



National  
Trust

30 January 2026

Greater Cambridge Planning Policy

By email only: [localplan@greatercambridgeplanning.org](mailto:localplan@greatercambridgeplanning.org)

Dear Sir or Madam

## Draft Greater Cambridge Local Plan (Regulation 18) Consultation

### Representation from the National Trust

This response to the Draft Greater Cambridge Local Plan (Regulation 18) Consultation is made on behalf of The National Trust for Places of Historic Interest or Natural Beauty (“the Trust”).

In 2025, the Trust published its 10-year strategy “People and Nature thriving”. At its core are three ambitious 2050 goals:

#### Restore nature

To reverse the decline in nature we’ll focus on local efforts to move toward the global target of protecting 30% of land. We’ll do this by putting the long-term interests of nature and people first in our decisions. And we’ll help millions of others, and those who serve them, do the same.

#### End unequal access to nature, beauty and history

The places that we care for as a charity were once held in private hands and enjoyed by only a few. Now these precious buildings, monuments, gardens and landscapes belong to all of us, welcoming more than 150 million visits each year. But inequality across our nations means many people don’t have enough nature in their lives to be healthy, or enough cultural experience to feel valued. Using all that’s been given to the National Trust, there’s much more we can do, for more people.

#### Inspire millions more people to care and take action

We can’t deliver the first two goals on our own – millions of people will need to join in. To make sure we’re doing our best to preserve and expand our natural and cultural

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inheritance, our ambition now needs to go way beyond National Trust places. There are millions of people who care and want to take action – we meet them every day in our work.

## **National Trust owned land**

The National Trust owns and manages the Wimpole Estate within the Greater Cambridge planning area. Along with Anglesey Abbey, Northfield Farm and Wicken Fen nearby in adjoining East Cambridge. Much of this land has been declared “inalienable”. This status enables the Trust to live up to its core charitable objective of preserving places of historic interest and beauty for the nation, forever.

Growth within Greater Cambridge could impact each and all of these sites. But any adverse impacts could be managed with appropriate mitigation. Furthermore, with collaborative working, they could also offer potential opportunities to support growth through access to greenspace, nature and heritage. Further detail is set out below.

## **Wimpole Estate**

Wimpole Estate is a regionally significant heritage destination and one of the National Trust’s top 15 most visited mansion properties, attracting over 400,000 visitors in 2025. It is home to 29 listed buildings including the Grade I listed mansion and 3 Grade II\* buildings, a Grade I Registered Park and Garden, the largest Scheduled Monument in Cambridgeshire, a rare breed farm, and the only in-hand lowland arable farm within the Trust. The estate also features unique historic assets such as the Gothic Folly (Grade II\*) and Sir John Soane’s Home Farm, which includes the Grade II\* Great Barn. It is a County Wildlife Site and has the 2<sup>nd</sup> most recorded species in the National Trust. As a major cultural and green space resource, Wimpole plays an important role in the regional tourism economy and serves as a strategic recreational area for communities across Cambridgeshire, Hertfordshire, and Bedfordshire.

Located in South Cambridgeshire within the Wimpole Chalk Hills Landscape Character Area, and the Rhee Tributaries catchment area, the estate is surrounded by chalk hills, small villages, and priority habitats such as deciduous woodland and lowland calcareous grassland. The landscape is considered an almost complete and well-preserved example of 18th-century design, shaped by influential architects and landscape designers. Since 1976, the National Trust has managed Wimpole, ensuring its conservation and accessibility. Its historic and ecological significance makes it a defining feature of the local character and a vital contributor to biodiversity and heritage in the area.

To the north of the Wimpole Estate is the Eversden & Wimpole Woods SAC and SSSI. The site comprises a mixture of ancient coppice woodland (Eversden Wood) and high forest woods likely to be of more recent origin (Wimpole Woods). The woods are designated as an SAC due to the presence of a colony of barbastelle bats. The trees are used as a summer maternity roost where the female bats gather to give birth and rear their young. Some of the woodland is also used as a flight path when bats forage outside the site.

