Appendix 3: Sustainability Appraisal Scoping Report – Statutory Consultee Comments

Sustainability Appraisal Scoping Report – Comments Received from Statutory Consultees Prior to Issues and Options 2020.

In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Environment Agency, Historic England and Natural England) were sought in relation to the scope and level of detail to be included in the Sustainability Appraisal Scoping Report.

The comments received are reported and responded to the in the Sustainability Appraisal Scoping Report itself.

The Environment Agency

The Environment Agency welcomes the opportunity to feed into the scope of the Sustainability Appraisal at this early stage.

We refer to the draft SA scoping report prepared by LUC.

In scoping the issues and assessing the wider context and some cross-boundary issues, we recommend referring to the emerging draft shadow SEA for the OxCam growth arc when it is available. This may provide a succinct and comprehensive assessment of some of the high level issues and have a high degree of relevance to the Greater Cambridge Local Plan area and related cross-boundary/larger than local planning issues.

In 2.5 the NE fringe AAP is potentially significant.

In 2.6 Waterbeach is nearer 11,000 homes taking into account planning applications, one of which is approved in outline.

Structure of Air, land and water topics relative to natural capital

In relation to the structure of the report, we appreciate that Natural Capital is a current and future focus, and advise that this should be reflected in the SEA process and report. Whilst a broad topic, Integrated Water Management can be a sub-topic. Air quality is the least related in the current chapter and we recommend it could be moved out (better paired with transport given intrinsic links and lack of 'industry-related' air quality issues around Cambridge). Land and water have substantially more in common with biodiversity and green infrastructure which we would like to see these more closely linked for ease of cross reference and cross-cutting issues.

Section 6: Air, Land, Water

Objectives for water bodies in the Greater Cambridge plan area and targets for achievement of good status by 2027 are set out in the current Anglian RBMP. These objectives and targets are important considerations for growth planning due to the impacts of treated wastewater from new development and, to a lesser extent for planning, changes to agricultural land use and development run-off. Agricultural land use changes may be influenced by an exit from the EU and the impacts are therefore not yet clear. However impacts from climate change are rather better understood with predicted lower overall precipitation, particularly in summer months along with wetter, stormier winters.

There is a close relationship between water resources (with abstraction for domestic consumption and agriculture, along with climate change) and water quality. If there is less dilution in the watercourses (whether year round or seasonal), wastewater may need treating to a higher standard. An integrated study will need to consider these factors in the Greater Cambridge context.

Integrated Water Management

Given the integral nature of water resources, water quality, flood risk and drainage, the Environment Agency advises that these issues are indivisible in the context of Greater Cambridge. We strongly recommend an Integrated Water Management Study (IWMS) that combines a Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) as a combined project, parts of which could run in parallel with other parts integrated. Given the breadth and overlap of stakeholders in managing water, it is likely that these will need to be elements of strategy in the evidence to illustrate how infrastructure and mitigation might be delivered between partners.

CIRIA is about to produce some guidance on integrated water management planning, which includes both technical recommendations (scope, evidence, policy content, structure etc) and also organisational recommendations around ‘critical success factors’ governance, leadership, breadth of stakeholders. We recommend that these critical success factors should be planned into both the scope of the project, its steering membership, governance and commitment.

In 6.6 the RBMP needs to make reference to enhancement and the objective for all water bodies to achieve good status by 2027.

Climate change

The most appropriate NPPF Paragraphs to list in 6.9 are:

149: Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

150. New development should be planned for in ways that:

a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure;

Paragraph 170: Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account

In 6.10 the relevant sections of the PPG to water services infrastructure should be listed/summarised.

After 6.33, Catchment Abstraction Management Plans need to be listed and the pertinent issues summarising.

6.34 is out of date

6.35 – Adding Affinity Water and Anglian Water WRMPs is also important because they do not operate in isolation and abstraction by one can significantly affect the environment in another water company area.

After 6.36 – list Anglian Water's 'Long term water recycling plan' – a voluntary 25 year plan for water recycling infrastructure taking into account relatively up to date (2018) growth figures.

