

Date: 05 October 2020
Our ref: 322793
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BY EMAIL ONLY

Dear Mr Macrdechian

North East Cambridge Draft Area Action Plan

Thank you for seeking Natural England's views on the above in your email of 20 July 2020.

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.

You will be aware that Natural England provided detailed comments in response to consultations on the Issues and Options consultation, in our letter dated 25 March 2019 (ref. 273507), and the draft Habitats Regulations Assessment (HRA), in our letter dated 7 May 2020 (ref. 315290).

Natural England Summary Advice

Based on the information provided in the AAP, and the findings of the Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA), Natural England's overarching advice is that further evidence is required to demonstrate that there is sufficient greenspace provision and water supply / waste water treatment capacity to meet the demands of this scale of development without adverse impact to the natural environment. Our advice is made in the context of the adverse environmental impacts already occurring to meet the recreational and water / waste water needs of the existing population.

As indicated previously Natural England has no objection to the proposed regeneration of the North East Cambridge (NEC) Area, the principle of which is established in the recently adopted Local Plans. We support the aim of the AAP to create an inclusive, walkable, integrated, low-carbon new city district within this 182 ha brownfield site located within 15 minutes cycling distance of Cambridge. However, as indicated through the HRA and SA, significant uncertainties remain regarding the potential for NEC development to adversely affect the natural environment, including a number of European and nationally designated sites, through changes in air quality, recreational pressure and water-related impacts. In light of existing environmental pressures the proposed scale of development, in combination with wider growth including Ox Cam Arc and Waterbeach New Town, is likely to require implementation of significant measures to address these issues.

Further assessment is required, for example through the Local Plan Water Cycle Study and through traffic modelling and Air Quality Assessment, to inform the recommendations of the HRA and SA and further development of the AAP. Mitigation measures identified as being necessary to avoid adverse harm to the natural environment should not be deferred to developers through high level policy requirements. To avoid any uncertainty regarding the delivery of essential mitigation measures the AAP will need to specify how and where these measures will be delivered. Robust

requirements for development to be delivered in accordance with these plans should be set in AAP policy.

With regard to accessible natural greenspace the AAP, with reference to the findings of the HRA/SA and the Greater Cambridge Local Plan Green Infrastructure and Biodiversity Opportunity Mapping project, should identify the quantum and quality of required provision for development, in combination with wider growth, to avoid adverse impact on the natural environment. Viable opportunity areas for delivering the required level of greenspace, through expansion and enhancement of the existing GI network, should be identified and mapped, as a Green Infrastructure Framework, or similar, within the AAP. Robust policy requirements should ensure delivery of the framework through each phase of development. Ideally this should be combined into GI and Biodiversity Framework, identifying similar viable opportunity areas for delivery of biodiversity mitigation and AAP enhancement targets.

Question 1 What do you think about our vision for North East Cambridge?

Natural England welcomes the plan Vision and objectives to ensure everyone has access to good quality public open spaces, to enhance health and wellbeing, and for improvements to access to existing green spaces such as Milton Country Park and Chesterton Fen. Requirements for development to contribute towards climate change targets and deliver 10% biodiversity net gain are welcomed in view of Natural Cambridgeshire's 'Doubling Nature' targets and the biodiversity net gain and nature recovery ambitions of the Defra 25 Year Environment Plan.

Natural England fully supports the inclusion of climate, water and biodiversity objectives in light of national and local climate and biodiversity emergencies and targets to address these. We welcome recognition that North East Cambridge is located in an area of severe water stress and that groundwater abstraction to meet current demand is already having an adverse effect on several water-dependent nationally designated nature conservation sites and priority habitats such as chalk streams. We fully support the inclusion of open space objectives to address green infrastructure requirements and access to the natural environment.

Whilst we generally support NECAAP environmental objectives there is currently no spatial framework for implementing these through the identification of viable opportunity areas. This needs to be addressed with reference to the findings and recommendations of the HRA/SA and the Greater Cambridge Local Plan Green Infrastructure and Biodiversity Opportunity Mapping project.

