

Date: 30 January 2026
Our ref: 535205
Your ref: Draft Greater Cambridge Local Plan Consultation



Greater Cambridge Local Plan team

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BY EMAIL ONLY

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Dear Greater Cambridge Local Plan team

Draft Greater Cambridge Local Plan Consultation December 2025 - January 2026

Thank you for your consultation on the above dated 01 December 2025 which was received by Natural England on the same date.

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.

Please note that we have only provided comments on those aspects of the Local Plan relevant to key matters within our natural environment remit, particularly the protection and enhancement of nationally and internationally designated wildlife and geological sites including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs).

Our response to the Habitats Regulations Assessment (HRA) is also included within the Supporting Documents section at the end of this letter.

We hope you will find the below comments helpful. For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk.

Yours sincerely,

Natural England West Anglia Team

Draft Greater Cambridge Local Plan 2045 (Dec 2025 – Jan 2026)

Development Strategy

Natural England welcomes the strategic priorities of the Local Plan, and are pleased to note that the Vision for Greater Cambridge, includes the aspiration for a big decrease in climate and environmental impacts, and increase in the network of nature, wildlife and multi-functional green spaces.

Site Allocations

Cambridge urban area

Policy S/NEC: North East Cambridge

We welcome the requirement in part 11 for the delivery of an exemplary green and blue infrastructure network, and agree that joining with the accessible strategic networks outside of the North East Cambridge Area will be needed to allow residents easier access to sufficient greenspace. We recommend considering the provision of a new country park within walking distance of this area.

Edge of Cambridge

Policy S/CE: Cambridge East

We note that the policy requires provision of a country park beyond the site to connect through to the Wicken Fen Vision area, and encourage your authority to engage as soon as possible with the National Trust about this.

Policy S/NWC: Eddington, Cambridge

Please see our comments on the Habitats Regulations Assessment (HRA), at the end of this letter, which relate to this site.

Policy S/WC: West Cambridge

Please see our comments on the HRA, at the end of this letter, which relate to this site.

New Settlements

We note that some of these allocations include 'non-development' buffer areas (Strategic Enhancement Areas / SEA), particularly where SSSIs and other sensitive habitats are within or adjoining the sites. Whilst we welcome this, we also wish to make you aware of the case of Uttlesford District Council (UDC), who took a similar approach, but were directed by the PINS inspector to merge the development and non-development areas into one red line boundary for increased flexibility in masterplanning, in order to overcome constraints. Whilst this may not happen here, it would be prudent to be prepared, and we advise that a minimum buffer area adjacent to SSSIs should be decided upon in case the quantum of Green Infrastructure provision eventually becomes fragmented into smaller parcels across the wider red line boundary. We would be happy to provide more information and discuss this further with your authority in our ongoing meetings.

Policy S/CBN: Cambourne North

As you are aware, this allocation surrounds and is adjacent to a number of SSSIs and ancient woodlands, and concerns currently remain about how impacts to these sites will be avoided. We do however welcome the positive approach taken to shaping and planning this new settlement so far, and we will continue to work with you as you develop and refine the policies around this allocation.

We note that part 22 of this policy specifies that the development must ensure that ancient woodlands and SSSIs are kept free from public access and that measures that minimise ecological pressures from domestic animals must be identified and delivered. Whilst we agree with this in principle, we have questions about how these points will be achieved in practice. There should be a requirement to monitor the effectiveness of measures put in

place and a commitment to implementing alternative solutions if the initial measures are ineffective.

The range of other Nature points included within this policy are however commended, and parts 23 to 26 of the policy are particularly praised by Natural England for the detailed consideration that your authority have given to incorporating dark corridors into the new settlement. This will be especially important for avoiding and mitigating potential impacts to bats associated with Eversden and Wimpole Woods SAC, but will equally be of benefit to many other species.

