

Appendix 2

Summary of responses by statutory consultees and how they have been addressed in the Scoping Report

Consultee	Comment	Response
Historic England	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.	Noted
	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.	Sub headings now included in all chapters.
	We welcome the list of Policies, Plans and Programmes on pp104-106 of the report. We also suggest you include the following: National <ul style="list-style-type: none"> • Planning (Listed Buildings & Conservation Areas) Act 1990 • Ancient Monuments & Archaeological Areas Act 1979 Local <ul style="list-style-type: none"> • Historic Environment Record • Conservation Area Character Appraisals and Management Plans • Listed building Heritage Partnership Agreements 	Both national-level Acts have now been included in the list of Policies, Plans and Programmes as requested, as have the Conservation Area Character Appraisals (management plans unavailable). The Historic Environment Record and Listed Building Heritage Partnership Agreements have not been included in the list referred to, but have been referenced in the text within the Historic Environment chapter (paragraphs 9.20 and 9.23).

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	<p>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.</p>	<p>Noted.</p>
	<p>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.</p>	<p>Non-designated assets and currently unknown heritage assets have now been referenced within the Historic Environment chapter (paragraph 9.20).</p>
	<p>Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.</p>	<p>Figure 9.2 has now been inserted with a map showing the distribution of identified Heritage at Risk data.</p>
	<p>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:</p> <ul style="list-style-type: none"> • 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 	<p>Table 9.1 has now been updated to address these comments.</p>

Consultee	Comment	Response
	<p>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</p> <ul style="list-style-type: none"> • Traffic congestion, air quality, noise pollution and other problems affecting the historic environment 	
	<p>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.</p>	<p>Reference has been made to this role of the historic environment in paragraph 9.17.</p>
	<p>In respect of landscape, we very much welcome the commitment at paragraph 10.12 to commission a Green Belt Assessment and Landscape Character Assessment as part of the evidence base for the Local Plan.</p>	<p>Noted.</p>
	<p>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).</p>	<p>Noted. Objectives and questions have been reviewed in line with the Advice Note referenced and found that no additional questions were required.</p>
	<p>The historic environment should be a factor when considering a method for the generation of alternative proposals.</p>	<p>This consideration will be taken into account in the next stages of the plan-making process.</p>

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Natural England	<p>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.</p>	<p>Reference to the emerging Defra England Peat Strategy and pilot projects have now been made in paragraph 6.35.</p>
	<p>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.</p>	<p>Reference to the potential risks to water dependent statutorily designated sites has now been included in paragraph 6.41.</p>
	<p>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</p>	<p>Reference to the role of the plan area's peat resources in climate change mitigation have now been included in paragraph 7.37.</p>

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	<p>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.</p>	
	<p>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’.</p>	<p>Noted.</p>
	<p>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.</p>	<p>Noted.</p>
	<p>Reference should be made to Natural England's Cambridgeshire SSSI Recreational Pressure Impact Risk Zones (IRZs) and our</p>	<p>Reference to 'Therfield Marshes' in paragraph 8.36 corrected.</p>

Consultee	Comment	Response
	<p>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.</p>	<p>Cambridgeshire SSSI Recreational Pressure Impact Risk Zones (IRZs) now referred to in paragraph 8.37.</p>
	<p>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.</p>	<p>Natural England's national nature recovery network mapping project is now referenced in paragraph 8.25.</p>
	<p>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.</p>	<p>The Ouse Fen RSPB site (in the Ouse Valley) is already referenced in paragraph 8.27. Further reference has been made to the context of the Cambridgeshire Fens in paragraph 8.34.</p>
	<p>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</p>	<p>Noted.</p>

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	<p>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.</p>	
	<p>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.</p>	<p>Noted.</p>
	<p>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:</p> <ul style="list-style-type: none"> • 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; 	<p>Visitor studies and the MENE data have now been referenced in relation to recreational pressures on vulnerable habitats, in paragraph 8.37.</p> <p>The Natural England Cambridgeshire ANGSt Analysis is not available on-line and is now nearly 10 years old. If up-to-date data becomes available, this will be used to inform the SA where appropriate</p>