Question 2 Are we creating the right walking and cycling connections to the surrounding areas?

We welcome proposed new links, bridges and underpasses, presented in Figure 1.2, to improve access to existing green spaces (Nun's Way Recreation Ground, Milton CP, Chesterton Fen, Bramblefields LNR) subject to enhancements being made to those sites to increase their recreational carrying capacity to ensure no adverse impact to biodiversity or people's enjoyment of those spaces. This needs to be addressed through a delivery plan.

Question 3 Are the new 'centres' in the right place and do they include the right mix of activity?

Natural England has no specific comments to make in response to this question.

Question 4 Do we have the right balance between new jobs and new homes?

Natural England believes the proposal for 8000 new homes and 20,000 additional jobs is a highly ambitious for such a small site already grid-locked by traffic and lacking significant areas of accessible natural greenspace. Please see our further comments below.

Question 5 Are we planning for the right community facilities?

Please see our comments in relation to green infrastructure provision below.

Question 6 Do you think that our approach to distributing building heights and densities is appropriate for the location?

Please see our comments in relation to green infrastructure provision below. Natural England's only other comment is that this should accord with local policy requirements such as Local Plan *Policy 60 Tall buildings and the skyline in Cambridge* to protect the local landscape and visual amenity.

Question 7 Are we planning for the right mix of public open spaces?

We support proposals for new and enhanced on-site green infrastructure through the creation of a linear park and Cowley Triangle, alongside a green High Street and neighbourhood greens. However, Natural England's view is that the AAP needs to present a green infrastructure framework, or similar, to identify viable opportunity areas for expansion and enhancement of the existing network, sufficient to meet people's recreational and accessible greenspace needs and mitigate adverse impacts to existing open spaces, including designated sites and priority habitats.

Whilst the AAP commits to improving access to nearby green spaces such as Milton Country Park and Chesterton Fen, Natural England believes that provision of 10ha of public parks and squares is wholly inadequate for a development this scale and density. This magnitude of development requires strategic expansion and enhancement of the existing green infrastructure network. The AAP should identify how this will be delivered through a GI framework and delivery plan.

Question 8 Are we doing enough to improve biodiversity in and around North East Cambridge?

Natural England supports the NECAAP commitment to deliver 10% measurable biodiversity net gain through improvements to the First Public Drain and linear park and Chesterton Fen along with green linkages to other biodiversity sites. We note that developers will be asked to contribute to improvements at key sites for nature including Milton Country Park and Chesterton Fen. As per our advice on green infrastructure above, we believe these offsite environmental opportunity enhancement areas should be secured and identified within a GI and biodiversity framework plan within the AAP. The AAP should set out how the project/s will be delivered and managed in the long-term. Robust policy requirements should secure delivery / developer contributions towards their delivery.

Question 9 Are we doing enough to discourage car travel into this area?

We support the proposed measures and objectives including no additional vehicle movements on Milton Road and Kings Hedges Road, priority for cyclists and pedestrians, no through routes, 20mph speed limit and limited car parking.

We note that the SA alludes to the potential for the AAP vehicle targets to be exceeded in practice, with risk of significant negative effects on air quality particularly along the A14 Corridor, in combination with other developments to the north and east of Cambridge.

It should also be noted that in adjacent neighbourhoods with limited car parking the usual solution is for some residents to use green spaces for parking vehicles. In addition to damaging grassland habitat this also spoils the use of these areas for recreation and has a significant impact on visual amenity of the area leading to urban degradation.

Question 10 Are we maximising the role that development at North East Cambridge has to play in responding to the climate crisis?

We support the proposed commitment to zero net carbon target, water efficiency including 110lpppd, BREEAM excellent standard and 10% measurable biodiversity net gain. However, please see our comments on green infrastructure and biodiversity above and elsewhere. Delivery of the appropriate level of strategic green infrastructure will provide significant multi-functional benefits for people and wildlife including air quality and climate change.