We note that part 32 refers specifically to the provision of Suitable Alternative Natural Greenspace (SANG). We advise that this term has a specific definition and set of criteria associated with it, including the requirement for 8ha/1000 new population of accessible semi-natural greenspace, discounting for noises, smells, narrow corridors etc. Currently the Cambourne Green and Blue Infrastructure (GBI) Framework (page 25) mentions an overall metric of 3ha/1000 new pop of accessible greenspace, but of this, only 1.6ha/1000 new population will be semi-natural Green Infrastructure (GI), i.e. SANG-type semi-natural GI that would provide a realistic alternative to recreating within the SSSIs. The Cambourne GBI Framework currently proposes 60ha of semi-natural greenspace, but to meet 3ha/1000, 93.6ha would be required. Therefore, to meet the official SANG standard of 8ha/1000, 249.6ha semi-natural greenspace would be required. We advise that 3ha/1000 greenspace which meets the Natural England GI Framework Standards criteria should be an absolute minimum, particularly where mitigation for recreational pressure is needed, and that more should ideally be required. We do recommend however, that your authority carefully considers whether to use the very prescriptive term 'SANG', or whether an alternative Green Infrastructure phrase should instead be used to allow for a more bespoke approach. You could use 'SANG-like' if these principles are still aspired to but not necessary to meet in full. We will be happy to work with you on this, to identify something that will be effective, deliverable and compatible with your own GI standards.

Part 33 of this policy is also supported, although we advise that ecological survey and monitoring should also be added as a requirement for specific sensitive locations outside of the site's red line boundary that may be impacted by the development. This would help to inform the requirements of part 22, and the suggestions mentioned above relating to this.

Please also see Policy WS/HS for an additional point relating to Cambourne North.

Policy S/CB: Cambourne

We would encourage your authority to add wording to the Nature sections of this policy about sensitive lighting strategies and providing dark habitats/corridors where possible, particularly if these can link with those planned in Policy S/CBN, and around the outer edge of the settlement.

Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

This site is directly adjacent to Roman Road SSSI and although we welcome the inclusion of the Strategic Enhancement Area (SEA) to buffer this protected site from development, concerns currently remain about how impacts will be avoided. We will be happy to have discussions with you about this.

We note that an amount of greenspace has not yet been specified. We advise that 3ha/1000 greenspace which meets the Natural England GI Framework Standards criteria should be an absolute minimum, particularly where mitigation for recreational pressure is needed, and that more should ideally be required. For a site of 6000 homes, a minimum of 43.2ha semi-natural greenspace would be needed. Please also note our above point, under 'New Settlements' about agreeing minimum buffer distances from the SSSI.

As recommended for policy S/CBN, we advise that ecological survey and monitoring should also be added as a requirement for specific sensitive locations outside of the site's red line

boundary that may be impacted by the development. There should be a requirement to monitor the effectiveness of measures put in place to combat recreational disturbance on the SSSI, for example, and a commitment to implementing alternative solutions if the initial measures are ineffective.

Existing New Settlements

Policy S/BA: Bourn Airfield New Village

As with Policy S/CB, we would encourage your authority to add wording to the Nature section of this policy about sensitive lighting strategies and providing dark habitats/corridors where possible, particularly if these can link with those planned in Policy S/CBN, and around the outer edge of the settlement.

Climate Change

Policy CC/WE: Water efficiency in new developments

We welcome the inclusion of water efficiency measures within Local Plan Policy, particularly the requirement for development of 100 or more dwellings to achieve water usage of no more than 80 litres/person/day.

The [Greater Cambridge Local Plan: Climate Change Topic Paper \(2025\)](#) covers the reasoning behind the policy decisions, and refers to the significant work that has been carried out around water efficiency. It also explains, in paragraph 6.39, why the 85 litres/person/day recommended by the [Shared Standards in Water Efficiency for Local Plans \(2025\)](#) has not currently been included for developments of less than 100 homes.

