridge Water operating area was declared as an area of serious water stress by the Environment Agency. The Cambridge Water Company's Water Resources Management Plan (WRMP) shows that beyond 2035, without additional resources or greater efficiency, the need for water to serve development will be

greater than the current available supply. The Plan proposed a demand management programme which will deliver an 18.26Ml/d reduction in demand by 2049/50. This will largely offset the growth in demand associated with population increases in the region. The Plan also sets further measures to ensure that Cambridge Water will be able to balance supply and demand in the region up to and beyond 2045 **[See reference** 306**]**.

B.286 In August 2019 the Chair of Natural England raised concerns over the levels of stress on the River Cam in particular, which is said to be under threat from low rainfall and abstraction of groundwater for public supply. Given the prospect of increased demand from development locally, the Chair of Natural England suggested that major new reservoirs may be required in future to counter the stress **[See reference 307]**. It is recognised that water abstraction and conveyance issues operate at a regional scale and do not follow either local authority or water company boundaries, raising the need to enact the 'duty to cooperate' across these boundaries.

B.287 It should be recognised that there is a close relationship between the availability of water resources and water quality in a region like Greater Cambridge, given that lower dilution in the watercourses can lead to the need to treat wastewater to a higher standard. There are existing proposals for a new and relocated wastewater treatment works for Cambridge, however plans must take into account any potential short or long-term shortfalls in capacity, given projected growth in the area.

B.288 A Regional Water Resources Plan was published by Water Resources East in December 2023 **[See reference** 308**]**. The Plan covers the period 2025 to 2050, outlining the needs of different sectors for water in the region now and in the future. The Plan is clear that "unless urgent action is taken by all sectors, the region will face severe water shortages. This will constrain agricultural production and curtail economic growth, affecting the region's prosperity and endangering the east's iconic chalk rivers, peatlands and wetlands."

B.289 The main proposals in the Regional Water Resources Plan are set in the context of a considerable reduction in abstraction licenses by the Environment Agency in Greater Cambridge, first to prevent further deterioration and then to restore the water environment, focusing first on protected sites. Further demand management measures and considerable expansion in supply capacity are also needed. The Regional Plan proposes a water transfer arrangement from Anglian Water to Cambridge Water in the medium term (from around 2030) and the delivery of a new Fens Reservoir in the long term (expected to be operational from around 2035-37 but not yet progressed to planning permission stage).

B.290 The Regional Water Resources Plan advises that it is possible that water companies could look to seek a delay to licence cap reductions until later in the 2030s due to an overriding public interest case in providing secure water supplies. This is allowable under Regulation 19 of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. However, at this point in time, it is not clear whether Cambridge Water will need to go down the route of seeking such a delay in reduction of abstraction, and even if they did, whether it would be successful.

B.291 Cambridge Water Company's WRMP outlines a long-term strategy to secure a sustainable water supply while supporting the region's housing and employment growth needs **[See reference** 309**]**. Key measures include a 50% reduction in leakage by 2050 (with a 20% reduction by 2030), promoting household water efficiency to 110 litres per person per day, and implementing universal smart metering. Additionally, the plan prioritises new sustainable water sources, including Grafham Water and the new Fens Reservoir, to enhance resilience and ensure sufficient water availability for the region's expanding population and economic development. Planning for several different supply options is set out. This includes:

- Taking water from a source at Fenstanton, an existing underground water source that has not been used in recent years and requires a full refurbishment. This could provide up to 1 million litres of water a day in an environmentally sustainable way.
- Taking water from Grafham reservoir in Anglian Water's operating area in what is known as a bulk water transfer. This will provide around 26 million litres of water a day from 2032 onward and will provide a temporary source of water until the completion of the Fens Reservoir.
- A new reservoir in partnership with Anglian Water in the Cambridgeshire Fens. This will provide up to half of all water needs (around 44 million litres of water a day) when it is brought into commission in 2036/37.

B.292 An updated Outline Water Cycle Study was prepared in August 2021 by both Councils for the emerging Greater Cambridge Local Plan **[See reference** 310**]**. The Study updates the Phase 1 Outline Water Cycle Strategy prepared for the previous Local Plan in 2008, providing updated evidence on water supply, wastewater treatment, and infrastructure needs to support future development in the region. The Study highlights that the primary demand on water resources in Greater Cambridge is for public water supply, with the area falling within the Cambridge Water supply zone, which also includes parts of Huntingdonshire. Water supply in this zone relies entirely on groundwater abstraction, primarily from the Chalk aquifer (97%), with a smaller portion (3%) from greensand aquifers.

B.293 A key issue identified in the study is that the current level of groundwater abstraction is unsustainable, leading to poor groundwater and river health and negatively affecting the chalk stream environment, which is of international importance. Additionally, Greater Cambridge is not a water-neutral region, relying on water imports from outside its administrative boundary, particularly from Thetford and surrounding areas. Any increase in water demand could have wider regional environmental impacts, limiting future abstraction.

B.294 The study acknowledges that planned strategic investments - in collaboration with Cambridge Water, Water Resources East, and Anglian Water - aim to introduce new sustainable water resource options by the mid-2030s. These investments are expected to reduce groundwater abstraction to sustainable levels, improve river health, increase climate resilience, and support population and housing growth.

B.295 In assessing potential housing growth scenarios, the study determined that:

- A high-growth scenario (57,000 dwellings) would likely be unsustainable due to water resource constraints.
- A medium-growth scenario (42,000 dwellings) could be accommodated if short-term water solutions were implemented before long-term infrastructure improvements in the 2030s.
- The preferred development strategy (48,794 dwellings) requires greater emphasis on water efficiency measures and early intervention strategies to ensure sustainable water supply.

B.296 Given the scarcity of water in the catchments serving Greater Cambridge, protecting water resources from pollution and contamination will be important. In some cases, development can be part of the solution to remediating both land and water affected Given the scarcity of water in the catchments serving Greater Cambridge, protecting water resources from pollution and contamination will be important. In some cases, development can be part of the solution to remediating both land and water affected by a legacy of pollution. However, in some cases the contamination will be particularly acute and may require proactive planning solutions.

B.297 A breakdown of the number of water courses in the wider Anglian River Basin District which have achieved various ecological and chemical classifications is provided in Table B.3. For Greater Cambridge, the reasons for not achieving good status and reasons for deterioration in water quality are mainly agriculture and rural land management or related to the water industry.

Table B.3: Ecological and Chemical Classification for surface waters in the Anglian River Basin District [See reference **311**]

	Chemical status or potential					**Chemical status**	
Number of water bodies	Bad	Poor	Moderate	Good	High	Fail	Good
599	21	103	428	47	0	599	0

Figure B.7: Watercourse and Source Protection Zones in Greater Cambridge (SPZs)

Regulation 19 Sustainability Appraisal
Cambridge City Council and South Cambridgeshire District Council

LUC

Figure B.8 : Watercourses and Source Protection Zones in Greater Cambridge

Greater Cambridge boundary
Neighbouring local authority
Watercourse

Source protection zone

Zone I - inner protection zone
Zone II - outer protection zone
Zone III - total catchment

0 5 10 km

Map scale 1:175,000 @ A3

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Key Sustainability issues for Greater Cambridge and likely evolution without the Local Plan

- Key issues: The majority of Greater Cambridge contains best and most versatile agricultural land with a mix of classified agricultural land, Grades 1, 2 and 3. New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.
    - Likely evolution: The Cambridge Local Plan seeks to safeguard the best and most versatile agricultural land within and on the edge of the City through Policy 8. Within the South Cambridgeshire Local Plan, Policy NH/3ensures no development will be granted if it leads to the irreversible loss of Grade 1, 2 and 3a agricultural land. Furthermore the NPPF supports the re-use of brownfield land and states that planning policies and decisions should contribute to and enhance the natural and local environment by “recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”. The new Local Plan provides an opportunity to strengthen the approach and ensure these natural assets are not lost or compromised. This may involve the prioritisation of use of brownfield sites and lower quality agricultural land for development.
    - Relevant SA objectives: SA objective 8
- Key issues: The Greater Cambridge contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.
    - Likely evolution: Without the new Local Plan it is possible that development could result in unnecessary sterilisation of mineral resources which would mean they are not available for future generations to use. Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan addresses proposals for non-mineral development within the Minerals Safeguarded Areas.
    - Relevant SA objectives: SA objective 9
- Key issues: Some of the water bodies which flow through Greater Cambridge have been identified by the Environment Agency as having ‘bad’ or ‘poor’ ecological status. All water bodies in the plan area have ‘fail’ chemical status. There are also areas in Greater Cambridge which are covered by a Source Protection Zone.

- Likely evolution: Without the new Local Plan it is possible that un-planned development could be located in areas that will exacerbate existing water quality issues, although existing safeguards, such as the EU Water Framework Directive, would provide some protection. Development which occurs within Source Protection Zones presents the risk of contamination from any activities that might cause pollution in the area. Policy 7 of the Cambridge Local Plan aims to raise the water quality and enhance the natural resources of the River Cam. Policy CC/7 of the South Cambridgeshire Local Plan aims to ensure that sufficient capacity in the existing local infrastructure is provided to meet the additional requirements arising from new development, that the quality of water bodies will not be harmed and the delivery of mitigation which would help to prevent water quality issues emerging. The new Local Plan will provide the opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment. It will also provide further certainty in terms of planning for adequate wastewater infrastructure to address development requirements over the plan period.
- Relevant SA objectives: SA objective 10

- Key issues: The plan area is within an area of serious water stress. Over-abstraction of water in this region is a key issue, and urgent action is required now to ensure the availability of water for future uses, including potable water supply and food production, without having a detrimental impact on the environment, as low rainfall and over abstraction in rivers is causing serious concern. This is likely to be exacerbated by the effects of climate change, and it should be noted that there is significant cross-over between water resource availability and water quality.
  - Likely evolution: Without the new Local Plan it is possible that un-planned development could be located in areas that will exacerbate the water stress issue within the sub-region, although Cambridge Water's WRMP sets out measure to ensure that supply and demand in the region can be balanced over the next 25 years and beyond. Policy 28 of the Cambridge Local Plan requires all new development to meet the minimum standards of water efficiency to address the severe water stress within the area and has set a target for water consumption of 110 litres per person per day. Policy CC/4 of the South Cambridgeshire Local Plan requires all new residential development to achieve a minimum water efficiency equal to 110 litres per person per day. The new Local Plan has the potential to secure long term sustainable development, which will be essential in ensuring that all new development implement water efficiency standards, and that the phasing of new development is in line with any implementation timescales for any new

strategic schemes that water companies might require. It will also be better placed to take an up-to-take approach to climate change adaptation, based on up-to-date evidence.

- Relevant SA objectives: SA objective 10

Climate Change Adaptation and Mitigation

Policy Context

International

B.298 Declaration on Climate, Relief, Recovery and Peace (COP28 Declaration) (2023) **[See reference** 312**]**: International commitment to address the complex challenges posed by climate change, particularly in the most vulnerable regions. Although non-binding and outside the formal UNFCCC negotiations, this declaration unites the concerns and proposed solutions of countries and institutions across humanitarian, development, climate, and peace sectors. It aims to urgently enhance climate resilience in vulnerable communities that are most affected by climate-related conflicts and crises.

B.299 Convention on Biological Diversity (2022) **[See reference** 313**]**: COP15 Kunming-Montreal adopted the “Kunming-Montreal Global Biodiversity Framework” (GBF), including four goals and 23 targets for achievement by 2030.

B.300 The Glasgow Pact (UN Framework Convention on Climate Change, 2021): Nations adopted the Glasgow Climate Pact **[See reference** 314**]**. The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing $100 billion annually from developed to developing countries. And they collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

B.301 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) **[See reference** 315**]**: International commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

B.302 United Nations Paris Climate Change Agreement (2015): International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

B.303 The 2030 Agenda for Sustainable Development (2015) [See reference 316]. This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SGD 7: Affordable and Clean Energy.
- SDG 11: Sustainable Cities and Communities.
- SDG 12: Responsible Consumption and Production.
- SDG 13: Climate Action.
- SDG 14: Life Below Water.
- SDG 15: Life on Land.

B.304 The United Nations Declaration on Forests (New York Declaration) (2014) **[See reference 317]**: Sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

National plans and programmes (beyond the NPPF) of most relevance to the Local Plan

B.305 Clean Energy Industries Sector Plan (2025) **[See reference 318]** is the UK government's strategic initiative, under the Modern Industrial Strategy, to position the nation as a global leader in frontier clean energy technologies by 2035. The plan sets out an ambition to double investment across key clean energy industries, such as wind (onshore, offshore, floating), nuclear fission, fusion, hydrogen, carbon capture, usage and storage (CCUS), greenhouse gas removals, and heat pumps, to over £30 billion per year, while continuing to support other vital technologies like solar, long-duration energy storage and bioenergy. It aims to catalyse private sector engagement by deploying targeted public investment, including more than £8.3 billion through Great British Energy and Great British Energy-Nuclear up to 2029 and a Clean Energy Supply Chain Fund, and by reducing barriers to investment, thereby providing industry certainty and encouraging deployment and innovation.

B.306 The Hydrogen Update to the Market (2025) **[See reference 319]** provides a detailed overview of the UK's hydrogen policy progress UK's and outlines forthcoming opportunities as part of the government's Clean Energy Superpower and

Growth Missions. Significant investment commitments include over £500 million allocated toward developing the first regional hydrogen transport and storage network, aiming for operation by 2031, supported by a forthcoming Hydrogen to Power Business Model in 2026. The report highlights plans to abolish Climate Change Levy charges on electricity used in hydrogen electrolysis, regulatory and sector development initiatives, including skills and infrastructure planning, and signals the intent to publish a comprehensive UK Hydrogen Strategy in autumn 2025.

B.307 The Onshore Wind Strategy (2025) **[See reference** 320**]** presents the country's first dedicated strategy to accelerate onshore wind deployment as a key component of its Clean Power 2030 mission. The strategy sets a target of deploying 27-29 GW of onshore wind capacity across Great Britain by 2030, significantly increasing from existing capacity of over 16 GW, and backed by over 40 actions to tackle barriers such as planning delays, aviation and defence conflicts, grid access, and community engagement. New measures include the creation of an Onshore Wind Council to oversee implementation, potential expansion of the Clean Industry Bonus to support UK-based supply chains, workforce and skills development initiatives, and a programme to repower ageing turbines while smoothing the consenting and survey process for new projects. The strategy also outlines mechanisms to ensure community benefit through up to £70 million annually (£5,000 per MW) in local investment, while projecting creation of up to 45,000 direct and indirect jobs by 2030. The overarching aim is to deliver affordable, home-grown renewable energy, reduce reliance on volatile gas markets, and bolster energy security through rapid onshore wind expansion.

B.308 Carbon Budget and Growth Delivery Plan (2025) **[See reference** 321**]** sets out how the government will meet its statutory carbon budgets and secure the benefits of this transition for people and businesses. The plan sets out a package of quantified and unquantified proposals and policies and associated timescales and delivery risks. This includes actions around energy security and lower bills, such as incentivising new clean electricity generating projects in Great Britain.