Policy 2 Designing for the climate emergency

Natural England is fully supportive of policy requirements to mitigate and adapt to climate change. Please note our comments above.

Policies 4a – 4c

The Cambridge water environment is under significant pressure from the demands of the existing population. Groundwater abstraction to supply drinking water combined with surface and wastewater discharges are impacting on groundwater levels, river flows and water quality; this is already having an adverse effect on the natural environment, including several statutorily designated nature conservation sites. Given the severity of the existing situation any new development, including through NECAAP, will need to demonstrate, as a minimum, that water supply and surface and waste water disposal demands can be met without further detriment to groundwater levels, river flows and water quality. As a minimum development should seek to achieve no further deterioration, however, the aim of any further development should be to reduce these impacts and, as far as possible, deliver improvements in groundwater levels, river flows and water quality. Proposed development will also need to ensure and demonstrate sustainable drainage and flood risk management. These complex issues and deliverable solutions will need to be addressed through the Integrated Water Management Study / Water Cycle Study (IWMS / WCS) being undertaken to inform the Greater Cambridge Local Plan.

Whilst targets and requirements outlined in policies 4a -c are welcomed these policies should be informed by the findings and recommendations of the IWMS/WCS. Any measures to mitigate adverse environmental impact will need to be detailed and their viability assured, through the AAP. Their delivery will need to be secured through robust policy requirements.

Policy 5 Biodiversity and Net Gain

Natural England fully supports policy requirements for development to apply the ecological mitigation hierarchy and for delivery of a minimum 10% measurable biodiversity net gain.

We welcome the proposal to deliver a coherent and high-quality ecological network as part of the wider green infrastructure network including habitat and water quality improvements to The First Public Drain, Chesterton Fen and Milton Country Park. Our advice is that the AAP requires a more ambitious and strategic approach to biodiversity; the AAP should identify and map the existing GI / ecological network along with viable opportunity areas to create a GI / Biodiversity Expansion and Enhancement Framework Plan. Whilst this could include areas such as Chesterton Fen and Milton CP it should draw on the GI and Biodiversity Opportunity Mapping Project being undertaken for the Greater Cambridge Local Plan and the recommendations / opportunity areas identified in the Biodiversity Assessment (MKA Ecology, June 2020). This will need to be sufficiently ambitious to deliver mitigation measures identified through the revised HRA/SA. Policy requirements should be set to secure delivery of the Framework through each phase of development.

The requirement for ecological assessment should address the HRA recommendation for this to demonstrate no adverse impact to Eversden and Wimpole Woods SAC functional habitat for barbastelle bats.

Policy 7 Legible Streets and Spaces

We support requirements to integrate Sustainable Drainage System (SUDS) as part of a comprehensive site-wide approach and for the design to provide sufficient space for trees and planting to support biodiversity, using native species where possible. These should be 'multi-functional' to deliver benefits for people and wildlife.

Policy 8 Open spaces for recreation and sport

Whilst we support the intention of this policy to protect exiting open space and provide new and enhanced high quality, multi-functional open space, the delivery of 10ha of open space, the equivalent size of Parker's Piece or twice the area of Nun's Way Recreational Ground, is unlikely to meet the recreational demands of this sale of development and mitigate the impacts of recreational pressure offsite. This level of provision falls significantly short of Local Plan open

space requirements and is substantially less than the 8ha /1000 population standard advocated through Natural England's Suitable Alternative Natural Green Space (SANGS) [guidance](#) to meet people's needs and protect more sensitive designated sites such as Stow-cum-Quy Fen Site of Special Scientific Interest (SSSI) and Wicken Fen SSSI, Ramsar site.

