

Greater Cambridge Shared Planning (GCSP)  
Draft Greater Cambridge Local Plan Consultation

## Cambridge Approaches

Comments related to: **Biodiversity and Geodiversity, Habitats Regulations Assessment**

### Summary

The Local Plan fails to comply with the Habitats Regulations 2017 and UK law in that the HRA for Eversden and Wimpole Woods SAC does not list or consider all the relevant development proposals which, in combination and cumulatively with those in the GCLP, pose threats which may adversely affect the integrity of the SAC and its CSZ. Major infrastructure transport plans and projects are serious omissions, including EWR which alone could extinguish the SAC's Barbastelle bats. That EWRCO. has not yet published its HRA does not absolve GCSP of its responsibility to include EWR in its own HRA process. We consider that the HRA undertaken by LUC for the GCLP is lacking in the evidence necessary to inform a robust Appropriate Assessment.

### Policy BG/BG Biodiversity and geodiversity

1. **Supporting information** states that Eversden and Wimpole Woods SAC, designated for its maternity roost of Barbastelle bats, is '*At present the only site of international importance within Greater Cambridge*', protecting '*one of the rarest bats in Western Europe*'. Importantly the same level of legal protection accorded to the SAC also applies to the surrounding Core Sustenance Zone (CSZ) of 'Functionally Linked Land', vital for the bats' foraging, commuting and temporary roosting activity.
2. We have a major concern that the Local Plan is not compliant with the Habitats Regulations 2017 in failing to adequately consider the necessary full scope of plans and projects required under the Habitats Regulations Assessment (HRA) process for the SAC. As such, the Local Plan does not fulfil its obligation to consider all the relevant, potential in-combination and cumulative impacts of plans and projects on the SAC.
3. The legally-binding basis for this obligation derives from EU guidance: [http://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm), which is also current UK Government guidance for NSIPs (<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments>). The guidance is clear that consideration should be given to plans and/or projects which are completed, approved but uncompleted, or proposed.

4. Regulations 63 and 105 of the Habitats Directive both state in similar terms that where a plan or project (a) *'is likely to have a significant effect on a European site... (either alone or in combination with other plans or projects)'* or (b) *'is not directly connected with or necessary to the management of the site'*, a competent (or 'plan-making') authority must make an appropriate assessment of the implications of the plan or project for the site's conservation objectives before deciding to put the plan into effect.
5. In ***Protection of biodiversity and geodiversity***, point (7) states that *'Development proposals which have a direct or indirect adverse effect on sites of biodiversity or geological importance (as identified on the Policies Map) will not be permitted.'* This suggests that the Local Plan is only considering those proposals for which the Councils are the competent authority.
6. If so, the Local Plan fails to make any explicit mention of the major transport infrastructure projects of East West Rail (EWR), Cambourne to Cambridge (C2C) Scheme, and the A428 Black Cat to Caxton Gibbet Road Improvement Scheme, and their in-combination and cumulative effects on the SAC.
7. Neither is there any recognition in the Local Plan of the close linkage of these with the housing plan, especially the proposed 13,5000 houses north of Cambourne which are assumed to be reliant on C2C and EWR. The fact that EWR Co. has not yet published its own HRA does not absolve GCSP of its responsibility to consider these interactions which have a profound bearing on the sustainability of the SAC and its vulnerable colony of Barbastelle bats.
8. This is crucial not least because our critical examination of the likely significant effects of the EWR scheme on the SAC has raised serious concerns (see, e.g. <https://markavery.info/2025/04/02/guest-blog-hs2s-badly-behaved-little-brother-by-euan-dunn/>). EWR's proposed 'Southern Approach to Cambridge' slices through the bats' CSZ and, despite EWR Co's confidence that the threat to severing the Barbastelles' flight paths (and reducing death by collision) will be mitigated by installing 'green bridges' and underpasses on the rail route, there is no scientific evidence that the bats will use them, and significant evidence that they mostly won't. Our examination of EWR Co.'s own HRA overview (2023) found it overly optimistic and flawed, not least in underestimating the likelihood of the bats starving during the highly environmentally damaging construction phase lasting up to an estimated 7 years. For other likely adverse impacts of EWR, see below for detailed points arising from LUC's HRA of the GCLP.
9. In January 2025, Cambridgeshire County Council concurred that EWR posed an existential threat to the SAC and assessed the potential impact on the maternity roost of EWR's proposals for its southern approach to Cambridge to be *'unacceptable'* and *'catastrophic'*, including *'in the worst-case scenario, loss of the maternity roost.'* (<https://www.bbc.co.uk/news/articles/c8d9m583qml0>).
10. The Local Plan needs to reflect the gravity of this CCC conclusion and be explicit that EWR and the other transport projects will be taken into account in the Councils' HRA process in which appropriate assessment requires inclusion of all plans and projects that could have significant in-combination and cumulative effects on the SAC.