B.309 State of the UK Climate (2024) [See reference 322**]**: The tenth in the annual series of reports that provide a summary of the UK weather and climate through the calendar year 2023, alongside the historical context for a number of essential climate variables. It provides an accessible, authoritative and up-to-date assessment of UK climate trends, variations and extremes based on the most up to date observational datasets of climate quality.

B.310 The Carbon Budget Delivery Plan (2023) [See reference 323**]**: Explains how the government intends to meet its legally-binding climate goals, setting out a

package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- wider matters in connection with carbon budgets
- the contribution of these proposals and policies to sustainable development
- the impact the package has on sectors of the economy

B.311 Powering up Britain (2023) [See reference 324]: A collection of policy documents relating to climate change, setting out the department's approach to energy security and net zero.

B.312 Powering up Britain includes four key areas of action:

- decarbonising electricity generation;
- improving energy efficiency;
- electrifying transport;
- and developing low-carbon heating

B.313 The Energy Security Plan (2023) [See reference 325]: Sets out the steps that the government is taking to improve the UK's energy system resilience, particularly in the current geopolitical context. Key commitments include:

- Looking at the role gas storage and other sources of flexibility can play in gas security.
- Delivery of energy efficiency upgrades through the Great British Insulation Scheme.
- Extension of the Boiler Upgrade Scheme to 2028.
- Setting up Great British Nuclear to lead delivery of the new nuclear programme.
- Launching a competitive process to select the best Small Modular Reactor technologies.
- Launching the Floating Offshore Wind Manufacturing Investment Scheme, to provide up to £160 million investment in port infrastructure projects.
- Publishing action plans on reducing the development time for transmission network projects and on accelerating electricity network connections.
- Announcing the Track-1 negotiation project list of carbon capture usage and storage (CCUS) projects; launching a process to expand Track-1 clusters; and establishing two further (Track-2) CCUS clusters.

- Announcing a shortlist of projects for the first electrolytic hydrogen production allocation round.
- Announcing successful applicants of the first competition window for Strands 1 and 2 of the Net Zero Hydrogen Fund (development and capital co-funding) and launching a second competition window.
- Consulting on revised energy National Policy Statements which underline the national need for new energy infrastructure with the intention of expediting planning processes.

B.314 The Net Zero Growth Plan (2023) **[See reference** 326**]**: Outlines the Government's plans to reach net zero and unlock the financial benefits that this can bring. Key commitments include:

- Publishing an addendum to the Resources and Waste Strategy which will focus on net zero and include a plan to achieve the near elimination of biodegradable municipal waste going to landfill.
- Responding to the consultation on a revised Waste Prevention Programme for England alongside the new programme 'Maximising Resources, Minimising Waste'.
- Providing up to £20 billion of funding for early deployment of CCUS to unlock private investment and jobs.
- Consulting on an ambitious Zero Emission Vehicle mandate; publishing the Low Carbon Fuels Strategy in 2023; and legislating to include recycled carbon and nuclear derived fuels in renewables transport fuel schemes.
- Consulting on transition planning disclosure requirements for the UK's largest companies and the UK Green Taxonomy, as well as on steps and interventions needed to support the growth of high integrity voluntary markets and to protect against greenwashing.
- Introducing a regulatory framework for heat networks; beginning the implementation of heat network zoning by 2025; and confirming funding of £15 million for the 2023/24 Home Decarbonisation Skills Competition and the £5 million Heat Training Grant for heat pump and heat network skills. Growth and decarbonisation of the UK heat network market will continue through the Green Heat Network Fund and the Heat Network Efficiency Scheme, including £220 million for the Heat Network Transformation Programme over 2025/6 and 2026/7.
- Considering options for integrating greenhouse gas removals in the UK Emissions Trading Scheme.

- Publishing the Biomass Strategy in 2023, which will outline the role that bioenergy with carbon capture and storage (BECCS) can play in reducing carbon emissions.
- Taking forward the next steps in the Review of Electricity Market Arrangements.

B.315 The British energy security strategy (2022) [See reference 327]: Sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aims to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas - a licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plant to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing: The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

B.316 The Environment Act 2021 [See reference 328]: Sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

B.317 The Net Zero Strategy: Build Back Greener (2021) [See reference 329]: Sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste); and
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

B.318 A Green Future: Our 25 Year Plan to Improve the Environment [See reference 330]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
  a) Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
  b) Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

B.319 The UK Hydrogen Strategy (2021) [See reference 331]: Sets out the Government's approach to developing a thriving low carbon hydrogen sector in the UK, with the ambition for 5GW of capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy.

B.320 The Industrial Decarbonisation Strategy (2021) [See reference 332]: Aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for the manufacturing and construction sector and is part of the government's path to net zero by 2050.

B.321 The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions.

B.322 Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions;
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass;
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors;
- To ensure the land planning regime is fit for building low carbon infrastructure;
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs;
- An expectation that at least 3 megatons of CO2 is captured within industry per year by 2030;
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

B.323 The Heat and Buildings Strategy (2021) [See reference 333]: Sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050.

B.324 Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant,

which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.

- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

B.325 The Energy Performance of Buildings Regulations (2021) [See reference 334]: Seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

B.326 The Energy white paper: Powering our net zero future (2020) [See reference 335]: Builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UKs energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050.

B.327 Key aims of the paper include:

- Supporting green jobs - The government aims to support up to 220,000 jobs in the next 10 years. Several will be supported via a "major programme" that will see the retrofitting of homes for improved energy efficiency and clean heat.
- Transforming the energy system - To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable - The government aims to do this by making the energy retail market "truly competitive". This will include offering people a simple method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle "loyalty penalties".
- Generating emission-free electricity by 2050 - The government aims to have "overwhelmingly decarbonised power" in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme - The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.

- Exploring new nuclear financing options - The government said it is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind - The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments - Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy - The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points- The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars, including for the mass-production of the batteries needed for electric vehicles.
- Supporting the lowest paid with their bills - The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400. This includes extending the Warm Home Discount Scheme to 2026 to cover an extra three quarters of a million households and giving eligible households £150 off their electricity bills each winter.
- Moving away from fossil fuel boilers - The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition - The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.

B.328 HM Treasury, National Infrastructure Strategy: Fairer, faster greener (2020) **[See reference** 336**]** – sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. This will be enabled by clear support for private investment and through a comprehensive set of reforms to the way infrastructure is delivered.

B.329 The Sixth Carbon Budget report (2020) [See reference 337]: Based on an extensive programme of analysis, consultation and consideration by the Committee and its staff, the report builds on the evidence published last year for their Net Zero advice. Their recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, bringing forward the UK's previous 80% target by nearly 15 years.

B.330 Decarbonising Transport: Setting the Challenge (2020) [See reference 338]: Sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.331 Flood and Coastal Erosion Risk Management: Policy Statement (2020) [See reference 339]: Sets out the Government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

B.332 The Waste (Circular Economy) (Amendment) Regulations (2020) [See reference 340]: Seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The

Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

B.333 Climate Change Committee, Net Zero – The UK's contribution to stopping global warming (2019) [See reference 341]: Responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK's long-term emissions targets. Our new emissions scenarios draw on ten new research projects, three expert advisory groups, and reviews of the work of the IPCC and others. The report's key findings are that:

- The Committee on Climate Change recommends a new emissions target for the UK: net-zero greenhouse gases by 2050.
- In Scotland, we recommend a net-zero date of 2045, reflecting Scotland's greater relative capacity to remove emissions than the UK as a whole.
- In Wales, we recommend a 95% reduction in greenhouse gases by 2050.

B.334 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018) **[See reference 342]**: Sets out visions for the following sectors:

- People and the Built Environment – "to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate."
- Infrastructure – "an infrastructure network that is resilient to today's natural hazards and prepared for the future changing climate."
- Natural Environment – "the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides."
- Business and Industry – "UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change."
- Local Government – "Local Government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate."

B.335 Our Waste, Our Resources: A strategy for England (2018) [See reference 343]: Aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household

waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.336 The Clean Growth Strategy (2017) [See reference 344]: Sets out the approach of the Government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

B.337 The National Planning Policy for Waste (NPPW) (2014) [See reference 345]: Identifies key planning objectives, requiring planning Authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensure the design and layout of new development supports sustainable waste management.

B.338 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK 2012 [See reference 346]: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.339 The Promotion of the Use of Energy from Renewables Sources Regulations 2011 [See reference 347]: Required the Government to ensure that renewable energy comprised 15% of the UK's total energy mix by 2020. The Renewable Energy Directive has now been superseded by Directive (EU) 2018/2001 (RED II). Although the UK has now been released from the renewable energy targets under RED II following Brexit, the UK-EU Trade and Cooperation Agreement includes a commitment to promote energy efficiency and the use of energy from

renewable sources and reaffirmation of the EU's 2030 "targets" and the UK's 2030 "ambitions" for renewable energy and energy efficiency.

B.340 The National Flood and Coastal Erosion Risk Management Strategy for England 2011 [See reference 348]: Sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property;
- Facilitate decision-making and action at the appropriate level – individual, community or Local Authority, river catchment, coastal cell or national; and
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

B.341 The Flood and Water Management Act 2010 [See reference 349] **and The Flood and Water Regulations 2019 [See reference 350]**: Sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.342 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009) [See reference 351]: Sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

B.343 The UK Renewable Energy Strategy (2009) [See reference 352]: Sets out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

B.344 The Climate Change Act 2008 [See reference 353]: Sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

B.345 The Planning and Energy Act (2008) [See reference 354]: Enables local planning authorities to set requirements for carbon reduction and renewable energy

provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

Sub-national

B.346 Cambridge Water, Water Resources Management Plan (WRMP) (2025) [See reference 355]: Describes how Cambridge Water aims to meet the demand for water in the Cambridge area, including consideration of climate change, population growth and the need to protect the environment. The WRMP recognises the increased demand for water due to a growing population, the potential for adverse environmental impacts of extraction and the need to reduce water wastage.

B.347 Affinity Water and Anglian Water WRMPs (2024) [See reference 356]: To be taken into consideration as neighbouring suppliers, given that WRMPs do not operate in isolation and abstraction by one can significantly affect the environment of another.

B.348 Cambridge Climate Change Risk Assessment and Adaptation Plan (2024) [See reference 357]: This plan was developed as part of one of the actions identified in the Council's 2021-2026 Climate Change Strategy. It aims to improve the resilience of the Council and city to extreme weather events through multiple actions outlined in the plan.

B.349 Anglian Water's Long Term Delivery Strategy (2023) [See reference 358]: A plan to prioritise investment across the wider region to help balance supply and demand for water recycling services, considering risks from growth, climate change, severe drought, and customer behaviours.

B.350 Anglian River Basin District Flood Risk Management Plan 2021 to 2027 (2022) [See reference 359]: Explains the risk of flooding from various sources and how risk management authorities will work with communities to manage it over a period of six years.

B.351 Anglian River Basin Management Plan (2022) [See reference 360]: Provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning.

B.352 Cambridge City Council Corporate Plan 2022-2027 (2022) [See reference 361]: Sets out four key priorities for the city over the next five years. Priority 1 is "Leading Cambridge's response to the climate and biodiversity emergencies and creating a net zero council by 2030.

B.353 Cambridge City Council Climate Change Strategy 2021-26 (2021) [See reference 362]: Sets out a vision for Cambridge to be net zero carbon by 2030, including six key objectives for how Cambridge City will address the causes and consequences of climate change. These objectives are:

- Reducing carbon emissions from City Council buildings, land, vehicles and services.
- Reducing energy consumption and carbon emissions from homes and buildings in Cambridge.
- Reducing carbon emissions from transport in Cambridge.
- Reducing consumption of resources, reducing waste, and increasing recycling in Cambridge.
- Promoting sustainable food.
- Supporting Council services, residents and businesses to adapt to the impacts of climate change.

B.354 Cambridge & South Cambridgeshire Level 1 SFRA (2021) [See reference 363]: Assesses the extent and nature of the risk of flooding in the area and its implications for land use planning. It finds that most of the internal drainage boards within the study area is found in the north of South Cambridgeshire, and that fluvial flooding is the dominant source of flood risk, with surface water also likely to be a key issue.

B.355 Greater Cambridge Integrated Water Management Study Outline Water Cycle Study (2021) [See reference 364]: Updates the Phase 1 Outline Water Cycle Strategy prepared for the previous Local Plan in 2008, providing updated evidence on water supply, wastewater treatment, and infrastructure needs to support future development in the region.

B.356 Greater Cambridge Sustainable Design and Construction SPD (2020) [See reference 365]: Sets out guidance on the policies within the adopted 2018 Cambridge and South Cambridgeshire Local Plans that relate to ensuring increased levels of sustainability in relation to design and construction.

B.357 Scoping Report: Feasibility of a Carbon Offset Mechanism for Cambridgeshire (2010) [See reference 366]: Explores the role that a Carbon Offset Fund (COF) could play in delivering low carbon growth within Cambridgeshire, as an alternative to developer meeting their whole carbon reduction obligations through on-site measures, with a focus on large-scale projects.

B.358 Zero Carbon Study (2020) **[See reference 367]**: Outlines how South Cambridgeshire Council are supporting the district to halve carbon emissions by 2030 and reduce them to net zero by 2050.

B.359 Cambridgeshire Flood and Water SPD (2016) **[See reference 368]:** Provides guidance for developers on how to manage flood risk and the water environment as part of new development proposals. This includes how to incorporate sustainable drainage systems and how to take account of climate change.

B.360 Citywide Tree Strategy (2016-2026) **[See reference 369]:** Aims to sustainable manage the Council's own trees and those it manages by agreement, to foster a resilient tree population that responds to the impacts of climate change and urban expansion, to raise awareness of trees being a vital community asset, through promoting continued research, through education via the provision of advice and through partnership working and to make efficient and strategic use of the Council's regulatory powers for the protection of trees of current and future value.

B.361 Cambridgeshire Surface Water Management Plan (2014) **[See reference 370]:** Recognises that surface water flooding can put more properties at risk than fluvial flooding and can be more difficult to predict that river or coastal flooding. It collates and reviews flood incident records and produces a revised list of 'wetspot' prioritisation to assist in allocating resources.

B.362 Histon and Impington Surface Water Management Plan (2014) **[See reference 371]:** Investigates surface water flooding issues and the feasibility of potential mitigation solutions in Histon and Impington villages, located to the north of Cambridge. It focuses on three earlier identified 'wetspots' based on historic flooding evidence and mapping.

B.363 Cambridgeshire Renewables Infrastructure Framework (2012) **[See reference 372]:** Identifies a wide range of renewable technologies available, creating opportunities for Cambridgeshire to be a leading county for clean energy projects, goods and services, recognising that the Cambridge area has an excellent research base for renewable energy technologies and is an ideal location in the UK for growth in the sector. The Framework identifies that 9% of the opportunity is in Cambridge City and 26% in South Cambridgeshire. A separate report setting out the baseline data notes that South Cambridgeshire (along with Huntingdonshire) has both the greatest renewable energy potential and the greatest energy demand.

