

Appendix D: Summaries of Representations and Responses: Sustainability Appraisal and Habitats Regulations Assessment

Sustainability Appraisal.....2
Habitats Regulation Assessment.....21

Sustainability Appraisal

Hyperlink for comments

Open this [hyperlink](#) - then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

Number of Representations for this policy: 48

Abbreviations

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

Executive Summary

Some parties such as Parish Councils and Statutory Bodies welcomed the production of the Sustainability Appraisal (SA) to help to ensure that the Plan is sustainable, however there were comments about areas where it was considered that it was flawed or could be improved. A large number of landowners/developers questioned the assessment 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 a need for 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 were questions whether the SA looked adequately at the in-combination impacts of the relocation of the Cambridge Waste Water Treatment Plant to 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 was also some criticism from developers/ landowners of the process for identifying and appraising the sites in the SA. There were some suggestions for improvements to the Sustainability Objectives and making use of up-to-date evidence in the next iteration of the SA to accompany the Draft Local Plan.

Table of representations: Sustainability Appraisal

Summary of issues raised in comments	Comments highlighting this issue
Evidence in the Gamlingay Neighbourhood Plan Strategic Environmental Assessment supports the principle that South Cambridgeshire District Council must lower the reliance on the private car, as there are significantly higher carbon dioxide emissions here than the rest of East of England and England in general.	56569 (Gamlingay PC)
Land should not be taken out of the Green Belt behind Mingle Lane, Stapleford for 100 new houses, as this is clearly not exceptional circumstances and needs revisiting.	56706 (M Howe)
The Minerals and Waste Planning Authority welcomes the inclusion of minerals as an objective but would encourage the consideration of 'sustainable resource use' or 'waste minimisation' when considering objectives for future local plans.	56921 (Cambridgeshire County Council)
The SA has not sought to make the emerging GCLP more sustainable. In respect of the villages, the assessment against sustainability objectives is not robust because it does not critically review the evidence provided by the Councils. For example, some villages have good access by sustainable modes of	57006 (Hastingwood Developments), 57055 (CEMEX UK Properties Ltd), 57067 (C Meadows), 57089 (Shelford Investments), 57100 (RO Group Ltd), 57109 (J Francis), 57117 (Cambridge District Oddfellows), 57125 (KG Moss Will Trust and Moss Family), 57640 (Dudley Developments),