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	<ul style="list-style-type: none"> Natural England Cambridgeshire ANGSt Analysis 2010 which illustrates accessible GI deficiencies at a district scale. 	
Environment Agency	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.	Noted.
	In 2.5 the NE fringe AAP is potentially significant.	Reference to the North East Fringe AAP has now been added to the bullet points under paragraph 2.5.
	In 2.6 Waterbeach is nearer 11,000 homes taking into account planning applications, one of which is approved in outline.	The figure of 8 - 9,000 homes was sourced from the Waterbeach New Town SPD (February 2019). However, a reference has now been added to the second bullet under paragraph 2.6 to note that the total development quantum of the settlement may exceed this figure.
	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.	Noted. Further references to natural capital have now been included in the report (see paragraph 6.31). However, a separate sub-topic on Integrated Water Management has not been included. Instead the report has been amended to recognise the links between water quality and quantity (see below).

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	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.	Noted. These issues have now been more comprehensively cross-referenced in the Biodiversity chapter.
	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.	Noted.
	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.	Noted. The relationship between water quality and quantity has now been acknowledged in paragraph 6.39.
	In 6.6 the RBMP needs to make reference to enhancement and the objective for all water bodies to achieve good status by 2027.	This appears to refer to the paragraph on the EU Water Framework Directive, which has now been amended to refer to the 2027 targets.
	On Climate Change, the EA response provides a suggestion for the most appropriate NPPF Paragraphs to list in 6.9.	Several of these NPPF paragraphs are referred to within Chapter 7, however additional references to climate change impacts, as cited in the NPPF, have been added to paragraph 6.8.

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	In 6.10 the relevant sections of the PPG to water services infrastructure should be listed/summarised.	Paragraph 6.9 has been amended to refer to advice regarding the consideration of water services infrastructure during the plan making process.
	After 6.33, Catchment Abstraction Management Plans need to be listed and the pertinent issues summarising.	The relevant plans have been listed and pertinent issues summarised.
	6.34 is out of date	Noted. This is the most up to date version available and any update will be referred to if and when it is available, as now noted in paragraph 6.25.
	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.	These WRMPs have now been included in paragraph 6.27.
	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.	This plan has now been included as paragraph 6.29.
	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	Reference to ‘moderate water stress’ (taken from the 2013 Environment Agency document) has been removed, and over-abstraction has been highlighted, both in paragraph 6.38 and in Table 6.2.

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	context as it is not reflective of the environmental situation in Greater Cambridge's area.	
	We advise that air quality is separated from land and water	Noted. The Air Quality content has now been removed from the 'Land and Water' chapter and included instead within the chapter on Transport Connections and Travel Habits (renamed as 'Transport and Air Quality').
	<p>Suggested 'sustainability issues' for inclusion:</p> <ul style="list-style-type: none"> • Consideration of the phasing of new development and how it aligns with the implementation timescales of new strategic water schemes. • Climate change adaptation and taking a 'no regrets' approach to reversible decisions, and a managed adaptive approach to monitoring and review. • Consideration of the cross-over of water resources/water quality. • Consideration of the impact of not planning for growth. • The extent to which evolution in the current system of regulation may facilitate more sustainable growth that can adapt to climate change. 	Suggestions have been integrated into Table 6.2 where considered appropriate, including a note on climate change adaptation, and the importance of phasing of new development.
	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	Preparing such a study is outside of the scope of the SA Scoping Report, but the findings of any such evidence will be taken into account in the SA if and when available.