B.364 Cambridgeshire Community Energy Fund Final Report (2012) **[See reference 373]:** Presents a study of the role that a community energy fund (CEF) might play in delivering carbon emissions reduction in Cambridgeshire. This relates

to a potential charge on developers for the emissions resulting from new development and pool these into a fund for carbon saving projects.

B.365 Cambridgeshire Green Infrastructure Strategy (2011) [See reference 374]: Mitigating and adapting to climate change is one of the four objectives of the Strategy. It notes the low-lying nature of the county and subsequent flood risk, as well as the prospect that growth and development will further exacerbate the human and economic impacts. The Green Infrastructure Strategy is currently being updated.

B.366 Decarbonising Cambridge Study (2010): Provides the evidence base for setting targets for the CO_2 performance of new developments in Cambridge. Assesses the potential for low carbon and renewable energy systems and provides advice on the development of planning policy and identifying supportive measures to achieve policy goals. An update to this work looking at the role of planning in delivering net zero is to be commissioned.

B.367 Cambridge Area Water Cycle Strategy - Phase 1 (2008) and Phase 2 (2011) [See reference 375]: Provides an evidence base concerning the required water services infrastructure for planned development in the Cambridge Sub-Region (CSR). The Phase 1 study identified no insurmountable technical constraints to the proposed level of growth, but identified a number of important issues including the need for a Surface Water Management Plan, a detailed analysis of increased flood risk at the Swavesy Drain, and the need to investigate the viability of achieving 'water neutrality'. Phase 2 goes further and supports a more aspirational vision for water management, including aspirations to water neutrality, improving biodiversity and sustainable surface water management. In addition, a further dedicated Water Cycle Strategy (WCS) was developed in 2014 for the allocated strategic development site at Denny St Francis, north of the existing town of Waterbeach. An update to this strategy is being commissioned by the Councils, which will form part of an Integrated Water Management Study.

B.368 Cambridge and Milton Surface Water Management Plan (2011) [See reference 376]: Aims to produce a long term surface water management Action Plan for Cambridge and Milton, to be reviewed every 6 years at a minimum. The study notes increasing flood risk associated with climate change as a critical factor.

B.369 Great Ouse Catchment Flood Management Plan (2011) [See reference 377]: Sets out the scale and extent of flooding now and in the future, and policies for managing flood risk within the catchment.

Current Baseline

B.370 Following a Council meeting in November 2018, South Cambridgeshire District Council pledged to support a target of cutting local CO_2 emissions to zero by 2050, which was before the Government adopted net zero by 2050 as a national target in 2019 **[See reference 378]**.

B.371 In February 2019 Cambridge City Council declared a 'climate emergency', following the submission of a petition signed by over 2,000 local residents. The Council also agreed on the same date to establish a Cambridge Climate Charter, which will call on all organisations, businesses and individuals in the city to each establish their own carbon reduction plans to work toward achieving the city's net carbon-zero aspiration **[See reference 379]**. A Climate Change Strategy was adopted by Cambridge City Council in 2021. The strategy sets a vision for Cambridge to be net zero carbon by 2030, subject to Government, industry and regulators implementing the necessary changes to enable the city and the rest of the UK to achieve this.

Climate change mitigation

B.372 Territorial carbon dioxide emissions within the scope of influence of South Cambridgeshire District fell from 1,737.9 ktCO_2e in 2005 to 1,069.5 ktCO_2e in 2023, representing a substantial overall reduction. In Cambridge City, emissions fell from 834.8 ktCO_2e in 2005 to 436.9 ktCO_2e in 2023. Although total emissions remain higher in South Cambridgeshire than in Cambridge City, both areas have achieved significant reductions over the period **[See reference** 380**]**.As illustrated in Table B.4, both South Cambridgeshire and Cambridge City achieved substantial overall reductions in CO_2 emissions between 2005 and 2023, with total emissions falling by 38.5% and 47.7% respectively. In South Cambridgeshire, the largest proportional reductions were in the industrial and commercial sector, which fell by 74.2%, and the public sector, which fell by 65.3%; however, transport emissions reduced by only 8.7% and now make the largest contribution to emissions, accounting for 51.0% of the district's total in 2023. In Cambridge City, emissions fell across all main emitting sectors, including industrial and commercial, public sector, domestic and transport. Industrial and commercial emissions remain the largest contributor in Cambridge City, accounting for 31.4% of the total in 2023, followed by domestic emissions at 28.8% and transport at 21.1% **[See reference** 381**]**.

B.373 It should be noted that the figures in Table B.4 do not account for large industrial sites, railways, motorways, livestock, and soils.

B.374 Protection and enhancement of the lowland peat resource is critical to mitigating and adapting to climate change given its significant role in carbon sequestration, flood storage/management and maintaining water quality. The Cambridgeshire Fens include a significant proportion of the East Anglian Fen peat and pilot projects by Defra, including the East Anglian Fens Peat Pilot, will work with internal drainage boards to look at water flows on and around the fens. It will also bring in long-term sustainability of peat management opportunities and creation of the Lowland Agricultural Peat Taskforce.

Table B.4: Reduction in CO_2 Emissions between 2005-2023 [See reference **382**]

South Cambridgeshire:

Year	Industrial and Commercial	Public Sector	Domestic	Transport	Agriculture	Waste	Total
2005	706	36.9	365.2	597.4	59.8	0.1	1,737.9
2023	182.2	12.8	197.1	545.6	57.9	0.1	1,069.5
% of total (2023)	17.0%	1.2%	18.4%	51.0%	5.4%	0.01%	100%
Change 2005-2023	-74.19%	-65.31%	-46%	-8.67%	-3.18%	-0%	-38.5%

Cambridge City:

Year	Industrial and Commercial	Public Sector	Domestic	Transport	Agriculture	Waste	Total
2005	273.5	177.1	244.6	135.0	2.9	0.0	834.8
2023	137.3	79.0	125.9	92.2	1.2	0.0	436.9
% of total (2023)	31.4%	18.1%	28.8%	21.1%	0.3%	0.0%	100%
Change 2005-2023	-49.8%	-55.4%	-48.5%	-31.7%	-58.6%	0.0%	-47.7%

B.375 The Cambridgeshire Renewables Infrastructure Framework (CRIF) **[See reference 383]** notes that in order to meet carbon reduction objectives across the county, both energy efficiency and renewable energy are needed. The Cambridge Local Plan and associated Greater Cambridge Sustainable Design and Construction SPD **[See reference 384]** outlines the standards required to meet the visions, objectives and policies of the Cambridge and South Cambridgeshire Local Plans in a sustainable manner. In particular, the SPD sets out guidance that seeks to ensure developments are built to high sustainability standards and are adaptable to future climate change. In terms of carbon emissions, the SPD requires all new residential development to reduce emissions by 44% compared to a Building Regulations 2006 baseline. It sets a standard of a 19% improvement in the Dwelling Emission Rate/Target Emission Rate over Part L 2013, presented through a carbon reduction report. In South Cambridgeshire, planning policy requires new developments to use on-site renewable and/or low carbon energy to reduce carbon emissions associated with Regulated Energy use by 10%.

B.376 As far as energy generation is concerned, the CRIF notes that the county already has the greatest installed renewable energy capacity in the East of England and one of the highest outputs of any county in England, however there is room for greater deployment to meet the full demand and using a range of technologies. This would require a substantial amount of new infrastructure. The Framework highlights that South Cambridgeshire has high potential for renewable energy technology, and that Cambridge lacks wind resources but has substantial potential for air source heat pumps and PV, although the high density and number of conservation areas limits the potential for building integrated technologies **[See reference 385]**

Climate change adaptation

B.377 The Met Office UK Climate Projections 2018 study (UKCP18) provide information on how the climate of the UK is expected to change in the period up to the end of the 21st Century. In the highest emissions scenario, which may come to pass based on current emissions reduction trends, summer temperatures in the UK could be 5.4°C warmer by 2070 than the average summer between 1981 and 2000. Average summer rainfall would fall by 47% in this scenario. Winters could be up to 4.2C warmer, with up to 35% more rainfall by 2070.There has been a general trend towards warmer average temperatures in recent years. 2024 was provisionally the fourth warmest year on record for the UK, with a mean temperature of 9.78°C, which is 0.64°C above the 1991-2020 average. Only 2022, 2023 and 2014 recorded higher average temperatures. All the top ten warmest years for the UK in the series from 1884 have occurred since 2000, with five of them in the most recent decade **[See reference 386]**.

B.378 Changes to the climate will bring new challenges to Greater Cambridge's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. 'Urban heat island' effects are also raised as an issue across the county by the Cambridgeshire Green Infrastructure Strategy, which can be managed through the management and planting of green space, tree planting and the creation of wetlands, especially in densely built up areas such as Cambridge and larger market towns **[See reference 387]**.

B.379 4.14 The Tyndall Centre for Climate Change Research has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Cambridge **[See reference** 388**]** and South Cambridgeshire **[See reference** 389**]**:

- Cambridge must stay within a maximum cumulative carbon dioxide emissions budget of 3.6 million tonnes ($MtCO_2$) for the period of 2020 to 2100. At 2017 CO_2 emission levels, Cambridge would use this entire budget within 7 years from 2020. South Cambridgeshire must stay within a maximum cumulative carbon dioxide emissions budget of 7.4 million tonnes ($MtCO_2$) for the period of 2020 to 2100. At 2017 CO_2 emission levels, South Cambridgeshire would use this entire budget within 6 years from 2020.
- Cambridge must initiate an immediate programme of CO_2 mitigation to deliver cuts in emissions averaging a minimum of -12.6% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities. South Cambridgeshire must initiate an immediate programme of CO_2 mitigation to deliver cuts in emissions averaging a minimum of -13.9% per year to deliver a Paris aligned carbon budget. Like Cambridge, these annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities.
- Cambridge must reach zero or near zero carbon no later than 2043. This report provides an indicative CO_2 reduction pathway that stays within the recommended maximum carbon budget of 3.6 $MtCO_2$. At 2043 5% of the budget remains. This represents very low levels of residual CO_2 emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO_2 emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO_2 emissions are also adopted. South Cambridgeshire must

reach zero or near zero carbon no later than 2043. This report provides an indicative CO_2 reduction pathway that stays within the recommended maximum carbon budget of 3.6 $MtCO_2$. At 2043 5% of the budget remains. This represents very low levels of residual CO_2 emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO_2 emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO_2 emissions are also adopted.

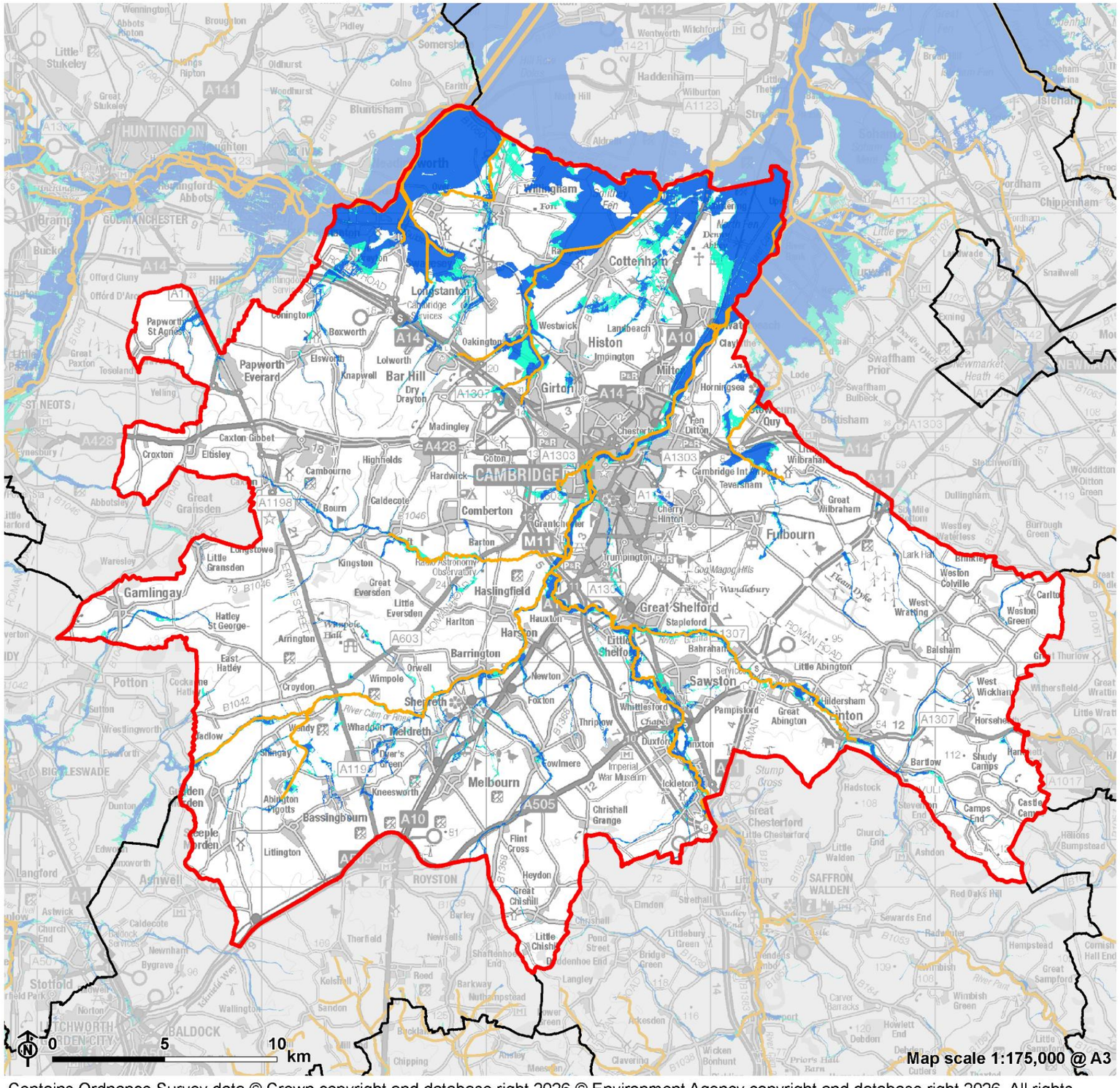
B.380 Areas at risk of surface and fluvial water flooding are shown in Figure B.8a and Figure B.9b. The low-lying nature of the county of Cambridgeshire also makes the wider area susceptible to both fluvial and (potentially) coastal flooding, which are susceptible to flooding regardless of climate change impacts, but which are expected to increase as a result of climate change. Due to its low lying nature (particularly in the fenland lying north of Cambridge), the plan area acts as a floodplain for two main drainage catchments – the Cam and the Great Ouse (the Cam is a tributary of the Great Ouse). Much of Cambridgeshire's land, on a county level, is actively drained by pumping, which has a significant carbon footprint **[See reference 390]**.