11. The nearest the background to the Local Plan gets to conceding this need is to be found in LUC's (2025) *Habitats Regulations Assessment of Greater Cambridge Local Plan* <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-10/SDGCLPDGCLPHRAOct25.pdf>, in which para 3.24 states that '*Where relevant, any strategic projects in the area that would have in-combination effects with the GCLP will also be identified and reviewed*'.
12. However, it is by no means clear what is meant by 'reviewed' and we have found nothing to show which strategic projects have been considered in combination with the Local Plan. This hiatus does not inspire confidence that the cumulative impact of the strategic and local development proposals will be comprehensively determined with a view to influencing GCLP planning decisions and delivery. It is a major oversight and omission that the Local Plan does not build on the GCLP HRA report by elaborating on this necessary wider screening scope and its practical implications.
13. The local plans of other authorities have been explicit on this where the GCLP has not. For example, in relation to potential adverse effects on the integrity of the Oxford Meadows SAC, the Oxford Local Plan 2040 included EWR in its assessment of in-combination effects (see pp 45-47 in <https://mycouncil.oxford.gov.uk/documents/s75803/Appendix%203%20Habitat%20Regulations%20Assessment%20for%20Local%20Plan%202040%20Sept%202023.pdf>).
14. We also note that, unlike the Local Plan, the EIA of the C2C Scheme *has* been explicit in taking into account the A428 upgrade (para 9.1.9) in assessing 'cumulative effects' of the scheme (<https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/C2C-TWAO/Draft-documents/8-ES/5.-Technical-Report-Ecology.pdf>).
15. Likewise, in the *Habitats Regulations Screening – Local Transport and Connectivity Plan (2022)* <https://cambridgeshirepeterborough-ca.gov.uk/wp-content/uploads/documents/transport/local-transport-plan/Reports-and-Appendices/Evidence-CPCA-LTCP-Habitats-Regulations-Assessment.pdf>, in-combination effects (para 3.4) include '*Major projects - These include proposed transport projects from the Regional Transport Strategy, projects under construction from the Highways England and Network Rail websites, and planning applications for major developments.*'
16. Given that Barbastelle bats are known to forage up to 20km from their roost, proposed major infrastructure developments just *beyond* the Cambs boundary, e.g. at Tempsford (New Town, High Level Station, Logistics Hub), should also be considered for potential in-combination effects. This is consistent with the aforesaid *Habitats Regulations Screening – Local Transport and Connectivity Plan* in which para 3.2 states that '*an area within 30km of the LTP territory for SACs or cSACS that are designated for bats*' should be zoned for screening, '*taking account of mobile species that live in a*

*metapopulation that may occur outside of the LTCP territory but may still interact with the territory.'*

17. In summary, with regard to the HRA of Eversden and Wimpole Woods SAC, the Greater Cambridge Local Plan must therefore be amended to:

- (i) include and list all major infrastructure projects in the screening of development proposals likely to contribute to in-combination and cumulative effects on the SAC and its CSZ.
- (ii) set out in detail how the HRA for the SAC will take into account the effect of these respective major infrastructure projects in combination with the development proposals for which the Councils are the competent authority.