Policy CC/IW: Integrated water management, sustainable drainage and water quality

This policy is welcomed, particularly the requirements around Water quality, which will be necessary to avoid impacts to various protected sites including the Ouse Washes.

The part 1d requirement for water management to be '*designed in such a way that makes use of nature-based solutions wherever practicable*' is also strongly supported.

Policy CC/RE: Renewable energy projects and infrastructure

We advise that you consider adding wording clarifying your authority's position on potential solar proposals on peat soils.

This is an area that is still being researched, and it is unclear how compatible solar farms are with the protection and enhancement of peat soils as carbon sinks. We also have concerns about the significant fire hazard posed by solar farm infrastructure on peat soils, particularly as fires can burn underground for long time periods and spread undetected through peat, making them incredibly difficult to extinguish if not found straight away, posing considerable risks to both wildlife and people (see [The Danger of Peatland Fires | The Great Fen](#)).

We would suggest that if a solar proposal is found to be on peat-based land, that it should only be approved if it is part of a well-researched and appropriately designed wider scheme to protect or enhance the carbon sink of such land, and includes strong fire prevention and rapid response extinguishment systems.

Please see Appendix 1 for additional comments relating to peat soils.

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

The general principles of this policy are welcomed, however, Natural England does not support part 2a of Policy CC/CS which allows sites to be allocated on peat soil, or for those allocations which are later discovered to be on peat to proceed.

Part 4 refers to the removal of peat soils. We advise strengthening this, along the lines of 'If there

are any exceptional proposals allowed by the LPA to remove peat soils, this must only be done with the guidance and supervision of a suitably qualified and experienced soil scientist / practitioner, to an approved plan. The peat must be appropriately stored and then eventually used, all in a way that would limit carbon emissions into the atmosphere as far as possible.'

We also note that part 4 refers to the DEFRA Code of Practice for the Sustainable Use of Soils on Construction Sites (2009), however, the current (2009) version does not mention peat, which requires specialist handling techniques. The following from the Broads Authority may be of assistance: [Guide to understanding and addressing the impact of new developments on peat soil](#)

We also advise that it should be made clear that tree planting on areas of peat is not normally appropriate as this contributes to the drying and wasting of peat, therefore releasing carbon rather than storing it as intended.

Please see Appendix 1 for additional comments relating to peat soils.

Biodiversity and green spaces

Policy BG/BG: Biodiversity and geodiversity

Natural England welcomes this policy. We would however like to have further discussions with you about part 9 in particular, to agree on a suitable approach to the recreational pressure issue. See Policy BG/GI and Policy S/CBN for further related comment.

Important Invertebrate Area (IIA)

Additionally, we would like to flag the Buglife mapping of [Important Invertebrate Areas](#) (IIA) as these support some of Britain's rarest species and possess unique assemblages of invertebrates. There is currently a small section of IIA mapped within South Cambridgeshire, associated with the Fens IIA. For any proposals in or near to an IIA, we recommend that site design (especially any on-site BNG, Green Infrastructure or SuDS) and ongoing management (i.e. Landscape Environmental Management Plan) should aim to protect and enhance habitat features for invertebrates.

[Buglife](#) has produced a [general guidance note](#) on practical measures to achieve this and is developing site-specific [profiles](#). Please contact info@buglife.org.uk for more information.

Solar panels adjacent to running water can also attract aquatic invertebrates with reflected polarised light appearing as suitable egg laying sites. We therefore recommend that solar proposals in these locations should follow the advice in the Fens IIA [profile](#) (page 12) that patterned, roughened or painted glass, or a horizontal light-blocking grid can be used to reduce the attraction of solar panels to aquatic invertebrates.

Policy BG/GI: Green and blue infrastructure

We welcome the recognition given to Green and Blue Infrastructure (GBI) within the Local Plan, noting the many benefits that a high-quality, multifunctional GBI network can have for people and nature in Greater Cambridge. Policy BG/GI reflects the principles set out in Natural England's Green Infrastructure (GI) Framework, and we support their inclusion here. Green and Blue Infrastructure designed in line with these principles can have cross-cutting benefits across many policy areas (e.g. climate, health and wellbeing, LNRS). It can also make a significant contribution towards the overall vision of the Plan (sustainable development).