We are aware that the HRA / SA are in the process of assessing the recreational pressure impacts of NECAAP development on designated sites and that these will identify specific mitigation requirements to address adverse impacts. The HRA recommends discussion with the National Trust to determine how increased impacts to Wicken Fen will be mitigated. A further recommendation is for this policy to include a commitment to the provision of alternative natural greenspace that is specifically designed and managed to alleviate visitor pressure on Wicken Fen Ramsar and Fenland SAC.

Natural England agrees that further consideration of recreational pressure through the AAP/HRA should include detailed discussion with the National Trust regarding impacts to Wicken Fen and the Vision Area. We will be pleased to engage in any discussion. To address this and the wider GI needs of the development we advise that the AAP should develop a strategic approach to GI and biodiversity by identifying and mapping the existing network and viable opportunity areas i.e. a GI / Biodiversity Expansion and Enhancement Framework Plan for expanding and enhancing the green infrastructure network, including Bramblefields, Chesterton Fen, Milton CP and elsewhere. This should draw on the GI and Biodiversity Opportunity Mapping Project being undertaken for the Greater Cambridge Local Plan and the recommendations / opportunity areas identified in the Biodiversity Assessment (MKA Ecology, June 2020). In particular this should identify viable opportunity areas for the delivery of GI/biodiversity mitigation measures identified through the revised HRA/SA, informed through discussion with the National Trust. Policy requirements should be set to ensure delivery of the Framework through each phase of development.

The scale of development and the level of greenspace currently proposed is likely to result in local sites such as Bramblefields and Milton CP being overwhelmed by additional visitor pressure. This is likely to have an adverse impact on biodiversity and people's enjoyment of these sites. Whilst we welcome further proposals to enhance linkages to existing open spaces, adverse impacts associated with the additional pressure, should be addressed through delivery of proportionate expansion and enhancement measures at these sites.

Natural England will be pleased to offer advice on a draft GI / Biodiversity Framework for the NECAAP. Our advice is that a strategic level of high-quality greenspace provision will be key to creating a healthy community and enhancing people's physical and mental wellbeing. The extent of accessible natural greenspace provision (i.e. excluding formal sports areas) should be proportionate to the scale of development, for example whilst quantity of provision should be broadly aligned with SANGS guidance, green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in [Nature Nearby](#), including the minimum standard of 2ha informal open space within 300m of everyone's home. We advise that green infrastructure provision should also seek to contribute towards the delivery of the objectives of the [Cambridgeshire Green Infrastructure Strategy](#) for habitat enhancement and improved connectivity.

Policy 23 Comprehensive and co-ordinated development

Natural England supports this policy and requirement for development to demonstrate an appropriate and proportionate contribution to site wide infrastructure including open space. However, please note our comments above regarding the need for a AAP GI / Biodiversity expansion and enhancement framework.

The requirement for a masterplan should be to demonstrate how the proposal accords with GI/Biodiversity Framework and responds to the impacts of climate change, delivers biodiversity net gain and mitigates environmental constraints.

Policy 25 Environmental Protection

We generally support this policy and its requirements to protect the natural environment.

Policy 27: Planning Contributions

We welcome the requirement for appropriate planning contributions on a scheme-by-scheme basis to finance the early delivery of major strategic infrastructure including open space.

Habitats Regulations Assessment

We welcome preparation of the updated report by LUC (July 2020) and reference to our previous advice, including acknowledgement of the potential impacts to Chippenham Fen SAC, Ramsar site through increased abstraction from the chalk aquifer and flood risk to the Ouse Washes SAC, SPA and Ramsar site. We also welcome confirmation that consideration will be given through the HRA to the implications of the Dutch Nitrogen case judgement. Our advice on the HRA conclusions and recommendations is set out below.

Eversden and Wimpole Woods SAC

The HRA concludes no adverse effect on the integrity of the SAC, through physical damage, loss or non-physical disturbance, subject to NECAAP making provision for the requirement for development to confirm no adverse effect on functional habitat used by SAC barbastelles.

