Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name	Catherine Duerden	
Organisation (where relevant)	Natural England	
Job Title (where relevant)	Senior Officer – Sustainable Development	
Address, including Post Code	Natural England Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ	
Telephone	0300 060 3900	
Email address	consultations@naturalengland.org.uk	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Sections identified in the representation text
Proposed Submission Policies Map	Sections identified in the representation text
Sustainability Appraisal	Sections identified in the representation text
Habitats Regulations Assessment	Sections identified in the representation text

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	Yes / No
Legally compliant	Yes
Sound	Yes

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Proposed Submission Greater Cambridge Local Plan

Summary
Natural England welcomes the Greater Cambridge Local Plan. We provide minor recommendations on several policies (with suggested wording changes shown in blue). We are pleased that the natural environment and green infrastructure have been well considered and integrated across the Plan.

Regarding the Habitats Regulations Assessment, wording about residual in-combination effects and mitigation for these should be included before we can agree with the conclusion of no adverse effect on integrity on Eversden and Wimpole Woods SAC. Additional consideration of water issues is also needed. We anticipate these HRA matters will be able to be resolved however and believe the Plan itself to be sound.

Suggested amendments

Site allocations

- Policy S/CBN: Cambourne North
  Suggested edit to S/CBN part **26**:
  Positively plan for and deliver a network of dark corridors to ensure nocturnal and crepuscular species can forage with minimum disturbance. The development must:
  a. Incorporate dark corridors as part of the masterplan for the site, ensuring they are a minimum of 60m in width. The dark corridors must link Knapwell Wood, Elsworth Wood and Papworth Wood as well as form part of a wider dark landscape network beyond the site to Overhall Grove, Hardwick Wood and the Eversden and Wimpole Woods SAC. There must be collaboration and joined up design between the Cambourne North masterplan, Strategic Enhancement Area (S/SEA/CBN), and neighbouring schemes and allocations, such as East West Rail, Cambourne (S/CB) and Bourn Airfield (S/BA), to ensure coherent ecological connectivity is achieved;

Justification:

The landscape around this allocation is of known importance to barbastelle bats (as summarised in the *Cambourne to Cambridge statement to inform Habitats Regulations Assessment* section 6) with potential functional links to the Eversden and Wimpole Woods SAC. It is therefore imperative that habitat and connectivity is maintained and enhanced for the resilience of the SAC population and its future generations.

- Policy S/BA: Bourn Airfield New Village

Suggested edits to S/BA part **17**:

Balance the need for sensitive ecological assets to be protected and enhanced, with the opportunities provided by the rural setting to promote access to the natural environment, by: […]

d. Through ~~Bat Surveys~~ desk study and surveys, determine the individual and cumulate impacts of development associated recreational pressures on nearby sensitive sites, such as Hardwick Wood SSSI, to identify and implement necessary mitigation measures;

e. Providing a Sensitive Lighting Strategy and dark habitats/corridors ~~where~~ wherever possible, ensuring links are made ~~linking~~ to those being delivered as part of Cambourne North (Policy S/CBN), and around the outer edge of the settlement. Habitat permeability for barbastelle bats, including commuting flightlines and foraging habitat, must be provided and maintained; and

f. Providing orchards in appropriate locations, managed for both community and ecological value, including some locally relevant and heritage fruit/nut tree varieties. ~~where their ecological value can be demonstrated.~~

Justification:

d. Bat surveys are not very relevant to the assessment of recreational pressures, so this may be a typing error. The term 'sensitive sites' is recommended, as the assessment of recreational pressures should consider vulnerable non-SSSI locations as well as designated Sites of Special Scientific Interest (SSSIs). We advise mentioning Hardwick Wood SSSI specifically as it is close to the proposed allocation and is already known to be impacted by recreation.

e. The landscape around this allocation is of known importance to barbastelle bats (as summarised in the *Cambourne to Cambridge statement to inform Habitats Regulations Assessment* section 6) with potential functional links to the Eversden and Wimpole Woods SAC. It is therefore imperative that habitat and connectivity is maintained and enhanced for the resilience of the SAC population and its future generations.

f. We recommend the focus should be on creating orchards that are managed beneficially in appropriate locations, rather than needing to demonstrate the ecological value of orchards.