18. The Local Plan must give particular priority to applying the aforementioned (i)-(ii) in regard to effects on the Barbastelle bats' CSZ of 10 km radius from the SAC, as specified in para 5.11 of Appendix D of the *Habitats Regulations Assessment of the Greater Cambridge Local Plan*

(<https://consultations.greatercambridgeplanning.org/sites/gcp/files/2025-10/SDGCLPDGCLPHRAOct25.pdf>) and para 5.6.17 in the *Greater Cambridge Shared Planning: Biodiversity Supplementary Planning Document*

(<https://www.greatercambridgeplanning.org/media/2504/gcsp-biodiversity-spd-final-copy-march-2022-1.pdf>), namely 'All development within 5 km of the [Eversden and Wimpole Woods] Special Area of Conservation designated site is considered by Natural England as a key conservation area with a 10 km sustenance or wider conservation area.

*area.*

19. The Local Plan lists the following development proposals which fall within the SAC's 10km CSZ of Functionally Linked Land:

- **Policy S/RRA/H:** Land at Highfields (phase 2), Caldecote (65 homes on 3.74 ha)
- **Policy S/BA:** Bourn Airfield New Village (in which the Local Plan notes the importance of coordinating phases of construction with EWR's proposed tunnel to 'minimise disruption as much as possible').

20. However, the Local Plan needs to take into account not just these but *all* relevant sites. In the *Habitats Regulations Assessment of Greater Cambridge Local Plan* Appendix D presents a longer list of sites, albeit several developments – including surprisingly Cambourne West – are omitted.

21. For a much more comprehensive - if not exhaustive - list made by Cambridge Approaches of proposed developments within a 10km approx. radius of the SAC (plus other major schemes and projects), see **Appendix 1** (below) to our Local Plan response.

22. In terms of how in-combination effects relate to habitat loss, we note that the total land take for the GC development proposals within a 10km radius of the SAC is ca.1000ha,

representing a potentially significant environmental impact from habitat loss, to which needs to be added an unknown extent of land take by other major infrastructure projects (although ARUP's Environmental Assessment on behalf of EWR Co estimates a 66.8ha loss of functionally linked land within 5km of the SAC).

23. With regard to the need for the Councils' HRA to take into account the contribution of major infrastructure projects to in-combination effects, we have the following additional comments on the *Habitats Regulations Assessment of Greater Cambridge Local Plan* (HRA report paragraphs in italics, followed by our bulleted comments):

**1.19:** *'Article 6(3) of the Habitats Directive must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.'*

- Consideration needs to be given to the impacts on the CSZ arising from the total construction footprint of EWR (and other major infrastructure projects), including importantly construction compounds and haul routes. These pose multiple threats (habitat fragmentation and loss, noise, light pollution, flight path severance, collision risk) to the SAC's Barbastelle bats. Nor does expert advice suggest that these threats can be mitigated by BNG in terms of sustaining the bat population through the construction phase of EWR.
- To emphasise the importance of these potential threats and EWR's attempt to underplay them, the EWR Environmental Update Report 2024 <https://eastwestrail.co.uk/consultation2024/environmental-update-report> refers to 'Temporary construction impacts' between Comberton and the Shelfords whereby (para 11.2.16) 'extensive construction' is envisaged for the tunnel under Chapel Hill (with construction compounds either side) and the new railway junction, plus (11.2.17) two main construction compounds south of Comberton, and another adjacent to the road alignments of Comberton Road (B1046) and Cambridge Road (A603).
- Such massive land take, along with its haul roads and associated environmental impact, will in no way be – as EWR claims – 'temporary' in terms of the sustainability of the vulnerable Barbastelle bat population, especially within its CSZ, posing a serious risk of extinction to the SAC's maternity roost well before the railway is even operational.
- EWR (11.2.20) also argues that construction compounds and the haul routes connecting them would be 'predominantly rural', enabling mass haul movements to avoid and reduce impacts on public highways. While such mitigation may indeed result, this nevertheless represents a huge level of land take from the Barbastelle bats' CSZ, with all the associated multiple risks (see 1<sup>st</sup> bullet, above).