We welcome the work to integrate the GI Framework and Standards into the Greater Cambridge Local Plan. We haven't provided detailed comments in this response (given ongoing discussions) but will continue to work with you as you develop and refine the approach for Cambridge.

The Plan's major allocations bring opportunities to secure high quality greenspace for Cambridge and deliver GBI in an exemplary way. We therefore support the need for major developments to provide a GI plan (para 5.35) and to integrate GBI early in the design process (Policy BG/GI point 2). This aligns with our GI Strategy Standard and reflects best practice. The 14 strategic projects identified in the Plan will further help to enhance the GI network and may link in with other nature

recovery aims (e.g. LNRS priorities).

The Plan should ensure that sufficient accessible greenspace is provided alongside development. This is particularly important where housing is located close to sensitive sites at risk of recreational pressure (e.g. SSSIs). The ongoing work to define Accessible Greenspace Standards for Cambridge will help to guide this. Development close to protected sites will also need to consider the design of greenspace. For example, a development close to a SSSI may need to consider a higher quantum of a semi-natural typology and ensure there is a sufficient buffer to the protected site. The delivery of GI should also be front-loaded and appropriately phased so that it has chance to establish prior to occupation, in order to function as mitigation. Please also see our comments under 'New Settlements' and our response to Policy S/CBN for more on this topic. We would be happy to provide further advice / attend a meeting to discuss the mitigation of recreational pressure for developments in Cambridge if this is helpful.

We would advise that Policy BG/GI is supported by a design code / guidance outlining good practice in the design and management of GBI. This would help to ensure that GBI delivers maximum benefits for Cambridge – for example by informing the delivery of the UGF and securing high quality urban greening.

Nature Towns and Cities:

We welcome the work of the LPA to create / enhance green and nature-rich spaces for the benefit of communities across Greater Cambridge. As discussed at our recent meeting, we are happy to provide you with support in pursuing a Nature Towns and Cities Accreditation, if you take this forward.

Policy BG/TC: Improving tree canopy cover and the tree population

This policy is welcomed by Natural England.

Policy BG/RC: River corridors

We welcome this Policy and the reference to the Local Nature Recovery Strategy (LNRS) for additional guidance.

Policy BG/PO: Protecting open spaces

We support this policy and the reference to Natural England's Accessible Greenspace Accessibility Standards to guide the location of replacement open spaces.

We also agree with the requirement for the replacement site to be '*fully available for use before the area of open space to be lost can be redeveloped*'. We advise that this requirement should apply to any open space to meet the recreation needs of a population, whether it is replacing a lost amenity or not.

Policy BG/EO: Providing and enhancing open spaces

Natural England will be happy to continue to support your authority in developing this policy, particularly in relation to deciding appropriate Accessible Green Space quantity standards. This will be key to addressing recreational pressure issues, and we welcome that you are exploring the potential to '*secure provision and/or contributions specifically for large scale green spaces including country parks*'.

Wellbeing and social inclusion

Policy WS/HS: Pollution, health and safety

We advise that your authority should include wording within this Policy about assessing environmental impacts, particularly in relation to Air Pollution. Your authority should follow Natural England's new Air Quality standard advice for guidance on this matter (see Appendix 2).

Additionally, the Cambourne Green and Blue Infrastructure document (page 13) refers to a buffer of 100m between Woodlands and Major Roads. Please note however that Habitats Sites and SSSIs

(and woodland) at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification. The HRA includes an assessment of air pollution in relation to Habitats Sites (using a 200m buffer), but SSSIs should also be assessed by your authority as part of the Local Plan.

