Greater Cambridge Local Plan – Regulation 19 Representation

Respondent: Haslingfield Parish Council
Policy: Habitats Regulations Assessment
Position: Object

HPC has drawn substantially on the evidence and analysis prepared by Cambridge Approaches because Cambridge Approaches has undertaken detailed research into the ecological evidence underpinning the Local Plan's Habitats Regulations Assessment, including East West Rail Company's barbastelle radio-tracking evidence. HPC considers that this research provides relevant specialist expertise and documentary evidence that should be taken into account in examining the Plan. HPC agrees with the substantive concerns expressed in the relevant parts of Cambridge Approaches' representation and has therefore adopted much of its analysis.

This representation is separate from, and additional to, HPC's representation on the Habitats Regulations Assessment's treatment of East West Rail. The two representations should therefore be read together, but each raises an independent concern regarding the robustness of the HRA.

1. The SAC's barbastelle population is not confined to Eversden and Wimpole Woods

1.1 The Habitats Regulations Assessment treats Eversden and Wimpole Woods SAC as though it supports an isolated barbastelle population whose habitat requirements can be fully captured by a Core Sustenance Zone and Landscape Connectivity Zone drawn outward from the SAC boundary alone[1]. East West Rail Company's 2022 radio-tracking survey – obtained by Cambridge Approaches under the Freedom of Information Act and publicly available – establishes that this is not the ecological reality. That survey confirms separate barbastelle maternity colonies at Madingley Wood SSSI, Hardwick Wood SSSI and Waresley and Gransden Wood SSSI, and states in terms: '*The surveys did however indicate that foraging resources are shared by the Madingley Wood SSSI, Hardwick Wood and Eversden and Wimpole Woods SAC barbastelle maternity colonies*.'[2] The SAC's qualifying population therefore depends, for its foraging resource, on land beyond what the HRA's own methodology treats as relevant.

1.2 This matters because Hardwick Wood lies close to, and shares a foraging landscape with, several of the Local Plan's own site allocations and policy areas in this part of South Cambridgeshire. A foraging resource used in common by more than one maternity colony may be particularly sensitive to incremental loss, because pressure on that resource is likely to affect more than one population, including the SAC population.

2. The Councils' evidence shows awareness of the Hardwick Wood connection, without it being carried into the assessment

2.1 Appendix E to the HRA, in its site-level review of Policy S/SEA/BA (the Strategic Enhancement Area adjoining Bourn Airfield New Village), records under 'Functional connectivity': "The hedgerows and woodland provide good connectivity to the wider area, such as Hardwick Wood to the southeast."[3] The

accompanying figure shows commuting-corridor lines running toward Hardwick Wood. Hardwick Wood is therefore already present in the Councils' evidence base as a site with functional connectivity to the assessed area – but nowhere does the HRA identify Hardwick Wood as itself supporting a barbastelle maternity colony or ask whether development affecting that connectivity could affect a foraging resource shared with the SAC.

2.2 The Appendix E entry for S/SEA/BA appears, on the face of it, to describe the functional connectivity of the site being assessed rather than the SAC's connectivity requirements – the two are conflated in a way that risks the significance of the Hardwick Wood link being lost from the assessment altogether. HPC does not suggest this was anything other than an oversight, but it is one with real consequences: it means the Councils had, in their evidence base, a documented link to Hardwick Wood, and did not follow that link through to the maternity roost and shared foraging resource that East West Rail Company's survey had already identified by the time the Regulation 19 HRA was prepared.

3. East West Rail Company's public facing material illustrates the population's significance, without disclosing it

3.1 East West Rail Company's 2026 consultation brochure includes the following, in relation to a proposed bridge near Hardwick Road: '*This bridge would include a planted section to provide habitat connectivity for mammals, including barbastelle bats. It would allow wildlife to move between Hardwick Wood Site of Special Scientific Interest, ancient woodland, and foraging habitat to the east*.' [4] This passage describes mitigation for a generic connectivity concern. It does not disclose that Hardwick Wood supports a confirmed barbastelle maternity colony, or that this is what the mitigation is actually there to protect. The consultation brochure does not identify Hardwick Wood as supporting a confirmed barbastelle maternity colony, nor does it explain that the connectivity referred to relates to habitat used by a population sharing foraging resources with the SAC population.

3.2 HPC raises this not as a criticism of the Local Plan's HRA directly – East West Rail Company is a separate body with its own consultation obligations – but because it illustrates the point made in Section 1 above: the ecological significance of this part of the landscape is established and known, from the promoter's survey work, and has not found its way into the Greater Cambridge Local Plan's assessment.

4. Recreation and visitor pressure on the shared foraging resource is not assessed anywhere in the HRA

4.1 The HRA does contain a dedicated Appropriate Assessment of recreation pressure on Eversden and Wimpole Woods SAC, at paragraphs 5.63–5.68[1], concluding that adverse effects will be avoided through Policy BG/EO and the Bourn Airfield site policy's landscaping and open space requirements. HPC does not take issue with that assessment on its own terms.

4.2 What is absent is any assessment of recreation or visitor pressure on Hardwick Wood SSSI itself. This is not, in isolation, a gap in the HRA's legal scope: Hardwick Wood is not a European site, and the Habitats Regulations do not of themselves require it to be assessed as such. But given the shared foraging resource identified in Section 1 above, increased visitor pressure on Hardwick Wood – arising from the cumulative effect of the housing growth planned across this part of South Cambridgeshire, including but

not limited to the Bourn Airfield and Cambourne allocations – is capable of affecting habitat that the SAC's qualifying population also relies upon. HPC considers that this raises a functionally-linked-habitat issue which should be addressed in the assessment of effects on the SAC.