6.48 – see Groundwater and contaminated land commentary below.

6.50 Over-abstraction is a key issue. Please note that the 'moderate water stress' classification for Cambridge Water's supply area relates to a specific assessment that was principally designed to guide water company decisions around compulsory customer metering. The term should be omitted in the growth context as it is not reflective of the environmental situation in Greater Cambridge's area. We suggest that Water Resources East would be a relevant partnership to describe in the SEA.

A description of the 2019 drought would illustrate the vulnerability of chalk streams and the related water environment to prolonged dry weather.

7.29 – the current WCS is out of date.

Sustainability Issues:

As mentioned earlier, we advise that air quality is separated from land and water.

Some key questions for the plan and SEA to assess:

1. The quantum, location and phasing of growth and its relationship with the water environment, along with related agriculture and water dependent industry. This assessment should be in combination with:

    - how phasing compares with the implementation timescales for any new strategic schemes that water companies may require.

    - climate change adaptation, taking a ‘no regrets’ approach to irreversible decisions, and a managed adaptive approach to monitoring and review.

    - considering the cross-over of water resources and water quality in the above context

2. The SEA should consider the impact of not planning for the impacts of growth. This should be in combination with climate change given that unplanned growth and is the most likely ‘what if no plan?’ scenario, and climate change adaptation is the government planning scenario.

3. The extent to which evolution in the current system of regulation through planning, Building Regulations and water industry regulation may facilitate more sustainable growth that can adapt to climate change.

Evidence base:

To inform the plan and SEA, as a minimum, a Water Cycle study [and strategy] will be needed to evidence and tackle some key questions around water resource availability to serve the growth ambitions and related water company plans, bearing in mind other growth in the catchments and climate change. This is both within the plan period, and for the lifetime of the planned development that would ‘lock in’ water demand over a longer-term period overlapping with the more advanced impacts of a changing climate.

Given the overlap with drainage (SuDS), wastewater and flood risk management, these issues are indivisible and could not be tackled by individual evidence topics in isolation. An Integrated Water Management (IWM) study [and strategy] is the most suitable tool in our opinion (see IWM commentary).

The Environment Agency recommends Greater Cambridge working closely with water companies (Cambridge Water [South Staffs], Affinity Water, Anglian Water) CPCA, Water Resources East and the Environment Agency to consider the overlap extent and transferability of the scope and assumptions in the emerging water company Water Resource Management Plans (WRMPs).

We are mindful that a significant part of water abstraction and conveyance issues are a regional scale issue (broadened by connected aquifers and water transfer). Thus the issues do not follow local authority or even water company boundaries. We advise that there is a duty to cooperate with local authorities sharing related water resources. Whilst ultimately this duty in respect of growth falls to the LPAs as plan makers, the Cambridgeshire and Peterborough Combined Authority (CPCA) has the potential to play a key role both in assessing larger than local scale needs [via the NSSF], evaluating approaches and brokering solutions. This is particularly important given the scale of the challenge in meeting growth demands with locally and sustainably sourced water using the existing regulatory systems. It is possible that significant new infrastructure and regulation tools could be part of the solution.

It is further possible that new approaches will be needed to more sustainably manage existing abstraction, particularly when looking ahead beyond the plan period within the context of climate change projections showing reduced annual precipitation and mean river flow. Carbon-intensive technologies may not present a sustainable solution to alternative supplies (such as desalination or long distance water transfer). Nevertheless these options are reasonably foreseeable long term possibilities and thus may need to be assessed as options as part of SEA.

Water quality and water resources as integrated issues

There is a close relationship between water resource availability and water quality. This is due to the ambient diluting effect of the river base flow being a factor for the vulnerability of the river ecology to pollution, such as from treated effluent permitted to be discharged. In short, the more water resource there is in the river environment, the more flexibility there is to accommodate treated effluent from extra growth and adaptation to climate change.