Climate change

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

  Suggested edit to CC/IW part **6**:

  To protect and enhance water quality, all development proposals must demonstrate that:

  a. There is guaranteed sufficient hydraulic and environmental capacity for wastewater flows and treatment, and adequate wastewater conveyancing infrastructure to serve the whole development, or an agreement is in place with the relevant service provider to ensure the provision of the necessary infrastructure, to the required standard, prior to the occupation of the development (where development is being phased, this must be demonstrated for each phase before first occupation);

  Justification:

  It should be recognised that capacity of wastewater treatment infrastructure is different to the environmental capacity of water courses receiving additional flows and nutrients. Upgrades to wastewater plants which otherwise have infrastructural capacity may be required in order to avoid environmental deterioration. This is particularly important where there is hydrological connectivity with designated sites. Habitats Sites also often have more stringent water quality targets than the Water Framework Directive targets – these are provided within the Conservation Advice documents for relevant sites and should be considered within Habitats Regulations Assessments.

  Remove part **6d**. in the pdf version as this seems to be a formatting error, with no text provided.

Biodiversity and green spaces

- Policy BG/BG: Biodiversity and geodiversity

  Paragraph **5.24** – we request that the reference to 'DEFRA' is changed to 'Natural England' regarding the (currently still draft) Eversden and Wimpole Woods SAC Barbastelle Bat Protocol.

  Paragraph **5.25** – we advise making amendments to the following bullet points:

  - Ouse Washes SAC, ~~and~~ SPA and Ramsar site (and associated functionally linked land)
  - Fenland SAC and corresponding Ramsar sites (Woodwalton Fen, Chippenham Fen, Wicken Fen)
  - Breckland SAC and SPA (and associated functionally linked land).

- Policy BG/GI: Green infrastructure

  BG/GI part **6** - Replace: 'GI Operation and Maintenance Plan' with: 'GI Operation, Maintenance and Monitoring Plan'

  Insert wording in the middle of BG/GI part **6**:

  "The Plan shall establish monitoring indicators, periodic review mechanisms and adaptive management measures to secure the long-term functionality, biodiversity value, accessibility and climate resilience of green infrastructure."

Justification:

Monitoring and evaluation plans are currently weak. We suggest this could be strengthened considerably by incorporation of monitoring and evaluation measures identifying;

- indicators;
- targets;
- reporting frequency;
- lead organisations;
- success measures.

Paragraph **5.38** refers to the 2026 Green Infrastructure Strategy, but the link currently goes to the webpage for the 2011 Green Infrastructure Strategy – we advise updating this link to avoid confusion.

Great places

- Policy GP/PP: People and place responsive design

Suggested edits to GP/PP part **1a**:

i. Identifying and responding positively to their context, including existing physical features and characteristics of natural, historic, social or local importance, using relevant environmental, landscape, biodiversity, health, heritage and green infrastructure evidence to shape plans.

iv. Empowering people and communities through community engagement, co-design and participation in early stages of the planning process such as through masterplanning exercises to inform and shape design decisions and participation in delivering public art; and

Suggested new clause under GP/PP part **1a**:

vi. Working collaboratively with local communities, public bodies, environmental organisations, landowners and other stakeholders to identify opportunities to improve environmental quality, green infrastructure, health and wellbeing outcomes

Justification:

Ensures place responsive design responds to both relevant evidence bases and community needs. Aligns this policy better to Nature Towns and Cities (NTC) accreditation criterion (which Cambridge are working towards) and Green Infrastructure framework principles, which emphasise co-design and participation where plans are genuinely shaped by local people.