Figure B.8a: Fluvial flood risk

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Figure B.9a : Flood risk in Greater Cambridge



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Figure B.9b: Surface water flood risk

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Figure B.9b : Surface water flooding in Greater Cambridge

Greater Cambridge boundary
Neighbouring local authority

Risk of flooding from surface water

3.3 percent annual chance (1 in 30 year)
1 percent annual chance (1 in 100 year)

0 5 10 km

Map scale 1:175,000 @ A3

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Key sustainability issues for Greater Cambridge and likely evolution without the Local Plan

- Key issues: While carbon emissions from all sectors have fallen in both districts since 2005, given the rural nature of South Cambridgeshire there has been little progress on transport emissions, which still accounted for 51.0% of the total as of 2023. Cambridge City and South Cambridgeshire Councils have committed to reaching net zero by 2030 and 2050, respectively. To meet this, they will need to make significant shifts in energy efficiency of existing and new buildings, transport trends, and the further deployment of a range of renewables infrastructure.
  - Likely evolution: Several policies in the South Cambridgeshire Local Plan seek to reduce per capital emissions, including CC1, CC2 CC/3 and CC/5, which require mitigation principles to be embedded in new development, encourage renewable energy generation and on-site generation, and measures to encourage home buyers to select sustainable options. Similarly, Policies 28, 29 and 30 of the existing Cambridge Local Plan prioritise renewable energy generation, sustainable design and energy efficiency measures in existing dwellings. However since these plans were adopted, the Councils have committed to more ambitious carbon reduction targets that developments will be required to meet. The new Local Plan provides an opportunity to strengthen policies which act positively in terms of climate change, especially those that limit the need to travel through the appropriate siting and design of new development.
  - Relevant SA objectives: SA objective 12
- Key issues: The effects of climate change in Greater Cambridge are likely to result in extreme weather events (e.g. heavy rainfall, prolonged high temperatures and drought) becoming more common and more intense.
  - Likely evolution: Policy CC/1 of the South Cambridgeshire Local Plan requires development to embed climate adaptation measures, including conservation of water, flood risk management, SuDs, a layout that combats overheating, and better linked habitat networks. Similarly, Policies 28, 31 and 32 of the Cambridge Local Plan requires new development to adapt through sustainable design, water management and flood risk adaptation measures. While the new Local Plan will not influence extreme weather events, it can build upon the approach of current policy to better respond to current circumstances as evidence and techniques develop.
  - Relevant SA objectives: SA objective 4, SA objective 11

- Key issues: Greater Cambridge will need to become more resilient to the increased risk of flooding. Given the low-lying nature of the plan area, it is at significant risk of fluvial and surface water flooding, especially in the north, which is likely to be exacerbated by climate change.
  - Likely evolution: Policies CC/8 and CC/9 of the South Cambridgeshire Local Plan require developments to be appropriately sites to take flood risk into account and to incorporate SuDS to manage surface water. Similarly, Policies 31 and 32 of the Cambridge City Local Plan require surface water to be managed close to its source where possible, including through SuDS, and to manage flood risk through siting. The new Local Plan presents the opportunity, alongside national measures, to mitigate the effects of potential future flooding through appropriate siting of development and flood resilient design. It will also allow policy to respond to the update evidence based regarding flood risk in the plan area.
  - Relevant SA objectives: SA objective 4, SA objective 11

Biodiversity

Policy Context

International

B.381 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) [See reference 391]: international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

B.382 The 2030 Agenda for Sustainable Development (2015) [See reference 392] This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 13: Climate Action.
- SDG 14: Life Below Water.
- SDG 15: Life on Land.

B.383 The European Birds Directive (2009) [See reference 393]: Requires the maintenance of all species of naturally occurring birds in the wild state in the

European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

B.384 International Convention on Biological Diversity (1992) [See reference 394]: International commitment to biodiversity conservation through national strategies and action plans.

B.385 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) [See reference 395]: Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.386 International Convention on Wetlands (Ramsar Convention) (1976) [See reference 396]: International agreement with the aim of conserving and managing the use of wetlands and their resources.

National plans and programmes (beyond the NPPF) of most relevance to the Local Plan

B.387 Environmental Improvement Plan (2025) **[See reference 397]** is a long-term delivery plan made up of five inter-related chapters setting out 10 goals, commitments and actions in relation to the natural environment. The plan sets out how they will work with landowners, communities and businesses to deliver each goal for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of the country. The overarching goal of the Plan is achieving “restored nature”, including progress towards the commitment to protect 30% of UK land and sea for nature by 2030, alongside improving the condition and resilience of nature assets.

B.388 Environmental Improvement Plan annual progress report (2025) [See reference 398]: Sets out the progress made in improving the environment through the 25 Year Plan and the indicator framework, which contains 66 indicators arranged into 10 broad themes.

B.389 Working with nature (2022) [See reference 399]: Discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England’s habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

B.390 Defra, Establishing the Best Available Techniques for the UK (UK BAT) (2022) **[See reference** 400**]**: Sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

B.391 The Environment Act 2021 **[See reference** 401**]** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

B.392 Climate Change Adaptation Manual (2020) [**See reference** 402**]**: A resource to support practical and pragmatic decision-making relating to climate change adaptation. The manual brings together recent science, experience and case studies to be used by managers of nature reserves and other protected sites, conservation and land management advisors, and environmental consultants.

B.393 Landscapes Review (2019) [See reference 403]: Explores the fragmented and often marginalised system of managing National Parks and AONBs recommends actions to achieve structural reform. The review looks at:

- The existing statutory purposes for National Parks and AONBs and how effectively they are being met.
- The alignment of these purposes with the goals set out in the 25 Year Environment Plan.
- The case for extension or creation of new designated areas.
- How to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets.
- The financing of National Parks and AONBs.
- How to enhance the environment and biodiversity in existing designations.
- How to build on the existing eight point plan for National Parks and connect more people with the natural environment from all sections of society and improve health and wellbeing.
- How well National Parks and AONBs support communities.
- The process of designating National Parks and AONBs and extending boundary areas, with a view to improving and expediting the process.

B.394 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [See reference 404] protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

B.395 A Green Future: Our 25 Year Plan to Improve the Environment (2018) [See reference 405]: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:

    - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
    - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
    - Protecting and improving our global environment:
- Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
    - Support and protect international forests and sustainable agriculture.

B.396 England Biodiversity Strategy Climate Change Adaptation Principles (2008) [See reference 406**]**: Sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpins all of these.

B.397 Environmental Damage (Prevention and Remediation) Regulations 2015 [See reference 407**]**: Wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

B.398 Biodiversity offsetting in England Green Paper (2013) [See reference 408**]**: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

B.399 Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) [See reference 409**]** : Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks.

B.400 Natural Environment and Rural Communities Act (2006): [See reference 410]: Places a duty on public bodies to conserve biodiversity.

B.401 The Natural Environment and Rural Communities Act 2006 **[See reference** 411**]** places a duty on public bodies to conserve biodiversity.

Sub national

B.402 Draft Cambridgeshire and Peterborough Local Nature Recovery Strategy (2025) **[See reference** 412**]**: Sets priorities for nature recovery in the area. Once adopted it will include a statement of biodiversity priorities and local habitat map.

B.403 Anglian River Basin Management Plan (2022) **[See reference 413]**: Provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning.

B.404 Greater Cambridge Biodiversity SPD (2022) **[See reference** 414**]**: The SPD provides accessible, accurate and up-to-date guidance on the planning regulations surrounding biodiversity, including relevant national legislation. The document sets out the information that should be submitted with planning applications to demonstrate how development proposals meet the councils' requirements. The SPD is a material planning consideration in determining planning applications in both Council areas.

B.405 Cambridge Biodiversity Strategy 2022-2030 (2022) **[See reference** 415**]**: Sets out a clear vision of the direction in which we need to be heading, in order to achieve our objective of a measurable net biodiversity gain across Cambridge, alongside the objective of tackling climate change by becoming a net zero council by 2030. The strategy outlines plans to:

- protect and enhance wildlife habitats, and where possible expand and link them
- combine the best wildlife habitats into a wider ecological network that stretches beyond the city
- give everyone who lives or works in Cambridge easy access to high-quality natural green spaces
- promote greater awareness and understanding of biodiversity

B.406 South Cambridgeshire Doubling Nature Strategy (2020) **[See reference** 416**]**: Aims to significantly enhance and protect the area's natural environment. It focuses on doubling the benefits that nature provides to residents and biodiversity by promoting sustainable development, biodiversity conservation, green spaces, and community engagement.

B.407 Doubling Nature – A Vision for the Natural Future of Cambridgeshire and Peterborough in 2050 (2019) **[See reference 417]**: Sets out the vision of Natural Cambridgeshire, the local nature partnership, of doubling nature across

Cambridgeshire and Peterborough. The vision is to double the area of rich wildlife habitats and green-space from 8.5% to 17%.

B.408 Mapping natural capital and opportunities for habitat creation in Cambridgeshire (2019) [See reference 418]: Report on a project to produce a detailed habitat base map for the whole of Cambridgeshire (including Peterborough) in order to identify opportunities to enhance biodiversity.

B.409 Citywide Tree Strategy 2016-2026 [See reference 419]: Aims to sustainable manage the Council's own trees and those it manages by agreement, to foster a resilient tree population that responds to the impacts of climate change and urban expansion, to raise awareness of trees being a vital community asset, through promoting continued research, through education via the provision of advice and through partnership working and to make efficient and strategic use of the Council's regulatory powers for the protection of trees of current and future value.

B.410 Cambridgeshire Green Infrastructure Strategy (2011) [See reference 420]: One of the four overarching objectives of the county-level GI strategy is to reverse the decline in biodiversity. The strategy outlines a series of issues, opportunities and constraints for biodiversity in Cambridgeshire. A new Green Infrastructure study is being prepared by both Councils for Greater Cambridge's emerging Local Plan.

B.411 Cambridgeshire and Peterborough Habitat Action Plans [See reference 421]: The Cambridgeshire and Peterborough Biodiversity Group have produced a series of Habitat Action Plans for various habitat types, detailing their current status, the factors affecting them, objectives and long term targets, and proposed actions.

B.412 South Cambridgeshire Biodiversity SPD (2009) [See reference 422]: Expands on district-wide policies to ensure that biodiversity is adequately protected and enhanced through the development process. It notes that biodiversity will not be peripheral to the planning process but fully integrated, and is designed to assist applicants in understanding biodiversity requirements.

B.413 Cambridge City Conservation Strategy 'Enhancing Biodiversity' (2006) [See reference 423]: Prepared for Cambridge City Council by the local Wildlife Trust and designed to guide nature conservation activities across the city. It sets out a vision of achieving biodiversity 'net gain' over a 20-year period. As a technical document, it was produced to support the Cambridge Local Plan.

Current Baseline

B.414 In 2019 Cambridge City Council and South Cambridgeshire District Council declared biodiversity emergencies. Both Councils are committed to the protection and enhancement of biodiversity. Any new development should aim to maintain, enhance, restore, or add to biodiversity. Both Councils support the Local Nature Partnership's vision to double the area of rich wildlife habitats and natural greenspace within Cambridgeshire and Peterborough. The Councils are also part of the Natural Cambridgeshire Local Nature Partnership, which is a group of Councils and organisations seeking a future rich in wildlife and connecting people with nature under their Doubling Nature vision. This vision seeks to achieve an increase in the amount of land managed for nature from 8% to 16%, by 2050. One of the main areas of focus to achieve this vision is securing high quality green and blue infrastructure within new residential and commercial developments. Natural Cambridgeshire has also developed a Development with Nature Toolkit to provide developers with a means of demonstrating their commitment to achieving a net gain in biodiversity on major developments. The optional toolkit provides standard guidance that, if followed from the earliest stages of development planning, will determine whether nature is enhanced by the scheme or not **[See reference** 424**]**.

B.415 The Greater Cambridge Shared Planning service consulted on a draft Biodiversity Supplementary Planning Document (SPD) in summer 2021. The aim of the document is to provide accessible, accurate and up-to-date guidance on the planning regulations surrounding biodiversity. The SPD was adopted by South Cambridgeshire District Council in February 2022 and by Cambridge City Council in January 2022 and is a material planning consideration in determining planning applications in both Council areas **[See reference** 425**]**.

B.416 The plan area hosts a range of habitats important for biodiversity, many of which consist of aquatic and wetland habitats and draw on the region's water resources. These sites include statutorily protected Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs), as well as non-statutorily protected Local Nature Reserves (LNR) and County Wildlife Sites (CWS).

B.417 In the past the largely rural nature of the plan area meant that wildlife could easily find refuge and support a variety of species. However, changing farming practices and pressure for development has put pressure on a wide range of species.

B.418 Mapping on behalf of the Cambridgeshire Biodiversity Partnership shows that since the 1930s in Cambridgeshire, semi-natural grassland cover has fallen from around 27% to 4.5% in 2018, while built up area and gardens increased from 5.8% to 10.7% of land cover. This was part of a biodiversity opportunity mapping project

which identified existing high quality habitats and opportunities for habitat creation, as shown in Figure B.10. This shows two layers of habitat opportunity that were created during the project. The first of these is buffer opportunities, which are habitat opportunity areas that are immediately adjacent to existing habitat patches and fall within the previously identified ecological network, therefore providing an opportunity to expand the current area of habitat. The second type of opportunity is stepping-stone opportunities, which are potential sites that fall outside of the ecological network, but are immediately adjacent to it. These areas, including woodland areas and water bodies, could potentially be used to create stepping-stone habitats that could link up more distant habitat patches **[See reference 426]**, and can be taken account of in proposed developments. Natural England's national nature recovery network mapping project provides further evidence on how this habitat connectivity extends beyond the boundaries of Cambridgeshire. The impacts of climate change are likely to have a significant effect on habitat connectivity and biodiversity in Greater Cambridge, as elsewhere, and there is a need to plan for climate change adaptation.

B.419 There is only one internationally important wildlife site within Greater Cambridge – the Eversden and Wimpole Woods SAC, which is noted as of particular importance for its breeding colonies of the rare Barbastelle bat. However, there are 41 Sites of Special Scientific Interest (SSSIs) within the Greater Cambridge area, covering a range of habitats and geological formations, including chalk grassland, species-rich neutral grassland, reedbed and fen, Ancient Woodland, chalk pits, gravel pits and clay pits **[See reference** 427**]**. South Cambridgeshire includes over 30 of these designations, including the linear features of the Roman Road south of Cambridge and Fleam Dyke and the Cam Washes SSSI, which consists of seasonally flooded pastures along the Cam in the north of the plan area used by wildfowl and waders. Three of the sites are designated for the geological interest (Barrington Pit SSSI, Barrington Chalk Pit SSSI and Histon Road SSSI), while the remainder are designated for their biological interest. The Nine Wells local nature reserve on the southern edge of Cambridge was previously designated as a SSSI for its population of rare freshwater invertebrates, however these were lost in the drought of 1976 – there are plans to create the conditions to reintroduce these species.

B.420 Within Cambridge City there are a number of further nationally recognised nature conservation sites, including two SSSIs – the Cherry Hinton Chalk Pits and Traveller's Rest Pit. A third site, Histon Road SSSI, borders the city. A number of additional SSSIs lie immediately on the borders of Greater Cambridge, including Therfield Heath SSSI (Royston), Potton Wood SSSI (Potton), Wicken Fen SSSI (near Soham), and Weaveley and Sand Woods SSSI (Gamlingay). In addition, in South Cambridgeshire there are currently 28 designated Local Nature Reserves (LNRs), of

which 8 are owned by the Council, and are distributed relatively evenly across the District. In Cambridge City, there are 12 designated LNRs, 15 County Wildlife Sites, and 51 City Wildlife Sites. Finally, there are two adjacent RSPB Reserves at Fen Drayton Lakes and Ouse Fen on the northern border with Huntingdonshire, and a further (smaller) RSPB Reserve at Fowlmere in the south.

B.421 In Cambridge City and South Cambridgeshire, during the monitoring year of 2023-2024, the size and number of LNR and CWS remained the same as the previous year. Likewise, there was no change to the Eversden and Wimpole Woods Special Area of Conservation (SAC) that fall within South Cambridgeshire, and no new SACs have been designated in the Greater Cambridge area. The size of Special Sites of Scientific Interest (SSSI) also remained the same in both Cambridge City and South Cambridgeshire.

B.422 In Cambridge City and South Cambridgeshire, during the monitoring year of 2024-2025 , the size and number of LNR and CWS remained the same as the previous year. Likewise, there was no change to the Eversden and Wimpole Woods Special Area of Conservation (SAC) that fall within South Cambridgeshire, and no new SACs have been designated in the Greater Cambridge area. The size of Special Sites of Scientific Interest (SSSI) also remained the same in both Cambridge City and South Cambridgeshire.

B.423 The quality of SSSIs in Cambridge City has also remained the same compared to the 2023-2024 monitoring year, with the majority of SSSI land deemed to be in either a ‘favourable’ or an ‘unfavourable recovering’ condition. However, a reduction in the quality of SSSIs in South Cambridgeshire has been observed when compared to data from the previous monitoring year.

B.424 Changes to the condition of the Fowlmere Watercress Beds saw an increase in the percentage of SSSI land in an “unfavourable no change” condition (from 7.7% to 11.9%). The amount of SSSI land in “favourable” condition reduce from 49.0% to 46.2%, and the amount of SSSI land in an “unfavourable recovering” condition reduce from 40.1% to 38.7% **[See reference** 428**]**.

B.425 In addition, Cambridgeshire County Council have designated a list of Protected Road Verges (PRVs), recognising their status as the largest area of unimproved grassland in the county and their role as important habitat **[See reference 429]**.

B.426 Figure B.9 shows the various biodiversity designations within the plan area.

B.427 The Greater Cambridge Biodiversity SPD (2022) **[See reference** 430**]** describes the priority habitats found across the plan area. Lowland Calcareous

Grassland is predominantly found to the south east of Cambridge, within the Gog Magog Hills. To the east and north east is the fenland, with concentrations of Lowland Fen, Reedbeds and Lowland Meadows. The corridor of the River Cam and its tributaries supports Floodplain Grassland Mosaic, Wet Woodland and Lowland Meadows, as well as the River habitat itself and Chalk Stream sections. To the west of Cambridge are Lowland Mixed Deciduous Woodland, Hedgerows, Lowland Meadows and Traditional Orchards on the boulder clay. To the north of Cambridge, the presence of Traditional Orchards on the fen edge reflects the significance of former land uses.

B.428 In addition, the SPD further identifies Priority Species. Given the largely agricultural character of the area, there is good representation of farmland bird species such as Skylark, Turtle Dove, Tree Sparrow, Grey Partridge and Yellowhammer, whose populations could be affected by any development on arable land. The loss of breeding territories of such farmland birds is likely to require compensation by provision on nearby farmland. Overwintering birds such as Lapwing and Golden Plover are also important farmland species to be considered in ecology surveys.

B.429 On the eastern borders of the plan area, the National Trust 'Wicken Fen Vision' project plans to extend the wetland landscape to 53 square kilometres by 2099 and restore natural processes to allow the mosaic of habitats to recover. The territory this plan extends into South Cambridgeshire District and includes land lying east of the River Cam and between the settlements of Waterbeach and Lode **[See reference 431]**. The Cambridgeshire Fens (lying between Peterborough and Cambridge) also provides a valuable fenland habitat context to the wider area. The Wicken Fen Vision includes an aspiration for increased public access in the southern part of the vision area, which could help provide additional open green space, particularly for residents of Cambridge City.

B.430 South Cambridgeshire is relatively sparsely wooded, **[See reference 432]** with small pockets of ancient woodland concentrated mainly in the west of the plan area (on the border with Huntingdonshire) and in the south east (on the border with the relatively well wooded Uttlesford and St Edmundsbury). The 'West Cambridgeshire Hundreds' project is an effort to reverse the damage and fragmentation of woodlands in the broader area, helping to support habitat connectivity. Three sites that form part of this initiative lie in the west of the plan area (Hardwick Wood, Cambourne Nature Reserve and Hayley Wood) and the remaining two lie across the border in Huntingdonshire. The Councils are also commissioning green infrastructure work to inform the emerging Local Plan.

B.431 The condition of the plan area's designated sites is mixed – the Cherry Hinton Pit SSSI has been assessed as in 'mostly unfavourable' condition, while the Traveller's Rest Pit SSSI is in 'favourable' condition. The Therfield Heath SSSI on the southern border of Greater Cambridge (within North Hertfordshire) was classified as mostly 'unfavourable recovering' and is under stress from recreational pressure, particularly due to level of public use, including from new and proposed development nearby, recreational facilities and access rights as Common Ground. North Hertfordshire District Council are preparing a mitigation plan for the site, and the Councils will need to consider any cross-border implication of development on this site. In addition, the Eversden and Wimpole Woods SSSI was assessed as being in mostly 'unfavourable – recovering' condition, with some areas in 'favourable' condition.

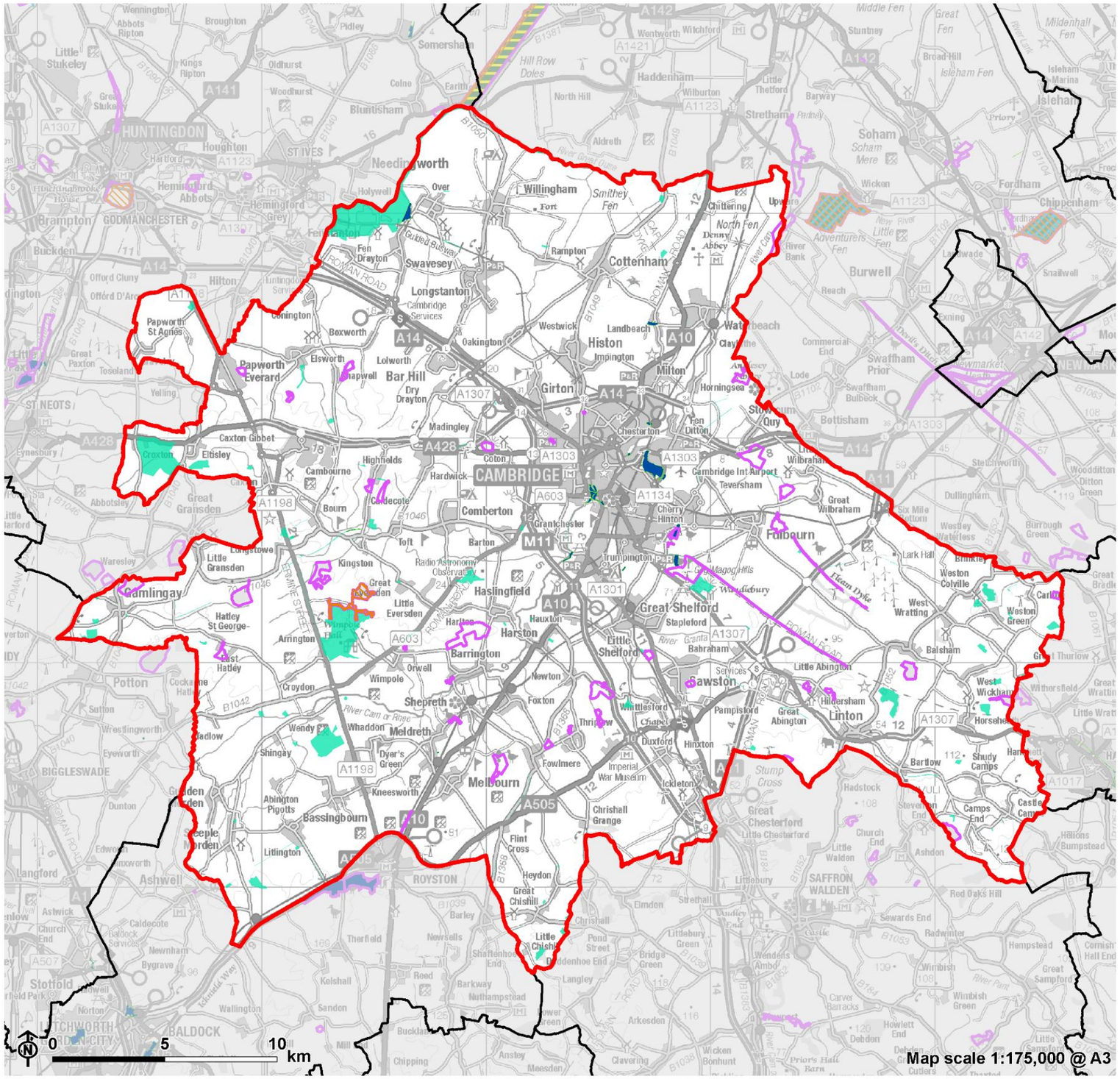
B.432 The Cambridgeshire SSSI Recreational Pressure Impact Risk Zones (IRZs) produced by Natural England can be used to gauge the extent of recreational pressure on designated sites due to recreational pressure. Natural England's Monitoring Engagement in the Natural Environment (MENE) data, in addition to other visitor surveys by the National Trust at Wicken Fen and elsewhere, provide more in-depth understanding of these zones of influence and the effects of recreational pressure. Given the importance of aquatic habitats within the plan area, threats to the water environment from over-abstraction and unsustainable water use also present a threat to designated sites.

B.433 The 2011 Cambridgeshire Green Infrastructure Strategy notes that habitat loss and fragmentation is a key concern in the broader region, which is influenced by threats from climate change and development. In particular, patches of woodland in Cambridgeshire remain ecologically isolated and there are no large patches of continuous habitat – opportunities for field-scale habitat creation exist to connect these isolated woodland fragments **[See reference 433]**. The water environment too has an important role to play in habitat connectivity in Greater Cambridge. The Green Infrastructure Strategy notes that biodiversity is not always recognised as having the same value as economic activity and other areas. A new biodiversity/green infrastructure study is currently being commissioned by the Councils to serve as an updated evidence base. Biodiversity and wider environmental net gain will be an important consideration.

B.434 Cambridge and the north eastern part of South Cambridgeshire lie within the proposed 'The Fens' Biosphere reserve. The Fens Biosphere is a multi-sector partnership, co-ordinated by Cambridgeshire ACRE and drawn from all sectors of life is working together to achieve UNESCO Biosphere status for the Fens. To be recognised by UNESCO as a Biosphere, the area of land must have a strong identity, excellent resources management and a focus on learning and innovation. In

particular, The Fens Biosphere aims to bring people, nature and science together to provide a great quality of life in the fens without exhausting or damaging the resources in the area. These resources include an exceptional environment and wildlife; the natural resources of land, soil and water and the people who live and work in its communities. The area of The Fens that lies within Greater Cambridge is identified as part of the 'transition zone', where the focus will be on ensuring that resident needs (housing, jobs, recreation and so on) are sustainable and, if possible, benefit wildlife and the environment **[See reference 434]**. The Local Plan can help to achieve this.

Figure B.90: Biodiversity designations



Regulation 19 Sustainability Appraisal
Cambridge City Council and South Cambridgeshire District Council

LUC

Figure B.10 : Biodiversity sites in Greater Cambridge

- Greater Cambridge boundary
- Neighbouring local authority
- Special Area of Conservation
- Special Protection Area
- Ramsar Site
- Site of Special Scientific Interest
- National Nature Reserve
- Local Nature Reserve
- Local Wildlife Site

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Key sustainability issues for Greater Cambridge and likely evolution without the new Local Plan

- Key issues: Greater Cambridge both contains and is in close proximity to a number of designated and non-designated natural habitats which are important for biodiversity. This includes those designated for their national and international importance. Not all SSSIs are in favourable condition.
  - Likely evolution: While the designation of the biodiversity sites described above provide a level of protection (particularly those that are nationally and internationally designated), pressures are likely to continue due to ongoing pressure for further development and growth projections. This is especially the case for non-designated sites and sites of potential importance to biodiversity. Policy NH/5 of the South Cambridgeshire Local Plan prevents development from having adverse effects on designated sites unless in exceptional circumstances. Policy 69 of the Cambridge Local Plan contains similar requirements. The new Local Plan presents the opportunity for new development to come forward at the most appropriate locations to avoid detrimental impacts on biodiversity assets, as well as to update planning policy in relation to biodiversity net gain requirements. The findings of the HRA have been incorporated into the SA and provide further insight into biodiversity impacts specifically at designated sites, presenting the opportunity to limit adverse impacts at these locations.
  - Relevant SA objectives: SA objective 5
- Key issues: Although designated sites represent some of the most valued habitats in the plan area, the overall ecological network is also important for biodiversity as a whole and helps to support the health of designated sites, allowing species to migrate in response to climate change. The fragmentation and erosion of habitats and the wider ecological network in Greater Cambridge, including the identified sparse woodland cover and condition of water bodies, is an ongoing threat to biodiversity.
  - Likely evolution: Erosion and fragmentation of habitats and ecological networks could take place through poorly located and designed development. The NPPF requires Local Plans to include policies to safeguard, restore and create ecological networks at a landscape scale. This will align with the aims of the Cambridgeshire and Peterborough Local Nature Recovery Strategy. In addition, Policy NH/4 of the South Cambridgeshire Local Plan prevents development that results in the deterioration or fragmentation of habitats, and requires new development to

maintain, enhance and restore biodiversity. Similarly, Policy 70 of the Cambridge City Local Plan requires development to protect and enhance habitats and species. The new Local Plan provides the opportunity to enable biodiversity gain and to improve the overall LNRS. Improvements to GI can have a wider range of benefits beyond biodiversity, such as adapting to climate change, acting as a carbon sink and improving mental and physical health and wellbeing.

- Relevant SA objectives: SA objective 5, SA objective 11

Historic Environment

Policy Context

International

B.435 United Nations (UNESCO) World Heritage Convention (1972) [See reference 435]: Promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

B.436 Valletta Treaty, formerly the European Convention on the Protection of Archaeological Heritage (1992) [See reference 436]: Agreed that the conservation and enhancement of an archaeological heritage is one of the goals of urban and regional planning policy. It is concerned in particular with the need for co-operation between archaeologists and planners to ensure optimum conservation of archaeological heritage.

B.437 European Convention for the Protection of the Architectural Heritage of Europe (1985) [See reference 437]: Defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

National plans and programmes (beyond the NPPF) of most relevance to the Local Plan

B.438 Historic England, Corporate Plan 2023-2026 (2023) [See reference 438]: Contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will

continue to work towards delivering the heritage sector's priorities for the historic environment.

B.439 The Environment Act 2021 [See reference 439]: Sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation. This can include to preserve land as a place of 'archaeological, architectural artistic, cultural or historic interest.'

B.440 The Heritage Statement (2017) [See reference 440]: Sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

B.441 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) [See reference 441]: Sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

B.442 The Government's Statement on the Historic Environment for England (2010) [See reference 442]: Sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

B.443 Planning (Listed Buildings & Conservation Areas) Act 1990: An Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

B.444 Ancient Monuments & Archaeological Areas Act 1979: A law passed by the UK government to protect the archaeological heritage of England & Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

B.445 Historic Buildings and Ancient Monuments Act 1953 [See reference 443]: An Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Sub national

B.446 South Cambridgeshire Village Design Guides (since 2018) [See reference 444]: Since 2018 the Council has been working with eight villages to produce Design Guides, funded by central government, with the goal of raising the quality of new planned development. Once adopted, they will become supplementary planning documents (SPDs). Each guide describes the distinctive character of the village and sets out guidelines for how it should be enhanced.

B.447 Cambridgeshire Green Infrastructure Strategy (2011) [See reference 445]: Outlines how the broader historic environment makes an important contribution to sense of places, sense of time and local identity and distinctiveness. The challenges highlighted including the impact of farming, the impact of climate change and development, lack of visibility of some assets, and conflicts between conservation and public access. An updated Green Infrastructure Strategy is currently being prepared.

B.448 South Cambridgeshire Listed Buildings SPD (2009) [See reference 446]: This document forms part of the Local Development Framework (LDF) to ensure that Listed Building issues are adequately addressed throughout the development process. This expands on the broad policies set out in the Development Control Policies.

B.449 South Cambridgeshire Development Affecting Conservation Areas SPD (2009) [See reference 447]: expands on district-wide policies to provide additional guidance on developments affecting designated Conservation Areas, and to assist applicants' understanding of the local historic context to ensure that development preserves and, where possible, enhances their character.

B.450 Cambridge Historic Core Appraisal (2006) **[See reference 448]:** The 'historic core' is part of the large Central Conservation Area No.1, which is one of a number within Cambridge but deemed to be of particular historic interest. The Appraisal recognises that large parts of the floodplain and the setting of the River Cam are highly significant to the historic environment, as well as Jesus Green and Midsummer Common. In 2018 the large Central Conservation area was split into six smaller, separate areas.

B.451 Conservation Area Appraisals and Management Plans [See reference 449], [See reference 450**]**: These appraisals describe the character and significance of Conservation Areas and give recommendations for their conservation and enhancement.

Current Baseline

B.452 Greater Cambridge has a rich and varied historic environment and hosts a number of heritage assets. The city of Cambridge is renowned worldwide for its historic environment, which defines the character of the city and makes it a popular tourist destination **[See reference 451]**. The historic environment can also make a significant contribution to the success of development and there may be opportunities in the plan area for the enhancement of the historic The historic environment can also make a significant contribution to the success of development and there may be opportunities in the plan area for the enhancement of the historic environment, including its role in creating a sense of place, promoting tourism and promoting innovative reuse of building stock.

B.453 The historical development of South Cambridgeshire has been closely associated with Cambridge and the communication network (river crossings and road junctions), the avoidance of flooding, and developments in agriculture. South Cambridgeshire was a key location on east-west trading routes, with the Icknield Way in the south east a particularly notable historic routeway. The markets towns and historic villages are mostly linear in form, despite modern infilling in some villages, particularly in villages close to Cambridge **[See reference 452]**.

B.454 There are 2,693 listed buildings in South Cambridgeshire. This is an increase of one on the previous year's monitoring report with the new listed building being a Grade II listed building rear of Bwthyn Bach. There are currently 49 buildings at grade I, 172 at grade II* and 2,472 at grade II. Of these 2,693, only five are on the Historic England Heritage at Risk register, all of which are Churches, this is the same number as was recorded in the previous monitoring year.

B.455 There are also 109 Scheduled Monuments and 12 Historic Parks and Gardens in South Cambridgeshire. The district has a total of 85 Conservation Areas. These numbers have not changed over recent years **[See reference** 453**]**.

B.456 Cambridge's historic and natural environment defines the character and setting of the city and contributes significantly to quality of life. Cambridge has 838 listed building entries on the National Heritage List for England. This is an increase of one since the 2023-2024 AMR with a K6 Telephone Kiosk in St Andrews Street added at grade II. There are 67 grade I listed buildings in the city of Cambridge. The grade II* buildings remain at 54. This brings the most recent total number of Grade II Listed Buildings to 717.

B.457 For the size of the city, Cambridge has a greater than average number of higher-grade buildings. Some of the entries, such as those for the colleges or

terraced houses include more than one building or property; therefore, the overall number of buildings is considerably higher.

B.458 Cambridge has two Listed Building entries on the Historic England Buildings at Risk Register **[See reference** 454**]**:

- The Old Cheddars Lane Pumping Station; and
- Stourbridge Chapel on Newmarket Road.

B.459 This is a decrease of one from the previous year's list with the removal of the Church of St Andrew the Less on Newmarket Road.

B.460 Cambridge also has six Scheduled Monuments and 12 Historic Parks and Gardens. There are 17 Conservation Areas designated in the city. This represents 23.7% of the city's area, and it totals 965 hectares **[See reference** 455**]**.

B.461 In addition, Cambridge City Council has identified over 1,500 buildings non-designated heritage assets. These are assets which do not meet the criteria for statutory listing, but which are of local interest for their architectural merit or historical associations **[See reference 456]**. There may be further non-designated and unknown heritage assets across the plan area.

B.462 Existing Listed Buildings and Conservation Areas and Scheduled Monuments and Registered Parks and Gardens present within the plan area are illustrated in Figures B.11a and B.11b, respectively.

Figure B.11a: Listed Buildings and Conservation Areas

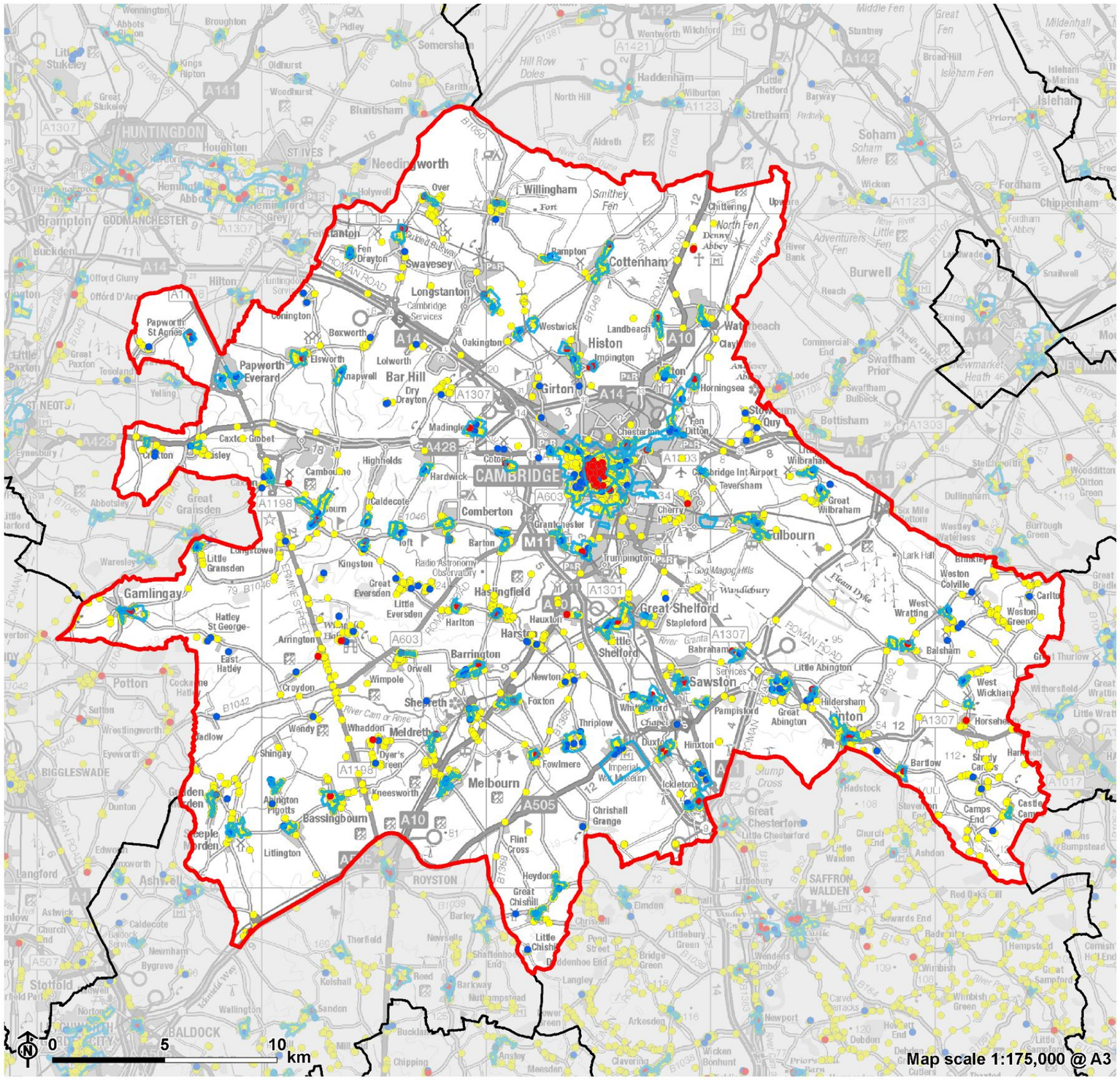
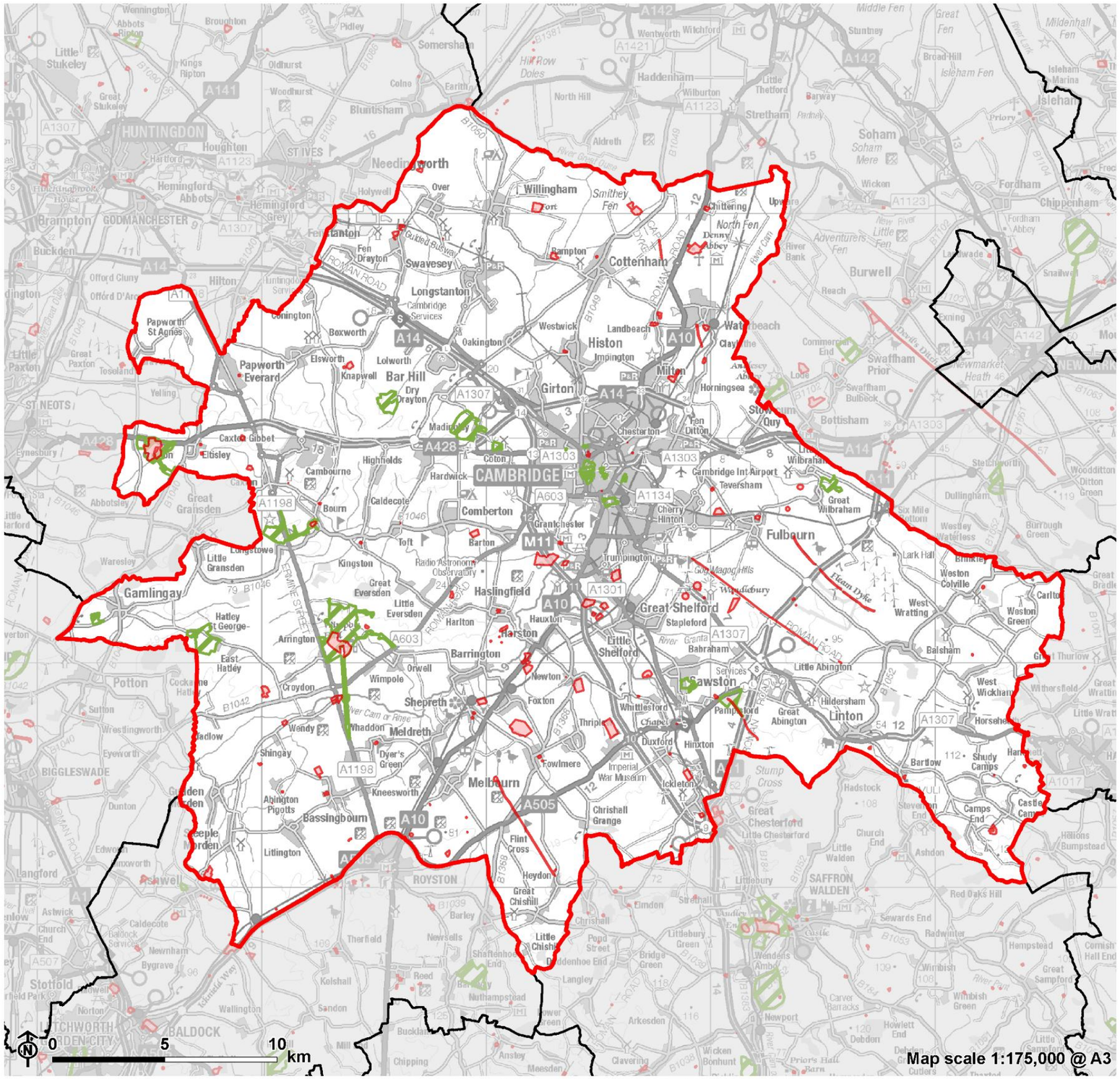