**4.109:** *'Eversden and Wimpole Woods SAC and Devil's Dyke SAC support habitats which are not considered susceptible to impacts from water and therefore, changes in*

*water quantity and quality as a result of proposed growth in the GCLP are not predicted to result in any likely significant effects to these Habitats sites.'*

- Consideration needs to be given to the impacts of construction on the hydrology within the CSZ of the Eversden and Wimpole Woods SAC's Barbastelle bats, notably construction of Bourn Airfield New Village and EWR (proposed tunnel and also viaducts over Bourn Brook and River Rhee chalk stream). Both watercourses are major and vital foraging and commuting corridors for the Barbastelle bats (also as habitat for otters and water voles), as acknowledged by EWR Co.  
(<https://eastwestrail.co.uk/consultation2024/environmental-update-report>)

**4.117:** *'Habitats can also be affected by changes in water quality such as nutrient enrichment, changes in salinity, smothering from dust, and run-off, discharge or spillage from industry, agriculture, or construction. Changes in water abstraction, discharge and land use can also affect water quality, for example a change in land use from agriculture to residential, applicable to these proposals, reduces direct nutrient run-off to watercourses but increases the volume of nutrient discharge from wastewater treatment works.'*

- Consideration needs to be given where nutrient discharge is occurring within the CSZ of the Eversden and Wimpole Woods SAC's Barbastelle Bats, e.g. Bourn wastewater treatment works discharging into Bourn Brook and Haslingfield wastewater treatment works discharging into the River Rhee chalk stream. Both watercourses are vital foraging and commuting corridors for the Barbastelle bats (also as habitat for otters and water voles), as acknowledged by EWR  
(<https://eastwestrail.co.uk/consultation2024/environmental-update-report>).

#### **Habitats Regulations Assessment of Greater Cambridge Local Plan – Appendix C Local Plan - Sites and Policy Areas Policy S/NST Bourn Airfield New Village §C.278**

*'Potential impacts if policy is implemented: Physical damage/disturbance (offsite); Non-physical disturbance (on and offsite); Non-toxic contamination; Air pollution; Recreation and urban impacts v Increased water abstraction; Increased water treatment; Direct surface water run-off'.*

- This is a prime example of where the Local Plan needs to consider in-combination effects with the co-location of the EWR proposed tunnel. While Policy S/BA of the Local Plan notes the importance of coordinating phases of construction with EWR's proposed tunnel in order to *'minimise disruption as much as possible'*, the Local Plan needs to be explicit that - in terms of the village development in conjunction with EWR construction - the full range of relevant, significant impacts will be assessed on Barbastelle bats from the maternity roost in Eversden and Wimpole Woods SAC, as well as from the Barbastelle bat maternity roost discovered by EWR survey in Hardwick Wood SSSI which is much closer to Bourn Airfield.
- For example, for the Barbastelle bat, a species whose survival depends on fine-tuned echolocation, noise 'pollution' needs to be critically assessed and measured at a range of frequencies audible to the bats (rather than weighted for human hearing). The noise source and its emission height across open space are also relevant parameters. Given that the guidance for the ground level distance at which noise can

impact Barbastelle bats is up to 500m (HRA report para 4.21), consideration needs to be given to increasing this distance where the noise source is elevated, as it will be for EWR's proposals within the bats' CSZ for viaduct design and embanking track up to a height of ca.11m.

- EWR's proposed tunnel at Bourn Airfield eliminates some of the noise and vibration impact on the bats (and also reduces collision risk). However, the tunnel's exit/entry point in Highfields Caldecote adjacent to the Ancient Woodland of All Angels Park (Phase 1 of the housing development) does not adequately protect the Barbastelle bats at this site which EWR has already recognised as having HPI (Habitat of Principal Importance) following survey which identified the trees as having HRP (High Roost Potential) for Barbastelles.

24. The Local Plan needs to be explicit in spelling out that such considerations are in scope for its HRA process, including appropriate assessment. It is a major concern that we don't see any such acknowledgement in this Draft of the GCLP.

25. We consider that the HRA carried out by LUC is lacking in evidence to inform a robust appropriate assessment. See **Appendix 2** (below) for comments similar to ours, made by Planning Inspectors to Wiltshire Council's HRA (Dec 2025), also undertaken by LUC.