Wimpole is one of the largest open green spaces near Cambridge and Royston, offering year-round events that attract diverse audiences and promote engagement with nature and heritage. Visitor numbers have grown dramatically, and this growth underscores its

importance as a regional economic driver and community asset. The new local plan should recognise Wimpole's heritage, landscape, and recreational value, ensuring policies support its conservation, accessibility, and integration into wider green infrastructure and tourism strategies.

In 2023 the National Trust commissioned external consultants to prepare a Spatial Plan for the Estate. The purpose of the plan was to identify opportunities to improve flow, functionality and access for all, exploring opportunities in the wider estate and providing better operational circulation, improving the visitor experience. Also, to identify locations for new visitor infrastructure. Officers from Greater Cambridge Shared Planning and Historic England were involved in this process. The Spatial Plan is now being used to inform decisions and guide the future development of the Estate.

The Estate is located in a rural area to the southwest of Cambridge. One of the existing problems is that it is not well served by public transport and has poor connectivity to the city and areas of proposed growth to the west of the city, including Cambourne and Bourn Airfield.

### **Anglesey Abbey**

Anglesey Abbey located at Lode, is approximately 9km north-east of central Cambridge on the northern side of the B1102 Cambridge to Bottisham road. The Anglesey Abbey estate comprises a Grade I listed Jacobean-style house with Grade II\* Registered Park and Garden and an 18<sup>th</sup> century watermill (Grade II\*) on the lode. It is the former country house of Lord Fairhaven. On his death in 1966 Lord Fairhaven left Anglesey Abbey and its extensive grounds to the National Trust, who have conserved his gardens and in whose hands it remains. The site's modern visitor centre was built in 2007. Annual visitors to Anglesey Abbey are anticipated to hit 440,000 in 2026.

The existing visitor attraction includes c.40 hectares of garden and parkland. Northfield Farm, comprising c.140 hectares of farmland, woods and buildings to the north and south of the property came back in-hand to the Trust in 2025.

Anglesey Abbey is a relatively constrained site due to its physical boundary and size. It is experiencing year on year visitor growth, which is putting pressure on existing visitor infrastructure and the Registered Park and Garden.

### **Northfield Farm**

The National Trust has recently taken back in hand Northfield Farm. This is located on the eastern side of Lode Road. Although it falls with the East Cambridgeshire local authority area, it is less than 1km from the boundary with Greater Cambridge. Northfield Farm comprises three land parcels; 104ha on the eastern side of Lode Road, a small parcel to the north of this, and 28ha of land adjoining the Anglesey Abbey estate. The site includes buildings, a farmyard, agricultural land and woodland.

The long-term vision for the site is to create a new community woodland and nature park on the land, providing a much-needed green recreation space in Cambridgeshire. It is also

needed operationally to relieve visitor pressure on the facilities and Registered Park and Garden at Anglesey Abbey. It could also help to relieve pressure on the surrounding SSSI sites at Wicken Fen, Quy Fen and Great Wilbraham Fen. The scale of the site provides an exciting opportunity to meaningfully contribute to realising the Local Plan Vision to increase the network of nature, wildlife and multi-functional greenspaces and communities' quality of life, supporting national and regional strategies to double nature, deliver biodiversity net gain and carbon reduction targets through woodland creation, and to the National Trust's 'People and Nature thriving' strategy goals through habitat creation and opening up access to the land.

It could be a potential Suitable Alternative Natural Greenspace (SANG) for planned developments on eastern side of Cambridge or windfall sites. Natural England's SANG guidance does not require SANG to sit within the same administrative boundary as the development it mitigates. Instead, it focuses on functional relationships, catchment distance, capacity, securing delivery and long-term management.

The National Trust will shortly be beginning feasibility for options for the future of this land.

## **Wicken Fen**

Wicken Fen is the National Trust's first nature reserve, with 2 acres bought in 1899. Over the years since then, many acquisitions later, the reserve has expanded to over 2000 acres. Wicken Fen, one of Europe's most important wetlands, supports an abundance of wildlife. The 10,000th species has recently been recorded at the site, including a spectacular array of plants, birds and dragonflies.