The Light Pollution section of this Policy could also specifically mention the Eversden and Wimpole Wood SAC Impact Risk Zone (IRZ) and have requirements specific to this area, for example to follow the Institute of Lighting Professionals [GN08 Bats and Artificial Lighting](#). The proposed requirements in Policy S/CBN parts 23 to 26 could also provide some useful wording. Please see our comments about the Habitats Regulations Assessment (HRA) below for more about the imminent changes to this IRZ.

Great places

[Policy GP/QP: Establishing high quality landscape and public realm](#)

We welcome this policy, particularly part 1c, which recognises the many benefits of incorporating natural elements into development to respond to climate change.

Jobs

[Policy J/AL: Protecting the best agricultural land](#)

The [25 Year Environment Plan](#) (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on [natural capital](#), including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

We advise adding to this Policy the requirement for detailed Agricultural Land Classification (ALC) surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would also be welcomed.

To assist in understanding agricultural land quality within the plan area and to safeguard Best and Most Versatile (BMV) agricultural land in line with the NPPF, strategic scale ALC Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally by contacting Natural England. Some of this data is also available on the [magic](#) website. Your authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable or sufficiently detailed information is available, it would be reasonable to expect developers to commission a new ALC survey, for any sites they wish to put forward for development.

General mapped information on soil types is available as 'Soilscapes' on the [magic](#) website. Additional information regarding obtaining soil data can be found on the [LandIS](#).

A requirement for soil handling and sustainable soil management strategies is also advised. This should be based on a detailed assessment of the soil resource following best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning. This would help to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would also be welcomed. Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through provision of suitable soil handling and management advice. The planning authority should ensure that sufficient site-specific soil survey data is available to inform decision making. To include, for example, assessment of suitability of soil properties for type of landscaping and planting

proposed to inform beneficial re-use, appropriate soil management, and drainage, where required.

Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.

Infrastructure

[Policy I/ID: Infrastructure and delivery](#)

We agree that *'new development must be co-ordinated and phased in tandem with the provision of appropriate physical and social infrastructure'*, and, in the case of accessible greenspace provision, this is particularly important where housing is located close to sensitive sites at risk of recreational pressure (e.g. SSSIs). See our response to Policy BG/GI: Green and blue infrastructure for additional comments.

Supporting Documents

[Habitats Regulations Assessment](#)

We advise that the Habitats Regulations Assessment (HRA) and Appropriate Assessment (AA) should assess water quality impacts to protected sites in greater detail (4.117 onwards), and consider protected sites on an individual basis (as has been done for water quantity at 4.110 onwards). The impacts to sites will vary based on their current condition and capacity to cope with changes. We acknowledge that the HRA necessarily has to be at a fairly high level, but it still needs to be robust. Our main concerns are in relation to Portholme SAC and the Ouse Washes.

Additionally, from 5.71 onwards, we advise that the HRA requires more detail and separation of water pollution impacts to the Upper Ouse catchment and the Cam and Ely Ouse catchment. Development that depends on a Sewage Treatment Works that drains into the Upper Ouse catchment will affect the Ouse Washes, which is currently failing its water quality targets.

The HRA references the Stantec report ([Greater Cambridge Integrated Water Management Study \(IWMS\) from Stantec](#)) but it is not clear which Sewage Treatment Works / Water Recycling Centres (StW / WRC) are in scope here. For example, Utton's Drove StW effluent drains into the Ouse and so will flow into the Ouse Washes. Uttons Drove WRC serves significant growth areas including Cambourne and Northstowe and currently has considerable issues, according to the IWMS.

We do however broadly agree with the conclusion (5.77) that *'it will be necessary for GCSP to continue to engage with Anglian Water and ideally reach a statement of common ground prior to submission of the Local Plan to gain certainty that the necessary WWTW upgrades will be achieved'*.