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## **Appendices to Cambridge Approaches' response to the Local Plan**

### **Appendix 1**

#### **A1.1 Projects/schemes and developments (within 10km approx of the Eversden and Wimpole Woods SAC) which may, in isolation or in-combination, significantly affect the integrity of the SAC.**

CAMBOURNE NORTH – 693ha EWR dependent housing and associated development for the increasing population of 53,400 people - where it will be essential to provide clear flight paths and a 2km buffer zone around the different woods used as roost sites by the barbastelles i.e. Elsworth, Overhall Grove, Knapwell.

CAMBOURNE TRANSPORT HUB - EWR Station and C2C Busway, associated car parking /cycle parking.

CAMBOURNE - S/2903/14/OL Land to the west of Cambourne. [*6.8km north of the SAC*]

CAMBOURNE – 24/01548/FUL Land North and South of High Street Cambourne - Erection of 87 apartments, 30 townhouses, 1,401sqm commercial, realignment of existing road, public space and landscaping.

CAMBOURNE – 24/01182/FUL Kindred Cambourne Nursery and Pre-School, High St, Cambourne CB23 6BJ.

CAMBOURNE – 23/00123/FUL Land South of Pond Cambourne Business Park, Cambourne - Erection of 256 dwellings and change of use of existing marketing suite to café, landscaping, car parking etc.

CAXTON – 24/01817/REM Land at St Peter's Street, Caxton CB23 3PS - Erection of 9 self-build plots and associated garaging.

CAXTON – 24/02508/PRIOR Grange Farm Bourn Road, Caxton CB23 3PP - Change of use of agricultural buildings to 5 dwelling houses.

BOURN AIRFIELD - Bourn Airfield development 3,500 homes and associated facilities and infrastructure, 171.81ha.

BOURN QUARTER - 20/02568/FUL Phase 1 Wellington Way - Redevelopment of the former Gestamp Factory site at Bourn Airfield for up to 26,757sqm for commercial floorspace purposes. Development is subject to EIA.

BOURN QUARTER – 24/03275/SCOP Phase 3, Wellington Way, Caldecote CB23 7FW - Scheme to deliver 7,800 sqm gross external area of floorspace along with associated infrastructure and car parking.

BOURN - 24/00414/FUL Great Common Farm Broadway Cambridgeshire Bourn CB23 2TE - Demolition of existing agricultural buildings and replacement with 4 dwellings, alterations and conversion of agricultural buildings to residential ancillary buildings.

CHILDERLEY GATE – Development between A428 and St Neots Road.

HIGHFIELDS CALDECOTE – Land behind Jason's Farm development next to Hardwick Wood SSSI. [*where EWRCo has confirmed the discovery of a barbastelle maternity roost*]

HIGHFIELDS CALDECOTE - Linden Homes (All Angels Park) development Highfields Caldecote 140 homes in 2 phases (66 homes already built), 6.04ha.

HIGHFIELDS CALDECOTE - 24/01754/FUL Demolition of Existing Dwelling and Outbuildings and the Erection of 6 Dwellings together with associated Works. Westwind Highfields Road, Highfields Caldecote CB23 7NX.

HARDWICK – Land for development north of St Neots Road, Hardwick, 4.62ha.

HARDWICK - S/0113/16/E1 EIA Screening Opinion: for up to 200 dwellings, associated Land to west of Hall Drive, Hardwick, Cambridge.

HARDWICK – 24/02099/FUL Newton House, 147 St Neots Road, Hardwick CB23 7QJ - Redevelopment to form 2 No. 1 bedroom, 5 No. 2 bedroom and with associated car parking.

HARDWICK – 24/01913/S73 Pumping Station, Grace Crescent, Hardwick CB237AH - 98 dwellings and associated works.

COMBERTON – Retirement village complex of 200 homes, clubhouse and other infrastructure. With 144 additional extra care units applied for.

COMBERTON – Land at Bennell Farm 3.91 hectares to build 90 units (houses and flats).