The site is highly designated as a: National Nature Reserve (NNR); Site of Special Scientific Interest (SSSI); Special Area of Conservation (SAC: Fenland (part)); Ramsar wetland of international importance.

Internationally significant wetland reserves such as Wicken Fen are reliant on water abstraction licenses, yet with no summer license being granted to the National Trust, areas of the reserve remain in unfavourable condition. This lack of summer water availability is causing continued degradation of peat soils, resulting in a loss of carbon stores.

Despite growing in size, the nature reserve is too small and isolated to guarantee the survival of all its rare and numerous species. It is also under pressure from the increasing number of people seeking its peace and tranquillity.

The part of the site which is designated as a SSSI faces increasing pressures from rising visitor numbers and recreational pressure.

The National Trust has recently commissioned a Spatial Plan for Wicken Fen. This will provide a masterplan that will seek to improve visitor arrival, core site facilities, and wider reserve connectivity, dispersing visitors away from sensitive areas and enhancing nature engagement. By integrating sustainable design, active travel links, and phased infrastructure upgrades, the framework will ensure that Wicken Fen presents as one unified destination that balances conservation with access, builds resilience to climate change, and delivers high quality nature engagement for future generations.

Visitor access, while largely drawn to the visitor centre set within the National Nature Reserve, includes increasing use via the fen edge villages that surround the wider reserve and Vision area. Currently accessed either by car or a via limited network of recreation routes.

This area has been recognised in local policy as strategically important for biodiversity enhancement and landscape-scale restoration. It is critical to safeguard internationally significant habitats while planning for predicted growth from an estimated 110,000 visitors today to nearly 200,000 by 2041.

### **Wicken Fen Vision**

Launched in 1999, the Wicken Vision is a 100-year plan to create a diverse landscape for wildlife and people, a historic landscape that will provide space in the modern world to breathe, think and explore.

Connecting northwards from Cambridge to Wicken, our vision is an expanded area of fenland that contains a network of wildlife-rich habitats. Working in partnership with stakeholders and landowners this landscape will buffer and protect Wicken Fen, one of the UK's most biodiverse sites and one of the last remaining fragments of undrained fen in East Anglia. It will provide better access to nature in an area with limited greenspace and significant growth, benefitting local people's health and wellbeing.

The Wicken Fen Vision is a landscape scale conservation initiative aligned with East Cambridgeshire District Council's Local Plan objectives for enhancing green infrastructure, biodiversity and public access. The Vision area has also been included in the Cambridgeshire and Peterborough Local Nature Recovery Strategy (published December 2025) and is identified as 'one that could become of particular importance for biodiversity' (ACB).

### **Proposed Site Allocations**

#### S/NEC: North East Cambridge

The National Trust notes the complexities associated with the development of this site (which is reliant on the relocation of the Cambridge Wastewater Treatment Plant) as a result of the withdrawal of funding from the Government.

If this site does form part of the Council's strategy and becomes available for development, the policy should ensure that opportunities for green and blue infrastructure and sustainable connections along the river Cam and into the Wicken Vision Area are provided.

#### S/CE: Cambridge East

The National Trust strongly support the requirement to provide strategic scale green infrastructure beyond the site to connect Cambridge City Centre to the Wicken Vision area, reducing recreational pressure on designated sites.

The policy requires provision of a country park beyond the site to connect to the Wicken Vision area. It is noted that the location, scale and character of this site is yet to be determined. Work needs to be undertaken to establish this, in order that it can be identified in the proposed Submission Plan. It also needs to be clear how and when the country park will be delivered, in order that it is available for use prior to the occupation of new dwellings at Cambridge East.

The National Trust would welcome engagement in discussions about green infrastructure delivery and suggest that consideration is given as to whether our site at Northfield Farm could assist with this provision.