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	<p>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, wastewater and flood risk management, it is recommended that an Integrated Water Management Study and strategy should be prepared.</p>	<p>The Councils will shortly be commissioning an Integrated Water Management study to form part of an updated evidence base.</p>
	<p>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.</p>	<p>Noted. A reference has been included to this inter-relation of water resource availability and water quality in paragraph 6.39.</p>
	<p>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.</p>	<p>While the 'duty to cooperate' is outside of the scope of the Scoping Report, it forms the context for action and as such has now been referenced in paragraph 6.38.</p>

Consultee	Comment	Response
	To bring the SA Objective SA10 in line with NPPF and the Anglian RBMP, the Environment Agency advised that the word 'promote' should be replaced with 'enhance'.	SA Objective 10 has now been re-worded as suggested.
	Suggested rewording of question SA10.3: 'Does the plan ensure there is sufficient wastewater treatment infrastructure and environmental capacity to accommodate the new development in a changing climate?'	This question has been reworded as suggested (it is now question 10.4).
	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?'	Extra appraisal question now added to the SA Framework as suggested, with the exception of 'such as agriculture and employment' as many existing users are likely to be residential consumers (and remaining questions re-numbered).
	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	This SA is an assessment of the policies in the emerging Local Plan and will therefore focus on the policies within the latter. However, a reference to the wastewater treatment infrastructure has been included in various points in the report including Table 6.2.

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	<p>discharging to smaller watercourses 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...</p> <p>... There is some crossover with phosphates and nitrates 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.</p>	
	<p>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.</p>	<p>Noted. SUDS are referenced in the appraisal questions for SA Objective 11, as part of the SA Framework.</p>
	<p>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.</p>	<p>Paragraph added to address the issue of water contamination (paragraph 6.40).</p>

Consultee	Comment	Response
	<p>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.</p>	<p>Noted and description amended.</p>
	<p>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.</p>	<p>Noted. References to river Great Ouse have been checked and amended throughout report.</p>
	<p>Currently the assessment of flood risk is focussed within the climate change section. Flood risk is primarily an economic risk issue.</p> <p>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.</p> <p>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.</p>	<p>The flood risk content has not been relocated. It is acknowledged that flood risk exists irrespective of climate change, but it is considered that it is still relevant and appropriate to be retained within the climate change section, as changes to flood risk is likely to be one of the key adaptation issues regarding climate change in the future. Paragraph 7.42 has been amended to reflect the comment. NB the Air Quality section has now been moved to be grouped with Transport.</p>
	<p>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</p>	<p>In order to inform preparation of the Local Plan, an Integrated Water Management Study is to be commissioned, which will incorporate a Water Cycle Study and a Strategic Flood Risk Assessment. This will</p>

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	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).	be used to inform the SA later in the plan preparation process.
	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.	Noted. Sentence added to paragraph 8.24 to highlight the role of aquatic and wetland habitats, and an extra reference to the importance of water bodies to ecological networks has been included in Table 8.1.
	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.	Reference to the water environment now included in paragraphs 8.24 and 8.34.
	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.	Paragraphs 8.35 and 8.38 note that 'habitat loss and fragmentation' is a key concern in the broader region, which is influenced by threats from climate change and development'. However, an additional sentence has also been added to paragraph 8.25.
	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	Sentence added to paragraph 8.38 and wider environmental net gain also referenced within the SA Framework. However it is not appropriate for the SA to determine the specific metrics to be measured. Note that the Councils are in the process of commissioning a Greater

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	holds carbon, and can also improve water quality and reduce flood risk, in the right locations.	Cambridge Biodiversity/Green Infrastructure study, which will set out the strategy on Biodiversity Net Gain.
	We advise that 8.24 should list the Cam Washes SSSI and describe its significance.	Noted. Note added to paragraph 8.26.
	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.	Noted. It is not appropriate for the SA to determine the specific metrics to be measured, however habitat connectivity and Biodiversity Net Gain is referred to under appraisal question SA 5.3.
	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 impacts of potential over-abstraction or unsustainable impacts on water quality link in here too so should be cross referenced.	Anglian River Basin Management Plan has now been listed at paragraph 8.16, and threats to the water environment cross-referenced as part of paragraph 8.37.
	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	Noted. Water Framework Directive (WFD) assessments lie beyond the scope of this

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	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.	SA. It is an issue for the Councils to consider.
	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.	Noted. However the issue of biosecurity is outside the scope of this SA (and more widely of the planning system – the NPPF does not reference this issue).