Devil's Dyke SAC

At this stage the HRA has been unable to conclude that the NECAPP will not have an adverse effect on the integrity of this site alone, and in-combination, through changes in air quality. The HRA identifies that road traffic AADT calculations are required along the A14 and A1304, which lie adjacent to the SAC, to determine whether NECAAP will result in exceedance of thresholds in-combination with other plans and projects as a result of the NECAAP, noting that exceedances will require air quality modelling to assess impacts and any avoidance and mitigation measures required to enable a conclusion of no adverse effect on integrity.

Natural England's advice is that this additional modelling and assessment be carried out to inform the HRA conclusions and recommendations. The relevant NECAAP policies will need to be revised to secure delivery of mitigation recommendations.

Ouse Washes SAC, SPA and Ramsar

At this stage the HRA is unable to conclude that the NECAPP will not have an adverse effect on the integrity of this site alone, and in-combination, through changes in air quality and water resources/quantity.

The HRA recommends a commitment through NECAAP to the provision of a new WRC, upgrades and improvements to waste water infrastructure and capacity and higher standards of treatment, to meet the additional demands of new development and ensure improved water quality within the River Cam. A further recommendation is made to provide a commitment within Policy 21 (now policies 4a – 4c) to protect and enhance, through improved water quality, those European sites hydrologically connected to the AAP.

Our advice is that additional traffic and air quality modelling and assessment should be carried out to inform the HRA conclusions and recommendations with regard to air quality impacts on the Ouse Washes.

With regard to water quantity and quality the HRA will need to await the findings of the WCS to fully understand and determine the impacts of increased demand for abstraction and wastewater treatment through NECAAP alone, and in-combination with other plans and policies.

The relevant NECAAP policies will need to be revised to secure delivery of mitigation recommendations identified in the revised HRA.

Wicken Fen Ramsar / Fenland SAC

With regard to recreational pressure the HRA concludes that discussions are required with the National Trust to determine how increased impacts to the site will be mitigated, noting the findings of the Footprint Ecology Wicken Fen Visitor Survey¹ commissioned by the Trust. The HRA recommends strengthening the wording of Policy 23 (now Policy 8 Open Space), to ensure no adverse impact. The HRA recommends that this policy should include a commitment for the development of 8,500 houses in North East Cambridge, to provide alternative natural greenspace that is specifically designed and managed to alleviate visitor pressure on Wicken Fen Ramsar and Fenland SAC. A further recommendation is for discussion with the National Trust to determine exact measures that will be required to mitigate for impacts from increased recreation.

We welcome acknowledgement of Natural England's advice with regard to the provision of sufficient quantum and quality of accessible natural greenspace provision, noting Natural England's Suitable Alternative Green Space (SANGS) Guidance and Accessible Natural Greenspace Standards (ANGSt) and opportunities for new and enhance GI through the Cambridgeshire Green Infrastructure Strategy to ensure NECAAP does not rely on existing green spaces, such as Milton Country Park and Bramblefields LNR which would be overwhelmed by the proposed development.

In order to conclude no adverse effect on the integrity of Wicken Fen through water quantity and quality the HRA recommends awaiting the findings of the Greater Cambridge Local Plan Water Cycle Study. The recommendation is for policy wording, including specific detail on mitigation measures, mechanisms and timescales for delivery, to be guided by the findings of the Study, as advocated by Natural England. We welcome that the HRA acknowledges the requirement to await the findings of the WCS to fully understand and determine the impacts of increased demand for abstraction and wastewater treatment through NECAAP alone, and in-combination with other plans and policies, to identify how growth requirements can be met and consideration of alternative options to limit and if possible, reduce levels of abstraction, to ensure no further impact to the natural environment and deterioration in condition of European sites.

The HRA recommends a commitment through NECAAP to the provision of a new WRC, upgrades and improvements to wastewater infrastructure and capacity and higher standards of treatment, to meet the additional demands of new development and ensure improved water quality within the River Cam. A further recommendation is made to provide a commitment within Policy 21 to protect and enhance, through improved water quality, those European sites hydrologically connected to the AAP.