#### S/CBN: Cambourne North, S/CB: Cambourne, S/BA: Bourn Airfield New Village

These policies seek to ensure that adequate green infrastructure is provided on site to provide Suitable Alternative Natural Greenspace (SANGs) to compensate for any additional recreation pressure on nearby SSSIs. Policy S/CBN also refers to 'Cambourne Forest', "a new, accessible, regionally-significant woodland arc". The National Trust strongly supports the provision of on-site SANGs and new woodland. In accordance with guidance from Natural England, SANGs must be developed and available for use prior to the occupation of the new dwellings which they are intended to serve. The provision of new recreational space and woodland would help ease pressure on these sites and their designated features. However, it is not clear where the woodland would be located or how it would be delivered. This needs to be made clear in the proposed Submission Plan.

The Wimpole Estate, including Eversden and Wimpole Woods SAC/SSSI is located approximately 6km to the south of Cambourne. Even if significant green infrastructure is delivered, the Wimpole Estate is an important heritage asset and tourist destination within Greater Cambridge and an established green space on the western side of Cambridge. It will inevitably draw visitors from the new developments at Cambourne and Bourne Airfield. However, it is currently poorly connected to these locations by sustainable transport. Policy S/CBN promotes better connections and sustainable modes of transport to surrounding villages, facilities and open spaces. The National Trust would welcome discussions with the LPA and developers about the opportunity to work in partnership to deliver sustainable transport options between Cambourne/Bourn and Wimpole

## S/WNT: Land north of Waterbeach

Waterbeach is located approximately 6km to the southwest of Wicken Fen NNR and to the west of the Wicken Vision Area.

Policy S/WNT seeks to promote cycling, walking and horse riding as the preferred mode of transport from the outset of the development, by creating a movement network, including footway and cycleways. To access Wicken Fen and Anglesey Abbey from Waterbeach, residents have no option other than to travel by car. The National Trust considers that Waterbeach could be far better connected to the Wicken Vision Area and Wicken Fen via a foot/cycle bridge over the River Cam which would provide a more direct route via sustainable modes of transport. This development should look beyond its boundaries to provide access to the wider landscape, particularly to the east. This should be included in the policy. The National Trust would welcome the opportunity to discuss this further. The National Trust are currently working with partners to deliver a new foot/cycle bridge over Burwell Lode to improve access to the south of Wicken Fen.

## **Development Strategy (Chapter 2)**

### Policy S/DS: Development Strategy

Whilst the National Trust supports the plan-led system in principle, and broadly supports the development strategy and approach to site allocations, we have concerns about amount of growth on the northeast and eastern sides of Cambridge, and recreational pressure on our sites arising from North East Cambridge (8,350 homes), Cambridge East (7000+ homes), and Waterbeach new town (11,000 homes). Further detail is set out below.

### Transport Strategy

It is acknowledged that the Local Plan is informed by the location of existing and committed public transport schemes and that a 'Greater Cambridge Transport Strategy' is being prepared by the Cambridgeshire and Peterborough Combined Authority. However, the National Trust has a key site within Greater Cambridge (the Wimpole Estate) and two within 1km of the boundary of Greater Cambridge (Anglesey Abbey and Wicken Fen) which are important heritage, greenspace and tourism facilities for its residents and visitors. Their importance to Greater Cambridge should not be undervalued. All three of these sites are poorly connected to the city and to the proposed strategic development sites, with very limited opportunities to access the sites by sustainable transport modes. This is an issue that the National Trust are very keen to address but cannot do this in isolation. We are keen to work with other stakeholders and partners to seek opportunities to improve these links.

### Policy S/GB: The Cambridge Green Belt

We support this policy. Green Belts around our towns and cities are an important planning tool which prevent urban sprawl and this layer of protection for our countryside and the settings of historic towns and cities is extremely valuable.

Green Belts have the potential to deliver much more public benefit. We would like to see the quality of land improved for people and for nature, with more space for wildlife and better access for those living in nearby cities and towns. Green Belt land could also play an important role in helping the UK tackle climate change and reduce the risk of flooding in urban areas.

Any changes to Green Belt boundaries must be fully evidenced and justified and formally decided through the Local Plan process, and any development must be delivered in a sustainable and strategic way.

## **Climate Change (Chapter 4)**

### Policy CC/WE: Water efficiency in new developments

This policy sets the levels of water efficiency that new developments must comply with, responding to the water supply pressures facing Greater Cambridge and the need to protect the water environment.

As the supporting text sets out, Cambridge is classified as an area of ‘serious water stress’. Cambridge Water’s WRMP (March 2025) outlines that sufficient water availability can be provided to meet the needs of growth in the Cambridge Region between 2025 and 2050 through measures including Anglia Water Transfer and new Fens Reservoir<sup>1</sup>, provided sufficient water efficiency standards and best practise in terms of mitigation measures are implemented<sup>2</sup>. Growth is phased in the GCLP so that it aligns with water availability in the region, with large scale development delayed until 2032<sup>3</sup>.

All of the potable water supplying Greater Cambridge is currently obtained from nearly 100% abstraction of chalk aquifers, any increase in development as a result of the Local Plan has the potential to result in an adverse effect on Habitats sites susceptible to impacts from changes in water quantity in-combination with development in areas outside of the GCLP area<sup>4</sup>. The reduced flow from the aquifer has put additional ecological stress on chalk streams and their associated habitats both within and outside of the Greater Cambridge area. Measures need to be put in place in the short term to balance additional losses of flow with proposed development.

It will be vital for new developments to comply with the water efficiency measures in Policy CC/WE, both until the new supply side measures come online, and continuing into the future to make efficient use of this constrained resource. Policy CC/WE should be amended to require all new development to provide a project level assessment of water quantity to demonstrate that it would not result adversely affect water sensitive designated sites.

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<sup>1</sup> HRA of Greater Cambs Local Plan para 5.59

<sup>2</sup> Ibid para 5.64

<sup>3</sup> Ibid para 5.62

<sup>4</sup> Ibid para 5.49 – 5.52

## Policy CC/RE: Renewable energy projects and infrastructure

The National Trust is supportive of renewable energy in principle. However, the landscape character, tranquility, sensitive views, and future Wicken Vision ambition are all being adversely affected by the amount of solar and associated infrastructure being developed in the Vision area. We note that the policy states that these developments should not cause unacceptable impacts, including cumulative and cross-boundary impacts, but consider that this policy could be strengthened to put the onus on the developer to undertake an assessment of cumulative and cross-boundary impacts. Furthermore, any proposed renewable energy/infrastructure that is within the Greater Cambridge area and is functionally linked to designated sites should be avoided.

## Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks

The National Trust supports the inclusion of draft policy CC/CS which seeks to protect existing carbon sinks through protecting peat, including during the construction of new developments.

Healthy, waterlogged peatlands trap and store carbon. They are one of our greatest weapons in the fight against climate change, provide vital habitat for some of our most threatened plant and animal species, and preserve unique archaeological and palaeoecological records. Activities and siting of development on peatlands can result in damage to the historic environment, to peatland function and associated species, habitats and wider ecosystem services. Damaged peatlands shift from storing and capturing carbon to becoming a source of carbon and other greenhouse gases.

In addition to carbon capture and habitat provision, peatlands and their habitats are natural water filters, helping to clean water meaning less energy and cost is required by water companies to treat water. Degraded peat releases dissolved organic carbon (DOC) and sediments, staining water brown, increasing treatment costs, and affecting pH, while restoration (like rewetting) helps reverse these negative effects, improving clarity and reducing pollutants.

The wording of Policy CC/CS should include an additional numbered point to reinforce the need to consider the link between the impact of proposed development on water availability and peat condition:

*7. Major development proposals must demonstrate how water quantity impacts have been minimised in accordance with Policy CC/WE. This information must include a project level assessment of the impact of the proposed development's water supply on peat soils. Development will only be permitted where it can be demonstrated that the proposals will not adversely affect the integrity of the designated site(s), either alone or in combination with other plans or projects.*

## **Biodiversity and green spaces (Chapter 5)**

### Policy BG/BG: Biodiversity and geodiversity

The National Trust supports this policy. Proposed new development must follow the Mitigation Hierarchy and provide appropriate mitigation for recreational impacts on designated sites, including the provision of SANGs, in accordance with Natural England's guidance and advice.

### Policy BG/GI: Green and blue infrastructure

The National Trust strongly supports the Strategic Priority to increase and improve the network of habitats for wildlife, and green spaces for people, ensuring that development leaves the natural environment better than it was before.

The policy identifies 14 Green Infrastructure Initiatives as priorities for enhancing strategic green infrastructure across Greater Cambridge, and that financial contributions from major developments towards the establishment, enhancement and on-going management costs will be sought. These include (4) the 'Enhancement of the Eastern Fens' and (10) Expanding Greater Cambridgeshire's urban forest'. The National Trust advocates that these initiatives should be of a suitable scale, high quality, deliver for nature and be responsibly managed.

However, detail around these initiatives is lacking, including location, objectives and delivery. It is noted that the Council are developing a 'suite of green infrastructure standards' and are continuing to explore how they deliver these through the policies in the plan. It is understood that the approach may be refined at Proposed Submission stage. The National Trust would be happy to engage in discussions with Greater Cambridge about how we may be able to support the refinement and delivery of the eastern fens and urban forest initiatives.

### Policy BG/EO: Providing and enhancing open spaces

The National Trust agrees with the wording of this policy which states that new development must address its open space requirements (which must be clearly set out within the policy) through on-site provision and/or financial contributions for off-site provision, including future management. An additional bullet point should be added to ensure that the open space is provided and available to use prior to first occupation of the dwellings.

It is noted that the supporting text at Para. 5.77 states that "The Councils are also exploring the most appropriate way for development to contribute to meeting the Greater Cambridge's evidenced need for additional strategic scale green space including for country parks". As set out above, the National Trust will soon be commencing feasibility for Northfield Farm. We would be happy to engage in discussions with Greater Cambridge about whether we could help facilitate some of this provision.

## **Great Places (Chapter 7)**

### Policy GP/HE: Historic environment

We are pleased to see the Plan recognises Greater Cambridge's historic environment as an important social, cultural, economic, environmental and community resource, which adds to the quality of life of residents and visitors (para 7.56) and Wimpole's contribution to this as an important visitor attraction with historic merit.

### Policy GP/HA: Designated heritage assets

Para. 7.66 notes historic landscapes including historic parks and gardens are particularly important in South Cambridgeshire where they add interest and variety to the countryside. Grade II\* Pampisford Hall and Grade II\* Croxton Park are specifically highlighted in the South Cambs district but Grade I Wimpole Hall RPG which is by far the largest Registered Park and Gardens, and one of only two Grade I RPG in Greater Cambridge, is not mentioned which fails to recognise its importance and rarity (only around 10% of England's RPG are designated Grade I). The text should be amended to include Wimpole Hall Registered Park and Garden.

### Policy GP/CC: Adapting heritage assets to climate change

It is important for heritage assets to contribute to addressing climate change. The National Trust is supporting research into delivering retrofit for heritage buildings to identify issues in practical delivery of historic building retrofit and better understand the challenges. We support Policy GP/CC which establishes how works to enhance the environmental performance of heritage assets will be balanced against the need to protect and enhance the character and significance of that asset.

## **Jobs (Chapter 8)**

### Policy J/ VA: Visitor accommodation, attractions and facilities

We are pleased to see references to Wimpole Hall as a major tourist visitor attraction, and support policy J/VA which seeks to support existing attractions and new associated infrastructure where appropriate.

## **Infrastructure (Chapter 10)**

### Policy I/ST: Sustainable transport and connectivity

The policy requires a vision-led approach to transport rather than the predict and provide model, which reflects the shift in national planning policy. The National Trust supports this approach and would welcome opportunities to help connect new developments to our sites through sustainable new connections and transport modes.

## Habitats Regulations Assessment (2025)

In 2025 the National Trust commissioned external consultants Footprint Ecology to undertake surveys at Wicken Fen and prepare a 'Visitor Survey and Recreation Impacts Assessment Report'. This report is currently in draft but nearing completion. This is an update to the previous survey work and report from 2019.

The report notes that access and footpath management at Wicken Fen, currently appear to be largely effective at minimising impacts. The visitor data identifies a Zone of Influence (ZOI) of 10.7km for Wicken Fen. This is determined using the 75<sup>th</sup> percentile for distances between the home postcode of visitors and interview location (a standard and recognised method) and where change might be expected to result in increased recreation use. This is a slight increase from the 10.3km ZOI which was determined in 2019, and used to inform the Council's Habitats Regulations Assessment (HRA).

Waterbeach, Cambridge East and North East Cambridge could potentially cumulatively deliver nearly 30,000 new homes within or adjacent to the Zone of Influence. There is also the potential for windfall developments. Whilst on-site greenspace will be delivered within the strategic sites, Wicken Fen is a unique site which draws people with particular interests and could not be replicated elsewhere. We consider that there will still be an uplift in visitors as a result in the housing growth around the eastern side of Cambridge. Wicken Fen has capacity to accommodate more visitors, but only by implementing appropriately located and well-designed new infrastructure to minimise recreational pressure on the sensitive and designated parts of the site. The Trust has recently commissioned a Spatial Plan to assist with the future development of the site.

With regards to Recreational Pressure, Section 6 of the Council's HRA states that the Appropriate Assessment concluded no adverse effect on integrity as a result of increased recreational pressure in relation to Wicken Fen Ramsar site, Fenland SAC and Eversden and Wimpole Woods SAC provided that the following safeguards and mitigation measures are required by the plan and successfully implemented. This includes:

- A commitment in the plan to ensure that any development within 10.3 kilometres of Wicken Fen Ramsar site and Fenland SAC and within 5 kilometres of Eversden and Wimpole Woods SAC will include the provision of alternative natural greenspace, specifically designed and managed to alleviate visitor pressure on these Habitats sites.

However, this commitment has not been explicitly included in the draft Local Plan. The wording of policy BG/BG should be amended to include the wording and updated Zone of Influence:

*"Any development within 10.7 kilometres of Wicken Fen Ramsar site and Fenland SAC and within 5 kilometres of Eversden and Wimpole Woods SAC will include the provision of alternative natural greenspace, specifically designed and managed to alleviate visitor pressure on these Habitats sites".*

Subject to this amendment, we agree that this mitigation would help to reduce recreational pressure on parts of the Wicken Fen Ramsar site and Fenland SAC and help protect the Eversden and Wimpole Woods SAC in order not to give rise to an adverse effect on the integrity of these designated sites.

The Habitats Regulations Screening Assessment identifies potential water quality and water quantity as likely significant effects (LSE) on Wicken Fen Ramsar and Fenland SAC (Table 4.8). Wicken Fen Ramsar is one of Europe's most important wetlands supporting fen habitat and is one of the few fens that has not been drained. Natural England has previously explained that there are indications that the water present within this Habitats site is fed by groundwater. Due to the location of the site and chemistry of the water, it is expected that the site lies outside of the influence of the Cambridge chalk aquifer. However, given the reliance of the qualifying habitats and species on water, a precautionary approach has been applied, and Wicken Fen Ramsar has therefore been screened in for further assessment in relation to changes in water demand and treatment<sup>5</sup>. We agree with this approach and will review the further assessments in due course.

## **Summary**

The National Trust is grateful for the opportunity to comment on the draft Local Plan and is supportive of plan-led growth. The Trust is keen to work with the local authorities to protect our land from damage from recreational pressure over the plan period and to deliver new opportunities for people to access beauty, nature and heritage.

Should you wish to discuss any of the above please do not hesitate to contact me.

Yours faithfully

Nina Crabb MRTPI

Nina Crabb  
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National Trust, Midlands and East of England

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<sup>5</sup> HRA of Greater Cambs Local Plan para 4.113