Proposed Submission Policies Map

Wind Turbine Zone – We understand the Wind Turbine Zone map layers do not form part of the Policies Map, however, as they are shown on the interactive map portal we wish to comment as they may be used by applicants to inform the suitability of areas before putting forward proposals. The 'Wimpole Chalk Hills' area surrounding Eversden and Wimpole Woods SAC (area 7E in Figure 1.1 of the *Greater Cambridge Landscape Sensitivity Assessment Part 2 – Renewable Energy Development*) has been given a Medium sensitivity rating, and adjacent 'Bourn Tributaries Lowland Farmlands' area to the east of the SAC (area 3B) given a Medium to Low rating on the map for Small Scale

Wind Farms and Large Single Wind Turbines. We understand that the map's ratings are based on visual Landscape considerations, however, as these areas are within the Landscape Connectivity Zone (LCZ), and some areas within the Core Sustenance Zone (CSZ) for Eversden and Wimpole Woods SAC barbastelle bats, which rely on functionally linked land outside of the SAC and may be impacted by wind turbines, we advise that these ratings should be reviewed to avoid encouraging wind turbine applications in these areas.

Sustainability Appraisal

Some of the comments below regarding the Habitats Regulations Assessment (HRA) are also relevant to the Sustainability Appraisal. We will not repeat these here, but advise that the Sustainability Appraisal should be updated as new evidence becomes available.

Habitats Regulations Assessment

We do not consider the points raised below to be soundness issues on the basis that HRA is an iterative process. Addressing these matters will however ensure the plan is more robustly compliant with the Habitats Regulations.

Air Quality
Paragraph **6.8** – Natural England welcomes that an air quality assessment will be carried out and presented in an addendum to the HRA.

Eversden and Wimpole Woods SAC
Paragraphs **4.16**, **F.13** and **F.14** - We advise that further written explanation and more detailed consideration and assessment of residual in-combination effects following mitigation measures proposed in the Local Plan, particularly regarding East West Rail (EWR), should be added to the HRA. The HRA should specify the need to ensure there is coordination with EWR (and other transport schemes) so that mitigation measures align across projects, and that proposed habitats, such as the Bourn Airfield and Cambourne North dark corridors, Strategic Enhancement Areas and 'Cambourne Forest', all guide bats to safer crossing points of the rail line rather than towards potential danger zones.

Paragraph **5.22** – We have recommended wording additions to some of the policies listed here (see above) to help resolve these HRA points.

Paragraphs **5.23** and **6.3** – 5.23 needs to make clear whether it is referring to both alone and in-combination impacts. Currently Natural England cannot agree with the conclusion ruling out Adverse Effects on Integrity (AEOI) in relation to Eversden and Wimpole Woods SAC without evidence of a clear and robust in-combination assessment which considers the potential for residual effects. As above, this should have a particular focus on areas where the EWR route interacts with allocations and their associated Strategic Enhancement Areas. We understand that full details of EWR's potential impacts are not yet available, but urge the need to specify collaboration and joined up design between schemes and allocations within the HRA and policy. This is to ensure mitigation is appropriately designed and coherent to maintain Barbastelle commuting flightlines, and to identify priority areas for the creation of additional foraging habitat where bats may be

delayed in commuting (for instance due to construction impacts and residual operational impacts such as lighting and disturbance).

Water quantity – onsite
The Supplementary Advice on Conservation Objectives for the Ouse Washes SPA and Portholme SAC provide information about the negative effects of high water levels and prolonged flood events on the designated features. This does not appear to have been considered in the HRA, despite developments having the potential to exacerbate flooding and the rate of runoff if urbanisation effects are not mitigated. Paragraphs **4.142** and **4.146** should therefore also mention the issues of excessive and prolonged floodwater on the Ouse Washes and Portholme. This should then be covered in the Appropriate Assessment, specifying the need for the water management, sustainable drainage and flood risk policies (CC/IW and CC/FM) to be adhered to.