Natural England's advice is that the additional work described above should be carried out to inform the revised HRA. Mitigation measures identified as being necessary to ensure no adverse effect on the integrity of Wicken Fen will need to be detailed in the AAP and their delivery secured through robust policies.

Chippenham Fen Ramsar / Fenland SAC

We note that Chapter 6 Conclusions and Next Steps excludes Chippenham Fen Ramsar site / Fenland SAC, despite the findings and recommendations in sections 5.58 -5.63. We assume this has simply been overlooked and that this Chapter will be amended accordingly. Consideration of Chippenham Fen also appears to have been omitted from the Sustainability Appraisal.

In order to conclude no adverse effect on the integrity of Chippenham Fen Ramsar / Fenland SAC. through water quantity and quality, Chapter 5 of the HRA recommends awaiting the findings of the Greater Cambridge Local Plan Water Cycle Study. This is required to fully understand and determine the impacts of increased demand for abstraction and wastewater treatment through

¹ Saunders P., Lake S., Lily D., Panter C., (2019) Visitor Survey of the National Trust's Wicken Fen 100 Year Vision Area. Unpublished Report by Footprint Ecology.

NECAAP alone, and in-combination with other plans and policies, to identify how growth requirements can be met and consideration of alternative options to limit and if possible, reduce levels of abstraction, to ensure no further impact to the natural environment and deterioration in condition of European sites.

The HRA will need to be updated once the WCS work has concluded; any recommendations for mitigation to address adverse effects will need to be detailed in the AAP and their delivery secured through robust policies.

We welcome that the HRA will be updated in light of newly available evidence and comments from key consultees.

Interim Sustainability Appraisal

Natural England welcomes the Sustainability Appraisal Final Report (July 2020) prepared by LUC. This appears to generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment (SEA) Regulations. The SA seeks to address the effects of the AAP on key aspects of the natural environment including designated sites, biodiversity, landscape, green infrastructure, water and air quality and climate change. The assessment and recommendations / mitigation will need to be updated as the AAP policies evolve and to take into account the findings and mitigation recommendations of the outstanding environmental assessments and further revised HRA.

We agree that the NECAAP is likely to make substantial contribution to meeting the considerable local housing and employment needs and the Plan has a strong focus on moving towards net zero carbon emissions. Whilst the AAP is expected to result in overall significant positive effects against the majority of SA objectives, negative effects are identified for air quality, pollution greenhouse gas emissions due to increased energy and vehicle use to some extent, even if this is substantially lower per person than the surrounding area. The SA highlights the risk of significant negative effects on air quality particularly along the A14 Corridor, in combination with other developments to the north and east of Cambridge, if the trip budgets which the AAP seeks to achieve are exceeded in practice.

Natural England notes the potential for significant cumulative negative effects on protected habitats and species based on the findings of the HRA, noting that these are uncertain pending the requirement for further work to assess potential recreational pressure, air quality and water-related impacts. The SA will need to be updated with the findings and recommendations of these further assessments in due course. Mitigation measures will need to be detailed in the AAP and their delivery secured through robust policies.

Whilst we generally support the findings of the SA our advice is that negative / uncertain effects on protected habitats and species, including Milton Road Hedgerows City Wildlife Site and Bramblefields LNR should not be deferred to the 'detailed proposals' stage. Any potential risks to these sites, including indirect effects to any statutorily designated sites, should be assessed through the SA and any adverse impacts appropriately mitigated, through Plan policies.

We note that the SA has omitted consideration of impacts to Chippenham Fen Ramsar site and to the National Trust's Wicken Fen Vision Area.

I hope the above comments are helpful. If you have any queries relating to the advice in this letter please contact me on [REDACTED].

Yours sincerely

Janet Nuttall
Sustainable Land Use Adviser