COMBERTON – 24/00786/FUL Gage Farm, Branch Road, Comberton CB23 7DH  
Demolition of existing dwelling and outbuildings and the erection of a replacement dwelling, detached garage etc.

COMBERTON – Site Ref 40261 Land at Branch Road and Long Road, Comberton CB23 7DL, Agricultural land 100% Grade 2, Estimated dwelling units 130.

COMBERTON – Site Ref 40310 Land to the west of South Street, Comberton CB23 7DR, Agricultural land 100% Grade 2, Estimated dwellings 120.

COMBERTON – Site Ref 40501 Land at Bush Close, Comberton CB23 7AP, Agricultural land 100% Grade 2, Estimated dwellings 120.

TOFT – 20/01992/FUL Bennell Farm West Street, Toft CB23 7EN Erection of 41 dwellings, including two self-build plots and associated development.

MADINGLEY – 24/02872/FUL Three Horseshoes CB23 8AB - Erection of accommodation block to create 12 bedrooms and accompanying car park.

NORTH-WEST CAMBRIDGE - 24/04533/SCOP Request for an EIA Scoping Opinion with respect to proposed development of up to 4,200 dwellings, 1,675 student bedspaces, 675 co-living units, 6,500sqm senior living accommodation, 100,000sqm flexible employment floorspace etc

CAMBRIDGE - 17/1799/FUL 08/18 and 04/24JJ Thomson Ave CB3 0FB.

TRUMPINGTON WEST – Green field development. [*New homes 8km to the east of the SAC*]

GRANGE FARM (west Cambridge) – Land for development, 1.21ha.

GRANGE FARM – Land adjacent to A11 and A1307 6,000 new homes approx. 20,000m<sup>2</sup> of logistics hub/warehousing, 12 gypsy and traveller pitches, local centre, mixed retail, commercial and community facilities, educational facilities.

ADDENBROOKE'S HOSPITAL SITE – Land for development, 68.21ha.

CAMBRIDGE BIOMEDICAL CAMPUS EXTENSION – Land for development, 8.914ha.

CAMBRIDGE BIOMEDICAL CAMPUS FURTHER NEW EXTENSION – Land for development, 8.22ha.

BELL SCHOOL – Babraham Road Land for development, 7.61ha.

DARWIN GREEN – Land for development between Huntingdon Road and Histon Road, Cambridge, 84ha.

MELBOURN – Land to west of Cambridge Road, Melbourn, 6.65ha.

MELBOURN – The Moor, Moor Lane, Melbourn Land for development, 1.08ha,

GREAT SHELFORD – Land between Hinton Way and Mingle Lane for development, 6.14ha.

HAUXTON – Redrow Homes Land for the development on the south side of High Street, Hauxton, Title number CB429802.

HAUXTON - 23/03080/OUT FORMER WASTE TREATMENT FACILITY, Cambridge Rd, Hauxton CB22 5HT - Demolition of existing structures and redevelopment for employment (office and laboratory) floorspace alongside a new amenity building, country park, 0.40ha.

HARSTON – 24/01199/OUT Centenary Works, Button End, Harston CB22 7NX - Demolition of existing buildings and replaced with 7 gypsy and traveller pitches.

HARSTON – Site Ref 40476 Land at Royston Road, Harston CB22 7NH Agricultural land 100% Grade 2, Estimated dwellings 145.

ARRINGTON - 24/01371/REM Kingston Pastures Farm, Old Wimpole Road, Arrington SG8 0BX - Demolition of agricultural buildings and erection of 5 dwellings.

ELTISLEY – 24/02919/FUL Manor Farm, Caxton End, Eltisley PE19 6TJ - Rebuilding and restoration of 5 Barns.

GAMLINGAY – 24/01080/OUT Land at Green End/Heath Road, Gamlingay, Sandy SG19 3JZ - 9 Self/custom build residential dwellings.

GAMLINGAY – 24/01257/FUL Land rear of 33 Church Street, Gamlingay SG19 3JH - Demolition of existing commercial buildings and erection of 5 dwellings and associated parking amenity space and landscaping.