The Water cycle study [and strategy] will need to look at various growth options to test these interrelationships cumulatively) alongside other LPA plans and water company plans (such as the Anglian Water Long Term Water Recycling Plan/Drainage and Wastewater Management Plan [DWMP]). This will ensure that the objectives set out in the Anglian River Basin Management Plan are not compromised. The WCS will also inform the Habitat Regulations Assessment and any other legislative requirements for protecting SSSI’s, SAC and RAMSAR sites.

To bring the SA Objective SA10 in line with NPPF and the Anglian RBMP, we advise that it should be amended as follows: ‘To achieve sustainable water resource management and ~~promote~~ enhance the quality of Greater Cambridge’s waters’.

SA10.3: ‘Does the plan ensure there is sufficient wastewater treatment infrastructure and environmental capacity to accommodate the new development in a changing climate?’

New Appraisal question SA10.1 (would be more appropriate to add as a first question that n as a new 10.6). ‘SA10.1: Does the plan ensure there is sufficient water to serve new growth for the lifetime of the development in a changing climate without negatively impacting on the environment or other existing water users such as agriculture and employment?’

Water quality

Water quality will be a significant issue for the plan and SEA to address. With proposals for a new and relocated wastewater treatment works (WwTW) for Cambridge, there is potential for a satisfactory long term infrastructure solution. However there is also a possibly of a temporary shortfall in capacity at the existing Milton works whilst the new works is being built. This is particularly significant in view of the Waterbeach New Town which has no approved infrastructure once the existing village works capacity is exhausted. This issue has not yet been assessed with SEA in any current development plan. The WCS, Plans and SEA should address this outstanding risk.

Growth served by WwTWs discharging to smaller watercourses (tributaries or IDB drains) is likely to be more variable in terms of the feasibility of providing infrastructure that does not deteriorate the water body, cause non-achievement of good status or lead to significant adverse flood risk. The Uttons Drove catchment is one such example where further growth is likely to be extremely challenging and where the SEA should consider whether it is desirable or realistic to pursue further significant growth.

Water quality is to some extent a linear issue because the discharge from one WwTW impacts the pollutant load further downstream. This in turn affects the ability of the watercourse to withstand further effluent from growth in areas served by other WwTWs. The WCS should inform the SEA of this issue and how the plan responds to it spatially as part of a catchment based approach.

There is some crossover with phosphates and nitrates arising from growth and development and those from agriculture, and the SEA should consider how the plan might influence agricultural inputs in tandem with wastewater management. This will be a significant issue in the HRA to consider the in-combination effects of

development in other plan areas (duty to cooperate) and other pollutant sources including nitrates from air pollution.

Sustainable drainage systems are critical to manage diffuse pollution from new development, therefore the overlap with surface water management will need to be picked up in the SEA.

Groundwater and contaminated land

Given the scarcity of water in the catchments serving supplies for the Greater Cambridge area, protecting water resources from pollution and contamination is a critical issue. In most cases development can be part of the solution to remediating land and water affected by a legacy of pollution. However in some cases land contamination is particularly acute or difficult to deal with, and proactive planning solutions may be necessary to bring about solutions that do not fall back on the local public purse through Part IIA of the Environmental Protection Act.

One measurement of the plan is whether it achieves this aim through effective development management policies, and through pro-active strategies and partnership approaches – for example tackling development-lead remediation of former landfill sites, tanneries, airfields or agricultural pesticide/herbicide manufacturing sites. This could be picked up through an integrated water management strategy that looks at land contamination and water resource impacts arising to identify sites and aquifers that may need a pro-active or site specific policy approach.

Climate change and flood risk matters:

Technical issue: 6.32, the description of the Anglian River Basin District Flood Risk Management Plan (2016) (FRMP) appears to be for a River Basin Management Plan rather than a FRMP.

Technical Issue: 7.41, the major watercourse in the area is the Great Ouse. There are multiple rivers that have Ouse in their name so it needs to be clear that you are not referring to a river that flows through York.