Water quality – wastewater treatment
Paragraphs **4.153** and **5.100** state '*Portholme SAC: downstream of WwTWs in the Great Ouse catchment (south of Huntington). The SAC habitats could be affected directly.*' However, **Table 4.8** (page 79) states there is 'no impact pathway' from wastewater treatment for Portholme SAC. As Portholme is considered at Appropriate Assessment stage, we assume **Table 4.8** contains a typing error. If not, clarification should be provided to explain the discrepancies within the HRA regarding Portholme.

We find paragraphs **5.100** to **5.109** to be too generalised, without quantifying impacts or taking into account the current site condition when assessing the adequacy of mitigation. We understand, however, that further work on a supplementary report to the Water Cycle Study will be carried out in response to the Environment Agency's recommendation of a more detailed assessment of environmental risk (as stated in the *Proposed Submission Plan Draft Statement of Common Ground* Appendix 1 *Sup SoCG (v): Delivery of growth – wastewater treatment*). We agree with this and advise that the site specific water quality targets for each relevant Habitats Site, provided in their Conservation Advice documents, should be used. These are often more stringent than Water Framework Directive (WFD) targets, and achieving WFD targets is not always sufficient to achieve favourable status of designated sites' features. This should be considered in the HRA.

We also expect any actions resulting from the Environment Agency's comments (in Appendix 1 of the *Greater Cambridge Integrated Water Management Study - Detailed Water Cycle Study Wastewater Addendum (2026)*) to be carried out, and would like to see confirmation from the EA that they are satisfied that these points have been addressed. To add to comments EA8 and EA9 in the above document, we recommend that, within the planned supplementary report, it should also be established whether the required permit limits are technically feasible, whether upgrades are funded and programmed, and the consequences for planned growth if a wastewater treatment works cannot achieve the assumed limit.

Once the planned supplementary report is available, the HRA (and Sustainability Appraisal) should be updated accordingly.

HRA correction suggestions
Paragraphs **3.5**, **4.138** and **4.153** refer to The Wash and North Norfolk Coast SAC and The Wash SPA and Ramsar site being downstream of the River Cam, however it should be noted that they are also downstream of the River Great Ouse which receives water from catchments and wastewater treatment works serving Greater Cambridge.

Paragraph **4.153** – the wording in these bullet points differs from the direct/indirect conclusions in Table 4.8 – suggested amendments to paragraph **4.153**:

Habitats sites downstream of these are:

- Ouse Washes SAC, SPA and Ramsar: downstream of WwTWs in the Great Ouse catchment. The SAC fish and SAC/Ramsar habitats and plant species could be affected ~~indirectly~~ directly, and the SPA and Ramsar bird species indirectly.
- Portholme SAC: downstream of WwTWs in the Great Ouse catchment (south of Huntington). The SAC habitats could be affected directly.
- The Wash and North Norfolk Coast SAC and The Wash SPA and Ramsar site: downstream of WwTWs in the River Cam catchment. The SAC and Ramsar habitats and plant species could be affected ~~indirectly~~ directly, and the SAC mammals and SPA and Ramsar bird species indirectly.

Paragraphs **4.153** and **5.100** make reference to 'Huntington' – this should be corrected to Huntingdon.

Within HRA **Appendix D**, Site Allocations (both in 'Physical damage and loss of habitat' p.203 and 'Non-physical disturbance' p.204, under 'Site allocations meeting these criteria') there appears to be an error relating to the Bird FLL bullet points – the 'within 2km' and 'within 10km' labels should be the other way around, as there are no allocations within 2km of the Ouse Washes SPA/Ramsar, and those sites listed are actually within 10km.

Please provide a 100 word summary of your representation.

Natural England welcomes the Greater Cambridge Local Plan. We provide minor recommendations on several policies, but are pleased that the natural environment and green infrastructure have been well considered and integrated across the Plan.

Regarding the Habitats Regulations Assessment, wording about residual in-combination effects and mitigation for these should be included before we can agree with the conclusion of no adverse effect on integrity on Eversden and Wimpole Woods SAC. Additional consideration of water issues is also needed. We anticipate these HRA matters will be able to be resolved however and believe the Plan itself to be sound.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	No

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes