

Appendix 1

Natural England: Consultation Response

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Dear Jonathan and Nancy

Greater Cambridge Local Plan Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) scoping reports

Thank you for seeking Natural England's comments on the above reports in your emails of 20 and 23 September 2019.

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).

For any queries relating to the specific advice in this letter only please contact Janet Nuttall on 020 802 65894. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Janet Nuttall
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