General comments:

Currently the assessment of flood risk is focussed within the climate change section. Flood risk is primarily an economic risk issue.

Flood risk should not be treated just as a consequence of climate change, there are areas at flood risk now even if climate change has no impact – the risk is projected to increase spatially, in frequency and magnitude. The best place would likely be a subsection of the Land and Water section, with Air having its own chapter, being the least related.

Adaptation measures needed to reduce the impact of increased flood risk, due to climate change, could be separated out in the climate change section, however it is advisable that the plan itself deals with these as matters of integrated water management.

The current climate change sections on flood risk need to represent the climate changes impact on flood risk. For example. Section 7.42 and Figure 7.1 refer to the flood map for planning, which reflects the current flood risk and the future flood risk. In the climate change section it would be relevant to demonstrate the known impacts of climate change on flood risk through the use of modelled outputs, and set out which risks are not currently mapped/modelled (e.g. surface water in some catchments).

Biodiversity

In summary we advise that aquatic and wetland habitats have insufficient coverage and focus in the baseline commentary, particularly given the significance of water's contribution to most of the designated sites, and compliance with the Anglian RBMP. The RBMP embodies the requirements of the EU Water Framework Directive – or successor UK legislation should the UK leave the EU.

As well as designated ecological sites, consideration should be given in proposed developments to avoidance, retention and protection of existing habitats found across the wider landscape, and the natural resources that support biodiversity. The water environment is a conspicuous absence in this wider context too.

The plan should be assessed for how it delivers habitat enhancements that link up with existing habitats and are in keeping with the local landscape character, as highlighted in Figure 8.1 Biodiversity Opportunity Mapping of the SA Scoping Report. This needs to further recognise the impact on biodiversity from climate change with or without new development, and the need to plan for climate change adaptation in any event.

To follow the NPPF (and the Environment Bill, if it achieve Royal Assent) biodiversity net gain (BNG) should be a clearer objective, and options for achieving that set out – both in terms of the levels of BNG but also the target categories to be measured (metrics) and priorities amongst those in view if the Sustainability Appraisal. This may consider cross-cutting themes, so for instance woodland holds carbon, and can also improve water quality and reduce flood risk, in the right locations.

We advise that 8.24 should list the Cam Washes SSSI and describe its significance.

Fragmentation of existing habitats should be covered with a view to avoidance, and strengthening existing links through BNG where possible. This is in accordance with the National Planning Policy Framework, which states that Planning policies and decisions should contribute to and enhance the natural and local environment,

minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

In the scoping report section 8.14 – 8.21, the Anglian River Basin Management Plan is highly relevant to setting and improving the ecological status of watercourses. It also sets out targets, the baseline from which no deterioration is allowed and a series of measures in related catchment strategies. We advise that it is a wealth of information for the Sustainability Appraisal and local plan. The Environment Agency can help Greater Cambridge to interrogate the RBMP and pin-point any relevant projects to link up with in respect of BNG and Green Infrastructure. The impacts of potential over-abstraction or unsustainable impacts on water quality link in here too so should be cross referenced.

In addition to the assessment requirements for designated sites, Water Framework Directive (WFD) assessments are likely to be required for development plans and projects that could impact on WFD waterbodies. Future development projects should not lead to a deterioration in current waterbody status (as a red line) or prevent a waterbody from achieving the required status – subject to tests.

Management of invasive non-native species (INNS) and the importance of biosecurity is a consideration in future plans and developments. The presence of INNS can lead to impacts on native species and habitats. There is also an economic consideration as the costs associated with managing INNS can be very high. Adopting appropriate biosecurity measures can help to reduce the spread of INNS, helping to protect biodiversity.

Historic England

Thank you for you notification of the Greater Cambridge Local Plan Sustainability Appraisal draft scoping report for your Local Plan. As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the preservation and enjoyment of the historic environment.