Summary of issues raised in comments	Comments highlighting this issue
<p>transport, contain a good range of services and facilities and there is an identified need for affordable housing in most villages, which is ignored in the assessment process. There is limited capacity within existing settlement boundaries for villages to accommodate additional development.</p>	<p>57656 (Endurance Estates – Balsham Site), 58179 (Bloor Homes Eastern), 58200 (Enterprise Residential Developments Ltd and Davison Group), 58459 (NW Bio and its UK Subsidiary Aracaris Capital Ltd), 58560 (Bloor Homes Eastern), 58563 (J Manning), 58568 (Hill Residential), 58699 (Hawkswren Ltd)</p>
<p>The SA has not sought to make the emerging GCLP more sustainable. The assessment against sustainability objectives is not robust because it does not critically review the evidence provided by the Councils in relation to the economy objective (SA14) and employment objective (SA15) and highlights how unambitious the development strategy is towards supporting the economy of Greater Cambridge.</p>	<p>58616 (Endurance Estates – Caxton Gibbet Site)</p>
<p>The SA is flawed as it is based on the preconceived judgement that development in villages is unsustainable due to car dependency. The SA acknowledges that affordability is a key issue in Greater Cambridge but this does not form a key measure to rate sustainability. A sensible approach for the strategy would be a blend of options which results in some growth in villages. This would also support the viability of existing services and</p>	<p>57357 (Clarendon Land)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>facilities in the villages. The SA is a lengthy and unwieldy document and the brief conclusion is not adequate to summarise such a complex document.</p>	
<p>The inclusion of North East Cambridge AAP is premature and inappropriate as it is predicated on the relocation of the fully functioning Cambridge Waste Water Treatment Plan. The SA does not assess the significant effects the relocation will have on the site identified by Anglian Water. This site is in the Green Belt in an area of 'very high harm' and it would impact on significant green infrastructure, the River Cam corridor, SSSI sites, registered house and gardens, PRoW network, National Trust Wicken Fen vision and is contrary to many policies in the emerging Local Plan. The assessment of the effects of the NEC policy have been deferred to Anglian Water and the DCO planning process and not included within the Local Plan process or its SA which seems an extraordinary position.</p>	<p>57531 (Save Honey Hill Group), 57621 (J Pratt), 57698 (J Conroy), 59264 (C Martin)</p>
<p>These documents are very sound. The problem is that many of the above policies don't fully meet these document statements.</p>	<p>57550 (Stapleford PC)</p>
<p>The SA does not appear to consider all the relevant factors and appears incomplete or inaccurate. It says that the WWTW</p>	<p>58153 (M Asplin)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>relocation will be added later as ‘in-combination effects’. Policy S/NEC and the relocation is contrary to a wide range of policies including capital carbon and Green Belt. The effects of the WWTW relocation are not considered providing an imbalanced assessment. The relocation should be included fully within the SA or alternatively Policy S/NEC omitted until a balanced assessment can be made.</p>	
<p>The sites selected in the strategy do not create a balanced distribution of need and affordability. In the formation of the First Proposals the impacts of a new settlement option or village expansion have been unfairly discounted. The narrow-focused distribution does not provide sufficient confidence that delivery rates can be sustained over short-medium and long-term. Until all reasonable alternatives are appraised it is not possible to conclude the First Proposals is the most sustainable strategy. More work is required to establish which infrastructure projects can be relied upon.</p>	<p>58730 (Vistry Group and RH Topham and Sons Ltd)</p>
<p>The SA has not sought to make the emerging GCLP more sustainable. The assessment against sustainability objectives is not robust because it does not critically review the evidence</p>	<p>58986 (North Barton Road Landowners Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>provided by the Councils. Detailed comments are provided in relation to Policy S/DS and SA objective on housing (SA1) and that there is an over reliance on existing new settlements and planned new neighbourhoods to meet housing requirements. An alternative approach should have been recommended in the SA to improve sustainability outcomes – such as additional strategic allocations on the edge of Cambridge that deliver affordable housing.</p>	
<p>It is not clear whether any ‘in-combination’ effects of the First Proposals and CWWTP have been adequately assessed. We expect the SA to be updated to reflect a proper assessment of these impacts together.</p>	59004 (Endurance Estates)
<p>There is a lack of transparency as to why the components of the First Proposals development strategy has been taken forward and it seems to be in isolation from the evidence testing and results of the SA. It is difficult to understand why certain spatial options have been discounted when they seem to perform well in the SA. For example, Spatial Option 6: Public Transport Corridors seems to perform equally well as Spatial Option 9:</p>	59049 (Axis Land Partnerships)

Summary of issues raised in comments	Comments highlighting this issue
<p>Preferred Option. The justification for taking forward expansion of Cambourne needs to be more robust.</p> <p>In the scoring exercise there are no SA objectives where Spatial Option 9: Preferred Strategy performs better than the other spatial options.</p>	
<p>Concern with the process for identifying sites to take forward for Sustainability Appraisal and therefore to be considered as part of the First Proposals Development Strategy. The 'source of supply' categories are different in the SA with 'public transport corridors' combined with 'villages' with no clear explanation. Sites considered not suitable, not available or not achievable in the HELAA were excluded from the SA assessment.</p>	59049 (Axis Land Partnerships)
<p>The SA fails to properly assess options in relation to employment land requirements in relation to a number of the SA objectives. Detailed justification is provided for each, with the conclusion that existing employment evidence is not sufficiently robust as it fails to provide a full an objective assessment of distribution and industrial needs. In relation to Policy J/NE (New employment and development proposals) the only alternative option is 'no policy',</p>	59105 (Lolworth Developments Limited)

Summary of issues raised in comments	Comments highlighting this issue
<p>but this is not legitimate and at Draft Plan stage the SA should appropriately assess alternative options in relation to strategic employment requirements and land supply.</p>	
<p>The SA would benefit from additional consideration and clarity and should be improved by:</p> <p>Confirmation why updates to policy and Government strategy do not require alterations to Sustainability Framework</p> <ul style="list-style-type: none"> • Baseline data should reflect latest available datasets • Further clarification on how mitigation measures have been factored into scoring reasonable alternatives • For climate change mitigation consideration of whole life carbon in developments, ecosystem services and reduction in travel alongside the measures on energy efficiency in buildings and low carbon energy sources. <p>A detailed review of the SA is provided.</p>	<p>59135 (L&Q Estates Limited and Hill Residential Limited)</p>
<p>Support for SA. If the LPA sticks to what has been written it would be beneficial to the plan.</p>	<p>59208 (Great Shelford PC)</p>
<p>The SA does not provide a thorough and consistent assessment of the growth options, particularly in relation to Option 5 –</p>	<p>59272 (Scott Properties)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>dispersal – villages. It makes assumptions which are not applicable to all villages resulting in an overly negative score which has unjustly influenced the decision to distribute limited growth to villages. Detailed comments about the SA assessment of Option 5 in relation to the SA objectives. Do not support the approach of allocating less than 3% growth in villages as this is inconsistent with the NPPF and the Council’s objectives to support rural communities to thrive and sustain services.</p>	
<p>Welcome the production of the SA. However, as many of the site allocations are grouped together under particular policies, the different impacts for individual sites are not always drawn out in the assessment tables – this sometimes has the effect of neutralising the scoring.</p>	59690 (Historic England)
<p>Whilst there is an objective for Air Quality within the SA, there is no objective included for Transport and Access.</p>	59704 (Central Bedfordshire Council)
<p>The Council’s approach to the SA and undertaking a detailed assessment of only its Preferred Option is unsound (not justified) and not legally compliant. The SA findings for Policy H/SH are not supported by the assumptions underlying the Preferred Option. There is no discussion on an alternative option to</p>	59788 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
allocate specific sites to deliver specialist housing to meet the identified issues of potential under delivery of housing on strategic sites and urban extensions.	
Supportive that up-to-date evidence on landscape and townscape character was used to identify and consider key landscape issues early in the plan making process and feed into the SA.	59984 (Natural England)
<p>Supportive that:</p> <ul style="list-style-type: none"> • A range of reasonable alternative options have been assessed including alternatives to the preferred policy approaches, Strategic Spatial Options and site options. • The findings of the HRA will be incorporated into the SA and will provide further insight into biodiversity impacts specifically at designated sites, presenting the opportunity to limit adverse impacts at these locations. • recognition that the over-abstraction of water is a serious concern and that action is required now to ensure the availability of water for future uses is without detrimental impact on the environment. 	59992 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
<p>Suggest that the overall conclusion of the SA, that the Local Plan performs well in sustainability terms, is premature in the current absence of strategic water supply infrastructure and sustainable interim measures. Further development of Green Infrastructure Initiatives is also required to ensure adequate GI to meet development needs and alleviate recreational pressures on some of the most sensitive site habitats.</p>	<p>59992 (Natural England)</p>
<p>The SA fails to tackle the key environmental capacity issues arising from existing growth, let alone that now proposed. The definition of sustainable development is too narrow and should also include culture (in line with the UN) and Cambridge's historic environment is a cultural asset of worldwide significance. Historic landscape setting is important and open spaces should be valued not only as green infrastructure but also part of the historic environment. Detailed assessment of policies is provided.</p>	<p>60208 (J Preston)</p>
<p>The SA fails to identify any reasonable alternatives relating to quantum of development. The representation refers to the alternatives given for Policy S/JH (New jobs and homes) and says that the justification for discounting the higher growth scenario in Option B is erroneous because if it was only</p>	<p>60247 (Bidwells)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>necessary to assess the 'most likely future scenario' there would be no assessment of alternatives of any kind. This is contrary to the entire purpose of SA and SEA. The higher growth scenario is entirely possible. To withhold the full assessment of Option B effectively blinds the decision maker to the differences in environmental effect and sustainability between them.</p>	
<p>The Councils should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Councils' decision-making and scoring should be robust, justified, and transparent.</p>	<p>60308 (Gladman Developments)</p>

Table of representations: Sustainability Appraisal site-specific comments

Summary of issues raised in comments	Comments highlighting this issue
<p>Land at Bury End Farm, Meldreth</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing, SA2 Access to Services and Facilities and SA8 Efficient Use of Land from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	<p>57006 (Hastingwood Developments)</p>
<p>Land west of Malton Road, Orwell</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	<p>57055 (CEMEX UK Properties Ltd)</p>
<p>Land to rear of 113 Cottenham Road, Histon</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	<p>57067 (C Meadows)</p>
<p>Land off Cabbage Moor, Great Shelford</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RSC and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver</p>	<p>57089 (Shelford Investments)</p>

Summary of issues raised in comments	Comments highlighting this issue
better and more positive sustainability outcomes compared with the preferred development strategy.	
<p>Land south of Hall Lane, Great Chishill</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	57100 (RO Group Ltd)
<p>Land off Ditton Lane, Fen Ditton</p> <p>Detailed comments provided about policies S/DS and S/SB and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	57109 (J Francis)
<p>Land at Two Mill Field and land north of Oakington Road, Cottenham</p> <p>Detailed comments provided about policies S/SH and S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.. The decision to reclassify Cottenham as a Minor Rural Centre is not supported by any evidence and has not been informed by any assessment against sustainability objectives.</p>	57117 (Cambridge District Oddfellows)
<p>Land off Home End and land at Court Meadows House off Balsham Road (as amended), Fulbourn</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to</p>	57125 (KG Moss Will Trust and Moss Family)

Summary of issues raised in comments	Comments highlighting this issue
demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.	
<p>HELAA Site OS216</p> <p>The site scores well against sustainability objectives compared to alternative site options. There are 3 sustainability objectives where negative effects are identified. Access to services score appears incorrect as Great Shelford and Stapleford have a good range of services. Efficient use of land score depends partly on the quantum of development proposed. Mineral resource issue would need to be assessed but unlikely the site would be suitable for extraction due to proximity of residential areas. Request the comments are taken into account when the SA is updated.</p>	57305 (AJ Johnson)
<p>Land off Limekiln Road, Cambridge</p> <p>Detailed comments about policy S/DS and that additional small allocations in sustainable locations such as on the edge of Cambridge, including land at Cherry Hinton on land within the Green Belt, are important to the strategy because such sites can also deliver affordable housing.</p> <p>Comments on each SA objective in relation to the promoted site.</p>	57640 (Dudley Developments)
<p>Land off Old House Road, Balsham</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	57656 (Endurance Estates – Balsham Site)
Land east of Ridgeway and Old Pinewood Way, Papworth Everard	58179 (Bloor Homes Eastern)

Summary of issues raised in comments	Comments highlighting this issue
Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.	
<p>Meadow Drift, Elsworth</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing, SA2 Access to Services and Facilities and SA8 Efficient Use of Land from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	58200 (Enterprise Residential Developments Ltd and Davison Group)
<p>Mill Lane site, Sawston</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RSC and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	58459 (NW Bio and its UK Subsidiary Aracaris Capital Ltd)
<p>Land west of Linton</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RSC and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	58560 (Bloor Homes Eastern)
Station Road, Willingham	58563 (J Manning)

Summary of issues raised in comments	Comments highlighting this issue
<p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	
<p>Land east of Balsham Road, Fulbourn</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	58568 (Hill Residential)
<p>Land at Caxton Gibbet</p> <p>Detailed comments provided about policies S/DS, S/CB, J/NE and the sustainability objectives SA14 Economy and SA15 Employment from the Sustainability Appraisal to demonstrate that the site should be allocated for Class B2 and B8 employment uses to meet floorspace needs and provide job opportunities close to Cambourne.</p>	58616 (Endurance Estates – Caxton Gibbet Site)
<p>Land off Leaden Hill</p> <p>Detailed comments provided about policies S/DS, S/SB, S/RRA and the sustainability objectives SA1 Housing and SA2 Access to Services and Facilities from the Sustainability Appraisal to demonstrate that the site should be allocated for housing and affordable housing to deliver better and more positive sustainability outcomes compared with the preferred development strategy.</p>	58699 (Hawkswren Ltd)
<p>Land North of Barton Road and land at Grange Farm, Cambridge</p>	58986 (North Barton Road Landowners Group)

Summary of issues raised in comments	Comments highlighting this issue
Detailed comments are provided on the SA assessment of the site against each SA objective, justifying why the scores should be altered to be more positive for this site.	
<p>Land North of Cambourne</p> <p>Detailed assessment provided about how the SA assesses the site, highlighting that it performs better than any of the other sites in the Growth around transport nodes Cambourne Area site options. Also how the areas that showed a negative impact could be mitigated through good design and urban planning. The rejection of the site in Appendix E of the SA is questioned as it does not make any reference to the SA objectives and focuses on the uncertain delivery of the station as part of East-West Rail. Request that the North Cambourne proposal is confirmed in future drafts of the Local Plan.</p>	59440 (Martin Grant Homes)
<p>Branch Lane and Long Lane Comberton</p> <p>This site is in a sustainable location in close proximity to a number of services and facilities and the Council should consider allocating specific sites such as this to support integrated living and extra-care accommodation within existing communities.</p>	59788 (Endurance Estates)
<p>Cambridge Science Park North site (HELAA site 40096 - Land East of Impington)</p> <p>The Sustainability Appraisal prepared to support the emerging JLP includes policy interventions in the scoring of other employment designations that somewhat skews the results.</p> <p>For edge of Cambridge Green Belt sites such as CSPN the HELAA process identified that most sites would result in significant landscape impacts. However, the edge of Cambridge performs well in many aspects of sustainability due to its proximity to the jobs, homes and infrastructure of the city. All individual sites on the edge of Cambridge including those in the green belt were subject to site specific consideration for allocation, and for sustainability appraisal.</p>	60686 (Trinity College)

Summary of issues raised in comments	Comments highlighting this issue
<p>The results for CSPN are similar to the Green Belt sites proposed for release, and with regard to certain criteria actually performs better. It is noted that the sustainability appraisal relating to sites including Cambridge Biomedical Campus, Babraham Research Institute and Wellcome Genome Trust includes policy interventions which then improve the sustainability appraisal score once these are translated into planning policy appraisals. For example, the application of criteria 6 (Landscape and Townscape) at Cambridge Biomedical Campus amended a HELAA assessment which identified the potential the site extension would have resulting in a significant adverse effect on the landscape to a policy intervention moving the rating to a positive via a comprehensive landscaping plan.</p> <p>Comprehensive landscaping is proposed at CSPN which similarly would result in a movement in sustainability appraisal scoring. If this approach (of including policy mitigation in the scoring) was undertaken for CSPN the site would score similarly well through the SA process.</p>	

Habitats Regulation Assessment

Hyperlink for all comments

Open this [hyperlink](#) - then go to the sub-heading 'Tell us what you think'> click the magnifying glass symbol

Number of Representations for this section: 4

Abbreviations

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

Executive Summary

Only four respondents made representations to the Habitats Regulation Assessment. Cambridge Past, Present and Future submitted a critical representation which expressed concerns about potential recreational impacts, the consequences of increased water supply and quality issues arising from the Plan. CPPF argued that a conclusion of no adverse effect on the integrity of European sites cannot be reached without further work on the issue of water quantity and quality. Natural England wrote that they would submit a fuller response once the complete HRA is submitted, but noted that the wording for policy BG/BG needs to be strengthened. Endurance Estates wrote in their representation that they expect the policies of the First Proposals to be revised to ensure that the emerging plan secures appropriate mitigation in connection with the development strategy - in particular North-East Cambridge.

Table of representations: Habitats Regulation Assessment

Summary of issues raised in comments	Comments highlighting this issue
<p>Support the recognition at Para 1.10 that the HRA report is based on the precautionary principle and the statement that ‘where uncertainty or doubt remains, an adverse effect should be assumed’.</p> <p>Cambridge Past, Present & Future has also commented on the Biodiversity and green spaces policies in the GCLP First Proposals consultation and our comments on the HRA report should be read in together with these.</p> <p>CambridgePPF are concerned about the potential recreational impacts and the consequences of increased water supply and quality issues arising from the Plan. We also note the caveat that the HRA report indicates that (on a precautionary basis) a conclusion of no adverse effect on the integrity of European sites cannot be reached without further work on issue of water quantity and quality - both key concerns.</p>	5816 (Cambridge Past, Present & Future)
<p>Chapter 3 of the HRA report refers to the assessment of potential in combination effects and the identification of other Local Authority plans that could contribute to these. The scope of this is welcomed. It should be noted though that broader projects such as the Oxford-Cambridge Arc still require more work and detail to enable potential in combination effects to be identified. This also applies to any other site allocations and development that have yet to be defined or that may emerge in future versions of the GCLP.</p>	5816 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
<p>It is noted that para 4.3 indicates a list of policies that will not result in development and will contribute to ensuring the safeguarding of European sites. This intention is welcomed but much will depend on how these policies are worded and framed.</p> <p>We have commented on the need to prioritise policies to ensure that the protection of all sites of biodiversity importance is the first principle - this should also provide clear guidance for future developments on the standards and process that will be required. This includes the assessment of projects, the application of the mitigation hierarchy and justification and compensation for harm to sites where an unavoidable adverse effect might happen.</p>	5816 (Cambridge Past, Present & Future)
<p>Recreational pressure arising from future development because of development planned for in the GCLP could have a serious impact on existing European sites and those of national and local importance that are, of course, not covered by the HRA Report. It is also evident that the potential effect on Wicken Fen and the related Fenland SAC has only been identified because of specific survey work. With this in mind, we are concerned with the confidence that can be placed on a finding of no LSE for other European sites based on a zone of potential risk for recreational pressure based on a 2Km and 5km distance.</p>	5816 (Cambridge Past, Present & Future)
<p>Para 5.5 summarises the LSEs indicated in Table 4.8. That table indicates no LSE from Air Pollution on any European sites. Para 5.5. however indicates to the contrary - we assume this is an error as the subsequent AA does not address this issue.</p>	5816 (Cambridge Past, Present & Future)

Summary of issues raised in comments	Comments highlighting this issue
<p>In relation to 5.35 of the HRA, more clarity will be needed on how this will work in practice. Again, it is appreciated that the policy wording has still to be written. However, this is such an important issue that a clear statement of intent should be made in the GCLP now. If developments are proven to have an adverse effect or, applying the precautionary principle, a risk of an adverse effect, then they should only be normally permitted when clear tests are applied. Arguably this should also include being satisfied that applicants have demonstrated that there are no less damaging alternatives they could pursue.</p>	<p>5816 (Cambridge Past, Present & Future)</p>
<p>Clarification will also be needed of what tests will be used to determine whether public benefits outweigh adverse impacts on important sites, because an approach solely on a case-by-case basis could risk a lack of consistency and consequent serious harm to biodiversity interests without sufficient justification. The level of public interest that would need to be demonstrated will also need to be commensurate with the level of interest affected - this is likely be very high if for example, an internationally or nationally important interest is at risk.</p>	<p>5816 (Cambridge Past, Present & Future)</p>
<p>In relation to 5.46 of the HRA, this overall commitment is welcomed and we are pleased to see that it concludes the need to manage alternative natural greenspace in perpetuity. However, the success of any mitigation (and ultimately any finding of no risk of any adverse effects) will all depend on alternative green space being delivered in a timely fashion to serve new development in the Cambridge Area. At this point in time that assumption is questionable. Specifically, proposed new development at Waterbeach, North East Cambridge and Cambridge East will result in a substantial population within approximately 10 miles of these highly sensitive sites. Existing recreational green spaces such as Milton Country Park are already at capacity. Our recent understanding is that the relevant local authorities do not propose to create any new large scale greenspace for North East Cambridge. Whilst the need for such space is</p>	<p>5816 (Cambridge Past, Present & Future)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>accepted, as yet the local authorities have no mechanism to deliver it. Failure to secure and deliver the required open space would thus place the Wicken Fen Ramsar site and Fenland SAC at considerable risk from increased recreational pressure and could not support a HRA finding of no adverse effect.</p>	
<p>We are concerned that potential harmful effects on European sites have yet to be resolved. This also has implications for effects other sites of national and local biodiversity and must be addressed as a matter of urgency if the GCLP is to proceed. Whilst water availability is, of course, a relevant constraint that the planning system should consider, the capacity of our watercourses to dispose of treated water waste is likely to be a more binding one.</p> <p>Furthermore, consideration must also be given to the climate-change-induced, greater frequency of storm events. Without increased investment by the water authorities the frequency of storm events leading to raw sewerage being discharged is likely to increase, even at current levels of development. At this stage, it is unclear whether there is sufficient capacity available within existing infrastructure and as part of upgrades to WRC to support the increase in wastewater treatment as part of proposed development in the GCLP. It is recommended that exact mitigation measures are informed by the findings of the Greater Cambridge IWMS, including Outline Water Cycle Study and upcoming Detailed Water Cycle Study is recommended that there is a specific inclusion of wording that outlines that any development will only be permitted where there is sufficient capacity within the WRC infrastructure.</p>	<p>5816 (Cambridge Past, Present & Future)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Subject to the findings of the Greater Cambridge IWMS being confirmed and delivered a conclusion of no adverse effect on integrity can be reached. However, in the absence of this study and in line with a precautionary approach, a conclusion of no adverse effect on integrity cannot be reached in relation to the effect of water quality on Ouse Washes SAC, SPA and Ramsar site, Wicken Fen Ramsar site, Chippenham Fen Ramsar site, Fenland SAC and Portholme SAC either alone or in-combination until further detail is provided and presented in the GCLP.</p> <p>Again, as with the water quantity issue, we are concerned that potential harmful effects on European and other important biodiversity sites have yet to be resolved and that this must be addressed as a matter of urgency if the GCLP is to proceed.</p>	5816 (Cambridge Past, Present & Future)
<p>We note and appreciate the point made regarding next steps at para 6.6 that the HRA is an iterative process and is expected to be updated. We will of course comment on further information when this is available. We remain concerned however, that fundamental issues such as the impacts of recreation and water as described above are still to be resolved.</p>	5816 (Cambridge Past, Present & Future)
<p>It appears from the HRA Report that the relocation of the CWWTP is part of the mitigation measures which will be necessary to provide certainty that water quality impacts arising from the First Proposals will not adversely affect the integrity of several designated nature sites, in combination with other plans and projects. We expect the policies of the First Proposals to be revised (including to provide for the relocation of the CWWTP) in order to ensure that the emerging plan secures appropriate mitigation in connection with the development strategy - in particular North East Cambridge.</p>	59010 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
<p>This will require the emerging plan to include proposals for the CWWTP's relocation and if that update is made to the plan we expect the Sustainability Appraisal to be updated to reflect the effects of the CWWTP as part of the assessment of the impacts arising from Policy S/NEC and for this to be re-assessed alongside the alternatives to this policy option.</p>	
<p>Natural England is generally supportive of the interim findings of the HRA and will provide further advice as the HRA is updated in line with the development of Plan policies and further evidence.</p> <p>It is recommended that policy wording in the plan is strengthened to include specific inclusion of the safeguard measures detailed in the representation (completion of bat surveys and ensuring proposed development will avoid habitat features and to create and enhance suitable habitats for species) and that Policy BG/BG Biodiversity and geodiversity is strengthened to include specific reference that mitigation provided should be suitable to the level of protection afforded to designated sites.</p>	59991 (Natural England)
<p>Whilst the assessment has ruled out likely significant effects on all relevant European sites Natural England has been unable to carry out a detailed review of this information and will provide comments at the next stage of Plan consultation.</p>	59991 (Natural England)
<p>Please note that Natural England is reviewing the Impact Risk Zone (IRZ) for Eversden and Wimpole Woods SAC to consider the findings of emerging SAC barbastelle tracking surveys being undertaken for major development schemes. It will also take into consideration the availability of suitable foraging resource which is scarce in the local area. In the meantime, until the IRZ is formally amended, and</p>	59991 (Natural England)

Summary of issues raised in comments	Comments highlighting this issue
<p>accompanying guidance prepared, we welcome application of a precautionary 20km buffer zone for SAC barbastelles in line with Natural England's current local guidance.</p>	

Table of representations: Habitats Regulation Assessment site-specific comments

Summary of issues raised in comments	Comments highlighting this issue
<p>New housing beyond Ninewells must not find a rat run through Ninewells to our homes on Greenland's adding to the already extensive drug running and antisocial groups coming into a cul-de-sac of only 32 homes. Ninewells needs to be redirected to CBC and Park and Ride/cycle route needs to go around NW not through Greenlands. Ninewells needs its own cycle route out to main road and to school/work/leisure routes. Footfall of thousands on Greenlands needs to be reduced not increased.</p> <p>The representation is not fully copied here as it lists all the problems to do with the CBC and is not relevant for this topic.</p>	<p>58084 (I Blackburn-Horgan)</p>