The Non-Toxic Contamination (which can contribute to nutrient enrichment) (4.41 onwards), and Direct pollution / run-off section of the HRA (4.123) both use '500m from a Habitats site' as the screening distance. We do not agree with this methodology, and strongly recommend that the screening is reviewed with the criteria '500m from any waterway that is hydrologically connected to a Habitats site'. This may bring some sites into consideration, particularly in relation to Portholme SAC and the Ouse Washes which are already suffering from pollution and nutrient issues.

Also, regarding Functionally Linked Habitat (FLL) (4.18 onwards and 4.29 onwards) for the Ouse Washes SPA/Ramsar, this site is designated for swans which have a 10km IRZ so a 2km buffer screening limit is insufficient.

We agree that Eversden and Wimpole Woods SAC should be included in the AA, particularly in relation to 'Physical Damage and Loss of Habitat – Functionally Linked Habitat' and 'Non-Physical Disturbance – Functionally Linked Habitat'. We note however that a 10km screening distance has currently been used (pages 32, 36). As mentioned in our recent discussions, Natural England's Impact Risk Zone (IRZ) for this SAC is about to be updated to a 6km core sustenance zone (CSZ) and a 10.2km landscape connectivity zone (LCZ) for barbastelle bats. We will share the final IRZ wording with you, once it has been confirmed for the next IRZ update, and will arrange further discussions about this with the Natural Environment team shortly. The HRA should be updated to reflect this change, and we advise that additional larger sites within this distance would be West Cambridge ([S/WC](#)) and Eddington ([S/ED](#)). The small site Cambridge Professional Development Centre, Foster Road ([S/C/PDC](#) ; [S/LAC: Other site allocations in Cambridge](#)) would also be within the 10.2km zone, but we expect this will not meet the IRZ criteria as it is within an existing urban area and should not impact barbastelle commuting and foraging habitat.

We are aware that the National Trust have recently commissioned a recreational impact assessment to update the Zone of Influence for Wicken Fen Ramsar and Fenland SAC and encourage your authority to engage as soon as possible with the National Trust about this. This may mean that the Local Plan HRA will need to be amended should there be an alteration from the 10.3km zone currently used, and the findings should inform the LPA's Appropriate Assessment.

Please also see Natural England's new Standard Advice for Air Quality Impacts for Local Plans in Appendix 2 of this letter.

Appendix 1: Additional advice regarding potential peat soils

If development proposals come forward in locations in the north of Cambridgeshire, between Over and Waterbeach, Natural England's [high-level indicative mapping](#) should be checked to establish whether the proposal is in an area of potential deep peat. If so, we advise that Agricultural Land Classification (ALC) surveys are undertaken to verify the actual soil conditions in potential areas of peat, as these maps are not at a scale suitable for accurate assessment of individual fields or sites.

We recommend that the Applicant's soil surveys of the proposal area should follow standard methodology ([Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land - JP069](#)) **and be carried out by a suitably qualified and experienced soil scientist or practitioner** (see <https://soils.org.uk/find-an-expert/>). As part of those ALC surveys they should accurately map the peat presence and depth across the site, to at least 80cm.

Our advice is to **avoid development on anything classed as Peat Soil**, following the definition used by the Soil Survey Classification (England) as set out in Avery (1980)¹, Hodgson, (2022)², and NE TIN037 <https://publications.naturalengland.org.uk/publication/32016>. This is the same definition as is used in the ALC system, and is widely used on soil maps such as the England Peat Map. A summary of the definition is that all peaty soil textures³ (greater than 20-25% Soil Organic Matter (SOM), which varies according to clay content) fall within the Soil Survey Classification definition; however to be a Peat Soil (for soil classification and mapping purposes) there are some depth cut-offs: i) more than 40cm in the top 80cm should be peaty textured (usually the top 40cm, but can include buried peaty layers) and ii) organic (6-20% SOM) or peaty (>20% SOM) textures are present within the top 30cm. Avery (1980) also indicates that shallow peat soils (at least 30 cm) over rock or extremely stony material can also fit the definition of peat soils. This definition recognises the variability that can exist within some 'peat' landscapes, particularly in drained lowland situations.