We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review the following as part of your sustainability appraisal scoping:

The Historic Environment in Local Plan - Good Practice Advice in Planning 1

<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

HE Good Practice Advice in Planning 3 - the setting of heritage assets:(Dec 2017) <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets.pdf/>

The Historic Environment and Site Allocations and Local Plans - Advice Note 3

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> (01 Dec 2016)

All Historic England advice should be read alongside our Conservation Principles, which underpin our work. Conservation Principles can be found here:

<https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>

Our response broadly covers the following questions posed in the scoping report.

1) Whether the scope of the SA is appropriate for considering the role of the

Greater Cambridge Local Plan to help meet and manage the growth needs and

development ambition of Greater Cambridge.

2) Whether there are any additional plans, policies or programmes that are relevant

to the SA policy context that should be included.

3) Whether the baseline information provided is robust and comprehensive, and

provides a suitable baseline for the SA of the Greater Cambridge Local Plan.

4) Whether there are any additional SA issues relevant to the Local Plan that

should be included.

5) Whether the SA Framework is appropriate and includes a suitable set of SA

objectives and site-based assumptions for assessing the effects of the options included within the Greater Cambridge Local Plan and reasonable alternatives.

Terminology

We welcome reference in the report to the historic environment. The historic environment is considered the most appropriate term to use as a topic heading as it

encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.

Policies, Plans and Programmes

Page 104 Most of the chapters start with a sub heading ‘Policy Context’ We note that while there is a section on this in the historic environment chapter there is no sub heading and indeed no mention in the Contents page The same issue occurs in the landscape chapter.

We welcome the list of Policies, Plans and Programmes on pp104-106 of the report. We also suggest you include the following:

National

· Planning (Listed Buildings & Conservation Areas) Act 1990

· Ancient Monuments & Archaeological Areas Act 1979

Local

· Historic Environment Record

· Conservation Area Character Appraisals and Management Plans

· Listed building Heritage Partnership Agreements

Baseline Information

All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled

Monuments, Registered Parks and Gardens) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas. We note these are included on figure 9.1 which is welcomed.

We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the District should be acknowledged and outlined in this section. Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.

Historic England’s Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.

Key Sustainability Issues

We broadly welcome the issues identified in Table 9.1 of the report. However, this does not expressly reference designated and non-designated heritage assets. We would also suggest that other Key Sustainability Issues for the Historic Environment should include:

· Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings

· Heritage assets at risk from neglect, decay, or development pressures;

· Areas where there is likely to be further significant loss or erosion of landscape/ /townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it

· Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

We would expect to see consideration of opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities. Example opportunities for the historic environment to include within the Sustainability Appraisal can be found in our guidance notes in the links above.

In respect of landscape, we very much welcome the commitment at paragraph 10.12

to commission and Green Belt Assessment and Landscape Character Assessment as part of the evidence base for the Local Plan.

SA Objectives and Appraisal Questions

We broadly welcome the SA Objectives 6 and 7 and the associated Appraisal Questions. Further suggestions for objections and questions can be found in our Sustainability Appraisal Advice note 8 (see link above).

Method for Generation of Alternatives

The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base. Particularly in the case of large strategic sites or sites with particular heritage issues, we would expect the preparation of a

proportionate heritage impact assessment at an early stage in the Plan preparation process.

Concluding thoughts

In preparation of the forthcoming Sustainability Appraisal, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Natural England

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

You will be aware that we have not had a great deal of time to carry out a detailed review of the scoping reports prepared by LUC (September 2019). However, we have provided some comments below, focusing on the key themes relevant to our natural environment remit, which I hope you will find useful. Some of these comments follow on from our recent useful discussions with the Greater Cambridge Shared Planning Service on the Greater Cambridge Biodiversity and Green Infrastructure Opportunity Mapping evidence brief. Needless to say, the evidence emerging from this study should be used to inform both the HRA and SA.

HRA Scoping Report

Natural England's advice is that the proposed approach to the assessment, including identification of potential impacts and screening methodology, appears to be in general accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

We welcome consideration of long-distance impact pathways for designated sites located beyond the identified 15km buffer, including hydrological effects and recreational pressure.