5. Wider context: Natural England has already identified suitable foraging resource in this area as scarce

5.1 Natural England's response to the 2018 First Proposals consultation on the Local Plan recorded: "Natural England is reviewing the Impact Risk Zone (IRZ) for Eversden and Wimpole Woods SAC to take into account the findings of emerging SAC barbastelle tracking surveys being undertaken for major development schemes. It will also take into consideration the availability of suitable foraging resource which is considered to be quite scarce in the local area."[5] HPC relies on this as context, not as a freestanding ground of objection: it supports treating the loss of any part of a shared foraging resource – including the resource shared with Hardwick Wood identified above – as significant, rather than assuming that a scarce resource can absorb incremental loss without cumulative consequence.

6. Public Domain Material which may assist GCSP's HRA

6.1 HPC draws attention to publicly available material obtained by Cambridge Approaches which may assist the Councils in reviewing the HRA, including the 2022 EWRCo. barbastelle radio-tracking survey and correspondence between EWRCo. and Natural England concerning Eversden and Wimpole Woods SAC. In particular, the evidence-plan material should be considered insofar as it identifies concerns regarding the quality or adequacy of the evidence available.

6.2 EWRCo.'s 2022 Barbastelle Radio-Tracking Survey Report[6] is key public domain material. This includes the following sections that are relevant to the Barbastelle Bats roosting in the Eversden and Wimpole Woods SAC: §§3.2.4-3.2.9, §§3.4.6-3.4.7, §4.2. §4.2.10 states '*The radio-tracking surveys undertaken in August and September 2022 did not therefore provide evidence that the breeding colonies at Madingley Wood SSSI, Hardwick Wood SSSI and Waresley and Gransden Wood SSSI directly interact with the Eversden and Wimpole Woods SAC barbastelle maternity colony with respect to the interchanging of roosting.* ***The surveys did however indicate that foraging resources are shared by the Hardwick Wood SSSI colony, Madingley Wood SSSI colony and the Eversden and Wimpole Woods SAC population***.'

6.3 The tracking report referred to above contains maps which were redacted from the version initially released. Cambridge Approaches subsequently obtained the maps and has indicated that they are available on request. HPC considers that these materials may assist the Councils in understanding the extent of the relevant foraging landscape.

Endnotes

1. Habitats Regulations Assessment of the Greater Cambridge Local Plan (LUC, Final report, July 2026): https://www.greatercambridgeplanning.org/media/3zdjqdus/habitats-regulations-assessment-of-greater-cambridge-local-plan.pdf

2. East West Rail Company, 2022 Barbastelle Radio-Tracking Survey Report (file 'EWR Ref TBC Radiotracking Report V1.5 12092023 redactapplied.pdf'), Executive Summary. Released under the Environmental Information Regulations 2004 in response to a Freedom of Information request by Dr Euan Dunn, 'Barbastelle Bat radio-tracking report, Eversden and Wimpole Woods SAC' (ref CS-00209621, requested 6 December 2024, released 5 February 2025): https://www.whatdotheyknow.com/request/barbastelle_bat_radio_tracking_r_3 .

3. Habitats Regulations Assessment of the Greater Cambridge Local Plan, Appendix E, site review of Policy S/SEA/BA: Bourn Airfield Strategic Enhancement Area, page 216, 'Functional connectivity'.

4. East West Rail Company, consultation brochure page 118: https://ewr-production-files.s3.eu-west-2.amazonaws.com/public/Uploads/e3c2df861d/EWR_Consultation-Brochure_18.08.26.pdf

5. Natural England, response to the Greater Cambridge Local Plan First Proposals consultation (2018), page 10: https://oc2.greatercambridgeplanning.org/download/attachment/1795373

6. EWRCo. 2022 Barbastelle Radio-Tracking Survey Report. https://www.whatdotheyknow.com/request/barbastelle_bat_radio_tracking_r_3/response/2906730/attach/html/3/EWR%20Ref%20TBC%20Radiotracking%20Report%20V1.5%2012092023%20redactapplied.pdf.html

7. Modifications sought

7.1 The HRA should be updated to identify Hardwick Wood's barbastelle maternity colony and its shared foraging resource with Eversden and Wimpole Woods SAC as part of the functionally-linked-habitat baseline for the SAC, drawing on East West Rail Company's 2022 radio-tracking survey and any further survey data available from East West Rail Company or the Cambridgeshire and Peterborough Environmental Records Centre.

7.2 The Appropriate Assessment should specifically consider whether recreation and visitor pressure arising from the Local Plan's allocations – individually and cumulatively – is capable of affecting the foraging resource shared between Hardwick Wood and the SAC, and whether the existing mitigation in Policy BG/BG and related policies is sufficient to address that pathway.

7.3 Appendix E's review of Policy S/SEA/BA should be revisited to distinguish clearly between the functional connectivity of the site being assessed and the connectivity and foraging requirements of the SAC's qualifying population, so that documented links of the kind identified in Section 2 above are not lost from the assessment.

8. Conclusion

8.1 For the reasons set out above, we object to the Proposed Submission Greater Cambridge Local Plan on the grounds that its Habitats Regulations Assessment does not properly identify or assess the barbastelle foraging resource shared between Hardwick Wood and Eversden and Wimpole Woods SAC, notwithstanding that this is established by evidence already available to the Councils, including Appendix E and East West Rail Company's 2022 radio-tracking survey. This representation is made in addition to, and independently of, HPC's separate representation on the HRA's treatment of East West Rail's in-combination effect on the SAC. We ask that the Planning Inspector be asked to consider this as a soundness matter requiring further work on the HRA before the Plan is adopted.