HUNTINGDON
CAMBRIDGE
Needingworth
Willingham
Cottenham
Swavesey
Longstanton
Papworth Everard
Bar Hill
Girton
Histon
Impington
Landbeach
Waterbeach
Burwell
Soham
Fordham
Chippenham
Newmarket
Haddenham
Stretham
Ely
Littleport
Bottisham
Swaffham Prior
Swaffham Bulbeck
Horningsea
Fen Ditton
Cambridge Int Airport
Teversham
Great Wilbraham
Fulbourn
Cherry Hinton
Great Shelford
Stapleford
Sawston
Little Abington
Hildersham
Linton
Balsham
Duxford
Hinxton
Whittlesford
Pampisford
Great Abington
Babraham
Trumpington
Grantchester
Comberton
Barton
Harlton
Haslingfield
Harston
Barrington
Orwell
Wimpole
Newton
Foxton
Thriplow
Melbourn
Meldreth
Shepreth
Fowlmere
Chrishall Grange
Great Chishill
Little Chishill
Heydon
Flint Cross
Ickleton
Great Chesterford
Little Chesterford
SAFFRON WALDEN
ROYSTON
BALDOCK
Gamlingay
Potton
Sandy
Biggleswade
Ashwell
Stotfold
Arrington
Croydon
Wimpole
Shingay
Abington Pigotts
Bassingbourn
Litlington
Kneesworth
Whaddon
Wendy
Dyer's Green
Hatley St George
East Hatley
Great Eversden
Little Eversden
Kingston
Caldecote
Highfields
Hardwick
Cambourne
Madingley
Oakington
Boxworth
Conington
Papworth St Agnes
Elsworth
Knapwell
Lolworth
Dry Drayton
Fen Drayton
Swavesey
Longstanton
Cambridge Services
Over
Holywell
Needingworth
Somersham
Pidley
Earith
Colne
Bluntisham
Woodhurst
Oldhurst
Kings Ripton
Houghton
Hemingford Abbots
Hemingford Grey
Huntingdon
St Ives
Brampton
Buckden
Offord Cluny
Offord D'Arcy
Hilton
Godmanchester
Great Stukeley
Little Stukeley
Broughton
Wennington
Abbots Ripton
Woodhurst
Colne
Somersham
Pidley
Earith
Bluntisham
Aldreth
Stuntney
Middle Fen
Great Fen
Mildenhall Fen
Isleham
Isleham Marina
Broad Hill
Isleham Fen
Priory
Wicken
Soham Mere
Adventurers Fen
Little Fen
River Bank
Burwell Fen
Reach
Commercial End
Swaffham Prior
Bottisham
Lode
Quy
Stow cum Quy
Dullingham
Six Mile Bottom
Westley Waterless
Burrough Green
Woodditton
Ditton Green
Stetchworth
Dullingham
Lark Hall
Brinkley
Weston Colville
Carlton
Weston Green
West Wratting
Balsham
West Wickham
Horseheath
Shudy Camps
Castle Camps
Camps End
Bartlow
Hadstock
Stump Cross
Great Chesterford
Little Chesterford
Church End
Ashdon
Littlebury
Littlebury Green
Saffron Walden
Elmdon
Arkesden
Clavering
Wicken Bonhunt
Newport
Priors Barn
Cutlers
Carver Barracks
Wimbish
Wimbish Green
Hempstead
Great Sampford
Red Oaks Hill
Seward's End
Radwinter
Cornish Hall End
Bumpstead
Castle Camps
Shadwell
Ely
Littleport
Chippenham
Fordham
Isleham
Soham
Burwell
Newmarket
Haddenham
Stretham
Wilburton
Little Thetford
Barway
Aldreth
Willingham
Smithey Fen
Fort
Chittering
Upware
North Fen
Denny Abbey
River Cam
Adventurers Fen
Little Fen
River Bank
Burwell Fen
Reach
Commercial End
Swaffham Prior
Bottisham
Lode
Quy
Stow cum Quy
Dullingham
Six Mile Bottom
Westley Waterless
Burrough Green
Woodditton
Ditton Green
Stetchworth
Dullingham
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Brinkley
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Weston Green
West Wratting
Balsham
West Wickham
Horseheath
Shudy Camps
Castle Camps
Camps End
Bartlow
Hadstock
Stump Cross
Great Chesterford
Little Chesterford
Church End
Ashdon
Littlebury
Littlebury Green
Saffron Walden
Elmdon
Arkesden
Clavering
Wicken Bonhunt
Newport
Priors Barn
Cutlers
Carver Barracks
Wimbish
Wimbish Green
Hempstead
Great Sampford
Red Oaks Hill
Seward's End
Radwinter
Cornish Hall End
Bumpstead
Castle Camps
Shadwell
A14
A10
A11
A1307
A1303
A1123
A142
A1421
A1301
A603
A428
A1198
A1309
A1303
A1307
A1017
A505
A426
A507
M11
A1
A1307
A1303
A1307
A1017
A1307
A1307
A1307

Figure B.101b: Scheduled Monuments and Registered Parks and Gardens



Regulation 19 Sustainability Appraisal
Cambridge City Council and South Cambridgeshire District Council

LUC

Figure B.11b : Scheduled Monuments and Registered Parks and Gardens in Greater Cambridge

- Greater Cambridge boundary
- Neighbouring local authority
- Scheduled monument
- Registered Parks and Gardens

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Key sustainability issues for Greater Cambridge and likely evolution without the new Local Plan

- Key issues: There are many sites, features and areas of historical and cultural interest in the plan area, both designated and non-designated. A number of these are at risk and identified on the Heritage at Risk Register. In the context of significant ongoing pressures for development locally, these assets, and their landscape setting, may be at risk of adverse effects from poorly located or designed development, particularly in areas where there is likely to be a significant loss or erosion of landscape or townscape quality due to development.
    - Likely evolution: A number of the heritage assets in the plan area, for example listed buildings and scheduled monuments, will continue to be protected by statutory designations, and existing Local Plan policies provide further protection, for example Policy NH/14 of the adopted South Cambridgeshire Local Plan sets out to ensure that development sustains and enhances the character of the historic environment and creates high quality new environments with a strong sense of place by responding to local heritage character. In addition, locally specific policies outline specific heritage assets to be protected. Policies 61 and 62 of the adopted Cambridge Local Plan seek to protect and enhance the city's historic environment and are supported by Policies 55-59 which safeguard local character. However, without the new Local Plan it is possible that these assets will be adversely affected by inappropriate development. This is because the new plan will be developed on the basis of a different baseline of expected growth, which may put these assets (including their setting) under increased pressure.
    - Relevant SA objectives: SA objective 6, SA objective 7
- Key issues: Heritage assets in the plan area which are at risk from decay and neglect may also be affected by traffic-related impacts, including air quality and noise pollution.
    - Likely evolution: Policies SC/12 of the South Cambridgeshire Local Plan requires applicants to ensure that new development does not result in adverse impacts on air quality. Policy SC/10 requires that development does not have an unacceptable adverse impact on countryside areas of tranquillity important for countryside recreation. Policy 36 of the Cambridge Local Plan requires developers to ensure they have no adverse effects on air quality, and Policy 35 requires that development does not have an adverse effect on

amenity from noise and vibration. However, without a new Local Plan, developed on the basis of updated evidence and development trajectories, heritage assets and their settings may be put at further risk. The new Local Plan presents an opportunity to address potential harm to the historic environment from these indirect effects in a more holistic way.

- Relevant SA objectives: SA objective 6, SA objective 7, SA objective 13

Landscape

Policy Context

International

B.463 European Landscape Convention (2002): Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National plans and programmes (beyond the NPPF) of most relevance to the Local Plan

B.464 The Environment Improvement Plan 2023 [See reference 457] for England is the first revision of the 25YEP: It builds on the 25YEP vision with a new plan setting out how we will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve its vision, the 25YEP set out 10 goals. We have used those 10 goals set out in the 25YEP as the basis for this document: setting out the progress made against all 10, the specific targets and commitments made in relation to each goal, and our plan to continue to deliver these targets and the overarching goals. The environmental goals are:

- Goal 1: Thriving plants and wildlife
- Goal 2: Clean air
- Goal 3: Clean and plentiful water
- Goal 4: Managing exposure to chemicals and pesticides

- Goal 5: Maximise our resources, minimise our waste
- Goal 6: Using resources from nature sustainably
- Goal 7: Mitigating and adapting to climate change
- Goal 8: Reduced risk of harm from environmental hazards
- Goal 9: Enhancing biosecurity
- Goal 10: Enhanced beauty, heritage, and engagement with the natural environment

B.465 Environmental Improvement Plan annual progress report (2025) **[See reference** 458**]**: Sets out the progress made in improving the environment through the 25 Year Plan and the indicator framework, which contains 66 indicators arranged into 10 broad themes.

B.466 Working with nature (2022) **[See reference** 459**]**: Discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England's habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

B.467 The Environment Act 2021 **[See reference** 460**]** – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.

- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

B.468 Climate Change Adaptation Manual (2020) [See reference 461]: A resource to support practical and pragmatic decision-making relating to climate change adaptation. The manual brings together recent science, experience and case studies to be used by managers of nature reserves and other protected sites, conservation and land management advisors, and environmental consultants.

B.469 Landscapes Review (2019) [See reference 462]: Explores the fragmented and often marginalised system of managing National Parks and AONBs recommends actions to achieve structural reform. The review looks at:

- The existing statutory purposes for National Parks and AONBs and how effectively they are being met.
- The alignment of these purposes with the goals set out in the 25 Year Environment Plan.
- The case for extension or creation of new designated areas.
- How to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets.
- The financing of National Parks and AONBs.
- How to enhance the environment and biodiversity in existing designations.
- How to build on the existing eight point plan for National Parks and connect more people with the natural environment from all sections of society and improve health and wellbeing.
- How well National Parks and AONBs support communities.
- The process of designating National Parks and AONBs and extending boundary areas, with a view to improving and expediting the process.

B.470 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [See reference 463]: Protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

B.471 Green Future: Our 25 Year Plan to Improve the Environment (2018) [See reference 464]: Sets out goals for improving the environment within the next 25

years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

B.472 Countryside and Rights of Way Act 2010 [See reference 465] An Act of Parliament to make new provision for public access to the countryside.

B.473 National Parks and Access to the Countryside Act 1949 [See reference 466]: An Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

Sub national

B.474 East of England Landscape Typology [See reference 467]: The East of England Landscape Character Typology draws on a range of data, including Landscape Character Assessment, Historic Landscape Characterisation, biodiversity and rural settlement data sets, as well as data generated through consultation. It provides a finer grain of detail on landscape character than the national-level Character Areas.

B.475 Greater Cambridge Landscape Character Assessment (2021) [See reference 468]. The Landscape Character Assessment offers a common framework and source of baseline information about the Greater Cambridge landscapes within the Study Area. This framework provides a basis for adopting an integrated, positive approach to managing landscape change by all those involved with, or that have an interest in, the planning, design and management of the Greater Cambridge landscape.

B.476 Cambridgeshire Green Infrastructure Strategy (2011) [See reference 469]: The Strategy was designed to assist in shaping and co-ordinating the delivery of Green Infrastructure across the county of Cambridgeshire, in order to provide the social, environmental and economic benefits associated with GI. It covers the period up to 2031. The Project Group consisted of the County Council, the individual District

Councils, as well as a number of external bodies including Natural England and the local Wildlife Trust. The Strategy notes that enhancing landscape is one of the key functions of Green Infrastructure and the diversity of the landscape, giving an overview of the existing range of landscapes and habitats, including prominent ones such as the Ouse and Nene Washes. A new Green Infrastructure Strategy is being prepared for the new Greater Cambridge Local Plan.

B.477 Cambridge Landscape Character Assessment (2003) [See reference 470]: Carried out to create a 'baseline' statement of qualities and character in the city in order to ensure the character of the city is maintained. It sought to indicate areas or features with are important to the setting of Cambridge and should remain undeveloped, and to describe the essential character of the townscape and its rural hinterland, to guide judgements on new development. A new Landscape Character Assessment is being prepared by both Councils for the new Local Plan.

B.478 South Cambridgeshire Landscape in New Developments SPD (2007) [See reference 471]: expands on district-wide policies to provide additional guidance for planning applicants on how landscape should be integrated into new developments.

Current Baseline

B.479 Cambridgeshire as a whole is largely rural and is predominantly a farmed landscape, with three-quarters of the county devoted to the production of food, fuel and fibre. The landscape is characterised by smooth, rolling chalkland hills and is predominantly open, allowing for long views.

B.480 Greater Cambridge is generally relatively sparsely populated, with settlements generally located along river valleys and more recently along road and rail corridors. However, the city of Cambridge is an historic, urban hub within the wider landscape. Major transport corridors (notably the M11, A14 and rail corridors) run through the plan area. Along with historical and ongoing pressure for development, landscape assessments highlight that this is likely to further reduce the tranquillity of the area as a whole **[See reference 472]**.

B.481 There are no designated landscape areas within or immediately adjacent to the plan area. The Chilterns National Landscape lies around 15 km from the area's westernmost point, and as such it is unlikely that development in this area will have an effect on the landscape setting of the National Landscape, although this may depend on the topography of any individual site.. The 2011 Green Infrastructure Strategy noted that key challenges for the county include the need for long-term investment and the erosion of landscape quality from changing land use and development.

B.482 A Landscape Character Assessment was undertaken for Greater Cambridge in 2021. This identifies and records the patterns, features and elements of the various generic types of landscape and areas of distinctive character in Greater Cambridge that contribute to making one landscape different from another. It is these factors that contribute to defining local distinctiveness and sense of place. **[See reference** 473**] [See reference** 474**]**

B.483 The Assessment identifies nine Landscape Character Types (LCTs) across Greater Cambridge and identifies both the condition and character of each of these. The Landscape Character Types, condition and character are as follows:

- **The Fens.** The Fens LCT forms part of the extensive and distinctive low-lying, flat and open fenlands with long views and large, dramatic skies, extending northwards through Cambridgeshire to The Wash. The Fens LCT is an intensively farmed LCT. However, it remains rich in geodiversity and archaeology. The landscape has a strong, distinctive geometric/rectilinear landscape pattern that is a result of a long history of land management that also provides an important ecological network. The overall condition of the landscape is perceived to be good. This is a landscape of strong character. The flat, low-lying landform with distinctive hierarchy of drainage channels, regular field pattern and limited settlement with sparse tree cover create a landscape with a sense of remoteness and tranquillity. The strong character also relates to the historic associations and various features present in the landscape including historic driveways, dykes and lodes.
- **Fen Edge Claylands.** The Fen Edge Claylands LCT is a transitional, predominantly arable landscape with large scale, open fields, orchards and villages built on “islands” of high ground. The Fen Edge Claylands is an intensively farmed LCT with limited ecological value. The hierarchy of drainage channels and historic tracks and droves connecting between the settlements and The Fens to the north are generally intact historic landscape features that contribute to the value of this landscape. The overall condition of the landscape is perceived to be moderate. This is a peaceful rural landscape judged to be of moderate strength of character with few distinguishing features. Traditional orchards are a feature of this landscape. However, this network is declining in places due to development and farming pressures. The historic linear form of the Fen Edge villages is generally retained. Modern estates have altered the overall form of the settlements, although are generally well integrated by hedgerows, copses and shelterbelts where appropriate.
- **Lowland Farmlands.** The Lowland Farmlands LCT is a gently undulating, intensively farmed arable landscape encompassing densely settled, wide, flat river valleys and their tributaries. It maintains a tranquil and rural character due

to the dispersed hierarchy of settlements from large villages to outlying farmsteads. Scattered small scale woodlands are a distinctive feature that have lost some connectivity through changes in land use. The overall condition of the landscape is perceived to be moderate. The landscape is judged to be of moderate strength of character with few distinguishing features. Moated sites and small, scattered woodlands are particular features of this landscape, often located within and around the edges of the village settlements. Modern expansion of the villages has been limited across much of this LCT, with some sprawl taking place along major transport routes to the south of Cambridge.