Natural England would not normally wish to review the ALC survey. We would instead leave it to your Authority to follow our above advice and decide whether the applicant provides sufficient evidence to inform your decisions. Note that **an archaeological assessment is not sufficient evidence**, unless the assessor is also a suitably qualified and experienced soil scientist or practitioner (see <https://soils.org.uk/find-an-expert/>).

If 'pockets' of peat are located within a larger non-peat site, these should be utilised for Green Infrastructure wherever possible.

We would also have concerns about any proposals which may pose a fire hazard that are on or near peat soils. This is because fires can burn underground for long time periods and spread undetected through peat, making them incredibly difficult to extinguish if not found straight away, posing considerable risks to both wildlife and people (see [The Danger of Peatland Fires | The Great Fen](#)).

¹ Avery B W (1980) Soil Classification for England and Wales (Higher Categories), Soil Survey Technical Monograph 14, Harpenden

² Hodgson J M (2022) Soil Survey Field Handbook 4th Edn , Technical Monograph 5, Cranfield

³ Peaty soil texture - This is a texture group comprising peat, loamy peat, sandy peat, peaty loam and peaty sand textures. They are often difficult to identify separately as all are dark coloured and especially where well humified can be difficult to distinguish by eye or hand texture.

Appendix 2: Standard Advice for Air Quality Impacts for Local Plans

Local Plans are likely to generate increased emissions of nitrogen oxides (NO_x) and ammonia, and additional nitrogen deposition as a result of increased traffic generation associated with new development. As impacts from individual development management proposals would be difficult to quantify without an overarching assessment of the cumulative impacts from Local Plan development, it is necessary for this to be considered strategically at plan level. Natural England would expect the environmental assessment of the plan including the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) to consider any detrimental impacts on the natural environment from these emissions. It should also suggest appropriate avoidance or mitigation measures where applicable. Technical guidance about the ecological impacts from road transport can also be found in the [Natural England research report 'The ecological effects of air pollution from road transport: an updated review' \(NECR199\)](#).

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites.

Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

Habitats Sites and SSSIs at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification.

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should also be taken as Natural England's formal representation under the Town & Country Planning (Local Planning) Regulations 2012. This standard advice is applicable to all stages of the Local Plan process. This includes advice on information that is required to assess air quality and how to interpret the results of air quality modelling for your LPA to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. Detailed guidance on how to undertake a Habitats Regulations Assessment for air pollution impacts generated from traffic can be found here [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations \(NEA001\)](#).

You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants:

- ammonia (NH₃)
- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here:

<https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover Local Plans, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken by local planning authorities.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
<p>Initial screening for credible risk of an effect</p>	<p>1</p> <p>Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required</p>	<p>The Air Pollution Information System (APIS) includes an introduction to air pollution.</p> <p>APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features.</p> <p>For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered.</p> <p>Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.</p>
	<p>2</p> <p>Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required</p> <p>APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/srcl</p> <p>Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.</p>	<p>The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View, alongside Conservation Objectives and Supplementary Advice for Habitats Sites.</p> <p>The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads).</p> <p>If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.</p>
<p>Detailed AQ modelling</p>	<p>3</p> <p>Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) - Roads</p> <p>Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.</p>	<p>Air Quality modelling for Local Plans should include relevant scenarios that are clearly identified. We advise an allowance is also made for windfall development.</p> <p>One such example of scenarios is a baseline plus future forecasts as follows: Baseline, future baseline (at end of plan period taking into account background trends for each pollutant), do nothing (without plan), do something (with plan).</p> <p>The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf</p>
<p>Applying screening thresholds</p>	<p>4a</p> <p>Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5</p>	<p>Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>.</p>