We are generally satisfied with the European sites screened in for assessment through each of the potential impact pathways. We note that Wicken Fen Ramsar site and Chippenham Fen Ramsar sites, component sites of Fenland SAC, have both been scoped out of potential air pollution impacts based on their location >200m from a strategic road, as indicated in Fig. 3.1 in Appendix 3 of the report. We note that these sites are only just beyond the recognised 200m threshold for air

quality impacts from roads (as referenced in Highways Agency Design Manual for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 114). Given this our advice is that the HRA should provide sufficient evidence to demonstrate that there is no credible risk of air pollution beyond the 200m threshold that could potentially result in an adverse effect to either of these European sites.

We welcome the proposal to undertake detailed assessment of recreational pressure impacts to relevant sites i.e. the Ouse Washes, Eversden and Wimpole Woods, Portholme, Devils Dyke, and Wicken Fen. We note that it is proposed to apply a generic 7km zone of influence (ZoI) for visitor pressure, based on that applied for Thames Basin Heaths SPA; however, the report recognises that targeted visitor surveys are usually required to establish ZoIs due to the range of complex and interacting factors affecting individual sites. Our advice is that reference should be made to Natural England's Cambridgeshire Recreational Pressure Impact Risk Zones (IRZs), available through https://magic.defra.gov.uk/MagicMap.aspx and the findings of visitor surveys such as that recently commissioned by the National Trust for Wicken Fen. Additional relevant data and information used to inform the Local Plan Biodiversity and Green Infrastructure evidence base, including the findings of any bespoke visitor surveys, will also need to be considered.

It should be noted that Natural England's Site Improvement Plans (SIPs) only flag key high level issues rather than all potential risks to European site features; additionally some of these documents may also be in need of an update. Similarly Natural England's Supplementary Advice Packages (SAPs) may not flag recreational pressure risks where these have been prepared prior to recent updates to our Cambridgeshire Recreational Pressure IRZs. Reference should be made to the IRZs and relevant information relating to the SSSIs which underpin the European sites, available via Natural England's Designated Sites View.

The assessment should include evidence to demonstrate the lack of hydrological connectivity between water resources which could be affected as a result of the GCLP and Chippenham Fen. Our advice is that the HRA should provide sufficient evidence to demonstrate no likely significant effect to those European sites screened out of the detailed assessment.

SA Scoping Report

Natural England is satisfied that the proposed approach to the Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)), including objectives, environmental baseline review and the SA framework is comprehensive and appears to meet the requirements of the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations').

Air, Land and Water theme – we welcome recognition of the importance of the Local Plan in guiding development to protect and enhance air and water quality, geology and soils to benefit the natural environment, including biodiversity, and to enhance people's health and wellbeing. Natural England advises that reference should be made to the emerging Defra England Peat Strategy and the pilot

projects, which includes the East Anglian Fens Peat Pilot, currently being undertaken to inform this. 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. 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. It will also bring in long-term sustainability of peat management opportunities and creation of the Lowland Agricultural Peat Taskforce.

We support recognition of the water resource and quality issues across the Greater Cambridge area and the need for Plan policies to address these to ensure no detrimental effect on the natural environment. This will need to address potential risks to water-dependent statutorily designated sites. We anticipate that this aspect of the assessment will be underpinned by evidence through an updated water cycle study. We look to the Environment Agency, as lead authority on these matters, to provide more detailed comments on water-related issues and how these should be addressed through the SA.

Climate Change Adaptation and Mitigation theme – we welcome inclusion of this theme and advise that our comments above relating to lowland peat and water resources / quality should also be addressed in this section. 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.

Biodiversity theme – we welcome reference to relevant legislation and policy to protect the natural environment including actions required under the Defra 25 Year Environment Plan such as development of Nature Recovery Network and protecting and improving our global environment. We support reference to key local policy, guidance and evidence documents including the Cambridgeshire Green Infrastructure Strategy, the Cambridgeshire habitat opportunity mapping project and Natural Cambridgeshire's Doubling Nature 'Vision'.