## **A1.2 Transport, including major infrastructure projects**

- EAST WEST RAIL PROJECT – <https://eastwestrail.co.uk/> including a Train Maintenance Depot (with train washing and wheel lathe facilities) and sidings at Cambourne. See Chapter 14.4, pp 404 – 417 of <https://eastwestrail.co.uk/consultation2024/technical-report>
- A428 BLACK CAT TO CAXTON GIBBET ROAD IMPROVEMENT SCHEME <https://nationalhighways.co.uk/our-roads/a428-black-cat-to-caxton-gibbet/>

- CAMBOURNE to CAMBRIDGE (C2C) Guided busway  
<https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/C2C-Project-Update-March-2023.pdf>  
<https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/C2C-EIA-2022/C2C-ES-Scoping-Report-Submission-to-DfT.pdf>
- COMBERTON GREENWAY  
<https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Active-Travel-Projects/Greater-Cambridge-Greenways/Comberton-Greenway/Comberton-Greenway-Public-Engagement-Brochure-2022.pdf>

### A1.3 Other land use projects

- AFFINITY WATER and ANGLIAN WATER - AECOM  
<https://www.anglianwater.co.uk/SysSiteAssets/household/about-us/a2at-gate-2-submission-annexc-habitats-regulations-assessment-final.pdf>
- GRAFHAM WATER PIPELINE – Grafham water reservoir to Madingley.
- DRY DRAYTON – Scotland Farm **Park & Ride** 13.4ha 2,000 car parking spaces 300 cycle parking spaces.
- HAUGHTON M11 – **Park & Ride** extension 2,260 car parking spaces.
- BASSINGBOURN BARRACKS – **Solar Farm** - land belonging to Bassingbourn Barracks.
- CHILDERLY – 21/02173/FUL **Solar Farm** - land to the North-East of Childerley Farm, Childerly Estate.
- MELBOURN – **Solar Farm** - Black Peat Farm, London Road, Melbourn.
- ROYSTON – **Solar Farm** - land at Highfield Farm, Royston.
- WIMPOLE HALL – S/1694/18/FL **Multi-use Trail**  
<https://scamb.smodern.gov.co.uk/documents/s107946/Wimpole%20Hall%20MUT%20Committee%20report.pdf>

## **Appendix 2: Shared issues with LUC's HRA for Wiltshire Council's Local Plan**

1. It is interesting to note that on 22<sup>nd</sup> December 2025 the Planning Inspectors (Philip Mileham and Gareth Wildgoose) wrote to Wiltshire Council about a recent HRA undertaken by LUC (Land Use Consultants Ltd) for the Council's Local Plan ([https://www.localplanservices.co.uk/files/ugd/017f5b\\_96ca54a25d31447994fcbe6c4772c2da.pdf](https://www.localplanservices.co.uk/files/ugd/017f5b_96ca54a25d31447994fcbe6c4772c2da.pdf)).
2. The Inspectors raised a number of the same issues we have found wanting within LUC's HRA of the GCLP, namely (para numbering as in the Inspectors' letter):

*Para 10: 'There is also insufficient evidence to inform the HRA conclusion of no likely significant effect on European sites.'*

*Para 11: 'Setting aside the inconsistency between the HRA and the Plan, the intention of Policy 21 to confirm the new community only through a future review suggests it is not currently supported by sufficient evidence.'*

*Para 12: 'However, when taking account of the shortcomings of the SA [Sustainability Appraisal] assessment and the lack of detailed HRA assessment, the Plan's approach is not justified nor consistent with national policy...'*

*Para 21: 'The additional work should include updates to the SA to assess the broader range of reasonable alternatives and the HRA to both inform the proposed modifications to the Plan and to ensure that the cumulative effects are appropriately assessed and addressed.'*

*Para 23: 'Updates to the HRA would also be required to assess any proposed changes that the Council provide to us, including in terms of the cumulative effects with plans and projects elsewhere.'*

*Para 27: 'Adequate and proportionate updates to key evidence, sufficient to inform robust SA and HRA assessments and justify the proposed changes, are likely to be required.'*

*Para 33: 'This should be informed by updates to the SA and HRA, which should consider a range of reasonable alternatives...'*