- **Wooded Claylands.** The Wooded Claylands LCT are rolling, elevated, settled rural plateaux with shallow valleys which are characterised by low density villages and open views framed by areas of woodland. The condition of the landscape is generally judged to be good. The landscape has a generally well-kept appearance with strong linkages of hedgerows/woodland, often maintained by the influence of parklands and estates. Arable farming has altered the field pattern in places through removal of hedgerow and ditch boundaries, although there is evidence of more recent improved management. The Wooded Claylands are largely a peaceful, rural landscape with intact hedgerows, woodland and small villages and scattered farms of vernacular materials. There is localised influence from major transport routes and new, large settlement and extension of villages along them. However, the overall strength of landscape character is judged to be strong.
- **Wooded Greensand Ridge.** The Wooded Greensand Ridge LCT covers a small area of a well wooded, elevated narrow ridge with a dispersed pattern of settlements, continuing southwest of the Study Area into Bedfordshire. The landscape possesses a moderate degree of intactness, with good survival and management of woodland but some neglect of estates within the Study Area. There are a variety of habitats across this LCT, with a number of designated nature sites that are well managed. The condition of the landscape is generally judged to be moderate. This is a landscape of generally strong character as a result of its distinct and recognisable pattern of elements that contribute to the settled, wooded ridgeline. It is a textured landscape with strong sense of enclosure that contrasts with the adjoining open Claylands.
- **Fen Edge Chalklands.** The Fen Edge Chalklands LCT is a settled, transitional landscape with scattered villages and historic parkland, characterised by long, open views over predominantly arable fields between the low-lying Fens and rising land to the east and southeast of Cambridge. The Fen Edge Chalklands is an intensively farmed LCT with limited ecological value. Within the farmed landscape there are pockets of priority habitat and nationally important sites that are connected in places by linear features including trees along watercourses

and tracks. Hedgerows are largely trimmed low and gappy. The overall condition of the landscape is perceived to be moderate. This is a peaceful rural landscape judged to be of moderate strength of character with few distinguishing features. It is a large-scale landscape with long views across open fields. The traditional qualities of the settlements are largely intact, with limited expansion/intrusion on the rural landscape.

- **Chalk Hills.** The Chalk Hills Landscape Character Type (LCT) forms an arc of prominent, elevated hills across the central and southern part of the Study Area. Chalk hills and scarps form distinctive rising landform beyond the Fen Edge Chalklands to the southeast of Cambridge, south of the Lowland Chalklands along the southern boundary of the District and north of the Lowland Farmlands in the west of the Study Area. There is also a small outlier across the Newton Hills to the south of Cambridge. The landscape of the Chalk Hills has been altered by relatively recent changes in agriculture, with some scattered pasture remaining between swathes of large arable fields. The farmed landscape is punctuated by scattered blocks of woodland that break up the skyline of the ridges of the upland landscape. The rural qualities and particularly the historic settlement pattern is largely intact. The overall condition of the landscape is perceived to be good. The Chalk Hills is a relatively simple, uninterrupted and tranquil landscape with distinctive, long distance and often wide views across the lower lying landform of Greater Cambridge. There is some localised intrusion from major transport routes and expansion of settlement in adjoining LCTs that interrupt views in places. Overall, it is judged that the Chalk Hills LCT has a strong character.
- **Lowland Chalklands.** The Lowland Chalklands Landscape Character Type (LCT) is an intensively farmed arable landscape forming the gently rising transition between the Lowland Farmlands and the Chalk Hills. It is well settled, due to historic and modern communication links. The Lowland Chalklands is a productive agricultural landscape with limited ecological value. Within the farmed landscape there are fragments of chalk grassland and scattered, small woodlands that are linked by hedges that are particularly intact in proximity to settlements. There are a variety of historic and cultural features scattered across the LCT, including a number of protected sites. The overall condition of the landscape is perceived to be moderate. The Lowland Chalklands is a settled, rural landscape comprising dispersed, historic villages separated by open countryside with little tree cover and a sense of tranquillity. There is localised intrusion from major transport routes and larger, expanded villages along them. Overall, this landscape is judged to have moderate strength of character.

- **River Valleys.** The River Valleys Landscapes Character Type (LCT) is located along the floodplains of three rivers within the Study Area, namely River Cam, River Rhee and River Granta. Its character is intimate and small scale, derived from a pattern of flat grazing meadow and wet woodland.

B.484 In addition to the 2021 Landscape Character Assessment, the Council's plan to commission a Green Belt and updated Landscape Character Assessment as part of an updated evidence base.

B.485 At a national level, parts of five different National Character Areas (NCAs) lie within the plan area, as illustrated in Figure B.11. The Greater Cambridge landscape classification broadly nests within this framework:

- The majority of the western half (washing over the city of Cambridge) is characterised by NCA 88 Bedfordshire and Cambridgeshire Claylands, a broad and gently undulating landscape dominated by large-scale arable farmland and rich in historical features. It is dissected by shallow river valleys, including the Great Ouse on the northern boundary of Greater Cambridge, which gradually widen as they approach the Fens NCA in the east **[See reference 475]**.
- Most of the eastern and southern parts of the area are identified as NCA 87 East Anglian Chalk. While historically this area was grazed by sheep, today large-scale cereal production (mainly wheat) now dominates the agricultural landscape. The porous chalk that underlies the landscape results in limited surface water.
- Three further NCAs cover smaller areas of the plan area. These include NCA 86 South Suffolk and North Essex Claylands in the far east of the area (an undulating ancient landscape of wooded arable countryside with numerous river valleys); **[See reference 476]** NCA 46 The Fens on the north eastern border (a distinctive wetland with a large, flat and open landscape, resulting in a strong sense of place, tranquillity and inspiration); and NCA 90 Bedfordshire and Greensand Ridge on the western boundary around Gamlingay (a narrow ridge surrounded by NCA 88, characterised by historic landscapes and a patchwork of semi-natural habitats) **[See reference 477]**.

B.486 The East of England Landscape Character Typology identifies Regional Landscape Character Types defined by Natural England. The landscape of Greater Cambridge is represented at the regional level by ten Regional Landscape Character Types. This provides further, more granular assessment of the landscape types in the region, both urban and rural. The Greater Cambridge landscape classification broadly nests within this framework **[See reference 478]**.

B.487 In the south of Greater Cambridge, near the border with Uttlesford, the major prehistoric routeway of the Icknield Way (a long-distance footpath) traverses the south west corner of South Cambridgeshire and is a distinctive landscape feature as well as having value for the historic environment.

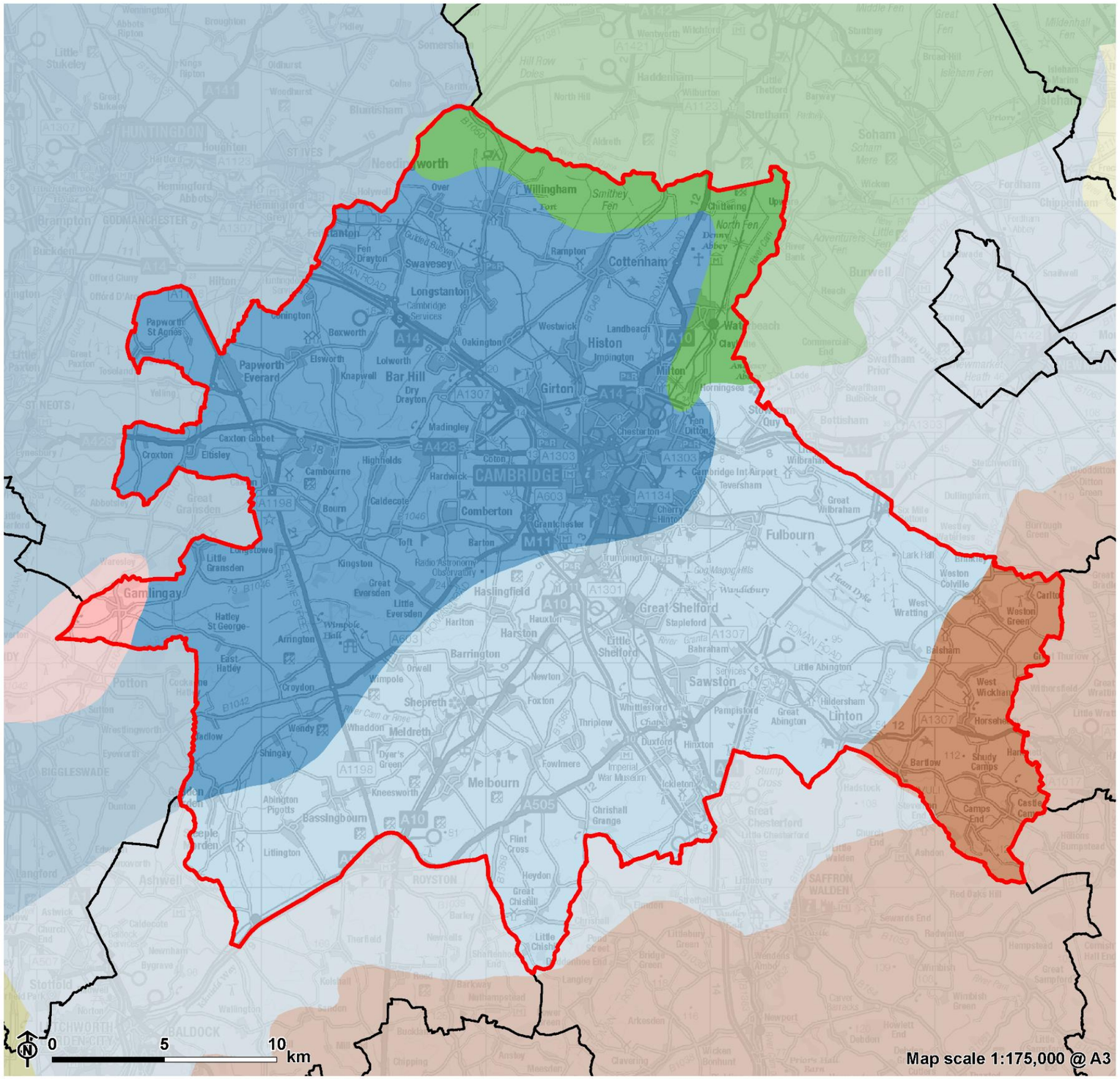
B.488 Skylines of cities evolve and change over time in response to increasing urban expansion and renewal. The Cambridge skyline has also undergone this process incrementally. Within the historic core, there is a great variety of rooflines, articulated by spires, cupolas, chimneys and towers **[See reference 479]**. Trees also form an important element in the modern Cambridge skyline, within both the historic core and the suburbs. Many of the elevated views of the city from the rural hinterland and from Castle Mound show a city of trees with scattered spires and towers emerging above an established tree line. The character of the more urbanised environment within Cambridge City is described in the 2003 Cambridge Landscape Assessment, which identifies 7 landscape character types within the city **[See reference 480]**. It describes the uniqueness of the city landscape, as a mosaic of built areas interspersed with a network of open spaces. It is a compact city with a strong sense of identity, while the setting is largely 'unexceptional arable lowland' but with some attractive aspects. 'Green fingers' such as The Backs are identified as an important feature, linking the hinterland with the historic core. Water is also identified as a key landscape feature in the city. In general the character areas describe a historic city centre and 'borrowed landscapes' of college gardens and cemeteries, surrounded by a mixed residential landscape and some ancient villages, followed by a 'rural lowland mosaic', all dissected by the corridor of the River Cam and rail and road corridors. Some of the outer parts of the city are characterised by poorer quality suburban housing developments, and former industrial and utilities land **[See reference 481]**.

B.489 The Ouse Washes Landscape Character Assessment helps to describe in more detail the character of the distinctive landscape on the northern boundary of South Cambridgeshire. The area overlapping with Greater Cambridge is identified as the 'Ouse Valley Wetlands' – a broad flat floodplain of the River Great Ouse and its surrounding clay margins. The Great Ouse is now channelled between embankments and gravel extraction on its floodplain has transformed the former waterlogged fen into a cluster of lakes. Higher land on the margins of the fen hosts a string of villages with a hinterland of paddocks, orchards and farmsteads. The study finds that this part of the Ouse Washes landscape can accommodate change provided new development is not extensive and that protects sensitive features including historic tracks, other historic features, and land uses on the fringe of villages.

B.490 Cambridge City is surrounded by Green Belt, most of which lies within South Cambridgeshire district. There has been no change in the total area covered by Green Belt in Cambridge City (973ha) and South Cambridgeshire (23,218ha) in the

five year period ending 2024-2025 **[See reference** 482**]**. Green Belt is a policy designation, rather than a sustainability designation, which has its own defined purposes and is considered separately to the SA.

Figure B.112: National Character Areas



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Figure B.12 : National Character Areas in Greater Cambridge

Greater Cambridge boundary
Neighbouring local authority

National Character Area

- 46: The Fens
- 85: The Brecks
- 86: South Suffolk and North Essex Clayland
- 87: East Anglian Chalk
- 88: Bedfordshire and Cambridgeshire Claylands
- 90: Bedfordshire Greensand Ridge
- 110: Chilterns

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Key sustainability issues for Greater Cambridge and likely evolution without the Local Plan

- Key issues: While the plan area is not in close proximity to nationally designated or highly sensitive landscape areas, it contains a diverse range of locally, regionally and nationally recognised landscape character types/areas that could be harmed by inappropriate development. For example, the fenlands on the northern boundary of Greater Cambridge are particularly sensitive to development. If development was to be allocated there it could threaten losses to a distinctive wetland landscape.
  - Likely evolution: While the plan area is not in close proximity to nationally designated or highly sensitive landscapes, it does contain a diverse range of nationally recognised landscape character areas that could be harmed by inappropriate development. For example, the fenlands on the northern boundary of Greater Cambridge are particularly sensitive to development. If development was to be allocated there it could threaten losses to a distinctive wetland landscape.
  - Relevant SA objective: SA objective 6
- Key issues: The distinct historic character of the South Cambridgeshire villages, and in particular the sensitive historic landscape setting of Cambridge requires protection as development comes forward. Particular regard should be had to maintaining key views into Cambridge.
  - Likely evolution: Policy NH/13 of the South Cambridgeshire Local Plan requires definition along important countryside frontages where land has a strong landscape character, while Policy 59 of the Cambridge City Plan requires that landscape and boundary treatment are designed as an integral part of new development proposals. Further, Policy 60 sets out criteria for assessing buildings breaking with the existing skyline, which should fit within the existing landscape and townscape. The new Local Plan provides an opportunity to ensure that, in the context of ongoing development pressures, development coming forward does not adversely affect the setting of sensitive heritage assets and lies sympathetically within the existing landscape and townscape.
  - Relevant SA objectives: SA objective 6

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