We welcome recognition in section 8.22 that both Councils have declared biodiversity emergencies and support for the Natural Cambridgeshire's vision to double the area of rich wildlife habitats and natural greenspace within Cambridgeshire and Peterborough. Acknowledgement of the hierarchy of designated wildlife sites, within and beyond the plan boundary, and the pressures development is placing on these sites and wider biodiversity, including Priority Habitats and Species, is welcomed. Our advice is that protection / enhancement of statutorily designated sites should be central to the assessment, along with reference to and application of the ecological mitigation hierarchy, to ensure that allocations / development avoids adverse impact to these and other important sites / priority habitats, wherever possible.

Reference should be made to Natural England's Cambridgeshire SSSI Recreational Pressure Impact Risk Zones (IRZs) and our recent advice to Cambridgeshire LPAs, as detailed in our response to the Greater Cambridge Biodiversity and Green Infrastructure Opportunity Mapping evidence brief. We welcome consideration of the effects of recreational pressure, associated with development, on designated sites including cross-boundary effects on sites such

as Therfield Heath SSSI (please note ‘Heath’ rather than ‘Marshes’) and the effect this can have on SSSI ‘favourable’ condition status.

In considering the biodiversity baseline we welcome reference to the Cambridgeshire Biodiversity Partnership’s habitat opportunity mapping project and the habitat buffering and connectivity opportunities this has identified, presented on Figure 8.1. Useful additional reference could be made to Natural England’s national nature recovery network mapping project, as indicated in our response to the Greater Cambridge Biodiversity and Green Infrastructure Opportunity Mapping evidence brief.

Natural England supports recognition of the National Trust’s Wicken Fen Vision and priority areas such as the West Cambridgeshire Hundreds. Reference to other relevant Cambridgeshire focus / priority areas, such as Ouse Valleys, Cambridgeshire Fens and Chalk and Chilterns, should also be made as suggested in our response to the Greater Cambridge Biodiversity and Green Infrastructure Opportunity Mapping evidence brief.

We welcome acknowledgement of habitat loss and fragmentation / isolation as a key concern for biodiversity, as indicated in the Cambridgeshire Green Infrastructure Strategy, influenced by climate change and development pressure. Fragments of ancient woodland are recognised as being particularly ecologically isolated. Natural England welcomes that a new biodiversity & green infrastructure study is being commissioned by the Councils for the Local Plan evidence base which will aim to contribute towards addressing such issues through its allocations and policies.

We believe that the key biodiversity sustainability issues are identified in Table 8.1. Natural England particularly welcomes the recognition that the new Local Plan presents the opportunity for new development to come forward in the most appropriate locations to avoid adverse impacts to biodiversity assets and to guide delivery of net gain. As indicated above protection / enhancement of statutorily designated sites should be central to the assessment, along with reference to and application of the ecological mitigation hierarchy, to ensure that allocations / development avoids adverse impact to these and other important sites / priority habitats, wherever possible.

As indicated in our response to the Greater Cambridge Biodiversity and Green Infrastructure Opportunity Mapping evidence brief, we believe additional reference should be made to the following:

- Wicken Fen Visitor Study – National Trust will need to be contacted for details;
- Natural England’s Monitoring Engagement in the Natural Environment (MENE) data, available online, and to whether additional bespoke visitor surveys are required to understand the zone of influence and effects of recreational pressure. OrVal is another useful access / visitor tool;
- Natural England Cambridgeshire ANGSt Analysis 2010 which illustrates accessible GI deficiencies at a district scale.

The Greater Cambridge Biodiversity & Green infrastructure Opportunity Mapping evidence study should inform the HRA and the biodiversity aspects of the SA.

We hope that our comments are helpful. Natural England will be pleased to provide more detailed comments once the draft assessments have been made available. Please note that we will be pleased to provide non-statutory advice to the consultants through Natural England's Discretionary Advice Service (DAS).