			<p>If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.</p>
	4b	<p>Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5</p>	<p>Use information from competent authorities (Planning Portal or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination for emission from roads/ increase in traffic. For example, add emissions & deposition from other Local Plans together and apply 1% to that sum. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.</p>
Detailed Assessment of ecological impacts	5	<p>This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures.</p> <p>If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this.</p> <p>For SSSIs, this step should provide all the information necessary, including any required mitigation, for the LPA to determine if there would be an adverse effect on a SSSI. Should an adverse effect not be ruled out, this will need consideration within the Local Plan Sustainability Appraisal and consideration of the tests of the NPPF (para 193b).</p> <p>If Habitats Sites are impacted by the proposals, move to Step 6.</p>	<p>The following information is likely to be helpful for the LPA:</p> <p>Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there?</p> <p>Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not.</p> <p>Assess likely scale and duration of impacts on habitats from emissions.</p> <p>Check whether any strategic initiatives in the area (such as shared nitrogen action plans) would be compromised by the proposals.</p>
Appropriate Assessment (AA) for habitats sites	6	<p>LPA to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed by the applicant should also be assessed at this point.</p> <p>Should the AA conclude that the Local Plan would have an AEOI that cannot be excluded with mitigation measures, consider derogation route of the HRA process.</p> <p>Should compensation measures be required under derogation, please contact Natural England for specific advice.</p>	<p>Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the plan. To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence.</p> <p>When deciding on whether the proposals set out in the plan will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.</p>

	<p>Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects</p>	
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Additional advice

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. the main source of background exceedance is due to agriculture, but the proposal is a road scheme). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to ‘maintain or restore’ air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

Where an air quality report concludes that only a very small area of the site will be impacted, the assessment of effects on integrity or damage to the site, should take into account the interest features of the site, their distribution and how they will be impacted by proposals rather than on specific percentages of site. Dependent on features being present in the area to be impacted, this could have a disproportionate impact on the site if an area of a rare habitat type were lost rather than a judgement just on the percentages of habitat.

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and Nitrogen Oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Common Standards Monitoring^[1] is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that Local Plans should be using (which we advise should also consider ammonia emissions as well as NOx – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment.

We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided. The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the local plan.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with the conclusions of your HRA in relation to air quality impacts and that the Local Plan is sound in this regard.

Local plan policy Advice:

Natural England would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on protected sites. If the Local Plan would result in other air quality impacts apart from traffic, then this will also need to be addressed.

Local authorities should consider including a local plan policy based on the suggestion below to address air pollution impacts on Habitat Sites and SSSIs. The local plan policy could include the following:

- 1. Proposals should not significantly delay the date for compliance with environmental thresholds for air pollutants for Habitats Sites or SSSIs that are currently in exceedance of environmental benchmarks (critical levels and loads).*
- 2. Proposals emitting air pollutants which impact Habitats Sites must rule out adverse effects on the integrity of such sites. Where this is not possible the derogations route of the Habitats Regulations should be followed.*
- 3. To avoid and minimise air pollution impacts any development requiring Habitats Regulations Assessment, Environmental Impact Assessment (EIA) or impacts to SSSIs unrelated to EIA development should consider:*
 - the measures included which will minimise air pollution impacts on SSSIs and Habitats Sites and SSSIs during the design process of the development; and*
 - how air quality improvements have informed the design choices made about the location of the development, its layout, and distribution of buildings, on-site activities, amenity spaces and infrastructure.*

A local plan could go on to set out what would be required for different development types in more detail. This may be important where there is strong evidence that particular sources of air pollution are preventing nature recovery. For example, where agricultural development is known to be one of the main sources of air pollution, a policy could specify a buffer around a protected site within which new or intensified agricultural proposals would not be permitted, apart from in exceptional circumstances.^[2]

^[1] [Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation](#)

^[2] Joint Nature Conservation Committee's (JNCC) Nitrogen Futures Project, available at: <https://jncc.gov.uk/our-work/nitrogen-futures/>